

OPUS2

Grenfell Tower Inquiry

Day 163

July 19, 2021

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Monday, 19 July 2021

1
2 (10.00 am)
3 SIR MARTIN MOORE–BICK: Good morning, everyone. Welcome to
4 today's hearing. Today we're going to hear evidence
5 from more people who were concerned with the lifts at
6 Grenfell Tower.
7 Yes, Mr Kinnier.
8 MR KINNIER: Thank you, sir. May I call Gary Poynter.
9 MR GARY POYNTER (affirmed)
10 SIR MARTIN MOORE–BICK: Thank you very much.
11 Now, do sit down, make yourself comfortable.
12 There's water there if you'd like some.
13 THE WITNESS: Yes. Thank you.
14 SIR MARTIN MOORE–BICK: All right?
15 THE WITNESS: Yeah.
16 SIR MARTIN MOORE–BICK: Yes, Mr Kinnier, when you're ready.
17 Questions from COUNSEL TO THE INQUIRY
18 MR KINNIER: Thank you, sir.
19 Would you please confirm your name for the record.
20 A. Gary Lee Poynter.
21 Q. Mr Poynter, thank you for attending today.
22 Three things before we start.
23 First of all, if at any time during the examination
24 you require a break, please say so, that's not
25 a problem.

1

1 Secondly, if you would please keep your voice up,
2 that's to enable the shorthand writer to catch
3 everything you say and capture it accurately. Also,
4 please don't nod; say "yes" or "no" as the case may be,
5 so she can capture it.
6 Finally, my questions are intended to be short; if
7 they're not, or they're not clear, please say so and
8 I'll rephrase them.
9 Now, you've provided one statement for this Inquiry
10 and we can find it at {APX00008766}, and it's dated
11 30 October 2019.
12 Is that your statement?
13 A. That is my statement.
14 Q. Have you read it recently?
15 A. I have.
16 Q. Can you confirm the contents are true?
17 A. They are true.
18 Q. Thank you.
19 Now, if I can turn, first of all, to your employment
20 background.
21 Is it right that you began work in the lifts
22 industry in 1980 at Stannah Lifts?
23 A. Correct.
24 Q. And that you qualified as a lift engineer in 1983?
25 A. Correct.

2

1 Q. That you worked for two different lift companies in the
2 1980s, before moving to Apex in 1996 as a repairs
3 manager?
4 A. That is correct.
5 Q. And that you were later promoted to the position of
6 construction manager?
7 A. Correct.
8 Q. And that that was a role you held during the course of
9 the Grenfell Tower project?
10 A. That is right.
11 Q. Since 2006 onwards, you have worked as a construction
12 director; is that right?
13 A. That is correct.
14 Q. Thank you.
15 Now, could I turn to your qualifications now, just
16 by way of background.
17 First of all, you have completed the J5 and J26
18 modules, which are lift engineer qualifications; is that
19 right?
20 A. That is correct.
21 Q. And that you have completed distance learning courses
22 held by the National Association of Lift Makers, and
23 it's levels 1, 2, 3 and 4; is that right?
24 A. That is correct.
25 Q. If we can turn to training matters.

3

1 In your role as construction director, would you be
2 expected to have knowledge of the relevant British and
3 European Standards as they apply to lifts?
4 A. We would.
5 Q. Over the course of your career, did you receive any
6 training on the requirements of British Standards or
7 European Standards insofar as they relate to lifts?
8 A. Yeah, we've attended seminars.
9 Q. Would you have attended seminars before you started work
10 on the Grenfell project?
11 A. Probably, yes.
12 Q. Now, looking back, if you can do, to the period
13 2003/2004, did you receive training on the principles
14 and requirements of BS 5588–5:1991, which concerned fire
15 precautions in the design, construction and use of
16 buildings, part 5, code of practice for firefighting
17 stairs and lifts?
18 A. Not that I can recall.
19 Q. Nonetheless, were you familiar with the detailed
20 requirements of that standard?
21 A. Some.
22 Q. Which requirements were you most familiar with?
23 A. 5655.
24 Q. For the uninitiated, what did that consider?
25 A. That was the lift regulations at the time.

4

1 Q. Thank you.
 2 Did you receive any training — and this is looking
 3 at 2003 and 2004 again — on the principles and
 4 requirements of BS EN 81—72:2003?
 5 A. We'd have had some seminar training, yes.
 6 Q. Would you have been familiar with the relevant
 7 requirements of that standard?
 8 A. I would have been.
 9 Q. Did you have ready access at the time to the standards
 10 themselves, hard copies, so you could consult them if
 11 necessary?
 12 A. Yes, they would have been available in the office .
 13 Q. Did you receive any training on the changes brought in
 14 by the revision to BS 5588—5:1991 which were published
 15 in 2004?
 16 A. Probably, but I can't remember.
 17 Q. Nonetheless, were you familiar with the changes that
 18 were —
 19 A. Yes.
 20 Q. — brought into practice?
 21 Again, would you have had ready access to a hard
 22 copy of that standard?
 23 A. Yes, they would have been available.
 24 Q. Finally, did you receive any training on the statutory
 25 guidance document that's known as Approved Document B?

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1 A. Not that I can recall .
 2 Q. Are you familiar at all with Approved Document B?
 3 A. No.
 4 Q. Now, in relation to firefighting lifts themselves, did
 5 you receive any other training on the design
 6 requirements of a firefighting lift ?
 7 A. No.
 8 Q. Did you receive any training, for example, on the types
 9 of buildings in which a firefighting lift would be
 10 required by standards?
 11 A. We would have received training, yes.
 12 Q. Again, would that have been provided by Apex,
 13 for example?
 14 A. Probably by a body, from LIA.
 15 Q. LIA. If you could just inform the panel — I know what
 16 LIA stands for, but if you could tell the panel.
 17 A. It's the Lift Industry Associations, it's our body.
 18 Q. If I could ask you one final question: did you receive
 19 any other training on the purposes and functions of
 20 a firefighting lift ?
 21 A. Not that I can recall , no.
 22 Q. Looking at the particular perspective of high—rise
 23 buildings, in your statement — we don't need to go to
 24 it , but it can be found at answer e to question 11,
 25 which can be found at {APX00008766/12} — you said this:

6

1 " ... I have never worked on a project, in a
 2 high rise residential building, where I was asked to
 3 replace existing lifts and install firefighting lifts .
 4 I have however carried out work/overseen work where
 5 firefighting lifts were installed in new builds."
 6 Now, have you ever worked on a project involving
 7 a high—rise building where lifts were installed with
 8 some features of a firefighting lift but not all ?
 9 A. No, we would either do all or none. So new—build have
 10 firefighting lifts as standard when they're required.
 11 Existing lifts , and still are, not carried out to this
 12 standard.
 13 Q. Can you help the panel, why is the approach all or
 14 nothing?
 15 A. The testers wouldn't be able to sign the job off as
 16 complete as firefighting . It wouldn't comply.
 17 Q. So the preference would be —
 18 A. To comply fully.
 19 Q. — to have all the aspects of a firefighting lift ?
 20 A. Correct.
 21 Q. Mr Poynter, there is an understandable temptation to
 22 give the answer as soon as possible. If you just wait
 23 for the question to finish .
 24 A. Okay.
 25 Q. It's just so that the shorthand writer can capture

7

1 everything.
 2 If I can turn to a different issue, which is the
 3 relationship between RBKC, TMO and Butler & Young.
 4 Now, before the Grenfell project , had you carried
 5 out any previous projects yourself for RBKC?
 6 A. We have worked for RBKC, but I'm not sure if the
 7 Town Hall project was before or after Grenfell , so
 8 I can't remember that far back, but yes.
 9 Q. Did any involve high—rise residential buildings?
 10 A. No.
 11 Q. Had you worked with the TMO before the Grenfell project?
 12 A. Only on the Town Hall project.
 13 Q. In your experience, did the relevant staff at the TMO
 14 have the requisite knowledge of the standards and what
 15 they required?
 16 A. From my recollection, they would, but we would have
 17 dealt more with Butler & Young than RBKC.
 18 Q. Did you have any direct dealings with anyone from the
 19 TMO, for example David Steppel or Robin Cahalarn?
 20 A. No.
 21 Q. Now, if we could just go to a name, and this is just to
 22 clarify matters, in your statement. If we go to
 23 {APX00008766/6}, and the answer to question 6.
 24 You see there in the answer, two names down, you
 25 refer to somebody called Robin Callaghan.

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1 A. Calaharn.
 2 Q. Is it Calaharn it's meant to be?
 3 A. Yeah, sorry.
 4 Q. Thank you.
 5 Had you worked with Butler & Young before you
 6 started work with them on this Grenfell project?
 7 A. Yes, we had.
 8 Q. How many occasions, can you remember now?
 9 A. There was many.
 10 Q. Did any of those projects concern high-rise residential
 11 buildings?
 12 A. Not high-rise residential.
 13 Q. Did any involve provision of firefighting lifts that you
 14 can remember?
 15 A. None.
 16 Q. Is that none did or --
 17 A. None of them had firefighters' requirements.
 18 Q. If I can just turn to the relevant standards themselves,
 19 and I'll approach it in a slightly broad way to start
 20 off with and see how far we go.
 21 Now, at the time of this project, in your view, did
 22 the relevant standards or any other legislation or
 23 guidance require the installation of firefighting lifts
 24 in new buildings?
 25 A. They would have done in new building, but not in

9

1 existing.
 2 Q. In your view, or to the best of your recollection, why
 3 weren't they required in existing buildings?
 4 A. Because the buildings themselves didn't lend themselves
 5 to be fully compliant with the regulations.
 6 Q. So, put slightly differently, the general view was --
 7 and shout if this is an unfair or inaccurate summary --
 8 that it was not reasonably practicable to install full
 9 firefighting lifts in existing buildings and, because of
 10 that, they weren't?
 11 A. That is correct.
 12 Q. Now, I would be grateful for your view in response to
 13 a conclusion reached by the Inquiry's expert,
 14 Mr Roger Howkins, if we go to {RHO00000003/118},
 15 paragraph 248.
 16 You see there in the first sentence of
 17 paragraph 248, Mr Howkins said this:
 18 "... regardless of whether the lifts were considered
 19 'new' or 'modernized', good practice would have been to
 20 consider if the lifts could be fully upgraded to the
 21 firefighting standard, so far as was reasonably
 22 practicable."
 23 Would you agree or disagree with that opinion?
 24 A. Yeah, I'd agree with that.
 25 Q. Thank you.

10

1 Now, could I discuss with you the practical
 2 consequences of the distinction between lift
 3 modernisations and lift replacements in the context of
 4 Grenfell.
 5 If we could go back to your witness statement, which
 6 is at {APX00008766/8}, if we go to the answer to
 7 question 9, you say there in the second paragraph this:
 8 "I am not clear as to what is meant by the reference
 9 to new lifts. No new lifts were installed in this
 10 project. This project related to the modernisation of
 11 existing lifts, which were fireman's lifts as specified
 12 in accordance with BS 5655."
 13 Now, if we could start, first of all, by looking at
 14 BS 5655-1 from 1989, which concerned lifts and service
 15 lifts, recommendations for the installation of new, and
 16 modernisation of, electric lifts in existing buildings,
 17 and that can be found at {BSI00001728/5}.
 18 If we can look at section 2.4.1 on the right-hand
 19 side, that says, the bottom paragraph:
 20 "It is assumed that the existing guide rails and
 21 their fixings will be retained and, if necessary,
 22 extended; any unsuitable for the new application should
 23 be replaced and considered as a new installation in
 24 accordance with section three."
 25 Now, would you agree that if the guide rails and

11

1 fixings were retained, the project should be
 2 characterised as a modernisation?
 3 A. It's correct.
 4 Q. Now, if we can stay in this document but go over the
 5 page this time to page 7 {BSI00001728/7}, section 3.1.
 6 What that says there is:
 7 "When a new lift is installed in a new lift well in
 8 association with an existing building, the installation
 9 should comply with BS 5655: Part 1. It should
 10 preferably comply with the standard dimensions specified
 11 in BS 5655: Part 5, i.e. the installation should be
 12 considered as being a new lift in a new building."
 13 Now, reading that section with section 2.4.1, would
 14 you agree that if the guide rails are not retained and
 15 the lift is installed in a new lift well, then the
 16 installation is new?
 17 A. It could be new, but it might not be able to be
 18 confirmed with the standards. There could be
 19 restrictions on the pit depth and headrooms which
 20 wouldn't necessarily comply with a new lift, so they
 21 would have to be addressed.
 22 SIR MARTIN MOORE-BICK: So these would be physical
 23 constraints of the existing structure?
 24 A. The existing building, yes. It would have to comply
 25 fully with the regulation to be classed as a new lift

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1 and would not be passed off.
 2 MR KINNIER: So your view would be that that caveat is all
 3 important in the approach that you take to whether
 4 something is modernised or new?
 5 A. Correct.
 6 Q. Could we look at BS 5655—11:2005, which is lifts and
 7 service lifts, code of practice for the undertaking of
 8 modifications to electric lifts, and that can be found
 9 at {BSI00001724/7}.

10 This part of the standard, you will see it's got
 11 section 1, "Scope", and if you look at the second
 12 paragraph, it says:
 13 "This part of BS 5655 does not cover any of the
 14 following types of lift:
 15 "a) new lifts (see Note 2)."
 16 If we look slightly further down the page at note 2,
 17 it says this:
 18 "Where a lift falls into one of the following
 19 categories, it is deemed to be a new lift as defined in
 20 the Lifts Regulations 1997 and this part of BS 5655 is
 21 not applicable."
 22 It says lift "completely replaced" at the third
 23 dash, and "only retains the guide rails" immediately
 24 below that.
 25 Now, that suggests, looking at that standard in the

13

1 round, that if only the guide rails are retained, the
 2 lift should be categorised as a new lift.
 3 Looking at what's said there, would you agree with
 4 that proposition?
 5 A. That is correct, yes.
 6 Q. Now, mindful of what that standard says there, can we
 7 look at what was actually done at Grenfell and then
 8 I can explore with you your views as to whether it was
 9 a new lift or not.
 10 Am I right in understanding that the project
 11 required an increase in the lift car size and capacity,
 12 so from 8 to 12 people?
 13 A. That is right.
 14 Q. And the project involved the following, and if I can
 15 just roll them off and see whether you agree with them
 16 or not: the replacement of the complete lift car?
 17 A. Correct.
 18 Q. The counterweight?
 19 A. Correct.
 20 Q. The car sling and platform?
 21 A. Correct.
 22 Q. Safety gear?
 23 A. Correct.
 24 Q. Door operator?
 25 A. Correct.

14

1 Q. Car doors?
 2 A. Correct.
 3 Q. Landing doors?
 4 A. Correct.
 5 Q. Landing control system?
 6 A. Correct.
 7 Q. Lift pit buffers?
 8 A. Correct.
 9 Q. Electrical wiring?
 10 A. Correct.
 11 Q. Lift controller?
 12 A. Correct.
 13 Q. And the lift motor gearbox?
 14 A. Correct.
 15 Q. Now, mindful those are all the matters that were
 16 replaced, can we look to see what was retained, and for
 17 that purpose go to the specification, in particular
 18 {BUT00000044/12}, and section 1.3.1, which should be at
 19 the top of that page.
 20 You will see there, under the heading "Retained
 21 equipment", in relation to the two electric passenger
 22 lifts, it says:
 23 "Guides and single riser of car guide brackets.
 24 "Landing back boxes."
 25 Is that a fair summary?

15

1 A. That is correct, yeah.
 2 Q. Could you help us, landing back boxes, what are they?
 3 A. It's the back box fitted within the structure of the
 4 building that the landing push stations adhere to. So
 5 they're actually fixed into that part of the building
 6 structure.
 7 Q. Now, although guides are set out there as having been
 8 retained, is it right to say that they were in fact
 9 relocated?
 10 A. They were moved.
 11 Q. Where were they moved to?
 12 A. To make the car bigger.
 13 Q. Now, given that they were relocated, would you still
 14 take the view that nonetheless they were retained?
 15 A. They were retained.
 16 Q. So the fact they were moved around, in your view, is
 17 irrelevant when looking to see if they were new or
 18 modernised lifts?
 19 A. Irrelevant.
 20 Q. Can you help us as to why?
 21 A. It goes back to the standards. If it's a new lift, it
 22 will be a completely new lift installation and it would
 23 have to comply with the current regulations at the time.
 24 Existing lifts more often than not do not. The pit
 25 depths and headroom are the constraints of the new lifts

16

1 and the sizes given.
 2 Q. Just looking back at this, so looking at retained
 3 equipment, the guides were relocated but, in your view,
 4 retained.
 5 A. Yeah.
 6 Q. Were the landing back boxes in fact retained?
 7 A. They were retained.
 8 MR KINNIER: Thank you.
 9 SIR MARTIN MOORE–BICK: These landing back boxes, are they
 10 just essentially the bit behind the control panel or the
 11 button panel?
 12 A. Yeah, because the building I think was concrete, from
 13 memory, so they would have been cut into the concrete
 14 and then set in that concrete, so --
 15 SIR MARTIN MOORE–BICK: So it's a big chasing in the
 16 concrete?
 17 A. They would have been chased in when the building was
 18 formed.
 19 SIR MARTIN MOORE–BICK: Thank you.
 20 MR KINNIER: Looking at the extent of the apparatus that was
 21 replaced and the limited amount that was retained, was
 22 the project an opportunity for the TMO and RBKC to
 23 enhance the safety features of these lifts ?
 24 A. It could have been, if it was discussed at the time.
 25 Q. Would it have been, in your view, good industry practice

17

1 to have considered what aspects of a firefighting lift
 2 could be included in these new lifts ?
 3 A. No, because you have to either commit fully or not at
 4 all. So the idea was not to do it, and still practised
 5 today with the boroughs in London.
 6 Q. So you wouldn't examine, for example, whether it would
 7 have been practicable to have installed the trap door?
 8 A. No, because putting the trap door would create more
 9 risks.
 10 SIR MARTIN MOORE–BICK: Well, that might be true in relation
 11 to the trap door, but let's take something that wouldn't
 12 create a risk, for example a secondary and separate
 13 power supply.
 14 A. It wouldn't still be classed as a firefighting lift,
 15 because the tester would have to sign the lift off and
 16 it wouldn't comply as a fully firefighting lift.
 17 SIR MARTIN MOORE–BICK: So he couldn't sign it off as
 18 a firefighting lift.
 19 A. No.
 20 SIR MARTIN MOORE–BICK: He'd have to sign it off as
 21 a fireman's lift.
 22 A. Correct.
 23 SIR MARTIN MOORE–BICK: But would it not be worth -- I think
 24 this is the thrust of the question -- considering
 25 whether it would be a fireman's lift with some enhanced

18

1 features?
 2 A. It could well have been. Anything could have been
 3 looked at at the time, in hindsight --
 4 SIR MARTIN MOORE–BICK: Yes.
 5 A. -- and these features added.
 6 SIR MARTIN MOORE–BICK: Yes.
 7 MR KINNIER: Can you remember at the time, during
 8 discussions, whether you or anyone else raised the
 9 prospect, either with Butler & Young or with
 10 David Steppel or Robin Cahalarn, it's worth considering
 11 some additional features, the trap door or the secondary
 12 power supply or water protection or anything like that?
 13 A. No, because we worked to the specification.
 14 Q. Now, could we look at your role as the construction
 15 director at Grenfell.
 16 If we can go back to your witness statement, which
 17 is at {APX00008766/3}. At the very bottom of the page,
 18 you say this:
 19 "I was involved in the modernisation project from
 20 an early stage."
 21 Now, holding that point in your mind, can I ask you
 22 to go to {APX00005619}.
 23 You will see at the very top of this page it's
 24 described as "Contract documentation for the
 25 refurbishment of two electric passenger lifts ... and

19

1 replacement of one hydraulic passenger lift ... at
 2 Grenfell Tower".
 3 Do you remember ever seeing this document before?
 4 A. Not the contract documents, only the specification.
 5 Q. So if we, say, for example, go into that document,
 6 slightly further in, if we can, to get to the substance.
 7 Stopping there {APX00005619/3}, looking at the
 8 index -- and we can go to the substance if you want
 9 to -- the word "specification" crops up a lot. What
 10 appears to be the case is that although this is called
 11 the contractual documentation, it's in fact the
 12 specification. Is this something --
 13 A. Yeah.
 14 Q. Is this the document you would have been provided with,
 15 do you think?
 16 A. Correct, yes.
 17 Q. Would there ever have been a need for you to have seen
 18 the contract, for example, between RBKC and TMO on the
 19 one hand and, say, Butler & Young or Apex on the other?
 20 A. Not necessarily at that time.
 21 Q. Now, looking at the different areas of responsibilities,
 22 what was your understanding of Butler & Young's role in
 23 the project?
 24 A. They would oversee the whole of the project from the
 25 specification to completion, to ensure that we carried

20

1 out the work in accordance with their specification .
 2 Q. What was Apex's role?
 3 A. To fully comply with the works that were specified.
 4 Q. If we could go to {APX00005551}.
 5 This is a fax dated 6 August 2004 from Ian Moorhouse
 6 of Butler & Young to Paul Thomas.
 7 Can you help us, who was Paul Thomas? What was his
 8 role at Apex?
 9 A. Yeah, this is jogging the memory. Paul Thomas would
 10 have been our sales engineer at the time.
 11 Q. If we look down at the substance of the fax, it confirms
 12 that RBKC/TMO are pleased to proceed with Apex, and if
 13 we go to the penultimate paragraph at the bottom, it
 14 says:
 15 "Start on site is a critical date – RBKC are anxious
 16 to achieve a major spend this year and perhaps Gary can
 17 investigate on this."
 18 Can you help us as to what that comment meant?
 19 A. That would be on me procuring the materials and placing
 20 the orders on our suppliers for the control system, the
 21 long lead items, machine, because they come from Italy
 22 and there would have been a 16 to 18-week lead-in period
 23 for this. So he would have been keen for me to get all
 24 the materials on order obviously to fall within the
 25 borough's spending requirements.

21

1 Q. Now, if we can turn to the specification itself, and if
 2 we go back to your witness statement, {APX00008766/4}.
 3 At the top of the page is a continuation of
 4 paragraph 16, and the first line at the very top of this
 5 page, you say the specification was very detailed.
 6 If the specification contained anything that was
 7 unworkable, in the sense of it couldn't be done or was
 8 undesirable, would those concerns be something that you
 9 would raise first of all with Butler & Young?
 10 A. Not normally, because they would have been discussed
 11 during the tender stage if there was any questions with
 12 that specification. They was pretty thorough in what
 13 they asked for, Butler & Young.
 14 Q. And you didn't have any cause to raise any concern with
 15 Butler & Young?
 16 A. No, I wouldn't have cause to raise a question of their
 17 specification.
 18 Q. If I could go back to the specification. If we could go
 19 to {BUT00000044/20}, and look at paragraph 2A.01.
 20 We see five paragraphs down, it's the one that
 21 starts with the words "Should anything", and that says
 22 this:
 23 "Should anything be omitted from this specification,
 24 which is fitting and usually considered necessary for
 25 due and proper completion of the work, the Tenderer

22

1 shall verbally bring this to the attention of the
 2 [supervising officer] prior to tender submission with
 3 confirmation in a letter prior to submitting the Tender
 4 return."
 5 So, looking at that, at the tender stage, if
 6 anything was missing from the specification, then Apex
 7 would have brought it to Butler & Young's attention,
 8 presumably?
 9 A. They would have done.
 10 Q. At what level would that have been done? Would you have
 11 raised it or did someone higher up --
 12 A. No, that would probably have been with the sales team.
 13 Q. Now, I don't know whether you have watched the evidence
 14 last week from Mr Ellis and Mr Moorhouse.
 15 A. I have.
 16 Q. Now, we were told that the TMO had instructed
 17 Butler & Young not to arrange for firefighting lifts to
 18 be installed.
 19 First of all, do you remember any such or hearing of
 20 any such instruction from the TMO to Butler & Young?
 21 A. No.
 22 Q. Is that something that you would have been informed of
 23 in the usual course?
 24 A. I would imagine so, but the specification would have
 25 actually been -- would have said firefighting lifts,

23

1 which is normal.
 2 Q. Put differently, do you remember any concerns or
 3 complaints being raised by TMO or RBKC that
 4 a firefighting lift had not been installed?
 5 A. No, none.
 6 Q. Can we take it from your previous answers that neither
 7 you nor anyone at Apex had any concerns about not
 8 fitting a firefighting lift at Grenfell?
 9 A. No concerns.
 10 Q. Did you or anyone else at Apex, to the best of your
 11 knowledge, question whether leaving lifts as fireman's
 12 lifts was compliant with relevant standards?
 13 A. It was at the time.
 14 Q. And that's for the reasons you've given earlier on?
 15 A. Yeah.
 16 Q. Now, if we could go back to the specification, and if we
 17 go to page 22 {BUT00000044/22}, we see there at
 18 paragraph 2A.05, under the heading "Regulations", it
 19 says this:
 20 "Although it is recognised that the existing
 21 structural constraints shall prevent full compliance
 22 with harmonised European Standards, the requirement is
 23 for the lift installation to include all of those items
 24 and features that do comply, as far as is reasonably
 25 practicable."

24

1 Now, that on its face puts you on notice or rather
 2 refers to existing structural constraints. Were there
 3 any existing structural constraints that were relevant
 4 here?
 5 A. There would have been, the pit depth and the headroom.
 6 Q. I didn't catch the first bit. I caught "headroom"; what
 7 was the first bit?
 8 A. Pit depth.
 9 Q. Pit depth.
 10 Do you know whether the advice of a structural
 11 engineer was sought in relation to either or both of
 12 those topics?
 13 A. No.
 14 Q. You don't know or --
 15 A. I don't know.
 16 Q. Do you remember hearing any reference to any advice
 17 given by a structural engineer?
 18 A. None.
 19 Q. Could we stay within the specification but go to page 23
 20 {BUT00000044/23} and paragraph 2A.06, which concerns
 21 design standards.
 22 We will see there it says this:
 23 "The equipment and installation shall conform to
 24 this specification and to the relevant British Standards
 25 including Codes of Practice and, in particular, BS 5655,

25

1 BS 7255 and EN81-1. Where this specification differs
 2 from those standards and codes, the provision of this
 3 specification shall prevail.
 4 "Reference to British Standards and Codes of
 5 Practice shall mean the edition current three months
 6 prior to the date for return of tenders. A certificate
 7 of compliance with the relevant British Standards shall
 8 be provided to the [supervising officer] on request.
 9 Any changes during the course of the contract in the
 10 relevant British Standards and Codes of Practice shall
 11 be brought to the attention of the [supervising officer]
 12 by the Contractor.
 13 "It shall be understood that the existing
 14 characteristics, particularly dimensions and clearances,
 15 may not comply with current British Standards and these
 16 shall be qualified in the tender return."
 17 Now, first of all, "SO" is supervising officer; is
 18 that right?
 19 A. That is correct. That would be Butler & Young.
 20 Q. Was a certificate of compliance with relevant
 21 British Standards ever provided by Apex to the
 22 supervising officer?
 23 A. Not that I'm aware of.
 24 Q. Did they ever ask you for one, to the best of your
 25 knowledge?

26

1 A. I don't think they did, no.
 2 Q. Was a certificate of compliance usually not given? Is
 3 it unusual not to give it?
 4 A. Well, you give the certification of compliance on a new
 5 lift, on a CE-marked lift, not on a refurbished lift.
 6 MR KINNIER: Now, could I ask you to turn --
 7 SIR MARTIN MOORE-BICK: I'm sorry, Mr Poynter, I think
 8 I will have to ask you to keep your voice up a bit.
 9 A. Sorry.
 10 SIR MARTIN MOORE-BICK: Because the transcriber finds it
 11 quite hard sometimes to catch what the witness says.
 12 A. Sorry.
 13 SIR MARTIN MOORE-BICK: Thank you.
 14 MR KINNIER: If we could stay in the specification but turn
 15 over the page to page 24 {BUT00000044/24},
 16 paragraph 2A.07.
 17 We see there, under the heading "Related
 18 Documentation and References", the first paragraph says
 19 this:
 20 "This tender documentation shall be read in
 21 conjunction with, and its requirements are in addition
 22 to, the general conditions of contract and any drawings
 23 and other documents issued with it and listed in this
 24 invitation to tender and as set out below."
 25 If we go to the very bottom of this page, I think,

27

1 from memory, fourth from the bottom, we have BS 5588,
 2 which is fire precautions in the design, construction
 3 and use of building.
 4 Now, BS 5588 appears on the list of standards to be
 5 read here in conjunction with the specification.
 6 Now, at first blush, its inclusion suggests that
 7 compliance with firefighting lift standards should have
 8 been considered.
 9 First of all, is that a fair reading of --
 10 A. That is a fair reading, but it's not actually described
 11 within the specification, so it's not required.
 12 Q. Do you remember whether you or anyone else at Apex, to
 13 the best of your knowledge, when they were looking at
 14 this, when their tender was being prepared, raised
 15 whether firefighting lifts ought to have been --
 16 A. No, they wouldn't have raised it because the
 17 specification didn't call for it.
 18 Q. So it follows from that that, in your view at least, it
 19 was obvious that the specification did not require
 20 a firefighting lift?
 21 A. That is correct.
 22 Q. Now, could I turn to a separate topic, which is timing
 23 or opportunity for raising any concerns that Apex may
 24 have had.
 25 If we can go to Warren Jenchner's statement, which

28

1 can be found at {APX00008774/5}.

2 It's four paragraphs down from the top. It starts

3 with the words "The preparation of the contract", and he

4 says this:

5 "The preparation of the contract and therefore the

6 specification of the work was the responsibility of

7 [Butler & Young], on the instruction of their client .

8 Once completed and disseminated to Apex, there would be

9 no scope for Apex to enter into any discussions

10 regarding changes to the proposed work, design issues

11 and suggestion for alternative plans."

12 If we could just hold that in our heads and go to

13 {APX00008783/2}.

14 You see, under the heading "Answer", the first one

15 of those, and if we go down to the third paragraph under

16 that emboldened word "Answer", he said:

17 "Once awarded the contract, site meetings would be

18 held prior to the project starting and any issues could

19 have been raised with BYLC at this time."

20 Would you agree with Mr Jenchner's observation that

21 Apex could have raised issues with Butler & Young before

22 the project starting?

23 A. No, they would have only concerned with the project and

24 the specification . The meeting there they're referring

25 to would have been anything on site, issues. Storage,

29

1 container issues, that's what that is referring to.

2 Q. So the practicalities of operation of a site?

3 A. Correct, that's what that one means.

4 Q. If there were any safety concerns -- again, sorry, this

5 may be slightly repetitious, but if Apex had any safety

6 concerns about the specification, when would those be

7 raised?

8 A. They wouldn't be raised. We would follow the

9 specification and they would be replicated in our

10 drawings and the issuing of the equipment.

11 Q. So --

12 A. We wouldn't question the specification.

13 Q. So even if there were safety concerns?

14 A. We wouldn't read that there was safety concerns in

15 there.

16 Q. So at what level -- presumably Apex -- this may be

17 a question for Mr Jenchner, thinking about it, but if

18 there were safety concerns, presumably Apex wouldn't

19 stay silent, it would raise them at some point?

20 A. If there were serious concerns, they would be raised,

21 but there was no -- the only concerns are what we're

22 talking about now, if they were firefighting or not, and

23 it wasn't relevant at the time. We was only working to

24 their specification .

25 Q. And just for the avoidance of doubt, there were no

30

1 safety concerns raised, to the best of your knowledge?

2 A. There were no safety concerns.

3 Q. Can I now turn on to a separate question, which is the

4 fire control switch and the construction of the lifts .

5 If we could go to {TMO00853769}.

6 Now, this was an email sent by Robin Cahalarn at the

7 TMO to Ian Moorhouse at Butler & Young -- you can't see

8 that, it's redacted -- it was not sent to you. I'll

9 just let you read it.

10 (Pause)

11 Now, it refers to the type of landing door release

12 key. Would that key have been the same as the fire

13 control switch key?

14 A. It would have been exactly the same. It would be

15 an express drop key.

16 Q. Now, it suggests that the original Apex tender return

17 made provision for a Euro release key rather than

18 a drop key. Do you remember what Apex had tendered for

19 originally?

20 A. Not originally .

21 Q. Would they usually propose a Euro key?

22 A. We would do either. We would use a Euro or a drop key,

23 depending on the specification, we can change to either.

24 Q. Do you recall being asked to change the type of fire

25 control switch key from a Euro to a drop --

31

1 A. We probably would have done that ourselves because of

2 the type of building, to suggest a drop key and not

3 a Euro key in that situation, as it's not practice .

4 Q. You say the type of building; can you help the panel

5 here, what are you referring to there?

6 A. It's because it is a borough -- a council--type building.

7 Q. Are you referring there to security concerns?

8 A. Yeah, I would be, security concerns with a Euro key

9 because everybody has access to them.

10 Q. When you say everyone has access to a Euro key, you say

11 they're readily available on the internet --

12 A. They are.

13 Q. -- and other sources?

14 A. Yeah, the express key was designed as a vandal--resistant

15 key.

16 Q. If we can go back to the specification, which is at

17 {BUT000044/60}, it's the specification, or section

18 thereof, which deals with fireman's control.

19 Now, the switch was to be installed on the ground

20 floor of the tower; is that right?

21 A. That is correct .

22 Q. And the fireman's control switch set out in the

23 specification is designed to be operated by an express

24 drop release key; is that right?

25 A. That is correct .

32

1 Q. And the relevant standards at the time required that
 2 firefighting lifts should have a fire control switch; is
 3 that right?
 4 A. That's correct.
 5 Q. And the difference between a fireman's control switch in
 6 the specification and a fire control switch described in
 7 the relevant standards is the type of key used to
 8 operate the switch?
 9 A. That is correct, there is a difference.
 10 Q. Just for the avoidance of doubt, a fire control switch
 11 is operated with a Euro key, which is a triangular
 12 design; is that right?
 13 A. That is correct.
 14 Q. And the dimensions of the Euro key are specified in the
 15 relevant standard?
 16 A. That is correct.
 17 Q. So the Euro key is manufactured to very specific
 18 dimensions; is that right?
 19 A. That's correct.
 20 Q. Were the TMO well aware that Euro keys were widely
 21 available on the internet and elsewhere?
 22 A. I would imagine they would have been at the time, yes.
 23 Q. Was that common knowledge?
 24 A. It was definitely common knowledge.
 25 Q. Could we go back to your witness statement at

33

1 {APX00008766/16}.
 2 It's your answer to question 21, and there you say
 3 you think that the fire control switches were procured
 4 from AA Electrical.
 5 "There is no other documentation that I have seen
 6 that identifies the switches in terms of make and
 7 model."
 8 Is there any further detail that you can provide on
 9 fuller reflection here?
 10 A. No, it's just that we would have procured that type of
 11 switch from AA Electrical.
 12 Q. And AA Electrical, are they manufacturers?
 13 A. They were a supplier. I think — I believe they
 14 manufactured as well.
 15 Q. Do you know whether they manufactured the switches
 16 generally?
 17 A. Yes, they do.
 18 Q. Is it likely that they were the manufacturer of the
 19 switch we're concerned with here?
 20 A. That is.
 21 Q. Now, if we can go to page 9 in your statement
 22 {APX00008766/9}, and it's c, which is at the bottom of
 23 the page, you say this:
 24 "From the drawings, only one switch was fitted to
 25 operate both lifts as they were duplexed as identified

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1 at Section 2A.14(2) of the specification. As they
 2 operated in this way, one fireman's switch allowed for
 3 control of both lifts."
 4 Can you explain for us how one switch operated both
 5 lifts?
 6 A. Because the lifts were duplexed together by the control
 7 system, they would be interlinked, so any switch that's
 8 signalled would bring both. It would actually stop the
 9 lifts where they were going, doors would remain closed,
 10 and it would bring the lifts back down to the ground
 11 floor, where the doors open, and that would give control
 12 to the fireman, whoever's activated that switch.
 13 Q. Was it common to install one fire control switch for two
 14 lifts?
 15 A. For a duplex, yes.
 16 Q. Were there any advantages or indeed disadvantages to
 17 using this method of control?
 18 A. No, none.
 19 Q. Could I turn on to the separate topic now of the
 20 commissioning of the lifts, and if we go first of all to
 21 {APX00008692/28}.
 22 If we can look at the right-hand side of that
 23 document, we'll see, roughly a third of the way down,
 24 parallel to the first punch hole, the box "Purchasers
 25 identification [number]", and underneath that it says

35

1 "H090". Does that mean this is the testing certificate
 2 for lift H090?
 3 A. That is correct.
 4 Q. Thank you.
 5 If we could go to page 32 {APX00008692/32}, so four
 6 pages on, we can see just below or just parallel to the
 7 first punch point is clause 2.9, which concerns landing
 8 door assemblies, and if we could amplify that, you will
 9 see the first question asks:
 10 "Does this contract require the landing door
 11 assembly to be fire-rated."
 12 And there is no answer at all there.
 13 Can you help us as to why that particular box has
 14 not been ticked?
 15 A. I can only guess that the tester at the time didn't have
 16 sight of the certificate for the door.
 17 Q. It says at (e):
 18 "Confirm that the fire rate elements of the door
 19 assembly are correctly fitted."
 20 Now, would any detail of fire rating be provided
 21 afterwards if it were missing here?
 22 A. It would have been, but he's ticked it, so he would have
 23 known the doors had the requirements of the fire
 24 assembly on the door, they would have had the smoke
 25 fillets in place, so he would know that they are fire

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1 doors.
 2 Q. We don't need to go to it, but the commissioning
 3 certificate for the other lift, so H091, does have the
 4 box ticked and the information provided. Would that
 5 simply mean that the documentation was ready at the time
 6 of testing?
 7 A. Correct.
 8 Q. Just to complete the point, if we can go back to your
 9 witness statement at {APX00008766/7}.
 10 It's really your answer to question 7b. You say
 11 that you cannot locate any certification relating to the
 12 fire rating of the lift landing doors. Propbrook were
 13 unable to supply the certificates when requested.
 14 Would you have expected the certification to have
 15 existed originally?
 16 A. Yes, they would have been -- there would have been
 17 a certification for them doors.
 18 Q. Now, if we can go to {APX00008692/42}. It's section 14,
 19 which starts just below the first punch hole.
 20 The form indicates there that the lift was not
 21 a firefighting lift. Is that a correct reading of the
 22 document?
 23 A. That is correct.
 24 Q. If we look further down, we see at (g) the question
 25 requests confirmation that the emergency operation

37

1 systems function correctly, and confirmation is given
 2 there, "Yes". Is that a fair reading of that?
 3 A. That is correct, yes.
 4 Q. The form also says that the emergency operation system
 5 has not been demonstrated. We can see that in the box
 6 just off centre at the bottom of the page.
 7 Do you know why the emergency operation system had
 8 not been demonstrated at this time?
 9 A. No, I can't answer that, sorry.
 10 Q. Would that demonstration have included testing of the
 11 fire control switch?
 12 A. That would have been demonstrated -- the tester's tested
 13 it, I imagine, but not demonstrated it.
 14 Q. If we just go to page 44 {APX00008692/44}, we see your
 15 name in the bottom right-hand corner. Would you have
 16 been responsible for all elements of testing?
 17 A. I would have signed that off on completion, yes.
 18 Q. And you would have satisfied yourself as to the accuracy
 19 of all the answers?
 20 A. Yes.
 21 MR KINNIER: Can I now turn on to a separate topic, which is
 22 the automatic fire recall system.
 23 SIR MARTIN MOORE-BICK: Sorry, before we leave this, you
 24 hadn't actually signed this document.
 25 A. No, I would have signed the original. I think when

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1 they're typed out, they don't actually get to me, they
 2 get issued.
 3 SIR MARTIN MOORE-BICK: Oh, this document is created after
 4 all the work's been done?
 5 A. Yeah, it would have been done manually on site by the
 6 tester and handwritten, and then we would type it to
 7 issue it, so it looks better.
 8 SIR MARTIN MOORE-BICK: All right, thank you.
 9 MR KINNIER: Turning on to the automatic fire recall system.
 10 Just so I can double check we're talking about the
 11 same thing, the definition I'm applying is a system
 12 which, when smoke or heat is detected, automatically
 13 recalls the lifts to a particular floor. Is that, for
 14 these purposes, as good a definition as we're going to
 15 get?
 16 A. Yeah, that's correct.
 17 Q. Thank you.
 18 Now, before the lift works, do you know if there was
 19 an automatic fire recall system in place at Grenfell?
 20 A. Not that I recall, no.
 21 Q. Is it right that an automatic fire recall system was not
 22 included in the specification?
 23 A. I don't think it was, no.
 24 Q. Now, it seems to have been added at a later stage in the
 25 project; is that right?

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1 A. That is correct, yes.
 2 Q. And it seems to have been about late 2005, early 2006;
 3 is that --
 4 A. That is correct.
 5 Q. Can you remember now why the system was added?
 6 A. No, I can't recall that, sorry.
 7 Q. Can you remember what type of automatic fire recall
 8 system was ultimately installed?
 9 A. I think, from memory, it was -- it would just be
 10 a recall -- we put volt free contacts in the machine
 11 room and that would be integrated within a system fitted
 12 by others.
 13 Q. Thank you.
 14 Was it connected to the building management system
 15 at all?
 16 A. It would have been, and tested, yes.
 17 Q. Can you remember, was the system installed to allow the
 18 lift to comply with a particular standard or not?
 19 A. That I wouldn't know.
 20 Q. You don't remember that as being --
 21 A. No.
 22 Q. -- a subject of discussion at the time?
 23 A. No, not at all.
 24 Q. Did you test the fire recall system?
 25 A. Not that I know of, but it would -- I wouldn't

40

1 personally, but it would have been tested.
 2 Q. Do you know why the system was eventually disconnected?
 3 A. No, I don't.
 4 Q. Can you remember, by the time of Apex's later
 5 involvement in the lifts, so this is 2015, whether the
 6 recall system was functional or not?
 7 A. I wouldn't, no, sorry.
 8 Q. Can I now turn on to that second project, which is
 9 slightly more than a decade after the first one.
 10 Apex became involved in the second set of works in
 11 about 2015; is that about right?
 12 A. That's about right, yes.
 13 Q. Who was Apex's TMO contact during project 2?
 14 A. It would have been my project manager, Gary Ager.
 15 Q. If I can ask us to go to {APX00007916/2}, we have
 16 a letter of intent dated 12 February 2015, sent by Rydon
 17 to Apex.
 18 Can you remember now, was there a concluded written
 19 contract between Apex and Rydon?
 20 A. Probably. I couldn't tell you.
 21 Q. Would that be something that you looked for, or is it
 22 a concern for other people?
 23 A. Probably a concern for other people. I had minimum
 24 involvement in project 2.
 25 Q. Can you help us, what was Apex contracted to do during

41

1 the course of project 2?
 2 A. Supply and fit the four new entrances and upgrade the
 3 car COP to add the extra floors in.
 4 Q. If we can turn to page 13 of your statement
 5 {APX00008766/13}, in response to question 12, so it's
 6 the top third of the page, you describe yourself as
 7 having "an overarching supervisory role" on the project.
 8 What did that mean, in practice?
 9 A. I would have just undertaken -- helped Gary procure the
 10 materials, and basically looked -- he would look after
 11 the project.
 12 Q. Did you supervise Gary Ager?
 13 A. Yes.
 14 Q. Did he require sort of constant supervision or was it
 15 occasional help you provided?
 16 A. Occasional, if he needed it. Gary was very competent.
 17 Q. Was the issue of whether the lifts were or should be
 18 firefighting lifts ever raised during project 2, do you
 19 remember?
 20 A. Not that I'm aware of.
 21 Q. Can I ask you now about the walkway floor switch,
 22 finally.
 23 At the time of the fire, a second fire control
 24 switch was installed on the walkway floor, but it had
 25 been disconnected.

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1 Can you assist the panel at all as to why that
 2 switch had been installed on the walkway floor?
 3 A. No, I've no recollection of that at all, sorry.
 4 Q. Do you know whether it was installed as part of the
 5 second project?
 6 A. No, I don't.
 7 MR KINNIER: Well, Mr Poynter, I've come to the end of my
 8 prepared questions.
 9 Sir, might I have ten minutes?
 10 SIR MARTIN MOORE-BICK: Yes.
 11 Mr Poynter, when counsel gets to the end of his
 12 questions -- you may know this -- we have to have
 13 a break to give him a chance to make sure he has asked
 14 all the questions, occasionally something has been left
 15 out, and also to let other people who are not present in
 16 the room suggest questions that perhaps we ought to ask
 17 you before you leave.
 18 So we'll stop now until 11.05. Will that be long
 19 enough, do you think, Mr Kinnier?
 20 MR KINNIER: Yes.
 21 SIR MARTIN MOORE-BICK: Yes. We'll break until 11.05, and
 22 then, when you come back, we will see if there are any
 23 more questions for you.
 24 THE WITNESS: Okay.
 25 SIR MARTIN MOORE-BICK: Please don't talk to anyone about

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1 your evidence while you're out of the room, and if you
 2 go with the usher now, she'll look after you.
 3 THE WITNESS: Thank you.
 4 SIR MARTIN MOORE-BICK: Thank you very much.
 5 (Pause)
 6 Right, 11.05, then.
 7 MR KINNIER: Thank you, sir.
 8 SIR MARTIN MOORE-BICK: Thank you.
 9 (10.52 am)
 10 (A short break)
 11 (11.05 am)
 12 SIR MARTIN MOORE-BICK: Right, Mr Poynter. Well, we'll see
 13 if there are any more questions for you.
 14 Yes, Mr Kinnier.
 15 MR KINNIER: Thank you, sir.
 16 I have no further questions for you, Mr Poynter, so
 17 it just leaves me to say thank you very much for
 18 attending today.
 19 THE WITNESS: Thank you.
 20 SIR MARTIN MOORE-BICK: Yes, Mr Poynter, and it's right that
 21 I should thank you very much on behalf of the panel for
 22 your coming here to give evidence. It hasn't taken
 23 a lot out of your day, but it must have been a nuisance
 24 anyway, because you would have had something else to do,
 25 so we are very grateful to you, it's been helpful to

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1 hear what you have to tell us, and you're now free to
 2 go.
 3 THE WITNESS: Thank you.
 4 SIR MARTIN MOORE—BICK: Thank you very much for coming.
 5 THE WITNESS: Thank you.
 6 (The witness withdrew)
 7 SIR MARTIN MOORE—BICK: Yes, Mr Kinnier.
 8 Now, we have another witness, but we have to have
 9 the usual break, don't we, for housekeeping
 10 arrangements?
 11 MR KINNIER: Yes, and there is a changeover at the Bar as
 12 well, so I don't know whether this is maybe a convenient
 13 time to take an early break, and so ...
 14 SIR MARTIN MOORE—BICK: We could. If we had a slightly
 15 short early break, so to speak, and said 11.20, would
 16 that give enough time for the housekeeping and for
 17 everyone else to get organised?
 18 MR KINNIER: I'm sure.
 19 SIR MARTIN MOORE—BICK: Right. Well, we will say 11.20. If
 20 you need any more time, just let us know.
 21 MR KINNIER: Thank you, sir.
 22 (11.07 am)
 23 (A short break)
 24 (11.20 am)
 25 SIR MARTIN MOORE—BICK: Yes, Mr Ustych. Now, I gather

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1 you've got another witness for us.
 2 MR USTYCH: We do, yes. May I call Roger Anthony, please.
 3 SIR MARTIN MOORE—BICK: Thank you.
 4 MR ROGER ANTHONY (affirmed)
 5 SIR MARTIN MOORE—BICK: Thank you very much.
 6 Now, do sit down, please, make yourself comfortable
 7 there.
 8 (Pause)
 9 Yes, when you're ready, Mr Ustych.
 10 Questions from COUNSEL TO THE INQUIRY
 11 MR USTYCH: Thank you, Mr Chairman.
 12 Can you please give the Inquiry your full name?
 13 A. Roger Anthony.
 14 Q. Thank you very much for coming to give evidence today.
 15 Before I start asking questions, there are a few
 16 preliminary matters I would like to draw to your
 17 attention.
 18 If you have difficulty understanding anything I'm
 19 saying or if my questions are excessively long and
 20 convoluted, please do let me know and I'll rephrase
 21 them.
 22 If you feel that you need a break at any point,
 23 please let us know.
 24 Can I ask you to please keep your voice up, and say
 25 rather than nod or shake your head to any questions

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1 I ask, so the transcriber can pick up what you're
 2 saying.
 3 A. Yes.
 4 Q. Thank you.
 5 You made a witness statement to the Inquiry, and
 6 we're going to go to that now, which is {APX00008780}.
 7 If we turn to page 12, please, it's dated
 8 29 October 2019. Is that your signature?
 9 A. That's correct.
 10 Q. Have you read your statement recently?
 11 A. Yes, I have.
 12 Q. Can you confirm the contents are true?
 13 A. I can confirm they're true, yes.
 14 Q. Thank you.
 15 Have you discussed your evidence with anyone before
 16 coming here today?
 17 A. No.
 18 Q. Thank you.
 19 I'll begin by asking you some questions about your
 20 employment background.
 21 If we could please go back to the beginning of the
 22 statement, paragraph 3 onwards {APX00008780/1}.
 23 You began working in the lifts industry in around
 24 1982; is that right?
 25 A. Correct.

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1 Q. You started working at Otis Lifts as a fitter's mate and
 2 were eventually promoted up to a project manager?
 3 A. Correct.
 4 Q. You moved to Apex around 2005/2006, and left in around
 5 2007 or 2008; is that right?
 6 A. As far as I can recall, yes.
 7 Q. Are you currently working at Pickering Lifts as a test
 8 engineer?
 9 A. I am.
 10 Q. Can you briefly explain, please, what does a test
 11 engineer do?
 12 A. Checks the --- does the static and --- static tests on the
 13 lifts, the functional tests on the lifts and the dynamic
 14 tests on the lifts to make sure it's safe and
 15 operational for the public.
 16 Q. Touching on those terms briefly, for those of us who are
 17 not lift engineers, static, is that when the lift is
 18 just stood in its place and not moving?
 19 A. Correct.
 20 Q. And dynamic?
 21 A. Dynamic testing would be the safety gear test, the
 22 buffer test, ie moving.
 23 Q. And functional?
 24 A. Functional tests are the functions of the lift, ie as in
 25 push buttons, indicators and so on.

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1 Q. Thank you. That's very helpful.
 2 So, overall, you worked in the lifts industry since
 3 the early 1980s, so coming up to 40 years now?
 4 A. Correct.
 5 Q. How would you describe your level of knowledge of the
 6 lifts industry?
 7 A. Fairly knowledgeable.
 8 Q. Can you help us, please, how do you keep up to date with
 9 changes and developments in the lifts industry and
 10 guidance and such?
 11 A. It's a very good question. We're not directly told when
 12 the standards are coming out, but we are made aware
 13 through the trade that they are coming out. The only
 14 time we see the standards is if we ask for them from the
 15 company.
 16 Q. Thank you, that's helpful. We'll touch on different
 17 standards in a minute.
 18 So at Apex, you worked as a project manager. Can
 19 you explain briefly what that role entails, please?
 20 A. It was mainly running modernisation projects, or
 21 refurbishment projects.
 22 Q. Which part of the project would you be involved in?
 23 Would it be tendering or would it be the actual works?
 24 A. No, I would get involved just before the site start, the
 25 site works start.

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1 Q. So someone else at Apex will sort out the preliminary
 2 stages?
 3 A. Correct.
 4 Q. How many modernisation or refurbishment projects had you
 5 worked on before the Grenfell Tower project, please?
 6 A. Quite --
 7 Q. Approximately.
 8 A. Quite a few.
 9 Q. Turning to your qualifications, if we can show
 10 paragraph 6 on the next page {APX00008780/2}, please.
 11 So some of the qualifications and courses you list
 12 there, I can understand what they are, but J5 and J25,
 13 are those lift engineer qualifications?
 14 A. They're the lift industry qualifications from -- ie
 15 a mate to a fitter.
 16 Q. Where in the third bullet point you refer to in-house
 17 Otis-delivered training, is any of that relevant to lift
 18 fire safety?
 19 A. Yes.
 20 Q. Can you elaborate, please?
 21 A. The Otis-delivered training would be when I trained as
 22 a test engineer, which is -- at that point I would come
 23 into contact with the standards, because we have --
 24 obviously have to test to British Standards or
 25 EN standards.

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1 Q. I see, thank you very much.
 2 So in your role as project manager, in addition to
 3 your lift testing engineer role, would you come across
 4 British and European Standards as well or is it --
 5 A. Yes.
 6 Q. -- much the same?
 7 In terms of the period before you joined Apex in
 8 about 2005, did you receive training on the principles
 9 and requirements of British Standard 5588-5:1991, fire
 10 precautions in the design, construction and use of
 11 building, part 5, code of practice for firefighting
 12 stairs and lifts?
 13 A. No specific training, but I am aware of that document.
 14 Q. So is it fair to say you were familiar with its
 15 requirements in substance?
 16 A. Yes.
 17 Q. If you did need to consult it in detail, is that
 18 something you would have had in your workplace or had
 19 access to otherwise?
 20 A. If you were employed by a company, they would have that
 21 on file, yes.
 22 Q. Similar questions in relation to another standard,
 23 BS EN 81-72:2003, safety rules for the construction and
 24 installation of lifts, particular applications for
 25 passenger and goods lifts, firefighter lifts. It's

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1 quite a long title there, but the same questions: is
 2 that one that you were familiar with?
 3 A. Yes, I'm familiar with it, but no specific training.
 4 Q. Yes. Again, is that one you could obtain access to via
 5 your employer?
 6 A. Yes.
 7 Q. Another one we'll look at is BS 5588-5:2004, so this is
 8 an update to the 1991 version which was published in
 9 November 2004. Does that ring any bells?
 10 A. I haven't seen the update.
 11 Q. You mentioned when I started asking you questions about
 12 how knowledge about guidance coming out gets circulated.
 13 Would you have expected to have been told by your
 14 employers or any professional organisation that this has
 15 in fact come out?
 16 A. Sometimes we hear of new regulations coming out,
 17 sometimes we don't. It's just ... if we need it, we
 18 have to obtain it from somewhere.
 19 Q. So is your evidence that when you were with Apex, there
 20 wasn't a structured way for you to be updated, such as
 21 "New regulations this month" emails or similar?
 22 A. No.
 23 Q. Finally, did you receive any training on the statutory
 24 guidance documents, so that's the Secretary of State's
 25 guidance on fire safety under the Building Regulations,

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1 Approved Document B?
 2 A. No specific training.
 3 Q. Were you aware of this document?
 4 A. No.
 5 Q. In relation to firefighting lifts specifically, did you
 6 receive any other training which you haven't mentioned
 7 already on the design requirements of such lifts?
 8 A. No specific training, no.
 9 Q. What about general awareness? What is your level of
 10 knowledge about them in around 2005?
 11 A. Yes, I've worked on firefighting lifts.
 12 Q. When you worked on them, would it be a case of you being
 13 able to obtain the relevant documents?
 14 A. Yes.
 15 Q. So your last question might have answered this one as
 16 well, but did you receive any training on the types of
 17 buildings in which a firefighting lift would be
 18 installed?
 19 A. No specific training.
 20 Q. Turning now to a slightly different topic, which is your
 21 previous experience of working on high-rise residential
 22 buildings.
 23 A. Yes.
 24 Q. Have you ever managed a lift refurbishment or
 25 modernisation project in a high-rise residential

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1 building?
 2 A. Yes.
 3 Q. Can you assist in terms of what those works generally
 4 would involve?
 5 A. It was a very similar scheme to the scheme at
 6 Grenfell Tower.
 7 Q. Can you give us any details about the building in
 8 question?
 9 A. Yes, it was the Barbican Estate, the three tower blocks
 10 on the Barbican Estate.
 11 Q. Would it involve a replacement of the lifts, new lifts
 12 being put in?
 13 A. Yes, a very similar scheme.
 14 Q. What was the result of that scheme? Were firefighting
 15 lifts put in as a result of --
 16 A. No, because it was classed as a refurbishment.
 17 Q. Now, a few questions about your professional background
 18 in relation to some of the participants in this project.
 19 The Tenant Management Organisation, which operated
 20 Grenfell Tower, did you work with them prior to the
 21 Grenfell Tower project?
 22 A. No.
 23 Q. Whilst you were working with the TMO on the tower
 24 project, did you have much contact with the TMO?
 25 A. As I say, my involvement started just shortly before we

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1 started on site, so we would have project meetings
 2 fortnightly to start with and then I think it was
 3 monthly, if I recall.
 4 Q. Was your experience of any TMO staff dealing with lifts
 5 you came across that they had awareness of the British
 6 and European requirements for lifts?
 7 A. No.
 8 Q. Was there anyone in particular that springs to mind when
 9 you answer that?
 10 A. I can't recall anybody having knowledge of the
 11 regulations at the meeting.
 12 Q. A gentleman called Robin Cahalarn who was employed at
 13 TMO, is that someone you came across?
 14 A. I can't recall if he sat at the meetings that
 15 I attended.
 16 Q. And Dave Steppel, David Steppel?
 17 A. No, I never met ...
 18 Q. Thank you.
 19 So the next set of questions I'm going to ask you
 20 about is about your specific role at Grenfell Tower.
 21 So you've explained the role of the project manager,
 22 and now we're going to focus on the relationship between
 23 different parties on that project.
 24 What was Butler & Young's role in the project,
 25 please?

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1 A. They were the consultants, the lift consultants for the
 2 project.
 3 Q. And what was Apex's role?
 4 A. Apex were carrying out the works on Grenfell on the
 5 lifts.
 6 Q. So is it right that Butler & Young produced
 7 a specification to which --
 8 A. Yes.
 9 Q. -- you worked?
 10 At paragraph 14 of your statement, page 3
 11 {APX00008780/3}, please, if we can turn that up, you
 12 say:
 13 "I was the project manager at the time. I was not
 14 involved in the procurement of the work, nor the
 15 costing/tendering. My first engagement would have been
 16 in relation to the planning of labour for the job and
 17 the timescales for site works. Thereafter dealing with
 18 consultant's issues, attending consultants' meetings,
 19 and site monitoring, testing, snagging and handover."
 20 These are all matters you were just telling us
 21 about?
 22 A. Correct, yes.
 23 Q. When you refer there to consultants' issues, who do you
 24 mean and what are the issues?
 25 A. If we found anything on site that would maybe not comply

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1 to specification , we would get in touch with the
 2 consultant and discuss.
 3 Q. And did that happen at all, frequently?
 4 A. Not to my recollection.
 5 Q. You mention here in your evidence meetings held between
 6 Apex and Butler & Young. Was the design of the lifts
 7 ever discussed at those meetings?
 8 A. No. When I say meetings, we would have on-site meetings
 9 probably fortnightly .
 10 Q. Yes. And during those meetings there was no discussion
 11 of design?
 12 A. No.
 13 Q. If you did have any concerns, comments or suggestions
 14 about the lift design within the specification , is that
 15 something you feel you could have raised with
 16 Butler & Young?
 17 A. Could have raised, yes.
 18 Q. And if there were any safety concerns specifically with
 19 the proposal, is that something you felt able to raise?
 20 A. Yes, definitely .
 21 Q. In your past experience of different projects, did you
 22 ever raise such issues?
 23 A. No, because the consultant's specification is normally
 24 pretty good.
 25 Q. We will discuss the specification now.

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1 At paragraph 17 of your statement {APX00008780/3} --
 2 we don't need to go to it -- you say that part of your
 3 role was ensuring Apex carried out the works in
 4 accordance with the Butler & Young specification; is
 5 that right?
 6 A. That's correct.
 7 Q. Would it be fair to say that, as far as you saw your
 8 role, it was to follow the letter of that specification ?
 9 A. Exactly.
 10 Q. Can we please go to {BUT00000044/23}, and just zoom in
 11 on the bottom part of that page, please, the design
 12 standards, 2A.06:
 13 "The equipment and installation shall conform to
 14 this specification and to the relevant British Standards
 15 including Codes of Practice and, in particular , BS 5655,
 16 BS 7255 and EN81-1. Where this specification differs
 17 from those standards and codes, the provision of this
 18 specification shall prevail.
 19 "Reference to British Standards and Codes of
 20 Practice shall mean the edition current three months
 21 prior to the date for return of tenders. A certificate
 22 of compliance with the relevant British Standards shall
 23 be provided to the SO ..."
 24 That's supervising officer ?
 25 A. Yes.

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1 Q. "... on request. Any changes during the course of the
 2 contract in the relevant British Standards and Codes of
 3 Practice shall be brought to the attention of the
 4 [supervising officer] by the Contractor."
 5 So SO here is Butler & Young; is that right?
 6 A. Correct.
 7 Q. "It shall be understood that the existing
 8 characteristics , particularly dimensions and clearances,
 9 may not comply with current British Standards and these
 10 shall be qualified in the tender return."
 11 So going back to what we just read out, the final
 12 sentence of the first paragraph says that if there is
 13 any disagreement between the standards and the
 14 specification , the provision of the specification will
 15 win out, effectively ; is that right?
 16 A. Yes, correct.
 17 Q. And is that the basis on which you would have operated
 18 as part of the project?
 19 A. Yes.
 20 Q. In the second paragraph we read about the certificate of
 21 compliance which shall be provided on request. As far
 22 as you're aware, did Butler & Young request
 23 a certificate of compliance?
 24 A. Certificate of compliance relates to new lifts .
 25 Q. I see. But this specification was in relation to this

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1 particular project , wasn't it ?
 2 A. It was.
 3 Q. And from your witness statement, your evidence is that
 4 it wasn't a new lift .
 5 A. It was not a new lift , no.
 6 Q. In those circumstances, did you have any cause to ask:
 7 why is this in here at all ?
 8 A. None.
 9 Q. So your evidence is that no certificate was requested or
 10 provided; is that right ?
 11 A. As far as I recall , no.
 12 Q. Can we please go to page 24 {BUT00000044/24}, the next
 13 page over.
 14 There's a section there, 2A.07, "Related
 15 Documentation and References":
 16 "This tender documentation shall be read in
 17 conjunction with, and its requirements are in addition
 18 to, the general conditions of contract and any drawings
 19 and other documents issued with it and listed in this
 20 invitation to tender and as set out below."
 21 If we look at the fourth entry from the bottom,
 22 please:
 23 "BS 5588 — Fire Precautions in the design,
 24 construction and use of building."
 25 As we've seen earlier , one of the BS 5588 standards

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1 is to do with firefighting lifts ; yes?
 2 A. Correct.
 3 Q. So this regulation, the British Standard, appeared in
 4 the list of standards to be read in conjunction with the
 5 specification . Does that suggest that compliance with
 6 firefighting lift standards should have been considered
 7 by Apex in its work?
 8 A. Not on a refurbishment, no.
 9 Q. Can you expand on that, please? Why not?
 10 A. You would have constraints, building constraints, to
 11 comply fully with the firefighting lifts .
 12 Q. What building constraints in this particular project did
 13 you have to deal with?
 14 A. Water dispersal, two methods of, you need, secondary
 15 power supplies, intercom systems.
 16 Q. And would any, in your experience, of those features
 17 have been insurmountable in this case?
 18 A. Well, insurmountable ... to get the water dispersal off
 19 the landings would, in my opinion, have been a big task.
 20 Q. So appreciating it's been a long time since these events
 21 occurred, but to the best of your recollection, was the
 22 viability or reasonable practicability of these features
 23 ever discussed or considered amongst the project?
 24 A. Sorry, could you repeat that?
 25 Q. Yes, those particular features, the possibility of

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1 putting them into the lifts, was that ever discussed,
 2 either internally at Apex or externally with
 3 Butler & Young?
 4 A. I wasn't part of those discussions, I can't say.
 5 Q. In your witness statement you describe this as a major
 6 project.
 7 A. Yes.
 8 Q. In fact, without going into the detail, much of the
 9 machinery of the lifts was replaced, in effect; yes?
 10 A. Yes.
 11 Q. Do you agree that it would have provided an opportunity
 12 to consider upgrading the lifts to have the features of
 13 the firefighting lift as far as reasonably practicable?
 14 A. I mean, it could be done, but it wouldn't comply, so it
 15 couldn't be called a firefighting lift . The test
 16 engineer couldn't sign it off as a firefighting lift .
 17 And a firefighting lift, if I recall correctly, has to
 18 serve every floor, and I think at the time, Grenfell --
 19 there was two floors that the lift didn't serve at that
 20 time.
 21 Q. Yes, and does that relate only to residential floors or
 22 any floors?
 23 A. I'm not sure. I think it's residential .
 24 Q. Thank you. Well, the Inquiry will be hearing from
 25 Mr Howkins, an expert, to --

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1 A. Yeah. I'm not sure on that point.
 2 Q. Thank you.
 3 You say at paragraph 15 of your statement
 4 {APX00008780/3} -- we don't need to go to it -- that you
 5 read the specification before you started work.
 6 Did you suggest or did anyone else within Apex to
 7 your knowledge that the lifts at Grenfell Tower should
 8 either be firefighting lifts outright or have more
 9 features of firefighting lifts ?
 10 A. Firefighting lifts outright.
 11 Q. So my question was whether anyone suggested that
 12 firefighting lifts should be put in. Is your answer
 13 that --
 14 A. No, I can't remember anybody suggesting that.
 15 Q. The evidence from the Butler & Young author of the
 16 specification, Ian Moorhouse, last week was that the TMO
 17 provided specific instruction to Butler & Young not to
 18 consider the feasibility of installing firefighting
 19 lifts and the specification was drafted accordingly.
 20 Were you aware of that instruction --
 21 A. No.
 22 Q. -- from the TMO? So it's not something that was
 23 discussed --
 24 A. I wasn't involved in those discussions, no.
 25 SIR MARTIN MOORE--BICK: Mr Anthony, I'm going to interrupt

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1 just for a moment.
 2 I know you're keen to give us your evidence and
 3 we're very keen to hear it, but it would help if you
 4 could let counsel finish his question before you
 5 respond, because it's difficult for the transcriber if
 6 people are talking at the same time.
 7 A. Okay, sorry.
 8 SIR MARTIN MOORE--BICK: No, it's all right, I understand,
 9 but that would help. Thank you.
 10 MR USTYCH: Thank you very much, Mr Chairman.
 11 So if you weren't aware of that instruction, do you
 12 agree that Apex, as a lifts contractor, should have
 13 raised the issue, to at least discuss it, of whether the
 14 lifts should be firefighting lifts or at least have more
 15 features of a lift ?
 16 A. Not at that time. I mean, I've never seen a fully
 17 compliant firefighting lift in any local authority
 18 building to this day, actually. So why would it be
 19 different at Grenfell? I don't know.
 20 Q. Is your evidence, then, that it's more likely to find
 21 a firefighting lift in a non-local authority building?
 22 A. I don't know if that's the case, but in my experience,
 23 I have never seen a fully compliant firefighting lift in
 24 a local authority building.
 25 SIR MARTIN MOORE--BICK: Just for our enlightenment, is that

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1 because there are particular features which local
 2 authorities are not keen on, or were they just different
 3 reasons --
 4 A. It could be. I don't know the details, but I can only
 5 tell this Inquiry what I've seen from experience.
 6 SIR MARTIN MOORE-BICK: Quite, yes. I just wondered whether
 7 there was something common to all the lifts that you had
 8 seen in local authority buildings.
 9 A. They follow a pretty standard specification, most of
 10 them.
 11 SIR MARTIN MOORE-BICK: Right. Yes, all right. Thank you.
 12 MR USTYCH: Thank you.
 13 I will ask Mr Operator to go to Mr Howkins' expert
 14 report, which is at {RHO00000003/143}.
 15 Zooming in on the bottom paragraph, please, which
 16 I'll just read out. If you follow along, Mr Anthony,
 17 just in fairness, to give you an opportunity to comment
 18 on what Mr Howkins says there:
 19 "My view, based on good industry practice, is that
 20 Apex, first as a tenderer for the contract and then as
 21 a sub-contractor, had a duty to inform B&Y that the
 22 specification did not comply with the relevant codes and
 23 standards. It is likely that the first appropriate
 24 point at which this should have been raised was the
 25 initial site visit, as part of the tendering process."

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1 You've explained you weren't involved in that.
 2 A. No.
 3 Q. "Had it not been raised at this point, it should have
 4 been raised subsequently, for example once Apex was
 5 awarded the contract. Ideally this would have been in
 6 writing or would have been documented in the minutes of
 7 the meetings."
 8 In relation to the second part of that, involving
 9 sort of post-tender work, do you agree or disagree with
 10 his assessment?
 11 A. That they could fit parts of a firefighting lift?
 12 Q. That it was good industry practice --
 13 A. No, it was --
 14 SIR MARTIN MOORE-BICK: Just a minute. I think the point
 15 that counsel is asking you to consider that's being made
 16 here is that Apex should have drawn the attention of
 17 Butler & Young to the fact that this would not comply
 18 with current standards.
 19 Is that right, Mr Ustych?
 20 MR USTYCH: Yes, thank you, Mr Chairman.
 21 A. With current standards, as in firefighting standards?
 22 SIR MARTIN MOORE-BICK: Yes.
 23 A. No, it wouldn't have complied.
 24 SIR MARTIN MOORE-BICK: No, but the question is: should Apex
 25 have said something to Butler & Young to say, "You

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1 realise this isn't going to comply with current
 2 standards"?
 3 A. Not really, because Butler & Young would have had that
 4 discussion with the client. So once the specification
 5 is set, then we follow the specification.
 6 MR USTYCH: If I understand your evidence, Mr Anthony, once
 7 you see the specification, you made the assumption that
 8 it's already been dealt with; is that what you're
 9 saying?
 10 A. Yes.
 11 Q. In your general experience, it's a variation on the
 12 question I asked you in relation to safety issues, but
 13 have you ever told lift consultants or clients on
 14 previous projects that the specification didn't comply
 15 with the relevant standards for lifts?
 16 A. Clients, sometimes. Rarely consultants.
 17 Q. Is that because you assume consultants to have more
 18 knowledge of --
 19 A. Yes.
 20 Q. -- what those are?
 21 Turning to a different topic now, the fire control
 22 switch.
 23 If we can please go to {BUT00000044/60}. This
 24 section of the specification deals with a fireman's
 25 control switch.

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1 Is it right that this switch was to be installed on
 2 the ground floor at Grenfell Tower?
 3 A. Yeah, which was the fire service access level.
 4 Q. Yes. And the control switch set out in the
 5 specification is designed to be operated with an express
 6 drop release key?
 7 A. Correct.
 8 Q. And we've heard evidence from Butler & Young last week
 9 that the TMO had specifically requested the fireman's
 10 switch was operable with that type of key; were you
 11 aware of that?
 12 A. I was, yes.
 13 Q. What information were you given about that, please?
 14 A. About the key?
 15 Q. About the decision that it must be an express drop key.
 16 A. It's standard practice on local authority lifts to use
 17 that key.
 18 Q. The relevant standard --
 19 A. At the time, sorry. At that time, sorry.
 20 Q. Has that changed now?
 21 A. I believe some have gone to the triangle key.
 22 Q. I see. You referred to the triangle key. The relevant
 23 standards at the time required the switch to be operated
 24 by a Euro key, which is a triangular --
 25 A. Yes, that's the triangle key, yes.

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1 Q. Yes. I'm sorry to remind you again, if you could just
2 wait until I finish my question, please. Thank you.
3 So the dimensions of that triangle key, unlike an
4 express drop key, are specified in the regulations,
5 aren't they?
6 A. Sorry, could you repeat that?
7 Q. Yes. The dimensions of the Euro triangular key are
8 written out in the regulations?
9 A. Yes.
10 Q. What was the concern, as far as you're aware, of using
11 that type of key, as you said, in a local authority
12 building?
13 A. The triangle key?
14 Q. No, the express drop key.
15 A. The express drop key was used in nearly all local
16 authority buildings at that time.
17 Q. Yes, I apologise, it's entirely my bad, Mr Anthony,
18 I meant to ask: what was the concern about using the
19 triangular Euro key in local authority buildings?
20 A. I believe at that time they were quite easily available.
21 Q. The Inquiry's received evidence from a firefighter who
22 bought three of the express drop keys from eBay. Were
23 you aware at the time about their availability online or
24 to be accessed in that way?
25 A. Not at that time, no.

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1 Q. Did you express any concerns to the TMO about the choice
2 of that express drop key or was it just standard
3 practice?
4 A. No, I didn't express any concerns at all.
5 Q. Turning next to the issue of how the works themselves
6 went day to day.
7 At paragraph 19 of your statement, if we can go to
8 that, please, on page 4 {APX00008780/4}, you say:
9 "As far as I can recall the project ran smoothly and
10 delivery was to schedule."
11 We're just going to look at some documents from that
12 time describing the works.
13 If we go to {APX00005627}, please.
14 If we zoom in on the top half, please, we can see
15 it's a letter from Steve Ellis at Butler & Young to
16 Warren Jenchner at Apex.
17 The first paragraph I'll read out for you:
18 "It is with a certain amount of sadness and a great
19 deal of frustration that I am obliged to send your
20 company the attached certificate of non completion,
21 something I have had to do only twice before during my
22 fifteen years as a consultant."
23 Are you familiar with that letter?
24 A. No.
25 Q. No. Were there some problems in the running of the

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1 project?
2 A. There will always be problems on a major project on this
3 scale, but from memory, I can't recall anything too
4 drastic, to be quite honest.
5 Q. We'll look at a document which may help jog your memory,
6 which is {APX00000093}, please. This is a response from
7 Warren Jenchner on 13 January 2006 to Steve Ellis
8 detailing a number of problems.
9 If we could scroll down just a bit, please, so we
10 can see more of the text.
11 First of all, is this a letter that you've seen
12 before?
13 A. No.
14 Q. No. Well, I'm going to ask you about some of the
15 particular issues mentioned there.
16 First is access to the building is very restricted.
17 A. Yeah, that's correct, yes.
18 Q. Then there is a reference in the middle of the page,
19 beginning with:
20 "It was decided that we would have to devise
21 a revolutionary method of moving the guides to
22 accommodate the new 12 person lift installation.
23 "The method finally agreed in hindsight was time
24 consuming and labour intense, although as with all new
25 systems the works became easier on the second lift."

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1 Does that sound familiar at all?
2 A. Yes.
3 Q. Can you explain what those issues were, please?
4 A. Sorry?
5 Q. Well, what was the issue with using this new guide rail?
6 A. The guide rails had to be relocated to accommodate the
7 new car, which would have meant complete scaffolding of
8 the lift shaft to move them.
9 Q. Looking at these documents, do you accept that the
10 project doesn't seem to have run smoothly and to
11 schedule, as you said --
12 A. These are quite standard problems on a job this size.
13 Q. The lifts had to be refurbished with residents still
14 living in the tower. Did that affect the options
15 available to you doing the works?
16 A. That was quite restrictive, but it's normal practice on
17 local authority lifts.
18 Q. I'm now going to turn to the issue of commissioning of
19 lifts.
20 At paragraph 18 of your statement, on page 3
21 {APX00008780/3}, if we could have a look at that,
22 please:
23 "Once the works were completed, I tested one of the
24 lifts as Apex's normal tester was unavailable at that
25 time."

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1 A. Correct.
 2 Q. "A copy of the test certificate is attached marked
 3 exhibit ..."
 4 There is a number there. For the transcript, that
 5 number has a typo in it. It should end in a 2.
 6 "A test of a lift involved all static and dynamic
 7 tests of the lift equipment and functions."
 8 Picking up on that, why did you test only one of the
 9 two lifts?
 10 A. Because Apex's normal tester was available for the
 11 second lift, so he tested the second lift. I believe he
 12 was on holiday at the time that the first lift came up
 13 for testing.
 14 Q. We will have a look at the relevant documentation.
 15 If we can go to {APX00008692/65}, please.
 16 We can see, if we can enlarge the top half, please,
 17 that on the right there, under "Purchasers
 18 identification [number]", it says "H091"; yes?
 19 A. Correct.
 20 Q. Is that the lift that --
 21 A. That's the lift number.
 22 Q. That's the lift you dealt with?
 23 A. Yes.
 24 Q. Can you explain briefly, please, the sort of test that
 25 you would do within the static, dynamic, functional

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1 framework while commissioning a lift?
 2 A. It will take a while to go through the test sheet.
 3 Q. Focusing on the ones which have to do with fire safety
 4 in particular.
 5 A. Fire safety, you would check the landing doors were --
 6 all the elements were correctly fitted for the fire
 7 rating, as in the smoke fillets and the door brackets,
 8 the extra door brackets to stop -- well, to try and
 9 prevent buckling of the frame if it was under fire
 10 conditions. Apart from that, it's just the fire
 11 controls on the ground.
 12 Q. We'll look at the relevant parts of the certificate in
 13 a minute.
 14 Can we please go to page 69 of the same document
 15 {APX00008692/69}.
 16 Focusing on section 2.9 near the middle of the page
 17 there, you mentioned in your answer just now the landing
 18 door assemblies, and it says that:
 19 "a) Does the contract require the landing door
 20 assemblies to be fire-rated. Yes.
 21 "If YES what is the fire-rating requirement.
 22 2 Hour.
 23 "b) is the test certificate available and in order.
 24 Yes.
 25 "c) If yes and the doors are manually operated is

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1 the means of fire prevention a fusible link. [Not
 2 applicable]."
 3 So can you explain, please, what that means in
 4 practice? How would you test that or check that?
 5 A. It's basically a visual check, as you would inspect the
 6 inside of the landing entrances from the car top to make
 7 sure all the elements of the fire rated doors were
 8 fitted.
 9 Q. Did you check at that time any test certification or
 10 documentation to do with the doors?
 11 A. No, being project manager for the job, I knew at that
 12 time that they were -- the -- they were being
 13 independently assessed for the fire certificate, for the
 14 two-hour rating.
 15 Q. So when you ticked "Yes" to "Is the test certificate
 16 available and in order", you didn't actually have the --
 17 A. I didn't -- no, I -- as I say, being the project manager
 18 for the contract, I knew the doors were being rated --
 19 fire rated. I can't -- I think it was Warringtons,
 20 I can't remember who it was.
 21 Q. Can we turn to page 80 {APX00008692/80}, please, and
 22 zoom in on the bottom half, please. Scroll down just
 23 a little bit, please, so we can see the whole of the box
 24 at the bottom.
 25 So the form there, we can see next to the two boxes,

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1 says the emergency operation system was demonstrated to
 2 Steve Ellis at Butler & Young.
 3 A. Correct.
 4 Q. Emergency operation system, what are the components to
 5 that system, please?
 6 A. The emergency operation system?
 7 Q. Yes.
 8 A. That'd be the fire control.
 9 Q. So it is just another word for the fire control?
 10 A. Yeah.
 11 Q. How would you have tested that fire control switch?
 12 A. Well, by turning the switch at the ground floor, make --
 13 we would normally turn the switch when the cars were
 14 travelling in the up direction to make sure that it
 15 stopped at the next available floor, the doors did not
 16 open, and they would return to the fire service access
 17 level, at which point the fire service could take
 18 control of the lifts.
 19 Q. The Inquiry's heard evidence that this was a duplex
 20 system.
 21 A. Correct.
 22 Q. So one switch for two lifts.
 23 A. Correct.
 24 Q. Are you able to recall when you activated the switch,
 25 did both come down?

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1 A. Both. Both lifts came down. Sorry, no, they wouldn't
 2 have done at that time, I did the first lift. No, it
 3 was just that one.
 4 Q. The second one was still --
 5 A. It was still under construction, yes.
 6 Q. I see.
 7 What key did you use to activate the fire control
 8 switch at that time?
 9 A. It would have been the express drop key.
 10 Q. Are you able to say where it would have been obtained
 11 from, manufactured from, sold by?
 12 A. It would have been obtained from Lift Components
 13 Limited, which are the only company that supplied that
 14 key.
 15 Q. Is that something you would have obtained via Apex?
 16 A. Yes.
 17 Q. Thank you.
 18 Just a final reference in this document, page 82
 19 {APX00008692/82}, please. It's the end of the
 20 certificate. Is that your signature at the bottom?
 21 A. It is.
 22 Q. And on the next page, please {APX00008692/83}. There as
 23 well; yes?
 24 A. Yes.
 25 Q. Just a few final questions to do with the automatic fire

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1 recall system.
 2 The Inquiry heard evidence from Mr Ellis at
 3 Butler & Young last week that there was a system of that
 4 nature installed as part of the works that we're
 5 discussing here or shortly following it; do you recall
 6 that?
 7 A. No, it was -- I think that was after the works were
 8 finished, that was installed.
 9 Q. And that wasn't in the specification?
 10 A. No.
 11 Q. Do you have any knowledge as to whether the system was
 12 disconnected, if so by whom and when?
 13 A. No.
 14 MR USTYCH: Thank you very much.
 15 Mr Chairman, those are the end of my pre-prepared
 16 questions.
 17 SIR MARTIN MOORE-BICK: Oh, right.
 18 Well, Mr Anthony, when counsel says he has got to
 19 the end of his questions, we always have a short break
 20 to, first of all, give him a chance to make sure that he
 21 has not actually missed anything out, and also to give
 22 other people who aren't here a chance to suggest
 23 additional questions that perhaps we ought to ask you.
 24 So we'll have a break now. How long do you think,
 25 Mr Ustych? Is ten minutes long enough?

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1 MR USTYCH: That will be fine, thank you.
 2 SIR MARTIN MOORE-BICK: We will say 12.10, and then, when
 3 you come back, we'll see if there are any more questions
 4 we need to ask you.
 5 THE WITNESS: Thank you.
 6 SIR MARTIN MOORE-BICK: While you're out of the room, please
 7 don't talk to anyone about your evidence or anything to
 8 do with it.
 9 If you would like to go with the usher, she'll look
 10 after you.
 11 THE WITNESS: Thank you.
 12 SIR MARTIN MOORE-BICK: Thank you.
 13 (Pause)
 14 Right, 12.10, then, please. Thank you.
 15 (12.00 pm)
 16 (A short break)
 17 (12.10 pm)
 18 SIR MARTIN MOORE-BICK: Right, Mr Anthony. Well, we'll see
 19 if there are any more questions for you.
 20 Yes, Mr Ustych.
 21 MR USTYCH: No more questions, Mr Chairman, which leaves me
 22 to thank you, Mr Anthony, for your time and assistance
 23 today.
 24 THE WITNESS: Thank you.
 25 SIR MARTIN MOORE-BICK: Well, Mr Anthony, thank you very

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1 much indeed for coming to give your evidence. We
 2 haven't taken a lot out of your morning, but it's
 3 probably ruined your day, because you probably had
 4 something else to do. But it's been very helpful to
 5 hear from you, so we are very grateful to you for coming
 6 along, and now you're free to go.
 7 THE WITNESS: Thank you.
 8 SIR MARTIN MOORE-BICK: And if you would like to go with the
 9 usher, she'll look after you. Thank you very much.
 10 (The witness withdrew)
 11 SIR MARTIN MOORE-BICK: Yes, Mr Ustych. I think we have
 12 another witness on the programme, don't we, but he is
 13 not perhaps yet ready; is that right?
 14 MR USTYCH: That's my understanding, Mr Chairman, yes.
 15 Mr Wallis.
 16 SIR MARTIN MOORE-BICK: He was asked to be here for
 17 2 o'clock; is that right?
 18 MR USTYCH: Yes.
 19 SIR MARTIN MOORE-BICK: Well, in that case, we'll break now
 20 and we'll resume at 2 o'clock, when we shall look
 21 forward to seeing the next witness.
 22 MR USTYCH: Thank you, Mr Chairman.
 23 SIR MARTIN MOORE-BICK: Good, thank you very much.
 24 2 o'clock, then, please.
 25 (12.12 pm)

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1 (The short adjournment)
 2 (2.00 pm)
 3 SIR MARTIN MOORE—BICK: Yes, Mr Ustych. Now, you have
 4 another witness for us.
 5 MR USTYCH: Yes. May I call Mark Wallis, please.
 6 SIR MARTIN MOORE—BICK: Good. Thank you very much.
 7 MR MARK WALLIS (affirmed)
 8 SIR MARTIN MOORE—BICK: Thank you very much. Do sit down,
 9 please, and make yourself comfortable.
 10 (Pause)
 11 Right.
 12 Yes, when you're ready, Mr Ustych.
 13 Questions from COUNSEL TO THE INQUIRY
 14 MR USTYCH: Thank you.
 15 Can you please give the Inquiry your full name?
 16 A. It's Mark Scott Wallis.
 17 Q. Thank you very much for coming to give evidence today.
 18 Before I ask questions, I would like to remind you
 19 of a few procedural points, if I may.
 20 First of all, feel free to ask for a break at any
 21 point.
 22 If I am speaking too quickly or too quietly or in
 23 a convoluted way, please do ask me to rephrase my
 24 question.
 25 A. Okay.

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1 Q. Please do keep up your voice so the transcriber can hear
 2 you, and also just wait until I have finished speaking,
 3 and equally I will wait until you finish speaking, so
 4 that the transcript can be maintained accurately.
 5 A. Okay, thank you.
 6 Q. You have made a witness statement for the Inquiry. I'm
 7 going to take you to that first. It's {PDR00000036}.
 8 If we go to the final page, please, page 9, that's
 9 dated 28 October 2019. Is that your signature?
 10 A. That is.
 11 Q. Have you read your statement recently?
 12 A. I have.
 13 Q. Can you confirm the contents are true?
 14 A. Yes.
 15 Q. Have you discussed your evidence with anyone before
 16 coming here today?
 17 A. No.
 18 Q. Thank you.
 19 I'm going to start by asking you some questions
 20 about your employment history and qualifications. For
 21 the transcript, this relates to paragraphs 5 to 6 of
 22 your statement {PDR00000036}, but we don't need to turn
 23 them up.
 24 You began working in 1990 in the Schindler Group as
 25 an apprentice technician; is that right?

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1 A. Yes, sir.
 2 Q. In this period, you also obtained a BTEC in lift
 3 engineering.
 4 A. Yes, sir.
 5 Q. Then you took two years of on—the—job training.
 6 A. That's correct, yeah.
 7 Q. And then you went on to obtain an Ordinary National
 8 Certificate in lift engineering.
 9 A. Yes.
 10 Q. Then you were appointed a senior engineer in about 1998.
 11 A. That's correct.
 12 Q. You then went on to complete a level 4 NVQ in lift
 13 engineering in around 2003/2004.
 14 A. That's correct.
 15 Q. In 2016, you joined Otis PDERS; is that right?
 16 A. Yes.
 17 Q. Before we move on with my questions, can you explain, as
 18 best you can, without getting too technical and legal,
 19 what is the relationship between PDERS and Otis? Are
 20 they one and the same or ...?
 21 A. They're a subsidiary company. They're all under the one
 22 banner, but they run as separate entities.
 23 Q. So is PDERS the subsidiary?
 24 A. Yes.
 25 Q. Thank you.

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1 So overall, by 2017, you had been working in the
 2 lifts industry since 1990, so about 27 years.
 3 A. That's correct.
 4 Q. Turning now to your involvement in maintenance at
 5 Grenfell Tower.
 6 Can we turn up paragraph 7 of the witness statement,
 7 please, {PDR00000036/2}. It says there, just
 8 summarising, that in April 2017 you were assigned to
 9 work the KCTMO contract covering 60 units, and that
 10 included the lifts at Grenfell Tower; yes?
 11 A. That's correct.
 12 Q. Just to clarify for us, please, when you say units, is
 13 that buildings or lifts?
 14 A. That's a single lift.
 15 Q. Your role was a lead engineer?
 16 A. That's correct.
 17 Q. What were the responsibility of a lead engineer?
 18 A. I was in charge of the team running day to day, also in
 19 contact with KCTMO on weekly meetings, and also daily if
 20 they required me to do something or action something to
 21 do with the lifts, basically.
 22 Q. So were you the point man for this contract?
 23 A. I was, yeah.
 24 Q. As part of your on—the—ground activities, did you
 25 undertake routine as well as reactive maintenance?

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1 A. Yes.
 2 Q. That's including at Grenfell Tower?
 3 A. Yes.
 4 Q. So if someone had an issue and you were on duty, you
 5 would go and respond to that call to fix the lift?
 6 A. Yes, I would, yes.
 7 Q. If you can cast your mind back to when you started this
 8 contract, when you were assigned to it, when you took it
 9 over, this route, what information or documents were you
 10 given about the lifts at Grenfell Tower in particular?
 11 A. Not any documentation specifically relating to Grenfell
 12 at all, to be honest with you. I was given a route
 13 list, which told me what lifts were in which buildings
 14 and how many there were, but that's about it.
 15 Q. Did you think that you should ask for more information
 16 or more documents about lifts at a particular building?
 17 A. No, because doing our job, you generally — a lift is
 18 a lift, yeah? They do have different control systems,
 19 but it's still a box that goes up and down on wires.
 20 Q. Did you have a handover from your predecessor as the
 21 lead engineer?
 22 A. Not my predecessor as the lead engineer, but my team
 23 actually helped me and introduced me to the area where
 24 the buildings were, how — like, you know, previous
 25 issues that they'd had, we'd sat down and we'd had

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1 a discussion about that, and, yeah, they were pretty
 2 helpful to me.
 3 Q. Appreciating this is some time ago, but to the best of
 4 your recollection, was any mention made of any previous
 5 issues at Grenfell Tower in this chat?
 6 A. Only with the door gear. That was the only thing that
 7 was brought to me.
 8 Q. Can you help us, please?
 9 A. The noise on the doors, the actual car doors themselves.
 10 That was actually brought to me by Patrick Barrett, who
 11 was my point of contact at KCTMO.
 12 Q. Thank you. We'll get to some specific issues later in
 13 the questioning.
 14 Did you feel that you had enough information, based
 15 on your experience, to deal properly with maintenance at
 16 Grenfell Tower, even though you didn't have documents?
 17 A. Yes.
 18 Q. Looking at routine maintenance visits generally, how
 19 often would you have those at Grenfell Tower?
 20 A. Once a month.
 21 Q. And how long would a typical maintenance visit last?
 22 A. Roughly two hours. It's 24 floors, so roughly around
 23 about two hours.
 24 Q. Is that two hours per lift?
 25 A. Per lift, yeah.

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1 Q. Four hours in total; yes?
 2 A. Yeah.
 3 Q. Would you do the routine visits alone or with
 4 a colleague?
 5 A. It depended, really. I mean, generally you would be
 6 alone, because we do single-man working, but they liked
 7 us to work two men as much as possible. I did end up
 8 having, long after this happened, but I got an
 9 apprentice and he was with me throughout my time up
 10 there at KCTMO.
 11 Q. I'm going to ask you some questions about what would
 12 actually happen during those two hours per lift, but to
 13 help you refer to a document, can we please see
 14 {PDR00000055}. If we just focus in on the first
 15 paragraph, please.
 16 This is the field service handbook. Does that look
 17 familiar?
 18 A. It's been a while, but yes.
 19 Q. If we look at the top paragraph there, it says that:
 20 "The information contained within this handbook is
 21 intended for use by trained Otis Group Engineers."
 22 So you were one of them?
 23 A. Yes.
 24 Q. Are you able to assist whether this particular document
 25 was something you took with you on jobs or something you

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1 had back in the office?
 2 A. That would have been in the van.
 3 Q. Is this something that you were trained with reference
 4 to when you started?
 5 A. When I first started in my induction, they would have —
 6 yeah, they did show us this document, yes.
 7 Q. Can we go to page 4 of this document {PDR00000055/4},
 8 please. You see section 1a there, "Otis Assurance
 9 Traction Maintenance Procedure". Is this the procedure
 10 which you would have applied to the lifts at
 11 Grenfell Tower?
 12 A. Pretty much, yes. As it was my first visit up there, I,
 13 as due diligence, would have checked everything to make
 14 sure that I was happy with it, as I was a new engineer
 15 looking at those lifts, so I — yes.
 16 Q. That's your April 2017 visit?
 17 A. Yes.
 18 Q. We'll look at the records of that in due course.
 19 Coming back to this document, we see two columns, M1
 20 and M2, and there is also further down, in fact there is
 21 a reference in the black second line to an annual check.
 22 Can you explain to us, please, what M1 and M2 mean,
 23 first of all?
 24 A. I can't remember.
 25 Q. Do they refer to month 1 and month 2 as a rotating

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1 system, or you can't assist us?
 2 A. I can't remember, to be honest with you.
 3 Q. Looking at the substance of what it says there in terms
 4 of checks to be doing, does that look like what you
 5 would check on a normal monthly visit?
 6 A. Yeah, pretty — yes, yes, I would check that, yeah.
 7 SIR MARTIN MOORE—BICK: It looks as though there are some
 8 things which are checked every visit —
 9 A. Yes.
 10 SIR MARTIN MOORE—BICK: — and some which were only checked
 11 perhaps every other visit, I don't know, is that —
 12 A. Yes, that's generally how it works, yeah.
 13 SIR MARTIN MOORE—BICK: Right.
 14 MR USTYCH: Can we look at page 6 of this document
 15 {PDR00000055/6}, please, about halfway down the page.
 16 So reading just above "Riding In Lift Car" in bold:
 17 "The following is the recommended sequence of
 18 inspections for the M1 visit."
 19 So I'm not going to read all of these in detail, but
 20 I'm going to ask the operator to go through them at
 21 a bit of a pace and you can tell us if that looks like
 22 the sort of checks you were doing; is that okay?
 23 A. Okay.
 24 Q. If we go over to page 7 {PDR00000055/7}, you can see
 25 "Machine Room", "Checks when lift is running". There is

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1 an engaging picture of someone checking a risk
 2 assessment there.
 3 A. Yeah.
 4 Q. Over the page again, please {PDR00000055/8}. There we
 5 see "Motor", "Motor Generator", "Selector", "Over speed
 6 Governor", "Landings", "Pit and car top".
 7 A. Yeah, some of this doesn't apply, like motor room
 8 generator, that was, you know, old DC injected lifts.
 9 They're generally AC now, so ...
 10 Q. So if a lift in a particular building had some of these
 11 features, you'd only check those features but not
 12 others?
 13 A. Yes, yeah, you wouldn't check because it wouldn't have
 14 it, so ...
 15 Q. Just the next page, please {PDR00000055/9}. There are
 16 some more checks about the pit and so on.
 17 A. Yeah.
 18 Q. So, overall, is this an accurate summary, would you say,
 19 of maintenance procedures as applicable?
 20 A. Yes.
 21 Q. So we're looking at M1 there, and let's look at M2 now,
 22 which is page 11 {PDR00000055/11}, please.
 23 So you see in bold there:
 24 "The following is the recommended sequence of
 25 inspections for the M2 visit."

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1 So much of it is the same, so again I'm going to
 2 take it quite quickly.
 3 A. Yeah.
 4 Q. "Riding in Lift Car".
 5 Next page, please {PDR00000055/12}. You see much
 6 the same entries, slightly different picture, "Checking
 7 operation of control panel" there.
 8 A. Yes.
 9 Q. And next page {PDR00000055/13}, "Traction", "Checks when
 10 lift is isolated".
 11 If we could scroll through the next two pages,
 12 giving it a few seconds each, we can see "Brake",
 13 "Selector" and so on {PDR00000055/14}.
 14 A. That's a generator, that's —
 15 Q. That's the generator?
 16 A. Yeah. That's a carbon brush.
 17 Q. Thank you.
 18 {PDR00000055/15}. "Top of shaft", "Landing doors"
 19 I imagine applies to all lifts.
 20 16 next, please {PDR00000055/16}. "Counterweight".
 21 A. Yeah.
 22 Q. And lastly 17 {PDR00000055/17}, and we see the pit and
 23 underside again.
 24 So would you agree that the manual we've just seen
 25 sets out a detailed procedure for the maintenance

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1 visits?
 2 A. It does, yes.
 3 Q. Thank you.
 4 Turning to maintenance visits specifically and what
 5 you would accomplish on them, at paragraph 7 of your
 6 statement {PDR00000036/2} — we don't need to turn it
 7 up — you referred to carrying out checks detailed in
 8 the maintenance schedule, and we will just look at
 9 a document that might be that, {PDR00000046/2}, please.
 10 Does that document look familiar?
 11 A. I don't remember seeing it this, but I may have been,
 12 yeah.
 13 Q. Well, let me see how far we can get with it.
 14 So this shows 12 boxes, one —
 15 A. This is pretty correct. Sorry. Yeah.
 16 Q. If I just give an outline for the transcript.
 17 So 12 boxes, one for each month, and it says
 18 "Standard Maintenance Visit" at the top of each one, and
 19 then for each one there seems to be almost all, except
 20 for month 5, there is an additional bit.
 21 So does that suggest that you do the standard checks
 22 every month and then you do an additional bit of checks?
 23 A. It depends on how you actually work yourself, to be
 24 honest with you. This is a guidance, yeah? I would
 25 work on a sort of three-month rotating basis, motor

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1 room, shaft, pit area, so that I knew that I was
 2 checking everything that needed to be checked on
 3 a regular basis. So, yes, it's pretty much ...
 4 Q. Months 2 and 8 — and I appreciate what you said, that
 5 you're working on a slightly different schedule — that
 6 says "Insurance items" as the additional element.
 7 A. To be honest with you, insurance items, as soon as
 8 you've got the report from the insurance inspector, on
 9 your next visit you would check that against your
 10 maintenance and try and clear as many of those items as
 11 you possibly could without needing parts or having to
 12 quote the client for something.
 13 Q. You pre-empted my next question. I was going to ask
 14 whether you would only check up on those items in those
 15 designated months, but your evidence is you do it as
 16 soon as possible?
 17 A. Yes.
 18 Q. Jumping ahead slightly, at Grenfell Tower, would those
 19 have been thorough inspection of lifts reports by
 20 Bureau Veritas?
 21 A. That would have been, yes, I believe.
 22 Q. Between taking on the contract in April 2017 and the
 23 fire at Grenfell Tower on 14 June of that year, how many
 24 routine maintenance visits did you undertake there?
 25 A. Two.

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1 Q. You have exhibited records of those two visits and we're
 2 going to take them in turn.
 3 The April 2017 visit, please, first, going to
 4 {PDR00000033/2}.
 5 Thank you. If we could just enlarge the top half
 6 for now, thank you very much.
 7 So we can see under "Unit Reference", fourth box on
 8 the left, that's "H090". So that's one of the two lifts
 9 at Grenfell Tower; yes?
 10 A. Yes.
 11 Q. We see the date of the service report on 27 April 2017,
 12 under the "Date of Service Visit Report" box, just under
 13 there.
 14 A. I believe if you go down, the actual date that I did it
 15 was at the bottom.
 16 Q. Yes, if we could scroll down to the bottom, please.
 17 A. The date that that — was at the top there is the date
 18 that that was submitted to the client, I believe.
 19 Q. So we see there 12 April 2017, and that's not your name
 20 there, and we'll deal with that in a second.
 21 A. Yeah.
 22 Q. Can you help us why there is that gap between 12 April
 23 and 27 April?
 24 A. I believe it's an administration thing. We did the
 25 reports, they'd go electronically back to the office,

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1 and then the office would then collate those service
 2 visits and then pass them out to the client
 3 electronically, and that would have been the date that
 4 they would have sent them out to Patrick and his team.
 5 Q. Is that the usual gap between —
 6 A. I couldn't tell you. It was pretty much that throughout
 7 my time up there, yes.
 8 Q. In relation to the name there, A Smart, you explain at
 9 paragraph 13 of your witness statement {PDR00000036/3}
 10 that Mr Smart's name appears there rather than yours
 11 because, having started on the contract, you didn't have
 12 a personal digital assistant at that time?
 13 A. That's correct.
 14 Q. So you prepared what needs to go in the system and then
 15 he inputted the information using his PDA; yes?
 16 A. Or I used his PDA, but it was assigned to him so it came
 17 up with his name.
 18 Q. So my question was going to be: do you recall this
 19 visit? But I think earlier in your evidence you said
 20 this is the one which you've done everything because you
 21 were just getting started.
 22 A. Yes.
 23 Q. Can you tell us a little bit about that, please?
 24 A. Well, when you generally start on a new area, when
 25 you're looking at your list, or me personally, I would

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1 literally look at everything to make sure that
 2 everything was okay, because you can't always rely on
 3 the people before you. So that is how I would do it.
 4 I always make sure that everything is in working order
 5 when I take on a new unit.
 6 Q. Can we go to the top of the page, please, the top half.
 7 So we see there "Works Completed" on the left. So
 8 broadly it seems to be divided in two boxes we see
 9 filled in: "Observations" and "Works Completed". So
 10 those checks you were telling us about, are those the
 11 checks you have identified there?
 12 A. Yes.
 13 Q. So we see car enclosure, emergency alarm system, many
 14 different areas. Is that everything, as far as you're
 15 concerned?
 16 A. Pretty much everything, yes.
 17 Q. We'll come back to this in due course, but noting from
 18 that list that the emergency recall system, the fire
 19 control switch, aren't listed there.
 20 A. No, they're not.
 21 Q. Okay.
 22 "Observations", on the right, there are a number
 23 of — let me ask you about the observations. Are those
 24 matters which are left after your visit still or is that
 25 as you found it when you arrived?

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1 A. That was how it — no, these were actually put on here
 2 by the previous engineer, and reading it, I wouldn't
 3 take them off until the items were actually dealt with.
 4 Q. We see there "Visit Type: M2". So I understand your
 5 evidence that you're not quite sure what M1 versus M2
 6 is. Is M2 something that would have been entered later
 7 on?
 8 A. M2 would just automatically come up on the actual device
 9 itself. That wouldn't be entered by us, that was
 10 already there.
 11 Q. Okay.
 12 So there is an accompanying document called the lift
 13 logbook for this lift, and we're going to go to that
 14 next. It's {MET00039857/3}, please.
 15 Does that look familiar?
 16 A. Yeah.
 17 Q. Can you explain where this document would be kept,
 18 please?
 19 A. In the lift motor room.
 20 Q. At Grenfell Tower?
 21 A. Yes.
 22 Q. So this is for H090, we can see in big letters there.
 23 If we go to the next page {MET00039857/4}, please,
 24 this shows a maintenance schedule, various entries,
 25 there is months on the left side, various checks.

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1 A. Yeah.
 2 Q. And at the top we see dates and initials of people and
 3 ticks; yes?
 4 A. Yes.
 5 Q. There is an entry dated 12 April 2017, which is the
 6 second rightmost column in the schedule, if we could
 7 just zoom in on that bit, please. Thank you very much.
 8 That says "MW"; is that your entry?
 9 A. That's me, yeah.
 10 Q. Yes. It looks a bit like the 4 was written over another
 11 number. Do you know what that was?
 12 A. I think I put the wrong number in first.
 13 Q. Okay. Then we can see underneath a number of boxes
 14 being ticked, and does that correspond to what you said
 15 in the electronic version that you created via the PDA?
 16 A. Yeah, pretty much. Yes.
 17 Q. Thank you.
 18 Can we please now go to {PDR00000035/2}.
 19 This is the other set of exhibits to your witness
 20 statement. This one, as we can see, is the other lift,
 21 91; yes?
 22 A. Yes.
 23 Q. So without going over the same ground about the dates
 24 and so on, it has got the same date of report and the
 25 same, if you were to look at the bottom, 12 April is the

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1 date of the visit.
 2 A. That's correct.
 3 Q. The section on the right, "Observations", has not all,
 4 but many of the same comments as the other lift.
 5 A. That's correct, yeah.
 6 Q. Would those have been left over from the previous
 7 engineer as well?
 8 A. Yes.
 9 Q. We'll just quickly look at the corresponding logbook,
 10 which is {MET00039857/5}, please. Slightly messy there,
 11 but we can —
 12 A. Slightly messy, yes. I did on my — like this is
 13 obviously my first visit to the area. A lot of these
 14 were replaced.
 15 Q. Where it says "Use other card", do you know what that
 16 means, in big letters across the right side?
 17 A. Oh, that must mean that there must have been another log
 18 card.
 19 Q. I see.
 20 Focusing on the maintenance visit on the next page
 21 over, please {MET00039857/6}. Quite similar to what we
 22 saw, the second rightmost column, again, it's got your
 23 initials.
 24 A. Yes.
 25 Q. And that's a 4 as well, I think?

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1 A. It is a 4, yes.
 2 Q. So, again, do you mark off on this schedule the things
 3 you've checked and recorded on the digital version?
 4 A. Pretty much, yes.
 5 Q. If we could go back to page 5 {MET00039857/5}, please,
 6 and looking at right-hand side, if we could zoom in,
 7 please, it's just under the fields that are in the
 8 middle, there is an entry from that date as well,
 9 12/4/17, and it says:
 10 "Looked at safety gear greased up sprayed doors."
 11 And there is three sets of initials, including
 12 yours.
 13 Can you give us a little information, please, about
 14 what this means?
 15 A. I believe I found a problem and that's why I noted it on
 16 there.
 17 Q. Are you able to say what the problem was from —
 18 A. I think there was a loud noise coming from underneath
 19 the car, and that's where the safety gear's located.
 20 Also, the doors were making quite a loud noise as well,
 21 so I used some spray to lubricate them to stop them from
 22 making a noise. So I would have added that on to the
 23 log card as due diligence.
 24 Q. Thank you, that's helpful.
 25 We're going to turn now to your second maintenance

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1 visit .
 2 If we could go to {PDR0000033/3}, please.
 3 This is in relation to lift H090, and dated 31 May,
 4 as we can see there, but at the bottom it's another
 5 entry by Mr Smart dated 9 May 2017.
 6 So the date of the actual visit would have been
 7 9 May; is that right?
 8 A. That's correct.
 9 Q. Do you actually recall this visit ?
 10 A. Not now, no, unfortunately. It's been a long time.
 11 Q. Okay. We'll look at some documents to see if it can
 12 help your recall .
 13 But visit type here isn't M2, it's S. What does S
 14 stand for? This is the left side.
 15 A. Unfortunately I can't tell you that, I don't know.
 16 Q. And ---
 17 A. I can't remember, sorry.
 18 Q. The works completed, again, has quite a long list of
 19 checks. Would those all have been checks that you would
 20 have recorded from that particular visit ?
 21 A. It would be just --- I was still not --- you know, I was
 22 still --- it's only my second visit, so I'm still looking
 23 at everything, in my own --- for my own benefit.
 24 Q. Again, just noting that the fire control switch isn't
 25 recorded there, expressly .

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1 A. No.
 2 Q. The right side of the form, "Observations", it has
 3 effectively the same text as the previous report for
 4 this lift , doesn't it ?
 5 A. Yes, there's nothing been added or taken away.
 6 Q. Does that suggest that, between your first visit and
 7 your second visit , those problems haven't been
 8 addressed?
 9 A. Yes, some of them hadn't been addressed, yeah. Yeah.
 10 I'd say all of them hadn't been addressed.
 11 Q. Would you have expected someone to have come out and
 12 dealt with them or yourself to have dealt with them in
 13 the interim?
 14 A. Well, the seals leaking on the gear is a repair job.
 15 That would have been reported to the office and planned
 16 in as a major --- it's a major job to do, because you've
 17 got to take the lift out of service and you've got to
 18 pull the motor and gearbox apart to replace the seals,
 19 so that would have been something that was being
 20 planned. Basically we just monitor it to make sure that
 21 the oil levels are correct. Yeah, that would have been
 22 a planned repair.
 23 Q. Without going into the detail of everything that's said
 24 there, were any of those issues to do with fire safety
 25 or relevant to fire safety?

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1 A. No.
 2 Q. We'll look at the handwritten records now, which is
 3 {MET00039857/4}, please.
 4 So same form we've seen before, but this time we're
 5 looking at the rightmost column, 9 May 2017. Again,
 6 "MW", your initials; yes?
 7 A. Yes, that is correct .
 8 Q. And then we see the same ticks, I think, or effectively
 9 the same ticks.
 10 A. Yes.
 11 Q. So does that reflect that you ticked what you checked on
 12 that occasion?
 13 A. Yeah, I ticked what I looked at, yes.
 14 Q. Both with this visit and the previous visit , do you
 15 accept that none of these entries --- and you can take it
 16 from me --- on the form refer to the fire control switch?
 17 A. That's correct .
 18 Q. We'll just briefly deal with the other lift for
 19 completeness.
 20 If we can go to {PDR0000035/3}, please. So
 21 a similar entry by Mr Smart at the bottom, same dates as
 22 with the other report; yes?
 23 A. Yeah.
 24 Q. Thank you.
 25 If we could go to the works recorded section on the

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1 left , please. Those are the checks, again, that you ---
 2 A. Yes.
 3 Q. --- carried out?
 4 A. Yes.
 5 Q. Take it from me that they're recorded similarly on the
 6 other handwritten log card, which I don't propose we go
 7 to .
 8 A. Yes.
 9 Q. But you would ---
 10 A. Yes.
 11 Q. --- carry them?
 12 A. Yes.
 13 Q. After the 9 May 2017 visit, when would the next
 14 maintenance visit have been due?
 15 A. June.
 16 Q. When in June?
 17 A. Roughly around about the second week.
 18 Q. In general, what was the prevailing nature of the
 19 maintenance issues at Grenfell Tower, in your
 20 experience?
 21 A. Sorry, can you elaborate?
 22 Q. What were the most common issues in maintaining the
 23 lifts at Grenfell Tower, based on your two months?
 24 A. Not really many, to be honest with you. I mean, we had
 25 a couple of issues with doors, but with a lift , you're

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1 going to always get 90% of your problems with lift
 2 doors, so that was the main thing. I believe
 3 previously, before I went up there, they were having
 4 a lot of problems with them, and all the door hanger
 5 rollers were changed, which actually improved the
 6 reliance of the lifts. So, no, they were working pretty
 7 well.
 8 Q. Related to that, there's a mention of some works which
 9 we haven't quite been able to identify in some minutes
 10 that I'd like you to look at, if that's okay. It's
 11 {MET00039497}.
 12 These are the minutes of a meeting between PDERS and
 13 TMO, the client. You're not recorded as attending then,
 14 so if you're not able to assist, do let us know, but
 15 particularly we're looking at page 2 {MET00039497/2}, at
 16 point 5.0, subpoint 2. This refers to works being
 17 carried out over the weekend, with further works to be
 18 carried out on 9 April.
 19 A. That's correct. I believe that was the actual
 20 replacement of the landing door rollers.
 21 Q. I see. So that's what you were talking about just now?
 22 A. Yes.
 23 Q. Turning to a separate topic now, which is specifically
 24 fire control switches.
 25 How many fire control switches did you observe at

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1 Grenfell Tower?
 2 A. One.
 3 Q. Where was that switch?
 4 A. In the middle, between the two lifts.
 5 Q. And are you certain that was the only switch to be
 6 found?
 7 A. There was a redundant one on the third floor, I believe.
 8 But that was when there was offices there, from what
 9 I can remember, before my time, basically.
 10 Q. We'll turn to look at that other switch, but focusing on
 11 the ground floor operational switch first.
 12 Generally, can you explain the process, please, how
 13 would you test a fire control switch?
 14 A. Basically you would insert the key and you would turn it
 15 so that you can hear it click, and then you would wait
 16 for the lifts to actually come down to the ground floor.
 17 They would both come down, open their doors up. One
 18 will stay as redundant and the other one is for the
 19 Fire Brigade to use.
 20 You get in, you push a floor, you then use the door
 21 close button to close the doors. When you arrive at the
 22 floor, the doors won't open until you press the door
 23 open switch button in the car, and it's a dead man's
 24 switch, so if there is a fire right there in front of
 25 you, if you pull your finger off, the door should close

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1 immediately and then you can get away from that floor.
 2 That's how that works.
 3 Q. We've heard in evidence previously reference to a peep
 4 function; is that --
 5 A. Yeah, basically, yes.
 6 Q. This process you've just detailed, was that based on
 7 some courses you have attended or instructions you were
 8 given?
 9 A. Just general training over the years. As an apprentice,
 10 you're taught these things, so it's just generally,
 11 you know, how we're taught.
 12 Q. Has the basic process you just outlined changed since
 13 you started in the lifts industry?
 14 A. Not really, no.
 15 Q. Is that something that you were very accustomed to
 16 doing, then?
 17 A. Yes, yes.
 18 Q. Earlier we looked at the field service handbook and we
 19 looked at M1 and M2 procedures, and we saw that it
 20 doesn't mention fire control switches there.
 21 A. No.
 22 Q. I'm going to ask to go back to that document, please,
 23 the contents page, at {PDR00000055/2}.
 24 So under section 2 we see annual checks.
 25 A. Yes.

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1 Q. Specifically focusing for the minute on d, "Annual
 2 Electrical and Mechanical Safety Device Check"; do you
 3 see that there?
 4 A. Yes.
 5 Q. Does that sound familiar?
 6 A. Yes.
 7 Q. Let's look at the details of that. Page 95
 8 {PDR00000055/95}, please.
 9 That's the heading, and specifically "Electrical
 10 Safety Device Examination", and then the next one is a
 11 "List of Electrical Safety Devices" --
 12 A. Yes.
 13 Q. -- "(as applicable)".
 14 A. Yes.
 15 Q. There are very many different switches there, most of
 16 which I don't know what they do, but we're only focusing
 17 for now on the fire control switch.
 18 If we turn to page 97 {PDR00000055/97}, please, and
 19 we see "Fireman's switch" in bold --
 20 A. Yes.
 21 Q. -- about two-thirds of the way down:
 22 "Ensure the lift operates as designed when the
 23 switch is operated."
 24 Do you accept that's the only part of the
 25 documentation which refers to a fireman's switch?

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1 A. I believe so, yes.
 2 Q. So we've seen that it's not covered in the monthly
 3 checks or M1 and M2 checks, but it is covered in this
 4 annual electrical and mechanical device check.
 5 A. Yes.
 6 Q. Does that suggest that the fireman's switch is only
 7 tested annually and not monthly?
 8 A. A lot of companies do it annually, some do it
 9 three-monthly, some do it six-monthly. It's also tested
 10 as well every six months by the insurance inspector.
 11 Q. Well --
 12 A. It's not -- I mean, they don't document it, as in you
 13 have to like do this every month. Usually you would
 14 just in case.
 15 Q. Your evidence in your witness statement is that you did
 16 do it twice, during both visits, the routine maintenance
 17 visits that you've done. Where does that practice come
 18 from?
 19 A. That comes from my own training and experience as a lift
 20 engineer.
 21 Q. Thank you.
 22 We'll look at those checks in a bit more detail, but
 23 firstly, going back to this annual check of switches.
 24 According to the service records provided by PDERS
 25 of the monthly checks -- can we go to {PDR00000047/24},

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1 please. So this is an entry, same form as we've seen
 2 before, "Service Visit Report". "Date of Service Visit
 3 Report: 25/02/2016", and if we look at the column on the
 4 left, we can see, second from the bottom in the list of
 5 checks, "Electrical Safety Switch Check".
 6 A. Yes.
 7 Q. Take it from me that's the last reference to that
 8 particular check in between that date and the date of
 9 the fire.
 10 A. Right.
 11 Q. Are you able to assist us, to the best of your
 12 knowledge, was another annual check of these switches
 13 undertaken?
 14 A. Not an annual check, no.
 15 Q. So if this is February 2016, would you have expected
 16 another set of the same checks in around February 2017?
 17 A. No. Oh, sorry, in February 2017, yes.
 18 Q. Are you able to assist us whether that actually
 19 happened?
 20 A. I honestly don't know. It was before I was actually
 21 there, so I can't comment on that.
 22 Q. It's not something that was mentioned in your handover?
 23 A. No. I should imagine it was done, but I can't --
 24 Q. Yes.
 25 A. I can't tell you whether it was or not.

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1 Q. Sticking just to what you're able to --
 2 A. I can't tell you then.
 3 Q. Yes, thank you.
 4 Do you agree that where a fire control switch is
 5 provided, it is a crucial part of the fire safety
 6 equipment?
 7 A. Yes.
 8 Q. Someone picking up a record of your maintenance visit,
 9 for example TMO as PDERS's client, would have no way of
 10 knowing from those records, the two visit records that
 11 we have seen, that you had tested the fire control
 12 switch.
 13 A. No, they wouldn't.
 14 Q. In your --
 15 A. Not without actually going over to see what was done on
 16 the annual inspection.
 17 Q. Yes. Well, for someone to properly understand that the
 18 February 2016 annual inspection involved a check of the
 19 fire control switch --
 20 A. Yes.
 21 Q. -- you would need to have the manual --
 22 A. Yes.
 23 Q. -- that the client wouldn't have, presumably, would it?
 24 A. No.
 25 Q. Paragraph 12 of your witness statement

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1 {PDR00000036/3} -- we don't need to go to it -- you say
 2 that this component, the fire control switch, is not on
 3 the checklist because it's not common to every lift
 4 serviced by PDERS.
 5 Are such switches present in the majority of the
 6 lifts you service?
 7 A. It depends, really. I mean, a fire switch is usually in
 8 a building that doesn't have fire control built into the
 9 lift. A lot of places have fire alarm systems that when
 10 the actual alarm goes off, it will automatically ground
 11 those lifts, and, like I say, not every lift is
 12 a fireman's lift. So it's very hard for them to
 13 distinguish which one is the fire lift and which one
 14 isn't. I believe it's -- I know it's practice now to
 15 actually note down which is which, but it wasn't at the
 16 time.
 17 Q. Just exploring your explanation for why there wasn't
 18 a written record, is it right that the checklist could
 19 include a reference, a box, to fire control switches,
 20 and then if there isn't one in the building, you could
 21 just say N/A, not applicable?
 22 A. Yes.
 23 Q. Alternatively, someone such as yourself could write down
 24 "Fire control switch" in this free text form that we can
 25 see on the left.

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1 A. Yes, yes.
 2 Q. So that would mean, wouldn't it, that it would allow
 3 others to confirm it's been tested?
 4 A. Yes.
 5 Q. And would also mean it's not accidentally omitted on
 6 an inspection, because you can look back.
 7 A. Yes, absolutely.
 8 Q. So do you consider that it was a sound practice not to
 9 record this information?
 10 A. Looking back, I should have actually put it down that
 11 I checked it, but I didn't.
 12 Q. Thank you.
 13 You mentioned earlier the other switch, the defunct
 14 switch, so I'm just going to ask you about that.
 15 At paragraph 21 of your statement {PDR00000036/5} --
 16 we don't need to go to it -- you said you were aware
 17 there was an additional fire control switch on another
 18 floor of Grenfell Tower which had been left following
 19 the refurbishment of 2014.
 20 A. Yes, I was told this by my colleagues.
 21 Q. Did you actually see that switch?
 22 A. I believe I went down to the third floor, yeah.
 23 I don't -- you know, it's a long time ago now to me, but
 24 yes, I believe we did stop at the third floor.
 25 Q. So as you were aware of this switch, did you make any

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1 record or raise any concern about it still being there
 2 in spite of having been disconnected?
 3 A. Only talking to my colleagues, "Why has that not been
 4 blanked off?"
 5 Q. So if you wanted something to actually be done about it,
 6 would the appropriate step to take be to put it in this
 7 document?
 8 A. Not necessarily. It would have been one of the things
 9 that I was probably making notes of or in my head to
 10 speak to Patrick about.
 11 Q. Did you recommend its removal to anyone, whether
 12 PDERS --
 13 A. Not at the time, no.
 14 Q. Do you accept that the presence of another switch could
 15 cause potentially confusion in an emergency situation?
 16 A. It could, but that had been there for a very long time
 17 before I even turned up.
 18 Q. Coming back to the ground floor control switch, did you
 19 ever encounter any problem when testing the fire control
 20 switch at Grenfell Tower?
 21 A. No, I didn't.
 22 Q. Was the process of testing that switch the same as you
 23 described earlier in general terms?
 24 A. Yes.
 25 Q. How long would that particular part of the test of the

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1 two hours per lift take?
 2 A. About five, ten minutes maximum. As long as you weren't
 3 disrupting the flow of people in the building, because
 4 obviously you get a lot of tenants come in and they want
 5 to use the lifts, but you still have to say to them,
 6 "Can you give me five minutes just to check this", and
 7 they was all very helpful and allowed me to do my job.
 8 Q. Thank you.
 9 Paragraph 22 of your witness statement
 10 {PDR00000036/5} -- we don't need to turn it up -- you
 11 say that on each of these two visits, you specifically
 12 remember checking that the fire switch was in good and
 13 proper working order by testing it.
 14 Can you please explain why you say you have this
 15 specific recollection?
 16 A. I say this specific recollection because I actually --
 17 you know, it was my first couple of visits to the actual
 18 site itself, and from what followed the month after, and
 19 I felt happy that I'd actually checked it and I knew it
 20 was working at the time.
 21 Q. Mr Wallis, in answer to my question earlier about
 22 whether you recall the May visit, your answer was to the
 23 effect that your recollection perhaps isn't that good.
 24 How do you reconcile that with the answer you give here?
 25 A. It's basically because of the fire that happened, I know

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1 that I checked that switch.
 2 Q. Do you have a specific recollection, then, as you give
 3 evidence today, of checking the switch in May 2017?
 4 A. It's literally -- yeah, I can remember checking that
 5 switch.
 6 Q. As we've established, given the absence of a written
 7 record, did the TMO or your management or supervisors
 8 ever query whether you were in fact testing the switch
 9 and if it was working?
 10 A. No, they never.
 11 Q. Thank you.
 12 Turning to a different component now, part of the
 13 same system, the drop key, the express drop key.
 14 If we can go to exhibit 4 to your statement, which
 15 is {PDR00000051/2}, please.
 16 The switch we were discussing for the last
 17 ten minutes or so, is that operated by a drop key?
 18 A. Yes.
 19 Q. Is this a picture of the drop key --
 20 A. Yes.
 21 Q. -- that you used to test -- I do apologise again, but if
 22 you could just wait until I've finished --
 23 A. Yes, I'd caught myself, sorry.
 24 Q. Is this the drop key you used to test the fire control
 25 switch at Grenfell Tower?

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1 A. Yes, to my knowledge.
 2 Q. Did you ever use any other key?
 3 A. No.
 4 Q. Where did you obtain the key that you did use?
 5 A. That would have been supplied by PDERS.
 6 Q. Do you remember the manufacturer of the key? It doesn't
 7 seem to show it on that image, as far as I can see?
 8 A. No.
 9 Q. Did you use the same key on both occasions? Is it just
 10 one you carried around with you?
 11 A. It's the one key that I had with me all the time.
 12 Q. Did you ever have any issues in terms of compatibility
 13 of this key with the switch?
 14 A. No.
 15 Q. I'm sorry we're going into such minutiae, but this is
 16 very important: what was your experience of actually
 17 inserting and turning the key? Was it an easy
 18 experience, was there any --
 19 A. You have to be gentle with them. You've got to make
 20 sure that when the key goes in, it actually drops. If
 21 it doesn't drop then you're going to cause damage. So
 22 when you push it in, you hear it click, and you can feel
 23 it -- you can actually feel it -- when you're holding
 24 the end, you can feel it drop, and that's when you know
 25 that it's probably in the right position, and that's

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1 what that roll pin's for, so it's generally in the
 2 correct position to be able to turn.
 3 Q. You say the pin, is that the bit of metal in the middle?
 4 A. Yes.
 5 Q. Does that stop you inserting the key too far?
 6 A. Yes.
 7 Q. You mentioned damage to switches and I'd just like to
 8 talk about that.
 9 Did you ever observe any damage to this fire control
 10 switch?
 11 A. Not at Grenfell Tower, no.
 12 Q. If you had observed any damage to the fire control
 13 switch, can you explain what actions you would have
 14 taken?
 15 A. I would have removed the actual switch and repaired it.
 16 Q. Would that have happened the same day, immediately --
 17 A. Immediately.
 18 Q. Is that a difficult repair to do?
 19 A. Sometimes, sometimes not. It depends on how badly bent
 20 the armature is, so ...
 21 Q. At paragraph 24(h) of your statement {PDR0000036/7} --
 22 we don't need to go to it -- you referred to the fact
 23 you have come across fire switches in other properties
 24 which had damaged internal mechanisms.
 25 A. Yes.

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1 Q. Can we please go to Mr Howkins' expert report,
 2 {RHO00000003/213}.
 3 Zooming in on the second set of pictures toward the
 4 bottom there, please, the picture on the left, the
 5 switch on the left at the bottom picture under
 6 paragraph 557, is the one removed from the ground floor
 7 at Grenfell Tower. The picture on the right in the same
 8 set of pictures is an example switch, so a new switch,
 9 effectively.
 10 A. Yeah.
 11 Q. We see, and Mr Howkins concludes, that the side wards
 12 are bent. Are the side wards those vertical metal
 13 plates?
 14 A. Yes.
 15 Q. Have you seen this kind of damage before?
 16 A. Yes.
 17 Q. At Grenfell Tower or elsewhere?
 18 A. Elsewhere, not at Grenfell.
 19 Q. If the fire control switch had been damaged in this way
 20 when you tested it, so if these sides had been bent,
 21 based on your experience, would you have appreciated
 22 a difference in how it operated, do you think?
 23 A. Yes, I would have, yeah. Well, it wouldn't have been
 24 able to operate. Basically, if I'd have operated it one
 25 way, I wouldn't have been able to turn it back the other

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1 way to put the lifts back into normal operation. So if
 2 it was like that -- it wasn't like that. It worked when
 3 I tested it.
 4 Q. At paragraph 558 of Mr Howkins' report -- we see the
 5 beginning on this page and I'll just read it out:
 6 "The Briefing Note also notes, as noted in the WSP
 7 report, that BJB/74 [so that's the switch from
 8 Grenfell Tower] was jammed. On examination, it appeared
 9 that this jam was caused by a build up of builders'
 10 material. During examination the jam was cleared and
 11 the switch operated correctly. It is not known how or
 12 why the jam occurred."
 13 Do you recall the fire control switch on the ground
 14 floor being jammed with builders' material or debris?
 15 A. No.
 16 Q. If it had been, do you think you could have identified
 17 this?
 18 A. Yes.
 19 Q. Do you think you would likely have identified it?
 20 A. Yes.
 21 Q. What would you expect to experience, if that had been
 22 the case?
 23 A. Really stiff to try and turn the key itself.
 24 Q. If you had been able to turn the key with some
 25 difficulty, but it still worked, what would you have

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1 done?
 2 A. I would have took it off and had a look.
 3 Q. Would anything, in that scenario, have been noted in
 4 your reports?
 5 A. No.
 6 Q. Why not?
 7 A. Because I didn't have any problems with activating the
 8 switch.
 9 SIR MARTIN MOORE--BICK: I wonder if you could go back to the
 10 picture of the switches for a moment, Mr Ustych.
 11 MR USTYCH: Yes.
 12 SIR MARTIN MOORE--BICK: Because I would just like Mr Wallis'
 13 help to understand exactly how this system works.
 14 MR USTYCH: Could we go to the previous page, please
 15 {RHO00000003/213}.
 16 SIR MARTIN MOORE--BICK: We're looking at the switch from the
 17 back, from the inside; is that right?
 18 A. Yes.
 19 SIR MARTIN MOORE--BICK: That large circular aperture at the
 20 top, is that where you put the key in?
 21 A. From the other side, though.
 22 SIR MARTIN MOORE--BICK: Yeah, and you would put it in --
 23 A. The key would go in, yes, and then the end of the key
 24 would drop, and it's got the same shape as the aperture
 25 so that it can fit through there and nobody can just put

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1 anything in there to activate the switch.
 2 SIR MARTIN MOORE--BICK: So where is the switch, as we look
 3 at this box?
 4 A. The two flappy bits on either side.
 5 SIR MARTIN MOORE--BICK: Oh, yes, all right. And there is
 6 a --
 7 A. It's like a rocker.
 8 SIR MARTIN MOORE--BICK: -- space in what are called the side
 9 wards, those are the vertical plates; is that right?
 10 A. Yes.
 11 SIR MARTIN MOORE--BICK: And the piece of the key that's
 12 dropped, which is now hanging vertically --
 13 A. Yes.
 14 SIR MARTIN MOORE--BICK: -- can turn through that aperture --
 15 A. Yes.
 16 SIR MARTIN MOORE--BICK: -- to engage what?
 17 A. Can you see the two bits sticking out either side, one
 18 either side?
 19 SIR MARTIN MOORE--BICK: Oh, yes, all right.
 20 A. It's to rock the switch one way or the other.
 21 SIR MARTIN MOORE--BICK: So you rock it one way, it --
 22 A. Activates it.
 23 SIR MARTIN MOORE--BICK: -- activates it, and you have to
 24 rock it the other way to deactivate it?
 25 A. Yes. Yes, sir.

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1 SIR MARTIN MOORE--BICK: And the damage that we see on the
 2 left-hand one you say can be caused by not using the key
 3 correctly; is that right?
 4 A. Yes.
 5 SIR MARTIN MOORE--BICK: And, what, the key has been pushed
 6 too far towards the back of the box or --
 7 A. I believe, yeah.
 8 SIR MARTIN MOORE--BICK: -- from the other side, and so
 9 instead of the vertical piece passing through the
 10 aperture, it's now engaging the side ward; is that
 11 right?
 12 A. That's correct, yes.
 13 SIR MARTIN MOORE--BICK: And pushing it out of line?
 14 A. Yes.
 15 SIR MARTIN MOORE--BICK: I see. Yes.
 16 Yes, that's very helpful, thank you very much.
 17 A. Thank you.
 18 MR USTYCH: Thank you, Mr Chairman, that's very helpful.
 19 So going back to my last question, I think we might
 20 have been at cross-purposes. In a scenario where you
 21 had to take off the switch to clear it of debris and put
 22 it back on, would you note that on the report?
 23 A. That would be on the report, if it was -- yeah, if
 24 that's what I found, yes.
 25 Q. Looking now at an email following the fire at

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1 {TMO10023305}, please, and zooming in on the bottom
 2 half, please.
 3 This is an email from Philip Edwards, who was your
 4 former colleague at PDERS. Was he a supervisor or
 5 manager at PDERS?
 6 A. He was a manager.
 7 Q. Manager.
 8 A. Yeah.
 9 Q. And this is to Patrick Barrett, whom you mentioned
 10 earlier :
 11 "Hi Pat,
 12 "Confirmed today in previous email:
 13 "Fireman's switch at ground floor to both units.
 14 Lift were homing to ground only (Fire recall). No
 15 central fire alarm so the recall would not ground
 16 automatically'."
 17 That's in quotation marks, and under that:
 18 "These switches are checked on the service visit .
 19 Mark Wallis the regular service engineer since
 20 April 2017 has confirmed both switche[s] were in
 21 a working capability with no faults as per above
 22 statement."
 23 A. Yeah, I don't know what he means by both, it was just
 24 the one switch.
 25 Q. Did Philip Edwards discuss your maintenance of the

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1 switches in June 2017 with you?
 2 A. He asked me whether I'd checked them, yes.
 3 Q. And your response, is that represented by the paragraph
 4 I just read out?
 5 A. Yes, that I actually checked them, yes.
 6 Q. On the issue of supervision, I would like to ask you
 7 a few questions about how your work was supervised
 8 internally.
 9 You say at paragraph 28 of your statement
 10 {PDR00000036/8}, which we don't need to turn up, that
 11 you remember that Mr Edwards had accompanied you on one
 12 of your regular maintenance visits to Grenfell Tower
 13 before the fire.
 14 A. I believe I met him there, yeah.
 15 Q. The Inquiry has obtained a statement from Mr Edwards
 16 which we can turn up at {PDR00000054/7}, please,
 17 paragraph 32.
 18 To summarise -- in fact, please do take a minute
 19 just to read that paragraph.
 20 (Pause)
 21 A. I may be mistaken, it may have been Dave Watkins that
 22 met me.
 23 Q. Okay.
 24 At paragraph 30 of your statement {PDR00000036/9},
 25 which we don't need to go to, you describe having weekly

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1 meetings with Patrick Barrett from TMO and monthly
 2 meetings with Dave Watkins and Phil Edwards coming too;
 3 yes?
 4 A. Yes.
 5 Q. If we go to the minutes or notes of such a meeting,
 6 {MET00037641}, please.
 7 That's titled "Directors Meeting Task List",
 8 "Kensington & Chelsea TMO". So you weren't a director,
 9 as I understand, so you wouldn't be attending these
 10 meetings; is that right?
 11 A. No.
 12 Q. I would like to ask you to the best of your ability to
 13 help us whether some of the issues described here sound
 14 familiar.
 15 The document suggests, if we look at the text in
 16 blue, next to number 1:
 17 "PDERS response time to breakdown calls needs
 18 immediate improvement (especially in the out of normal
 19 working hours periods) as we are not always achieving
 20 the agreed 4 hours, let alone the contractual 2 hour
 21 requirement."
 22 Does that concern sound familiar?
 23 A. That concerned me, yeah. As the lead engineer, we was
 24 trying to meet our targets with our client, and we were
 25 working really hard up there to make sure this was

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1 happening, but it was the out of hours that was letting
 2 us down.
 3 Q. In fairness, the text highlighted in yellow, just
 4 reading the first sentence:
 5 "Mark Wallis and Antony Smart do not understand why
 6 we have a poor in hours response, as they advise they
 7 are always inside 2 hours from the time they receive the
 8 call."
 9 So that refers to in-hours response.
 10 A. Yes, we believe it was a delay between the call being
 11 phoned in to the office and then that being relayed to
 12 us. A lot of the time they weren't actually phoning us
 13 directly, they were sending it straight to the PDA, and
 14 if you were out of signal, you weren't getting it, so
 15 you wouldn't pick it up until you came back into signal
 16 again, and the PDA wasn't as reliable as the phone.
 17 Q. And the next point, point 2, again in blue,
 18 "Grenfield Tower", is it fair to assume you didn't have
 19 a Grenfield Tower on your route, it must be
 20 Grenfell Tower; yes?
 21 A. I believe that's -- yes.
 22 Q. "... experienced an extremely long wait for replacement
 23 parts."
 24 Is that a concern you were aware of?
 25 A. I believe that is relating to the landing door rollers

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1 that we discussed previously, which were completed
 2 before I actually took over the job.
 3 Q. Okay.
 4 Overall, in your two months doing that job, were
 5 there issues between PDERS and TMO in terms of the
 6 standard of service provided to the contract?
 7 A. They were happy with what we were doing, but I believe
 8 it was more along the communication between the two,
 9 which I endeavoured to resolve, being the lead engineer.
 10 Q. Very briefly, what steps did PDERS and you in particular
 11 take to resolve these issues?
 12 A. Made sure that the meetings were attended regularly,
 13 lots of communication between myself and
 14 Patrick Barrett. Where he wasn't happy, I would address
 15 the issues that he was bringing to me. I was also given
 16 a lot of support from my team and the office itself,
 17 from Dave Watkins and Phil Edwards.
 18 Q. Thank you.
 19 Moving on to a different topic very briefly, you
 20 mentioned that some buildings have an automatic recall
 21 system as part of the fire control system. As far as
 22 you were aware, this building didn't have it when you --
 23 A. As far as I'm aware, it didn't have it.
 24 Q. The Inquiry has heard evidence that there was
 25 an automatic fire recall system installed in around

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1 2005. Do you know what happened to that system? Do you
2 have any information?
3 A. I have no idea because I never see it actually tested or
4 worked, so I can't comment on that.
5 Q. Just some questions now about the — so we discussed in
6 detail the maintenance visits, now to get an idea of the
7 problems that people called PDERS about. We'll talk
8 about some response service visits.
9 Can you explain what a response visit is? Is it
10 just someone reporting a problem?
11 A. A response visit, probably a call-out for a problem with
12 the lift that we had to go and have a look at it.
13 Q. Okay. If we could look at some examples,
14 {PDR00000045/92}, please.
15 We see a different heading, repair visit rather than
16 maintenance. It's dated 16 May 2017 relating to — at
17 the bottom, the bottom field shows it's the same day
18 again, Mr Smart. Was this visit attended by yourself
19 and entered on his PDA?
20 A. I can't remember this.
21 Q. I see.
22 If we go up to the first half of the document, if
23 you read that text there, does that help your memory at
24 all?
25 A. I mean, me and Tony may have been together at that

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1 point. I don't remember this, this call-out.
2 Q. Okay, thank you.
3 We'll look at another report, then. This one was
4 lift 91. We'll look at one from 90, which is at
5 {PDR00000032/2}, please. This relates to a call-out on
6 5 June 2017.
7 So does this one look familiar?
8 A. I believe so, yes.
9 Q. Are you able to very briefly assist us with what the
10 problem was and how it was resolved?
11 A. I believe the car gate wasn't mating, which is the
12 safety switch on your car doors. So if the doors come
13 across and it doesn't mate correctly, the lift will not
14 engage and move away, and basically it probably needed
15 adjustment, a slight adjustment.
16 Q. Would you have left the lift in service?
17 A. Yes.
18 Q. Just one more document, please, which is at the same
19 document, page 3 {PDR00000032/3}, please.
20 So that's 7 June, same lift, number 90 again, and
21 again, does this one look familiar?
22 A. This does look familiar, yes.
23 Q. Can you again explain, please, what the fault was and
24 how it was resolved?
25 A. I believe the landing doors had had a slight knock.

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1 I don't know how it happened, but it was preventing the
2 door from actually coming across properly to engage the
3 actual landing lock, and it was slightly out of
4 alignment with the smoke prevention device on the back
5 of the lift doors.
6 Q. So there is a reference there to a smoke baffle.
7 A. Yeah, it's like a piece of metal, and it's just to try
8 and slow down the ingress of smoke into the shaft, and
9 it's got like a lip on it, and if the door doesn't line
10 up with it correctly, then it won't allow the door to
11 move freely, so we had to adjust the landing door
12 slightly to make — help that engage properly.
13 Q. We've heard the term smoke fillet before, is it the
14 same —
15 A. Same thing.
16 Q. — device?
17 A. People use different terminologies in our game,
18 unfortunately.
19 Q. Was it unusual that in June 2017 you had to attend two
20 call-outs for the same lift?
21 A. Not really, because I'd only done, you know, a couple of
22 service visits anyway, so I was getting around to giving
23 them more reliability anyway. But two call-outs isn't
24 rare.
25 MR USTYCH: Thank you.

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1 Mr Chairman, those are all the prepared questions
2 I have.
3 SIR MARTIN MOORE-BICK: Right, thank you.
4 Well, Mr Wallis, when counsel says he has got to the
5 end of his questions, we always have a short break to
6 enable him to check that he hasn't left anything out.
7 THE WITNESS: Yes.
8 SIR MARTIN MOORE-BICK: And also to allow other people who
9 are following the proceedings from elsewhere to suggest
10 questions that they think perhaps we should put to you.
11 So we're going to have a break for ten minutes now
12 until 3.15.
13 THE WITNESS: Yes.
14 SIR MARTIN MOORE-BICK: And then when you come back, we'll
15 see if there are any more questions we need to ask you.
16 THE WITNESS: Okay, thank you, sir.
17 SIR MARTIN MOORE-BICK: While you're out of the room, please
18 don't talk to anyone about your evidence. I don't
19 actually think you'll have much chance to, but anyway
20 don't.
21 If you would like to go with the usher, we'll see
22 you in ten minutes.
23 THE WITNESS: Thank you very much.
24 (Pause)
25 SIR MARTIN MOORE-BICK: Right, Mr Ustych. 3.15, then.

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1 MR USTYCH: Thank you, Mr Chairman.
 2 SIR MARTIN MOORE–BICK: Thank you.
 3 (3.05 pm)
 4 (A short break)
 5 (3.15 pm)
 6 SIR MARTIN MOORE–BICK: Right, Mr Wallis, well, let's see if
 7 there are any more questions for you.
 8 Yes, Mr Ustych.
 9 MR USTYCH: Just a few more questions, please, Mr Wallis.
 10 You referred in your evidence to some works carried
 11 out in early April or the weekend of further works on
 12 9 April, and you described them as actual replacement of
 13 the landing door rollers; yes?
 14 A. That's what I believe, yes.
 15 Q. Would these works have affected the operation of the
 16 fire control switch?
 17 A. No, it's mechanical, it's the actual lift doors
 18 themselves, nothing to do with the switch.
 19 Q. Could those works have resulted in any debris coming
 20 into the switch?
 21 A. Not as far as I'm aware.
 22 Q. Should that switch have been cleaned, checked and tested
 23 as part of concluding that work in April?
 24 A. Not as far as I'm aware, no, they wouldn't. Because
 25 they wouldn't have touched it, they wouldn't have done

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1 anything to it, no.
 2 Q. Your evidence, as I understand it, is that you
 3 specifically recall testing the switch again in May;
 4 yes?
 5 A. Yes.
 6 MR USTYCH: Thank you, that's all the questions I have, save
 7 to say thank you very much for coming and assisting us
 8 today, Mr Wallis.
 9 THE WITNESS: Thank you very much.
 10 SIR MARTIN MOORE–BICK: Well, Mr Wallis, I certainly should
 11 thank you on behalf of all the members of the panel for
 12 coming along to give us your evidence. It hasn't taken
 13 all that long but it has, I'm afraid, interfered with
 14 your day quite a bit. We are very grateful to you for
 15 coming along because you have been talking about some
 16 really important things for us.
 17 THE WITNESS: Thank you very much.
 18 SIR MARTIN MOORE–BICK: So thank you very much for coming,
 19 and now you're free to go.
 20 THE WITNESS: Thank you very much.
 21 SIR MARTIN MOORE–BICK: Thank you.
 22 (The witness withdrew)
 23 SIR MARTIN MOORE–BICK: Yes, Mr Ustych. Well, now, is there
 24 anyone else today?
 25 MR USTYCH: Not today, Mr Chairman, thank you.

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1 SIR MARTIN MOORE–BICK: No, all right.
 2 Well, in that case, we'll break at that point and
 3 we'll resume at 10 o'clock tomorrow morning.
 4 MR USTYCH: Thank you.
 5 SIR MARTIN MOORE–BICK: All right? Good. Thank you very
 6 much. 10 o'clock tomorrow, please.
 7 (3.20 pm)
 8 (The hearing adjourned until 10 am
 9 on Tuesday, 20 July 2021)

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