

OPUS 2

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Grenfell Tower Inquiry

Day 26

July 23, 2020

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1 Thursday, 23 July 2020
 2 (10.00 am)
 3 SIR MARTIN MOORE-BICK: Good morning, everyone. Welcome to
 4 today's hearing.
 5 Today we're going to hear evidence from
 6 Mr Simon O'Connor, who for a time was Rydon's project
 7 manager for the refurbishment of Grenfell Tower.
 8 Following an application made to me last year,
 9 I directed that Mr O'Connor should not be visible while
 10 he gives his evidence, although his voice will be heard
 11 in the usual way.
 12 When he replies to questions, therefore, those
 13 watching on the live stream will see only the plain blue
 14 background with the Inquiry logo.
 15 Yes, Mr Millett.
 16 MR MILLETT: Good morning, Mr Chairman. I now call
 17 Mr Simon O'Connor, please.
 18 MR SIMON O'CONNOR (affirmed)
 19 SIR MARTIN MOORE-BICK: Thank you very much, Mr O'Connor.
 20 Sit down and make yourself comfortable.
 21 All right?
 22 THE WITNESS: Yep.
 23 SIR MARTIN MOORE-BICK: Yes, Mr Millett.
 24 Questions from COUNSEL TO THE INQUIRY
 25 MR MILLETT: Mr Chairman, thank you.

1

1 Mr O'Connor, good morning. Can I start by saying
 2 thank you to you for attending today to give evidence to
 3 the Inquiry. We very much appreciate it.
 4 If you have any difficulty understanding any of my
 5 questions, then I will rephrase them if you ask me to do
 6 that, or ask the question in a different way.
 7 If you feel you need a break at any point, please
 8 just tell us and we can take a short break.
 9 Can I also just ask you, please, to keep your voice
 10 up for the transcriber who sits to your right so that
 11 she can get down into the transcript what you are saying
 12 very clearly.
 13 A. Okay.
 14 Q. Also, just one other tip on that score: a nod or a shake
 15 of the head doesn't go on to the transcript, so you have
 16 to say "yes" or "no", if that's your answer.
 17 A. Okay.
 18 Q. You have made one witness statement dated
 19 28 September 2018. It's on the desk in front of you, to
 20 your left there, but it will appear on the screen as
 21 well. It is at {RYD00094221}.
 22 Is that your witness statement?
 23 A. It is.
 24 Q. Can I ask you to turn to page 12 {RYD00094221/12},
 25 please. Is that your signature?

2

1 A. It is.
 2 Q. Have you read this witness statement recently?
 3 A. Yes.
 4 Q. Are its contents true?
 5 A. Yes.
 6 Q. Have you discussed your evidence that you are going to
 7 give today with anybody else before coming here to give
 8 evidence?
 9 A. No.
 10 Q. Thank you.
 11 I am going to start with a few questions relating to
 12 your experience and your background before moving to ask
 13 you some detailed questions in relation to your
 14 involvement in the Grenfell Tower project. All right?
 15 So far as your background is concerned, starting
 16 with that, we can see from your statement that you
 17 worked for Rydon between September 2002 and
 18 September 2015.
 19 A. I did.
 20 Q. During that time, I think you worked your way up from
 21 foreman to site manager, and then took on some project
 22 management roles; is that right?
 23 A. Yes.
 24 Q. I think one example you give is the Chalcots Estate
 25 project in Camden in North London.

3

1 A. Yeah.
 2 Q. You also had been employed as a site manager on the
 3 St George's Estate project with Rydon immediately before
 4 moving on to the Grenfell Tower project.
 5 A. I was, yes.
 6 Q. Yes.
 7 Was the St George's Estate project an external
 8 refurbishment?
 9 A. It was, but not with any cladding.
 10 Q. But it included, I think, three high-rise blocks?
 11 A. It did.
 12 Q. You were involved at the Chalcots, as you said. Were
 13 you site manager at the Chalcots Estate?
 14 A. One of many, yes.
 15 Q. How many?
 16 A. I think there must have been seven, maybe eight.
 17 Q. Right.
 18 Now, the Chalcots Estate was also a high-rise
 19 project, wasn't it?
 20 A. It was.
 21 Q. And that also did include or involve the fitting of
 22 overcladding to the exterior of those blocks.
 23 A. It did.
 24 Q. Specifically, I think, it did involve fitting ACM
 25 cladding; yes?

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1 A. I believe so now; I wouldn't have been aware then.
 2 I was nothing to do with the cladding.
 3 Q. Right.
 4 From your start on the Grenfell Tower refurbishment
 5 project in May 2014, were you occupied exclusively on
 6 that project until August 2015?
 7 A. I believe so.
 8 Q. Right.
 9 Can I ask you to look at your statement,
 10 {RYD00094221/7}. I would like to look at paragraph 14
 11 with you, please. You say there:
 12 "There were design team meetings throughout my time
 13 working on the project. I would be present for most of
 14 these meetings, but not all of them, so that I was aware
 15 of any discussions taking place from a logistics,
 16 programming and progress perspective and so that, as
 17 Project Manager, I could make sure things were happening
 18 at the right time on site. There were deadlines for the
 19 different stages of the project and I needed to know if
 20 a design decision was going to affect a deadline.
 21 Drawings would go through various revisions. I was
 22 aware of this from the design team meetings. Once the
 23 drawings were marked 'approved for construction'
 24 arrangements would be made for that work to go ahead.
 25 It is at this stage that I would get involved because

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1 I needed to coordinate the works now that the drawings
 2 had been approved."
 3 So can we take it from that, Mr O'Connor, that you
 4 were aware of all design decisions?
 5 A. Not all design decisions, no. Like I said, I didn't go
 6 to all the meetings. I was purely there from
 7 a logistics and sequencing point of view.
 8 Q. Right. But you didn't make any design decisions
 9 yourself, did you?
 10 A. Absolutely not, no.
 11 Q. You say -- and it's a passage I read to you -- "It is at
 12 this stage that I would get involved". That's once the
 13 drawings were marked, "Approved for construction".
 14 A. Yes.
 15 Q. Then if you look at the start of paragraph 15, you say:
 16 "I had seen the drawings for the exterior
 17 modifications but I would not have considered any other
 18 information about the components being used (for
 19 example, from the manufacturers). I was focused on when
 20 the materials or components would be arriving on site
 21 from a logistics and programming perspective. I was not
 22 involved in the design or selection of materials for the
 23 works to the exterior of the building, including the
 24 rainscreen cladding panels and the insulation."
 25 Now, in the light of what you say there,

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1 Mr O'Connor, is it fair to say that you consider your
 2 active role only really started after the design had
 3 been approved for construction?
 4 A. Yes, I mean, when I joined the project, from memory
 5 I believe the materials had already been chosen. There
 6 was only some confusion regarding face-fixing or
 7 cassette and some colours.
 8 Q. Yes.
 9 Just examining a little bit further your involvement
 10 in what you did with the designs, is it right that what
 11 you did in practice, in general terms, was to take the
 12 finalised drawings which you got stamped "Approved for
 13 construction" as the basis for you to co-ordinate the
 14 work, so that the project ran on time and to budget?
 15 A. On time, yes.
 16 Q. Right. But not to budget?
 17 A. I wasn't in control of the budget.
 18 Q. Right. Did you have any role or input in relation to
 19 setting the budget or sticking to the budget?
 20 A. No, not really. That was the surveyors' team job.
 21 Q. Right.
 22 Now, the finalised designs took the form, I think
 23 you're telling us, of "Approved for construction"
 24 drawings, drawings which had "Approved for construction"
 25 stamped on them. Is that right?

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1 A. That's what I recall, yes.
 2 Q. Is it right that you wouldn't see any drawings which
 3 didn't have that stamp on them?
 4 A. No, I would see drawings move backwards and forwards,
 5 during -- copied in to emails, but I wouldn't be
 6 commenting on them. I would just know if a drawing had
 7 gone off from, say, Studio E to Harleys, it might come
 8 back with a comment on it.
 9 Q. Right.
 10 A. I wouldn't particularly look at them in depth until
 11 I was actually given them to construct.
 12 Q. Can you help us with this: did you see any drawings to
 13 the best of your recollection which came from Harleys
 14 marked "Approved for construction" before they had been
 15 seen by Studio E?
 16 A. I don't recall. At the time, I don't recall.
 17 Q. Okay.
 18 When you received drawings marked "Approved for
 19 construction", did you take any steps yourself to check
 20 whether the designs complied with Rydon's contractual
 21 requirements?
 22 A. I wasn't qualified to do so.
 23 Q. Were you aware, even in general terms, of Rydon's
 24 contractual requirements and obligations?
 25 A. Not really, no.

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1 Q. Not really .
 2 A. No, sorry, no.
 3 Q. That's very fair to take out the qualification .
 4 Did Mr Lawrence ever give you any kind of
 5 instruction or briefing as to, even in outline, what the
 6 contents of Rydon's obligations to the TMO were?
 7 A. What, contractual obligations?
 8 Q. Contractual obligations .
 9 A. No.
 10 Q. Did he ever give you any briefing or outline instruction
 11 as to what any subcontractors' obligations were to
 12 Rydon?
 13 A. Not that I recall , no.
 14 Q. No.
 15 Does it follow that you didn't take any steps
 16 yourself to check whether the designs complied with the
 17 Building Regulations?
 18 A. Yes.
 19 Q. Yes, you did or yes, you didn't?
 20 A. No, I didn't, no. I was saying yes to your ...
 21 Q. Okay.
 22 When you saw drawings "Approved for construction",
 23 so far as you understood it, Mr O'Connor, who had
 24 approved those drawings?
 25 A. The architects , the specialists who we employed.

1 You know, there was a number of designers and
 2 specialists , ie architects , that had been trained to do
 3 this kind of thing.
 4 Q. When you received information about which materials were
 5 being ordered to site or delivered to site , where did
 6 that information tend generally to come from?
 7 A. Sorry, can you ask the question again?
 8 Q. Yes, let me try it a different way.
 9 When materials were ordered to come to site , were
 10 you responsible primarily for ordering them on to site
 11 as the project manager?
 12 A. No, it would have been a supply package, so the
 13 subcontractor would order their own materials and they
 14 would book them in through the gatemen at the front .
 15 Q. As the occupant of the role of project manager
 16 throughout this period, did you have any role in the
 17 selection of materials to go into the refurbishment?
 18 A. No.
 19 Q. No.
 20 Can I ask you to look at a document, please,
 21 {SEA00000189}. This is an email from Simon Lawrence to
 22 John Hoban of RBKC Building Control dated
 23 3 September 2014, and I would like you to look at the
 24 sentence starting at the end of the first line .
 25 You can see that you're copied in to this email, as

1 is Neil Crawford and Bruce Sounes, both from Studio E.
 2 In the second sentence, beginning at the end of the
 3 first line , Mr Lawrence says to Mr Hoban:
 4 "I understand that you dropped into our site office
 5 recently and had a brief introduction to the project and
 6 drawings from our Project Manager, Simon O'Connor."
 7 Do you remember having a discussion with Mr Hoban at
 8 about this time?
 9 A. I don't, but there's a good chance that he would have
 10 come in just to introduce himself so I could put a face
 11 to a name.
 12 Q. Mr Lawrence says that he had had "a brief introduction
 13 to the project and drawings from our Project Manager,
 14 Simon O'Connor".
 15 Do you remember introducing Mr Hoban to the
 16 drawings?
 17 A. I don't.
 18 Q. So you can't help me about which drawings you showed
 19 him?
 20 A. I can't.
 21 Q. Do you remember asking Mr Hoban or having any kind of
 22 discussion with him at this time, whether at this
 23 meeting or around this time, whether the details of
 24 those drawings were compliant with the
 25 Building Regulations?

1 A. No, I wouldn't have had that conversation.
 2 Q. You say you wouldn't have had that conversation?
 3 A. No.
 4 Q. Does that tell us that you weren't in the position to
 5 have that conversation, or that you don't recall having
 6 it?
 7 A. I don't think I would have been in a position to have
 8 that conversation with a Building Control officer .
 9 Q. Right.
 10 Did you, in general terms, ever have any
 11 conversations with John Hoban or anybody else from RBKC?
 12 A. Regarding?
 13 Q. Well, in relation to anything in relation to this
 14 project . Do you remember any conversations with
 15 John Hoban of RBKC?
 16 A. Not particularly , no, not ones that stand out.
 17 Q. Okay. We will come back and look at that perhaps in
 18 more detail later on.
 19 Can I go back to your witness statement,
 20 {RYD00094221/8}, please, at the top of the page, and
 21 let's look together at paragraph 15.
 22 You say there:
 23 "I know now, although I did not know at the time of
 24 my involvement in the project, that the types of
 25 materials used in the modifications to the exterior of

1 the building were very commonly used. I do not know why
2 certain materials may have been chosen. My role as
3 Project Manager did not involve deciding if materials
4 were fit for purpose."

5 You know now, I think, that the materials used in
6 the exterior modifications at Grenfell were very
7 commonly used, that's what you say.

8 A. Yes.

9 Q. Does that include specifically the insulation?

10 A. I think all of the materials were fairly commonplace.

11 Q. All of them, so insulation and the rainscreen cladding?

12 A. Yes.

13 Q. But you didn't know that at the time?

14 A. No, this was my first cladding project.

15 Q. Now, you told us earlier that you had worked on
16 Chalcots. Had you worked on Ferrier Point?

17 A. No.

18 Q. But you worked at Chalcots.

19 Is it right that, even by 2014/15, and your
20 involvement on the Grenfell Tower refurbishment project,
21 you did not know at that time whether the materials used
22 on Grenfell were commonly used?

23 A. I didn't know, no.

24 Q. Did you ever think about it at the time?

25 A. Not really, that wasn't my role. I mean, there was

13

1 a number of people around me, the designers and
2 architects and -- you know, that specify this stuff day
3 in, day out. I'm not qualified to do that.

4 Q. Can we take it from that that you never asked any
5 questions or familiarised yourself with the detailed
6 properties of, for example, aluminium composite
7 rainscreen cladding?

8 A. No.

9 Q. Right.

10 Is this right: that at no stage of your career,
11 actually, before the Grenfell Tower fire, did you think,
12 "I wonder what this material is"?

13 A. Honestly, no.

14 Q. Right. It would therefore follow, I suppose -- is this
15 right? -- that you never thought to yourself, "I wonder
16 if this is safe"?

17 A. I saw conversations regarding, you know, building regs
18 and stuff like that between Studio E and Harleys and
19 different parties. I just presumed they had all covered
20 that base, bearing in mind they're the specialists.

21 Q. Yes.

22 Now, can I ask you to turn to {RYD00094208}, and
23 what I'm going to do, Mr O'Connor, is to show you part
24 of a witness statement of Alan Grint.

25 Before I do, can you confirm that Alan Grint was

14

1 a site manager employed by Rydon on the Grenfell Tower
2 refurbishment project?

3 A. Yes.

4 Q. He was.

5 Can we look at page 2 {RYD00094208/2}, please,
6 paragraph 8. You can see there at the top of the page
7 he says:

8 "As a site manager my main role was to ensure the
9 work was carried out by the sub-contractors in
10 accordance with the programme of works. My instructions
11 came from Simon O'Connor."

12 Pausing there and looking at the bottom of the page
13 at paragraph 16, I just want to focus with you on the
14 last sentence there. He says:

15 "If Building Control were on site during my time on
16 the project I think Simon O'Connor would have dealt with
17 them."

18 First, do you agree that your role included the
19 management and instruction of the site managers on site
20 employed by Rydon on this project?

21 A. Yes.

22 Q. Is it fair to say that an important part of that role
23 was the provision of design information to these site
24 managers so that they could co-ordinate the works taking
25 place on site?

15

1 A. Yes.

2 Q. And also, is it right that that role would include
3 ensuring the quality of workmanship?

4 A. Not just solely me, no. I mean, I wouldn't be up
5 looking at everything myself because it was a big
6 project and there was a number of managers. That
7 responsibility would be passed on to the likes of Alan
8 and they would be given the correct paperwork to be able
9 to do that.

10 Q. You say there were a number of managers; were there
11 a number of project managers in the same position as you
12 on this project?

13 A. No.

14 Q. Right. So when you say there were a number of managers,
15 what are you referring to?

16 A. Site managers.

17 Q. Oh, I see, site managers, okay.

18 Just to press you a little bit on the question, is
19 it not right that your role was to ensure the quality of
20 workmanship, even if there were site managers themselves
21 who were watching the workers?

22 A. Not entirely my role, no. I mean, I would oversee the
23 site managers, so I suppose in reality it would fall to
24 my remit, but I can't be everywhere always, so I am
25 reliant on their professional opinions as well.

16

1 Q. Indeed. But did you see your job as monitoring and
 2 supervising them so far as the quality of workmanship is
 3 concerned?
 4 A. Yeah.
 5 Q. Yes. And the ultimate purpose of you supervising that
 6 exercise was to ensure that the project ran on time?
 7 A. Yes.
 8 Q. And in accordance with the approved designs?
 9 A. Yes. In accordance with approved drawings, yeah.
 10 Q. Yes.
 11 So did you have conversations or give instructions
 12 to your site managers on site when you looked at the
 13 drawings together, pointed parts out and gave them
 14 instructions as to how to go about constructing what the
 15 drawings said should be constructed?
 16 A. We had specialist subcontractors to do that. I would
 17 give the drawings to the managers and ask if they had
 18 any comments on it, and then we would generally
 19 beforehand probably sit down with the subcontractor as
 20 well.
 21 Q. Yes.
 22 Is Mr Grint correct in paragraph 16 when he says
 23 that if Building Control were on site, Simon O'Connor
 24 would have dealt with them?
 25 A. I would have welcomed them on to site and probably done

17

1 the making of tea and, you know, just chewing the fat
 2 for a minute, and then he would have gone out with the
 3 relevant managers, ie he used to go on the mast climbers
 4 with other managers to look at various things.
 5 I wouldn't have gone always.
 6 Q. I see. When you say other managers, you mean other site
 7 managers?
 8 A. Yeah.
 9 Q. The site managers you were responsible for supervising?
 10 A. Yes.
 11 Q. You say, "I wouldn't have gone always"; did you ever go?
 12 A. I would go out on occasion, yeah.
 13 Q. When you did go on those occasions, did you have
 14 detailed conversations with the Building Control
 15 officer?
 16 A. Not detailed, we was just walking around, looking at the
 17 progress. I would generally go internally if I was
 18 going to go, I wouldn't go up in a mast climber because
 19 it just takes too much time out of my day to do that,
 20 and that's why the managers are there.
 21 Q. I see, okay.
 22 On those occasions, do you remember ever having any
 23 discussion or conversation with Mr Hoban about whether
 24 or not what he was looking at complied with the
 25 Building Regulations?

18

1 A. No.
 2 Q. Can I then go to a document, {ART00002087}. This is the
 3 tender documentation submitted by Rydon for the
 4 Grenfell Tower project dated 13 February 2014.
 5 First of all, do you remember ever seeing this
 6 document at the time?
 7 A. No, I think this is the first time I've seen it.
 8 Q. Let's take it quickly, then. Let's go to page 36
 9 {ART00002087/36}, which is a version of your CV.
 10 A. Yeah.
 11 Q. It sits within the tender documentation.
 12 Did you compile this CV?
 13 A. No.
 14 Q. Did you have any input into its compilation?
 15 A. This would have been someone like the bid writers or
 16 marketing team, not --
 17 Q. I see.
 18 A. -- me.
 19 Q. Okay.
 20 If you look at the top right-hand side, "Role within
 21 the Team", it says:
 22 "Simon is responsible for managing the smooth
 23 delivery of the project. He is responsible for all
 24 operations on site, including; delivery to programme and
 25 budget; co-ordinating design; and management of

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1 subcontractors."
 2 Do you see that?
 3 A. Yep.
 4 Q. Do you agree with that summary of your role?
 5 A. No, I don't.
 6 Q. Which parts do you not agree with?
 7 A. Co-ordinating design.
 8 Q. Right. How is that wrong?
 9 A. Because I wouldn't be qualified to co-ordinate
 10 designers, and I wouldn't know where to start.
 11 Q. Did nobody from Rydon ask you to approve this CV before
 12 it was put in the tender documentation?
 13 A. I never saw the tender documentation.
 14 Q. Right.
 15 A. This was -- these CVs were built up of sort of,
 16 you know, back -- jobs you had done in the past.
 17 Q. Right.
 18 Let's look and see what else it says. It says:
 19 "Simon produces the works programme ..."
 20 Is that correct?
 21 A. Yes.
 22 Q. "... and is responsible for compiling the health and
 23 safety plans for client approval ..."
 24 Is that correct?
 25 A. The health and safety file, yeah, construction phase

20

1 health and safety plan, yes.
 2 Q. And managing health and safety on site?
 3 A. Yes.
 4 Q. Then it sets out the qualifications you have there. I'm
 5 going to assume they're correct unless you tell me
 6 otherwise.
 7 A. I didn't complete the HNC.
 8 Q. Right. Okay. Then "Benefits to the Project":
 9 "Simon is passionate about the site team working
 10 well together to ensure site management is to the
 11 highest standard."
 12 I'm certainly going to assume, Mr O'Connor, that
 13 that's correct.
 14 A. Absolutely.
 15 Q. "He confidently leads the on-site team in terms of
 16 design, technical requirements, health and safety,
 17 subcontractor management and customer care."
 18 Is that correct?
 19 A. I would not agree with the design part, no.
 20 Q. Right.
 21 "He is able to positively contribute technical
 22 expertise and facilitate informed choice for clients and
 23 residents during value engineering and decision making
 24 processes."
 25 Is that correct?

21

1 A. I don't think I've ever been part of a value engineering
 2 process. I've definitely been part of the residents
 3 choices and things like that, but I don't think I've
 4 ever been part of a value engineering process.
 5 Q. Right. It goes on:
 6 "This applies to projects at both pre-tender and
 7 pre-start stages."
 8 With the qualification you have made in relation to
 9 value engineering, is that correct?
 10 A. "This applies to ..."
 11 Yeah, I was very rarely involved pre-tender.
 12 Q. Right.
 13 Can you explain how this CV, which was presented to
 14 the TMO in order to win the project by Rydon, contained
 15 so many inaccuracies in respect of your CV?
 16 A. I can't.
 17 Q. No, okay.
 18 You say in your witness statement -- and it's
 19 paragraph 13 {RYD00094221/6} if you need it, and I don't
 20 think we need to go back to it -- that you wouldn't have
 21 been qualified to form a view on the compliance of
 22 designs. Is that correct?
 23 A. Correct.
 24 Q. Were you involved in any way with the value engineering
 25 process on this project?

22

1 A. No.
 2 Q. Were you aware that Rydon did have to find cost savings
 3 for its client, the TMO, on this project?
 4 A. I was aware that value engineering was being talked
 5 about, yes.
 6 Q. Can I ask you to look at your statement, please,
 7 {RYD00094221/9}, and I would like to look with you,
 8 please, at the end of paragraph 17. You say there,
 9 second line from the top:
 10 "However, I was aware from meetings I attended ..."
 11 Do you see that?
 12 A. Yep.
 13 Q. "... that there was a significant cost saving to be had
 14 for KCTMO. I recall that there were discussions ongoing
 15 regarding the choice of colour and the method of fixing
 16 of the cladding panels, but not the choice of aluminium
 17 or zinc."
 18 Were you involved in those discussions or aware of
 19 those discussions while design changes were being
 20 discussed?
 21 A. Sorry, I don't --
 22 Q. Were you involved in any of the meetings when the design
 23 changes were being discussed?
 24 A. This -- this would be discussed at a monthly meeting, so
 25 it would just be like an item, but there would be

23

1 separate meetings on that with the surveying team.
 2 Q. You say there that there was a significant cost saving
 3 to be had for KCTMO.
 4 Now, given that, did you appreciate that a change in
 5 the cladding rainscreen from zinc to ACM was a value
 6 engineering decision?
 7 A. At the time, no.
 8 Q. Right.
 9 I think from what you have told us before, you
 10 yourself made no contribution, so far as technical
 11 expertise is concerned, to this value engineering
 12 discussion that you refer to.
 13 A. No.
 14 Q. Did you yourself ever raise, during these discussions,
 15 the issue of fire safety?
 16 A. I don't think so. I don't recall.
 17 Q. Right.
 18 Did you take any steps in your role as project
 19 manager to ensure that the budgets were met? We touched
 20 on this before.
 21 A. Not particularly, no. I mean, I was there for
 22 programming and sequencing. I mean, there was people
 23 running the budget, and they would generally hire the
 24 subcontractors, you know, after -- like a mini tender,
 25 I presume, so that part of the budget would already be

24

1 done before they got to site .
 2 Q. On site , were you involved in any cost-cutting
 3 decisions?
 4 A. No.
 5 Q. So far as you're aware, as project manager, were any
 6 cost-cutting decisions made on site?
 7 A. Not that I'm aware of, no.
 8 Q. Can I ask you to turn back to page 2 {RYD00094221/2} of
 9 your witness statement, please, and at the top of that
 10 page we can see paragraph 3. You say five lines down:
 11 "I decided to leave Rydon in July 2015 to work for
 12 another company. I believe the last day I was the
 13 Project Manager on site was Thursday 23 July 2015 [so
 14 precisely five years ago], apart from a few days during
 15 the first week of August 2015 when I was asked to return
 16 to Grenfell to provide holiday cover. I was transferred
 17 to another project at Lea Bridge between July and
 18 September 2015. I left the company in September 2015
 19 after working out my notice period."
 20 Why did you leave Rydon, Mr O'Connor?
 21 A. I was given an opportunity to go -- there was a lot of
 22 pressures at the project at Grenfell , we was falling
 23 behind programme and there was a lot of pressure, and
 24 I was given the opportunity to join another company for
 25 significantly more money and another opportunity.

25

1 Q. You say there were a lot of pressures at the project at
 2 Grenfell ; is that in the summer of 2015?
 3 A. I just think leading up to it . I mean, I'm sure you've
 4 seen, you know, it was starting to fall behind
 5 programme, and, you know, when that happens, pressure --
 6 pressure happens when you have got to try and meet
 7 programmes.
 8 Q. Right.
 9 Can you help us with what other pressures were
 10 present on site during this project at that time?
 11 A. Extremely long days, you know, just a lot of pressure,
 12 you know, it was affecting my home life. When I was
 13 given the opportunity to leave, I didn't take it easily ,
 14 I had been there a long time, but the opportunity I was
 15 given was -- I couldn't really turn it down.
 16 Q. Did you feel at the time that you were being given
 17 support and help to be able to execute your role to the
 18 best of your ability at that time?
 19 A. Yeah, I was being given support. I mean, you know,
 20 I think we would all agree we can all have more support,
 21 but, you know, I was doing the best to complete my job.
 22 Q. All right .
 23 Now, can I turn to a completely different topic , and
 24 I want to ask you about your awareness of different
 25 types of cladding and other fires .

26

1 At the time of the Grenfell Tower project, were you
 2 aware of the different kinds of cladding panels that
 3 were available in the UK?
 4 A. No.
 5 Q. So you weren't aware that cladding panels were made with
 6 a variety of different materials , including metals and
 7 metal composites?
 8 A. At the time, no.
 9 Q. No.
 10 At the time, had you heard of the expression ACM,
 11 aluminium composite material?
 12 A. No, I hadn't.
 13 Q. Even though you had been involved on the Chalcots Estate
 14 project?
 15 A. Yeah, I had nothing to do with the cladding at all .
 16 I didn't even go on the scaffold .
 17 Q. Right.
 18 Does it follow from that that you wouldn't know and
 19 didn't know at the time that ACM material frequently
 20 contained a core made from polyethylene or PE?
 21 A. At the time, no.
 22 Q. And also that panels came with -- or some of them came
 23 with fire retardant cores which were less combustible?
 24 A. Again, at the time, no, I wouldn't have known, no.
 25 Q. To your knowledge, was there any general awareness

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1 within Rydon as the company about the availability of
 2 these different panels and different kinds of core?
 3 A. I don't know.
 4 Q. You don't know.
 5 Were you aware of any major fires that had occurred
 6 in residential buildings, either in the United Kingdom
 7 or elsewhere in the world, involving cladding?
 8 A. I don't believe so.
 9 Q. Were you aware or had you heard of the fire at
 10 Lakanal House in Southwark in the summer of 2009?
 11 A. Yes.
 12 Q. You had?
 13 A. Yes.
 14 Q. Can you explain how you came to be aware of that fire ?
 15 A. By the news.
 16 Q. At the time of the fire or --
 17 A. Yeah, I think it would have been at the time of the
 18 fire , that's when it would have been on the news.
 19 Q. Right.
 20 A. I think as well we had -- there might have been
 21 something sent round in the company, but I can't be sure
 22 on that .
 23 Q. Right.
 24 I know you can't be sure of it , and I'm asking you
 25 to remember more than ten years ago, but can you

28

1 remember when something was sent round within the
 2 company?
 3 A. I can't. It would have been a memo, but I couldn't tell
 4 you when or even if it happened.
 5 Q. Right. So you couldn't tell me what the memo said?
 6 A. Absolutely not.
 7 Q. Was there any training or continuing professional
 8 development organised by Rydon in the aftermath of the
 9 Lakanal House fire, do you remember?
 10 A. Not that I'm aware of, no.
 11 Q. That was 2009.
 12 Were you aware that there had been a spate of fires
 13 in high-rise buildings in the UAE in 2012 and 2013?
 14 A. No, I wasn't aware.
 15 Q. Or a fire in France in Roubaix in 2012?
 16 A. No.
 17 Q. Do I take it from that you were also unaware of the
 18 history of high-rise fires in the UK stretching back to
 19 1991, Knowsley Heights in 1999, Garnock Court?
 20 A. None of them ring a bell to me at all.
 21 Q. Right. You have heard of them since, have you?
 22 A. Them two you just mentioned, no.
 23 Q. Right, okay.
 24 I want to ask you about panels and see how much you
 25 knew at the time about that.

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1 At the time of the project and your involvement in
 2 it, did you know that the fire performance of ACM
 3 polyethylene panels, when made into cassettes, performed
 4 significantly worse than the fire performance of panels
 5 in the flat sheet riveted face-fixed form?
 6 A. I wasn't aware, no.
 7 Q. I want to go back to your contractual obligations, or
 8 rather Rydon's contractual obligations. We touched on
 9 this earlier on. I think you said you had had very
 10 little familiarity of that.
 11 Looking at your role as project manager leading the
 12 on-site team, do you accept that you had to be at least
 13 familiar with the main contractual obligations that
 14 Rydon owed to its client?
 15 A. I wouldn't say I would need to be familiar with it. My
 16 role was on the site, health and safety, you know,
 17 sequencing, co-ordinating. I wouldn't be quoting the
 18 contract to anybody.
 19 Q. Right. You wouldn't be quoting the contract to anybody,
 20 I quite understand, but would you want to make sure that
 21 you knew, at least in outline, what Rydon had promised
 22 its client it would do by way of this refurbishment?
 23 A. I probably should have done, yes.
 24 Q. But you didn't?
 25 A. I didn't.

30

1 Q. Right.
 2 Was the contract physically held on site in one of
 3 the site offices?
 4 A. I couldn't tell you. I don't recall it being on site,
 5 but ...
 6 Q. Right.
 7 So during your time on site, did no occasion arise
 8 when you thought you needed to look at the contract to
 9 make sure whether you had to do something or didn't have
 10 to do something?
 11 A. I would ask Simon Lawrence, Steve Blake. I wouldn't
 12 ever refer to the contract myself, no.
 13 Q. Can you remember any occasion when you did ask
 14 Simon Lawrence or Steve Blake about what the contract
 15 said you had to do or didn't have to do?
 16 A. I don't recall.
 17 Q. All right.
 18 Did you understand that, as the design and build
 19 contractor, Rydon as a company retained ultimate
 20 responsibility for the design of the Grenfell Tower
 21 refurbishment and the works related to it?
 22 A. At the time, no. I presumed that that responsibility
 23 would be passed on to the designers and architects.
 24 I didn't believe that would stay with Rydon at the time.
 25 Q. Oh, I see.

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1 So from that answer -- you say "I presume". At the
 2 time, what was your understanding about Rydon's
 3 responsibility?
 4 A. Sorry, I don't understand.
 5 Q. Well, you said in the last answer but one:
 6 "I presumed that that responsibility would be passed
 7 on to the designers and architects. I didn't believe
 8 that would stay with Rydon at the time."
 9 So at the time, was your understanding that Rydon
 10 actually had no responsibility at all because it had
 11 appointed subcontractors?
 12 A. I wouldn't say it had no responsibility at all, but
 13 I thought that that responsibility was shared throughout
 14 the specialist subcontractors to be compliant with what
 15 it needed to be compliant with.
 16 Q. Right.
 17 So would it follow from that that you didn't think
 18 at the time that if the subcontractors had done
 19 something wrong, nonetheless Rydon would be responsible
 20 to the TMO for the error?
 21 A. I suppose as the principal contractor, probably, yes.
 22 Q. Right.
 23 Did you understand that Rydon was responsible for
 24 carrying out and completing the works in a proper and
 25 workmanlike manner?

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1 A. Yes.
 2 Q. Did you understand that Rydon was responsible for
 3 carrying out and completing the works in accordance with
 4 statutory requirements?
 5 A. Yes.
 6 Q. And in accordance with good building practice?
 7 A. I think that forms part of the statutory requirements,
 8 doesn't it?
 9 Q. You were responsible for monitoring the inspection
 10 process, I think. Did you know at the time that there
 11 were various bodies within the construction industry
 12 which produced guides to establishing good building
 13 practice?
 14 A. I would have been aware.
 15 Q. Yes. Did you read any of those guides? Were you
 16 familiar with them?
 17 A. Not that I recall.
 18 Q. Right.
 19 Now, statutory requirements would include the
 20 Building Regulations, wouldn't it?
 21 A. Yes.
 22 Q. So did you understand at the time that Rydon was fully
 23 responsible in all aspects for the design of the works?
 24 A. Probably not, I thought that would be the specialist
 25 designers to ensure that all of the drawings and designs

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1 they put forward complied with the legislation at that
 2 time.
 3 Q. What was Rydon's role in that, do you remember?
 4 A. Rydon's role in what, sorry?
 5 Q. In ensuring that all of the drawings and designs that
 6 the specialist designers put forward complied with the
 7 legislation?
 8 A. I would presume that would be part of the contract
 9 between the designers and the architects and everyone
 10 else. I would imagine there would be a line in there to
 11 say, "All your designs must comply with X, Y and Z".
 12 Q. Right.
 13 Now, can I take you to your witness statement,
 14 paragraph 14, {RYD00094221/7}. You say there that:
 15 "There were design team meetings throughout my time
 16 working on the project. I would be present for most of
 17 these meetings, but not all of them, so that I was aware
 18 of any discussions taking place from a logistics,
 19 programming and progress perspective and so that, as
 20 Project Manager, I could make sure things were happening
 21 at the right time on site."
 22 I read that to you earlier on.
 23 A slightly different question: did you yourself ever
 24 investigate whether Rydon was complying with those
 25 obligations, the obligations we have discussed?

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1 A. I didn't.
 2 Q. Do you remember or know whether any other employee of
 3 Rydon involved with this project was investigating
 4 whether Rydon was complying with those obligations?
 5 A. I don't know.
 6 Q. You don't know.
 7 I'm going to ask you a number of questions about the
 8 adequacy of drawings, but I suspect these won't be very
 9 long questions.
 10 When Rydon came into the project in the spring of
 11 2014 -- and I know you joined the project in the May of
 12 that year. Just for your benefit, the tender had been
 13 successful and Rydon had been notified in the middle of
 14 March 2014, and then the contract terms began to be
 15 discussed in the April of 2014. That's the background.
 16 When you came into the project, what stage did you
 17 believe design had reached?
 18 A. Of the whole refurbishment or just the external ...?
 19 Q. Of the whole of the refurbishment.
 20 A. 60/70%.
 21 Q. Right. Are you able to tell us what that is in RIBA
 22 terms, what stage?
 23 A. No.
 24 Q. Stage C, D, E, F?
 25 A. I wouldn't be able to --

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1 Q. Are you familiar with those RIBA stages?
 2 A. No.
 3 Q. Right.
 4 Now, at paragraph 13 of your statement
 5 {RYD00094221/6}, if you can go back a little bit,
 6 please, you say there in the first sentence:
 7 "By the time Rydon became involved in the project
 8 the design by KCTMO and Studio E was at an advanced
 9 stage."
 10 Now, when you came into the project, did you see any
 11 1:5 scale drawings?
 12 A. There were a number of drawings, yes.
 13 Q. Yes; did you see any 1:5 scale drawings?
 14 A. I can't remember the scale, to be honest.
 15 Q. Right.
 16 Do you remember seeing any -- let me put it this
 17 way -- big detailed drawings produced by Studio E
 18 showing, for example, the details of cavity barriers
 19 around the windows?
 20 A. I don't specifically remember seeing them, no.
 21 Q. No.
 22 What is the basis for your saying that when Rydon
 23 became involved in the project, the design was at
 24 an advanced stage? What gave you to think that the
 25 design was at an advanced stage?

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1 A. Because the majority of the work for me would have been
2 the, you know, external overclad, which I believe had
3 already been decided as to what it would be. It was
4 just basically a colour and fixings point of view, and
5 I believe that JS Wright were working on the design.
6 That's why I said it was 60/70% through, which I think
7 is quite an advanced stage.
8 Q. Right.
9 Did you think that the drawings you saw at that
10 stage were sufficient for you to be able to progress or
11 co-ordinate the progression of the works on site?
12 A. I don't recall.
13 Q. Do you ever recall thinking that the designs were
14 inadequate for your purposes?
15 A. No, I don't recall that either.
16 Q. So you never had an occasion to wonder about whether the
17 drawings actually helped you or not?
18 A. I mean, if there was glaringly obvious things missing
19 from the drawing, then yes. But no, other than that.
20 Q. Do you remember any occasion when you did see something
21 that to your eyes was glaringly obviously missing from
22 a drawing?
23 A. I think there was once a door missing from a room, if
24 I'm honest, and that was it.
25 Q. Right. When you say "glaringly obvious", is that

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1 an example of the kind of thing you mean?
2 A. Yeah.
3 Q. Right.
4 Is the reality, Mr O'Connor, that you weren't
5 sufficiently qualified to assess what stage the design
6 had reached or to notice any material or important
7 omissions --
8 A. Yes.
9 Q. -- other than those which were glaringly obvious in the
10 way you've described?
11 A. Yes.
12 Q. Can I then ask you about workmanship.
13 Were you familiar, even in outline, with Rydon's
14 contractual obligations relating to workmanship and
15 materials?
16 A. In what manner?
17 Q. Well, I don't want to go back to the contract, but were
18 you aware that Rydon was obliged -- and for our
19 purposes, this is clause 2.2.1 -- to make sure that all
20 materials, goods and workmanship used in the execution
21 of the works shall be of such kind and of such quality
22 as are necessary to allow the contractor to comply with
23 his obligation under this contract?
24 I know that's a bit of legalese, but were you aware,
25 at least in outline, that that was an obligation Rydon

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1 had assumed to the TMO?
2 A. I wasn't aware of that clause or that wording.
3 Workmanship to me is, you know, finishes and making sure
4 it's done in line with the drawings, not -- I don't
5 recall that contract clause at all.
6 Q. What was your understanding about whether Rydon could
7 make substitution for any materials or goods or
8 workmanship which had been set out in the employer's
9 requirements?
10 A. I think that would need to go back to Studio E if there
11 was going to be some sort of change.
12 Q. Right.
13 A. And TMO, I imagine, as well.
14 Q. I see. So in outline, can we take it that, as far as
15 you understood, any substitution of materials, goods or
16 workmanship could only happen with the permission of
17 Studio E and the TMO?
18 A. Yes.
19 Q. I don't want to put words in your mouth, but I'm just
20 trying to clarify or crystallise your answer.
21 A. Yes.
22 Q. I see.
23 So far as you are aware, what system was in place
24 within Rydon to make sure that any substitution that
25 I've just asked you about happened so that the TMO and

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1 Studio E knew about it and could give their consent?
2 A. There was a change tracker.
3 Q. Right.
4 Did you yourself put in place or did you know that
5 there was in place any system for monitoring whether
6 materials were being substituted in the order chain or
7 on site?
8 A. No.
9 Q. Was there a process in place for obtaining the consent
10 from the TMO for materials substitution?
11 A. That would again be the change tracker, I would imagine.
12 Q. Was there a system in place for checking that any new
13 materials complied with the statutory requirements?
14 When I say "new", I mean substituted materials complied
15 with the statutory requirements.
16 A. I would envisage that to be something that Studio E
17 would have looked at when we -- when a new material was
18 put forward.
19 Q. But that's not something you looked at?
20 A. It's not something I looked at, no.
21 Q. Was there a system that you knew of that, whereby it
22 could be checked whether Building Control were kept
23 informed of changes to material on site?
24 A. I don't recall. They may have been sent a change
25 tracker by Simon. I don't recall.

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1 Q. You don't know.
 2 SIR MARTIN MOORE-BICK: Can I ask you this: who was
 3 responsible for checking materials coming on to the
 4 site?
 5 A. It would have been the subcontractors. So they ordered
 6 their own materials. It would have been brought in
 7 through the rear gate by one of the marshals.
 8 SIR MARTIN MOORE-BICK: Yes.
 9 A. But if you're asking if one of the managers was there to
 10 sign it off when it come in, no.
 11 SIR MARTIN MOORE-BICK: That was what I was asking, because
 12 what was going through my mind was: if a lorryload of
 13 a substitute material came in, who would be aware of
 14 that and who would control it? But your answer is,
 15 I think, it would be the subcontractors.
 16 A. Yes.
 17 SIR MARTIN MOORE-BICK: Thank you.
 18 MR MILLETT: Does that tell us that even though the
 19 subcontractors would know that a lorryload of substitute
 20 material had come in, there was no system for them
 21 reporting that to the Rydon site managers and from them
 22 to you?
 23 A. I don't believe there was a system in place, but there
 24 were -- as I had understood it, they were tried and
 25 tested trusted subcontractors, so if there was going to

1 be a change, it would have been discussed with Simon,
 2 Studio E and the TMO.
 3 Q. Yes.
 4 Really what I'm trying to get at, just to pursue
 5 the Chairman's question a bit, is how high within the
 6 Rydon chain of command knowledge of what was coming on
 7 to site through the rear gates went. I think you're
 8 telling us it didn't come as high as you?
 9 A. Not generally, no. I wouldn't be there, you know, for
 10 someone to say, "We've just had a lorryload of this turn
 11 up". That wasn't my role.
 12 Q. Right.
 13 I would like to ask you some questions about the
 14 employer's requirements, and to begin with the
 15 preliminaries.
 16 Can I ask you just in general terms: were you
 17 familiar, at least in passing, with the employer's
 18 requirements for this project?
 19 A. In passing, yes.
 20 Q. Is it fair to say that it was your role as project
 21 manager to co-ordinate the works?
 22 A. Yes.
 23 Q. Yes.
 24 Can I ask you to look at {TMO10041791/128}, please.
 25 This is part of -- I should just tell you,

1 Mr O'Connor -- the formal contract, and you can see
 2 page 1 of this document on the screen. There it is. We
 3 went past it, but there it is.
 4 Just looking at it now, is this a document you have
 5 ever seen before, do you think?
 6 A. It doesn't look familiar.
 7 Q. No, and that's really what you told us earlier in your
 8 evidence.
 9 Let's just look -- if we can see page 128 and see if
 10 this is something you saw at the time.
 11 This is the section of the preliminaries entitled
 12 "A32 Management of the Works".
 13 Did you at the time familiarise yourself with the
 14 requirements set out there, and particularly
 15 paragraph 110, "Supervision"?
 16 A. I don't -- I don't recall if I read this or not.
 17 Q. Right.
 18 Let's just see if it jogs a memory. I mean, you can
 19 see that it's 128 pages into a pretty dense legal
 20 document, and it's entitled "Supervision":
 21 "• General: Accept responsibility for coordination,
 22 supervision and administration of the Works, including
 23 subcontracts.
 24 "• Coordination: Arrange and monitor a programme
 25 with each subcontractor, supplier, local authority and

1 statutory undertaker, and obtain and supply information
 2 as necessary for coordination of the work."
 3 That was Rydon's obligation to the TMO. Can you
 4 confirm that it was your responsibility within the chain
 5 of command at Rydon to ensure that Rydon complied with
 6 it?
 7 A. Yes.
 8 Q. Can you tell us what you did to arrange and monitor
 9 a programme with each subcontractor, supplier,
 10 local authority and statutory undertaker, as you can see
 11 in the second bullet point?
 12 A. I wouldn't have particularly dealt with the
 13 local authority. I'm not sure what a statutory
 14 undertaker is.
 15 Q. Someone who supplies water or gas.
 16 A. Oh, right, okay, fine. Yeah, so I wouldn't -- I would
 17 have dealt with them, I would have arranged and
 18 monitored the programme, and I would have probably
 19 co-ordinated the subcontractors, yes.
 20 Q. Right. So when you say you would have arranged and
 21 monitored a programme with each subcontractor, how did
 22 you go about that?
 23 A. We would sit down with the subcontractor and the
 24 relevant manager and agree a monthly or weekly meeting.
 25 I wouldn't particularly go to these, but it was to

1 monitor sort of their progress against programme, and
 2 ask them to put it in sort of -- almost like a mini
 3 report to us.
 4 Q. Right.
 5 You can see in the second bullet point it says that
 6 part of your job was to obtain and supply information as
 7 necessary for co-ordination of the work. What did you
 8 do to do that?
 9 A. I would get the drawings and pass them on to the
 10 relevant managers.
 11 Q. Right. What about information relating to materials?
 12 A. That would be on the drawing.
 13 Q. Were you only reliant on the drawing to find out what
 14 materials had to go on to the building, when you were
 15 obtaining and supplying information as necessary for
 16 co-ordination of the work?
 17 A. I think most people had a copy of the -- is it the
 18 NBS spec, as I recall. Most people would have had
 19 a copy of that on their computer, so if there was any
 20 queries, you could go to that.
 21 Q. Right. We will come to the NBS spec in due course, but
 22 I note the answer.
 23 If you look at the foot of the page, 119B,
 24 "Building Control":
 25 "The Contractor will be responsible for providing

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1 additional Construction Stage information to Building
 2 Control."
 3 Do you see that?
 4 A. Yeah.
 5 Q. Did you appreciate at the time that that was a part of
 6 something you were responsible for?
 7 A. No.
 8 Q. Right.
 9 Was there any process in place, so far as you knew,
 10 to make sure Rydon had possession of any or all
 11 additional construction stage information so that it
 12 could be passed on to Building Control?
 13 A. I believed that was being done by Studio E,
 14 Simon Lawrence.
 15 Q. Right. So it wouldn't pass through your hands?
 16 A. It might pass through my hands on a cc on an email, but
 17 it's not something that -- I don't recall ever sending
 18 Building Control construction stage information.
 19 Q. Right.
 20 Can we look at page 135 {TM10041791/135} of the same
 21 document, please. This is the section A33, entitled
 22 "Quality/standards control", and if you look at
 23 paragraph 170A, two-thirds of the way down the page,
 24 "Manufacturer's recommendations/instructions", there it
 25 says:

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1 •" General: Comply with manufacturer's printed
 2 recommendations and instructions current on the date of
 3 the Invitation to tender.
 4 •" Changes to recommendations or instructions:
 5 Submit details.
 6 •" Ancillary products and accessories: Use those
 7 supplied or recommended by main product manufacturer.
 8 •" Agreement certified products: Comply with
 9 limitations, recommendations and requirements of
 10 relevant valid certificates."
 11 Can you tell us what systems Rydon had in place to
 12 make sure that Rydon's employees, such as yourself and
 13 your site managers, and the subcontractors were aware of
 14 the manufacturer's printed recommendations and
 15 instructions?
 16 A. I wouldn't be able to tell you that. We relied on, like
 17 I've said before, the specialists, the architects, to
 18 ensure that whatever they're putting forward is in line
 19 with that.
 20 Q. I see. So would it follow from that that you also had
 21 no -- or you can't help us as to whether there was in
 22 place a system for making sure that Rydon employees and
 23 subcontractors complied with manufacturer's printed
 24 instructions and recommendations?
 25 A. I can't guarantee that, no.

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1 Q. No. If we look on at page 139 {TM010041791/139},
 2 please.
 3 Let's look at paragraph 510, "Supervision". This is
 4 under the title "Supervision/inspection/defective work".
 5 That fell within your remit, didn't it?
 6 A. Yes.
 7 Q. You can see it says:
 8 •" General: In addition to the constant management
 9 and supervision of the Works provided by the
 10 Contractor's person in charge, all significant types of
 11 work must be under the close control of competent trade
 12 supervisors to ensure maintenance of satisfactory
 13 quality and progress.
 14 •" Replacement: Give maximum possible notice before
 15 changing person in charge or site agent."
 16 Now, the contractor's person in charge that we see
 17 there, was that the project manager, ie you?
 18 A. The principal contractor, is that what we're referring
 19 to?
 20 Q. Well, I'm looking at 510 and the reference to "the
 21 contractor's person in charge".
 22 A. It would have been me or Simon, yes.
 23 Q. I see.
 24 Did you understand that that role was occupied by
 25 you? When you say, "It was me or Simon", do you mean

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1 you alternated in that role or that you're not sure
 2 whether the role was yours or his?
 3 A. I think this role probably would have been passed on to
 4 a site manager, because they were out on the ground, so
 5 to speak, checking quality alongside the clerk of works.
 6 Q. Were there any processes in place at Rydon to make sure
 7 that significant types of work would be under the close
 8 control of competent trade supervisors?
 9 A. There was competent trade supervisors for most of the
 10 contractors, yes.
 11 Q. What are competent trade supervisors, or who were they
 12 in this context?
 13 A. I think from memory we had Ben Bailey from Harley. Am
 14 I okay naming these people?
 15 MR MILLET: Yes, you can.
 16 SIR MARTIN MOORE-BICK: Of course, yes.
 17 A. So Ben Bailey from Harley. I don't remember the -- oh,
 18 Richard from JSW ... and I can't remember the name of
 19 the electrical --
 20 MR MILLET: Taking Ben Bailey -- Ben Bailey was the younger
 21 Bailey at Harley, wasn't he?
 22 A. He was.
 23 Q. In the role of a competent trade supervisor, he would be
 24 essentially supervising the work of his own company,
 25 wouldn't he?

1 A. Yes.
 2 Q. How would that be proper and adequate supervision?
 3 A. We also had external managers as well.
 4 Q. Right, okay.
 5 Did Rydon, and specifically you, assess the
 6 competency of trade supervisors in this context?
 7 A. No. They would -- especially Harley, as far as I was
 8 aware, they had worked with Rydon for a number of years
 9 and were considered competent at the time.
 10 Q. You referred to external managers; who were you
 11 referring to?
 12 A. Daniel Osgood was one of them.
 13 Q. He is a Rydon employee, isn't he?
 14 A. Yeah. There was a few that come and go, it was quite
 15 a ...
 16 Q. Yes, I understand that, but taking Daniel Osgood as
 17 an example, he is a Rydon employee. So are you saying
 18 that by "external managers", those were Rydon people --
 19 A. Yes.
 20 Q. -- being trade supervisors?
 21 A. Yeah, so basically what would happen is they would
 22 install a section of work, it would then be snagged by
 23 them, and then it would be offered to a Rydon supervisor
 24 or manager -- site manager, sorry, and it would then be
 25 offered to the clerk of works for inspection prior to it

1 being covered up or anything being covered up.
 2 Q. I see.
 3 Can I ask you to look at page 141 {TMO10041791/141}
 4 and paragraph 630 in this same document, "Quality
 5 control". You see that there. It says:
 6 •" Procedures: Establish and maintain to ensure that
 7 the Works, including the work of subcontractors, comply
 8 with specified requirements.
 9 •" Records: Maintain full records, keep copies on
 10 site for inspection, and submit copies on request.
 11 •" Content of records ..."
 12 And you can see the four bullet point requirements
 13 set out under there:
 14 "- Identification of the element, item, batch or lot
 15 including location in the Works.
 16 "- Nature and dates of inspections, tests and
 17 approvals.
 18 "- Nature and extent of nonconforming work found.
 19 "- Details of corrective action."
 20 Were there any procedures in place at Rydon for
 21 establishing and maintaining a system where works
 22 complied with these specified requirements?
 23 A. So the dates and the -- everything you have just read,
 24 yes, there was, yes. It would be on the RMS system and
 25 it would be just a log of when it was inspected by us,

1 when it was inspected by Building Control, if there was
 2 any negative or positive comments from Building Control,
 3 and that would have all been kept on site .
 4 Q. What is the RMS system?
 5 A. Rydon management system.
 6 Q. Is that an electronic database?
 7 A. Yes.
 8 Q. Did you have access to that?
 9 A. Everyone did, yeah.
 10 Q. Right. Did you use it?
 11 A. Yes.
 12 Q. Did you use it regularly?
 13 A. Yes.
 14 Q. What did you do when using it?
 15 A. There were sections in there that I needed to do on
 16 a daily basis, to keep the records up to date.
 17 Q. Right.
 18 A. I can't recall exactly they were, it was a long time
 19 ago.
 20 Q. So what would you input into that system, generally
 21 speaking?
 22 A. Probably like a daily diary maybe, from my point of
 23 view. Subcontractor performance, maybe how many men
 24 were on site for -- it was just general data that
 25 I would be inputting into there.

1 Q. Right.
 2 Can we leave this document and go to paragraph 20 of
 3 your witness statement {RYD00094221/10}. You say there:
 4 "The process for the inspection of works was as
 5 follows. Rydon Site Managers would be inspecting the
 6 area of work that they were responsible for on a daily
 7 basis."
 8 Then you go on to give a bit of detail about what
 9 they did.
 10 Then two-thirds of the way down that paragraph, you
 11 say:
 12 "I would try to do a couple of rounds of the site
 13 each day looking at the site in general, checking
 14 progress overall, that contractors working in the areas
 15 that they should be and looking out for any health and
 16 safety issues. However, as the Project Manager, it was
 17 not part of my role to inspect in detail the work being
 18 carried out."
 19 Did you make any records of your inspections that
 20 you refer to there?
 21 A. I don't recall. I know there was emails sent after some
 22 of them because we had seen stuff that we wasn't happy
 23 with, but I wouldn't have come back and wrote a report
 24 each time I went out.
 25 Q. I see.

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1 Did you keep a daily log or diary or report of your
 2 own, either yourself or on the RMS system, about what
 3 you did on your rounds?
 4 A. There would have been a handwritten diary, yes.
 5 Q. A handwritten diary?
 6 A. Yeah.
 7 Q. Do you know what happened to that?
 8 A. It was on site when I left.
 9 Q. Right. Was that a diary personal or private to you or
 10 was that a diary that was shared by others on site?
 11 A. It was just my diary for the day, just so as I could
 12 record anything of importance.
 13 Q. Okay.
 14 Still on the subject of inspections and quality
 15 control, can I now turn to the NBS specification that
 16 you referred to before, which we will find at
 17 {SEA00000169/68}, please. This is section H92. This
 18 one is dated 30 January 2014, this is the last edition
 19 of it before Rydon won the tender.
 20 Just looking at the first page of this
 21 {SEA00000169/1}, you can see it's NBS specification,
 22 just to jog the memory. This is the document you were
 23 referring to earlier.
 24 A. Yes.
 25 Q. Can we go to page 68 {SEA00000169/68}, please, which is

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1 section H92 under "General requirements/preparatory
 2 work". You can see that at the very bottom of the page,
 3 this is "H92 Rainscreen cladding"; yes?
 4 A. Yeah.
 5 Q. This is part of the NBS spec that deals with rainscreen
 6 cladding.
 7 You can see at paragraph 232 at the bottom "Quality
 8 plan":
 9 "Requirement: Submit during detailed design.
 10 "Content: In accordance with BS EN ISO 9001 and
 11 including the following ..."
 12 You have got the name of the quality manager,
 13 quality assessment procedures and inspection procedures
 14 to be adopted in checking the work.
 15 Then if you go a little further down to the
 16 second-from-one entry at the bottom:
 17 " Certification that completed work complies with
 18 specification."
 19 Do you see that?
 20 A. I do.
 21 Q. Did those things fall within your responsibility as
 22 project manager?
 23 A. I don't believe so.
 24 Q. Whose responsibility or whose remit did they fall
 25 within?

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1 A. I think they would be various ...
 2 (Pause)
 3 So there's things like procedure for registering and
 4 reporting non-compliances, that could be any of the
 5 managers. Managing procedures and calibration records,
 6 again that could be any of the managers.
 7 Q. Right.
 8 A. Certification that completed work complies with
 9 specification, I've not seen a certificate that -- like
 10 that.
 11 Q. Right, okay.
 12 Were you familiar at the time with BS EN ISO 9001?
 13 A. At the time, no.
 14 Q. It says there "Name of the quality manager". Who was or
 15 who were the quality manager or managers during this
 16 project?
 17 A. The quality managers would have been someone from the
 18 office that would come down and audit the site.
 19 Q. I see, someone from the office. During your time, do
 20 you remember who that was?
 21 A. I want to say Barry Rutley.
 22 Q. Okay.
 23 How often did Barry come down to audit the site?
 24 A. I couldn't be sure. It might have been monthly, it may
 25 have been bi-monthly, I don't know.

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1 Q. Do you know what he did?
 2 A. He would come to site with a template check sheet which
 3 he needed to go through, which I think went through the
 4 drawings as long as we had all the RAMS for the
 5 subcontractors, they're up to date. I think he would
 6 check the electrical certificates and stuff like that.
 7 Q. Right.
 8 A. But I don't recall much more than that.
 9 Q. Did he look at individual instances of workmanship or
 10 was he auditing the records?
 11 A. He was auditing the records.
 12 Q. So he didn't go and look at anything physical on the
 13 site?
 14 A. He would have done, just for his own knowledge, but
 15 I don't think he would have commented on it.
 16 Q. What was he looking for, do you know?
 17 A. I think it was just to see the progress, really.
 18 Q. Right, I see.
 19 Was it your job to ensure that quality assessment
 20 procedures were put in place in accordance with
 21 EN ISO 9001?
 22 A. We did have quality assurance in there, but I wouldn't
 23 know if it would be in line with BS EN.
 24 Q. No, but was it your job to ensure, even if you didn't
 25 know about BS EN, that quality assessment procedures

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1 were in place for the project?
 2 A. Yes.
 3 Q. Yes, I see.
 4 Was it your job to check that those quality
 5 assessment procedures were carried out?
 6 A. Yes.
 7 Q. And carried out --
 8 A. Essentially, yes, yeah.
 9 Q. And carried out adequately?
 10 A. I mean, I would go on what -- you know, the managers
 11 would take the clerk of works or Building Control or
 12 whoever out. They would come back with a report and
 13 I would have a chat with the relevant person when they
 14 come back to the office, and then that would have been
 15 noted, you know, in the relevant place.
 16 Q. I see.
 17 Was it your job to ensure that proper inspection
 18 procedures were in place?
 19 A. It wouldn't be my job directly, it would be someone that
 20 I would -- if it was an external manager, then there
 21 would be a procedure in place for inspecting the
 22 externals, but it wouldn't be me doing it.
 23 Q. Would it be you supervising those inspections?
 24 A. I'd be overseeing the people doing them, yes.
 25 Q. When you say external manager, do you know who the

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1 external manager was who was responsible for
 2 establishing the inspection procedures to be adopted in
 3 checking the work?
 4 A. At the time it would have been Daniel Osgood.
 5 Q. Just so I'm completely clear on your answer, if you look
 6 back at the document, 232, "Quality plan", third bullet
 7 point down, "Inspection procedures to be adopted in
 8 checking the work", who was it who established those
 9 inspection procedures?
 10 A. Well, I would have sat down with the subcontractor and
 11 relevant manager --
 12 Q. Right.
 13 A. -- and put a plan forward, ie, you know, inspecting
 14 every week or every few days or whatever it would have
 15 been required.
 16 Q. Did you ever give any written instructions to site
 17 managers in relation to inspection of the works?
 18 A. I did, yes.
 19 Q. You did. And how would those written instructions --
 20 A. They were minuted. It was a meeting on the externals
 21 with Harley, and I requested marked-up elevations on
 22 a weekly basis to go to the relevant manager.
 23 Q. Marked up by whom?
 24 A. Marked up by Harley.
 25 Q. What kind of mark-up -- when you say elevations, do you

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1 mean drawings?
 2 A. Yeah.
 3 Q. So what sort of mark-ups would Harley put on the
 4 drawings on a weekly basis?
 5 A. They would colour code where they had been, and each
 6 colour would have a different -- I'm colour blind so,
 7 you know, but each colour would be, like, installation
 8 was on here or rails were on here or brackets were on
 9 there.
 10 Q. Right. So the marked-up elevations were -- it sounds as
 11 if what you are telling us is that the marked-up
 12 elevations that Harley produced were about progress
 13 rather than about the design itself?
 14 A. Yes.
 15 Q. So did you ever see any marked-up drawings where design
 16 was changed?
 17 A. No.
 18 Q. Right.
 19 A. Not that I recall.
 20 Q. I see.
 21 Did you produce a method statement on inspection of
 22 the works?
 23 A. Not a method statement, no, it's not something we ever
 24 did.
 25 Q. Did you give any training to site managers who were

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1 reporting to you about how they should go about
 2 inspecting any part of the works?
 3 A. Not actual training, I'm not qualified to train people
 4 how to inspect stuff. I mean, they have been with --
 5 the majority of people there, other than I think the two
 6 people we have mentioned, had been with the company
 7 a fair while.
 8 Q. Can you look at paragraph 21 of your witness statement,
 9 please. This is at page 10 {RYD00094221/10}. You say:
 10 "There was also a system for inspecting works on
 11 completion of a particular section. In relation to the
 12 external cladding works, for example, completed areas of
 13 substructure would be inspected before the installation
 14 of cladding. The subcontractor's supervisor would first
 15 inspect their work against the relevant drawings before
 16 it was handed over to Rydon's Site Managers."
 17 Do you see that there?
 18 A. Yep.
 19 Q. "I was not involved in the inspections myself, but
 20 I know from my time as a Site Manager that the Rydon
 21 Site Managers would also inspect the subcontractor's
 22 work using the relevant specifications and drawings."
 23 Pausing there, is it fair to say that your
 24 understanding was that all works would be inspected by
 25 subcontractors under their internal processes after it

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1 was completed?
 2 A. At the relevant stages, not after it was completed.
 3 Q. Okay. Then at those relevant stages, Rydon would then
 4 conduct its own inspection?
 5 A. Yes, and then Building Control and the clerk of works
 6 would be offered to come and inspect that work as well.
 7 Q. Yes.
 8 Just to confirm what you say in the second line at
 9 the top of page 11 {RYD00094221/11}, the checks were
 10 made against the relevant specifications and drawings;
 11 yes?
 12 A. Generally, yes.
 13 Q. To what extent were you involved yourself in remedying
 14 workmanship issues which might arise from those
 15 inspections?
 16 A. I wouldn't have been involved particularly unless it
 17 became a problem. Them inspections -- our comments
 18 would go back to the relevant subcontractors and they
 19 would be asked to resubmit the inspection once they had
 20 completed the works, ie the stuff that needed to be put
 21 right.
 22 Q. I follow. I see.
 23 When we talk about the drawings here, are we talking
 24 about the as-built drawings issued by Studio E after
 25 revisions from the design team or other drawings?

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1 A. They wouldn't be as-built drawings, you get them at the
 2 end; it would be construction drawings.
 3 Q. Construction drawings.
 4 Is it right that the relevant drawing to be used by
 5 whoever was undertaking the inspection would be
 6 identified by a unique number given to each drawing?
 7 A. Yes.
 8 Q. Right.
 9 A. And probably checked with the drawing register as well
 10 prior to going out.
 11 Q. Which drawing register?
 12 A. The drawing registers that were in the files.
 13 Q. Who was responsible for compiling and maintaining the
 14 drawing register that was in your files?
 15 A. Simon Lawrence would have done it.
 16 Q. I see.
 17 During your time on the project, was there always
 18 a drawing register that you have just referred to?
 19 A. Yeah.
 20 Q. Do you know when it was first established?
 21 A. I don't. It would have been pre-me, because I think
 22 Studio E obviously started the process of drawings and
 23 drawing registers, alongside the original contractors,
 24 so ...
 25 MR MILLETT: Yes.

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1 Mr Chairman, it's 11.15, and I have about four
 2 questions left on this topic.
 3 SIR MARTIN MOORE-BICK: Why don't you finish them and we
 4 will break them?
 5 MR MILLETT: Very good.
 6 Mr O'Connor, can I just ask you to go back to
 7 paragraph 21, where you say in the third line:
 8 "If anything was snagged during this inspection it
 9 would be de-snagged and then re-inspected before the
 10 work was handed over to the Clerks of Works to inspect
 11 on behalf of KCTMO. As far as I am aware, the Clerks of
 12 Works followed exactly the same process of comparing the
 13 works with the drawings and specifications. If anything
 14 was snagged by the Clerks of Works, Rydon would ask the
 15 relevant subcontractor to rectify it. The Clerks of
 16 Works would then either re-inspect the work or ask for
 17 photographic evidence to show what had been done."
 18 In the light of that statement, is it fair to say
 19 that it was your understanding at the time that quality
 20 inspections beyond those undertaken by the subcontractor
 21 during the initial construction, such as by the clerk of
 22 works, were also conducted against drawings?
 23 A. Yes.
 24 Q. Which drawings? Were they the as-built drawings or were
 25 they drawings at an earlier stage?

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1 A. Construction drawings.
 2 Q. Construction drawings.
 3 Just so that we're clear, the construction drawings,
 4 are those the ones marked "Approved for construction" by
 5 Harley, when we are looking at the external cladding at
 6 least?
 7 A. Yeah, I mean, I would expect to see it stamped by
 8 Studio E as well.
 9 Q. Yes.
 10 Can I then just ask you to look at the witness
 11 statement of Jason North.
 12 Before I do, I will just get you to confirm,
 13 Jason North was a site manager working for Rydon on the
 14 Grenfell Tower project, wasn't he?
 15 A. He was.
 16 Q. Was he answerable to you?
 17 A. He was.
 18 Q. This is {RYD00094233}. This is the first page of his
 19 statement. I would like you to go to the second page of
 20 his statement {RYD00094233/2}, please, and paragraph 13
 21 within it. He says there:
 22 "The contractors undertook the work, my role was to
 23 ensure that they did it on time, to budget and safely.
 24 There was a quality control system in place; once the
 25 work was complete the foreman of the contractor checked

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1 for snags and remedied these; then the work was handed
 2 to me and I checked for further snags which were
 3 remedied by the contractor if identified; the Clerk
 4 Works then checked the work and lastly Building Control
 5 carried out its own inspections where required. My
 6 checks also included checking health and safety and that
 7 the work adhered to the drawings."
 8 Does that accord with your understanding of how
 9 Rydon's site managers conducted quality inspections of
 10 the works?
 11 A. Yes.
 12 MR MILLETT: Thank you.
 13 Mr O'Connor, I'm going to ask the Chairman if we can
 14 take the break now.
 15 SIR MARTIN MOORE-BICK: Yes, is that a convenient point?
 16 MR MILLETT: Yes, thank you.
 17 SIR MARTIN MOORE-BICK: We are going to have a break now,
 18 Mr O'Connor, and I am going to ask you to go with the
 19 usher in just a moment.
 20 Before you do that, can I just say, please don't
 21 talk to anyone about your evidence while you're out of
 22 the room.
 23 THE WITNESS: Yeah, no worries.
 24 SIR MARTIN MOORE-BICK: We will come back at 11.35, please.
 25 Thank you very much.

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1 (Pause)
 2 Good, thank you, 11.35, please.
 3 (11.18 am)
 4 (A short break)
 5 (11.35 am)
 6 SIR MARTIN MOORE-BICK: Ready to carry on, Mr O'Connor?
 7 THE WITNESS: Yes.
 8 SIR MARTIN MOORE-BICK: Very good. Thank you very much.
 9 Yes, Mr Millett.
 10 MR MILLETT: Thank you, Mr Chairman.
 11 Mr O'Connor, you told us earlier this morning that
 12 you were responsible for health and safety on site. Is
 13 that right?
 14 A. That's correct.
 15 Q. How could you ensure health and safety on site if you
 16 did not know yourself what, by way of materials, was
 17 being delivered to site at any given time?
 18 A. That's not really relevant to health and safety, as in
 19 my role in health and safety, you know, it is: is the
 20 work being carried out in a safe manner? You know, are
 21 they doing what's in their risk assessment method
 22 statements? That was my sort of role in health and
 23 safety.
 24 Q. Was your role in health and safety not also to include
 25 ensuring that there were no dangerous materials stored

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1 on site?
 2 A. I wouldn't say so, no.
 3 Q. Right.
 4 How, if you were responsible for health and safety
 5 on site, were you to discharge that function, carry out
 6 that role, if you didn't know whether there were or
 7 weren't any dangerous materials on site?
 8 A. Like I said, my role was around the construction work,
 9 not, you know, what was coming on to site. As far as
 10 I knew, we had no dangerous materials on site.
 11 Q. How could you be sure that suppliers were supplying
 12 material that did not present an unreasonable health and
 13 safety risk?
 14 A. Sorry, I don't understand that question.
 15 Q. Well, if you were responsible for health and safety on
 16 the site, but you didn't know what was coming on to
 17 site, how could you be sure that suppliers were
 18 supplying materials to site that did not present
 19 a health and safety risk?
 20 A. Because I would presume that that would be -- that that
 21 risk would have been taken out during the design stage.
 22 So I don't really understand your question particularly.
 23 Q. So is it that you assumed that everything being
 24 delivered to site was safe?
 25 A. Yeah.

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1 Q. Right.
 2 Now, I think you said that you didn't do a method
 3 statement. To be clear, does that mean that you didn't
 4 do a risk assessment method statement, an RAMS, for the
 5 site?
 6 A. No, there was one done for the site. There wasn't
 7 one -- what I said was there wasn't one done for the
 8 inspection process.
 9 Q. Forgive me, there wasn't one done for the inspection
 10 process, but you say there was one done for the site?
 11 A. Yeah.
 12 Q. Yes, I see.
 13 At paragraph 13 of your statement {RYD00094221/6},
 14 I think you said -- we don't need to go to it unless you
 15 want to -- that you believe the specialist
 16 subcontractors engaged by Rydon who designed the works
 17 would have been selected for the project from an
 18 approved list held by Rydon. Is that right?
 19 A. Yes.
 20 Q. I think your understanding was that the subcontractors
 21 had to be vetted first before being added to the
 22 approved subcontractor list.
 23 A. Yes.
 24 Q. That's right, is it?
 25 A. Yes.

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1 Q. I don't think you have shown us the approved list. Is
 2 there an actual list, a written document?
 3 A. Yes.
 4 Q. Right.
 5 You were familiar with it at the time, were you?
 6 A. Yeah, I would have been, yeah.
 7 Q. Do you know where it was held in Rydon?
 8 A. It would have been on the RMS.
 9 Q. Right.
 10 Did you yourself personally check that any of the
 11 subcontractors used for the Grenfell Tower project were
 12 on the approved list?
 13 A. No, that would have been done by the surveyor prior to
 14 them being engaged.
 15 Q. The surveyor being who?
 16 A. Adam Marriott, Zak Maynard, I think there was one other
 17 as well, I can't remember the name.
 18 Q. You said Zak Maynard.
 19 A. Adam Marriott, Zak Maynard, there was a few.
 20 Q. Right.
 21 So when you came into the project, did you ask
 22 either Adam Marriott or Zak Maynard or this third, or
 23 fourth person perhaps, whether they had checked that the
 24 subcontractors being used for this project were on the
 25 approved list?

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1 A. I hadn't, but I knew that JS Wright and Harleys had
 2 worked for Rydon on a number of occasions.
 3 Q. Right.
 4 I think you have referred to a vetting process.
 5 What was the vetting process? What did that involve, do
 6 you know?
 7 A. I don't know.
 8 Q. Right.
 9 Did you yourself take any steps to check and ensure
 10 that each of the subcontractors that was chosen by
 11 Harley to work on this project were competent and
 12 suitable for the work that they were to carry out?
 13 A. Chosen by Harley, sorry?
 14 Q. Yes, chosen by -- by Rydon, I'm sorry, you're right,
 15 I said chosen by Harley. I meant chosen by Rydon. I'm
 16 sorry.
 17 A. No.
 18 Q. Would it follow that you, and indeed Rydon, didn't take
 19 steps to check and make sure that each subcontractor or
 20 subconsultant was actually carrying out their
 21 obligations fully, properly and competently?
 22 A. Obligations in what sense, sorry?
 23 Q. Obligations under the contract that each subcontractor
 24 and subconsultant had with Rydon.
 25 A. I would imagine that they would have been. That's why

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1 we was doing our checks.
 2 Q. So the inspection process, is --
 3 A. Yeah.
 4 Q. I see.
 5 Can I then ask you to go back to the NBS
 6 specification, {SEA00000169/69}. This is the
 7 NBS specification part dealing with the rainscreen, H92,
 8 Mr O'Connor. Let's look together at paragraph 235 at
 9 the top of the page:
 10 "Information to be provided" --
 11 SIR MARTIN MOORE-BICK: Mr Millett, I'm not sure this is
 12 part of the rainscreen cladding. I think that may be
 13 a heading which goes on to the next page.
 14 Oh, we have gone on to the next page now, have we?
 15 MR MILLETT: It should be page 69, Mr Chairman.
 16 SIR MARTIN MOORE-BICK: All right, thank you.
 17 MR MILLETT: Just to be clear, H92 I get from the bottom of
 18 the page, Mr O'Connor, "Rainscreen cladding", and it
 19 starts some pages earlier.
 20 SIR MARTIN MOORE-BICK: Yes.
 21 MR MILLETT: 235, "Information to be provided ..."
 22 It then says under that, "Submit the following
 23 cladding particulars", and there are six bullet points:
 24 "- Detailed drawings to fully describe fabrication
 25 and installation .

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1 "- Detailed calculations to prove compliance with
2 design/performance requirements.
3 "- Project specific fabrication , handling and
4 installation method statements.
5 "- Certification for incorporated components
6 manufactured by other confirming their suitability for
7 proposed locations in the rainscreen cladding.
8 "- Recommendations for spare parts for future
9 repairs or replacements.
10 "- Recommendations for safe dismantling and
11 recycling or disposal of products."
12 Now, I've read those all out to you.
13 What processes were in place, so far as you
14 understood at the time, to make sure that Rydon gathered
15 each of those elements of required information and
16 passed those to the TMO?
17 A. I wouldn't -- I wouldn't know, that wouldn't be part of
18 my process.
19 Q. Wouldn't be part of your process; who within Rydon would
20 that fall to?
21 A. That would probably fall to Steve Blake, Simon Lawrence,
22 someone that was part of the design intent.
23 Q. Were you ever asked to provide or obtain detailed
24 drawings to fully describe fabrication and installation?
25 A. I don't believe so.

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1 Q. Were you ever asked to provide any of this information?
2 A. I don't believe so.
3 Q. Let's look lower down the page together, paragraph 342,
4 "Contractor's design of rainscreen generally", and if we
5 look at the second bullet point it says:
6 •" Design Standard: To CWCT 'Standard for systemised
7 building envelopes'.
8 •" Structural and fire requirements."
9 Then they're set out there. Then underneath that,
10 third bullet point:
11 "- Design: Complete the design in accordance with
12 the designated code of practice to satisfy specified
13 performance criteria.
14 •" Functional requirements: As specified in this
15 section, with fire stopping to the requirements of the
16 Building Regulations."
17 Now, did you read that paragraph in the NBS spec at
18 the time, do you think?
19 A. I don't recall.
20 Q. You don't recall, okay.
21 Do you recall seeing at the time any mention of the
22 CWCT standard for systemised building envelopes?
23 A. No.
24 Q. At the time, do you think, had you ever heard of the
25 CWCT standard for systemised building envelopes?

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1 A. At the time, no.
2 Q. So can we take it that you wouldn't have read it?
3 A. No.
4 Q. And you wouldn't be familiar with any of its details?
5 A. No.
6 Q. Right.
7 Had you worked on any other projects where the CWCT
8 standard had been a contractual standard for cladding?
9 A. Not that I'm aware of, no. That was my first cladding
10 project.
11 Q. What about Chalcots?
12 A. I had nothing to do with cladding at Chalcots.
13 Q. Right. You said that earlier, but you don't remember
14 any reference at all to CWCT on Chalcots?
15 A. No.
16 Q. Now, I would just like to ask you then about
17 Building Regulations. As we can see there, there is
18 a reference to the Building Regulations.
19 I know you didn't read this, but at the time and in
20 general terms, as at May 2014, were you familiar with
21 the Building Regulations?
22 A. No, I was aware they were there, but I wasn't familiar
23 in detail, no.
24 Q. You weren't familiar in detail. Let's see how far your
25 familiarity extends.

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1 Were you familiar with schedule 1 to the
2 Building Regulations and something called the functional
3 requirements?
4 A. No.
5 Q. No, so you didn't know about B, fire safety?
6 A. No. At the time, no.
7 Q. No.
8 Was there any system in Rydon to educate project
9 managers about the requirements of the
10 Building Regulations?
11 A. I don't believe so.
12 Q. Right.
13 The next question I suspect will be an obvious one
14 but I feel I do have to ask you: were you familiar at
15 the time with Approved Document B --
16 A. No.
17 Q. -- as forming part of the Building Regulations?
18 A. No.
19 Q. Were you aware of the existence of any industry guidance
20 about external wall construction such as -- and I'll
21 just give you one or two examples -- the Building
22 Control Alliance's Technical Guidance Note 18 from
23 June 2014 and June 2015?
24 A. No.
25 Q. What about the -- all right.

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1 Can we look together at the question of fire risk
2 assessment. I'd like you to go to {RYD00094213}. This
3 is Mr Hughes' witness statement, David Hughes. He is
4 coming to give evidence to the Inquiry next week.
5 I just want to ask you about one paragraph. This is
6 paragraph 106, please, at page 24 {RYD00094213/24}. He
7 says here:

8 "Project Fire Risk Assessments (FRAs) are part of
9 Rydon Group Safety, Health, Environmental & Quality
10 (SHEQ) procedures. The original one would have been
11 done by the Project Manger, Simon O'Connor, at the start
12 of the project on site. Its main focus is how to carry
13 out the contracted works within the site, residential
14 properties, communal and public spaces, and comply with
15 the current regulations. It covers the scope of the
16 works and those that might be affected by those works,
17 including site visitors and residents."

18 I just want to focus on where he says "comply with
19 the current regulations", as you can see there in the
20 second-from-last sentence.

21 Is what Mr Hughes says here a fair assessment of the
22 purpose of project FRAs?

23 A. I wouldn't say it would take into account the current
24 regulations.

25 Q. Right, so he is wrong about that, is he?

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1 A. I'm not saying he's wrong, it's just I would view it
2 differently.

3 Q. How would you view the scope of project fire risk
4 assessments, then, in relation to current regulations?

5 A. So the project fire risk assessment that I did alongside
6 Simon Camps was for the bottom four floors of
7 construction area.

8 Q. So you didn't do a project fire risk assessment for the
9 upper floors?

10 A. There would have been an overall one, which would be
11 a template, but that wouldn't take into account
12 regulations. That would take into account resident
13 interaction probably more than regulation.

14 Q. I see.

15 Do you know who carried out that project fire risk
16 assessment?

17 A. It would probably be myself and Simon Camps.

18 Q. I'm sorry, we may be at cross-purposes. I'm talking
19 about the project fire risk assessment for the rest of
20 the building, including the upper floors, not just
21 the --

22 A. We would have done both, I imagine, but there would have
23 been separate documents.

24 Q. It would have been done by ...?

25 A. We would have done both, but there would have been

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1 separate documents.

2 Q. I see.

3 Let's just see a document, {RYD00032404}, just so
4 that we're clear. This is a Rydon project fire risk
5 assessment dated February 2015, and you can see from
6 page 1 it says:

7 "Initial document completed by: SC/SOC."

8 Is that Simon Camps and you?

9 A. Yes.

10 Q. Is this the document you're referring to, do you think?

11 A. This would probably be the overall one, yes.

12 Q. Let's go to page 2 {RYD00032404/2}, "Project Fire Risk
13 Assessment", and we can see there in the first box:

14 "Responsible person named for the project (Contract
15 Manager or Project Manager): ... Simon O'Connor."

16 So you were the responsible person, weren't you, for
17 this?

18 A. During the construction period, yes.

19 Q. And the risk assessor was Simon Camps?

20 A. Yes.

21 Q. Yes, February 2015.

22 Now if we turn to page 7 {RYD00032404/7}, please,
23 let's look together at that and look at paragraph 4.2 or
24 section 4.2, under the heading "Rapid fire & smoke
25 spread through building". 4.2 says:

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1 "The occupied units within the tower are rated to
2 1 hour fire protection. Existing fire stopping is in
3 place. Where new penetrations are opened they have fire
4 stopping installed by the end of the shift. Where
5 permanent fire stopping is missing Rydon to inform the
6 client immediately."

7 Now, the same words appear, as you can see, under
8 5.3 under the heading "Occupied Premises", and this is
9 under the overall heading, "Fire spread to adjacent
10 properties".

11 Do you see that?

12 A. Yes.

13 Q. So can we take it from this document that you were aware
14 of the need for firestopping on the project?

15 A. I was aware that if we was drilling holes that go from
16 the common parts into the flats, which we was, they
17 needed to be firestopped.

18 Q. Right.

19 Let me ask it this way: you see the word
20 "firestopping"; had you heard of the expression "cavity
21 barriers"?

22 A. Yes.

23 Q. Did you know there to be any difference between
24 firestopping and cavity barriers?

25 A. At the time I wouldn't have classed them -- I wouldn't

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1 have called them cavity barriers, we probably would have
 2 referred to them as firebreaks.
 3 Q. Would there be a difference in your mind at the time
 4 between a firestop and a firebreak?
 5 A. Yes.
 6 Q. What was the difference?
 7 A. A firestop was installed to small areas where, say,
 8 pipes and stuff were cut through in from common parts
 9 into flats, and that would be, I don't know, some sort
 10 of Rockwool intumescent, maybe, performed by a company
 11 that's qualified to do so. A firestop or cavity
 12 barrier, as we're calling them, would be externally,
 13 I believe.
 14 Q. What would fire barriers or cavity barriers be for?
 15 A. Sorry?
 16 Q. What would be their role? What would a cavity barrier's
 17 role be?
 18 A. Compartmentation.
 19 Q. Yes.
 20 Now, can I ask you to go back to page 3
 21 {RYD00032404/3} of this document and look at section 3.
 22 This part of the FRA requires you to assess sources of
 23 fuel and oxygen, doesn't it?
 24 A. Yes.
 25 Q. Now, if we look at page 5 {RYD00032404/5}, this is your

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1 assessment, or yours and Mr Camps' assessment, of
 2 section 3. If we look under "Flammable solids" -- do
 3 you see "Flammable solids" in the middle section there?
 4 A. Yes.
 5 Q. You can see that building materials have not been
 6 ticked. A number of things have been ticked, but
 7 building materials have not been ticked. It's the
 8 second entry from the bottom there. Do you see that?
 9 A. I can see it, yeah.
 10 Q. How did you decide that no building materials presented
 11 a source of fuel?
 12 A. I think the building materials that we was referring to
 13 are bricks, blocks, concrete, things like that.
 14 I wouldn't consider them to be a source of fuel.
 15 Q. No, I just wonder what building materials means in this
 16 context. Does it not include the materials which are
 17 coming on to the building as part of the refurbishment?
 18 A. I don't know.
 19 Q. Did you think about that at the time?
 20 A. No, this would have been -- this would have been a point
 21 in time, so I don't even know if there was materials on
 22 the site at that point, I don't know.
 23 Q. This is February 2015, and whether the materials were
 24 yet on site or not, by this time we know that Celotex
 25 was coming on to site at some point to form the

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1 insulation in the rainscreen system, and ACM
 2 polyethylene core panels were coming onto site to form
 3 the rainscreen as part of that system.
 4 My question is: given those were going to be coming
 5 on, did you think at the time that they should be
 6 accounted for within the expression "building materials"
 7 when conducting this risk assessment?
 8 A. I weren't aware at the time of their combustibility.
 9 Q. No, but that wasn't my question. My question was: given
 10 that those materials were going to be coming on to the
 11 building, did you think at the time that they should be
 12 accounted for within building materials when doing your
 13 risk assessment?
 14 A. No, like I said, I see this as a point in time.
 15 Q. So when you say, "I see this as a point in time", do you
 16 say, "I look at the building as it stands today and look
 17 at what building materials are on site"?
 18 A. I think that's what this is. It's: at this moment, this
 19 is what the risks are, and it gets introduced -- it gets
 20 upgraded as and when things move on.
 21 Q. So this is a snapshot, is it, as at the date --
 22 A. That's what I understand.
 23 Q. So do we take it from that that you didn't at the time,
 24 at least, of this report think that the cladding
 25 materials coming on to source was not a source of fuel?

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1 A. I didn't believe they was, no.
 2 Q. Did you actually think about that at the time?
 3 A. I don't recall, to be honest.
 4 Q. All right.
 5 Did you make any investigations, either at this time
 6 or when this was later updated, to make sure that the
 7 building materials that did come on to site, and
 8 particularly the insulation and the rainscreen
 9 materials, didn't present a source of fuel?
 10 A. I don't recall.
 11 Q. Right.
 12 How often was this document updated, do you know?
 13 A. I don't know. I can't -- I'm not going to say monthly,
 14 I'm not going to say weekly, I don't know.
 15 Q. You don't know.
 16 How much work went into producing a project fire
 17 risk assessment like this?
 18 A. A fair amount, between me and Simon.
 19 Q. What did you do to do it?
 20 A. Walked the site.
 21 Q. I see.
 22 So, just help me, in terms of the process, you
 23 walked round site with a clipboard, and do you tick it
 24 off while you're going? It looks like it's done on a --
 25 A. We would have had a --

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1 Q. -- template.
 2 A. Yeah, this would have just been a template, and we would
 3 have had a hard copy with us, and it would probably just
 4 be a tick exercise, as you can see, and -- yeah, that's
 5 kind of how it was put together.
 6 Q. Right.
 7 When asking the question, "What are building
 8 materials?" in that middle column there, how do you work
 9 out what's on site so that you can tick or untick that
 10 box accordingly?
 11 A. Well, we was walking around site, so ...
 12 Q. If there was a material which comes on to site you
 13 didn't know, never seen before, or which wasn't commonly
 14 used, such as ACM PE rainscreen, as you told us you
 15 didn't think was commonly used, what would you do to
 16 satisfy yourself that it didn't present a source of
 17 fuel?
 18 A. I don't recall, to be honest.
 19 Q. All right.
 20 If you were presented with a material you had never
 21 seen before, you don't know what it is, but you have got
 22 your clipboard in front of you and you're trying to work
 23 out: does this present a source of fuel, how would you
 24 go about finding that out?
 25 A. In hindsight, you would probably go and google it.

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1 I can't say I did that.
 2 Q. Right.
 3 Now, turning to a slightly different question, can
 4 I ask you to turn to {RYD00043746}. This is an email
 5 from Claire Williams to you dated 10 April 2015. I'll
 6 just wait for it to come up so we can see it together.
 7 (Pause)
 8 There it is. Claire Williams, 10 June 2015, 16.39,
 9 to you:
 10 "URGENT URGENT URGENT: Grenfell FRA- outstanding
 11 items."
 12 She says -- and this is the second email down,
 13 17.19:
 14 "Simon
 15 "I have gone back through the list, and need just a
 16 few more bits."
 17 If you look at the bottom of the page, under item 5,
 18 she says:
 19 "I would recommend that the contractor provides ..."
 20 Then she sets out, I think, four things, and they go
 21 over the page {RYD00043746/2}:
 22 "1. The scope of works covering how this
 23 cladding(sic)? How will the cladding be fixed to the
 24 building?
 25 "2. What fixings will be used?

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1 "3. The fire rating of the cladding and the
 2 fixings?
 3 "4. The Building Control Officers acceptance of
 4 this fixing system and the cladding used?"
 5 Now, we have been unable to locate any response to
 6 this request from you. Do you think you did respond?
 7 A. I probably would have forwarded this on to someone that
 8 could answer them questions.
 9 Q. Let's go back to the first page {RYD00043746/1} and the
 10 email after this. You see she sends you this email on
 11 10 April 2015 at 17.19, and then she sends an email on
 12 10 June 2015 to you, "URGENT URGENT URGENT":
 13 "Simon
 14 "I think you could polish this off quickly, don't
 15 you?
 16 "See you at 9.30 tomorrow."
 17 Can you remember what happened between April 2015
 18 and June 2015 so as to prompt her to ask you to polish
 19 this off quickly?
 20 A. I don't recall.
 21 Q. It looks from this as if you didn't answer her questions
 22 in the two months or so between 10 April and
 23 10 June 2015. Would that be right?
 24 A. I can't -- I can't answer, I don't know.
 25 Q. When she asked you to polish this off quickly, do you

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1 remember what you did?
 2 A. No.
 3 Q. Now, she says, just going back to the top of page 2
 4 {RYD00043746/2} under item 3, "The fire rating of the
 5 cladding and the fixings?", that's what she wants to
 6 know about.
 7 Did you ever investigate those matters, the fire
 8 rating of the cladding and the fixings?
 9 A. No, like I said, I would probably have forwarded this on
 10 to someone who was competent to answer the question.
 11 Q. Who would you have forwarded that to, to answer the
 12 question?
 13 A. Probably Neil Crawford.
 14 Q. You don't remember doing that, do you?
 15 A. I don't remember doing it, but that's what I would
 16 generally do if I got a question I couldn't answer:
 17 I would forward it on to someone who could.
 18 Q. Right. See, we haven't been able to find a response
 19 either to the April email or the June email or any
 20 forwarding by you of these emails on. Can you explain
 21 that?
 22 A. I can't.
 23 Q. No.
 24 I would like to ask you some questions next about
 25 Celotex. Can we go, please, to {RYD00039499}. This is

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1 an email from you to Simon Lawrence of 22 April 2015,
 2 which we looked at with Mr Lawrence when he was here
 3 giving evidence, and it says:
 4 "Si
 5 "The insulation type is as follows:
 6 "Celotex RS5080
 7 "Aluminium foil facing
 8 "Class) (BS476), BS8414-2:2005
 9 "PU EN 9165 2012
 10 "Warehouse:
 11 "Celotex ... Ipswich ...
 12 "Regards
 13 "Simon O'Connor ...
 14 "Project Manager."
 15 Do you remember the circumstances in which you sent
 16 this information to Mr Lawrence?
 17 A. I don't.
 18 Q. Do you know where you got the information from that you
 19 were passing on to him in this email?
 20 A. I probably copied and pasted it from somewhere. It
 21 doesn't look like the sort of thing I would write or
 22 know.
 23 Q. Just to help you, this isn't in the NBS specification
 24 where one would expect to find it, namely page 73
 25 {SEA00000169/73}. We don't need to look at that.

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1 So you say you would have copied and pasted it from
 2 somewhere; do you know or can you remember even roughly
 3 where you would have cut and pasted it from?
 4 A. I don't, to be honest.
 5 Q. Do you know or can you remember why you sent this
 6 information to Mr Lawrence?
 7 A. I would imagine he would have asked me a question. It's
 8 not the sort of email I would just send to him for no
 9 reason.
 10 Q. Do you know what BS 476 is?
 11 A. Then, at that time, no, I didn't.
 12 Q. Right. Did you know what BS 8414 was?
 13 A. At that time, no.
 14 Q. Did you understand there to be any difference between
 15 RS5000 and RS5080?
 16 A. I don't -- I don't recall at all.
 17 Q. You can't really help us about any --
 18 A. I can't recall this email at all and it doesn't look
 19 like something I would write.
 20 Q. Do you recall, even in general terms, getting into the
 21 specifics of the specifications for insulation material?
 22 A. No, not particularly, no.
 23 Q. Not particularly; at all?
 24 A. I don't -- I don't believe so.
 25 Q. All right.

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1 Can we look at {RYD00042091}. This is an email from
 2 Simon Lawrence to you, Mr O'Connor, and Danny Osgood of
 3 20 May 2015, and you can see the subject matter is
 4 "Grenfell - Rainscreen EWI funding", and there is
 5 an attachment, "rs5000 productdatasheet mar 15.pdf".
 6 You see that?
 7 A. I do.
 8 Q. He says:
 9 "Gents
 10 "Please see my response below to the Client Energy
 11 funding Broker."
 12 You can see the rest of what he says there. The
 13 topic, just to put this in its context, is obtaining
 14 funding, essentially green funding.
 15 The email below it is from Simon Lawrence to
 16 David Brissenden of 20 May, the same day, earlier in the
 17 day, in relation to EWI funding.
 18 Do you remember whether you read or opened the
 19 product datasheet when you received this?
 20 A. I don't recall opening it, no.
 21 Q. Can we look at it, it's {RYD00039507}. Did you read
 22 this document at the time?
 23 A. I don't recall reading it, no.
 24 Q. Leaving aside Mr Lawrence's email of 20 May 2015, did
 25 you ever read this document while you were involved in

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1 the Grenfell Tower project?
 2 A. I don't recall reading it, no.
 3 Q. Did you ever ask for it?
 4 A. I wouldn't imagine so.
 5 Q. It says in the pink strapline at the very top of the
 6 document "Suitable for buildings above 18 metres in
 7 height". I know you say you didn't read this at the
 8 time; did anybody ever tell you positively that this
 9 material, Celotex RS5000, was suitable for buildings
 10 above 18 metres in height?
 11 A. It wouldn't have even crossed my mind because, you know,
 12 I would have presumed everybody, all the specialists,
 13 had gone through this.
 14 Q. Right.
 15 Did you or anybody else at Rydon to your own
 16 knowledge at the time talk directly to Celotex about
 17 whether the insulation material from Celotex was
 18 suitable for this project?
 19 A. I don't remember talking to Celotex at all, and I don't
 20 know if anybody else did.
 21 Q. I want to ask you some questions about a different
 22 insulation product: Kingspan Kooltherm K15.
 23 Have you heard of that product?
 24 A. Yes.
 25 Q. Had you heard of it at the time?

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1 A. I had heard of Kingspan, but I wouldn't have put the K15
2 behind it .
3 Q. Right, okay.
4 If we can go back to the email that we were looking
5 at a minute ago which Mr Lawrence sent to you and
6 attached the datasheet. It is {RYD00042091}.
7 He says there to both of you, you and Mr Osgood, in
8 the last two lines :
9 "Can you also ensure the attached External Works
10 Inspection sheet is used? Obviously you'll need to add
11 to the checklist comments."
12 Did you understand from this that you needed to make
13 sure that external works inspection sheets like the one
14 that's attached were filled in?
15 A. No, I think that comment would have been aimed at
16 Daniel, not me.
17 Q. Oh, I see.
18 Let's have a look at the checklist. It's
19 {RYD00042087}. If you look at the fourth tick box.
20 It's not really a tick box itself, it's an entry. You
21 can see that it says, "Check correct product is [used]",
22 yes/no. Do you see that?
23 A. Yep.
24 Q. What tells you, or Danny Osgood, for that matter,
25 whether the product is correct?

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1 A. The branding, I imagine.
2 Q. The branding. Where would you get that from?
3 A. On the actual insulation board.
4 Q. What would you check the actual product against to make
5 sure it was correct?
6 A. Against the drawings.
7 Q. Against the drawings?
8 A. Because the drawings would be annotated, wouldn't they?
9 Q. Would the drawings you saw be annotated with specific
10 product information?
11 A. I can't recall if they actually were, but that's general
12 building ...
13 Q. When the documents of this nature were filled in, as per
14 Mr Lawrence's instruction, who was responsible for
15 actually putting pen to paper and ticking the boxes?
16 A. Whoever was checking --
17 Q. Who would that have been?
18 A. This is externals, it would be one of the external
19 managers, Daniel or whoever else was looking after the
20 external at the time.
21 Q. Just to be clear about your use of the word "external",
22 I think you don't mean external to Rydon, you mean
23 external on the site?
24 A. The external façade, yeah.
25 Q. External façade?

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1 A. Yeah, yeah.
2 Q. So to answer my question, I think you mean the site
3 managers responsible for that part of the project
4 dealing with the exterior?
5 A. Yes.
6 Q. Right, and they were answerable to you; yes?
7 A. Yes.
8 Q. You were their line manager?
9 A. Yes.
10 Q. So what did they do physically when ticking the "yes" or
11 "no" box in respect of a particular product that comes
12 in to make sure that it was or wasn't correct?
13 A. They would be out looking at the actual work installed,
14 I would imagine.
15 Q. But what documents in Rydon's possession did they look
16 at to check whether it was correct or not?
17 A. Like I said, it would be drawings.
18 Q. Nothing else?
19 A. Possibly the NBS spec as well, but I can't -- I can't
20 recall if that was the case or not.
21 Q. Right.
22 Is it fair to assume that at least from
23 20 May 2015 -- well, let me ask, actually, a prior
24 question.
25 We see this attached to Mr Lawrence's email of

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1 May 2015; was this format, quality control list, in
2 operation at Rydon on this project before May 2015, or
3 was this the first time that it was being used, on and
4 from 20 May?
5 A. It doesn't look like a document that I've seen before.
6 Q. Does that mean that you can't help me with my question?
7 A. Yes.
8 Q. Right.
9 Did you ever come across an occasion when you saw
10 a quality control checklist, either in this form or any
11 other form, that said that an incorrect product had been
12 installed or had arrived?
13 A. I don't recall, to be honest.
14 Q. Right.
15 At what stage in the ordering and physical arrival
16 and installation process did this checklist intercept
17 incorrect products being used?
18 A. I would say at the time of the work being offered to us,
19 because the subcontractors would order the materials and
20 they would be delivered to site. Like I already said
21 earlier, they wouldn't particularly have been checked by
22 a Rydon manager. We was using trusted, and, you know,
23 tried and tested contractors. There was a bit of trust
24 there.
25 Q. When you say the work being offered to us, what does

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1 that mean?
 2 A. Offered to us for snagging.
 3 Q. Offered to you for snagging?
 4 A. Well, not snagging but, you know, like inspection at
 5 certain points.
 6 Q. I see.
 7 Let's just look at the rest of this, because there
 8 is a context on the document.
 9 The other things to be checked are setting out. Is
 10 that correct? What's setting out?
 11 A. It means if the rails need to be -- sorry, if the rails
 12 need to be 400 centres, then he would look at the
 13 drawing, it would tell him that the rail should be 400
 14 centres. He'd put a tape on it. If it was 400 centres
 15 then the setting out is correct.
 16 Q. Right. Then, "Check fixings are installed according to
 17 manufacturer's guidelines and design"?
 18 A. So he would have the drawing in front of him, and it
 19 would say, maybe, I don't know, four screws per bracket,
 20 and then he would count the screws per bracket.
 21 Q. Yes, I see. Then you have, "fixing pull test (if
 22 appropriate)" and "Check correct product is installed".
 23 It looks as if from this document, and from what you
 24 are saying as well, that this quality control checklist
 25 would only be used after installation?

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1 A. Yes.
 2 Q. Yes, I see.
 3 Were there any checks made in the process any
 4 earlier on, either at the ordering stage or the delivery
 5 stage, about whether the correct product is coming on to
 6 site and being installed?
 7 A. I don't believe so.
 8 Q. Were you aware that Kingspan Kooltherm K15 insulation
 9 was used on Grenfell Tower as well as Celotex RS5000 as
 10 an insulation product?
 11 A. I wasn't then, no.
 12 Q. You weren't?
 13 Now, were you aware that Kingspan -- well, you
 14 wouldn't have been aware, I think, that Kingspan
 15 Kooltherm K15 was ordered in May 2015 and delivered in
 16 June 2015 to site.
 17 A. I wouldn't have been aware of that, no.
 18 Q. Right.
 19 You see, we can't find any record of that product
 20 being installed and as different from the specified
 21 insulation product. Can you explain to us why that is?
 22 A. I don't know why. Are you asking why it was installed
 23 or why it was brought to site, or ...
 24 Q. Well, I'm asking you why it was brought to site, first
 25 of all.

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1 A. I don't know.
 2 Q. We know it was installed but we don't find a quality
 3 control checklist saying "Incorrect product is
 4 installed" in relation to K15. Can you explain why that
 5 is?
 6 A. I can't, no.
 7 Q. Now, I know you don't know when it arrived or even
 8 whether it arrived, but who at the time was responsible
 9 for overseeing the order and delivery of K15? So this
 10 is May/June 2015.
 11 A. It would have been the subcontractor.
 12 Q. Do you know how and where it was installed on site prior
 13 to installation?
 14 A. No.
 15 Q. Do you know anything about the process for calling that
 16 material off from where it was stored on site so that it
 17 could go on to the building?
 18 A. When you say calling it off, what do you mean?
 19 Q. Taken off a pile and put on the building.
 20 A. It wouldn't be a process; it would just be people
 21 picking it up and putting it on a mast climber.
 22 Q. Who oversaw that physical process?
 23 A. That would have been Ben Bailey.
 24 Q. So Harley?
 25 A. Yes.

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1 Q. Anybody at Rydon on site supervising that process at the
 2 time?
 3 A. Yeah, I mean, there would have been a manager going
 4 around the building on a daily basis. So, yeah, I mean,
 5 I would expect it to be picked up if it was there.
 6 Q. I see. So somebody from Rydon would have seen K15
 7 arriving and being installed?
 8 A. Quite possibly, yes.
 9 Q. I'm putting that to you, I'm asking you: is that
 10 correct?
 11 A. Yes, I suppose they would have done, yes.
 12 Q. Was there anybody from Rydon ensuring that the
 13 manufacturers' installation guidelines, whether for K15
 14 or indeed any other product, were complied with?
 15 A. That would have been part of the snagging process,
 16 I imagine.
 17 Q. But from Rydon's perspective, nobody before that stage?
 18 A. Well, we can't inspect it if it's not been installed,
 19 because you just ask if the installation process ...
 20 Q. Was anybody from Rydon present on site and supervising
 21 the subcontractors' installation and making sure that
 22 the installation was in accordance with the
 23 manufacturers' installation guidelines?
 24 A. Probably not, but at snag stage they would have checked
 25 the fixings.

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1 Q. I see.
 2 A. Because we can't look at things when they're half
 3 finished, you know, we have to look at them when they're
 4 complete.
 5 Q. Can you tell us what stage the installation of the
 6 insulation had got to in May or June 2015?
 7 A. I couldn't.
 8 Q. Do you know whether there were any records kept of where
 9 the Kingspan Kooltherm K15 insulation was installed on
 10 the building?
 11 A. I didn't know it was, so no.
 12 Q. No.
 13 What I'm really trying to get to the bottom of is
 14 whether there was any Kingspan K15 around flat 16 on the
 15 eastern elevation of the tower.
 16 A. I don't believe -- I don't believe I was there when it
 17 got that low. It was quite high when I, you know, left.
 18 Q. When you left, where had it got down to?
 19 A. I can't recall.
 20 Q. Okay.
 21 A. I think it's in my statement, but I can't recall.
 22 Q. Now, you tell us in your statement that your role
 23 on site as project manager included managing the
 24 day-to-day running of the project -- that's
 25 paragraph 3 -- and monitoring the sequencing of the

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1 works, as well as subcontractor efficiency; yes?
 2 A. Yes.
 3 Q. You also say monitoring when materials were arriving
 4 on site. That's paragraph 15 of your statement.
 5 A. Yes.
 6 Q. You stand by that, do you?
 7 A. Yes.
 8 Q. How did you monitor the arrival of materials on site?
 9 A. Because they were booked in with the marshal on the
 10 front, and the idea of them booking them in was so we
 11 didn't have a road full of big lorries. It was more
 12 logistics than what was actually coming.
 13 Q. Right. In your statement, to be fair to you, you do say
 14 that it's from a logistics and programming perspective.
 15 A. Yes.
 16 Q. So your monitoring was limited to timing of arrival of
 17 lorries and where you were going to put them?
 18 A. Yeah, I mean, it was a small dead-end road, so we could
 19 only have one at a time. So it was a matter of booking
 20 them in logically.
 21 Q. Right.
 22 How did you actually monitor the arrival of
 23 materials on to site?
 24 A. It was done by the marshal at the front. So he would
 25 record -- they would be booked in, I think, maybe

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1 48 hours in advance, and there would be time slots.
 2 Q. I see. And the marshal, was he or she a Rydon person or
 3 a Harley person?
 4 A. They were agency.
 5 Q. Who were they?
 6 A. What was the name?
 7 Q. Yes.
 8 A. I can't remember.
 9 Q. All right.
 10 How did you monitor the programming and sequencing
 11 of materials arriving on to site?
 12 A. I personally wouldn't have oversaw that, that would be
 13 the managers that were looking after the areas. So
 14 during the meetings with the subcontractors they'll be
 15 saying, you know, "Deliveries need to be more timely" or
 16 "You need to give us more notice of delivery",
 17 you know ...
 18 Q. Would you describe your role as including
 19 a responsibility to ensure that sufficient quantities of
 20 materials were on site in order for the works to stick
 21 to programme?
 22 A. It wouldn't be my responsibility to make sure the
 23 quantities are on site; it would be my responsibility to
 24 make sure the subcontractors are ordering in a timely
 25 fashion.

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1 Q. How would you go about discharging that responsibility?
 2 A. Well, when the weekly/monthly meetings would go, would
 3 happen with the subcontractors and the managers, they
 4 would ask about materials on site, and when your next
 5 delivery is, and is that quick enough, do you have
 6 enough men, you know.
 7 Q. Would it be your job to know what products or materials
 8 were arriving at site and where they were going to go on
 9 the building?
 10 A. No.
 11 Q. Whose job was that?
 12 A. The various managers.
 13 Q. When you say various managers, who --
 14 A. The external manager, or the -- it depends on what was
 15 being delivered. So if we are talking externally, then
 16 yeah, it would be one of the external managers. They
 17 would make sure there was enough room for the materials
 18 to come in, for one, because it was a very tight site.
 19 Q. So that was a Rydon person --
 20 A. Yes.
 21 Q. -- for whom you were responsible?
 22 A. Yes.
 23 Q. Yes.
 24 When you were supervising their work, in that
 25 respect, what did you do?

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1 A. What do you mean?
 2 Q. Well, your job was to supervise their work to make sure
 3 that the right products arrived and went on to the right
 4 point on the building.
 5 A. I don't quite follow where you're going, sorry.
 6 Q. You see, you have got external managers, who you told us
 7 knew what products were arriving at site and where they
 8 were going, and my question is: what did you do to
 9 supervise them or monitor them?
 10 A. It wasn't my job to supervise what materials come to
 11 site. That was what the managers were doing. And
 12 I think the drawings tell you where the material's
 13 going.
 14 Q. You say it was for the managers to do, and my question
 15 is: what did you do to supervise and make sure that the
 16 managers were getting it right?
 17 A. I could tell by the quality checks, I could tell by the
 18 clerk of works inspections. If they weren't getting it
 19 right, then I would be getting reports back from
 20 Building Control and, you know, clerk of works saying,
 21 "This isn't correct", which ...
 22 Q. Was it your job to stay in close communication with the
 23 relevant subcontractor about the supply of products
 24 coming on to site?
 25 A. No.

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1 Q. Again, whose was that? Was that the external site
 2 managers again?
 3 A. Yeah, one of the managers, yes.
 4 Q. Who did you or they, perhaps, liaise with at Harley,
 5 specifically Harley, in respect of cladding materials
 6 arriving on site?
 7 A. It would be probably Ben Bailey and Ray Bailey.
 8 Q. And who was it who liaised with them about that
 9 matter --
 10 A. It would have been --
 11 Q. -- at Rydon?
 12 A. The external manager again.
 13 Q. Can you give me a name, perhaps?
 14 A. Probably Daniel Osgood, but it depends on the timings of
 15 when you're talking about.
 16 Q. Specifically -- you're quite right, that was a general
 17 question. Let me ask it again in a specific timeframe:
 18 May/June 2015.
 19 A. It would have been Daniel Osgood, I would imagine.
 20 Q. If there was a problem with a delivery or lead times
 21 were strained and there was pressure, would you have
 22 been the contact point for the subcontractors?
 23 A. That would probably have been Simon because he had
 24 a better relationship with them, or a more detailed
 25 relationship with them.

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1 Q. Simon Lawrence?
 2 A. Yeah, he had worked with them on numerous projects;
 3 I hadn't.
 4 Q. Right.
 5 So given your answers in relation to the site
 6 managers and what they would do, did the site managers
 7 have product-specific knowledge so that they could make
 8 sure that what was coming on to site --
 9 A. They would be aware of what should be going on because
 10 they would have the drawings.
 11 Q. Right, okay.
 12 A. I don't think they would have specific -- like, each
 13 delivery wouldn't say, "This lorry is carrying this", it
 14 would just be a time slot.
 15 Q. But your evidence is that it would be the drawings that
 16 would give them the information against which they could
 17 cross-check the materials coming on to site?
 18 A. Yeah.
 19 Q. But nothing other than the drawings?
 20 A. Probably the spec as well, but the drawing would
 21 generally be quite detailed.
 22 Q. Okay.
 23 Did Ben Bailey or anybody else at Harley for that
 24 matter tell you in May 2015 that there was a delay in
 25 the delivery of Celotex RS5000?

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1 A. I don't recall that, no.
 2 Q. Right, you didn't get wind of that. Right.
 3 Were you consulted at all about the delay in the
 4 supply chain in relation to insulation at that time?
 5 A. I don't recall, but they would have gone straight to
 6 Simon Lawrence, not to me.
 7 Q. Right.
 8 Can you give us an idea of how behind the project
 9 was at this point?
 10 A. In June, sorry?
 11 Q. Yes, in May or June 2015. Late May, early June.
 12 A. Possibly nine weeks.
 13 Q. Right.
 14 A. That was conservative as well, but approximately
 15 nine weeks.
 16 Q. Yes.
 17 Is it fair to say that at that point -- late
 18 May/early June -- time was pretty critical, days
 19 counted?
 20 A. I think the whole time was critical, yeah.
 21 Q. Yes.
 22 Now, we have looked at a specific time slot for K15.
 23 Are you aware from your recollection whether there was
 24 any other occasion when Kingspan Kooltherm K15 was
 25 ordered as a substitute for Celotex RS5000?

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1 A. No.
 2 Q. Now, I take it from your answers that you have given me
 3 this morning already about Kingspan K15 that you didn't
 4 know anything about the specification and specifically
 5 its fire performance; is that right?
 6 A. That's right.
 7 Q. So you never got to see any of the spec for that
 8 material or any of the certificates?
 9 A. I don't recall seeing any certificates about material,
 10 no.
 11 Q. Right.
 12 Did you ever see something called a Kingspan
 13 declaration of performance?
 14 A. At the time, no.
 15 Q. No.
 16 Let me just put this to you and ask you who would
 17 have done: it's {SIG00000003}. This is the declaration
 18 of performance produced by Kingspan for Kooltherm K15,
 19 and here is, to put it generally, a lot of technical
 20 detail about this product.
 21 Did you ever see this document?
 22 A. No. I don't recall seeing it, but I'm going to say no.
 23 Q. Would anybody, to the best of your recollection, at
 24 Rydon have seen this document, do you think?
 25 A. Probably Simon Lawrence.

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1 Q. Simon Lawrence, right, okay.
 2 We have already been over the question of approvals
 3 for substituted products; did you understand at the time
 4 that if a product was going to be changed, then Rydon
 5 had to get the permission from the TMO before
 6 substituting one product for another?
 7 A. I don't just think it was the TMO, I think it would be
 8 Studio E as well as lead architects.
 9 Q. Yes.
 10 Do you remember any occasion when, so far as you
 11 remember, Rydon did go to the TMO or Studio E and ask
 12 for permission before substituting K15 for RS5000?
 13 A. No.
 14 Q. If a decision had been made by -- well, let me ask it
 15 this way: whose decision in the chain of command would
 16 it have been to make the substitution from RS5000 and
 17 instead have K15?
 18 A. Well, I think the change would need to be put forward to
 19 the architect.
 20 Q. Yes, but whose decision would have been made initially,
 21 then?
 22 A. Probably Harley would have put it to someone like
 23 Simon Lawrence, who would have then put it to Harley.
 24 Q. I see. You say Harley would have put it to
 25 Simon Lawrence, who would have put it to Harley, so does

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1 it go round in a circle?
 2 A. Harley would have put it to Simon Lawrence, sorry, and
 3 Simon Lawrence would have put it to Studio E.
 4 Q. Oh, to Studio E. Right, okay.
 5 A. Sorry.
 6 Q. So to the best of your understanding, any change of
 7 material would have been signed off by Studio E, I think
 8 that's what you are telling us?
 9 A. Yeah, I think Studio E and the TMO as the client.
 10 Q. Do you remember any occasion in which you became
 11 involved in the question of substituting one product for
 12 another on this project?
 13 A. Not particularly. I mean, there was -- not
 14 particularly, not that any stands out.
 15 Q. Right.
 16 Do you have any recollection about whether
 17 Building Control were told that Kingspan Kooltherm K15
 18 had been proposed as an alternative insulation product
 19 to the RS5000?
 20 A. I wouldn't be able to comment, I don't know.
 21 Q. I now want to ask you some questions about infill
 22 panels. When I say infill panels, does that mean
 23 anything to you?
 24 A. It's the panel that infills between the windows, is that
 25 what you're referring to?

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1 Q. Yes, between the windows and above the cladding spandrel
 2 panels, that's what I'm going to be asking you about.
 3 Can I ask you to turn to {HAR00003951}, please.
 4 This is an email dated 6 March 2015 from Neil Crawford
 5 to Paul Hanson, and it's copied to John Hoban. They're
 6 both RBKC Control. It also goes to Simon Lawrence at
 7 Rydon and you, Simon O'Connor. Do you see that?
 8 A. Yep.
 9 Q. If you look at the top of the page, you can see that
 10 Mr Crawford has attached a number of drawings.
 11 When you got this email, do you remember or do you
 12 think that you would have opened it, opened the
 13 attachments?
 14 A. Quite possibly. Is it possible to see one of the
 15 attachments, or --
 16 Q. I'm going to show you one of them. If you go, please,
 17 to {HAR00003953}, one of these drawings was an elevation
 18 drawing.
 19 Now, this is a Harley drawing authored by
 20 Kevin Lamb, as you can see from the box second from the
 21 right and the smaller box on the left, drawn by KVL. Do
 22 you see that? There is a little lamb picture in the
 23 box, so we can see that it's Kevin Lamb.
 24 A. I do, yeah.
 25 Q. It's marked "Approved for construction", but there is no

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1 Studio E stamp on it.
 2 I want to zoom in with you to the left-hand side of
 3 the window arrangement, if we can, please, because you
 4 will see there there are two areas of the infill panel
 5 which are identified. The first one is a large hatched
 6 area. Can you see that?
 7 A. Yeah.
 8 Q. That's got, although it's not terribly clear on the
 9 screen, a P1 in the corner.
 10 A. Yeah, I can see that.
 11 Q. Can you see the P1?
 12 A. Yeah, I can see it.
 13 Q. Can you confirm that that is the panel that sits between
 14 the windows of the kitchen and the bedroom in this
 15 particular arrangement?
 16 A. I don't know if that's the bedroom, but it's a panel
 17 that sits between them two windows, yes.
 18 Q. All right, and that's what we call the infill panel.
 19 There is a second, smaller hatched area on the
 20 left-hand side beyond the window, and above the smaller
 21 window, which has P2 in the top left corner. Can you
 22 see that?
 23 A. I can.
 24 Q. Is that the panel within the window itself which housed
 25 the kitchen extract fan?

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1 A. Yes.
 2 Q. Do you remember reviewing this drawing particularly when
 3 it came to you in the pack which we have seen attached
 4 to the email?
 5 A. No.
 6 Q. Do you remember whether you made any investigations into
 7 which materials made up P1 and P2, these infill panels
 8 in these two separate locations?
 9 A. No.
 10 Q. We don't need to go back to the email, but Mr Crawford
 11 also attached to the email we looked at a document
 12 called "Specification notes" and I'd like to look at
 13 that with you. That's {HAR00003955}.
 14 Again, just to help you with the origins of this
 15 document, it's again authored by Kevin Lamb, it's dated
 16 15 January 2015, if you look at the bottom right-hand
 17 corner of the document. In fact, this one is a slightly
 18 later revision. If you look at the box on the left,
 19 it's revision A of 3 March 2015. Can you see that?
 20 A. I can.
 21 Q. So this is, I think, what comes to you as attached to
 22 that email.
 23 Do you remember looking at this document?
 24 A. Not specifically, no.
 25 Q. Not specifically in the context of that email, or not at

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1 all?
 2 A. It doesn't -- I'm not looking at it thinking,
 3 "I remember this".
 4 Q. So you don't remember this document at all from your
 5 involvement on the project?
 6 A. No.
 7 Q. Right.
 8 A. Not that I recall.
 9 Q. All right.
 10 Let's see how far we get, then.
 11 If you look at the left-hand column, about halfway
 12 down, can you see that it says, "Glazing - P1 - Panels"?
 13 Can you see that?
 14 A. I can.
 15 Q. Can you see that the outer is 1.5 aluminium skin, and
 16 then the core is 25 millimetres of styrofoam?
 17 Now, is styrofoam familiar to you as a product?
 18 A. Yes, it is now.
 19 Q. It is now; was it a familiar product to you then?
 20 A. Not really, no.
 21 Q. Did you know that it was a trading name for extruded
 22 polystyrene or XPS?
 23 A. No.
 24 Q. Had you come across extruded polystyrene as
 25 an insulation material in your experience as at this

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1 time?
 2 A. As at this time?
 3 Q. Yes.
 4 A. No.
 5 Q. As at March 2015.
 6 A. No.
 7 Q. No.
 8 Immediately below what we have just been looking at,
 9 we can see "Glazing - P2 - Panels", and then again outer
 10 1.5 millimetres aluminium skin, and then core
 11 25 millimetres Kingspan TP10 rigid insulation.
 12 Had you at that stage come across Kingspan TP10
 13 rigid insulation?
 14 A. Like I've said, I was aware of the trade name Kingspan,
 15 but I wouldn't have been able to give you a TP10
 16 reference.
 17 Q. Did you know that that was an insulating product for use
 18 on the external surface of a building?
 19 A. I knew it was used for insulating buildings. I didn't
 20 know the ins and outs of it.
 21 Q. Okay.
 22 Can we then look at a different document, which is
 23 {HAR00002477}. This is an email from Ben Bailey to
 24 acp@panelsystems.
 25 Do you know who Panel Systems were?

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1 A. ACP, Panel Systems, no.
 2 Q. Right. Okay.
 3 Now, you don't get this email at the time, so I'm
 4 not going to ask you about the detail of it. I just
 5 want to ask you about the attachment to it.
 6 You can see that he attaches a purchase order,
 7 that's, "PO113-C1059" -- that's Grenfell --
 8 "Panel Systems - Curtain Wall Panels.pdf".
 9 We can find that purchase order at {HAR00000445}.
 10 The date of the purchase order is 10 September 2015.
 11 I think by this time, is it right you had already left
 12 the project?
 13 A. Yes.
 14 Q. Did you know that Harley Curtain Wall had gone into
 15 administration by this stage?
 16 A. I knew via another member of staff, yes.
 17 Q. Right.
 18 A. I actually didn't know they had gone into
 19 administration. I knew they had problems.
 20 Q. Right, okay.
 21 I know you had left the site at this time, but do
 22 you know who had taken over responsibility at the site
 23 for monitoring the purchase order process?
 24 A. That process would always be a surveyor.
 25 Q. Right.

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1 Now, I just want to see if you can help, and I know
 2 you had left at this time, and it may be that you can't,
 3 but if you go to page 6 {HAR00000445/6} of this
 4 document, we can see a schedule of panels, P2, P3, P4
 5 and P5, where we can see that they are all Kingspan --
 6 well, P2, P3, P4 are Kingspan TP10 rigid insulation.
 7 In fact, our experts have found from their site
 8 inspections after the fire that the panels used at P2
 9 did not have a Kingspan TP10 core but a styrofoam core.
 10 Are you able to shed any light on why that might be?
 11 A. No, as I say, I wasn't at the project then and
 12 unfortunately, no, I can't help.
 13 Q. Did you leave the project before the P2 panels that had
 14 been delivered were checked to make sure that they were
 15 formed of the right product in accordance with
 16 specification?
 17 A. I'm unsure whether I was gone by then or not, if I'm
 18 honest.
 19 Q. Right.
 20 Can I ask you to look at a document which tells us
 21 a little bit about Rydon's relationship with Exova. I'm
 22 going to turn to that topic, I think, quite briefly.
 23 It's {RYD00017870}. This is a set of minutes of the
 24 second progress meeting, or progress meeting number 2,
 25 on 19 August 2014. We can see that you were present,

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1 and Simon Lawrence was not, but these minutes were for
 2 his information.
 3 Were you there in his place, do you think?
 4 A. No.
 5 Q. You were there, though, weren't you?
 6 A. Yeah, I was there, yes.
 7 Q. Right.
 8 If we go through it, we can see various references
 9 to SL. 1.1 is the first one, while we have it there.
 10 This is under "Minutes of Previous Meeting", and you can
 11 see in the second line:
 12 "SL confirmed that the decision will have no
 13 implication on programme and is required by early
 14 October."
 15 Should we read, instead of "SL", "SOC"?
 16 A. No.
 17 Q. Because he wasn't there, so he couldn't have done
 18 anything or said anything.
 19 A. He would have forwarded anything he needed to answer to
 20 probably Zak.
 21 Q. Right.
 22 Let's just turn the page, then, to paragraph 1.5,
 23 top of page 2 {RYD00017870/2}:
 24 "SL to appoint other consultants (to include fire,
 25 DDA, acoustic, etc) after the main sub-contractors are

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1 on board."
 2 Do you remember there being a discussion at this
 3 meeting about the appointment of other consultants to
 4 include fire?
 5 A. I don't particularly remember that, no.
 6 Q. I mean, it says "SL to appoint"; can you account for how
 7 that gets into the minute as "SL" and not "SOC"?
 8 A. Because it wouldn't be my role to appoint anybody, so it
 9 definitely wouldn't -- isn't supposed to say "SOC".
 10 Q. When it goes in the next paragraph to say:
 11 "SL confirmed that his M&E sub-contractors are on
 12 board and investigations are underway."
 13 Given that he wasn't there and you were, why does it
 14 say SL?
 15 A. Because, like I said previously, he had probably sent
 16 meeting notes forward.
 17 Q. I see that, okay.
 18 So can you help at all with the first paragraph.
 19 Was there any discussion at this meeting to the best of
 20 your recollection about the appointment by Rydon of
 21 other consultants, to include fire?
 22 A. I don't particularly remember that conversation, but
 23 I know there was conversations about appointing people,
 24 not just fire people, I think it was various people.
 25 Q. DDA, can you help with that?

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1 A. Disabled disability , isn't it?
 2 Q. Disability Discrimination Act.
 3 A. Yes.
 4 Q. Do you remember specific discussions about whether you
 5 should appoint a consultant to assist Rydon with meeting
 6 obligations under that legislation ?
 7 A. I don't remember that at all , but I know the toilets in
 8 the boxing club -- no, maybe the nursery, were down to
 9 be DDA compliant.
 10 Q. Right.
 11 A. But I would expect a qualified architect to be able to
 12 do that.
 13 Q. I see. You give a specific example; can you think of
 14 any other examples where DDA expertise was considered?
 15 A. Possibly the boxing club.
 16 Q. Right.
 17 Can I ask you to look at a document which did
 18 involve Exova. This is issue 3 of the outline fire
 19 safety strategy report, which is at {CST00000085}.
 20 Now, this, Mr O'Connor, is issue 3 of Exova's
 21 outline fire safety strategy dated 7 November 2013.
 22 Have you ever seen this document before?
 23 A. Yes.
 24 Q. Were you aware of this report during your time as
 25 project manager on the Grenfell Tower project?

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1 A. I was aware of it because I remember the picture.
 2 Q. You remember the picture. Did you see it at the time,
 3 then?
 4 A. It was definitely on site .
 5 Q. It was definitely on site ; did you ever read it?
 6 A. Not that I recall .
 7 Q. Right.
 8 Do you remember the circumstances in which you saw
 9 it? You say you remember the picture. Can you, casting
 10 your mind back, tell us the sort of circumstances that
 11 you can recall whereby you might have had a chance to
 12 look at this document?
 13 A. This would have been -- as you went into the site office
 14 on the left there was a load of boxes where documents
 15 were kept.
 16 Q. Yes.
 17 A. That would have been in one of them.
 18 Q. It would have been in one of them, right .
 19 What would have given you the occasion to take the
 20 box down which had this document in it?
 21 A. Sorry, it wasn't boxes, it was a wooden structure, so
 22 you could see documents in it, it was almost like
 23 a multistorey, like, postbox, if you like .
 24 Q. I see. Do you remember any occasion when you pulled it
 25 out of its little structure and looked at it?

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1 A. I don't recall , no.
 2 Q. Do you remember any occasion on site when other people,
 3 that you could see or hear, did that?
 4 A. I don't recall seeing anybody reading it .
 5 Q. Right.
 6 Apart from an exchange of emails which we're going
 7 to come to in the September of 2014 between Exova and
 8 Studio E, among other people, which we're going to come
 9 to shortly, can you remember Exova ever giving any
 10 fire safety advice in relation to the rainscreen
 11 cladding façade at Grenfell Tower?
 12 A. No, it's not a conversation I would have had. I don't
 13 think I ever spoke to anybody from Exova.
 14 Q. Casting your mind back to your own experience on the
 15 Chalcots Estate -- I think you say you weren't
 16 involved -- do you remember whether Rydon engaged the
 17 services of a specialist fire safety engineer for that
 18 project?
 19 A. I wouldn't know.
 20 Q. You wouldn't know.
 21 A. Mine was all internal .
 22 Q. Right.
 23 I'll come back to those emails, but I'm going to ask
 24 you for the moment about Carl Stokes. Does the name
 25 mean anything to you?

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1 A. It does, yeah.
 2 Q. In paragraph 16 of your statement you say that you saw
 3 emails. Perhaps we ought to just look at it :
 4 {RYD00094221/8}, this is your statement, and at
 5 paragraph 16 you say, about eight lines down from there:
 6 "I was also aware that consideration was being given
 7 to fire safety and compliance with the Building
 8 Regulations throughout my involvement in the project
 9 because I saw emails involving Harleys, Studio E, RBKC
 10 Building Control ('Building Control') and CS Stokes &
 11 Associates Limited ('CS Stokes') (an independent fire
 12 risk assessor engaged by KCTMO who was allowed
 13 uninhibited access to the construction site)."
 14 Just moving on in your statement to page 10
 15 {RYD00094221/10}, please, if we can skip two pages
 16 forward to paragraph 19, you also say that :
 17 "I was aware that inspections were carried out by
 18 Rydon, Harleys, JS Wright Studio E, the Clerks of Works,
 19 CS Stokes, Curtins and Building Control during my
 20 involvement in the refurbishment project ."
 21 Then you say at page 11 {RYD00094221/11},
 22 paragraph 22, if we can just look at that, you say:
 23 "Regular inspections were carried out by CS Stokes,
 24 who I believe would be provided with information by
 25 KCTMO confirming any areas they thought should be

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1 inspected."

2 I have shown you all of those parts of your witness
3 statement. First of all, what did you think CS Stokes'
4 role was?

5 A. To look at fire safety as a whole on behalf of the
6 KCTMO.

7 Q. Fire safety as a whole in relation to the building or in
8 relation to the project or both?

9 A. In relation to -- to the project, really. He would
10 quite often just turn up on site and we would walk the
11 construction site first and then we would go up to
12 various floors, and he would quite often pick up,
13 you know, just little items that he wasn't -- I won't
14 say not happy with, but he would report back to the TMO.

15 Q. Did you go with him on these visits?

16 A. Not always. At first I did, because I believed it was
17 good to get a relationship, but after that it would have
18 been Jason or whoever was looking after the areas he was
19 going to.

20 Q. Did you ever read his reports?

21 A. Yeah.

22 Q. You did. Did you rely on his reports in any way?

23 A. When you say rely, I mean, if there was something in
24 there we needed to correct, then we would correct them.

25 Q. Yes, when I say rely, what I mean is, in making any

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1 decisions that you made yourself, did you use Mr Stokes'
2 reports as the basis for making those decisions?

3 A. I don't understand the question, sorry.

4 Q. Right. Did you do anything in reliance on anything he
5 said in his reports?

6 A. Only if it concerned us. If not -- the reports would
7 generally come from the TMO, so he would be looking at
8 various items that the TMO were due to be carrying out,
9 and that would then overlap with our work slightly by
10 saying, "Right, you need to do this, but that's not part
11 of whatever you're doing", so ...

12 Q. In his witness statement, Mr Stokes says that he was not
13 retained or appointed to undertake any supervisory role
14 of the refurbishment. Does that accord with your
15 recollection of his role?

16 A. I didn't really know what his full role was. I knew he
17 was employed by the TMO, and I knew he would come to
18 site to look at fire safety.

19 Q. Did you ever speak to Mr Stokes about the cladding to be
20 used on the building?

21 A. No. Not that I recall.

22 Q. Did Mr Stokes ever give you or anybody else at Rydon any
23 advice or any assurances in respect of the fire safety
24 of the rainscreen façade?

25 A. I don't think we discussed it.

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1 Q. Did you ever tell Mr Stokes that the rainscreen façade
2 was fire rated?

3 A. That doesn't sound like words I would use, so no.

4 Q. Did you ever tell Mr Stokes words to the effect that the
5 rainscreen façade was safe from a fire safety
6 perspective?

7 A. I don't believe so.

8 Q. Can we look at {ART00003597}, please. These are minutes
9 of a housing management liaison committee meeting on
10 16 February 2015. We looked at these yesterday,
11 I think, with Mr Lawrence in a slightly different
12 context.

13 The meeting was attended by, as you can see, you,
14 Christina Stephanou and Lynda Prentice from Rydon, and
15 Janice Jones and Siobhan Rumble from the TMO, as well as
16 Claire Williams.

17 A. Yeah.

18 Q. I would like to look at item 14 {ART0003597/3},
19 "Communal lobby - duct panels".

20 A. Yep.

21 Q. It says there:

22 "Some of the duct panels were broken, and found to
23 be various materials eg chipboard. Rydon's fire
24 strategy consultant had been on site and met Carl Stokes
25 (TMO's fire risk assessor) and agreed that these panels

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1 did not need to be fire resisting on the basis that the
2 services were fire-stopped at floor and ceiling slab
3 level and so there would be no fire spread within the
4 ducts."

5 Who did you understand to be Rydon's fire strategy
6 consultant?

7 A. I don't know. I don't know.

8 Q. We've seen that you were at this meeting. Did you see
9 these minutes after the meeting?

10 A. More than likely, yes.

11 Q. Would you have read them carefully?

12 A. I would have read them, yeah.

13 Q. Would you not therefore have seen that there was
14 a reference in them to Rydon's fire strategy consultant?

15 A. Yeah, I can't tell you who that would have been.

16 Q. Did Rydon have a fire strategy consultant?

17 A. Not that I'm aware of.

18 Q. Who could it have been, then, who met Carl Stokes and
19 made the agreement referred to?

20 A. I don't know. I honestly don't -- I don't know.

21 Q. Were you present at any meeting between any person who
22 could conceivably be described as occupying the position
23 of a fire strategy consultant and Mr Stokes?

24 A. I don't recall being in a meeting with anybody -- the
25 Rydon fire strategy consultant I don't recall at all.

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1 Q. Do you remember any discussion between either you or
2 anybody else at Rydon with Mr Stokes about the subject
3 of whether these panels did or did not need to be fire
4 resisting?
5 A. I recall a conversation about what they were made of.
6 They were -- I think they were adjacent to the lift
7 shaft. I recall having the conversation about what they
8 were made of, but there was no one else sort of
9 involved, and I think that's what probably sparked this
10 meeting, if it happened.
11 Q. So you recall a conversation with Mr Stokes about what
12 the panels were made of?
13 A. Yeah.
14 Q. Was that a conversation on site?
15 A. Yeah, it would have been, yeah.
16 Q. Were you qualified to make an agreement with him about
17 whether they did or didn't need to be fire resisting?
18 A. No.
19 Q. Who was it who attended on site and met Carl Stokes who
20 would have been qualified or was qualified to agree with
21 him that the panels didn't need to be fire resisting?
22 A. I think I've already answered that. I don't know.
23 Q. Who was responsible for drawing up these minutes?
24 A. Erm --
25 Q. You can look at page 1 {ART0003597/1} to see who was

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1 there, if we could, please, just to remind you. You can
2 see that it's you, Christina Stephanou, Lynda Prentice
3 and others from the TMO.
4 Do you know whether it was Rydon or the TMO who drew
5 up these minutes?
6 A. I think it would have been the housing officers .
7 Q. When you say the housing officers , you mean
8 Janice Jones --
9 A. Actually, on this one I've just spotted that
10 Claire Williams was there. Claire Williams would have
11 done that.
12 Q. We know that this is an Artelia document, but how many
13 of these meetings did you go to, these housing
14 management liaison meetings?
15 A. A fair few. They were more -- they weren't about --
16 this is quite a rare one, actually, but they were more
17 about residents and access, because there was a few
18 access problems at the time.
19 Q. Were minutes produced for all of these meetings?
20 A. I would imagine so. I couldn't clarify that they
21 definitely were, but I would imagine there was, yes.
22 Q. Right. Do you remember who was responsible in general
23 terms for drawing up the minutes and circulating them?
24 A. I would say Claire Williams.
25 Q. Is that a guess or is that a recollection?

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1 A. No, that's -- you know, if Claire was there, she would
2 definitely be the one that was producing these minutes.
3 MR MILLETT: Yes, thank you.
4 Mr Chairman, that's a convenient moment. I'm about
5 to turn to another topic.
6 SIR MARTIN MOORE-BICK: Good timing in that case,
7 Mr Millett .
8 Mr O'Connor, we will have a break now so we can all
9 get some lunch. Please don't talk to anyone while
10 you're out of the room about your evidence or anything
11 to do with it , and we will come back at 2 o'clock,
12 please.
13 THE WITNESS: Perfect, thank you.
14 SIR MARTIN MOORE-BICK: Thank you, if you would like to go
15 with the usher.
16 (Pause)
17 Good, 2 o'clock, please. Thank you.
18 (1.00 pm)
19 (The short adjournment)
20 (2.00 pm)
21 SIR MARTIN MOORE-BICK: Right, Mr O'Connor, ready to go on?
22 THE WITNESS: Yes.
23 SIR MARTIN MOORE-BICK: Good, thank you.
24 Yes, Mr Millett .
25 MR MILLETT: Thank you, Mr Chairman.

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1 Mr O'Connor, I was going to go on to a different
2 topic, but can I just revisit something from your
3 evidence this morning about Carl Stokes. Can I ask you
4 please to be shown {Day26/125:9} of your evidence this
5 morning.
6 At line 9 on that page -- do you see there I asked
7 you at line 7:
8 "Question: Fire safety as a whole in relation to
9 the building or in relation to the project or both?
10 "Answer: In relation to -- to the project, really .
11 He would quite often just turn up on site and we would
12 walk the construction site first and then we would go up
13 to various floors , and he would quite often pick up,
14 you know, just little items that he wasn't -- I won't
15 say not happy with, but he would report back to the TMO.
16 "Question: Did you go with him on these visits ?
17 "Answer: Not always. At first I did, because
18 I believed it was good to get a relationship , but after
19 that it would have been Jason or whoever was looking
20 after the areas he was going to ."
21 First of all , was that Jason North?
22 A. Yes.
23 Q. I would like to show you a document, which is
24 {CST00000002}, where you will see Carl Stokes' FRA, or
25 rather the part of it that is the, "Record of

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1 significant findings and action plan”, from
 2 October 2014. It’s a nine-page document, and it’s got
 3 manuscript in it or over it.
 4 Can I ask you to look at page 9 {CST00000002/9},
 5 please, and look at the bottom entry, where you can see
 6 “Identified risk or hazard”:
 7 “The external face of this building is to be over
 8 clad. The piece of cladding fixed to the external wall
 9 at the moment is on timber battens.”
 10 Then somebody has written on it, “OK, FR, no
 11 timber”. Do you see that?
 12 A. Yes.
 13 Q. Do you recall having any discussion yourself on site, or
 14 even off site, with Mr Stokes in or before October 2014
 15 about the overcladding?
 16 A. No, but I know what he’s referring to when he says
 17 timber battens.
 18 Q. What’s he referring to, please?
 19 A. This was a mock-up that was done on the side of the
 20 building prior to anything happening, so it was done on
 21 timber.
 22 Q. Do you know the date when you know that he saw that?
 23 A. I don’t, but it would have been the same day as
 24 Councillor Feilding-Mellen was there and the planning
 25 was there to look at the colours and the fixing types.

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1 Q. So that would have been some time in the summer of 2014?
 2 A. Yes, it would have.
 3 Q. I see.
 4 Can you explain “OK, FR”?
 5 A. I don’t know, that’s not my writing.
 6 Q. I know, I just wonder whether it triggers a recollection
 7 of the subject matter of a conversation between you and
 8 Mr Stokes?
 9 A. No.
 10 Q. Do you remember ever having any conversation with
 11 Mr Stokes about the overcladding being FR, fire
 12 resistant, fire retardant, fire rated?
 13 A. No.
 14 Q. Look at the right-hand column, “Actions to be taken”:
 15 “I would recommend that the contractor provides ...”
 16 Then you can see four questions:
 17 “1. The scope of works covering how this
 18 cladding(sic)? How will the cladding be fixed to the
 19 building?
 20 “2. What fixings will be used?
 21 “3. The fire rating of the cladding and the fixings?
 22 “4. The Building Control Officers acceptance of this
 23 fixing system and the cladding used?”
 24 Now, those questions are the same questions, even
 25 including the typo, that Ms Williams put to you in the

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1 email of April 2015 and then again in June 2015 we saw
 2 this morning. Do you want to see that again?
 3 A. No, I --
 4 Q. You remember that?
 5 A. I recall it, yeah.
 6 Q. You can’t recall dealing with it.
 7 Do you remember seeing this report or knowing where
 8 she got the questions from more generally?
 9 A. No, but reading this now I can see that she’s just copy
 10 and pasted it.
 11 Q. Yes.
 12 Can I ask you to look at another document, then,
 13 please, {CST00001284}. This is an email, and we need
 14 I think to look at the bottom of page 1. It’s an email
 15 you won’t have seen before, but it’s between Carl Stokes
 16 and the TMO of 24 April 2017, so it’s long after you
 17 left the project, and indeed after the project was
 18 completed. It’s from Carl Stokes to Janice Wray, and
 19 it’s in the context of the forwarding of a letter from
 20 the LFB, “External Fire Spread”, and it says:
 21 “Grenfell was clad but the cladding complied with
 22 the requirements of the Building Regulations, lots of
 23 questions asked of Rydons and answers received back from
 24 them.”
 25 Do you remember being asked lots of questions about

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1 the compliance of the cladding with the requirements of
 2 the Building Regulations?
 3 A. No.
 4 Q. Do you recall knowing whether anybody else was asked
 5 lots of questions and giving answers?
 6 A. I don’t know. I don’t recall that there was lots of
 7 questions asked.
 8 Q. Did you receive any questions from Mr Stokes?
 9 A. About this?
 10 Q. About anything.
 11 A. Not that stick out in my mind, no.
 12 Q. Right. That would include about the cladding? You
 13 don’t remember any questions from Mr Stokes about the
 14 cladding?
 15 A. No. Not that I recall.
 16 Q. Do you know from your knowledge and recollection whether
 17 Mr Stokes dealt with anybody else within Rydon about the
 18 overcladding?
 19 A. He would have no doubt spoken to Simon Lawrence, he
 20 would have no doubt spoken to probably Daniel Osgood.
 21 Q. You say “no doubt”; I mean, are you speculating or do
 22 you remember?
 23 A. That’s just purely speculation. I would say probably
 24 yes.
 25 Q. Right.

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1 To your knowledge, rather than speculation, did
 2 anybody from Rydons give any assurances to Carl Stokes
 3 about the fire safety of the cladding?
 4 A. Not that I recall.
 5 Q. No.
 6 Can I then turn to the topic of SD Plastering and
 7 how they came to be selected.
 8 You I think accept that the subcontractor for the
 9 interior window reveals package was SD Plastering or
 10 SDP.
 11 A. Yep.
 12 Q. They were selected in around May 2015; yes?
 13 A. Okay, yes, sorry.
 14 Q. Do you remember that the selection of SDP as the
 15 subcontractor for that work package occurred during your
 16 involvement as project manager?
 17 A. Yes, it probably did. They were doing other works on
 18 the building as well.
 19 Q. Yes, but it occurred during your tenure, your role as
 20 project manager?
 21 A. Yes.
 22 Q. Did you check to find out whether SDP were on the
 23 approved list, as we talked about earlier?
 24 A. No, for the same reason as we used SDP on most of our
 25 projects, and so I would presume someone had done that

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1 prior to me and prior to them being awarded the project.
 2 Q. Do you know whether they were on the approved list?
 3 A. I can't categorically say yes, but I would imagine so.
 4 Q. Right.
 5 Who was responsible for making the decision to
 6 retain SDP Plastering as subcontractor for this
 7 particular work package, was it you?
 8 A. No.
 9 Q. Who was it?
 10 A. It would have been one of the surveyors.
 11 Q. Name, please?
 12 A. Adam Marriott, Zak Maynard.
 13 Q. Okay, all right.
 14 Were you aware that SD Plastering had initially said
 15 they were not interested in doing the window trimming
 16 work?
 17 A. That does ring a bell, yes.
 18 Q. Yes.
 19 Can I look at a document with you, please,
 20 {RYD00042594}. This is an email from Adam Marriott of
 21 Rydon to SDP copied to you of 29 May 2015, "Morning
 22 Mark". Do you see that?
 23 A. I do.
 24 Q. There are two emails on that page, in fact. The bottom
 25 one is about the acceptance of the element of the works.

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1 The top one:
 2 "Morning Mark
 3 "Please accept this email as confirmation to
 4 proceed with the following additional works required at
 5 the above project;
 6 "- Window Surrounds Package to existing residential
 7 flats.
 8 "- Pipework Boxing Package (Adjacent to HIU/Hallway)
 9 to existing residential flats.
 10 "- Blinds/Curtain Removal & Reinstating Package to
 11 existing residential flats.
 12 "All for the sum of £152,677.80 (subject to 2.5%
 13 MCD). An official variation summary will follow ..."
 14 This was significantly lower than the sum included
 15 in Rydon's tender of £474,000-odd for windows, cills and
 16 boards, wasn't it?
 17 A. I wasn't aware of the sum.
 18 Q. Right. You weren't, all right.
 19 Did you never see the original tender amount broken
 20 down into work packages?
 21 A. Not particularly, no, I wasn't involved in finance.
 22 Q. Can I look at {HAR00010180}. You weren't, I think,
 23 copied in to this document. It's an email. Let's just
 24 look at it together. It's from Ray Bailey to
 25 Zak Maynard, copied to Simon Lawrence and people at

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1 Harley, and also Steve Blake at Rydon:
 2 "Grenfell - Internal trimming out."
 3 It says, "Hi Zak", and I would like you to look at
 4 the second-last paragraph. It says:
 5 "Whilst this project may be a little simpler,
 6 I don't think we can meet your cost plan of £80,000."
 7 This is about, as I say, internal trimming out.
 8 My question is: were you aware that Rydon had set
 9 a budget for the internal fit-out of £80,000?
 10 A. No.
 11 Q. Is it fair to say in general terms that Rydon were
 12 looking for a low price on the internal window trimmings
 13 because Harley would be too expensive to carry out that
 14 work?
 15 A. I wasn't involved in this, so I can't comment on whether
 16 they were looking for a cheaper price or not.
 17 Q. Right. Leave aside whether Harley would carry out that
 18 work, were you aware that Rydon were looking for the
 19 lowest price they could find -- or a low price, put it
 20 that way -- on the internal window trimmings at all?
 21 A. I was aware they were looking at different
 22 subcontractors, which tells me they were probably
 23 looking for a lower price, yes.
 24 Q. Right.
 25 Can we go back, then, to a topic we looked at this

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1 morning in brief, which was cavity barriers. Can I ask
 2 you to look first, please, at {TMO10041791/265}. This
 3 is the Rydon/TMO contract document, and this is
 4 a schedule of contract information for the project and
 5 it lists documents that Rydon were provided with.
 6 My first question is: did you ever look at this
 7 document during your time on the project?
 8 A. I don't remember seeing it, no.
 9 Q. Right.
 10 Would it not have been an important document for
 11 a project manager to see and understand and have in
 12 mind?
 13 A. Yes, probably.
 14 Q. Can you explain why you didn't?
 15 A. I wasn't -- I don't think it was issued to me.
 16 Q. Wasn't issued to you? Presumably the contract was
 17 issued to you in the sense that it was made available to
 18 you.
 19 A. Yeah.
 20 Q. And this would have been part of the contract; no?
 21 A. Yeah, I think like I said this morning, I didn't make,
 22 you know, an active effort to read the contract.
 23 Q. No, and that would mean you didn't make an active effort
 24 to read this schedule either?
 25 A. Yes.

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1 Q. Right.
 2 But as project manager, would that not have been
 3 your responsibility and in your mind that you intended
 4 to carry out?
 5 A. To read the contract?
 6 Q. To read the contract and look for the schedule of
 7 contract information?
 8 A. Not as such, no. This was my first project as project
 9 manager.
 10 Q. Right.
 11 On that score, let me ask you -- you say it was your
 12 first project as project manager, I appreciate that --
 13 did anybody at Rydon give you any induction or training
 14 as to what to do as project manager?
 15 A. No.
 16 Q. So when you were appointed or promoted to project
 17 manager, did nobody give you any guidance about what you
 18 should be doing, what documents you should be looking
 19 at?
 20 A. No.
 21 Q. So you were just left to your own devices?
 22 A. Well, I had Steve Blake and Simon Lawrence for support,
 23 but there was no training or, you know, that sort of
 24 thing to say, "Make sure you read this document" or
 25 "Make sure you read that document".

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1 Q. Right, and this was your first job as project manager
 2 ever?
 3 A. Yes.
 4 Q. Right, okay.
 5 Can I ask you to look at page 269 {TMO10041791/269},
 6 four pages on within the schedule, and look together,
 7 please, at item 170. This is LO1212-SPEC-001 structural
 8 performance dated 1 March 2013, 23 pages.
 9 I'm going to assume that you wouldn't have read this
 10 document, and I wonder whether you read that one. It's
 11 a specification produced by Curtins Consulting.
 12 Were you familiar with who Curtins Consulting were?
 13 A. Yes.
 14 Q. Were you aware that they had produced a 23-page
 15 specification?
 16 A. I believe I had seen the Curtins one, yes.
 17 Q. Right. Let's look at this. It's at {ART00000914},
 18 please, and I would like to go -- look at the first
 19 page, actually. It's dated 1 March 2013 and it's
 20 entitled "Structural Performance Specification for the
 21 Design, Supply and Application of Overcladding Systems
 22 to Grenfell Tower for Studio E".
 23 Just looking at its first page, do you think you saw
 24 this at the time?
 25 A. I don't recall seeing that.

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1 Q. Right, okay. You say you thought you were familiar with
 2 this document. Let's see if we can do a bit better.
 3 Go to page 9 {ART00000914/9}, please. I just want
 4 to ask you something specific about it.
 5 This is under the rubric "Design", top of the page,
 6 there is the heading under section 6, and it says this,
 7 let's look at it together:
 8 "In designing his over-cladding systems the
 9 Constructor must take full account of the geographical
 10 location of these buildings and the climate thereabouts.
 11 In particular he needs to consider the effects of ..."
 12 Then there is a long list of things, and in the
 13 third from bottom bullet or dash, says:
 14 "The need for effective fire barriers."
 15 Do you remember seeing this at the time, this
 16 document?
 17 A. No.
 18 Q. Do you remember at the time knowing that it was
 19 important for the contractor to ensure that there were
 20 effective fire barriers?
 21 A. Well, I knew there was discussion around the
 22 fire barriers because I'd seen emails between John Hoban
 23 of Building Control, Harley, and I think Carl Stokes was
 24 probably involved in it as well.
 25 Q. What process did you have in place to ensure your

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1 subcontractors, which would include Harley and Studio E,
 2 would consider the need for effective fire barriers as
 3 this document says?
 4 A. Sorry, can you reword that for me?
 5 Q. Yes.
 6 Was there any process in place at Harley(sic) to
 7 make sure that the subcontractors, Harley and Studio E
 8 thought about effective fire barriers?
 9 A. I don't know if there was a process in place but, like
 10 I said, I saw emails that told me that they were talking
 11 about effective fire barriers under certain regulations.
 12 Q. Now, in your statement, and I think we saw it earlier --
 13 and for our note it's paragraph 13 {RYD00094221/6} --
 14 you say you expected the designs prepared by Studio E,
 15 Max Fordham and other specialist subcontractors to have
 16 been prepared in line with the Building Regulations and
 17 other fire safety requirements.
 18 My question is this: do you accept that it was
 19 Rydon's ultimate responsibility, overall responsibility,
 20 for the designs that it passed to the TMO to make sure
 21 that the requirements for cavity barriers in the
 22 legislation were complied with?
 23 A. Now, yes. At the time, probably not.
 24 Q. Right. Thank you.
 25 Can we look at a document, {RYD00016000}. This is

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1 an email from Jordan Edelman from eBrit Services,
 2 21 August 2014 to Adam Marriott. Do you see that?
 3 A. Yes.
 4 Q. You're not copied in on this but I just want to show you
 5 the contents to you:
 6 "Afternoon Adam.
 7 "I have been speaking with Simon O'Connor in regards
 8 to the Fire protection & Fire stopping enquiries for the
 9 Grenfell Tower Regeneration project and Simon has
 10 advised me to contact yourself in regards to being
 11 included on the package enquiries. I understand from
 12 Simon that there may be an intumescent FP treatment
 13 requirement for the Structural Steel and may be some
 14 fire stopping works to follow and wish to note our
 15 interest for this package."
 16 First of all, eBrit Services, who were they?
 17 A. I don't know.
 18 Q. Okay.
 19 Do you recall the conversation that Mr Marriott is
 20 relaying to Mr Edelman in this email?
 21 A. This is from Jordan to Adam, yes?
 22 Q. This is from Jordan Edelman to Adam Marriott, yes.
 23 A. So he would have been -- speaking crudely, he would have
 24 been selling his wares. So he would have gotten my
 25 phone number and gave me a call to get on the list for

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1 tendering or winning some work.
 2 Q. Yes. It's my fault, I may have confused you by getting
 3 the names the wrong way round. This is Mr Edelman
 4 relaying to Adam Marriott a conversation that he,
 5 Mr Edelman, has had with you.
 6 Let me repeat my question, because I have
 7 unfortunately confused you with it.
 8 Do you remember having a conversation with
 9 Jordan Edelman about fire protection and firestopping
 10 enquiries?
 11 A. No.
 12 Q. Right.
 13 Do you remember whether you discussed intumescent FP
 14 treatment with him?
 15 A. I don't know what that is, so no.
 16 Q. Right. Because he says, "I understand from Simon that
 17 there may be an intumescent FP treatment requirement for
 18 the Structural Steel", but you say you don't recall the
 19 conversation and you don't know what an intumescent FP
 20 treatment is?
 21 A. No.
 22 Q. Can you explain how Mr Edelman came to write this in
 23 an email to Mr Marriott, unless you had said what he
 24 says there?
 25 A. I can't explain that. I mean, he doesn't use my second

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1 name in that either.
 2 Q. He does at the top of the email. He says, "I have been
 3 speaking with Simon O'Connor", which is you.
 4 A. No, I don't know how he would come about that.
 5 Q. Right.
 6 A. Unless I got that from somewhere, but it's not something
 7 that rings a bell with me. I don't think I know what an
 8 FP treatment is now.
 9 Q. Did Mr Marriott, who receives this email, ever come to
 10 you and say that he understood that you and Mr Edelman
 11 had had a conversation either about firestopping or
 12 about intumescent FP treatments?
 13 A. Not that I recall.
 14 Q. Do you remember having any conversation with Mr Edelman
 15 of eBrit?
 16 A. No.
 17 Q. Can I ask you to look at {RYD00018724}, please. This is
 18 an email, and I would like just to look at the bottom
 19 email on page 1, dated 4 September 2014 from you,
 20 Mr O'Connor, to Neil Crawford, "Subject:
 21 Building Control". You say there:
 22 "Morning Neil
 23 "Following a FRA yesterday on Grenfell Tower the
 24 assessor asked if the LFB had been issued a copy of the
 25 building control application form for comment.

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1 "Can you please advise if they were issued a copy."
 2 Do you see that?
 3 A. I do.
 4 Q. Let's look at the top email together, where
 5 Neil Crawford comes back to you a little bit later the
 6 same day, 24 September 2014, and copied to
 7 Simon Lawrence, and he says:
 8 "Hi Simon
 9 "I am not aware if the LFB have been given a copy of
 10 the building control application for comment. I know
 11 that Paul Hanson is the RBKC Building Control fire
 12 officer and he prefers to escalate any fire issues that
 13 he is unsure about to the LFB via his contacts. I am
 14 sending out a pack on information today to John Hoban as
 15 agreed with Simon (Lawrence) after yesterday's meeting.
 16 "I spoke to John Hoban yesterday afternoon whilst on
 17 the Academy site and mentioned Grenfell in passing - he
 18 mentioned that he is away for 3 weeks' holiday as of the
 19 09th October ..."
 20 Did you ever follow up this conversation with
 21 Mr Lawrence or Mr Crawford?
 22 A. I don't believe so. I don't ... I can't recall, but
 23 I don't believe so.
 24 Q. Right. Did you ever follow up with the LFB?
 25 A. I don't recall. I know I was -- we had the Fire Brigade

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1 down on site quite often, but I don't recall if it was
 2 regarding this.
 3 Q. Right.
 4 Can you look, please, at {RYD00018963}. Let's look
 5 together at the email at the top of page 1 on that page,
 6 which is an email from John Hoban of 29 September 2014
 7 to you, Mr O'Connor, copied to Simon Lawrence. Do you
 8 see that?
 9 A. I do.
 10 Q. He says:
 11 "Dear Simon,
 12 "The Building Regulations 2010 [as amended]
 13 "Grenfell Tower ...
 14 "Concerning our brief discussion this morning
 15 relating to the Grenfell Tower Project.
 16 "Please find detailed below the last e-mails that
 17 I have in my possession relating to building regulation
 18 matters for your information."
 19 So it looks as if you did have a brief conversation
 20 on 29 September 2014 with Mr Hoban at RBKC
 21 Building Control, it looks from this?
 22 A. I don't recall that conversation.
 23 Q. Right.
 24 Do you recall any conversation around this time with
 25 Mr Hoban on the subject that he is talking about?

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1 A. Not specifically. I mean, it was six years ago, so no,
 2 not specifically.
 3 Q. If we look at the subject, "FW: Grenfell Tower,
 4 Grenfell Road, Refurbishment - Fire Strategy P2", does
 5 that trigger a recollection about what you might have
 6 discussed with Mr Hoban at that time?
 7 A. So that Grenfell Road ... the only thing I can think,
 8 and I don't know if it's relevant or not, is we was
 9 using the Fire Brigade service road to the right-hand
 10 side of the tower for storage, et cetera. I may have
 11 asked him his thoughts on that, but I had already spoke
 12 to the Fire Brigade regarding that, so I don't know.
 13 Q. Right.
 14 Can you please turn to {EX000001430}. This is
 15 an email chain between employees of Rydon, Exova,
 16 Studio E and Harley, and it's a fairly long email
 17 discussion on 18 September 2014.
 18 Can I just ask you to look with me, please, at the
 19 bottom of page 1, and it goes over the page to page 2
 20 {EX000001430/2}, and it's an email from
 21 Daniel Anketell-Jones on 18 September to Neil Crawford,
 22 copied to Simon Lawrence and to you, Mr O'Connor, and
 23 also to Kevin Lamb, who was working with Harley at the
 24 time. The subject is "Cavity Fire barriers". Do you
 25 see that?

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1 A. I do.
 2 Q. It says:
 3 "Neil,
 4 "Thank you for your response.
 5 "The insulation is class 0. Therefore after reading
 6 the correspondence below; I believe that the fire
 7 barrier in these locations, will not be necessary."
 8 Then he goes on to say:
 9 "Can you confirm that this is acceptable?
 10 "Kind Regards
 11 "Daniel Anketell-Jones."
 12 When you got this email, do you remember looking at
 13 it and reading it?
 14 A. I think these are the emails that I was referring to
 15 earlier.
 16 Q. Yes. So the answer to my question is: yes, you did?
 17 A. Yes.
 18 Q. You saw his reference to class 0, and you can see it
 19 there if we just flip back to the bottom of page 1 of
 20 the email string.
 21 What was your understanding about what he meant,
 22 "The insulation is class 0"?
 23 A. I wouldn't be able to tell you at that time. These were
 24 emails that I was cc'd in to, so I was just aware that
 25 there was talk about cavity barriers. I wouldn't have

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1 been scrutinising the emails.
 2 Q. Why were you copied in to these emails, do you think?
 3 A. Because I was project manager on site.
 4 Q. Right.
 5 At the time, did you think that, because you were
 6 project manager on site and you had been copied on in
 7 these, it was important for you to understand what was
 8 being said?
 9 A. In reflection, probably yes. But at the time, I was
 10 just cc'd in, so it was just for information.
 11 Q. Right. So you were, again, a spectator on these emails
 12 rather than a participant in the detailed information?
 13 A. Yes.
 14 Q. In general terms, did you have any -- let me try this it
 15 this way: had you heard of the expression "class 0"?
 16 A. Yes, in painting terms.
 17 Q. Can you just explain a bit further what that means?
 18 A. I just knew it was a class 0 paint that was put in
 19 I think it was fire escapes.
 20 Q. Right. What did class 0 mean, or what did it signify to
 21 you?
 22 A. From memory I think it was something to do with the
 23 spread of flame.
 24 Q. Something to do with the spread of flame?
 25 A. Back -- I'm talking historically, back then.

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1 Q. Absolutely, I understand that, and I'm certainly not
 2 going to stand here and examine you about your
 3 understanding of class 0 now, but at that time, your
 4 understanding was it was something to do with the spread
 5 of flame.
 6 Can you tell us where that understanding came from?
 7 A. I don't know, it was just painting, really, more than
 8 anything.
 9 Q. Right.
 10 Did the statement, "The insulation is class 0"
 11 concern you at the time?
 12 A. No.
 13 Q. You didn't have cause to query it?
 14 A. No, like I say, I was a participant in these
 15 conversations. There were people that actually do this
 16 for a living, they're qualified to do this, so I was
 17 just a participant. I was just, you know, seeing the
 18 email trail go through.
 19 Q. Yes.
 20 A. In fact, to be honest, it gave me a little bit of
 21 comfort that they were talking about firebreaks and
 22 cavity barriers and stuff like that.
 23 Q. Right.
 24 Did you understand the relevance of that statement,
 25 "The insulation is class 0"?

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1 A. Probably not completely, no.
 2 Q. But you say it gave you comfort. What sort of comfort
 3 did it give you?
 4 A. Well, I knew they were talking about fire, and they're
 5 specialists, so it's -- to me that's positive.
 6 Q. Okay. So are you saying that when he said, "The
 7 insulation is class 0", that was a positive?
 8 A. No, I'm just saying the whole conversation to me was
 9 positive. There was an actual conversation asking
 10 people's opinions, specialists' opinions, about what
 11 they thought about their knowledge.
 12 Q. Right.
 13 Did Mr Anketell-Jones' reference to the insulation
 14 as class 0 give you any understanding, comfort, feeling
 15 about the appropriateness of the insulation?
 16 A. I don't -- I don't think I probably read this in full,
 17 I was just aware there was a conversation going on.
 18 Q. Fair enough.
 19 Now, can I ask you to turn to {SEA00011730}. This
 20 is an email chain between Neil Crawford and
 21 Terry Ashton, the same day, 18 September 2014, in which
 22 you are also copied.
 23 If we look at the bottom of page 1, Terry Ashton at
 24 Exova -- I say you're copied in; you're copied in on the
 25 next one up, to be fair to you. Let me just show you

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1 the scheme. The email at the bottom of page 1 is
 2 an email from Mr Ashton to Mr Crawford, and then
 3 Mr Crawford thanks Terry Ashton the same day and then
 4 addresses a question to Daniel Anketell-Jones at Harley,
 5 but he copies in Simon Lawrence and you. Can you see
 6 that?
 7 A. Yes.
 8 Q. So although you don't get the email from Mr Ashton to
 9 Mr Crawford, you do get Mr Crawford's response. Let's
 10 just take it in stages.
 11 He says in the second email, this is Ashton:
 12 "Neil
 13 "A material which has a Class 0 rating is not
 14 necessarily non-combustible although the reverse is
 15 invariably true. Some Class 0 products will burn when
 16 exposed to a fully developed fire. In any case, you
 17 need to prevent fire spread from on flat to the flat
 18 above as I stated in my earlier email. What isn't clear
 19 from the information to hand is whether or not there is
 20 a continuous cavity from top to bottom in any part of
 21 the cladding (apart from around the column casings)
 22 irrespective of the type of insulation?"
 23 Then the response comes back, and you can see what
 24 he says:
 25 "Daniel,

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1 "Can you confirm your position in relation to
2 Terry's comment below regarding combustibility and
3 continuous cavity paths."

4 Then there is something about KAA and Mr Hoban
5 there, which I don't think I need to put to you at this
6 point at least.

7 Can I ask you, when you got this email from
8 Mr Crawford by way of copy, did you look at the email
9 from Mr Ashton to Mr Crawford to which this was
10 a response?

11 A. I can't be sure.

12 Q. Would it have been your habit to do so at the time? If
13 you got an email like this, would you have looked down
14 the chain to see what the conversation was about?

15 A. There was such a large quantity of email traffic that
16 I can't honestly say yes, I would go through every
17 single trail, and -- you know, so I would say no,
18 probably not.

19 Q. Do you have any recollection of being told that
20 a material which has a class 0 rating is not necessarily
21 non-combustible?

22 A. No.

23 Q. Did it alert you to the fact that whether or not the
24 insulation product was class 0, that was something to
25 consider so far as safe use on Grenfell Tower was

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1 concerned?

2 A. Well, I think, like I said this morning, my assumption
3 was the specialist that designed this had taken all this
4 into account. I'm not qualified to do that.

5 Q. After you received that email, do you know whether you
6 or anybody else at Rydon undertook any investigations to
7 satisfy yourself or Rydon that the insulation was
8 compliant with the Building Regulations?

9 A. Not me personally, but I know there was more email
10 traffic on this subject, wasn't there?

11 Q. Yes, and I'm just asking for your recollection. Leave
12 aside the emails which we can read. Do you recall any
13 internal discussion about investigations into whether or
14 not this product --

15 A. No.

16 Q. -- should be used?

17 A. No.

18 Q. Can I ask you then, please, to be shown {EXO00001433}.
19 This is an email the following year, in the March of
20 2015, in the context of a long email chain between RBKC
21 Building Control, Siderise, Harley, Studio E and Rydon,
22 and Terry Ashton at Exova. You don't see all of these,
23 but you see, I think, some of these.

24 This particular one at page 1 is copied to you, the
25 lower part of the page. In fact, both emails are.

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1 There is an email from John Hoban of 30 March 2015 to
2 various recipients, including you. Can you see that?

3 A. I do.

4 Q. "Subject: Grenfell Tower Fire Stopping", and this is
5 from John Hoban at RBKC, as you can see, and it says:

6 "The Building Regulations 2010 ...
7 "Grenfell Tower ...

8 "Please find detailed below a copy of an email sent
9 to various persons on the 20th of March 2015, concerning
10 the topic relating fire stopping of the compartment
11 floors to the building. I would advise you that it is
12 my interpretation of diagram 33 of Approved Document B
13 is that the detail between compartment floors and
14 external cladding is not a cavity barrier, therefore it
15 must be fire stopped to at least the standard of the
16 existing compartment floor [120 minutes]. Therefore the
17 methods described in clause 9.13 would not be
18 appropriate in this particular case."

19 Then you can see at the top Ricky Kay, who is the
20 national façades manager at Siderise, responds to
21 John Hoban and Harley and Neil Crawford at Studio E, and
22 also to you as a copy, as well as Mr Ashton, and he
23 says:

24 "Please can somebody forward over a drawing of the
25 build-up of the cladding so that my Technical Officer

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1 can evaluate and forward an official response with
2 a SIDERISE product specification."

3 Do you remember whether you took any steps to ensure
4 that such a drawing was sent?

5 A. I wouldn't have taken steps to --

6 Q. Do you know whether any steps were taken to ensure that
7 such a drawing was sent, whether it was you or anybody
8 else?

9 A. I would expect Harley to have responded to that.

10 Q. Do you know whether they did?

11 A. I don't know if they did.

12 Q. Can I ask you to look at {RYD00037449}. Let's look at
13 the top email. I don't think you got the one below it.
14 This is from Simon Lawrence to Chris Mort at Siderise,
15 and it provokes a response from Ben Bailey, and you're
16 copied in on that response at the top of the page,
17 30 March 2015, and the request from Ben Bailey is:

18 "Simon is there a building fire strategy document
19 and some information on internal finishes that you can
20 send over for me to pass on to Siderise?"

21 Was there a building fire strategy document that you
22 were aware of which could have been passed on?

23 A. I don't recall. I wouldn't have responded to it anyway,
24 I was just cc'd in to it. So, you know, I wouldn't have
25 actioned that.

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1 Q. We can see that there is also a reply to this from
 2 Simon Lawrence, 31 March, the next day, {RYD00037478}.
 3 He answers the question. He says:
 4 "Morning Ben,
 5 "Yes there is but it only relates to the bottom four
 6 levels where we are constructing new. As we are
 7 constructing new the fire ratings are in line with the
 8 current regs (Approved Document B). Anything above that
 9 is existing and there is no records showing what fire
 10 rating the slabs and walls (internal and external) were
 11 constructed to when the building was originally built
 12 back in 1974. We know that it is unlikely that the
 13 party walls, etc would be in line with current regs
 14 however this can't be proved without extensive surveys
 15 and specialist analysis. Unfortunately that is what you
 16 get with refurb and because we can't prove otherwise the
 17 Building Control Officers will revert to current regs.
 18 On a better to be safe than sorry approach."
 19 Now, you saw this document as a copy.
 20 Mr Lawrence gave some evidence to the Inquiry this
 21 week, on 20 July 2020, on the basis of his
 22 understanding, where he says in this email the building
 23 fire strategy document "only relates to the bottom four
 24 levels which we are constructing new".
 25 He told the Inquiry that, on reflecting on the

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1 documents, he now thinks he misunderstood at the time
 2 what he was being asked for, and he thinks that he was
 3 referring to the fire strategy drawings from Studio E.
 4 That's why he thinks, as he told us, he answered
 5 incorrectly. Just for our own internal reference,
 6 that's {Day23/103:16-21}.
 7 I'm interested in your understanding, Mr O'Connor.
 8 What was your understanding of Mr Lawrence's email
 9 back to Ben Bailey when he said that the fire strategy
 10 only related to the bottom four levels?
 11 A. I couldn't be sure, unless he was referring to the fire
 12 risk assessment we did on the bottom four floors.
 13 Q. Did you have a view at the time at all about whether
 14 Mr Lawrence was right or wrong when he said that the
 15 building fire strategy document related only to the
 16 bottom four levels?
 17 A. I think I've made it quite clear earlier on in the day,
 18 I don't have that extensive knowledge of whether it just
 19 included the bottom four floors or the entire building.
 20 Q. Right, very well. So you can't comment and help us as
 21 to whether you had a different view from Mr Lawrence
 22 about what this document covered?
 23 A. No, I can't, I --
 24 Q. All right.
 25 Now, it appears that Siderise say that they asked

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1 Harley for this document but never got it, and that the
 2 fire strategy was never actually provided to Siderise.
 3 Do you have a recollection of whether you or
 4 Simon Lawrence sent the fire strategy to Harley in order
 5 to give to Siderise, as Siderise had asked?
 6 A. I don't recall. I don't think so. I don't think
 7 I would have done.
 8 Q. Right.
 9 A. I can't comment for Simon.
 10 Q. We know or we are told that Siderise didn't get it. Can
 11 you think of any reason that you would be aware of why
 12 Siderise never got the fire strategy document they were
 13 after?
 14 A. No.
 15 Q. Can I ask you then to look at {RYD00039964}, turning
 16 away from the discussion about the strategy document and
 17 on to a slightly different aspect of the same topic.
 18 This is an email from Simon Lawrence to
 19 Daniel Osgood, copied to you, Mr O'Connor, of
 20 27 April 2015. The subject is "Grenfell - Harley
 21 cladding". He says:
 22 "Morning Danny.
 23 "I understand you have landed at Grenfell ok this
 24 morning and are getting your head around Harley's façade
 25 package and the cladding. I have filed all of the

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1 information that we have (drawings & material info) in
 2 the following location ..."
 3 Then there is a long filing location.
 4 Just out of interest and in light of your evidence
 5 this morning about management systems, can you describe
 6 what this is, this drive, M:\Maintenance projects\Jobs\
 7 Current Jobs?
 8 A. That is the RMS.
 9 Q. Oh, that's the RMS. Right, I see, okay.
 10 "I'm sure it'll take a few days or so to get to
 11 grips with it so happy reading. Please pay particular
 12 attention to the Firebreak spec and insulation guide to
 13 ensure that they install correctly before any Building
 14 control inspection."
 15 I'm just interested in that last sentence, "Please
 16 pay particular attention to the Firebreak spec and
 17 insulation guide".
 18 Do you know what the firebreak spec and insulation
 19 guide was that Mr Lawrence was referring to?
 20 A. I would imagine it would be Harley's spec, because it's
 21 got Harley Façades at the end of the strapline for the
 22 RMS.
 23 Q. You imagine it. Can we see if we can nail this down,
 24 then. There are two documents we should perhaps look
 25 at. The first is {SIL00000228}, please. This is

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1 a Siderise document, "Siderise RH and RV cavity barriers
2 for use in the external envelope or fabric of
3 buildings".
4 Was this the firebreak spec that you saw or that was
5 sent?
6 A. I can't recall.
7 Q. Let's look at {CEL00000013}.
8 Was this the insulation guide that was referred to
9 in the email?
10 A. I can't recall, sorry, I can't --
11 Q. Have you ever seen this document before?
12 A. I don't recall seeing it back then, no.
13 Q. Right. You have seen it since, have you?
14 A. No, I've seen the other one since.
15 Q. I see. Have you seen this one since?
16 A. I don't recall seeing this, no.
17 Q. Okay.
18 Going back to the email, if we can, please,
19 {RYD00039964}. You were copied in on this email. Did
20 you yourself take any steps to understand what the
21 documents were to which Mr Lawrence was referring when
22 he said firebreak spec and insulation guide?
23 A. I may well have done, but I don't -- I can't say
24 I definitely did.
25 Q. Right.

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1 What steps did you take to ensure that Mr Lawrence's
2 instructions were carried out?
3 A. I probably had a meeting with Danny, or Daniel Osgood,
4 sorry.
5 Q. What steps did you take to ensure that, in general
6 terms, cavity barriers were correctly positioned and
7 installed within the rainscreen façade?
8 A. That goes back to our inspection procedures that I spoke
9 about this morning, whereas he would go up with
10 a drawing and inspect the cavity barriers installed
11 prior to Building Control being invited to see them.
12 Q. Right.
13 Let's just turn, then, to the topic of installation
14 which you're referring to and follow that up.
15 Can I ask you to look at something you have not seen
16 before this Inquiry, perhaps, which is the report of
17 Dr Lane, who is one of the Inquiry's experts. This is
18 {BLAR00000003/38}. This is, I should just tell you,
19 Dr Lane's report to the Inquiry of 12 April 2018,
20 section 8.
21 I would just like to look at a diagram with you. It
22 is figure 8.39 on page 38, and it's in paragraph 8.9.34.
23 This is a diagram showing the cavity barriers specified
24 for the façade compared with the as-built drawing.
25 Did you ever attempt to compare the location of the

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1 horizontal cavity barriers, which you can see there on
2 the right-hand side in the diagram, with the location --
3 sorry, the horizontal cavity barriers which you can see
4 there contained in the as-built drawings with the
5 location of the cavity barriers as actually installed?
6 A. Not personally, probably not.
7 Q. Did you ever record the results of your installation
8 inspections anywhere, specifically in relation to cavity
9 barriers?
10 A. I wouldn't have done the inspections. It would have
11 been the external manager, Daniel.
12 Q. Right.
13 Did Mr Osgood record the results of his inspections
14 in relation to the cavity barriers to make sure that the
15 installation complied with or followed the design
16 drawings?
17 A. I would imagine so, yes, and so would the clerk of
18 works, and Building Control for that matter.
19 Q. If the cavity barriers were placed in different
20 locations from those shown on the design drawings, do
21 you agree that that would constitute defective
22 workmanship?
23 A. Yes.
24 Q. And it would be defective workmanship which Rydon,
25 through its on-site team, would be responsible for

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1 identifying and ensuring was rectified?
2 A. Yes, as well as the Building Control and everybody else.
3 Q. Well, I'm not asking you about them, I'm asking you
4 about Rydon.
5 A. Yes.
6 Q. What about if a cavity barrier was installed the wrong
7 way round, in other words upside-down?
8 A. I would expect them to notice that.
9 Q. And what about if a horizontal cavity barrier was
10 installed in a vertical position?
11 A. Again, I would expect them to notice that.
12 Q. Would you accept again that Rydon was ultimately
13 responsible for identifying and rectifying any of those
14 kinds of problems?
15 A. Yes.
16 Q. Were you ever alerted to any concerns regarding the
17 location of the cavity barriers by anybody?
18 A. The location of them?
19 Q. Yes.
20 A. Not that I'm aware of, no.
21 Q. Were you ever aware of any concerns regarding the
22 workmanship in relation to the installation of cavity
23 barriers?
24 A. I think there was an email from me to Harley where
25 I think they were making comments of something being in

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1 the wrong way round. That was with regard to water
 2 ingress and not cavity barriers, though.
 3 Q. Can we look at page 32 {BLA00000003/32} and look at
 4 figure 8.34, please. So that's back six pages or so in
 5 the same document. This is a photograph showing
 6 insulation affixed to column and rainscreen cladding
 7 brackets. Dr Lane has inserted some comments in boxes
 8 there.
 9 A. Yeah.
 10 Q. You can see those. This shows cavities which were
 11 unfilled where they meet the cavity barriers, doesn't
 12 it?
 13 A. It does.
 14 Q. If you now move to page 40 {BLAR00000003/40} and look at
 15 figure 8.42, please, we can see that here a junction of
 16 a column and a spandrel horizontal cavity barrier, and
 17 that shows, just looking at the picture, that the cavity
 18 barrier was poorly fitted to the exterior of, in this
 19 case, flat 12. Do you accept that? Do you agree with
 20 that?
 21 A. I can see that, yes.
 22 Q. Did you ever consider that cavities were created where
 23 the pre-cast concrete intersected with the cavity
 24 barrier because of ridges in the pre-cast concrete? We
 25 can see the ridges there in the column.

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1 A. I wasn't actually on the project when any of the columns
 2 were completed.
 3 Q. No, but did you ever consider, during your time on the
 4 project, that there would be cavities where the edges of
 5 the cavity barriers would have met the columns, because
 6 there were ridges, vertical ridges, or trenches or
 7 grooves, if you like, in the columns?
 8 A. No, because, like I said, this section of work, it was
 9 not even started when I left.
 10 Q. Didn't you realise that the cavities would not be filled
 11 by the cavity barriers, at least in those locations?
 12 A. No, and like I say, I would expect specialists to pick
 13 that up, not me. And I think if we was looking at it,
 14 maybe I would have seen it, but I wasn't there.
 15 Q. Looking at figure 8.42, did you ever observe any
 16 workmanship like that during the time when you
 17 inspected?
 18 A. I can't see it, sorry.
 19 Q. You can't see ...?
 20 A. 8.42.
 21 Q. It should still be on the screen, it's figure 8.42.
 22 A. Sorry, yes, I was looking at the numbers on the side.
 23 Q. I'm so sorry, figure 8.42, "Junction of column and
 24 spandrel horizontal cavity barrier". It says "Poorly
 25 fitting at edges".

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1 My question is: did you ever observe any workmanship
 2 like that?
 3 A. Not that I recall, no.
 4 Q. If you had done, would you have appreciated that this
 5 presented a problem and asked for it to be rectified?
 6 A. I would like to say yes.
 7 Q. Another example, can you go to page 43 {BLAR00000003/43}
 8 and look, please, with me at figure 8.46. Here we have
 9 a photograph of a horizontal column cavity barrier
 10 showing roughly cut rear faces and roughly cut edges.
 11 Do you see that?
 12 A. I do.
 13 Q. Do you agree that that shows poor work, poor cutting,
 14 leaving those sorts of edges in that condition?
 15 A. It certainly exposes the grooves or ridges to which you
 16 referred to earlier.
 17 Q. If you look at the photograph down, Dr Lane says:
 18 "This quality of preparation led to a poor fit when
 19 installed, as shown in Figure 8.47."
 20 And if we look at 8.47 closely, Mr O'Connor, you can
 21 see how the horizontal cavity barrier fitted very
 22 poorly. Can you see that? She explains how in detail.
 23 A. I can.
 24 Q. Do you agree that these are significant workmanship
 25 issues?

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1 A. Yes, I suppose, yeah.
 2 Q. And that they happened on your watch?
 3 A. It didn't happen on my watch, because I wasn't there.
 4 Q. So this happened after your time, is that right?
 5 A. There was nothing on the columns, because the mast
 6 climbers were too close.
 7 Q. Okay.
 8 In his witness statement, Ben Bailey of Harley said
 9 that he was shocked by the photographs in this report.
 10 Are you shocked?
 11 A. Yes.
 12 Q. Do you know, and I know you say you weren't there at the
 13 time, but can you explain how shockingly poor
 14 workmanship was allowed to happen unchecked? Can you
 15 give us an insight into that?
 16 A. I can't, because I wasn't there, so I can't comment on
 17 what was going on when I wasn't present.
 18 Q. Is this kind of workmanship something that you would
 19 have expected Rydon's quality assurance and inspection
 20 regime to have picked up?
 21 A. Yes.
 22 Q. Are you aware of any defects in that process during your
 23 time which would explain why this kind of quality of
 24 workmanship wasn't picked up?
 25 A. Not that I'm aware of, no.

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1 Q. Can I ask you to go to {RYD00082733}, please. This is
 2 a site inspection report created by John Rowan and
 3 Partners. They're the clerk of works, aren't they?
 4 A. Yes.
 5 Q. It's dated 16 June 2015, while you were still engaged on
 6 the project as project manager.
 7 A. Yes.
 8 Q. Let's look at the bottom of page 1 under "Executive
 9 summary", can you see it says:
 10 "Rydon indicated at the site meeting today they are
 11 12 weeks behind on the contract programme. At the site
 12 meeting a recovery programme was issued and this will,
 13 accordingly to Rydon's, pull back the lost time to enable
 14 the contract to finish on time 23rd October 2015."
 15 Do you remember that as a fact, at that stage you
 16 were very behind on the project?
 17 A. Well, I think I said earlier, and it was before this, we
 18 was nine weeks behind, so it kind of makes sense, if I'm
 19 honest.
 20 Q. Yes, I see.
 21 A. We wasn't pulling time back; it was moving out.
 22 Q. Just continuing in that box, a few lines down it says:
 23 "Rydon's are progressing with the tendered detail of
 24 the top roof new cladding details and panels are being
 25 procured."

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1 Again, the panels, is that a reference to the ACM
 2 panels at that stage?
 3 A. That sounds to me like it's talking about the crown.
 4 Q. Right.
 5 A. I think -- it doesn't say crown, but reading it, "top
 6 roof", the only thing that was on the roof was the
 7 crown.
 8 Q. Yes, I follow.
 9 Can we turn to the next page of this, page 2
 10 {RYD00082733/2}, please, and four-fifths of the way down
 11 the page you will see a heading, "Review site inspection
 12 log: Building Control."
 13 "Note:
 14 "Last building control site visit was the same as
 15 before Friday 15th May 2015. The only observation was
 16 that further details of the cladding fire breaks were
 17 required. Rydon to confirm if they have done this."
 18 I just want to ask you about those few last words
 19 there, "Rydon to confirm if they have done this".
 20 Do you agree that this was Rydon's responsibility,
 21 that further details of the cladding firebreaks were
 22 required?
 23 A. It would have been Rydon's responsibility to get it and
 24 pass it on, yes.
 25 Q. And within Rydon it would have been your responsibility;

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1 yes?
 2 A. Mine or Simon's, yes.
 3 Q. As project manager, you would have had that within your
 4 remit?
 5 A. Possibly.
 6 Q. You say "possibly". You don't sound very sure.
 7 A. I don't think it -- yeah, it would have been me or
 8 Simon.
 9 Q. Are you sure about what was in your remit, Mr O'Connor?
 10 A. Yes.
 11 Q. So why are you not sure, when answering my question, as
 12 to whether or not it fell within your remit to obtain
 13 further details of the cladding firebreaks?
 14 A. I don't know. Okay, you know, for me it's asking for
 15 further details. I possibly would have asked someone
 16 else for further details, to pass them on.
 17 Q. Right.
 18 Forgive me for making this observation, but I do
 19 feel I need to ask you about it: you don't sound as if
 20 you were terribly sure about where your job ended and
 21 Simon Lawrence's began. Is that a fair comment?
 22 A. I don't think it's fair. It's six years ago and you're
 23 asking me to recollect a sentence in a document. There
 24 was thousands of documents. I'm trying my best to be
 25 honest and say it would have been myself or

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1 Simon Lawrence. I can't categorically say I did it and
 2 I can't categorically say I didn't do it.
 3 Q. I understand. I was just asking a question about how
 4 much certainty you had about the ambit -- you know, the
 5 edges of your remit and what you were and weren't
 6 responsible for.
 7 A. Yeah. I think our -- you know, Simon would quite often
 8 take over on things like this.
 9 Q. Do you remember whether you took any steps to action
 10 this, in other words to give the confirmation that the
 11 clerk of works had noted here?
 12 A. I think I've already said, I don't.
 13 Q. Can I ask you then to turn to {RYD00089251}. This is
 14 an email dated 19 June 2015, so a few days later. Help
 15 me with this, because I think we can see what happens
 16 here.
 17 You, in the second email there, say to Mr Osgood,
 18 "Subject: Site Inspection", and it looks as if you
 19 attach a report:
 20 "Morning Danny,
 21 "Can you please respond to the comment about fire
 22 breaks."
 23 You don't copy Mr Lawrence in. Then he responds to
 24 you the same day:
 25 "Simon,

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1 "All queries concerning firebreak were addressed and
 2 closed out. Building control have stated they do not
 3 need to return until we begin to hang panels."
 4 Is that what happened with the request?
 5 A. Yeah, quite possibly, yeah. Yes, well, you can see it
 6 is, yes.
 7 Q. Is that where it was left, do you think?
 8 A. Yeah, if I'm being told it's closed out and
 9 Building Control don't raise it again, then yes.
 10 Q. Can you explain to us why you passed this request on to
 11 Danny Osgood?
 12 A. Because Danny was the external manager.
 13 Q. Right.
 14 When he came back to you on 19 June, were you
 15 satisfied with his response?
 16 A. Yes.
 17 Q. Did you not want to know from him when the firebreaks
 18 questions had been addressed and closed out, and how?
 19 A. I would probably have had a conversation. He was
 20 sitting away from me -- 2 metres away, so I probably
 21 would have had a conversation, rather than an email,
 22 which in hindsight would have been much better.
 23 Q. Do you know why the clerk of works thought that there
 24 were still outstanding questions when in fact, according
 25 to Mr Osgood, there weren't, in relation to firebreaks?

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1 A. No.
 2 Q. Now, we can see that Mr Osgood said "Building control
 3 have stated that they do not need to return until we
 4 begin to hang panels". Now, this is obviously quite
 5 close to the time you left Rydon, but do you know or
 6 were you involved in Building Control's return to site,
 7 or was that after your time?
 8 A. I think that was after my time, to be honest.
 9 Q. Now, I want to turn to a slightly different topic, which
 10 is the cladding installation RAMS. Can you look,
 11 please, at --
 12 SIR MARTIN MOORE-BICK: Mr Millett, how are you getting on
 13 generally?
 14 MR MILLETT: Quite well. This is a very short topic.
 15 I think there are a lot of quite short topics, but we're
 16 getting on pretty well. I'm happy to take a break now
 17 if you want to.
 18 SIR MARTIN MOORE-BICK: Well, we have been running for
 19 an hour. We would normally run for another hour.
 20 MR MILLETT: All right. I am happy to take a break now.
 21 SIR MARTIN MOORE-BICK: If I say quarter of an hour, will
 22 that put you in difficulty?
 23 MR MILLETT: No, I don't think so.
 24 SIR MARTIN MOORE-BICK: That's what we will do, then.
 25 We will have another break, Mr O'Connor.

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1 THE WITNESS: Excellent.
 2 SIR MARTIN MOORE-BICK: We will come back at 3.15. If you
 3 go with the usher now, please don't talk to anyone about
 4 your evidence.
 5 THE WITNESS: No worries.
 6 SIR MARTIN MOORE-BICK: Thank you very much.
 7 (Pause)
 8 Right, 3.15, then, please.
 9 (3.00 pm)
 10 (A short break)
 11 (3.15 pm)
 12 SIR MARTIN MOORE-BICK: All right, Mr O'Connor?
 13 THE WITNESS: Yes.
 14 SIR MARTIN MOORE-BICK: Very good.
 15 MR MILLETT: Thank you, Mr Chairman.
 16 Mr O'Connor, can I ask you a question about your job
 17 description: when you were promoted to project manager,
 18 when you were given that role at Rydon, were you ever
 19 given a written job description?
 20 A. No, not that I recall.
 21 Q. Did anybody sit you down and say, "Right, Simon, this is
 22 your job description"?
 23 A. No.
 24 Q. Can I ask you to look at {RYD00044094}, and I want to
 25 ask you about the cladding installation RAMS, the risk

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1 assessment method statement. This is an email,
 2 Ben Bailey to Daniel Osgood, 18 June 2015, copied to
 3 you, Mr O'Connor, and there are a couple of attachments,
 4 one of which, as is clear from the text of the email,
 5 says:
 6 "RAMS for the column cladding installation attached
 7 for your files /comment."
 8 Do you remember receiving that?
 9 A. I did obviously, but no, I don't remember.
 10 Q. Right.
 11 Let's look at the attachment, {RYD00044095}. Can
 12 I ask you to turn to page 1 to see it first of all.
 13 It's a Harley document, "Method Statement", "Installing
 14 Column Cladding":
 15 "Project Manager: Ben Bailey.
 16 "Site Foreman: Mark Osborne (Taff)."
 17 And at the bottom of page 1, it says:
 18 "This method statement relates to the installation
 19 of the vertical column cladding panels on the project."
 20 Does that trigger a recollection, my showing you
 21 that first page of this document?
 22 A. I can't see what you have just read, sorry.
 23 Q. Well, can you see the first page of it?
 24 A. Yes.
 25 Q. I just read to you "Project Manager: Ben Bailey", middle

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1 of the page, "Site Foreman: Mark Osborne (Taff)", and at
 2 the bottom:
 3 "This method statement relates to the installation
 4 of the vertical column cladding panels on the project."
 5 A. Sorry, yeah, I can see that now.
 6 Q. Does my showing you this first page of this document now
 7 trigger a recollection about it?
 8 A. No.
 9 Q. Page 3 {RYD00044095/3}, please, I would like to look at
 10 item 9 to 10 with you. Item 9 says:
 11 "When all the brackets have been installed on the
 12 cladding rails, operatives will install the vertical
 13 firebreaks in the same position as the internal party
 14 walls (marked up drawing attached), making sure that the
 15 joints are butted tightly together and the joints taped
 16 with adhesive backed foil 'O' tape. Joints against the
 17 existing concrete should be sealed with suitable
 18 intumescent mastic."
 19 Then it goes on at 10:
 20 "Operatives will then fit the 100mm thick insulation
 21 around the brackets and firebreaks, taping joints with a
 22 class 0 adhesive foil tape where necessary."
 23 Did you take any steps to supervise subcontractors
 24 during your time as project manager to ensure that the
 25 cladding was fitted as per this RAMS?

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1 A. This is the RAMS for the vertical columns.
 2 Q. Yes.
 3 A. I wasn't on site for any works on the vertical columns.
 4 Q. We can see that the date of this document, and perhaps
 5 I should have shown you that, was during your time.
 6 It's dated 18 June 2015, so it was produced during your
 7 time. It was sent to you.
 8 My question -- I'll ask it again -- is: did you take
 9 any steps to -- well, let me try it a different way: did
 10 you take any steps to prepare yourself to make sure that
 11 subcontractors complied with this?
 12 A. Not at the time, no. We would have done when the work
 13 was going ahead.
 14 Q. When you left the project, who did you hand over to?
 15 A. Simon Lawrence.
 16 Q. Did you hand him this document and ask him to carry on
 17 with it and make sure that installers were supervised to
 18 make sure that they complied with items 9 and 10 that
 19 I've shown you?
 20 A. Not particularly, but that would be the norm, to make
 21 sure that people are complying with the RAMS.
 22 Q. Can I ask you to look at the last page of this document,
 23 page 5 {RYD00044095/5}. This is where it says that the
 24 subcontractors are asked to sign and confirm they have
 25 read and understood the instructions and safety

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1 information.
 2 During your time on the project, did that happen?
 3 A. To this document?
 4 Q. Yes.
 5 A. I wouldn't imagine so, no.
 6 Q. Right.
 7 I want to ask you one or two questions about
 8 workmanship, please. Can you please go to
 9 {RYD00027752}. This is an email to you from
 10 Claire Williams, and a few others, concerning some
 11 workmanship issues at Grenfell Tower, and it's dated
 12 15 January 2015. It's also sent to Jason North and it's
 13 copied to Simon Lawrence and Siobhan Rumble and
 14 Janice Jones at the TMO:
 15 "Cladding fixing - stopping people sleeping -
 16 2 elevations reporting."
 17 She says to you:
 18 "Simon.
 19 "As my voicemail of this morning- 2 complaints from
 20 generally reliable residents: flats 56 and 31. Please
 21 let me know what we are doing about this, and we need to
 22 put up a notice in the communal areas to show we are
 23 addressing this. I have copied in the housing office as
 24 they will be taking calls too!"
 25 Then there is a capitalised message, "Hello Claire",

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1 which she is passing on from the occupant of number 56:
 2 "Today part of the cladding frame was fitted on the
 3 east side and the frames are now rattling away in the
 4 wind all night creating a lot of disturbance. Either
 5 they have not been fastened properly or more seriously
 6 the threaded metal studs are coming off.
 7 "This is quite a serious situation. This is shoddy
 8 workmanship and is posing a great danger to everyone
 9 concerned.
 10 "Please look into this on an urgent basis and let
 11 the residents know what is going. I am sure you or
 12 Rydons will receive complaints from other residents
 13 also."
 14 First question is: was it common for Claire Williams
 15 to ring you in respect of workmanship issues?
 16 A. Not generally, no. She would ring me about various
 17 issues, but not -- not generally.
 18 Q. The message that she was passing on from this resident
 19 was that this was shoddy workmanship and was posing
 20 a great danger to everyone concerned.
 21 What steps did you take to go and investigate the
 22 allegation of shoddy workmanship?
 23 A. I think in this situation I went there myself.
 24 Q. Right.
 25 Let's see if we can pursue the story a bit further.

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1 {RYD00088038}, please. This is an email chain, which
 2 includes you, the next day. So as you can see,
 3 16 January, and it starts at the bottom of page 1 where
 4 Claire Williams writes to Simon Lawrence, copied to you,
 5 Mr O'Connor, and also Peter Maddison of the TMO:
 6 "Simon
 7 "Can I please have a formal response to the comments
 8 below by end of play on Monday 19 Jan?
 9 "I know that Simon O'Connor had had Harley check on
 10 15 January that all was well, but I do not need to have
 11 any misinformation out there about the fixings to
 12 Grenfell which would undermine confidence in the
 13 project."
 14 You pass this on to Rob Maxwell, copied to
 15 Simon Lawrence:
 16 "Rob,
 17 "We will need you to investigate this allegation and
 18 put together a professional and accurate response to
 19 this as soon as possible."
 20 Then you also send a message to Mr Grint, "Subject:
 21 cladding rattling":
 22 "FYI.
 23 "Can you please chase this up on Monday."
 24 Did you ask Harley to check?
 25 A. Check what the rattling was?

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1 Q. Check the rattling --
 2 A. Yes.
 3 Q. -- and the fixing of the cladding?
 4 Did you ever get an explanation about why it was
 5 that the panels were flapping about in the wind?
 6 A. I don't think it was panels, I think it was rails, and
 7 it's common practice to pin a rail on a building of that
 8 size, if you don't fix it permanently, you pin it, where
 9 you're lining it up, and they will rattle.
 10 Q. Did you get a report back from Harley that they had
 11 checked and all was well?
 12 A. Yes, I believe that's what they told me. I'm not sure
 13 in writing, but yeah.
 14 Q. Can we look at {RYD00028016}, please. This is an email
 15 on the same day where Claire Williams sends
 16 Simon Lawrence a message, copying you in, and also
 17 Christina Stephanou, on the same subject, "cladding
 18 rattling", and she says:
 19 "Simon [that's Simon Lawrence]
 20 "I think that as well as having your response, it
 21 would be useful for Rydon to visit this home and look at
 22 the fixings and talk with the resident. The Patel
 23 family are leaseholders, and have been to every
 24 consultation, they are very conscientious about being
 25 up-to-date with information and I want to be able to

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1 reassure them. Currently you understand they have some
 2 serious concerns.
 3 "Please confirm ...
 4 "Claire Williams."
 5 Can I ask you why this workmanship issue wasn't
 6 picked up by Rydon's internal processes?
 7 A. Because it wasn't complete.
 8 Q. Does that mean that you wouldn't actually inspect for
 9 quality of workmanship until the work was complete?
 10 A. Well, I think it's unfair to snag work that's in
 11 progress.
 12 SIR MARTIN MOORE-BICK: Well, if I understood what you said
 13 a moment ago, work, as you say, was in progress. It
 14 hadn't been finally fixed.
 15 A. Yes.
 16 SIR MARTIN MOORE-BICK: Is that the point?
 17 A. Yeah, that's what I'm saying, yeah. So it was pinned
 18 into place but not actually fixed.
 19 SIR MARTIN MOORE-BICK: It's unfortunate that it's left
 20 pinned into place so that it can rattle in the wind.
 21 A. Yes.
 22 SIR MARTIN MOORE-BICK: Whether it should have been or not
 23 is another question, but it was not finally fixed.
 24 A. It was secure, it wasn't going anywhere, but I can
 25 understand, being -- it was really windy around the

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1 tower, and I can understand the frustrations of the
 2 residents trying to sleep with metal to metal clanging
 3 together all night long. Yeah, I understand that.
 4 MR MILLETT: So why were partly constructed pieces of
 5 structure left in a way that would disturb residents?
 6 A. It wasn't done intentionally, and I am fairly sure that
 7 after this we managed to get a system where we could
 8 string from top to bottom and affix it more rigidly.
 9 Q. Do you remember whether anybody from Rydon did visit
 10 this occupant in their flat and look at the fixings and
 11 talk with the resident?
 12 A. That would probably have been myself and Christina.
 13 Q. Do you remember doing that?
 14 A. I don't, but I would generally go and see leaseholders
 15 that showed concern.
 16 Q. Right.
 17 Can we look at {RYD00028018}, please. This is
 18 an email only a few minutes later, in fact, where there
 19 are some photographs attached to it, and Claire Williams
 20 says to Simon Lawrence, copied to you, cladding
 21 rattling:
 22 "Simons [that's to both of you]
 23 "Is there not a levelling mechanism- washers or
 24 similar? The photo shows a clear gap between the
 25 cladding angle and the wall, which presumably varies

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1 from elevation to elevation ..."
 2 Did you know the answer to the question she was
 3 asking?
 4 A. No. I don't think so. I don't recall that email.
 5 I mean, the building -- I'm guessing she's talking about
 6 the in and out of the frame, but the building was
 7 28 storeys high and it varied, so she's probably right,
 8 there probably would be gaps, but I don't remember
 9 responding to it at all.
 10 Q. Did the complaint generally give you cause for concern
 11 about Harley's work?
 12 A. No.
 13 Q. Did you agree with Claire Williams' assessment that the
 14 photograph provided by Mr Patel showed that there was
 15 a clear gap between the cladding angle and the wall?
 16 A. I don't think I responded.
 17 Q. No, that may be, but in your mind, did you agree with
 18 Claire Williams' assessment?
 19 A. I can't recall, honestly, if I did agree or didn't
 20 agree. Claire would quite often send me things that
 21 weren't relevant.
 22 Q. Did this exchange and this event provoke you to ensure
 23 that Harley were working to a proper standard of
 24 workmanship?
 25 A. No, I thought they were. I think I showed my concerns

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1 of them in an earlier email when they first started the
 2 project.
 3 Q. Can we look at {RYD00028021}. Let's look at the top of
 4 the page together. This is you to Claire Williams,
 5 16 January, same subject, and also to Simon Lawrence and
 6 Peter Maddison, "cladding rattling":
 7 "Afternoon Claire,
 8 "Following your original e-mail yesterday we have
 9 already requested all fixing were checked immediately
 10 and a written response provided.
 11 "As discussed I will visit Mr Patel on Monday to
 12 answer any queries or concerns he may have."
 13 Did you ever receive a response from Harley?
 14 A. I believe I probably did.
 15 Q. Did you put any additional safeguards in place to make
 16 sure that Harley were fitting to a proper and safe
 17 standard as a response of this complaint?
 18 A. I don't think they were fitting to an unsafe standard,
 19 at this point, not with the rails and whatnot, but I did
 20 ask them to make sure that they fixed rails adequately
 21 so they didn't rattle around in the evening to make more
 22 residents complain or have concern.
 23 Q. Did you go back and carry out a final inspection to make
 24 sure that Harley had put this problem right?
 25 A. I probably wouldn't have done, but one of the external

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1 managers would have done.
 2 Q. Can I ask you then to look at {RYD00039173}, and I would
 3 like you to have pages 1 and 2 {RYD00039173/2} of this
 4 email string put up together. It's an email between you
 5 and Lynda Prentice of the TMO on 17 April 2015, and
 6 I would like you to look at the bottom of page 1 and the
 7 top of page 2. She writes to you on 17 April 2015:
 8 "Re: 185
 9 "Hi Simon
 10 "I just received a text from David Collins in flat
 11 185 stating that he found a part of the window
 12 installation hanging loose this morning. He has taken
 13 it into his house as he didn't want it to fall 18 floors
 14 and also that there is some polythene on the back of one
 15 of the cladding panels which is blowing in the wind and
 16 has nearly come off (on the north facing side) he has
 17 asked if this can be taken off safely."
 18 Now, your response was to forward the message to
 19 Ben Bailey at Harleys, as we can see on page 1, if you
 20 look at that:
 21 "Ben,
 22 "Can you deal with this please, 185 is a problem
 23 property and is questioning the quality of the install .
 24 "He will shout this from the roof tops if not
 25 resolved promptly."

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1 On what criteria did you judge whether a property
 2 was "a problem property", Mr O'Connor?
 3 A. Yeah, I think my wording probably wasn't great there.
 4 185 was actually owned by an absent leaseholder, and he
 5 had done a huge amount of work in his property prior to
 6 us coming along, with dropped ceilings and, you know,
 7 top of the range surround sound, and they really didn't
 8 want all the pipework to come through their front door
 9 and across their ceilings that they had -- they had made
 10 a huge effort in that flat and they just wasn't happy
 11 with ... and I think, in honesty, I don't think they
 12 were told by the TMO exactly what they were getting in
 13 the first place, so what they actually got was something
 14 different than what was offered in the beginning.
 15 Q. So when you say "problem property", do you mean problem
 16 occupant?
 17 A. No, I mean, it was a problem -- well, "problem" is
 18 probably the wrong word, but it was a difficult property
 19 because there was so much done to it, you know, that we
 20 had to try and get over. The occupant himself was okay.
 21 Q. It looks as if what you are saying is that 185 is
 22 a problem property because the occupant is questioning
 23 the quality of the installation .
 24 A. No, not at all .
 25 Q. Is that what you meant?

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1 A. No, not at all .
 2 Q. Right.
 3 Then you go on to say:
 4 "He will shout this from the roof tops if not
 5 resolved promptly."
 6 Is it fair to say that --
 7 A. Sorry.
 8 Q. Sorry, did you want to say something?
 9 Is it fair to say that you are expressing concern
 10 that if Rydon doesn't remedy this problem promptly,
 11 Mr Collins would share his concerns with other
 12 residents?
 13 A. He was an active part of the Grenfell blog, an active
 14 part of the group that sort of represented the block,
 15 and I think, you know, it's positive for us to try and,
 16 you know, keep that enclosed rather than raising
 17 concerns that I didn't feel were, you know, massive
 18 concerns.
 19 Q. Did you not think that his concern was worth taking
 20 seriously?
 21 A. His concern of?
 22 Q. Well, that he has expressed, or that she has expressed
 23 as recorded to you, in the text that Lynda Prentice had
 24 received from him?
 25 A. Yeah, I mean, the plastic coming off is the plastic

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1 backing that was on every single panel, and that doesn't
 2 come off until you're coming to the close of the
 3 project, and the piece of thing he was saying was
 4 hanging off I think was mastic. I mean, there was
 5 nothing I would say that was fundamentally wrong.
 6 Q. So you thought he might overreact?
 7 A. Yeah, possibly.
 8 Q. Ben Bailey says in his response at the very top there:
 9 "Yep I'll ask Taff to go and have a look."
 10 Do you know whether Taff did?
 11 A. Yes, I think Taff did, and I think I also went up to see
 12 the resident as well.
 13 Q. Did you have a discussion with the resident?
 14 A. Yes.
 15 Q. What was the result of that?
 16 A. I think he was happy with what I was explaining to him.
 17 I think it's what I've just explained to you, really .
 18 I didn't see a fundamental problem with what was --
 19 I mean, I understand again the noise was probably more
 20 annoying than anything else, of the plastic flapping
 21 around outside the window.
 22 Q. Can I ask you to look at {RYD00039198}. It's a slightly
 23 different topic. It's an email from Simon Lawrence to
 24 you of 17 April 2015, so exactly the same day, but not
 25 on the subject of plastic backing.

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1 I would like you to look at the second paragraph,
 2 please, and he says:
 3 "You also need to expand/breakdown progress tasks in
 4 other areas as well. It needs to give the Client a
 5 fuller picture of the works completed. Just counting
 6 windows isn't good enough. Looks like you have just
 7 done bear minimum to fob Client off and that's not the
 8 impression we want to portray.
 9 "Have another go and send it back across this
 10 afternoon please."
 11 Did you agree with Mr Lawrence's assessment of your
 12 work?
 13 A. No.
 14 Q. Is it fair to say that Mr Lawrence, rightly or wrongly,
 15 wasn't satisfied with your performance on this issue?
 16 A. Yes.
 17 Q. Do you know what gave rise to Mr Lawrence's
 18 dissatisfaction as reflected in his email to you here?
 19 A. I think his expectations were different to mine.
 20 Q. In what way?
 21 A. In the way that when I'm present -- when we're
 22 presenting to a client, I actually want to hear how many
 23 windows had been done, not how many floors and what
 24 flats or east and west. I think that just confuses the
 25 matter.

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1 Q. At this point, was the project under time pressure?
 2 A. Yes.
 3 Q. Cost pressure?
 4 A. I wouldn't be able to comment, I don't know.
 5 Q. Can I ask you to look at {RYD00042487}. This is another
 6 email from Simon Lawrence, a little bit later in the
 7 year, 27 May 2015, to you and to Danny Osgood. We
 8 looked at this yesterday with Mr Lawrence when he gave
 9 evidence, and it's about the show flat. He says:
 10 "Gents.
 11 "I've sent an email tonight to Mark explaining my
 12 thoughts and asking him to call me when he is on site
 13 tomorrow. I thought it best to not copy everyone in so
 14 hopefully he doesn't get defensive about the work.
 15 "I've also made Steve Blake aware so he isn't
 16 shocked when he visits tomorrow.
 17 "Overall I am extremely upset that we have got to
 18 today and in my opinion are nowhere near having the flat
 19 in a show condition. It shouldn't take me to visit and
 20 noticed the issues straight away. Apart from being
 21 unfinished in areas the bouncy window board is a
 22 disaster. I still can't understand how it hasn't been
 23 noticed before.
 24 "I'm expecting to be called to account from Steve
 25 and quite frankly I haven't got any good excuses. The

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1 only saving grace is that the Client's Director isn't
 2 planning on visiting tomorrow as first thought.
 3 Whatever happens that flat has got to be top notch ready
 4 for inspection by the client next week. I expect
 5 nothing short of a quality job.
 6 "Please ensure this happens. It's our last chance."
 7 Why was Mr Lawrence extremely upset, Mr O'Connor?
 8 A. Again, because he hadn't got what he wanted, what he was
 9 expecting.
 10 Q. Is it fair to say that, looked at in general, he was
 11 taking you to task for falling short in quality terms?
 12 A. Yeah.
 13 Q. Why was it Rydon's last chance? Last chance before
 14 what?
 15 A. I don't know. I mean, this was a show flat, it's not --
 16 and it was empty, so I don't understand why it's our
 17 last chance.
 18 Q. Can you explain how you had let Mr Lawrence down, as he
 19 describes in this email?
 20 A. I think, like I said, we -- you know, we had different
 21 visions on what was happening, and he would also get
 22 involved and give us ideas that sometimes were not
 23 achievable.
 24 Q. Can you explain how the show flat had been left in such
 25 an unfinished state and that Mr Lawrence's expectations

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1 were so disappointed?
 2 A. It wasn't in such an unfinished state.
 3 Q. So do I take it from that that you disagree with his
 4 assessment?
 5 A. Yes.
 6 Q. Did you take that up with him?
 7 A. Probably, yes.
 8 Q. In what way did you take it up with Mr Lawrence? Did
 9 you email him, did you ring him? What did you do?
 10 A. I think he was going to be on site the following week,
 11 so I would have spoken to him then.
 12 Q. And what was the upshot of that, do you remember?
 13 A. I can't, if I'm honest. I think this -- it was ready
 14 for the next -- for the client the next week, as far as
 15 I remember.
 16 Q. We know you left Rydon in September 2015 after working
 17 out your notice period, and you were transferred in fact
 18 from Grenfell to Lea Bridge in July 2015.
 19 Were you taken off the Grenfell Tower project
 20 because of quality issues?
 21 A. I was asked to be removed.
 22 Q. You were asked to be removed, and do you know why that
 23 was?
 24 A. Because I had resigned and I didn't think I could fulfil
 25 my obligations there. Knowing it was still going to

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1 continue for a long time, it was best someone took it
 2 over at that point.
 3 Q. Why were you moved to the Lea Bridge project? Why did
 4 you work your notice out on the Lea Bridge project?
 5 A. That's where I was moved to.
 6 Q. Yes, but why?
 7 A. I don't know why, it was a -- I got an email from
 8 Steve Blake asking me to report to Lea Bridge.
 9 Q. During your work on the project, did you become aware at
 10 any time of problems concerning the extent of gaps
 11 between the edge of the concrete window enclosure and
 12 the edge of the new window frames that were going in on
 13 the project?
 14 A. Sorry, can you repeat that?
 15 Q. Yes.
 16 Did you ever become aware during your time as
 17 project manager of any problems about gaps between the
 18 edge of the concrete window enclosure and the edge of
 19 the new window frames, between the concrete and the
 20 frames?
 21 A. Yeah, is this the offset angle on the corner of the
 22 window edge?
 23 Q. Well, I'm asking you what I had rather thought was
 24 a simpler question than that.
 25 A. Sorry, I must have interpreted it wrong.

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1 Q. Did you ever become aware of any issue, any problems
 2 about the size of gaps between the edge of the concrete
 3 window enclosure and the edge of the window frames, the
 4 side of the new window frames?
 5 A. I still don't understand where you're going, I don't --
 6 Q. Well, never mind where I'm going. Let me try it a
 7 different way.
 8 Did you ever become aware of any problems concerning
 9 gaps between the structure, the concrete structure, and
 10 the window frames?
 11 A. No, I was -- I was aware of the gaps where the old frame
 12 remained in, but ... no, I don't -- I don't recall.
 13 Q. Do you remember any problems about gaps between the
 14 newly installed windows and the old timber window
 15 surrounds?
 16 A. Yeah, that's what I was just referring to.
 17 Q. I see. How did you come to know about those issues?
 18 A. I think from doing the show flat.
 19 Q. I see. What about before that?
 20 A. I don't think it was thought about before that.
 21 Q. Right. What did you do about those gaps?
 22 A. Erm ...
 23 Q. The gaps between the newly installed windows and the old
 24 timber window surrounds.
 25 A. The upstands, are you referring to the upstands, sorry?

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1 Q. Yes.
 2 A. That's the whole thing with Simon Lawrence not being
 3 happy because it was bouncy, so I think there was
 4 various options floated around.
 5 Q. Right. My question really is: when did you become aware
 6 of those problems? Well, let me ask it this way: was it
 7 only with the show flat or was it more of a generic
 8 problem?
 9 A. I think once we found it on the show flat, I think we
 10 was going to find it everywhere.
 11 Q. Right. And what did you do about it?
 12 A. I think we went to a number of companies to try and get
 13 the trimming done on the internals.
 14 Q. How did that end up?
 15 A. It ended up with SDP doing.
 16 Q. Can I ask you to go to {HAR00003691}, please. This is
 17 an email from Mr Lawrence to Studio E and Harley,
 18 16 October 2014 and you're copied in on that:
 19 "Gents,
 20 "I think we will definitely have an issue with
 21 kitchen window. We roughly marked it out in Flat 145
 22 and it oversails kitchen/lounge screen by around 200mm.
 23 "It looks bad.
 24 "Regards
 25 "Simon."

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1 What did you understand him to mean by
 2 "oversailing"?
 3 A. There was a wall, the kitchen wall, and I think the
 4 window was there (indicated).
 5 Q. Right.
 6 Was this a problem caused by or connected to the
 7 gaps between the concrete window enclosure and the edge
 8 of the new window frames?
 9 A. No, I think this was caused by -- the windows originally
 10 were going to be -- the concrete within the structure
 11 was going to be cut back to make the windows bigger, and
 12 I think that's what -- because that didn't happen,
 13 I think that's what caused this.
 14 SIR MARTIN MOORE-BICK: When you refer to oversailing, do
 15 you mean the window frame structurally was wider than
 16 the opening into which it ought to fit?
 17 A. Yeah, so you had the wall here (indicated), and so from
 18 the outside you would have seen the wall from the
 19 window.
 20 SIR MARTIN MOORE-BICK: Thank you.
 21 MR MILLETT: Do you remember whether you received a response
 22 from Harley in respect of this question?
 23 A. Not absolutely in my head, no.
 24 Q. What about Studio E?
 25 A. I think there was a response, but I don't -- I can't

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1 recall what it was.
 2 Q. Right.
 3 Looking at this gap, then, between the edge of the
 4 concrete window enclosures and the edge of the
 5 replacement frames, were you aware that the gap at the
 6 column was specified in the design drawings as varying
 7 between 35 millimetres and 90 millimetres?
 8 A. Not at the time, no.
 9 Q. So it would follow that you weren't aware that it was in
 10 some places significantly more than the 90 millimetres
 11 suggested in the drawings?
 12 A. No.
 13 SIR MARTIN MOORE-BICK: Mr Millett, I wonder if we're not
 14 slightly at cross-purposes here. I may be wrong, but
 15 I thought the gap to which you just referred was a gap;
 16 what I understand Mr O'Connor to have described in this
 17 problem is that the windows were too wide, ie there
 18 wasn't a gap, there was an overprojection.
 19 MR MILLETT: Yes, I think there are two different questions.
 20 SIR MARTIN MOORE-BICK: Perhaps we just ought to clarify
 21 that.
 22 MR MILLETT: Yes.
 23 I was asking you earlier -- I was trying to
 24 establish that there were two gap problems: the first is
 25 between the edge of the concrete window enclosures and

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1 the edge of the replacement frames, and the second one
 2 was in between the edge of the concrete window
 3 enclosures and the edge of the frames at the jamb or the
 4 infill panel. Do you see? There are two different
 5 spaces or places where there are gaps, and I just wanted
 6 to ask you one or two questions about that.
 7 A. Mm-hm.
 8 Q. Let's see if I can take this a bit more quickly.
 9 Can you go to {BLAS00000009/13}, and look at
 10 figure 9.9, please. This is a photograph showing
 11 unfilled gaps in the internal window construction at
 12 cill level. This is flat 13. She has measured the gap
 13 between the jamb of the new window frame and the
 14 concrete enclosure on the column at 120 millimetres.
 15 Did you know that the gaps were that big?
 16 A. At the time, no.
 17 Q. Right.
 18 Now, in fact, we can see on this photograph a rubber
 19 membrane, a black rubber membrane. Do you see?
 20 A. Yes.
 21 Q. Behind it. That's an EPDM membrane. We can also see
 22 that a gap has been intermittently filled with adhesive
 23 foam.
 24 Did you at the time know anything about how the gap
 25 that's measured there, the 120-millimetre wide gap, was

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1 going to be filled ?
 2 A. No. If this was on flat 13, that was so far down the
 3 building I wouldn't have been there, but no, I wasn't
 4 aware.
 5 Q. But in general terms -- I know this is flat 13 as an
 6 example -- were you aware how this gap was to be filled ?
 7 A. The one going right down?
 8 Q. Well, the one that's identified by the double arrow,
 9 which is 120 millimetres wide.
 10 A. From memory it was some sort of insulation, I believe.
 11 Q. Do you know or from memory can you tell us what
 12 that insulation was to be, what product that was?
 13 A. You see, it's not from memory, but I would say probably
 14 Rockwool. I wouldn't know, but that's what I would look
 15 at it now and think. But I can't say back then what
 16 I would have thought.
 17 Q. Right.
 18 Now, there is another gap in respect of the gap
 19 between the edge of the concrete window enclosures and
 20 the edge of the replacement frames at the jamb or infill
 21 panel. Let's look at another photograph. It's
 22 {BLAS00000008/20}. I would like to look at figure 8.19
 23 there, the photograph at the top of the page,
 24 Mr O'Connor, can you see that?
 25 A. I can.

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1 Q. And you can see a cavity .
 2 A. I can.
 3 Q. Can you see that there is an original concrete infill
 4 panel, and then there is a little cavity uninterrupted
 5 to opposite window, and then new infill panel on the
 6 left-hand side, insulating core panel; do you see that?
 7 A. Yeah.
 8 Q. If we go to another picture, which is
 9 {BLAS00000009/20} -- I wonder if we could have that on
 10 two pages -- which is another chapter of Dr Lane's
 11 report. I would like to look at figure 9.13. If we
 12 could have those on two pages, that would be good.
 13 You can see that the cavity in the jamb of the
 14 window between the concrete infill panel and the new
 15 insulating core there has been packed with combustible
 16 insulation .
 17 A. Yeah.
 18 Q. We can see from the markings on the foil face that it's
 19 Celotex. Do you see that?
 20 A. I do.
 21 Q. Finally, can I just show you one other thing. I've
 22 shown you those. {PHYR00000004/24}, and let's look at
 23 figures 4.11 and 4.12, which are on the same -- they're
 24 the same figures in the same thing, photos taken by HKS
 25 in Grenfell Tower in May last year, so this is

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1 post-fire, of course.
 2 You can see there that combustible insulation, which
 3 is Celotex and Kingspan, has been packed into the cavity
 4 at the jamb of the window between the concrete infill
 5 panel and the new insulating core panel. Can you see
 6 that?
 7 A. Yes.
 8 Q. Those are the gaps I just want to ask you about.
 9 In your time, did you consider or did you know
 10 whether this method of filling these gaps was to be
 11 used?
 12 A. Not that I'm aware of, but I may have been, but not that
 13 I'm aware of.
 14 Q. Did you consider whether the designs that you saw
 15 provided for this method of filling these gaps?
 16 A. I don't recall .
 17 Q. Did you ever consider the fire risks of filling these
 18 gaps with that kind of material?
 19 A. Celotex -- the whole building was covered in Celotex, so
 20 I don't ... I probably wouldn't have thought that to be
 21 particularly wrong. I know now, but at the time,
 22 you know, the whole building was covered in them.
 23 Q. Did you or anybody else to your knowledge at Rydon ever
 24 ask whether this approach of filling these gaps I've
 25 shown you with this material I've shown you was

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1 compliant with the Building Regulations?
 2 A. I doubt it .
 3 Q. Final gap, which is the gap between the head and the
 4 cill of the window frames, and the old timber window
 5 surrounds, I just want to look at two more documents.
 6 {BLAS00000009/6}, please, and I would like you to look
 7 at figure 9.3. We can see here that the insulation, if
 8 you look at it, has been packed at the head of the
 9 window -- so this is the head of the window -- to close
 10 the gap between the head of the newly installed frame
 11 and the original timber window reveal lining. Can you
 12 see that?
 13 A. I can.
 14 Q. Yes, and that insulation would have been packed under
 15 the lining to the newly installed frame, which I think
 16 was a uPVC lining, wasn't it?
 17 A. Yes.
 18 Q. Yes.
 19 Now, let's just look at {BLAS00000008/17}, please,
 20 and I would like you to go to figure 8.16, at the bottom
 21 of that page. Again, this is a photograph, combustible
 22 insulation materials, and this is flat 15 living room,
 23 this is from underside of internal finishes, and Dr Lane
 24 notes that combustible insulation or filler material was
 25 used behind the internal finishes, window finishes,

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1 cills , jambs and heads. There was a zig-zag pattern
 2 showing an internal finish with glue.
 3 First of all , were you aware that gaps at the head
 4 and cill of the newly installed window frames and in the
 5 original timber reveal lining were being filled in the
 6 way these photographs show?
 7 A. I knew that the original timber frame was staying in and
 8 they were being packed out using that material, yes.
 9 Q. You did know that?
 10 A. Celotex, probably.
 11 Q. Right.
 12 Did you make any attempt to enquire whether filling
 13 those gaps with this insulation material complied with
 14 Building Regulations?
 15 A. I think, like I said a little while ago, I didn't see it
 16 particularly as an issue, as the whole building was
 17 being covered in it and someone far more intelligent
 18 than me had designed it.
 19 Q. Did you make any attempt to enquire whether filling the
 20 gaps with this material in this way was an unplanned
 21 ad hoc measure to deal with unanticipated gaps?
 22 A. I don't think so, no.
 23 Q. Were these gaps that we've seen here something you
 24 expected on this project, or didn't expect?
 25 A. I don't think I would have expected them to be as

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1 different as you've shown.
 2 Q. Right. Does it follow that you therefore didn't expect
 3 to have to fill them in the way that they were filled ,
 4 or with the product with which they were filled ?
 5 A. Yes.
 6 Q. I just want to ask you some questions about substitution
 7 of Celotex for Rockwool around the windows.
 8 Can I ask you to go to {SEA00003040/5}. This is
 9 a Harley drawing which is showing in the middle
 10 "Insulation by others", can you see that?
 11 A. I can.
 12 Q. This is a document, just to give it a date, dated
 13 20 August 2014, and it's marked "Conforms to design
 14 intent, approved for construction". This is a document
 15 you would have seen, presumably, in order to pass to
 16 Harley for them to construct?
 17 A. Yeah, it was Harley's drawing.
 18 Q. Indeed. But it would have passed through your hands as
 19 project manager?
 20 A. Yeah.
 21 Q. Yes.
 22 Now, you can see in the middle of the page there it
 23 says "Insulation by others" in that space, where you can
 24 see --
 25 A. Yeah.

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1 Q. -- the gap.
 2 Who did you consider was responsible for choosing
 3 that insulation material?
 4 A. I can't recall . I would imagine Studio E or Harley --
 5 no, Harley wouldn't be doing it , so probably Studio E.
 6 Q. You say Harley wouldn't be doing it ; is that because --
 7 A. It says "Insulation by others" on a Harley drawing,
 8 so ...
 9 Q. Exactly, and is that because this was part of the inside
 10 and not part of the envelope?
 11 A. Yes.
 12 Q. That's what Mr Lawrence said yesterday. I see.
 13 Now, you were the project manager; who were the
 14 others that Harley was referring to?
 15 A. Others, not Harley.
 16 Q. Well, clearly , but who were they?
 17 A. I don't know. It's just -- it's just -- I think that's
 18 just a, "We're not doing it" comment, not a --
 19 Q. Can I ask you to go to {RYD00040686}. This is an email
 20 of 6 May 2015 from Mark Dixon of SD Plastering to
 21 Adam Marriott, copied to you and Mr Lawrence. He sends
 22 a quotation, "SDP front sheet quote".
 23 Now, you can see that you receive this --
 24 A. Mm-hm.
 25 Q. -- at least as a copy recipient .

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1 Let's look at the quotation, {RYD00088957}. Here is
 2 the quotation. We looked at this with Mr Lawrence, and
 3 he couldn't really help us with it . I wonder if you
 4 can.
 5 Did you open the quotation that Mark Dixon had sent
 6 and look at this document?
 7 A. Quite possibly. I don't recall opening it , because it's
 8 financial , so ... no, I don't recall , but quite
 9 possibly, yes.
 10 Q. I appreciate it was sent to Adam Marriott in the first
 11 instance, but you were copied in on it , and I'm just
 12 really wondering whether you were interested enough to
 13 look at it .
 14 If you look at item 5, left -hand column, it says:
 15 "Place Celotex insulation to reveals and base of
 16 window."
 17 When you got this email and received this document,
 18 did you open it and notice that it specified Celotex
 19 insulation in those locations?
 20 A. Probably not.
 21 Q. Why is that?
 22 A. I can't recall . I don't know.
 23 Q. Was it not your job as project manager to understand
 24 what insulation material was being placed in the inside
 25 parts of the window which did not form part of Harley's

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1 work package?
 2 A. I would imagine this, the left -hand side column, would
 3 have been passed on to somebody else.
 4 Q. As project manager, was it not your job to work out who
 5 it was it was being passed on to?
 6 A. Not particularly , no.
 7 Q. Why is that?
 8 A. Because it was probably something that Simon would have
 9 done because it had financial restraints on it .
 10 Q. You say financial restraints --
 11 A. You know what I mean, there is -- sorry, it 's got the
 12 contract values and stuff on it , it 's not something that
 13 I would usually deal with, and it 's got an element of
 14 design in it , hasn't it?
 15 Q. Can I ask you to go to the NBS specification ,
 16 {SEA00000169/243}, under section P10, paragraph 235,
 17 "Compressible insulation in gaps". You can see that
 18 that is what is said there, and you can see that
 19 underneath that the manufacturer is Rockwool, and the
 20 product reference is provided there, and the material is
 21 mineral wool to BS EN 13162.
 22 Do you remember whether, when you received this
 23 quotation from SD Plastering, you referred back to the
 24 NBS specification to check which insulation products
 25 should be used to pack the window reveals prior to

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1 planning the work to those window reveals?
 2 A. No, I doubt I did.
 3 Q. Why is that?
 4 A. I don't recall .
 5 Q. That was your job, wasn't it?
 6 A. Again, it 's -- yes, it probably was my job, and no,
 7 I don't recall doing it .
 8 Q. Right. Sorry to press, but I would just like to
 9 understand, if it was your job, why you didn't consider
 10 doing it .
 11 A. I don't think it was an active thought of not
 12 considering to do it . I think, as you have put forward,
 13 there was pressures on the project . With an email
 14 traffic the way it was, and stuff going on, I possibly
 15 have missed it or didn't follow it up the way I should
 16 have done.
 17 Q. Right.
 18 Mr Lawrence was asked about this, and he said,
 19 {Day25/61:21}, that it was the decision of all at Rydon
 20 to go forward with Celotex instead of what was used or
 21 identified in the NBS specification . Do you agree with
 22 that?
 23 A. I wouldn't agree with "all ". I mean, I don't know what
 24 he is referring to as "all ".
 25 MR MILLETT: I'm going to ask you some questions about

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1 liaison with Building Control.
 2 Mr Chairman, this is, I think, the penultimate line
 3 of questions I've got, and it is quite short. I have
 4 noticed the time, but we are going to have to take
 5 a break.
 6 SIR MARTIN MOORE-BICK: When you say quite short ...?
 7 MR MILLETT: I have five minutes on Building Control,
 8 depending on the answers, of course, and whether I have
 9 to follow them up, and then a couple of other follow-up
 10 questions on workmanship.
 11 SIR MARTIN MOORE-BICK: We will call that ten.
 12 MR MILLETT: That's probably right.
 13 SIR MARTIN MOORE-BICK: Are you happy to go on for another
 14 ten minutes?
 15 THE WITNESS: Yes.
 16 SIR MARTIN MOORE-BICK: After that, we'll have to have a
 17 break while people review the situation , so we'll see
 18 how we get on.
 19 MR MILLETT: Mr Chairman, thank you.
 20 You say in your statement that the involvement of
 21 Building Control, among others, gave you reassurance
 22 that fire safety was being properly addressed. Just for
 23 your benefit , that 's paragraph 16 of your statement
 24 {RYD00094221/8}.
 25 Do you agree that it was incumbent on Rydon to

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1 ensure that Building Control were provided with full and
 2 proper information about the design and the construction
 3 of the Grenfell Tower refurbishment works?
 4 A. Yes.
 5 Q. And that would include design and construction of the
 6 rainscreen cladding façade?
 7 A. Yes.
 8 Q. And it was incumbent on Rydon to take proper steps to
 9 ensure that Studio E and Harley provided the right
 10 information to Building Control?
 11 A. Yes.
 12 Q. And that that would happen in an orderly, coherent and
 13 timely manner; yes?
 14 A. Usually, yes.
 15 Q. And also information in respect of what products were
 16 going to go on to the building?
 17 A. Yeah, that would form part of the drawings and the spec,
 18 I would imagine, so ...
 19 Q. Yes.
 20 What steps did you take, Mr O'Connor, to ensure that
 21 Building Control were provided with full and proper
 22 information about those matters?
 23 A. I think liaison with Building Control was mainly done
 24 above me.
 25 Q. Right.

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1 Can I ask you to go to {RYD00016989}, this is
 2 an email from Simon Lawrence to John Hoban of RBKC of
 3 3 September 2014, I think we looked at this before in
 4 your evidence, and I asked you I think earlier about
 5 whether you could recall a meeting on site between you
 6 and Mr Hoban. I don't think you could recall that.
 7 We have dug out a note of that meeting, or what we
 8 think might be. This is {RBK00003041/8}, and let's see
 9 if this triggers a recollection.
 10 This is a note of a meeting said to have taken place
 11 on 29 August 2015. You can see the date there, and the
 12 officer was John Hoban:
 13 "Notes: visited site met project manager had brief
 14 discussion about the project, asked to be contacted when
 15 construction works commence on site, gave advice as to
 16 what stages of the works we need to [be] contacted to
 17 inspect, workmen still presently carrying out demolition
 18 works nothing to check at time of visit, demolition
 19 works to go on for some time, also informed the project
 20 manager that I had yet to receive up to date details of
 21 the works."
 22 Was that project manager that he's referring to, do
 23 you think, you?
 24 A. I was the only project manager, so yeah, I would imagine
 25 it would be me.

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1 Q. Do you recall a meeting, now you have seen this note,
 2 with Mr Hoban at the end of August 2014 and discussing
 3 these matters with him?
 4 A. I don't recall it any more than I did this morning, if
 5 I'm honest.
 6 Q. I see. Right, so this doesn't trigger any recollection
 7 in your mind about the matters you discussed with him or
 8 the meeting itself?
 9 A. No.
 10 Q. Right.
 11 Do you remember whether Mr Hoban took any drawings
 12 away from any meeting that he had with you?
 13 A. Not from then. I mean, from reading the documents that
 14 we're reading now, it's quite possible that
 15 Neil Crawford may have brought an A3 file of drawings
 16 for Mr Hoban to take with him, but I don't recall giving
 17 him any drawings.
 18 Q. Right.
 19 Can we stick with this document and go up to page 6
 20 {RBK00003041/6}, please, at the top of the page, where
 21 we can see there is an entry for a meeting or visit on
 22 29 September 2014, where Mr Hoban says he had a brief
 23 discussion:
 24 "... visited site met project manager had brief
 25 discussion about the project, workmen still presently

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1 carrying out demolition works nothing to check at time
 2 of visit ..."
 3 Then he says at the end:
 4 "Also informed the project manager that I had just
 5 received up to date details of the works."
 6 Do you remember that meeting?
 7 A. No.
 8 Q. Do you remember a meeting at about this time when you
 9 did give him up-to-date details of the works or he told
 10 you that he had just received them?
 11 A. I don't think he's saying that I gave them to him,
 12 I think he's saying that he's received them. So, no,
 13 I don't recall that.
 14 Q. Do you remember him mentioning at this meeting that he
 15 had received drawings from Neil Crawford?
 16 A. No.
 17 Q. Do you remember whether Mr Hoban gave you any indication
 18 that he knew what materials were going to be used in the
 19 façade?
 20 A. I don't remember the meeting, if I'm honest, it was
 21 a long time ago. I don't -- I'm not going to stand here
 22 and say yes, I remember; I don't.
 23 Q. Now, I think you referred in your statement to a visit
 24 in May 2015. If we go to {ART00004029/12}, we can
 25 an Artelia progress report, and under section 7 --

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1 actually, this looks like a Rydon progress report,
 2 in fact. But if we look under section 7:
 3 "Building Control were on site on Friday 15th May to
 4 inspect the top 3 floors for insulation, fire break and
 5 window installation on three elevation and has no
 6 adverse comments."
 7 Does this document trigger a recollection with you
 8 about whether you were the person on site seeing
 9 Building Control on that day?
 10 A. I don't think that would have been me.
 11 Q. Who would that have been, do you think?
 12 A. Probably the external manager, I don't think
 13 Danny Osgood -- yeah, Daniel Osgood was there.
 14 Q. Let's see if we can pursue that a little bit. If we
 15 look at the RBKC note of the visit, {RBK00003041/4}, and
 16 I'd like to look at the second lowest box on that page.
 17 This is again in that run of RBKC/John Hoban meeting
 18 notes, and this time we're looking at the meeting of
 19 15 May 2015. It's very short, it just says:
 20 "Inspection to check framework for cladding."
 21 Can you see?
 22 A. Yeah.
 23 Q. Can you help us with what RBKC actually inspected on
 24 that visit or can you not?
 25 A. That would have been the -- it would have been the

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1 framework, ie the rails and brackets, I would imagine.
 2 Q. Yes, but do you remember an inspection by John Hoban
 3 checking the framework for the cladding at that time?
 4 A. Not specifically, but I know that was a part of -- that
 5 he had requested seeing.
 6 Q. Do you remember whether RBKC inspected the internal
 7 works above the fourth floor?
 8 A. RBKC?
 9 Q. Well, John Hoban, Building Control.
 10 A. I don't recall if he did or not.
 11 Q. Right.
 12 A. I think they employed clerk of works for that.
 13 Q. During your interactions with John Hoban, did you ever
 14 tell him that the metal framework supporting the
 15 cladding had been tested?
 16 A. No.
 17 Q. Did you ever tell him that the cladding system had been
 18 fitted to many buildings throughout England and Wales to
 19 buildings of a similar height and construction?
 20 A. I wouldn't have known that at the time.
 21 Q. Did you ever tell John Hoban that the cladding would
 22 comply with the standards set out in Approved
 23 Document B?
 24 A. No.
 25 Q. Did you ever tell John Hoban that the cladding panels

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1 were class 0 or above?
 2 A. No.
 3 Q. Did you ever hear anybody else say something along those
 4 lines to John Hoban?
 5 A. Not that I recall, no.
 6 Q. Can I then just finally ask you one or two further
 7 questions about your liaisons with the Building Control
 8 officer.
 9 Mr Lawrence gave evidence yesterday --
 10 {Day25/181:12} and following -- about conversations with
 11 the Building Control officer -- I'm so sorry, that's you
 12 giving evidence, and you say that you walked around
 13 looking at progress, you didn't have detailed
 14 conversations with him.
 15 A. I don't have anything on my screen, just so you're
 16 aware.
 17 Q. No, that's right.
 18 SIR MARTIN MOORE-BICK: Don't worry for the moment.
 19 MR MILLETT: Now, perhaps the best and simplest way to do
 20 this is to show you Mr Crawford's statement at
 21 {SEA00014275/65}. In paragraph 206 he says:
 22 "Towards the start of my involvement in the Project,
 23 I recall meeting John Hoban (Building Control) with
 24 Simon O'Connor (Rydon) on site. This may have been
 25 during the week commencing 25 August 2014. I remember

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1 that John was very clear about how he wanted information
 2 issued, such as that he was specifically and primarily
 3 concerned with fire related matters and wanted a basic
 4 set of information so that he could then request further
 5 information if he required it, so that he was not
 6 overwhelmed with information."
 7 Now, we've got the last part of August, we've seen
 8 the Hoban note about that.
 9 Me having shown you that, does that trigger
 10 a recollection in your mind about what was discussed in
 11 that late August 2014 meeting?
 12 A. No, it doesn't, if I'm honest.
 13 Q. Is Mr Crawford's recollection incorrect when he says
 14 that he met Mr Hoban and you on site and that Mr Hoban
 15 told you both what he wanted, namely a basic set of
 16 information so that he could then request further
 17 information if he required it?
 18 A. I can't say Mr Hoban is incorrect, but I don't recall
 19 that conversation.
 20 Q. Right.
 21 Can I put to you what Mr Lawrence says about
 22 liaisons with building officers. He said at
 23 {Day25/181:19}, I just want to show you a brief exchange
 24 there. He says in answer to my question at line 19, and
 25 I've shown him an email of 3 September which I've shown

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1 you, and it says:
 2 "Question: You refer in that email, as you can see,
 3 to a meeting on site between John Hoban and
 4 Simon O'Connor.
 5 "Answer: Which presumably is the meeting that was
 6 referenced a few moments ago.
 7 "Question: Yes, I was going to ask you that.
 8 "Did Simon O'Connor himself relay to you what had
 9 been discussed at that meeting? I know Mr Crawford
 10 recalls you being present and you can't remember, but
 11 did Mr O'Connor tell you what was discussed at that
 12 meeting?
 13 "Answer: He may have done at the time but I don't
 14 recall now."
 15 Do you see that? Then I ask him:
 16 "Question: Do you know whether Mr O'Connor had said
 17 anything to Mr Hoban about whether the cladding system
 18 complied with Approved Document B?
 19 "Answer: I don't recall being told that and I can't
 20 imagine -- I think it's probably best to ask Simon, but
 21 I can't imagine that he would be -- Simon O'Connor would
 22 be stating that to Building Control."
 23 Did you state that to Building Control?
 24 A. No.
 25 Q. Do you accept that your interactions with

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1 Building Control went beyond the cursory formalities
 2 that you I think described to us this morning in your
 3 evidence?
 4 A. No, not particularly. We wouldn't be discussing
 5 Document B.
 6 Q. I want to show you something else while we're on Day 25.
 7 SIR MARTIN MOORE-BICK: How are we getting on?
 8 MR MILLETT: Very well, Mr Chairman. I have two or three
 9 more questions.
 10 SIR MARTIN MOORE-BICK: We have been running now for quite
 11 a long time. We should take our break now, and then you
 12 can put any more of your questions and anybody else's at
 13 the same time.
 14 MR MILLETT: Yes, very well.
 15 SIR MARTIN MOORE-BICK: Is ten minutes going to be enough
 16 for us?
 17 MR MILLETT: No, I think it isn't. I am detecting from my
 18 screen on the left that a little bit more time might be
 19 needed, I'm afraid, Mr Chairman. There are questions,
 20 I think, rumbling from others which I may need to ask.
 21 SIR MARTIN MOORE-BICK: Right.
 22 We will have a short break now, Mr O'Connor. We
 23 will come back at 4.30. I am sorry that this afternoon
 24 is going on longer than you had probably expected, but
 25 I'm afraid there is not much we can do about that.

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1 THE WITNESS: That's okay.
 2 SIR MARTIN MOORE-BICK: We will come back at 4.30, and see
 3 how much more there is then.
 4 THE WITNESS: Thank you.
 5 (Pause)
 6 SIR MARTIN MOORE-BICK: Right, 4.30, please. Thank you.
 7 (4.15 pm)
 8 (A short break)
 9 (4.30 pm)
 10 SIR MARTIN MOORE-BICK: Right, Mr O'Connor.
 11 THE WITNESS: Thank you.
 12 SIR MARTIN MOORE-BICK: Ready for the last lap, I hope?
 13 THE WITNESS: Yes.
 14 SIR MARTIN MOORE-BICK: Good, thank you.
 15 Yes, Mr Millett.
 16 MR MILLETT: Mr O'Connor, thank you, I have only one more
 17 set of questions for you.
 18 Can I ask you to be shown {RYD000042091}. This is
 19 an email from Simon Lawrence to you of 20 May 2015, and
 20 I think we have looked at it earlier, actually, because
 21 it was about the inspection sheet and the RS5000 product
 22 sheet; we looked at it this morning in the context of
 23 a discussion about Celotex.
 24 I want to ask you about the second paragraph. He
 25 says:

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1 "As you can read I've told him about our Quality
 2 procedures which we should be carrying out. Whilst we
 3 always do this we aren't always the greatest on site at
 4 keeping all of the records. In this case we need to be
 5 spot on in case the funders require it at the end in
 6 order to release funds. Can you also ensure the
 7 attached External Works Inspection sheet is used?
 8 Obviously you'll need to add to the checklist comments.
 9 I've only filled in a couple as an example."
 10 I just want to focus on that second paragraph with
 11 you about quality procedures, and he says, does
 12 Simon Lawrence, "we aren't always the greatest on site
 13 at keeping all of the records".
 14 Would you agree with Mr Lawrence's assessment about
 15 the keeping of records at site on this project?
 16 A. Not particularly just on this project; on projects
 17 generally within Rydon.
 18 Q. Oh, I see, so this problem about record-keeping on site
 19 was a problem endemic in Rydon, was it?
 20 A. It wasn't just at Grenfell.
 21 Q. I see. Right. Thank you. But it was on Grenfell as
 22 well as the other projects that you did?
 23 A. I thought record-keeping was quite good actually,
 24 but ...
 25 Q. So you don't agree with Mr Lawrence's assessment; is

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1 that what you're saying?
 2 A. No, I'm saying we don't always get it right, it's not
 3 always spot on, but I'm saying it's not just singling
 4 out Grenfell.
 5 MR MILLETT: Okay.
 6 Well, Mr O'Connor, I have no further questions for
 7 you for this module, and therefore I'm very grateful to
 8 you for coming along and assisting us with our
 9 investigations.
 10 So, Mr Chairman, I have nothing for Mr O'Connor left
 11 to ask him today.
 12 SIR MARTIN MOORE-BICK: Thank you very much.
 13 Well, Mr O'Connor, that was a shorter lap than I had
 14 expected, and perhaps than you had expected as well, but
 15 anyway, that's all the questions we have for you.
 16 Thank you very much for coming to give us your
 17 evidence. I'm sorry it's gone on a little longer than
 18 we had expected, but you are now finished and you're
 19 free to go. Thank you very much.
 20 THE WITNESS: Thank you for your time.
 21 SIR MARTIN MOORE-BICK: Thank you. If you would like to go
 22 with the usher.
 23 (The witness withdrew)
 24 SIR MARTIN MOORE-BICK: Good, thank you very much,
 25 Mr Millett.

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1 MR MILLETT: Mr Chairman, thank you. 231
 2 The next witness will be Mr David Hughes of Rydon,
 3 whom Ms Grange will be examining on Monday morning.
 4 SIR MARTIN MOORE-BICK: Good, thank you. We will resume
 5 then at 10 o'clock on Monday morning.
 6 MR MILLETT: Yes.
 7 SIR MARTIN MOORE-BICK: Thank you very much.
 8 (4.35 pm)
 9 (The hearing adjourned until 10 am on Monday, 27 July 2020)

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