



Grenfell Tower Inquiry

Day 124

May 4, 2021

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Tuesday, 4 May 2021

1
2 (10.00 am)
3 SIR MARTIN MOORE—BICK: Good morning, everyone. Welcome to
4 today's hearing. Today we're going to continue hearing
5 evidence from Mr Maddison of the TMO.
6 So would you ask Mr Maddison to come back in,
7 please. Thank you.
8 MR PETER MADDISON (continued)
9 SIR MARTIN MOORE—BICK: Good morning, Mr Maddison.
10 THE WITNESS: Morning.
11 SIR MARTIN MOORE—BICK: That's it, get organised, and
12 then ...
13 THE WITNESS: Thank you.
14 SIR MARTIN MOORE—BICK: All right? Good.
15 Yes, when you're ready, Mr Millett.
16 Questions from COUNSEL TO THE INQUIRY (continued)
17 MR MILLETT: Mr Chairman, good morning. Good morning,
18 members of the panel.
19 Good morning, Mr Maddison.
20 A. Good morning.
21 Q. I'm going to ask you some questions now about the topic
22 of consultation.
23 Can I please take you to your statement,
24 {TMO00000892/22}. Look at paragraph 115. You said
25 this:

1

1 "In terms of general interaction and concerns there
2 is a recognised local authority process whereby
3 representative groups may voice opinions. Here the
4 recognised residents associations had been the
5 Lancaster West Residents Association and Lancaster West
6 Management Board but these were in existence before
7 I joined TMO and I had no interaction with them. My
8 perception is that historically there had been issues
9 with both organisations."
10 Now, Lancaster West Estate Management Board had
11 ceased to exist by the time you joined the TMO; is that
12 right?
13 A. I think so.
14 Q. Yes. What historical — you used the word
15 "historical" — issues or problems had there been with
16 the Lancaster West Residents' Association?
17 A. I don't know the detail because I wasn't really involved
18 with either organisation, but I think it was about
19 having meetings that were quorate and holding AGMs so
20 there was a clear agenda, really.
21 Q. Does that mean that when you joined the TMO in
22 January 2013 there was no representative
23 residents' association for Grenfell Tower?
24 A. Not for Grenfell Tower on its own, no.
25 Q. What about the Lancaster West Estate more generally?

2

1 A. I don't know. I mean, there was
2 a residents' association but I don't know the status of
3 that residents' association at that time. It did
4 become — it did refocus itself later on, but — and
5 I did attend at least one meeting of those, but I think
6 that was the only one, in about 2017.
7 Q. Were you aware of an organisation called the
8 Grenfell Tower Leaseholders' Association or GTLA?
9 A. I would get emails from members of that. I didn't know
10 that it was a constituted organisation in itself, but
11 I did receive correspondence from that group.
12 Q. Right. Did you consult with GTLA about the
13 refurbishment or any other management problems or issues
14 at Grenfell Tower?
15 A. Not specifically with them, but the residents or the
16 leaseholders of — in that group would be involved in
17 any block-wide consultation.
18 Q. Did you ever check whether GTLA was a registered
19 association, registered —
20 A. I had conversations with the head of the home ownership
21 team who was responsible for the leaseholders and also
22 the head of resident engagement. So I had briefings
23 from people who knew those organisations.
24 Q. Can we go, please, to {RBK00000860}.
25 This is the Grenfell Tower regeneration

3

1 communication plan draft version 1, and you can see that
2 it's created in August 2013 by Thea McNaught—Reynolds as
3 the author and shows the project manager as
4 Claire Williams.
5 Are you familiar with this document?
6 A. I haven't seen it probably since that date.
7 Q. Right. Did you see it back then?
8 A. I don't recall. It will be —
9 Q. Right. Do you know who asked for it to be produced?
10 A. Erm ... I don't.
11 Q. Can you go to page 3 {RBK00000860/3}, please. We can
12 see in the left-hand column there under 1.5
13 "Communications Objectives", a number of objectives in
14 the column, and objective 1 is:
15 "Residents of Grenfell Tower understand goals of the
16 project and projected timelines."
17 The plan would be a responsive two-way communication
18 with residents, responding to their concerns and
19 questions in a timely manner.
20 "Level of engagement — consult."
21 Objective 2:
22 "Residents of Grenfell Tower have confidence in the
23 project and TMO's ability to deliver."
24 Plan:
25 "Responsive two way communication with residents

4

1 facilitates a positive ongoing relationship.
 2 "Level of engagement — consult."
 3 It continues down the series of objectives, turning
 4 from "consult" to "inform" in places.
 5 The plan clearly sets out that communication with
 6 residents should be two—way, as I've shown you. Did you
 7 agree with this idea at the time, do you think?
 8 A. Yes, I think this is a — this document is trying to lay
 9 out the ways in which we would communicate, engage,
 10 consult or involve residents at various stages.
 11 Q. Do you remember having any input into this plan?
 12 A. I don't specifically remember it, but it's something
 13 that we would have discussed within the project team,
 14 yes.
 15 Q. Right.
 16 Who is Thea McNaught—Reynolds?
 17 A. She was in — she was a communications officer.
 18 Q. And what was her role in relation to the refurbishment
 19 in general terms?
 20 A. She would give advice on communications issues.
 21 Q. Right. She clearly produced this document; do you know
 22 who she produced it for?
 23 A. I don't remember this document being produced. It was
 24 a very long time ago now.
 25 Q. Right. Do you remember any discussion of this document?

5

1 A. Not specifically the document. There was discussion
 2 about how to consult residents and how that engagement
 3 would work in practice.
 4 Q. Right.
 5 You can see in the right—hand column that, as
 6 I said, there's a plan to consult under objectives 1
 7 and 2, and a plan under objective 3 to inform, and the
 8 same again under objectives 4 and 5 in the second bullet
 9 point. Different levels of engagement, you see.
 10 What was the difference between "consult" level of
 11 engagement and "inform" level of engagement?
 12 A. I think at different stages of the project there would
 13 be different types of engagement with residents,
 14 potentially, so — I mean, I think consultation is about
 15 a two—way communication, where we're asking for feedback
 16 on a proposal, for example. Inform is sometimes when
 17 things are more definite, informing somebody that
 18 something is going to happen on a particular day. There
 19 was also a further level of detail which was about
 20 involving residents, and so for example we would involve
 21 residents in the selection process of contractors,
 22 for example, and involve them in evaluating contractor
 23 bids. So they're the three dimensions of a consultation
 24 plan.
 25 Q. Now, the objectives, as you can see in the left—hand

6

1 column, were clearly objectives relating to the
 2 refurbishment. Do you know who perceived these
 3 objectives to be necessary objectives? Put another way,
 4 whose idea was it that these objectives were aimed at
 5 problems to be solved?
 6 A. I don't necessarily think they're problems to be solved,
 7 I think this was probably a discussion document that
 8 Thea has put together to try and provoke a conversation
 9 within the project team about how we can consult,
 10 involve, inform residents.
 11 Q. I mean, do you know the basis, for example, on which
 12 Thea McNaught—Reynolds thought it was necessary to have
 13 a specific objective whereby residents of Grenfell Tower
 14 have confidence in the project and TMO's ability to
 15 deliver?
 16 A. Sorry, could you ask that question again?
 17 Q. Yes. What was the basis of the author's decision to
 18 have a specific objective 2, as you can read it there,
 19 that residents of Grenfell Tower have confidence in the
 20 project and TMO's ability to deliver?
 21 A. I don't know.
 22 Q. Did somebody tell her that that was an objective that
 23 was necessary?
 24 A. I think she must have come to an opinion that that was
 25 a reasonable objective and put it to the team as

7

1 a proposal.
 2 Q. Yes. My question to you is: do you know why she formed
 3 that opinion?
 4 A. I can't — I don't.
 5 Q. Right.
 6 Can we turn to page 6 {RBK00000860/6}, please, where
 7 we will see a situation analysis, and on the screen
 8 about halfway down, two—thirds of the way down, it says:
 9 "In general, a lack of trust ..."
 10 Do you see that?
 11 A. No.
 12 Q. Well, it's about two—thirds of the way down the screen,
 13 where the arrow is.
 14 A. Yes.
 15 Q. "In general, a lack of trust and a perception by
 16 residents that TMO doesn't respect them are clear
 17 barriers to the project.
 18 "Inadequate and intermittent communication has also
 19 given residents cause for distrust and they have
 20 resorted to making FOI requests to obtain the
 21 information they believe has been denied them."
 22 Then there are some entries under that:
 23 "Resident consultation on certain aspects of design
 24 etc. but not overall.
 25 "Regular newsletter — light on information.

8

1 "Letters to residents — ad hoc and not providing the
2 information they wish to see.
3 "Face to face meetings have been acrimonious and
4 unproductive."
5 Now, those four matters there, do you agree that
6 each of those four statements were justified at the
7 time?
8 A. Erm ... yeah, I think that's a reasonable assessment.
9 Q. Yes.
10 Again, do you know what the source of these
11 descriptions of the relationship between the TMO and the
12 residents of the Lancaster West Estate were?
13 A. Erm ... I think at this time — so, from memory, the
14 first meeting I had with the — so the way that we
15 consulted residents up to this point, there'd been
16 a different team, so my predecessor had had a particular
17 approach to communicating with residents, and this was
18 a review, because there'd been a — the project had
19 stalled at this stage. There were some planning issues,
20 the project had stalled. A lot of the conversation from
21 residents at this stage was about a distrust about the
22 project being delivered because of delays, you know,
23 a lot of the complaints were about delays, and that came
24 across quite strongly at the first meeting that I went
25 to with residents in, I think, the June of 2013. And

9

1 I think Thea was at that meeting, and I think she's
2 taken this document to pull together her assessment of
3 some of the issues that she felt the residents were
4 saying from that meeting, and trying to pull together
5 a proposal as to how we could engage residents more
6 effectively going forwards.
7 Q. The sentence that I read to you two-thirds of the way
8 down:
9 "In general, a lack of trust and a perception by
10 residents ..."
11 It's clear from this, isn't it, that the lack of
12 trust and perception described there was not limited to
13 a number of particular individuals; certainly the author
14 of this paper regarded it as a general problem?
15 A. I don't know, I think this is probably — Thea, I assume
16 at this stage, had probably only been to one meeting, so
17 I think she was taking an assessment based on quite
18 a limited amount of evidence, but I think it was —
19 I could understand why she came to that conclusion.
20 Q. Can we go to page 10 {RBK00000860/10}, please. Here we
21 see a communications activities schedule towards the
22 foot of the page, and it says:
23 "This communications activities schedule is a live
24 document which will be regularly reviewed and updated to
25 make sure that agreed communications activities are

10

1 being carried out and communications objectives are
2 being met. Communications will be responsible for
3 updating this schedule as and when changes or new
4 opportunities occur."
5 Then you can see the columns across the bottom of
6 the page: "Date", "Activity", "Channel", and "Actioned
7 by, and involvement".
8 If you turn to the next page, please, page 11
9 {RBK00000860/11}, we've got the activities for the year
10 2013, starting in July, perhaps because this document is
11 dated August. Then you can see those in July and August
12 on that page. If one scrolls down — there is no need
13 to do this — one can scroll over the following pages,
14 it runs into September, October and November, to the end
15 of the year.
16 Particularly, look at the item at the bottom of
17 page 11, Thursday, 15 August:
18 "Propose Grenfell Tower regeneration Residents group
19 to residents."
20 Then:
21 "At the Thursday meeting."
22 You see that?
23 Was a Grenfell Tower regeneration residents group
24 actually proposed to residents at that meeting, do you
25 remember?

11

1 A. I don't remember. I went to a series of meetings
2 following the initial meeting in June that year, and the
3 meetings were very poorly attended. I think what we
4 were discussing here was how we could put together
5 a more effective way of communicating with residents.
6 So I don't remember whether there was — specifically
7 that was discussed at that meeting or not. But I do
8 know that shortly after that we did a consultation
9 process with residents to consult them on the way that
10 they wanted to be consulted, which was really the next
11 step from this.
12 Q. Yes. We do have the minutes of that meeting, and they
13 are at {TMO10049910}, but I won't take you to them.
14 Take it from me there is no reference to a group being
15 proposed.
16 My question is: why was a residents' group not
17 actually created at that time?
18 A. I don't know about at that time, that was the August.
19 I do remember we consulted residents more broadly on the
20 various ways in which they could or wanted to be
21 consulted, and that was where the focus was given from
22 this point.
23 Q. I see.
24 Can we go to your statement, page 22
25 {TMO00000892/22}, and look at paragraph 116, just below

12

where we were:

"We held public meetings and drop—in sessions for residents. We then consulted residents on their preferred method of consultation. Only one resident favoured public meetings. The majority asked for Newsletters plus informal drop—ins."

Can I show you first, please, {TMO10031174}. That is a document entitled "Grenfell Tower Review, Consultation, Section 5 — Consultation Surveys".

Are these the consultation surveys you were referring to just there in your statement?

A. I've never seen this document.

Q. I see.

A. I don't think so. No.

Q. You've never seen this document before?

A. No, this looks like it's ... this is a TMO/Rydon issue, so I assume these survey forms are about the detailed surveys of residents' homes about where central heating layouts will be and — so, no, I think that's a document that Rydons would produce with the TMO when we're consulting about the specifics of works in their homes.

The consultation document that I was talking about was — so each time we had a public meeting we would also have drop—in sessions, so you'd have a formal meeting, and you'd also have an opportunity for people

13

to come and talk to us individually, and that was a process that seemed to work, because it was easier for people to talk about their specific needs or concerns to people.

At those meetings in the December and January that year, we carried out a residents' survey asking about the way — the methods — the appropriate methods that they would prefer to be consulted, and the strong preference was for residents to be — to continue the drop—in sessions but to be informed through newsletters on progress. But very few people — I think only one person actually said that they wanted larger public meetings.

Q. Let's just stick with this document and see how far you can help us.

Can we please go to page 3 {TMO10031174/3}, where we can see a blank form.

A. Okay.

Q. "How do you want us to consult with you? Please rank options with 1 being top, and 6 being least preferred."

You can see the six options there. The option for a formal meeting you can see is item 5:

"By formal meeting, held between 6—7pm."

Was that right, that the only option for a formal meeting was that one hour in the evening?

14

A. That was being proposed as a proposal.

Q. But do you know any other proposal for any other kinds of meetings, other than the one hour in the early evening?

A. Well, drop—in sessions would always be run during the day and in the evening, so there would be informal opportunities for people to come and discuss with us.

Q. You can see that residents were asked to rate their preference from 1 to 6.

If we go to page 9 of this document {TMO10031174/9}, we can see the results of that survey. There you can see:

"65 households attended this session — ie over 50% of block.

"55 forms were returned."

And the top preference, as you can see there, was for individual letters posted or put through the door; that's right, is it, that that's what they wanted?

A. That's my understanding, yes.

Q. Right. So not newsletters; yes?

A. Well, newsletters were the second preference, so —

Q. Yes, exactly.

Was there any attempt to consult further residents after this survey or did you leave it at that?

A. So from this survey we went through a process of doing

15

all of these items, 1, 2, 3 and 4, but we didn't hold formal meetings, and we also put notices on the notice — so we actually did all of these things but didn't have formal meetings, because those meetings had been poorly attended and people didn't appear to find them a useful way of communicating. So our focus was really trying to be more bespoke to individual needs, talking to residents on a one—to—one basis or in smaller groups at a drop—in session, and so we gave a broad range of opportunities for people to engage with us.

Q. If we go back to page 1 of this document {TMO10031174/1}, we can see on the first page there in the first box it says that the consultation survey, central heating survey and information on central heating was sent by TMO and Rydon to residents attending the drop—in session on 12 December 2013. Is that right? Is that what happened as a matter of fact?

A. I don't know, I didn't attend those meetings.

Q. No, but even if you didn't attend those meetings, did you know that that's what had happened, the results of the survey?

A. I'd understood that all of the people who had attended those drop—in sessions in December and January were asked to fill in the form that you showed me before, to give us their preferences about how they wanted to be

16

1 consulted.

2 Q. Right. I mean, this suggests that the survey was taken

3 at a drop—in session on 12 December 2013; is that

4 correct?

5 A. My understanding is that it took place at the drop—in

6 session, I think there was more than one session, on —

7 in December 2013 and in January 2014, was my

8 understanding.

9 Q. Right. So you say there were two occasions, two drop—in

10 sessions, one on 12 December 2013, and another in

11 January 2014; is that your understanding?

12 A. That's my understanding.

13 Q. That's your recollection, is it? Right, I see.

14 Can we then go to the KCTMO programme board meeting

15 minutes of 21 November 2013, and we'll find those at

16 {TMO10028444/7}. We can see who is present, and we can

17 see that you attended the meeting for the first item,

18 "Assets and regeneration", together with David Burns.

19 If we look at the last line of the first paragraph,

20 it says:

21 "It had been agreed to hold no more public meetings

22 because of the stand being made by the Grenfell Tower

23 leaseholder group."

24 Now, I'm showing you that. Now let me show you your

25 first witness statement, please, at page 34

17

1 {TMO00000892/34}. Let's go on that page, please, to

2 paragraph 179. You deal with this meeting there. You

3 say:

4 "I attended the next Programme Board on

5 21 November 2013 ... reporting that formal planning

6 approval was still awaited but we were ready to go out

7 to tender and we would be on site next Spring. It is

8 inaccurately recorded that I reported 'it had been

9 agreed to hold no more public meetings because of the

10 stand being made by the Grenfell Tower Leaseholder

11 Group'. The reality was that residents' meetings were

12 poorly attended and nobody wanted them, and we moved to

13 drop—in sessions and newsletters."

14 Now, is it right that you received the minutes that

15 I've just shown you after the meeting?

16 A. I don't remember.

17 Q. Why did you not correct the minutes, if you did receive

18 them, when you did?

19 A. I don't know that I picked up that nuance.

20 Q. Right. So is this another example of minutes of

21 meetings which you disagree with?

22 A. I think it's not precisely what I was reporting.

23 Q. Right.

24 A. In reality what we did from that point, from the point

25 of that meeting, was to consult residents on how they

18

1 wanted to be consulted. That would have been a more

2 accurate way of reporting what was being agreed at this

3 time.

4 Q. Can we go to {RYD00009237}. This is a note dated

5 14 November 2013 on the Grenfell Tower regeneration

6 notepaper with some topics set out, and it's the notes

7 from the Grenfell evening meeting.

8 Under the header "Issues raised", if you look

9 three-quarters of the way down the screen, "Procedures",

10 we have (a) apologies, and then (b) notice of events.

11 It says:

12 "Comment was made that 6 days notice was not enough,

13 in future the TMO will give 7 days notice of future

14 consultation events."

15 Do you recall that there was concern among the

16 residents of Grenfell Tower that there was not enough

17 notice to them about when consultation events would take

18 place?

19 A. I don't remember that.

20 Q. Was the number of residents who participated in such

21 events affected, do you remember, by the late

22 notification of the events or meetings?

23 A. I don't think it was a significant factor, because all

24 of — none of the meetings were very well — well, there

25 was one meeting that was well attended, but that was

19

1 really because there was an appetite to talk about the

2 power surges that were relevant at that — that were

3 relevant at that time.

4 Q. That was earlier in 2013?

5 A. That was in June. But the subsequent meetings were very

6 poorly attended, there would be a handful of people, and

7 I didn't think it was late notification that was leading

8 to that.

9 Q. Right.

10 {RBK00003386}, please. This is an email exchange

11 between Councillor Blakeman and

12 Councillor Rock Feilding—Mellen, copied to

13 Laura Johnson, on 11 December 2013.

14 If we look at the last paragraph on page 1, it says:

15 "At the moment Mr Daffarn [and the next few words

16 are redacted] but he has been so disruptive during the

17 Grenfell Tower consultations that Peter Maddison has

18 suggested and I have agreed that we do not hold any more

19 open meetings."

20 I show you that.

21 Do you recall discussing the consultation meetings

22 with Councillor Blakeman?

23 A. Yes.

24 Q. Do you recall suggesting to her, as she records here,

25 that you do not hold any more open meetings?

20

1 A. I discussed the fact that the meetings that we had were
 2 poorly attended and could be disrupted, and that we
 3 should consult residents on how we should consult them
 4 going forward, so we could be more effective in our
 5 consultation, because the process we were going through
 6 with these meetings wasn't working.
 7 Q. You see, she says at the time that he, Mr Daffarn, has
 8 been "so disruptive during the Grenfell Tower
 9 consultations that Peter Maddison has suggested and
 10 I have agreed that we do not hold any more open
 11 meetings".
 12 At the time, she was attributing the cessation of
 13 open meetings to Mr Daffarn's disruptive conduct during
 14 those consultation meetings, and attributed that to you
 15 as the suggestion.
 16 A. I would put it a different way, which would be that the
 17 meetings that we were holding weren't effective, they
 18 weren't well attended, and that we should look at
 19 a better way of engaging with residents.
 20 Q. Well, she hasn't said, "Peter Maddison has suggested
 21 that we don't hold any more open meetings because
 22 they're not well attended", she is saying you suggested
 23 it because of Mr Daffarn's conduct; do you agree?
 24 A. They're Councillor Blakeman's words, not mine.
 25 Q. They are. Do you agree?

21

1 A. I don't — well, I don't disagree with the fact that the
 2 meetings were disrupted, but I felt the key issue from
 3 my personal perspective was that I felt that the
 4 consultation meetings weren't effective and that we
 5 should do something different, and that was to really
 6 focus on what residents wanted and how they wanted to be
 7 engaged with, and make sure that we were listening to
 8 their issues and responding to them on a more one-to-one
 9 basis than as a collective.
 10 Q. Do you agree that the reason or one of the reasons that
 11 you suggested that you stop holding open meetings was
 12 because of Mr Daffarn's disruptive conduct?
 13 A. One of the reasons was that some of the meetings were —
 14 there was disruptive behaviour at some of those
 15 meetings, yes.
 16 Q. Right.
 17 A. But there were other factors too.
 18 Q. I see.
 19 Were you seeking to prevent Mr Daffarn from
 20 participating fully in the consultation process?
 21 A. Not at all. There were 120 households in the block, and
 22 it was important that we listened to all of them,
 23 including Mr Daffarn.
 24 Q. Now, can we turn to the Grenfell Compact next.
 25 Now, if we look at your first statement, please, at

22

1 page 22 {TMO00000892/22}, next paragraph down,
 2 paragraph 117, you say:
 3 "A formal focus group recognised by local
 4 authorities and known as a 'Compact' was set up
 5 specifically in response to issues raised by and on
 6 behalf of residents regarding the location of the HIUs
 7 within some flats. This was set up and various
 8 individuals were involved."
 9 Now, it's right, isn't it — and correct me if I'm
 10 wrong about this — the TMO agreed to recognise the
 11 Grenfell Compact at a meeting on 17 July 2015 attended
 12 by Victoria Borwick, the MP?
 13 A. I don't know if that's correct. There had been previous
 14 contact with the Compact residents before that. The
 15 Compact residents had contacted Councillor Blakeman and
 16 Councillor Blakeman — had attended
 17 Councillor Blakeman's surgery in June, and I'd met with
 18 the group in June in the show flat, so that pre-dated
 19 the meeting with Councillor Borwick.
 20 Q. Yes, my question was about recognition rather than
 21 contact.
 22 Do you agree that the TMO agreed to recognise the
 23 Grenfell Compact on 17 July 2015, at a meeting with
 24 Victoria Borwick?
 25 A. I don't know, I don't recall exactly the details of when

23

1 it was recognised, but we had engaged with the residents
 2 in the Compact prior to that meeting.
 3 Q. Well, let me put something to you.
 4 Can we please go to {IWS00002110}, please. I'll
 5 show you the first page. This is a witness statement to
 6 the Inquiry given by Mr William, or Willie, Thompson,
 7 who was a resident of Grenfell Tower. This is the first
 8 page of his second statement to the Inquiry.
 9 Can we go to page 22 {IWS00002110/22}, please, and
 10 I want to show you paragraph 75.
 11 "Formation of the compact.
 12 "75. It was only after Victoria Borwick MP attended
 13 the 17 July residents meeting with Rydon and with
 14 Peter Maddison that the TMO allowed us to be recognised;
 15 David Collins applied for us to be recognised as a
 16 Compact and we were."
 17 Did you agree to recognise the Grenfell Compact
 18 because of Victoria Borwick MP's intervention on that
 19 date?
 20 A. No, as I explained, we'd met with the group previously
 21 with Councillor Blakeman in the show flat to discuss the
 22 issue around the HIU, so that was an ongoing discussion,
 23 and that was as a result of Councillor Blakeman talking
 24 to that group and saying to me that she felt that they
 25 had some issues that we needed to communicate with them

24

1 about.
 2 The formal recognition of the Compact would have
 3 been put in place by the community engagement team and
 4 I had no part in the detail of signing up to that
 5 agreement, from what I remember.
 6 Q. Right.
 7 Now, can we go, please, to {TMO00832280}. This is
 8 an email from Edward Daffarn to Janet Edwards at the TMO
 9 dated 24 January 2014, and if we go to page 2
 10 {TMO00832280/2}, we can see that that is at the end of
 11 an email chain which has on it, at the very top of
 12 page 2, an email of 24 January to Mr Daffarn from
 13 Janet Edwards of the TMO. She says:
 14 "I write further to Claire Williams email to you
 15 below dated 23 January.
 16 "I would like to reiterate, as we have done
 17 previously, that the TMO are unable to recognise
 18 Grenfell Tower Residents Group as there is in existence
 19 an RA covering the Lancaster West Estate area. I will
 20 again, by separate e-mail, forward the responses you
 21 received from Yvonne Birch and myself on this matter in
 22 2012/13."
 23 Do you remember that? Do you remember this
 24 exchange? You weren't copied in on it, it is fair to
 25 say, but do you remember the subject coming up?

25

1 A. I wasn't copied in to it, but I was aware from talking
 2 to Janet Edwards, who was the head of the resident
 3 engagement team, that there had been previous
 4 conversations from Mr Daffarn trying to set up
 5 a specific resident group for Grenfell. Her view was
 6 that there was already a residents' association set up
 7 for Lancaster West.
 8 Q. Right.
 9 A. So I had no part in that, but I was aware of that being
 10 the position.
 11 Q. Now, going back to the email I started this with, which
 12 was the email from Mr Daffarn to Janet Edwards in
 13 response on page 1 {TMO00832280/1}, you're not copied in
 14 on this, Claire Williams is. Do you think you saw this
 15 at the time nonetheless?
 16 A. I don't think so, no.
 17 Q. You don't think so. Do you remember, nonetheless, that
 18 Janet Edwards' refusal of Mr Daffarn's request to
 19 recognise a Grenfell Tower residents' group provoked
 20 bitter complaint from him?
 21 A. I don't recall.
 22 Q. I'm summarising.
 23 A. I don't think I was — I don't think I would have been
 24 involved in that dialogue.
 25 Q. Right, I see.

26

1 Can we then move on further into the year, 2014.
 2 {TMOH00004881}. It's a strange reference, but there
 3 it is. This is an email of 17 September 2014 from
 4 Janet Edwards to Edward Daffarn, where she says in the
 5 second paragraph:
 6 "I would confirm that the TMO has no objection to
 7 the tenants and leaseholders of Grenfell Tower forming
 8 a Grenfell Tower Improvement Works Resident Group, and
 9 I would advise that this Group will be consulted by the
 10 TMO on matters relating to the Grenfell Tower building
 11 works. Indeed, the TMO has no objection to any
 12 residents wishing to form a resident group for purposes
 13 of consultation.
 14 "I would also confirm that we are still working with
 15 the Lancaster West RA which represents all residents on
 16 the Lancaster West estate."
 17 Now, you weren't copied in on this, but it did go to
 18 the complaints team and Fola Kafidiya.
 19 Were you aware that Janet Edwards had changed her
 20 position in September 2014 from the position that had
 21 previously been taken by her in the January of that
 22 year?
 23 A. I don't know that she's changed her position, I think
 24 she's making a distinction between a residents'
 25 association and a group that's put together for the

27

1 purposes of consultation on a particular project.
 2 I suspect that's what she's highlighting here.
 3 Q. Right.
 4 Do you know why Ms Edwards didn't make this
 5 suggestion when asked originally in January 2014?
 6 A. I don't know.
 7 Q. Right.
 8 Can we please go to {TMO00846124/2}. This is
 9 an email from Claire Williams to David Collins, copied
 10 to Edward Daffarn, and in the middle of page 2, the
 11 fourth paragraph down, you can see what she says there.
 12 She says:
 13 "In your email you ask whether the TMO would
 14 acknowledge the Grenfell Community Unite group as a
 15 representative voice of leaseholders and tenants. I am
 16 advised that this group will not be recognised by the
 17 TMO, as there is a Residents Association already in
 18 existence. The TMO are currently working with the
 19 existing Lancaster West Residents Association, and are
 20 currently making arrangements with them to hold an AGM.
 21 There was communication with Mr Daffarn in early 2014
 22 relating to forming an alternative residents' group."
 23 Now, I should have told you the date of this, it's
 24 17 April 2015 now.
 25 Before I ask you about what I've just read out to

28

1 you in that email, I want you to have that in mind,
 2 I just want to look at two earlier emails.
 3 The first one is at {TMO00845965}. This is an email
 4 from you on 1 April 2015 to Fola Kafidiya, copied to
 5 a number of people at the TMO, including Janet Edwards,
 6 you will see, as well as Claire Williams and
 7 Janet Edwards again. She appears twice.
 8 You say:
 9 "Mr Daffarn is continuing to agitate in
 10 Grenfell Tower.
 11 "Attached are the latest posts on his website. He
 12 is clearly distributing misleading information (I've
 13 highlighted the most serious allegations). Fola —
 14 I wonder if you could advise on the point at which his
 15 comments becomes libellous?
 16 "Most of the comments relate to works that are not
 17 yet finished.
 18 "Furthermore, there has been no direct contact from
 19 this group to formally raise these issues.
 20 "We will continue to communicate with residents
 21 through our regular newsletters. Our continued approach
 22 is to focus on one to one consultation to agree the
 23 detail of the scope of works within residents' homes.
 24 "Mr Daffarn continues to press for a recognised
 25 resident group."

29

1 You attached, as we can see, certain blog posts to
 2 your email. Those are at {TMO00845967}, and there are
 3 a number of these in this document reference, but I'll
 4 just show you the first one. It's entitled,
 5 "A Collective Voice For Residents As 'Grenfell Community
 6 Unite' Is Formed!" Posted on 31 March 2015, so the day
 7 before your email, Mr Maddison.
 8 What did you think Mr Daffarn was doing in
 9 Grenfell Tower by way of, as you put it, agitation?
 10 A. Could we go back to that email?
 11 Q. Yes, can we go to the previous document, please,
 12 {TMO00845965}.
 13 A. So I think there were a number of issues going on here
 14 that — so one was Mr Daffarn wanted a collective group
 15 for Grenfell Tower to represent them, and there was —
 16 so there had been an ongoing dialogue between the
 17 resident engagement team and himself about that. Then
 18 there's a discussion about how to consult residents on
 19 the works, so it's a discrete issue relating to the
 20 works, and that was where we had consulted residents on
 21 how they wanted to be consulted and come to a particular
 22 view as to how we were going to take that forward, given
 23 the feedback that had been received to date.
 24 This next piece of communication seemed to be at
 25 odds with what we'd consulted with the broader community

30

1 about, and that felt like an area that needed to be
 2 resolved. Some of the issues that were being raised
 3 through Mr Daffarn's blog were being communicated
 4 inaccurately. For example he was saying that — giving
 5 photographs of work that were in progress saying, "Look
 6 at these terrible exposed pipe works", when in fact the
 7 pipework hadn't yet been enclosed. So he was passing
 8 misinformation through the blog, and that was where
 9 I felt that we needed to be very clear on how we
 10 communicated to all the residents and engaged with all
 11 the residents in the block, not just a small number.
 12 Q. What did you mean by "agitation"?
 13 A. I think that I felt he was passing misleading
 14 information through his blog and using that to cause
 15 confusion among the residents. So we were trying to
 16 consult residents and engage with residents, and the
 17 blog was giving misleading information.
 18 Q. Now, you say in the second paragraph, as I've read to
 19 you, that you have highlighted the most serious
 20 allegations.
 21 Can we go back to the document I was on, which was
 22 the blog posts, {TMO00845967}. The yellow there is your
 23 highlighting, is it?
 24 A. I don't remember.
 25 Q. Right. You don't remember. We've proceeded on the

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1 basis that they are your highlights. If they're not,
 2 then please do tell me.
 3 Can we go to page 1, please, first of all. We can
 4 see there that you're pursuing, as he sees it, a
 5 "TMO/Rydon hated policy of 'divide and rule'", and then
 6 in the last sentence that you have treated the residents
 7 with complete contempt.
 8 Turn to page 2 {TMO00845967/2}:
 9 "... the TMO/Rydon are using threatening and
 10 intimidatory tactics to scare residents into allowing
 11 them access into our homes. We despise these underhand
 12 and bullying tactics from the TMO/Rydon who have been
 13 telling residents that if they do not co-operate that
 14 they will have no heating from sometime around May 2015
 15 and that they will lose their tenancies unless access is
 16 granted so that Rydon can come in and simply butcher our
 17 homes. It is ridiculous that the TMO can even be
 18 thinking of threatening us with legal action when all
 19 that we have requested is that they don't enter our
 20 properties without first giving us a guarantee that the
 21 work will undertaken in a professional manner and to
 22 a high standard."
 23 That's another one you have highlighted.
 24 Then if we go to page 4 {TMO00845967/4}, the second
 25 paragraph:

32

1 "Mr Edward Daffarn then informed the meeting about
2 past attempts by residents to gain a united voice for
3 the Grenfell Tower community and how the RBKC Council
4 and the TMO have worked to prevent tenants and
5 leaseholders from forming any form of collective
6 resident representation."

7 I've shown you three of those you have highlighted,
8 or it appears that you have highlighted.

9 What was it about those particular passages that you
10 objected to?

11 A. Could we go to the second one?

12 Q. Yes, go to page 2 {TMO00845967/2}, please, "threatening
13 and intimidatory tactics".

14 A. So it's saying that we were threatening and intimidating
15 residents, which I didn't think was accurate or true.

16 Q. Right.

17 A. Threatening residents if they didn't co-operate that
18 they'd have no heating, that wasn't true, and that
19 they'd lose their tenancy unless access was granted,
20 none of these things were true. So I felt that,
21 you know, it was important that residents were clear on
22 how we were consulting them and what the issues were,
23 and we certainly weren't threatening people in the way
24 that is suggested here, and I felt that that was quite
25 serious.

33

1 Q. Yes. You say none of these things in this passage were
2 true. You say that now. Did you at the time carry out
3 any investigation into these allegations before writing
4 to Fola Kafidiya the next day?

5 A. The ... some of — this sort of language was used quite
6 commonly at a lot of the Compact meetings, and in the
7 meetings with Mr Daffarn, that they would say — he
8 would say that residents had been bullied and harassed,
9 and without giving any specifics of what that meant,
10 what that was, and there were no specifics given about
11 quite how that was to be the case. And I said I would
12 investigate any specific issues, but these were very
13 broad issues — they were very broad statements which
14 didn't have any truth in them, as far as I could tell,
15 in terms of, you know, we weren't — we didn't say that
16 people would have no heating, and, you know, we knew
17 that that wouldn't be an appropriate thing to do and we
18 wouldn't allow that to happen, and we wouldn't tell
19 people that they would risk losing their tenancies
20 unless they gave access. That just wasn't factually
21 true.

22 Q. Mr Maddison, I understand that. I'm asking you
23 a slightly more specific question.

24 This blog post is posted on 31 March. Stripping
25 away the language in this passage for the moment, just

34

1 take away the language and just look at the bare
2 allegation, which is that TMO/Rydon have told residents
3 that if they do not co-operate they will have no heating
4 from around May 2015 and will lose their tenancies.

5 My question is not whether that's true or not, but
6 whether you personally investigated whether it was true
7 at the time?

8 A. Whether I investigated? I mean —

9 Q. Yes.

10 A. Well, yes. I would have had conversations with the
11 project team and with Rydons about what was being
12 alleged here.

13 Q. Right. Let's break that up.

14 When did you have a conversation with the project
15 team about that allegation?

16 A. At various stages throughout, when this — I mean, at
17 this stage, I'm referring — you know, and my
18 understanding was that these allegations weren't true,
19 and I'd spoken to Rydons and the project team about it.
20 I don't remember specifically when, but there was no
21 truth in those allegations.

22 Q. Yes. So you keep saying. What I'm after is your
23 investigations, your personal investigations in
24 an even-handed manner into whether they were true.

25 So, discussions, let's start with TMO. Who did you

35

1 speak to at TMO about whether this allegation that I've
2 just read to you in the bare terms was made?

3 A. In the TMO I would have spoken to Claire Williams and to
4 David Gibson.

5 Q. Do you remember actually having a conversation and
6 asking them and putting to them the allegation in this
7 blog and saying, "Is there any truth in this?"

8 A. Yeah, I'm sure I would have had that conversation.

9 Q. Well, you say you're sure; do you remember?

10 A. No, I don't remember a specific conversation at this
11 distance.

12 Q. Next one, Rydon. Do you remember speaking yourself to
13 Rydon and asking them whether they've been going round
14 telling residents that if they don't co-operate, they
15 won't have any heating or will lose their tenancies?

16 A. Yes, I'd have spoken to Simon Lawrence about these
17 issues and Simon Lawrence from Rydons came to the
18 meetings with me and the residents from the Compact.

19 Q. Did you actually go to him with this blog and say,
20 "Simon, is any of this true?"

21 A. I don't remember if I specifically did in relation to
22 this blog, but I certainly had conversations with him
23 about these allegations, not necessarily in relation to
24 this blog.

25 Q. Not necessarily in relation to this blog. So are you

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1 saying that these allegations had been made very
 2 specifically before 31 March and you had investigated
 3 them already?
 4 A. No, afterwards.
 5 Q. Afterwards?
 6 A. So subsequent to — so subsequently myself and
 7 Simon Lawrence met with Councillor Blakeman and
 8 residents of Grenfell in Grenfell Tower to discuss the
 9 issues relating to the HIU, and that was where some of
 10 the issues — these issues were raised, and I discussed
 11 them with Simon.
 12 Q. So is your evidence that you investigated the truth or
 13 falsehood of this allegation after you wrote your email
 14 the next day, 1 April —
 15 A. No, no, I'm not tying those two things together. You're
 16 asking me about when I spoke to Rydons. I don't
 17 specifically remember when I spoke to Rydons about that,
 18 but my understanding from, you know, conversations that
 19 I'd had with Rydons and with the project team was that
 20 the issues that were being raised weren't accurate.
 21 Q. You see, in the email I read to you, you are saying and
 22 you highlighted the most serious allegations which you
 23 say are misleading. And my question, and what I'm
 24 trying to understand, is what investigations you
 25 yourself carried out into the truth or falsehood of the

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1 factual allegations before writing the email on 1 April?
 2 A. My response is that I would have spoken to my project
 3 team and the head of service and the contractor, but
 4 I don't specifically remember when, you know, this was
 5 a long time ago now.
 6 Q. Now, let's look at the fourth page of this blog
 7 {TMO00845967/4}, which we looked at, where in the second
 8 paragraph it says Edward Daffarn then informed the
 9 meeting. I've read it out already, I'm not going to
 10 read it out again.
 11 It was true, though, wasn't it, that Grenfell
 12 Community Unite had been refused recognition until
 13 July 2015? So, in other words, at the time of this
 14 blog, which was 31 March 2015, the Grenfell Community
 15 Unite had been refused recognition?
 16 A. I don't know that anybody had been in contact with
 17 Community Unite.
 18 Q. Well, we've seen the January correspondence with
 19 Janet Edwards.
 20 A. With Community Unite or with Edward Daffarn?
 21 Q. With Mr Daffarn.
 22 A. So, you know, that's with an individual, Mr Daffarn.
 23 Community Unite was a group that wasn't recognised, as
 24 I understand.
 25 Q. I take your point.

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1 A. And I think that there are two quite discrete issues
 2 here: one is about the block consultation, about setting
 3 up a separate tenants' association for Grenfell Tower,
 4 which I understood was the objective here, and the
 5 second issue was about having a group or a structure for
 6 engaging with all residents in Grenfell Tower about the
 7 works to their block.
 8 Q. Yes, yes, I take your point. No, not Grenfell Community
 9 Unite, but it was certainly true, wasn't it, that there
 10 had been past attempts by residents to gain a united
 11 voice for the Grenfell Tower community which had been
 12 refused by the TMO? That's the case, isn't it?
 13 A. I don't know.
 14 Q. Well, I showed you the emails earlier in 2015,
 15 January 2015.
 16 A. Well, when you said residents, I saw an email from —
 17 Q. Yes.
 18 A. — the community engagement team and Mr Daffarn, one
 19 resident. I wasn't sure what — whether there were more
 20 residents.
 21 Q. Yes. But it's true, isn't it, that the TMO had
 22 actually, as a fact, refused to recognise a Grenfell
 23 community group in respect of the refurbishment as at
 24 31 March 2015?
 25 A. No, that's not accurate.

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1 Q. You don't think that's accurate?
 2 A. So what is — so you're saying a group, so I think the
 3 group that Janet Edwards was talking to Edward Daffarn
 4 about was about a tenants' association in the block.
 5 The conversation with residents about a consultation
 6 group, we had had a group, we'd had public meetings
 7 from — in the building that had been poorly attended,
 8 we consulted residents on how they wanted to be
 9 attended, and there was no appetite at all from that
 10 consultation for public meetings. So we listened to
 11 what residents were saying and we consulted them through
 12 informal drop-in sessions and newsletters.
 13 Those informal drop-in sessions could be groups of
 14 people, that didn't have to be individual one-to-ones,
 15 there could have been groups of people coming together
 16 at those meetings too. So we were responding to what
 17 feedback we'd received from residents at that stage.
 18 Q. Now, the second email that I wanted to show you before
 19 we get to your later one is at {TMO00846102}. That's
 20 dated 13 April 2015. There it is on the page. You can
 21 see that it's to you, copied to David Gibson, and
 22 Claire Williams forwards you the email that she has
 23 received from Grenfell Community Unite, just below that.
 24 It says in the third line:
 25 "Robert Black walked by on Friday and we discussed

40

1 the fact that the preference was not to meet up with the
2 Grenfell Community Unite group which could be a showcase
3 for Mr Daffarn."

4 Then she asked for comments on her response.

5 Who was it who maintained a preference not to meet
6 with Grenfell Community Unite as a group?

7 A. I don't know.

8 Q. Did you share the preference not to meet with the group?

9 A. At this time, I was working on the basis of the
10 consultation that we'd carried out very recently with
11 residents about how they wanted to be consulted, and
12 from that consultation there was a clear message, to me
13 anyway, at that stage, that there wasn't an appetite
14 from residents for large public meetings of the type
15 that were being suggested here. So I was dubious as to
16 whether this was the right approach.

17 However, in due course, we did listen and we did
18 meet this group. But at that stage, so soon after
19 carrying out a consultation, and having quite — we'd
20 had feedback from more than half of the residents in the
21 block, I didn't think that there was an appetite for
22 this type of meeting.

23 Q. Well, it's not talking about a meeting, it's talking
24 about a meeting with a group. So are you saying that
25 that would be a — what kind of meeting would that be,

41

1 a public meeting or just a meeting between Mr Black and
2 perhaps you with members of the Grenfell Community Unite
3 group?

4 A. I don't know. I think that there was —

5 Q. No.

6 A. — the — there had been a series of public meetings
7 with Grenfell, consulting residents about the proposed
8 works, and those meetings were poorly attended. When we
9 carried out a consultation, which was well responded to,
10 residents showed no appetite for those sort of meetings.
11 However, we did have drop-in sessions that people could
12 come to as individuals or as groups. So there was
13 an opportunity there for people to come and engage. So
14 there was. And so I think that's really what this is
15 flagging up.

16 Q. Well, Mr Maddison, with respect, we're in danger of
17 sliding away into a slightly different subject, which is
18 public meetings. I'm not asking you about public
19 meetings. I'm simply asking you — I'll put the
20 question one more time — whether you shared the
21 preference not yourself to meet with members of the
22 Grenfell Community Unite group.

23 A. I was ...

(Pause)

24 I had questions about whether this meeting was
25

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1 going — what this meeting — the purpose of this
2 meeting was, really. I thought there might have been
3 a different agenda in terms of the

4 residents' association for the block, and I was really

5 working on the basis of trying to consult residents on
6 the basis that we'd agreed with them through the

7 consultation that took place at the turn of the year and

8 that we'd communicated to all residents through the

9 newsletter. So I was just trying to work on the basis

10 of: this is what we've consulted, this is the feedback

11 we've got from you, this is what we're doing, and I was

12 just trying to stick to that, and I felt that this might

13 have been a complicating factor in that.

14 Q. I think the answer is yes, you did share the preference

15 not to meet with members of the group, because — is

16 this right, or is this fair — it would cut across the

17 way you perceived the consultation should go, which is

18 consultation resident by resident?

19 A. Which is what we'd agreed with the residents, yes.

20 Q. What did you understand that Claire Williams meant by
21 the words "which could be a showcase for Mr Daffarn"?

22 A. I'm assuming that she's referring to the fact that
23 Mr Daffarn could dominate public meetings.

24 Q. Was that the really reason that recognition of the group
25 was refused, at least at this time?

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1 A. I don't think the group — recognition of the group
2 wasn't refused.

3 Q. Well, it was until 17 July.

4 A. But we met earlier than 17 July, it was in June.

5 Q. Right. I see.

6 Is it right that before the recognition of the

7 Grenfell Compact on 17 July 2015, tenants could only

8 raise issues or concerns on an individual basis and not
9 collectively?

10 A. There were drop-in sessions, so each — so we would
11 carry out regular drop-in sessions —

12 Q. Yes, sorry, a drop-in session is where a resident talks
13 to a member of the TMO.

14 A. Or many residents.

15 Q. Right. So I'll my question again —

16 A. So the resident drop-in sessions were held in the block
17 in the show flat which we used to demonstrate the works

18 that were going to be carried out. We would communicate

19 to residents through the newsletter saying, "These are

20 the issues that we're going to be discussing at the next

21 drop-in session", and people would come, either as

22 individuals or in households or groups of households as
23 they wished.

24 Q. I understand about groups. Really what I'm after is
25 something slightly different, which is a collective

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1 voice.
 2 Is it right that before the recognition of the
 3 Grenfell Compact in July 2015, tenants could only raise
 4 issues or concerns on an individual basis as opposed to
 5 a collective basis?
 6 A. Erm ... well, they could raise issues on a collective
 7 basis at the drop—in sessions if they wished. There
 8 wasn't a bar on people being able to come together as
 9 a group and talk to us.
 10 Q. But if Mr Daffarn had turned up at a drop—in session and
 11 said, "I represent 46 residents in the building under
 12 the banner of Grenfell Unite", you wouldn't have
 13 recognised him doing that, you would have only said to
 14 him, "Well, I can entertain your personal complaints but
 15 not your collective complaints".
 16 A. And that is the process we took in the Compact too. So,
 17 I mean, even in the Compact, we wouldn't deal with
 18 specific issues to an individual.
 19 Q. Yes, but am I right that before the Compact was formed,
 20 even had Mr Daffarn purported to voice concerns for
 21 a wider group, they wouldn't have been recognised, only
 22 his personal, individual issues and concerns would have
 23 been recognised? That's what I'm getting at.
 24 A. But if an individual raised concerns about the wider
 25 group, we would investigate those concerns with the

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1 wider group.
 2 Q. Now, we can see the response that you give to
 3 Claire Williams. It's in a different email string,
 4 {TMO00846106}, page 1. You're, I think, commenting here
 5 on a draft that she's presented, and you say:
 6 "Thanks for this — I think it is very good.
 7 "A couple of main comments ..."
 8 Then in the second paragraph you say:
 9 "Some redrafting of the following para is needed
 10 (see highlighted section):
 11 "In your email you ask whether the TMO would
 12 acknowledge the Grenfell Community Unite group as
 13 a representative voice of leaseholders and tenants. I
 14 am advised that this group will not be recognised by the
 15 TMO, as there is a Residents Association already in
 16 existence. The TMO are currently working with the
 17 existing Lancaster West Residents Association, and are
 18 currently making arrangements with them to hold an AGM.
 19 Mr Daffarn will have historic communication from the TMO
 20 dating back to early 2014 relating to forming
 21 an alternative residents' group".
 22 Now, it's right, isn't it, that LWRA, the
 23 Lancaster West Residents' Association, was not actually
 24 functioning before the AGM, was it?
 25 A. I don't know.

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1 Q. Do you know what arrangements the TMO was in fact making
 2 for the LWRA to hold an AGM?
 3 A. No, I wasn't involved in that.
 4 Q. Do you know whether one was held?
 5 A. I wasn't involved.
 6 Q. Do you know what steps you took to allow collective
 7 consultation at this point instead of an AGM for the
 8 LWRA?
 9 A. Erm ... we'd consulted residents on how they wanted to
 10 be consulted, and there wasn't an appetite for that
 11 sort of collective engagement.
 12 Q. Let's go then to December 2015, {TMO10011591/2}, please.
 13 I'm sorry, I was going to go back to something,
 14 actually, that I should have done before.
 15 Before I come to that, can I go back, please, to
 16 Claire Williams' email at {TMO00846124}. This is her
 17 response which she sends to Mr Collins and Mr Daffarn.
 18 We've seen the background to it now.
 19 If you go to page 2 {TMO00846124/2}, please, and
 20 look at paragraph 4, I read that to you. That was
 21 in fact, it's right, isn't it, how matters were left in
 22 relation to recognition of a collective group for
 23 a collective voice as of 17 April 2015?
 24 A. Yes.
 25 Q. Yes.

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1 Can I then go to where I'd gone, which is
 2 December 2015, {TMO10011591/2}, please. This is the
 3 minute of an RBKC/TMO joint management meeting,
 4 2 December 2015, and if we just skip back to page 1, we
 5 can see that you were there. There you are identified
 6 as the third from bottom.
 7 If we go back to page 2, we can see that there was
 8 discussion about governance issues on estate management
 9 boards. That's the title there. We can see in the
 10 first paragraph:
 11 "The new RA at Lancaster West are doing very well
 12 and don't appear to be entertaining Eddie Daffarn and
 13 his followers. It has been noted that Eddie Daffarn is
 14 trying to put forward a motion of no confidence in the
 15 TMO and wants to start a new EMB. The EMB pre dated the
 16 TMO and their agreement was signed without legal advice.
 17 This along with the fact that they were not transparent
 18 in their accounts could work to our advantage as they
 19 have £6,000 of debt outstanding."
 20 Pausing there, does that reflect the view at the
 21 time that an EMB was undesirable for the Lancaster West
 22 Estate, so far as the TMO was concerned?
 23 A. I had no involvement with the EMB and didn't have
 24 a view, really. I knew there were historic issues and
 25 the EMB was being disbanded, but other than that I know

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1 no detail.
 2 Q. Very well.
 3 Now, looking at the next paragraph, it says:
 4 "Peter Maddison noted that the Grenfell Compact is
 5 not set up as a RA. Cllr Blakeman and Eddie Daffarn are
 6 a negative force at Grenfell at present and residents
 7 are going to them with problems and not us."
 8 Now, just on that, what was the significance of the
 9 Grenfell Compact not being a residents' association
 10 strictly so-called?
 11 A. It's the point I've been making about the distinction
 12 between a residents' association, so an ongoing
 13 organisation as part of the resident engagement
 14 structure for Grenfell Tower, which I understand that
 15 Mr Daffarn had been campaigning for, for some time, as
 16 opposed to being part of the Lancaster West
 17 Residents' Association.
 18 Q. What did you mean by saying that Councillor Blakeman and
 19 Eddie Daffarn were —
 20 A. Can I just finish that point before we go on to that
 21 one, because the Compact itself was a Compact related to
 22 the works. It was a discrete consultation vehicle for
 23 the works, so it didn't have a broader remit in terms of
 24 the resident engagement strategy.
 25 Q. What did you mean by saying that Councillor Blakeman and

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1 Eddie Daffarn were a "negative force at Grenfell
 2 at present"?
 3 A. So residents were going to them with problems, not us.
 4 So what — Councillor Blakeman had a very complicated
 5 role here, and, you know, I think found it difficult at
 6 times, because she was a member of the housing —
 7 the council's housing and property scrutiny committee,
 8 which gave scrutiny to issues that related to housing.
 9 She was also a member of the TMO board. And what I felt
 10 was that instead of ensuring the scrutiny of our
 11 services to make sure that they were working
 12 effectively, she was telling residents that they
 13 weren't — our systems weren't working effectively, and
 14 so, as a result, the residents were more reluctant to
 15 use those systems than they should have been, and
 16 I think that caused a bit of poor communication.
 17 So some residents would go to Councillor Blakeman
 18 rather than reporting a repair or an issue directly to
 19 either Rydens or to the call centre, and that caused
 20 a bit of a short-circuiting of all of our systems, which
 21 meant that we couldn't sometimes resolve these things as
 22 quickly as we would like.
 23 Q. I can see that that might be procedurally inefficient,
 24 but why was it negative, to use the word that's —
 25 A. I think it damaged the relationship between the

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1 residents and the TMO and it made our systems more
 2 effective (sic) and it increased the risk of things going
 3 wrong. But it also broke down the confidence of —
 4 things going wrong can sometimes be great opportunities
 5 to put things right and build confidence with people.
 6 Q. Councillor Blakeman was actually a TMO board member,
 7 wasn't she?
 8 A. Yes.
 9 Q. So why was it a problem that she was trusted by the
 10 residents and not "us", such that the residents went to
 11 her with their problems?
 12 A. It wasn't a problem that she was trusted by the
 13 residents, it was a problem that she — her role as
 14 a member of the board should have been to give scrutiny
 15 to the processes of the TMO and make sure that we were
 16 held accountable if things weren't working effectively,
 17 and I felt that that wasn't done in this instance.
 18 Q. Why did you think that residents were going to
 19 Councillor Blakeman with their problems rather than
 20 going to the TMO?
 21 A. Can I just be clear, some residents. It's a small
 22 number of — you know, although this did happen, it was
 23 still a small number of residents. Most people would go
 24 to the established communications. So there were —
 25 but — and I think that at some of the meetings, some of

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1 the communications, Councillor Blakeman would say that
 2 these systems don't work, and that would discourage
 3 people from using them.
 4 Q. Yes. Was there any truth in that?
 5 A. Certainly they wouldn't work if we didn't — if they
 6 weren't used effectively, that's a self-fulfilling
 7 prophecy.
 8 Q. The answer to my question is circular.
 9 Was there any truth in Councillor Blakeman's
 10 statement that the systems don't work and it was for
 11 that reason that residents were going to her?
 12 A. There may have been instances where things went wrong,
 13 and — but the system — but the focus on fixing those
 14 issues needs to be through making sure the system works
 15 effectively, and that's really — as a board member,
 16 that's really where Councillor Blakeman had the
 17 opportunity, very good opportunity, through the
 18 operations committee and through the board meetings, to
 19 hold officers accountable, and I gave monthly meetings
 20 to each of those committees and Councillor Blakeman has
 21 an ideal opportunity to raise those concerns.
 22 Q. Coming back to my question, why did you think at the
 23 time, if you did think at the time about this, that the
 24 residents were going to Councillor Blakeman and
 25 Eddie Daffarn with their problems rather than the TMO?

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1 A. I didn't think they were going to Eddie Daffarn with
 2 their problems, I thought it was Councillor Blakeman.
 3 Q. Well, it says here —
 4 A. It says that, but I don't believe that's true.
 5 Q. Okay. Well, rephrasing my question: why did you think
 6 at the time that residents were going to
 7 Councillor Blakeman with their problems rather than the
 8 TMO?
 9 A. I think quantifying this is important. I think this —
 10 we're talking here about maybe a handful of people in
 11 a block of 120 homes, and so there were a small number
 12 of residents who would go directly to
 13 Councillor Blakeman and that would make the process —
 14 because bear in mind we had on site — Rydons had two
 15 resident liaison officers on site all the time for any
 16 issues that people could — residents could contact
 17 those resident liaison officers and issues could be
 18 resolved almost immediately, and then — so there
 19 were — and that's what most people did. In a small
 20 number of cases, we're probably talking six to eight
 21 people, had contacted Councillor Blakeman and she took
 22 that on as case work. But instead of taking it on as
 23 case work, my preference would have been for her to have
 24 asked whether those people have reported their issue
 25 through the appropriate channels first before taking it

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1 on, and that would have been the quickest way of making
 2 sure that we got a repair carried out or got Rydons to
 3 attend site and address the issue.
 4 So I think it was more about — a process issue
 5 here.
 6 Q. I mean, there is no indication in this record that the
 7 number of people going to Councillor Blakeman with their
 8 problems rather than the TMO is only a handful. On the
 9 contrary, the impression one gets, reading this minute,
 10 is that it was a problem, "negative force at Grenfell
 11 at present ... residents are going to them with problems
 12 and not us". Do you think that that's an accurate and
 13 reliable minute or do you say that it overstates the
 14 problem materially?
 15 A. I think it simplifies the problem and I think that the
 16 detail of this can be seen in the review of the project
 17 that was carried out by the board, where it actually
 18 broke down the number of issues that were actually
 19 reported to Councillor Blakeman and how many of those
 20 issues, you know, were dealt with through that process.
 21 Q. Wasn't there a system in place in the TMO — and correct
 22 me if I'm wrong about this — whereby residents could
 23 actually raise concerns with their councillors directly?
 24 A. Yes.
 25 Q. Known as a members' enquiry?

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1 A. Yes.
 2 Q. So the fact that some people were doing that with
 3 Councillor Blakeman, why would that be a problem, if it
 4 was in fact part of the procedures which residents could
 5 use?
 6 A. Normally, though, I would expect that residents would
 7 report an issue to a councillor through a members'
 8 enquiry if something's gone wrong. If it's the first
 9 point of contact, so something's broken and needs to be
 10 fixed, it would be better and simpler to report it
 11 direct to the call centre or to Rydons to carry out the
 12 repair, rather than raising it as a members' enquiry,
 13 which is more akin to dealing with it as a complaint.
 14 Whereas actually — so that's the distinction I would
 15 make.
 16 Q. So in fact it's right that there were actually two
 17 available routes of complaint for a resident: one is the
 18 complaints procedure, where it's a complaint properly
 19 so-called as opposed to an enquiry, and the other was
 20 directly to a councillor?
 21 A. Yes.
 22 Q. I see.
 23 Looking at the next paragraph in this minute, it
 24 says:
 25 "Cllr. Blakeman has also presented a petition with

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1 60 signatures about our management at Grenfell and
 2 compensation for residents. Amanda Johnson feels that
 3 it is a conflict of interest for Cllr. Blakeman as she
 4 is a Council Appointed TMO Board Member.
 5 Fola Kafidiya—Oke suggested that Amanda Johnson speaks
 6 to Laverne about this as it needs to be urgently
 7 addressed."
 8 Why were there concerns about Councillor Blakeman
 9 presenting a petition on behalf of residents?
 10 A. I don't remember the petition.
 11 Q. You don't remember the petition?
 12 A. Specifically, from this, I don't remember.
 13 Q. Right.
 14 Well, looking then at the question of the conflict
 15 of interest, if we can go back to the previous page,
 16 please, page 2, Amanda Johnson is recorded as saying
 17 that she felt that there was a conflict of interest. Do
 18 you know what the conflict of interest identified by
 19 Amanda Johnson was?
 20 A. I don't remember.
 21 Q. Right. Was there an expectation that TMO board members
 22 would not question TMO employees, do you think?
 23 A. No, no, I mean, I think the whole structure of the TMO
 24 board and the committees was to be accountable and to be
 25 held accountable by board members, so I think that

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1 probably what Amanda's — well, I don't know, I can't
 2 guess, I can't speculate on what Amanda was thinking.
 3 Q. Right. This may be a question for Ms Johnson, but can
 4 you explain how there could possibly have been
 5 a conflict of interest for Councillor Blakeman to
 6 represent the interests of residents if it was the case
 7 that the TMO existed to serve the residents?
 8 A. Sorry, could you —
 9 Q. Well, how could there be a conflict of interest for
 10 Councillor Blakeman to seek to represent the interests
 11 of residents if the TMO existed to serve them?
 12 A. I think this is a question for Amanda or Fola.
 13 Q. You were at the meeting. Were you puzzled by what this
 14 topic was about at the time?
 15 A. No, I don't remember —
 16 Q. I see.
 17 A. — thinking about it very deeply, I'm afraid.
 18 Q. I mean, do you accept that the residents were — and
 19 I use the word in inverted commas — "customers" of the
 20 TMO?
 21 A. Sorry?
 22 Q. Do you accept that the residents were "customers" —
 23 A. Yes.
 24 Q. — of the TMO? And do you accept that it was the TMO's
 25 role to provide your customers with the best service and

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1 satisfaction you could, acknowledge your errors and try
 2 and find solutions?
 3 A. Yes.
 4 Q. Did it occur to you at the time — maybe you can't
 5 remember — that Amanda Johnson's very suggestion of
 6 a conflict of interest on the part of
 7 Councillor Blakeman revealed an "us and them" culture at
 8 the TMO?
 9 A. I think there were some complications in the way that
 10 Councillor Blakeman interacted, because she had three —
 11 she was a local ward councillor, she was a member of the
 12 TMO board, and she was — she sat on the council's
 13 property and scrutiny committee, and I think that there
 14 are subtleties around that relationship which I think
 15 Councillor Blakeman struggled with.
 16 Q. Do you remember discussing those at the time with
 17 anybody?
 18 A. I raised them — those sort of issues a number of times
 19 with the company secretary, because I felt that there
 20 were times where Councillor Blakeman could have been
 21 helping bring about a resolution rather than — whereas
 22 I felt that at times she created the divide.
 23 Q. Right.
 24 What were the subtleties around the relationship, as
 25 you put it, that she struggled with?

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1 A. Well, I think that ...
 2 (Pause)
 3 So I think her role as a board member and as
 4 a member of the operations committee too, she was in
 5 a position to be able to hold TMO officers to account
 6 and ensure that our services were working as effectively
 7 for residents as possible, and I felt that sometimes her
 8 actions meant that residents were less inclined to have
 9 confidence in our services because of the negative
 10 portrayal of Councillor Blakeman of those services, and
 11 I don't think that portrayal was accurate.
 12 I had a number of bits of correspondence with
 13 Councillor Blakeman directly about these sort of issues,
 14 and, you know, sometimes she would produce minutes of
 15 meetings without any agreement that would be inaccurate,
 16 they would be saying that I'd agreed things that
 17 I hadn't agreed, and I had dialogues with
 18 Councillor Blakeman on these sort of things.
 19 So it was about sending out clear messages, really,
 20 because she had more than one hat as a councillor and as
 21 a member of the TMO board, and I felt that it's very
 22 difficult, if you've got a board member and a ward
 23 councillor who is saying this is what's been agreed when
 24 it wasn't what had been agreed with me at all.
 25 So they are the sorts of things which I think were

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1 very difficult, and it was causing distrust.
 2 Q. Do you accept that there could only be a conflict of
 3 interest as between the TMO and a councillor
 4 representing the interests of the residents if there was
 5 in fact a conflict between those divergent interests?
 6 A. I'm sorry, I don't know that I can comment on that.
 7 MR MILLETT: All right.
 8 Mr Chairman, is that an appropriate moment for
 9 a break?
 10 SIR MARTIN MOORE-BICK: Yes, Mr Millett, I think it is.
 11 We'll have a break now, Mr Maddison. We will come
 12 back, please, at 11.40, and as before, please don't talk
 13 to anyone about your evidence or anything relating to it
 14 while you're out of the room.
 15 THE WITNESS: Thank you.
 16 SIR MARTIN MOORE-BICK: All right? Thank you.
 17 (Pause)
 18 Thank you, 11.40, please.
 19 (11.24 am)
 20 (A short break)
 21 (11.40 am)
 22 SIR MARTIN MOORE-BICK: All right, Mr Maddison, ready to
 23 carry on?
 24 THE WITNESS: Yes, thank you.
 25 SIR MARTIN MOORE-BICK: Thank you very much.

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1 Yes, Mr Millett.
 2 MR MILLETT: Mr Maddison, can I ask you now to go to
 3 {RBK00032130}. This is a minute of a meeting of the
 4 housing and property scrutiny committee on
 5 6 January 2016, as you can see from the top right-hand
 6 corner of the document. We can see that you were in
 7 attendance, five names up from the bottom of the "Others
 8 in Attendance" list.
 9 Do you have an independent recollection of this
 10 meeting? Just to jog your memory, it was a meeting at
 11 which Mr Daffarn addressed the committee.
 12 A. Yes.
 13 Q. You do.
 14 Now, if we go, please, to page 4 {RBK00032130/4}, we
 15 can see that you yourself made a presentation to the
 16 committee on the subject of the Grenfell Tower
 17 refurbishment project.
 18 If you look at page 5 {RBK00032130/5}, you can see
 19 the outcome of the discussion. Right at the foot of the
 20 section, just before A5, do you see that it says:
 21 "In conclusion the Chairman agreed that a Working
 22 Group would be commissioned at some point in the future
 23 but that this was dependant on a number of factors
 24 including the conclusion of existing Working Groups and
 25 the review work conducted by the TMO."

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1 If you go back up the page a little bit further, you
 2 will see the previous paragraph says:
 3 "Cllr Blakeman said to the Committee that a number
 4 of people did not understand the complaints procedure
 5 and often things had been implemented before the
 6 complaint had been addressed. She explained that there
 7 was no mechanism for collective complaints, for example
 8 when a lift wasn't operational or lack of CCTV. The
 9 Chairman asked if there was a procedure for collective
 10 complaints or if each individual had to log a complaint
 11 separately. He suggested there may be a gap in
 12 governance in this respect as there should be a process
 13 to allow a group to complain and permit the aggregation
 14 of a complaint. He recommended that the TMO look at
 15 their procedures in this regard. Mr Black agreed to do
 16 this."
 17 Now, can we take it from the minutes that the main
 18 issue there identified was the lack of a process for
 19 collective complaints; yes?
 20 A. Yes.
 21 Q. But also that any review would depend on the outcome of
 22 a review by Mr Black and by the TMO board itself?
 23 A. Yes.
 24 Q. Yes.
 25 Moving on from this, then, can we go to

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1 {TMO00852865}. This is an email to you from
 2 Sacha Jevans of 3 March 2016. There it is, copied to
 3 others, including Yvonne Birch. Subject, "Grenfell
 4 Board Review". She says:
 5 "Hi
 6 "I summarise ... the outcome of the scoping meeting
 7 and clarify what information is required in the pack and
 8 what information should be covered in the presentation.
 9 I have spilt it into the sections from Eddie's Speech.
 10 Paperwork for the pack ..."
 11 And then a list.
 12 Just placing this in its chronological context, is
 13 it right that this is now early March, there had been
 14 a scoping meeting to scope out the, in loose terms,
 15 terms of reference for the TMO board review of the
 16 complaints made by Mr Daffarn? Is that right?
 17 A. I don't remember.
 18 Q. You don't remember. Right. So you don't remember what
 19 she means by the scoping meeting there?
 20 A. No.
 21 Q. Oh, okay. Right.
 22 In the first block under 1 she says, "Resident
 23 engagement", and she wants, among other things, first
 24 bullet or asterisk:
 25 "Time line of all the resident consultation meetings

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1 that took place."
 2 Then six down you can see she wants:
 3 "Minutes of any consultation or compact meetings."
 4 Do you see that?
 5 A. Yes.
 6 Q. Let's just see how this proceeds.
 7 Can we go, please, to {TMO10044817/2}. This is
 8 an email from you to Gillian Kennedy which, if you go
 9 over to page 3 {TMO10044817/3}, you can see you're
 10 forwarding David Collins' email to Claire Williams
 11 asking for a meeting to discuss the construction works.
 12 That's his 6 April email. So that's the context.
 13 If we go to page 1 of this email run
 14 {TMO10044817/1}, you say to her, second email down on
 15 page 1, 4 March 2016:
 16 "Hi Gillian
 17 "On reflection I'm not sure that I want to go into
 18 so much detail on the Compact Strand.
 19 "I think I will produce a summary report with
 20 a timeline, schedule of meetings and a brief summary of
 21 the issues ..."
 22 So this has sort of come in on an email chain from
 23 the year before, but is the day after Sacha Jevans'
 24 email to you with her shopping list of things from the
 25 scoping meeting. That's the chronology.

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1 Now, what I want to ask you about is the text of
 2 your email to Gillian Kennedy.
 3 Is it right Gillian Kennedy was co-ordinating the
 4 TMO board's review? Do you remember that?
 5 A. I don't know if she was or not or whether she was just
 6 pulling together some of the pieces from my team or from
 7 Sacha's team.
 8 Q. Right, all right.
 9 Now, let's go to the text on page 1 I want to ask
 10 you about on the screen.
 11 What was the problem with giving the board the
 12 detailed records, such as they were, of the meetings
 13 rather than your own brief summary, as you were
 14 suggesting here?
 15 A. Erm ... I'm not sure. I don't have any recollection of
 16 this.
 17 Q. Right. Were you looking to omit things?
 18 A. No, certainly not.
 19 Q. Were you looking to present them in a particular way?
 20 A. No. I mean, is there a previous email to this, to give
 21 me a bit of context? Because I can't really remember
 22 what we were talking about.
 23 Q. Yes, there is, and I've shown it to you. It's the email
 24 of 3 March, the day before, from Sacha Jevans to you
 25 asking you for the minutes of any consultation or

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1 Compact meetings, and you seem to be sending this back
 2 to Gillian Kennedy saying, as I've shown you in the
 3 text:
 4 "I'm not sure that I want to go into so much detail
 5 on the Compact Strand.
 6 "I think I will produce a summary report with
 7 a timeline, schedule of meetings and a brief summary of
 8 the issues discussed."
 9 And I just wanted to know why that was?
 10 A. I've no idea.
 11 Q. Right.
 12 We do see that that is something to which she
 13 agrees, if you go to the top of page 1. She just says:
 14 "Hi Peter
 15 "Will do.
 16 "I am just updating the summary of issues then will
 17 send over."
 18 A. I mean, the only thing I can think of is that some of
 19 the minutes, for want of a better word, of the Compact
 20 meetings might be a set of exchanges of emails, so it
 21 might be easier, rather than giving people a whole set
 22 of email interchanges, to summarise the points. That's
 23 all I can imagine.
 24 Q. Right. You're imagining; you don't remember?
 25 A. I don't remember.

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1 Q. Right.
 2 Let's look then at {TMO00829803}. This is the final
 3 pack on the consultation subject presented to the TMO
 4 board as part of the review, and if we look at the mini
 5 chronology on that page, we can see that what is sent is
 6 "Meeting notes and actions, 16 July 2015", so that's the
 7 first date on which these documents begin and runs down
 8 to February 2016.
 9 Is it right that you decided not to include
 10 David Collins' emails of 17 March and 25 March 2015 and
 11 the 6 April email that I've shown you just now in
 12 relation to the matters he was raising?
 13 A. I don't think I made a conscious decision not to.
 14 I mean, I think these are strictly speaking the notes of
 15 the Compact meetings, and they weren't Compact meetings,
 16 that was a dialogue with an individual.
 17 Q. Do you remember receiving emails in March from
 18 David Collins or seeing them at the time sent to
 19 Claire Williams requesting recognition of Grenfell
 20 Community Unite?
 21 A. Yes, I do remember.
 22 Q. Yes. Do you know why you didn't put those into the pack
 23 sent to the TMO board to review?
 24 A. I don't.
 25 Q. Right.

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1 Do you remember making a conscious decision to leave
 2 them out?
 3 A. No.
 4 Q. Nor did you include the minutes of the residents'
 5 meetings which were enclosed in those emails, did you?
 6 A. I don't think we — I wasn't aware we had records of
 7 resident meetings, other than these.
 8 Q. Right.
 9 Well, let's just look at a reference, chase this
 10 down, {TMO10044821}, please. This is an email, in fact,
 11 which you send to yourself in March 2016, just a day or
 12 two — in fact the next day, actually, after you had
 13 decided not to send the minutes of the meeting but to do
 14 a summary instead. Do you see that this is the
 15 chronology? And you send it to yourself, but below it
 16 we can see March 2015.
 17 If you scroll down, you can see at the bottom of
 18 page 1 you've got Claire Williams' email to you of
 19 26 March. Over the page to page 2 {TMO10044821/2} she
 20 tells you you had minutes of the meeting, and then you
 21 can see, perhaps if we scroll down to page — it's quite
 22 a long email, but we can look at it starting at page 2,
 23 you can see this is David Collins' email of 25 March to
 24 Claire Williams:
 25 "Hi Claire,

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1 "Ed has provided the minutes of the resident's
 2 meeting (see below). Can you now respond on all points
 3 raised?"
 4 Et cetera. It's quite a long email. Then the
 5 minutes appear at page 2 and go on over through to the
 6 top of page 6.
 7 So you had in front of you this document, it
 8 appears, at the time when you were considering putting
 9 together or assisting on the putting together of the
 10 pack for the TMO board's review.
 11 Just showing you that again, do you remember making
 12 a conscious decision, revisiting that document of the
 13 year before, to leave it out of the pack?
 14 A. No.
 15 Q. Can you explain why you left it out of the pack?
 16 A. I wasn't putting the pack together, but I don't have any
 17 recollection.
 18 Could you just show me my first email?
 19 Q. Yes.
 20 A. The one where I sent it to myself.
 21 Q. Yes, it's page 1 {TMO10044821/1}, at the top,
 22 5 March 2016. So the chronology is that Sacha Jevans
 23 writes to you on 3 March —
 24 A. Can I just see the bit below that.
 25 Q. Of course. If you ask for the —

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1 A. Can I see the bit where Claire says "Peter".
 2 Q. Yes, bottom of page 1, over to the top of page 2
 3 {TMO10044821/2}, I think that's where we want to go.
 4 Then the third paragraph is where the minutes start, on
 5 page 2. This is the email from David Collins. Is that
 6 what you want to look at?
 7 A. No, no, I was trying to — I've got no recollection of
 8 this, I'm afraid.
 9 Q. Take your time and look at it if it helps.
 10 A. I don't think it's going to remind me.
 11 Q. Okay, all right.
 12 Do you agree, though, that the net effect of leaving
 13 out this document from the package was to omit
 14 residents' concerns about the refusal to meet with
 15 residents between March 2015 and July 2015?
 16 A. I don't know whether that was included in the pack or
 17 not, I've no idea.
 18 Q. Let's go then to a different document, {MET00045762},
 19 please. This is the matrix of complaints or issues, the
 20 first of two. This one is dated August 2015. There was
 21 a later one in May 2016, into which Councillor Blakeman
 22 had had input. This document was also not provided to
 23 the TMO board. Do you know why that was?
 24 A. No.
 25 Q. Did you know that the TMO board had concluded that there

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1 were only seven complaints about the refurbishment, but
 2 this document, do you agree, would suggest that there
 3 were rather more?
 4 A. Well, not necessarily. So I think there was — I think
 5 the seven formal complaints were complaints that under
 6 the definition of the policy were issues that weren't
 7 resolved, whereas this was a dialogue between myself and
 8 the Compact regarding issues that they'd raised, and so
 9 this — I would hope that some of these things were
 10 agreed. So it wasn't a complaint, it was something that
 11 was agreed and some stuff that we'd already done, so
 12 this was part of a dialogue between myself and the
 13 residents of the Compact.
 14 Q. Yes.
 15 Was it not important for the TMO board when
 16 conducting their review to have seen this document?
 17 A. I think it would have been useful, yes.
 18 Q. Would have been useful; it would have been essential,
 19 no?
 20 A. I think it would have helped.
 21 Q. Right.
 22 {TMO00830759}, please. This is the minute of
 23 a review meeting on 12 March 2016.
 24 Now, do you remember attending this? You're not
 25 listed there.

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1 A. No. I attended, because we did a tour of the building,
 2 and so I was there to do a tour of the building, but
 3 I didn't sit in the panel itself.
 4 Q. I see. So you were there to tell them about the tour?
 5 A. To conduct the tour, yes.
 6 Q. Oh, I see. Forgive me. You said to conduct the tour.
 7 Tell me how the day went. There was a review
 8 meeting. It looks as if it was held in the boardroom,
 9 but did you leave the boardroom and go to the tower?
 10 A. Yeah.
 11 Q. How long did you spend at the tower?
 12 A. A couple of hours, I'd have thought.
 13 Q. Did you speak to anybody at the tower?
 14 A. I can't remember, to be honest.
 15 Q. Did you speak to any residents?
 16 A. I don't remember.
 17 Q. Was there any system set up whereby you could meet the
 18 residents and get their views face to face during this
 19 review tour?
 20 A. I don't remember what the format of the meeting was at
 21 all.
 22 Q. Okay.
 23 Did you have or had you had any discussion with
 24 Sacha Jevans about which, if any, residents the TMO
 25 board should meet?

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1 A. No. I don't remember.
 2 Q. Do you know why the board didn't meet with
 3 Grenfell Compact or any member of Grenfell Compact when
 4 conducting the review?
 5 A. I don't.
 6 Q. Let's see if we can look at another document and prompt
 7 your recollection of this.
 8 Can we please look at Judith Blakeman's police
 9 statement, {MET00045751}, please. I'll show you the
 10 first page, and then go to page 9.
 11 That's the first page of her statement dated
 12 28 June 2019.
 13 Can we go to page 9 {MET00045751/9}, please, and
 14 look down at the second paragraph. She says there in
 15 the second line:
 16 "I understand that this review was carried out on
 17 a Saturday, starting with a desk top review of some of
 18 the associated paperwork. After the desk top review,
 19 the sub-committee visited Grenfell Tower, although
 20 I believe that they did not speak to any of the
 21 residents who had complained about the works to their
 22 flats. Further I believe that they only looked at the
 23 new flats that had been created on the new lower floors,
 24 and not the original flats, including those of which
 25 complaints had been made. They did look at the other

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1 new additions to the Tower — the nursery and the boxing
 2 club. The report also said that only seven complaints
 3 had been made during the refurbishment."
 4 Is it right that the review group didn't in fact
 5 speak to any residents as part of its investigation as
 6 she says?
 7 A. I don't remember. I have got a recollection of going
 8 into residents' homes with other parties and I just
 9 can't remember whether we did it as part of this or not.
 10 Q. Right. You can't recall.
 11 Was there a decision beforehand about which flats
 12 you should and which flats you shouldn't or wouldn't or
 13 weren't going to visit?
 14 A. I would have thought whatever — the itinerary would
 15 have had to have been set in advance and agreed, so —
 16 Q. Exactly. Do you remember that?
 17 A. I wouldn't have been organising it, I was literally just
 18 there to help with the orientation around the building.
 19 Q. Her recollection, as I've read to you, is that the group
 20 only looked at the new flats on the other lower floors
 21 and not the original ones in respect of which complaints
 22 had been made.
 23 A. As I say, I wasn't —
 24 Q. My question is: do you say she is wrong about that?
 25 A. I don't know.

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1 Q. Right.
 2 A. Councillor Blakeman wasn't there, so ...
 3 Q. Now, it's right, isn't it, that residents had no other
 4 input into the TMO board internal review before it was
 5 submitted to the board?
 6 A. As I say, I wasn't involved in it, I don't know.
 7 Q. Right. Well, from what you could see and did know
 8 about, which, as you have told us, seems to have been
 9 quite limited, from that perspective, is it right that
 10 residents had no other input into the TMO board internal
 11 review?
 12 A. I can only say I don't know.
 13 Q. Right.
 14 Now, can I ask you about a slightly different topic,
 15 {TMO00852922}, please. This is a brief self-contained
 16 topic about this meeting.
 17 This is a meeting of the TMO or joint ET/SMT meeting
 18 on 14 April 2016 at which you're present. You can see
 19 your name in the list on page 1 there.
 20 If we go to page 6 {TMO00852922/6}, please, there is
 21 an agenda item number 7, which is "AOB", and it says
 22 there:
 23 "RB. Elections coming up. Janet and Fola to do
 24 feedback on the Resident Capacity Training.
 25 "Fay restarting. Anne, Kush not said. Brendan not

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1 Debrah[sic] not well.
 2 "Tony retiring Peter Chapman retiring.
 3 "Maria has showed us the problem of not getting good
 4 quality candidates. Is Eddie Deffarn[sic] a member,
 5 what if he put himself forward.
 6 "If you know of any good person please put their
 7 names forward."
 8 Do you remember what the problem was concerning
 9 identifying good quality candidates?
 10 A. I don't.
 11 Q. What would be a good quality candidate, do you know?
 12 A. I'm sure there was a specification for the role, but
 13 that was something that the executive team and the
 14 company secretary would be involved in.
 15 Q. Right.
 16 Can you explain why it was that the question was
 17 asked: is Eddie Daffarn a member, what if he put himself
 18 forward?
 19 A. I don't.
 20 Q. Was there a plan to prevent him becoming a candidate for
 21 the TMO board?
 22 A. I've got no idea.
 23 Q. Was there a risk or a view that he might?
 24 A. I've no idea.
 25 Q. You don't know.

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1 Can we just look very briefly at the next document,
 2 {TMO00852958}, please.
 3 Before you leave that, you'll note it's a draft.
 4 I'll show you the final version or a further draft.
 5 Here is the next document, also a draft. If we go
 6 to page 4 {TMO00852958/4}, we can see under "AOB" that
 7 the reference is Eddie Daffarn has been removed, or
 8 rather it isn't there. Can you explain why that is so?
 9 A. No.
 10 Q. Can we then turn to a different topic, please, which is
 11 the complaints process itself.
 12 Can I take you to {TMO00831399}. This is the
 13 complaints policy which we looked at, I think, last
 14 week.
 15 The policy itself starts on page 2 {TMO00831399/2}.
 16 If you look at paragraph 1.1, I showed you that last
 17 week.
 18 If we then scroll down to page 5 {TMO00831399/5},
 19 you can see that there is the complaints procedure
 20 itself, and you identify the three stages — or you
 21 don't, but this document does, identify the three stages
 22 to the complaints procedure: stage 1, stage 2, stage 3,
 23 and then after that.
 24 On page 8 {TMO00831399/8} there is a complaints
 25 procedure diagram with the three steps in it.

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1 Then at page 9 {TMO00831399/9} you've got the
 2 complaints guidance for staff.
 3 Were you familiar with the complaints guidance for
 4 staff as a document?
 5 A. No.
 6 Q. You weren't? Did you ever look at it?
 7 A. I don't recall.
 8 Q. You don't recall ever looking at it?
 9 A. No. I'd have spoken — I'd have been briefed by the
 10 complaints team about the policy and the approach, but
 11 I wouldn't necessarily have read this.
 12 Q. Right.
 13 Looking at paragraph 1.1, it says:
 14 "We expect all managers to be familiar with the
 15 Complaints Policy and associated procedures and as
 16 appropriate, ensure that their staff understand the
 17 procedure and their role in applying it effectively and
 18 in line with the organisation's values and behaviours."
 19 You may not have been familiar with the text, but
 20 were you familiar with the principle —
 21 A. Yes.
 22 Q. — encapsulated in paragraph 1.1? You were.
 23 How would you describe or how do you describe your
 24 role in responding to residents' complaints?
 25 A. My role was about ensuring that complaints were resolved

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1 as quickly and effectively as possible, so I had
 2 an overview of the complaints that came into my team.
 3 Q. Right.
 4 A. And I had a role in — it would vary depending on
 5 various circumstances, but I would have a role of
 6 generally overseeing and ensuring that complaints were
 7 dealt with promptly and efficiently.
 8 Q. Right. Let me just understand that evidence a bit more
 9 closely.
 10 You say your role was about ensuring that complaints
 11 were resolved, so you had an overview of the complaints
 12 that came into your team. That's the assets and
 13 regeneration team?
 14 A. Yes.
 15 Q. Did you have a wider role in overseeing the operation of
 16 the complaints procedures and policies generally?
 17 A. No, that was — so the — there was an independent
 18 complaints team.
 19 Q. Yes.
 20 A. A team of three people, as I remember, who managed the
 21 process, and they reported in to the director of
 22 property and — sorry, the director of people.
 23 Q. Director of people? Sorry.
 24 A. Sorry, Yvonne Birch, I can't remember exactly her title.
 25 Q. I see.

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1 Did Yvonne Birch or her team ever challenge you on
 2 you or your team's decisions about complaints?
 3 A. Yes, they would have scrutiny and overview of all of the
 4 process and would comment.
 5 Q. Right.
 6 A. Sometimes some complaints would go across departments,
 7 so there needed to be a bit of co-ordination at times as
 8 well.
 9 Q. So when a formal complaint was raised about your group,
 10 your department, were you the one responsible ultimately
 11 for responding to that complaint or was that
 12 investigated independently?
 13 A. Sorry, could you ask that again?
 14 Q. Yes. When a formal complaint was raised about your
 15 group or your department, were you the one ultimately
 16 responsible for responding to the complaint or was it
 17 investigated independently?
 18 A. It depends on the nature of the complaint to some
 19 extent, but generally if a complaint came in about
 20 a piece of work that was being carried out, the head of
 21 service responsible for that area would generally deal
 22 with that complaint, and I would have an overview —
 23 I wouldn't necessarily see all complaints, but I would
 24 have an overview of how many complaints there were and
 25 how quickly they were responded to. And if they were

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1 escalated through the process, I would generally deal
 2 with stage 2 complaints, but sometimes there was a bit
 3 of fluidity around that.
 4 Q. Right. So is it right that the head of service would
 5 respond to complaints about the service for which they
 6 were responsible?
 7 A. Yes.
 8 Q. I see.
 9 So on what occasions would there ever be independent
 10 investigation of the complaint?
 11 A. Well, there was independent scrutiny throughout, through
 12 the complaints team. So they would review all
 13 complaints, so there was always some scrutiny.
 14 Q. Right.
 15 A. But to get the matter resolved as quickly as possible,
 16 the head of service would be the person who would enable
 17 that — whatever issue was being raised to be addressed
 18 as effectively and as quickly as possible.
 19 Q. Now, looking at paragraph 2.1 on this page, under "Roles
 20 and Responsibilities", we can see the role of the
 21 complaints team, their responsibilities, and at
 22 paragraph 2.2, managers' responsibilities. That
 23 includes, if you look at it, if we turn to page 10
 24 {TMO00831399/10}, third bullet point down:
 25 "Investigating complaints and identifying

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1 appropriate actions to remedy any service failure."
 2 How were you expected to investigate any complaint?
 3 A. It depends on the nature of the complaint, really, but
 4 normally it would be about gathering information and —
 5 Q. Right.
 6 A. — understanding what the issue is, and coming to
 7 a resolution as to how it best could be resolved.
 8 Q. Did that include meeting with the complainant in order
 9 to find out more details about the subject matter?
 10 A. Sometimes, or commonly speaking to the complainant.
 11 Q. Looking at paragraph 3.1 "Resolving Complaints":
 12 "KCTMO expects that when we have got something
 13 wrong, that we acknowledge this and promptly rectify the
 14 problem, and notify the complainant accordingly. We
 15 understand that sometimes staff may view a complaint as
 16 a personal criticism. This is not usually the intention
 17 from the complainant's perspective; they usually just
 18 want something done about what it is that they are
 19 complaining about. As such, it is important that staff
 20 do not respond negatively and defensively, but instead
 21 look at the opportunity that might arise from
 22 a complaint to improve the services we provide."
 23 Did you understand, even if you weren't familiar
 24 with the text here, that principle?
 25 A. Yes, and I agree.

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1 Q. You agree.
 2 If we go down to page 11 {TMO00831399/11}, we could
 3 see paragraph 4.1, under the heading "Recording and
 4 Monitoring the Complaint":
 5 "Anyone who receives what they think is a complaint
 6 is responsible for promptly forwarding this to the
 7 Complaints Team via phone or email to
 8 complaints@kctmo.org.uk. On receipt of the complaint
 9 the Complaints Team will usually identify whether it is
 10 a complaint or service request, contact the complainant
 11 within two working days to acknowledge receipt, ensure
 12 they understand the complaint and let the complainant
 13 know what will happen next."
 14 Did you send all possible complaints, by which
 15 I mean all complaints that potentially qualified as
 16 complaints, to the complaints team as a matter of
 17 practice?
 18 A. Yes, they would normally come via the complaints team.
 19 Q. Did the complaints team provide guidance on whether the
 20 matter was in fact a complaint properly so-called or
 21 a service request properly so-called?
 22 A. Yes, broadly.
 23 Q. Now, against that general background, let's look at
 24 {TMO00831285}. I just want to look at a particular
 25 complaint from GTLA. This one is 9 November 2013.

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1 We start on page 5 of this email run
 2 {TMO00831285/5}, please, which has that date on it, and
 3 it's an email on the second half of that page from the
 4 Grenfell Tower Leaseholders' Association, dated
 5 9 November, to Robert Black, and copied to a list of
 6 people you can see in blue there on the screen.
 7 It is said to Mr Black, if you turn the
 8 page {TMO00831285/6}:
 9 "Dear Mr Robert Black,
 10 "We write to you in reference to the email dated
 11 14th October 2013 instead of Mr Peter Maddison due to
 12 the fact that he has joined the KCTMO early this year
 13 and our issues and concerns we submitted to the
 14 T—complaint procedure (stage Two) almost decade old
 15 complaints. We expect either you to deal with it and we
 16 are also very much exhausted to deal with Mr Daniel Wood
 17 and Janice Pretorius of homeownership department and
 18 their lack of commitment and arrogance to deal with our
 19 serious issues and concerns."
 20 Now, there is then a long list of topics which go on
 21 over the next few pages, including, I should just pick
 22 up, at page 7 {TMO00831285/7}, "Refurbishment of
 23 Grenfell Tower" as one of the topics towards the bottom
 24 of your screen.
 25 Just picking this point up while we're on it, in the

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1 seventh line down, they say:
 2 " ... it is logical to consult the residents and the
 3 stakeholders of LWE on design, but it is not so much
 4 about the colour of the cladding and window that must be
 5 left to the designer if KCTMO want the KALC project to
 6 complement the GTRP. There has been more consultation
 7 on the design of GTRP than KALC project when in fact the
 8 KCTMO have messed up the planning application 7 times."
 9 Then there are various other matters discussed in
 10 relation to the refurbishment. That's just as
 11 an example of what's been raised here.
 12 Then if we go back to page 4 at the foot of the
 13 page, over to the top of page 5 {TMO00831285/5}, where
 14 the email starts and splits, you can see that at the
 15 bottom of page 4 you send this email to Robert Black, or
 16 rather you write to Robert Black, and over the top of
 17 page 5 you say:
 18 "Robert
 19 "We have agreed with RBKC that we will direct
 20 Mr Adoweru [you have misspelt his name] through our
 21 complaints procedure.
 22 "We have been through Stages 1 and 2 and this should
 23 be treated as a Stage 3 complaint."
 24 My question is: having shown you all of that, who
 25 decided that the complaint would be directed through the

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1 complaints procedure?
 2 A. I don't know.
 3 Q. You say here that "We have been through Stages 1 and 2".
 4 Was that correct?
 5 A. I don't recall the ... I'm not sure specifically related
 6 to this. I must have formed that view for some reason,
 7 and we must have responded.
 8 Q. Right.
 9 A. We ... the way that the leaseholder association
 10 communicated, as you can see, was to copy a broad range
 11 of people in, and I think it sounds to me as if there's
 12 been a conversation here about — you know, obviously
 13 this is — it's been copied in to more than one
 14 organisation as well, so there has obviously been
 15 a conversation about which is the most appropriate route
 16 to deal with the issues being raised.
 17 Q. If we go to page 2 in this email chain {TMO00831285/2},
 18 after some discussions with Joanne Burke about it being
 19 a three-stage process, we can see that here is an email
 20 from you to Janet Seward and Joanne Burke and
 21 Daniel Wood of 14 November 2013, and it says:
 22 "Janet
 23 "Attached are the Stage 1 & 2 [responses] to
 24 Mr Awoderu.
 25 "I also attach the various correspondence we have

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1 received from him."
 2 It looks from that as if in fact this complaint or
 3 set of complaints had actually been through stages 1
 4 and 2 and you were on top of that. Is that right?
 5 A. It looks like it's — that looks — it looks like there
 6 has been a stage 1 and stage 2 response. I don't know
 7 who did those responses.
 8 Q. Right. So you don't remember doing them yourself, or
 9 dealing with them yourself?
 10 A. Without seeing the specifics, I've no recollection.
 11 Q. Do you know what investigations had been carried out
 12 into the heads of complaint raised by the GTLA?
 13 A. It would be all detailed in the correspondence with the
 14 GTLA.
 15 Q. Do you know what the difference was between the stage 1
 16 and stage 2 processes so far as these complaints were
 17 concerned?
 18 A. Well, I understood what stage 1 and stage 2 processes
 19 were, yes.
 20 Q. No, no, that's not my question.
 21 A. I don't remember the specifics of these — if I could
 22 see the —
 23 Q. Right.
 24 A. If I could see the correspondence, I might be able to
 25 help, but I can't remember them.

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1 Q. My question is really whether you can remember anything
 2 and help me beyond the correspondence, but you can't?
 3 A. I'd have to see the correspondence. I mean, this is
 4 nearly ten years ago and there was a lot of
 5 correspondence.
 6 Q. Can we go to {TMO00831285/4}, please. You can see that
 7 this is an email which says — and this is within the
 8 chain we're looking at. It's from Joanne Burke to you
 9 of 11 November:
 10 "Dear Peter
 11 "Our stage three process involves a review by
 12 a panel of people who have had no [previous] involvement
 13 with the complaint; this would normally be the CEO, or
 14 Director, resident Board Member and a council appointed
 15 or independent Board Member. The review should be
 16 completed within 28 working days.
 17 "However, due to the complexity of this case and
 18 possible Housing Ombudsman involvement, it is my view
 19 that we seek an independent review. Our policy states
 20 we can offer this at any stage of the process.
 21 "What are your thoughts?"
 22 Your response to this is just above that, if we
 23 scroll up, please, higher up page 4:
 24 "Joanne
 25 "I don't think that this case is particularly

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1 complicated. There are actually very few tangible
 2 issues raised in the correspondence.
 3 "I think it would be very helpful to have a Stage 3
 4 Panel that comprising a KCTMO Director, a rep from RBKC
 5 (Amanda Johnson?) and an Independent Board Member."
 6 Why were you, as it appears from this, reluctant to
 7 have an independent review at this stage as opposed to
 8 a stage 3 panel?
 9 A. I don't remember.
 10 Q. I mean, some of GTLA's concerns were long-standing and
 11 related to a number of different areas relating to TMO's
 12 management of Grenfell Tower. Do you accept that it
 13 could have been helpful to have had an independent view,
 14 an independent voice, on the management issues raised by
 15 the GTLA at that stage?
 16 A. Erm ... I mean, the bit of the — I mean, I don't
 17 remember the detail — the specifics of the
 18 correspondence. The bit you showed me was specifically
 19 regarding the design of the building, and that was
 20 something that actually I felt that the GTLA were
 21 concerned of lack of progress and felt that the
 22 consultation that we were carrying out as part of the
 23 design of the building was, I think in their words,
 24 time-wasting rather than ... we should be just getting
 25 on and doing the work, which was really the thrust of

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1 their concerns.
 2 Q. Well, I showed you the bit about the refurbishment, that
 3 it wasn't only about progress but input into design, but
 4 let's go back to it. Let's go back to the list at
 5 page 6 {TMO00831285/6}, and I'll take you just through
 6 the headings. We've got the email of 6 August 2013,
 7 we've got, under item 2, the relationship between
 8 Lancaster West Estate Management Board and TMO going
 9 back to the 2009 report. Do you remember the 2009
 10 Memoli report?
 11 A. Well, no, I wasn't there in 2009 —
 12 Q. I know, but do you remember —
 13 A. No.
 14 Q. — finding out about it when you arrived?
 15 A. No.
 16 Q. Are you familiar with the 2009 report at all?
 17 A. No.
 18 Q. So when you got this document, you didn't ask anybody
 19 the question: well, what is the 2009 report?
 20 A. Well, I wouldn't have been dealing with that part of
 21 this correspondence, so the issue about the relationship
 22 between various parts of the organisation would have
 23 been dealt with either through the —
 24 Q. Right.
 25 A. — resident engagement team or through the company

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1 secretary in terms of the governance arrangements, but
 2 I would have no direct — so in a way, some of these
 3 complaints or some of these communications from the GTLA
 4 were quite broad, some of the issues were quite old —
 5 Q. Yes.
 6 A. — and so, you know — and I think that was an issue as
 7 well. So it was referring to some issues that had
 8 occurred maybe ten years ago, which have either been
 9 addressed previously through the complaints procedure or
 10 were timed out in accordance with the policy.
 11 Q. Well, since you ask, let's keep going with the list.
 12 Bottom of page 6, heating and hot water system. Item 4
 13 {TMO00831285/7} is refurbishment of Grenfell Tower, we
 14 looked at. Item 5 {TMO00831285/8} was the 30 April 2010
 15 fire which broke out at Grenfell Tower in which there
 16 was a problem. 6 is cleaning. 8 was the power surges
 17 {TMO00831285/9}. There doesn't seem to be a 7, although
 18 I think it's estate garden management. 8 was power
 19 surge in May 2013, and you will remember that and a lot
 20 about that.
 21 A. Yes.
 22 Q. So these issues are numerous, widespread and historic.
 23 My question again: do you accept, sitting here
 24 today, that it would have been helpful to have had an
 25 independent view on the management issues raised in this

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1 email?
 2 A. I didn't have a view. I felt that an independent view
 3 was going to be gained through the route that
 4 I proposed. I hadn't — and it was for the complaints
 5 team to recommend what would be an appropriate route to
 6 best resolve these issues.
 7 Q. Going back to page 2 {TMO00831285/2}, your email to
 8 Janet Seward, 14 November, I showed you this a minute
 9 ago. Let's look at the third paragraph in this which
 10 I didn't show you but I will now. You say:
 11 "When you have had a chance to review this, would
 12 you like to let us know how you would like to take this
 13 forward? For instance, would you like Daniel and I to
 14 draft responses to the relevant parts of Mr Awoderu's
 15 latest email?"
 16 What were the relevant parts of Mr Awoderu's email?
 17 A. So Daniel is Daniel Wood, who is the head of home
 18 ownership, so a significant number of the issues that
 19 were being raised by Mr Awoderu were related to service
 20 charges and the service that he was being charged for
 21 through his service charge. So some of these issues
 22 were going to be dealt with through my team, so
 23 for example the Grenfell refurbishment project and the
 24 power surges, they were issues that my team had dealt
 25 with. All of the others were dealt with — were

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1 primarily raised — were relating to the service for
 2 which Daniel Wood as head of home ownership was
 3 responsible for. So really what I was trying to do was
 4 ask the person who had the overview of the complaints
 5 procedure to give some direction as to how they wanted
 6 to co-ordinate those bits, because it wasn't one person
 7 or one service that was responsible here.
 8 Q. Janet Seward was in the complaints team?
 9 A. She was the senior manager in the team, so the
 10 complaints team — the head of complaints, Joanne Burke,
 11 reported to Janet Seward.
 12 Q. Now, you're offering to draft responses to the relevant
 13 parts. Did you expect to provide draft responses even
 14 before the stage 3 panel had convened?
 15 A. Erm ... I don't know that it was responses to Mr Awoderu
 16 or reports on the relevant bits. That's what I'm asking
 17 Janet, is how does she want to co-ordinate this, because
 18 this was quite a multifaceted and complex piece of
 19 correspondence.
 20 Q. Well, you're not offering to set out your view in
 21 relation to a stage 3 independent panel investigation;
 22 you're offering to draft responses to the relevant parts
 23 of Mr Awoderu's latest email.
 24 My question again: did you intend to provide the
 25 draft responses to Mr Awoderu's complaints even before

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1 the stage 3 panel had convened?
 2 A. No.
 3 Q. So what are you offering then when you say, "would you
 4 like Daniel and I to draft responses to the relevant
 5 parts of Mr Awoderu's latest email?"
 6 A. I think drafting responses doesn't mean replying to the
 7 actual complaint, it means pulling together briefing
 8 packs and information that the panel could consider,
 9 I assume.
 10 Q. Well, it doesn't read that way, does it?
 11 A. Sometimes emails are written in very short notice
 12 that — on the hoof, and I think ...
 13 Q. Right.
 14 Can we take it that you would have expected the
 15 stage 3 panel to agree with what you put in your
 16 response to the complaint?
 17 A. No.
 18 Q. Was the fact that you wanted to or were offering to
 19 draft responses to Mr Awoderu's email or at least the
 20 relevant parts of it the reason why or a reason why you
 21 preferred not to hold an independent review?
 22 A. Holding the independent review wasn't my call, it was
 23 the view — that was the call of the complaints team.
 24 Q. You weren't supporting it, though, were you? It had
 25 been suggested but you didn't embrace it.

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1 A. If they'd decided that that was the most appropriate way
 2 of dealing with it, then I would have embraced it.
 3 Q. Then we continue up this email chain, please, to the
 4 foot of page 1 {TMO00831285/1}. We can't see a reply
 5 from Janet Seward to you, but if we go to the foot of
 6 page 1, and over to page 2, we can see a further email
 7 from you on 27 November 2013 to Janet Seward, copied to,
 8 among other people, Sacha Jevans:
 9 "Dear Janet
 10 "Following our catch up last week, I am resending
 11 Mr Awoderu's original correspondence relating to his
 12 Stage 3 Complaint.
 13 "As we discussed, it would be sensible to have
 14 Amanda Johnson involved in the Panel.
 15 "We also agreed that you would prepare a report
 16 detailing the outcome of your review of the case and
 17 giving a summary of the key issues that the Panel may
 18 want to consider when making their decision.
 19 "Has a date been set for the Review Hearing?
 20 "Can we have sight of the report that you will send
 21 to accompany the pack? I think that Yvonne and/or Sacha
 22 should have a chance to review this before it is
 23 issued."
 24 Had you discussed with Janet Seward your intention
 25 to provide a response to the panel?

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1 A. I don't ... where does it say that I was doing that?
 2 Sorry.
 3 (Pause)
 4 Q. Well, looking at the second paragraph:
 5 "We also agreed that you would prepare a report
 6 detailing the outcome of your review of the case and
 7 giving a summary of the key issues that the Panel may
 8 want to consider when making their decision."
 9 A. So that's Janet Seward, not me, that's producing that
 10 report.
 11 Q. Yes. Had you discussed with Janet Seward your
 12 intention, certainly as encompassed or implied by your
 13 question there, that the panel should have a response?
 14 A. No.
 15 Q. So what was the subject of the agreement then?
 16 A. A briefing — I mean, I'm assuming that what was agreed
 17 is that Janet would prepare a report detailing the
 18 outcome of the review of the case. She would produce
 19 a written report with the evidence that could be
 20 reviewed by the stage 3 panel, I assume.
 21 Q. Right. You asked for sight of the report; why did you
 22 want to see that?
 23 A. Just to ensure it was correct and we had everything in
 24 there that was relevant.
 25 Q. I see. And why did you expect Yvonne and Sacha to have

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1 a chance to review it?

2 A. For the same reason: to make sure that it was complete.

3 Q. Right. What would Sacha Jevans know about the report

4 that she could add to or subtract from or comment on?

5 A. I don't know, I can't remember who had dealt with the

6 stage 1 and the stage 2 issues here. Without seeing the

7 detail of that, I can't really remember.

8 Q. Right. Maybe we'll come back to that question later.

9 Did you want to control the information that was put

10 before the stage 3 panel?

11 A. Only to the extent that it was important that all the

12 correct information was there.

13 Q. When you say the correct information, do you mean

14 factually correct or correct from the point of view of

15 what it was that you wanted them to see?

16 A. Factually correct.

17 Q. I see. So is this right: you just wanted to make sure

18 that any statements of fact that were in that report

19 were complete and accurate?

20 A. That they had all of the information on which they could

21 base a judgement, and they were reviewing the

22 information that had been provided.

23 Q. Right.

24 At all events, do you accept that you had or were at

25 least looking to have input into all three stages of the

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1 complaints process for this complaint?

2 A. Well, I haven't seen stage 1 or stage 2, so I can't

3 really comment on what involvement I had at either of

4 those stages, and at stage 3, all I'm trying to ensure

5 is that the panel get all of the information. So that's

6 not having input, it's making sure that they have the

7 information on which they can consider their decision.

8 Q. I'm not sure I follow.

9 If you had not had input into stage 1 and stage 2,

10 how would you be able to know whether the report

11 detailing the outcome of the review so far was accurate?

12 A. Sorry, I don't follow the question, but —

13 Q. The question is —

14 A. Your question was: do I accept that I was involved at

15 stage 1, 2 and 3? I haven't seen who's written what at

16 stage 1 and stage 2 —

17 Q. No, Mr Maddison, because I haven't spent the time going

18 through all of that with you because otherwise we'd be

19 here until Thursday next week.

20 A. Okay. In which case, I'm sorry, I can't answer the

21 question.

22 Q. You can. I'm just trying to short-circuit it. You can

23 help me.

24 Do you accept that, had you not been involved in

25 stage 1 or stage 2, you wouldn't have needed to and

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1 in fact would not have been able to provide any input

2 into the report thus far to make sure that it was

3 complete and accurate?

4 A. I'm sorry, I don't really follow there. What I — all

5 I was trying to do here is to ensure that we had the

6 right information so that people could make the correct

7 review and make sure that we got the right decision

8 for — to that complaint, and that right decision is

9 either it's upheld and we agree a set of actions, or

10 it's not upheld and we agree why, and it's about giving

11 clarity in this process.

12 So, as part of that, yes, I would see my role as

13 ensuring that I get as much of the information so that

14 that independent panel can review that process.

15 Q. Well, if you hadn't been involved in the stage 1 or

16 stage 2 process, what input would you be able to give

17 into ensuring that the report about the complaint review

18 so far was complete and accurate?

19 A. I'm assuming that I was involved because I had some

20 knowledge of some of the information that was going on

21 at this stage, and it's clear that some of the issues

22 certainly related to the power surges I'd had extensive

23 involvement with in — both in terms of engaging with

24 residents but also in terms of communicating to

25 the council and to the property scrutiny committee and

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1 our board. So I was just making sure that all of that

2 relevant information was available so that the panel

3 could consider whether the appropriate decision had been

4 made.

5 Q. It is certainly the case, from the records, that you

6 were involved in the stage 2 complaint. We can look at

7 that if we need to. Do you not recall that

8 independently?

9 A. I don't.

10 Q. Let's just quickly look then at {TMO00846643}. This is

11 your letter. Let me make that good. If you turn to

12 page 2, your name is at the bottom, "Yours sincerely,

13 Peter Maddison".

14 If we go to page 1, we can see that this is a letter

15 of 14 October 2013 to Mr Awoderu, vice chairman of GTLA:

16 Dear Mr Awoderu,

17 "Stage Two Complaint.

18 "Thank you for your e-mail dated 29th September.

19 I am considering your complaint to be considered at

20 Stage Two of the KCTMO Complaints Procedure."

21 Then you set out your response to it.

22 So without going into the details, we can see that

23 you were involved in stage 2; yes?

24 A. Yeah.

25 Q. Yes, and then if we look at the penultimate paragraph on

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1 that page, you say:
 2 "You have not specified issues that you feel that
 3 have not been properly addressed in the Stage One
 4 response. I have reviewed the Stage One response and,
 5 given the evidence provided to date, I would confirm
 6 that I agree with Joanne Burke's decision not to uphold
 7 your complaint."
 8 So it looks as if, from this, Joanne Burke had dealt
 9 with the complaint at stage 1, you had dealt with it at
 10 stage 2, and were now looking to have input into
 11 stage 3.
 12 A. Having input is overstating my involvement. It's making
 13 sure that the panel had the information to allow them to
 14 make the decision.
 15 Q. Do you accept that you were involved in reviewing
 16 stage 1 at stage 2, and involved in some respects, as
 17 we've seen from this email chain, in stage 3?
 18 A. I would have — naturally I would have reviewed the
 19 stage 1 response at stage 2. That is part of the
 20 process, is to make sure —
 21 Q. Indeed.
 22 A. — and so I have responded to stage 2 and I was
 23 communicating with the complaints team to ensure that
 24 they had — that the panel had the correct information
 25 to allow them to review that decision.

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1 Q. Now, let's turn to a different topic. I want to ask you
 2 about a complaint now by Mr Daffarn about fire safety in
 3 2014.
 4 Can we start by looking, please, at {TMO10007353}.
 5 This is a series of emails about complaints made about
 6 access to the building in 2014.
 7 If we scroll down to the start of where I want to
 8 show you at page 7 in this email run {TMO10007353/7}, we
 9 can see here that there is an email from Ben Dewis of
 10 London Fire Brigade to Janice Wray of 8 July 2014 which
 11 he sends to her in which he says:
 12 "Dear Janice,
 13 "I received this email below from an Edward Daffarn
 14 who you may be aware of who lives at Grenfell Tower."
 15 Then within the email is set Mr Daffarn's email to
 16 Ben Dewis of the LFB.
 17 If we go up the chain — well, let's look at the
 18 topic, I should show you the topic. He says:
 19 "Dear Ben,
 20 "Please be advised that residents of Grenfell Tower
 21 are very concerned about fire safety after the recent
 22 closure of all land and 'rights of way' to the West and
 23 North of Grenfell Tower.
 24 "We are also very concerned that we have no idea
 25 where to assemble should there be a fire in

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1 Grenfell Tower as there is no open space in the vicinity
 2 that is available to our community.
 3 "Please can you help ensure that the Fire Brigade
 4 will monitor the current changes on Lancaster West
 5 Estate that impact on our fire safety and could you also
 6 inform us where we should assemble in the event of
 7 a fire?
 8 "Thank you for your assistance ..."
 9 Now, if we look up the chain, please, we can see
 10 that there is an exchange of emails between Ben Dewis
 11 and Janice Wray, particularly foot of page 5 over to
 12 page 6, just to give you the context in the string of
 13 emails, and then scrolling up to page 4, further emails
 14 between Janice Wray and Ben Dewis. Then eventually we
 15 arrive at an email on page 4 from Janice Wray,
 16 1 September, copied to Claire Williams on the same
 17 subject of fire safety.
 18 Then if we go to page 2 {TMO10007353/2}, we can see
 19 that Janice Wray writes to Claire Williams and you on
 20 4 September 2014:
 21 "Peter & Claire
 22 "As discussed I asked Ben Dewis, LFB Inspection
 23 Officer, if he would provide us with a copy of his
 24 response to Mr Daffarn or at least a summary of his
 25 response. Please see me[sic] e-mail and his response

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1 below. Do you need me to go back to him?"
 2 Your response is on page 1 {TMO10007353/1}. I'm
 3 sorry about the long run-up to that but I wanted to make
 4 sure you had the full context.
 5 You say this to Janice Wray and Claire Williams:
 6 "As we discussed briefly, I think Mr Daffarn's blog
 7 is scaremongering and could be quite frightening to
 8 residents.
 9 "I think we need to send out a very clear message to
 10 residents in a letter or newsletter about the current
 11 safety of the block and how we will maintain this over
 12 the duration of the works.
 13 "It would be good to be able to put out a clear
 14 statement with the support of the Fire Brigade.
 15 "However, before we do so, I think we need to do
 16 a further belt and braces check on Fire Safety
 17 compliance in the block and [stitch] the Fire Brigade
 18 into this.
 19 "Can you please lead on this, and bring in members
 20 of A&R as necessary?"
 21 Were you a regular reader of the Grenfell Action
 22 Group blog?
 23 A. No, I was aware of it generally. When I first joined
 24 the TMO, Mr O'Connor would send emails with his latest
 25 blog attached, but that stopped after about a few months

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1 as I think Mr O'Connor left the country.
 2 Q. Do you remember a policy decision being made by the TMO
 3 to block staff access to the blog?
 4 A. I was aware of that and ... but Councillor Blakeman
 5 would sometimes forward me an email saying, "This is
 6 Mr Daffarn's latest blog" and ask for comment, and
 7 I would ... so I did ask the head of IT to remove the
 8 block because I felt it was unhelpful, because if there
 9 was an issue being raised — and I did correspond with
 10 Mr Daffarn and explain that we weren't monitoring the
 11 blog, and I know Robert Black wrote to Mr Daffarn as
 12 well to explain that we didn't monitor and respond to
 13 blogs and round-robin emails. I think the — it was
 14 quite a — the blog itself wasn't an engagement process,
 15 there was no way of contacting the person who was
 16 writing the blog, and in fact the blog was anonymous.
 17 It's just we assumed it was Mr Daffarn, but it wasn't —
 18 there wasn't any means of contacting him, and Mr Daffarn
 19 was contacting the TMO on a regular basis if he had
 20 specific issues to raise.
 21 Q. Do you remember when access to the blog was blocked by
 22 the TMO?
 23 A. No, I don't.
 24 Q. We can see here that your view was that Mr Daffarn's
 25 blog was scaremongering; why did you think that?

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1 A. It was raising issues of fire safety that I had
 2 understood were in hand, so it was — the blog itself
 3 that you showed me — well, you haven't showed me the
 4 blog, you've made the reference in the email to
 5 Ben Dewis — was about access across the green space
 6 around the block, and having recently read the blog, it
 7 was about changes in access arrangements within the
 8 building, which we had had checked by the Fire Brigade,
 9 amongst others, to ensure that it was safe and
 10 appropriate.
 11 So my concern was by raising a concern saying that
 12 it wasn't safe could be quite a frightening message to
 13 residents, and I felt that we needed to get a clear
 14 message out to residents about what we were actively
 15 doing to make sure that the block was safe. But before
 16 we were doing that, I suggested to Janice that we should
 17 do some further belt and braces checks just to make sure
 18 that everything is in order.
 19 Q. You say in your last answer you checked access
 20 arrangements with the Fire Brigade to ensure it was safe
 21 and appropriate. Are you saying that you investigated
 22 the fire safety concerns raised by Mr Daffarn in his
 23 email to Mr Dewis?
 24 A. I didn't deal with this as part of a complaint. This
 25 wasn't dealt with as part of a complaint. It was

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1 flagged up as — I assume somebody has given me
 2 a heads-up that there was this blog, and I've asked my
 3 team to check whether there's any issues being raised
 4 here that we need to be aware of and look at how we get
 5 communication out to all residents in the block to
 6 reassure them of what action we've taken and what should
 7 happen.
 8 Q. Well, did you investigate any of the fire safety
 9 concerns raised by Ed Daffarn in his email to Ben Dewis?
 10 A. I don't — I wasn't party to that correspondence.
 11 Q. Well, you were, you see.
 12 A. The Ben Dewis —
 13 Q. I've just shown you. You got roped into it or looped
 14 into it —
 15 A. Okay, so I'm ... right. I don't ...
 16 Q. I'll ask my question again.
 17 Having seen these emails, as of or after
 18 4 September 2014, did you or anybody under your
 19 direction investigate any of the fire safety concerns
 20 raised by Mr Daffarn?
 21 A. Yes, so my correspondence here was for Janice to carry
 22 out further investigations. Her response to this
 23 I understand was "Will do", and they were ... but in
 24 my ... there was a regular liaison between Janice and
 25 Claire and the Fire Brigade in relation to issues across

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1 the borough, but specifically with Grenfell.
 2 Q. So —
 3 A. But there was also correspondence with — there was
 4 regular engagement with the Fire Brigade, who would
 5 attend site on a regular basis to meet with Rydens to
 6 discuss issues that were emerging throughout the
 7 refurbishment works. So I knew there was a good liaison
 8 between the Fire Brigade and the team on site, and I was
 9 asking Janice and Claire to check that everything was in
 10 order before sending out a message to residents
 11 regarding how they should act in the event of a fire.
 12 Q. Just so we're clear, when you say in the last but one
 13 paragraph, "we need to do a further belt and braces
 14 check on Fire Safety compliance in the block and
 15 [stitch] the Fire Brigade into this", were you saying
 16 that Janice Wray should investigate Mr Daffarn's
 17 concerns and ensure that his concerns were met?
 18 A. Yes.
 19 Q. Did that happen?
 20 A. Janice responded to me that she would do, and I — and
 21 that was — and there was a dialogue going on from this
 22 whereby which we did send out further fire safety
 23 information to residents in a future newsletter, I seem
 24 to remember.
 25 Q. There was, I'm just going to show you those. My

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1 question: did that happen? Was there in fact a further
 2 belt and braces check on fire safety compliance in the
 3 block with the Fire Brigade stitched into it?
 4 A. My understand — I don't know whether the Fire Brigade
 5 were stitched into it, but actually the Fire Brigade
 6 were engaged with Janice and Claire on a bi-monthly
 7 basis, and also there were regular independent visits of
 8 the Fire Brigade to meet with Rydons on site to consider
 9 any issues that were arising over the evolution of the
 10 works.
 11 Q. Did you yourself follow up to make sure that the belt
 12 and braces check that you had asked for was carried out
 13 fully to your satisfaction?
 14 A. I don't recall specifically how I did that, but there
 15 was a regular liaison between myself and the project
 16 team, Janice and the contractor.
 17 Q. Yes, there was, but my question once more: do you
 18 remember actually following up and satisfying yourself
 19 that the belt and braces check that you had asked for
 20 was in fact carried out?
 21 A. I didn't double check.
 22 Q. Right. Why is that?
 23 A. I think that — well, I didn't specifically double check
 24 in terms of an action, but obviously I had an ongoing
 25 dialogue with those teams and from that I would have got

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1 comfort that those issues had been reviewed.
 2 Q. We've identified two Grenfell Tower regeneration
 3 newsletters — you refer to newsletters — which refer
 4 to fire safety advice. The first one is July 2014,
 5 which pre-dates this exchange and pre-dates your request
 6 for a belt and braces check. The second one is dated
 7 May 2016, which is, I'll just show it to you,
 8 {JRP00000028}. There is the date. The fire safety
 9 advice is on page 4 {JRP00000028/4}, which is about the
 10 stay-put policy. It's not about Fire Brigade access.
 11 Do you know why a letter or newsletter or indeed any
 12 information about the fire safety of the block was not
 13 sent to residents after the email exchange we've seen in
 14 July to September 2014?
 15 A. I don't know whether any separate information was sent
 16 through Janice after that meeting.
 17 Q. Have you seen any?
 18 A. I haven't seen any, no, but I don't know what other
 19 correspondence has gone on in relation to that.
 20 Q. Right.
 21 Now, I'm going to turn to a different topic, which
 22 I'm unlikely to finish before the break, but I'm going
 23 to start it, Mr Chairman, if I can, and that's the 2015
 24 complaint about the AOV system.
 25 I'm going to ask you to start, please, by looking at

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1 your first statement at page 15 {TMO00000892/15}, and
 2 it's paragraph 82. You set out in that paragraph at
 3 some length your understanding of the AOV system for the
 4 refurbishment. At the end of it you say this in the
 5 last sentence:
 6 "All I can say is that it was a system that was
 7 designed and checked by Max Fordham to be compliant with
 8 current regulations and it was still under warranty with
 9 Rydon at the time of the fire."
 10 To what extent were you involved with the other
 11 contractors working on the smoke control system?
 12 A. Sorry, which other contractors?
 13 Q. Well, for example, PSB.
 14 A. No, not —
 15 Q. Have you heard of PSB?
 16 A. No.
 17 Q. Were you aware that it was PSB who had designed the
 18 system as installed rather than Max Fordham? Did you
 19 not know that?
 20 A. No.
 21 Q. Right.
 22 Were you kept updated about the progress of
 23 replacement of the AOV?
 24 A. In broad terms as part of the overall programme, yes.
 25 Q. Right.

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1 Let's go to {TMO10008416}, please.
 2 A. Just on the subject of the design of it, Max Fordham
 3 were actually retained by the TMO to give advice on the
 4 technical aspects of the installation of the AOV under
 5 the design and build contract with Rydons, so
 6 Max Fordham had a role in ensuring that the AOV
 7 complied.
 8 Q. Yes.
 9 Can we please go to this email, which is
 10 5 January 2015 from you to Amanda Johnson at RBKC, and
 11 I'll just explain, it relates to a complaint raised by
 12 the Grenfell Tower Leaseholders' Association through
 13 Tunde Awoderu, who was still the vice chair at that
 14 time, regarding, among other things, the progress of the
 15 work on the smoke extraction system. So that's the
 16 topic.
 17 If we look at the foot of the email thread at page 4
 18 {TMO10008416/4}, we can see — and I'm so sorry, again
 19 it starts at the bottom of page 3, from the
 20 Grenfell Tower Leaseholders' Association to
 21 Councillor Dent Coad and Judith Blakeman, Friday,
 22 2 January 2015, with a long list of copyees on it,
 23 including you, I think.
 24 If you go to page 4, you can see that there is
 25 a subject line:

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1 "Improvement work on existing smoke extraction and
2 ventilation , system which links to the fire alarm, under
3 the Grenfell Regeneration Project."
4 If we pick it up on page 4, four paragraphs up from
5 the bottom, so about halfway down, it says:
6 "Rydon has been on site ..."
7 Can you see that?
8 A. Yes.
9 Q. Thank you:
10 "Rydon has been on site since June 2014 and so far
11 there is no tangible evidence whatsoever Rydon and KCTMO
12 intend to carry out replacement of the smoke vent and
13 extraction and ventilation system which links to the
14 fire alarm. We need confirmation that Rydon will carry
15 out the work as part of the regeneration project as
16 promised by the KCTMO."
17 Then they copy in the next paragraph the fire risk
18 assessment of 20 November 2012.
19 Now, we know that you saw this because if you go up
20 to page 1 {TMO10008416/1}, you are at the top of the
21 email string and say in the second paragraph:
22 "Mr Awoderu's correspondence is addressed to
23 Cllr Dent Coad and Cllr Blakeman ..."
24 It has been forwarded to you for help in responding.
25 "I therefore suggest we treat this as a Member's

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1 Enquiry at this stage."
2 So that's the member's enquiry route as opposed to
3 the complaints procedure route; yes?
4 A. Yes.
5 Q. Yes.
6 Now, you then go on to say:
7 "I intend to draft a brief response to Cllr Blakeman
8 explaining the following ... "
9 Then there is a long list of matters underneath that
10 going over on to page 2.
11 Just in general, is it right that your email
12 response here at the top of this thread was effectively
13 discussing how the TMO should respond to this enquiry?
14 A. I think Mr Awoderu's email was sent to a very wide
15 audience and I was trying to establish which route —
16 what was the appropriate route to respond.
17 Q. Yes. Would the TMO's response to this email have been
18 any different if it had been treated as a complaint and
19 sent through the complaints procedure as opposed to
20 being treated as a member's enquiry?
21 A. I don't think so, no.
22 Q. Right.
23 A. Save the fact that a complaint would be responding
24 directly to Mr Awoderu, whereas a member's enquiry would
25 be responding directly to the councillor.

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1 Q. Yes, I see.
2 Did you tell the GTLA that their complaint would be
3 considered as a member's enquiry and treated through
4 that route as opposed to the complaints procedure route?
5 A. I don't remember what was ultimately written.
6 Q. Now let's go back up to page 1, and go down to page 2,
7 scroll down through page 1, where you're setting out
8 some of the intended response.
9 On page 2 {TMO10008416/2}, picking it up at the top
10 of the screen, you say:
11 "The scope of work to Grenfell includes the
12 upgrade/renewal of Smoke & fire safety and ventilation
13 system.
14 "The system is currently beyond economic repair. We
15 are working with Building Control to agree a design for
16 the system that will meet current standards.
17 "We have been in close contact with the Fire Brigade
18 to make them aware of the current situation, so they can
19 take this into account in their approach to any fire
20 safety issues.
21 "Our contractors (Rydon) have also been in liaison
22 with the Fire Brigade to agree safe working methods in
23 the interim while the system is being worked on.
24 "We have posted notices throughout the building and
25 explained in newsletters that a 'stay put' policy is in

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1 place in the event of a fire."
2 Now, just going up to the second paragraph there,
3 where you say, "The system is currently beyond economic
4 repair", what did you mean by that?
5 A. I think it couldn't be relied on to work at any
6 particular time. It was — it could be, you know ...
7 so, yeah, it needed replacement.
8 Q. Yes. Was it working at all?
9 A. At this particular time, I don't recall. But there were
10 certainly times when it was working, but at no point in
11 the time that I was there was it reliably working. It
12 needed to be replaced.
13 Q. When you said it was beyond economic repair, did you
14 mean to indicate that it was technically capable of
15 repair but the cost of doing so was prohibitive?
16 A. No, I meant it really wasn't working.
17 Q. Really wasn't working.
18 A. It needed to be replaced is what I was trying to
19 communicate.
20 Q. Right.
21 When you said that, what was your information based
22 on? What was your statement there based on?
23 A. I'd had various reports from the contracts management
24 team within my team who had been trying to maintain it
25 through the existing term contracts, I'd had feedback

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1 from the contractors who were working for Rydons in
 2 this, and also I'd — there had been various
 3 communications that I'd understood between Janice Wray
 4 and Claire and the Fire Brigade in relation to this
 5 matter.
 6 Q. Do you know for how long the AOV system had been beyond
 7 economic repair?
 8 A. I don't precisely, no.
 9 Q. Did you investigate?
 10 A. No. Well, my assumption at this time was that the
 11 system wasn't working and the priority was to get the
 12 new system in place.
 13 Q. Did you at this time or around this time see the draft
 14 existing fire safety strategy which had been done by
 15 Exova in respect of Grenfell Tower in August 2012?
 16 A. No.
 17 Q. Did you know of its existence?
 18 A. No. That was before my time.
 19 Q. To your knowledge, had anyone at the TMO actually told
 20 the LFB precisely what the state of the AOV system was
 21 in the way that you've just described it to us?
 22 A. The way I described it is the way that I'd understood
 23 it, is that there had been clear communication with the
 24 LFB about its current condition. The Fire Brigade had
 25 visited site on a regular basis as part of

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1 familiarisation visits, but also as part of the liaison
 2 with Rydons over the duration of the works. So I'd be
 3 really surprised if it wasn't clear throughout all that
 4 correspond — that communication that they weren't clear
 5 that there was a significant problem with that.
 6 Q. Right.
 7 A. And I'd also had feedback through — I can't remember
 8 exactly who it was from now, who explained that they
 9 were aware of the situation and would take breathing
 10 apparatus if there were an issue. That was my
 11 understanding, is that they had a way of working around
 12 the issue.
 13 Q. What was the basis of your understanding that the LFB
 14 were fully aware of the precise condition of the AOV?
 15 A. As I've just described, there'd been extensive
 16 communication with the Fire Brigade on various levels
 17 within various teams, including the health and safety
 18 team and the project manager for the project, but also
 19 independently with Rydons and the LFB. So my
 20 understanding was that there had been clear
 21 communication on —
 22 Q. Yes, I'm asking you for the source of your
 23 understanding. Was it a person or a letter? Did
 24 somebody say to you, "The LFB have been told it's not
 25 working"?

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1 A. It's stated in a number of meetings, the minutes that
 2 I've seen, that the LFB are aware. That's — that was
 3 clearly my understanding at that time.
 4 MR MILLETT: Right.
 5 Mr Chairman, it's a couple of minutes past 1.00,
 6 I apologise for going over a little bit, but we are
 7 still on this topic and this email chain, but this is
 8 probably the moment for the lunch break.
 9 SIR MARTIN MOORE-BICK: Right, thank you very much,
 10 Mr Millett.
 11 There we are, Mr Maddison, we will break now to have
 12 some lunch. We will resume at 2 o'clock, please. No
 13 talking to anyone about your evidence while you're out
 14 of the room.
 15 THE WITNESS: Thank you.
 16 (Pause)
 17 SIR MARTIN MOORE-BICK: Good. Thank you. 2 o'clock,
 18 please.
 19 (1.03 pm)
 20 (The short adjournment)
 21 (2.00 pm)
 22 SIR MARTIN MOORE-BICK: All right, Mr Maddison, are you
 23 ready to carry on?
 24 THE WITNESS: Yes, thank you.
 25 SIR MARTIN MOORE-BICK: Thank you very much.

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1 Yes, Mr Millett.
 2 MR MILLETT: Yes, thank you, Mr Chairman.
 3 Mr Maddison, we were on the subject of the AOVs and
 4 I was in the middle of an email chain. I think we may
 5 be able to take this a little bit more quickly.
 6 Just in general terms, given what you told us
 7 earlier about your knowledge of the state of the AOV in
 8 September 2014, did you at that stage consider what
 9 interim measures should be put in place for
 10 Grenfell Tower, pending the full replacement of the AOV
 11 system?
 12 A. The dialogue I had seen with the Fire Brigade was that
 13 they'd recommended some working practices for Rydons to
 14 follow, and taking care in their working practices at
 15 the beginning and the end of the day.
 16 Q. Yes.
 17 A. And I'd also understood that the Fire Brigade had —
 18 would have used the smoke systems in the event of
 19 a fire — breathing apparatus, rather.
 20 Q. Right. That's Rydon and the LFB. What about the
 21 residents? Did you consider what interim measures were
 22 needed to be put in place pending the replacement of the
 23 AOV system that would protect the residents?
 24 A. My assumption was that the advice to the residents would
 25 stay the same and there would still be a stay—put

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1 policy. So there was no specific change in the advice
 2 necessary as a result of that, I assumed.
 3 Q. But the purpose of the AOV was to keep the escape route
 4 clear of smoke, wasn't it?
 5 A. Yes.
 6 Q. But if the AOV wasn't working, what interim measures did
 7 you consider, if any, to be put in place to keep the
 8 escape route clear of smoke?
 9 A. When you say the escape route, it was for the corridors.
 10 Q. Well, the communal areas and the stairwell.
 11 A. Yeah, the communal areas, not the stair — did it impact
 12 the stair? I thought the stair was a separate
 13 compartment.
 14 Q. All right, so taking the communal areas to start with,
 15 then. What interim measures did you consider needed to
 16 be put in place, if any, pending the —
 17 A. I personally didn't look at that. I was taking — would
 18 have taken the advice of the experts in that —
 19 Q. I see.
 20 Did you consider telling all residents of
 21 Grenfell Tower that the AOV could not be guaranteed to
 22 work in the event of an emergency, in the event of
 23 a fire?
 24 A. Not specifically, no. I did tell a number of residents
 25 who had asked specifically that question, but not

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1 a general advice, because my understanding was the
 2 advice would have still been the same, and stay put, and
 3 that the LFB had different approaches that they would
 4 take in the event of a fire, and that Rydons had taken
 5 into account the advice of the LFB in terms of their
 6 working practices.
 7 Q. Now, just to pin you down a bit, if I may, you say you
 8 did tell a number of residents who had asked that
 9 question; who were they?
 10 A. I've seen the correspondence — you know, it's all on
 11 the record, correspondence with Mr Daffarn, Mr Awoderu,
 12 possibly Mr Collins, I think, as well.
 13 Q. I think it is right that there was in the end a response
 14 to the GTLA, because they had asked the question, but do
 15 I take it from that that there was not a full response
 16 to all residents in the building by way of a circular
 17 letter or something of that nature telling them that the
 18 AOV system was not working?
 19 A. I'm not aware of there being one. I mean, it may — if
 20 there was one, it would have probably been between
 21 Janice Wray and Claire Williams.
 22 Q. We haven't been able to find one. Can you explain why
 23 there wasn't one?
 24 A. As I say, I would have been following the advice of the
 25 experts in this field.

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1 Q. Were you advised not to tell the residents that there
 2 was no AOV system working?
 3 A. No, certainly not. I mean, as I say, my assumption was
 4 that the advice that they've received, which was this is
 5 stay—put policy, would still apply in the event the AOV
 6 wasn't working.
 7 Q. Right.
 8 I'm curious, how would the continued application of
 9 the stay—put policy be an appropriate interim measure in
 10 respect of an AOV system which was designed to keep at
 11 least some part of the escape route clear?
 12 A. My understanding was that the Fire Brigade — the advice
 13 was the residents should contact the Fire Brigade and
 14 the Fire Brigade — so residents stay put and that the
 15 Fire Brigade would use breathing apparatus to help ...
 16 but I had no direct involvement in this. That was just
 17 my understanding based on the information that I've
 18 seen.
 19 Q. Did you ask yourself the question at the time: I wonder
 20 how somebody who does need to evacuate their flat
 21 because there is a fire in their flat will get through
 22 the communal area in the absence of an operating AOV
 23 system?
 24 A. I didn't specifically think that. As I say, the
 25 people — that wasn't my direct area of responsibility.

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1 I'd be looking for the advice of the health and safety
 2 team and the fire risk assessor and the Fire Brigade in
 3 these —
 4 Q. You say you would be looking for the advice; did you
 5 actually ask either your health and safety team or your
 6 fire risk assessor or the Fire Brigade the question I've
 7 just asked you?
 8 A. Which was about —
 9 Q. How do people who need to escape from — well, how do
 10 people breathe in the communal areas if it's full of
 11 smoke if they're escaping from their flats?
 12 A. I didn't specifically ask that question, no.
 13 Q. Now, can I then turn to the topic of emergency lighting
 14 in 2016.
 15 You, I think, have dealt in your first statement
 16 with a complaint about this topic in February 2016, and
 17 I think I can shorten it by taking you to your first
 18 statement, please, at paragraph 105 on page 20
 19 {TMO00000892/20}. There are underlying documents, but
 20 it will be quicker, I think, just to show you your
 21 statement. You say here:
 22 "There had previously been emergency lights on every
 23 other floor in the stair well but following a report
 24 from a resident Mr Collins that they were faulty, we
 25 arranged for all lights in the stairwell and lobbies to

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be replaced and we took this opportunity to fit new emergency lights to every floor in the stairwell instead of every other floor. The new lights were installed — by Allied Protection I believe — at the time of the refurbishment works. This was in 2016 and all lights were therefore relatively new at the time of the fire."

That's what you say there.

Can we look next at {TMO00840545}. If we look at the first page, you will see that these are the minutes of a health and safety committee meeting dated 12 April 2016 at which you are present, as you can see from the list of names.

Can we turn, please, to page 5 in this minute {TMO00840545/5}. We can see under part 6 or section 6 of it that at 6.5 you raise a query, and the minute says this:

"PM queried how we put the fire strategy into practice. He gave an example of emergency lighting at Grenfell Tower which had been taken down by contractors but not reinstated and this was not picked up for several days despite a number of staff and contracted agents being on site in the interim. He emphasised the need for comprehensive training for all staff who visit site. BM acknowledged the need for a health and safety training programme — not confined to fire safety — to be

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implemented."

Now, is this right: this was the first health and safety committee meeting after David Collins' complaint at the end of January 2016 about emergency lighting that we have been able to see; are you referring here to the same incident with the emergency lighting here?

A. I think so, yes.

Q. Now, in this meeting you note, as we've seen, that there were staff and contractors on site who had been there but not picked up this problem. Was that because there was a broader problem with the maintenance of fire safety systems by TMO staff?

A. From memory, the emergency lighting in Grenfell Tower at that stage, the original — well, the — at that stage, before it was renewed, every other light fitting was an emergency light, so — and you could tell it was an emergency light because it had a little green or red light on it to indicate that it was charging, and Mr Collins very cleverly spotted that those lights weren't on, so the emergency lights weren't charging, so there was an issue. From memory, I think that's what the issue was. So my concern here was that other people who were doing regular inspections hadn't picked that issue up. So —

Q. Yes.

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A. — I was questioning why, and, you know, making sure that people were alert to the issues that were there.

Q. Indeed, and that provoked a reaction from you by way of emphasis of the need for comprehensive training for all staff who visit the site.

My question is whether that statement by you there as recorded illustrated a deeper problem with the implementation of the fire safety strategy not only at Grenfell but throughout the TMO stock?

A. I can't really comment on that, but I think that it's — what I was keen to do is ensure that there was a culture of people taking responsibility for things and that Barbara Matthews shared that view, and this was about having an ongoing conversation with the team and people who are on site to be aware of things that aren't necessarily the reason they're in the building or — it was just trying to build a broader awareness and responsibility within everybody in the organisation.

Q. Indeed, the reason I'm asking the question in the way I am, Mr Maddison, is because the emergency lighting was used by you as an example of a more general point you were seeking to make, which was how you put the fire strategy into practice, which is how you start this paragraph, and you end it by emphasising the need for comprehensive training for all staff who visit the site.

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My question is: were you aware or alive to the fact that the fire safety strategy wasn't properly being put into practice?

A. No, I mean, the last sentence there is saying not confined to fire safety. What I was talking about here was making sure that there was a culture in place in the organisation so that people took responsibility for all issues of health and safety, including fire safety, in the organisation.

Q. Who was responsible for introducing the health and safety training programme which was "to be implemented"?

A. That would have been the responsibility of the health and safety manager.

Q. Well, we have in the right-hand column the action identified, and "All". Did the "All" include you?

A. Erm ... well ... yeah, I'm not sure that all people at that meeting are able to put in place that action, and I — myself included.

Q. Well, you said a moment ago that it would have been the responsibility of the health and safety manager; who was that at this moment?

A. Janice Wray.

Q. That was Janice Wray, was it?

A. Janice Wray under the health and safety policy was responsible for training —

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1 Q. Do you know whether she did implement a health and
2 safety training programme not confined to fire safety
3 which would nonetheless have picked up the emergency
4 lighting example?
5 A. I don't recall.
6 Q. Right. Did you follow up on it?
7 A. I don't remember. This may have come up at the next
8 meeting, I don't know.
9 Q. Was there any improvement in the maintenance of
10 fire safety systems or health and safety systems
11 generally after you had identified the need for
12 a comprehensive training programme?
13 A. There was an ongoing discussion at this forum and at
14 other forums about raising awareness of health and
15 safety issues, ensuring people took responsibility and
16 ownership, and escalated things if things weren't being
17 done, and that was part of the dialogue that happened at
18 these meetings and that was led by Barbara Matthews.
19 Q. Right. You say there was an ongoing discussion, that
20 may be, but my question was different: was there any
21 improvement? Did it work?
22 A. It wasn't a specific thing that was measured in
23 isolation. I think it was part of the whole fire
24 management piece and the whole health and safety
25 management piece in terms of how many, you know, actions

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1 from fire risk assessments were being actioned,
2 et cetera, and how many — how quickly they were done.
3 There was a whole range of different aspects to this,
4 and this was just one conversation about how we could
5 raise awareness and hopefully improve matters.
6 Q. Well, you see, you introduced this not as a general
7 health and safety point but as a fire strategy point,
8 and you illustrate your concern about the fire strategy
9 with the emergency lighting as an example.
10 My question is: did you have any other concerns
11 about the implementation of the fire safety strategy
12 other than that illustrated by the emergency lighting
13 incident at Grenfell Tower?
14 A. I don't think so, no.
15 Q. Why did you say that it was an example? The note says
16 you gave an example of emergency lighting. If that was
17 the only one, why was it recorded as an example?
18 A. I just felt that it was always something that you could
19 do better.
20 Q. Can we turn then to the topic of floor numbering.
21 Now, I'll show you what you said at Module 1 in your
22 evidence to the Inquiry first. Can we please go to the
23 transcript for {Day59/142:4}. What I want to show you
24 here is just a bit of evidence about the process, first
25 of all.

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1 If you go to line 4 on page 142, you say:
2 "If residents weren't happy about the way that those
3 issues were addressed, they could either be escalated to
4 the TMO and through the TMO's complaints procedure or —
5 yeah, so I think that was the process that was set up.
6 So I think when you describe complaints, I think Rydon's
7 role was about being the first point of contact on
8 issues relating to the works."
9 Now, we've already looked together at how the
10 Grenfell Compact came to be recognised by the TMO, and
11 we've looked also at the August 2015 matrix that
12 Councillor Blakeman assisted the Grenfell Compact with,
13 which you will recall from this morning had a long list
14 of issues in it, 28 in all. Let me just show you that
15 again and the email by which that came to you.
16 Let's look at the email first, that's at
17 {MET00070923}. It's the second half of the screen,
18 Judith Blakeman to you, copied to other councillors,
19 28 August 2015:
20 "Dear Mr. Maddison
21 "I met with some residents of Grenfell Tower on
22 Wednesday evening, 26 August. I had prepared a matrix
23 of the issues that have been raised so far, together
24 with responses to date to simplify and clarify where we
25 currently are. I have since updated it in the light of

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1 further matters raised with me on Wednesday. I attach
2 a copy for your information.
3 "The items in bold text are the new issues that were
4 raised on Wednesday. To summarise, these are ..."
5 Then if you go over the page to page 2
6 {MET00070923/2}, you can see that there is a long list
7 of bullet points there.
8 Now, can we then go to the issues matrix which is
9 attached. That's at {MET00040986}. We looked at this
10 this morning. As you can see, it runs over some three
11 pages. If you go to page 3, you will see there are some
12 28 complaints in all, 28 points in all.
13 When you got the email on 28 August from
14 Councillor Blakeman, did you open the attachment and see
15 this document, do you remember?
16 A. I'm sure I did.
17 Q. Yes.
18 If we look at page 2 {MET00040986/2}, please, we can
19 see that item 23 reads as follows:
20 "Change floor numbers back to reflect current flat
21 numbers and find an alternative numbering system for the
22 two new floors."
23 Then response in the right-hand column, which is
24 a TMO/Rydon response:
25 "Royal Mail requires the lower floors to be

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1 numbered, so that the address is easily identifiable for
2 the emergency services in the case of any incident.
3 Floors have been re-numbered and temporary signage
4 fitted until the final version is available. The floor
5 levels have been altered and it is not possible to
6 revert to the old numbering."

7 Were these concerns recorded in the TMO complaints
8 procedure?

9 A. No.

10 Q. Why is that?

11 A. So the issues that are raised on the matrix here, some
12 of them are already resolved and some of them are easily
13 resolved. They're not all complaints. These are lines
14 of dialogue with the Compact, and so I would develop
15 that conversation with the Compact.

16 Q. I see. So some were and some weren't complaints?

17 A. I don't know that any of — I haven't read them all, but
18 the ones I've seen, some of them — so, for example,
19 change the red lights on the lift to blue as a request
20 for a service and we did it, so it wasn't necessary to
21 put it through the formal complaints procedure.

22 Install a noticeboard, it's not a complaint, it's
23 a request for action which we did.

24 Q. I see.

25 A. So I think most of the issues on here were fairly

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1 straightforward, routine-type matters that could be
2 quite simply addressed.

3 Q. Right.

4 Looking at number 23, do you remember who wrote this
5 response, "Royal Mail requires the lower floors to be
6 numbered", et cetera?

7 A. I think I probably provided the response into this
8 document for Councillor Blakeman and for the Compact,
9 and this was discussed, I presume, at the meeting of the
10 Compact.

11 Q. It says, "Floors have been re-numbered and temporary
12 signage fitted". Do you know who was responsible for
13 putting up the temporary signage?

14 A. I assume it would have been Rydons.

15 Q. Do you know or are you assuming?

16 A. It's a strong assumption.

17 Q. Right. What about the permanent signage?

18 A. So the —

19 Q. The permanent signage.

20 A. So the permanent signage would be Rydon's
21 responsibility, that would —

22 Q. Right.

23 A. So the issue here was that the original floor numbering
24 was like a hotel numbering, so flat 415 would be on the
25 fourth floor, for example, and so ... and the

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1 Royal Mail — there was a conversation here between
2 planners and the project team within — with Rydons, and
3 this alternative numbering came about as a result of
4 that recommendation, which it later transpired was
5 a little bit of a red herring.

6 Q. Was this treated as a priority, given that it was
7 relevant for the purposes of identification for the
8 emergency services in the case of an incident?

9 A. Was what, sorry, treated as a priority?

10 Q. The problem, the change in the floor numbers, and the
11 request to change them back to reflect current flat
12 numbers?

13 A. Well, these —

14 Q. Was that treated a priority, given —

15 A. No, because we didn't agree to change them back. So the
16 process that we'd been through here is we'd communicated
17 to residents what was proposed to be done, and it had
18 been communicated to residents through the newsletter,
19 and we did what we said we were going to do in that
20 newsletter, which was change the floor numberings, and
21 then several months later, through the Compact, came the
22 request to change it back, and we felt that actually
23 changing it back would likely cause even more confusion
24 than there was at that time. We felt that it was
25 probably a change that — you know, so it hadn't — this

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1 issue hadn't been addressed or raised at the time that
2 we were consulting residents on doing it or informing
3 residents that this is what we were proposing to do.

4 Q. Right. Let's just see how this then evolves.

5 Can we go to {TMO10010093}. This is an email chain
6 in early October 2015, and if we go to start with,
7 please, at pages 2 to 3 {TMO10010093/3}, we can see that
8 Judith Blakeman writes to you and Claire Williams in
9 respect of a number of concerns raised by the
10 Grenfell Compact at a councillor's surgery on the
11 previous Saturday. If you look at the top of page 3,
12 you see that's what she says in the first paragraph
13 there. She lists a number of issues, as she calls them,
14 at 1 and following.

15 If you go down, please, to the bottom of your
16 screen, about halfway down page 3, you see item 6, and
17 she refers to floor numbering and says this:

18 "They [that's the residents] continue to have
19 an issue with the numbering of the floors, as do the
20 ward councillors. Whatever the Post Office requires,
21 the new system of numbering is not effective and could
22 prove dangerous in the event of an emergency. The
23 notices about the floor number changes are not prominent
24 or secure and in any case would not be helpful to
25 children, anyone who does not read English or indeed

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1 anyone with literacy problems. The solution the
2 residents propose is that the lower floors should have
3 a new name, such as 'Lower Grenfell'. We believe that
4 this issue does require some further consideration."

5 If we go up to page 1 {TMO10010093/1}, we can see
6 that you've added some comments at the end of her
7 points, and you are writing back to Judith Blakeman here
8 by way of response, and you take her numbering.

9 Now, unfortunately this version of this document
10 doesn't show your comments in any differentiation,
11 colour or otherwise, but you can see from item number 1
12 that you have added at the end of her paragraph, "Noted
13 and Agreed". Do you see that?

14 A. Yes.

15 Q. So I can take it, I think, that these are your words.

16 If we go down to the bottom of page 1 and look at
17 paragraph 6, we can see that's where her query starts.

18 Over the page to page 2 {TMO10010093/2}, we can see
19 you have added at the end, after the words "does require
20 some further consideration", you have written:

21 "We will review this again and come back to you."

22 Just to confirm, those are your words; yes?

23 A. I think so, yes.

24 Q. Did you in fact review that issue and go back to
25 Councillor Blakeman?

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1 A. Yes, I believe I did.

2 Q. What was the result of that?

3 A. We explained the rationale behind the changes in the
4 floor numberings. There had been some misinformation
5 going around the block that postcodes were going to
6 change and flat numbers were going to change, and
7 neither of those things were true. So we just wanted to
8 clarify that point.

9 Also explain that we'd taken the advice of the
10 planners on this and the planners had advised that the
11 clearest way of numbering floors is to start at zero at
12 the bottom floor and upwards, rather than having zero,
13 minus 1, or whatever on the other floors below, which in
14 itself could be confusing.

15 So we were trying to come across a solution which
16 satisfied the — well, I don't think we were going to
17 satisfy either party at this juncture. We were in
18 a position where we needed to try and put in place
19 a solution and clarify what we were doing.

20 But my concern was that we had consulted residents,
21 informed them of what we were doing, had changed things,
22 and felt that actually changing it back to the original
23 would have confused matters even more. So it was — we
24 were in a tricky position at this time.

25 Q. The complaint being made here was in fact, as we've seen

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1 it, that the new system of numbering was not effective,
2 as well as the fact that the notices about it were
3 insufficient.

4 What did you do about the notification that the
5 floor numbers had now changed?

6 A. Well, so the two — the floor numbering being effective,
7 I think the system that we had put in place was clear.

8 It was different, but it's a system that was being used
9 on a lot of other estates as well, including in the
10 TMO's housing stock, so it — the signage, we needed to
11 get the permanent signs in place so that people — there
12 was clear signage throughout the block that didn't fall
13 off the walls or couldn't be removed easily, and that's
14 what we did, as we — so Janice Wray and Claire Williams
15 worked at ensuring that the contractors put in place
16 improved temporary signage, and ultimately put in place
17 clear, permanent signage.

18 They also talked to the Fire Brigade to assess — to
19 get their view and ensure that they were comfortable
20 with that approach, and my understanding is that they
21 were.

22 Q. Can we go to {RBK00052621}, please. This is an email
23 some two months later, 1 December 2015, when, as we can
24 see, Councillor Blakeman emails Janice Wray and the
25 complaints team, and you, with this, and she says:

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1 "In the event that one of the emergency services
2 receives an urgent callout to attend to a problem in
3 Grenfell Tower — such as a fire within a flat — how they
4 will easily locate the address? There are no signs,
5 either beside the lifts or in the lifts, to indicate the
6 new floor numbers where the flats are located. The
7 previous very sensible numbering system has as you know
8 been changed, causing significant confusion, especially
9 for visitors. If the emergency services had to attend
10 a flat urgently, this is not helpful.

11 "Please do not just put up a temporary piece of
12 paper setting out the new floor numbers. Each time this
13 has happened it has been removed.

14 "I would appreciate a swift response."

15 Now, when you received that, you obviously knew what
16 it was about because it related back to the discussion
17 that you had told Ms Blakeman that you would investigate
18 two months previous.

19 A. Yes, but I think I had — I would have responded on the
20 issue of the floor numberings at the following Compact
21 meeting, I assume.

22 Q. At the Compact meeting, because we haven't seen any
23 email or message back to her telling her what the
24 results of your review were and what decision you had
25 made about item 6 in the email of 2 October we've just

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1 looked at.
 2 A. I think it was discussed at the following Compact
 3 meeting.
 4 Q. What was the upshot of that discussion, the result of
 5 that —
 6 A. As I've described, that we felt it would cause more
 7 confusion to change back to the original numbering and
 8 were sticking with that approach, but were going to get
 9 in place the new permanent signage.
 10 Q. Right.
 11 She says:
 12 "There are no signs, either beside the lifts or in
 13 the lifts, to indicate the new floor numbers where the
 14 flats are located."
 15 First of all, was that true?
 16 A. I don't know. I would assume that that would have been
 17 checked by Janice, Claire Williams and presumably the
 18 estate services officers, who were responsible for
 19 ensuring that communal inspections were carried out.
 20 Q. Right.
 21 Let's see what happens next.
 22 If you go to {RYD00059989}, this is the next day,
 23 2 December 2015, and you can see the second email down
 24 on that page, Gary Martin of Rydon emails
 25 Claire Williams, and Lynda Prentice and others at Rydon,

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1 2 December:
 2 "Hi Claire
 3 "New floor numbers have been put up on the riser
 4 doors on each floor complete with individual flat
 5 numbers and a directional arrow to show which direction
 6 they are in on exiting the lifts.
 7 "I have also to [something] a 'master' sheet up in
 8 the lobby of the second floor.
 9 "Also the now incorrect floor numbers in the
 10 stairwell have been obliterated and I will put some
 11 temps up in there also.
 12 "I have chased our QS for the permanent signs and it
 13 appears that we are waiting for the instruction to go
 14 ahead and for each signs contents (we have the brand
 15 guideline document)."
 16 Were Councillor Blakeman's concerns registered as
 17 a formal complaint or enquiry within the complaints
 18 procedure?
 19 A. I don't remember. I mean, her enquiry would have been,
 20 I presume, treated as a member's enquiry, and it was
 21 reported to the complaints team, so all — we asked
 22 Councillor Blakeman to ensure that all communication
 23 from her was done through the complaints team so we
 24 could keep a clear track on all of the issues that she
 25 raised across the whole of the stock and ensure that she

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1 got responses.
 2 Q. Right. The reason I ask that is that it looks from this
 3 email, and tell me if this is wrong, that Gary Martin
 4 took steps to remove the old now erroneous floor
 5 numbering the day after Councillor Blakeman's second
 6 email, the 1 December email, on this question.
 7 Is it right that action was only taken in response
 8 to her complaint at that point?
 9 A. I don't know.
 10 Q. Were you aware of any guidance or regulations or advice
 11 that the TMO should follow for floor numbering within
 12 Grenfell Tower?
 13 A. Sorry, in what respect?
 14 Q. Were you aware of any guidance or advice or regulation
 15 that TMO should follow when numbering the floors?
 16 A. In respect to changing the numbers or —
 17 Q. Yes, or clearly signing.
 18 A. Okay.
 19 Q. Clearly identifying the right floor numbers.
 20 A. No, it ... I would assume that there would be
 21 a responsibility to ensure that signage is clear so that
 22 people know which floor they're on.
 23 Q. Right.
 24 Can we go to {TMO10027592}, please. This is
 25 an email on 15 December 2015 at the bottom of page 1,

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1 over to page 2, from Janice Wray to you, copied to
 2 Barbara Matthews, and the subject is, "Grenfell Tower —
 3 signage & responses to Cllr Blakeman":
 4 "Hi Peter
 5 "Further to the initial query from Cllr Blakeman on
 6 this issue on the 1st Dec, she sent in a further e-mail
 7 with photo attached last Thursday (copy attached). Just
 8 to confirm —
 9 "■ [As] per your request I asked the LFB Station
 10 Manager for North Kensington to confirm when his crews
 11 had carried out the last of their regular
 12 familiarisation visits to Grenfell and he advised that
 13 this was undertaken in October 15.
 14 "■ I visited the block yesterday to inspect the
 15 current signage and fed back my comments (all relatively
 16 minor) to Claire who has instructed Rydon to address
 17 them asap. Specifically, I noted ..."
 18 And she explains what she has noted there.
 19 Now, if you look at the next email up, the same day,
 20 you asked Claire Williams to tell Rydon to complete the
 21 suggested actions that had come from Janice Wray. Do
 22 you see, you say:
 23 "Claire
 24 "Can you please instruct Rydon to action all of
 25 these points by close of play Thursday? Please talk to

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1 me if there are any points that cannot be resolved?"

2 Then you go on in the next—but—one paragraph to say:

3 "Janice — I will respond to Cllr Blakeman. Thanks."

4 Now, Janice Wray says, as I've shown you, that she

5 contacted LFB on your request. Is that right? Did you

6 ask Janice Wray to contact the LFB on this subject?

7 A. I don't remember.

8 Q. Right. Did you ask Janice Wray to carry out the

9 inspection she says she did carry out?

10 A. Sorry, when you say contact LFB on my request, that

11 was — I think I asked her to get their view on the

12 changes of the numbering, because I think that we had —

13 we were getting slightly conflicting information from

14 different parties, planners, Royal Mail, and the

15 Fire Brigade, and I think I was suggesting that Janice

16 should check with the Fire Brigade about what they felt

17 was the clearest way of ensuring that the floors are

18 numbered accordingly.

19 Q. I see. She is telling you here that she had asked the

20 LFB station manager when they'd carried out their last

21 regular inspection, regular familiarisation —

22 A. I don't think that was the question there. The question

23 would have been: is this floor numbering protocol

24 appropriate? Whereas that sounds like a different

25 question to me.

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1 Q. I see. Well, that's what she says in her email to you.

2 We don't see you going back to her in your email back to

3 her saying, "You have asked them the wrong question".

4 A. No, I think there was a separate line of dialogue with

5 the Fire Brigade.

6 Q. Well, right. Why do you say that, given the topic of

7 this email, which is signage and responses to

8 Councillor Blakeman?

9 A. Because this is about signage. The other issue I was

10 raising was about the floor numbering per se.

11 Q. Right.

12 Well, did you contact Janice Wray only after the

13 Grenfell Compact had raised their concerns about the

14 floor numbering in the August matrix of issues?

15 A. Sorry, could you ask that —

16 Q. Yes, I'll put it a different way, I'm sorry.

17 It looks from what I've shown you so far that your

18 contacting Janice Wray to investigate the concerns about

19 the floor numbering only happened after seeing the

20 August 2015 matrix which had identified the problem.

21 A. Erm ... well, no, there had been a previous — there's

22 a previous position before that, which is where we

23 communicated to residents in our newsletters that we

24 were going to change the new flooring and everyone had

25 been informed of that. So we were basically acting on

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1 what we had informed residents we were going to do,

2 based on the advice we'd received from planning, and we

3 were — and it was only later through the Compact that

4 these issues were raised as residents not being happy

5 with the new approach. So there was a bit of a lag in

6 between. So we'd actually done it, and then we received

7 the feedback from the Compact that some residents

8 weren't happy and didn't think it was a sensible

9 approach.

10 So I think there are two separate issues here. One

11 is about the signage —

12 Q. Yes.

13 A. — and one is about the actual numbering and the

14 protocol around numbering.

15 Q. Yes.

16 A. So I'm getting confused in the question.

17 Q. Yes, I understand, and I understand why you are.

18 In relation to the signage, isn't it right to say

19 that actually this is something that came out of the

20 matrix of issues in August 2014 but was taken forward by

21 Councillor Blakeman in her October email?

22 A. I thought the matrix referred to the floor numbering

23 per se, not the signage.

24 Q. Exactly. So it evolved, the point evolved. What I'm

25 suggesting to you is that the floor signage problem

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1 evolved from something which was already the subject of

2 debate between you and the Grenfell Compact.

3 A. I don't know.

4 Q. Looking at the email below on this page, Janice Wray to

5 you, you can see in the second bullet point:

6 "The stencilling of floor numbers within the

7 staircase stopped is effective but currently starts at

8 the 4th floor. The lobbies in the stairwell below the

9 4th floor down to ground level should also be

10 stencilled."

11 This stencilling, did you know if this was intended

12 to be permanent arrangement or only a temporary one?

13 A. I don't.

14 Q. Once the refurbishment was finished, whose role was it

15 to ensure that the signage at Grenfell Tower was

16 maintained?

17 A. That would be — through the defects period, Rydons

18 would have a responsibility if there were some defective

19 issues. On an ongoing basis, it would be done through

20 the estate services inspections and responsive repairs.

21 Q. I now want to ask you some questions about gas, if

22 I can. I'm going to show you your first statement,

23 please, first of all at page 25 {TMO00000892/25}. You

24 deal with this en bloc between pages 25 and 27 at

25 paragraphs 134 to 143, and I won't read them all out to

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1 you.
 2 Can I just look at paragraph 139 with you, please,
 3 on page 26 {TMO00000892/26}. You say there:
 4 "National Grid advised the TMO that it wished to run
 5 gas pipes up the stairway. They considered this to be
 6 the only place to run the pipes as there was no feasible
 7 route to run the pipework externally. The TMO was
 8 powerless to prevent that as National Grid were the
 9 statutory undertakers. Legally National Grid had the
 10 powers to specify how it wished to install its
 11 infrastructure. TMO were concerned by the proposals and
 12 needed reassurance and commitment from National Grid
 13 that what they were proposing was safe."
 14 If we go on to page 27 {TMO00000892/27}, you
 15 continue on this theme at paragraph 141. You say:
 16 "Following internal discussions, it was also agreed
 17 that Carl Stokes, the TMO's retained fire expert, should
 18 visit the Tower to give us his view on the location of
 19 the pipe work. Carl Stokes produced a report concluding
 20 that the location of gas pipes was not a problem per se
 21 provided they were fully fire-stopped."
 22 Then at 143 you say:
 23 "The work of boxing in and fire stopping progressed
 24 slowly and was the subject of many complaints by TMO to
 25 National Grid. I was aware that Anthony Cheney, who was

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1 Acting Head of Contract Management, Assets and
 2 Regeneration and who reported to me at the time, was
 3 chasing National Grid on a very regular basis but often
 4 his emails received no reply at all, or promises were
 5 made which were not kept. My understanding now is that
 6 some of the boxing in work may not have been completed
 7 by the time of the fire."
 8 Now, can I show you one particular complaint that
 9 was made by a resident. Can we go to {CAD00003046}.
 10 Now, this is an exhibit to a witness statement by
 11 Mr Martin.
 12 Can we please go down to the foot of the email
 13 string at page 6 {CAD00003046/6}. Here we have an email
 14 from Shah Ahmed dated 20 April 2017 to Daniel Wood,
 15 copied to Robert Black and Councillor Blakeman, not to
 16 you:
 17 "Subject: Recent visit by the National Grid to my
 18 flat ref: Main gas pipe through my front door.
 19 "Dear Mr Daniel Wood,
 20 "This is to inform you that this morning I had
 21 a visit from the National Grid without prior notice or
 22 letter either from the KCTMO homeownership or from the
 23 landlord RBKC that they have decided to put the gas pipe
 24 through my front door. The national grid also tried to
 25 demonstrate the layout of the pipe and I was extremely

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1 horrified and shocking of the layout.
 2 "Let me re iterate that, I find it unreasonable,
 3 unacceptable and unprofessional, forceful entry to my
 4 flat. I have no contractual agreement with the National
 5 Grid but with my landlord as leaseholder.
 6 "Let me categorically confirm that to the
 7 KCTMO/National Grid and to you that, we have no
 8 [intention] whatsoever the main gas pipe coming through
 9 my front door under any circumstance and events.
 10 "Please confirm."
 11 Now, this I think is copied on to you, if you look
 12 above that, by Daniel Wood the same day. Do you see?
 13 A. Yes.
 14 Q. And he just says:
 15 "Hi Peter,
 16 "Please see below, any idea what's happened here and
 17 who would be best placed to respond?"
 18 Then if you go up to page 5 {CAD00003046/5}, you see
 19 that you go back to Mr Wood, Daniel Wood, a few minutes
 20 later, or perhaps a little bit later that afternoon, to
 21 be fair to you, a few hours later, and you say:
 22 "Hi Daniel
 23 "There was a leak on the gas mains and National Grid
 24 have had to rerun a new mains throughout the block.
 25 "National Grid will have to run the supply into

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1 residents homes if residents want one.
 2 "How this is done is a discussion that Mr Shah will
 3 have to have with National Grid. It is not our
 4 responsibility.
 5 "I will ask Anthony to reply to Mr Shah along these
 6 lines."
 7 Then the address is given in the emails that then
 8 come through above that. I don't need to show you that.
 9 Now, the question I have is: did you ask
 10 National Grid to send you a report or a certificate to
 11 ensure or assure the TMO that the works to all the gas
 12 work mains risers in the block were safe?
 13 A. There was quite an extensive and complicated
 14 correspondence between the contracts management team and
 15 National Grid to try and establish what they were
 16 proposing to do, and it had gone on for some time, and
 17 our preference was that they removed the gas supply from
 18 the block. We felt that running the new gas supply
 19 through the block was unnecessary and felt that they
 20 should buy out the residents and put in electric. It
 21 felt like the best way of avoiding running this pipe at
 22 all. But they weren't prepared to do that.
 23 And there was then an extensive correspondence
 24 between the contracts management team and National Grid
 25 to try and establish quite what they were doing, and to

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1 get confirmation that the works met the requirements,
 2 and we talked to building control and we also got
 3 Carl Stokes, the fire risk assessor, to give an opinion
 4 on what was being proposed too.
 5 Q. You see, what I'm really after is, if you go back to
 6 page 5 {CAD00003046/5}, you say "How this is done is
 7 a discussion that Mr Shah will have to have with
 8 National Grid ... not our responsibility", what I'm
 9 seeking to understand is why you thought it wasn't the
 10 TMO's responsibility to ensure that whatever gas works
 11 or piping works were done within the building was solely
 12 in the National Grid's responsibility to Mr Shah
 13 directly in respect of which you had no responsibility.
 14 Can you explain that?
 15 A. Sorry, I don't understand the question.
 16 Q. I will repeat it.
 17 Why was it that you thought that it wasn't the TMO's
 18 responsibility to ensure that whatever gas works were
 19 done within the building were solely the National Grid's
 20 responsibilities to Mr Shah and not the TMO's
 21 responsibility?
 22 A. The National Grid were the statutory authority here, it
 23 was their supply through the building, and them being
 24 the statutory ... and the expert in this, I felt that
 25 they were responsible for carrying out these works in

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1 accordance with the regulations. They were the experts.
 2 Q. Yes. Given Mr Shah's concerns about safety, why did you
 3 think that it wasn't the TMO's responsibility at all,
 4 but something for Mr Shah to take up directly with the
 5 National Grid without your involvement?
 6 A. The issue I think I'm talking about there is that
 7 Mr Shah at the moment — at this stage doesn't have
 8 a gas supply, so if he wants a gas supply, he would need
 9 to talk to the National Grid who would provide him with
 10 the supply into his home. There was limited scope for
 11 where that supply could be run within the building, and
 12 that's what National Grid were struggling with I think
 13 here really by — and came up with having to run it
 14 through the communal stairwell. But that was what they
 15 chose to do. Our only alternative that we — our
 16 preferred alternative would have been that they removed
 17 the gas supply altogether and put electric in.
 18 Q. In relation to safety of the works through the
 19 stairwell, did you at any time seek some kind of report
 20 or assurance or certification from the National Grid, or
 21 Cadent, in fact, that the works they were proposing were
 22 safe?
 23 A. We got advice from building control and from the fire
 24 risk assessor, and there was extensive communication
 25 from the contracts management team and from Janice Wray

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1 in the health and safety team to National Grid to raise
 2 our concerns —
 3 Q. Is the answer to my question yes or no?
 4 A. I'm telling you what happened.
 5 Q. I know. Well, tell me it simply: did you get any report
 6 or assurance or certification from the National Grid
 7 that the works they were proposing were safe?
 8 A. I haven't had sight of all of the correspondence. That
 9 was between the teams that I've described.
 10 Q. I see.
 11 Do you accept that it was the TMO's responsibility
 12 as the manager of the building to obtain or to be
 13 satisfied directly by an assurance from the statutory
 14 undertaker so that it in turn could reassure its
 15 residents?
 16 A. So that was why we were getting — asking for opinion
 17 from building control and from the fire risk assessor
 18 raising the concerns that had been raised and trying to
 19 get clarification on that point.
 20 Q. Do you accept that it wouldn't have been for Mr Shah
 21 himself to obtain that direct assurance from the
 22 National Grid himself?
 23 A. And I don't think that's what this is suggesting.
 24 Q. Now, let's go to another document, {TMO10017418}.
 25 This is a copy of the response that you sent to

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1 Lee Chapman and Tunde Awoderu's complaint about the gas
 2 works which they made on 6 June 2017, only a week before
 3 the fire. You can see it's come from Catherine Dack,
 4 but actually, if you look at page 3 {TMO10017418/3},
 5 it's come from you.
 6 If we look at the actual complaint that's made, what
 7 you're responding to appears on page 7 {TMO10017418/7}.
 8 It starts on page 7 and it's dated 23 May 2017. Then on
 9 page 10 {TMO10017418/10} is the actual complaint.
 10 If we go to the response that you send on page 1
 11 {TMO10017418/1}, under the rubric "Stage 2 Complaint
 12 Response — Various issues at Grenfell Tower", you
 13 confirm receipt of the complaint of 20 April — in fact,
 14 it had evolved since then — and then under "Gas Mains
 15 Located in the Stairwell", you say this:
 16 "You complain that residents are concerned about the
 17 health and safety implications of National Grid locating
 18 the new gas mains in the stairwell of Grenfell Tower.
 19 "The correspondence from Sacha Jevans and
 20 Anthony Cheney has explained that responsibility for
 21 this work rests with National Grid and they are
 22 responsible for ensuring the works meet necessary
 23 standards. KCTMO has reviewed the proposals with our
 24 Fire Safety consultant and with the Fire Brigade who
 25 have confirmed that the proposals are acceptable.

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1 "However, at this stage, the works are not complete
2 and National Grid are yet to complete the work to
3 install a fire-rated boxing around the pipe.
4 I therefore propose to keep this complaint open until
5 this work is complete at which point we will review the
6 works and take further professional advice to confirm
7 that the installation is satisfactory."

8 Did you in fact investigate the case?

9 A. Yes.

10 Q. Now, it's right that Carl Stokes provided advice on the
11 installation of the gas pipes. Did you see that at the
12 time?

13 A. Yes.

14 Q. It's at {CST00001240}, I'll show it to you. It's
15 a letter of 30 January 2017, and there it is. I'm not
16 going to read it all out to you.

17 It's right, isn't it, as we've seen, I think, that
18 the GTLA had asked for a health and safety certificate
19 or reports confirming that the installation of the gas
20 pipes was safe?

21 We haven't seen that you disclosed Carl Stokes'
22 letter of 30 January 2017 to the GTLA. That's right,
23 isn't it? We don't think you did.

24 A. I don't recall, but maybe not, but --

25 Q. No. Do you know why you didn't disclose Carl Stokes'

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1 letter or report?

2 A. I assume because we'd left that aspect of the complaint
3 open and wanted to review the matter on completion so we
4 could confirm back at that stage.

5 Q. Right.

6 Now, you refer to the fact that the LFB had
7 confirmed that the proposals were acceptable. Were you
8 aware that the LFB had told Janice Wray that they were
9 not happy with the gas riser because it was in the means
10 of escape?

11 A. No, I wasn't aware of that.

12 Q. Right. Let's look at {TMO10016548}, then, please.

13 Looking at this email chain, this is a chain of
14 emails between Janice Wray and John Allen in early
15 April 2017. I take it you didn't see these.

16 Just looking at the first email on that page, four
17 paragraphs down, Janice Wray is telling John Allen:

18 "LFB are saying (thou[sic] not yet in writing) that
19 they are unhappy about the riser being on the means of
20 escape -- but as it is already installed not sure this
21 will have any input."

22 Perhaps she means "impact", I don't know.

23 Did you know that the LFB had said what she is
24 recorded there as saying to John Allen?

25 A. I'm not aware.

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1 Q. Right.

2 A. But we were unhappy it was there as well.

3 Q. You referred in your email I've just shown you to
4 keeping the complaint open until the work was completed.
5 How would the complaint have been dealt with after the
6 works were completed?

7 A. Well, in the complaint I'm explaining the works that
8 will be done as part of the National Grid works, and
9 what we wanted to do was to have the opportunity to
10 inspect that and get any views of any other authorities
11 on that matter before closing the complaint. So we
12 wanted to ensure that it was resolved.

13 Q. If the subject matter of the complaint was the location
14 of the works themselves, how would the complaint have
15 been dealt with after the works were completed?

16 A. Because it would allow the complaint -- it would allow
17 the works to be inspected and assessed as to whether
18 they meet the standards.

19 Q. So you would proceed with the works, finish them off and
20 then inspect them and see if they complied with the
21 standard, was that how you were thinking of it?

22 A. Well, no, the final piece of the works as I understood
23 it at this time was to install the fire-rated boxing
24 around the pipework, and that work was under way,
25 I understood, but not complete.

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1 Q. So does that tell us that in fact, although you say you
2 were keeping the complaint open, you were only keeping
3 it partly open? In other words, you had already decided
4 to keep the pipes in the stairwell but make sure that
5 they were boxed in properly?

6 A. If it was my decision I wouldn't have had the pipes
7 there, I would have had the gas removed from the
8 building altogether. So it wasn't my choice. This was
9 something that National Grid imposed and they were
10 inflexible around this, said this was the only place it
11 could go, and we had no choice, really, in this matter.

12 Q. I was really seeking to understand how your complaints
13 procedure was working. You said you would keep the
14 complaint open, but in fact it's right, I think, from
15 what you're telling us, that the only aspect of the
16 complaint that you were keeping open was the question of
17 the efficacy of the firestopping around the boxing?

18 A. Yes.

19 Q. Can I just ask you then finally, as a final topic, about
20 the self-closer on flat 136. Can we look, please, at
21 your first witness statement at page 28

22 {TMO00000892/28}. You say in paragraph 148 there this:

23 "There was also a concern raised about an empty flat
24 door being left open over a weekend and concern that
25 there was no door closer working to close the door. The

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1 concern expressed was in relation to security rather
 2 than any issue of fire safety. This was investigated
 3 and it was established that a Rydon contractor had
 4 worked in the flat following flooding from the
 5 re-positioning on the HIU in the flat above and had left
 6 the front door open. The door closer was repaired and
 7 an apology was given. Rydon were instructed to ensure
 8 it did not happen again."
 9 You're referring here, I think, aren't you, to
 10 a concern or issue raised by Edward Daffarn in relation
 11 to flat 136, which was next door to his?
 12 A. Yes.
 13 Q. That flat at the time was empty, wasn't it, it was void?
 14 A. Yes.
 15 Q. Your evidence here, as we've seen it on the page, is
 16 that the door—closer was repaired; yes?
 17 A. Erm —
 18 Q. That's what you say.
 19 A. I think that's incorrect. I didn't check that the
 20 door—closer was repaired.
 21 Q. Why did you say it was?
 22 A. That's incorrect. That's been wrongly minuted —
 23 wrongly noted there.
 24 Q. What should it have said?
 25 A. The door was closed and an apology was given. That was

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1 what was detailed in the response to Mr Daffarn. So
 2 I apologise, that's a mistake in my witness statement.
 3 Q. Can you explain how that happened? How did you make
 4 that mistake? Can you explain why your —
 5 A. I think my solicitors have drafted that wrong.
 6 Q. When you read this statement, I had assumed, perhaps
 7 wrongly, that you had read it very carefully before
 8 signing it.
 9 A. It's a very long statement. I'm sorry.
 10 Q. It is. To be fair to you, it is a long statement. It's
 11 52 pages long. But you didn't pick that up?
 12 A. I didn't pick that up, no.
 13 Q. Right.
 14 Can we look at Mr Ed Daffarn's complaint, then,
 15 {TMO00830538/8}, please. It starts at the top of
 16 page 8. It's rather misleading, it looks as if it
 17 starts at the bottom of page 7, it actually starts at
 18 the top of page 8, and it's a long email to
 19 Fola Kafidiya of 2 September timed at 16.51. Do you see
 20 that? Your response to him is on page 7
 21 {TMO00830538/7}.
 22 A. I think this is his complaint —
 23 Q. I have misled you, my fault.
 24 A. This is his response to my response to him.
 25 Q. You're right. Page 8 is his complaint, 2 September, and

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1 page 7 is your response to it.
 2 Now, you say in your response in the third
 3 paragraph:
 4 "I have investigated this matter and Rydon
 5 acknowledge that they left the door open in error and
 6 apologise for this mistake. The door was in working
 7 order and was able to be closed by pulling it shut."
 8 What investigations did you carry out into that
 9 complaint?
 10 A. I spoke to Simon Lawrence in relation to the issues that
 11 were raised from Rydon's and he confirmed to me that
 12 they'd left the door open in error, but it was — they
 13 were able to close the door.
 14 Q. Did you speak to Mr Daffarn?
 15 A. I didn't.
 16 Q. Why is that?
 17 A. I don't recall.
 18 Q. Now, you have said here that the door was in working
 19 order, but you said in your statement, as I've shown
 20 you, that the self-closing device required repair.
 21 You've now said that that part of your statement was an
 22 error.
 23 When did you first discover that that part of your
 24 statement was an error?
 25 A. It's the first time I've read it.

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1 Q. How did you conclude at the time, 2 September 2015, that
 2 the door was able to be closed by pulling it shut?
 3 A. Because that's what Simon Lawrence told me.
 4 Q. Right.
 5 If we go to {TMO00830538/8}, please, which is what
 6 you're responding to.
 7 A. No.
 8 Q. You're right. This is what he is responding to,
 9 I think.
 10 A. This is his response to me.
 11 Q. His response to you. He starts by saying:
 12 "Dear Ms [Kafidiya],
 13 "I would like to complain to you that Mr Maddison
 14 from the TMO has responded to my concerns with regards
 15 the front door of 136 Grenfell Tower being left open
 16 over the weekend of 17th August with a complete pack of
 17 lies.
 18 "In Mr Maddison's email to me he claims that the
 19 front door was not broken and was simply left open.
 20 This is just not true and it would appear that he has
 21 not taken the time to read my explanation of what
 22 happened when I first found the door to be open.
 23 "As I explained in my original complaint to the TMO,
 24 I tried pulling the door shut and it was broken. I made
 25 this point perfectly clear when I phoned the 'Out of

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1 Hours Team' and when I informed my neighbours and local
 2 Councillors.
 3 "Maybe Mr Maddison is calling me a liar?
 4 "I would like to ensure that this complaint is taken
 5 to level two and that the TMO apologise for lying to me
 6 and get their contractor, Rydon, to tell the truth and
 7 admit the door was unable to shut and, therefore,
 8 remained open all weekend?
 9 "I am also completely dissatisfied with the
 10 investigation that Mr Maddison conducted with regards to
 11 the totally unacceptable response that I received from
 12 the Out of Hours Team and would like the conduct of the
 13 worker and the response of the TMO on the night of the
 14 28th Aug to be properly investigated."
 15 Now, I've read that to you at some length.
 16 Did anybody at the TMO or within the TMO ask you
 17 about the complaint?
 18 A. I'm sure if it was considered at the next stage they
 19 would have spoken to me about it. I don't remember who
 20 that was or I don't remember the conversation.
 21 Q. Did anybody specifically ask you to tell them what you
 22 had done to satisfy yourself that the door—closer was
 23 not broken?
 24 A. I don't remember that now.
 25 Q. Can we look at page 9, please, in this email run

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1 {TMO00830538/9}, which is the complaints team's response
 2 on behalf of Sacha Jevans to Mr Daffarn. It's the
 3 second part of the page on page 9. Do you see that?
 4 A. Yes.
 5 Q. It's from the complaints group or complaints team, and
 6 it says in the second half of the first paragraph:
 7 "I have investigated the matter and consider that
 8 Mr Maddison's assessment of the situation was correct
 9 and that the door of 316 [136, that should say] was in
 10 working order and was able to be closed by pulling shut.
 11 I therefore do not uphold your complaint."
 12 Did you play any part in writing that response?
 13 A. Not that I remember.
 14 Q. Not that you remember. So it's possible, is that right,
 15 that you might have done?
 16 A. No, I don't —
 17 Q. Right.
 18 A. I don't think I did.
 19 Q. Do you know who it was who actually investigated?
 20 A. I don't.
 21 Q. Do you know what they did?
 22 A. I don't.
 23 Q. Do you know what the factual basis was of the statement
 24 that your assessment was correct?
 25 A. I don't.

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1 Q. The complaint was escalated to stage 3, wasn't it?
 2 A. I don't know.
 3 Q. You don't know.
 4 Do you remember whether anyone from the TMO asked
 5 you about anything to do with the stage 3 complaints
 6 process in respect of this complaint?
 7 A. I can't remember.
 8 Q. Did anybody from the TMO actually inspect the door at
 9 any stage of this complaints process?
 10 A. I don't know.
 11 Q. Did anybody speak to Mr Daffarn directly about his
 12 complaint during this complaints process?
 13 A. My role was to deal with the stage 1 complaint, which
 14 I did, and I think that's the extent of my involvement.
 15 Q. Did anybody carry out any independent investigation into
 16 this complaint?
 17 A. As I say, my knowledge and understanding is just dealing
 18 with stage 1.
 19 Q. Given Mr Daffarn's evident extreme upset at being
 20 contradicted on a matter he had himself observed at
 21 first hand, do you remember whether any steps were
 22 taken, either by you or anyone else at the TMO, to meet
 23 Mr Daffarn and explain to him why you considered that
 24 his observation that the door—closer was broken was
 25 wrong?

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1 A. I'd explained my understanding from my investigation at
 2 stage 1 by talking to Rydons. I'd explained that in
 3 writing to Mr Daffarn, and that was the extent of my
 4 involvement here.
 5 Q. Have you changed your evidence about the door—closer
 6 needing to be repaired that we saw in your statement
 7 having heard Mr Daffarn examined on it?
 8 A. I don't see what I would have heard that would have made
 9 me change my evidence.
 10 Q. Identifying the fact that it was repaired rather
 11 indicated that it was broken and that in fact you were
 12 wrong at the time.
 13 A. No, my statement was wrong. I had no reason to believe
 14 that — my expectation was that, as that property was
 15 empty, it was — Rydons were working in there because
 16 there had been a flood from above, and any works to that
 17 door would have been done as part of the voids work to
 18 that property, so that would have been dealt with
 19 through Repairs Direct as part of the void — so it
 20 wouldn't have been dealt with as part of Rydons or any
 21 of the works Rydons were doing in that property.
 22 Q. I feel bound to suggest to you that when you said in
 23 your statement that the door was repaired, that was
 24 true, and that was true because it was broken earlier.
 25 A. I don't know, I didn't inspect it. I took at face

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1 value — I had — I was in a position where I had
 2 Mr Daffarn saying one thing, I had Rydons saying
 3 another, and there didn't seem to be any way that
 4 I could resolve those two. It didn't seem like an issue
 5 that — I couldn't see any alternative way of resolving
 6 the impasse between the two views. What I did was
 7 apologise for — the door clearly shouldn't have been
 8 left open over the weekend and I passed on that apology.
 9 I certainly didn't call Mr Daffarn a liar.

10 MR MILLETT: Yes. Mr Maddison, thank you.

11 I've come to the end of my prepared questions,
 12 Mr Chairman.

13 SIR MARTIN MOORE-BICK: Right.

14 MR MILLETT: It would be appropriate then to take, I think,
 15 the afternoon break and the question break at the same
 16 time, and perhaps have a slightly longer afternoon
 17 break.

18 SIR MARTIN MOORE-BICK: I was going to suggest we could
 19 break for 20 minutes this time.

20 MR MILLETT: Yes. If we need more time — because
 21 I appreciate it's been a long time —

22 SIR MARTIN MOORE-BICK: Then I hope there won't be a request
 23 for even more time.

24 MR MILLETT: Quite. Well, one never knows. But I'll come
 25 back to you if I need more time, but I'm grateful.

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1 SIR MARTIN MOORE-BICK: All right. Thank you very much.
 2 Well, there you are, Mr Maddison. Mr Millett has
 3 got to the end of what he thinks he needs to ask you,
 4 but as you know only too well, there may be some further
 5 questions.

6 So we'll break now until 3.30, and then we will see
 7 whether there are more questions for you at that stage.

8 THE WITNESS: Okay.

9 SIR MARTIN MOORE-BICK: As before, please don't talk to
 10 anyone about your evidence.

11 THE WITNESS: Thank you.

12 SIR MARTIN MOORE-BICK: All right? Thank you very much.
 13 (Pause)

14 Right, 3.30, then, please. Thank you.
 15 (3.11 pm)

16 (A short break)

17 (3.33 pm)

18 SIR MARTIN MOORE-BICK: Right, Mr Maddison, we will see if
 19 there are any more questions for you.

20 Yes, Mr Millett.

21 MR MILLETT: Yes, just one or two, Mr Maddison.

22 Can we go back to the topic of the flat front door
 23 at flat 136, and go back to where we were, which was
 24 {TMO00830538/9}, which is the response to Mr Daffarn
 25 about his insecure front door observation, where we

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1 were. I read to you the last—but—one sentence of the
 2 main paragraph there. I'll just read it to you again,
 3 it says:

4 "I have investigated the matter and consider that
 5 Mr Maddison's assessment of the situation was correct
 6 and that the door of [136] was in working order and was
 7 able to be closed by pulling shut."

8 My question is this: if it had to be pulled shut,
 9 did you not realise at the time that it was no longer
 10 a self-closing fire door?

11 A. This wasn't my response. This was the response to the
 12 stage 2 from Sacha Jevans.

13 Q. All right. Well, let's use yours, then. Let's go up to
 14 page 7 {TMO00830538/7}. This is your email in response
 15 to his on page 8.

16 A. Yes.

17 Q. The fourth paragraph, you say in the second sentence:

18 "The door was in working order and was able to be
 19 closed by pulling it shut."

20 Did you not realise at the time that if a door had
 21 to be pulled shut, then its self-closer was not working?

22 A. It didn't specifically occur to me at the time, but in
 23 the context that this was an empty property, so it was
 24 going to be refurbished, and part of the void standard
 25 was to check the door-closer, so my assumption would

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1 have been that any work required to the door would be
 2 done as part of void works.

3 Q. Right.

4 A. So at this stage I'd understood the complaint was
 5 about — it had been left open and potentially
 6 vulnerable to antisocial behaviour. The short-term
 7 solution of that was to close the door, which is what
 8 Rydon did, and then my assumption would be that the
 9 door-closer and any other issues would be repaired —
 10 would be dealt with as part of the void works.

11 Q. Nonetheless, did it not indicate to you that this was
 12 a flat which had a front door which wasn't a fully
 13 operating self-closing door?

14 A. I mean, that — in hindsight, yes, but —

15 Q. Right.

16 A. — that — we don't know the cause of that door-closer
 17 being not working or disabled, and my assumption was
 18 that it would be repaired as part of the void works.

19 Q. That was your assumption, was it?

20 A. Yes.

21 Q. Did you take it up with anybody? Did you go to
 22 Janice Wray and say urgently, "We have a flat door with
 23 a closer that's broken and it needs to be sort out"?

24 A. It would've been dealt with as part of the voids works.

25 Q. You say it would have been; do you yourself know that it

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1 was?
 2 A. That wasn't my area of responsibility.
 3 Q. Did you take this to somebody else? Did you take this
 4 problem to the people doing the voids work, copied to
 5 Janice Wray, and say, "Here is a flat front door which
 6 is not compliant with the fire safety strategy?"
 7 A. No, I didn't. I knew that it was covered in the fire
 8 safety strategy that doors — door-closers would be
 9 addressed as part of void works.
 10 Q. Now, I asked you some questions last week about the
 11 report into health and safety prepared by Matt Hodgson
 12 in 2013 for the TMO. Do you remember that exchange?
 13 A. Yes.
 14 Q. We will look, please, at {TMO10003124}. That's the
 15 report itself. I'll just put it back in front of you to
 16 refresh your recollection. There it is.
 17 This was discussed, wasn't it, at an executive team
 18 meeting in August 2013? Do you remember that?
 19 A. I don't remember it specifically.
 20 Q. It's the following month. Let's look at the minutes of
 21 it. It's {TMO00899807}. You were not at this meeting,
 22 which is why you probably don't remember it being
 23 discussed at it, but I want to ask you something about
 24 it.
 25 If you go to the foot of the page, you will see the

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1 topic, point 1.4, "Health and safety report". Do you
 2 see that?
 3 A. Yes.
 4 Q. It says:
 5 "Although there was a lot of operational action in
 6 the report, it did not help us with the organisational
 7 structure/management."
 8 Then it says this:
 9 "Peter Maddison was concerned that the fire risk
 10 assessments were sub—standard, and could put the
 11 organisation at risk. There was also some concern that
 12 high risk blocks were being classified as low risk, and
 13 vice versa. However, the Fire Brigade had approved our
 14 processes, but there was concern that A&R [that's assets
 15 and regeneration, of course] were being bogged down with
 16 actions which were not addressing the situation. It was
 17 agreed to set up a meeting with Matt Hodgson,
 18 Peter Maddison and Janice Wray to discuss the way
 19 forward. Peter had suggested that he take on
 20 responsibility for all areas including asbestos and fire
 21 risk which were still with Janice Wray, and Janice Wray
 22 would have a more strategic role, and work with the
 23 Fire Brigade. The possibility of Adrian Bowman
 24 transferring to A&R to be considered so that
 25 Peter Maddison could resource this area of work.

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1 Governance would be the reorganised Health & Safety
 2 Committee, and also the A&R health & safety group which
 3 Sacha Jevans would review, and chair herself.
 4 Matt Hodgson's report to reflect this structure. Any
 5 actions from the A&R group to be referred to the Health
 6 & Safety Committee or Executive Team."
 7 Then you see the action people are SJ and AP.
 8 Now, you weren't at the meeting, as we've seen, but
 9 do you remember making the executive team aware of the
 10 concerns about the FRAs that you see reflected in this
 11 minute?
 12 A. Yes. I mean, I think it was the — they were some of
 13 the concerns that we discussed last week relating to the
 14 processes and, yeah, so I think they're quite
 15 consistent.
 16 Q. Why did you say that the FRAs were substandard?
 17 A. They aren't my words. These are clearly third—party
 18 words, so —
 19 Q. All right. They are third—party words, but they clearly
 20 reflect something that the people who wrote the note or
 21 were at the meeting understood from you.
 22 Were you concerned at the time that the fire risk
 23 assessments were substandard?
 24 A. I was concerned that some of the actions weren't easy to
 25 interpret, so they were actions to go and investigate

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1 rather than actions to go and do, and I wanted them to
 2 be more precise so we could streamline that process of
 3 allocating the works to contractors and getting the
 4 actions dealt with in the quickest way possible.
 5 Q. Did you express the view that the fire risk assessments
 6 could put the TMO at risk?
 7 A. I don't think I — I don't think that was — they were
 8 my words, but I think it's true, if the fire risk
 9 assessments weren't being managed effectively they would
 10 create a risk.
 11 Q. Do you know whether your concerns as expressed here were
 12 addressed?
 13 A. Well, the proposal to make the changes to the team that
 14 were suggested here weren't put in place.
 15 Q. No.
 16 A. So —
 17 Q. So what happened?
 18 A. They were clearly considered by Sacha and
 19 Anthony Parkes, and my understanding was that there was
 20 a decision made that they wanted there to be separation
 21 between the delivery teams and the health and safety
 22 teams and that was — that structure was maintained.
 23 Q. Right. So the upshot of this was that this didn't
 24 happen?
 25 A. It didn't happen.

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1 Q. No, as I think was clear from last week. But you
 2 nonetheless did express, according to this note,
 3 concerns that the fire risk assessments were
 4 substandard.
 5 Such as you had them, were you ever satisfied that
 6 the concerns as had been reflected here were addressed
 7 in any way?
 8 A. I think a lot of progress was made in improving the
 9 situation. It was always something that needed to be
 10 improved and it did. Some of the documents and the
 11 figures that we looked at last week showed that there
 12 was a significantly improving situation.
 13 Q. Right. So you say this wasn't taken on by your
 14 department?
 15 A. Not by my department, by the executive.
 16 Q. Right.
 17 A. So —
 18 Q. Can we go to {TMO00849798}. Now, this is a minute of
 19 the executive team, 18 September 2013, and we can see
 20 that you in fact are not present or in attendance, but
 21 you do actually appear at it to address the meeting on
 22 A&R matters.
 23 If we go to item 2, please, on page 2
 24 {TMO00849798/2}, it says:
 25 "Peter Maddison attended for this item, and made

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1 a presentation. An overview was given on the work that
 2 was required, health and safety compliance, and the
 3 project plan for each area."
 4 Do you see that?
 5 A. Yes.
 6 Q. If we then turn to page 6 {TMO00849798/6}, please, it
 7 continues. This is all under your presentation, and on
 8 page 6 at the top of the page, the last bullet point
 9 down, it says:
 10 "Clienting of fire risk assessments had been taken
 11 over by A&R, which were due to be completed by
 12 mid October."
 13 I've assumed that it was you who presented that
 14 item; is that right?
 15 A. Well, that's not correct, no. I didn't minute this.
 16 Q. No, I know you didn't minute it, Mr Maddison, I'm just
 17 wondering whether it's right that it accurately records
 18 this as part of the presentation you gave —
 19 A. No.
 20 Q. — that starts on page 2.
 21 A. No, we had no role in clienting the fire risk
 22 assessments.
 23 Q. Well, looking, then, at page 5 {TMO00849798/5}, you can
 24 see that this bullet point I'm putting to you falls
 25 under the heading "Timescale for compliance", do you

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1 see?
 2 A. Yes.
 3 Q. And "Fire risk" is the second of those topics,
 4 "Q1 2014". Yes?
 5 A. Yes.
 6 Q. You can see in the bullet points below that, second
 7 bullet point down, it says:
 8 "However, we could be at risk if something went
 9 wrong i.e. at Grenfell Tower we had carried out a fire
 10 risk assessment, but one year later, another inspection
 11 discovered that none of the actions had been carried
 12 out. Unfortunately this information had been conveyed
 13 to the Grenfell Tower action group."
 14 Are you sure this isn't something that you presented
 15 on?
 16 A. None of those are my words.
 17 Q. Do you know whose they are?
 18 A. The person who minuted the meeting, I assume.
 19 Q. Well, let's go back to the attendees at the top of
 20 page 1 {TMO00849798/1}, please. Present are
 21 Robert Black, Yvonne Birch, Sacha Jevans and
 22 Anthony Parkes, with Angela Bosnjak—Szekeres and
 23 Jane Clifton in attendance.
 24 A. Jane Clifton would have taken the minutes, but they're
 25 not correct.

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1 Q. Can you tell us who it was addressing the meeting on
 2 those matters if it wasn't you?
 3 A. I could have been presented to the meeting or Sacha may
 4 have been presenting something that I had prepared for
 5 her, but those minutes are inaccurate. I mean, because
 6 I would only go to an executive team meeting for
 7 a discrete item, I wouldn't have the opportunity to
 8 correct any minutes, so I wouldn't have seen the
 9 minutes.
 10 Q. Right.
 11 Can you help us understand what it means when it
 12 says, "Clienting of fire risk assessments had been taken
 13 over by A&R"?
 14 A. I can't, because it doesn't make any sense, because it
 15 didn't happen.
 16 Q. Okay.
 17 Just give me one moment, there's something I just
 18 need to check.
 19 (Pause)
 20 General question: did you ever consider providing
 21 the fire risk assessment reports to Grenfell Tower
 22 residents when responding to their complaints about
 23 fire safety?
 24 A. Which complaints about fire safety are you referring to?
 25 Q. Any.

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1 A. If it had been relevant. I mean, not many of the
2 complaints were specifically about fire safety. The —
3 in fact, I'm struggling to think of which ones were
4 about fire safety.
5 Q. Well, the AOV, the floor numbering, the gas risers.
6 We've been through them today.
7 A. So none of them would have been ... what we did in each
8 of those instances is got a report from the fire risk
9 assessor rather — which was a more bespoke response on
10 that issue from an expert, rather than giving a broader,
11 more dense document such as a fire risk assessment. So
12 I think we did listen and communicated to residents,
13 precisely — so did similar things with the — in the
14 dialogue with David Collins in relation to the location
15 of the HIUs, and I got several reports to address his
16 concerns, responding to fire safety issues.
17 So I — no, we didn't, I didn't specifically give
18 the fire risk assessment, although we did — the 2012
19 one was communicated to Mr O'Connor.
20 Q. It was.
21 A. But what we did is we procured more precise legal —
22 sorry, technical reports from our fire risk assessor to
23 respond specifically to those questions.
24 Q. Yes, thank you very much.
25 Mr Maddison, I only have one more question for you,

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1 and it's the question that I think I asked you at the
2 end of Module 1 in relation to those matters. But
3 looking at all the matters we've covered during the
4 course of your Module 3 evidence over the last what is
5 now two and a half days, is there anything, looking back
6 on it now, that you would have done differently?
7 A. I've tried to be as candid as I can over quite
8 an extensive dialogue over the last couple of days and,
9 I mean, my answer is that I would have done anything and
10 everything possible to have avoided this tragedy, and
11 I really think about it every day. That's all.
12 MR MILLETT: Well, Mr Maddison, it remains only for me to
13 thank you very much for coming to the Inquiry and
14 assisting us with our Module 3 questions, so thank you
15 very much indeed for doing that.
16 THE WITNESS: Thank you.
17 MR MILLETT: Thank you.
18 SIR MARTIN MOORE—BICK: Mr Maddison, it's right that
19 I should thank you on behalf of all of us on the panel
20 for coming here for a second time to give your evidence.
21 I know it has taken rather longer than you were
22 originally led to expect, I'm sorry about that, but
23 there is a lot of material to cover, and we're very
24 grateful to you for giving so much of your time. It's
25 been very helpful to hear from you.

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1 THE WITNESS: Thank you.
2 SIR MARTIN MOORE—BICK: Thank you very much indeed.
3 (The witness withdrew)
4 SIR MARTIN MOORE—BICK: Thank you, Mr Millett. Well, that's
5 it for today, I think, isn't it?
6 MR MILLETT: That's it for today, and tomorrow we have
7 Ms Grange, who will be asking the expert, Mr Sakula,
8 some questions on the subject of cladding.
9 SIR MARTIN MOORE—BICK: Good. Thank you very much.
10 Well, we'll do that at 10 o'clock tomorrow, then,
11 please. Good, thank you.
12 (3.50 pm)
13 (The hearing adjourned until 10 am
14 on Wednesday, 5 May 2021)
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