



Grenfell Tower Inquiry

Day 144

June 15, 2021

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Tuesday, 15 June 2021

(10.00 am)

SIR MARTIN MOORE—BICK: Good morning, everyone. Welcome to today's hearing. Today we're going to hear further evidence from Ms Janice Wray. So would you ask Ms Wray to come back in, please. Thank you.

MS JANICE WRAY (continued)

SIR MARTIN MOORE—BICK: Good morning, Ms Wray.

THE WITNESS: Good morning.

SIR MARTIN MOORE—BICK: I hope you're ready to continue?

THE WITNESS: Yes.

SIR MARTIN MOORE—BICK: Good, thank you very much.

Yes, Mr Millett, when you're ready.

Questions from COUNSEL TO THE INQUIRY (continued)

MR MILLETT: Good morning, Mr Chairman. Good morning, members of the panel.

Ms Wray, good morning, to you.

A. Good morning.

Q. I am going to start with a new topic this morning, the AOV system, and, within that topic, start in turn with the system as it existed before the refurbishment and, within that, the fire at Grenfell Tower in 2010.

Can I ask you, please, to go to your first witness statement at page 43 {TMO00000890/43}. Please go to paragraph 195 under the heading "Grenfell Tower fire in

1

2010":

"In April 2010, a fire broke out at Grenfell Tower as a result of someone setting fire to recycling/rubbish which had been left in a lift lobby for collection. The LFB attended and extinguished this fire and nobody was injured."

Then at paragraph 202, if you go to page 44 {TMO00000890/44}, you pick up the theme, and you say there ...

SIR MARTIN MOORE—BICK: Mr Millett, I'm sorry, I'm going to interrupt you for a moment. My transcript is endlessly recycling, and I wonder whether other people are suffering from the same defect. My colleagues are.

MR MILLETT: Yes, mine is as well.

SIR MARTIN MOORE—BICK: Ah, now it's stopped, but not on today's.

MR MILLETT: I keep rolling down Day 144 in draft, which is not —

SIR MARTIN MOORE—BICK: I thought I had solved it by connecting again to realtime, but actually it's simply scrolling, and I think anyone who is trying to make use of the transcript elsewhere will find this impossible.

MR MILLETT: I agree. Perhaps we should have a brief pause while we sort it out.

SIR MARTIN MOORE—BICK: I think it would be better.

2

I'm sorry, Ms Wray, we're going to stop as soon as we started, almost, but I think we need to get the technology sorted out before we carry on. We will call you back as soon as we can.

THE WITNESS: Okay.

SIR MARTIN MOORE—BICK: Right, thank you so much.

(Pause)

Well, having said that, I can only speak for my transcript, but it seems to have solved the problem.

MR MILLETT: Shall we just take a minute to make absolutely sure, or shall we continue, Mr Chairman?

SIR MARTIN MOORE—BICK: Let me just check that my colleagues' are working.

Can I ask you check with the counsel sitting behind you whether theirs are all working?

MR MILLETT: We're all working. I think the remoter access may not be working.

(Pause)

SIR MARTIN MOORE—BICK: We'll rise for a couple of minutes to see if we can get this sorted out.

MR MILLETT: Thank you very much.

(10.05 am)

(A short break)

(10.15 am)

SIR MARTIN MOORE—BICK: Welcome back, everyone.

3

I understand that the technical problem has been solved, and we're ready to continue with Ms Wray's evidence.

So would you ask Ms Wray to come back in, please.

(Pause)

Ms Wray, I'm sorry for the interruption, but

I gather that the technical problem has been solved and we're ready to continue.

THE WITNESS: Okay, thank you.

SIR MARTIN MOORE—BICK: Yes, Mr Millett.

MR MILLETT: Mr Chairman, thank you.

Ms Wray, can I now ask you to be shown page 45 of your first witness statement {TMO00000890/45}, paragraph 202. This is the subject of the 2010 fire at Grenfell Tower, and you say:

"We did investigate this fire internally and the information collated was sent to Collette O'Hara of the LFB. We then provided Mr Awoderu with the information we had on the fire in a letter from our Project Manager, Paul Dunkerton, in response to his email in November 2012 ..."

And you exhibit that.

If we go to your third witness statement, please, {TMO00847305/36}, let's pick it up at paragraph 120. You say there that, in summary, in 2010 you collated information about the fire in an email you sent to

4

1 Collette O'Hara on 5 May 2010.
 2 Let's look at that. That's at {TMO10048221/4}.
 3 This is the email, and you can see it's 5 May 2010,
 4 to Collette O'Hara, copied to, among others,
 5 Robert Black, Lornette Pemberton and Sacha Jevans,
 6 subject "Fire at Grenfell Tower – Friday 30th April":
 7 "Collette
 8 "Further to our telephone conversations yesterday
 9 about this fire I would advise as follows ..."
 10 Then you can see, if you just scroll down a number
 11 of paragraphs which go over the page, was this
 12 effectively your written report to the LFB concerning
 13 that fire?
 14 A. Yes, it was.
 15 Q. If we go to the second paragraph marked 2 on page 1, you
 16 see that it says:
 17 "The communal fire detection system is linked to an
 18 extraction system and this did operate removing the
 19 smoke from the lift lobby. Unfortunately, it appears
 20 that there was spillage/leakage of smoke from the
 21 extraction system into the lobbies of floors 7, 12, 13,
 22 15, 17, 18, 19 and 20 and this led a number of residents
 23 to believe that their lift lobby was smoke logged and
 24 they were trapped in their home and as such they
 25 telephoned the FB raising their concern."

5

1 Did you share that information with Carl Stokes?
 2 A. I'm actually not sure that I did. I find it hard to
 3 believe that I wouldn't have, but I don't think I can
 4 give you a definite answer.
 5 At that stage, I think we'd just completed the
 6 high-risk programme and we were about to tender for the
 7 medium-risk, so I don't think we actually had
 8 an assessor engaged at that time. I would have thought
 9 that when I appointed him I would have given him copies
 10 of correspondence — all relevant correspondence, any
 11 deficiency notices, et cetera, but I can't be absolutely
 12 sure that I did.
 13 Q. Well, Mr Stokes is pretty sure that you didn't. His
 14 evidence on {Day139/6–7} was that he was aware that
 15 there was an arson incident in July 2010 caused by bags
 16 of rubbish being left outside a flat door, but didn't
 17 know about smoke spillage or leakage of smoke from the
 18 AOV on the lobbies of the floors you record in your
 19 email to Collette O'Hara here. Can you account for
 20 that?
 21 A. No, and I would have thought the fact that he knows that
 22 detail, it seems unlikely that he wouldn't have known
 23 all of this. There was no reason not to share it. If
 24 I didn't share it, it was definitely an oversight, but
 25 I just can't remember at this stage.

6

1 Q. We don't have a record of you sharing it. Can we
 2 assume, given your propensity to share things by email,
 3 that you would have sent him an email had you shared it
 4 with him?
 5 A. It's likely I would have, yes.
 6 Q. Can we go back to page 44 of your first witness
 7 statement {TMO00000890/44}, please, paragraph 201. We
 8 were on paragraph 202; I just want to look at 201, the
 9 previous paragraph.
 10 You say at page 44, paragraph 201, foot of the page,
 11 halfway through the paragraph:
 12 "My understanding is that we never received such
 13 a report from the LFB and one does not exist. I am
 14 aware that it is possible to request a fire
 15 investigation report from the LFB following an incident
 16 however these reports are often delayed and provide
 17 limited information due to them being standard format
 18 and heavily redacted. I have learnt through experience
 19 that more comprehensive information can generally be
 20 obtained through email requests to the relevant LFB
 21 Station manager."
 22 Now, can we look then, in light of that evidence, to
 23 a report. This is {IWS00001463}.
 24 It's headed:
 25 "Report of attendance of London Fire Brigade to

7

1 a primary fire incident.
 2 "Date of report: 22 December 2010."
 3 A. Yeah.
 4 Q. You can see, if you look down your screen, that the fire
 5 ground was North Ken, and the address was
 6 Grenfell Tower, "Building name/Number: Grenfell Tower".
 7 You see that —
 8 A. Yes.
 9 Q. — towards the bottom of your screen.
 10 Do you recognise this document?
 11 A. No. I think I became aware in preparing to come to give
 12 evidence that this existed, but I don't think I've ever
 13 received a copy, and that may be because I didn't apply
 14 for one. It most likely is that I omitted to apply for
 15 one, because we'd had such extended discussions with the
 16 Fire Brigade and with the local staff —
 17 Q. I see. So can we take it from that the LFB did not
 18 provide you with a copy because you didn't ask for it?
 19 A. That's likely to be the answer, yes.
 20 Q. You didn't ask for it, so that we're clear, because you
 21 had had a lot of discussions with the LFB?
 22 A. Yes, and we'd met them on site on at least one occasion
 23 subsequently, the operational crews and the fire safety
 24 team. So I didn't think — I thought I had been told
 25 everything that could be disclosed, but that was an

8

1 error on my part.
 2 Q. Right. But you knew, I think, didn't you, that the LFB
 3 would produce a formal document such as this in relation
 4 to a primary fire incident?
 5 A. Yes, and I have ordered them on a number of occasions,
 6 so this was just an oversight.
 7 Q. I see. I was going to ask you that, because clearly it
 8 was important to you to have a written record, a formal
 9 record, from the LFB of a fire such as this.
 10 A. Indeed.
 11 Q. Presumably it was also necessary for Carl Stokes to have
 12 all the information about previous fires in this
 13 building in order for him to perform his fire risk
 14 assessment?
 15 A. Yes.
 16 Q. Do you agree?
 17 A. And, as I say, I can't give an explanation for why
 18 I didn't provide that to him. I would have happily
 19 done, but it seems —
 20 Q. Do you accept you should have done?
 21 A. Yes, absolutely.
 22 Q. Okay.
 23 Now, if we look at page 3 {IWS00001463/3}, there is
 24 a point here. If you look down page 3 you can see,
 25 about halfway down your screen, there is a question:

9

1 "Were active fire fighting systems present: Yes.
 2 "Type of active system: Smoke ventilation.
 3 "Location of system in relation to the fire: On same
 4 floor as fire.
 5 "Did the system operate?: No."
 6 Then underneath the words in brackets:
 7 "Impact of the system on the fire: Did not
 8 contain/control.
 9 "Reason the system did not function as intended:
 10 Fault in system."
 11 Was that not an important piece of information for
 12 you to know, or at least for you to know that the
 13 Fire Brigade knew and had recorded?
 14 A. Yes, but I think in reference to the email that I'd sent
 15 to Collette O'Hara, we'd been very clear about the
 16 floors that it failed and provided the detail that our
 17 building services manager was able to give. So we were
 18 already aware of this.
 19 Q. Similarly, that piece of information, the fact that the
 20 LFB had recorded it in a report such as this, to be
 21 passed on to Carl Stokes?
 22 A. Yes.
 23 Q. Yes.
 24 Now, in your statement you refer to Tunde Awoderu
 25 requesting a copy of the LFB report in 2012. Did you

10

1 ask the LFB for a report on that occasion?
 2 A. Well, I mustn't have done.
 3 Q. Why is that?
 4 A. I can't give you an explanation at this point.
 5 I regularly requested these. I can only think that, as
 6 I said already, we'd had such detailed and protracted
 7 discussions with the Fire Brigade and with the local
 8 on-site staff, the fire safety team and the operational
 9 crews, I think I must have wrongly, as it turns out,
 10 assumed that I already had comprehensive information
 11 from the people who attended who are feeding into this
 12 report. I thought I had it all at my disposal.
 13 Q. Well, you may have done, but, you see, Mr Awoderu was
 14 after something like this. Why not just ask for it and
 15 give it to him, rather than relying on a stock of
 16 information held piecemeal by you in your records?
 17 A. I can't give you any other explanation other than what
 18 I've said, apologies. I should have done this and
 19 I didn't.
 20 Q. Was not the fact that Mr Awoderu, who was a resident of
 21 this building, important in your thinking here?
 22 A. Well, yes, and I gave him as much information as
 23 I reasonably had to hand and could provide. I wasn't
 24 saying, "No, you can't have any", I was trying to
 25 accommodate his request. But, as we've established,

11

1 I must have not ordered a copy of this report, so
 2 I couldn't give him that, but I gave him everything that
 3 I could.
 4 Q. Did you tell him that the AOV was faulty?
 5 A. I ... sorry, without looking at the letter that we sent
 6 him, I can't tell you, sorry. I'd have to look back at
 7 the letter. I thought that we had. I thought that we'd
 8 been clear that there were faults on the system. What
 9 I was advised was that we were aware of those, the works
 10 had been ordered; unfortunately there had been a delay
 11 in the parts being available, which had caused a few
 12 days' delay, and my building services manager was
 13 chasing the contractors to get it done a few days after
 14 the fire, and then was also going to do a smoke test.
 15 In conjunction with the discussion with the
 16 Fire Brigade, it was agreed that that was what was
 17 important. So we were trying to address the concerns
 18 and the issues.
 19 Q. Right. Well, we will how this eventuates.
 20 Can we stick with this document and go to page 5
 21 {IWS00001463/5}, please. You will see in the
 22 pre-penultimate entry:
 23 "Number of persons injured (including those both
 24 injured and rescued): 3."
 25 Do you see that?

12

1 A. Yes.
 2 Q. Do you agree that three people were injured in that
 3 fire?
 4 A. That's what it says here, yes.
 5 Q. Your report by email of 5 May 2010 that we looked at to
 6 Collette O'Hara doesn't mention anyone being injured.
 7 Can you explain why that is?
 8 A. No, other than, as I've said, we had protracted
 9 discussions with the operational crews who attended, and
 10 at no point did they ever tell me that anybody was
 11 injured. My estate staff, who are based on the estate,
 12 the housing management team, had talked to lots of the
 13 residents and had fed back, and all of that information
 14 was put into my email to Collette O'Hara. So at no
 15 point was anybody telling me there were any injuries,
 16 and I — which is bizarre, because it would have been
 17 the operational crew who fed into this document, but
 18 that wasn't brought to my attention.
 19 Q. It wasn't brought to your attention because you didn't
 20 ask for the document.
 21 A. No, but the point I'm making is that the operational
 22 crews — the information in this document comes from the
 23 operational crews who attend the fire, and we were
 24 talking to them and to their team leader at length
 25 on site about the details of the fire and we got a lot

13

1 of information about the fire, but at no point did it
 2 include the number of injuries.
 3 Q. You see, it would have been useful to have this document
 4 because the LFB's records show that three people were
 5 injured.
 6 A. I can see that, yes.
 7 Q. Carl Stokes told us that he hadn't seen this document
 8 and, as a result, he wasn't aware that three people were
 9 injured in that fire. That's {Day139/7:14–23}. Clearly
 10 that must be right.
 11 A. It must be right because I wasn't aware and I couldn't
 12 have told him.
 13 Q. Now, can we look, then, at {TMO10048221}. This is your
 14 email report to Collette O'Hara, paragraph 2 again, just
 15 back to that.
 16 Sorry, this is a different document.
 17 A. Different email, yeah.
 18 Q. Yes, sorry. I'd like to go back to the email we were on
 19 to Collette O'Hara, which is at page 4 of this email run
 20 {TMO10048221/4}, I'm so sorry. It's the same document,
 21 I've given you the wrong reference. It's page 4.
 22 If we go back to that, paragraph 2 — I've read this
 23 to you before — you tell her about the smoke—logging.
 24 It looks — is this right? — that the AOV system
 25 simply cleared the relevant lift lobby, only to

14

1 circulate the smoke back into other lift lobbies on
 2 eight other floors?
 3 A. What I was advised is there was a problem with the
 4 sealing around the edges of the extraction vents on
 5 these floors, and so it allowed a degree of smoke —
 6 I've no idea how much, I assumed it was not
 7 a significant amount — to leak on to those floors. So
 8 instead of extracting it from the building, it was
 9 allowing some spilling at those points.
 10 Q. Well, on its face, it says in terms, doesn't it, that
 11 the system cleared the relevant lift lobby but, in turn,
 12 circulated smoke — some smoke, at least — back into
 13 other lift lobbies, in total eight?
 14 A. Yes, that's what I said, sorry.
 15 Q. My question arising out of that basic observation is:
 16 was that not a sign to you of a serious malfunction in
 17 this system?
 18 A. Clearly, yes, there's a problem in the system, and I'm
 19 asking the building services team, who manage the
 20 contractors and maintain the system, what on earth went
 21 wrong and what — how did this happen and how is it
 22 being addressed, and I also tried to reflect that in the
 23 email.
 24 Q. Did that not also present a suggestion to you that
 25 interim measures were needed?

15

1 A. I don't know if it's on this email, but yes, and that's
 2 what our then building services manager, Keith Fifield,
 3 I took him to task about the fact that the system — he
 4 knew the system was problematic and there had been
 5 a delay in getting the remedial works done, and he
 6 should have at least as a minimum advised the
 7 Fire Brigade, but interim measures should have been
 8 considered, and I'm sure that I've read the email
 9 correspondence on that, so I think there is evidence to
 10 that effect.
 11 Q. We'll come on to look at this right now.
 12 If you go to paragraph 3 of this very email, which
 13 starts:
 14 "The smoke extraction system is maintained under our
 15 fire safety planned preventative maintenance contract
 16 with RGE Services."
 17 Four lines up from the bottom of page 4, you say:
 18 "As discussed, in retrospect the delay should have
 19 caused us to consider what, if any, interim measures
 20 were required until repairs were completed and the
 21 system was fully operational again. I have spoken to
 22 the TMO Senior Engineer and advised that I believe, as a
 23 minimum, we should have advised the local Area Housing
 24 Team and the local Fire Station Manager of the defect
 25 and kept them apprised of progress and completion

16

1 target for remedial works etc."

2 So that's what you say about interim measures.

3 Let's just pursue it a bit further in the same email

4 run.

5 If we go to page 2 {TMO10048221/2}, we see that

6 Spencer Sutcliffe, who was team leader for Kensington and

7 Chelsea fire safety, responds to your email, to you and

8 to Collette O'Hara, on 6 May, the next day, and the

9 email is there:

10 "Dear Janice,

11 "Thank you for your response regarding the Fire

12 Safety failings at Grenfell Tower."

13 If we go to the third paragraph down, he says this:

14 "I appreciate your comments regarding the admission

15 of interim measures and endorse your future recommended

16 actions. I recommend that there is an assessment made

17 for each individual Fire Safety maintenance issue to

18 ensure that higher priority areas are dealt with to

19 a strict time-scale."

20 Did you introduce a procedure to assess each

21 fire safety maintenance issue and prioritise higher

22 priority areas?

23 A. I didn't, but this would have gone to Keith Fifield, who

24 managed the contractors, and he would have been required

25 to speak to his contractors and agree exactly that,

17

1 identify which repairs, which remedial works, needed to

2 be done in which timescale. It should have already been

3 covered in the contract, so he should have been

4 reviewing his contract.

5 Q. No doubt, but I'm asking you a slightly different

6 question: did the TMO introduce a procedure to assess

7 the high-priority areas in the way that Mr Sutcliffe is

8 recommending?

9 A. Not holistically, no.

10 Q. At all?

11 A. Well, we are ... okay.

12 We always looked at priorities, repairs on its own,

13 but also remedial works in terms of contracts. They

14 were always very specific, emergency, urgent, different

15 timeframes for different kinds of repairs, so it was

16 being reassessed on a regular basis. Certainly whenever

17 the planned preventative maintenance contracts were

18 being re-tendered and re-procured, I'm confident that it

19 was included at that stage in relation to those specific

20 pieces of kit. But, as I say, that wasn't — that would

21 have been managed by the contracts management team. But

22 I certainly know responsive repairs were always very

23 specific. Some were a four-hour response, some were

24 24 hours, so it depended. They were always being

25 reviewed to make sure that we had the right repairs in

18

1 the right category.

2 Q. But was a procedure for interim measures introduced

3 pending repairs of any fire safety mechanism?

4 A. I think it's actually in our — eventually went into our

5 policy that —

6 Q. It did, in November 2013. This is spring 2010.

7 A. Yes, I appreciate that. My point is that at this point,

8 I was — spoke at length to the building services

9 manager, and then we had health and safety asset — the

10 equivalent of their sort of operations group, and it's

11 the kind of thing that I was continually reiterating.

12 Because I didn't always know when there were defects.

13 In advance of this fire, I wouldn't have been aware that

14 there were faults on the system, so — but Keith also

15 knew that there should have been interim measures.

16 To be fair, there had been a delay in the works

17 being carried out which he hadn't anticipated which may

18 have impacted on him not putting something in place, but

19 it brought it very heavily into the spotlight and there

20 was quite significant discussion about it.

21 Q. Let's see how it goes.

22 If we go to the next page, page 3 {TMO10048221/3},

23 at the top, Spencer Sutcliffe says:

24 "■ After liaising with our Fire Engineering

25 department, it is surprising that if all systems are in

19

1 place, defective seals would cause this level of smoke

2 seepage.

3 "■ Consideration should be given to the entire

4 system. E.g.: Did any other floor vents open, did the

5 top vent open correctly, is there sufficient draw in the

6 first place to enable smoke to travel vertically.

7 "■ Due to the catastrophic failure of the system,

8 I would suggest that it would be very difficult to

9 demonstrate compliance without a full Engineers smoke

10 test."

11 Now, did Spencer Sutcliffe's comments there that I've

12 just read to you cause any concern about the state of

13 the AOV at the time?

14 A. Well, yes, they're really quite — extremely critical,

15 aren't they?

16 Q. Yes. If you go to page 1 {TMO10048221/1}, we can see

17 your response:

18 "Thank you for your e-mail. I referred most of your

19 queries to my Senior Electrical Engineer and he has

20 responded as follows ..."

21 And there is a response there in quotations in four

22 paragraphs.

23 A. Yes.

24 Q. He denies the fact, as you can see in the third

25 paragraph, that there was a catastrophic failure. Then

20

1 in the last—but—one paragraph, he says:
 2 "I can confirm that the works to the vents were
 3 completed on schedule last Friday and that a successful
 4 smoke test has also been undertaken. However, my
 5 colleague has asked for this to be repeated whilst he is
 6 in attendance and this is currently being arranged."

7 That's your email to him.

8 Now, if we go to {RBK00013637}, this is a report
 9 also dated 12 May 2010, so the very same day as your
 10 response, and it's a maintenance report produced by
 11 RGE Services for the smoke vent system at
 12 Grenfell Tower.

13 Have you seen that document before now?

14 A. I don't think so, no.

15 Q. Right, okay, so you haven't seen it before. Let's look
 16 at page 7 {RBK00013637/7} and see how we do.

17 Can we go to page 7, please, and look at "Comments &
 18 recommendations" under section 4 of this report. It
 19 says there:

20 "We found that the inlet dampers could not be reset
 21 with our new reset tool because the leverage required to
 22 reset was so great that to achieve this the fascia
 23 grilles had to be removed.

24 "The solution to this is to replace the spring
 25 actuators with electrically operated linear actuators

21

1 which will allow the dampers to motor open in a fire and
 2 them[sic] motor closed when the system is reset.

3 "Due to the spring force on the inlet dampers the
 4 actuators are not reliable and may not operate on every
 5 activation.

6 "The outlet damper have very little force and are
 7 reliable.

8 "Apart for the above, and its age, the system is
 9 generally in good operational order and is capable of
 10 being maintained for the next 5 years apart from the
 11 inlet dampers [in bold]."

12 Do you see that?

13 A. Yes.

14 Q. Were you aware that RGE had concluded that the AOV may
 15 not operate on every activation before you wrote to the
 16 LFB the same day?

17 A. No, I've never been aware of this, otherwise I would
 18 never have written that email. I was given the
 19 information by the team who managed the contractor, and
 20 my emails and my correspondence with the Fire Brigade
 21 were based on what they were advising me.

22 Q. Well, can you account for how it came about that you
 23 didn't see this report and wrote to the LFB in ignorance
 24 of it?

25 A. No, other than it wasn't provided and I took it on good

22

1 faith.

2 Q. But just explain to us how the system worked within the
 3 TMO, that a report such as this could not have made its
 4 way to you.

5 A. Because there's — in those days it was building
 6 services and subsequently contract management. There's
 7 a whole team within the technical division which is
 8 exclusive dealing with planned preventative maintenance
 9 of all sorts of pieces of kit, whether it be electrical,
 10 gas, water quality, fire safety. All of those issues
 11 usually have had a dedicated contract manager for each
 12 different aspect. They procure the services, manage the
 13 contractor, monitor their performance, instruct them,
 14 and I would meet with the head of on a regular basis to
 15 get feedback, get a bit of an oversight of what's
 16 happening.

17 I can't be looking at — I mean, I don't have access
 18 to, but I can't be looking at the service reports. We
 19 have people whose sole job is to do that. So I'm
 20 taking —

21 Q. But —

22 A. Sorry, just to reiterate: so I'm taking the information
 23 I'm given by their manager who controls that team on
 24 good faith, which is what I'm kind of — seems
 25 reasonable to do.

23

1 Q. So you would have expected the senior electrical
 2 engineer who reported to you —

3 A. Yeah.

4 Q. — and which you reported in turn to the LFB to have
 5 told you about this report?

6 A. Well, yes, he knew this was really crucial and we needed
 7 to address it because it was obviously a weakness in the
 8 system on the day of that fire. I wasn't, before that,
 9 aware that there was an outstanding repair, so I was
 10 chasing him on a regular basis and I was passing on his
 11 comments. As you saw from the email to
 12 Spencer Sutcliffe, I was directly quoting what his
 13 response was. That wasn't my words, those were his.

14 Q. No, indeed. But you went on to say you could confirm
 15 the works to the vents were completed on the schedule
 16 last Friday; were you not interested to see a report
 17 from the people who had done the work so that you could
 18 satisfy yourself, even if just by a quick spot check or
 19 a read, that what had been done had been done properly
 20 so as to address the LFB's concerns?

21 A. Looking at this now, then clearly I should have done
 22 that. I can only reiterate that I took it on good
 23 faith, and we'd had protracted discussions and I was
 24 very clear about the approach that I believed they were
 25 taking, so at no point did I question further than that

24

1 what they were telling me.
 2 Q. Now, can we go to {TMO00894311}, please.
 3 This is a further report, maintenance report, for
 4 Grenfell Tower, produced by RGE Services Limited, dated
 5 9 August 2011. So that's a year on. You can see the
 6 date there.
 7 First of all, I should ask you: have you ever seen
 8 this document before?
 9 A. No.
 10 Q. Again, no.
 11 A. No.
 12 Q. Right. Again, let's see how we go with it.
 13 If you go to page 5 {TMO00894311/5}, we can see that
 14 section 3 says this:
 15 "Test result/urgent recommendation.
 16 "We have now been maintaining this system for over
 17 12 months and can no longer guarantee that the system
 18 will operate as required or that it meets fire
 19 regulation.
 20 "The issues are:—
 21 "1 Lobby Vents systems actuation are no longer
 22 reliable.
 23 "2 Lobby Vents can and have been found to open
 24 between visits.
 25 "On every occasion we have found that random lobby

25

1 vents are opening and remain open between our
 2 maintenance visit."
 3 Then this in caps, bold and underlined:
 4 "WE CAN NOT GUARANTEE CONFORMITY WITH FIRE
 5 REGULATION."
 6 I read it like that because that's how it reads on
 7 the page.
 8 "Actuation systems are not fit for purpose and must
 9 be replaces[sic] to the system to meet the fire
 10 regulation."
 11 Now, you've not seen that before. You would agree
 12 with me, I assume, that this is a pretty damning and
 13 unequivocally damning report about the state of the AOV
 14 system in August 2011?
 15 A. Yeah.
 16 Q. Yes. You have never seen it before; that explains, no
 17 doubt, why this was not made available to Carl Stokes.
 18 A. Indeed.
 19 Q. And you would accept, no doubt, that this would be
 20 information for him to have included in his FRA
 21 assessments, the next one of which was on
 22 20 November 2012; yes?
 23 A. Yes, absolutely. I mean, can I just say that I was
 24 aware — obviously the fire had brought to light that
 25 the system, there were starting to be problems with it,

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1 it was old, it was clunky, and I was pushing the
 2 building services engineers to push for budget so that
 3 the system could be replaced, but I wasn't aware there
 4 was this degree of concern or being raised by the
 5 contractors.
 6 So I'm aware that, for a number of the health and
 7 safety meetings, I was saying, "How are we getting to
 8 that? Have we procured?", and they'll reflect that
 9 I was pushing for that, but it wasn't on the basis that
 10 the system couldn't be relied upon. We just thought:
 11 it's getting old, it needs replacing.
 12 Q. Can we go to {TMO00869798}, then, please.
 13 Bear in mind that this is 9 August 2011, this
 14 report. What I'm now showing you is a minute of the
 15 asset investment and engineering health and safety group
 16 the following month, so five weeks later,
 17 15 September 2011. Present: Keith Fifield, and you in
 18 the chair and doing the minutes; yes?
 19 A. Oh, yeah, so I was.
 20 Q. Yes. Well, you sound surprised.
 21 A. No, I think John Borra used to always minute these, so
 22 I didn't realise that I'd stepped in.
 23 Q. He was apologetically absent.
 24 A. Yes.
 25 Q. Or at least sent his apologies.

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1 If we go to paragraph 2.2, you can see, "Matters
 2 Arising not on Agenda". Do you see that?
 3 A. Yes.
 4 Q. If you go to (e):
 5 "Previous Minute 10.2 — Replacement of Ventilation
 6 and Extraction System at Grenfell Tower; Detailed design
 7 including the fire alarm and smoke Ventilation now
 8 received. Works to be tendered imminently for December
 9 2011 start on site. KF confirmed that the autodialer
 10 for remote monitoring of the system when concierge staff
 11 are not present is to be arranged separately and in
 12 advance of these works. JW re-iterated that this is
 13 urgent and asked KH to update her asap with a timescale.
 14 Action K Fifield."
 15 A. Yeah.
 16 Q. Now, you can see that discussion there.
 17 Pausing there, you were aware from those minutes at
 18 the very least that work was going to be happening on
 19 the AOV; yes?
 20 A. That's exactly what I — yes, but that's exactly what
 21 I was just referring to, that we were pushing for it to
 22 be replaced.
 23 Q. Right. Is it the case that you did not have this report
 24 at this meeting?
 25 A. I did not have this report, but we had had the fire, and

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1 my understanding was that this piece of kit was not
 2 going to last forever, and I think it was originally
 3 from when the building was built, and it's an important
 4 piece of fire safety kit, so I wanted to make sure that
 5 it was always top of the agenda when they were
 6 budgeting. So I took every opportunity to say, "Where
 7 are we at with this? Have we done the procurement?
 8 Have we done the design?" I kept on kind of pushing it
 9 forward.
 10 Q. Yes. Why was it also urgent such that the works had to
 11 be tendered immediately if the system was old but still
 12 operating?
 13 A. Because procurement is really slow and you need to get
 14 all of this expedited. It can take months and months to
 15 go through all of the tendering processes to make sure
 16 that you're compliant with the contract regulations, and
 17 so I was just trying to make sure that everybody treated
 18 it with a degree of urgency so that the system didn't
 19 fail before we were in a position to replace it.
 20 Q. Can you think of any reason why Keith Fifield would not
 21 have brought the RGE Services report of 9 August 2011 to
 22 your attention in the context of this very discussion at
 23 this meeting five weeks later?
 24 A. No, just that he routinely didn't give me servicing
 25 reports, and I was probably busy doing other things and

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1 didn't routinely ask him, and trusted what he was
 2 telling me in good faith when he was summarising where
 3 he was at with each of his contracts.
 4 Q. But this is not just a servicing report, is it? This is
 5 a servicing report, a maintenance report, which contains
 6 in it in bold, underlined, in caps, a strongly-worded
 7 message that your AOV system at Grenfell Tower is
 8 non-compliant with the fire regulations, whatever that
 9 might mean. Can you explain why Mr Fifield would have
 10 kept that from you?
 11 A. No, I can't, and it's frustrating for me because
 12 I genuinely don't — am confident that I've never seen
 13 it. I don't know why anybody would have kept it from
 14 me. So, I mean, this reflects that I had concern and
 15 I was trying to push it forward, but my concern wasn't
 16 based on the full picture, it seems now.
 17 I can't answer for him, sorry. I don't know what
 18 reason there would have been.
 19 Q. I'm not asking you to answer for him, I'm really asking
 20 you to answer for the TMO, but also asking you to answer
 21 for yourself, and really dig deep into your memory and
 22 tell us if you're really sure that you didn't see this
 23 9 August 2011 report.
 24 A. I'm sure I didn't see it.
 25 Q. Okay.

30

1 Can we go to {TMO10002217}. These are minutes from
 2 a meeting which you had with Keith Fifield on
 3 16 January 2012.
 4 A. Yeah.
 5 Q. If we go scroll down to page 4 {TMO10002217/4}, just for
 6 your benefit, we can see that you signed these minutes
 7 with your name and your role there, so we know that
 8 they're yours.
 9 Can we then go back, please, to the first page
 10 {TMO10002217/1}, just to identify the document better.
 11 Do you recall seeing this document at the time?
 12 I think you drafted it, so —
 13 A. I drafted it. I would have regular meetings with
 14 Keith Fifield, just to make sure that I knew what was
 15 happening in his team and I could raise issues with him,
 16 so I would have drafted this, yeah.
 17 Q. Yes. If you go to page 3 {TMO10002217/3}, you can see
 18 item 13, "Grenfell Tower":
 19 "The replacement of the extraction and ventilation
 20 system at Grenfell Tower is being tendered, however,
 21 Janice is anxious to get the remote monitoring of the
 22 communal fire alarm at this block [actioned] urgently."
 23 A. Yes.
 24 Q. So, again, is this discussion happening between you and
 25 Mr Fifield with you in ignorance of the 9 August 2011

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1 report?
 2 A. Yes.
 3 Q. It's remarkable, that, isn't it?
 4 A. Well, it is now, as we sit here, but I could only act on
 5 the information that I had available at the time. And
 6 I was — I mean, that's the point I was making, that
 7 I was hounding him, I was bugging him about it
 8 constantly, because it was on my agenda and I thought it
 9 was really important that we progress it, and the
 10 monitoring thing also took too long to put in place.
 11 Q. Right.
 12 A. So this is one of my opportunities to raise it and
 13 minute it and ... no, I ...
 14 Q. I mean, I'm just thinking, standing here as I am asking
 15 you about this, there are only two possibilities, aren't
 16 there? Either you have forgotten the fact that you saw
 17 the 9 August 2011 report, which is possible, or else
 18 Keith Fifield deliberately concealed it from you and
 19 effectively misled you.
 20 If you can think of another possibility, do please
 21 tell me what that might be.
 22 A. I am confident I haven't seen it, but also, everything
 23 that you've shown — unless you show me something that
 24 proves that my memory's escaped me, everything you've
 25 shown me so far indicates how I would phrase things when

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1 I thought that they needed to be addressed, but it's not
 2 saying this isn't operational or I'm — I'm sure that if
 3 I had seen that report, these notes would reflect my
 4 enhanced concern because I'd seen that.
 5 Q. Looking back on it, sitting here now, do you have any
 6 reason to think that Keith Fifield would have misled you
 7 deliberately?
 8 A. No.
 9 Q. You trusted him?
 10 A. Yeah, I trusted him, yeah.
 11 Q. Now, can I ask you, then, please, to go back to your
 12 first statement and go to page 44 {TMO00000890/44},
 13 paragraph 201 again, which is where we see the
 14 correspondence from Tunde Awoderu referred to.
 15 A. Yes.
 16 Q. You have exhibited JW/43, 14 November 2012 email.
 17 Were you aware at the time that the Grenfell Tower
 18 Leaseholders' Association, which was the organisation
 19 that Mr Awoderu represented, also made complaints to
 20 Geoff Payne and Robert Black at the TMO in the same year
 21 as the fire, 2010, about the fire, among other things?
 22 A. I'm not sure whether I was. It's possible I was.
 23 I can't really recall, to be honest.
 24 Q. Did Daniel Wood, Robert Black or Anthony Parkes or
 25 anybody else at the TMO discuss with you your

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1 investigations into the 2010 fire before responding to
 2 Mr Awoderu, do you know?
 3 A. I think I would have spoken to Daniel Wood and possibly
 4 David Ward, who often responded, just to give them the
 5 history and all the information that I could give them.
 6 Q. Right.
 7 A. I'm not sure whether I spoke to Robert about it. It's
 8 possible, but I don't recall.
 9 Q. Right.
 10 Did you bring home to Mr Black the fact that the AOV
 11 system was not functioning, or at least not functioning
 12 properly so far as you knew it, and had not functioned
 13 properly, so far as you knew it, at the April 2010 fire?
 14 A. I think I circulated the email to Collette O'Hara, which
 15 had the details as they'd been presented to me —
 16 Q. Yes, you did, you're right.
 17 A. — pretty widely, and so —
 18 Q. Beyond that?
 19 A. I'm sorry, I can't recall. It's possible that I did,
 20 but I really can't recall. But it was pretty explicitly
 21 stated that there had been a failure in the system at
 22 that point in time. It's possible somebody phoned me up
 23 and asked me more questions, but I just can't recall,
 24 I'm sorry.
 25 Q. Now, can I ask you to go to {TMOH00027208/3}.

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1 Halfway down the page we can see that there is
 2 an email from you to Paul Dunkerton, 22 November 2012,
 3 under the subject "Fire Safety Enquiry from
 4 Grenfell Tower":
 5 "Hi Paul
 6 "As discussed attached is a copy of the e-mail
 7 I sent to the LFB Fire Safety Team following the
 8 Grenfell fire on 30th April 2012 ..."
 9 A. Yeah.
 10 Q. That is a typo for 2010, isn't it?
 11 A. Yes, it is, sorry.
 12 Q. If we go up to page 1 {TMOH00027208/1}, we can see the
 13 last email on the page there is from Paul Dunkerton to
 14 you and Daniel Wood on 30 January 2013, saying:
 15 "Please find attached draft response to Grenfell
 16 Tower Leaseholder Association's Fire Safety Enquiry.
 17 "Janice
 18 "I think we may need more info on item 3."
 19 A. Okay.
 20 Q. Was your email originally to assist Paul Dunkerton in
 21 responding to the GTLA?
 22 A. I believe so, yeah. I don't think Paul would have known
 23 the detail of the fire unless I'd provided it to him, so
 24 I think so.
 25 Q. I see.

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1 Did you ask for an update on the state of the AOV at
 2 that stage when responding?
 3 A. I honestly don't know.
 4 Q. Right. So you didn't go back to Keith Fifield and say,
 5 "What is the current position, please, with the AOV?"
 6 A. I honestly don't know whether I did or I didn't.
 7 I can't recall doing so.
 8 Q. If we go to page 2 {TMOH00027208/2}, which is the next
 9 email, we see you send a further email on
 10 25 January 2013 to Paul Dunkerton and Daniel Wood:
 11 "Below is the info I extracted from my e-mail to the
 12 LFB (attached) summarising the fire at Grenfell on
 13 30th April 2010 and which was included in the previous
 14 response to the Grenfell leaseholders. I remain of
 15 a view that it is not appropriate to disclose this
 16 e-mail (having originally discussed this with
 17 Janet Seward who was of the same view). However, in
 18 response to the specific points raised I would advise as
 19 follows ..."
 20 Then if you look down to 1, you can see this:
 21 "1. Fire Brigade reports in relation to the
 22 incident dated 30th April 2010.
 23 "— I have checked with the Lancaster West Estate
 24 Team who did request a copy of this report at the time
 25 but they do not think they ever received this. However,

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1 I would add that these are standard proformas with
 2 various sections redacted and can be of limited use. We
 3 have found it to be much more beneficial to meet with
 4 the LFB to discuss the details of the incident and as
 5 previously advised this is what we did.”
 6 That goes back to, I think, your evidence earlier,
 7 does it?
 8 A. Yes.
 9 Q. That that's why you didn't contact the LFB to ask for
 10 a copy.
 11 Nonetheless, do you accept that this appeared to be
 12 an issue of ongoing concern for the GTLA, so why not
 13 just ask the LFB for that report at that point, having
 14 been asked for it?
 15 A. It appears that my colleagues on the Lancaster West team
 16 had done so.
 17 Yeah, I mean, as I read it now, then why didn't I?
 18 I can't give you an explanation. I should have done.
 19 I think, in good faith, I thought my colleagues had
 20 already requested it.
 21 Q. Right.
 22 A. And I can't give you any other explanation, I'm sorry.
 23 Q. Okay.
 24 Then point 4:
 25 "Instruction or recommendations made to the

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1 KCTMO/EMB.
 2 "Recycling arrangements were investigated by the
 3 Lanc West Team and modified in consultation with RBKC.
 4 "Works to repair the ventilation/extraction system
 5 which were due to commence the following week were
 6 progressed and further investigations undertaken on this
 7 system to ensure there were no other areas of concern.
 8 "The LFB were given a briefing on this system."
 9 Again, there you don't mention the fact that the AOV
 10 system was in need of repair; why is that?
 11 A. Because I've said "Works to repair the ventilation" —
 12 I mean, I think the enquiry was specifically — had lots
 13 of questions very specifically around this fire, so
 14 I was responding to what we did and what we found when
 15 we investigated this fire, so that's what I'm referring
 16 to:
 17 "Works to repair the ventilation/extraction system
 18 which were due to commence the following week were
 19 progressed and further investigations undertaken on this
 20 system ..."
 21 Because that's what I'd been advised by my building
 22 services team.
 23 Q. Yes. I mean, clearly, your not having the RGE
 24 9 August 2011 report —
 25 A. No.

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1 Q. — and what it said meant that what you said there was
 2 a grotesque understatement.
 3 A. Yeah. What else can I say?
 4 Q. And that therefore the residents of Grenfell Tower were
 5 living in a building with an AOV system which had
 6 effectively been condemned as non-compliant by the
 7 maintenance engineers, but were doing so in ignorance,
 8 were living there in ignorance of that fact?
 9 A. That's ... I can't dispute that, but I didn't have that
 10 information, so I couldn't have provided it. Yeah. RGE
 11 were saying it couldn't be relied upon, so it's
 12 functioning to some degree, but I don't know how — to
 13 what degree, because that hadn't been brought to my
 14 attention.
 15 Q. And you hadn't pressed Keith Fifield for an RGE report
 16 up to date so that you could give residents the
 17 up-to-date position.
 18 A. No, it seems I didn't.
 19 Q. Now, let's move forward into the next year and look at
 20 March 2014.
 21 {LFB00032101}, please.
 22 This is a letter dated 24 March 2014 from the LFEPA,
 23 by which the TMO was issued with a notice of fire safety
 24 deficiency under the Regulatory Reform Order, the RRO,
 25 and we can see at the bottom of page 2 {LFB00032101/2},

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1 if we go there, please, that you were copied in to this
 2 personally. Do you see that?
 3 A. Yeah.
 4 Q. If we go to page 3 in the letter {LFB00032101/3}, in the
 5 schedule, next to Article 11(1), the LFB say this:
 6 "Failure in the effective monitoring of preventive
 7 and protective measures. For Example. A significant
 8 number (approx. 25%) of automatically opening vents
 9 within the common parts of the premises were found not
 10 to be in working order. No suitable system of
 11 monitoring was in evidence to identify deficiencies with
 12 the smoke ventilation system."
 13 The notice says:
 14 "Implement effective monitoring of preventive and
 15 protective measures."
 16 If you go to the next item down, Article 17, it
 17 also — I'm summarising — directs the TMO to:
 18 "Ensure that adequate maintenance systems are in
 19 place to ensure that the premises and any facilities,
 20 equipment and devices are maintained in an efficient
 21 state, in effective working order and good repair."
 22 Do you see that?
 23 A. Yeah.
 24 Q. That's actually a quotation, not a summary of what they
 25 say.

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1 Then on page 3, Article 21, at the foot of your
 2 screen:
 3 "Failure to ensure employees receive adequate safety
 4 training. Staff on site did not appear familiar with
 5 actions to be taken in response to the fire safety
 6 system."
 7 And it explains why.
 8 Now, none of these issues — is this right? — had
 9 been raised by Carl Stokes previously in any of his fire
 10 risk assessments for Grenfell Tower, either in
 11 November 2012 or before that?
 12 A. I don't think they were, no.
 13 Q. No, we can't see them there.
 14 Nonetheless, can we move on to {CST00003100}.
 15 Now, the letter I've just shown you is dated
 16 24 March. This is a letter from Carl Stokes the
 17 previous week, 18 March 2014, to Claire Williams, and it
 18 says:
 19 "Premises: Grenfell Tower [and the other buildings
 20 on the Lancaster West Estate] ...
 21 "Thank you for asking me to comment on the questions
 22 raised by the London Fire Brigade (LFB) officers during
 23 they visit to the above buildings on the Lancaster West
 24 Estate on 12th March."
 25 Then if you go to page 2 {CST00003100/2} — and he

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1 says, in the first paragraph we've skipped away from,
 2 that he visited on 17 March, which was the day before
 3 his letter.
 4 He says on page 2, the very top of the page:
 5 "The emergency smoke control extract panel was
 6 showing healthy when looked at yesterday with the switch
 7 in the auto position."
 8 Then he goes on to give more details about that.
 9 Now, the letter is addressed to Claire Williams, as
 10 we've seen. Did you see the letter at the time?
 11 A. Yes.
 12 Q. You did. How come? Did Claire Williams pass it on to
 13 you?
 14 A. Carl was inclined to copy me in to not everything he
 15 did, but most of what he did.
 16 Q. Right.
 17 Now, as I've shown you, his conclusion in his letter
 18 here about the monitoring and inspection of the AOV,
 19 namely that it was showing healthy and up to date and
 20 there were no issues, appears to be at odds with the
 21 LFB's conclusion in their notice of deficiency the
 22 following week that there was no adequate maintenance
 23 system in place next to the notation under
 24 Article 17(1). That's right, isn't it?
 25 A. Yes. I think he recommended that we bring forward the

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1 next planned preventative maintenance servicing, and
 2 that's what he requested, so that there'd be
 3 an independent specialist check on the status.
 4 Q. Were you not concerned at the time by at least
 5 an apparent inconsistency between what Carl Stokes was
 6 advising and what the LFB then did the following week?
 7 A. Well, I — so I think the LFB had actually been on the
 8 12th but we didn't get their paperwork until the 24th or
 9 whatever, so Carl — Claire has asked Carl to attend and
 10 investigate the issues which were raised.
 11 My understanding is that he commented on the supply
 12 saying healthy, but that he recommended that we bring
 13 forward the servicing so that we would have the
 14 specialist contractors look at the system to make sure
 15 that — because he's obviously not going to be testing
 16 the system, but we need to investigate more thoroughly,
 17 and so that's what he recommended we do, which will have
 18 been what we asked the contract management team to do,
 19 so that we had a proper assessment of the condition of
 20 the AOV.
 21 Q. Let me just press you for an answer: were you not
 22 concerned that there was at least an apparent
 23 inconsistency between what Mr Stokes was saying, namely
 24 that the emergency smoke control extract panel was
 25 showing healthy and up to date and no issues on the one

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1 hand, but the LFB were saying that it wasn't because
 2 a quarter of the vents weren't working?
 3 A. I don't think he was saying it's okay. I think what he
 4 says about the supply healthy does seem to be borne out
 5 by the photograph, but he recognises that he isn't in
 6 a position to assess in the way that the specialist
 7 contractors will. So they can test the system where
 8 he's not really able to. So I think he recognised the
 9 limitations of his visual survey and was recommending
 10 that we get the specialist contractors in to check,
 11 which I think was the right thing to do.
 12 As to — you're asking me about inconsistency.
 13 Q. Yes. Were you struck by an inconsistency?
 14 A. I would have expected — if the Fire Brigade are saying
 15 25% of the vents don't seem to be firmly closed or are
 16 partially open, I would have expected that to be
 17 reflected in Carl's report.
 18 Q. Indeed.
 19 A. But because he has identified that this needs looking at
 20 by a specialist contractor, then at least he's
 21 recognised that his visual inspection isn't the end of
 22 the story, that we need to do more thorough checks.
 23 Q. Now, if we go down to page 11 of this letter
 24 {CST00003100/11}, you can see that there is a heading,
 25 "My comment and recommendations", and under item 1 it

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1 says:
 2 "The next quarterly service is imminently due on the
 3 emergency smoke extraction system ... I would recommend
 4 the contractor is asked to service the system sooner
 5 rather than later and any findings etc ... are actioned
 6 upon. If this system is in working order there is no
 7 requirement to a CFD analysis to be undertaken."
 8 That's where one finds his effective conclusion and
 9 recommendations.
 10 My point again: were you not struck by the
 11 inconsistency between what he is saying there and what
 12 the LFB came up with only a week later, or two weeks, if
 13 you like, after their visit?
 14 A. I mean, the LFB are also doing a visual check, so I've
 15 got two people doing a visual check. What I need is
 16 somebody to check the system to give me comprehensive
 17 information, and it seems to me that that is what
 18 I need, is the specialist contractor who are engaged to
 19 work on that bit of kit to give us a meaningful report.
 20 So I still need that.
 21 I appreciate the point you're making that Carl
 22 hasn't commented on vents being open and he has
 23 commented on the supply being healthy. I didn't take
 24 that to be contrary to what the Brigade were saying.
 25 What I took it to mean — just to back up the fact that

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1 we needed a proper report by people who understood the
 2 system and could service it or maintain it so that we
 3 had an accurate view of the status or condition.
 4 Q. Were you yourself concerned that, although there had
 5 been, at least as reported to you, repairs done at the
 6 end of 2012/early 2013, the AOV system in Grenfell Tower
 7 was now playing up again to such an extent that it had
 8 been the basis of a notice of deficiency in March 2014?
 9 A. I think this goes back to what I've said before. We
 10 knew that the system was not going to last forever and
 11 it needed attention, hence me raising it regularly to
 12 say, "When are we going to design a new system,
 13 re—procure a new system?"
 14 In preparing to come, I read quite a lot of minutes
 15 from that meeting, and it seems to me that we got to the
 16 point where the design was ready and the procurement was
 17 ready to go, and at that point, running sort of in
 18 parallel, was the decision to do the refurbishment works
 19 at Grenfell Tower, and went, "Okay, I'll take that bit
 20 of work and incorporate it into".
 21 So I think, in retrospect, that did cause a delay in
 22 dealing with the AOV. I think — I believe, from what
 23 I've read, that we were at the point where we could have
 24 done the replacement works as part of — you know, the
 25 building services team could have overseen that. But

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1 because the refurbishment work was being discussed at
 2 that time, that meant that work got parked and then got
 3 subsumed into the other work, which inevitably caused
 4 a delay.
 5 The system still is not going to last forever and
 6 still needs scrutiny and monitoring, and that's where
 7 I think we had got to.
 8 So I'm not surprised that it's still potentially
 9 problematic, but my point is: I don't know how
 10 problematic, which is why I think we need somebody who's
 11 a specialist to go and tell us.
 12 Q. Were there any interim measures in place before
 13 March 2014?
 14 A. Before, sorry?
 15 Q. March 2014, before the notice of deficiency. Were there
 16 any interim measures —
 17 A. Not that I'm aware of, because I'm still not being told
 18 that it's — we know that it's not going to last
 19 forever, but at this stage I still believed it was
 20 functioning, so I'm not aware that there were interim
 21 measures at that point.
 22 Q. So the LFB's or LFEPA's notice of deficiency letter must
 23 have come as something of a shock to you, or at least
 24 a mild surprise, perhaps?
 25 A. Well, yeah. I mean, it did indicate that the system had

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1 potentially deteriorated again or, you know, was perhaps
 2 only partially working, but I didn't know until we got
 3 some meaningful information. But, yeah, it indicated
 4 there's a problem and it needs investigating.
 5 Q. The notice of deficiency letter indicated — well,
 6 demanded — that a cure be effected by 5 May 2014; yes?
 7 A. Yes.
 8 Q. The recommendations had to be carried out by 5 May 2014.
 9 Were any of those recommendations implemented by
 10 5 May 2014?
 11 A. I don't know the answer to that as we sit here. Carl
 12 had produced his report. That was circulated to the
 13 contracts management team and anybody else who needed to
 14 action anything within that. I would have been chasing
 15 for responses. I know I was chasing for — and I think,
 16 although I may be wrong, this coincided with the time
 17 that RGE left and another interim contractor came on
 18 board.
 19 I think Alex Bosman was in post by then, so it was
 20 Alex who I would have been chasing to get the servicing
 21 done, to get the maintenance contractor there, to
 22 identify any problems, and he was well aware of the need
 23 for interim measures.
 24 And the other thing I'm aware of which is also
 25 relevant — sorry, I know I'm being long-winded — is

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1 when the tender was being prepared, which was late 2013,
 2 for the refurbishment work, I wrote to the project
 3 manager to say, "If you are including the AOV system in
 4 your works, you need to be aware that if it is going to
 5 be non—operational for a period, then we will need to
 6 have interim measures, we will have to keep the
 7 Fire Brigade advised, and also, can this be prioritised
 8 to the very front end of the programme", and I found
 9 that email recently, so I know that I did that. So I've
 10 been trying to keep it on everybody's agenda and be
 11 clear that it's really crucial, it needs to be treated
 12 with priority.

13 Q. Did you tell Barbara Matthews or — well, did you tell
 14 Robert Black at that point, or at this stage it's
 15 March 2014, so Anthony Parkes, about the arrival of the
 16 notices of deficiency?

17 A. I'm sure I would have done.

18 Q. Would you have done so by email or would you have told
 19 them face—to—face and shown it to them?

20 A. I might have shown it to him.

21 Q. Right.

22 A. I'm not sure.

23 Q. Was it discussed at a health and safety committee or at
 24 meetings of the TMO executive or TMO board at the time,
 25 do you remember?

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1 A. I wouldn't have been on either of those, so I wouldn't
 2 be the person who could confirm or deny.

3 Q. Right.

4 Did you yourself take any steps to arrange any
 5 interim measures to be in place after you had received
 6 the notice of deficiency of 24 March 2014?

7 A. I'm not really ... did I? I saw the interim measures as
 8 being very clearly something technical that we would
 9 have to put in place to either enhance the performance
 10 of the automatic opening vents or to temporarily replace
 11 it, so it's really — I see that as being really quite
 12 a technical matter. So I saw that as sitting with
 13 either the contract management team or the project team,
 14 and I would have been making it clear to both of them
 15 that they have specialist consultants and contractors
 16 under their jurisdiction and this is really crucial, and
 17 what can we do for interim measures.

18 MR MILLETT: Mr Chairman, it's nearly 11.15. I'm about to
 19 turn to a different topic. I could finish that topic in
 20 about 15 minutes, if you're prepared to sit a little bit
 21 longer into the morning, given the late start we had.

22 SIR MARTIN MOORE—BICK: We've had a bit of a hiatus already,
 23 haven't we?

24 MR MILLETT: Yes.

25 SIR MARTIN MOORE—BICK: Do you feel comfortable going on for

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1 another 10/15 minutes?

2 THE WITNESS: I don't mind. Yes, that's fine.

3 SIR MARTIN MOORE—BICK: Shall we try that one, Mr Millett?

4 MR MILLETT: There's also our transcriber as well.

5 SIR MARTIN MOORE—BICK: Well, Jo is always very
 6 accommodating on these things, but you're quite right to
 7 ask. Yes, are you all right? Right.

8 MR MILLETT: Thank you very much to all of you. Thank you.
 9 In which case, let's move to later in the year,
 10 2014.
 11 {LFB00084118}. This is a minute of a bi—monthly
 12 meeting that you attended with the LFB,
 13 13 November 2014, at 9.30. We can see who was present:
 14 Suhail Dadabhoy, Rebecca Burton, Terry Chaplin covering
 15 for Dan Hallissey, and you. If we go to item 1, you can
 16 see Claire Williams was not there.
 17 If we go to the top of page 2 {LFB00084118/2}, we
 18 can see that there's a minute that says that you gave
 19 an update:
 20 "Grenfell Tower — Janice advised that our
 21 fire consultant had now completed a review of the FRA
 22 for this block. This had been undertaken in close
 23 liaison with the Principal Contractor, Rydons, and can
 24 be made available to the LFB. Janice advised that
 25 Rydons were finding the local LFB crews' regular

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1 familiarisation visits to the Tower to be really
 2 helpful."

3 Now, it doesn't seem as if there was any discussion
 4 at all about the AOV system at that meeting. Is that
 5 right?

6 A. It seems to be right, yes.

7 Q. Later that day — let's see {TMO00852028} — we'll see
 8 that Claire Williams, the same day, forwards you emails
 9 between her and Rydon about the AOV.

10 A. Okay.

11 Q. So we go down to page 3 {TMO00852028/3}, I think is the
 12 best place to pick this up, where Claire Williams writes
 13 to Simon O'Connor. He was the site manager for the
 14 project at Grenfell.

15 A. Yes.

16 Q. "Subject: Grenfell AOVs.
 17 "Simon
 18 "Can you please update me on the above?
 19 "1 AOV work at Grenfell — at the M&E meeting the
 20 other day there was discussion over what could be done
 21 on the system — can you do me a short paragraph TODAY
 22 before our meeting with the fire brigade tomorrow ...
 23 "Thanks."
 24 Then if you go up to page 2 {TMO00852028/2},
 25 Simon O'Connor comes back to her, copied to

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1 Simon Lawrence and says:
 2 "Probably best that Simon L responds to this as he
 3 is leading the design on this item."
 4 We do get Simon Lawrence's response if we scroll
 5 higher up page 2. We probably need the bottom of page 1
 6 for the email detail. We can see it's from
 7 Simon Lawrence, 13 November 2014, to Simon O'Connor and
 8 Claire Williams.
 9 The reason I'm showing you this in detail is that
 10 higher up the chain this comes to you, and we'll look at
 11 that in a moment.
 12 Looking at what he, Simon Lawrence, says on
 13 13 November 2014, at the top of page 2:
 14 "Morning Claire,
 15 "As per our conversation at Tuesdays meeting. Our
 16 M&E design team have been working hard on finding
 17 a solution to the AOV situation where we can urgently
 18 install now to get Grenfell some protection asap. We
 19 are trying not to carry out any costly abortive works
 20 but are trying to install a part system now then upgrade
 21 in the following months. So far out of the 4 different
 22 specialists we have approached only one feels they are
 23 able to carry out the works to this method so no works
 24 are abortive. We are currently arranging a meeting with
 25 our specialists and Building Control to ensure everyone

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1 is in agreement with the proposed design. In our
 2 initial meeting with Janice and Carl I said that we
 3 would aim to get a part system operational by Christmas.
 4 We are still doing our best to achieve this but the
 5 early feedback from the specialists on Tuesday is that
 6 it is unlikely to be before Christmas, however I'm
 7 awaiting their response to tell me when. I'll let you
 8 know as soon as I have some more news. In the meantime
 9 you still only have the existing smoke detector and
 10 visual fire panel alarm covering the building."
 11 Now, that then comes to you the same day, if we go
 12 up to page 1 {TMO00852028/1}, at 1.59 pm. Do you see
 13 that?
 14 A. Yeah.
 15 Q. Second email down there. She says:
 16 "Sorry, in training and only just picked this up."
 17 Did you forward this update on to those from the LFB
 18 who had attended the meeting that morning,
 19 Suhail Dadabhoy and Rebecca Burton?
 20 A. I don't think I did, no.
 21 Q. Why is that?
 22 A. I don't know, actually. I can't give you
 23 an explanation. Claire was — by this stage, the AOVs
 24 were, I believed, under the control of the project team.
 25 It was for them to input interim measures, it was for

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1 them to ensure maintenance if necessary.
 2 Claire was invited to the liaison meetings so she
 3 could provide an update. Clearly from what you've just
 4 showed me, the info that I had to take to the meeting
 5 was pretty minimal. And my understanding was that the
 6 project team had their own liaison with the Fire Brigade
 7 on site as well, so they were regularly updating the
 8 teams and advising them of the status of the systems.
 9 But, yeah, we should have advised the fire safety
 10 team as well as the operational crews.
 11 Q. You reply, if we look at the top of page 1, about
 12 an hour later.
 13 A. Yeah.
 14 Q. "Thanks — grateful for you keeping me in the loop.
 15 "Fortunately, the LFB did not raise any specific
 16 issues on Grenfell."
 17 If your —
 18 A. Because I didn't have any information to give them.
 19 I told them what she'd given me to tell them and now
 20 this has come to light. So you're right, I should have
 21 forwarded it to them, but —
 22 Q. Well, it's more than that, isn't it? Did your response
 23 not mean that you were only going to update the LFB to
 24 the extent that they asked about the AOV or the
 25 deficiency notice?

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1 A. No, no. I'm not part of the project team, so there's
 2 all sorts of things going on that I'm not party to,
 3 which was the point of Claire, when she could, attending
 4 the meetings so she could give them specific updates,
 5 and I've updated with the information I've been given.
 6 If they've asked me wider than that, I'm unlikely to be
 7 able to give them comprehensive information.
 8 Q. Why was it fortunate that the LFB did not raise any
 9 specific issues on Grenfell?
 10 A. Because Claire wasn't there to address them.
 11 Q. I don't understand.
 12 The LFB didn't raise any specific issues on
 13 Grenfell. In the light of what you're now being told,
 14 why was that lucky? Why was that fortunate?
 15 A. I'm giving her feedback on the meeting. There are two
 16 sort of separate issues going on here. I'm giving her
 17 feedback on the meeting that she wasn't able to attend,
 18 that fortunately they haven't raised any specific
 19 issues — if they'd raised any specific issues, I would
 20 have had to take them to Claire and said, "Can we get
 21 back to you", because I wouldn't have probably had the
 22 information that they required because I'm not part of
 23 the project team.
 24 Q. Well, isn't actually what you're saying that it's very
 25 lucky that the LFB didn't ask you about the AOV at

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1 Grenfell because, had they done, either you wouldn't
 2 have had an answer, which would have been embarrassing,
 3 or you would have had to give them the facts, which
 4 would have been worse?
 5 A. But I didn't have the facts. Sorry, that's the point
 6 I'm trying to make, I didn't have access. I do now, or
 7 I've certainly got a clearer steer, but I didn't have
 8 them at the meeting, so there wasn't very much I could
 9 have told them.
 10 Q. Moving on in time, then, {TMO10008792}.
 11 This is the minute of a TMO health and safety
 12 operational meeting, 21 November 2014.
 13 A. Okay.
 14 Q. We can see that you are present, among others.
 15 If we go to the bottom of page 1, we can see:
 16 "Grenfell Tower Fire Safety — JW confirmed that the
 17 TMO are looking to ensure that we integrate the most
 18 recent fire safety kit. LFB are not engaging with
 19 Eddie Daffarn."
 20 Then if we go over the page {TMO10008792/2}, it
 21 says:
 22 "Rydons have done everything LFB have asked them to
 23 do. In regards to the vents, Rydons were sourcing
 24 a contractor to get the works done as soon as possible.
 25 It is likely to be after Christmas. Rydons have

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1 explained to LFB that the system is beyond economical
 2 repairs and LFB are aware to be appropriately equipped
 3 when arriving to deal with fires."
 4 Did you know who it was at the LFB Rydon had told
 5 that the existing AOV system was beyond economical
 6 repair?
 7 A. No, and I think that's actually Peter that's been quoted
 8 there, because I think that's his phrase, isn't it,
 9 "beyond economical repair"?
 10 Q. You have to tell me that. Is that right?
 11 A. I believe so.
 12 Q. Right.
 13 A. But, again, I wouldn't necessarily have had the detail.
 14 I had been pushing them to get the vents — whatever
 15 work had to be done to the AOVs, to get it done as
 16 priority, and there'd always been, I believe, a sort of
 17 expectation that they would try and — Christmas would
 18 be a target, and frustratingly, Christmas seems to have
 19 slipped. But I think the detail here is being provided
 20 by Peter and not by me.
 21 Q. Right. But did you not understand what he meant when he
 22 said — let it be assumed he did — "Rydons have
 23 explained to LFB"? Who did you think he meant? Given
 24 that you had been attending the bi-monthly meetings, who
 25 was it, in your mind, whom Rydon had told that the

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1 system was beyond economical repair?
 2 A. My understanding would be that it would be the
 3 operational crews who were doing the regular
 4 familiarisation visits and their team leader or station
 5 manager. That's what I'd have believed.
 6 Q. And what, to you, did the phrase, "LFB are aware to be
 7 appropriately equipped when arriving to deal with fires"
 8 mean?
 9 A. Erm ... I sort of assume, as I sit here now, that it
 10 would be they had the right — appropriate — they had
 11 additional breathing apparatus or they could have had —
 12 I don't know, really, I'm speculating.
 13 Q. You don't know.
 14 A. They would have been aware of what the issue is, and
 15 they — I'm assuming they had some steps that they could
 16 take themselves to deal with the risk.
 17 Q. Right.
 18 Now, this is 21 November 2014. Can we take it that
 19 by this point, to your knowledge, the LFB fire safety
 20 team had been told that the AOV system at Grenfell Tower
 21 was beyond economical repair?
 22 A. Claire would have to confirm who in the LFB knew, which
 23 was your question to me, apologies. I don't know who
 24 she's advised, sorry.
 25 Q. Were any other mitigating measures or any mitigating

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1 measures discussed and agreed with the LFB at this
 2 stage?
 3 A. Not to my knowledge.
 4 Q. Can you explain why not?
 5 A. I can't explain why not. I can explain that I'm still
 6 pushing the project team, as I said. When the tender
 7 was being drafted, I asked for it to be included that
 8 interim measures would be absolutely required and the
 9 Fire Brigade would need to be kept on board. So the
 10 contractors have always been clear that part of their
 11 schedule of work is to replace the AOV. My assumption
 12 would be that, when they submitted their tender, that
 13 would very clear have their RAMS and their proposal for
 14 how that would be addressed, and yet we don't seem to be
 15 getting any interim measures.
 16 There's clearly activity where they're approaching
 17 specialist contractors and trying to get a partial
 18 system in place, but I don't know the detail of that, so
 19 all I can do is keep chasing and chasing, and also
 20 chasing Alex Bosman to see if his specialist contractor
 21 can put something in place.
 22 But, frustratingly, that's all I can do, is keep
 23 chasing these individuals and saying, you know, "What
 24 else? What else? What more can we do?" You know,
 25 "What are all of your fire safety specialists that

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1 you've got access to, what are they saying?"

2 Q. From what you could see here and observe at the

3 bi-monthly meetings up to that point in time, you had

4 not seen or heard anything which would lead you to think

5 that the LFB fire safety team with whom you were

6 liaising bi-monthly knew that the AOV system at

7 Grenfell Tower was beyond economical repair?

8 A. Yeah, you're right, I hadn't seen anything to that --

9 Q. Or that there were any interim measures in place to

10 mitigate?

11 A. Again, from the information I've got, it doesn't look

12 like there are, but I'm not on the ground.

13 Q. Right.

14 One more email before the break, if we may, Ms Wray.

15 Claire Williams to you on 11 December 2014, at

16 {TMO00857817}, please.

17 We can see at the second half of the screen

18 Claire Williams emails you on 11 December:

19 "Grenfell smoke vents.

20 "Janice

21 "At our site meeting today Rydon confirmed ..."

22 You can see that?

23 A. Yeah.

24 Q. In the third bullet point:

25 "It is clear now that work won't start until the new

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1 year, as works are dependent on how quickly the building

2 control team can turn around the application."

3 A. Yeah.

4 Q. Do you see that?

5 A. Yes.

6 Q. You respond at the top of the screen, if we can go to

7 that:

8 "Thanks Claire -- let's hope our luck holds and there

9 are no fires in the meantime.

10 "When will the main door be secured?

11 "Please advise.

12 "Thanks.

13 "Janice."

14 What did you mean by, "Let's hope our luck holds and

15 there are no fires in the meantime"?

16 A. I would never normally word anything like that. I was

17 utterly frustrated that, having chased all sorts of

18 people about interim measures and have highlighted the

19 issue of the AOVs definitely going to be taken down to

20 be replaced before the tender had even gone out,

21 I have -- and then I've been told that it will be done

22 by Christmas, now it clearly won't be done by Christmas,

23 and from what I can see, there aren't significant

24 interim measures in place, and I was utterly frustrated,

25 because what more could I have done, other than keep

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1 chasing and getting people with specialist contractors

2 and consultants to provide technical advice? I'm not

3 an engineer, so I'm reliant on those. So, yeah, I ...

4 Q. By luck, were you concerned because there was

5 an increased fire safety risk to the residents posed by

6 the absence of an operating AOV system, or were you

7 concerned because a fire would expose your own failure

8 to ensure that one was working?

9 A. I was concerned about fire safety to residents, to

10 staff, to contractors, to anybody who could -- who would

11 potentially have to face it, and that's why I had been

12 banging on, boring people with interim measures and the

13 need for them and the need to consult their specialist

14 fire safety engineers in order to get those in place,

15 and even with all of that resource in two locations,

16 we're in a position where I'm now being told not only

17 have we not done that, we've not been able to do that,

18 but actually now the timeframe had slipped again.

19 Q. Did you think that hoping your luck would hold was any

20 kind of proper approach to fire safety?

21 A. Of course not. It was a glib comment and I regret it,

22 and in my defence, it's -- I don't normally communicate

23 in that way, I genuinely was utterly frustrated and

24 exasperated that this hadn't been addressed.

25 Q. Leaving that on one side, do you accept that the

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1 residents were entitled to expect more from you

2 personally than crossed fingers?

3 A. Of course.

4 MR MILLETT: Mr Chairman, is that a convenient moment?

5 SIR MARTIN MOORE-BICK: Yes, thank you, I think it is.

6 We'll have a break now, Ms Wray. We'll come back to

7 start again at 11.45, please. And please don't talk to

8 anyone about your evidence while you're out of the room.

9 All right? Thank you very much.

10 (Pause)

11 Thank you. 11.45, please. Thank you.

12 (11.30 am)

13 (A short break)

14 (11.45 am)

15 SIR MARTIN MOORE-BICK: All right, Ms Wray, ready to carry

16 on?

17 THE WITNESS: Yes.

18 SIR MARTIN MOORE-BICK: Good.

19 Yes, Mr Millett.

20 MR MILLETT: Yes, thank you, Mr Chairman.

21 I'm going to ask you some questions about the new

22 AOV system from January 2015.

23 Before I do, can I just take a step back into some

24 exchanges we had earlier this morning about the RGE

25 report.

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1 Can I ask you, please, to go to {MAX00001426}.

2 Now, this is the record of significant findings and

3 action plan from 20 November 2012. You see that?

4 A. Yeah.

5 Q. But it's been completed in the right-hand column, if you

6 see, for the first item there, "FRA reviewed April 2013

7 & outstanding actions raised"; do you see that?

8 A. Yes.

9 Q. First, do you know who it was who completed the review

10 in April 2013?

11 A. I believe it was a low-level review, so it was probably

12 my colleague Adrian Bowman.

13 Q. Did you supervise it, did you see the fruits of his

14 labour, or did you just let him get on with it?

15 A. I would have seen his findings, yes.

16 Q. Right. So you would have seen this document?

17 A. Yes, I believe so.

18 Q. Right.

19 Can we go to page 7 {MAX00001426/7}. You can see

20 there's a number 23c, red, high. Comment:

21 "There are automatic opening vents on each

22 flat/ lift lobby area, it is not known if this system is

23 serviced and maintained."

24 Then the recommendation from Mr Stokes:

25 "Can it be confirmed that the automatic opening

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1 vents on each flat/ lift lobby area are serviced and

2 maintained in accordance with the manufacturer's

3 instructions."

4 Then Ricki Sams appears, and then:

5 "TMO have been informed Vent Needs Changing Resent

6 Quotes and Reports."

7 Then this at the end:

8 "Reported since 2009 that RGE can not guarantee that

9 in the event of an emergency this system will work;

10 Report sent; additional copies to be provided to Alex.

11 COMPLETED."

12 What was that a reference to?

13 A. Okay, so this is, sorry, 2012, so this is when my

14 colleague attended in 2013 to review —

15 Q. April.

16 A. April 2013. I mean, I haven't got any more information

17 than what there is here. I think it seems to be

18 reiterating the fact that we knew the system was old and

19 would need replacing.

20 Q. No, it's more than that, isn't it? It's telling you

21 that there has been a report since 2009, and this is now

22 April 2013 —

23 A. It is, yeah.

24 Q. — that RGE, who were the maintenance contractors,

25 cannot guarantee that, in the event of an emergency, the

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1 system will work, not that it was just old and needed

2 replacing.

3 A. Yes.

4 Q. Therefore, can we take it that even if you hadn't seen

5 the 9 August 2011 report with the caps and the

6 underlining and the bold message, nonetheless the

7 message in that report is reflected in what I've just

8 read to you in this column in this document?

9 A. Yes, which would be why I was pushing them to replace

10 it. It's another reason why we needed to get on and do.

11 Q. Right. So can we take it that, from April 2013, you

12 knew that the AOV system at Grenfell Tower would not

13 work in the event of an emergency?

14 A. I don't think it could be relied on to work in the event

15 of an emergency, but I don't think I would say that it

16 would not work.

17 Q. All right. You knew that there was no guarantee that,

18 in the event of an emergency, it would work?

19 A. That's what the information seems to say, yes.

20 Q. Nonetheless, can we take it also that, notwithstanding

21 that message which you can be taken as having seen in

22 April 2013, you yourself took no steps to put in place

23 any interim measures to mitigate the risk indicated by

24 those words there?

25 A. I myself, no.

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1 Q. No.

2 A. I believe the onus would have been on the contracts

3 management team, as their kit — it's their kit that

4 can't be relied upon, and they've got the expertise to

5 identify what could or should be put in place to

6 supplement or prop up or enhance or replace.

7 Q. Was the onus not on you, as the competent person for the

8 purposes of the RRO and the effectively senior—most

9 operational manager in charge of health and safety

10 across the TMO stock, to make sure that effective

11 interim measures were put in place in order to mitigate

12 the risk presented by this defect?

13 A. I think it's for me to ensure that people are aware of

14 their responsibilities in their area of control, and to

15 remind them, and to reiterate, and to escalate. But

16 I can't ensure that it's done. That's the problem.

17 I can't ensure that it's done. I can keep on being

18 their guilty conscience and cajoling and hassling and

19 reminding, but I'm not in a position to make sure that

20 it's done, because I don't have that relationship,

21 I don't have access to contractors. That sits under the

22 contracts management team. It's their responsibility,

23 and I think that's quite clear in our health and safety

24 policy statement, that that's their obligation in

25 relation to this type of kit.

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1 Q. But isn't that really just a way of shifting the blame?
 2 You could, couldn't you, have gone to your line manager
 3 or insisted your line manager go to their line manager
 4 or brought it to the attention of the chief executive so
 5 that Mr Black could have wielded his supreme power and
 6 come down hard on the contracts team?
 7 A. But the minutes of the all the various meetings reflect
 8 that this is an issue and this needs resolving, so I am
 9 escalating it. My point is that I don't have control,
 10 and it wasn't my role to have control. It's my role to
 11 make sure people are clear of their responsibilities and
 12 to reiterate and to cajole and to complain and to
 13 escalate, but I can't control that.
 14 Q. But if you're banging your head against a brick wall,
 15 you don't just carry on, do you? You do something about
 16 it.
 17 A. No, because I'm escalating it, aren't I? I mean, I'm
 18 escalating it every time there's an opportunity, and I'm
 19 having one-to-ones with the heads of — Ricki Sams'
 20 predecessor and his successor, and I still can't ensure
 21 it.
 22 Q. No, I understand that. My question was a different one.
 23 I'll put it one more time: was there any reason why you
 24 couldn't have gone directly to Robert Black and said,
 25 "Something's going wrong, they're not performing, I need

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1 someone with more power than me to make sure they do?"
 2 A. There was no reason I couldn't have done that, but
 3 I believe that I would have escalated it to at least
 4 Peter Maddison's level, and he's in charge of all the
 5 technical stuff, obligations, responsibilities.
 6 Q. Let's look at the new AOV system in January 2015.
 7 {TMO00846731}. This is an email which
 8 Claire Williams is sending to you, as you can see, on
 9 5 January 2015, in which she forwards to you an email
 10 from the GTLA dated 2 January 2015. Can you see that?
 11 A. Yes.
 12 Q. If we go to the top of page 2 {TMO00846731/2}, we can
 13 see the title of the email:
 14 "Improvement work on existing smoke extraction and
 15 ventilation, system which links to the fire alarm, under
 16 the Grenfell Regeneration Project."
 17 If we go back to page 1 {TMO00846731/1} — I'm sorry
 18 to jump around — we can see that Claire Williams says
 19 to you in her email to you:
 20 "Please be aware. Peter M is drafting a response,
 21 and I am just confirming Rydon's programme for these
 22 works."
 23 Now, by this time, you were aware, I'm assuming,
 24 that GTLA had already raised in the past concerns about
 25 the AOV at Grenfell?

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1 A. I believe so, yes.
 2 Q. And did so, indeed, in 2012; yes?
 3 A. Yes.
 4 Q. And, in fact, possibly also in 2010; yes?
 5 A. Erm —
 6 Q. Because of the fire on 30 April 2010 which we looked at
 7 this morning.
 8 A. Yes, I just can't recall the dates, but yes.
 9 Q. So there have been two fires and two occasions for that.
 10 Now, the LFB had issued a deficiency notice relating
 11 to the AOV in March 2014; yes?
 12 A. Yes.
 13 Q. And the existing AOV system was "not working" and the
 14 new system hadn't been installed by January 2015; yes?
 15 A. Yes.
 16 Q. What information, if any, did you think that the GTLA
 17 should have had about the state of the AOV in response
 18 to their questions?
 19 A. Well, they should have had a truthful response,
 20 shouldn't they?
 21 Q. Yes.
 22 Now, would you take it from me that there were no
 23 further updates minuted in any of the meetings with the
 24 LFB to the effect that the existing AOV system was not
 25 operational. Take it from me that that is the case.

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1 Are you able to explain why it was that the LFB were
 2 not updated about the state of the AOV in the first part
 3 of 2015?
 4 A. No, I'm not. I'm aware that I was being advised by
 5 Claire Williams and the project team that they were
 6 having regular discussions with the operational crews
 7 who were doing familiarisation, who would be the people
 8 who obviously attended in the event of a fire, and I —
 9 and the team were aware of the need to keep the Brigade
 10 updated and the need for interim measures and all the
 11 things that we've discussed. So I can't give you any
 12 explanation. We should have also included that
 13 information in the progress meetings.
 14 Q. Yes.
 15 Now, let's go, then, to Carl Stokes' FRA for
 16 April 2016, and let's look at the — well, we will in
 17 a moment — significant findings and action plan
 18 relating to that FRA.
 19 Before we do, can we go, please, to your first
 20 statement at page 21 {TMO00000890/21}, and let's look
 21 together at paragraphs 90 and 91.
 22 You say there at 90:
 23 "The AOV system was assessed by Carl Stokes as
 24 recently as 20 June 2016, with Carl observing that
 25 a Notification of Fire Safety Deficiency had been issued

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which required that a maintenance schedule be put in place to ensure that the new AOV system was maintained and kept in good working order ..."

Then at 91:

"Carl incorporated this recommendation into the Record of Significant Findings and Action Plan that he produced for us on 26 April 2016 [which you exhibit] ... Specifically, he recommended weekly occupier inspections of the ventilation system with the results recorded. Neither of these two documents contained any suggestion by Carl Stokes that the AOV system was of an inadequacy of non-compliance."

Now, if we look at the 26 April 2016 update to his FRA significant findings and action plan, let's have a look at that, that's at {CST00003098}. We can see there's the date, 26 April 2016, on page 1.

If we go to page 5 {CST00003098/5}, you will see item 19b, towards the foot of your screen, red, high:

"There are no operating instructions or as installed diagrams located next to the automatic opening ventilation (AOV) control panel, how is this control panel accessed?"

Then "Actions to be taken":

"Provide operating instructions and as installed diagrams located next to the AOV control panel along

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with access information."

Then there is more, 19c:

"It is not known if training on the operating of the AOV system has been given to all TMO staff who requires it."

And there is a recommendation on that.

Over the page {CST00003098/6} at 19e:

"There is an AOV in the area outside of the ground floor electrical room, how is this AOV activated as there is no smoke detector in this area?"

19f:

"Are the AOV system and the installed fire alarm systems in this building remotely monitored?"

And recommendations about that.

If you turn to page 8 {CST00003098/8}, 23g, red, high:

"Are the weekly occupier's tests of the buildings automatic smoke ventilation system being undertaken?"

With a recommendation that they should be undertaken weekly, with the results recorded as proof of the inspections having been undertaken.

Now, all of those systems I've read to you are high-priority, red risks, aren't they?

A. Yes.

Q. If we go back to page 5 {CST00003098/5}, first, 19b,

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which I've read to you, and then 19d on page 6

{CST00003098/6}, which I put to you, those were repeated in the June 2016 FRA actions. Do you remember that or can I —

A. Yeah, yeah, that's fine.

Q. Yes. We can see the recommendations in respect of 19b, instructions should be located next to the AOV panel. That's page 5 {CST00003098/5}, if we can just go back to that.

Focusing on that, let's just focus on it, if you go to your statement of 21 August 2020 at {TMO00873934/16}, paragraph 27, you say there:

"In respect of FRA item 19a [that's the June reference] (which corresponds to item 19b in the April 2016 Plan), this item was assigned to myself ... The 'action taken' column of the referenced tracking spread sheet records 'Written instructions provided — diagram within Hub Room on site. (Hub room accessed via key stored in keysafe installed in bin room — accessed via FB14 key)."

Can you explain what it was that was provided in the hub room?

A. I don't think I can, other than what it says here, because this would have been allocated initially to Claire, but there was quite a volume of things, so we

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would have sat down and anything that she could

confidently confirm was in place, I took as much information from her so she could go ahead and escalate the other issues which were outstanding.

My understanding would be that it would be to comply with the requirement, so I would imagine there would be a zone diagram and some written instructions in the hub room, and there had been discussions, I believe, with the Fire Brigade about how they would access the key for the hub room.

Q. Well, did you ensure that there were instructions provided next to the panel as Mr Stokes had recommended?

A. No, I — Claire ensured and I then just entered the update. So I didn't personally go there and check, but she did, that's my understanding.

Q. So I don't understand. When you say in your statement, "this item was assigned to myself", what does that mean?

A. It was assigned — okay. So, as you said, there was quite a lot of information being sought. Mostly — it's coming to the end of Rydon's contract, so we're trying to get as much information in order to complete these as possible. So it was assigned to me because when it came in, Claire and I went through all of the actions and identified what she still needed information from Rydon's or planning or building control or whatever, and then

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1 some that she was confident that she could resolve quite
 2 quickly, she went away and did that. I allocated it to
 3 me and I closed it down so she didn't have to do the
 4 administration of it, but I would only close it down
 5 when she'd confirmed that it was in place.
 6 Q. Can you just help me, why did you decide to ignore
 7 Mr Stokes' advice and locate the plans in the hub room,
 8 rather than next to the control panel?
 9 A. No, actually, I can't help you, sorry. I've no idea.
 10 I don't —
 11 Q. Right. Did you tell the LFB local crews or the LFB
 12 fire safety team where the instructions and keys were?
 13 A. My understanding is that the project team told the local
 14 crews and the local station manager, because it would be
 15 them who would need that information, and then also
 16 I know that there were briefings with said crews around
 17 this time or maybe slightly later where they had the
 18 opportunity to be shown this aspect of what we had done
 19 and to raise any questions or challenges.
 20 Q. Now, if we go to {TMO10033004}, we can see an email from
 21 Dave Hughes of Rydon at the top there on 5 July to
 22 Claire Williams:
 23 "Hi Claire
 24 "Copy of 'simple guide to AOV system' as requested."
 25 Do you see that?

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1 A. Yes.
 2 Q. Let's go to the attachment. It's at {TMO10033005}.
 3 This is the attachment.
 4 If you look at it, it's called:
 5 "Grenfell Tower — smoke extract system.
 6 "Basic how to use guide when activated."
 7 Did you see this guide at the time?
 8 A. Possibly.
 9 Q. Did you take any steps to make sure that it was
 10 accessible to fire crews attending the tower in the
 11 event of a fire?
 12 A. Well, as I've just stated, it was my understanding that
 13 the project team, Claire and Rydons, in their regular
 14 dialogue with the operational crews covered this, showed
 15 them where it was, and then when Rydons did
 16 a familiarisation, this would have been definitely on
 17 their radar.
 18 Q. Did you take any steps to make sure that the LFB crews,
 19 whether they were local crews or the fire safety team,
 20 read this document, understood it and judged whether it
 21 was sufficient for their purposes?
 22 A. No, not specifically, but, as you know, we were having
 23 regular dialogue, and the station manager was still
 24 coming to the liaison meeting, so any concerns — and
 25 Grenfell was a standing item. Any concerns, any issues,

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1 there was plenty of opportunity to raise them.
 2 Q. Do you know where this document was placed within the
 3 building?
 4 A. Well, it says the hub room, so that's my understanding.
 5 Q. This document went into the hub room, did it?
 6 A. I know what I was told. I didn't go and look at it
 7 first hand. So that's my understanding.
 8 Q. Can we go to {TMO00831144}, please.
 9 This is a full mechanical operation and maintenance
 10 manual, O&M, provided by JS Wright. That's page 1 of
 11 what is a very long document indeed —
 12 A. Okay.
 13 Q. — comprising lots of different documents within it.
 14 Have you seen it before?
 15 A. No.
 16 Q. You've never seen this document?
 17 A. No, I don't believe so.
 18 Q. Can we take it that you didn't provide this manual to
 19 the LFB yourself?
 20 A. No, I really don't think I've ever seen it, so no,
 21 I didn't.
 22 Q. Do you know whether it was provided to
 23 Allied Protection, who were the maintenance contractor
 24 for the AOV come 2016?
 25 A. Again, I wouldn't know that, that would be between

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1 Claire and Alex, and I wouldn't necessarily be party to
 2 any conversations.
 3 Q. Right. Can you tell us whether it would have been
 4 accessible to TMO employees?
 5 A. If — I think any employees who would have needed it
 6 would have gone to Claire or to Alex and asked the
 7 question. But I don't know. I don't know where it
 8 would have been stored. Sorry, I really don't think
 9 I've ever seen it before.
 10 Q. Right.
 11 Let's move to October 2016.
 12 Can we go to {CST00003137}, please. This is
 13 a letter dated 19 October 2016 from Carl Stokes to you.
 14 The subject is Grenfell Tower, and he starts by saying:
 15 "Thank you for asking me to inspect this building
 16 before an audit of the premises is undertaken by the
 17 London Fire Brigade under The [RRO] next week.
 18 I visited the building yesterday and as a result of my
 19 visit I would recommend that the following items are
 20 addressed or information obtained to assist the London
 21 Fire Brigade Inspecting Officer."
 22 Then he refers to his 20 June 2016 FRA.
 23 So is it right that you had asked Mr Stokes to visit
 24 Grenfell Tower ahead of an audit to be undertaken by the
 25 LFB?

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1 A. I must have done, yes.
 2 Q. Why was that? The reason I ask why is that he'd only
 3 completed his FRA four months before that on 20 June.
 4 A. I think it was something that I'd been instructed to do
 5 by Peter Maddison several years prior, that where we
 6 were having buildings audited, we really should do our
 7 own checks in the first instance. So I think that's why
 8 I did it.
 9 Q. I see. Was it a standing practice then of the TMO that,
 10 whenever there was an audit of a building in your stock,
 11 you would send in Carl Stokes beforehand to pick up any
 12 potential deficiencies?
 13 A. No, because generally we didn't know in advance, it was
 14 just that's what I'd been instructed to do, that where
 15 we knew in advance there was going to be an audit by
 16 anybody, we should do our own checks.
 17 Q. Right.
 18 A. But, as I say, it was rare for us to know in advance
 19 that they were visiting, and if they were, sometimes
 20 I would just meet them on site, and if it was imminent,
 21 then I wouldn't obviously go to this extent. We
 22 wouldn't stall their visit in order to do this. It was
 23 just that where it was some time hence, I'd been
 24 instructed that that's what I needed to do.
 25 Q. Were you specifically instructed by anybody to instruct

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1 Carl Stokes in turn to visit Grenfell Tower on this
 2 occasion?
 3 A. Not on this occasion, just as a general rule.
 4 Q. Right. And you say it was Peter Maddison who issued
 5 that general rule, was it, or was it —
 6 A. It was some time previously, I think shortly after —
 7 I think we spoke about this. It was shortly after Peter
 8 had just started, and I had provided a copy of a fire
 9 risk assessment with information about unserviced
 10 extinguishers, and he felt it was important for us to do
 11 our own checks before we issued documentation.
 12 Q. I think that was February 2013, wasn't it?
 13 A. I think it may have been, yes.
 14 Q. Okay.
 15 Now, if we go to page 11 {CST00003137/11}, please,
 16 we can see that he refers to some items from his
 17 June 2016 findings that were still outstanding, and this
 18 is in the middle of that list, can you see? But at 23g
 19 he asks:
 20 "Identified risk or hazard.
 21 "Are the weekly occupier's tests of the buildings
 22 automatic smoke ventilation system being undertaken?"
 23 Do you see that?
 24 A. Yes.
 25 Q. Would you agree that he had been recommending weekly

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1 checks of the AOV since his fire risk assessment in
 2 April 2016? We looked at that earlier.
 3 A. Yeah.
 4 Q. Item 23g.
 5 A. Agreed, he had.
 6 Q. And it was something also recommended in his
 7 20 June 2016 FRA, again as item 23g.
 8 A. Yes.
 9 Q. So it was a recurring item there.
 10 So is it right, then, for us to conclude that these
 11 checks hadn't been implemented, despite Mr Stokes
 12 raising them twice in two separate FRAs as action items?
 13 A. That seems — well, that seems to be the case.
 14 Sometimes Carl words things where he's looking for
 15 confirmation that they're in place, it isn't saying
 16 they're not in place but can it be confirmed, it's just
 17 the way he words things, so — but it does appear to
 18 still be outstanding, or he's still asking for
 19 confirmation whether they're in place.
 20 Q. To be fair to you, there is a little bit of prior
 21 history to this and I'll show it to you.
 22 Can we go to {TMO00873934/11}. This is your
 23 August 2020 witness statement —
 24 A. Okay.
 25 Q. — where you've set out very helpfully in grid form the

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1 item in the significant findings schedule for June 2016.
 2 If you go to line 23g, you can see that you set out
 3 there:
 4 "Weekly occupier inspections of the buildings smoke
 5 ventilation system should be undertaken, with the
 6 results recorded as proof of the inspections having been
 7 undertaken."
 8 A. Yes.
 9 Q. That's the recommendation, I'm sorry.
 10 Then if we go to paragraph 31 of your statement on
 11 page 17 {TMO00873934/17}, we can see your reply there in
 12 respect of 23g.
 13 A. Okay.
 14 Q. You say at paragraph 31:
 15 "In respect of item 23g, this item was assigned to
 16 Nicola Bartholomew ... A note had been added to the
 17 'action' column which stated 'Can you confirm that Paul
 18 is undertaking these please?' In the 'action taken'
 19 column, it is recorded 'tested weekly on Fridays.' This
 20 action was fully completed by 13 March 2017. In
 21 a subsequent FRA tracker, a further comment has been
 22 added 'tested weekly on Fridays — [inspection] record
 23 [supplied]' ... "
 24 Then you attach a document, which is the W2 record
 25 confirming that.

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1 Now, I have shown you that in your statement because
 2 you have very helpfully brought all of the history
 3 together there.
 4 Looking at what you say in paragraph 31, what did
 5 you mean by "fully completed"? You say "This action was
 6 fully completed by 13 March 2017". What did you mean by
 7 "fully completed"?
 8 A. It must have been fully completed on the W2 system at
 9 that point in time, which is a significant delay, and —
 10 yeah, that's usually what I mean, is it's fully
 11 completed on the W2 system. Up until that point it was
 12 either outstanding or partially completed.
 13 Q. 13 March, was that the date when you were told about
 14 completion, or the date which the W2 system shows as the
 15 completion date?
 16 A. It must be the date that the W2 system shows as
 17 completion, but — so it would have been completed and
 18 then sent back to our inbox, but we would usually be
 19 really prompt at closing them down. So it's usually
 20 a fairly good reflection of when I've been advised that
 21 it's been completed.
 22 Q. Do you know when Nicola Bartholomew instructed
 23 Paul Steadman, who was the ESA, to carry out these
 24 checks?
 25 A. I don't, I'm sorry.

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1 Q. Right.
 2 A. It may be that there was a training aspect that he
 3 wanted to be more confident about specifically what he
 4 was — what the check entails, although I anticipate
 5 that it was largely visual, but I don't know, I'm
 6 sort of speculating.
 7 Q. Can we assume from what we've seen so far that because
 8 Carl Stokes had raised this question again in his letter
 9 of 19 October 2016, at least by that date these weekly
 10 checks had not yet been implemented?
 11 A. That seems to be the case, judging by this closure.
 12 Q. Can you explain why that is so?
 13 A. No, I can't. As I've said, there may have been
 14 a training aspect, where Paul may have sought or
 15 required additional training, but again, that would be
 16 something that could normally be put in place quite
 17 swiftly, so I can't give any explanation.
 18 Q. Are you able to tell us when it was that Paul Steadman
 19 did start to test the AOV system weekly?
 20 A. No. They should be on his regular checks, so there
 21 should be a —
 22 Q. Did you yourself ever check that he was testing the AOV
 23 system weekly?
 24 A. I must have — I must have been in dialogue with Nicola,
 25 and Nicola worked on site and at that stage supervised

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1 Paul, so I was confident that what she said was
 2 accurate.
 3 Q. Right. But it was your responsibility to make sure,
 4 supervising Nicola Bartholomew, that these weekly checks
 5 were being carried out, whether by Paul Steadman or
 6 anybody else on site?
 7 A. Yes, but he is managed by — he is not managed by me, he
 8 is managed by people who are on site and can speak to
 9 him and can supervise what he is doing.
 10 Q. Given that this was an FRA item for which you had
 11 responsibility and given your role as a competent
 12 person, do you accept that it was your responsibility to
 13 check that weekly inspections were being carried out
 14 on site?
 15 A. I don't accept that I can supervise every single action
 16 and the completion of every single action on site
 17 because I just wouldn't have had the capacity to do
 18 that. The people who were actioning these were very
 19 often managed by very competent people, and to some
 20 extent I had to rely on what I was being told. Not
 21 across the board, but I wouldn't have had capacity to
 22 check every single on-site action.
 23 Q. Going back to the question of trying to date when it was
 24 that weekly inspections did start, can we go to
 25 {MET00065673}.

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1 This is a report, I think, called:
 2 "Estate service monthly checks at Grenfell Tower.
 3 "16 November 2016 (note defects period runs until
 4 4 July 2017)."
 5 Is this document familiar to you?
 6 A. No, not at all.
 7 Q. Can you tell us what it is? It's a document that was
 8 produced by Paul Steadman as part of his police
 9 statement. Have you not seen it before?
 10 A. Sorry, no, I've never seen it before. I've no idea what
 11 it is, apologies.
 12 Q. Do you know who did draft this document or who would
 13 ordinarily have drafted it?
 14 A. It obviously relates to works that were undertaken as
 15 part of the major works, so I don't know if it's
 16 something that Claire Williams or Claire Williams in
 17 association with Rydens — I'm — I would assume it was
 18 one or other of that, because it seems quite specific,
 19 doesn't it?
 20 Q. Now, we've looked at this document and it does not
 21 appear to us to cover testing the environmental function
 22 of the AOV. Now, was that something that you were aware
 23 needed to be carried out, testing of the environmental
 24 function of the AOV?
 25 A. I can't actually recall. I remember that at the

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1 conclusion of the work there was quite a significant
 2 amount of checking that needed to be done at varying
 3 frequencies, which Claire produced, and my understanding
 4 was that training and — had been put in place. Some of
 5 it was going to be undertaken by contractors and some by
 6 staff. I didn't really delve into the detail because
 7 between the estate services teams and Claire and Rydons
 8 and contract management, my understanding was it was in
 9 place, but ... yeah, sorry.

10 Q. If we go to page 6 {MET00065673/6}, we can see at the
 11 top of page 6 that it says:
 12 "Weekly — the TMO need to check that the smoke
 13 ventilation system is working. This entails ringing
 14 Tunstall ..."

15 Does this tell us, even approximately, the date when
 16 weekly testing of the AOV started, or at least should
 17 have started?

18 A. It should have started when it was commissioned and
 19 handed over, but there may have been a delay in terms of
 20 training, but then it should have started.

21 Q. Does this document give us a date when we can be
 22 reasonably sure that it had not yet started?

23 A. Sorry, I don't know, I —

24 Q. You don't know. All right.

25 Can we go to {CST00000068}, please.

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1 This is a document we've looked at before. This is
 2 the weekly health and safety checks spreadsheet for
 3 Grenfell Tower. We'll need the native version of it.
 4 We saw this last week, Ms Wray.

5 If we go to cell B6, you can see that there are
 6 weekly ESA checks between 1 January 2016 and
 7 14 June 2016. Now, we don't see anything there for
 8 weekly tests of the AOV. If you look across, we can't
 9 see that.

10 Do you know how Paul Steadman would be expected to
 11 document his findings of the weekly AOV testing at
 12 Grenfell if it wasn't included on this spreadsheet?

13 A. I don't. The sensible thing would have been to add it
 14 to the spreadsheet and —

15 Q. Yes. Do you know why it wasn't?

16 A. No, I don't. I think if Nicola was still his manager,
 17 I feel sure that she could have liaised with the IT team
 18 in order to have it added. But I don't.

19 I mean, she clearly was ensuring that it was
 20 happening, so there must have been some way of checking
 21 on whether — how Paul was recording it. But I don't
 22 know what that is. I wasn't party to the discussion,
 23 sorry.

24 Q. Do you know what training was given to Paul Steadman in
 25 relation to the AOV system?

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1 A. That would really be a question for Claire. Rydons did
 2 provide familiarisation and I think then subsequent
 3 additional training if it was required, but I don't have
 4 the detail of it.

5 Q. What about Seamus Dunlea, the handyman? Did he ever get
 6 any training on the AOV system at Grenfell Tower, or
 7 even generically?

8 A. I would have thought similar to Paul, really.

9 Q. Now, let's look at a slightly different topic, which is
 10 the inspection and maintenance of the new AOV itself.
 11 Dr Lane has summarised her opinion about the
 12 inspection and maintenance requirements applicable to
 13 the new AOV in chapter 7 of her report. I think I can
 14 summarise it quickly by a reference: paragraph 5.9.109
 15 at {BLARP20000033/106}.

16 She says that the minimum maintenance steps include
 17 weekly, monthly, quarterly, six—monthly and annual
 18 inspections; do you agree with that?

19 A. I'm sure she's better qualified than me to comment.
 20 I wouldn't know that off the top of my head. I could
 21 find out easily, but I'm not an engineer.

22 Q. Take it from me that the completion certificate for the
 23 new AOV certificate was dated 3 May 2016, and we make
 24 that good by reference to the document {TMOM00001862}.

25 There is no need to turn it up.

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1 Are you able to explain what the maintenance regime
 2 was that was put in place for the new AOV?

3 A. I'm not.

4 Q. You're not?

5 A. My understanding was they would still have been under
 6 defects for at least a 12—month period and, therefore,
 7 I would have expected any of the more technical
 8 inspections and servicing and maintenance visits to be
 9 undertaken. So my expectation would be that the
 10 quarterly, the six—monthly, the annual, all of those
 11 would be done by possibly JS Wright, if they were the
 12 appropriate contractor. We've already identified that
 13 the assessor is also asking for weekly inspections and
 14 I believe that the monthly would also have been done by
 15 the estate staff, but I couldn't definitively say.

16 Q. Now, the first inspection or servicing we've got on
 17 record by Allied Protection relating to the new AOV
 18 system was carried out on 17 January 2017.

19 A. Okay.

20 Q. That's eight months after it was installed. There is
 21 a reference to that, which is {LAK00000009}. There is
 22 no need to turn that up.

23 Are you able to explain why there was such
 24 a significant gap in the contractor's inspection or
 25 maintenance visits?

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1 A. No, I'm sorry, I'm not. I wasn't even aware of that
 2 until you've just advised. It would have been — so the
 3 contract team were managing the project. At the end of
 4 the project, any plant maintenance that has to transfer
 5 immediately over, they would have to go via the contract
 6 management team. So there would have been discussion
 7 between those teams without me being party to them.
 8 Q. Can you explain why you weren't party to them? Given
 9 that you were the competent person and were always the
 10 competent person for Grenfell under the RRO, why wasn't
 11 the continuing maintenance and inspection regime for the
 12 AOV passed to you upon completion so that you could take
 13 charge of it?
 14 A. Because we have a dedicated team doing planned
 15 preventative maintenance, and that's their core job and
 16 what they do. You're right, I've got oversight,
 17 ideally, but I couldn't be responsible for taking
 18 forward the maintenance. We have a team, a dedicated
 19 team, who are doing that, and we have a team who know
 20 exactly what they've installed and have all the O&M and
 21 all the records. It seems logical for them to pass the
 22 information over and for them to have dialogue.
 23 I think if I had a bigger team then I would have
 24 more of an input into that, but I trusted them to
 25 discuss with each other and put in place what was

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1 appropriate.
 2 Q. Yes, I see that, but my question is slightly different.
 3 Given that you were the competent person and held,
 4 effectively, ultimate responsibility operationally for
 5 health and safety over the TMO's stock, can you explain
 6 how you were not aware that there was an eight-month gap
 7 between installation and what appears to be the first
 8 recorded inspection or servicing of the AOV system?
 9 A. I can't, not without going back to colleagues in
 10 contract management because, as I say, that was their
 11 dedicated role, to manage those contracts, manage those
 12 contractors, make sure they performed, ensure that
 13 remedial works are put in place as and when required,
 14 put in place interim measures. I was having regular
 15 dialogue, regular meetings with Alex. It was not
 16 brought to my attention, and I did not have enough time
 17 to go delving into their service records.
 18 Q. No, I understand why you might not have had time to look
 19 at the granular detail of the service records
 20 themselves, but surely you either did have time or
 21 should have made time simply to ask the question, "There
 22 is a new AOV I know went in at Grenfell eight months —
 23 it's been some time, has it been maintained?" Did you
 24 ask that question?
 25 A. I can't remember asking that question, but I did —

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1 I was confident that the responsibility had been passed
 2 across to the appropriate people. They knew what their
 3 role was and, if they needed any further information,
 4 they had access to the specialist contractors, the
 5 design and build contract, the contracts manager. So,
 6 to the best of my knowledge, all of those processes and
 7 all of that dialogue was taking place. I wasn't party
 8 to the detail of it, but to the best of my knowledge,
 9 that was what was in place.

10 As you say, everybody knew that a new AOV system had
 11 been installed. The contracts management team had had
 12 some dialogue with the contracts team, knew that the
 13 project was coming to an end and knew that — must have
 14 been preparing, I thought, to take over that particular
 15 responsibility and make sure that their contractors were
 16 also geared up for it. It would have had to be added to
 17 contracts — there would have been all sorts of things
 18 that would have been needed to be put in place and it
 19 was my understanding that they were being put in place.

20 Q. What gave you to understand that? Did somebody tell you
 21 that these very regular inspections were happening or
 22 did you just make that assumption without asking the
 23 question?

24 A. I met with the head of contracts management on, I think,
 25 maybe a two or three—weekly basis. There might have

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1 been quite a wide-ranging agenda, there might have been
 2 20 different things that we were speaking about, but
 3 there were always opportunities to discuss any issues,
 4 any contractor issues, anything that was outstanding,
 5 anything that had to be brought to my attention.
 6 Equally, if I had had anecdotal comments about the
 7 performance of contractors, that was my opportunity. So
 8 we had quite full and frank discussions. I can't
 9 remember specifically asking the question that you've
 10 put to me, but ... I shouldn't have needed to.
 11 Q. That may be, but it's a question of responsibility, and
 12 I'm just trying to identify whether it was you who was
 13 responsible ultimately for making sure that these
 14 regular maintenance and inspection and servicing took
 15 place.

16 A. I don't think it was.

17 Q. Whose was it then?

18 A. I mean, I think it's clear from our health and safety
 19 policy statement that the contracts management team
 20 manage/monitor the systems that we have in place,
 21 procure the contractors, ensure they get competent
 22 advice to ensure that the levels of checking are exactly
 23 what they should be. All of that sits with that team.

24 I have dialogue with them, and, in an ideal world,
 25 I would have done more delving down into the granular

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1 detail. But they were competent to do that role and
 2 that should have been their role.
 3 Q. But I'm just trying to understand this, because the
 4 contracts management team, as you say, manage and
 5 monitor the contracts. But you're in charge of health
 6 and safety, so wasn't it your responsibility to manage,
 7 supervise and monitor the contracts team so as to make
 8 sure that whatever it was that the contracts team were
 9 doing, they produced the goods in terms of compliance
 10 with the RRO?
 11 A. There were about six people in the contracts team all
 12 managing very specific contracts. The contracts team is
 13 also building up KPIs, sits on the health and safety
 14 committee, where they also report in to, so lots of
 15 opportunities not just for me to meet with the head of
 16 on a regular basis, but for them to raise issues, for
 17 them to feed back on performance of contractors.
 18 I don't think you can take away their responsibility.
 19 I think ... sorry.
 20 Q. I'm not suggesting that they're not responsible. What
 21 I'm trying to get to the bottom of is how you saw your
 22 responsibility in relation to theirs.
 23 A. My responsibility was to keep a degree of oversight of
 24 what they were doing, be aware of where there were
 25 interim measures, where there were failing contractors,

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1 what we were doing to mitigate risks, what's coming
 2 along on the highway, any areas of non-compliance, how
 3 are we addressing those, how are we getting on with
 4 KPIs, when are we going to have fire safety KPIs, what
 5 have we got on Keystone, who's got access to it, all of
 6 that, which is why I would meet with the head of
 7 contracts management, and they sat on the health and
 8 safety committee, and before that there was the
 9 operations group. There were lots of opportunities for
 10 dialogue so that I could start to get the detail of what
 11 I needed.
 12 But it's a big amount of work. It's a big remit
 13 and, within that, I was trying to focus on the things
 14 that I thought were the most important.
 15 Q. So it was a question ultimately of your prioritising
 16 things you thought were the most important in exercising
 17 the degree of oversight that you had?
 18 A. To some degree it had to be, because there was a finite
 19 amount of time and a vast amount of work, so that was —
 20 I was trying to make the two marry up.
 21 Q. I see.
 22 Well, in light of that helpful explanation, coming
 23 back to my question, are you able to explain, given the
 24 degree of oversight you had and the way you prioritised,
 25 why it was that an eight-month gap was allowed to open

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1 up between the installation of the AOV system and its
 2 first recorded inspection or servicing in January 2017?
 3 A. And I have to give you the same answer: I don't know the
 4 answer to that, but if you had the head of contracts
 5 management here, he could probably tell you, because
 6 there were probably a lot of other factors that neither
 7 you or I are aware of that would contribute. Sorry.
 8 SIR MARTIN MOORE—BICK: Well, Ms Wray, I think the only
 9 question Mr Millett is asking you to focus on is: were
 10 you aware that there was the eight-month gap, and if
 11 not, why not?
 12 A. Yeah, I appreciate that. No, I wasn't aware, and
 13 I can't really add anything more to the explanation
 14 I have tried, obviously badly, to put together.
 15 SIR MARTIN MOORE—BICK: That's all right. Thank you.
 16 MR MILLETT: Now, let's just finish off quickly on this.
 17 I'll give you two dates. The next service visit for
 18 the AOV was 13 April 2017. That couldn't go ahead
 19 because Paul Steadman wasn't on site, so the next
 20 service visit was 15 May 2017. Dr Lane has concluded
 21 that the frequency of inspections, four months apart, is
 22 substantially less than that required by the relevant
 23 British Standards. That's paragraph 19.6.24 at
 24 {BLARP200000033/467}.
 25 What steps, if any, to your knowledge, did the TMO

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1 take to make sure that the AOV system maintenance
 2 arrangements through external contractors was compliant
 3 with the British Standards as applicable?
 4 A. Again, I can't answer that. Contracts managers would be
 5 able to answer that comprehensively, because they know
 6 who they sought advice from, what information they
 7 received from the specialist contractors, when they
 8 received it, what the O&M manuals — they had access to
 9 all of that, but I didn't, so I can't answer it.
 10 Q. Are you able to tell us whether the TMO put in place any
 11 defined procedure for the maintenance of the new AOV
 12 system once it was installed?
 13 A. I can't, no.
 14 Q. And you can't because — is this the same reason as
 15 before: it was someone else's job?
 16 A. Well, yes, because it was managed by contracts
 17 management, yes.
 18 Q. But not overseen by you?
 19 A. Not to that level of detail, no.
 20 Q. You say not to that level of detail; with great respect,
 21 it's not a level of detail to put in place a policy or
 22 a procedure or a protocol for the maintenance of a new
 23 AOV system in a large residential high-rise, is it?
 24 It's not a level of detail.
 25 A. It's a level of detail I would expect the contract

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1 manager to work with the contractor to agree exactly
 2 what they're doing, when they're doing it, agree
 3 a programme, agree the extent of the checks that they're
 4 doing and when they're doing it. It's not a level of
 5 detail that I would normally be involved with. I'm not
 6 a contracts manager and I have, you know, some technical
 7 knowledge, but limited, so it's not something that
 8 I would feel it was for me to lead on.
 9 Q. Not for you to lead on, but for you to have any
 10 oversight on?
 11 A. I would expect it to happen, and I would have liked to
 12 have been involved in what was agreed, but I wouldn't
 13 always be, because it's not the only building and it's
 14 probably not the only bit of specialist kit.
 15 Q. Lifts, if we can go to that, next topic.
 16 Can I start by getting into the question of the
 17 definitions, Ms Wray, about lifts, firefighting lifts,
 18 and I want to look specifically at Grenfell Tower.
 19 Can we look at your evidence on 9 June this year,
 20 last Wednesday, and I'll summarise it, and if I get this
 21 wrong we can look at the transcript. It's
 22 {Day142/93:22-25}, for our own references.
 23 Do you recall that I put Carl Stokes' letter of
 24 23 June 2010 to you, {CST00001887}, and you said that
 25 there was a point of dispute, disagreement, between

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1 Mr Stokes and you, and you said:
 2 "I was very clear that they were not firefighting
 3 lifts or evacuation lifts, and discussions with my then
 4 senior lift engineer had clarified that."
 5 You remember that evidence?
 6 A. Yes.
 7 Q. And you also clarified that Robin Cahalarn was that lift
 8 engineer.
 9 A. That's right, Robin Cahalarn.
 10 Q. Yes.
 11 You also went on to say, {Day142/94:1-5}:
 12 "And that had been conveyed to Salvus and was
 13 discussed with Mr Stokes, but he was — remained utterly
 14 convinced that they were firefighting lifts and so
 15 insisted on still describing them in that way."
 16 That was your evidence last week.
 17 A. Yes.
 18 Q. Drawing the threads together, can we agree that
 19 Carl Stokes repeated in every FRA he did for
 20 Grenfell Tower between 2010 and 2016, twice in 2016,
 21 that the two lifts at Grenfell Tower were
 22 firefighting/evacuation lifts?
 23 A. He did, yeah.
 24 Q. And, therefore, that those lifts could be used for
 25 evacuating residents from that building in the event of

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1 a fire?
 2 A. That's what he said, but as I also said last week, we
 3 were never going to use them in that way.
 4 Q. Now, do you agree also that in 2010 you and
 5 Robin Cahalarn, the TMO's lift engineer, created the
 6 TMO's own definition of a firefighting lift?
 7 A. Yeah, I don't think we meant to create a definition.
 8 We — Salvus had asked specific questions about the —
 9 how — what kind of lifts we had, basically,
 10 particularly above—18—metre blocks, and I met with Robin
 11 and Robin attended a progress meeting with Salvus, and
 12 I think in discussion with Salvus, they felt it would be
 13 helpful to outline which of the criteria they did meet,
 14 and I think that was all we were trying to do, was
 15 clarify. So it wasn't meant to be defining, it was just
 16 meant to be saying: okay, our lifts don't meet the full
 17 requirements of firefighting/evacuation lifts; however,
 18 they do meet X, Y and Z.
 19 Q. Yes.
 20 Let's go to that progress meeting, then, in light of
 21 that, and if this is not the one, tell me.
 22 {SAL00000042}. What I'm showing you is the minute of
 23 a progress meeting for fire risk assessments in
 24 high—rise blocks — sorry, high—risk blocks, I'm sorry,
 25 although I think they're the same.

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1 A. Yeah, I think I meant high—rise.
 2 Q. 23 February 2010. Do you see that?
 3 A. Yes.
 4 Q. We can see that you're there, Andrew Furness is there,
 5 Adrian Bowman, and also Robin Cahalarn —
 6 A. Yeah.
 7 Q. — for part of the meeting, and apologies from others,
 8 including Ann Muchmore.
 9 If we go to page 1, a little bit lower down, you can
 10 see the subject of lifts is discussed, and I'll just
 11 read it to you. It says this:
 12 "Robin Cahalarn, TMO Lift Engineer, attended for
 13 this item. Janice advised that a number of the FRA
 14 Action Plans had raised specific queries in relation to
 15 lifts and these had been referred to Robin who was
 16 seeking confirmation from Salvus that his interpretation
 17 of what constitutes a 'fire fighting lift' is the same
 18 as theirs. The specific points from the action plans
 19 were as follows ..."
 20 Then they're set out in the box there.
 21 Then after that, it says:
 22 "RC then outlined the 3 different classifications of
 23 lifts in terms of fire — Firemans Lift, Firefighting
 24 Lift and Evacuation Lift. After some discussion the
 25 group concluded that most of the Borough's lifts meet

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1 the majority (but not all) of the criteria which define
2 a firefighting lift. It was agreed that, for the
3 purposes of the Action Plans, JW [you] and RC
4 [Robin Cahalarn] would document the criteria that TMO
5 lifts do meet. RC clarified that the requirements for
6 lifts below a certain size are less onerous and so these
7 lifts are less likely to comply with a significant
8 number of these criteria.

9 "Action: RC & JW to document the criteria that the
10 TMO's fire fighting lifts meet and advise Salvus so that
11 this can be included in future Action Plans."

12 First, can you explain what specific queries had
13 been raised about the lifts in the FRA action plans?

14 A. I think it's these three points that we've — he's
15 recommended. These were coming up regularly in the
16 significant findings and action plans and we were trying
17 to be clear about how they should be addressed.

18 Q. Right. Those are the confirmations, or rather the
19 recommendations, because they're the action points to be
20 taken away. What I'm really after is the concerns that
21 had given rise to them.

22 Let's go to {CST00000631}. What I'm going to show
23 you is the FRA which Carl Stokes completed for
24 Grenfell Tower on 30 September 2009 while he was still
25 working at Salvus. There it is.

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1 If we go, please, to page 14 in that document
2 {CST00000631/14}, you will see item 9.3. We've seen it
3 before a number of times with other witnesses:

4 "Lack of fire fighting lifts installed in the
5 building."

6 You see that?

7 A. Yeah.

8 Q. Then:

9 "It could not be confirmed at the time of the fire
10 risk assessment if any of these lifts are fire fighting
11 or evacuation lifts."

12 Was that one of the specific queries?

13 A. Yes.

14 Q. Right.

15 Then if you go to the action on page 18
16 {CST00000631/18}, this is where we see the
17 recommendation which is reflected in the box on the
18 first page of the progress meeting minute we've just
19 been looking at. This is the action related to 9.3,
20 first action:

21 "It is recommended that TMO confirms if any of the
22 lifts installed in the building are either fire fighter
23 or evacuation lifts."

24 That had an amber colour, which meant that it's best
25 practice or guidance; yes?

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1 A. Yes.

2 Q. So can we take it that from September 2009, you knew
3 that Grenfell Tower lifts were not firefighting lifts,
4 or, at the very least, it was not clear that they were?

5 A. Salvus are asking the question, and the minutes that
6 we've just discussed and the meeting that took place was
7 me trying to clarify exactly what we had where, and
8 that — yeah. So from — certainly from February I knew
9 that was the case.

10 Q. Yes.

11 Were you advised by anyone from Salvus that the
12 lifts at Grenfell Tower should have been firefighting
13 lifts?

14 A. No, I don't recall so.

15 Q. You don't?

16 A. No.

17 Q. Can you explain the discussion that was had at this
18 meeting about the lifts, particularly the criteria that
19 they did meet? We can go back to the note if you like.

20 A. I'm not sure I can add much to the note. I mean, the
21 list of the criteria that we were confident that they
22 did meet has been included in various policies and
23 whatever, strategies.

24 Q. Yes.

25 A. So I think we — Robin outlined the main things that he

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1 was confident that they met. He was very keen to point
2 out that they didn't have a hatch, a roof hatch in the
3 car, and obviously other issues, but I don't think we
4 went into more detail really than what we'd outlined.

5 Q. Why was it decided that you and Robin Cahalarn would
6 document the criteria that the lifts did meet?

7 A. As I say, in discussion with Andrew Furness, he seemed
8 to think that that was a wise way of approaching it, so
9 I would have — Robin would have outlined them and
10 I probably just would have been the scribe who put them
11 together.

12 Q. Was the goal here that you could avoid upgrading the
13 lifts to firefighting lifts?

14 A. No, it was to clarify — we were asked to confirm if —
15 what they are, we're confirming what they are, and we're
16 trying to go a bit further and explain what that means.

17 Q. Can we go back to the note of the meeting, please, at
18 {SAL00000042}, towards the bottom of the page. You can
19 see the action point.

20 A. Yeah.

21 Q. You describe the lifts as "the TMO's fire fighting
22 lifts", don't you?

23 A. I always put it in speech marks when I — so that it's
24 quite clear that they're not firefighting lifts.

25 Q. Well, you don't here, do you? At the foot of the page,

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1 I'm looking at the action point:
 2 "RC & JW to document the criteria that the TMO's
 3 fire fighting lifts meet ..."
 4 A. Not there, but that follows on.
 5 Q. So not always. But my question isn't about punctuation.
 6 Why did you use the expression "fire fighting lifts"
 7 there at all? Why not say "TMO's lifts"?
 8 A. Well, that's what I should have said.
 9 Q. Yes, but why didn't you? There is a reason for that.
 10 A. No, no, there's nothing sinister, I just have a lot of
 11 notes to do and I obviously didn't do those as
 12 meticulously as I should. There was no — you know,
 13 it's quite clear from the discussion. I'm not trying to
 14 pretend that they were firefighting lifts because it was
 15 always my understanding from this point in time that
 16 they weren't.
 17 Q. Right. So can we then take it that you accept that that
 18 note is incorrect to the extent that it describes the
 19 lifts as firefighting lifts?
 20 A. The action point is, yes.
 21 Q. The action point.
 22 Now, after this meeting, do you remember you emailed
 23 Andrew Furness with the information about the TMO's
 24 lifts? {CST00003102}, where we see the email.
 25 Do you remember this email? It's 3 March 2010.

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1 A. Yes, I think so.
 2 Q. If we go to the foot of the page, which is where we see
 3 the email, it's copied to, among others,
 4 Adrian Calaharn(sic):
 5 "Andy
 6 "Further to the discussion at the recent progress
 7 meeting Robin and I have put together the following
 8 information which relates to the TMO lifts serving
 9 blocks over 18 meters[sic] in height —
 10 "1. Minimum car size ..."
 11 And you set out the definition.
 12 Over the page {CST00003102/2}:
 13 "Andy — Robin's colleague is currently going
 14 [through] the asset register to identify the locations
 15 of these lifts.
 16 "2. Dedicated power supply serving lift (3 phase)."
 17 Et cetera, and other things with dedicated power
 18 supply.
 19 "3. 2—way communication on new lifts includes
 20 connection to Customer Service Centre/out of hours
 21 monitoring service when the lift alarm is activated.
 22 "4. Firemans Control Switch fitted."
 23 And you can see the rest of that text:
 24 "5. Lift car and landing doors are composed of
 25 stainless steel [that] is not less than 16SWG thick and

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1 over 2 hours fire resistance."
 2 Do you see that?
 3 A. Yes.
 4 Q. Was it your intention to create with Robin Cahalarn the
 5 TMO definition, in—house definition, private dictionary,
 6 if you like, of a firefighting lift?
 7 A. No, it wasn't. It was our intention to try and be
 8 transparent about what criteria the lifts did meet,
 9 while accepting that they didn't — that they weren't
 10 firefighting or evacuation lifts. We thought that might
 11 be helpful information for the Fire Brigade, because
 12 I subsequently sent this on to Brian Deans, who was then
 13 the borough's fire commander.
 14 Q. Right.
 15 So you have set out here all these features, but you
 16 don't anywhere conclude that, notwithstanding all these
 17 features, they are not to be taken as firefighting lifts
 18 because they are not, do you?
 19 A. This was an email to Andrew Furness after the meeting
 20 where this was discussed at length. He was quite —
 21 sorry, I thought my intro just said that these are the
 22 features which our lifts do meet. He was quite clear
 23 that they weren't. It was explicit that they weren't.
 24 Q. Yes.
 25 A. And ...

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1 Q. Look at his response, then, to make some more sense of
 2 what you have just told us.
 3 Top of page 1, he comes back to you the same day,
 4 a couple of hours later:
 5 "Hi Janice
 6 "Thank you for the information. We will include the
 7 following statement in relation to fire fighting lifts
 8 based upon the details attached.
 9 "TMO has confirmed that lifts servicing the block
 10 (over 18m in height) meet the requirements for fire
 11 fighting lifts as per specification provided by TMO
 12 senior lift engineer."
 13 Then if you go down to the last paragraph:
 14 "We will include [these] statements for all
 15 assessment reports for those blocks visited on or after
 16 the 4th March 2010 and suggest that as you work through
 17 the action plan in relation to previous FRAs that you
 18 include these statement[sic] to indicate closure,
 19 thereby showing that the TMO is actioning the findings
 20 of the FRAs thus complying with the requirements of the
 21 Fire Safety Order."
 22 Now, I'll come back to that in a moment.
 23 Can I, before I do, show you what you say in your
 24 third witness statement at {TMO00847305/26},
 25 paragraph 91:

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1 "However, I never said to Andrew that the TMO were
2 confirming that the lifts in TMO's buildings over 18m
3 met all of the requirements of the regulations. My
4 intention was to point out the features of the
5 legislation that the lifts did display/comply with.
6 I was aware that the TMO lifts did not meet all of the
7 requirements."

8 Now, would you agree that your email went rather
9 further than what you say there, because the information
10 that you provided to Andrew Furness was to be used in
11 all future fire risk assessments and in previous FRAs to
12 represent that the lifts in buildings over 18 metres in
13 height were in fact firefighting lifts?

14 A. I wouldn't accept that, no.

15 Q. That is what he said in his response email, isn't it?

16 A. Well, I can only reiterate that he was at the meeting
17 where it was discussed and he thought — it was probably
18 his idea to set out the criteria that they did meet. So
19 he was absolutely clear that they weren't firefighting
20 lifts or evacuation lifts, so there wasn't any ambiguity
21 between us.

22 Q. Well, I'm not suggesting there was any ambiguity between
23 you at all, Ms Wray. What I'm putting to you is what
24 you say at paragraph 91 of your statement is a gloss,
25 and that when you look at the reply that Mr Furness sent

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1 back to you on 3 January that year, he says
2 {CST00003102}:

3 "The TMO has confirmed that lifts servicing the
4 block (over 18m in height) meet the requirements for
5 fire fighting lifts as per specification provided by the
6 TMO senior lift engineer."

7 So what I am suggesting to you is that he is
8 accepting the TMO's in-house definition of
9 a firefighting lift.

10 A. No, I don't — I disagree, because he was a very
11 competent fire risk assessor and he was involved in
12 a lengthy discussion about this, so he was absolutely
13 clear that they were not firefighting lifts.

14 Q. Well, can we go back, then, just to examine, word for
15 word, what he said in his email of response, please.
16 This is the previous document I showed you, which is at
17 {CST00003102}, top of the page.

18 He says there, first paragraph:

19 "We will include the following statement in relation
20 to fire fighting lifts based upon the details attached."

21 And the details attached are what you have sent him,
22 and this is the start of the statement he is saying will
23 go into FRAs:

24 "The TMO has confirmed that lifts servicing the
25 block (over 18m in height) meet the requirements for

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1 fire fighting lifts as per specification provided by the
2 TMO senior lift engineer."

3 What he is doing is telling you that he's going to
4 state that the TMO has said that lifts servicing the
5 relevant block meet the requirements for firefighting
6 lifts as per the specification. That's what he is
7 saying.

8 I'm putting to you that that is, to the extent that
9 it suggests that these lifts were firefighting lifts,
10 misleading, isn't it, because they weren't?

11 A. There's — there isn't really a disagreement here. They
12 were not firefighting lifts, he knew they were not
13 firefighting lifts, that is what — based on our
14 discussions and my email, that's what his decision was
15 to put into the FRAs.

16 MR MILLETT: Right. What did you understand —

17 SIR MARTIN MOORE-BICK: I have to say, Ms Wray, I'm puzzled
18 about this, because what Mr Furness seems to be saying
19 here is that he intends to include in fire risk
20 assessments a statement to the effect that the TMO had
21 confirmed that they were, that they met the requirements
22 for firefighting lifts, which is another way of saying
23 they are firefighting lifts.

24 Now, if you thought that was wrong, wasn't that the
25 moment at which you should have gone back and said,

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1 "Sorry, there's a mistake here"?

2 A. I think I went on and read "as per the specification
3 provided by the TMO senior lift engineer".

4 SIR MARTIN MOORE-BICK: Well, was that a specification that
5 was different from some published specification that one
6 could refer to?

7 A. Yes, it's what we discussed just now. Andrew — so in
8 the meeting, Robin Cahalan was very clear that we
9 didn't have any firefighting or evacuation lifts in the
10 stock. However, he went on to say — and I wish he
11 never had now, obviously — that actually our lifts in
12 high-rise blocks met quite a significant number of the
13 criteria, and I believe it was Andrew Furness who said,
14 well, that would be helpful to outline that. So I think
15 we've got tangled up in something that he instigated and
16 then worded ...

17 SIR MARTIN MOORE-BICK: Well, it looks like a recipe for
18 confusion if you're going to effectively create your own
19 definition of a firefighting lift which is then going to
20 be used without qualification.

21 A. Yeah. I mean, that was never the intention and, as
22 I say, when we wrote to the borough fire commander at
23 the time — and normally I would always have made sure
24 that I had speech marks and whatever and reiterated that
25 they don't meet these, however they do have the

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1 following features. But I can see that this is not
 2 greatly worded.
 3 SIR MARTIN MOORE-BICK: Yes.
 4 MR MILLETT: Thank you, Mr Chairman.
 5 It's more than not greatly worded. It is, as
 6 the Chairman has suggested, a recipe for confusion,
 7 because I'm suggesting to you that what you're doing
 8 here is accepting or going along with the suggestion
 9 that you would call lifts firefighting lifts not in
 10 accordance with established standards, but in accordance
 11 with the TMO's in-house definition?
 12 A. Yeah.
 13 Q. Yes?
 14 A. That wasn't the intention, but that appears to be the
 15 way it went, yeah.
 16 Q. Now, after this was agreed — and Carl Stokes of course
 17 became the selected TMO fire risk assessor later this
 18 year, at least for the medium-risk programme, and then
 19 again for the low-risk programme in the following
 20 year — you then gave Carl Stokes this information in
 21 the June of 2010, didn't you?
 22 A. I gave him, I think, the copy of the email that I sent
 23 to Andrew Furness setting out what was below.
 24 Q. Yes. We don't perhaps need to look at it,
 25 {CST00001887/2}, meeting of 22 June referred to in his

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1 letter of 23 June 2010.
 2 You also repeated it in your meeting with him on
 3 24 September 2010, as repeated in his letter back to you
 4 of 27 September 2010.
 5 A. Yeah.
 6 Q. We went through all this last week.
 7 Perhaps we should just look at the last of those
 8 documents, {CST00003061}. This is his letter back to
 9 you of 27 September 2010, following your meeting on the
 10 24th of that month. If you go to page 1, there is the
 11 first page of the letter.
 12 You can see that there is a long list on the first
 13 page of the items covered by the letter, and just below
 14 halfway down the list is, "Lift Maintenance Servicing
 15 and Testing Policy"; do you see that?
 16 A. Yes.
 17 Q. If you go to page 3 of the letter {CST00003061/3}, you
 18 will see where that's covered, under the heading "Lift
 19 Maintenance Servicing and Testing Policy in TMO
 20 Residential Buildings" towards the foot of the page, and
 21 it says this:
 22 "The following information relates to fire fighting
 23 and evacuation lifts in TMO residential buildings, over
 24 18 meters in height: (copied of an email from
 25 Mrs Wray)."

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1 There and over the page your email is copied, and
 2 that's really a lift from the 3 March 2010 email we saw
 3 earlier.
 4 A. Yeah.
 5 Q. Yes.
 6 Now, can we take it, then, that you instructed
 7 Carl Stokes, in preparation for his taking on the medium
 8 and then later on the low-risk programme, to include the
 9 same phrase in his fire risk assessments that you had
 10 agreed with Andrew Furness?
 11 A. I didn't instruct him to use the same, and also the
 12 medium-risk would be generally the blocks under
 13 18 metres, which we had already established were —
 14 probably didn't even have this number of attributes. So
 15 it didn't automatically follow that the blocks that he
 16 was going to be assessing met the same criteria in terms
 17 of height.
 18 Q. Well, we know what happened in the end, because in fact
 19 he became the fire risk assessor for all the blocks of
 20 all risks in the estate.
 21 But if you look at the list, it goes over to page 4
 22 of the letter {CST00003061/4}, and after the nine
 23 paragraph points, in the first sentence there of the
 24 text, he says:
 25 "From the information above the lifts where fitted

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1 in residential building would also be suitable to be
 2 used by disabled persons as a means of evacuating the
 3 premises and the TMO asset register/system holds all the
 4 premises address ..."
 5 Et cetera, et cetera.
 6 A. Yeah.
 7 Q. So it's clear from that, isn't it, that you are
 8 proceeding with Mr Stokes in the same way that you had
 9 been proceeding, as we saw, with Mr Furness?
 10 A. Erm —
 11 Q. In other words, to treat the lifts in the TMO estate as
 12 firefighting lifts or evacuation lifts.
 13 A. I am confident that I spoke to him repeatedly during the
 14 time that he worked for us on specifically this matter,
 15 and I know that there was a subsequent email from
 16 Robin Cahalarn, which might have been 2011, where Robin
 17 said, you know, "The criteria have now become clearer,
 18 and I'm just emailing to say we definitely do not have
 19 any firefighting or evacuation lifts", and that was sent
 20 to Carl and myself, and Carl came back even challenging
 21 that and saying, "Well, I'm not sure what standard
 22 you're referring to, but I'm not aware of any change" —
 23 so there was subsequent communication where
 24 Robin Cahalarn said, "Just to be absolutely clear, we
 25 don't have any, and the cost to upgrade them would be

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1 prohibitive", and he had that as well.
 2 Q. Why did you not go back to him on receipt of this letter
 3 and say to him, "Although the lifts have the features
 4 I have identified in my email which you have rightly
 5 lifted, these should not be taken as firefighting or
 6 evacuation lifts because they are not"?
 7 A. I think it is likely that I did go back to him verbally.
 8 I certainly did repeatedly over the years, and I still
 9 got met with, "No, I'm confident they are, I'm confident
 10 they are".
 11 MR MILLETT: Well, Mr Chairman, we will be pursuing that
 12 evidence after the break. I think now is a convenient
 13 moment.
 14 SIR MARTIN MOORE-BICK: Yes, all right, thank you very much.
 15 Well, it's a good time to have a break for some
 16 lunch, Ms Wray. We will resume at 2 o'clock, please.
 17 Again, please don't talk to anyone about your evidence
 18 while you're out of the room.
 19 THE WITNESS: Thank you.
 20 SIR MARTIN MOORE-BICK: All right? Thank you very much.
 21 (Pause)
 22 2 o'clock, then, please. Thank you.
 23 (1.00 pm)
 24 (The short adjournment)
 25 (2.00 pm)

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1 SIR MARTIN MOORE-BICK: All right, Ms Wray, ready to carry
 2 on?
 3 THE WITNESS: Yes.
 4 SIR MARTIN MOORE-BICK: Thank you.
 5 Yes, Mr Millett.
 6 MR MILLETT: Thank you, Mr Chairman.
 7 Would you agree with me that anyone reading
 8 Carl Stokes' fire risk assessments for Grenfell Tower
 9 after, and including, December 2010, using the
 10 definition that you have used, would think that these
 11 were firefighting and evacuation lifts that could be
 12 used for the evacuation of disabled persons?
 13 A. Yes, I would agree.
 14 Q. And would you agree that that would be misleading?
 15 A. Absolutely.
 16 Q. Yes. And would you agree that you should not have
 17 instructed him to use a definition that did not conform
 18 to industry standards?
 19 A. Yes, but I would — but I didn't instruct him, but
 20 I take your point, yes.
 21 Q. Or allow him, then.
 22 A. Yes, and I genuinely tried not to, and I would also just
 23 add that I would never have let them be used as
 24 evacuation lifts.
 25 Q. Yes.

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1 Now, in your third statement, paragraph 91,
 2 {TMO00847305/26} — I think we have looked at this
 3 before — you say:
 4 "I was aware that the TMO lifts did not meet all of
 5 the requirements. I brought this to the attention of
 6 Carl Stokes however my recollection is that he remained
 7 resolute in his belief that they were fire fighting
 8 lifts."
 9 How and when did you bring that to Carl Stokes'
 10 attention, do you say?
 11 A. Always verbally, usually in person, not on the phone, on
 12 a number of occasions. I won't remember the dates. But
 13 I would say, "I'm absolutely convinced that they're not
 14 firefighting lifts because remember the correspondence
 15 we had with Salvus and Robin, and they don't have
 16 a hatch, but also they only meet a limited number of the
 17 criteria", and he would generally be focused on the fact
 18 that he said they had dual power supplies and therefore
 19 they did, and so we always got to an impasse where he
 20 didn't move from his position and I didn't move from
 21 mine, which wasn't satisfactory.
 22 Q. Was there a reason why at some point you didn't simply
 23 record formally the impasse that you say you had arrived
 24 at with him?
 25 A. No, there wasn't any reason.

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1 Q. Rather than doing it, as you call it, verbally, why not
 2 just write to him formally and say, "I insist that you
 3 are wrong and you need to record this fact in your
 4 FRAs"?
 5 A. Yeah, perhaps I should have done that. I just thought
 6 that I would be able to get through to him better
 7 verbally, that I would explain why I felt — what my
 8 judgement was based on, and it was based on discussions
 9 with the senior lift engineer, and that was his
 10 specialism, and his view was that none of our lifts —
 11 all of the stuff that we discussed this morning, really,
 12 but I couldn't get past him.
 13 Q. Let's see what he says.
 14 Can we go to his witness statement, please, page 43,
 15 {CST00003063/43}, and let's look together at
 16 paragraph 124, at the foot of the page.
 17 There is a heading, "Firefighting lifts", at the
 18 foot of page 43, and he says:
 19 "In the FRAs, I note that the two lifts at the Tower
 20 were 'firefighting lifts'. This was based on
 21 confirmation from the KCTMO that this was the case, both
 22 when I was first involved with the Tower ... [and he
 23 gives a document] and subsequently when I was provided
 24 lists of the KCTMO buildings which had firefighting
 25 lifts see email dated 6 June 2012 ... (a copy of which

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1 is also at the back of KCTMO's Fire Safety Policy ...)"

2 Now, what do you say about that?

3 A. I think that's not an accurate reflection of the many

4 discussions we had on the issue over quite a long

5 period. It got raised periodically and I was very clear

6 that I thought he was wrong, and that is not what it

7 says here.

8 Q. Right. But he is right, isn't he, that so far as the

9 documents are concerned, Grenfell Tower was included on

10 the list of buildings with a firefighting lift?

11 A. In terms of the criteria that had been set out, yes.

12 Q. Well, you say that, and you've said it a lot, but

13 nowhere did you say to Carl Stokes, "Look, if you're

14 going to call it a firefighting lift, tell people that

15 it is only a firefighting lift in accordance with the

16 definition coined by the TMO in-house and not with

17 British Standards'?"

18 A. I would have said that but not in writing.

19 Q. Right.

20 Now, if we go to your third witness statement,

21 paragraph 91, which we've just been on,

22 {TMO00847305/26}, if we look at paragraphs 91 to 95 at

23 pages 26 to 27, if you could just scroll down those just

24 to identify them for people, do you accept that you were

25 either copied in to emails or sent direct correspondence

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1 by Carl Stokes over the years, at least between 2011 and

2 2014 in particular, when he referred to the lifts as

3 firefighting lifts, and in all of those instances we see

4 no evidence at all that you corrected his impression

5 that they were not firefighting lifts?

6 A. I accept that's the case, yes.

7 Q. Yes.

8 Did the fact that you had thought he was wrong over

9 not just weeks and months but years not give you cause

10 to question his competency more generally?

11 A. No, there weren't — there was several things on which

12 we didn't agree, and this was probably the main one,

13 and — but, no, I wouldn't say that it did generally.

14 I think with most people there are things you agree and

15 things you don't agree, and overwhelmingly that —

16 I didn't have an issue with it, there were just a few

17 specific things.

18 Q. I mean, you did understand, did you — or maybe you

19 didn't — that the FRA, although prepared by Carl Stokes

20 as an independent person retained by you, was your FRA?

21 A. Yes.

22 Q. It was the TMO's FRA.

23 A. Yes.

24 Q. Yes? So if that's the case, why did you allow the TMO

25 to publish perpetually a statement that was erroneous?

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1 A. I can only reiterate what I've said, that he remained

2 very firmly of a view and his view wasn't shakable.

3 What we'd found from discussions with the Fire Brigade

4 is actually what they needed to know was whether the

5 lifts could be used as a fireman's lift so that they

6 could take control over it, and overwhelmingly that was

7 the case and they were happy with those arrangements.

8 I wasn't going to use them as evacuation lifts and I was

9 not going to let them be used as evacuation lifts, so

10 I suppose I didn't put as much store by it as I should,

11 in retrospect, obviously I didn't.

12 Q. You see, do you understand that people reading the FRAs,

13 including the residents of Grenfell Tower who asked for

14 and got the 2012 FRA, would be led to think that their

15 lifts in their building were firefighting lifts and

16 evacuation lifts?

17 A. Yes.

18 Q. Therefore, why did you allow that false representation

19 to be perpetuated over years?

20 A. I can't add anything to what I've already said.

21 Q. I mean, was —

22 A. I really tried to address it and I wasn't able to

23 persuade Carl, and he firmly viewed his position to be

24 right and mine to be wrong, and I should have thought of

25 taking some independent view, but I didn't.

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1 Q. Yes, that's the question: why didn't you go to take

2 a second opinion or get a limited further FRA report on

3 the question of lifts and publish that at the same time?

4 A. I should have done, clearly, and, I mean, I can only

5 reiterate that the Fire Brigade's interest was largely

6 confined to whether they were a fireman's lift and

7 making sure that when they turned up to take control,

8 that that all worked seamlessly, so we concentrated on

9 that, and I knew I wasn't going to use them as

10 an evacuation lift so I just didn't focus on what

11 I should have done.

12 Q. All right. But if you didn't think he was right about

13 lifts and was dogged in sticking to his position and you

14 had reached an impasse, as you call it, why did you

15 continue to use him at all as your FRA?

16 A. Well, you asked me if that was a warning sign, and it

17 wasn't, because we were happy with the quality of his

18 work, we just had a few things that we disagreed, and

19 as — we spoke already about the legal statement that he

20 puts in all of his FRAs, that I didn't particularly want

21 him to put that in, but he felt really strongly that

22 that was an accurate representation of not having to

23 share our FRAs with anybody, so he felt strongly it

24 should be in. So in the end I just lived with it

25 because I was happy with most of the quality of what he

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1 was producing.
 2 Q. You see, being happy with most of the quality of what he
 3 is producing in the context of health and safety is not
 4 really good enough, is it?
 5 A. Well, I don't suppose you're ever going to be — I doubt
 6 you'll find anyone who's 100% happy with anything they
 7 get from anybody, really. I probably didn't phrase it
 8 very well, but there were just a couple of things that
 9 I didn't agree with, but overwhelmingly I did.
 10 Q. Let's turn then to the fire safety strategy of
 11 November 2013 that we know from your earlier evidence
 12 you drafted. The final version is at {TMO00830598}. We
 13 looked at it together last week.
 14 If we go straight to page 12 {TMO00830598/12}, let's
 15 look at section 18.2, under the heading "Fire Safety &
 16 TMO Lifts", and 18.2, "Fire fighting lifts", you see
 17 that that's actually the heading, and it goes on to say:
 18 "As much of the housing stock is medium-rise and
 19 high-rise many of the blocks are served by one or more
 20 passenger lifts. Where appropriate 'fire fighting
 21 lifts' are provided within TMO residential blocks. This
 22 is to satisfy the requirements of the Building
 23 Regulations which consider the height of the building
 24 etc. When lifts are installed they comply with the
 25 relevant standards at that time and when they are

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1 subsequently replaced the replacement lift is compliant
 2 with the standards current at the time of replacement.
 3 The criteria for a TMO fire fighting lift is set out
 4 below ..."
 5 Now, do you agree that that paragraph doesn't
 6 indicate to the reader that the lifts only possess
 7 certain features of a firefighting lift properly
 8 so-called?
 9 A. It doesn't make it explicit, no.
 10 Q. No, and doesn't say that the TMO firefighting lift which
 11 you there have put in quotation marks is a self-defined
 12 criteria different from the industry standard
 13 firefighting lift, does it?
 14 A. No, it doesn't.
 15 Q. Would you agree also that in using the term
 16 "fire fighting lift" as the heading to the paragraph,
 17 and then repeatedly through the paragraph, that would
 18 give or tend to give the impression to the reader that
 19 the lifts were in fact firefighting lifts, according to
 20 the standard definition?
 21 A. It may have done.
 22 Q. Yes, and that was misleading all round?
 23 A. Potentially, yes.
 24 Q. Yes, potentially, and it could create confusion about
 25 the status of the lift and the additional protection

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1 that it could provide; yes?
 2 A. Potentially, yes.
 3 Q. And you had enshrined that into a foundational document,
 4 namely the TMO's fire safety strategy?
 5 A. Yes.
 6 Q. Now, when it came to drafting the 2017 strategy, the one
 7 that was adopted the day before the fire, this paragraph
 8 was not materially amended, was it?
 9 A. Erm —
 10 Q. Would you like to look at it?
 11 A. No, if you say not, that's fine. I can't really recall,
 12 but yeah.
 13 Q. I don't want to put something to you that isn't right.
 14 {TMO00832724/13}, please. We could probably have
 15 them both up side by side, if it were possible to do
 16 that.
 17 It's become 19.
 18 A. Yeah.
 19 Q. And specifically 19.2, "Fire fighting lifts". If you
 20 just read the text there, do you agree with me that —
 21 A. Yeah, no, you're right, it's not —
 22 Q. Yes, so you accept that there was no material
 23 amendment —
 24 A. No.
 25 Q. — come June 2017, when this new strategy was adopted.

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1 My question is: why was that? Why was there no
 2 amendment to that?
 3 A. I suppose — well, I should have been clearer about what
 4 I was defining, because nothing else had changed. The
 5 lifts we had were still not firefighting lifts or
 6 evacuation lifts, and they still largely in the
 7 high-rise buildings met the criteria that we'd
 8 identified, so I should have been explicit.
 9 Q. Right.
 10 Let's look and see how this was presented to the
 11 LFB.
 12 Can we go back to your third statement now, please,
 13 and pick it up at paragraph 96 on page 28
 14 {TMO00847305/28}.
 15 At the top of the screen, you say:
 16 "It is my belief that we informed the LFB that the
 17 lifts were not fire fighting lifts as this is what the
 18 TMO's lift engineer advised me. I passed this
 19 information on to Carl Stokes."
 20 The first question is: was that Robin Cahalarn's
 21 28 February 2011 email we saw?
 22 A. Yes, and obviously other verbal conversations as well.
 23 Q. When you say you passed this information on to
 24 Carl Stokes, is that the email of 3 March which we saw?
 25 A. Yes.

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1 Q. 3 March 2010. Yes.
 2 Now, let's look on to 2012.
 3 If we go to {CST00002920}, you can see that you
 4 wrote to Nicolas Comery at the LFB on 29 May 2012.
 5 A. Okay.
 6 Q. It's the second email down, from you to Nicolas Comery,
 7 "Re: Trellick Tower", and if you look at item 3, you say
 8 this:
 9 "In discussions with your predecessors we clarified
 10 that many of our lifts meet the majority, but not all,
 11 of the criteria for fire fighting lifts. (For example
 12 we do not install a trap door/hatch in the roof of the
 13 car etc.) It was agreed that we would clarify the
 14 criteria that our 'fire fighting lifts' do meet and I
 15 have attached an e-mail to the then Borough Commander,
 16 Brian Deans, setting out these criteria. Additionally,
 17 I attached a list of the blocks where these lifts are
 18 located and you will see this includes Trellick Tower."
 19 You can also see that in fact that's sent on to
 20 Carl Stokes, at the top of the screen, if we just pick
 21 that up.
 22 A. Yeah.
 23 Q. So would you just accept, or perhaps agree with me,
 24 looking at that, that so far as you were concerned,
 25 Carl Stokes would have read this and perhaps realised

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1 that the firefighting lifts as a phrase was a TMO
 2 coinage, rather than meeting the —
 3 A. I think he was aware that it was just limited criteria.
 4 Q. Yes.
 5 A. I'm absolutely convinced he was, and this is another
 6 example of something that it's not ambiguous, it's
 7 clear, and I'm sure I would have copied other older
 8 correspondence, as well as you referred to the email
 9 directly from Robin Cahalarn. So, yeah, I do think he
 10 was clear what I was saying.
 11 Q. So then let's look at an email earlier on,
 12 {CST00002922}.
 13 This is historical. So you referred to Brian Deans
 14 in the email we've just seen.
 15 A. Yes.
 16 Q. This is looking back two years or so to 8 July 2010,
 17 when you write to John Calvert and Brian Deans at the
 18 London Fire Brigade, copied to Robin Cahalarn, and you
 19 say there in the second sentence:
 20 "Whilst it is acknowledged that our lifts not fully
 21 satisfy all of the criteria for fire-fighting lifts we
 22 can confirm that they meet the following ..."
 23 Then you set out what we've seen set out in your
 24 27 February Calaharn email and later on.
 25 Now, on either of those occasions, did you get

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1 a response from either John Calvert or Brian Deans?
 2 A. I honestly don't know, sorry, it's just —
 3 Q. Right.
 4 A. It's just so long ago, I don't know. But I did have
 5 dealings periodically with Brian Deans, so it's
 6 possible. It's possible, but I can't confirm, sorry.
 7 Q. Did you get a response to your 2012 email to
 8 Nicolas Comery about the limitations that you were
 9 attaching to firefighting lifts as a definition?
 10 A. I don't know that either, sorry.
 11 Q. Right.
 12 Did the LFB ever raise with you any concern that
 13 they had that the TMO lifts did not meet the full
 14 criteria in accordance with national standards which
 15 pertain to firefighting lifts or evacuation lifts?
 16 A. Not to my knowledge.
 17 Q. When Nicolas Comery retired, did you seek to inform his
 18 successor, Rebecca Burton, that the lifts were not
 19 firefighting lifts but only so-called firefighting lifts
 20 in accordance with a TMO definition?
 21 A. I don't recall that conversation.
 22 Q. No. Right. Is there a reason why you didn't tell her
 23 that, or did you make assumptions that she would have
 24 read the correspondence going back five years?
 25 A. Sorry, I've absolutely no idea. I don't know that we

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1 ever had a discussion. If we'd had a discussion, then
 2 I would have been clear, but I'm not sure that we
 3 proactively raised it with her. And, to be honest, it
 4 was generally the operational crews who were most keen
 5 to be aware, if anyone.
 6 Q. Right.
 7 I would now like to go to some specific issues about
 8 the lifts and start in April 2010.
 9 Can we please go to {IWS00001463}. This is the
 10 report of attendance of a primary incident we looked at
 11 this morning first thing.
 12 A. Okay.
 13 Q. This time let's look at lifts. We looked at it in the
 14 context of the AOV. It's for Grenfell, as you know, and
 15 relates to the fire in Grenfell Tower on 30 April 2010.
 16 If we go to page 2 {IWS00001463/2}, you can see on
 17 that page, "Fire fighting action"; do you see that? And
 18 then in the last part of that part:
 19 "Were building fire fighting facilities used: Yes."
 20 Then:
 21 "Reason facility did not work ... [Nothing].
 22 "Type of facility: Firefighting lift.
 23 "Facility used: No.
 24 "Was facility required?: True [in other words, yes].
 25 "Reason facility did not work (if applicable): Poor

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1 maintenance."

2 Now, I know you didn't see this report, as you told
3 us this morning, but did you otherwise know that poor
4 maintenance was one of the causes of the failure by the
5 firefighters to take control of the lifts at the
6 30 April 2010 fire?

7 A. That's actually not the case, because we were told
8 immediately after the fire that the lift hadn't worked,
9 so we sent the engineers, I think it happened on
10 a Friday night, so probably the next working day, to
11 investigate, and there was no defect. They couldn't
12 replicate a defect.

13 So I advised the Fire Brigade and we met
14 operational — I think possibly the station manager, but
15 some of the local crews on site on the Monday or Tuesday
16 of the following week, and we went through with them how
17 to take control of the lift and just to confirm the
18 arrangements for that, but also, in the course of the
19 conversation, they felt that they may have exceeded the
20 safe working load, because the number of firefighters
21 who had gone in with their breathing apparatus almost
22 definitely exceeded the safe working load. So I think
23 that the lift hadn't worked because of their action, and
24 that was a discussion we had and they accepted that that
25 was probably it.

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1 So I think when this was written that may have been
2 what they believed to be the case, but subsequent
3 investigation proved not to be so.

4 Q. This was written in the December of that year.

5 A. Well, it was published in the December, but ...

6 Q. Well, it's dated December.

7 A. Well, I'm just telling you what — the investigations
8 that we undertook with the Brigade, yeah.

9 Q. So you challenge the "Reason facility did not work ...
10 Poor maintenance", you say that's wrong?

11 A. Well, we investigated it, because that's what we were
12 required to do, and, on the basis of the investigation,
13 we couldn't replicate the defect, so we knew that this
14 didn't seem to make any sense. So we asked the
15 Fire Brigade if they'd be prepared to meet us on site at
16 Grenfell Tower.

17 Q. Yes, you explained.

18 Did you get a report from the TMO lift engineer
19 about the incident?

20 A. I would have at least had a verbal report from the TMO
21 lift engineer. It was possibly still Robin at that
22 time, I'm not quite sure.

23 Q. Is there a reason you didn't ask for a written report
24 from Robin Cahalarn?

25 A. I didn't consider one to be necessary. He attended the

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1 site meeting with me and with the Brigade and we had
2 a kind of robust conversation and tried to establish the
3 root of the problem, which seemed to be the sensible way
4 to proceed.

5 Q. Do you remember whether checking of the fire control
6 switch was part of the testing that was done the day
7 after the fire?

8 A. I'm sure it would have had to have been, because we sent
9 the engineers to do a thorough check on the lift because
10 we've got a fire and we're being told by the fire and
11 rescue service that it didn't operate the way that it
12 should, so they couldn't have confirmed to us that it
13 was fully operational and they hadn't been able to
14 identify a defect if they didn't investigate that. That
15 would have been a very obvious thing for them to do.

16 Q. Were any changes made following the fire in April 2010?

17 A. In terms of the lift maintenance or ...?

18 Q. Yes. Well, in terms of the fire switch, in terms of the
19 lift operation.

20 A. No, just — the only change was that I believe that —
21 I think I put something in writing to the Brigade just
22 to confirm how they took control of the lift and how it
23 worked locally, and — because I think they requested
24 that, but I don't think there were any other changes,
25 no.

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1 Q. And were there any changes in the maintenance regime of
2 the lifts after this fire?

3 A. Not that I'm aware of because, as we say, it seemed not
4 to have been a maintenance fault, it seemed to have been
5 sort of a problem with operation.

6 Q. Now, can we go to {TMO00855528}.

7 This is 2013 now.

8 If we look at page 1, second email down on that
9 page, we can see that there is an email from you to
10 Peter Maddison and others in which you discuss the LFB's
11 fire safety exercise at Grenfell Tower on the previous
12 Friday. Do you see that?

13 A. Yes.

14 Q. That was following the May 2013 power surges, wasn't it?

15 A. It may have been. I was — I had virtually no
16 involvement in the power surges. It came from — we're
17 always keen to promote familiarisation and we'd done
18 quite a successful exercise at Trellick Tower, and we
19 proposed — where we advised residents in advance and
20 then the Brigade also offered them a home fire safety
21 visit as part of the exercise, and we planned to roll it
22 out across the stock. But, actually, before we could do
23 that, Councillor Blakeman requested that we do the same
24 at Grenfell Tower, and there had been a bit of a delay
25 just because — in terms of the resourcing available to

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1 the Fire Brigade, so it was in relation to that. If it
 2 coincided with the surges, then I'm not really aware of
 3 that. It wasn't on my radar.
 4 Q. The answer to my question, I think, is yes, it was
 5 following it, but not as a result of it?
 6 A. Yes, sorry, long-winded, but yes.
 7 Q. Okay.
 8 If we look at the bottom of the page, you say:
 9 "This was also helpful for the TMO as two very minor
 10 issues were highlighted and we are now able to address
 11 these. Specifically, these were in relation to ..."
 12 If we turn to page 2 {TMO0085528/2}, second item:
 13 "Clarification on the operation of the override
 14 switch which puts the lifts under firefighters control —
 15 lift engineers have now been asked to provide a copy of
 16 the manufacturers instructions."
 17 A. Yeah.
 18 Q. So that was what you said.
 19 Can I just show you another document,
 20 {TMO00855611/2}. This is another email from you,
 21 18 July 2013, where you write to Richard Bourke,
 22 "RE: Grenfell Tower Lifts", and you say:
 23 "Richard
 24 "Appreciate your comprehensive response. Grateful
 25 if you could advise on one simple point please — how

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1 should the LFB operate this switch? I was on site
 2 recently with them and witnessed them turn the key in
 3 both directions (panicking) as they were unclear of what
 4 to do and further they were not sure when the lifts had
 5 transferred to their control and when they were still
 6 available to passengers for normal use. Therefore, if
 7 I could provide the LFB with very simple instructions on
 8 how they should proceed I think that would be helpful
 9 them [sic] and would reduce the likelihood of our lift
 10 becoming damaged etc."
 11 Now, looking at that one, but looking also at the
 12 previous email, what was the problem with the switch?
 13 A. We have a variety of lifts and I think they're all
 14 slightly quirky. I think they just weren't familiar,
 15 because possibly a crew hadn't done familiarisation
 16 before they went.
 17 It was a very simple kind of drop switch. It turned
 18 out to be you turn it in one direction to take control
 19 of the lift and you turn it in the other direction to go
 20 back into normal service, but you can't always
 21 immediately tell that you've now got control of the
 22 lift. So what this confirmed is if they step into
 23 the car and press a floor, they can tell that they've
 24 then got control of the lift. So they were just asking
 25 for clarity, which I believe we did provide.

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1 Q. Did the LFB struggle to operate the fire control switch?
 2 Clearly, it looks like —
 3 A. I think they must have on that day, and the feedback
 4 I had from I think the station manager was it would be
 5 helpful if we could just clarify.
 6 Q. Did you organise any testing of the switch in order to
 7 make sure it was working?
 8 A. I can't recall. Whatever I've done, I would have done
 9 in conjunction with the lift engineer, because
 10 I wouldn't normally go straight to the contractor. So
 11 they would have been aware. Sorry, I can't recall.
 12 Q. Right.
 13 Were any faults in the fire control switch
 14 identified?
 15 A. No.
 16 Q. Let's look at Richard Bourke's response, page 1
 17 {TMO00855611/1}, "Good morning Janice", 19 July 2013:
 18 "The fire recall Switch itself is marked with two
 19 opposing red arrows (see below picture ..."
 20 There is a detail here from Richard Bourke who was
 21 managing director of Independent Lift Services in
 22 Rainham in Essex.
 23 Was this response sent on to the LFB so that they
 24 would know how to work the thing?
 25 A. Either this was sent on or we did a bullet-point

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1 summary, I can't recall which, but we certainly would
 2 have provided what they requested.
 3 Q. Right, I see.
 4 How were matters left with the LFB after that so far
 5 as the fireman's switch is concerned?
 6 A. I think they were clear about — and confident about
 7 what they do in order to take control and how to
 8 reinstate it subsequently.
 9 Q. Right.
 10 Now, in respect of the replacement of the lifts at
 11 Grenfell Tower, you were aware, I think, that the lifts
 12 were replaced in 2005, weren't they?
 13 A. Yes.
 14 Q. You deal with that in your third witness statement at
 15 paragraph 88, at pages 25 to 26 {TMO00847305/25}, and
 16 I'll summarise it for you without needing to go there.
 17 You say that you had no role in the replacement of the
 18 lifts at Grenfell Tower in 2005. You say this was
 19 a capital project managed by the TMO's assets and
 20 regeneration department, not the health and safety team.
 21 But do you recall yourself having some involvement
 22 in that project in the early stages?
 23 A. I didn't recall, but I can see that I attended, I think,
 24 a progress meeting or an initial feasibility or ...
 25 yeah. I think I attended one or two meetings.

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1 Q. Yes.
 2 A. But I have no recollection — —
 3 Q. We have some examples of that in July 2003 and
 4 March 2004; yes?
 5 A. Yes.
 6 Q. Do you remember the budget?
 7 A. No, sorry.
 8 Q. I think you were there for the confirmation of the
 9 budget at £672,000. Do you remember that?
 10 A. No.
 11 Q. There was a meeting in April 2004 and again in
 12 November 2004, both of which you were present for, but
 13 let's go to the last of those, {APX00008294}. This is
 14 the minute of a pre—start meeting at Grenfell Tower
 15 estate office on Tuesday, 30 November 2004, and we can
 16 see you're present there.
 17 A. Yeah.
 18 Q. Yes?
 19 A. Yes.
 20 Q. As is Robin Cahalarn.
 21 If you go lower down the screen, item 2, "Contract
 22 particulars and scope of the works" is discussed, and in
 23 paragraph 2.2, it says this:
 24 "The selected Towers scheme would provide a 45%/50%
 25 increase in lift car size and 10% increase in entrance

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1 dimensions, together with an increase in contract speed
 2 of 30%, [thus] achieving an improvement in traffic
 3 handling of around 30%/35%."
 4 Just in general, Ms Wray, what was your role in
 5 those meetings between July 2003 and November 2004, the
 6 last of which I'm showing you?
 7 A. I think it was more to do with the fact that we were
 8 going to do tenant—in—place works on the block, and to
 9 have kind of a watching brief on what we were putting in
 10 place to protect the tenants, to advise them if there
 11 were going to be any other enhanced risks. It was
 12 a sort of — it was a bit of an overview, really.
 13 Q. To your knowledge, did anyone consider whether the
 14 height of Grenfell Tower, which was more than 18 metres,
 15 affect the type of lifts which ought to be installed?
 16 A. Sorry, I can't remember.
 17 Q. Was there any discussion about that, do you remember?
 18 A. Again, it's so long ago, I really can't recall.
 19 Q. You don't remember that.
 20 Did anyone consider as part of that project whether
 21 firefighting lifts were required to be installed at
 22 Grenfell Tower in accordance with current standards?
 23 A. Again, I've got no recollection.
 24 Q. At any time after the upgrade project finished in 2006,
 25 until the night of the fire at Grenfell Tower on

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1 14 June 2017, did you or anybody else you know of at the
 2 TMO ever subsequently consider upgrading the lifts so
 3 that they met the full criteria for firefighting lifts
 4 properly so—called?
 5 A. I'm not aware, but again, I would expect that the
 6 contract management team would be the people who would
 7 have put forward proposals for the works they were doing
 8 or the works they were proposing to do. They would have
 9 known what their budgets were, what their priorities
 10 were, and I wouldn't necessarily have been party to any
 11 of that.
 12 Q. Let's then turn to a new topic, which is fire safety
 13 issues at Grenfell Tower after the refurbishment.
 14 I want to focus for the moment on external façades.
 15 Can we start with that, please, with your first
 16 statement again, please, {TMO00000890/14}, and let's
 17 look together at paragraphs 65 and 66.
 18 Under the heading "Modifications to the exterior of
 19 Grenfell Tower between 2012 and 2016 (including cladding
 20 and insulation)", you say this:
 21 "I did not have anything to do with the selection,
 22 provision or installation of cladding or insulation
 23 during the refurbishment."
 24 Then at paragraph 66 you say:
 25 "I have no knowledge and would not have the

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1 technical expertise to assess whether the exterior of
 2 Grenfell Tower was compliant with relevant building
 3 regulations, fire regulations, other legislation,
 4 British Standards, guidance and industry practice. Nor
 5 do I have any knowledge of what advice or information
 6 was available, and what assessments were made, about the
 7 components that comprised the exterior of
 8 Grenfell Tower, its fire safety, fire—resistance and
 9 compliance with safety standards (including information
 10 or advice from manufacturers of relevant components)."
 11 Now, before the Grenfell Tower fire in June 2017,
 12 were you aware that there was cladding and insulation
 13 being applied to the exterior of that building?
 14 A. Not initially, because I wasn't part of the design team,
 15 I knew the works — I didn't really know the scope of
 16 the works, actually, for quite some time. So I became
 17 aware of it possibly whenever Carl saw a trial piece on
 18 the building that he mentioned to me. I wouldn't have
 19 known the scope of the works, necessarily. So I don't
 20 know at what point I became aware of it, but certainly
 21 well in advance of 2017.
 22 Q. You say well in advance of 2017 and you mention a trial
 23 piece. Would that have been in the summer, June/July of
 24 2014?
 25 A. That might have been.

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1 Q. Just to be clear, was that at a time when RBKC's
2 planning department was being asked to view the type of
3 rainscreen — colour, I should say, and finish of
4 rainscreen?
5 A. I'm not sure why it was there, I just recall that in
6 discussion with Carl he had said, "Oh, I wasn't aware",
7 or he advised that he'd become aware of the fact that
8 there was going to be cladding put on the building, he'd
9 seen a piece, and he was asking questions about the
10 fixings and whether they were metal, and so at that
11 point it was sort of — I was aware but not to any
12 extent.
13 Q. Right.
14 Having become aware, from it sounds at least roughly
15 to be the middle of 2014, of the fact that a cladding
16 system was going to be applied to the exterior of
17 Grenfell Tower, did you ever think that you would need
18 to know about whether the cladding was compliant with
19 the Building Regulations from a health and safety
20 perspective?
21 A. I believed that the design team, the project team, had
22 quite a significant level of competence in all sorts of
23 specialist areas, and that anything would have had to
24 have Building Regulations approval. And those people
25 are all technical experts in their field, so I believed

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1 that we had the right people in place to advise us.
2 Q. Yes. Leaving that on one side — and I understand your
3 answer — did you ever think that cladding could affect
4 fire safety for the residents of the building or
5 employees of the TMO who might be working in it?
6 A. I knew that there were instances of cladding being
7 problematic, but I didn't — throughout the world, but
8 I didn't necessarily know in detail, and I believed that
9 everybody who was technically competent and working on
10 the project probably knew an awful lot more about those
11 issues and how to avoid them and how to be compliant.
12 Q. Now, you gave considerable amounts of evidence last week
13 about your familiarity with the LGA guide.
14 A. Yes.
15 Q. Did you know at the time — that is from the summer of
16 2014, if that is the right time — that the LGA guide
17 had guidance in it about external fire spread?
18 A. Yes, a bit, yeah.
19 Q. Yes. Let's just look at it. We don't need to spend too
20 much time reading it all out, but let's just look at it,
21 {HOM00045964/111}. Let's look at paragraph 72, under
22 the diagram, "External fire—spread":
23 "The external façades of blocks of flats should not
24 provide potential for extensive fire—spread."
25 And it continues, and if you just read on and look

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1 into paragraph 72.2 as well.
2 Can we take it that you were aware of those
3 principles, at least in general terms?
4 A. Yes.
5 Q. Yes.
6 If you go to page 129 {HOM00045964/129},
7 paragraph 85, this governs "Controlling alterations so
8 that they are not detrimental to fire safety".
9 Again, can we take it that you were aware of the
10 principles set out in paragraphs 85.1 and 85.2 there;
11 yes?
12 A. Yes.
13 Q. Yes, and of course, the Grenfell Tower refurbishment was
14 a large—scale refurbishment programme, wasn't it?
15 A. Yes.
16 Q. Yes.
17 Did you understand that, as per 85.2, processes
18 should be in place for landlords and other responsible
19 persons to scrutinise alterations and building work
20 within common parts that could have an effect on
21 fire safety in the block?
22 A. Yes.
23 Q. And then it goes on, as you rightly point out, it is
24 important that Building Regulations approval is obtained
25 where relevant.

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1 So can we take it that you knew that the TMO, as the
2 responsible person, in accordance with its obligations
3 under the RRO, had to have a process in place for
4 scrutinising alterations so that you could understand
5 whether they had an effect on fire safety?
6 A. Yes, but we had employed a significant number of
7 technical experts with an awful lot more knowledge and
8 experience than me in order to advise us on the detail
9 of the products and the processes and the systems that
10 we were putting in place.
11 Q. If you turn to page 130 {HOM00045964/130}, if you look
12 at the box of examples, it's a lengthy list of bullet
13 points, but if you look at the third from the end, it
14 says this:
15 "A landlord undertaking a project to fit rain screen
16 cladding to an existing block of flats without
17 considering the potential for a fire from a flat to
18 travel upwards through the cavity behind the cladding to
19 spread into the flats above."
20 Did you consider that those paragraphs were relevant
21 to your role, particularly as the competent person?
22 A. I considered that I did not personally have the skills
23 to do that justice, and I was aware that the project
24 team had specialist consultants and contractors and
25 fire safety strategists and the whole range of experts

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1 with significantly more experience and awareness and
 2 knowledge than me, and my expectation was that they were
 3 in a better position to provide us with the advice that
 4 we required and ensure that we were compliant.
 5 Q. Yes. I'm not really sure that answers my question, and
 6 I'm not sure I'm asking it in a sharp enough way.
 7 Did you satisfy yourself that Claire Williams as the
 8 project manager knew that the LGA guidance contained
 9 these obligations?
 10 A. Probably not.
 11 Q. No. So who else, other than you, to your knowledge,
 12 knew the LGA as well as you?
 13 A. I didn't — because I wasn't on the project team, then
 14 I didn't know the specific knowledge and experience of
 15 the individuals working on the project, but I knew that
 16 we had specialists in all the relevant areas, and
 17 I would assume that therefore meant people who
 18 understood fire safety in blocks of flats. But I can't
 19 answer you specifically because I wasn't dealing with
 20 those individuals.
 21 Q. I understand that, and that again doesn't quite meet my
 22 point.
 23 The question is one of responsibility as the
 24 responsible person for making sure that this obligation
 25 was discharged, as the responsible person. So my

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1 question is: other than you, who was it within the TMO
 2 who knew that a landlord undertaking a project to fit
 3 rainscreen cladding to an existing block of flats had to
 4 consider the potential for a fire from a flat to travel
 5 upwards, et cetera? Who was it in the TMO, other than
 6 you, who knew that this policy existed, this guidance
 7 existed?
 8 A. I don't know. I don't know whether Peter Maddison knew
 9 or Claire knew.
 10 Q. No.
 11 A. But what I would say is this is captured in the
 12 LGA guide, but this isn't the only place that this
 13 requirement is known to people who are responsible for
 14 installing cladding to a compliant standard, liaising
 15 with building control. This isn't the only place that
 16 this obviously needs to happen.
 17 Q. No, indeed, but Claire Williams wasn't the competent
 18 person, was she?
 19 A. No.
 20 Q. And Claire Williams, as far as you know, wasn't
 21 instructed to go and read up on the LGA guide and make
 22 sure that the project complied not only with the
 23 contractual obligations, but also the statutory
 24 obligations under the RRO, or am I wrong about that?
 25 A. I don't know, because I wasn't part of — I'm sorry, my

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1 frustration is that I wasn't part of the project team,
 2 so I don't know the specifics of all of the different
 3 experts and their areas of responsibility and the level
 4 of experience they had. I'm confident that they would
 5 have had the skills and the knowledge and the
 6 understanding to be aware of this, and to be aware of
 7 where it states something equivalent in
 8 Building Regulations and other standards, but I wasn't
 9 part of that team, so I can't directly answer your
 10 question.
 11 Q. No, but I think you maybe nearly have.
 12 The only remaining question is: who was the health
 13 and safety professional sitting within the project team
 14 who could have picked up the LGA guide in the one hand,
 15 known the TMO's obligations under it and made sure they
 16 were discharged, particularly by reference to cladding?
 17 A. And I don't know the answer to that because I wasn't
 18 part of the project team or the recruitment of the
 19 project team or the drawing up of the tender or any of
 20 those things, so I'm afraid I'm not able to answer that.
 21 Q. Moving to the October 2014 Grenfell FRA, can we just go
 22 to that, {CST00003177/10}. We needn't look at the first
 23 page, we now know the date, it's 17 October 2014.
 24 At page 10, this is the action plan for that FRA,
 25 and if you look at item — well, it hasn't got an item

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1 number, but priority is high and the identified risk or
 2 hazard is:
 3 "The external face of this building is to be over
 4 clad. The piece of cladding fixed to the external wall
 5 at the moment is on timber battens.
 6 "Actions to be taken:
 7 "I would recommend that the contractor provides
 8 "1. The scope of works covering how this
 9 cladding[sic]? How will the cladding be fixed to the
 10 building?
 11 "2. What fixings will be used?
 12 "3. The fire rating of the cladding and the
 13 fixings?
 14 "4. The Building Control Officers acceptance of
 15 this fixing system and the cladding used?"
 16 Now, that action, as I've shown you, had a red or
 17 high-priority rating. That meant, didn't it, that it
 18 was due to be actioned, in accordance with your
 19 understanding, within two to three weeks; yes?
 20 A. Yes.
 21 Q. Do you remember seeing that action point?
 22 A. Yes.
 23 Q. Yes. When you saw that action point about the cladding,
 24 was it something that you were expecting Carl Stokes to
 25 opine on or was it something that you thought might have

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1 come from left field , as it were?
 2 A. No, I think it was valid for him to ask. I'm confident
 3 it would have been allocated to Claire Williams because
 4 the information would have had to come from the project
 5 team.
 6 Q. Right.
 7 Now, actioning the recommendation means simply no
 8 more than asking the contractor to provide answers to
 9 the four questions; yes?
 10 A. Yeah, and to get, yeah, building control's input, where
 11 they're at with it, what their views are, if they've
 12 approved it.
 13 Q. You are right, answers to the three questions and to get
 14 building control acceptance.
 15 A. Yes.
 16 Q. Did you pursue that with the contractor?
 17 A. I wouldn't have. Claire would have.
 18 Q. Right. So did you hand that action to Claire and say,
 19 "You've got two to three weeks to get on with it"?
 20 A. Yes.
 21 Q. You did, did you?
 22 A. Yes, it would have been allocated through the W2 system
 23 by then and she would have — it's high so it had
 24 pre-determined priority.
 25 Q. Would she have understood the action timing to be the

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1 same as you, namely it had to be done within two to
 2 three weeks and not just started within two to
 3 three weeks?
 4 A. Yeah, it's allocated by the system, yeah.
 5 Q. I see. So we're not on the Stokes understanding of
 6 actioning, we're in the TMO understanding of actioning?
 7 A. Yes.
 8 Q. Now, let's go to your first witness statement, please.
 9 I want to ask you about what you say there at page 15
 10 {TMO00000890/15}, paragraphs 68 to 69.
 11 You say there at 68:
 12 "68. The only time I recall having to consider the
 13 nature of the cladding on Grenfell Tower was following
 14 the fire that occurred on 19 August 2016 at
 15 Shepherd's Court.
 16 "69. Eight months later, on 6 April 2017, the LFB
 17 sent a letter to Laura Johnson highlighting that testing
 18 of the panels had found that the combustibility of the
 19 composition of the panels at Shepherd's Court did not
 20 meet the levels expected for conformity with the
 21 building regulations [then you exhibit it] ...
 22 Laura Johnson forwarded this letter to Robert Black and
 23 myself. I then forwarded it to various TMO staff for
 24 their attention [and you exhibit that] ..."
 25 Are you telling us here that this was the only time

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1 you were asked to consider the cladding on
 2 Grenfell Tower specifically?
 3 A. Other than the instance that you just referred to, which
 4 I'd obviously forgotten when I drafted this witness
 5 statement, yes.
 6 Q. You refer to the letter there in paragraph 69, the
 7 6 April 2017 letter. Let's look at that. That is at
 8 {RBK00026888}. It's a letter we looked at closely with
 9 Laura Johnson when she gave evidence. Let's look at it
 10 again now.
 11 It came in to RBKC from LFB on 6 April 2017 from
 12 Hannah Lougher of the LFB, and it then made its way up
 13 the chain on 19 April 2017, after a gap, because I think
 14 Ms Johnson was away on holiday, and it starts, "Tall
 15 buildings — external fire spread", and refers in the
 16 first paragraph to Shepherds Court.
 17 In the third paragraph, it says:
 18 "We have seen a number of cases where it appears, on
 19 the basis of the information available to us, that the
 20 level of fire protection to the external face of the
 21 building did not comply with the requirements of Part B
 22 of the Building Regulations insofar as they seek to
 23 limit the speed with which a fire can travel and spread
 24 over the external face of a building or may contribute
 25 to a fire .

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1 "Testing of panels has found that the combustibility
 2 of the composition of the panels at Shepherd's Court did
 3 not meet the levels expected for conformity with the
 4 building regulations. On testing it was found that
 5 panels may deform or delaminate exposing any combustible
 6 core or constituent material resulting in the panel
 7 becoming involved in the fire and allowing the fire to
 8 spread and enter flats other than the flat of origin of
 9 the fire ."
 10 Then if you look at the very foot of the page, if we
 11 can scroll down to that, in the penultimate line it
 12 says:
 13 "Contracts for the provision and installation of
 14 replacement elements of building facades, including
 15 insulation, replacement double glazing and associated
 16 spandrel and in-fill panels must ensure compliance with
 17 all [in bold and underlined] parts of Part B if they are
 18 to secure public safety and minimise fire losses."
 19 Then in the last paragraph:
 20 "I would therefore strongly urge that you consider
 21 this issue as part of the risk assessment process for
 22 premises under your control. I suggest that you make
 23 sure all relevant information about any replacement
 24 window and facade schemes is fully available to fire
 25 risk assessors. Where no reliable information is

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1 available for a given property, it is our general
2 expectation that a strategy to assess the risk and where
3 necessary implement short, medium and long term actions
4 to address the risk. This assessment will need to take
5 account of other fire safety measures already in place
6 in the building as well as potential mitigation measures
7 to ensure that any potential fire spread does not pose
8 a risk to health and safety."

9 Now, I've read that to you almost in full. We know
10 you got it at the time.

11 First of all, did the technical requirements in
12 respect of façades, insulation, replacement double
13 glazing and spandrel and infill panels mean anything to
14 you?

15 A. A bit.

16 Q. A bit? Not much?

17 A. The spandrel panels — so my recollection is that
18 shortly after this fire, Carl went to the building and
19 got as close to it as he could to do his own inspection,
20 so he mentioned to me this about — that it looked like
21 these were spandrel panels and that's how the fire had
22 propagated. So I wasn't surprised to receive something
23 specifically in relation to Shepherds Court. Yes,
24 sorry.

25 Q. But, as you say, not much.

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1 Let's look on, {TMO10016600}, which is your
2 exhibit 19. We see how this came to you and what you
3 did with it.

4 A. Yeah.

5 Q. You get this from Laura Johnson, as we can see, on the
6 19th, bottom of your screen.

7 A. Yeah.

8 Q. Because it comes to Robert Black and you, okay? Simply
9 "fyi".

10 A. Yes.

11 Q. You forward this on to Peter Maddison, Julie Selhep,
12 Alex Bosman, Anthony Cheney and others:
13 "Hi all

14 "FYI — Please see attached letter from the LFB
15 regarding external cladding and glazing."

16 Why did you forward this to other TMO staff in this
17 chain and staff at Repairs Direct, did you think?

18 A. I sent it to all of the technical — the senior
19 technical managers. So Peter Maddison was the director
20 for assets and regeneration, Alex Bosman,
21 Anthony Cheney, were his direct reports. Graham Webb
22 was obviously — he was in charge of all the responsive
23 repairs at that time. Derrick Singleton was the
24 responsive repairs manager, reported to Graham Webb.
25 Samuel Hart also was a manager in Repairs Direct, and

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1 Shannon MacInnes was the health and safety manager in
2 Repairs Direct. So I was trying to make sure all of the
3 senior technical managers and a health and safety
4 colleague were aware. I copied it to Barbara so she was
5 familiar, and my colleague Adrian Bowman, so that
6 everybody could see it and everybody could see what the
7 Fire Brigade were asking.

8 Q. Now, if we go to your first witness statement at
9 paragraph 70, page 15 {TMO00000890/15}, you say there:

10 "Following receipt of this letter, I checked with
11 Cari Stokes whether the new cladding panels fitted to
12 Grenfell Tower complied with the requirements of the
13 Building Regulations."

14 If you go on to page 49 in the same statement
15 {TMO00000890/49}, paragraph 227, you say there:

16 "To address our concerns about the contents of this
17 letter, I contacted our Fire Risk Assessor Carl Stokes
18 and sought confirmation that we did not have any blocks
19 with cladding of the nature described in the LFB's
20 letter ... In particular I was concerned about Grenfell
21 Tower which had recently some external cladding panels
22 fitted during the refurbishment. Carl advised me that
23 he had investigated thoroughly the details of the
24 installation at Grenfell Tower with Rydon on site and
25 had been advised that these complied with the

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1 requirements of the Building Regulations. Robert then
2 sent this information to Laura Johnson stating that it
3 might be useful to update the scrutiny committee."

4 Now, you say at the end of the page before, if we
5 just go back, that you were concerned about
6 Grenfell Tower which had recently some external cladding
7 panels fitted during the refurbishment.

8 Why were you concerned about the panels at
9 Grenfell Tower particularly?

10 A. I wasn't particularly, but the letter was talking about
11 external panels and flame spread, so in the first
12 instance I was concerned about whether we had any
13 buildings with spandrel panels, because that was what
14 had caused the problem at Shepherds Court, so I was
15 trying to identify any blocks where we had spandrel
16 panels, but obviously Grenfell Tower was on my radar
17 because we don't have — we've got virtually no blocks
18 with cladding, and it was kind of ... it was obvious
19 that we needed — I just needed to — what I thought was
20 double check that everything had gone through the
21 required approvals process.

22 Q. Right. So the letter prompted you to think about
23 Grenfell, even though it was related to spandrel panels?

24 A. Well, it's external spread, so it seemed appropriate,
25 yes.

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1 Q. Yes, I'm not disagreeing with you at all.
 2 A. Oh, okay, sorry.
 3 Q. I'm just trying to understand your thinking.
 4 Now, apart from Carl Stokes, did you email anybody
 5 else to check whether the new cladding panels at
 6 Grenfell complied with the requirements of the Building
 7 Regulations?
 8 A. As you saw, I copied it to all of those people.
 9 I didn't specifically — I mean, it was quite clear what
 10 the Fire Brigade were asking, so I didn't think there
 11 was any value in me reiterating in an email what the
 12 Fire Brigade were asking, and then I copied it to Carl
 13 as well. I don't think any of my other colleagues
 14 responded.
 15 Q. No. Well, were you expecting a response from them?
 16 A. Well, I thought they might have been slightly — at
 17 least curious or, you know, "How can we move this
 18 forward? How can we make sure that we get the right
 19 information and give it to the risk assessor?"
 20 I thought there was a conversation to be had about how
 21 we would move forward.
 22 Q. Right. But you wouldn't expect any of them to tell you
 23 whether or not they complied with the Building
 24 Regulations, would you?
 25 A. No, no, that wasn't —

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1 Q. No.
 2 A. — what I meant, no. There were sort of two aspects to
 3 it, really, I was thinking.
 4 Q. Yes. I mean, to be clear, you didn't email or contact
 5 anybody else to check whether the new cladding panels
 6 about which you were particularly concerned, as you say,
 7 at Grenfell Tower complied with the Building
 8 Regulations?
 9 A. No, but I had written to Peter Maddison, who was
 10 ultimately the technical director for the project, so
 11 I don't think it would be unreasonable to expect him to
 12 raise any concerns or issues or anything that we hadn't
 13 met.
 14 Q. Right. And why did you email Carl Stokes?
 15 A. Well, partly because he, as you know, had been doing
 16 assessments on our properties for a period of years and
 17 knew the properties quite well, and is — knows spandrel
 18 panels quite well, hadn't identified any that I was
 19 aware of, but I wondered if there were ... it was sort
 20 of a double check, really, just to get his view on was
 21 there anything that we hadn't previously identified and
 22 we should investigate further and ... yeah, that,
 23 really.
 24 Q. What did you understand to be Carl Stokes'
 25 qualifications in respect of advising on external

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1 cladding panels in the context of this letter?
 2 A. As I say, he went to Shepherds Court, so he was clear —
 3 I mean, he recognised spandrel panels, he knew about
 4 those, he knew what they looked like, he knew what he
 5 was looking out for. He'd been there shortly after the
 6 fire, so he was very clear, and he was familiar with our
 7 properties, so he certainly would recognise any spandrel
 8 panels and would have been able to — or if he had any
 9 that he had any doubts about, he could have flagged them
 10 up and then we could have looked to find a consultant or
 11 a contractor to go and do further investigations. So
 12 I was looking for him to highlight anything that he
 13 thought would potentially require more investigation.
 14 Q. That's not quite what you say in your statement. You
 15 say you checked with him to see whether the new cladding
 16 panels fitted at Grenfell complied with the requirements
 17 of the Building Regulations. That's not the same thing
 18 as identifying any buildings in the TMO's stock that
 19 might happen to have spandrel panels, is it?
 20 A. Well, it's both, because the letter's kind of asking for
 21 both. I probably haven't captured it very well in my
 22 statement.
 23 Q. Focusing on what you say you were after, which is his
 24 advice as to whether the new cladding panels fitted to
 25 Grenfell Tower required with the requirements of the

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1 Building Regulations, what did you understand were
 2 Carl Stokes' qualifications in respect of advising on
 3 that?
 4 A. It was really to do with the discussions and the
 5 reassurance that he had had from Rydons and, as he put
 6 things into his action plan as significant findings, as
 7 we were given documentation to address these, I'd been
 8 forwarding these items to Carl and asking if he was
 9 happy with what they were providing, if he felt that
 10 that complied, so he'd done that sort of desktop
 11 exercise based on the documentation. So I was looking
 12 for reassurance based on those, the conversations and
 13 the sight of the documentation provided by Rydons.
 14 Q. Right, so you were asking Carl Stokes really for what
 15 he'd been told and given by Rydon, rather than any
 16 professional opinion?
 17 A. Well, yes, because he wasn't part of the contracts team.
 18 Q. You see, that's why I'm asking. In your statement, as
 19 I showed you, at paragraph 70 {TMO00000890/15}, you
 20 said:
 21 "... I checked with Carl whether the new cladding
 22 panels fitted to Grenfell Tower complied with the
 23 requirements of the Building Regulations."
 24 Were you asking him simply for what he had been told
 25 by Rydon or were you asking him for his professional

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1 opinion about whether the cladding panels did comply?
 2 A. I was asking him, on the basis of the documentation that
 3 we had been provided with, if it was his understanding
 4 that they complied with the Building Regulations.
 5 Q. And what did you understand to be his qualification to
 6 express an opinion about that matter?
 7 A. My understanding was that if it had the appropriate
 8 Building Regulations approval, that's what we would be
 9 expecting, and he would have seen enough Building
 10 Regulations approvals in his time that hopefully he
 11 could have had advised.
 12 Q. Well, that's something you could do, isn't it? Sorry,
 13 I'm muddled by that. If you're asking him, on the basis
 14 of the documents that he had seen, whether it was his
 15 understanding that the panels complied with the
 16 Building Regulations, what qualifications did you think
 17 he had to be able to offer that opinion to you?
 18 A. He's my fire risk assessor, so he's my kind of
 19 fire consultant and the only person that I've got
 20 recourse to. I haven't got recourse to anyone who was
 21 on the project team. So I'm asking him, on the basis of
 22 the documentation that he's got and the discussions that
 23 he's had with the contractor and any other information
 24 that he may have, whether he considered it complied.
 25 And —

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1 Q. Whether he considered it complied?
 2 A. Well ...
 3 Q. Let me be clear. You could do one of two things: you
 4 could say, "Carl, will you go and collate all the
 5 information you've given me and summarise the views
 6 you've been given about compliance".
 7 A. Yes.
 8 Q. Or you could say, "Look at what you have been given and
 9 offer me your professional opinion". Which was it?
 10 A. Erm ... which was it?
 11 Sorry, run that by me again. Apologies.
 12 Q. Well, you could either ask him for a summary of what
 13 he'd read in the material he had been given, which is
 14 what you could do, but it would be more convenient for
 15 him to do it, or you could ask him for his professional
 16 opinion about compliance. Which were you asking him
 17 for?
 18 A. I was asking him, based on the documentation that he had
 19 and the discussions that he'd had with people involved
 20 in the contract and the building control people who he
 21 may or may not have bumped into on site, whether the
 22 building complied.
 23 Q. So you are asking him for his professional opinion,
 24 based on that material, about compliance?
 25 A. Well, yes.

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1 Q. Yes. And what qualifications did you think he had to
 2 offer an opinion about compliance with the
 3 Building Regulations?
 4 A. Well ... I'm not really sure how to answer that.
 5 I mean, he ... sorry, I'm not really sure how to answer
 6 that. He would have been — we were basically —
 7 I suppose I was basically asking him if it complied with
 8 the Building Regulations, and he had previously
 9 assessed, I'm imagining, a number of Building
 10 Regulations documentations and understood a lot more
 11 about the Building Regulations than I did, so I believed
 12 he was qualified to provide that.
 13 Q. Now, we know that he included details about the cladding
 14 in his FRA of 20 June 2016. Let's look at that,
 15 {CST00003145/4}.
 16 On page 4, you can see at the very top of the page
 17 it says this:
 18 "New external cladding has been fitted to this
 19 building as part of the project of
 20 refurbishment/construction work being undertaken on and
 21 within this building. The original external face of
 22 this building has been over clad, the new fire rated
 23 cladding is fixed to the out face of the building by
 24 metal fixings and the whole process has been overseen by
 25 the RBKC Building Control Department and Officers. They

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1 have approved and accepted the fixing system and
 2 cladding used."
 3 Did you read that passage?
 4 A. Yes.
 5 Q. Did you pay attention to it?
 6 A. I believe I did, yes.
 7 Q. Yes. What did you understand by it?
 8 A. I understood that he had been in discussions with Rydons
 9 and Claire and the other professionals dealing with the
 10 project, and he had sought documentation, including the
 11 Building Regulations approval but other documents, and,
 12 based on that, he'd interpreted that as approval was
 13 given and therefore it met the requirements at the time.
 14 Q. Yes.
 15 Most of these are observations, so to that extent
 16 I understand your answer. Let me see if I can focus
 17 a bit more.
 18 When he says "new fire rated cladding is fixed to
 19 the [outer] face of the building", what did you
 20 understand he meant by that?
 21 A. I understood that the cladding that had been fixed to
 22 the outer face of the building would have had the
 23 required certification to ensure that it was appropriate
 24 to that location and provided the degree of fire
 25 retardance.

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1 Q. Was it your understanding that Carl Stokes had himself
2 assessed the external cladding for whether it had
3 complied with the Building Regulations and himself come
4 to the view that it did, or, as he put it, it was fire
5 rated?
6 A. The latter, I believe. I don't — I mean, he will have
7 assessed any documentation that was provided to him, but
8 that doesn't alter the fact that the project team
9 leading the project have that remit, and Carl's
10 continuing to do his fire risk assessments, but the
11 responsibility sat with the project team.
12 Q. Right. I think it's the latter which I'm not quite sure
13 I understand. Let me see if I can understand it.
14 When he says here that the new fire rated cladding
15 is fixed to the outer face of the building, was it your
16 understanding that Carl Stokes had himself assessed the
17 external cladding and concluded that it complied with
18 the Building Regulations?
19 A. I'm not sure how much documentation he had, so I'm not
20 sure he'd have been in a position to do his own
21 independent assessment, but he certainly would have had
22 copies of the Building Regulations approval, which would
23 have given him assurance.
24 Q. What I'm really seeking to understand is whether, when
25 you read this, you thought he was simply passing on

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1 something he'd been told without applying his mind to
2 whether it was right or wrong, or whether he was
3 offering his own opinion on the basis of what he'd been
4 given. What did you understand?
5 A. I think possibly a mixture of both, although I still
6 maintain that the responsibility sat with the project
7 team and all of their experts. So he was raising
8 an issue, noting that there was cladding on the outside
9 of the building, knowing that that can be problematic,
10 getting as much documentation as he can to confirm the
11 details of the cladding and the approvals, and then just
12 passing that on to me. So he's not doing a thorough
13 desktop of all of the cladding and the insulation and
14 all of those things, and I don't think that that's his
15 responsibility to either.
16 SIR MARTIN MOORE—BICK: Just help me with this: did you
17 understand that Carl Stokes was providing you with some
18 assurance over and above that which you would have got
19 from the project team or the building control officers?
20 A. Probably not over and above, actually, probably just
21 confirming that the due process had been followed and
22 the building regs had been complied with.
23 SIR MARTIN MOORE—BICK: Yes. All right. Thank you.
24 MR MILLETT: You say "probably just confirming", but isn't
25 it right that, in order to offer that confirmation that

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1 the due process has been followed and the
2 Building Regulations have been complied with, he had to
3 satisfy himself that that was the case, independently?
4 A. I don't think he would have had access to all of the
5 documentation in order to make that judgement.
6 Q. Well, did you think that at the time?
7 A. I knew how difficult it was to get the documentation we
8 were requesting, and that's why some of the FRA actions
9 took so long to close down, so I don't think it would
10 have all been forthcoming.
11 Q. Did it not occur to you at the time, if that was your
12 thinking, that Carl Stokes had absolutely no business to
13 be offering what looks like an opinion of his own on
14 whether or not the cladding adhered to the
15 Building Regulations?
16 A. But if building control are saying it complies with the
17 Building Regulations, he's passing that information on,
18 isn't he?
19 Q. Well, he could simply have said, "The cladding has been
20 passed by building control", but what would be the point
21 of that? And indeed the question I have for you is:
22 what did you understand to be the point of any of this?
23 A. I think he thinks it's his responsibility to flag up
24 anything — any material changes, whether they be
25 externally in the building or in the building, and he

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1 was probably trying to offer some reassurance that the
2 whole thing had gone through the building control
3 department and approvals seemed to be in place.
4 Q. Had you ever asked Mr Stokes for his advice on the
5 compliance of the cladding panels at any time before
6 2017?
7 A. No, I don't believe —
8 Q. Sorry, 2016. I'm sorry.
9 A. Sorry. I don't believe I did.
10 Q. That being so, why did you think it appropriate to ask
11 him for his view in April 2017, on receipt of the LFB
12 letter of 6 April?
13 A. I can't really answer that, other than he's the
14 assessor, he knows our buildings better than most
15 people, and in retrospect I should have gone through
16 Claire and all the way back through the design team, the
17 project team, but at the time, I can't really tell you,
18 just he seemed — and he had some familiarity with it,
19 I knew that he would have read all the documentation he
20 had been provided with. He, I was confident, would be
21 clear that where building regs requirements were around,
22 he would have gone to the best of his knowledge to
23 ensure that they had been adhered to and complied with.
24 Q. The letter from Dan Daly, as we saw, said in the second
25 paragraph that you should make sure that all relevant

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1 information about replacement window and façade schemes
 2 was fully available to fire risk assessors.
 3 A. Yeah.
 4 Q. When you asked Carl Stokes for his advice on the letter,
 5 did you take steps to make sure that he had all of the
 6 relevant information about the replacement windows and
 7 the façade scheme for Grenfell?
 8 A. No, not at that time, no —
 9 Q. Why is that?
 10 A. Well, as I said previously, that was part of the reason
 11 for passing on — apart from just increasing the
 12 awareness of the letter, was also to get my colleagues
 13 in the technical teams to start thinking about how that
 14 could practically be managed, how will we be able to
 15 extract the documentation that we required, to pass it
 16 through to the assessor as he continues doing his
 17 assessments.
 18 Q. Did you take any steps to identify each piece of
 19 information or document, guidance, certificates, that
 20 Carl Stokes was given by Rydon so that he could give you
 21 the opinion you were after?
 22 A. We had the significant findings, we had what he was
 23 asking for, we knew what we — so I could have gone back
 24 to that and identified what had been passed to him. He
 25 didn't ask me for anything additional before he gave me

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1 his view. If he had, I would have pursued that.
 2 Q. Well, can you sit there today and tell me what he had?
 3 A. No, not without going back to the significant findings,
 4 no.
 5 Q. No, but do you remember applying your mind to making
 6 sure that Carl Stokes had in front of him all the
 7 documents that you might reasonably think he needed in
 8 order to be able to express the opinion you were asking
 9 him for?
 10 A. I know that — I'm confident that when we got the
 11 significant findings in the June, as and when the
 12 documentation came through from Rydon's particularly,
 13 I would have sent each of them to him saying, "This is
 14 what I've been given to respond to 19d or whatever, is
 15 this what you're asking for, is this good enough, are
 16 there any issues, do I need to chase for a further
 17 version, so effectively is it okay to complete this
 18 action, has this been complied with?" So I knew that as
 19 all of that had come through, I would have been passing
 20 it to him, and I wouldn't have closed down any action
 21 unless he confirmed.
 22 As I sit here now, without going through and doing
 23 that piece of legwork, I can't tell you for sure what
 24 I —
 25 Q. You see, we haven't seen any communication from you to

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1 anybody in the project team or Rydon, for that matter,
 2 to say, "Please will you give Mr Stokes all the
 3 technical data that you've got on the rainscreen
 4 materials, the insulation, the infill panels and the
 5 fixings so that he can make an assessment of his own
 6 about whether they comply with the
 7 Building Regulations".
 8 A. Yeah, and I didn't do that.
 9 Q. No.
 10 A. I didn't do that partly because they had their own fire
 11 specialists and they had all of their experts, and also
 12 because I almost only knew anecdotally initially that
 13 there was cladding involved. So they had their
 14 specialist team that were getting on and doing
 15 rigorously, and I'm sat somewhere else trying to keep
 16 other things going, so no, I didn't do that.
 17 Q. No, but —
 18 A. But I thought it was being done and I thought we'd
 19 appointed people who had all of the right skills in
 20 order to do it.
 21 SIR MARTIN MOORE-BICK: If you thought and if you understood
 22 that the project team had a specialist fire consultant,
 23 did you think it might be worth bringing this letter to
 24 the attention of the consultant and perhaps asking that
 25 consultant whether he had any comments about it?

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1 A. I could have done. I mean, by then the contract's over
 2 sort of nearly 12 months and I just — perhaps I just
 3 didn't think about it. Yeah, and that's a possibility.
 4 SIR MARTIN MOORE-BICK: I raise it because it might have
 5 occurred to you that a proper fire consultant might have
 6 had rather more to offer than Mr Stokes in relation to
 7 those sort of technical questions.
 8 A. Yeah. No, you're right. I suppose — perhaps I was
 9 a bit naïve in that because there were all of those
 10 people involved in the project, I thought that it would
 11 have stalled more than it did, because if the
 12 information and the approvals weren't coming, then it
 13 would have had to be redesigned or reconfigured, and
 14 I wanted to believe that none of those people would let
 15 it get to its conclusion unless it was all done entirely
 16 as it should have.
 17 SIR MARTIN MOORE-BICK: Thank you.
 18 A. Okay.
 19 MR MILLETT: Can we go to {CST00003112}, please, which is
 20 your email of 24 April 2017 to Carl Stokes.
 21 Mr Chairman, I've embarked on this document, and
 22 then spotted the time. I'm in your hands as to whether
 23 we cover this.
 24 SIR MARTIN MOORE-BICK: How long do you expect to take with
 25 it?

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1 MR MILLETT: On this topic, longer than would take us to the
2 useful —
3 SIR MARTIN MOORE—BICK: Is this the start of a new topic?
4 MR MILLETT: Well, it's not, no. It isn't the end or the
5 beginning of the end, but it might be the end of the
6 beginning, so to speak. Tea might be better taken now.
7 SIR MARTIN MOORE—BICK: Well, that's a much better way of
8 putting it. All right, well, we will take tea now,
9 then.
10 These clocks are all showing something different,
11 but I'm assuming Mr Millett is looking at the one on the
12 far wall, so we'll stop now and we'll have a break until
13 3.35, please.
14 MR MILLETT: Yes, we have an information asymmetry.
15 SIR MARTIN MOORE—BICK: Yes.
16 All right, 3.35, please, and no talking to anyone
17 about your evidence over the break, please.
18 (Pause)
19 Mr Millett, I'd really quite like to finish the
20 witness today if that's reasonably possible. What do
21 you think?
22 MR MILLETT: I don't think it's reasonably possible.
23 SIR MARTIN MOORE—BICK: It's not?
24 MR MILLETT: I don't think it is. I will look at the
25 questions over the break and see how we might be able to

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1 make them a little bit more pointed, but there's a bit
2 of material to cover.
3 But if we go into tomorrow, which I think we will,
4 because I know there are further questions coming in
5 from beyond, we will not be at all long. I'm afraid we
6 will have to detain the witness overnight, it's
7 inevitable.
8 SIR MARTIN MOORE—BICK: All right. Thank you very much.
9 3.35, please.
10 (3.17 pm)
11 (A short break)
12 (3.35 pm)
13 SIR MARTIN MOORE—BICK: All right, are you okay?
14 THE WITNESS: Yeah.
15 SIR MARTIN MOORE—BICK: Thank you.
16 Yes, Mr Millett.
17 MR MILLETT: Thank you, Mr Chairman.
18 Ms Wray, can we please go to {CST0003112}.
19 Now, this is the email which you sent Carl Stokes on
20 24 April.
21 A. Yes.
22 Q. If you go, please, to page 1, very bottom of the page,
23 this is you to him, 24 April, at 9.34:
24 "Carl
25 "My understanding is that we do not have any blocks

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1 with external cladding of this nature. Are you able to
2 confirm please?
3 "I need to write back to the Director of Housing and
4 I think you are probably best placed to advise me on the
5 construction of our blocks."
6 You can see the subject matter there is the letter
7 from the LFB, and it's being forwarded on to him.
8 A. Yes.
9 Q. Now, you said before that you had no involvement or
10 knowledge of the cladding used in the refurbishment of
11 Grenfell Tower, but here you say, "My understanding is
12 that we do not have any blocks with external cladding of
13 this nature". Would that include the cladding on
14 Grenfell Tower?
15 A. I was referring to the spandrel panels at this point.
16 Q. I see.
17 A. And it was my understanding that we didn't have any of
18 those, but I think, as I said before, Carl had visited
19 Shepherds Court, and I think we'd already had some
20 discussions shortly after the fire about what the impact
21 potentially was on our stock.
22 Q. Right. So when you say "of this nature", do you mean
23 with spandrel panels?
24 A. Yes, I do.
25 Q. What made you think, then, of Grenfell Tower? Or was it

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1 the fact that Grenfell Tower also had spandrel panels on
2 it?
3 A. I think —
4 Q. Or might have.
5 A. I think that's what I was referring to. I'm confident
6 I was referring to spandrel panels, but I can see that
7 Carl's response is Grenfell was clad but the cladding —
8 so he's making it wider then at that point.
9 Q. What made you think that the recently clad
10 Grenfell Tower did not have relevant cladding on it such
11 as to make it fall into the category of none?
12 A. So, again, I was asking about spandrel panels, do we —
13 "My understanding is that we do not have any blocks with
14 external cladding of this nature", so external cladding
15 in terms of spandrel panels, "Are you able to confirm
16 please?", and then he's come back and said, "Grenfell
17 was clad but the cladding complied with the requirements
18 of Building Regulations, lots of questions asked of
19 Rydons and answered received back".
20 I probably — in between that, I may well have also
21 had a verbal — I might have had a phone call with him
22 as well just to further clarify.
23 Q. I was going to ask you, at what point in this email
24 chain did you ask him the question we saw you referred
25 to in your statement about whether or not the cladding

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1 complied with the Building Regulations?
 2 A. I can't recall. I mean, he would often — when
 3 I forwarded emails to him, he would often ring me if he
 4 was out on site in order to clarify or just to speak
 5 more about it, so it's likely that that happened, but
 6 I can't remember.
 7 SIR MARTIN MOORE—BICK: Do you mind my asking you to
 8 clarify: do you recall now what you understood then by
 9 the term "a spandrel panel"?
 10 A. I wouldn't be able to define it, but I would know
 11 visually what one looked like, in that they look like
 12 they're sort of a concrete surface but there's
 13 a different lining within. Because Shepherds Court is
 14 on Shepherd's Bush and I go to Westfield quite a lot, so
 15 I had looked at the building and I think I had some
 16 photographs, so I knew what I was meaning by it, but
 17 I wouldn't have been able to define the constituent
 18 parts.
 19 SIR MARTIN MOORE—BICK: Did you understand it to refer to
 20 a location or a material or what?
 21 A. A material. The panels usually just sat below the
 22 windows. It almost looked — not quite pebble dashed,
 23 it had a kind of visual appearance that I was familiar
 24 with, so I knew what they were referring to.
 25 SIR MARTIN MOORE—BICK: Yes. Thank you very much.

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1 Yes, Mr Millett.
 2 MR MILLETT: Yes, thank you.
 3 As you mentioned, Carl Stokes' response, three hours
 4 or so later on the same day, and you have just read it
 5 out, I don't need to do it again.
 6 Your reply was on 26 April at the top of page 1:
 7 "Thanks — got it now. (It was in SPAM)."
 8 When you received his email which you have referred
 9 to, "Grenfell was clad but the cladding complied with
 10 the requirements of the Building Regulations", did you
 11 know what questions he had asked of Rydons?
 12 A. I probably did at the time, and I would have been able
 13 to refer back to the significant findings and action
 14 plans, which would have had some of them. Again,
 15 I think that's probably something we discussed on the
 16 phone, but I didn't put in writing.
 17 Q. Did you know whom he had asked?
 18 A. No, I don't. I mean, when he went to site, he would
 19 communicate with — I used to get the Simons mixed up,
 20 either Simon Lawrence or Simon O'Connor. He would often
 21 report in to the site agent to let them know that he was
 22 in the vicinity, so he would ask questions of whoever
 23 was sort of in charge locally at the time, but then
 24 also, via the significant findings, through Claire, we
 25 addressed those to whoever was appropriate at Rydons.

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1 Q. Did you know the extent of any investigations he had
 2 done to assess the compliance of the cladding with the
 3 Building Regulations, as he says here?
 4 A. No, I didn't know the extent, no.
 5 Q. Did you not think that this was such a sweeping and
 6 unspecific response that it deserved a follow-up from
 7 you asking the questions I've just asked you: "What did
 8 you ask? Who did you ask? What answer did you get, and
 9 what investigations did you yourself conduct?"
 10 A. Yeah, it did, and I don't know why I didn't spend more
 11 time doing that. I would say that because the project
 12 had its own specialist team, with all sorts of
 13 consultants and engineers and fire safety people, that,
 14 you know, I had always been led to believe that all of
 15 that was being conducted within the project team, so it
 16 was almost looking for a kind of belt and braces
 17 approach. But I didn't follow it up and I should have
 18 done.
 19 Q. You say a belt and braces approach; what was the belt,
 20 if this is the braces?
 21 A. Well —
 22 Q. By which I mean: who else were you asking?
 23 A. Well, the information that we're getting from the
 24 project team via building control or all of the
 25 information that we have requested and has been assessed

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1 by the project team, so that when the project is
 2 concluded, I naturally assumed that everything was as it
 3 should be, everything was complied with, everything was
 4 specified appropriately, because that's why we had the
 5 specialists that we had. We had clerks of works, we had
 6 all sorts of people then looking at the how it was put
 7 together, so there was the issue about what was
 8 specified, the issue about the construction and then
 9 there is the sign-off for building control. So all of
 10 those people were contributing to my overall picture of,
 11 yes, this is being done the way that it should.
 12 Q. Well, if it's a belt, it's a very thin one, because this
 13 was, as I say, would you accept, such a sweeping and
 14 unspecific response that it couldn't reasonably be
 15 relied on by you in order to go back to the director of
 16 housing and give her a fully informed answer?
 17 A. You're right, it wasn't a fully informed answer.
 18 Q. So why were you content with this?
 19 A. It was an initial response. I was expecting to go back
 20 to the technical managers and ask loads more questions,
 21 particularly about how we were going to do the rest of
 22 it, how we were going to extract the information in
 23 order for the assessor to do his ongoing assessment of
 24 blocks where we had other major works, which had either
 25 recently been completed or were proposed, but at this

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1 stage I responded as I did.
 2 Q. You say you were expecting to go back to the technical
 3 managers and ask loads more questions; did you? We see
 4 no evidence of it.
 5 A. I think that I did start off the process by speaking to
 6 some of my colleagues, likely to have been in
 7 David Gibson's team, but I didn't put anything in
 8 writing, and it was going to be — but also it would
 9 have involved speaking to John Parsons, who had
 10 information in Keystone — it was going — it wasn't
 11 going to be a quick fix, and I knew that, so I had
 12 sort of started that process off at that stage.
 13 Q. You say this was the start of the process; help me with
 14 this, I'm not sure we've seen any documents that show
 15 that the process went any further than this.
 16 A. Well, not at this stage, no, it didn't, because —
 17 Q. Well, at what stage did it?
 18 A. So, we have our letter, they're very clear what they
 19 want us to adopt going forward. I sent a copy to all
 20 the technical people with responsibility and access to
 21 the information, and then I was going to follow that up
 22 with discussions with each of those managers and then
 23 refine how we can put that together. And, no, I didn't
 24 put it in writing, because at that stage I was trying to
 25 get their buy—in initially so that I could see what was

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1 going to be the most effective way of taking it forward.
 2 Q. You see, your question to Carl Stokes is about whether
 3 there are any blocks with spandrel panels in your stock.
 4 A. Yeah.
 5 Q. Now, leave aside whether that's the right question or
 6 not. His answer is Grenfell—specific. He says, "As far
 7 as I know that is correct", so he has answered your
 8 question. Then he has come back with something else.
 9 He says:
 10 "Grenfell was clad but the cladding complied with
 11 the requirements of the Building Regulations, lots of
 12 questions asked of Rydons and answers received back from
 13 them."
 14 Now, Carl Stokes obviously saw Grenfell as deserving
 15 of particular treatment. My question is: what did you
 16 do to investigate his investigation of that at any
 17 stage?
 18 A. I did not do anything to investigate his investigation
 19 of the work that the design team and the contract team
 20 were — specialists were doing.
 21 Q. My question again: why were you content with his bald
 22 assurance about Grenfell, given that he had come up with
 23 it, rather than asking him for some specifics about how
 24 he had arrived at what he is telling you there?
 25 A. Well, I think it's obvious that I could have spent more

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1 time on this, but I didn't, at the time. I understood
 2 that the project team had all the specialists in place,
 3 so I, in good faith, believed that they had everything
 4 that needed to be in place to specify, to construct, to
 5 have sign-off. My understanding was building control
 6 had signed off the building, so I thought what he was
 7 telling me seemed to accord with what my expectations
 8 would be for all of those specialists running
 9 a complicated project.
 10 Q. That was an assumption on your part, wasn't it?
 11 A. Yes.
 12 Q. So you didn't take any steps, just to be clear, as
 13 a matter of fact, to make sure that the project team put
 14 this letter from the LFB into the hands of the
 15 specialist fire engineers?
 16 A. No, I didn't, but I sent it to Peter Maddison, who was
 17 ultimately responsible for that project, and he would
 18 have — if he'd read it, he may well have decided to do
 19 that himself.
 20 Q. You have exhibited JW/20, which is your email to
 21 Robert Black and Barbara Matthews of the next day,
 22 27 April, {TMO10016666/2}.
 23 You say there:
 24 "Hi Robert
 25 "Apologies for the delay but I wanted to check with

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1 our Fire Risk Assessor before I responded to you.
 2 "I can confirm that it is our understanding that we
 3 do not have any blocks with cladding of the nature
 4 described in the LFB's letter (which was present at the
 5 Shepherds Bush tower block). Grenfell Tower did have
 6 external cladding panels fitted as part of the recent
 7 refurbishment work, however, our assessor investigated
 8 thoroughly the details of the installation with the
 9 contractor (Rydons) when the works were on site and he
 10 is able to confirm that this complies with the
 11 requirements of the current Building Regulations."
 12 Now, would you agree that you are here expressly
 13 providing reassurance to Robert Black and
 14 Barbara Matthews that the issues raised by Dan Daly in
 15 the external fire spread letter were not of a concern
 16 with regard to the Grenfell Tower refurbishment project?
 17 A. I'm advising them that our assessor investigated
 18 thoroughly with Rydons the details of the installation
 19 and that it has Building Regulations approval, so yes.
 20 Q. And you're advising them that this needed no further
 21 investigation, in effect; yes?
 22 A. I don't think I'm explicitly stating that.
 23 Q. Implicitly, though.
 24 A. Maybe implicitly.
 25 Q. Now, if you didn't know, as I think you confirmed

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1 before, the extent of Carl Stokes' investigations to
 2 assess the cladding, why did you tell Robert Black and
 3 Barbara Matthews that Carl Stokes had investigated
 4 thoroughly — "investigated thoroughly", your words —
 5 A. Yes.
 6 Q. — the details of the installation with Rydon?
 7 A. I knew that he had had extensive conversations with
 8 Rydons. Carl's a man who asks a lot of questions, so
 9 when he was on site, he would have asked quite a lot,
 10 not just about the fixings but about all sorts of
 11 aspects of the project, and what he didn't find answers
 12 to, he would put in the significant findings. So my
 13 understanding was at that stage he had asked all of the
 14 questions that he felt were appropriate, and he was
 15 content with the responses and with the approvals.
 16 Q. But you didn't actually know what he had actually done
 17 by way of actual investigation, did you?
 18 A. No, we established that, I hadn't asked him specific
 19 questions.
 20 Q. No. So you had no basis, did you, on which to represent
 21 to Robert Black or Barbara Matthews that Mr Stokes had
 22 investigated thoroughly?
 23 A. I didn't have the details, but I was absolutely
 24 confident that that degree of interrogation would have
 25 taken place.

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1 Q. You were confident that your assumption was justified,
 2 but you had no empirical basis on which to make that
 3 representation as a factual statement; yes?
 4 A. I can only reiterate that I knew from having spoken to
 5 him that he would have thoroughly investigated with
 6 Rydons and asked them lots of questions, which is what
 7 he said, "I've asked them loads of questions". What
 8 I don't know, as we've established, is what specific
 9 questions.
 10 Q. Can we just go back to the external fire spread letter,
 11 please, it's at {RBK00026888/2}. I just want to look
 12 with you, Ms Wray, at the final paragraph in that.
 13 It says there:
 14 "I would therefore strongly urge that you consider
 15 this issue as part of the risk assessment process for
 16 premises under your control. I suggest that you make
 17 sure all relevant information about any replacement
 18 window and facade schemes is fully available to fire
 19 risk assessors."
 20 Did you instruct Carl Stokes to consider that issue
 21 in the future as part of his fire risk assessment
 22 process?
 23 A. I believe I did, and he certainly had a copy of this
 24 letter, so he knew perfectly well that that was our
 25 expectation. I believe that I did.

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1 Q. Right.
 2 Can we then turn to the question of premises
 3 information boxes.
 4 Can we go, please, to {LFB00032335}. This is the
 5 bi-monthly meeting minutes of a meeting on 13 July 2016,
 6 attended by Rebecca Burton for the LFB and you for the
 7 TMO.
 8 If we go down to page 3 in that document
 9 {LFB00032335/3}, we can see the middle of the page,
 10 paragraph 7, there is a discussion about Grenfell Tower:
 11 "Further to previous discussions on the LFB's
 12 requirement for a Premises Information Box to be
 13 installed at Grenfell Tower, arrangements are in place
 14 for the documentation required to be available in
 15 a secure box in the lobby — the key to the box will be
 16 available from a key safe (secured by a FB padlock) in
 17 the bin room."
 18 Is it right that you updated Rebecca Burton that
 19 arrangements were in place for the information?
 20 A. Yes, my recollection is that the Fire Brigade had
 21 during — when the construction was still ongoing, had
 22 sort of indicated that they would — it would be helpful
 23 to have a premises information box. The works were
 24 still on site, and as they were nearing conclusion,
 25 Claire came up with an alternative, because apparently

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1 there was already a secure box in the lobby, and so
 2 I think they discussed — she discussed that, the
 3 opportunity to use that instead, and the arrangement for
 4 keeping the key and letting the Fire Brigade know, with
 5 an FB padlock so they could always access it. So that's
 6 how we ended up with that arrangement, I believe.
 7 Q. What were those arrangements that you're referring to
 8 there?
 9 A. As it says here.
 10 Q. What information was actually in the secure box in the
 11 lobby at this point?
 12 A. I don't actually know, because it was put in place by
 13 the project team and Claire took charge of it.
 14 Normally — previously when we'd had a premises
 15 information box, at Trellick and in sheltered schemes,
 16 my team had been involved in procuring the boxes and
 17 getting it installed and making sure we agreed with
 18 the Brigade what was in them, but in this case, because
 19 the project was in place and because the information
 20 they were requesting wasn't stuff I necessarily had
 21 access to, for example AOV information, then Claire led
 22 on this.
 23 Q. Why wasn't there a premises information box in the end
 24 put in the lobby at Grenfell?
 25 A. Well, I believe because they already had a secure —

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1 what I'm being told is they already had a secure box
 2 which they felt fulfilled that purpose.
 3 Q. Did you ever check for yourself that the secure
 4 information box had been installed?
 5 A. No, I didn't.
 6 Q. Did you ever ask anybody to do that for you?
 7 A. I'm not sure whether I did, to be honest, but
 8 I certainly would have asked Claire for reassurance that
 9 it was in place and that the information the Brigade had
 10 asked for was in there.
 11 Q. What did she tell you?
 12 A. She must have confirmed that it was there or it was
 13 imminently about to be there.
 14 Q. Do you actually remember you asking her and her telling
 15 you that?
 16 A. Yeah, I'm sure we had that conversation.
 17 Q. Being confident that you did is not quite the same as
 18 actually remembering it. I don't think we've seen
 19 anything in your statements or in hers about that.
 20 A. I believe that I did, but I probably can't evidence it,
 21 so ...
 22 Q. What was the documentation provided in the secure box?
 23 A. Again, that will be from what the Fire Brigade requested
 24 and what Claire had provided. I don't know in this case
 25 because I didn't lead on this one, otherwise I could

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1 tell you.
 2 Q. Now, we know that on the night of the fire, and this has
 3 been the subject of evidence earlier on in this Inquiry,
 4 there were no plans of Grenfell Tower in any box in the
 5 lobby or anywhere else in the building that the LFB
 6 could access. You may remember that evidence given by
 7 Assistant Commissioner Roe. Can you explain why that
 8 was the case?
 9 A. No, I can't, and I can only really refer you back to
 10 Claire and to the project team, because I wasn't
 11 involved in putting any in. I can tell you all about
 12 Trellick Tower because I dealt with that, but I didn't
 13 on this issue, it was led from the project team.
 14 Q. So you can't help me as to why there was no premises
 15 information box or any secure box at Grenfell Tower
 16 which contained even the plans of the building that the
 17 Fire Brigade could access on the night of the
 18 Grenfell Tower fire itself?
 19 A. No, because I would have happily installed a premises
 20 information box, but I was advised by the project team
 21 that there was already a secure box available that they
 22 could — that that — that could store that information.
 23 Q. Now, I'd like to ask you about the LFB and some of their
 24 concerns about Carl Stokes.
 25 Can we start with your witness statement number 1,

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1 please, at page 31 {TMO00000890/31}, paragraph 139.
 2 You say in the middle of the page there:
 3 "Throughout the entirety of our working relationship
 4 I never had any concerns regarding Carl Stokes'
 5 competence. I was aware that he elected not to be on
 6 many of the professional registers, however when
 7 I raised this with him he assured me that he did not
 8 feel he would gain anything from these memberships. He
 9 nevertheless assured me that he proactively arranged his
 10 own continuing professional development. I was aware
 11 that Carl regularly attended seminars, legal updates and
 12 briefings in fire safety as he would often provide me
 13 with feedback and a summary of the information presented
 14 and outline any potential impact it might have on the
 15 TMO."
 16 Then in paragraph 158 at the top of page 36
 17 {TMO00000890/36}, you say in the fourth line:
 18 "... I do not recall the LFB ever making any
 19 comments of such significance that we had any reason to
 20 doubt the suitability and competency of Carl Stokes or
 21 the FRAs prepared by him."
 22 A. Yeah, and there's —
 23 Q. "I am confident that if any issues were raised about the
 24 FRAs we discussed these with Carl Stokes and the
 25 recommendations made were always taken on board."

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1 I have a question.
 2 A. Okay.
 3 Q. Do you remember concerns about being raised to you or
 4 with you about Carl Stokes' competence by members of the
 5 LFB?
 6 A. Yes, by Rebecca, and I don't know why I didn't include
 7 that in my statement, it blindsided me. Rebecca Burton
 8 had raised concerns about the time of the Adair fire,
 9 and I recall there were, I think, a couple of specific
 10 points. One was that Carl referred to meetings he'd had
 11 with senior LFB officials but wasn't able to evidence
 12 them and therefore they shouldn't have been included.
 13 And I think the other was about — there was a sort of
 14 feeling that instead of just sticking to the most
 15 appropriate guide for a building, that maybe he referred
 16 to two, when really the appropriate thing to do was to
 17 choose the most effective guidance and use that as your
 18 base.
 19 Q. Right.
 20 Well, just to start with, you say that this
 21 statement in here shouldn't have been made and it
 22 blindsided you. When did you first realise that this
 23 statement, paragraph 158, was wrong?
 24 A. Apologies, I think when I re-read it recently,
 25 I realised that I had omitted to include the issues that

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1 Rebecca — sorry, I meant to say at the beginning and
 2 I must have forgotten.
 3 Q. Okay. All right.
 4 A. Sorry.
 5 Q. I think we might be able to take it quite quickly, in
 6 light of that.
 7 First, can we look at Rebecca Burton's own second
 8 witness statement to the Inquiry, because it might
 9 shorten matters with her.
 10 {LFB00084098/9}, paragraph 16, bottom of the page,
 11 if we can scroll down to that. She refers to the
 12 meeting of 13 November 2015 which was arranged to
 13 discuss the Adair Tower deficiency notice.
 14 If you look at what she says in the fifth line
 15 there, she says this:
 16 "I was very frank and told her that I did not think
 17 that he [Carl Stokes] was providing a good service to
 18 the KCTMO, as illustrated by the quality of the FRA for
 19 Adair Tower, which was mirrored in the FRA for its
 20 sister tower, Hazlewood Tower, which I had also reviewed
 21 following the Adair Tower Fire."
 22 Do you remember that she raised that issue with you
 23 at the meeting?
 24 A. Yes, I do.
 25 Q. And you understood it to relate to concerns about

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1 Carl Stokes?
 2 A. Yes, I did.
 3 Q. Do you remember any specific concerns that she raised?
 4 A. As I say, there was the one issue about reference to
 5 meetings with senior LFB officers that weren't evidenced
 6 and she felt couldn't be evidenced, and there was the
 7 other one about whether he was always using the most
 8 appropriate guide or whether he was maybe potentially
 9 cherry-picking.
 10 I think in relation to Adair and Hazlewood, there
 11 was also an issue about self-closers. Yeah. And there
 12 may have been others, but those were the issues.
 13 Q. Now, let's go to {LFB00003445}.
 14 This is an email from Rebecca Burton to
 15 Spencer Sutcliff of 5 May 2016, where she summarises to
 16 him the meeting of 13 November 2015 that we've just been
 17 looking at in her statement.
 18 You can see what she says. She says:
 19 "Hi Spencer,
 20 "Please see below an update relating to the Action
 21 Plan following the Post Fire Review on Adair Tower."
 22 Then under "Action Plan":
 23 "Meeting arranged with TMO Health & Safety Manager
 24 Janice Wray for 13th November to discuss items ..."
 25 That was in relation to the meeting which had

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1 occurred the previous November, isn't it, clearly?
 2 A. Yes.
 3 Q. Then if you look at the bullet points under that,
 4 they're in a slightly different text, they're in blue,
 5 she says:
 6 "During the meeting with Janice Wray on
 7 13th November 2015 I discussed the following areas of
 8 concern that had arisen following the fire at
 9 Adair Tower:—
 10 "— TMO's approach to reviewing risk assessments and
 11 acting on significant findings in a timely manner.
 12 "— Suitability of Fire Risk Assessments particularly
 13 regarding approach to flat front doors and self-closers.
 14 "— Claim within the Fire Risk Assessment that fire
 15 safety regulation had agreed self-closing flat front
 16 doors are not required.
 17 "— Apparent lack of systems in place to prevent the
 18 hindrance of access to DRM during maintenance works.
 19 "— Fire Risk Assessments not demonstrating an
 20 understanding of the strategy for the building and how
 21 persons will be kept safe in event of fire.
 22 "It was agreed at this meeting that Janice Wray
 23 would consider each of these points and discuss with
 24 their Fire Risk Assessor improvements that could be
 25 made."

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1 A. Yes.
 2 Q. Do you remember her raising those specific issues with
 3 you?
 4 A. Yes, I do.
 5 Q. And do you remember agreeing that you would speak to
 6 Carl Stokes about the improvements that could be made in
 7 each case?
 8 A. Yes, and I did.
 9 Q. Did you speak to Carl Stokes after the meeting of
 10 13 November?
 11 A. I did.
 12 Q. And was there a note of that meeting?
 13 A. No. I spoke to him, I thought it was an important
 14 meeting to have face-to-face, and I should have kept
 15 a note of the meeting, but, yeah, I raised all of the
 16 issues that Rebecca had raised, and I think suffice to
 17 say that once we had completed the works for the
 18 enforcement notices, it required the Brigade's approval
 19 of the fire risk assessment, the reviewed fire risk
 20 assessment, for the works to be signed off, and that was
 21 reviewed. So I feel that reflects the fact that he had
 22 taken on board the concerns which were raised.
 23 Q. Did you provide an update to Rebecca Burton?
 24 A. She didn't ask for one, and she would have raised it
 25 again — I mean, we were in pretty frequent dialogue

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1 about all sorts of things, and I probably — I'm sure
 2 I advised her, as it says here, that I would address it,
 3 and I feel like I did address it.
 4 Q. Can we go to {TMO10011001}, please.
 5 This is an email that you sent to Robert Black and
 6 Barbara Matthews on 13 November 2015 after your
 7 meeting —
 8 A. Yeah.
 9 Q. — with Rebecca Burton on 13 November 2015 at 17.52. It
 10 says:
 11 "Robert, Barbara & Sacha,
 12 "As you know I met with Rebecca Burton this morning
 13 to seek clarification on the LFB's response to the fire.
 14 She advised that there are certain 'trigger' events that
 15 cause the LFB to undertake a 'review' following a fire.
 16 In the case of Adair there were two 'trigger' factors —
 17 "1. Fire survival calls — where a number of
 18 residents called the LFB call centre for advice on what
 19 action to take AND
 20 "2. People rescued from balconies ..."
 21 Halfway down the page, if we scroll down a bit more,
 22 please, you go on to say:
 23 "Rebecca confirmed that the concerns/questions she
 24 had were as follows —
 25 "1. Were the original windows on the means of

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1 escape staircase openable? ...
 2 "2. Rising butt hinges ...
 3 "3. Dry rising firefighting main ..."
 4 If you look through what you say there, we see
 5 nothing in there, and indeed on page 2 either, of the
 6 concerns that Rebecca Burton had raised about
 7 Carl Stokes with you earlier that morning.
 8 A. Yeah, and you won't do, because this was an update on
 9 the position specifically in relation to Adair and
 10 the Brigade's position on Adair. I spoke to Barbara
 11 about them at length, which, as my line manager, that's
 12 what I would always do.
 13 Q. Do you mean by that answer that you spoke to
 14 Barbara Matthews orally about the concerns that —
 15 A. Yes.
 16 Q. — Rebecca Burton had raised with you about Carl Stokes?
 17 A. Yes, and what I was proposing to do about them.
 18 Q. Right. But you didn't make a record of it?
 19 A. No.
 20 Q. Why is that?
 21 A. Just time, really. I knew I was dealing with it and
 22 I knew Barbara would hold me to account and ask me for
 23 updates, so it was just time, unfortunately.
 24 Q. Right.
 25 Can we then go to the bi-monthly meeting of

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1 5 January 2016. This is the day before the scrutiny
 2 meeting held by RBKC. This is at {LFB00032330}.
 3 Just look at the first page to begin with to
 4 identify the document. We can see who is present: you
 5 are present, Rebecca Burton is present, and
 6 Claire Williams is also present on this occasion.
 7 It says on page 3 {LFB00032330/3}, point 8, bottom
 8 of the page, "Risk Assessments":
 9 "Rebecca raised her concern that our Fire Risk
 10 Assessor sometimes makes statements which are not
 11 justified or supported and that FRA reports need to
 12 include justification for statements made. In
 13 particular, reference to discussion with senior LFB
 14 officers must provide names, dates and confirmation of
 15 outcome of discussions etc. Also, in relation to
 16 Balfour the FRA needs to be reviewed to clearly
 17 demonstrate that the impact of the missing doors in
 18 front of the hopper head area ..."
 19 Then it goes on, in the second line at the top of
 20 page 4 {LFB00032330/4}:
 21 "Janice agreed to raise these issues with our
 22 assessor but did comment that we have frequently
 23 provided copies of FRAs to the LFB in recent years and
 24 until now these have been well received, considered to
 25 be comprehensive and no criticism had been fed back."

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1 Do you remember these concerns being raised at this
 2 meeting?
 3 A. Yes, I do.
 4 Q. Did you agree with them?
 5 A. I think one of them I already mentioned to you in
 6 relation to reference to meetings with LFB colleagues
 7 that there were no minutes for, so that's probably
 8 a fair comment, actually.
 9 Q. Yes. And did you raise these concerns with Carl Stokes
 10 again?
 11 A. Yes, I did.
 12 Q. So this is the second time you have had to go back to
 13 him with complaints made by the LFB about his work?
 14 A. Yeah.
 15 Q. Did that not concern you, that it's now the second time
 16 that the LFB are picking him up or picking you up on his
 17 quality?
 18 A. It didn't worry me excessively, because the point I'm
 19 trying to make is that quite a lot of disparate LFB
 20 officers over quite a long period have requested and had
 21 copies of the fire risk assessments, and in a number of
 22 occasions they would come back and say, "This seems to
 23 be broadly compliant". So I'm more than happy to
 24 address the concerns that have been flagged, and I'm
 25 sure that they're legitimate, and I felt that it was

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1 something that we could deal with.
 2 Q. Sorry, I'm not sure I follow.
 3 Rebecca Burton has now had two occasions in the
 4 previous 12 months to tell you that she didn't think
 5 that the work of your fire risk assessor was
 6 satisfactory.
 7 A. Yes.
 8 Q. That's factually correct.
 9 A. It is.
 10 Q. Did the fact that this is now rearing its head for
 11 a second time not concern you?
 12 A. I think the points she was making were legitimate and
 13 I was going to be able to address them and had already
 14 started to address them at that stage. The point I'm
 15 making is that, over a long period, we'd been regularly
 16 providing copies of the fire risk assessments to a range
 17 of her predecessors and her team and issues weren't
 18 being escalated.
 19 Q. What does that tell us?
 20 A. Well, it tells me that —
 21 Q. Are you saying that Rebecca —
 22 A. Sorry.
 23 Q. No, go ahead.
 24 A. It tells me that the Fire Brigade were receiving copies
 25 of our risk assessments over a long period, a whole

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1 range of inspecting officers, and in some cases they
 2 would come back and say they were broadly compliant,
 3 they weren't coming back and raising issues, so clearly
 4 there's an issue now, but my point is there wasn't
 5 a sustained history of concerns being flagged.
 6 Q. Yes, and do I take from that that you are really telling
 7 us that you regarded Rebecca Burton as perhaps
 8 exceptional in picking up issues that no one had
 9 previously picked up?
 10 A. No, I'm just making the point that there isn't a whole
 11 history here of discontent and complaints that were not
 12 dealt with, that wasn't the case. These are raised now
 13 and I'm dealing with them now, but they hadn't been
 14 raised previously.
 15 Q. When she raised it with you for the second time on
 16 5 January 2016, did you not wonder to yourself why it
 17 was that Carl Stokes perhaps was still producing
 18 material that was unsatisfactory, you having already
 19 taken back to him the discussion that you had had with
 20 Rebecca Burton at the 13 November 2015 meeting?
 21 A. Okay. I think that one of the reasons that this was
 22 being raised at this meeting was so that it would be
 23 minuted, so that we would have a formal audit trail, and
 24 it was legitimate to raise it. If she had concerns, it
 25 was right and proper that she raise it so that we can

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1 deal with them.
 2 Q. Did you tell Barbara Matthews or anybody else at the TMO
 3 or indeed RBKC that the LFB had raised these concerns
 4 about Carl Stokes, indeed for the second time?
 5 A. I certainly told Barbara Matthews. I think she probably
 6 gets copies of the liaison meeting, but I would have
 7 spoken to her about them as well.
 8 Q. I see.
 9 Now, do you remember that, a month later, on
 10 17 February 2016, you were copied in to an email by
 11 Charlie Saul about a complaint made by a gentleman
 12 called Martin Dunne?
 13 A. Yeah.
 14 Q. You do. Let's look at the document, {CST00027221/2}.
 15 This is an email from Martin Dunne to
 16 Benjamin Scantlebury and Charlie Saul, 17 February 2016:
 17 "Dear Mr Scantlebury
 18 "Thank you for a copy of the kctmo Fire Risk
 19 Assessment for the common parts of your residence ..."
 20 Now, Martin Dunne was at Firecare 999.
 21 A. Yeah.
 22 Q. What was that organisation?
 23 A. So the gentleman who this is directed to was
 24 a leaseholder who wanted to install a stairlift in the
 25 communal staircase of the building, and I think we had

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1 gone through the occupational therapists and the
 2 assessment by our property people was that, because it
 3 was a communal staircase that led to two flats, it would
 4 reduce the width and so we weren't able to agree that it
 5 could proceed. Mr Scantlebury was obviously very keen
 6 to proceed with it —
 7 Q. Yes, sorry —
 8 A. — so he engaged his own assessor to review the
 9 assessment. Sorry.
 10 Q. So who was Martin Dunne of Firecare 999? Was he a fire
 11 risk assessor?
 12 A. Yes, he was, and I think we may have interviewed him
 13 whenever we were — when we were selecting —
 14 Q. Focusing on the second paragraph, he says:
 15 "I have copied in your ... Landlord as a matter of
 16 urgency as the Fire Risk Assessment which was conducted
 17 by Carl Stokes on 7th January 2016 is unsuitable and
 18 insufficient as the elementary fire safety deficiencies
 19 have not been identified by the fire risk assessor."
 20 If we go up to page 1 of this email chain
 21 {CST00027221/1}, we can see from the same chain that you
 22 were chased on 1 July 2016 by Raymond Hylton for
 23 a response to this. Do you see that at the foot of the
 24 screen?
 25 A. Yes.

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1 Q. "Hi Janice
2 "We still have this matter outstanding, which is now
3 an open complaint."
4 Yes?
5 A. Yes.
6 Q. Had you done anything about the complaint in the
7 intervening six-month period?
8 A. Yes, yes, I would have done.
9 Q. What?
10 A. I mean, I would have sent a copy to Carl and got his
11 comments, and I would likely have fed them back to
12 Raymond, but it seems that I didn't. So I can't
13 remember the detail. I remember the case because it was
14 difficult.
15 Q. Let's look and see what you say.
16 Look up the screen, please, higher up page 1. You
17 write to Carl Stokes on 1 July 2016 and say:
18 "C
19 "This has reared its head again and it seems we
20 need to respond. I have added the comments you made
21 initially on this below and some of my own but would be
22 grateful if you could take a look and add any additional
23 comments we can include to beef up our response."
24 Then he comes back to you the same day and says:
25 "J

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1 "See the attached, I have forwarded it as a word
2 document so that you can use whatever you want."
3 You say "reared its head again"; it looks from that
4 that you had already discussed this with Carl Stokes
5 previously.
6 A. Yes, and I would have thought I would have responded
7 previously because it was a difficult situation to deal
8 with.
9 Q. It looks as if you didn't.
10 A. It does look as if I didn't.
11 Q. Were you not concerned by this complaint?
12 A. Yes, I was concerned, but there was a kind of bigger
13 picture in terms of what the gentleman wanted to achieve
14 and so he was trying to find — he was going to go out
15 of his way to find people who would disagree or
16 hopefully achieve what he wanted.
17 Q. Right.
18 Did you raise with Barbara Matthews or anybody else
19 at the TMO more senior to you that a complaint had been
20 raised about Carl Stokes' fire risk assessment by
21 a fellow professional?
22 A. I can't recall if I did. I may well have done but
23 I can't recall.
24 Q. Right.
25 Can we look at {CST00009576}. This is an email from

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1 Carl Stokes on 25 February 2016, earlier in the year,
2 and Carl Stokes, second email down, says to you,
3 25 February 2016:
4 "J
5 "Did you mention to Barbara what the exnova[sic]
6 woman said about the FRA. I am thinking after the
7 Firecare 999 blocks[sic] comments.
8 "Just so she knows that they are OK.
9 "Carl."
10 Was this in relation to the complaint from
11 Martin Dunne or was this about something else?
12 A. I presume it was the complaint from Martin Dunne but
13 I don't recollect.
14 Q. Do you know who the "exnova woman" was?
15 A. Well, I'm thinking it must be Cate Cooney, because that
16 would be at the time that we had engaged
17 Exova Warringtonfire to advise us on our required
18 approach to the ventilation changes required by the
19 enforcement notice at Adair and Hazlewood Towers, so
20 I — but I've no idea what he's referring to. I'm
21 assuming it's Cate Cooney.
22 Q. Right. Do you know what the "exnova woman" had said
23 about the FRA?
24 A. No, sorry, I really have no recollection.
25 Q. We can see you respond the same day:

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1 "Hi
2 "Haven't spoken to her since Exova visit — will
3 probably brief her early next week but intend to mention
4 her comment. You needn't worry she is quite a supporter
5 of you and already thinks Firecare999 is outrageous and
6 needs to butt out.
7 "J."
8 So did you raise the complaint with Barbara Matthews
9 the following week or did you just regard it as
10 a nuisance?
11 A. No, I would have briefed her.
12 Q. What did she say?
13 A. Sorry, at this stage I've no idea, but I clearly would
14 have briefed her. She was involved in quite a lot of
15 things we were doing, so I would have made sure she was
16 aware.
17 Q. Was any action taken by the TMO in respect of
18 Carl Stokes' contract at that point?
19 A. No, but it was — we were — Barbara and I were talking
20 about re—procuring and we were starting to have that
21 debate with procurement people.
22 Q. Well, yes, indeed. I'm going to come on to that right
23 now, actually.
24 Can we then move to June 2016 and the annual health
25 and safety report. This is at {TMO10024405}.

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1 This is the annual report for the year 1 April 2015
 2 to 31 March 2016, as you can see, and this was drafted
 3 by you, wasn't it?
 4 A. Yes.
 5 Q. Yes.
 6 Can we go to page 7 {TMO10024405/7}, please, and
 7 look at paragraph 7.9. You can see there, "Fire Risk
 8 Assessments (FRAs)":
 9 "Comprehensive Fire Risk Assessments ('suitable &
 10 sufficient' as required by the legislation) are in place
 11 for all blocks which have communal areas and our ongoing
 12 review programme continues. These FRAs are undertaken
 13 and recorded in line with best practice (PAS79) and
 14 low-level reviews are undertaken between the
 15 comprehensive reviews. This is set out in our Fire
 16 Safety Policy & Strategy document. As required by the
 17 programme, two hundred and ninety-nine comprehensive
 18 reviews were completed in this period."
 19 There is a box which states the same thing.
 20 There is no mention here, or, so far as we can see,
 21 anywhere else in this report, of the concerns raised by
 22 Rebecca Burton twice in that year or Martin Dunne.
 23 A. There isn't.
 24 Q. There is not. Why is that?
 25 A. I can't give you an explanation.

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1 Q. There should have been, shouldn't there?
 2 A. Yes. Well, I mean, I've raised it with my line manager,
 3 who is the executive director with health and safety
 4 responsibility, and we've taken action, so I suppose
 5 I thought I've acted upon this and I think I've dealt
 6 with it, so I didn't think to raise it. It must be
 7 an oversight on my part.
 8 Q. Well, it's quite a big oversight, isn't it? It's not
 9 just an accidental thing that's happened. You have had
 10 three warnings, two from the LFB themselves and one from
 11 a fellow professional. Are you able to explain how that
 12 oversight came about?
 13 A. But I've taken action. I haven't ignored them, I've
 14 addressed them.
 15 Q. No, sorry, the oversight not in relation to you dealing
 16 with them, but in relation to you reporting them.
 17 A. No, I can't give you any other explanation, I'm sorry.
 18 Q. This document, would you remind me, please, where this
 19 would have gone? It would have gone, presumably, to the
 20 executive team?
 21 A. Yes, and —
 22 Q. And the board?
 23 A. I think it went to board. It may have gone to one of
 24 their other committees at board level, but I thought it
 25 went to board, and it would have gone to the corporate

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1 health and safety manager at RBKC.
 2 Q. Indeed.
 3 A. And anybody else who wanted it.
 4 Q. Indeed. Indeed. So unless you had put into this
 5 document the fact that two third parties had separately
 6 expressed concerns about the quality of your fire risk
 7 assessor's work, those third parties, the boards of TMO
 8 and RBKC, would not have any idea that that had
 9 happened, would they?
 10 A. No. Barbara knew and she possibly discussed it with
 11 Robert, so the executive team would have had some
 12 oversight, but no.
 13 Q. No.
 14 Now, if we go on in the document to page 18
 15 {TMO10024405/18}, you can see there, halfway down the
 16 page, there is a paragraph 15.2, "Fire Safety":
 17 "KCTMO gives fire safety a high level of priority
 18 and the commitment goes beyond the need to be compliant.
 19 In particular, KCTMO has developed a good working
 20 relationship with the LFB which is mutually beneficial."
 21 Et cetera, et cetera, and in the middle of that
 22 section of text, you say, under the bullet points:
 23 "Additionally, we will be re-procuring Fire
 24 Consultancy and Fire Risk Assessment Services."
 25 Did that mean that you would be re-procuring

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1 Carl Stokes' position?
 2 A. That was the intention, I believe, at that point. I had
 3 raised with Barbara that we hadn't done any procurement
 4 for a while, but we also needed to be mindful of the
 5 additional services that he was undertaking for us, and
 6 so I think her — I believe her view was that I should
 7 go ahead and start speaking to our procurement people,
 8 and I've certainly seen some emails between myself and
 9 my colleague Ernest Raw where we'd identified the list
 10 of services we were going to require. So that sort of
 11 got kicked off, but it stalled at some stage, I think.
 12 Q. You hadn't done any procurement for a while; in fact,
 13 you had done no procurement since 2010, had you?
 14 A. Well, that's the whole point of the discussion with
 15 Barbara, yes.
 16 Q. Indeed.
 17 So, in a nutshell, is it the case that you were
 18 thinking of re-procuring Carl Stokes' position because
 19 of the lapse of time since the last procurement
 20 exercise?
 21 A. It was appropriate. We probably should have visited it
 22 earlier, but just pressure of work meant that it hadn't
 23 come to the top of the agenda, and now it had, and we
 24 needed to investigate properly what the next steps were,
 25 so that's what I was doing with our procurement

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1 colleagues.
 2 Q. Are you quite sure that this was nothing to do at all
 3 with the fact that Rebecca Burton of the LFB had raised
 4 concerns about his competence twice, and a fellow
 5 professional had raised concerns about his competence on
 6 another occasion?
 7 A. No, that wasn't my view. I believed, as I've said
 8 already, that we had taken action and spoken to Carl
 9 about those issues and he addressed them, so no. But it
 10 was beyond timely to re—procure and so we were looking
 11 at it.
 12 Q. Did you in fact undertake a re—procurement?
 13 A. No. I spoke to my colleague, we got as far as setting
 14 out the activities that Carl was undertaking for us, and
 15 my recollection is my colleague went off to do some work
 16 on it and then — and I had further conversations with
 17 Barbara, and it didn't at that stage get taken forward,
 18 and I don't know what the plan was going to be. It was
 19 sort of — I was looking for a lead, really.
 20 Q. We've seen no discussion about re—procurement at either
 21 the health and safety committee or the TMO executive
 22 team or the TMO board. Would that be right, there was
 23 no discussion so far as you knew of that topic within
 24 those groups?
 25 A. To the best of my knowledge, you may well be right.

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1 I mean, I report to Barbara, so we were having those
 2 discussions and she was giving me a steer about what
 3 action she wanted me to take, and I was taking those
 4 actions and then going back to her and waiting to be
 5 guided with what was next.
 6 Q. Can I ask you to look, please, at paragraph 143 of your
 7 first statement, page 32 {TMO00000890/32}.
 8 You say at paragraph 143, in the second sentence in
 9 the paragraph:
 10 "There was an assumption made by Carl and myself
 11 that arrangements at our premises which were not
 12 negatively commented on by the LFB following audit were
 13 deemed by them to be satisfactory."
 14 Why did you make that assumption?
 15 A. I think it was probably more Carl's assumption than
 16 mine. I think it's reasonable, when they're doing
 17 a visual inspection, that anything that's obviously
 18 within the communal area that, you know, can be
 19 observed, if there are any concerns, then I think it's
 20 reasonable that if they're not being highlighted, to
 21 kind of assume that they weren't highlighted as
 22 a deficiency and they're not raised as a minor
 23 deficiency, then I think that's reasonable. I think
 24 Carl's assumption went beyond that to kind of a wider
 25 range of areas.

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1 Q. To be clear, you had not made a specific agreement with
 2 the LFB, had you, that their silence signified their
 3 approval?
 4 A. No, no, nothing like that, and, to be honest, there was
 5 often a different way that the individual fire officers
 6 approached their inspections and audits, so it wouldn't
 7 be reasonable to have that.
 8 Q. Did you think after the meeting with Rebecca Burton on
 9 5 January 2016 that that approach was still appropriate?
 10 A. To be honest, I didn't pay a lot of mind to it. It was
 11 for us to do our assessments and get our actions
 12 undertaken, and the whole purpose of the liaison meeting
 13 was to have regular dialogue and raise any points that
 14 need clarity with the Brigade.
 15 Q. And you quote extensively from Carl Stokes' FRA of
 16 20 June within paragraph 143, and where he identifies no
 17 adverse comments, and then says, three lines up from the
 18 bottom of your page 32 {TMO00000890/32}:
 19 "Therefore it has been assumed that the
 20 Fire Authority were completely satisfied with these
 21 arrangements at the time of the audit and there have
 22 been no changes to the residential part of this premises
 23 or the TMO's management policies or procedures since the
 24 above Fire Safety audit was undertaken."
 25 Now, that was the same expression that Carl Stokes

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1 had included in all of his fire risk assessments since
 2 his October 2014 fire risk assessment for
 3 Grenfell Tower, isn't it?
 4 A. Mm—hm.
 5 Q. As far as we've seen. So is it right that nothing had
 6 changed after your meetings with Rebecca Burton in
 7 November 2015 and January 2016?
 8 A. That wasn't the bit she was referring to. It was about
 9 meetings with the Fire Brigade, where he'd made comments
 10 that he'd met with the head of policy or somebody quite
 11 senior in the Fire Brigade and referenced conversations
 12 without being able to include any minutes, and then on
 13 further investigation there didn't appear to be any
 14 minutes or there may have been a miscommunication or
 15 a difference of view. So that's what her issue was.
 16 Q. It's right, isn't it, that you never picked Carl Stokes
 17 up on this generic statement, the effect of which was
 18 that he could tell from the LFB's non—statement that
 19 they were satisfied?
 20 A. Erm —
 21 Q. You never picked him up on that?
 22 A. No, I didn't, and, to be honest, I didn't really think
 23 it was a big issue. If they have an issue, they'll
 24 raise it, whether it be in a deficiency notice,
 25 an enforcement notice or whatever, and that's completely

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1 legitimate. Clearly I didn't think we could rely on
 2 that version of events, but I didn't think it was a big
 3 deal to include it.
 4 MR MILLETT: Mr Chairman, it's 4.30.
 5 SIR MARTIN MOORE—BICK: Yes.
 6 MR MILLETT: I haven't finished, as you can probably tell.
 7 I'm very close to the end, but I won't be able to finish
 8 my questions within a reasonable time after 4.30 this
 9 evening, I am afraid. I apologise. But we are actually
 10 a day ahead anyway in relation to the time estimate for
 11 this witness.
 12 SIR MARTIN MOORE—BICK: All right.
 13 MR MILLETT: That's by way of defence.
 14 SIR MARTIN MOORE—BICK: Just for Ms Wray's benefit and for
 15 the benefit of the rest of us, how long do you think you
 16 might require her here tomorrow?
 17 MR MILLETT: I think my own questions will not require more
 18 than an hour, and I'm confident that it will be a good
 19 deal less than that. That is the outer estimate. We
 20 then need the normal break and the follow-up questions.
 21 SIR MARTIN MOORE—BICK: Yes.
 22 MR MILLETT: But I would be confident also in assuming that
 23 many of the follow-up questions, certainly from today,
 24 will arrive overnight and won't require a longish gap
 25 tomorrow.

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1 SIR MARTIN MOORE—BICK: All right.
 2 Well, Ms Wray, I had hoped that we were going to
 3 finish your evidence today, and perhaps you did as well,
 4 but I'm afraid it's not been possible. We lost a bit of
 5 time this morning, as you know, and things don't always
 6 go precisely according to plan, so I will have to ask
 7 you to come back again tomorrow. But, as you have
 8 heard, Mr Millett doesn't think we shall be troubling
 9 you for too long.
 10 THE WITNESS: Okay.
 11 SIR MARTIN MOORE—BICK: So we will break now, and we'll
 12 resume, please, at 10 o'clock tomorrow morning.
 13 As usual, please don't talk to anyone about your
 14 evidence over the break. All right?
 15 THE WITNESS: Okay. All right. Thank you.
 16 SIR MARTIN MOORE—BICK: Thank you very much.
 17 (Pause)
 18 Thank you very much, Mr Millett. 10 o'clock
 19 tomorrow, then, please.
 20 MR MILLETT: Thank you, Mr Chairman.
 21 (4.32 pm)
 22 (The hearing adjourned until 10 am
 23 on Wednesday, 16 June 2021)
 24
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