



Grenfell Tower Inquiry

Day 138

May 27, 2021

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Thursday, 27 May 2021

1
2 (10.00 am)
3 SIR MARTIN MOORE—BICK: Good morning, everyone. Welcome to
4 today's hearing. Today we're going to hear more
5 evidence from Mr Carl Stokes.
6 So would you ask Mr Carl Stokes to come back in,
7 please.
8 MR CARL STOKES (continued)
9 SIR MARTIN MOORE—BICK: Good morning, Mr Stokes.
10 THE WITNESS: Good morning, sir. Good morning.
11 SIR MARTIN MOORE—BICK: Ready to carry on?
12 THE WITNESS: Yes, sir.
13 SIR MARTIN MOORE—BICK: Good, thank you very much.
14 Mr Millett, when you're ready.
15 Questions from COUNSEL TO THE INQUIRY (continued)
16 MR MILLETT: Thank you, Mr Chairman, good morning, and good
17 morning, members of the panel.
18 Mr Stokes, good morning to you.
19 I'd like to turn now, please, to the question of the
20 fire control switch.
21 Can we please go to your first statement,
22 {CST00003063/44}, paragraph 127 on that page, towards
23 the foot of the page, and you say there:
24 "It has been queried whether the lifts installed at
25 the Tower can rightly be described as ' firefighting

1

1 lifts ' ... "
2 And then you go on to say in the middle of the
3 paragraph:
4 "At no point was I given to understand that the
5 primary function of a ' firefighting lift ' (i.e. the
6 ability for the Fire Service to control the lift) was
7 impaired and on all occasions when attending the Tower,
8 I observed the firefighter override 'drop key' switch
9 which sat in between the 2 lifts — see further
10 paragraph 129 below. Exova's Fire Strategy Document of
11 November 2013 which also described them as firefighting
12 lifts ... "
13 Now, can we go, please, first to some handwritten
14 notes that you wrote on your October 2014 significant
15 action plan during your April 2016 FRA visit. We'll
16 find those at {CST00000002}, please.
17 Just to confirm for us, these are your handwritten
18 notes, aren't they?
19 A. Correct.
20 Q. Now, if you go, please, to page 15 in this document run
21 {CST00000002/15} and look at point 2, it says there,
22 next to the figure 2, "No FF switch". Do you see that?
23 A. Correct.
24 Q. What does "No FF switch" indicate?
25 A. Firefighter switch.

2

1 Q. Right.
2 If you look at number 1 above it, what does that
3 say? Can you read that out for us?
4 A. "No [firefighter] switch main entrance door."
5 Q. Well, it doesn't say "No".
6 A. Sorry, "[Firefighter] switch main entrance door".
7 Q. "Main entrance door", I see, and then 2, "No
8 [firefighter] switch".
9 A. Yes, internal — inner door.
10 Q. Inner doors, and then, "How do you access this door"?
11 A. Yes.
12 Q. I see. Has that anything to do with the firefighter
13 switch at the lifts ?
14 A. No, these are the override switch for access to the
15 building and the doors next to them.
16 Q. I see.
17 Nonetheless, did you realise that the fire control
18 switch installed at Grenfell Tower was not compliant
19 with BS EN 81—72 of 2003, in that it was operable with
20 a drop key rather than a triangular key as required by
21 the standards?
22 A. Because it wouldn't comply with that standard, because
23 it's not a new lift. It would have complied with the
24 old standard, which was compliant.
25 Q. Is that why you never raised that question with anybody?

3

1 A. Correct, because it's not an EN 81 lift — 82 lift.
2 Q. Can we go to your second witness statement at page 34.
3 That's {CST0003186/34}, paragraph 127. You say there:
4 "I would not have checked the actual operation of
5 a fire switch on the day of my FRA, but would have made
6 sure there were records of monthly inspections of the
7 lifts by competent lift engineers (selected by KCTMO).
8 I would have expected those inspections to have included
9 checking that whether or not the fire switch worked.
10 I also understood that this would have been checked by
11 ESAs and should have in any event have been checked by
12 the LFB during their visits ."
13 Why did you not check it for yourself?
14 A. Because, first of all , it's only visual , I wouldn't
15 check the function of the lift . I would doubt whether
16 my insurance would cover me if I damaged it or anything
17 like that.
18 Q. Well —
19 A. And it's been checked by a competent person, who is
20 a third party on contract and maintenance contract with
21 the TMO to undertake that function for them.
22 Q. I see. So I'm getting from that answer the idea that
23 you wouldn't actually try to operate any of the
24 machinery or active or passive fire safety measures in
25 the building; yours would be an entirely documentary

4

1 exercise.

2 A. Correct, visual.

3 Q. Visual?

4 A. Visual and documentary, so checking up.

5 Q. That explains why you didn't test it.

6 A. Correct.

7 Q. I see.

8 Were you aware or were you made aware of the LFB

9 having previously reported an issue with the fire

10 control switch during the fire at the Grenfell Tower

11 site, or in the tower, in fact, in April 2010?

12 A. 2010?

13 Q. Yes.

14 A. I might have been, but there's been — since then I know

15 that they had undertaken exercises there and it worked

16 all okay, and also the maintenance company would have

17 highlighted this, along with the monthly checks would

18 have highlighted if it had been — had not worked

19 correctly. Was it operator error?

20 Q. Did you actually witness somebody operating the fire

21 control switch yourself?

22 A. Yes.

23 Q. When was that?

24 A. At a meeting or a visit to the tower with some LFB and

25 they actually operated the lift and went through all the

5

1 procedures.

2 Q. Yes, when was that?

3 A. Sorry, I can't tell you the date.

4 Q. Was that part of the 2016 FRA visits or earlier than

5 that?

6 A. It was an exercise, I believe.

7 Q. Right. Can you describe what you saw on that occasion?

8 A. The LFB actually taking control of the lift.

9 Q. By using the drop key?

10 A. Yes.

11 Q. And it worked, did it?

12 A. Yes.

13 Q. I want just to ask you then about maintenance, because

14 you refer to records.

15 Can we please go to your letter of

16 27 September 2010, {CST00003061/4}, please.

17 On page 4, you see there there's a list of items

18 that were discussed, and at item 6 it says:

19 "6. Annual comprehensive servicing and maintenance

20 contract is in place for all lifts. This includes

21 monthly inspections.

22 "7. TMO employs a dedicated Lift Engineer who is

23 responsible for the supervision and monitoring of the

24 contract/contractors.

25 "8. The Council's Insurers ... carry out 6-monthly

6

1 inspections which include a full safety check.

2 "9. Estate staff (caretakers, porters, inspectors)

3 and Neighbourhood Officers carry out regular estate

4 inspections which include visual inspection of the lift

5 car and testing of the lift alarm."

6 Now, after your meeting with Janice Wray on

7 24 September 2010, which is the time when this letter

8 was written, did you ever receive any updated

9 information about the maintenance of the lifts?

10 A. I believe the lift maintenance company changed, I'm

11 going to go from Apex to another company in the time —

12 in the seven-year period.

13 Q. Right. Do you remember when that was, roughly?

14 A. No, sorry. But I understood that the contract and

15 maintenance and everything was the same.

16 Q. Robin Cahalan retired in 2012; did you receive any

17 updated information about the maintenance of the lifts

18 at that stage?

19 A. I knew that the lift engineers were — the department

20 that they worked for and all the lift engineers were

21 going, but everything was staying in place, so there

22 were still monthly inspections, the caretakers were

23 still undertaking call button testing of the lifts as

24 part of their routine, and the insurance and maintenance

25 contracts were still all in place.

7

1 Q. What I've read to you, items 6 to 9 on that page, are

2 part of a run of details about the lifts which we looked

3 at yesterday.

4 Is it the case that what you recorded here in these

5 paragraph numbers in this 27 September 2010 letter

6 always remained your understanding of the maintenance

7 and testing regime across the whole of the TMO stock?

8 A. Correct, apart — the only one is that the lift engineer

9 department was actually not in being anymore. So there

10 was no dedicated lift engineer as such.

11 Q. When the lift engineer department ceased to be, did you

12 get any updated information about what was going to

13 happen next with regard to the maintenance programme?

14 A. It was undertaken by repairs and maintenance, it was

15 being overseen by them.

16 Q. Did you get any information yourself about what they

17 were going to be doing?

18 A. Staying the same as far as — that would be the

19 information, everything stayed the same.

20 Q. Yes. What I'm really trying to get at is do you

21 remember receiving any new information about how the

22 maintenance programme was going to be conducted from

23 that point on?

24 A. No, because the maintenance programme would have been —

25 would have stayed the same.

8

1 Q. Now, in section 23 of all of your FRAs, you included —
 2 and I'll show you one example — some text about the
 3 maintenance of the lifts, don't you?
 4 A. Yes.
 5 Q. Yes. Let's use the April 2016 FRA as an example,
 6 {CST00003161/31}, please.
 7 If we look at the fourth question down, you can see
 8 that there's the standard question:
 9 "Monthly inspections of switches and annual testing
 10 of the fire fighting/evacuation lifts, with records
 11 kept?"
 12 And on this occasion you have ticked it "Yes".
 13 A. Correct.
 14 Q. Now, if you look at PAS 79:2012 at {CTA00000003/94},
 15 please, you can see the template here, which of course
 16 is informative and not normative, as we know. But it
 17 says here that the responsible person should be carrying
 18 out weekly and monthly testing, if you look at 27.7:
 19 "Weekly and monthly testing, six—monthly inspection
 20 and annual testing of fire—fighting lifts?"
 21 Do you see that?
 22 A. Yes.
 23 Q. I'm just focusing on weekly or monthly testing and
 24 six—monthly inspection.
 25 Why did you amend the question in your FRA pro forma

9

1 so as to exclude weekly testing?
 2 A. My understanding is it is regular testing in the
 3 British Standard. Documentation, "regular" is no
 4 timescale. Monthly testing by a specific professional
 5 third—party maintenance company, in my view, was
 6 acceptable, and from my understanding that is what is
 7 now being proposed by the review of all documentation,
 8 is monthly testing. It is a regular testing, it is
 9 documented, and I checked the lift record book in the
 10 lift motor room every time when I went to undertake
 11 an assessment.
 12 Q. In light of that answer, perhaps we can just have back
 13 up on the screen at the same time as this document
 14 section 23 of your April 2016 FRA we've just been
 15 looking at at {CST00003161/31}. That's now on the
 16 left—hand side of your screen, Mr Stokes, and on the
 17 right—hand side we want PAS 79, {CTA00000003/94}, at the
 18 foot. Thank you, that's there.
 19 Now, if you compare the two, you've got monthly
 20 inspections and annual testing; PAS 79 has weekly and
 21 monthly testing, six—monthly inspection, and annual
 22 testing. Why is yours different?
 23 A. Mine's — the six—monthly testing is the insurance
 24 inspection, in my understanding. As long as the annual
 25 testing is there along with the monthly, that would, as

10

1 far as I would be aware, satisfy the requirements of the
 2 documentation for lift testing.
 3 Q. What about weekly testing? Why didn't you have weekly
 4 testing?
 5 A. Well, weekly testing was undertaken of the call point
 6 within the lift by the caretakers.
 7 Q. Well, what's required is weekly testing of firefighting
 8 lifts. It doesn't confine itself just to the call
 9 point, does it?
 10 A. Well, weekly testing is — testing of the lift is
 11 ongoing. This is a guidance document which says weekly,
 12 monthly testing, six—monthly inspections and annual
 13 testing of a firefighting lift. They were all being
 14 undertaken in different ways, shapes and forms by the
 15 maintenance contract in place.
 16 Q. Let's take a step back.
 17 We're looking at the 2016 FRA. Now, we know that
 18 this question that you're asking in your FRA was the
 19 same from 2010.
 20 A. Yes.
 21 Q. It appears in 2010, 2012 and 2014 and the two FRAs in
 22 2016. We know that PAS 79 was published in August 2012.
 23 Between August 2012 and November 2012, when you did
 24 your November 2012 FRA, did you have any training or do
 25 any CPD on the new PAS 79?

11

1 A. I can't remember, that's a long time ago.
 2 Q. Did you do any training or CPD on PAS 79 before
 3 October 2014?
 4 A. I would have done, yes.
 5 Q. Right. At that stage, would you have realised that the
 6 template, if you'd studied it closely, was requiring, or
 7 recommending — that is a better word — weekly and
 8 monthly testing, six—monthly inspection and annual
 9 testing of firefighting lifts?
 10 A. That is the guidance in that document. I — from my
 11 document there, I am — my view is that I was complying
 12 with what was the requirements. There was weekly
 13 testing, which was carried out by the caretakers,
 14 monthly testing by a third party, and six—monthly
 15 insurance followed by annual inspections by
 16 a third—party lift maintenance company was all being
 17 undertaken.
 18 MR MILLETT: That's not quite an answer to my question. I'm
 19 going to press you a little bit. What I'm really —
 20 SIR MARTIN MOORE—BICK: Perhaps I can help, Mr Stokes.
 21 I think what counsel is inviting you to deal with is
 22 this: the PAS pro forma at 27.7 refers to weekly
 23 testing.
 24 A. Yes.
 25 SIR MARTIN MOORE—BICK: Your document, halfway down the page

12

1 on the left that we're looking at, doesn't refer to
 2 weekly testing.
 3 A. It doesn't.
 4 SIR MARTIN MOORE—BICK: Is there a reason for that?
 5 A. No. It is there — weekly testing was undertaken by —
 6 SIR MARTIN MOORE—BICK: It may have been done; the question
 7 is: why is it not referred to in that part of your
 8 document?
 9 A. I've no idea, sir.
 10 SIR MARTIN MOORE—BICK: Right.
 11 I think that was your point, wasn't it, Mr Millett?
 12 MR MILLETT: It was an aspect of my point, certainly.
 13 Let me try and get to the other aspect of it, which
 14 is this: did you ever sit down with your pro forma,
 15 which you see on the left—hand screen, and compare it
 16 with the pro forma on the right—hand side of your screen
 17 and make a conscious decision not to change your
 18 question about inspections and testing of lifts so as to
 19 conform with paragraph 27.7 at the foot of the page in
 20 the PAS pro forma?
 21 A. I would have done, and it's the same if you look at
 22 27.4, where it says "Annual maintenance of fire
 23 extinguishing appliances". On mine it says monthly and
 24 annual.
 25 Q. You see, yours is traceable back to a time before

13

1 PAS 79:2012, and what I'm really asking you is this: did
 2 you ever sit down and consciously address whether the
 3 pro forma questions within at least this part of your
 4 FRA conformed to the new pro forma, forming appendix B
 5 to PAS 79 of August 2012?
 6 A. Yes, I would have done.
 7 Q. You would have done; do you remember actually doing that
 8 exercise?
 9 A. Yes.
 10 Q. When was that?
 11 A. I can't tell you, but I would have done, because my —
 12 I would have worked to this, as you can see, as I said
 13 there, I've got different — for the fire extinguishers,
 14 monthly included in mine as well as annual.
 15 Q. So we can take it, can we, that you made a conscious
 16 decision not to change your pro forma so as to bring it
 17 in line with 27.7?
 18 A. Which is guidance.
 19 Q. Sorry, please answer my question.
 20 A. Yes.
 21 Q. You made a conscious decision; yes?
 22 A. Yes.
 23 Q. Yes, and the reason, in brief, for that conscious
 24 decision not to update your pro forma to bring it in
 25 line with the PAS pro forma was what?

14

1 A. My understanding is that this was the requirements as
 2 would be required and they met the criteria of
 3 inspections of a lift.
 4 Q. If we look at the LGA guide, which is a further piece of
 5 guidance, {HOM00045964/125}, please.
 6 A. Can I ask a — make an observation, please?
 7 Q. Yes, of course.
 8 A. Weekly testing of a firefighting lift is also undertaken
 9 because the lift is interfaced with the fire alarm
 10 system within a building, and the lift grounds on the
 11 activation of the fire alarm system. So weekly testing
 12 of the lift can be undertaken at the same time as the
 13 fire alarm system is tested weekly. But in the case of
 14 the tower, there is no communal fire alarm system, so
 15 therefore weekly testing, because there's no interface,
 16 would not occur.
 17 Q. I see.
 18 If we look at the LGA guidance that I'm about to
 19 show you at page 125 —
 20 A. Sorry, can I just make another observation, please, as
 21 I'm thinking this through in my mind.
 22 PAS 79 there and that guidance is not just specific
 23 to residential buildings. PAS 79 is all buildings with
 24 all firefighting lifts. In that case, they would have
 25 a lift interfaced with a fire alarm system. As there's

15

1 no fire alarm system, I've made my document
 2 site-specific for the tower, so therefore it is more
 3 relevant to the tower and the systems in place in the
 4 tower, rather than a generic document of PAS 79 that
 5 covers all buildings, residential and commercial.
 6 Q. Yes. You say that you've made your document
 7 site-specific for the tower; in fact, I think the
 8 question in that part of your FRA we've looked at was
 9 the same for other residential towers in the TMO stock,
 10 wasn't it?
 11 A. Yes, because they're residential. No communal
 12 fire alarm systems fitted.
 13 Q. So it's not tailor-made for the tower, but tailor-made
 14 for the TMO stock's towers?
 15 A. Or for buildings with no fire alarm systems fitted.
 16 Q. Can we go to what I want to look at, which is
 17 paragraph 81.26 under "Fire-fighting lifts".
 18 I should tell you, this is the LGA guide published
 19 in 2011:
 20 It says this:
 21 "Lifts used for fire-fighting need to be subject to
 22 tests and maintenance on a regular basis. This will
 23 involve weekly operation of override switches and
 24 monthly inspections and annual testing and maintenance
 25 of the lifts."

16

1 Were you aware of that principle after 2011?
 2 A. Correct, yes.
 3 Q. You were.
 4 Do you agree with Mr Howkins' conclusion — and, for
 5 the record, it's paragraph 462 of his report at
 6 {RHO00000003/181} — that best practice would have
 7 required testing of the operation of the fire control
 8 switch on a weekly basis by an individual on site?
 9 A. Best practice, yes.
 10 Q. Yes. Do you agree with him?
 11 A. Yes.
 12 Q. Why did you choose not to follow the British Standard
 13 and the LGA guide and check if there was a weekly
 14 testing of the override fire control switch?
 15 A. Because, in my view, monthly testing by a competent
 16 person is lot better than having an employee test it on
 17 an ad hoc basis.
 18 Q. Well, it wouldn't be ad hoc, it would be weekly.
 19 A. Well, on a weekly basis.
 20 Q. But the problem with that theory is, isn't it, that
 21 a month is four times longer than a week, and that
 22 an awful lot can go wrong during a month rather than
 23 a period of seven days?
 24 A. But when you test it, you're only testing it for that
 25 moment in time. It could go wrong ten minutes later.

17

1 Q. Well, that's an argument, but do you accept that by
 2 leaving it four times longer, there is a greater risk
 3 that something will have gone wrong in the meantime?
 4 A. I do accept that, but also that regular testing is
 5 regular testing. I believe the government guidance that
 6 is coming out is going to suggest monthly testing now.
 7 Q. Well, can we steer away from what is happening now and
 8 everything that's going into that, please, Mr Stokes,
 9 I'm quite interested in what's happened in the past.
 10 I think you accept, don't you, that you were not in
 11 compliance with best practice, according to Mr Howkins'
 12 opinion?
 13 A. In his opinion.
 14 Q. Now, can we go, please, to your second witness
 15 statement, {CST00030186/34}. We have touched on this,
 16 so I will take it quite quickly.
 17 Paragraph 127 I've shown you, and I've read that to
 18 you now.
 19 As to what you say in paragraph 127 there at the
 20 foot of your screen, let me show you what Dr Lane says.
 21 Can we go, please, to {BLARP20000027/256}. This is
 22 paragraph 12.2.34 where she says:
 23 "They needed to satisfy themselves ..."
 24 That's the LFB — well, actually, it could be the
 25 LFB; it could also be you and Ms Wray, if you look at

18

1 the previous paragraph:
 2 " ... they could rely on the lift to operate as it
 3 was required to do, and so not pose a risk to the
 4 relevant persons."
 5 Do you agree with that?
 6 A. Yes.
 7 Q. You do.
 8 Now, in your 2016 significant findings schedule, can
 9 we go to that, {CST00003098/6}, paragraph 19(g), you can
 10 see towards the top of the screen or middle of the
 11 screen really, you've got a red item there:
 12 "It is not known if the fire service controls for
 13 the lifts been moved back down to the street level?"
 14 Then under "Actions to be taken" you've put:
 15 "Can it be confirmed that the fire service controls
 16 for the lifts have been moved back down to the street
 17 level?"
 18 "If not then this must be undertaken immediately."
 19 Was that not an opportune moment for you to check
 20 the operation of the override switch, especially given
 21 your concern about whether it had been moved as part of
 22 the refurbishment?
 23 A. But as a risk assessor, I wouldn't undertake actual
 24 practical, physical operation of a system.
 25 Q. And you say in your statement that you would have

19

1 expected those inspections to have included checking
 2 whether the fire switch worked, but you didn't
 3 specifically check that with the TMO yourself?
 4 A. As in physically asked the question. I had the
 5 information from the log book in the lift motor room to
 6 say that monthly inspections were undertaken.
 7 I physically did not check the lift and I don't think it
 8 would be a risk assessor's job to actually take —
 9 undertake that operation.
 10 Q. Did you ask the TMO specifically the question: have the
 11 ESAs checked or have the lift engineers checked?
 12 A. Yes, by that question.
 13 Q. Well, in your statement, you say "I would have expected
 14 those inspections to have included checking", et cetera;
 15 did you ever ask the TMO that question?
 16 A. The monthly inspections were undertaken by a company
 17 whose sole purpose was to check the lifts, including the
 18 operation of the firefighter switches, on a monthly
 19 basis, and I had evidence of that from the lift motor
 20 room log book that it had been undertaken.
 21 My question in that significant finding was: has the
 22 override switch, which is now not in use at that floor
 23 level, been taken back down or disconnected and taken
 24 back down to the street level, which would now be the
 25 operational fire service entry point?

20

1 MR MILLETT: Now, you —
 2 SIR MARTIN MOORE—BICK: Sorry, can I just understand
 3 something.
 4 A. Sorry, sir.
 5 SIR MARTIN MOORE—BICK: Sorry, Mr Millett.
 6 MR MILLETT: No.
 7 SIR MARTIN MOORE—BICK: Your FRA notes that it is not known
 8 if the fire service controls have been moved. Why was
 9 that unknown?
 10 A. So, where we're looking at here, this item, while the
 11 tower was under refurbishment — sorry, I'm going to use
 12 my hands. Ground floor was the entry point.
 13 SIR MARTIN MOORE—BICK: Yes.
 14 A. But under the refurbishment, there was a walkway level
 15 four floors up that came in from Grenfell Walk. That's
 16 what I'm talking about here. So there was two sets of
 17 controls at that point. So the people entered the
 18 building at this 4th floor level. That bridge had now
 19 been taken away, so these controls were now redundant.
 20 SIR MARTIN MOORE—BICK: Well, presumably you could see
 21 whether there was a switch box at that previous entry
 22 level.
 23 A. There was, it was still on the wall.
 24 SIR MARTIN MOORE—BICK: And you could see whether there was
 25 a switch box at street level.

21

1 A. There was.
 2 SIR MARTIN MOORE—BICK: So is your question really you don't
 3 know which is operative?
 4 A. No, my question is: it is not known if the fire service
 5 controls for the lifts had been moved back down to the
 6 street level only.
 7 SIR MARTIN MOORE—BICK: Well, isn't that the same thing?
 8 A. Well, at that time I believed that there was two lots of
 9 switches in use.
 10 SIR MARTIN MOORE—BICK: All right.
 11 MR MILLETT: What gave you to believe that?
 12 A. Because that was the — the walkway was the entry point
 13 to the building for the residents.
 14 Q. Did you think both were working?
 15 A. I don't know, that's why I've asked the question,
 16 "Please can you confirm that the fire service controls
 17 have been moved back down to street level?"
 18 Q. Sticking with paragraph 127 of your second statement,
 19 which we have on the screen {CST00030186/34}, just
 20 focusing on the last sentence there which says:
 21 "I also understood that this would have been checked
 22 [that's the fire switch] by ESAs and should have in any
 23 event have been checked by the LFB during their visits."
 24 In light of that, can we just look at your FRAs,
 25 where you detail maintenance of the lifts in section 5.

22

1 Can we go, again by way of example, to the 2014 FRA
 2 at {CST00003157/14}.
 3 If you go to the foot of the page in the box, you
 4 see that it says, four lines down:
 5 "There is a planned maintenance programme of
 6 inspections for the lift machinery/plant within the
 7 building which is carried out by a third party
 8 contractor (Express Lifts Limited). The records kept
 9 centrally in the 'Hub' in Kensal Road but there is
 10 a record book kept in the lift motor room to aid the
 11 service engineers, the last service dates in the lift
 12 record books is the 12th September 2014. Both lifts
 13 installed in this building are fire fighting/evacuation
 14 lifts according to the TMO's documentation, these
 15 fighting/evacuation lifts have their own independent
 16 dedicated power supply and fire fighters control
 17 switch."
 18 Would you agree that in that text you don't say that
 19 you believe the ESAs or the LFB are undertaking
 20 inspections?
 21 A. Correct, because it's not in that part of the document.
 22 Q. And there is no — we don't have to go to them, but we
 23 can if you like — subsequent action that you set out in
 24 your significant findings schedule that that should be
 25 checked and that inspections should be implemented.

23

1 A. Because if you go back to the previous page, sir, it
 2 actually says monthly inspections are being undertaken.
 3 Q. Let's go back to the previous page.
 4 A. Records, 12 September 2014.
 5 Q. "There is a planned maintenance programme of inspections
 6 for lift machinery ..."
 7 Yes, would you help me just find out where it says
 8 that there is a monthly inspection or any inspection by
 9 the LFB or the ESA?
 10 A. There is no inspection by the LFB because they wouldn't
 11 test the lift on a monthly basis. The monthly
 12 inspection is there recorded, 12 September 2014.
 13 Q. Yes. That's service dates.
 14 Do you accept that you don't mention there anywhere
 15 in this FRA that you believe that the ESAs or the LFB
 16 are undertaking or should be undertaking those
 17 inspections?
 18 A. Because this is an FRA. They wouldn't undertake —
 19 sorry, the LFB would not undertake inspections of
 20 a lift. If they undertook a 7.2(d) visit to the
 21 building, they would check the lift.
 22 Q. Well, you see, I'm puzzled by this, because you say in
 23 your statement that the switch should have been checked
 24 or would have been checked by the ESAs, the caretakers,
 25 and in any event by the LFB during their visits. All

24

1 I'm putting to you is that there is no hint of that from
 2 your FRA.
 3 A. Because —
 4 Q. Do you accept what I'm putting to you?
 5 A. I accept what you're putting to me, but the LFB —
 6 during the LFB visits. So if the LFB visited and
 7 undertook a 7.2(d), I would expect them to check the
 8 lift.
 9 Q. You —
 10 A. This is not about LFB visits here. I'm just making
 11 a statement that if the LFB visited the building to do
 12 a 7.2(d), I would expect them to check the lifts.
 13 Q. If you believed that the ESAs, the caretakers, were
 14 required to inspect the firefighters' switch, that was
 15 something you could have checked with Paul Steadman, for
 16 the purposes of Grenfell Tower anyway?
 17 A. If I — they would — the ESAs were checking the call
 18 points, the manual button inside the lift for voice, and
 19 it was undertaken on a monthly basis by the company that
 20 was employed by the TMO to undertake monthly inspections
 21 of the lift, which included testing the drop switches.
 22 Q. If you just go back to paragraph 127 of your second
 23 statement {CST00030186/34}, in the last three lines of
 24 the paragraph I read to you, you say:
 25 "I would have expected those inspections to have

25

1 included checking that whether or not the fire switch
 2 worked. I also understood that this would have been
 3 checked by ESAs ..."
 4 Did you ever ask Paul Steadman whether he had
 5 checked the fire switch?
 6 A. The drop switch.
 7 Q. Well, you referred to fire switch there.
 8 A. Fire switch, which is the ...
 9 (Pause)
 10 So I would — so the monthly inspections — during
 11 those monthly inspections, I would have expected those
 12 inspections to have included checking whether the fire
 13 switch worked or not, so that's the monthly inspections.
 14 "I also understood that this would have been checked
 15 by ESAs and should have in any event been checked by the
 16 LFB during their visits."
 17 So, yes.
 18 Q. My question: did you ever ask Paul Steadman, who was the
 19 ESA for Grenfell Tower, whether he had checked what you
 20 say you understood he would have checked?
 21 A. On the lifts? No.
 22 Q. Why not?
 23 A. Because it's not for me to challenge — if I ever saw
 24 him on site, it was not for me to check he's actually
 25 doing his job.

26

1 Q. This belief that you refer to, "I would have expected",
 2 is that hindsight, really, or was this something that
 3 you always assumed at the time without ever actually
 4 checking for yourself?
 5 A. I understood that that was what was being undertaken,
 6 yes.
 7 Q. But you didn't think to ask Paul Steadman about it?
 8 A. No.
 9 Q. You see, he says in his statement — and I'll just read
 10 it into the record, it's {TMO00870944/2}, paragraph 6 —
 11 that he would not check the firefighter switch.
 12 A. So the drop switch.
 13 Q. Well, he says the firefighter switch, and you're using
 14 the word fire switch.
 15 A. The fire switch is the drop switch.
 16 Q. Yes.
 17 A. And he is saying which switch?
 18 Q. The firefighters' switch?
 19 A. Is there some confusion here between the call button
 20 inside the lift and the actual drop switch on the
 21 outside, which is for firefighter use only?
 22 Q. Let's have a look and see exactly what he says in case
 23 it's my confusion. {TMO00870944/2}, paragraph 6.
 24 (Pause)
 25 Thank you very much.

27

1 Paragraph 6:
 2 "I wish to clarify that in my earlier statement
 3 where I said that I would check the LFB drop key was
 4 working I was not referring to the drop key that would
 5 be used by the LFB to take control of the lift. I would
 6 not touch that LFB drop key for the lift and I suspect
 7 this was checked by the LFB during their regular visits.
 8 What I was referring to was the LFB drop key for the
 9 main door to the Tower, which is a different type of key
 10 to the key used on the lifts. This drop key, which
 11 I had a copy of, would work on most door entry systems
 12 and permit the LFB to gain access to a building without
 13 a fob. It is very easy to use."
 14 That's what he says. He says he would not check the
 15 LFB drop key was working. So he —
 16 A. My understanding was that —
 17 Q. So you tell me, it's right, isn't it, I think, that he
 18 is saying that he would not check the switch that brings
 19 the lifts under the control of the fire service?
 20 A. But reading this, he's confused on which one he's
 21 talking about as well.
 22 Q. I don't want you to comment, I'm just showing you his
 23 evidence.
 24 My question is: did you ever ask Mr Steadman —
 25 A. No.

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1 Q. No.
 2 A. It was my understanding.
 3 Q. Right.
 4 Now, can we then look at Mr Todd's opinion at
 5 {CTA00000011/90}.
 6 Go, please, to paragraph 8.86 on that page. This is
 7 what Mr Todd says. He says:
 8 "In that second witness statement, Mr Stokes also
 9 states that, in relation to the firefighters' switch, he
 10 'understood that this would have been checked by ESAs
 11 and should have in any event have (sic) been checked by
 12 the LFB during their visits.' I have been presented with
 13 no evidence that would form a basis for Mr Stokes'
 14 understanding in relation to the ESAs. The ESAs were
 15 required to check that lifts operated correctly, but
 16 this would not imply to me that they were required to
 17 confirm the correct operation of the firefighters'
 18 switches; it is a matter for evidence of fact as to
 19 whether they were trained to do so or were even in
 20 possession of the drop keys required to operate the
 21 switches ... Moreover, at the time of Mr Stokes' most
 22 recent FRAs, LFB had long since ceased to test
 23 firefighters' switches on a routine basis, nor was it,
 24 in my opinion, incumbent on them to do so."
 25 Now, just focusing on the last part of that

29

1 paragraph, do you agree with what Mr Todd says there in
 2 the last sentence?
 3 A. That it wasn't the — the LFB had ceased to test
 4 firefighter switches, is that the —
 5 Q. That's the last sentence, yes.
 6 A. I would not be privy to them, the LFB, changing their
 7 operational procedures, but my understanding of when
 8 I undertook 7.2(d) visits, it was part of the
 9 requirement that you tested the drop switch.
 10 Q. But as an experienced fire risk assessor, why wouldn't
 11 you be privy to, and if not privy to at least have
 12 an understanding of, LFB practices?
 13 A. I wouldn't have access to their operational procedures
 14 or practices.
 15 Q. And if you had continued to believe that the LFB would
 16 carry out these tests or inspections on firefighter
 17 switches and that practice had changed, then you ought
 18 to have known that that practice had changed so that you
 19 could no longer reasonably rely on it?
 20 A. Well, LFB should have been following guidance in
 21 GRA 3.2, and if they changed it internally, they're not
 22 going to advertise it to a fire risk assessor. I would
 23 expect them to follow national guidance on 7.2(d) checks
 24 and visits.
 25 Q. Do you accept that if it was the case that LFB had long

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1 since ceased to test firefighter switches on a routine
 2 basis and it was not incumbent upon them to do so, then
 3 you could not reasonably have relied on the LFB checking
 4 the switches as you've said in your statement?
 5 A. I was not privy to the LFB's internal information,
 6 I could only go with the information that I had at the
 7 time, which is, under 7.2(d), it would be reasonable for
 8 them to check that the actual system worked.
 9 Q. Flat entrance doors. I want to start with the door
 10 replacement programme.
 11 Now, if we go to your second witness statement,
 12 please, at {CST00030186/15}, you say at paragraph 57
 13 there:
 14 "In relation to the door replacement programme
 15 undertaken by the KCTMO, CS Stokes had no specific role
 16 other than providing advice on the requirements for fire
 17 doors set out in relevant guidance. This advice was
 18 provided in the abstract. I did not advise on the
 19 acquiring of a procurement company, the procurement
 20 process, the selection of Manse Masterdor or any tender
 21 bids submitted."
 22 The advice that you provided was in addition to your
 23 work as a fire risk assessor, wasn't it?
 24 A. Correct.
 25 Q. And it was therefore, is this right, ad hoc advice as

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1 provided for in your contract?
 2 A. Yes.
 3 Q. Yes, and you provided that advice, I think, to
 4 Abigail Acosta of the TMO?
 5 A. The request came via Janice Wray.
 6 Q. Indeed, and I was going to ask you: you also provided
 7 that advice to Janice Wray?
 8 A. I would have gone that route anyway. My point of
 9 contact was Janice Wray.
 10 Q. Indeed. I think it's right, as you say in your
 11 statement in the next paragraph, that it was Janice Wray
 12 who provided instructions to you to provide that advice.
 13 A. Correct.
 14 Q. If we go back to paragraph 57 of this statement, you
 15 say, "This advice was provided in the abstract", in the
 16 middle of that paragraph, as I've read to you.
 17 What did you mean by "in the abstract"?
 18 A. "Can you provide us some information on the standards
 19 required of fire doors for flats."
 20 Q. I see.
 21 As far as you were aware, was anybody else providing
 22 advice to the TMO about the requirements for fire doors?
 23 A. I would have no privy or knowledge of that information.
 24 I was just — I undertook what the job was from
 25 Janice Wray.

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1 Q. At paragraph 58 of your statement, you say:
 2 "Along with my letter of 24 June 2011 [and you
 3 exhibit it] ... I did author the document titled
 4 'Criteria for prioritising the fitting of new entrance
 5 doors to flats' ... at the request of Ms Wray. Again
 6 this was provided to assist the KCTMO navigate its way
 7 through the door replacement process ... I am not aware
 8 of how this document was used, and if I was ever aware,
 9 I cannot now recall. Other than those documents
 10 referred to above, I do not recall providing further
 11 specific advice on new entrance doors, but will have
 12 discussed the contents of those letters with Ms Wray."
 13 To what extent was Janice Wray involved in the door
 14 replacement programme from what you could see?
 15 A. Facilitator, as far as I was aware.
 16 Q. Meaning what?
 17 A. That she contacted me and asked for information.
 18 Q. Right.
 19 Do you know whether she had any input, any
 20 decision-making functions, from what you could tell,
 21 into the type of door chosen.
 22 A. No, I wouldn't have any knowledge of that at all.
 23 If ...
 24 Q. Right.
 25 Now, if we go to your first statement, please, at

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1 {CST00003063/29}, at the foot of that page, let's look
 2 together at paragraph 88.
 3 You say there, under the heading "Replacement
 4 Doors":
 5 "In 2012, the KCTMO undertook a wide ranging
 6 flat-door replacement scheme across its buildings ('2012
 7 Replacement'). This included the Tower. The doors were
 8 replaced by Manse Masterdor and I was provided with
 9 product literature from Manse Masterdor which purported
 10 that the doors they would be [supplying] were 30-minute
 11 fire rated fire doors ('FD30') ..."
 12 Then you go on, having exhibited some documents, to
 13 say this:
 14 "There was some initial concern at the time about
 15 the requirements necessary for fire doors [and you
 16 exhibit some further documents] ... A FD30 rating was
 17 however sufficient to maintain compartmentation in
 18 accordance with the Building Regulations, and when asked
 19 about this, that is what I confirmed ... As can be seen,
 20 I was only able to comment on the information available
 21 to me."
 22 Now, I'd like to look back at the advice that you
 23 gave at the time about the requirements for flat
 24 entrance doors.
 25 Can we start, please, with {CST00002660}. This is

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1 a letter that you sent to Janice Wray on
 2 10 November 2010, and it's entitled:
 3 "Subject: The replacement of fire doors to some
 4 entrance doors of residential flats."
 5 Underneath that it says:
 6 "Criteria for prioritising the fitting of new
 7 entrance doors to flats."
 8 First, why, do you remember, had Janice Wray asked
 9 for that advice at that time?
 10 A. My belief was that -- "Where would the priorities lie,
 11 if we have X amount of money to provide X amount of
 12 doors, where would you suggest we start?"
 13 Q. Did you have a discussion with her which led to this
 14 letter being written?
 15 A. I would have done.
 16 Q. Right. Can you remember anything about it?
 17 A. Backwards and forwards discussion, "What do you think
 18 about this, how does this go?"
 19 Q. Right. Was that on the telephone or by email?
 20 A. I would have thought it was by telephone.
 21 Q. Right.
 22 Now, if we look at the number of criteria, you can
 23 see there are eight.
 24 A. Yes.
 25 Q. And that is the priority list.

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1 Underneath that, you say this:
 2 "Once the locations of the entrance doors or
 3 corridor sub division doors in buildings has been
 4 decided upon the following options could be
 5 implemented."
 6 Then you see "Options" at the foot of the page, and
 7 then there are three options. The first is this one:
 8 "1. Replace the old door and frame (the door set)
 9 with a new 30 minute fire rated door set incorporating
 10 intumescent strips and sold smoke seals (FD30s) with
 11 a self closing device."
 12 Over the page, page 2 {CST00002660/2}, option 2:
 13 "2. Replace the old door with a new 30 minute fire
 14 rated door inserted into the old frame incorporating
 15 intumescent strips and cold smoke seals in the new door
 16 (FD30s) with a self closing device.
 17 "3. Fit intumescent strips (if not fitted) and cold
 18 smoke seals in the existing door and a self closing
 19 device to the door."
 20 In this letter it's clear that you advised
 21 Janice Wray that what was required for a replacement
 22 door in all of these options, and certainly the first
 23 two, was an FD30S door.
 24 A. Correct.
 25 Q. When you had sent this letter to Janice Wray, do you

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1 remember any follow-up discussion with her about it?
 2 A. There would have been probably a follow-up discussion.
 3 I can't remember any details.
 4 Q. Right.
 5 Did you explain to her at any stage that there was
 6 a need for doors to be tested for smoke leakage as
 7 a separate test to the test for fire resistance?
 8 A. That's part of the testing undertaken on a door anyway.
 9 Q. To make it an FD30S?
 10 A. On a new door, yes.
 11 Q. Yes.
 12 Do you agree that doors were required to be FD30S
 13 and not FD30 in order to be compliant with Approved
 14 Document B?
 15 A. Depending on location of door.
 16 Q. Depending on location of door. Can you just enlighten
 17 us further about what that means?
 18 A. So you would only have to have an S, the smoke seal,
 19 which is the denote — marking that it has a cold smoke
 20 seal on it if the door is off an internal or protected
 21 route or corridor. If it's on an external balcony or
 22 it's an external door, it does not have to have the S.
 23 Q. So if it leads to the outside, it doesn't need to have
 24 an S?
 25 A. Correct.

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1 Q. I see.
 2 If you go next, please, to {CST00013074}.
 3 This is another letter that you sent Janice Wray,
 4 this time on 7 March 2011, and it's an update, or rather
 5 it has been updated, after meeting with Simon Throp on
 6 Thursday, 10 March 2011. The subject is:
 7 "The replacement of entrance doors to some
 8 residential apartments."
 9 Do you remember why you met Simon Throp and
 10 Janice Wray about the replacement doors?
 11 A. Only to probably go over the door. It would have been
 12 a meeting requested by Janice.
 13 Q. Let's see if we can help a bit better.
 14 Can we go to {CST00013074/2}, please.
 15 At the foot of the page, we've got the note of the
 16 meeting there. Underneath your name it says:
 17 "Up dated[sic] information after 10th March meeting
 18 with J Wray and S Throp."
 19 And underneath that it says:
 20 "Simon confirmed that the replacement doors would
 21 have self closers and cold smoke seals fitted to them,
 22 also the letter boxes would be fire rated. It was also
 23 agreed that I would be present when the first doors are
 24 installed and Abigail Acosta, the project manager will
 25 arrange the dates and times etc."

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1 Do you remember why you met Simon Throp and
 2 Janice Wray?
 3 A. I would have thought to go over that and look at the
 4 criteria of the doors.
 5 Q. Right.
 6 Now, let's go back to the letter itself on page 1
 7 {CST00013074/1}.
 8 If you scroll down on your screen, please, we get to
 9 the third paragraph down, and it says this:
 10 "On the Manse Masterdor Ltd company web site it
 11 states that their doors 'meet the requirements of Part M
 12 of the building regulations, and fire-check versions
 13 have also been successfully tested to BS476 Part 22'.
 14 "1. Can it please be confirmed that the doors that
 15 are to be fitted under the contract are the 30 minute
 16 Fire Doors (FD30) version and could the company forward
 17 all the relevant documentation to confirm this."
 18 Was that advice there not inconsistent with the
 19 advice that the doors needed to be FD30S that we had
 20 seen in your letter to Janice Wray of 10 November 2010?
 21 A. No.
 22 Q. Why is that?
 23 A. Because this — sorry.
 24 (Pause)
 25 So we're talking of the door there is 30. The S is

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1 the smoke seals, and they were in the frames of the
 2 doors. From my memory, they're in the frames of the
 3 doors.
 4 Q. I'm sorry, I'm not really following you. In your letter
 5 of 10 November —
 6 A. Yes.
 7 Q. — your advice under two of the three options was that
 8 the doors needed to be FD30S.
 9 A. Correct.
 10 Q. Now you're saying they needed to be FD30. Could you
 11 explain why the advice is different?
 12 A. So the S is the same — is an addition. So the door
 13 itself is an FD30, rather than an FD60. The S would be
 14 a standard fit because it's off an internal corridor, if
 15 that's where the door is going to go. So this question
 16 here is: does it meet the requirements of being
 17 a 30-minute door, not a 60-minute door, 20-minute door?
 18 Is it a fire-rated door? So under the contract, are the
 19 30-minute door version — are they the 30-minute door
 20 version?
 21 Q. But you have put FD30.
 22 A. Yes.
 23 Q. Why did you not put FD30S as you had before?
 24 A. Because the door would be a 30, I'm asking the question
 25 here: under the contract, are they a 30-minute fire door

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1 version? As in: they're not the 60 or any other
 2 version; are they the 30?
 3 Q. Right. Let's go over the page {CST00013074/2}, then,
 4 paragraph 2:
 5 "Can it please be confirmed that the doors will meet
 6 all the requirements of the current Building Regulations
 7 and of the HM Government Fire Safety Risk Assessment
 8 guide for 'sleeping accommodation'? This includes the
 9 hinges, letter boxes, called letter plates, and any
 10 securing or locking mechanisms."
 11 A. Yes.
 12 Q. Then you go on, under "Note", in the second paragraph
 13 underneath the italics, to say this:
 14 "I have attached the relevant pages from Approved
 15 Document B (Fire Safety) Volume 2 for your information
 16 Section 5 General Provisions and Appendix B fire doors
 17 and I draw your attention to items 5.2, 5.5, 5.6 and
 18 5.11 of Section 5 General Provisions. Also to item 2 of
 19 Appendix B and item 2a, of table B1."
 20 Just help us, please, to try to get to the bottom of
 21 what that was that you attached.
 22 Can we please look at {CST00000006}. Do you think
 23 that this was the document that you attached?
 24 A. It looks like the document that would be the correct one at
 25 the time.

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1 Q. It says there at the top:
 2 "Good morning, after the meeting yesterday here is
 3 relevant information regarding flat entrance doors,
 4 I have highlighted the two parts in green. Carl."
 5 A. Yes.
 6 Q. It looks from that that this is what you sent.
 7 A. Yes.
 8 Q. Yes.
 9 Now, if we look down the document at page 2
 10 {CST00000006/2}, please, it says "Appendix B: Fire
 11 doors"; do you see that?
 12 A. Yes.
 13 Q. Then if you look at 1 on the left —hand side at the top
 14 of the screen, you haven't marked it in green, but it
 15 nonetheless says:
 16 "All fire doors should have the appropriate
 17 performance given in Table B1 either:
 18 "a. by their performance under test to BS 476—22
 19 Fire tests on building materials and structures, Methods
 20 for determination of the fire resistance of
 21 non—loadbearing elements of construction, in terms of
 22 integrity for a period of minutes, e.g. FD30. A suffix
 23 (S) is added for doors where restricted smoke leakage at
 24 ambient temperatures is needed ..."
 25 Now, you didn't highlight that, but you were aware

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1 of that, weren't you?
 2 A. Correct, yes.
 3 Q. Why didn't you highlight that, do you know?
 4 A. I'm going to say because the questions asked at the time
 5 were — this is only relevant to the questions that were
 6 asked of me at the time, at the meeting, so
 7 self —closing — so I've highlighted the parts that
 8 I answered their questions from.
 9 Q. Right.
 10 Then if you look a little bit lower down the
 11 left —hand column, if we can scroll down to the foot of
 12 page 2, you can see at the very bottom of the page:
 13 "The requirement (in either case) is for test
 14 exposure from each side of the door separately, except
 15 in the case of lift doors which are tested from the
 16 landing side only."
 17 Now if we look at the right —hand side column of
 18 page 2, you have highlighted in green paragraph 2, and
 19 particularly the last part of that:
 20 "... (self —closing devices are still necessary on
 21 flat entrance doors)."
 22 A. Correct.
 23 Q. Then on page 3 {CST00000006/3}, paragraph 2a in
 24 table B1:
 25 "2. In a compartment wall:

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1 "a. If it separates a flat from a space in common
 2 use."
 3 Then you see it says FD30S.
 4 A. Correct.
 5 Q. So you have advised in your 7th and then revised
 6 10 March 2011 letter that we were looking at that
 7 Manse Masterdor should confirm that the doors would be
 8 FD30, but you've highlighted here the provisions of ADB
 9 that specifically say that the door needs to be FD30S.
 10 A. Correct.
 11 Q. Can you explain that?
 12 A. Because the door needs to be an FD30, and if it's being
 13 located in any situation where the flat is onto a space
 14 in common use, it must have the S.
 15 Q. Yes. So why not say FD30S in your letter rather than
 16 FD30?
 17 A. Because the door is FD30. Depending where it's used,
 18 you put the S in or not.
 19 Q. Right.
 20 So I can understand this better — because,
 21 I confess, I'm slightly puzzled at the moment — if we
 22 go back to your letter, please, at {CST00013074/1}, your
 23 first question, if we scroll down to the bottom part of
 24 the screen, why are you asking that the doors that are
 25 to be fitted under the contract are FD30 as opposed to

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1 FD30S?
 2 A. Because the S is an additional item on the door, so I'm
 3 asking there, they're to confirm that the doors are FD30
 4 doors.
 5 Q. Did you think that the FD30 doors were not going to be
 6 flat front doors leading on to a communal area?
 7 A. They would be FD30 doors. I'm asking for them to
 8 confirm they are FD30, and then the second part of the
 9 information is, if they're on any route on to a common
 10 area, they must have the S fitted.
 11 Q. You don't make it clear in this letter, do you, that for
 12 those doors that are not leading from a flat to a common
 13 area, they don't need to be FD30S but need only be FD30,
 14 but for flat front doors they need to be FD30S?
 15 A. If they're off a protected route.
 16 Q. But you don't make that clear here, do you?
 17 A. This letter is after a meeting and discussion, and this
 18 letter is relevant to that meeting. So the parties in
 19 that meeting would have been — we'd have all had this
 20 discussion at the time. I'm providing this as an update
 21 to clarify from the meeting.
 22 Q. Right.
 23 So just to be absolutely clear, can we go to the
 24 second sentence. You say here — and this might be
 25 relevant:

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1 "I believe that in the first phase the entrance
 2 doors that are being replaced are in the protected
 3 staircases ie internal doors on staircases of buildings,
 4 not entrance doors off open walkways/balconies ie
 5 external doors."
 6 A. Correct.
 7 Q. Does that help you?
 8 A. Yes, because —
 9 Q. Could you explain?
 10 A. Well, if they were off external balconies/open walkways,
 11 they would be FD — they would not require the S.
 12 Q. I get that point, but what about internal doors on
 13 staircases of buildings?
 14 A. Would have to have the S.
 15 Q. Sorry?
 16 A. Would need the requirement of the S.
 17 Q. Exactly, they would need the requirement of the S, and
 18 therefore, given that you're talking here about doors
 19 that need the S, why is your question in 1 limited to
 20 FD30?
 21 A. Because I'm asking the question in 1: can they confirm
 22 the doors are FD30 doors to start with and not any other
 23 rating of door.
 24 Q. Why?
 25 A. Because you can get other ratings of doors. You can get

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1 60s, 20s.
 2 Q. Did you ever, standing back from this debate, explain
 3 the provisions of Approved Document B relevant to fire
 4 doors in these locations to Janice Wray, and
 5 particularly the need for smoke leakage testing on both
 6 sides?
 7 A. Whether smoke leakage testing on both sides would ever
 8 come up, I don't know, but we would have had the
 9 conversation about smoke seals being required on doors
 10 off common parts, on new doors as they're fitted, to
 11 comply with Building Regulations requirements.
 12 Q. You say you would have had the conversation —
 13 A. I would imagine we've had it more than once, yes.
 14 Q. Imagining is always insightful, but can you remember
 15 a conversation you had with Janice Wray or
 16 Abigail Acosta when you told them that the internal
 17 doors needed to restrict smoke leakage?
 18 A. It would have been — because this letter would have
 19 been a result of that meeting, so therefore it would
 20 have been discussed, otherwise I wouldn't have sent the
 21 Building Regulations requirements highlighting in green
 22 why they are required.
 23 SIR MARTIN MOORE—BICK: Just help me with this, if you
 24 would: as a matter of structure —
 25 A. Sir.

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1 SIR MARTIN MOORE—BICK: — the smoke seals are fitted where?
 2 A. Can be fitted on the door edges, can be fitted in the
 3 door frames. Different doors, different — how it's
 4 constructed. It's how the door has been tested at the
 5 test laboratory.
 6 SIR MARTIN MOORE—BICK: Yes, but if I've understood you
 7 correctly, a door with smoke seals fitted around the
 8 edges — and we can forget for a minute the door frame
 9 for this purpose — could be regarded as an FD30, if
 10 it's a 30, S.
 11 A. Sir.
 12 SIR MARTIN MOORE—BICK: If you were going to fit smoke seals
 13 into the door frame —
 14 A. Sir.
 15 SIR MARTIN MOORE—BICK: — you could then draw a distinction
 16 between the door and the door set.
 17 A. Correct.
 18 SIR MARTIN MOORE—BICK: So, actually, to refer to the doors
 19 as being FD30 isn't inapposite because the seals might
 20 be fitted to the door itself.
 21 A. Correct, and these are uPVC doors, and in — when you
 22 have that sort of structure, normally the smoke seals
 23 are always in the frame.
 24 SIR MARTIN MOORE—BICK: Yes. All right, thank you.
 25 Sorry, Mr Millett, I just wanted to understand

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1 clearly whether we were talking about the door, the
 2 door set or somewhere between the two.
 3 MR MILLETT: Yes.
 4 A. Can I confuse you as well, sir, by saying that there's
 5 now products on the market where you don't have it in
 6 the door edge or in the door frame, it's actually on the
 7 horizontal plane. It's called — one of the product
 8 names is Batwing, and it actually goes into the groove
 9 and you just self-adhesive and put it in the groove.
 10 SIR MARTIN MOORE-BICK: All right. Yes, thank you.
 11 MR MILLETT: Now, can we go to your first witness statement,
 12 page 30 {CST00003063/30}, paragraph 89. You say:
 13 "At the request of Ms Wray and Abigail Acosta
 14 (a KCTMO Project Manager) ... I attended the trial
 15 installation of the first installed fire-door at the
 16 Tower on 11 May 2011 (as it so happened this was
 17 Flat 16), along with a representative from LHC, the
 18 surveyors instructed by the KCTMO to observe the
 19 replacement door installations."
 20 Then if you go on to paragraph 61 of your second
 21 witness statement at {CST00030186/16}, you explain
 22 further the purpose of your presence at that meeting,
 23 and you say:
 24 "In respect of my attendance on site on 11 May 2011,
 25 to observe LHC's inspection of the door installed by

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1 Masterdor at Flat 16, I have little to add to my
 2 comments at paragraph 89 of my First Statement and the
 3 documents referred to therein. I understood that I was
 4 asked to attend by the KCTMO to observe a single sample
 5 door being installed. Although therefore I observed the
 6 installation of this door on this one occasion, the
 7 purpose of my presence was to ensure that LHC's
 8 inspection process [you've underlined that] for all
 9 other doors in the building that were to be changed by
 10 Masterdor (the installation of which I would not
 11 witness) was sufficient for me and/or KCTMO to rely on
 12 when addressing this issue in an FRA."
 13 Can you explain a little bit further: why did you
 14 need to check LHC's inspection process?
 15 A. For personal comfort that the actual door had been
 16 fitted soundly, correctly, proficiently.
 17 Q. I can understand you attending to make sure that they
 18 fitted the door soundly and correctly, but you make
 19 a point in this paragraph twice that your purpose of
 20 your presence on site on that day was to observe LHC's
 21 inspection or inspection process, rather than
 22 installation. Why is that?
 23 A. The documentation that was being used at the time — at
 24 this particular time, if my memory serves me correctly,
 25 there was very much within the world of door fitting

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1 a contract that had gone horribly wrong, I'm going to
 2 say Stoke-on-Trent, it cost the council millions to put
 3 right, where the doors were not fitted correctly, and
 4 that was in my mind at the time, and also the
 5 documentation copy, you know, I was looking at, did it
 6 have all the information that was needed? Because I was
 7 going to have to rely on this, that the installation was
 8 correct. They are the third party inspecting all these
 9 doors, and I just — for my own comfort.
 10 Q. When I first read this paragraph I thought you might
 11 have made a mistake, and instead of "installation" put
 12 the word "inspection", but do you actually mean
 13 inspection there as opposed to installation?
 14 A. Yes, if that's what I've put, that was — so my
 15 inspection of the doors to see that the door's under the
 16 architrave, was it being fitted correctly, were there
 17 gaps.
 18 Q. I follow that, but that doesn't tell you anything about
 19 the inspection process to be undertaken by the LHC, it
 20 tells you about the installation.
 21 A. Yes, it does.
 22 Q. So can we read, instead of the word "inspection" in
 23 those two places in that paragraph, the word
 24 "installation"?
 25 A. Yes.

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1 Q. Right.
 2 Now, you were able to watch the installation; do you
 3 remember whether there was any discussion about the
 4 fire safety standards of the door or the door furniture
 5 or door frames?
 6 A. I would have checked at the time whether there was
 7 a discussion. I wouldn't have discussed it with the
 8 contractors fitting the door because they were the
 9 fitters of the door, but I would have checked with —
 10 that the door was an FD30 door.
 11 Q. And how would you have checked that?
 12 A. Well, normally on one of the doors there would be
 13 a sticker on the door to show me that the door is —
 14 would have "FD" on there somewhere.
 15 Q. Right, and FD30 or FD30S?
 16 A. Remember, the door would be 30 because the S is in the
 17 frame.
 18 Q. Right.
 19 Were you given any product literature in relation to
 20 these doors that were being installed on that occasion
 21 other than that which you have exhibited to your
 22 statements?
 23 A. That's what I had.
 24 MR MILLETT: Now, after this site visit in May 2011, you
 25 wrote to Janice Wray, {CST00000991}, please.

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1 Mr Chairman, I'm just looking at the time. We can
 2 certainly go to this letter, but there are a number of
 3 questions about it.
 4 SIR MARTIN MOORE—BICK: Would you rather break at this
 5 point?
 6 MR MILLETT: It's probably sensible to break at this point.
 7 SIR MARTIN MOORE—BICK: Well, it's slightly earlier than
 8 usual, Mr Stokes, but we will take a break now.
 9 Come back, please, at 11.30.
 10 THE WITNESS: Sir.
 11 SIR MARTIN MOORE—BICK: And don't talk to anyone about your
 12 evidence while you're out of the room, please. All
 13 right?
 14 THE WITNESS: Yes, sir.
 15 SIR MARTIN MOORE—BICK: Thank you very much.
 16 (Pause)
 17 Right, 11.30, then, please. Thank you.
 18 (11.15 am)
 19 (A short break)
 20 (11.30 am)
 21 SIR MARTIN MOORE—BICK: All right, Mr Stokes, ready to keep
 22 going?
 23 THE WITNESS: Thank you, sir, yes.
 24 SIR MARTIN MOORE—BICK: Thank you very much.
 25 Yes, Mr Millett.

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1 MR MILLETT: Yes.
 2 Mr Stokes, can I go back, please, to the letter we
 3 were about to look at, {CST00000991}.
 4 This is a letter of 23 May 2011, if we can just
 5 scroll to the top of that to see the date, and the
 6 subject is:
 7 "The fitting of the first replacement entrance door
 8 to flat 16 Grenfell Tower."
 9 You say:
 10 "Thank you inviting me [sic] to view the
 11 installation of the first replacement entrance door to
 12 flats 16 of Grenfell Tower on the 11th May, my comments
 13 are limited to that of the fire requirements needed to
 14 be compliant with the Fire Safety Order 2005. From the
 15 information given to me by the installation team on site
 16 and the technical sheets beforehand by yourselves the
 17 door fitted was a fire rated version (FD 30) of the
 18 'Suredor GRP' range manufactured ... by
 19 Manse Masterdor ..."
 20 So after the trial door installation, it seems that
 21 you provided your opinion on whether the door or doors
 22 complied with the requirements of the Fire Safety Order
 23 and Approved Document B; yes?
 24 A. Correct.
 25 Q. And you confirmed that they were FD30; yes?

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1 A. From the information I was given, yes.
 2 Q. And that was contrary to your advice, wasn't it, of the
 3 requirements for the doors which you gave before the
 4 installation, which was that, at least according to the
 5 parts of ADB that you highlighted in green, they should
 6 be FD30S?
 7 A. I disagree. The doors are FD30, and as it says in this
 8 document, the — so it says here the door fitted was
 9 an FD30, and then it says there is fitted — reinforced
 10 frame — "the door was fitted with self closing device,
 11 intumescent and cold smoke seals". So therefore that
 12 makes it the S.
 13 Q. So you're referring, are you, to lower down the
 14 paragraph?
 15 A. Correct.
 16 Q. It doesn't say anything about FD30S in there, does it?
 17 You don't refer to that.
 18 A. No, but it says on there, "intumescent and cold smoke
 19 seals and a fire rated letter box".
 20 Q. When you sent the green-highlighted version of Approved
 21 Document B to Janice Wray, under cover of your earlier
 22 letter that we saw, 10 March 2011, you didn't explain to
 23 her, did you, that the FD30S in the table we looked at
 24 was to be arrived at by way of an accumulation of
 25 characteristics: first of all an FD30 door, but some S

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1 added by virtue of the presence of cold smoke seals
 2 somewhere? You didn't do that, did you?
 3 A. Well, I can't tell you I didn't do it and I can't tell
 4 you I did it, it's a long time ago, but the documentary
 5 evidence in the information I gave her would have had
 6 that information in it. But I'm sure I would have
 7 covered it, the same as I've covered it with you this
 8 morning: the door is an FD30, the S can come in the
 9 frame.
 10 Q. You don't say here that because the door is FD30 and
 11 because there are cold smoke seals, therefore the door
 12 should be regarded as or was an FD30S door and therefore
 13 compliant with Approved Document B. We don't see you
 14 say that here, do we?
 15 A. No.
 16 Q. Why is that?
 17 A. The information here would make it an FD30S.
 18 Q. Where were the cold smoke seals?
 19 A. In the door frame.
 20 Q. In the door frame.
 21 Now, do you remember what information you were given
 22 by the installation team on site, if any?
 23 A. No, is the honest answer.
 24 Q. Do you remember what technical sheets you looked at
 25 before your visit?

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1 A. It would be the information I've provided, if I've still
 2 got that information.
 3 Q. Right. Was that what you exhibited to your second
 4 witness statement?
 5 A. If that's the information I have, yes.
 6 Q. Let's look at that. It's exhibited to paragraph 59, at
 7 page 15 of your statement. Let's have a look at that,
 8 {CST00030186/15}. Let's go into the statement first and
 9 then look at the exhibit.
 10 You say there at paragraph 59:
 11 "I was asked to comment on certain
 12 Manse Masterdor ... literature — see [and then there are
 13 some exhibits that you have referred to] ... which
 14 I believe I downloaded as a pdfs from Masterdor's
 15 website. My review of this material was desktop in
 16 nature only and I was really only checking that the
 17 doors were available as 30 minute fire doors, which were
 18 required, as I had informed the KCTMO."
 19 You refer to three exhibits there: {CST00002306},
 20 {CST00002070} and {CST00000116}.
 21 Did you look at all three of those documents on the
 22 same occasion?
 23 A. Without seeing the documents, I can't tell you that.
 24 Q. Well, let's look at the first and second of those.
 25 {CST00002306} and {CST00002070}.

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1 First, {CST00002306}, and this says "Masterdor
 2 Information", and if you cast your eye down the page,
 3 that's the limit of it.
 4 You can see that it says, under "Fire doors", that
 5 they achieve 30 and 60 minutes' fire resistance. Do you
 6 see that?
 7 A. Yes.
 8 Q. They don't say what standard the doors are, do they?
 9 A. No.
 10 Q. They don't say what tests the doors have undergone, do
 11 they?
 12 A. In this document, no.
 13 Q. So on that document you couldn't have made your
 14 assessment of the standards of the doors, could you?
 15 A. Only inasmuch as it says, "Our [doors have] been
 16 developed to the highest specifications and tested to
 17 exacting standards [of] ..."
 18 Q. Yes, but that didn't tell you what the standards were?
 19 A. No, but that's the information I'm going on at the time
 20 that I've been given.
 21 Q. You could certainly see that it doesn't say that they
 22 are either FD30S or even FD30.
 23 A. Correct.
 24 Q. Yes. That's the first document.
 25 Let's look at the second one, {CST00002070}.

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1 That's what we have for that, which is what you
 2 exhibit. This is available style options, and there is
 3 some nomenclature or tag beneath each one, but they
 4 aren't fire safety standards, are they, they're just
 5 serial numbers, I think?
 6 A. It's the flame at the bottom right is — the legend says
 7 "Available as a 30—minute fire door".
 8 Q. Yes, but not FD30 or FD30S. You can't tell, can you?
 9 A. FD30 — it says "Available as a 30—minute fire door",
 10 which is FD30.
 11 Q. All right. But that's as much as you can tell, isn't
 12 it?
 13 A. Correct.
 14 Q. Now, that's just telling you what's in the range, it
 15 doesn't tell you what was fitted and whether that was
 16 a 30—minute fire door, whether 30S or 30 alone.
 17 A. Correct.
 18 Q. Yes.
 19 Let's look at the third document you've exhibited,
 20 which you say you looked at, {CST00000116}.
 21 This is the Suredor specification. If you go,
 22 please, to page 6 in that document {CST00000116/6}, it
 23 does say, "Composite fire door FD30", so that tells you
 24 that it was an FD30. So this document tells you it's
 25 FD30; yes?

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1 A. Correct.
 2 Q. But not FD30S.
 3 A. Correct. But it says, "Tested to BS 476 [Part] 22".
 4 Q. Indeed.
 5 So is it that document which you reviewed which told
 6 you that the fire door was an FD30?
 7 A. The information in front of me, yes, and I asked for the
 8 clarification of this in my letter.
 9 Q. Now, if we go to {CST00003149}, please, this is a letter
 10 you wrote to Abigail Acosta of the TMO on 24 June 2011,
 11 and again the subject matter is:
 12 "The required fire standards for entrance doors to
 13 residential flats."
 14 If you look at paragraph 1, it's quite lengthy, but
 15 if you look at the very end of it, the last four lines
 16 of the first paragraph before the break, it says:
 17 "The specifications of a fire door and the standard
 18 required in a particular location is specified by Part B
 19 of the Building Regulations in Appendix B, (Fire Doors)
 20 and the performance of fire doors is judged by
 21 subjecting them to the standard test procedure specified
 22 in BS 476: Part 22: 1987 or BS EN 1634—1: 2000."
 23 Then if you skip the next paragraph and go down to
 24 the bottom — well, sorry, let me just read to you, in
 25 light of your answers, the last sentence of that

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1 paragraph I was going to skip. Do you see it says:
 2 "Also incorporated in the door could be fire rated
 3 glazed panels and in new fire doors would be cold smoke
 4 seals and intumescent seals or strips."
 5 So are you saying there that in new doors, there
 6 would be cold smoke seals and intumescent strips which
 7 would make them FD30S?
 8 A. Correct.
 9 Q. Then you go on:
 10 "The current Building Regulations requirements for
 11 an entrance door to a dwelling/flat etc off a protected
 12 staircase or corridor is that it should be a minimum
 13 fire resistance of 30 minutes when tested for integrity
 14 to BS 476 part 22 fitted with a self closing device and
 15 intumescent strips and cold smoke seals, ie suffix
 16 '(s)'."
 17 Then if we turn to page 2 {CST00003149/2},
 18 "Conclusion", you say:
 19 "From all the technical information provided by the
 20 manufacturers and the inspection sheets provided by LHC,
 21 the new flat entrance doors supplied and fitted by
 22 Manse Masterdor meet the requirements of the
 23 Building Regulations in that the doors are FD 30 (s)
 24 this includes all the door furniture fitted to or on the
 25 doors. Any glazing fitted in the doors is fire rated

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1 according to the information [provided] as is any
 2 glazing fitted surrounding the doors."
 3 You say you looked at the technical information
 4 provided by the manufacturers there; was that the same
 5 literature as we've just looked at, the three pieces of
 6 data that we looked at that you exhibited to your second
 7 witness statement?
 8 A. This is later, isn't it? Would I have not seen anything
 9 else at a later date?
 10 I never did see the actual test certificates, but
 11 from the information I was given, it all appears that
 12 the doors meet the requirements of the Building
 13 Regulations as FD30S doors if that was what was needed
 14 on an internal corridor, or FD30 if off an open,
 15 external door.
 16 Q. Let me just be clear. You attended on 11 May and you
 17 had seen the three pieces of information you have
 18 exhibited.
 19 A. Yes.
 20 Q. You're now writing in June. Was there any further
 21 technical information provided by Manse Masterdor that
 22 you saw between your 11 May visit and your writing to
 23 Abigail Acosta on 24 June 2011?
 24 A. I'm going to say no.
 25 Q. No?

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1 A. So that's visual on the day of the inspection, what
 2 I saw on the day, and information provided.
 3 Q. Can we proceed, then, on the basis that the technical
 4 information provided by the manufacturers to which you
 5 refer under your conclusion here is the three pieces of
 6 information you exhibited to your second witness
 7 statement?
 8 A. Correct. The only — looking at this, the only other
 9 probably piece of information I would have been provided
 10 would have been LHC's report on that door.
 11 Q. What had you seen in the technical information to tell
 12 you that the doors that were supplied and fitted, as you
 13 say, were FD30S doors, as you say?
 14 A. Seen in the technical information would have been the
 15 standard to BS 476—22. Visually on site, actually
 16 seeing the door with the seals in the frame.
 17 Q. Did Manse Masterdor provide the frame as well?
 18 A. Yes, it's a whole door set.
 19 Q. It's a door set, isn't it?
 20 A. Yes.
 21 Q. Yes. So is what you're saying here that the new flat
 22 entrance doors supplied and fitted by Manse Masterdor
 23 are FD30S?
 24 A. Correct.
 25 Q. But the literature we saw doesn't say that, does it?

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1 The literature we saw says that the fire doors are FD30
 2 and only in one place?
 3 A. The doors, correct. But this is the whole door frame —
 4 the whole door set we're talking about now and the seals
 5 are in the door frames.
 6 Q. The technical information told you that the door was
 7 FD30.
 8 A. Correct.
 9 Q. So why were you telling Abigail Acosta that the
 10 technical information told you that the door supplied
 11 and fitted, the new flat entrance doors supplied and
 12 fitted, are FD30S?
 13 A. Because visually I would have seen the S on site.
 14 Q. So not the technical literature, your personal
 15 observation?
 16 A. Yes.
 17 Q. That's not what this letter says, is it?
 18 A. The new flat doors supplied and fitted, so — "and
 19 fitted", I was on site when they were fitted.
 20 Q. Do you also agree that what you were saying here was
 21 contrary to your letter to Janice Wray of 23 May 2011
 22 where you said that the doors were only required to be
 23 FD30?
 24 A. The doors are FD30. The S is in the frame. The whole
 25 door set makes up FD30S, with the self-closer, the

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1 letterbox fire rated, the spy hole, et cetera,
2 et cetera.
3 Q. Can you see from the debate we've been having over the
4 last hour or so how there might be room for confusion
5 here?
6 A. No, I can't, because we're talking — people, I'd like
7 to think, would understand — in this particular context
8 here, this is the project manager who is understanding
9 the specification that she's required. I can understand
10 for a layperson picking up the documentation, but that's
11 no different from a layperson picking up Building
12 Regulations and trying to understand appendix B with all
13 the different boxes in it.
14 Q. In your letter, you say also that the FD30S standards
15 includes all the door furniture fitted to or on the
16 doors, any glazing fitted in the doors is fire rated,
17 et cetera.
18 A. Not the S doesn't, the S is just a suffix to say that
19 it's got a cold smoke seal fitted.
20 Q. How did you know that the door furniture complied with
21 the Building Regulations?
22 A. On that door? Because it says on there it's 476—22.
23 Q. Door furniture?
24 A. Well, it comes with the furniture. It would have been
25 fire tested with the furniture on it.

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1 Q. There is nothing in the literature about the door
2 furniture. I haven't shown it to you in detail, but
3 there isn't.
4 My question is: was this just an assumption you were
5 making or did you actually verify this from any data?
6 A. I would not have known that, but the door set would have
7 come as per with the door furniture as it was tested.
8 Q. I see. So is what you're saying here your interpolation
9 of the mere fact that the manufacturer said that it had
10 passed 476—22?
11 A. And also LHC have looked at it, and I would like to
12 think that someone in the TMO would have had all the
13 certification for that door, which was part of the
14 documentation I asked for from them, that they should
15 have the test certificates for that door.
16 Q. Self-closing devices, did you ask for product
17 information on those?
18 A. No, that was part of the door furniture, would come as
19 a door set.
20 Q. You didn't ask to see the test certificates for the
21 self-closers?
22 A. No.
23 Q. Right. Let's look in a little —
24 A. The whole project was overseen by a project manager, and
25 each door was overseen by a third party, LHC, who I was

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1 relying on to undertake the inspection of the door as
2 fitted to comply.
3 Q. Yes, that's not really an answer, though, is it, because
4 you were actually asked for specific advice about the
5 fire safety compliance of the new doors being fitted —
6 A. Correct, and —
7 Q. — as an independent fire risk assessor?
8 A. I was just giving you factual information that, as far
9 as I was aware, I undertook — as a fire risk assessor,
10 from what I had in front of me, the door was compliant.
11 Looking at the technical information would have been LHC
12 and the project manager's responsibility, which — I was
13 doing the part that I was asked to do.
14 Q. Can we then focus on self-closing devices a bit more
15 closely.
16 Can we go back in time, then, to 2010 and your
17 letter of 10 November of that year at {CST00002660}.
18 We've looked at this earlier this morning.
19 Can we go, please, to page 2 in that letter
20 {CST00002660/2}, under "Items to consider". That's the
21 first page of that, and you can see "Options" at the
22 bottom, and then "Items to consider" is on page 2.
23 Just looking at it and reminding yourself of it,
24 generally speaking, do you remember what the purpose of
25 that advice was?

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1 A. I would have been asked for it.
2 Q. Well, what were you asked for?
3 A. I can't tell you at the time, that — if I was asked for
4 something, I would have written it down afterwards.
5 Q. Right.
6 At paragraph (c), you say this:
7 "An inspection system to make certain that the
8 occupants of the flats do not disconnect or disable the
9 self closing devices once they have been fitted."
10 At the time of this letter, so November 2010, what
11 was your understanding of what inspection system was
12 required?
13 A. For fire doors?
14 Q. No, for self-closing devices.
15 A. They should be fitted to fire doors.
16 Q. Sorry. What was your understanding of what inspection
17 system was required —
18 A. At that time —
19 Q. — for self-closing devices on fire doors?
20 A. At that time I believe the standard was regular
21 inspection should be undertaken.
22 Q. Did Janice Wray discuss that issue with you at this
23 time?
24 A. I've got no idea, ten years ago, whether that was
25 discussed at that time, no.

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1 Q. Did you provide any advice to Janice Wray about what was
2 required by way of an inspection system for self-closing
3 devices on fire doors?
4 A. If I'd have been asked, I would have provided the
5 requirements at the time or whatever time I was asked,
6 which I would — yeah, I would just have provided that
7 information.
8 Q. Right.
9 Now, moving into 2011, can we go, please, to
10 {TMO00847318}. This is a letter dated 30 April 2011
11 from you to Janice Wray, and if we scroll a little bit
12 down the screen, you can see that it says:
13 "Summary of items and topics in the document
14 fire safety in purpose-built blocks of flats (draft:
15 18th April 2011)."
16 Just to be clear for everyone else's benefit, you're
17 giving her advice, it looks like, on the contents of the
18 draft LGA guidance.
19 A. Correct.
20 Q. Which hadn't yet been published, but was in draft and
21 presumably in circulation in the industry.
22 A. Yes.
23 Q. Yes, and presumably you had read it.
24 A. And made comments on it.
25 Q. Indeed.

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1 Now, if we look at this document a little bit more
2 closely, first, do you remember, were you asked by
3 Janice Wray to provide you with advice on that document
4 or did you volunteer it?
5 A. I can't answer that, I wouldn't know. If I had that
6 information I would have passed it on because it was
7 relevant to the door replacement programme.
8 Q. Yes.
9 Let's go to page 1 at the bottom, if we just scroll
10 down. You cite from the then draft paragraph 68.2,
11 which says this:
12 "As flat entrance doors are required to be
13 self-closing, there is a risk that any self-locking
14 security devices fitted to the doors could
15 [accidentally] lock residents outside of their own
16 flats. As well as being a general nuisance for
17 residents who may leave their keys inside the flat,
18 there is also a risk during a fire, if residents leave
19 their flat and dependent family members remain inside
20 the flat. The danger in these circumstances is that
21 residents may resort to removing or disconnecting the
22 self-closing device."
23 Now, just pausing there, would you agree that at
24 this time, which is at the time of the door replacement
25 programme or certainly before it — and I should just

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1 make the point that this letter is April 2011, not
2 April 2010, as it says, it's an error — at this time,
3 you made it clear to Janice Wray that it was important
4 that there be self-closing devices and brought to her
5 attention the risks that residents might remove or
6 disconnect those devices?
7 A. Correct.
8 Q. Yes. Did you ever have a conversation with her about
9 that risk, do you remember?
10 A. About removing self-closing devices?
11 Q. Yes, about the risk that residents might remove the
12 self-closing devices.
13 A. I think that was probably had on more than one occasion.
14 Q. Is there any reason why you didn't set out in your
15 letter the provisions from the draft LGA guide about
16 setting up a programme of planned preventative
17 maintenance for flat entrance doors?
18 A. No.
19 Q. No.
20 Can we then move on in time into June 2011,
21 {TMO00867377/2}. This is an email that you sent to
22 Abigail Acosta, towards the foot of your screen, on
23 24 June 2011:
24 "Abi
25 "Good morning, I visited King Charles House

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1 yesterday and two residents showed me their new flat
2 entrance doors."
3 Then in the third paragraph you say:
4 "Flat 13 the self closing device has come out of the
5 door, the occupant contacted TMO and explained this and
6 it was a newly fitted door etc and the TMO call person
7 stated that Morrisons who come out and fix it."
8 Do you remember that?
9 A. Not off the top of my head, but I've written it, so yes.
10 Q. Right. Do you agree that it's a good example of how
11 self-closing devices might fail?
12 A. Yes.
13 Q. Yes. And that happens from time to time, doesn't it?
14 A. Yes.
15 Q. Yes.
16 Then if we go to 21 July 2011, and another email to
17 Abigail Acosta, at {TMO00867783/3}, email at the foot of
18 the page, please, entitled "RE: New doors at
19 Grenfell Tower":
20 "Abi Good morning
21 "On Tuesday I was at Lancaster West and was informed
22 that the self closing device on 3 of the new flat
23 entrance doors have come away from the door, this is the
24 same problem as in King Charles House. Are you aware of
25 this reoccurring fault?"

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1 Just to clarify, these are three doors at
 2 Grenfell Tower?
 3 A. Yes.
 4 Q. I don't suppose you can remember the numbers of the
 5 flats?
 6 A. No.
 7 Q. No. Did you note the flat numbers down?
 8 A. If I haven't put them in there, I probably wouldn't
 9 know.
 10 Q. Why is that?
 11 A. I've no idea, sorry.
 12 Q. It's quite important, isn't it, to know exactly which
 13 flats no longer have self-closers; no?
 14 A. Well, it is, but I don't know what context this is in.
 15 So it says here "I was at Lancaster West", it doesn't
 16 say "I was in the building". I could have been passed
 17 that information on by one of the caretakers.
 18 Q. Yes.
 19 A. If I'd have known — and if I'd have asked them which
 20 ones, and they'd said, "I don't know", I don't know what
 21 context, all I'm doing is passing on relevant
 22 information: are you aware of this reoccurring fault?
 23 What's the answer?
 24 Q. Yes, and to be fair to you, your email says, "[I] was
 25 informed that the self closing device on 3 of the new

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1 flat entrance doors", et cetera.
 2 Taking a step back, did you ask whoever it was who
 3 told you that what the flat numbers were?
 4 A. Well, I would have done.
 5 Q. Right. So why didn't you note that down and pass that
 6 on to Abigail Acosta so that she could fix them?
 7 A. Maybe they didn't know and it was a conversation that
 8 ended there.
 9 Q. Well, you're speculating.
 10 A. I'm speculating, yes.
 11 Q. Right, okay. You —
 12 A. If I had have known — sorry, sir, to interrupt — if
 13 I had have known, I'd have written them down.
 14 Q. Right.
 15 You say, "Are you aware of this reoccurring fault?"
 16 Were you concerned that there was a recurring fault with
 17 self-closing devices on these Masterdor doors?
 18 A. Yes, because otherwise I wouldn't have gone to her when
 19 I didn't need to to say, "There is a problem, are you
 20 aware of it?"
 21 Q. Yes.
 22 We can see her response, page 3 {TMO00867783/3},
 23 second email up the page. She says:
 24 "Carl hi
 25 "No I am not, thanks for bringing to my attention.

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1 "I will raise as concern at our next site meeting,
 2 I will send you invite, if you wish to attend.
 3 "Do you know why this may be happening
 4 (manufacturing issue, or [plain] incompetence by the
 5 installer ...?)"
 6 You replied. If you stay on the same page and look
 7 up to the email above it, you say:
 8 "As far as I can tell and remember from the King
 9 Charles House door the screws securing/holding the
 10 closer into the door are very short."
 11 We can see from the rest of the email chain, from
 12 page 2 up, if we just scroll up to page 2
 13 {TMO00867783/2}, that that was then raised by the TMO
 14 with Andy Webster of Masterdor, who said that they were
 15 going through the block, changing the fixings if
 16 necessary. You see he says, "changing the fixings if
 17 necessary". Do you see that?
 18 A. Yes.
 19 Q. Now, at the time, were you aware of that remedial work
 20 being undertaken in Grenfell Tower in response to what
 21 you identified as the recurring problem?
 22 A. I can't honestly say one way or the other, but I would
 23 expect something to happen, yes.
 24 Q. Do you know whether all the fixings had been changed or
 25 only those where Andy Webster deemed it to be necessary?

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1 A. Well, I would like to think that all of them were
 2 changed, but that would be a maintenance policy or
 3 procedure between Abigail Acosta and the company.
 4 Q. Yes. Did you seek to check any other doors at
 5 Grenfell Tower or ask the TMO about whether there had
 6 been any checks on other doors at Grenfell Tower to make
 7 sure that the problem wasn't recurring beyond those
 8 doors that you had identified?
 9 A. As part of the risk assessment process as I went round
 10 the building, I would have asked that question if I had
 11 access or asked anyone on site: is there a problem?
 12 Q. Right, and did you do that?
 13 A. Yes.
 14 Q. Right.
 15 A. If there had have been problems, it would have been
 16 highlighted in the significant findings as well as
 17 I went round the building.
 18 Q. You say, "significant findings as I went round the
 19 building". This is July 2011 and your next FRA is not
 20 until November 2012, is it?
 21 A. So when I — if — that was correct, yes.
 22 Q. Is there any advice you recall giving about this
 23 recurring problem before the next FRA in November 2012?
 24 A. I've got no recollection now.
 25 Q. No.

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1 Can we look at your advice of 4 August 2011, which
 2 is on self-closing devices but a very slightly different
 3 aspect of it. {TMO00867927}, please.
 4 Now, this is a letter you wrote to Janice Wray and
 5 the subject is:
 6 "The removal of the self closing device on a flat
 7 entrance door."
 8 So the topic isn't failure or the screws, it's about
 9 removal by tenants.
 10 I'm going to show you the text of that. Before
 11 I do, can I just show you what prompted you to give that
 12 advice.
 13 Can we go to {TMO00867924/2}, please. This is
 14 an email, the second email in the string. It's from
 15 Janice Wray on 28 July 2011, forwarding a concern raised
 16 by Lorna Cunningham with Abigail Acosta, and the title
 17 is, "Door Installation — Elderly":
 18 "Carl
 19 "Would welcome your view on the attached."
 20 If you scroll down page 2, you can see what was
 21 attached. Lorna Cunningham, who was a resident liaison
 22 officer with the TMO, raises with Abigail Acosta
 23 a problem she identifies. There is a lot of detail
 24 about it, and we don't need to go to it, but the basic
 25 point is that this is a lady of a certain age having

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1 trouble opening or closing the door, and having
 2 difficulty with it, and the lady finding that the door
 3 was very heavy and hurting her back, and therefore she
 4 wedges it open when she has to come in and out.
 5 Leaving aside the personal difficulties with that,
 6 you're asked for your view. That was the run-up to
 7 this, and the email asked you for that.
 8 You then respond in your letter of advice of
 9 4 August, and if we can go back to that, please, we can
 10 look at it, {TMO00867927}.
 11 She wants to remove the door-closer, and you say:
 12 "From the emails I have received and from the
 13 conversations with yourself and Abigail Acosta the issue
 14 in question is that some elderly tenants are finding it
 15 difficult to open their flat entrance doors when the
 16 flat entrance door is fitted with a self closing device.
 17 You have asked if a self closing device fitted to a flat
 18 entrance door located in a protected staircase or
 19 a protected corridor can be removed so as to aid the
 20 person opening the door."
 21 You then refer to the relevant legislation under the
 22 RRO. At the bottom you say:
 23 "I believe that by removing the self closing device
 24 from a fire door this could place the other residents of
 25 the building at risk, because if a fire was to occur

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1 within the flat the entrance door would not close
 2 automatically so the smoke and flame could enter the
 3 common parts of the building and would not be confined
 4 to the dwelling of origin. This is because there was
 5 a device fitted and you have now disabled or removed
 6 it."
 7 Then if you turn on, you can see you refer to the
 8 Building Regulations, the LGA guidance just released
 9 earlier that month, 1 August 2011.
 10 Then if you go to paragraph 3 on page 2 (sic)
 11 {TMO00867927/3}, it says:
 12 "The flat entrance doors are critical to the safety
 13 of the common parts ..."
 14 Then if you go to page 3 {TMO00867927/3} we can see
 15 the conclusion section, and if we look at the first
 16 paragraph in that, you say:
 17 "I would advise that self closing devices where
 18 fitted to a flat entrance door located in a protected
 19 staircase or a protected corridor should not be removed
 20 because the existing situation is being made worse, a
 21 Building Regulations term, and by removing the self
 22 closing device you could be 'placing one or more
 23 relevant persons at risk of death or serious injury in
 24 the case of a fire'.
 25 "There are alternative solutions to moving the

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1 self closing device from the flat entrance door, if you
 2 would like me to attend a meeting with the providers of
 3 the doors or with yourselves please instruct me."
 4 Were you asked to attend a meeting to resolve the
 5 problem?
 6 A. I can't remember.
 7 Q. Were you told whether the problem was resolved?
 8 A. I'm going to say I can't remember, but there would be
 9 other solutions, and if I was asked, I would provide
 10 alternative solutions. One of those could be
 11 an automatic opening device fitted to the door so it
 12 opened, releasing a bit of the tension on the closer,
 13 but there is other solutions as long as the door still
 14 shuts.
 15 Q. Do you remember giving that advice in respect of this
 16 particular flat or occupant?
 17 A. I can't say I remember per se giving that advice, but if
 18 I'd have been asked, I would have given it.
 19 Q. Do you remember whether you followed up on this problem?
 20 A. I've got no — I can't remember, but as it says there,
 21 "If you want me, please instruct me to do so".
 22 Q. Now, here we are in August 2011. You've had knowledge
 23 or information first that self-closing devices were
 24 coming away from the door frame or from the door, and,
 25 secondly, self-closing devices were causing the door to

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1 be too heavy for some occupants, causing them to remove
2 it or want to remove it.

3 Did those pieces of information give you any cause
4 for concern that these doors, and particularly the
5 self-closing devices on them, were not fit for purpose?

6 A. No, this is standard. The — goes for the elderly
7 person first, if I answer that question, that is
8 a standard problem. It's overcome in other, like,
9 residential care homes and that by having what's called
10 a swing free closing device on the door or an EMR,
11 electronic magnetic release, hold open device on the
12 door. There is other ways of solving the problem by
13 still having the self-closing device on there, still
14 having the door as a fire door, and making certain that
15 it complies with Building Regulations, but also helps
16 the occupier open the door.

17 Q. Were those solutions that you've just very helpfully
18 identified ever even considered for any of the buildings
19 in the TMO stock?

20 A. Sitting here now, I can't actually say yes or no to any
21 one, because my mind's whirling around, but if anyone
22 would have asked me, we would have gone through that,
23 but I can't give you a specific, say, at this flat, at
24 this time, in this block, this was done, but I'm sure it
25 would have been done if it had been asked for.

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1 Q. If it had been asked for, but you didn't suggest it?
2 A. If I'd have been asked — like here, we were having the
3 conversation now, Janice would have had this
4 conversation with me, "Is there anything we can do?",
5 and the answer would have been yes, the same as I've
6 just given you the information now.

7 Q. Do you ever recall — we've seen no evidence of it, you
8 see — ever saying to Janice Wray that one solution
9 might be, for residents who were finding the
10 self-closing devices as fitted particularly problematic,
11 that she should investigate fitting the alternatives
12 that you have identified?

13 A. That conversation would have happened, yes.

14 Q. You say it would have happened; do you remember it
15 happening?

16 A. No.

17 Q. No.

18 FRAs, on the subject. Let's look at that.

19 A. Sorry, could I answer your second — other part of the
20 question, sorry.

21 Q. Yes.

22 A. It was — there was a defect highlighted that the
23 devices, self-closers were coming away. A site meeting
24 was undertaken and, as far as I was concerned, it was
25 rectified by the manufacturer, by going back to site,

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1 and I heard no other comments made in the future of mass
2 door failings or self-closers failing, and I would have
3 asked that question and no information was ever given to
4 me about that.

5 Q. Did you know if the recurring problem with the
6 self-closing devices persisted at Grenfell Tower or did
7 you just assume from the silence about it that it
8 didn't?

9 A. I'm going to say that it was resolved, and my
10 understanding of the TMO's policies and procedures is if
11 there is any damage to a door, the tenant would inform
12 the TMO, and I met with repairs — well, they changed
13 their name, maintenance, Repairs Direct, and I would
14 like to think if there was recurring problems, either
15 Janice or them would have told me.

16 Q. You would like to think that, but did you know as a fact
17 whether the recurring problem with the self-closing
18 devices persisted at Grenfell Tower, or did you just
19 assume that because you didn't hear otherwise, they
20 didn't?

21 A. I assumed that it was rectified and I would have asked,
22 if — like, when I did my sample of door checks, I would
23 find out if there was closers fitted, did they work. If
24 they hadn't worked, I would have asked the person the
25 question: how long has this not worked? Why hasn't this

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1 been reported?

2 Q. Let's look at your fire risk assessments for
3 Grenfell Tower and the specific topic of flat entrance
4 doors, if we can.

5 You never had a target number of doors to inspect,
6 did you?

7 A. No.

8 Q. And really — is this right? — on your tours round the
9 building, you would really sort of take pot luck with
10 who was in and do what you could.

11 A. Pot luck, yes.

12 Q. Were you sent the LHC site visit reports?

13 A. I received some. On the initial stages, I think I was
14 getting them all the time, but I was getting
15 a thousand-odd, and I think after a while I expressed
16 a comment that unless there was any failures or I needed
17 to know if they were all okay, that was it.

18 Q. Now, can we look at one of them, {CST00002183}.

19 This is an LHC site visit report, "External Doors",
20 and it is from June 2011. We know that because if you
21 scroll down, please, to the bottom of the first page,
22 you can see "Date of visit: 6 June 2011", and it's
23 signed off by the technical officer and technical
24 manager.

25 If you turn to page 2 {CST00002183/2}, it says:

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1 "Grenfell Tower.
 2 "134 — door was inspected externally and it appeared
 3 to be professionally installed, however fixings and
 4 operation of door closer were not checked.
 5 "162 — this was a second visit to check that issues
 6 reported earlier have been rectified.
 7 "113 — door was inspected externally and it appeared
 8 to be professionally installed, however fixings and
 9 operation of door closer were not checked."
 10 Did you see this report at the time, do you think,
 11 June 2011?
 12 A. I can't tell you whether I saw it or not.
 13 Q. Were you provided with it, do you think, as part of your
 14 2012 FRA?
 15 A. I could have been, I wouldn't know.
 16 Q. Were you generally afforded access to reports such as
 17 these?
 18 A. Yes.
 19 Q. Now, if you had access to this document, can we assume
 20 that you would have looked at it?
 21 A. Yes.
 22 Q. And, having looked at it, can we proceed on the basis
 23 that you would have read this part under
 24 "Grenfell Tower"?
 25 A. Well, I would have read under most of them, because most

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1 of them it says here "fixings and operation of door
 2 closer were not checked".
 3 Q. Not checked, yes.
 4 When you then did your rounds of the relevant
 5 building, whether it's Grenfell Tower or
 6 Whitstable House, for the purposes of your FRAs, did you
 7 go to the flats or try to go to the flats to check the
 8 door—closers for yourself?
 9 A. I would try and check as many as I could. Whether I had
 10 this document or not, I would try to check as many doors
 11 as I could.
 12 Q. Indeed, but would it not have been useful for you to
 13 have this document in your hand when going round the
 14 building so that you could make a note or point of going
 15 to flat 134 and attempting to get access to the flat to
 16 see whether or the door—closer was working or not?
 17 A. Correct, if I had this document or was provided — it's
 18 the same with all the other documents.
 19 Q. Do you remember any occasion when you toured
 20 Grenfell Tower with a document such as this in your
 21 hands identifying which flats had door—closers which had
 22 not been checked by LHC?
 23 A. No.
 24 Q. No.
 25 Do you accept this: if your FRAs had identified no

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1 problems with self—closing devices and no problems with
 2 the internal elements of flat entrance doors, the
 3 consequence would or might be that your FRAs might be
 4 relied on as evidence that there were no problems with
 5 self—closing devices?
 6 A. Yes, I accept that. But, as I said, isn't it the TMO's
 7 policy that if there is a problem with a door, the
 8 resident should inform the TMO, and the caretakers
 9 actually undertake regular inspections of doors anyway?
 10 So mine is — my FRA is only a snapshot in time every —
 11 at this time, I believe, every three or four years,
 12 where they're in the building on a daily basis.
 13 Q. Let's look at your 2014 FRA.
 14 Before I ask you that, can I just ask you: to the
 15 best of your recollection, did you ever identify
 16 yourself a fault with a self—closing device on any door
 17 of any flat to which you did obtain access?
 18 A. I'm going to say yes, because I would have come across
 19 one in the tower or anywhere else, yes.
 20 Q. You did. And what would you do, having discovered that?
 21 Would you note that down in your FRA?
 22 A. On the significant findings.
 23 Q. On the significant findings. Would you do that as
 24 a matter of course?
 25 A. Yes.

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1 Q. So can we take it that the specific instances of
 2 specific flats where door—closers were found by you to
 3 be defective are identified in your significant findings
 4 and, where your significant findings are silent, it's
 5 because you found none?
 6 A. Correct.
 7 Q. Yes, I see.
 8 Now, if we can look, please, at your 2014 FRA, it's
 9 at {CST00003157/18}. This is the beginning of the
 10 section. This is "Means of escape from fire".
 11 If we turn to page 19 {CST00003157/19}, you can see
 12 the fourth—from—last tick—box, fourth from bottom, it
 13 says:
 14 "Where appropriate are any fire doors fitted with
 15 self closing devices and do these function correctly?"
 16 You have ticked "No". Do you see that?
 17 A. Correct, yes.
 18 Q. To be clear, was that in relation to flat entrance doors
 19 or the doors in the stairwell?
 20 A. Any fire door.
 21 Q. Including flat entrance doors; yes?
 22 A. Yes.
 23 Q. Why did you mark here that those were not functioning
 24 correctly, those self—closing devices were either not
 25 fitted or not functioning correctly?

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1 A. Because there were some that were defective.
 2 Q. Right.
 3 A. The question is:
 4 "Where appropriate are any fire doors fitted with
 5 self closing devices and do these function correctly?"
 6 Well, there is obviously somewhere I have found
 7 a fire door where the self-closing device is not
 8 functioning correctly, so ticked "No".
 9 Q. I see. So that's both fire doors in the protected
 10 stairway, or rather between the protected stairway and
 11 the communal area, and flat entrance doors?
 12 A. And fire doors on any other corridor anywhere else in
 13 the building that has a self-closing device.
 14 Q. I see.
 15 Let's see if we can just trace this down into your
 16 significant findings schedule, just to be clear.
 17 If you go to {CST00003177/4}, please, you will see
 18 in there item 12. This is all about the access doors;
 19 yes?
 20 A. Fire doors.
 21 Q. Fire doors, yes. Under (b) it's the access door to the
 22 external roof, and then (c) cupboards, (d) fire door to
 23 the refuse chute. Do you see that?
 24 A. Yes.
 25 Q. Then (e) fire door to the staircase from the lift.

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1 A. Yes.
 2 Q. Lift lobby areas. So that's all those.
 3 Then if you turn to page 5 {CST00003177/5}, you can
 4 see something not marked in red, but just "For Your
 5 Information":
 6 "The following flat entrance doors are the original
 7 fire rated flat entrance doors and which were fitted
 8 with a self closing device. These are flush solid doors
 9 and are all close fitting."
 10 Then you give a list of flats.
 11 A. Correct.
 12 Q. That list is not a list of flats where the self-closing
 13 device was either missing or defective, is it?
 14 A. No, this is just a statement.
 15 Q. Yes.
 16 A. I'm looking at 2014?
 17 Q. Yes, you are.
 18 So on that basis, can we take it that the "No"
 19 tick-box which we saw related to non-flat entrance
 20 doors, in other words fire door to the —
 21 A. Refuse chute room, et cetera.
 22 Q. — refuse chute, for example; yes?
 23 A. Yes.
 24 Q. Yes, I see.
 25 This list we're looking at in the "For Your

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1 Information" box, was that list derived from a specific
 2 inspection by you?
 3 A. Looking at this, and looking at the time, as in the
 4 date, I am going to say that the — these are
 5 leaseholder doors or doors in the building that have not
 6 been replaced with a new Masterdors, and therefore I'm
 7 just — for your information, if any of these flat
 8 entrance doors are replaced in the future, their
 9 replacement door must comply with all requirements of
 10 the Building Regulations when installed.
 11 Q. When you said that they were fitted with a self-closing
 12 device, where did you get that information from?
 13 A. Well, I would have checked the doors —
 14 Q. So did you check each of these flats?
 15 A. Well, I can't say that I checked every one of them, but
 16 I would have checked a sample, and if they're all the
 17 same doors, which were the original doors, they would
 18 have had a self-closing device.
 19 Q. That is my question, you see. Just on that, are you
 20 working on the basis that because these particular flats
 21 are flats with entrance doors that were not replaced in
 22 the programme, but which were the original fire-rated
 23 flat entrance doors, you're assuming that they were
 24 fitted with a self-closing device, or did you actually
 25 inspect each one to ensure that the self-closing device

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1 was present and working on each flat front door?
 2 A. I would have checked originally and made the assumption
 3 that, as they were the original doors and fitted with
 4 them, they all still had them and they all still worked.
 5 Q. Can we then look at 2016.
 6 Do you remember that in July 2015 you were emailed
 7 about flat 45 of Grenfell Tower, where there had been
 8 an incident? Do you remember that?
 9 A. No.
 10 Q. No. Well, I'll show you an email, {CST00002919/2}.
 11 That's where we start. There is a bit of a run-up to
 12 this.
 13 There is an email on the bottom part of your screen
 14 from Glenn Duggan of the Metropolitan Police to
 15 Janice Jones and he says:
 16 "Jan,
 17 "Yesterday I visited 45 Grenfell Tower.
 18 "I examined the front door which appears to be a
 19 Suredor SG34 Composite door fitted with a Winkhaus
 20 hooklock multi-point locking system. However, I note
 21 a number of issues with the doorset, details of which
 22 are highlighted in the attached document. Of particular
 23 concern is the glazing and the locking mechanism. The
 24 inner glazing appears to be Pilkington Georgian wired
 25 safety glass (possibly toughened), but I cannot tell

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1 whether the outer panel is laminated. Can you get
 2 confirmation of the glass specification, depending on
 3 which, I might need to add additional security to the
 4 glass?
 5 "According to Gloria, Alba's sister, there is
 6 a problem with the locking system which is causing the
 7 upper hook to catch on the lock housing. I noticed that
 8 it was not sitting centrally within the lock. I assume
 9 a new door—closer will be fitted.
 10 "To add security to the door, my view would be to
 11 add a fireproof letterbag. Can you find out the answers
 12 to my queries, so I can finalise my specification?"
 13 If you go to page 1 {CST00002919/1}, you can see
 14 that Adrian Bowman forwards this to you, and we can see
 15 your full response. This is 22 July 2015. It says:
 16 "Adrian
 17 "The 1st attachment is the Masterdor information
 18 sheet as you can see the doors are 'Police Preferred
 19 Specification, Secured By Design'.
 20 "From the photo you have attached this door will be
 21 code SG34, a self closing 30 minute fire rated door,
 22 with the glazing also 30 minute fire rated, this door
 23 would have [been] signed off by LHC on installation.
 24 Please see the 2nd attachment for the door type and the
 25 3rd attachment as an example of the independent

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1 inspector checking each installed door. I do not have
 2 the document for 45 Grenfell Tower, this attachment is
 3 for some other flat doors in Grenfell Tower.
 4 "According to the photos and the police officer the
 5 door is now damaged, do you want me to look at this flat
 6 entrance door next time I am in the area?
 7 "I am also concerned that the occupants 'have put
 8 additional locks on the door' this was a fire rated
 9 door, it now might not be because the occupants have
 10 undertaken work on the door, also who removed the self
 11 closing device? The door is now not a compliant door as
 12 the self closing device is missing.
 13 "Additional features cannot just be added to this
 14 flat entrance door, a fire proof letter bag, any work
 15 must be undertaken by a competent contractor as this is
 16 a composite factory manufactured and assembled door set
 17 which comes as a complete unit, ie door and frame."
 18 So you were aware by this point, Mr Stokes, that the
 19 front door to flat 45 was damaged and had a missing
 20 self—closer and also additional locks; yes?
 21 A. Yes.
 22 Q. Yes, and in your view, from what we can see from this
 23 email, it was no longer compliant.
 24 A. Correct.
 25 Q. Yes.

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1 Now, moving forward in the chronology, on Monday,
 2 27 July 2015, five days later, we know that you visited
 3 the flat to inspect the door.
 4 Let's look at {CST00000932}.
 5 This is a letter of advice to Janice Wray on
 6 28 July, and you say:
 7 "Flat 45 Grenfell Tower ...
 8 "Subject: The flat entrance door.
 9 "Dear Janice
 10 "I looked at this flat entrance door yesterday,
 11 Monday the 27th July, the occupant allowed me to
 12 inspect this flat entrance door from both sides of the
 13 door, please see the photograph of this flat entrance
 14 door below.
 15 "This is one of the certified fire rated doors
 16 fitted by 'Masterdor' as part of the flat entrance door
 17 replacement programme, the glazing in the doors fan
 18 light area is Georgian wired fire rated glazing on the
 19 inner face.
 20 "When I inspected this door yesterday the door lock
 21 is slightly out of alignment, it appears that when
 22 whoever attempted to force open this door that some
 23 slight damage has occurred. I noted that the concealed
 24 self closing device is missing from this door, two
 25 additional bolts have been fitted to the rear of the

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1 door and the inner part of the letter box is missing.
 2 Please see the relevant photographs below. There is no
 3 damage to the doors surface and no holes etc in the
 4 doors face/surface."
 5 You attach a photograph. That's at page 4 of this
 6 document {CST00000932/4}. Can we just look at that.
 7 Yes, there it is.
 8 Could you just describe for the Chairman and panel,
 9 please, what we're looking at?
 10 A. A concealed self—closing device.
 11 Q. Right.
 12 Then if we go back to the letter on page 1
 13 {CST00000932/1}, last paragraph, we can see your
 14 conclusion. You say:
 15 "I believe that this door is still fully functional
 16 as a fire rated door, but adjustments should be made to
 17 the door so that the lock aligns correctly and a new
 18 inner part of the letter box should be fitted or the
 19 letter box replaced. The police officers report
 20 indicates that they recommend that a fire rated letter
 21 bag is fitted on the inner face of the door. This could
 22 be fitted at the same time as or in replace of the
 23 existing letter box. I would recommend that the door
 24 manufactures are consulted regarding the fitting of any
 25 items of additional door furniture to this certified

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1 fire rated door. This is in case any work undertaken on
2 or to the door by non qualified persons or additional
3 features fixed to the door invalidates any fire rated
4 certification of the door."

5 Now, you note here that the self-closing device was
6 missing, and we've seen the photograph.

7 If the door did not have a self-closing device, why
8 did you conclude that the door was a fully functional
9 fire-rated door?

10 A. Is there not anything else, after this, that says fix
11 the self-closing device?

12 Q. We can scroll down to page 2 {CST00000932/2}. I think
13 I've read you all the letter, actually. We can look at
14 page 2 just to see what is not there. It just ends:

15 "Please feel free to contact me if you require any
16 further assistance.

17 "Yours Faithfully

18 "Carl Stokes."

19 And you can see the first of the photographs
20 underneath it.

21 So, question again: given that the door was lacking
22 a self-closing device, why did you conclude that the
23 door was a fully functional fire-rated door?

24 A. Because the -- I'm going -- I can't answer that question
25 inasmuch as that -- I can answer the question inasmuch

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1 as the door is not damaged, but I would have had that
2 conversation that the self-closer should have been
3 re-fitted back. That might have been a telephone call
4 or I might have been told that the self-closer was
5 already in process of being re-fitted back.

6 Q. Well, it wasn't fully functional as a fire-rated door,
7 was it?

8 A. But if I'd already been told that it was in hand to have
9 a self-closer re-fitted to it ...

10 Q. Mr Stokes --

11 A. I can't answer the question that you're asking me. All
12 I can say is I would not have not said (sic), "Don't fit
13 a self-closing device". Did I have additional
14 information that said it was already in hand to repair
15 the self-closing device, but I haven't put that in the
16 letter? I would not have left it the way it is.

17 Q. Just looking at your words in the first sentence of your
18 conclusion, where you say "This door is still fully
19 functional as a fire rated door". Now, at that time, it
20 didn't have a self-closer on it, so it wasn't fully
21 functional as a fire-rated door, was it?

22 A. Correct.

23 Q. And therefore your advice is incorrect.

24 A. My advice in here is correct, but I do not -- looking
25 back now, from however many years ago, was there

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1 a self-closing -- I would not have not said (sic), "Do
2 not fit a self-closing device". I note that concealed
3 self-closing device is missing on the door. Conclusion:
4 the door is still fully functional, but I might have
5 told already that there was in hand a repair to be --
6 the door to be fitted with a self-closing device.

7 Q. We don't see that qualification on the face of the
8 letter.

9 A. We don't, no.

10 Q. Therefore, on its face, the advice is incorrect, isn't
11 it?

12 A. Looking at that letter, but without the additional
13 information or context, I can't think back this long
14 ago.

15 Q. Let's look a bit later on in the year, December 2015.

16 Can we go to {TMO00859693}, please. This is
17 an email, if we go down the screen to the bottom there,
18 from Janice Wray to Siobhan Rumble on 17 December 2015,
19 and she says this:

20 "Our fire risk assessor has raised his concern that
21 in conversation with a few of the tenants at
22 Grenfell Tower they have advised that Seamus had
23 disconnected the self-closers on their flat entrance
24 door -- in at least one of these cases this was said to
25 be due to the tenant perpetually locking himself out of

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1 his flat. It is imperative that these fire doors are
2 self-closing so I would be grateful if you could please
3 impress this upon Seamus and insist that he refrains
4 from disconnecting or removing any other self-closing
5 devices.

6 "Any queries please advise.

7 "Thanks

8 "Janice."

9 Just to complete the run, if you go to the top,
10 please, of page 1 of this email string, you will see
11 that Siobhan Rumble comes back to Janice Wray a few days
12 later on 21 December 2015 and says, "Told him".

13 Now, it looks from the email we've just looked at
14 from Janice Wray to Siobhan Rumble that you, as the fire
15 risk assessor, were the person who had raised the
16 concern about Seamus disconnecting self-closing doors;
17 is that right?

18 A. Correct.

19 Q. Can we take it, then, that at this point or by this
20 point in time, mid-December 2015, you were aware that
21 Seamus Dunlea was disconnecting or removing self-closing
22 devices for some of the Grenfell Tower tenants' front
23 doors?

24 A. That's what it looks like, yes.

25 Q. Yes. And it's quite clear, isn't it, I think, that

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1 Janice Wray says that you were told about the
2 disconnected self-closing devices during conversations
3 that you had had with a few of the tenants in the
4 building?
5 A. Correct.
6 Q. Do you remember how many people you spoke to?
7 A. No.
8 Q. I don't imagine you remember who you spoke to?
9 A. No.
10 Q. No. Do you remember how many flats were affected
11 roughly?
12 A. No.
13 Q. Did you take down any flat numbers?
14 A. It depends where the conversation — because I would —
15 this is not at a time of an FRA, so I would have been
16 there for some other reason.
17 Q. Well, that's another question: why might you have been
18 there?
19 A. I would only have gone there if I'd been instructed to
20 go there for some other reason.
21 Q. Do you remember what that was?
22 A. No.
23 Q. Nonetheless, do you remember why you didn't take the
24 flat numbers down, given that a few of the tenants had
25 told you that Seamus had disconnected their self-closing

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1 devices?
2 A. I can't answer that as an honest answer, but if the
3 conversation was, "My flat entrance door has been
4 disconnected", "What's your flat name? What's your
5 number?", "Oh, look, I just want to tell you that it's
6 been disconnected", as soon as I found out, I informed
7 Janice Wray immediately to get the situation resolved
8 because you cannot not have the self-closing devices
9 fitted.
10 Q. Are you able to shed any light on the circumstances
11 which gave rise you to alerting Janice Wray to the
12 concern as she's expressed here?
13 A. Well, I'm looking at the date here, just before
14 Christmas in 2015. Was I there for some other reason
15 that Janice had asked me to go there for, or TMO had
16 asked me to go there for, and this was just a side
17 product or side issue that was raised to me at the time
18 and I dealt with it immediately that I knew about it?
19 Q. Now, Seamus Dunlea has provided a witness statement to
20 the police. Let's look at that, it's at {MET00019959}.
21 There it is, it's a statement he gave to the police on
22 6 July 2018.
23 Can we go to page 6 {MET00019959/6}, third
24 paragraph. On that page, in the third paragraph, he
25 says:

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1 "Just after the warranty ran out, the doors started
2 going wrong. They had internal door closers that were
3 pulling out from the door because they had tiny little
4 screws holding them in and they had a massive fat spring
5 inside.
6 "The door had a hole drilled into it, had an
7 enclosed spring that went into the door and would have
8 a chain which attached to the frame. The springs were
9 quite big and the screws that were holding them in were
10 too small. Some of the screws were pulling out of the
11 door and some were pulling out of the frame. If it's
12 coming out of the frame or the door, the chain goes
13 round, you can't shut the door. You can't re-attach it
14 because of the fixings, so I would have no alternative
15 but to remove it. I think I did this to about ten
16 doors.
17 "One of the door closers that I took off ..."
18 I will come on to that in a moment.
19 Just pausing there, did you ever meet Seamus Dunlea?
20 A. I must have done.
21 Q. Right. Before December 2015, did he ever tell you about
22 these problems with these self-closing devices, do you
23 remember?
24 A. No. I wouldn't have thought he would have told me.
25 Q. Right. So your information about these self-closers

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1 came not from him, you think, possibly, but from the
2 tenants?
3 A. Yes. Well, I think that's what it says in my letter,
4 from the tenants.
5 Q. Were you aware that, as Seamus Dunlea has said here in
6 his statement, he thinks he removed the self-closing
7 devices from about ten flat doors?
8 A. Only from my letter to Janice Wray, which is the tenants
9 that told me. I would not know the numbers.
10 Q. Do you know if Siobhan Rumble did actually tell
11 Seamus Dunlea to stop disconnecting or removing them?
12 A. I would have no idea.
13 Q. Do you know what steps Janice Wray or anybody else at
14 the TMO did take or were going to take to reinstate the
15 self-closing devices on the doors where Seamus Dunlea
16 had removed them?
17 A. No, but I made it quite plain in my letter that they
18 must have them fitted, so I would like to think that
19 they would have undertaken repairs.
20 Q. Having been told what you were told by the tenants, as
21 reflected in Janice Wray's email to Siobhan Rumble, did
22 you follow up on that to make sure that the cure, the
23 remedy, had taken place?
24 A. I would have taken it on Janice's word that they had
25 been rectified, and on my next FRA I would have gone

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1 round the building and checked doors.
 2 Q. Right. Because the advice to Seamus Dunlea seems to
 3 have been that he should stop removing them; did you
 4 ever get any information that they had also been
 5 repaired, rectified?
 6 A. No.
 7 Q. No one told you that? Right.
 8 Can we then look at the 2016 FRA, 26 April 2016.
 9 {CST00003161/8}, please.
 10 This is the FRA, and under "Any other relevant
 11 information on this premises" towards the top of your
 12 screen, it says:
 13 "The TMO tenanted flats in this building ..."
 14 SIR MARTIN MOORE-BICK: Sorry, Mr Millett, I think we've got
 15 the wrong bit.
 16 MR MILLETT: Right. In fact, it appears twice. We want the
 17 first one. It says:
 18 "The TMO tenanted flats in this building have been
 19 fitted with new flat entrance door sets as part of
 20 a larger door replacement programme undertaken by the
 21 TMO. These new door sets for the tenanted flats have
 22 30 minute certified fire rated self closing doors which
 23 meet the requirements of the Building Regulations."
 24 That's the same information that you had previously
 25 included within section 12 of your 2012 and 2014 FRAs

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1 for Grenfell Tower, isn't it?
 2 A. It looks similar, yes.
 3 Q. Yes. Do you know why that information was in a separate
 4 or additional section?
 5 A. No, it might have been that — because more and more —
 6 sorry, what date was this, please?
 7 Q. This was April 2016.
 8 A. So as more — I've taken it out of section 12, put it
 9 into this, because it's now applicable to virtually all
 10 the buildings that had the door replacement programme,
 11 so it was in the same place in all of them.
 12 Q. This information was now four or five years old, wasn't
 13 it?
 14 A. Yes.
 15 Q. Why were you still describing the doors as new, new flat
 16 entrance doors?
 17 A. Rather than the old original ones.
 18 Q. They weren't new, were they, they were now four or
 19 five years old?
 20 A. I live near Oxford. New College in Oxford was built in
 21 16—something.
 22 SIR MARTIN MOORE-BICK: 13—something, I think.
 23 A. Sorry, sir, yeah.
 24 MR MILLETT: Whatever. The fact is those flat entrance
 25 doors were not newly fitted but had been in place for

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1 some years.
 2 The importance of that — it's not a trivial point,
 3 Mr Stokes — the reason I'm asking you that is because
 4 this is essentially cut and pasted from earlier FRAs,
 5 but the doors have got older and older and therefore
 6 more and more liable to damage or replacement of the
 7 door—closers.
 8 A. It says, "The ... tenanted flats in this building have
 9 been fitted with new", so they were new to those flats
 10 and they were new doors, to make a difference between
 11 the old doors, which were the original doors.
 12 Q. Now, if we go to page 20 {CST00003161/20}, we can see in
 13 section 12, which starts on page 19 — we don't need to
 14 go back to it — you have ticked "Yes" in both the box
 15 about dwelling entrance doors and the box about
 16 self—closing devices, haven't you?
 17 A. Which question, please?
 18 Q. In the middle of the column:
 19 "Do the dwelling entrance doors appear to be fire
 20 rated?"
 21 Tick, "Yes".
 22 A. Yes.
 23 Q. Then two below that:
 24 "Where appropriate are any fire doors fitted with
 25 self closing devices and do these function correctly?"

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1 Tick, "Yes".
 2 A. Correct.
 3 Q. If we turn to page 21 {CST00003161/21}, means of escape,
 4 third paragraph down, it says:
 5 "The tenanted apartments ..."
 6 Do you see that, just five lines down?
 7 A. Yes.
 8 Q. "The tenanted apartments within this building had a few
 9 years ago their flat entrance doors replace with new
 10 door sets. These door sets are self closing 30 minute
 11 certified fire rated doors which meet the requirements
 12 of the Building Regulations, if there is glazing in the
 13 new doors is fire rated. The letter box on these new
 14 doors is fire rated and cold smoke seals are fitted as
 15 standard, there is a level threshold for compliance with
 16 Part M of the Building Regulations. A key is not needed
 17 to open these new flat entrance doors from the internal
 18 face of the door again complying with Building
 19 Regulation requirements. Information on these new doors
 20 which also have acoustic, safety and security properties
 21 (PAS 23 and 24) as well as fire along with the fire
 22 certification documentation is held at the Hub in the
 23 TMO offices."
 24 Now, here you have referred to them as being
 25 replaced a few years ago, but otherwise am I right in

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1 thinking that this paragraph is identical or
 2 substantially similar, at least, to the ones we've seen
 3 before in earlier FRAs?
 4 A. Correct.
 5 Q. Again, there is no suggestion here of individual sample
 6 checks that you have done on any of the flats, is there?
 7 A. No.
 8 Q. Do you recall whether on your visit for the April 2016
 9 FRA you managed to get access to any flats to look at
 10 any self-closers or any other aspect of the door?
 11 A. I'm going to say I would have done because it was
 12 standard that I would have tried at least and got access
 13 to a few.
 14 Q. Right.
 15 A. There was — the newer — I believe the standard
 16 required, or the standards of the time this was written,
 17 you didn't have to note it down. I believe the new
 18 PAS 79 actually does say you should note down which
 19 doors and how many.
 20 Q. At this time, this is April 2016, it's only a few months
 21 after the December 2015 exchange that you had had about
 22 Seamus Dunlea removing some of the door-closers in
 23 Grenfell Tower. Did you make any effort at this point
 24 when preparing this FRA to discover which flats had had
 25 their door-closers removed by Seamus Dunlea to make sure

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1 that they had new door-closers on them?
 2 A. Not individual flats, but I would have asked the
 3 question because it would have been a question that
 4 would have come up.
 5 Q. Well, we've seen nothing in this FRA about that.
 6 A. Correct.
 7 Q. Why is that?
 8 A. It's not written down.
 9 Q. Well, I know it's not written down, but that's why I'm
 10 asking you. Why is it not written down?
 11 When I say it, let me be clearer: why have you not
 12 recorded the fact in this FRA that a number of
 13 self-closing devices on flat front doors in
 14 Grenfell Tower had been removed by the TMO?
 15 A. I can't answer that question. As I walked round the
 16 building, I found none that were missing. It's
 17 a snapshot — my snapshot in time of what I found on the
 18 day.
 19 Q. Why did you not go round the building trying, so far as
 20 you could, to check the flats which had self-closing
 21 devices which Seamus Dunlea had removed?
 22 A. I wouldn't have known which flats they were.
 23 Q. Well, why did you not make all attempts to find out
 24 which they were by asking the TMO?
 25 A. That — I reported it back to the TMO, and as far as

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1 I was concerned, it was an internal house — something
 2 for the TMO to fix thereon in with their maintenance
 3 department. Unless I was given information to the
 4 contrary, I would expect that work to have been
 5 undertaken.
 6 Q. So you worked on the assumption. But you were on
 7 notice, weren't you, that there were a number of flat
 8 front doors which had had the self-closing devices
 9 removed by the TMO's own operative? Given that you were
 10 on notice of that, why didn't you take the opportunity
 11 only a few months later to check to make sure, as far as
 12 you could, that those self-closing devices had been
 13 replaced?
 14 A. But if I asked the question, I would have — that was
 15 what I was doing: have they been replaced? If I asked
 16 the question, I am taking it on good advice the answer
 17 I'm given back.
 18 Q. We see no record of you writing to Janice Wray or
 19 Siobhan Rumble or anybody at the TMO saying, "I was
 20 concerned that there had been a number of self-closing
 21 devices removed, can you please now assure me that they
 22 have all now been replaced". We've seen no record of
 23 that. Why is that?
 24 A. I recorded that I had concerns when I found out they'd
 25 been removed. I then passed the issue back to the TMO

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1 to resolve that situation.
 2 Q. And you just assumed without checking that they'd
 3 resolved it; is that right?
 4 A. It's the same as in my significant findings. If there
 5 was a door-closer missing on a staircase, and the
 6 next — four years later when I went, it was repaired,
 7 I have assumed that it's fixed in the meantime.
 8 Q. Yes, but this isn't four years, this is three months,
 9 four months at best.
 10 A. Okay. The same applies.
 11 Q. Right. So you just left it to them and, unless you were
 12 told otherwise, you assumed everything had been fixed?
 13 A. Yes.
 14 Q. Was that not a dangerous assumption to proceed on for
 15 a fire risk assessor who is on notice that the absence
 16 of these absolutely critical pieces of equipment are
 17 missing?
 18 A. It is ... it is an assumption that I have made.
 19 Q. It's a dangerous assumption, that's what I'm putting to
 20 you.
 21 A. It's no more dangerous than I check it and two days
 22 after I check it, it fails. I've got to rely on the
 23 TMO, when I provide them with information, that they act
 24 on that information.
 25 Q. Now, if we go to the same set of text, about

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1 three—fifths of the way down your screen, it says:
 2 "The original flat entrance doors in this
 3 building ..."
 4 Do you see?
 5 A. Yes.
 6 Q. If we can scroll just a little bit up, we can see more
 7 of the text. It says:
 8 "The original flat entrance doors in this building
 9 are flat numbers 56, 61, 86, 92, 105 ..."
 10 Running down to 206. Do you see that?
 11 A. Yes.
 12 Q. It goes on to say:
 13 "It is TMO's policy that if flats are refurbished or
 14 when new tenants move into that flat then the
 15 self closing device fitted to the flat entrance door is
 16 accessed[sic]. If the self—closing device does not
 17 close the door fully or one is not fitted to the door
 18 then a new appropriate self closing device is fitted.
 19 Some of the original flat entrance doors have more than
 20 one lock fitted to them, it is assumed that the
 21 occupants of these flats can exit the flat in
 22 an emergency without any undue delay."
 23 Can you explain, what do you mean, the policy "if
 24 flats are refurbished or when new tenants move into
 25 a flat then the self closing device ... is accessed"?

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1 What do you mean by that?
 2 A. It is part of the refurbishment of the flat that makes
 3 certain that the flat — the self—closing device works
 4 correctly on the door.
 5 Q. Right.
 6 A. Probably "access" is probably the wrong word to use, but
 7 in here the policy, refurbished or new tenants moved in,
 8 it means someone actually goes and checks the flat
 9 entrance door self—closing device works correctly.
 10 Q. Did you mean "assessed" rather than "accessed"?
 11 A. Assessed, yeah.
 12 Q. Oh, I see.
 13 A. Apologies.
 14 Q. Right, it's a typo. That's all right, that's clear.
 15 Did that policy apply, did you think, to the 16
 16 original flat entrance doors which you have listed in
 17 that paragraph?
 18 A. I'm going to say no because those 16 are leaseholder
 19 doors.
 20 Q. So your understanding of the policy that you've set out
 21 there didn't apply to leaseholders' doors?
 22 A. So the TMO's policy is they refurbished, so that would
 23 only be under tenanted control, new tenants would move
 24 in, tenanted control. If they're leaseholders, they
 25 can't change their door without going to the TMO anyway,

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1 and Building Regulations, because it's a Building
 2 Regulations requirement.
 3 Q. Right. Are you saying here that these 16 flats haven't
 4 been assessed to make sure that they've got working
 5 door—closers?
 6 A. These were the original ones, and I would have checked
 7 them initially, or a sample initially, and my assumption
 8 is they still should have them in working order, but
 9 because they're leaseholders, it's hard for the TMO to
 10 actually access them.
 11 Q. What I'm trying to do is work out the connection between
 12 the first sentence which lists the 16 flats, and the
 13 second sentence which refers to the TMO policy which
 14 seems to apply to tenants.
 15 A. No, sorry, it's a full stop. It could have been on the
 16 next line, I think.
 17 Q. And the original flat entrance doors are all
 18 leaseholders. What are we supposed to read into that
 19 about whether or not they do have self—closing devices?
 20 A. I think it's elsewhere in the document the ... I think
 21 it's just a statement of fact, that was a sentence with
 22 those — these are the original doors.
 23 Q. Right, okay.
 24 When you talk of the policy, the TMO's policy, that
 25 if flats are refurbished or when new tenants move into

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1 a flat, then the self—closing device fitted to the flat
 2 entrance door is assessed, are you referring to
 3 a written policy?
 4 A. Over the time — yes, that was the written policy that
 5 was going through at that time.
 6 Q. It was going through at that time; had it been
 7 formalised and finalised?
 8 A. I can't say internally whether it had been finalised.
 9 That's the information I was given, that the policy was
 10 to be adopted or was being adopted.
 11 Q. Right. You say, "That was the information I was given";
 12 were you given a document?
 13 A. I think this was discussed on more than one occasion on
 14 how was the best way to —
 15 Q. I see.
 16 A. — access doors, make certain self—closers were there,
 17 do inspections of doors, what was the programme
 18 et cetera, et cetera.
 19 Q. Can you explain why this policy only makes its first
 20 appearance in this 26 April 2016 FRA?
 21 A. Because this was ongoing, so this policy would have been
 22 new.
 23 Q. Right, I was going to say, it's something that's
 24 recently been agreed or at least understood by you; is
 25 that right?

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1 A. Correct.
 2 Q. Was it something on which you had provided advice to
 3 Janice Wray?
 4 A. I'm going to say yes.
 5 Q. You're going to say yes; do you remember or not?
 6 A. Yes. I mean, she would have asked me and I would have
 7 provided some information.
 8 Q. Right.
 9 Do you remember whether the LFB had any input into
 10 that policy, from the best of your recollection?
 11 A. I'm going to say yes, because I know it was an agenda
 12 item on her meetings with the LFB on more than one
 13 occasion, and also it was — a meeting was had with the
 14 LFB including legal from RBKC/TMO about leaseholder
 15 doors, et cetera, et cetera, and self-closers on doors.
 16 MR MILLETT: Right.
 17 Mr Chairman, it's 1 o'clock, I'm mid-topic, really,
 18 but we're going to go to a different —
 19 SIR MARTIN MOORE-BICK: Sounds like the topic might take a
 20 little while to complete; is that right?
 21 MR MILLETT: Yes. We're going to another document.
 22 SIR MARTIN MOORE-BICK: I think possibly we should break at
 23 that point.
 24 MR MILLETT: I think we should.
 25 SIR MARTIN MOORE-BICK: Right, Mr Stokes, we're going to

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1 break at that point so we can all get some lunch.
 2 We will resume, please, at 2 o'clock. Again, I have
 3 to ask you not to talk to anyone about your evidence or
 4 anything relating to it over the break. All right?
 5 THE WITNESS: Okay, sir.
 6 SIR MARTIN MOORE-BICK: Thank you very much.
 7 THE WITNESS: Thank you, sir.
 8 SIR MARTIN MOORE-BICK: If you would like to go with the
 9 usher, please.
 10 (Pause)
 11 Thank you, 2 o'clock, then, please.
 12 (1.00 pm)
 13 (The short adjournment)
 14 (2.00 pm)
 15 SIR MARTIN MOORE-BICK: All right, Mr Stokes, are you ready
 16 to carry on?
 17 THE WITNESS: Sir.
 18 SIR MARTIN MOORE-BICK: Good, thank you very much.
 19 Yes, Mr Millett.
 20 MR MILLETT: Yes, Mr Chairman, thank you.
 21 Mr Stokes, flat entrance doors continued.
 22 Can we please now look at your April 2016
 23 significant findings schedule at {CST00003098}.
 24 If we go in that, please, to page 3 {CST00003098/3},
 25 as you see, we can see there that you have covered flat

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1 entrance doors under item 12.
 2 If we look at 12b and c on that page, and then over
 3 the page to d and e, you can see that you have covered
 4 those all as high-risk items.
 5 It's right, isn't it, that those all relate to doors
 6 other than flat entrance doors?
 7 A. Yes.
 8 Q. Yes. So, again, no recommendations relating to any flat
 9 entrance door, either by way of repair or replacement of
 10 a self-closer?
 11 A. Correct.
 12 Q. Yes. Now, your "for information" entry that we saw in
 13 white against the red background of all the others in
 14 the action plan for 2014 was not there. Why was that?
 15 A. Sorry, which one is this, please?
 16 Q. Do you remember we looked before the break at your 2014
 17 action plan which had the "for information" list of flat
 18 front doors?
 19 A. Yes.
 20 Q. That's disappeared in this significant findings
 21 schedule. Why was that, do you think?
 22 A. It was for information last time, it was a given now
 23 that the — any new doors should meet compliance with
 24 building regs as and when fitted.
 25 Q. During this inspection, do you remember checking on

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1 flat 45 to see if the adjustments that you had spoken
 2 about in your 28 July 2015 letter had been made?
 3 A. No recollection.
 4 Q. No. Why is that? Not why do you not recall it. We
 5 don't have a record that you checked. Why didn't you
 6 check, if the record is correct?
 7 A. Because I didn't.
 8 Q. Why is that?
 9 A. I would assume that it's gone back to Repairs Direct and
 10 the work will be undertaken.
 11 Q. I see. So this is back to the answers you've given
 12 before: you just assumed that the TMO would do their
 13 job?
 14 A. Yes.
 15 Q. Right.
 16 Wasn't it important to check that specific door,
 17 given that you had known that it had been proposed that
 18 there were going to be works done on it?
 19 A. I worked under the assumption that once an item went
 20 back to the TMO, the work would be undertaken by the TMO
 21 at the quickest and most opportune time that they could
 22 undertake the work.
 23 Q. Does that explain why you don't have a system of
 24 comparing your FRA items from one FRA to the next, you
 25 just assume they're going to be repaired or cured unless

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1 you're told otherwise?
 2 A. No. When I go out to do an FRA, I would take the
 3 previous FRA document with me.
 4 Q. Yes, exactly.
 5 A. And also I would undertake to, if I could, get the —
 6 I can't remember the software system that the TMO used,
 7 tried to get that document which it's inputted on so
 8 I could have a reference to when the work was
 9 undertaken.
 10 Q. Yes. But in order to get to the bottom of whether work
 11 which was outstanding from the previous FRA had been
 12 remedied, surely you would have had to have asked the
 13 TMO the question: have my actions to be taken been
 14 taken?
 15 A. But I would have asked by the — I'm trying to remember
 16 the system they used. My FRAs were inputted on their
 17 system, W9, W2?
 18 Q. W2.
 19 A. I would ask for a copy of that report from the FRAs.
 20 Q. Right, so you did check?
 21 A. Yes, I said I checked. I always took it with me and
 22 asked for their copy.
 23 Q. So just focusing on that answer, then, did you check
 24 flat 45 using W2 to make sure that the adjustments you
 25 had mentioned in your 28 July 2015 letter had been made?

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1 A. I wouldn't have thought it would be on W2 because that
 2 was for risk assessments, and if it would have been on
 3 W2 I would have had a copy to say that it was on there.
 4 Q. Does that tell us that when you were approached for
 5 ad hoc advice outside the scope of an FRA, although it
 6 might give rise to actions, you wouldn't have any means
 7 of checking whether they were followed up or not because
 8 they weren't on W2?
 9 A. Probably correct, yes.
 10 Q. Right. Did you ever draw that problem or feature to
 11 Janice Wray's attention and suggest to her that when you
 12 gave advice about outstanding matters such as
 13 a defective or missing door—closer in a particular flat,
 14 she needed to input that into W2 to make sure that it
 15 popped up so that you could review it and check it at
 16 your next FRA?
 17 A. Until you just raised that point, I didn't even think
 18 about it.
 19 SIR MARTIN MOORE—BICK: Mr Stokes, just help me with this.
 20 Once or twice in the course of your evidence you said
 21 that an FRA is a snapshot.
 22 A. Sir.
 23 SIR MARTIN MOORE—BICK: Would I be wrong to assume,
 24 therefore, that every time you did an FRA, in a sense,
 25 you looked again from scratch at all relevant aspects of

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1 the building and described what you saw on the snapshot?
 2 A. Correct.
 3 SIR MARTIN MOORE—BICK: And whether something had previously
 4 been repaired or not in a sense didn't matter; it either
 5 was defective, in which case if it was still defective,
 6 you would say it was defective, or if it wasn't
 7 defective, you wouldn't need to note it?
 8 A. Correct.
 9 SIR MARTIN MOORE—BICK: Was that your approach to it?
 10 A. Yes, sir, exactly.
 11 SIR MARTIN MOORE—BICK: All right, thank you.
 12 MR MILLETT: If that's right, Mr Stokes, what was the point
 13 of taking the previous FRA round with you?
 14 A. As an aide memoire.
 15 Q. Did you take the previous significant findings schedule
 16 round with you as well?
 17 A. So that is what I would take round with me, the
 18 significant findings, not the FRA, I apologise. So
 19 I would take the previous significant findings sheet
 20 with me when I went to the building.
 21 Q. Why?
 22 A. As an aide memoire.
 23 Q. An aide memoire for what?
 24 A. So I could see what was wrong last time. But the FRA
 25 was snapshot in time, as we've just described, but it is

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1 an aide memoire: this was what was wrong last time.
 2 Q. If you, as you just agreed with the Chairman, were
 3 simply interested in a snapshot and whether something
 4 had previously been repaired or not didn't matter, what
 5 was the point of taking round the last year's or last
 6 time's FRA or significant findings schedule?
 7 A. I don't think that's what was actually suggested,
 8 I think what we suggested was it was a snapshot. If it
 9 had been completed, it was now not defective. But it
 10 was an aide memoire to say, for argument's sake, 12e
 11 there, the door and frame at the base of the basement
 12 staircase is badly damaged, fit a new door, well, that's
 13 an aide memoire to me when I go round this time, that's
 14 an item I raised last time, has it been — look, is it
 15 a new door, has it been repaired/replaced?
 16 Q. That's rather what I thought you were saying. So
 17 although it's a snapshot, it's a snapshot informed by
 18 the previous knowledge from your last FRA and
 19 significant findings schedule?
 20 A. Correct.
 21 Q. So let's take your 12e as an example so I really, really
 22 understand it. You say "Action to be taken":
 23 "A new certified 30 minute self closing fire rated
 24 door set should be fitted in this location [that's the
 25 basement staircase]. Also any other damaged fire doors

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1 in the basement should be replaced or repaired."
 2 Let's assume that's in the last action plan. You
 3 take this, you have it in your hand, do you go and look
 4 at the basement staircase again and look at the door?
 5 A. Yes.
 6 Q. Do you look at it and find out whether your action, as
 7 I've just read out to you, has been carried out?
 8 A. Yes.
 9 Q. Can you always tell that from a visual inspection?
 10 A. Whether it's a new door fitted, yes.
 11 Q. What if you can't identify from a visual inspection the
 12 action to be taken?
 13 A. Well, in this particular case it's badly damaged, so if
 14 it's not badly damaged, you would know that it's a new
 15 door, you could see if it was a new door, and if it was
 16 still badly damaged, you know the action hasn't been
 17 undertaken.
 18 Q. That was your brilliance in identifying a particular
 19 example. Let's take a slightly more difficult one, 17a.
 20 You ask a question:
 21 "Where is the fire alarm panel(s) for these
 22 fire detection systems?"
 23 What would happen if you hadn't had an answer to
 24 that question next time round?
 25 A. Well, on W2 there would be an answer in whichever —

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1 that question would be put on to their system and then
 2 they would have an answer back. I would have a copy of
 3 that, I think I — and in that answer would be the
 4 answer to my question.
 5 Q. Yes. So do we take it from that that although it's
 6 a snapshot, in the sense that you can only see what you
 7 can see when you see it, and only know what you know
 8 when you know it, in fact you are making a comparison
 9 exercise between what you saw and knew last time and
 10 what you now see and know?
 11 A. As an addition, yes.
 12 Q. So you are checking up to the extent that you can, and
 13 obviously you can't do what you can't, to verify what
 14 actions were taken as a result of your last significant
 15 action plan?
 16 A. Agreed, and I would have information there to tell me
 17 what was undertaken as well.
 18 Q. Right. Given that fact, why do you make an exception
 19 for flat 45? Is it simply because it wasn't in the last
 20 FRA but was part of ad hoc advice?
 21 A. Yes.
 22 Q. Coming back to my point, doesn't that tell us that the
 23 system that was being operated between you and the TMO
 24 was defective to this extent: namely, that there were
 25 items which would have arisen as a result of ad hoc

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1 advice which would not have made it into the checking
 2 system you operated within the FRAs?
 3 A. Agreed. Again, it's not something I'd have thought of
 4 until you just raised it. I would assume that in the W2
 5 system would — this information would be inputted on
 6 there by Janice.
 7 Q. Can we look at the 20 June 2016 FRA, please,
 8 {CST00003145/8}, bottom of the page, where it says:
 9 "Any other relevant information on this premises."
 10 Again, it's the same standardised information you
 11 provided in all of the other FRAs, isn't it?
 12 A. The second other relevant information?
 13 Q. Correct, you're absolutely right, the second one.
 14 A. That would be different. This wouldn't have been in
 15 other —
 16 Q. No, in fact you've asked me a question and I've answered
 17 it wrongly. In fact, it's the first one, the TMO
 18 tenanted flats, that one.
 19 A. Yes.
 20 Q. Looking at section 12, then, on pages 20 to 22, if we
 21 can, page 20 {CST00003145/20}, starting with that, we
 22 can see that's where you see "Fire protection measures,
 23 means of escape", and then if you go to page 22
 24 {CST00003145/22}, halfway down, again we see the text:
 25 "The tenanted apartments ..."

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1 You see that?
 2 A. Yes.
 3 Q. That text there about the flat entrance doors is the
 4 same as we saw in the April 2016 FRA, isn't it?
 5 A. Yeah, yes.
 6 Q. Yes.
 7 Let's look at the significant findings schedule,
 8 {CST00003069/4}, items 12b on page 4 to 12j on page 5
 9 {CST00003069/5}. Just canter through those.
 10 Again, if you look on to page 5, the majority of
 11 those items relate to doors other than flat entrance
 12 doors, don't they?
 13 A. Yeah, 12h is a flat entrance door.
 14 Q. I was going to come to 12h in a moment, but the majority
 15 are?
 16 A. Yes.
 17 Q. Just to be clear, 12c and d on page 4 were communal
 18 doors, weren't they, but not flat entrance doors? Or is
 19 that actually wrong and some of them were flat entrance
 20 doors?
 21 (Pause)
 22 A. They were the lower floor levels.
 23 Q. Right.
 24 A. New doors.
 25 Q. Right.

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1 Now, can we go back to page 4 {CST00003069/4},
 2 please, and look at 12g. This says:
 3 "The flat entrance door of flat 24 is damaged with
 4 the letter box missing.
 5 "This door should be repaired and a new fire rated
 6 letter box fitted, alternatively a new self closing
 7 30 minute fire rated door fitted with intumescent strips
 8 and cold smoke seals could be installed."

9 Would you agree that the damaged letterbox could
 10 have been visible from an external inspection? You
 11 wouldn't need to look the other side of the door for
 12 that?
 13 A. The letterbox is missing, so that's from the outside,
 14 I could see that.
 15 Q. That's right.
 16 A. Yes.
 17 Q. Do you recall if you only did an external inspection of
 18 this flat entrance door or whether you did an internal
 19 inspection as well?
 20 A. I wouldn't know.
 21 Q. We have a photograph of the door, {CST0000103/3}.
 22 There it is. The picture is only of the outside of the
 23 door. It would seem from that that that was the extent
 24 of your inspection; is that correct?
 25 A. Looking at that, yes.

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1 Q. In your view, was this door no longer compliant with the
 2 Building Regulations because of that damage?
 3 A. Yes.
 4 Q. And therefore it posed a risk to residents in the event
 5 of a fire?
 6 A. Yes.
 7 Q. Yes.
 8 12h, if we go back to that at page 5
 9 {CST00003069/5}, very top of the page, you have rightly
 10 pointed it out already:
 11 "The flat entrance door of flat 112 is being
 12 replaced, this new door is not marked as a fire rated
 13 door and it does not have a self closing device fitted
 14 to it. Cold smoke seals are fitted."
 15 We can also see a picture of this door at
 16 {CST0000103/1-2}, there it is.
 17 It appears from the text that you weren't able to
 18 speak with the occupier when you inspected this door.
 19 Is that correct?
 20 A. From memory, there was a — someone fitting the door.
 21 Q. Right. How did you gain access to the flat? Was it
 22 because someone was working on it when you arrived?
 23 A. Yes, sir. The door was open, yes.
 24 Q. Exactly, and that's how you could tell the door had no
 25 self-closer; is that right?

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1 A. Yes.
 2 Q. I see.
 3 Given this door isn't marked as fire rated and it
 4 didn't have a self-closing device, and also given the
 5 damage, would you agree that it didn't comply with the
 6 Building Regulations for any one of those three reasons?
 7 A. Did you say the door is damaged?
 8 Q. Yes, you said it — yes, that's right, you said —
 9 A. This is a new door, sir.
 10 Q. You said that — well ...
 11 (Pause)
 12 Well, let's just take two of those, then, not marked
 13 as fire rated, didn't have a self-closing device; would
 14 you agree that, for those reasons, it was not compliant
 15 with the Building Regulations?
 16 A. Yes.
 17 Q. Yes. And therefore, again, it posed a risk to residents
 18 in the event of a fire?
 19 A. Yes.
 20 Q. Do you recall gaining access to any other flats during
 21 this inspection?
 22 A. Not unless I've written it down, no.
 23 Q. So apart from those two doors that you flagged, is the
 24 position, again, that the FRA done in June 2016 and the
 25 significant findings schedule identified no issues with

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1 any of the flat entrance doors based on your inspection
 2 of the building?
 3 A. Of doors I could access, yes.
 4 Q. Yes.
 5 Now, moving on in time in 2016, after your last FRA
 6 for Grenfell Tower, do you remember that in October 2016
 7 you wrote a letter to Janice Wray following a visit that
 8 you had made to the tower on 18 October? Do you
 9 remember that? No?
 10 A. Pre-fire service visit?
 11 Q. Yes.
 12 A. Yes, sir.
 13 Q. Let's look at {CST00003137}.
 14 This is a letter dated 19 October to Janice Wray,
 15 subject "Grenfell Tower":
 16 "Dear Janice,
 17 "Thank you for asking me to inspect this building
 18 before an audit of the premises is undertaken by the
 19 London Fire Brigade under The [RRO] next week.
 20 I visited the building yesterday and as a result of my
 21 visit I would recommend that the following items are
 22 addressed or information obtained to assist the London
 23 Fire Brigade Inspecting Officer.
 24 "The last Fire Risk Assessment (FRA) undertaken by
 25 myself of this premises was on the 20th June 2016, the

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1 following are items from the significant findings sheets
 2 from that FRA are still outstanding according to the
 3 excel spread sheet/W2 information you have sent me."
 4 Just pausing there, is that an illustration or
 5 confirmation of what you were saying earlier, that you
 6 would be able to check the progress of significant
 7 findings against the Excel spreadsheet or W2 that
 8 Janice Wray would send?
 9 A. Yes.
 10 Q. Did you ask her to send those to you periodically or did
 11 she send them whenever she felt the urge?
 12 A. This — I believe at this stage, it was — we'd had
 13 an understanding when I went to undertake a fire risk
 14 assessment, I would automatically get one.
 15 Q. I see. You say at this stage; when did that
 16 understanding start?
 17 A. It progressed over the time.
 18 Q. Right.
 19 A. You know, as I would go back to buildings, I would
 20 ask — right at the beginning I would ask for
 21 certification on systems, then it progressed, after
 22 a very long time, I managed to get access to the system,
 23 and then again, ongoing, as I wanted information, rather
 24 than ask for it, I was being given it.
 25 Q. So I think we can take this quite quickly, given your

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1 previous evidence.
 2 It's right that on this letter you were looking to
 3 see what actions were still outstanding —
 4 A. Correct.
 5 Q. — ahead of the LFB's audit?
 6 A. Correct.
 7 Q. Just to be clear, you have exhibited or attached details
 8 of the significant findings from your 20 June 2016 FRA
 9 and significant findings schedule.
 10 A. Yes.
 11 Q. Yes, and your advice on what should be done that you
 12 wrote into your significant findings schedule.
 13 A. Yes.
 14 Q. Yes, and also the comment on individual items based on
 15 your visit.
 16 A. Yes.
 17 Q. If you turn to the end of the letter at page 12
 18 {CST00003137/12}, please, you can see there are
 19 additional items, "My comments". We saw this yesterday.
 20 Additional item 1 we saw, which was the mobility
 21 scooter, you remember that one?
 22 A. Yes.
 23 Q. There are some others as well. Item 2 is the dry rising
 24 main outlet is obstructed by a shopping trolley, these
 25 items should be removed.

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1 Then page 13 {CST00003137/13}, there is an item of
 2 furniture outside flat 133. Do you see that?
 3 A. Yes.
 4 Q. Which should also be removed. 4, cardboard boxes in the
 5 refuse chute room, and 5, the dry rising outlet box
 6 located by flat 2 does not have a sign on it. So those
 7 were extras.
 8 You obviously undertook a fresh inspection of the
 9 building in order to highlight any other issues that
 10 might be picked up on by the LFB on their audit.
 11 A. So this is my observations as I went round the building.
 12 Q. Did that include a sample check of flat entrance doors,
 13 inside and out where you could, on that occasion?
 14 A. It would have done, yes.
 15 Q. I see. It would have done.
 16 Do you remember on that occasion gaining access to
 17 any flats in order to look at the door—closers?
 18 A. I can't remember.
 19 Q. Right. But you say you would have done?
 20 A. If I had access, yes.
 21 Q. Is it right you were treating this as if it were another
 22 tour that you would have performed ordinarily as if you
 23 were doing an FRA?
 24 A. Similar in structure, yes.
 25 Q. Right. Was part of the exercise to go round with your

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1 significant actions schedule from June and tick off
 2 where you could those matters that were outstanding so
 3 that the LFB didn't pick up on them when they came round
 4 on their audit?
 5 A. No, this is to help the LFB, so this was — it was — by
 6 this stage the LFB would give the TMO a building that
 7 they were going to audit. At short notice I would be
 8 asked could I just go to these buildings, go round
 9 immediately, have a look, and is there anything that
 10 Janice should know, has work been undertaken to help
 11 with the LFB and the TMO undertake the work.
 12 Q. Right.
 13 Now, let's just focus, then, on the list of issues
 14 that you identified. Could we go back in the letter,
 15 please, to the foot of page 1 {CST00003137/1}, and then
 16 see the heading there:
 17 "Items from the buildings last FRA.
 18 "No Item Number High.
 19 "Identified risk or hazard."
 20 Then if you turn to page 2 {CST00003137/2}, you can
 21 see the list starts "1a. High", and continues in that
 22 vein down through 2, 1b, and then on to page 3
 23 {CST00003137/3}, item 4, identified risk or hazard,
 24 actions to be taken, comments.
 25 It progresses through some of the items in your

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1 significant items schedule from June 2016, doesn't it?
 2 A. Yes.
 3 Q. So it looks as if what you're doing here — is this
 4 right? — is going round the building with that
 5 significant findings schedule in your hand, picking up
 6 which of those outstanding items have not yet been
 7 closed out?
 8 A. Correct.
 9 Q. And then commenting on the risk level?
 10 A. Correct.
 11 Q. Right.
 12 A. Well, no, the risk level is the risk level from the FRA,
 13 so —
 14 Q. You're right.
 15 A. — it's literally a cut and paste.
 16 Q. Reading across.
 17 A. Yes.
 18 Q. Now, at page 5 {CST00003137/5} we can see items 12g and
 19 h. These are the flat entrance doors of flat 24 and
 20 flat 112. It looks as if you've essentially repeated
 21 the outstanding items there and say underneath it, under
 22 your comments, "Still outstanding"; yes?
 23 A. Yes.
 24 Q. Now, this was obviously three months or so on. Did it
 25 not concern you that although you had identified

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1 self—closing doors or damage to these doors,
 2 non—compliance with the Building Regulations in respect
 3 of these doors, in June, even by October, the actions
 4 you had recommended were still outstanding?
 5 A. Because it ... yes.
 6 Q. Was that not a concern to you?
 7 A. Of course it was a concern, hence why the letter back.
 8 Q. Yes. Did you say anything specific to Janice Wray or
 9 ask her, "Why are these items still outstanding,
 10 I flagged these up months ago?"
 11 A. Sometimes that was an ongoing conversation.
 12 Q. Right.
 13 There are, in my count, 23 items from your
 14 significant findings schedule which you have identified
 15 as still outstanding in this letter.
 16 If we go back to the significant findings schedule
 17 for June 2016 at {CST00003069}, just do that and run
 18 down it. We could do the same exercise on this letter
 19 but it's visually more impressive if we look at the
 20 significant findings schedule.
 21 If we scroll down from page 5 and go to page 6, you
 22 can see that they're all red.
 23 A. Yes.
 24 Q. In fact, I think it's right that all those in that
 25 schedule are red, aren't they?

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1 A. Yes.
 2 Q. There are no ambers or greens.
 3 A. Without looking at it, I'm going to say yes, because —
 4 Q. Yes.
 5 A. Yes.
 6 Q. Well, don't guess. Let's start at the top, let's go to
 7 page 1. We've started on page 5, but if we just go to
 8 page 1, then go to page 2, ignoring the item for 3,
 9 which is the fireman override switch and no actions are
 10 required. Go to page 3, page 4, page 5, page 6, page 7.
 11 They're all red, aren't they?
 12 A. Apart from one, yes.
 13 Q. Apart from the white one where no action was required,
 14 and we can go on to the end of the document.
 15 That meant, didn't it, that the action should be
 16 completed within two to three weeks, or at least the
 17 work started within two to three weeks?
 18 A. Started, yes.
 19 Q. Would you accept from me that excluding the two that are
 20 for information only — there are actually two there —
 21 there are or were 43 highlighted actions marked in red
 22 as high priority where the work should have been started
 23 within two to three weeks?
 24 A. Correct.
 25 Q. So coming back, then, to the letter of 19 October 2016

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1 at {CST00003137}, what was your reaction, nearly
 2 four months later, when you discovered that over half of
 3 those actions were still outstanding, 23 out of 43, when
 4 they should have been addressed or at least work started
 5 on them within two to three weeks?
 6 A. Probably frustration.
 7 Q. Did you express that frustration to Janice Wray?
 8 A. I probably would have done, yes.
 9 Q. Did you tell her there was something gravely wrong with
 10 her FRA management system?
 11 A. The — Janice is a facilitator in this. I passed my
 12 documentation back to Janice, who then had other people
 13 undertake the work or the repairs and maintenance
 14 department. I've got no control over their undertaking
 15 of the work. All I can do is report back that the
 16 work — what I see, that these items are not — have not
 17 been undertaken.
 18 Q. My question was: did you advise her or tell her that
 19 there was something gravely wrong with her FRA
 20 management system?
 21 A. I would not have probably said the FRA management
 22 system, more along the lines of: why hasn't this work
 23 been undertaken? Because I wouldn't have —
 24 Q. What did she tell you?
 25 A. I can't remember.

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1 Q. Did she ever give you a reason why, on this occasion at
 2 the very least, more than half of red actions that she'd
 3 identified in your significant findings schedule were
 4 still unaddressed as at four months later?
 5 A. I would have guessed that she'd have probably said to
 6 me, "I'll get back to you, I'll go back to
 7 Repairs Direct".
 8 Q. Given what you have described as your frustration, and
 9 given your knowledge that the TMO was repeatedly missing
 10 your targets, did you factor that into your risk
 11 assessments? I know that we're looking at October and
 12 the last one you did was June. But this would not have
 13 been the first time that this would have occurred to
 14 you.
 15 A. Did I factor them in, sorry, to the risk assessment?
 16 Q. Yes.
 17 A. Inasmuch as would I give them a higher rating because
 18 I knew the work wouldn't get done if I gave it a lower
 19 rating?
 20 Q. Let me take it in stages.
 21 Your discovery that more than half of your red items
 22 were still outstanding four months later, which you say
 23 caused you to be frustrated with the TMO, 2016 wasn't
 24 the first time that you had felt that?
 25 A. Probably not, no.

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1 Q. No. Therefore in 2016, when you did your FRAs, why
 2 didn't you factor into those FRAs or say something about
 3 the fact that even though you are identifying red items
 4 in your significant findings schedules, there is
 5 a problem at the TMO end in completing them?
 6 A. By putting them as high, that would be my way of saying
 7 they've got to be done. But high was, as we've said
 8 yesterday, a British Standard or building regs
 9 requirement. Amber would have a different significance
 10 and then green would be a lower benchmark standard.
 11 Q. Just focusing, if we can, on the items in respect of the
 12 flat entrance doors on page 5 of the letter,
 13 {CST00003137/5}, if we go to that, you say in relation
 14 to item 12g and 12h — 12g is the top item, 12h is the
 15 second item — that these were still outstanding.
 16 If we can go to your second witness statement,
 17 please, at {CST00030186/22}, paragraph 86, you address
 18 this head-on, and you say:
 19 "In the Significant Findings Schedule to my 2016
 20 FRA, for example, I raised the following issues with the
 21 doors to Flats 24 and 112 ..."
 22 Then you set out by transposition what was in your
 23 significant findings schedule.
 24 Then you say this underneath it:
 25 "I was not asked to return to consider the above

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1 before the Fire, nor is it within my knowledge as to
 2 whether or not these issues were rectified. Having
 3 marked these issues as being 'High' priority, however,
 4 I would have expected them to be rectified swiftly by
 5 the KCTMO, or others on the KCTMO's instruction."
 6 Now, just to be clear, that statement is incorrect,
 7 isn't it, because you've looked at these doors on your
 8 visit on 18 October 2016 and reported them as still
 9 outstanding in your letter the next day?
 10 A. Correct.
 11 Q. Yes. So you knew that they hadn't been rectified at
 12 all, whether within two to three weeks or any timeframe?
 13 A. Yes.
 14 Q. And presumably you could tell that work hadn't been
 15 started on the door—closers either?
 16 A. Yes.
 17 Q. Yes. You say:
 18 "Having marked these issues as being 'High'
 19 priority, however, I would have expected them to be
 20 rectified swiftly by the KCTMO, or others on the KCTMO's
 21 instruction."
 22 But again, it must be right that whatever you might
 23 have believed before your 18 October 2016 visit, what
 24 you saw and recorded on that visit taught you that your
 25 expectation of swift rectification by the TMO was

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1 unreal?
 2 A. Yes.
 3 Q. Yes. Did that give you cause for concern that, in your
 4 view, these doors posed a risk to residents in the event
 5 of a fire, and the TMO's attitude towards their remedy
 6 also caused or posed a risk to residents in the event of
 7 a fire?
 8 A. Well, the answer's yes.
 9 Q. Yes. Should you not have emphasised in stronger terms,
 10 rather than saying simply "still outstanding", the
 11 seriousness of these items being outstanding for so
 12 long?
 13 A. Well, that would have been out — the task that I was
 14 given was to check on the items. By saying
 15 "outstanding", that was my observation. The
 16 Fire Brigade would have been visiting the building,
 17 hence the pre-audit, so I would like to think that the
 18 work would be undertaken. If not, the fire service
 19 would have access to all this and they would pick it up
 20 as well.
 21 Q. Your role as a fire risk assessor was to make sure your
 22 client complied with its obligations under the RRO,
 23 among other things.
 24 A. As the fire risk assessor, my role was to undertake
 25 a fire risk assessment, not to say the TMO — sorry,

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1 your phrase?
 2 Q. Let me try it a different way.
 3 Your role as a fire risk assessor was to give all
 4 advice on the basis of observation to your client to
 5 make sure, as best you could, that your client was in
 6 a position to comply with its obligations under the RRO.
 7 A. Correct, give advice.
 8 Q. Yes, and given that, why did you not fearlessly,
 9 ruthlessly, robustly and rigorously tell Janice Wray in
 10 terms that it was unacceptable for these doors to remain
 11 non-compliant for four months?
 12 A. That conversation — would have probably had
 13 a conversation over the telephone or face-to-face.
 14 Q. Right.
 15 Now, did you know that after the fire on
 16 14 June 2017 the BRE had conducted an investigation into
 17 the extent of door-closer failure or absence within the
 18 building?
 19 A. I have knowledge that BRE were involved. I don't
 20 much — know much more than that.
 21 Q. Let's look at their report. It's at {MET00039807}.
 22 It's dated 20 February 2019.
 23 Have you seen this document before? This is its
 24 first page.
 25 A. I'm going to say yes.

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1 Q. Yes, it may become familiar to you.
 2 It was written by Dr David Crowder, Dr Ciara Holland
 3 and also David Butler of the BRE.
 4 If we go to page 76 {MET00039807/76}, at
 5 paragraph 113 they say this:
 6 "There were two—types of door closer found; overhead
 7 and concealed in—leaf. For doors that had burned away,
 8 remains of door closers were recovered from the debris.
 9 69 doors had concealed type door closers fitted and
 10 eight had overhead door closers. There were 43 doors
 11 with no door closers installed. Of the eight overhead
 12 closers, four were working and the remaining four could
 13 not be confirmed whether they had been working or not.
 14 Of the concealed type door closers, 22 were working, 34
 15 were not working and the remaining 21 could not be
 16 confirmed as working or not."
 17 Then if you go to paragraph 114:
 18 "In BRE's opinion, 81 doors were closed at the time
 19 of the fire. This was indicated either by fire damage
 20 patterns to the door or from examination of hinge
 21 positions and fire and smoke damage to the lobby side of
 22 the doorway. Note that the door to Flat 16 has not been
 23 included in this analysis due to the firefighting action
 24 which is known to have occurred in this flat early
 25 during the incident. Of the 81 closed doors, 46 did not

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1 have a working door closer, 22 had a working door closer
 2 and the remaining 13 had door closers installed but it
 3 could not be confirmed if these had been working or not
 4 at the time of the fire."

5 Then if you skip down to paragraph 117:
 6 "Table 3 tabulates these findings relating to flat
 7 front doors. As shown by Figure 67, 28 percent of flat
 8 front doors from Floor 4 to Floor 23 had a door closer
 9 installed that did not work, 36 percent did not have
 10 a door closer installed at all, 18 percent were unknown
 11 with 18 percent of flat front doors with working door
 12 closers. It is worth noting that no door with a working
 13 door closer was found to have been in the open position
 14 at the time of the fire."

15 Now, given the findings that you made in your fire
 16 risk assessments that there were no problems overall
 17 with the self-closing devices, except for the one flat
 18 you mentioned in your 2016 FRA, flat 112, and also your
 19 knowledge of flat 45, are you surprised by the BRE's two
 20 findings, first that 36% of doors had no closers
 21 installed at all, and, secondly, that of doors that did
 22 have self-closing devices installed, 28% did not work?
 23 Are you surprised about that?

24 A. Yes.
 25 Q. Would you agree that that means, as a matter of

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1 mathematics, that 64% of the flat entrance doors at
 2 Grenfell Tower on the night of the fire were not
 3 compliant with the Building Regulations?
 4 A. I am very surprised.
 5 Q. Mathematically it's 64%.
 6 A. Yeah.
 7 Q. Would you agree that even a sample, a properly conducted
 8 sample check of flat entrance doors that you should have
 9 carried out in your fire risk assessments, would likely
 10 have revealed that there were problems with self-closing
 11 devices or the absence of self-closing devices on many,
 12 many more flat entrance doors than you identified?
 13 A. No, I disagree, because even on a sample, if I did —
 14 there's 126 flats in the building. If I did 5%, I would
 15 only be doing, say, six or seven doors, and I could have
 16 picked the seven doors out of the 46% that were working.
 17 Q. Doesn't that tell you that your system of going about
 18 sampling was inadequate because —
 19 A. It was a random sample.
 20 Q. Well, even a random sample, I'm bound to suggest to you,
 21 would have picked up a fair representation, or a fairer
 22 representation of the extent of the door-closer problem
 23 within Grenfell Tower than you picked up. Do you accept
 24 that?
 25 A. No.

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1 Q. Why don't you accept that?
 2 A. Because I could have picked seven doors where they all
 3 worked.
 4 Q. You only ever identified on one occasion in four risk
 5 assessments that there was a missing self-closing device
 6 for one flat front door; do you agree with me that
 7 either you weren't undertaking the sample checks at all
 8 or were undertaking sample checks in such a sporadic and
 9 random way that you were never going to collect a proper
 10 sample?
 11 A. There was no — my samples were an ad hoc sample, I was
 12 never given any percentage to check, so I would only
 13 check when I could actually get in or undertake a check,
 14 and I'm working — or in the building during the day,
 15 when people are probably going to be out.
 16 My understanding as well is, apart from myself
 17 undertaking checks, the ESAs would undertake checks, and
 18 also the residents, if they had a problem with their
 19 door, could report any failure of a door-closer to the
 20 TMO.
 21 Q. The percentages that I've identified I would suggest to
 22 you indicate that your inspections that you undertook
 23 from time to time for the purposes of your fire risk
 24 assessment were not suitable and sufficient.
 25 A. I disagree with you.

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1 Q. And had they been suitable and sufficient, you would
 2 have picked up, if not 64% precisely, a good deal more
 3 by way of number of door-closers that were either
 4 missing or not working; do you accept that?
 5 A. No.
 6 Q. Is it your position that your sample or survey system
 7 was adequate and suitable?
 8 A. Yes.
 9 Q. Even though 64% of door-closers in the building on the
 10 night of the fire were either defective or missing?
 11 A. The sample process — yes, the sample I undertook was
 12 sufficient.
 13 Q. How can that be right?
 14 A. Erm ...
 15 Q. How could it be right that your system or the system
 16 adopted by the TMO was suitable and sufficient when so
 17 many were missed?
 18 A. I was just one of other — there was other people also
 19 doing exactly the same thing as myself, and my
 20 understanding is that the fire service also undertook
 21 an audit of the building, and I can't remember if they
 22 picked up any self-closers damaged or missing during
 23 their audit either.
 24 Q. Well, now you're talking about someone else's
 25 responsibility; I really want to know about yours, your

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1 system as the fire risk assessor.
 2 A. My system as the fire risk assessor, as and when
 3 I could, I would access a flat and check the door.
 4 Q. And did you ever report to or advise the TMO that in
 5 your opinion, on your visit, you had not been able to
 6 access what you regarded as a sufficient and suitable
 7 number of doors so as to be able to satisfy yourself
 8 that the door-closers within the building were, in
 9 general, present and working?
 10 A. I was happy with the process that I had for checking the
 11 doors.
 12 Q. Can I then turn to the TMO's policy on inspection and
 13 maintenance of the door-closers.
 14 Would you agree, first, that flat entrance doors
 15 generally need to be checked for maintenance to see that
 16 they're being maintained properly?
 17 A. Correct.
 18 Q. Yes. Even those that had been replaced in the door
 19 replacement programme that started in 2011; yes?
 20 A. Yes.
 21 Q. Yes.
 22 Let's look at {HOM00045964/125}, the LGA guide.
 23 I would like to look at paragraph 82.3 to 82.5.
 24 This falls under section 82, "Inspections and repairs of
 25 other fire safety measures", and this is under the

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1 subheading "Fire-resisting doors".
 2 82.3 says:
 3 "Good practice is to inspect timber fire-resisting
 4 doorsets on a six monthly basis [six-monthly basis] as
 5 part of a programme of planned preventive maintenance.
 6 These inspections are aimed at identifying defects such
 7 as:
 8 " ■ missing or ineffective self-closing devices."
 9 As one of a number of bullets.
 10 Then the last bullet:
 11 " ■ doors which have been replaced using
 12 non-fire-resisting types."
 13 You can see the other items in the list as well.
 14 Then under 82.4:
 15 "Flat entrance doors should be included within this
 16 programme. Where leasehold flats are involved, this
 17 will only be possible if there is a legal right of
 18 access, by means of a condition within the lease to
 19 carry this out. It is important that any new leases
 20 include such a condition."
 21 Then 82.5, over the page on page 126
 22 {HOM00045964/125}:
 23 "The defects highlighted above will often be obvious
 24 to those carrying out fire safety inspections and,
 25 indeed, it is straightforward to train others to be

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1 alert to them. Where defects are reported, it is
2 important that action is taken within an appropriate
3 timescale and that they are not simply left to the next
4 six—monthly inspection."

5 Do you agree, first, that this is the standard to be
6 applied to the maintenance of flat entrance doors?

7 A. Timber fire doors, yes.

8 Q. You say it only relates to timber?

9 A. That's what the heading that you read out to me was.

10 Q. I see. So you say this doesn't apply at all —

11 A. No, I didn't say that.

12 Q. — to doors that are not made of timber?

13 A. You are saying do I agree; I say I agree with this, but
14 it says in here this is for timber doors.

15 Q. I'm sorry, I'm puzzled. Are you saying that —

16 A. No, I make an observation.

17 Q. Right. I was wondering, because I thought for one
18 moment you were saying that this whole inspection regime
19 simply had no application to any door other than that
20 which was made of timber.

21 A. No, I'm not saying that, I'm just making an observation,
22 it says timber.

23 Q. Right. So do you agree that flat entrance doors should
24 be subject to a six—monthly programme of planned
25 preventative maintenance of internal and external

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1 inspections?

2 A. In an ideal world, yes.

3 Q. In an ideal world?

4 A. Please —

5 Q. Why ideal? This is the LGA guidance. This isn't —

6 A. Guidance.

7 Q. Well, yes, but guidance isn't aimed at the — is that
8 how you saw it?

9 A. No.

10 Q. This was Dr Pangloss, this was just what would happen in
11 the best of all possible worlds, or was this what you're
12 supposed to do?

13 (Pause)

14 A. No, this would be the requirement, sir.

15 Q. Yes. To be fair, it's guidance, not a legal
16 requirement, but it's guidance. You accept that.

17 Now, let's go to paragraph 91 of your first
18 statement, please, {CST00003063/32}. You say there:

19 "As far as I was aware, at all times during my
20 involvement with the Tower, the Estates Services
21 Assistants (or 'ESA', and at one time called caretakers)
22 for the Tower, who were KCTMO staff, were on a regular
23 basis checking for maintenance of the doors including,
24 for example, checking that the self—closing mechanisms
25 closed the doors. I was given to understand that the

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1 ESAs had reporting procedures for damaged/defective
2 doors so that any damaged/defective doors could be
3 repaired or replaced. Occasionally I was asked to look
4 at specific doors, for example when I was asked to go
5 and inspect the flat entrance door for flat 45 ..."

6 When you say that you understood that the ESAs were
7 checking for maintenance of the doors, including,
8 for example, checking that the self—closing mechanisms
9 closed the doors, do you mean that you understood that
10 they were doing internal and external
11 observations/inspections?

12 A. Yes.

13 Q. How often did you think they were doing that?

14 A. I don't know the timescale. I know at the point of the
15 2016 FRA we were having discussions on door maintenance,
16 door maintenance programmes and timeframes, et cetera.

17 Q. Right.

18 What was the source of your information, your
19 awareness, that the ESAs were regularly checking inside
20 and out?

21 A. It would only have been with conversations with the
22 health and safety team.

23 Q. Did you understand that that was part of a six—monthly
24 planned preventative maintenance programme, as
25 recommended by the LGA guide as we've seen, at least

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1 from 2011?

2 A. I'm not saying from 2011. I know that's what the TMO
3 were working towards, was a maintenance programme.

4 Q. Right. Was it your understanding that it was part of
5 a six—monthly planned programme of preventative
6 maintenance?

7 A. I can't say that it was six—monthly. I know that there
8 was a planned maintenance programme to be implemented.

9 Q. Right.

10 A. And the LFB I think were involved in that as well.

11 Q. Yes. Again, I'm just asking for your understanding.

12 Just to be clear, what was your understanding about
13 how often this checking took place, this checking —

14 A. It was regular. I've got no timeframes.

15 Q. Right.

16 Let's just dig into this a little bit more closely.

17 Can we go back to 2009, please, and let's look at
18 the FRA you did for Grenfell Tower in the September of
19 that year at {CST00003128/9}.

20 This is part of your schedule, and if you look at
21 item 3.4 at the foot of that page, you can see it says:

22 "Fire compartmentation between corridors and private
23 dwellings."

24 Then it says:

25 "The entrance door to each dwelling appears to be

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1 a rated fire door to FR30 standard.
 2 "As there was no access to all the dwellings it
 3 could not be confirmed if each door is fitted with
 4 an intumescent strip, cold smoke seal and self-closing
 5 device."
 6 If we look on at page 15 {CST00003128/15}, at the
 7 action plan, look at the equivalent item 3.4 at the foot
 8 of page 15, it says:
 9 "Confirmation should be sought that each dwelling
 10 door is to FR30 standard and is provided with
 11 a self-closing device."
 12 Then over the page to page 16 {CST00003128/16}, you
 13 will see it continues, and in the second paragraph it
 14 says:
 15 "It is recommended that a system of formal checks on
 16 tenant fire doors and all other fire compartmentation
 17 doors is introduced and implemented by the TMO to ensure
 18 fire compartments remain fit for purpose.
 19 "NB this should extend to all fire doors within the
 20 building."
 21 You gave that, as you can see, a priority rating of
 22 4. Do you see that?
 23 A. Yes.
 24 Q. And it's red.
 25 A. Yes.

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1 Q. That particular recommendation there is red; yes?
 2 A. Yes.
 3 Q. So to summarise it, is this right: in 2009, so far as
 4 you were told, there was no planned preventative
 5 maintenance programme being carried out by ESAs or
 6 anyone else for compartmentation doors?
 7 A. Looking at this, that's correct, yes.
 8 Q. Yes.
 9 Now, let's move on a year.
 10 We know that on 24 September 2010 you met
 11 Janice Wray, having just won the medium-risk contract,
 12 and you recorded that in your letter of
 13 27 September 2010.
 14 If we go to that again, {CST00003061}, if we scroll
 15 down to the middle of the page, you can see that the
 16 third item down is:
 17 "Routine in-house fire safety inspections and safety
 18 checks for residential buildings."
 19 If you go to page 2 in this document
 20 {CST00003061/2}, you will see that you go on to say,
 21 under the corresponding heading at the foot of that
 22 page, which has a title, if we scroll to the foot of
 23 page 2, "Routine in-house Fire Safety Inspections and
 24 Safety Checks for Residential Buildings", you say this:
 25 "The caretakers and building wardens regularly walk

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1 the building and on a monthly basis record their
 2 findings, but if there are any defects noticed any time
 3 there are reported. A defect reporting policies and
 4 procedures in place so that any discrepancies or damage
 5 can be repaired or items replaced. Please see
 6 Appendix A for the 'Caretakers Checklist'.
 7 Now, let's look at the caretakers checklist, first
 8 of all. This is at page 6 {CST00003061/6}.
 9 This is appendix A. You can see that items 2, 3 and
 10 4, certainly 2 and 3, are about checks on doors, aren't
 11 they?
 12 A. Yes.
 13 Q. Those apply to the main entrance door, don't they, and
 14 the final exit door? But then if you look further down,
 15 at 8:
 16 "Whilst walking around the building check if any
 17 residents have replaced their flat entrance doors, this
 18 could be with [uPVC] ones that are not fire rated, if
 19 there are any changes please report this."
 20 Then 9:
 21 "Whilst walking around the building check if any
 22 residents have installed gates or other security devices
 23 over their flat entrance doors this could obstruct the
 24 fire service if they had to gain entry to the dwelling.
 25 If there are any such added security features please

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1 report this."
 2 Then 13:
 3 "If there are any fire doors in corridors etc check
 4 they are not damaged, they operate correctly, fully
 5 self-close, do not binding on floor, the hinges are
 6 intact and if fitted the intumescent strips and cold
 7 smoke seal are not damaged."
 8 Then 14:
 9 "If there are any, check that the fire doors of the
 10 refuse chute rooms, store rooms are not damaged, they
 11 operate correctly, fully self-close or are locked shut,
 12 do not binding on floor, the hinges are intact and if
 13 fitted the intumescent strips and cold smoke seal are
 14 not damaged."
 15 Now, I have been through that at some length, but
 16 I think I'm right in saying that the final exit door is
 17 not a flat entrance door.
 18 A. Correct.
 19 Q. So the only checks in the caretakers' list to the flat
 20 entrance doors being done by caretakers or wardens on
 21 their rounds were those set out in paragraphs 8 and 9,
 22 as I've shown you, if we go back to those on the
 23 previous page. Is that right? Only 8 and 9 relate to
 24 flat front doors.
 25 A. Correct.

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1 Q. It looks — correct me if I'm wrong, Mr Stokes — as if
 2 those only required visual inspections from the outside;
 3 yes?
 4 A. Yes.
 5 Q. They didn't require the caretakers to check the list of
 6 items set out in the LGA guide, such as missing or
 7 ineffective self-closing devices, or the removal of
 8 locks without suitable repairs to the integrity of the
 9 doors.
 10 A. But this was written before the LGA guide was published.
 11 Q. Yes. Was it updated thereafter to reflect the
 12 LGA guide?
 13 A. This letter wasn't, but the — I believe the caretakers'
 14 handbook was.
 15 Q. Was it? Maybe we will look and see what happened.
 16 Let's move on then. I think what you're suggesting
 17 is that there would have come a time when the
 18 caretakers' list, as we've seen here, would have been
 19 revised to reflect the LGA guidance?
 20 A. I'm pretty certain because I can remember comments being
 21 made.
 22 Q. Right. Comments being made, but do you remember
 23 a document being amended?
 24 A. I think I've got a copy of their handbook and I'm sure
 25 it's dated later than 2010.

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1 Q. Well, we can have a look at that. I think there will be
 2 time for that.
 3 Let's move forward to 2010 and look at the FRA for
 4 that year, please, {CST00003181/21}.
 5 The question I'm about to ask you, of course, must
 6 be answered against the background of the fact that the
 7 LGA guidance is not yet in being.
 8 If you look at pages 21 and 22, this is "Testing and
 9 maintenance", you can see that you don't record any
 10 details there about the maintenance of flat entrance
 11 doors, do you?
 12 A. No.
 13 Q. No. In fact, it's not even listed as a question in your
 14 template.
 15 A. The testing and maintenance of flat entrance doors would
 16 be not covered in this section because this would be
 17 communal areas. The flat entrance door would be demised
 18 to the occupant of — or the dwelling.
 19 Q. So the maintenance and routine inspection of flat
 20 entrance doors and particularly self-closers you say
 21 falls outside the scope of the RRO, do you say?
 22 A. No, I would say it falls out — this is before the
 23 LGA guidance, but testing and maintenance would fall
 24 outside, I would think, this section, which is concerned
 25 with the common parts. It would come into section — in

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1 my document, it would come into section 12.
 2 Q. Ah, okay. So if we go to section 12 in this document,
 3 which I can find for you, it starts on page 14
 4 {CST00003181/14}, "Means of escape from fire", and
 5 page 15, which tick-box would it have fallen into?
 6 A. The one that says about self-closers.
 7 Q. So that's on page —
 8 A. The next page down.
 9 Q. — 15 {CST00003181/15}, is it? Yes. So that's the
 10 fourth from bottom:
 11 "Where appropriate are any fire doors fitted with
 12 self closing devices and do these function correctly?
 13 Yes."
 14 My question is about maintenance and inspection.
 15 A. So at this time the maintenance side — I think in the
 16 later ones it actually has a maintenance regime in it as
 17 a section rather than — as in the text itself, not as
 18 a question.
 19 Q. Yes. So it's not in this template?
 20 A. No.
 21 Q. That's the point I'm really trying to get to.
 22 A. Oh, sorry.
 23 Q. So when you came to do this FRA on 30 December 2010, did
 24 you follow up with Janice Wray about the recommendation
 25 that you had made in your 2009 FRA, which we saw

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1 earlier, about having formal checks on tenant doors?
 2 Can you remember I showed you 3.4 —
 3 A. Yes.
 4 Q. — as an action plan item?
 5 Did you follow up with her the following year when
 6 you came to do your FRA for the building?
 7 A. It's so long ago, I can't remember, sir.
 8 Q. It doesn't look as if you did.
 9 A. No.
 10 Q. Right. Indeed, I think it's right to say that
 11 maintenance or a maintenance regime for inspecting and
 12 maintaining flat entrance doors never appeared as
 13 a question in any of your FRAs?
 14 A. Probably not, no. I can't remember if it's a question
 15 in PAS 79 either.
 16 Q. Even after 2011, when the LGA guidance came in?
 17 A. Well, PAS 79 would have been the 2012 one. I can't
 18 remember it being a question in PAS 79 either.
 19 Q. You can't remember it, but it's in the LGA.
 20 Between 2010 and 2013, do you remember being made
 21 aware of any other maintenance checks of fire doors
 22 being carried out?
 23 A. I think there was ongoing discussions all the time,
 24 hence that's why I say that it's — I've got it in my
 25 mind that one of the TMO's requirements under defect

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1 reporting is that it's up — it was part of the
 2 requirement that all residents should report any
 3 failures of their doors to the TMO immediately.
 4 Q. Do you remember attending a meeting on
 5 8 November 2012 — that's never a promising start to
 6 a question in 2021, but do you remember attending
 7 a meeting in the latter part of 2012 with a gentleman
 8 called Andy Jack from the LFB?
 9 A. As part of the TMO, yes.
 10 Q. Yes. I'm going to show you his recollection of that
 11 meeting, but do you remember yourself that at the end of
 12 that meeting there was a discussion about the
 13 maintenance of doors and door-closers?
 14 A. And also I believe what the criteria of a fire door was
 15 and whether it needed to be changed, yes.
 16 Q. Oh, you have a specific recollection of that, do you?
 17 A. I think because this was an ongoing item that was —
 18 raised its head more than once later on.
 19 Q. Right. I don't think we have a note of that meeting,
 20 and I am just curious to know how you can remember so
 21 long ago that that's what was discussed?
 22 A. The whole meeting was about leaseholder doors.
 23 Q. Yes. So you remember it, do you?
 24 A. Yes.
 25 Q. So perhaps I was wrong to say that it was unfair.

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1 Let's have a look and see what Andy Jack says about
 2 that, please, at {MET00040001}. It's a police statement
 3 he made on 7 May 2019.
 4 If we go to page 19 in this document
 5 {MET00040001/19}, please, at the very top of the page,
 6 first paragraph, he says:
 7 "By my recollection, we further discussed the issue
 8 of doors and door closers in relation to the maintenance
 9 and management requirements of the RRFSO under
 10 article 17 and article 11. The point being made by me
 11 that collectively there was a need not only to maintain
 12 doors and self-closing devices in an efficient state and
 13 good working order but that this should be subject to
 14 effective planning, organisation, control, monitoring
 15 and review. The extent of the monitoring and
 16 maintenance regime would need to be circumstances
 17 specific so that sufficient checks of the ongoing
 18 functionality of fire resisting doors and self-closing
 19 devices could be monitored and necessary remedial action
 20 undertaken in a timely manner. My recollection is that
 21 it was at this point that checking of fire resisting
 22 compartmentation generally as part of the fire risk
 23 assessment process was also discussed. The point being
 24 raised, though I cannot recall by whom, that gaining
 25 access to flats to undertake any sort of intrusive

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1 checks such as drilling into ceilings to confirm their
 2 construction and fire resistance, was difficult and may
 3 be contrary to terms of lease or tenancy. I highlighted
 4 the possibility of carrying out these types of checks in
 5 flats which had become vacant or as it is known 'a
 6 void'. Another check that I was aware of being applied
 7 was a less intrusive check of the self-closer and any
 8 obvious compartmentation issues such as fire stopping
 9 around pipework, which was done at the time of
 10 a landlord's gas safety check, though clearly that would
 11 not be applicable in all cases."
 12 Does that general description of what happened at
 13 that meeting accord with your own recollection —
 14 A. Yes.
 15 Q. — of that discussion? It does.
 16 So would you agree that you were aware from
 17 Andy Jack that there was a need for a monitoring and
 18 a maintenance regime for flat entrance doors and, in
 19 particular, self-closing devices?
 20 A. Yes.
 21 Q. Did you discuss Andy Jack's advice, as we can see from
 22 this statement, with Janice Wray after the meeting?
 23 A. I would have done.
 24 Q. You say you would have done; do you remember it or —
 25 A. I can't remember it, but it would have done — I would

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1 have done.
 2 Q. Right.
 3 Can we then look at the TMO's 2013 fire safety
 4 strategy signed by Janice Wray in November 2013 at
 5 {TMO00830598/15}.
 6 Page 15 is where she signs it off, and page 16
 7 {TMO00830598/16} is where we see appendix A. In fact
 8 it's appendix 1, but it's called appendix A in the
 9 document.
 10 Are you familiar with this document?
 11 A. I've seen it, yes. I think I made comments on it.
 12 Q. Yes.
 13 If we go to page 18 {TMO00830598/18}, then, you can
 14 see on that page that there is a requirement, about
 15 a quarter of the way down, to check communal fire doors
 16 and chute room doors; do you see that?
 17 A. Yes.
 18 Q. And in green it says:
 19 "Not damaged, fully self-closing, not binding on
 20 floor, or frame, hinges intact, intumescent strips and
 21 cold smoke seal intact where present?"
 22 Those criteria look like they come from your
 23 27 September 2010 letter; yes?
 24 A. Yes.
 25 Q. Yes. We don't see any requirement for flat entrance

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1 doors in this document. I mean, by all means we can
 2 check it through, but we don't see one.
 3 Do you agree that there was no requirement in this
 4 appendix, which was the checks to be carried out or
 5 maintenance regime to be carried out, in respect of flat
 6 entrance doors?
 7 A. It appears so, yes.
 8 Q. Why was that? Why was it missing?
 9 A. I can't comment on it, I didn't write the document.
 10 I checked — made comments on the document. This is
 11 an internal TMO document.
 12 Q. Yes, you did make comments on it, as you say.
 13 My question really is: given that Andy Jack's advice
 14 had been given to you at a meeting on 8 November 2012,
 15 and given that this document was produced and certainly
 16 finalised by the TMO a year later, are you able to
 17 explain why there is nothing in it about estate staff
 18 inspecting door-closers?
 19 A. You'd have to please ask the TMO.
 20 Q. But you commented on this document, as you say. Did you
 21 tell Janice Wray that one of the things that the estate
 22 staff needed to inspect routinely was the door-closers
 23 on the inner leaf of tenants' doors?
 24 A. It appears not.
 25 Q. No, and why is that? Is there an explanation for that?

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1 A. I'm only going to say that I commented on the document
 2 as it was in standing, not to add additional items above
 3 and beyond what was already there.
 4 Q. Right.
 5 If we just go back to page 2 of this document
 6 {TMO00830598/2}, "Management Arrangements for
 7 Fire Safety", in the first bullet point under
 8 paragraph 5:
 9 "Programme of regular estate inspection, risk
 10 assessments and monitoring by Neighbourhood Staff and
 11 Health & Safety."
 12 Then it goes on:
 13 "Specifically, inspections ensure that combustible
 14 items and storage are not present in the communal areas,
 15 fire doors are operating effectively, emergency lighting
 16 is maintained, final exit doors are operational, signage
 17 has not been removed or defaced ..."
 18 But you saw "fire doors are operating effectively".
 19 When it refers to fire doors to be checked there,
 20 did you understand that that meant communal fire doors
 21 or did you include flat entrance doors in your
 22 understanding?
 23 A. To be honest I would — my understanding is fire doors,
 24 so fire doors per se.
 25 Q. Yes, and if we look at page 11 of this document

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1 {TMO00830598/11}, under section 17, "Flat Entrance
 2 Doors", you can see on page 11 and page 12 what is there
 3 and what isn't there.
 4 I'm putting to you that what is not there is any
 5 suggestion at all of any regime for planned preventative
 6 maintenance of flat front doors.
 7 A. Okay.
 8 Q. Do you accept that?
 9 A. Yes.
 10 Q. Again, why is that, do you know?
 11 A. I've got no idea. I know that there was ongoing issues
 12 or background issues about maintenance and access, maybe
 13 it was covered in that, but I can't comment.
 14 Q. Well, help me with this, because it's right, isn't it —
 15 and you have accepted this before, shortly ago — that
 16 before this policy was approved, you were asked for
 17 advice on what it should include, weren't you?
 18 A. I think I was asked to run my eye over it, to look at
 19 the document, not to be part of the ... not to add
 20 anything extra. "Is this okay, have a look at this
 21 document", not to ... sorry, I'm trying to think of the
 22 word ... to add anything — you know, additional items
 23 to it.
 24 Q. Can we go to {CST00001187}. Let's see exactly the terms
 25 in which Janice Wray asked for your assistance.

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1 This is an email sent to you on 18 January 2013.
 2 Note the date, two and a bit months after the
 3 8 November 2012 meeting with Andy Jack of the LFB:
 4 "Attached is a very, very rough draft of this and
 5 I would be really grateful for your comments.
 6 Specifically, what else should I include, are there
 7 areas where more detail is required, any other [areas]
 8 to be included etc. (The last page is a brain dump of
 9 other things I maybe should include — what do you
 10 think?)
 11 "Really appreciate [your] help with this as I am
 12 sick of the sight of it!"
 13 Then there is some personal stuff at the end.
 14 What she is attaching is a draft fire safety policy.
 15 Now, you provided a mark-up with your comments on
 16 1 February. Can we look at that, that's {CST00002046}.
 17 We can see that green highlighter is your comments,
 18 inserts, yellow highlighter is your suggested deletions,
 19 and light blue highlighter is your questions.
 20 So just to be clear about what we're looking at,
 21 what we're looking at — is this right? — is the
 22 document she sent you, which you have then sent back to
 23 her with these colour-coded changes in it?
 24 A. Yes.
 25 Q. If we look at the section on flat entrance doors at

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1 page 10 {CST00002046/10}, let's see that. You need the
 2 foot of the page, item 17, "Flat Entrance Doors".
 3 You have added the words "rated or resistant" and
 4 purported to delete "retardant", but that's the only
 5 change you made there; yes?
 6 A. Yes.
 7 Q. You didn't suggest that there should be a planned
 8 maintenance programme, did you?
 9 A. No.
 10 Q. And you didn't suggest that there should be a flat
 11 entrance door inspection every six months as by now set
 12 out in the LGA guide, as we've seen?
 13 A. Correct.
 14 Q. No. Why was that?
 15 A. I thought this was what I was asked to do and I've
 16 undertaken the task I was given.
 17 Q. Well, yes, but we've seen the terms in which she asks
 18 for your assistance; why did you not add the need for or
 19 policy which would cover a planned maintenance programme
 20 for flat entrance doors with an inspection every
 21 six months, as by now set out in the LGA guide?
 22 A. I can't answer that question.
 23 Q. Well, is it because you have no answer?
 24 A. Well, yes.
 25 Q. Yes, I see, thank you.

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1 We also see that you suggested deleting words in
 2 yellow, and if we go to page 11 {CST00002046/11}, under
 3 17.2, we can see that in the third bullet point there
 4 you suggested the deletion of the words:
 5 " ... approximately 44mm thick solid doors which are
 6 close fitting and have self-closing device fitted to
 7 them (where no self-closer fitted one to be requested)".
 8 Why did you delete that or suggest that deletion?
 9 (Pause)
 10 A. Is it not above? Sorry, I'm putting my glasses on.
 11 (Pause)
 12 So "approximately 44mm thick" is in three lines
 13 above.
 14 Q. I see, so you deleted that because it was a repeat?
 15 A. Yes.
 16 Q. I see.
 17 A. It's exactly the same sentence, it's a repeat —
 18 Q. It's a drafting change, is it?
 19 A. Yes, it's two lines above, if you look:
 20 " ... to be a 'nominal' fire door — a solid door
 21 which is approximately 44mm thick which is close fitting
 22 within its frame ..."
 23 Then it's repeated again underneath.
 24 Q. If you look at the last page of this document at page 36
 25 {CST00002046/36}, you can see Janice Wray's brain dump

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1 additional list of items. She specifically includes
 2 self-closers about a third of the way down her list;
 3 yes?
 4 A. Yes.
 5 Q. Other than the part you've left in above the part you
 6 deleted, we referred to a moment ago, you don't suggest
 7 anything further in relation to self-closers. The
 8 question is: why didn't you include the guidance
 9 provided by the LGA guide on the need to install
 10 self-closing devices on nominal fire doors?
 11 A. Sitting here now, I can't answer that question, but I'm
 12 looking at this, and mobility scooters is in the brain
 13 dump, and that was included later on, so we had
 14 a conversation. I can't answer the question any more
 15 than that.
 16 Q. Would you agree in general that there was no and was
 17 never any planned preventative maintenance programme in
 18 place at the TMO for flat entrance doors?
 19 A. There — at the time of writing this document, there was
 20 discussion about it, but it's unfair to say that there
 21 was never a programme in place, because by the time of
 22 2016 there was a programme in place.
 23 Q. For maintenance and inspection?
 24 A. For inspection, that was part of the — so inspection
 25 would be undertaken when a flat was empty, et cetera, so

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1 it was all coming in, it was ongoing issues.
 2 MR MILLETT: Mr Chairman, is that a convenient moment?
 3 SIR MARTIN MOORE-BICK: Yes, I think is probably is.
 4 We'll have an afternoon break at this point,
 5 Mr Stokes.
 6 THE WITNESS: Sir.
 7 SIR MARTIN MOORE-BICK: We will come back at 3.35, please.
 8 THE WITNESS: Sir.
 9 SIR MARTIN MOORE-BICK: As before, please don't speak to
 10 anyone about your evidence while you're out of the room.
 11 All right?
 12 THE WITNESS: Sir.
 13 SIR MARTIN MOORE-BICK: Thank you.
 14 (Pause)
 15 Right, 3.35.
 16 MR MILLETT: Thank you, Mr Chairman.
 17 (3.18 pm)
 18 (A short break)
 19 (3.35 pm)
 20 SIR MARTIN MOORE-BICK: All right, Mr Stokes, all ready to
 21 keep going?
 22 THE WITNESS: Sir.
 23 SIR MARTIN MOORE-BICK: Good, thank you very much.
 24 Yes, Mr Millett.
 25 MR MILLETT: Yes, Mr Chairman, thank you.

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1 Mr Stokes, your last answer before the break said
 2 that there was a programme in place by the time of 2016.
 3 Just to be clear, did you mean that there was
 4 an inspection and maintenance programme for flat front
 5 doors by 2016?
 6 A. My understanding one was to be implemented or being
 7 implemented at that time.
 8 Q. Can you elaborate, what precisely was it as at 2016 that
 9 was being implemented by way of an inspection regime or
 10 maintenance regime for flat front doors?
 11 A. I can't be specific, but I can remember that there was
 12 something in place at that time, or to be put in place.
 13 Q. Can we then turn next to the question of Adair Tower.
 14 Now, there is a run-up to this, which starts in
 15 2014. Can we look at the FRA that you did for
 16 Adair Tower on 20 February 2014 at {CST00011615},
 17 please. That's the first page.
 18 Now, can we turn in that to page 19 in that document
 19 {CST00011615/19}. On page 19, in the text towards the
 20 foot of the page, you can see, six lines up from the
 21 bottom, it says:
 22 "The flat entrance doors ..."
 23 Do you see that?
 24 A. Yes.
 25 Q. "The flat entrance doors are not fitted with self

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1 closing devices."
 2 That's what you say in the commentary box.
 3 A. Yes.
 4 Q. Now, if we go to your significant findings and action
 5 plan of the same date at {LFB00001695}. That's the
 6 first page.
 7 If we scroll down to page 2 {LFB00001695/2}, you can
 8 see the 12s, 12a, b, on that page. You've got the
 9 reference to flat 42 having a camera outside their flat
 10 entrance, you've got other matters about flat entrances,
 11 but you don't have anything there about self-closing
 12 devices, and we haven't been able to find anything
 13 anywhere in this significant action plan about
 14 self-closing devices. That's correct, isn't it? One
 15 can scroll through it and spend an afternoon —
 16 A. Sorry, can I have a moment to think about Adair Tower.
 17 Sorry, I just want to bring it up in my mind.
 18 Q. Yes, of course.
 19 What we can do — let me see if this helps you
 20 better — is start on page 1 of this document and then
 21 scroll slowly down the pages, looking at the items.
 22 I started on page 2 with 12 because that's where
 23 I thought we would find flat entrance doors.
 24 Is there anywhere else in this document that we
 25 would find flat entrance doors and self-closing doors,

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1 if we were to look through it?
 2 It's only four pages long. Perhaps we can show the
 3 witness page 3.
 4 A. So the question you're asking is there's nowhere here
 5 about flat entrance doors needing self-closing devices;
 6 is that correct?
 7 Q. That's right. I'm really trying to show you a negative.
 8 There is nothing in here we have been able to see where
 9 you recommend that flat entrance doors in Adair Tower be
 10 fitted with self-closing devices as a fact.
 11 A. Okay.
 12 Q. The question, following on from that, is: why is that?
 13 Why is there nothing in there about self-closing
 14 devices?
 15 A. Sorry, I'm trying to think. This is an unusual
 16 building. It has a sister building which is similar in
 17 design.
 18 Q. Is that Hazlewood?
 19 A. Yes. Is it possible, please, to look at the FRA for
 20 this building?
 21 Q. Yes. {CST00011615}. That's the first page of it.
 22 Is there anything specific within it you would like
 23 to see? Section 19 maybe?
 24 A. No, sir. Would it be possible, please, to see about
 25 construction, on about page 4 {CST00011615/4}? Sorry,

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1 I'm being vague because I can't remember the — sorry,
 2 this one, yes.
 3 Q. Construction, brick and concrete?
 4 A. Yes, sorry.
 5 (Pause)
 6 Thank you.
 7 In this — this was — sorry, this building — so
 8 the use and layout. There was two staircases, if we're
 9 looking at the building, a left and a right staircase.
 10 One staircase is completely open to the elements,
 11 a vented screen on one side with a staircase, and then
 12 the screen on to the lift lobby area is then open, and
 13 this building and its twin building, I always asked —
 14 I was asking the questions all along: was it ever
 15 designed that the lift lobby areas in this building were
 16 an open area? Because on one staircase it is completely
 17 open to the elements, and then there's a screen
 18 internally open to the elements. Was it ever designed
 19 so that the lift lobby area was an open area to
 20 elements, and therefore at the time of construction
 21 wouldn't have needed self-closing devices?
 22 Q. Let's look at the bottom of the page, "Use and Layout of
 23 the Building". This might help you. I'm not sure I'm
 24 really going to be able to stand here spending time
 25 examining the document.

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1 A. What I'm saying is —
 2 Q. Let's see if that helps you. I'm trying to assist you
 3 with this. "Use and Layout of the Building", halfway
 4 through that text it says:
 5 "On opposite sides of the flat / lift lobby there are
 6 staircases located these run the height of the building
 7 both have self closing 30 minute fire rated doors
 8 separating them from the flat / lift lobby areas. The
 9 protected staircase is total fire separated from the
 10 flat / lift lobby areas at each floor level and has an
 11 exit at the ground floor to open air. The other
 12 staircase has louvered vents in the screen between the
 13 staircase and the flat / lift lobby areas, is open at its
 14 base with the entrance lobby area and has the opening
 15 for the purpose built refuse chute on its landings at
 16 each floor level."
 17 Does that help you?
 18 A. Yes. So I think this building was a case that this
 19 document here — and it would say in here that at one
 20 point was — I was asking the question: was this open to
 21 elements and therefore self-closers were not needed
 22 because the flat doors were open to open areas? And the
 23 question: do they needed(sic) to be fitted?
 24 Q. My question was why there was no recommendation in this
 25 FRA that the flat entrance doors in Adair Tower be

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1 fitted with self-closing devices?
 2 A. Because they were external doors, open to the elements.
 3 Q. Is that your answer?
 4 A. Yes.
 5 Q. I see. And do you remember that that was something you
 6 consciously considered at the time when considering the
 7 question of whether there should be anything said about
 8 the absence of self-closing devices on flat entrance
 9 doors?
 10 A. Yes, because it would be in this document somewhere that
 11 that was the reasoning behind it, and it was always
 12 asked the question why, and I'm trying to do this from
 13 memory, please, sir, but there is no — if I remember
 14 correctly, there is no ventilation on the lift lobby
 15 areas, which gave me the reasoning to think that these
 16 were open, and if this is the building I think it is,
 17 there was a concession made and the fire service
 18 accepted that they're going to — after there was a fire
 19 in this building, that the screen should be closed up
 20 with the vents in it, Exova were brought in to undertake
 21 a survey, and it was accepted by the fire service that
 22 an AOV system would not be fitted or a smoke control
 23 system wouldn't be fitted to the lobby areas, but they
 24 would accept half-open windows. Something along those
 25 lines.

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1 Q. All right, let's see how we go with that detail.
 2 I've shown you this FRA. It's 20 February 2014.
 3 Do you remember that in October 2015, the LFB or the
 4 LFEPA issued a deficiency notice in respect of
 5 Adair Tower; yes?
 6 A. And that was — yes.
 7 Q. Let's go to that. It's {LFB00001613}.
 8 It's dated 12 October 2015, as you can see, and it's
 9 addressed to Janice Wray at the TMO.
 10 Do you remember seeing this document at the time?
 11 A. I would have done, yes.
 12 Q. Yes, and do you remember that it raised an issue with
 13 the fact that the flat entrance doors did not have
 14 self-closers?
 15 A. Yes.
 16 Q. Do you remember providing any advice to Janice Wray on
 17 this document at the time?
 18 A. I can't remember specific advice, but I would have
 19 provided advice, yes.
 20 Q. Now, on 31 October 2015, there was a fire at
 21 Adair Tower; do you remember?
 22 A. Yes.
 23 Q. And, in consequence, do you remember that you were asked
 24 to produce a note of your initial views for the TMO?
 25 A. Yes.

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1 Q. And I think you carried that out on 3 November 2015;
 2 yes?
 3 A. Yes.
 4 Q. This is at {TMO00843551}. We'll start with page 1.
 5 It's a document entitled "Initial views of Fire Risk
 6 Assessor following his inspection of Adair Tower on 3rd
 7 November 2015".
 8 Now, this obviously isn't an FRA, is it?
 9 A. No.
 10 Q. If we look at page 2 {TMO00843551/2}, under the heading
 11 "Doors", it says there:
 12 "The original flat entrance doors within this
 13 building were fire-rated doors fitted with rising butt
 14 hinges which was the standard at the time of
 15 construction."
 16 Just pausing there, rising butt hinges, those are
 17 a form of self-closer, aren't they?
 18 A. Yes, basically, yes.
 19 Q. I mean, they were the form of self-closer which was
 20 deprecated by the 2011 LGA guidance.
 21 A. Sorry, I don't understand the word "deprecated".
 22 Q. Which the LGA guidance said shouldn't be used anymore.
 23 A. Correct.
 24 Q. You can see certainly that they had self-closers of
 25 a kind at that time; yes?

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1 A. (Witness nods).
 2 Q. Yes. Then it goes on:
 3 "As per the TMO's policy as any flat entrance doors
 4 are replaced they will be replaced with doors to the
 5 standard required by the Building Regulations."
 6 Do you know that rising butt hinges on flat entrance
 7 doors by 2015 were contrary to the LGA guidance?
 8 A. Correct, yes.
 9 Q. But nonetheless they were a form of self-closer on the
 10 doors in this building.
 11 Do you remember that, following your report, you
 12 produced a fire risk assessment on 11 November 2015?
 13 That's at {TMO10044133}. I don't think we need to go to
 14 it.
 15 My question is: why did you carry out an initial
 16 report and then a fire risk assessment? Why not just
 17 provide an FRA?
 18 A. I've got no idea. I would have been asked to provide
 19 probably an initial report and a risk assessment.
 20 Q. Right.
 21 Let's go to the significant findings and action
 22 plan. This is at {CST00026368/3}.
 23 You can see there, second row from the bottom, 12e,
 24 "High":
 25 "The flat entrance doors in this building have

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1 rising butt hinges on most of them, a good percentage of
 2 the flat entrance doors in this building are to be
 3 changed for new doors, item 12c above."
 4 Then it says:
 5 "I would recommend that any flat entrance doors in
 6 this building that do not have self closing devices
 7 fitted to them have self closing devices fitted."
 8 Do you see that?
 9 By marking the action high priority, that meant that
 10 it should be actioned, in other words work should start
 11 on that exercise, within two to three weeks; yes?
 12 A. Correct, yes.
 13 Q. And the red meant that it was a statutory breach, yes,
 14 according to the TMO's fire safety strategy?
 15 A. Yes.
 16 Q. Now, given that nothing had changed in the legislation
 17 or guidance since your last fire risk assessment, the
 18 one we looked at in 2014, why did you now consider that
 19 the lack of self-closing devices was a statutory breach
 20 which required urgent action?
 21 A. Because if you go to 12c above, 17 flat entrance
 22 doors — so many doors had been damaged, they were all
 23 new doors, and from that my initial FRA was these were
 24 on an open — off — external doors.
 25 I believe now that the fire service are now saying,

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1 no, they disagreed with that, because even though there
 2 was louvres to the outside, they would require them to
 3 be fitted with self-closers, and therefore now they
 4 would be fitted with self-closers.
 5 Q. You see, why wasn't the advice consistent with your
 6 previous position, which was that you didn't need
 7 self-closers because the flat entrance doors were
 8 essentially external doors?
 9 A. Well, in this case, the majority of the doors are now
 10 damaged, so they have to be replaced with new doors, so
 11 the new doors would now require to be to building regs
 12 standards of that time, and part of the — after the
 13 fire, the notice was that the louvred vents of the
 14 lift lobby area were now to be blocked off.
 15 Q. Right.
 16 A. There is more than one issue here.
 17 Q. Well, I understand that, but are you, to be clear,
 18 saying that because the standards had changed, and
 19 because doors had to be replaced because they were
 20 damaged, they had to be brought up to the new standard
 21 and had to have self-closers?
 22 A. The lift lobby areas were now not going to be open
 23 areas, they were — open to elements, they were now
 24 going to be enclosed areas. The structural side of the
 25 building was changing.

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1 Q. Right. We may have to examine that a little bit more
 2 closely, but I'm not going to do that now.
 3 Let's move on.
 4 You forwarded your FRA and significant findings and
 5 action plan to Janice Wray, didn't you?
 6 A. Correct.
 7 Q. We know that on 18 November 2015, she then forwarded
 8 that on in turn to Barbara Matthews, Robert Black and
 9 Sacha Jevans. Just for our record, that's
 10 {TMO00866493/4}, we don't need to look at that now.
 11 If we go to page 3 {TMO00866493/3}, though, of that
 12 run, we can see that Peter Maddison also received that
 13 email. I want to look at his reply.
 14 His reply on page 3 and over to page 4 is as
 15 follows — it's actually Sacha Jevans' response to
 16 Peter Maddison at the bottom of page 3:
 17 "Dear All
 18 "Following our review of Carl Stokes' 'Record of
 19 Significant Findings and Action Plan' yesterday
 20 afternoon, I have reflected on what Carl said.
 21 "I do not think that the recommendation to install
 22 door closers throughout the building is appropriately
 23 prioritised (currently 'high') for the following
 24 reasons:
 25 "A. It is not a statutory requirement to install

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1 self closers retrospectively, therefore should not
 2 automatically default to 'High' priority.
 3 "B. I assume that the leasehold flat entrance doors
 4 are demised to the leaseholder (Daniel — can you please
 5 confirm?). We do not have any enforcement power to
 6 install self closers on these doors. The way this is
 7 currently drafted would [compel] us to carry out work
 8 that we don't have the power to enforce.
 9 "I don't have a problem with us setting out to
 10 install door closers following the learning from the
 11 fire, and completing the work promptly. However, we
 12 would be leaving ourselves exposed if we commit to
 13 completing work that we don't have the power to enforce.
 14 "I suggest that the priority is reduced to 'Low', or
 15 'advice' and that we make reference to the fact that we
 16 can't enforce this in leasehold properties.
 17 "Peter."
 18 So, in fact, it was actually a response from
 19 Peter Maddison, but it seems to have come from
 20 Sacha Jevans.
 21 Now, I want to take that in stages, if I can.
 22 First of all, if we go back to the first line on
 23 page 3, please, he says in the opening line of his
 24 email:
 25 "Following our review of Carl Stokes' 'Record of

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1 Significant Findings and Action Plan' yesterday
 2 afternoon, I have reflected on what Carl said."
 3 Now, did you meet with Peter Maddison on
 4 19 November 2015? Do you remember meeting him the day
 5 before?
 6 A. I'm going to say yes, there was a meeting arranged, yes.
 7 Q. Do you remember who else was there?
 8 A. No.
 9 Q. What about Barbara Matthews, was she there?
 10 A. Sorry, I — if you tell me — I have got no record of
 11 minutes. I know there were at least three or four other
 12 people there, Janice Wray being one of them.
 13 Q. Do you know what the purpose of the meeting was?
 14 A. To look at the after-fire incident of what happened
 15 there at that time.
 16 Q. Do you remember giving them any advice at that meeting?
 17 A. Yes.
 18 Q. What was that advice?
 19 A. Undertake the work.
 20 Q. What work?
 21 A. As per the significant findings.
 22 Q. Right. So did you advise them that the retrofitting of
 23 self-closers was not a legal or regulatory requirement?
 24 A. No, I would have said to fit them.
 25 Q. Right.

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1 Do you know, from your own recollection, what the
 2 basis of Peter Maddison's view was that it wasn't
 3 a statutory requirement to install self-closers
 4 retrospectively?
 5 A. Sorry, you'd have to ask him.
 6 Q. Now, did you refer to the guidance in the LGA guide
 7 which says — and it's paragraph 62.19 — that it is
 8 essential that, regardless of which option is chosen,
 9 fire resisting flat entrance doors and doors to protect
 10 common corridors, lobbies and stairways should be fitted
 11 with suitable positive action self-closing devices?
 12 A. I agree with that statement wholeheartedly, but this
 13 building, previous to the work being undertaken, the
 14 lift lobby areas weren't protected lobbies.
 15 Q. But did you point them to the guidance in the LGA guide
 16 to the effect that I've just stated?
 17 A. Because now they're becoming protected lobbies, yes.
 18 Q. So you say you did —
 19 A. I would have told them that they are now protected
 20 lobbies, so therefore there must be self-closing devices
 21 on the doors.
 22 Q. Yes. You can't explain Peter Maddison's understanding
 23 that it wasn't a statutory requirement to install
 24 self-closers retrospectively?
 25 A. No.

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1 Q. Now, looking at the bottom of page 2 in this email run
 2 {TMO00866493/2}, we can see that Barbara Matthews
 3 responds the next day, and at the foot of page 2 she
 4 says, "Dear All", and we need to go to the top of page 3
 5 {TMO00866493/3}. She says:
 6 "I agree with Peter's view that this finding should
 7 be low rather than high as there is no regulation
 8 requiring the retro fit of self closers and we could not
 9 enforce this for leaseholders.
 10 "I have asked Janice to raise this with Carl to
 11 amend the level of this finding. The action currently
 12 reads as a recommendation which we should annotate to
 13 reflect that we will initiate a programme to complete
 14 the work promptly (with the exception of leaseholders
 15 where we can only recommend that they be fitted).
 16 "The Fire Brigade have requested our Significant
 17 Findings and Action Plan and Janice has agreed with Carl
 18 that he will review this report later today and remove
 19 any actions where the work has been completed. Janice
 20 is chasing up the various teams ..."
 21 You're not copied in to any of these emails, but
 22 you've seen them, haven't you, I think?
 23 A. I can't say I've seen them, no.
 24 Q. The reason I ask you that is that we've seen these
 25 emails in your disclosure, so —

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1 A. I would have seen them, then, sorry, yes.
 2 Q. Do you think Janice Wray forwarded them to you?
 3 A. She would have done, no one else would have done.
 4 Q. Now, we see no reference in any of this correspondence
 5 internally within the TMO to the fact that the layout of
 6 the building has changed so as now to necessitate the
 7 application of self-closing devices on flat front doors
 8 where there weren't any previously?
 9 A. Part of the work by Exova was the louvred vents under
 10 the window glazing on one side was to be blocked off.
 11 Q. My point is simply that when we look together at these
 12 emails, we don't see any reference to the fact that the
 13 layout of the building and the blocking off, as you
 14 refer to it, was being changed.
 15 A. No.
 16 Q. So you perhaps can't help me, but it obviously wasn't
 17 a point that was of particular importance to them in
 18 rationalising why self-closers were now needed. Is that
 19 a fair comment?
 20 A. I presume so, yes.
 21 Q. Do you agree with Peter Maddison and Barbara Matthews
 22 that there was no statutory requirement and no
 23 regulation that required installation of self-closing
 24 devices retrospectively?
 25 A. I would agree with them if the building layout hadn't

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1 changed.
 2 Q. Right.
 3 Now, as we can see from Barbara Matthews' email on
 4 the screen in front of you, she says here that she'd
 5 asked Janice to raise with you the amendment of your
 6 level of finding.
 7 Had she or Janice Wray asked you to amend the level
 8 of your findings in your significant findings and action
 9 plans on any other occasion?
 10 A. Not as far as I'm aware.
 11 Q. What did you understand at the time was to be carried
 12 out by the TMO by way of initiating a programme to
 13 complete the work promptly?
 14 A. As quickly as they could undertake the work.
 15 Q. Were you told that they were going to initiate
 16 a programme to complete the work promptly?
 17 A. I can't remember being told that exactly, but I would
 18 imagine they would because, if my memory's correct, then
 19 an enforcement notice was served on this which would
 20 give a timescale.
 21 Q. Yes. Did you have any idea from the discussions you
 22 were having about when it would be completed?
 23 A. No.
 24 Q. You don't. Did you have any idea from your discussions
 25 when the work would be begun?

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1 A. No. Imminently, I would have thought.
 2 Q. You would have hoped, because two to three weeks was
 3 what red meant.
 4 A. Yes.
 5 Q. Let's go to {CST00026445/2}.
 6 This is an email from you to Janice Wray,
 7 20 November 2015. Can we start at the bottom of page 2
 8 in this email run, please, and looking at the top of
 9 page 3.
 10 At the very foot of page 2, it's from you to
 11 Janice Wray 20 November 2015:
 12 "Janice
 13 "My advice is that the item ref fitting self closing
 14 devices stays as a high but as there is the policy in
 15 place regarding advice on fitting door self closing
 16 devices I do not have is a problem with the priority
 17 being stated as 'strong advice' this is partly to
 18 appease the LFB.
 19 "But the fitting of the door self closing devices
 20 must be given a priority by the TMO and repairs direct."
 21 Did Janice Wray ask for that advice, or did you give
 22 it to her unprompted?
 23 A. I would have been asked for it.
 24 Q. The reason I ask you that question, Mr Stokes, is
 25 because we haven't seen an email in which she did so,

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1 but you think she asked you for that advice, do you?
 2 A. Well, I would have thought so, because otherwise
 3 I wouldn't have changed it unless I would have been
 4 asked to.
 5 Q. When she asked you for that advice, do you think or do
 6 you remember that she briefed you about the exchange
 7 with Peter Maddison that we've just seen in the emails
 8 about door-closers?
 9 A. I can't comment, I can't remember.
 10 Q. Can you clarify what advice you are giving here? Just
 11 to be clear, was it to retain self-closers as a high
 12 priority in accordance with the opening words:
 13 "My advice is that the item ref fitting self closing
 14 devices stays as a high ..."
 15 A. Yes.
 16 Q. Or was it to downgrade it to strong advice?
 17 A. No, to stay as a high, but as there is a policy in place
 18 regarding advice on fitting self-closers on doors, I do
 19 not have a problem with the policy being stated as
 20 strong advice.
 21 Q. Priority being stated as strong advice.
 22 A. Yes.
 23 Q. So what were you advising them?
 24 A. That the work has to be undertaken, it is high, it must
 25 be undertaken, and from my memory the work was

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1 undertaken and, the next time I did an FRA, self-closers
 2 were fitted on all doors.
 3 Q. If you were advising that the item referring to
 4 self-closing devices stayed as a high, how were you
 5 downgrading the priority to strong advice at the same
 6 time?
 7 A. Instead of — sorry, without reading what it says on the
 8 document, the — does it say — where it's red, that
 9 stays — but "strong advice" is put in there as the word
 10 rather than "high" — I don't know. Work was undertaken
 11 and the next FRA specifies that self-closing devices are
 12 fitted on all doors.
 13 Q. Yes, I'm just trying to understand the advice, you see,
 14 because I don't understand it at the moment. It starts
 15 by saying that the reference for self-closing devices
 16 stays as a high —
 17 A. Yes.
 18 Q. — but the sentence then ends with saying you don't have
 19 a problem with the priority being stated as strong
 20 advice to appease the LFB.
 21 Well, what were you advising? Which of those two
 22 things were you advising the TMO to do?
 23 A. Both, it stays high and the work must be undertaken.
 24 Q. No, it stays high, but you don't have a problem with it
 25 being stated as strong advice.

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1 A. Yes.
 2 Q. High and strong advice are not the same thing, are they?
 3 A. But reading here and knowing that there was a policy and
 4 procedure in place for fitting self-closing devices on
 5 doors anyway, the work was going to be undertaken. What
 6 word I used ...
 7 Q. What were you doing — can you explain, "I do not have
 8 a problem with the priority being stated as 'strong
 9 advice'?" What is that? What do you mean there?
 10 What's going on?
 11 A. Could we go back to the significant findings and what
 12 does the words in the text in the significant findings
 13 say?
 14 Q. We could, but I am just trying to understand on the page
 15 what your advice means?
 16 A. It means carry on and do exactly what was there as
 17 before.
 18 Q. I'm sorry, it may be my fault, Mr Stokes, I'm puzzling
 19 with this. What was the priority being stated as strong
 20 advice mean?
 21 A. Sorry, does it say before immediate, undertake it
 22 immediately, and I'm now amending it to strong advice?
 23 What I'm saying here is it stays as high, two to
 24 three weeks, and it's strong advice, you will do it.
 25 Q. What did you intend should be said to appease the LFB?

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1 What was in —
 2 A. So —
 3 Q. Let me rephrase the question.
 4 What was it about saying "strong advice" that would
 5 in part appease the LFB, could you help me with that?
 6 A. No, I can't.
 7 Q. Strong advice isn't red, is it, it's white, it appears
 8 in a white box normally in your FRAs?
 9 A. No, that would be advice.
 10 Q. Well, as opposed to strong advice?
 11 A. Yes.
 12 Q. Yes?
 13 SIR MARTIN MOORE-BICK: I'm just wondering whether we've
 14 worked this as hard as it —
 15 MR MILLETT: Well, we probably have.
 16 SIR MARTIN MOORE-BICK: Yes.
 17 MR MILLETT: Why did you want to appease the LFB?
 18 A. It's always better to be on the correct side of the
 19 enforcing authority. Appease means to help.
 20 Q. Well, does it?
 21 A. In my view, yes.
 22 Q. I think there may be people in history who might regard
 23 appeasement as something slightly different from that.
 24 It means what it means, doesn't it? It means stay on
 25 the right side of the enforcing authority.

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1 But why, as an FRA, didn't you simply take the
 2 policy that it stays as a high and the TMO have got to
 3 do what you say?
 4 A. I think this is what it said. The work is already being
 5 undertaken and the work is — was undertaken very
 6 quickly, and in the next FRA all the self-closers are
 7 fitted on the doors.
 8 Q. Yes.
 9 Well, we can see what happened after this email
 10 exchange.
 11 Can we go to {CST00009046}. This is your new
 12 significant findings and action plan for Adair Tower.
 13 That's the first page of it.
 14 If we scroll down to page 5 {CST00009046/5}, we can
 15 see at the top there in white, "Strong Advice". No red,
 16 it's now white.
 17 Why did you downgrade this item from high to strong
 18 advice and take away the red?
 19 A. Because reading the action it says, "TMO accepts this
 20 recommendation", so it's already in place, "and is
 21 committed to progressing the installation of
 22 self-closing devices as a matter of urgency".
 23 So high is now strong advice, but the work is
 24 already in hand, so the work has started.
 25 Q. Well:

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1 "[Programme] of inspection to all doors to start on
2 30th November ... with all works programmed for
3 completion within 20 days of inspection."
4 A. Yes.
5 Q. So the work wasn't already ...
6 A. Well, it would have been. The programme of inspection's
7 to start then, but work would have had to have been
8 undertaken to order in self-closing devices, programme
9 in maintenance men, contractors.
10 Q. Leave aside who filled in that box under "TMO action".
11 We can see that you downgraded this to strong advice.
12 Did you do that because you were under pressure to do so
13 from the TMO?
14 A. That's what it looks like, yes.
15 Q. Yes. Did you think it was appropriate at the time that
16 the TMO should be challenging your professional
17 judgement on what priority should be given to an item in
18 your FRA?
19 A. I'm going to say probably, yes.
20 Q. Why didn't you stand up robustly and independently to
21 the TMO on a matter of what was your professional
22 judgement?
23 A. Some battles you fight. The work is being undertaken,
24 whether I put high in there on a priority -- a red, but
25 the work is still being undertaken.

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1 Q. Do you accept that, in giving in to them, you
2 compromised your role as an independent fire risk
3 assessor?
4 A. No.
5 Q. Now, 2017, let's go into that year.
6 In your second witness statement at page 21
7 {CST00030186/21}, I would like to look with you, please,
8 at paragraph 80(i), under the heading "Self closing
9 devices". You say:
10 "As far as I can recall, the advice I gave in
11 relation to self-closing devices extended to altering
12 the highlighted text shown in {CST00002235} and
13 {CST00002371}, which are referred to in the Request."
14 Let's look at those two documents.
15 First, please, {CST00002235}.
16 Now, it's got no date on it, but it appears to
17 relate to the TMO and RBKC's decision to instigate
18 a five-year programme to retrofit self-closing devices
19 to nominally fire-rated flat entrance doors where there
20 were none present.
21 Are you able to date this document?
22 A. No, sorry.
23 Q. Let's look at the second one then, {CST00002371},
24 please.
25 That's entitled "Tenants flat entrance door --

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1 priorities for self-closer programme".
2 Are you able to date that document, do you think?
3 A. No, sorry.
4 Q. Let's go back, then, to the first one, {CST00002235}.
5 We can see at the bottom of the screen on page 1
6 some green text. Is the text in green your intended or
7 proposed alteration or by way of addition?
8 A. Categorically I can't say yes or no.
9 Q. Right. It looks as if it was in respect of maintenance,
10 or rather inspection, at least, of self-closing devices.
11 A. Yes.
12 Q. And it looks as if you've added that there should be
13 an inspection of the self-closing device before any new
14 occupant moves in; yes?
15 A. Yes.
16 Q. And on any flat entrance door before any tenant moves
17 into a dwelling.
18 A. Yes.
19 Q. I'm not sure I see the difference between the two.
20 A. One's a temporary accommodation --
21 Q. Oh, I see, right. There is a difference between the
22 kinds of accommodation?
23 A. Yes.
24 Q. Then over the page on page 2 {CST00002235/2}:
25 "When undertaking reviews of the buildings Fire Risk

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1 Assessments the working condition of a number of flat
2 entrance doors self closing devices are checked to see
3 that the device works correctly and has not been
4 disconnected."
5 You added that, did you? It looks like you did.
6 A. Probably, yes.
7 Q. So it looks like this was your proposal in respect of
8 inspection and maintenance of self-closing devices; yes?
9 A. Would seem to be, yes.
10 Q. Also 4.7:
11 "When internal checks of a building are undertaken
12 as part of the TMOs Health and Safety policy, part of
13 the procedure is to sample flat entrance doors self
14 closing devices to see that the work correctly and have
15 not been disconnected."
16 Again, that was your recommendation for inspection
17 and maintenance of self-closing devices; yes?
18 A. It appears, yes.
19 Q. Yes.
20 Now, if we scroll up to page 1 {CST00002235/1}
21 again, and look at this section, this doesn't only
22 relate to sheltered dwellings, does it?
23 A. No.
24 Q. I know you can't date the document, but are you able to
25 tell us whether it predates or postdates the LGA guide

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1 which was published in August 2011, do you know?
 2 A. I can't say that.
 3 Q. You can't say.
 4 Did you know that in January 2016, LFB had advised
 5 the TMO at a bi-monthly meeting on 5 January of that
 6 year that carrying out checks on self-closers when
 7 properties became void would not in itself be considered
 8 by the LFB to be a sufficient level of checking? Did
 9 you know that?
 10 A. It doesn't spring to mind, no.
 11 Q. Right.
 12 Were you aware that Janice Wray had originally
 13 proposed two programmes, first a retrofitting of
 14 self-closing devices and secondly the regular inspection
 15 and maintenance of all self-closing devices to ensure
 16 that they remained connected and functioning correctly?
 17 A. It would not surprise me, but I'm not familiar with it.
 18 Q. Did you know that that had arisen because of the
 19 discussions with the LFB after the Adair Tower fire?
 20 A. It doesn't surprise me.
 21 Q. Right.
 22 Did you provide any advice specifically to
 23 Janice Wray or anybody else at the TMO or indeed RBKC
 24 about either of those two proposed programmes?
 25 A. I'm not, no, not aware of.

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1 Q. Now, can we go to {TMO00840770}.
 2 This is a note prepared by Janice Wray on
 3 1 March 2017 for a JMT meeting, and it's entitled:
 4 "Installation of self-closing devices on flat
 5 entrance doors for discussion."
 6 Is this a document that you saw at the time, do you
 7 think?
 8 A. I don't know what a JMT meeting is, please.
 9 Q. Joint management team.
 10 A. Sorry, sir.
 11 Q. Is this a document that you've seen at the time?
 12 A. I can't say I've seen it, I don't know, sir.
 13 Q. Let's just see how we go with it. We can probably take
 14 it quite quickly.
 15 Can we go, please, to page 3 {TMO00840770/3} and
 16 look at 7, "Costing of a self-closer installation
 17 programme":
 18 "Our Fire Risk Assessor considers it likely that at
 19 least 50% of the stock already has self-closing devices
 20 fitted, however, accurate information on the precise
 21 location of all of these doors is not currently
 22 available.
 23 "The possibility of adopting an installation
 24 programme has been investigated and indicative costings
 25 are set out below ..."

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1 Then you can see on the left-hand side of the box
 2 "Programme" and on the right-hand side of the box
 3 "Cost". Do you see that? And the cost for installation
 4 programme for total stock she estimates at £619,000.
 5 My question is this: were you involved, do you
 6 recall, in assisting her with compiling these
 7 assumptions and these figures?
 8 A. I would not have been involved with the figures. If
 9 I was asked a question on — as bland as how many
 10 self-closers do you think are operational or something,
 11 I might have asked that, but I wouldn't have known what
 12 it was for and I would definitely not have known
 13 costings.
 14 Q. So that was the limit of your involvement, was it?
 15 A. I presume so.
 16 Q. In this exercise.
 17 A. I can't remember even this exercise, sir.
 18 Q. If we go, please, to {TMO00863960/3}.
 19 This is on the subject of installation, a programme
 20 for installation, as opposed to inspection and
 21 maintenance.
 22 You can see an email on 4 May 2017 from Janice Wray
 23 to you, and if we turn to page 4 {TMO00863960/4}, we get
 24 the bulk of it. She says:
 25 "Please see below from Alex. We have agreed with

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1 RBKC that we will instigate a 5-year self-closer
 2 installation programme on tenanted flats — so it seems
 3 that Alex has been asked to do some work on this. As
 4 per his e-mail would you be able to give us a steer as
 5 to how best to prioritise our properties for this
 6 programme?"
 7 At page 3 {TMO00863960/3}, if we scroll up to that,
 8 please, we will see your response on 10 May 2017, just
 9 a month before the fire, saying:
 10 "My first thoughts are that the buildings where the
 11 Masdors were fitted should be compliant, these were all
 12 self closing fire rated doors.
 13 "There will only be the leaseholder flats to look at
 14 in these buildings, I am assuming that leaseholder doors
 15 will be outside of the scope of the works involved?
 16 "So these premises could be struck off the list of
 17 buildings.
 18 "All premises fitted with manse masterdors removed
 19 from the list."
 20 Then you go on down the email to deal with sheltered
 21 schemes, and then you give a seven-paragraph or priority
 22 list of approach, starting with tower blocks or
 23 buildings over six storeys, then you go down that, five
 24 to six floors, three to four floors, two floors, and
 25 then flats accessed from open staircases, flats accessed

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1 from open external walkways, flats accessed from open
2 external walkways and balconies.

3 Now, then you say, "On going", let's look at that:

4 "As part of all on going maintenance checks of
5 properties the flat entrance doors are checked to see
6 that the self closing devices are fitted and that they
7 work correctly, this is all doors including the manse
8 masterdors.

9 "It is a given that all new flat entrance doors
10 fitted by the TMO should be self closing 30 minute fire
11 rated doors fitted with intumescent strips and cold
12 smoke seals."

13 First, let's just look at the advice you give at the
14 beginning, that Masterdor doors could be removed from
15 the list. Why was that?

16 A. Because my understanding is there was not an issue or
17 problem with the Masterdors.

18 Q. But by May 2017 you knew that self-closing devices were
19 being removed from doors, including the Masterdor doors,
20 and therefore such doors were not, at least for that
21 reason, compliant with the Building Regulations.

22 A. But they were being removed.

23 Q. Yes. The fact that they were being removed didn't mean
24 that they shouldn't be inspected to make sure that they
25 were there and working.

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1 A. Sorry, the first part's not about inspection, is it?

2 The first part is about installation. Sorry, have
3 I missed that?

4 Q. Well, maybe, maybe not, but what you're responding to is
5 Janice Wray saying that she's agreed that there will be
6 a five-year self-closer installation programme on
7 tenanted flats. So is it right that you're removing
8 Masterdor, to be clear, because the Masterdors were
9 already fitted with self-closers?

10 A. Yes.

11 Q. Isn't the problem with that that although they were
12 fitted, you knew by May 2017 that even though
13 self-closing devices had been fitted because they came
14 with the Masterdor when installed, residents were in the
15 habit of disconnecting them or they broke?

16 A. But this was the installation programme, so we knew that
17 they were already on those doors. That would be covered
18 in the maintenance programme, which is later on.

19 Q. I see. Right, so you're saying or you understood that
20 there would be a separate list, one list for
21 installation and one list for inspection?

22 A. Yes.

23 Q. I follow.

24 Now, turning to the "On going":

25 "As part of all on going maintenance checks of

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1 properties ... to see if the self closing devices are
2 fitted and that they work correctly ... "

3 Did you check that with anyone?

4 A. This is a proposal, I believe, from reading this here --
5 I mean, I can't remember writing this, but this is
6 a proposal, isn't it, this is ongoing and what's going
7 to happen?

8 Q. I see. So at that stage, is that right, that you
9 understood that there was at that point no ongoing
10 maintenance checks of properties to make sure that the
11 self-closing devices were fitted and that they worked
12 correctly?

13 A. This is ongoing, so this is in hand as it --

14 Q. Right.

15 Who did you understand was at that time carrying out
16 the ongoing maintenance checks?

17 A. The caretakers. When the flats were occupied or vacant
18 or work was undertaken within a flat, it would be
19 checked at those times.

20 Q. Right.

21 If we look at Janice Wray's response the same day,
22 page 2 {TMO00863960/2}, you can see that she says:

23 "Thanks ... really helpful. Couple of queries ... "

24 The first is:

25 "1. Think we still need to inspect the manse

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1 masterdor flats as they may have been disconnected ...
2 but appreciate they will be down the list of priorities .
3 Bearing this in mind where would you put them on your
4 prioritised list ."

5 If we look at your response to that, on the top of
6 page 1 {TMO00863960/1}, on 12 May, two days later,
7 Mr Stokes, you say:

8 "All premises fitted with manse masterdors removed
9 from the list ."

10 Now, although in your first email, as you pointed
11 out, you were dealing with installation and not
12 inspection, Janice Wray picks up the point that I was
13 putting to you and you respond nonetheless, "All
14 premises fitted with manse masterdors removed from the
15 list ."

16 Were you not concerned that the self-closing devices
17 might have been removed from previously fitted Masterdor
18 doors?

19 A. Well, I'm still thinking that this is installation .

20 Q. But why, given the terms of Ms Wray's question to you?

21 A. Can I see Ms Wray's question back to me, please?

22 Q. Yes. Can we go back to page 2 {TMO00863960/2}, please.
23 I'll repeat it:

24 "Think we still need to inspect the manse masterdor
25 flats as they may have been disconnected ... but

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1 appreciate they will be down the list of priorities .
 2 Bearing this in mind where would you put them on your
 3 prioritised list ."
 4 So she is asking you — we can read the question,
 5 but my understanding of the question is that she is
 6 asking you to prioritise the Manse Masterdors in the
 7 inspection list ?
 8 A. Yes, looking at it like that, I agree.
 9 Q. So why did you come back and say "remove"?
 10 A. I can't answer that question.
 11 SIR MARTIN MOORE—BICK: Mr Millett, I think if you read this
 12 run of emails in full , there's a certain degree of
 13 misunderstanding that becomes apparent.
 14 MR MILLETT: Well, I think that's now become apparent.
 15 SIR MARTIN MOORE—BICK: Mr Stokes has explained that he was
 16 distinguishing between new installation and ongoing
 17 inspection and maintenance. It looks as though that was
 18 his perception in his response also to Ms Wray.
 19 MR MILLETT: Well, that's what I'm —
 20 SIR MARTIN MOORE—BICK: Yes.
 21 MR MILLETT: That is what it looks like, Mr Chairman —
 22 SIR MARTIN MOORE—BICK: It does.
 23 MR MILLETT: — and that's what I'm seeking to understand.
 24 SIR MARTIN MOORE—BICK: Yes. Well, I think we can
 25 understand that from the documents, actually, when you

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1 just read them as a run.
 2 MR MILLETT: Well, if you think that I have covered this
 3 satisfactorily , I will leave it there.
 4 Mr Chairman, I'm not quite sure I have, but I just
 5 wanted to know —
 6 SIR MARTIN MOORE—BICK: You can always come back to it.
 7 MR MILLETT: I can come back to it. I've got —
 8 SIR MARTIN MOORE—BICK: I'm afraid we will have to ask
 9 Mr Stokes to come back again, won't we?
 10 MR MILLETT: We will. I've got about a page left of
 11 questions before we really do come to a very new topic.
 12 SIR MARTIN MOORE—BICK: I think probably we have all had
 13 enough for one day, to be honest.
 14 MR MILLETT: Well, I'm sure Mr Stokes has, even if the panel
 15 is still itching for more answers.
 16 Let's call it a day, and we'll come back on Tuesday.
 17 SIR MARTIN MOORE—BICK: I think we should.
 18 For Mr Stokes' benefit, can you give us any
 19 indication of how much more time you may need to have
 20 with him? I'm going to have to ask him to come back on
 21 Tuesday, this time, Mr Stokes, because we're not sitting
 22 on Monday, we're all going to enjoy a Bank Holiday.
 23 Should he expect to be here all day?
 24 MR MILLETT: I think expect to be here all day, but at the
 25 moment, on current pace, I am confident, within the

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1 bounds of reasonableness, that we will finish on Tuesday
 2 with Mr Stokes' evidence.
 3 SIR MARTIN MOORE—BICK: Right.
 4 Well, we don't give you any undertaking, Mr Stokes,
 5 you probably realise that, but there is at least
 6 a chance that you will finish on Tuesday, but I do have
 7 to ask you to come back then to answer some more
 8 questions.
 9 THE WITNESS: Certainly.
 10 SIR MARTIN MOORE—BICK: And I do have to remind you, as
 11 I have on each previous occasion, not to talk to anyone
 12 about your evidence or anything to do with it over the
 13 weekend.
 14 THE WITNESS: Sir.
 15 SIR MARTIN MOORE—BICK: All right, thank you very much.
 16 THE WITNESS: Thank you, sir.
 17 SIR MARTIN MOORE—BICK: If you go with the usher, we'll look
 18 forward to seeing you again on Tuesday.
 19 (Pause)
 20 SIR MARTIN MOORE—BICK: Right, Mr Millett, it will be
 21 10 o'clock on Tuesday.
 22 MR MILLETT: Yes, and I wish the panel a very good
 23 Bank Holiday weekend.
 24 SIR MARTIN MOORE—BICK: And you as well, I hope.
 25 Thank you. 10 o'clock on Tuesday, then.

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1 (4.35 pm)
 2 (The hearing adjourned until 10 am
 3 on Tuesday, 1 June 2021)
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