



GRENFELL TOWER INQUIRY RT

Day 270

April 28, 2022

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1 Thursday, 28 April 2022
2 (10.00 am)
3 SIR MARTIN MOORE-BICK: Good morning, everyone. Welcome to
4 today's hearing. Today we're going to hear evidence
5 from more of those who were involved in the response of
6 the council to the disaster.
7 Yes, Mr Keating.
8 MR KEATING: Good morning, Mr Chairman. Good morning,
9 members of the panel.
10 Could I call Stuart Priestley, please.
11 SIR MARTIN MOORE-BICK: Thank you.
12 MR STUART PRIESTLEY (affirmed)
13 SIR MARTIN MOORE-BICK: Thank you very much. Do sit down
14 and make yourself comfortable.
15 THE WITNESS: Thank you.
16 Questions from COUNSEL TO THE INQUIRY
17 MR KEATING: Good morning, Mr Priestley. Thank you very
18 much for attending today and assisting the Inquiry with
19 its investigations.
20 Just a few introductory matters, as we say to all
21 witnesses, but just to perhaps assist you.
22 First of all, audibility. I will keep my voice up.
23 Any difficulties hearing me, please do let me know.
24 Secondly, if you could reciprocate and keep your
25 voice up as well so that your evidence can be captured

1

1 by the transcriber.
2 If at any stage anything I ask is unclear, just let
3 me know and I'm sure we can rephrase that.
4 Secondly, if I could ask you to avoid shaking or
5 nodding your head because it's not captured by the
6 transcriber also.
7 Lastly, if you need a break for any reason at any
8 stage, just let us know and I'm sure we can accommodate
9 that.
10 Is that okay?
11 A. That's fine, thank you very much.
12 Q. Just turning to your evidence, again, a few formal
13 matters.
14 You have provided three witness statements to
15 the Inquiry in relation to this aftermath module. They
16 will appear on the screen.
17 First, could we go to {RBK00035672}, please. This
18 is a statement dated 28 January, and if you could go to
19 page 14, please, we see your name and the date.
20 Can you confirm that's your signature?
21 A. That's correct.
22 Q. Thank you.
23 If we could move to your second statement, which is
24 dated 26 June 2020, that's {RBK00058265}, please.
25 Again, we can see that it's labelled "Second witness

2

1 statement".
2 Again, if we could go to page 13, please, and the
3 bottom of the page, and if you could confirm that's your
4 signature, please?
5 A. That's correct.
6 Q. Finally, your third statement, {RBK00068073}, that's
7 dated 3 November 2021, described as "Supplementary
8 witness statement".
9 If we could go to page 5, please, we can see the
10 date, and again, can you confirm that that's your
11 signature?
12 A. That's correct.
13 Q. Excellent.
14 Have you had the opportunity to read those
15 statements recently?
16 A. Yes, I have.
17 Q. Can you confirm that their contents are true to the best
18 of your knowledge?
19 A. Yes, they are.
20 Q. Thank you very much.
21 Mr Priestley, I'm just going to turn briefly to
22 background and qualifications, which are set out in your
23 witness statements.
24 I would like to ask you a few questions about your
25 role within the Royal Borough of Kensington and Chelsea,

3

1 RBKC. Is it right that you joined there in 2002 as part
2 of their community safety team?
3 A. That's correct.
4 Q. And in November 2014, you became the chief community
5 safety officer; is that right?
6 A. That's right.
7 Q. And, in essence, you would work within that organisation
8 and with external partners and residents to reduce crime
9 and antisocial behaviour.
10 A. That's correct, yes.
11 Q. At that time, you reported to Tony Redpath.
12 A. That's right.
13 Q. And he was the director of strategy and local services.
14 A. Yes.
15 Q. Through your role, you had responsibility for managing
16 David Kerry; is that correct?
17 A. That is correct, yes.
18 Q. And he was the contingency planning manager within the
19 contingency planning unit.
20 A. Yes.
21 Q. In relation to that unit and those plans, is it right
22 that, in relation to drafting of any contingency
23 management plans, that was something that you had no
24 dealings with and it was done by David Kerry and his
25 team?

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1 A. That's correct. The expertise lay with David and with
 2 his team, so I relied on their subject matter expertise
 3 in the drafting of plans.
 4 Q. In terms of your role when becoming chief community
 5 safety officer in November 2014 and having the
 6 contingency management team fall under your umbrella of
 7 leadership, did you have any background or experience in
 8 contingency planning prior to then?
 9 A. No, none.
 10 Q. Is it right that, as you set out in your statements, you
 11 were trained as a Council Silver in July 2015?
 12 A. That's correct.
 13 Q. And we've heard already that the role of Council Silver
 14 is effectively the tactical manager of the council
 15 response in an incident; is that right?
 16 A. That's my — yes, that's correct.
 17 Q. We've heard a few different terms for Council Silver,
 18 but is it the same that equates to the borough emergency
 19 controller?
 20 A. Yes.
 21 Q. But perhaps we could use Council Silver going forward;
 22 is that okay?
 23 A. Yeah, that's fine.
 24 Q. You also outline in your statement two training sessions
 25 you undertook in late 2015 for that role of

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1 Council Silver.
 2 Could I ask this: did you have any specific training
 3 as to how the borough emergency control centre operated?
 4 A. As part of the briefing of Council Silver, I was
 5 orientated around the functions of the borough emergency
 6 control centre and how it would operate. So that was
 7 included in the briefing — the original
 8 training/briefing session I had with Keith Robins in,
 9 I think that was, 2015.
 10 Q. Correct.
 11 A. Yes.
 12 Q. So there was this orientation as to how a BECC would
 13 operate, but was there any specific training in relation
 14 to the BECC that you received?
 15 A. No, not specific to the BECC.
 16 Q. So there was a couple of events you mention in 2015 in
 17 your statements as to your training as to
 18 Council Silver.
 19 A. Yes.
 20 Q. Was that the extent of your training prior to June 2017
 21 for the role of Council Silver?
 22 A. That's correct.
 23 Q. Did you have any training in the London Resilience
 24 Partnership plans, such as the London strategic
 25 co-ordination protocol or the London humanitarian

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1 assistance plan?
 2 A. Not training, no.
 3 Q. Had you awareness of those prior to June 2017?
 4 A. I was aware of their existence. I think I'd looked at
 5 them in the past, prior to June 2014(sic), but
 6 I couldn't say that I had a detailed understanding —
 7 anything like a detailed understanding of those plans.
 8 Q. Did you consider that you had sufficient training to
 9 undertake the role of Council Silver as of June 2017?
 10 A. As of June 2017, yes.
 11 Q. Looking back now, with the benefit of hindsight, do you
 12 think you had sufficient training of Council Silver?
 13 A. My understanding is that that Council Silver role has
 14 developed since then, and I think the — that the
 15 training that the local authority provides in relation
 16 now to Council Silver is markedly different to the
 17 training that I received. So I think the trainer —
 18 I think it's considerably different now, the level of
 19 training, the detail that's provided, than the training
 20 that I had experienced at the time.
 21 Q. I'm going to move on to a topic regarding training in
 22 a little bit more detail, if I may.
 23 Were any concerns expressed to you from within the
 24 contingency planning unit regarding the sufficiency of
 25 training undertaken by RBKC in relation to the

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1 exercising of the contingency management plan?
 2 A. Concerns were expressed that there were not sufficient
 3 number of staff that were recruited in to emergency
 4 roles, so that was a concern which was relayed to me.
 5 Specifically in regards to training, I don't recall
 6 any concerns being flagged around the training, but
 7 I think they are — those two areas are linked, the kind
 8 of staff that you would recruit and then you would
 9 sort of train up following that.
 10 Q. We've heard evidence regarding concerns expressed
 11 regarding a significant shortage of staff who were
 12 experienced and trained —
 13 A. Yes.
 14 Q. — in emergency planning and work; is that correct?
 15 A. That's correct, yes.
 16 Q. Just regarding the sufficiency of exercise or training
 17 undertaken, perhaps if I show you a document that might
 18 assist you.
 19 If we go to {RBK00058170}, please. This is
 20 a statement from Rebecca Blackburn. If we could go,
 21 please, to page 9 {RBK00058170/9}, and if we look at
 22 paragraph 2.21, please, this is where, just to give some
 23 context, Rebecca Blackburn was asked some questions
 24 regarding raising the issue as to training with her
 25 superiors, and concerns.

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1 A. Yeah.
 2 Q. The answer here — this is to give you the opportunity,
 3 if this assists your recollection — she sets out in her
 4 statement at paragraph 2.21:
 5 "I raised the issue verbally with RBKC Director of
 6 Strategy and Local Services Tony Redpath ...
 7 Stuart Priestley and Stuart Priestley's predecessor.
 8 I am unable to recall the name of Stuart Priestley's
 9 predecessor. I recall that I raised the matter with
 10 Stuart Priestley quite soon after he assumed office ...
 11 I am otherwise unable to recall specifically when these
 12 occasions would have been."
 13 She then goes on:
 14 "I informed all three of them of my concerns about
 15 the failure to conduct sufficient large-scale emergency
 16 evacuation plans outside of the LLAG/LFB London Local
 17 Authority Training and Exercising Programme to test the
 18 Contingency Management Plan, and my doubts that
 19 Contingency Planning Manager David Kerry would have been
 20 able to cope."
 21 Let's deal with the first part of paragraph 2.22
 22 regarding those concerns regarding conducting sufficient
 23 large-scale emergency plans.
 24 Does that aid your recollection?
 25 (Pause)

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1 A. I can't say I have a recollection of the concerns about
 2 training being specific to a large-scale emergency
 3 evacuation. My memory is that there were concerns that
 4 we didn't have enough staff who were trained to be able
 5 to fill the emergency roles. I'm afraid — and I'm
 6 doing my best to think — I cannot recall that being
 7 linked to a large-scale emergency evacuation, but —
 8 Q. Or test — forgive me.
 9 A. But because I'm unable to — no, I'm not saying that
 10 didn't happen.
 11 Q. Let's deal with the last part of paragraph 2.22.
 12 Were there any concerns raised by Rebecca Blackburn
 13 with you regarding doubts as to David Kerry being able
 14 to cope?
 15 A. There were, on several occasions, concerns raised by
 16 Rebecca about David's performance and about differences
 17 of opinion. I ... different — professional differences
 18 of opinion. I don't recall anything about his ability
 19 to cope.
 20 I think that Rebecca was concerned about a number of
 21 things to do with David, and I think there was a — they
 22 had a poor relationship, they didn't get on, there was
 23 a personality clash and there was a difference of
 24 professional opinion at times, and ... but I don't
 25 recall anything about David's ability to cope.

10

1 Q. You allude to an issue between David Kerry and one of
 2 his members of staff in your statement —
 3 A. Yes.
 4 Q. — regarding having issues as to their working
 5 relationship. Was that Rebecca Blackburn?
 6 A. That's correct.
 7 Q. Okay.
 8 I'm going to move on, please, to your operational
 9 experience. You've helped us with your training as
 10 Council Silver.
 11 Prior to June 2017, did you have any experience of
 12 performing the role of Council Silver in an emergency?
 13 A. No.
 14 Q. With no background in this field or experience in this
 15 field, and without the BECC training we discussed, did
 16 you consider that you were equipped to carry out that
 17 role of Council Silver on 14 June 2017?
 18 A. Yes, I do.
 19 Q. You say, "Yes, I do"; so even now, looking back, do you
 20 consider that you were equipped to deal with matters on
 21 14 June 2017?
 22 A. Based on the standards of training and briefing, I'd
 23 undertaken the training and the briefing, I'd
 24 participated in exercises, I'd participated as
 25 a Council Silver within an exercise, so I think given

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1 the — given, I suppose, for want of a better
 2 description, the standards of the time, or certainly the
 3 standards within that authority at that time, that would
 4 indicate that I was equipped to perform that Silver role
 5 on that time.
 6 Q. Asking the question slightly differently —
 7 A. Yeah.
 8 Q. — did you feel comfortable in carrying out that duty on
 9 14 June, bearing in mind the experience and training you
 10 had?
 11 A. No.
 12 Q. Why did you not feel comfortable?
 13 A. I was inexperienced. That was the first incident I'd
 14 ever been involved in in a response.
 15 Q. I'm going to move on now to events on 14 June.
 16 The first heading really would be the notification
 17 of the incident and setting up the BECC —
 18 A. Yes.
 19 Q. — if that's okay.
 20 You've helpfully set this out in your statements,
 21 and with the benefit of your log, which you prepared
 22 a few days after the event, isn't that correct, which
 23 we'll touch upon in due course.
 24 So the first reference you make — it's around
 25 paragraph 14 of your statement {RBK00035672/4} — you

12

1 say at around 3 o'clock you received the first
 2 notification of the fire from David Kerry in a telephone
 3 call; is that right?
 4 A. That's correct.
 5 Q. What did he say to you?
 6 A. He said that there was a fire in a tower block, and he
 7 said that the Fire Brigade were present, he'd
 8 discharged — sent a LALO, and he said — I asked him
 9 what I should do, and he said that at the moment
 10 I should just wait.
 11 Q. Okay.
 12 Perhaps we could open up paragraph 14 of your first
 13 statement, please, {RBK00035672/4}, please. Thank you.
 14 So the first line we have just touched upon, and if
 15 we move down to four lines down, you say:
 16 "He said that it was unclear at this point what the
 17 situation was. He did not say that it was a major
 18 incident. It was agreed between us that I would monitor
 19 the situation from home until further information was
 20 available."
 21 Is that correct?
 22 A. That's correct, yes.
 23 Q. After that phone call, is it the case that you then
 24 logged on to your work email — you were awake, you
 25 logged on to your work email, and you read an email sent

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1 at 02.20 from a former fire borough commander which
 2 stated that, "you have a massive fire, Grenfell Tower",
 3 and included photographs of the fire?
 4 A. That's correct.
 5 Q. And once you received that email and accessed that
 6 material, what did you do then?
 7 A. I emailed that to David, and suggested, I think in the
 8 email, that this was significant and it needed
 9 a significant response. I'm sorry, I can't recall the
 10 detail of the email, but I sort of — I gave him to
 11 believe that — I was — I said to him that I needed to
 12 go into the BECC, I think. I think it was a — in that
 13 email or around that time. It was a recognition that
 14 I recognised that it was more significant than he'd
 15 given me the impression or that he had the impression at
 16 that time.
 17 Q. Let me assist you in relation to this. We've got
 18 paragraph 16 of your statement {RBK00035672/4}, which is
 19 there, and you indicate that:
 20 "It was apparent from [the] email that the fire was
 21 large in nature and that we should initiate our
 22 processes to establish the BECC in the Town Hall with
 23 appropriate staffing arrangements. I immediately called
 24 David but could not get through. At 3.10am I forwarded
 25 Rob's email to David stating: 'David, can you call me

14

1 back. I think we need to contact all now including the
 2 Councillors. Need to chat."
 3 Is that correct?
 4 A. That's correct.
 5 Q. So we know from other evidence that David Kerry had been
 6 informed at 02.21 of the fire and the emergency. Did
 7 you think that Mr Kerry, from your initial contact, had
 8 appreciated the seriousness of the fire?
 9 A. Not in my initial contact with him, no.
 10 Q. You go on in your statement at paragraph 19
 11 {RBK00035672/5} — we don't need to look at it — that
 12 you made a number of attempts to call Mr Kerry and,
 13 perhaps understandably, his line was engaged, and at
 14 some time perhaps around 3.30/3.45, you got in contact
 15 with him again; is that correct?
 16 A. That's correct.
 17 Q. What was discussed when you got in contact with him for
 18 that second occasion?
 19 A. I think the contents of the email, really, that we
 20 should enact the plan, contingency plan, and call in
 21 staff to the Town Hall, and work to transfer the BECC
 22 from Mr Kerry, from his home and from him, into the
 23 Town Hall, and that senior managers and BECC emergency
 24 staff should be contacted and advised to go to the
 25 Town Hall, and that I would get ready. I think in one

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1 of my emails I said — or my log, I'd jump in the
 2 shower, get ready, call a taxi, and I would journey to
 3 the Town Hall.
 4 Q. So you're describing a full activation of the plan and
 5 an opening of the BECC in the Town Hall?
 6 A. That's correct.
 7 Q. It may be obvious, what was the rationale for that
 8 decision at 3.30 in the morning?
 9 A. The email from Rob Davies which said, "you have
 10 a massive fire", and the photographs were quite shocking
 11 and upsetting.
 12 Q. You set out in your statement that you arrived at the
 13 Town Hall at approximately 04.38. I say approximately;
 14 you're actually quite specific. I think you have
 15 checked records.
 16 How long did it take you to access and set up the
 17 BECC when you were at the Town Hall from 4.38 onwards?
 18 A. So the reason why it's 4.38 is because I had — I took
 19 an Uber taxi and they give you the precise timing of
 20 when you start and finish, so I got there at that
 21 precise time.
 22 I then had — the council building, the council
 23 Town Hall, is open 24 hours, but I had difficulties.
 24 I was able to get in and there was a chap behind the
 25 reception desk. I signed in, I explained that — it was

16

1 very unusual for someone to attend the Town Hall in the
2 very early hours of the morning, you'll appreciate.
3 I explained that I was the first and that others would
4 be coming, and I explained that we needed to — that we
5 would be based within the Holland Room, which is a room
6 in the basement, which is where — which is a specific
7 room which can be configured to be the borough emergency
8 control centre.

9 I then wanted to get information or ... I think it
10 was my laptop. I'm slightly confused, because
11 I can't — I think I may have logged on to my work
12 system using my home laptop, but when I got into the
13 Town Hall I needed to go to my locker on the first floor
14 to retrieve my work — proper work laptop. I think —
15 that's my memory of that, and I had issues getting on to
16 the first floor. We have, you know, a fob system, so
17 there was a bit of toing and froing getting up, getting
18 that, and then when I got to the Holland Room,
19 I couldn't get in, and kind of the freedoms and
20 flexibilities that my pass gave me in the day it didn't
21 give me at night and I thought it would give me. So
22 there was a bit of kind of toing and froing.

23 Then I arrived at the Holland Room and I can gain
24 access to the Holland Room, but what I can't do is gain
25 access to the cupboard, which I think is documented,

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1 which then gives you access to these devices which allow
2 the desk to rise, which gives you access to the
3 telephones and the IT and the suite of paper documents
4 that one might need.

5 So I sort of got that far and was unable to go any
6 further.

7 Q. So an important aspect to activate the BECC is to open
8 the cupboard to operate the computers. What was the
9 difficulty in relation to getting the key to the
10 cupboard?

11 A. So I should just say that at this point the BECC is
12 being operated from David Kerry's home.

13 Q. Yes.

14 A. So the BECC, as you'll appreciate, is a kind of concept,
15 it's — you know, you understand what a BECC is. So the
16 difficulty — sorry, could you ask the question again?

17 Q. Of course.

18 A. I'm terribly sorry.

19 Q. I was just really focusing on — you've set out that you
20 weren't really able to have the BECC in the Town Hall
21 and accessing the Holland Room cupboards, and there was
22 a delay in this because you couldn't access the key.

23 A. Yes.

24 Q. I'm just really focusing on that. What was the
25 difficulty in accessing the key?

18

1 A. Oh, that it was — the key was at — supposed to be at
2 the reception, and — the council reception, and they
3 couldn't find it.

4 Q. Did you ever get to the bottom of where the key was?

5 A. No, never.

6 Q. No.

7 As a result of this difficulty, is it the case that,
8 at 5.25, you emailed David Kerry to say that you could
9 not open the cupboard and asked him to come to the
10 Town Hall PDQ?

11 A. That's correct.

12 Q. Is it the case that, because there wasn't a key that
13 could be located within the Town Hall, you had to wait
14 for David Kerry to arrive with a key close to 6 o'clock?

15 A. That's correct.

16 SIR MARTIN MOORE-BICK: Just out of interest, was the key
17 ever located?

18 A. Not to my knowledge.

19 SIR MARTIN MOORE-BICK: It had just gone missing?

20 A. Yes.

21 SIR MARTIN MOORE-BICK: Okay, thank you.

22 MR KEATING: So in terms of opening the BECC, which I know
23 is a concept, but opening the BECC within the Town Hall
24 with that greater infrastructure, there was a delay of
25 about an hour/an hour and a quarter because of not being

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1 able to access the key; is that fair?

2 A. Yes, it is, but for context what I would add to that is:
3 you will only have one BECC operating at any one time,
4 so we were reliant on David stopping being the BECC and
5 the BECC transferring to the Town Hall, and in order for
6 that to be the case, we would sort of need him to
7 physically be there to kind of do that handover, really.

8 So I think my concern in not having the BECC — the
9 Holland Room configured was that that handover was
10 slightly delayed when Mr Kerry arrived at the Town Hall.

11 Q. Let's move slightly further along in the timeline to
12 when Mr Kerry arrives and the key is obtained, BECC
13 opens in the Holland Room, computers are accessed.

14 Were there any initial IT issues with some of the
15 BECC systems which prevented people logging on?

16 A. I wasn't aware of that. I'm aware that that was — came
17 up in evidence yesterday.

18 Q. Yes.

19 A. But I've no recollection of that.

20 Q. Specifically the ILS, the incident logging system, any
21 recollection now of, at the beginning, people having
22 difficulty logging on to the system?

23 A. No, I don't have any recollection of that now.

24 Q. I'm going to move on now to a different topic, which is
25 something you refer to in your statement regarding

20

1 an initial meeting, perhaps not in a formal sense, but
 2 a meeting with Mr Holgate and others.
 3 You state that between 6.30 and 7 o'clock you had
 4 a meeting with David Kerry, Nicholas Holgate,
 5 Laura Johnson and Robert Black at paragraph 24 of your
 6 statement {RBK00035672/6}. Do you recall that?
 7 A. Yes.
 8 Q. Can you assist whether that meeting took place before or
 9 after the 6.30 SCG, strategic co-ordination group, call?
 10 (Pause)
 11 A. I can't recall. Could you help me, what did I say in my
 12 log? Did I ...
 13 Q. You say it's between 6.30 and 7.00, so it's not entirely
 14 clear.
 15 A. Okay.
 16 Q. But we can come back to that if need be. Do you have
 17 any recollection now? We know that you and David Kerry
 18 attended the 6.30 SCG, which would have taken place
 19 for --
 20 A. Yes.
 21 Q. -- a period of time.
 22 A. I think it was before that meeting.
 23 Q. Well, let's focus on the meeting, which you think may
 24 have been before the 6.30 SCG.
 25 Did David Kerry provide you with an update or

21

1 provide Mr Holgate with an update at this meeting?
 2 A. Yes, that's my memory, yes.
 3 Q. What did he say?
 4 A. I think he fed back what he knew in regards the
 5 information that had been provided to him by the LALOs
 6 and the response, and Mr Kerry advised him of the mutual
 7 aid arrangements and the support that was available to
 8 him.
 9 Q. Let's perhaps assist you, because it's some time ago,
 10 and open up paragraph 24 of your first statement
 11 {RBK00035672/6}, please. Thank you.
 12 We see in the first two or three lines what you've
 13 just said, that there was an update provided by
 14 David Kerry as to what had been fed back to the BECC
 15 from the on-site LALOs. I'm not going to read it all
 16 but give aspects to it. We then see, "Nicholas" --
 17 that's Mr Holgate; is that correct?
 18 A. Yes.
 19 Q. "... advised that he had spoken to the Leader and that
 20 we had a 'blank cheque book' to fund anything that we
 21 required in response to the fire. Nicholas confirmed
 22 that the priority should be to offer support to those
 23 directly affected -- food, shelter, clothing, money,
 24 emotional support and emergency accommodation for those
 25 displaced."

22

1 Then this is what you mentioned just a moment ago:
 2 "David [Kerry] advised Nicholas [Holgate] of the
 3 Mutual Aid agreement via London Gold and of the other
 4 Local Authorities CEOs who could support him."
 5 So that was the advice given.
 6 Can you help any more with the nature of the advice
 7 that David Kerry gave?
 8 A. I think it was -- his advice was very brief and factual,
 9 and I think it's covered in this statement. He advised
 10 Mr Holgate of the sources of support to him and the
 11 mutual aid arrangements under London Local Authority
 12 Gold. This was quite a brief meeting.
 13 Q. Let's go to your second statement, because you were
 14 asked further questions by the Inquiry in writing about
 15 this. If we could look at your second statement, which
 16 is {RBK00058265/3}, please, and paragraph 5.1.
 17 So:
 18 "Entry 06:30 [that's the time] of Exhibit SP/1
 19 [that's your log which you did two or three days after
 20 the incident] which is referred to at paragraph 24 of
 21 your statement [that's what we just read a moment ago]
 22 speaks to a meeting on 14 June 2017 where the activation
 23 of mutual aid was discussed."
 24 You're asked:
 25 "Please provide further detail as to the nature of

23

1 the advice on mutual aid given by David Kerry,
 2 specifically did Mr Kerry advise any action be taken?"
 3 Your response in the statement is:
 4 "The Emergency Log Sheet produced by David Kerry ...
 5 covering the early hours and morning of 14 June ...
 6 references the meeting ... at 10:00 attended by
 7 David Kerry ... Laura Johnson, and ... Robert Black."
 8 You produced that log as exhibit SP/2:
 9 "Within the 'Action/Response/Outcome' column is
 10 a corresponding entry ..."
 11 We don't need to go to the log just here because you
 12 have reproduced it helpfully.
 13 Just pausing for a moment. So we're asking you
 14 about the meeting which you believe is at around 6.30,
 15 perhaps before the 6.30 SCG, and when you have been
 16 asked about this in your second statement, you produce
 17 a log in relation to a meeting which Mr Kerry believed
 18 took place at 10 o'clock. Are we talking about the same
 19 meeting?
 20 A. We are, yes.
 21 Q. Okay.
 22 Again, we don't need to go to the log, but this is
 23 what you mention in your second statement regarding what
 24 David Kerry said:
 25 "■ This incident is bigger than any one local

24

1 authority in London can manage.
 2 " ■ Consideration should be given to asking for
 3 mutual aid for the BECC.
 4 " ■ There are people who can support
 5 [Nicholas Holgate] and the ... Gold Group, including
 6 " ■ John Barradell ...
 7 " ■ Eleanor Kelly ...
 8 " ■ Andrew Meek ... London's experts on humanitarian
 9 assistance.
 10 " ■ Alistair Ayres ..."
 11 If I'm pronouncing that correctly.
 12 A. That's right.
 13 Q. Yes.
 14 So pausing there for a moment, is that correct? You
 15 have mentioned that in your second statement. Was that
 16 said, "This incident is bigger than any one local
 17 authority in London can manage"?
 18 A. It was, yes.
 19 Q. What was Nicholas Holgate's response to this stark
 20 advice, that this was an incident bigger than any one
 21 local authority in London can manage?
 22 A. I don't recall him responding directly to that
 23 statement.
 24 Q. Well, if we can go back to paragraph 24 of your first
 25 statement {RBK00035672/6}, please. I'm going to move

25

1 between a few documents, forgive me for a moment. So
 2 your first statement is {RBK00035672/6}, which is just
 3 there, and we can move, please, to paragraph 24 again.
 4 Excellent, thank you.
 5 So we were midway through that document where we
 6 see, "David advised Nicholas of the Mutual Aid", and the
 7 next sentence is:
 8 "Nicholas [Holgate] indicated that the decision to
 9 invoke London Gold mutual aid would be considered when
 10 the Council's response was deemed insufficient."
 11 Does that assist your recollection? That's what you
 12 said in your first statement.
 13 A. It does, actually, yes.
 14 Q. Is that exactly what he said, that the decision to
 15 invoke would be considered when the council's response
 16 was deemed insufficient?
 17 A. I don't know that those were his exact words, but that's
 18 the sense I had.
 19 Q. Okay.
 20 So the documents we've looked at, your first
 21 statement was made some time after, the second statement
 22 even later.
 23 A. Yes.
 24 Q. Let's go to your most contemporaneous document, which is
 25 your log, and that's {RBK00013318}. This is the log

26

1 which you mention in your statement was produced between
 2 16 and 18 June based upon your recollection and notes
 3 you made on 14 June; is that correct?
 4 A. That's correct.
 5 Q. Right.
 6 So if we scroll down, at the bottom of the page is
 7 6.30, this is what you say:
 8 "Meeting with: Robert Black, Laura Johnson,
 9 Nicholas Holgate ... David provided an update ...
 10 advised of the scale of the tragedy."
 11 I'm going to move to the next page {RBK00013318/2}:
 12 "David advised Nicholas of the mutual aid
 13 arrangements available via LLAG and our neighbouring
 14 boroughs. Nicholas stated 'That looks like we can't
 15 cope'. The conversation on mutual aid at that point
 16 ceased."
 17 Does that aid your recollection?
 18 A. It does, yes.
 19 Q. So a few days after this incident, you noted down from
 20 your notes that when David Kerry gave this advice, the
 21 response from the chief executive of RBKC,
 22 Nicholas Holgate, was, "That looks like we can't cope".
 23 A. That's correct. But if I may --
 24 Q. Do, yes, please.
 25 A. Nicholas was also at pains to point out that mutual aid

27

1 was available from the neighbouring boroughs, and that
 2 he'd already spoken to the neighbouring borough chief
 3 executives, and they'd made available any resources that
 4 the council required within its response. So he was --
 5 he had made that point in that meeting, that we could,
 6 in our response, draw on the neighbouring boroughs'
 7 mutual aid, the mutual aid arrangements.
 8 Q. Did it go further than that, though? Was it the
 9 position, actually, that there was a concern at the most
 10 senior level of RBKC that to seek outside help at that
 11 stage would look like a sign of weakness or an inability
 12 to cope?
 13 A. I don't know the answer to that question, because all
 14 that was said was that one sentence. That struck me,
 15 that's why I recorded it. It stayed in my memory. It's
 16 why I've written it here. There's no broader contextual
 17 conversation that occurred in that meeting or outside of
 18 that meeting in the days that followed along those lines
 19 that I was involved in.
 20 Q. In terms of the length of this meeting, it was short,
 21 isn't that correct?
 22 A. That's correct.
 23 Q. You've mentioned this in your second statement, and in
 24 relation to the aspect in discussing mutual aid, you
 25 mention it was two or three minutes in duration.

28

1 A. Yes.
2 Q. But from your perspective, you've got an area which you
3 are not an expert in, you're reliant on David Kerry;
4 isn't that correct?
5 A. That is correct.
6 Q. You've got no operational experience as a Council
7 Silver. You've seen photographs and you're aware this
8 is a very serious incident; isn't that correct?
9 A. That is correct.
10 Q. You're in a room with your chief executives and your
11 contingency management expert, for want of a better
12 word, and he says, "This is too big for any one local
13 authority to cope with". What did you think when the
14 response from your chief executive was, "We'll continue
15 as we are", in effect?
16 A. My thoughts were that we would respond using the
17 resources of the council and our neighbouring boroughs
18 in the first instance.
19 Q. I'm going to move on in a moment, but the last question
20 in relation to this is this: you said that you were
21 struck by the comment, that's why you wrote it down.
22 A. Yes.
23 Q. You yourself, as you said in your statement, didn't
24 contribute to this discussion.
25 A. That's right.

29

1 Q. But were you concerned by this discourse, the advice
2 from David Kerry and the response from Nicholas Holgate?
3 A. I don't think I was concerned.
4 Q. How would you describe how you were feeling?
5 A. I felt that that was the direction, and that we would
6 get on with the job in hand with the resources that we
7 had.
8 Now, I'm pausing because I have to think back to my
9 kind of knowledge around London Local Authority Gold and
10 those processes and what that was at that time, and I'm
11 now — you know, my knowledge has significantly
12 increased around this area and I've lots of experience
13 of being a Council Silver, but I have to try and go back
14 and think about what I was thinking and what I was
15 feeling in relation to that at that time, and what
16 I wasn't thinking was: this is a massive mistake that's
17 being made, Nicholas' judgement is wrong. I wasn't
18 thinking that. I was thinking: we've received
19 a direction, we're going to respond to this within the
20 resources of the council and our neighbouring boroughs.
21 Q. Was there a clear understanding in your mind of what
22 activation of London Local Authority Gold was at that
23 time?
24 A. No. I had an idea that it was — I mean, I think my
25 idea at the time was quite loose, that it would mean

30

1 additional resources from across London, additional
2 strategic leadership. The detail of that, I didn't have
3 a strong sense of that.
4 Q. Finally in relation to this, you mentioned you were
5 going to work to follow the direction which was given by
6 your town clerk at that time.
7 A. Yes.
8 Q. Ultimately a senior leader of the council. Was there
9 a deference to the town clerk and his view at that time?
10 A. I can't speak for others in the room. There was
11 a deference from me, certainly. I was not — I was
12 a middle manager, I was a head of service, and I'd been
13 in that role for a number of years, but I was still
14 learning, so I think that there was a deference from me.
15 I can only speak for me.
16 Q. Thank you.
17 I'm going to move on to the second SCG, strategic
18 co-ordination group, meeting which took place at 6.30.
19 One took place at 5 o'clock —
20 A. Yes.
21 Q. — in the morning. You had confirmed that although
22 you're on the minutes —
23 A. Yeah.
24 Q. — I think you confirmed in one of your later statements
25 that you were not at that meeting and that was an error;

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1 is that correct?
2 A. That's correct.
3 Q. So your first attendance at one of these meetings was at
4 6.30?
5 A. That's correct.
6 Q. You'd been at the Town Hall a short while, David Kerry
7 had been the BECC — the mobile BECC, for want of
8 a better word — and from the time of your attendance,
9 how do you consider your ability to contribute at that
10 stage as to how RBKC were doing?
11 A. Very limited. I didn't contribute at that meeting.
12 I was there very much in listening mode.
13 Q. So it was you and David Kerry. If you were there in
14 listening mode, did it follow that David Kerry was the
15 person who was speaking on behalf of RBKC?
16 A. Yes. I didn't say anything in the 6.30 meeting or the
17 8.30 meeting. At the 6.30 meeting, David Kerry was
18 still Council Silver.
19 Q. I'll move to that in a short while about the timing of
20 Council Silver.
21 A. Yeah.
22 Q. But just sticking with this meeting for a moment, if
23 I may, did you consider from that listening mode you had
24 at that meeting that David Kerry had sufficient
25 situational awareness in relation to the rest centre

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1 locations at that time?
 2 (Pause)
 3 A. No, not fully. I think, if I may, just by way of
 4 context and —
 5 Q. Of course.
 6 A. The Inquiry will be aware that numerous spaces and
 7 places opened up and were operating and delivering
 8 rest centre functions in the morning, and I don't think
 9 that David had knowledge of all of those places.
 10 Q. Let's open those minutes up for a moment. It's at
 11 {MOL00000015}, please. We can see that they're the
 12 minutes there. At 1.2 we can see that:
 13 "RBKC are in the process of consolidating their open
 14 rest centres into only one, which will be located at
 15 W11 1PZ."
 16 Perhaps we can now move to paragraph 3.5, which is
 17 on the other page, top of page 2 {MOL00000015/2}, and
 18 it's the same point but a bit more detail:
 19 "Full contact details to be shared asap."
 20 And it mentions that there are two LALOs, local
 21 authority liaison officers, on scene and they will be
 22 relieved within the hour.
 23 Does it follow that that was an address provided
 24 by — well, let me ask it in an open way: can you recall
 25 who provided that address?

33

1 A. I can't recall who provided that address or who stated
 2 that at that point the rest centres would be
 3 consolidated.
 4 Q. The postcode for W11 and other evidence indicates that
 5 this was St Mark's Close Children's Resource Centre. Do
 6 you recall that being mentioned in the early days on
 7 14 June?
 8 A. Not at all.
 9 Q. Again, you may have touched upon it, but just for
 10 completeness, do you know who made the decision to
 11 consolidate rest centres at that stage?
 12 A. No.
 13 Q. Okay.
 14 In terms of the role of Council Silver — you have
 15 been asked a number of questions in relation to that —
 16 the position was that David Kerry was the Council Silver
 17 when he was at home and operating the BECC; isn't that
 18 correct?
 19 A. Yes.
 20 Q. And then can you assist us, at what stage did the role
 21 of Council Silver pass from David Kerry to you?
 22 A. Shortly after 7 o'clock, on or around 7 o'clock. I sent
 23 an email at — I think it's detailed at 7.01, stating
 24 that the BECC was live in the Holland Room and that
 25 I was Council Silver. Following sending that email,

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1 that's when I had a verbal handover from David.
 2 Q. So this hour period where Mr Kerry had arrived, got the
 3 key, set up the BECC, had the meeting, attended the
 4 first SCG, David Kerry was Council Silver?
 5 A. Yes, that's correct.
 6 Q. And was that something discussed amongst you or was that
 7 assumed by you?
 8 A. That was assumed, and my assumption was that when he
 9 provided me with the handover, it was at that point that
 10 I would take on the role of the Council Silver.
 11 Q. Let's move on to the handover.
 12 At that stage, we've had the second SCG, your first
 13 one, at 6.30. Was there any further discussion
 14 regarding the numbers and locations of rest centres?
 15 A. Yes. In that handover there was some information
 16 about — provided about rest centres and the locations
 17 of those rest centres.
 18 Q. Shall I assist you in relation to that —
 19 A. Please.
 20 Q. — instead of trying to recollect?
 21 A. Please.
 22 Q. We can go to your log. That's at {RBK00013318/2},
 23 please. Thank you very much. I'm just going to find
 24 the reference.
 25 We can see it's the penultimate entry at 7.30,

35

1 thank you. There is a:
 2 "Handover meeting from David to me — brief update in
 3 regard situation on ground ... Rest centres: Rugby
 4 Portobello Trust (RPT), Harrow Club, Clement James
 5 Centre, Westway ... and other locations in the area such
 6 as small churches. Little information as to who is
 7 present and none have been opened via the Council's
 8 [emergency planning team] processes."
 9 Is that correct?
 10 A. That's correct.
 11 Q. We move on:
 12 "Need for rest centre managers to attend the centres
 13 and provide management."
 14 Is that correct?
 15 A. That's correct.
 16 Q. And:
 17 "David advised that the [London Borough of
 18 Hammersmith and Fulham] can provide a rest centre
 19 manager."
 20 A. That's correct.
 21 Q. And then just while we have it in front of us:
 22 "Issue of insufficient number of BECC officers
 23 discussed. Agreed we would need to seek volunteers from
 24 across the Policy and Partnership Unit."
 25 A. That's right.

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1 Q. So this is your log, a few days later, derived from your
2 notes.
3 I just want to sort of unpick some of that, please.
4 Were you informed at that stage that there was no
5 RBKC staff, save those LALOs, which had been deployed to
6 the rest centres?
7 A. I was aware that that was the case.
8 Q. So this is 7.30/8 o'clock. What was your view at that
9 time that no RBKC staff had been deployed to the
10 rest centres some five/five and a half hours after the
11 incident?
12 A. That the council needed to deploy staff to those
13 rest centres.
14 Q. I'm going to ask you a few more questions regarding the
15 detail of this in a moment, but just dealing with
16 handover and logs, you refer to a log you did after the
17 event; were you provided with any log by Mr Kerry that
18 morning —
19 A. No.
20 Q. — on 14 June?
21 A. No.
22 Q. We know in due course that he had a handwritten note;
23 did he provide you with that or any detail in relation
24 to that?
25 A. No.

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1 Q. Were you aware that Mr Kerry had, on his account, set up
2 a BECC log on the computer system when he arrived some
3 time after 6 o'clock in the morning?
4 A. No, I found out about that for the first time yesterday.
5 Q. In terms of the question regarding BECC logs — and, as
6 you said, this was your first incident operationally as
7 a Council Silver — is it right that you yourself, once
8 you became Council Silver, didn't open a BECC log?
9 A. I didn't, no.
10 SIR MARTIN MOORE—BICK: Just help me with this, if you
11 would, Mr Priestley. When you get into the computers in
12 the BECC, does the existence of a log, if one has been
13 opened, not show up in some form or other on the screen?
14 A. I think that you would have — my memory is that one
15 would have to go and find that log. It wouldn't be the
16 case that one would fire up the computer and the log
17 would present itself onto the screen. You'd have to go
18 into a file to access it.
19 I think Mr Kerry said yesterday that it was
20 a SharePoint—produced log, so one would have to go to
21 SharePoint in order to access that, would be my
22 understanding.
23 SIR MARTIN MOORE—BICK: All right, thank you. But it sounds
24 as though no one actually went to see if there was
25 a log. Is that fair?

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1 A. Yes, I think that is fair.
2 SIR MARTIN MOORE—BICK: That strikes me as slightly
3 surprising, but do you know why that was?
4 A. I think that in those first couple of hours that the
5 BECC was established in the Holland Room, it was
6 phenomenally busy. There were lots of people going into
7 that BECC, there was lots of information coming into
8 that BECC, there was lots of requests for information
9 and requests for resources. It was incredibly busy.
10 The BECC staff that were in there were concentrating on
11 answering the phones, responding to issues, and
12 populating the whiteboards with the information.
13 I think that in that environment and that pressure
14 and that pace, they were unable to find the space to
15 create the log and to settle into some of the processes
16 that one might expect within a BECC in usual
17 circumstances. I mean, all incidents are unusual,
18 because of the ... but ... and I think that that
19 environment and that kind of fast-paced, complex,
20 challenging environment, meant that it was some time
21 before the BECC processes stabilised to the point that
22 the log could be established.
23 SIR MARTIN MOORE—BICK: Yes. Thank you.
24 A. That's my strong sense.
25 MR KEATING: So in relation to the BECC, you've described,

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1 to use your term, a challenging environment, fast paced.
2 In terms of trained BECC staff, as we've seen in your
3 note, at that stage there was an insufficient number of
4 BECC officers at that time; is that correct?
5 A. That's correct.
6 Q. The impression is that there were a lot of people there
7 who were trying their best to assist, but perhaps not as
8 familiar with the processes as other trained people
9 would be; is that fair?
10 A. Yes, I think it is. Could I talk in a bit more detail
11 about that? Would that be helpful?
12 Q. Of course.
13 A. So as of 14 June, there were ten trained BECC officers.
14 Two of those officers were on leave, two of those
15 officers were undertaking other response duties — one
16 was a housing officer and one was a communications
17 officer, so they were unable to be in the BECC because
18 they were elsewhere in the response — and one was off
19 sick. So the ten trained staff were immediately reduced
20 to five staff, and ten was insufficient in the first
21 instance.
22 Q. Yes.
23 A. So we then called upon, as I think is reflected in my
24 log, volunteers, who were not trained, to work with
25 those who were trained within the BECC to deliver the

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1 BECC functions.
 2 Q. And that term "volunteers", this is volunteers within
 3 the organisation, RBKC?
 4 A. That's correct, yes.
 5 Q. Yes.
 6 In terms of the environment, it's been described in
 7 evidence by other witnesses as pandemonium. Is that
 8 a fair description, that it was pandemonium?
 9 A. No, I don't think so.
 10 Q. Would you describe it as chaotic in those early hours?
 11 A. No.
 12 Q. No?
 13 A. No, and the reasons — and I thought long and hard about
 14 this and challenged myself over this, based on the
 15 evidence that we've heard recently. At various points
 16 in that first morning it was crowded, it was noisy,
 17 there were too many people in there, that room, at
 18 various points — and I'll talk about that in
 19 a second — but what I saw was purpose, professionalism,
 20 and it was organised and being organised.
 21 At one point I asked everyone to leave the room who
 22 wasn't directly involved in delivering BECC functions,
 23 and that helped. A whole bunch of people left. I think
 24 part of the challenge was that at various points
 25 Nicholas had sort of based — he was in the room, and he

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1 then became the centre for lots and lots of managers and
 2 lots of senior managers wanting to speak to Nicholas.
 3 So there were lots of conversations at various points in
 4 that room that really should have been had outside of
 5 that room. It's just that Nicholas was in that room.
 6 So I do recall — I have a strong memory of clearing the
 7 room, saying, "If you do not have a BECC responsibility,
 8 please leave this room, there's lots of other rooms you
 9 can go to to have conversations", and everyone left, and
 10 then I do remember the senior manager from adult social
 11 care coming back to me and saying, "I've just removed
 12 all of the link officers, I think they should be in the
 13 BECC", to which I replied, "Yes, they should be".
 14 I didn't actually mean the link officers, I just meant
 15 everybody else in the room who was having conversations.
 16 So I can think that someone walking past that
 17 meeting — that room, with this door open, with all of
 18 that noise in it, might think that that's pandemonium.
 19 They might think it's chaos. But, actually, the
 20 business of the BECC that's going on whilst all of that
 21 noise is happening was, as I say, purposeful and
 22 professional. That's what I saw.
 23 Q. So in terms of timeline, we've got this handover, 7.30
 24 to 8 o'clock approximately. We know that there was the
 25 third SCG meeting at 08.30, and you, together with

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1 Rebecca Blackburn, Nicholas Holgate, attended that
 2 meeting; is that correct?
 3 A. Yes.
 4 Q. In fact, it was Rebecca Blackburn, Nicholas Holgate,
 5 David Kerry and Tony Redpath, so quite a few of the
 6 contingency management team, plus two senior members,
 7 Mr Holgate and Mr Redpath, were at the next meeting,
 8 participating by telephone; is that correct?
 9 A. That's correct.
 10 Q. Did you consider that left a gap in terms of leadership
 11 in the BECC at that time?
 12 A. I think that — I didn't think that at the — I didn't
 13 think that initially. I think that now, and I think
 14 that was a mistake.
 15 Q. Just to help you in terms of timeline, so this meeting
 16 was at 8.30, just prior to that meeting you received
 17 an email which I'd like you to have a look at, and you
 18 respond to that email. So rather than bring up two
 19 documents, I am going to bring up the response which has
 20 the thread.
 21 So if we look at {RBK00004087}, please, and if we
 22 focus at the bottom, please. So this is the first email
 23 which you received. It's from Jonathon Toy, and it's
 24 addressed to you:
 25 "Hi Stuart, hope you are ok.

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1 "I just wanted to offer my assistance if you need it
 2 in relation to the above horrendous tower block fire.
 3 I was one of the lead officers in dealing with the
 4 Lakanal Fire which claimed 6 lives. I wasn't only
 5 involved in the operational managements and issues which
 6 lasted many many weeks, but also the strategic work that
 7 we had to put in over the many months/years after.
 8 "There was an enormous amount that we had to do as
 9 a council, so if any of my experience can help you
 10 please let me know."
 11 He gives his details there.
 12 Being fair to you, a lot going on at that time,
 13 meetings and everything else; can you recall seeing this
 14 email at the time?
 15 A. No, I didn't see that email at the time.
 16 Q. If we scroll up, please, you do respond on 17 June, so
 17 this is the Saturday, the weekend, 12.17:
 18 "Hi Jonathon,
 19 "Many thanks for the email and kind offer [which]
 20 are much appreciated.
 21 "We have activated London LA Gold so now have lots
 22 of help ... It is a terrible tragedy and we are in the
 23 very early stages."
 24 Just one illustration, but this was an offer from
 25 somebody who had expertise in the area; you probably

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1 accept it would have been helpful, potentially, to have
 2 that expertise and assistance; is that correct?
 3 A. Yes, I believe so, yes.
 4 Q. You mention you didn't see the email at the time.
 5 A. No.
 6 Q. Was that because of the volume of work and pressures on
 7 you at that time?
 8 A. That's absolutely the case, yes.
 9 Q. You described the BECC as there was order and there was
 10 processes, but was it the case to an extent that you and
 11 other members of staff were overwhelmed with what you
 12 were dealing with?
 13 A. Yes.
 14 Q. I'm going to move on, please, to a topic we saw on your
 15 handover note, which was the rest centres and deployment
 16 to rest centres.
 17 You mention in your statement — we don't need to
 18 turn to it — at paragraph 33 {RBK00035672/7} that after
 19 the 08.30 SCG meeting, a strategy was put in place to
 20 dispatch council officers to rest centres; is that
 21 right?
 22 A. Yes.
 23 Q. In terms of the strategy, you were Council Silver; was
 24 that your strategy or was it somebody else's strategic
 25 decision?

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1 A. It was Nicholas Holgate's.
 2 Q. Assist us in relation to that, what did Nicholas Holgate
 3 say or do?
 4 A. Following that meeting, Nicholas Holgate went into the
 5 BECC. There were a number of senior managers within the
 6 BECC, and Nicholas said — relayed the strategy to those
 7 in the BECC who were waiting, I think, for some
 8 instruction, and he relayed the strategy, and at that
 9 point I have a vivid memory of various people leaving
 10 that building to go out. I can remember two housing
 11 officers leaving that room to go to the rest centre at
 12 that point.
 13 Q. In terms of the person who made that decision, was it
 14 the case, rather than it being Nicholas Holgate, in fact
 15 it was Rebecca Blackburn who came into the BECC after
 16 the SCG meeting and made the decision to deploy staff to
 17 the scene?
 18 A. That's not my memory. I'm aware that that's in her
 19 statement, but that's not my memory.
 20 Q. How comfortable are you as to your memory of who made
 21 that decision as to deployment?
 22 (Pause)
 23 A. As a percentage? Between — 70%. It's difficult to
 24 say, but I ... I'm not saying that Rebecca — I'm not
 25 challenging what Rebecca said, but my memory is this:

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1 that Nicholas left that meeting — I'm not sure what
 2 time that meeting was, that was the 8.30 strategic
 3 co-ordination group meeting — he left that meeting and
 4 we followed him into the Holland Room, where the BECC
 5 was. Everybody quietened down. He relayed the
 6 strategy, that, you know, we would focus on the
 7 humanitarian response, with housing, social workers, and
 8 that we would go to the rest centres, and we would do
 9 that right now.
 10 Q. By that stage, seven and a half hours approximately had
 11 passed from when RBKC were notified of the fire, and
 12 four hours had passed from when the BECC was accessible
 13 and operational within the Town Hall. Do you accept
 14 that the deployment of staff to the rest centres should
 15 have been done far earlier?
 16 A. Yes.
 17 Q. When do you think it should have been done?
 18 A. With the hindsight that I have now, I think it should
 19 have been done after the 6.30 meeting, the strategic
 20 co-ordination group at 6.30.
 21 Q. Yes.
 22 I'm conscious there was a lot going on, but were you
 23 aware, being Council Silver, that the British Red Cross,
 24 who in part were at some of these locations, these
 25 rest centres, had made multiple requests to the BECC,

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1 from 5.30 in the morning and spanning five hours, asking
 2 when RBKC staff and rest centre managers would arrive?
 3 A. I wasn't aware of that, no. In Mr Kerry's handover to
 4 me, he said that the British Red Cross were at the
 5 rest centres and he provided me with their contact
 6 number. He said — he also said that LBHF would provide
 7 one, if not two, rest centre managers.
 8 Q. We've heard already that, in terms of RBKC trained
 9 rest centre managers, there was only one trained; you
 10 accept that?
 11 A. Yes.
 12 Q. Yes, and there was a hope to try and draw on some from
 13 the neighbouring council. But would it have been
 14 a matter of concern if you heard that the British Red
 15 Cross were contacting the BECC on multiple times,
 16 effectively saying, "Well, when are you sending somebody
 17 down?"
 18 A. Yes, it would have been a concern.
 19 Q. In this relatively ordered BECC which you described, in
 20 a pressurised environment, being fair to you, can you
 21 explain why it wasn't raised to you, as the Council
 22 Silver, the concerns which were being communicated to
 23 the BECC from the rest centres?
 24 A. I've no memory of that being brought to my attention.
 25 Q. In relation to the strategy, I won't ask you any

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1 questions about how made the strategy anymore, but the
 2 strategy to deploy people to the rest centre, did that
 3 include the deployment of senior management staff to the
 4 rest centres to provide support and leadership on the
 5 14th?
 6 A. No, not in the morning.
 7 Q. Was there a reason why it wasn't considered necessary or
 8 wasn't mentioned in the morning?
 9 A. I don't know.
 10 Q. Was there sufficient senior management available to
 11 attend the rest centres that morning?
 12 A. I think there probably was.
 13 Q. Dealing with this topic of senior management providing
 14 support at the rest centres during the 14th as the day
 15 developed, is it a fair summary that there was a chronic
 16 shortage of senior staff down at those rest centres
 17 during 14 June?
 18 A. Yes, I think that's right.
 19 Q. Do you now agree that perhaps more should have been done
 20 to ensure that there was greater representation of
 21 senior managers and rest centre managers at those
 22 rest centres on 14 June?
 23 A. Yes.
 24 MR KEATING: Mr Chairman, that may be a moment for a natural
 25 break. I'm entirely in your hands.

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1 SIR MARTIN MOORE-BICK: Yes. Well, I think that would be
 2 a good thing.
 3 Mr Priestley, we have a break during the morning,
 4 and this is a good time to take it, so we'll stop there.
 5 We'll resume, please, at 11.35, and as with all the
 6 other witnesses, I have to ask you, please, not to talk
 7 about your evidence or anything relating to it while
 8 you're out of the room.
 9 THE WITNESS: Okay.
 10 SIR MARTIN MOORE-BICK: All right? Thank you very much.
 11 Would you go with the usher, please.
 12 (Pause)
 13 Thank you, Mr Keating. 11.35, please. Thank you.
 14 (11.20 am)
 15 (A short break)
 16 (11.35 am)
 17 SIR MARTIN MOORE-BICK: All right, Mr Priestley. Yes,
 18 please sit down. Are you ready to carry on, I hope?
 19 THE WITNESS: Yes, I am.
 20 I wonder if I could just add to a piece of evidence
 21 that I provided this morning. Would that be
 22 appropriate?
 23 SIR MARTIN MOORE-BICK: Yes, of course.
 24 THE WITNESS: So I think I was asked if the BECC was
 25 overwhelmed, to which my memory is that I said yes.

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1 SIR MARTIN MOORE-BICK: Yes.
 2 THE WITNESS: And I think — I just wanted to — I've
 3 reflected on that, and I just wanted to say that
 4 certainly there were times that the BECC was
 5 overwhelmed, but that wasn't a constant theme over those
 6 three days, and I think I was just a little bit too
 7 quick to respond to that, and I just wanted to make that
 8 point, if that was okay with you.
 9 SIR MARTIN MOORE-BICK: Yes, of course. All right. Well,
 10 thank you very much.
 11 THE WITNESS: Thank you.
 12 SIR MARTIN MOORE-BICK: Yes.
 13 MR KEATING: In relation to that topic of overwhelmed, and
 14 it may be the question was slightly different when it
 15 was asked about how you were coping, did you feel
 16 overwhelmed, we were touching on an email, as you may
 17 recall. During 14 June, did you feel overwhelmed at
 18 times by the pressures that were on you?
 19 A. No.
 20 Q. I want to touch upon your role or roles on the 14th,
 21 Council Silver, and you mention at paragraph 38 of your
 22 statement {RBK00035672/8} — we don't need to turn to
 23 it — that:
 24 "... on the first day of the incident whilst my role
 25 was that of BECC Silver I also delivered the functions

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1 of BECC manager in lieu of someone to fulfil these
 2 functions."
 3 Is that correct?
 4 A. Yes.
 5 Q. What was the impact of having to fulfil two roles on the
 6 morning of 14 June in this challenging environment, as
 7 you described it?
 8 A. It was very pressured. It was incredibly busy. I felt
 9 really stretched. It was a very challenging, complex,
 10 fast-moving environment.
 11 Q. What would a BECC manager do, a BECC supervisor/manager
 12 do?
 13 A. A BECC supervisor/manager would hold quite a close
 14 relationship with the BECC officers, manage the
 15 information flows, problem-solve, respond to kind of
 16 very operational matters. I found myself fulfilling
 17 those functions, and less of the strategic functions
 18 that a tactical manager would fulfil. So stretched
 19 between those two roles, I think that's what I was
 20 trying to describe.
 21 Q. So stretched between two roles, you have a noisy
 22 environment, as you touched upon, you've got untrained
 23 staff filling gaps, a huge volume of information coming
 24 into the BECC; was it really the case that the BECC was
 25 performing adequately on 14 June, especially in that

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1 morning?

2 A. So I think ... I think the BECC on the 14th and on the

3 15th was not operating, delivering all of the functions

4 that you — that are in the guidance, and didn't have

5 the situational awareness that you expect in the

6 guidance. So given the size of this incident, its

7 complexity, how fast it was moving, there were

8 activities and decisions being made and delivered

9 outside of BECC structures and processes, and having

10 been involved in numerous incidents in the period since

11 then, some of which have been quite significant and

12 challenging, there was a difference, because the size of

13 the challenge that the local authority had was such that

14 it had to operate some of those systems, such as the

15 humanitarian response and the housing response, almost

16 alongside the BECC, not kind of within those kind of

17 BECC structures and information flows.

18 So I think it was a very different environment to

19 that that I think was envisaged when the guidance was

20 established. I think that my view is that the — it

21 was — the tragedy was such an outlier that the systems

22 and processes that were envisaged just didn't wholly

23 fit.

24 Q. I may come back to that in a while, but I just want to

25 deal with the challenges which you were facing that

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1 morning. You touch upon those in paragraph 39

2 {RBK00035672/8}, and you mention that, on 14 June, one

3 concern was ensuring that those who required support

4 were able to access this support from council staff on

5 the ground in the rest centres; is that correct?

6 A. Yes.

7 Q. And what steps were taken to try to resolve this, to

8 provide support and enable access?

9 A. Housing officers and social workers were dispatched to

10 the rest centres.

11 Q. And in relation to rest centre managers, we've heard the

12 name Elaine Chummary, a BECC officer, she assisted in

13 the BECC, isn't that correct, on 14 June?

14 A. That's correct.

15 Q. And, thereafter, 15 and 16 June. She says, in

16 information provided to the Inquiry, that one of her

17 tasks was to liaise with Westminster City Council and

18 Hammersmith and Fulham, both who were part of the

19 tri-borough agreement, to provide rest centre staff, and

20 she states that it was difficult due to having to rely

21 on volunteers from those councils coming forward.

22 Was that your experience, that it was difficult

23 trying to get rest centre staff and managers from

24 surrounding boroughs in those early days, as you were

25 seeking volunteers?

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1 A. I don't — I wasn't directly involved in that. My

2 memory is of liaising with Alistair Ayres in the London

3 Borough of Hammersmith and Fulham, but not having any

4 direct liaison with Westminster. I have to take

5 Elaine's assessment as that being the case.

6 Q. In general terms, was trying to obtain rest centre

7 managers in those early days when RBKC was leading the

8 response a real difficulty?

9 A. As I said, I think I will have to defer to others who

10 were more directly involved in that for their view. I'm

11 happy to accept Elaine's view on that. She was the

12 officer directly working on trying to identify those

13 rest centre managers. I wasn't involved in that.

14 Q. I'm going to move on now to communication and the

15 rest centres.

16 As Council Silver and the manager within the BECC,

17 how did you get information and updates from the various

18 rest centres on 14 June?

19 A. So the LALOs were providing information through to the

20 BECC. There were officers — council officers based

21 within the rest centres who were providing information

22 as well, and I'm aware that there were TMO staff as well

23 providing information to the BECC. I haven't got

24 a strong memory of a systematic kind of process of

25 capturing that information from the rest centres.

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1 Q. Is it fair to say that any information that was coming

2 back was piecemeal, rather than systematic?

3 A. Well, I think it was systematic from the LALOs because

4 the LALOs were dialling in each hour to provide updates.

5 Outside of that, I don't think it was systematic.

6 I don't think a system had been put in place.

7 Q. In relation — forgive me.

8 A. I do recall at one point, and I'm not sure at which

9 point it was during those three days, assigning a BECC

10 officer — I think it would have been on that — it

11 would have been on the 14th, at one point in the

12 afternoon — assigning a BECC officer per rest centre to

13 be the liaison point. I have a memory of that.

14 Q. In relation to LALOs, you have mentioned in your second

15 statement, paragraph 10.3 {RBK00058265/6}, that contact

16 was made via the LALOs in late afternoon, so about

17 2 o'clock onwards, that process as you described it was

18 implemented.

19 A. Yes.

20 Q. Does that sound correct?

21 A. Yes.

22 Q. And from this information that was being sought, what

23 sort of issues were being fed back to you, if any, on

24 14 June?

25 A. I think there were ... my understanding of the issues

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1 were that they were around basic provision of food, of
 2 clothing, sanitary items. There was requests for those
 3 type of items which were coming in to the BECC. I think
 4 those were the needs that were being identified, that
 5 people were homeless. I'm struggling here to think in
 6 my memory of —
 7 Q. Shall I try and assist you in relation to that?
 8 A. It would be helpful, please.
 9 Q. Of course.
 10 Let's deal with one topic: was the lack of
 11 information being communicated to those who were
 12 affected an issue that was being fed back to you? I can
 13 turn you to an email if that would help.
 14 A. Yeah, that would be helpful.
 15 Q. Let's have a look at {RBK00006508}, please, and we will
 16 see that this is from one of the LALOs, who was
 17 Desmond Zephyr — is that how you pronounce the surname?
 18 A. "Zephyr".
 19 Q. Zephyr, and he was one of the LALOs who had been tasked
 20 to go around from rest centre to rest centre; is that
 21 correct?
 22 A. Yes.
 23 Q. And we see 6.15:
 24 "I'm currently at [Rugby] Portobello where
 25 an announcement was made re. accommodating those from

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1 Grenfell i.e. elderly and vulnerable.
 2 "Advice coming from the centres that I have visited
 3 is that there is a lack on information being
 4 communicated. I have directed enquiries to the website
 5 but the feeling is this is not sufficient so hopefully
 6 we can utilise social media more.
 7 "Red cross and Humanity First are coordinating the
 8 volunteers response."
 9 You forwarded this email. We can see that the email
 10 is at 16.15, it's sent to you, Rebecca Blackburn,
 11 David Kerry, and you forwarded that on to the BECC at
 12 16.41.
 13 What action did you expect to be undertaken by that
 14 being forwarded to the BECC?
 15 A. The BECC would log that, and that they would engage with
 16 the communications team, and that the communications
 17 team would try and do something to remedy the situation.
 18 Q. That's the media and communication team led by
 19 Martin Fitzpatrick?
 20 A. That's correct.
 21 Q. Do you recall, as Council Silver, any specific actions
 22 being done to try to address issues with communication
 23 as identified here on 14 June?
 24 A. I don't have any recollection of that, no.
 25 Q. Let's move on now to registration, registration of those

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1 who were affected at the rest centres.
 2 What was your understanding of the process for
 3 registration of those who attended rest centres?
 4 A. My understanding was that those who had attended were
 5 being registered and that that information should be
 6 passed to the police.
 7 Q. Was that an assumption? Was that something you were
 8 told? Was that something by way of training? Where did
 9 that understanding stem from?
 10 A. I can't recall, I'm sorry.
 11 Q. In terms of the rest centres, who did you understand to
 12 be responsible for the registration process?
 13 A. I ... whomever was in charge of the rest centres.
 14 Q. Okay.
 15 Again, I'm not trying to trick you in any of these
 16 questions at all, but did you understand who was
 17 responsible for registration at rest centres on 14 June?
 18 A. As I say, I think my understanding would have been that
 19 it would have been whomever was in charge of the
 20 rest centres, the operational rest centre manager.
 21 Q. Would that mean the local authority would be in charge
 22 of the registration process at rest centres, as you
 23 understood it at the time?
 24 A. Probably, yes. I am aware that the British Red Cross
 25 also have a process to register at rest centres, but my

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1 understanding is that they're doing so on behalf of the
 2 local authority. It's the local authority's
 3 responsibility.
 4 Q. Is it fair that, from 14 to 16 June, whilst RBKC were
 5 leading the response, there was an ongoing issue
 6 regarding uncertainty as to the numbers of people
 7 affected?
 8 A. Yes, I think that's the case.
 9 Q. And how confident are you as to your understanding at
 10 the time of the process of registration?
 11 A. I think I understood it broadly. I didn't — don't
 12 think I had a granular detail understanding of it.
 13 Q. In terms of British Red Cross, you've mentioned, and
 14 their involvement at rest centres and specifically the
 15 Westway, were you aware that they would record details
 16 using triple carbon paper?
 17 A. No.
 18 Q. I wonder if we could have a look at Colin Brown from
 19 British Red Cross's statement. We've seen it yesterday,
 20 but I want to give you the opportunity, and you're
 21 probably aware of this if you watched yesterday.
 22 {BRC00000005/25}, please, paragraph 100.
 23 Forgive me for one moment.
 24 (Pause)
 25 He says this:

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1 " ... I remember that there was (during these initial
2 stages) no centralised system of recording the needs,
3 status or location of survivors. The only system that
4 did appear to be put in place by the [RBKC] was the one
5 with which the RBKC asked the BRC to assist, which was
6 used to control access to the Westway throughout the
7 entirety of the centre's operation. The RBKC had
8 produced a number of hard copy forms on triple-carbon
9 paper. BRC volunteers and staff simply went around the
10 Westway and recorded the details of anyone of people
11 [sic] who approached the registration desk, but also
12 anyone who they came across who had not been previously
13 registered they came across. The BRC volunteers and
14 employees then kept one copy and provided the other two
15 copies to the RBKC ... No request was made by the RBKC
16 that the BRC enter this data into any electronic system,
17 or to collate the data in any other meaningful way (and,
18 indeed, I considered that this would have been the
19 responsibility of any local authority in response to any
20 disaster, and not that of the BRC)."

21 Were you aware of that process at the time?

22 A. No.

23 Q. As Council Silver during the day, as you inherited that
24 position as David Kerry was working at night, do you
25 think you should have been aware of that process?

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1 A. Yes.
2 Q. Paragraph 101 {BRC00000005/26}, Mr Brown from
3 British Red Cross says this:
4 "However, I got the sense that the RBKC was not
5 discharging this responsibility. I came to this view
6 because a BRC volunteer found a box containing a number
7 of the second and third copies of the registration forms
8 that had been filled in by the BRC and provided to the
9 RBKC left lying around the Westway. It appeared that no
10 efforts had been made by the RBKC to collate the data in
11 any sensible manner. I asked the Bronze [I think he's
12 referring to their British Red Cross Bronze] onsite Duty
13 Officer to report the presence of this box to the RBKC,
14 to express concern and dissatisfaction as to this state
15 of affairs, and to ask for clarification as to how the
16 data was being appropriately collated. However, I am
17 un[a]ware how the council responded (or whether it did
18 in fact do so at all)."

19 Were you aware of concerns being expressed in those
20 early days by the British Red Cross as to the treatment
21 of the registration forms at the Westway?

22 A. No, I wasn't.

23 Q. So as Council Silver during the day and as BECC, which
24 was operating, you say, appropriately and adequately,
25 you weren't made aware of this issue at all?

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1 A. I've no memory of being made aware of this issue at all.

2 Q. And do you accept that this is an unacceptable state of
3 affairs in relation to registering those who were
4 affected by the fire?

5 A. Yes, I do.

6 Q. I'm going to move on to the Westway. We touched upon it
7 there -- and we can take that off the screen, thank you
8 very much.

9 The Westway Sports Centre, this was a rest centre
10 which had opened spontaneously in the community on
11 14 June, rather than officially by RBKC; is that
12 correct?

13 A. Yes, that's my understanding.

14 Q. Yes.

15 Can you say when it was decided that the Westway
16 Sports Centre would provide the overnight rest centre
17 facilities for the night of the 14th and, in essence,
18 become that consolidated rest centre?

19 A. I think it was either at the 11 o'clock RBKC Gold Group
20 or around that time. So 11.00/midday-ish. I think
21 that's ... that's my memory.

22 Q. Okay.

23 I wonder if it's possible to open up your second
24 statement, please, at paragraph 9.1 {RBK00058265/6}.

25 This question had been put to you before in writing:

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1 "When in the afternoon was this decision made?"

2 So paragraph 39 of your first statement
3 {RBK00035672/8} suggests it was made in the afternoon,
4 not at the 11 o'clock meeting.

5 A. Yes.

6 Q. We can turn to it if you wish. So bearing in mind that
7 you said in your first statement that it was in the
8 afternoon that decision was made, you were asked, "When
9 in the afternoon was this decision made?", and you say
10 this at 9.1:

11 "I am unable to be precise about the timing of the
12 decision made on 14 June."

13 And then you produce the RBKC Gold meeting minutes
14 for 3 o'clock, and it states in there:

15 "Westway Sports Centre will be open overnight.
16 Looking at how many people need to be accommodated."

17 Is it the case that that decision, piecing together
18 your statements and the documentation, must have been
19 made some time close to 3 o'clock onwards?

20 A. I think, now that I've seen this, that's quite possibly
21 the case, yes.

22 Q. You were attending a number of meetings on 14 June.
23 We've got the SCG meetings, we've heard about.

24 A. Yes.

25 Q. Was it right that you were tasked to attend mass

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1 fatality group meetings as well?
 2 A. I did.
 3 Q. I'm not going to ask you about those, but those were
 4 meetings you had to attend; correct?
 5 A. Yes.
 6 Q. You attended the RBKC Gold meetings as well, which were
 7 at 11 o'clock and 3 o'clock; is that correct?
 8 A. I didn't attend those on the 14th.
 9 Q. You didn't?
 10 A. No, I attended a strategic Silver meeting in -- so
 11 I think there was a -- so the morning Gold Group, the
 12 RBKC Gold Group, I didn't attend that, Rebecca Blackburn
 13 attended that on behalf of the BECC, because I think
 14 I have -- there was a potential overlap with the mass
 15 fatalities. And then the afternoon meeting, I don't
 16 think -- the 3 pm Gold Group, I don't think I attended
 17 that either because there was an overlap with the
 18 strategic Silver meeting, which I dialled in to.
 19 So on the first day, my notes and my memory is that
 20 I didn't attend those Gold Group meetings, but I did
 21 attend them in the subsequent days.
 22 Q. Okay. I think I may be misdirecting you. You did
 23 attend the meetings in subsequent days.
 24 A. Yes.
 25 Q. But on 14 June, there was those meetings you said you

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1 attended, plus the Silver meetings, which are the
 2 tactical co-ordination group meetings as well.
 3 A. Yes.
 4 Q. And they were chaired by the Metropolitan Police; isn't
 5 that correct?
 6 A. That's correct.
 7 Q. In essence, the Silvers, those who were leading the
 8 operational or tactical response, liaising with each
 9 other to ensure situational awareness --
 10 A. That's correct.
 11 Q. -- amongst other things.
 12 In relation to those, we know that, from evidence
 13 provided to the Inquiry, the 10 o'clock and 12.30
 14 tactical co-ordination group meetings took place, but
 15 no one directly from RBKC was noted as attending, save
 16 Tom Brady from London Resilience. Do you know the
 17 reason why?
 18 A. I don't know the reason why, no.
 19 Q. Was it the case that RBKC was simply too stretched to
 20 attend somebody to those meetings?
 21 A. I think that's probably a reasonable assessment.
 22 I mean, I've no memory of being informed that those
 23 meetings were taking place.
 24 Q. Okay. No memory of being informed that they were taking
 25 place?

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1 A. Those ones in the morning -- the ones that you referred
 2 to in the morning.
 3 Q. And even if you were invited, there would have been
 4 difficulties in terms of capacity at that stage?
 5 A. I think that I would have tried to get someone there.
 6 Q. Yes.
 7 Does it follow that you were not aware of the
 8 outcome of those tactical co-ordination group meetings
 9 at 10 o'clock and 12.30 on the morning of the 14th and
 10 afternoon?
 11 A. I don't recall that, no.
 12 Q. We do know that you attended the next one, which is at
 13 15.30, 3.30 in the afternoon, and that was chaired by
 14 Chief Inspector Stokoe. From those meetings -- perhaps
 15 I can lead it this way -- he noted that the police
 16 advised that all the rest centres were full to capacity,
 17 and an alternative venue should be sought for the
 18 friends and family reception centre, which was at the
 19 Salvation Army building on Portobello Road, and RBKC
 20 were tasked to review the numbers and capacity of the
 21 rest centre and families and friends rest centre to
 22 ensure that there was sufficient provision. Does that
 23 assist in terms of a summary of events at that meeting
 24 at 15.30?
 25 A. Yes, it certainly assists, but I've no memory of that,

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1 but certainly it assists and I'm -- I was certainly
 2 there, but ...
 3 Q. We know that you attended the next meeting at 6 o'clock,
 4 the next tactical co-ordination group meeting, and you
 5 were there with David Kerry, and it was reported that
 6 RBKC had reviewed the rest centre provision and it was
 7 sufficient, the Westway was only a quarter full and
 8 a decision was made not to open another rest centre;
 9 does that sound correct?
 10 A. Yes.
 11 Q. And in relation to the friends and family reception
 12 centre, it was reported by RBKC not to be busy, but RBKC
 13 were in a position to open a further one if required and
 14 that you would review the position on 15 June; does that
 15 assist?
 16 A. It sounds very sensible and plausible. I have no memory
 17 of that now. I'm really sorry.
 18 Q. You're just reliant on the documentation --
 19 A. Yes.
 20 Q. -- in relation to that. I understand.
 21 I just want to bring out one matter which was
 22 raised. I can take you to the statement, but perhaps
 23 I can just summarise what's said by
 24 Chief Inspector Stokoe in his statement at page 24
 25 {MET00079356/24}.

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1 At a tactical co-ordination group meeting at
 2 6 o'clock, police reported -- and the police category
 3 which reported was called "Bronze Hospitals", so likely
 4 to be somebody who was based at the hospital -- that:
 5 "Information about the Rest Centres and what
 6 help/support is available was not getting through to
 7 people for whom English was not their first language."
 8 Do you recall that?
 9 A. I don't, no. But I've -- I understand that to have been
 10 an issue. I've seen other documents that describe that.
 11 Q. It's something which clearly emerged on 14 June as
 12 a live issue; is that correct?
 13 A. That's correct. I think it may have also been picked up
 14 at one of the subsequent Gold meetings as well.
 15 Q. What steps -- bearing in mind this was an issue RBKC in
 16 general was aware of -- were taken to support and
 17 communicate with those for whom English was not their
 18 first language?
 19 A. I can't recall any steps being taken. That's not to say
 20 that there weren't steps taken, but I just can't recall
 21 them, I'm terribly sorry.
 22 I mean, the council had access to services such as
 23 LanguageLine. I mean, in my previous role as a social
 24 worker for the authority, we would use LanguageLine and
 25 those type of services. So social work staff on the

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1 ground and housing work staff on the ground had access
 2 to those types of services.
 3 In relation to putting out information -- printed
 4 information in different languages, it might seem
 5 a sensible option in this regard. I don't know if
 6 any -- if that was undertaken.
 7 Q. In general terms, there were significant challenges with
 8 communication to those affected, irrespective of the
 9 language issues; isn't that correct?
 10 A. Yes, that's correct.
 11 Q. In relation to 14 June, which we've spent some time in
 12 relation to, you handed over your duties to David Kerry
 13 around 8 or 9 o'clock, on your account, set out in your
 14 evidence, and you had been up since 3 o'clock in the
 15 morning; is that correct?
 16 A. That's correct.
 17 Q. In terms of your assessment of RBKC's response and how
 18 they were coping with leading the response in relation
 19 to the aftermath and meeting the needs of those affected
 20 on 14 June, how do you think RBKC were doing?
 21 A. I think at the time, and I'm -- I have to go back to
 22 what I thought at the time, and I think that my
 23 thought -- I thought at the time that the council was
 24 working extremely hard and doing all that it could in
 25 a very challenging and complex and fast-moving incident.

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1 I felt that we probably -- we weren't there early
 2 enough, and I felt that we'd -- the authority had
 3 struggled to catch up during the rest of the day.
 4 Q. You describe a struggle to catch up and the efforts
 5 which were being undertaken by you and your colleagues,
 6 but was this sustainable going forward, did you think?
 7 A. I'd -- so I think, in the morning, my view was that we
 8 would seek to cope with the existing -- as I'd said
 9 earlier in my evidence, that we would seek to cope with
 10 the existing resources within the council and our
 11 neighbouring boroughs under the kind of tri-borough
 12 arrangements. But come the evening, and come the
 13 following day, I thought we needed more help at each
 14 level of the response in order to respond.
 15 I was -- being in the BECC for all those hours and
 16 working really intensely was like being in a bubble.
 17 I don't think the true magnitude of the tragedy really
 18 hit me until I got home and I was able to watch the
 19 television. I did feel like I was in a -- yeah, I think
 20 it didn't properly hit me, the magnitude. So come the
 21 following morning, I did think that the -- we needed
 22 more help at each level.
 23 Q. So the magnitude of events came to you when you came
 24 home after a long shift and, by the morning, your view
 25 was that RBKC needed more help?

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1 A. Yeah.
 2 Q. Let's turn to 15 June, and deal with it probably
 3 a little bit shorter, if that's okay with you.
 4 We know that you had a handover in the morning with
 5 David Kerry, who had been working overnight. You
 6 mention in your statement at paragraph 43
 7 {RBK00035672/9} that the BECC log still contained many
 8 actions which were live and not closed; is that correct?
 9 A. Yes.
 10 Q. Was that a matter of concern for you?
 11 A. Yes.
 12 Q. And why was that?
 13 A. I had hoped -- this may be due to my inexperience, but
 14 I had hoped that it would be a bit quieter during the
 15 night and that some more progress had been able to be
 16 made around the closing of some of the live log issues.
 17 Q. Perhaps we could have a quick look at an email which you
 18 sent, {RBK00004244}, please, sent in the morning at
 19 05:08:
 20 "We need a strategy for today."
 21 Sent by you to the BECC:
 22 "Comms; distributing aid; housing plans as
 23 wells[sic] longer term recover strategy. I'm sure you
 24 have given this thought overnight."
 25 Do you recall sending that?

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1 A. No, but I clearly did.
 2 Q. Now having seen it, and trying to recollect as you were
 3 going into that new day, understanding the magnitude of
 4 what has happened, thinking, "We need support", what was
 5 the outcome of this request, can you recall?
 6 A. I can't recall. I can't recall.
 7 Q. In your handover, as you describe a handover taking
 8 place that morning, was there any discussion regarding
 9 staff levels for the BECC and staff levels including
 10 rest centre managers at the rest centres?
 11 A. I can't recall, but I would have expected conversations
 12 about calling on the LLACC for mutual aid, because
 13 I think there were conversations — I know from my
 14 reading that there were conversations with the LLACC
 15 about mutual aid staff from the LLACC to be provided on
 16 the 15th. But I have no memory of the conversation.
 17 Q. I think we had two "lacks" in there, so you're talking
 18 about the lack of mutual aid staff, and then you talk
 19 about LLACC being the London Local —
 20 A. Authority —
 21 Q. — Co-ordination —
 22 A. Yes.
 23 Q. Okay.
 24 A. And they are — that's the organisation that can provide
 25 mutual aid —

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1 Q. Yes.
 2 A. — to local authorities in such circumstances, and there
 3 were conversations between the BECC and the LLACC about
 4 mutual aid staff going into the BECC, and I think there
 5 was a — on the evening of the 15th, Louise Elstow
 6 attended the BECC, and I think — my memory is that she
 7 attended the BECC as a result of coming through the
 8 LLACC.
 9 Q. This co-ordination centre?
 10 A. Yes, the co-ordination centre, let's call it that.
 11 Q. Yes.
 12 There's difficulties, then, in terms of obtaining
 13 staff assistance via this mutual aid process at that
 14 stage?
 15 A. Yes.
 16 Q. We know that Mark Sawyer, who was the chief executive
 17 liaison officer resilience, attended the Town Hall on
 18 15 June, and there was a meeting around 8 o'clock in the
 19 morning. Did you attend that meeting?
 20 A. I don't know. If there's evidence to suggest I did then
 21 I'm happy to concede that, but I've no memory of that.
 22 Q. I won't take you to it, but it's referred to in your
 23 notebook as Mark Sawyer meeting at 8 o'clock.
 24 A. Okay.
 25 Q. Which is why I've asked.

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1 A. Yeah.
 2 Q. But do you have any independent recollection of what was
 3 discussed when you met Mark Sawyer?
 4 A. No.
 5 Q. If you met Mark Sawyer.
 6 A. No.
 7 Q. No.
 8 Perhaps we could open up paragraph 44 of your first
 9 statement {RBK00035672/9}, please. It just sets out
 10 here what you were doing as BECC Silver: you managed the
 11 BECC delivery; supporting the humanitarian assistance
 12 strategy, which Sue Redmond by that stage was leading as
 13 HALO; you were also responding and supporting the
 14 implementation of a donation strategy led by
 15 Debbie Morris.
 16 I'm now overleaf {RBK00035672/10} and I wanted to
 17 focus on this aspect:
 18 "A priority was to get the outer cordon lifted so
 19 residents could return to their homes if they wished."
 20 Is that correct?
 21 A. Yes. I don't know that that was a priority for the —
 22 I don't think it was within the gift of the local
 23 authority to lift that cordon, I think that was with the
 24 police and the fire services, but I think there was
 25 a concern that if that outer cordon wasn't lifted, the

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1 authority wouldn't have — would struggle to accommodate
 2 the displaced — those that would have been displaced by
 3 that cordon over the next period.
 4 Q. So let's focus on this struggle to accommodate those
 5 people as you described.
 6 If we could open up the RBKC Gold Group minutes
 7 which took place on 15 June at 3.30, that's
 8 {RBK00020448/1}. We see, under "Response priorities",
 9 fourth bullet point:
 10 "If the cordon is not lifted, then have over 800
 11 people to find places. Will need to seek help from
 12 Government."
 13 Do you recall that?
 14 A. Yes.
 15 Q. What was the nature of help from government that was
 16 being considered at that meeting at 3.30 on 15 June?
 17 A. I've no memory of a conversation about the nature of
 18 that. I think that our housing colleagues had worked
 19 very hard to try and identify the bed spaces that they
 20 had. This was summer, it was in London, and I think
 21 that was a challenge for them, and I think it would have
 22 been a significant challenge to find hotel spaces for
 23 800 people in the middle of the summer. I think that —
 24 I'm going to assume that that was the anxiety that was
 25 being discussed at the Gold Group.

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1 Q. So in relation to that anxiety, was there pressure
 2 exerted on the TMO to ensure that displaced people would
 3 return to their homes in the walkways irrespective of
 4 the condition of the properties on 15 and 16 June?
 5 A. I haven't got a sense of that, no. That's not something
 6 that was apparent to me at the time. I have no memory
 7 of that either.
 8 Q. I just want to explore that a little bit more with you,
 9 if I can.
 10 Let's open up a statement from Teresa Brown, the
 11 director of housing for the TMO. {TMO00869990/9},
 12 paragraph 45.
 13 I'll give you a chance to familiarise yourself.
 14 This is her statement, paragraph 45:
 15 "I recall on 15 June having discussions with
 16 Stuart Priestley from RBKC BECC who had advised that
 17 consideration was being given at that time to return
 18 residents evacuated in surrounding areas of the Tower."
 19 Do you recall that now, that discussion?
 20 A. I certainly had conversations with —
 21 Q. Yes.
 22 A. — Teresa —
 23 Q. I'm going to deal with it in parts.
 24 A. Yeah.
 25 Q. "I recall discussing the possible impact on residents if

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1 this went ahead advising that if residents returned home
 2 they would have no gas/boiler, and consequently no hot
 3 water or cooking facilities, as the surrounding areas
 4 ran off the Tower's heating/hot water services. We also
 5 needed to repair damaged doors ... and I suggested that
 6 returning residents should not be rushed back until we
 7 could ensure ... provision of services ..."
 8 Do you recall her saying that, that suggestion,
 9 "returning residents should not be rushed back until we
 10 could ensure proper provision of services"?
 11 A. I don't recall that, no.
 12 Q. By the evening of 15 June, was it the position that,
 13 despite what we've had read out there about concerns by
 14 the TMO, the decision of RBKC Gold Group was that the
 15 walkway residents should be returned as soon as
 16 possible?
 17 A. I'm sure that that's the case if that's recorded in the
 18 minutes.
 19 Q. Well, let's read paragraph 48 of the statement, if we
 20 could scroll down:
 21 "At approximately 8pm on the 15 June, I was
 22 contacted by the BECC and asked to meet Police
 23 Inspector Bean at the Kensington Leisure Centre. This
 24 was to inspect the finger blocks area to examine whether
 25 all the areas that needed boarding up before residents

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1 returned were secure."
 2 Moving on:
 3 "I was advised on that inspection that the intention
 4 of Gold group was that finger block residents should be
 5 returned as soon as possible. I repeated my concerns
 6 about it being premature due to the lack of gas/heating
 7 etc ..."
 8 It moves on {TMO00869990/10}:
 9 "I telephoned Sacha Jevans [from TMO] from site who
 10 had the same reservations. [Ms Jevans] said she would
 11 call Laura Johnson [RBKC]. Sacha [Jevans] called me
 12 back shortly after and said that Laura [Johnson] said we
 13 had to go with the Gold group decision."
 14 So in relation to this, it's not in a minute, but
 15 were you aware that RBKC Gold had made a decision or
 16 there was a communication that residents would have to
 17 go back to those properties in the finger blocks?
 18 A. I wasn't ...
 19 (Pause)
 20 I can't say that I was — I mean, I think if I was
 21 at that meeting and that was the decision that was made,
 22 then I would have been aware of that, but that decision
 23 was not a decision that I made personally. I didn't —
 24 that's — I didn't have the expertise to do that. I'm
 25 not senior enough to do that. Whilst I was a Silver

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1 within this, that is a Gold decision.
 2 Q. I suppose the question is more not that you made the
 3 decision, I'm not suggesting you did, but whether you
 4 were aware that that decision was made?
 5 A. I think if I was at that meeting and that decision was
 6 made at that meeting, then I would probably have been —
 7 I would have been aware of that decision.
 8 Q. And if the decision wasn't made at the meeting and it
 9 was made after the meeting but before 8 o'clock on
 10 15 June, for some of that time you were Council Silver
 11 in the BECC; were you aware then in your position as
 12 Council Silver of that decision?
 13 A. I've no memory of that, but I may or may not have been.
 14 I think as I described in the first session, there were
 15 decisions — a lot of decisions being made independent
 16 and outside of the BECC structures. If this wasn't made
 17 at Gold, at which I was present, was made outside of
 18 Gold, then there is a chance that I was not aware of it.
 19 Q. Okay.
 20 I wonder if we could return back to the minutes of
 21 the meeting, I'm going to move on to a slightly
 22 different topic, the 15.30 minutes of the RBKC Gold
 23 meeting, {RBK00020448}. Page 1, final bullet point:
 24 "BECC to collect information on number of people
 25 registering at the Rest Centres."

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1 We've touched upon this a number of times, that this
 2 was a constant theme throughout 14 June and into
 3 15 June; isn't that correct?
 4 A. Yes.
 5 Q. Was there a confidence at RBKC by this stage of being in
 6 possession of accurate information of the number of
 7 people registering at rest centres?
 8 A. I don't think there was, no.
 9 Q. Was there knowledge and information as to what the other
 10 unofficial rest centres, such as the Rugby Portobello
 11 Trust and Clement James, who were still being used by
 12 those displaced, the numbers there, was there any
 13 knowledge as to that?
 14 A. Could you scroll to — I've slightly lost the timeframe,
 15 I'm terribly sorry.
 16 Q. I'm moving around documents. It's not your fault.
 17 We're on to Thursday, 15 June, and it's 15.30, so 3.30
 18 in the afternoon.
 19 A. Okay.
 20 Q. You're Council Silver.
 21 A. Yeah.
 22 Q. And we know by this stage Westway is the official
 23 rest centre.
 24 A. Yes.
 25 Q. Rugby Portobello Trust and Clement James Centre are no

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1 longer official rest centres, but there's evidence to
 2 suggest that they're still being used.
 3 A. Yes.
 4 Q. Was that your understanding at the time?
 5 A. That's correct.
 6 Q. Was there support that you were aware of being provided
 7 on 15 June to those unofficial rest centres?
 8 A. I'm not aware of any support, no.
 9 Q. If we could scroll down, please, to page 3
 10 {RBK00020448/3}, under the heading "Forward look",
 11 "Internal staffing", again, another theme that we've
 12 touched upon:
 13 "NA ..."
 14 That's Nick Austin; is that correct?
 15 A. Yes.
 16 Q. "... said that the [Westway Sports Centre] needs
 17 a Senior Manager and a Rest Centre Manager ... BECC
 18 working on rota for Rest Centre Manager. Senior
 19 officers thin on ground but will think about this."
 20 Is that correct?
 21 A. Yes.
 22 Q. Why were senior officers thin on the ground?
 23 A. I'm not sure. I'm not sure whether that was because
 24 of — because they were deployed to other parts of the
 25 response or because it was the summertime and some of

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1 them were on leave, I'm not sure.
 2 Q. The last topic at this meeting is at the top of page 3.
 3 It's an entry under "Communications":
 4 "CC [Claire Chamberlain] feedback that Coms
 5 [communications] was not seen to be working and that the
 6 Council was not visible enough."
 7 That was something which was highlighted. Is that
 8 correct?
 9 A. Yes.
 10 Q. If we can return to another document, please, leaving
 11 this theme for a moment, that's {RBK00003973}. This is
 12 Desmond Zephyr, 15 June, earlier, 11.21, to you and the
 13 BECC:
 14 "Morning.
 15 "Can I get an updated list of the official
 16 rest centres and respite centres and what they are
 17 offering.
 18 "I am being asked by voluntary groups where people
 19 can or should be directed to.
 20 "Also is it possible to get a list of what items, if
 21 any are actually needed.
 22 "Finally again the complaint is there is a lack of
 23 communication and strategy, on the ground. Where can
 24 people go to get clear messages and information. To
 25 date I have been directing people to the council website

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1 but if there are official social media streams I think
 2 this would be more effective."
 3 Do you recall that email?
 4 A. I've seen that email.
 5 Q. Yes.
 6 A. I don't recall it, but yeah, I've certainly seen it.
 7 Q. Do you agree that was a justified complaint, there was
 8 a lack of communication and strategy?
 9 A. Yes.
 10 Q. And really pulling together the minutes of the meetings
 11 and emails on 15 June regarding staffing, visibility,
 12 communication, were these illustrations how RBKC on
 13 15 June were struggling in leading the humanitarian
 14 response?
 15 A. Yes.
 16 Q. We know that you worked on 16 June. I'm not going to
 17 ask you questions in relation to that because we know
 18 that, in due course, the local London Gold arrangements
 19 were activated formally at 2 o'clock on the Friday.
 20 So I just want to move to the last section, and
 21 you've touched upon it already, really, regarding this
 22 last section about adequacy of the response. We've
 23 dealt with 14 June, we've dealt with 15 June.
 24 Stepping back for a moment, what were your
 25 observations on the adequacy of the response during the

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1 first seven days of the aftermath by RBKC?
 2 A. I think that the incident was bigger than RBKC could
 3 handle. What I saw was people working incredibly hard,
 4 doing their absolute best, but I don't think we were
 5 there early enough, there weren't enough of us. The
 6 authority failed to communicate effectively what it was
 7 doing, what the offer was, and how to access that offer.
 8 Q. So that last part: failed to communicate effectively
 9 what it was doing, what the offer was and how to access
 10 that offer?
 11 A. Yes.
 12 Q. Yes.
 13 A. Not consistently, yeah.
 14 Q. Thank you, Mr Priestley, in relation to that.
 15 I'm just going to touch upon a few things you set
 16 out in your first statement, please, just perhaps to
 17 clarify a few matters. That's {RBK00035672/13},
 18 paragraph 59.
 19 You have summarised that to us a moment ago, the
 20 first part in relation to communication, your view that
 21 the council's communications, you didn't think they were
 22 sufficient. It's the final sentence I just wanted to
 23 draw out:
 24 "Once the communication impetus was lost on the
 25 first day it was something that was very difficult to

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1 recover from."
 2 Is that correct?
 3 A. Yes.
 4 Q. If we could scroll down to paragraph 62, and something
 5 which is in your statement which you say regarding the
 6 plans, policies and procedures:
 7 "I do not believe that the plans were lacking in any
 8 way. The plans were of sufficient standard. The plans
 9 were followed."
 10 You had mentioned in relation to the BECC sometimes
 11 you were doing things which were not within the
 12 processes, but do you still stand by that information
 13 set out in your statement, that you believe the plans
 14 were not lacking in any way?
 15 A. So I don't — where I was coming from for that statement
 16 was in the period immediately following the fire,
 17 the council asked an independent emergency planning
 18 expert to review the plans, to make an assessment as to
 19 whether the plans were substandard in any way, and my
 20 understanding was that his assessment was that their
 21 plans were sufficient. So I was being guided in that
 22 assessment by an independent expert. I mean, I think we
 23 established at the very beginning that I took no part in
 24 the writing of these plans because I'm not a subject
 25 matter expert. So that's what guided that part of the

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1 statement.
 2 Q. Yes.
 3 A. I think that the plans — when I say the plans were
 4 followed, as we've already established today and this
 5 week, the plans weren't followed to the letter, but
 6 I think if you — there were many parts of the
 7 contingency management plan which were followed in
 8 that — on that first day. But not all of the plans
 9 were followed all of the time.
 10 Q. You have been following the evidence, as you said,
 11 you've heard the evidence of David Kerry yesterday and
 12 the day before, and you may have seen or heard the
 13 opening submissions made by RBKC at the beginning of
 14 this module, and there was acceptance that the RBKC
 15 plans were deficient in a number of ways.
 16 Are you disagreeing with that in light of what you
 17 said at paragraph 62, or do you accept what is said by
 18 David Kerry and RBKC now?
 19 A. Well, I think some of the plans were deficient, some of
 20 the plans were absent, some of the plans were draft,
 21 I would completely agree with that and the evidence that
 22 the Inquiry has already received.
 23 I think in making that statement in my — the
 24 written statement, I was really thinking about the
 25 contingency management plan, and I think that that was

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1 what was assessed, if my memory's correct, and found to
 2 be not substantially lacking.
 3 Q. And then in relation to that document, that main plan,
 4 that's the one which David Kerry concedes that there was
 5 some shortcomings in relation to, as do RBKC.
 6 A. Well, I'm sure that that's the case. David is
 7 an expert. I'm not an expert. I'm sure the council's
 8 legal team have had an opportunity to pore over it in
 9 far more detail and develop their own expertise around
 10 it to draw their own conclusion, which would be far —
 11 Q. This is not —
 12 A. — better than mine.
 13 Q. Forgive me, this is not a criticism of you.
 14 A. No.
 15 Q. As you mentioned before, it's not your area of
 16 expertise, contingency management, that's Mr Kerry's —
 17 A. Yes.
 18 Q. — area of expertise. You were his line manager. Were
 19 there any structural difficulties that you were there as
 20 his line manager by way of oversight of his work when
 21 you had no real expertise in relation to the nature of
 22 his work?
 23 A. I don't think so. I think within local government, and
 24 I'm sure within lots of other organisations as well, you
 25 will have people who are subject matter experts being

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1 managed by people who are not subject matter experts.
 2 I think the question is a fair one: to what degree
 3 should I have been a subject matter expert in order to
 4 manage a subject matter expert? Where does that line
 5 finish? I don't know. I think — I don't think that
 6 the arrangements that we had with myself as not being
 7 a subject matter expert managing a subject matter expert
 8 were any different to any other local authority in
 9 regards the contingency managing — contingency planning
 10 teams, certainly not any different to Hammersmith and
 11 Fulham as was or as is, and I think that would be the
 12 case for many other London boroughs.
 13 Q. Just stepping back and analysing that for a moment,
 14 although it may not be different from other local
 15 authorities, do you think it is or was a potential
 16 blind spot, actually, that your lack of expertise meant
 17 that there wasn't proper oversight of David Kerry?
 18 A. I think that — I think there were other measures that
 19 can be put in place to provide corporate scrutiny of
 20 contingency planning teams, and I think the authority at
 21 the time lacked scrutiny of the contingency planning
 22 team. So it wasn't a — so my relationship to David was
 23 a management relationship, and there was a degree of
 24 scrutiny responsibility that I had within that
 25 relationship, but I think the authority — because the

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1 responsibility for responding to incidents under the
 2 Civil Contingencies Act is not located within the team,
 3 it's located within the authority, and at the most
 4 senior level, and I think that the scrutiny — that the
 5 authority lacked the — didn't have a piece of
 6 apparatus, didn't have a means to exert a scrutinous eye
 7 across the work of the team and the council's
 8 capabilities in responding to incidents.
 9 Q. Thank you.
 10 Final area, so we're towards the end now, and it's
 11 something that you've touched upon already, that there
 12 was a number of internal debriefs at RBKC which were
 13 undertaken by an external expert. So there was the
 14 Kensington and Chelsea Grenfell Fire Debrief Report, ran
 15 to about 105 pages, prepared by Andrew Pritchard, which
 16 was there to capture the learning from the
 17 Grenfell Tower fire; isn't that correct?
 18 A. Yes.
 19 Q. I wonder if we could open that up. I want to deal with
 20 a couple of headlines, if I may. That's {RBK00068075}.
 21 So that's the first page there.
 22 If we could go to page 3 {RBK00068075/3}, please,
 23 section 5, "Findings":
 24 " ... Executive Summary. The four key themes of the
 25 de—brief are:

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1 " ■ Communications."
 2 Pausing there.
 3 5.2:
 4 "Communications. With the exception of the fourth
 5 question concerning the provision of normal services
 6 during the Fire response ... the issue addressed by the
 7 overwhelming number of responders was that of
 8 communications, both internal and externally, accounting
 9 for nearly one quarter of all the replies."
 10 Pausing there for a moment, in terms of context,
 11 this debrief report invited staff who were at RBKC,
 12 which I'm sure probably included you, to fill out
 13 a questionnaire, and that material was digested by
 14 department, collated and analysed, and this is the
 15 report; is that correct?
 16 A. Yes.
 17 Q. And communications was the most frequently mentioned
 18 theme; isn't that correct?
 19 A. Yes.
 20 Q. And from what you've said to us in your evidence, it's
 21 probably a valid — well, it's not probably; it is
 22 a valid issue which was raised.
 23 A. Yes.
 24 Q. "Planning and Procedures" is the second topic we can see
 25 at 5.1. Perhaps we could scroll down to 5.5, a little

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1 bit lower:
 2 "The next most common theme across the responses was
 3 that of planning and procedures in a variety of forms,
 4 contingency planning for the Council and Directorates,
 5 business continuity planning for Directorates and allied
 6 to this, the desire for staff to understand those
 7 arrangements and to be trained in them."
 8 Is that correct?
 9 A. Yes.
 10 Q. If we go back to 5.1, we see "Community Engagement".
 11 Scroll back down to 5.6:
 12 "It was clear from the response that the issue of
 13 community engagement and better working with community
 14 groups was important to staff. All suggested improved
 15 ways of working with K&C's communities must be found and
 16 common to this was the idea of establishing links for
 17 emergency working now and utilising community groups and
 18 their contacts and skills to respond [to] emergencies in
 19 future."
 20 Again, is that a valid observation?
 21 A. Yes.
 22 Q. Scrolling back up to 5.1 is "Volunteers", which refers
 23 to internal volunteers at RBKC and the ability to do so,
 24 which I'm not going to touch upon.
 25 The topic of leadership was also high in the list of

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1 respondents in the debrief. You have in fact exhibited
 2 this document, so you're familiar with it; is that
 3 correct?
 4 A. Yes.
 5 Q. Perhaps we could go to page 13 {RBK00068075/13}, please,
 6 which is annex A, where there was a number of annexes
 7 setting out different departments and what they say in
 8 their submissions, and I'm going to help us navigate
 9 because there's a lot of text here.
 10 If we go down to "Theme: Leadership", which is in
 11 blue, this is what it says:
 12 "The majority of comments focussed on the lack of
 13 direction and visibility of senior management
 14 immediately after the fire. Some comments indicated
 15 that this may have hindered the ability to provide an
 16 efficient, co-ordinated response to residents."
 17 That's the summary.
 18 A. Yes.
 19 Q. Do you agree with that summary?
 20 A. Yes.
 21 Q. These are some of the comments which come from RBKC
 22 staff within this report:
 23 "'... a sense of panic prevailed. Needed some clear
 24 positive and calm leadership.'
 25 Next comment:

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1 "'Senior leadership across the council seemed slow
 2 to co-ordinate action and make decisions. This meant
 3 that frontline staff were struggling to get answers to
 4 support questions or faced different responses depending
 5 who they talked to.'
 6 Something which you had touched upon:
 7 "'An immediate response on the ground. I felt it
 8 took too long to be deployed by which time we had lost
 9 the trust of the residents and community. Lack of
 10 leaders to send staff out in the first few hours.'
 11 Do you agree with that latter point?
 12 A. I think I've already stated that we — in hindsight, we
 13 should have been there earlier.
 14 Q. And that's something which is borne out in this report.
 15 And finally, the last two points:
 16 "Comments also indicated that the lack of
 17 communication between management and staff led to some
 18 staff being unsure of what they should have been doing,
 19 or how they could have helped more effectively.
 20 "'Work on your own intuition — if I had waited to be
 21 told by my manager to go and help, I never would have.
 22 We have a culture of being told what to do and that just
 23 crumbled in the wake of the fire.'
 24 Again, these are comments from members of RBKC which
 25 are collated into this report. Do you disagree with

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1 anything which is said there?
 2 A. I don't recognise all of it, I have to say. But this —
 3 the whole approach to do — to undertake this process
 4 was for it to provide the opportunity for staff to share
 5 their views in a very frank way.
 6 Q. Yes. And you've shared your views today.
 7 The last point I want to draw out is at page 15
 8 {RBK00068075/15}, please. It's under, "Theme:
 9 Co-ordination of Processes and Procedures", and if we
 10 see:
 11 "'Setting up the BEC was OK, but communications
 12 between the Town Hall and the Westway were difficult and
 13 uncoordinated. It needed a senior RBKC manager on the
 14 ground at the Westway to instruct BEC what was going
 15 on."
 16 What's your views in relation to that comment?
 17 A. I would agree with that comment. I mean, what I would
 18 say is I am aware that within the Westway during that
 19 first week, senior managers were deployed to the
 20 Westway, so it wasn't that there were no senior managers
 21 within the Westway during the first three days, but
 22 I don't think those senior managers were deployed to the
 23 Westway as soon as they should have been — as quickly
 24 as they should have been, and I think that was
 25 recognised within the Gold Group on the first day.

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1 Q. It continues, a summary:
 2 "Furthermore, some comments stated that it did not
 3 feel that any formal process or protocol was followed.
 4 "'At no time did it appear that we were following an
 5 emergency procedure that was already in place ...'
 6 Perhaps focusing on the last point:
 7 "'There needs to be a quick escalation to seek
 8 support from regional and central Government. This has
 9 been noticeably absent. I had thought that the Council
 10 would have contingency arrangements, that London would
 11 have another plan and there would be national plan.
 12 I saw no evidence of any.'
 13 Just using that term "escalation", we dealt with
 14 advice some time ago on 14 June that David Kerry gave to
 15 Nicholas Holgate that the incident was too big for RBKC
 16 to deal with on its own; finally, perhaps you have
 17 answered this already, but do you think that RBKC should
 18 have escalated sooner seeking support from London Gold?
 19 A. I think, as I mentioned earlier, I didn't — I wasn't of
 20 the view on the morning of the 14th, when I met with
 21 Nicholas, that necessarily London Local Authority Gold
 22 should be enacted at that point, but I was of the view
 23 24 hours later.
 24 MR KEATING: Okay.
 25 Mr Priestley, I'm very grateful for your patience.

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1 What we're going to do now is just pause for a few
 2 minutes. There may be some questions to consider from
 3 CPs or those who are watching.
 4 But perhaps, subject to you, Mr Chairman, we could
 5 come back in five minutes' time and see if —
 6 SIR MARTIN MOORE—BICK: Is five minutes going to be long
 7 enough, do you think?
 8 MR KEATING: I think we'll see. If I need more time, I can
 9 communicate.
 10 SIR MARTIN MOORE—BICK: We'll see, all right. Yes.
 11 Well, Mr Priestley, we have a break at this point to
 12 enable counsel to take stock, and also to allow other
 13 people to suggest questions that perhaps we should be
 14 putting to you. So we'll break now. We'll come back at
 15 12.55, and we'll see then whether there are more
 16 questions for you.
 17 THE WITNESS: Thank you very much.
 18 SIR MARTIN MOORE—BICK: All right?
 19 THE WITNESS: Okay.
 20 SIR MARTIN MOORE—BICK: Thank you very much. Would you go
 21 with the usher, please.
 22 (Pause)
 23 Well, taking you at your word, Mr Keating, we'll say
 24 12.55, but if you need more time, you can let us know.
 25 MR KEATING: Yes, thank you very much.

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1 SIR MARTIN MOORE—BICK: Thank you very much.
 2 (12.49 pm)
 3 (A short break)
 4 (12.55 pm)
 5 SIR MARTIN MOORE—BICK: Right, Mr Priestley. Well, we'll
 6 see if there are any more questions for you. All right?
 7 Yes, Mr Keating.
 8 MR KEATING: Just one topic to deal with, so I'm sure we can
 9 deal with it before the luncheon adjournment,
 10 Mr Priestley.
 11 It really follows on from that topic of escalation
 12 which we touched upon just a few moments ago:
 13 escalation, seeking external support such as
 14 London Gold.
 15 You'd given evidence that your view was by the
 16 morning of 15 June that RBKC needed that greater help.
 17 A. Yes.
 18 Q. You've told us that twice. Correct?
 19 A. Yes.
 20 Q. When you arrived in on the morning of 15 June and did
 21 your handover with David Kerry and saw the challenges
 22 which you faced, did you raise that view that you had
 23 formed with anybody?
 24 A. I didn't, no.
 25 Q. So not David Kerry, not Tony Redpath?

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1 A. No.
 2 Q. Not Nicholas Holgate?
 3 A. No.
 4 Q. Why did you not raise it?
 5 A. I didn't feel experienced enough to raise that.
 6 I didn't feel I had the experience to raise that to —
 7 and it would need to be to Nicholas. I didn't feel that
 8 I'd had the experience to be able to — this was my
 9 first incident. I'm inexperienced within this role.
 10 I didn't feel that I had the mandate or the place to say
 11 to the chief executive that he should change his
 12 tactics.
 13 Q. You mentioned your experience and we touched upon that
 14 already. You also mentioned deference earlier on in
 15 your answers to questions. Did you feel that that
 16 sort of deference was a factor which prevented you in
 17 your mind speaking up?
 18 A. Yes, I did.
 19 Q. Finally, Mr Priestley, is there anything else that you
 20 wanted to mention to the Inquiry in relation to events
 21 on 14 and 15 and 16 June thereafter which may be
 22 relevant to its enquiries?
 23 A. I wanted to express my sincerest condolences to the
 24 bereaved and survivors and the residents of Kensington
 25 and Chelsea, and everyone who's been affected by this

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1 tragedy. I've ... forgive me. I've devoted my entire
 2 career to serving the people of Kensington and Chelsea,
 3 and it's been an honour to do so, and it continues to be
 4 an honour and a privilege to do so. I'd like to
 5 apologise for my failings, and to say how very deeply
 6 and profoundly sorry I am about this incident.
 7 I haven't got anything else to say.
 8 MR KEATING: Mr Priestley, firstly, thank you so much again
 9 for attending and assisting us with our enquiries, and
 10 we're very grateful for your participation, and that's
 11 all we've to ask today.
 12 SIR MARTIN MOORE—BICK: Yes, well, Mr Priestley, it's right
 13 that I should thank you on behalf of all three members
 14 of the panel. We very much have been assisted by your
 15 evidence, it's very helpful to hear what you have to
 16 say, and so we're very grateful to you for coming along
 17 to tell us what you can.
 18 THE WITNESS: Thank you.
 19 SIR MARTIN MOORE—BICK: Thank you very much indeed, and
 20 you're now free to go.
 21 THE WITNESS: Thank you.
 22 SIR MARTIN MOORE—BICK: Thank you.
 23 (The witness withdrew)
 24 SIR MARTIN MOORE—BICK: Thank you, Mr Keating. We have
 25 another witness, but not until 2 o'clock; is that right?

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1 MR KEATING: That's correct.
 2 SIR MARTIN MOORE—BICK: All right, thank you very much.
 3 2 o'clock, then, please. Thank you.
 4 (1.00 pm)
 5 (The short adjournment)
 6 (2.00 pm)
 7 SIR MARTIN MOORE—BICK: Yes, Mr Keating.
 8 MR KEATING: Good afternoon, Mr Chairman. Could I call
 9 Rebecca Blackburn, please.
 10 SIR MARTIN MOORE—BICK: Thank you.
 11 MS REBECCA BLACKBURN (affirmed)
 12 SIR MARTIN MOORE—BICK: Thank you very much. Please sit
 13 down and make yourself comfortable.
 14 (Pause)
 15 All right. Yes, Mr Keating.
 16 MR KEATING: Thank you.
 17 Questions from COUNSEL TO THE INQUIRY
 18 MR KEATING: Firstly, Ms Blackburn, thank you so much for
 19 attending today and assisting the Inquiry with its
 20 investigations.
 21 Just a few introductory matters, if I may, which we
 22 say to all witnesses, but just to assist you, I hope,
 23 today.
 24 Firstly could I invite you to keep your voice up as
 25 best you can —

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1 A. Yes.
 2 Q. — so that the transcriber can catch your evidence.
 3 Also, it would assist if you don't nod or shake your
 4 head, but to say "yes" or "no" as appropriate, because
 5 it won't be captured on the transcript.
 6 A. Okay.
 7 Q. Lastly, if there's any difficulties with any of my
 8 questions, just let me know. Is that okay?
 9 A. Yes.
 10 Q. I should have said, if you need a break at any time,
 11 again, that's something which, if you let us know, I'm
 12 sure we can accommodate.
 13 A. Okay.
 14 Q. A couple of formal matters, just in relation to your
 15 witness statements. You have provided two witness
 16 statements to the Inquiry.
 17 Firstly, if we could go to {RBK00035364}, that
 18 should be on the screen right in front of you now,
 19 Ms Blackburn.
 20 A. Yes.
 21 Q. This is your first witness statement to the Inquiry and
 22 that's dated 17 January 2019.
 23 If we could turn to page 12, please, that provides
 24 the date I've just read out, your name, and could you
 25 confirm that's your signature?

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1 A. Yes, that is my signature.
 2 Q. Thank you.
 3 Secondly, your second statement, if we could go to
 4 {RBK00058170}.
 5 A. Yes.
 6 Q. If we could go to page 19, that's dated 13 May 2020.
 7 Again, your full name set out there. Could you confirm
 8 that's your signature?
 9 A. Yes, that is my signature.
 10 Q. Have you had the opportunity to read both those
 11 statements recently?
 12 A. Yes, I have.
 13 Q. Can you confirm that their contents are true to the best
 14 of your knowledge and belief?
 15 A. Yes.
 16 Q. Thank you.
 17 If we could have your first statement open, please,
 18 at paragraph 6 {RBK00035364/1}. I'm just going to ask
 19 you a few questions about your background and your role
 20 whilst employed by the Royal Borough of Kensington and
 21 Chelsea at paragraph 6. It's set out there from 2010
 22 until after this incident in September 2017, you were
 23 employed in the contingency planning unit; is that
 24 correct?
 25 A. Yes, that is correct.

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1 Q. You set out your studies pre-employment at RBKC. You
 2 have studied disaster management at the
 3 University of Coventry.
 4 A. Yes, that's correct.
 5 Q. And that's when, after graduation, you applied for and
 6 obtained a job as an assistant contingency planner at
 7 RBKC in 2010.
 8 A. Yes, that is correct.
 9 Q. And a year later you were promoted to the role of
 10 a contingency planning officer, and you remained in that
 11 post until your departure in 2017.
 12 A. Yes, that's correct.
 13 Q. Thank you.
 14 So at the time of the fire, you had approximately
 15 seven years' working experience in this field; is that
 16 correct?
 17 A. Yes, yes, that is correct.
 18 Q. Do you consider at the time of the Grenfell Tower fire
 19 that you were experienced in contingency planning in
 20 this field?
 21 A. Yes, I would say so.
 22 Q. In relation to the contingency planning unit which you
 23 worked in, there was three people there including you,
 24 isn't that correct, David Kerry and Keith Robins?
 25 A. Yes, that's correct.

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1 Q. Throughout your time at RBKC, was it the case that
 2 David Kerry was your manager?
 3 A. Yes, throughout, apart from I did do a secondment to the
 4 events team for I think about 18 months.
 5 Q. And your time within the contingency planning unit —
 6 A. David was always my manager, yes.
 7 Q. Yes.
 8 In relation to your working relationship, we've
 9 heard some evidence this morning about your working
 10 relationship with David Kerry. Was it a good working
 11 relationship?
 12 A. We had very different opinions in terms of how to get
 13 things done, I would say. I was more of a doer, more,
 14 like, once I've got an idea, do it, get it done, get it
 15 signed off, get it into action, whereas David was much
 16 more of a — he thought about things a lot more, he
 17 wanted to plan everything, he wanted to say one thing —
 18 or he wanted to do — he wanted to do things, but he
 19 always wanted to go the really long way round it.
 20 Whereas with me, as soon as I had an idea or noticed
 21 a gap or noticed anything was wrong, I wanted it filled,
 22 and I think that's where we differed.
 23 So where I was like, "There's a hole there, it needs
 24 to be plugged, this is how you do it", David was more,
 25 "Okay, you recognise this hole, now go and give me

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1 a million and one solutions to deal with this hole,
 2 I will take that million and one solutions somewhere
 3 else and get someone else to look over it", and that was
 4 where the difference — I would say the professional —
 5 the difference in professional was.
 6 In terms of the endgame, we both had the same
 7 endgame, but I was just very much more: if it needs
 8 doing, do it, rather than: let's just talk about it for
 9 about a year and then do something about it.
 10 Q. So you've described in detail the different styles you
 11 had —
 12 A. Yeah.
 13 Q. — in terms of how to work in that field. Did your
 14 working relationship impact the operation of the
 15 contingency planning unit adversely?
 16 A. No.
 17 Q. In relation to your role, can you tell me what your role
 18 specifically was back in 2017 in the department?
 19 A. In 2017, I — it's a long time now. I know I was
 20 doing — I was just about to start a brand new training
 21 and exercising programme. This is an example of the two
 22 different ways that we worked. I knew there was a gap
 23 there, so once I came back from secondment, I noticed
 24 that the number of BECC officers had dropped off, the
 25 amount of exercises that have occurred, they only took

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1 place in just the London ones, they didn't do any of
 2 their own, so I was like: well, this needs to change, so
 3 I said: I'll take charge of that.
 4 But then when I came back, we just had Unified
 5 Response, which, following that, there was going to be
 6 this whole new standardisation against BECC officers,
 7 and David had asked me to hold back on the training and
 8 exercising until that piece of work came out, because he
 9 said otherwise I'm just going to have to train them all
 10 over again.
 11 Q. Okay.
 12 A. However, in my opinion, that was then leaving a massive
 13 gap.
 14 Q. Okay. There's a lot there.
 15 A. Sorry.
 16 Q. Don't worry, we're going to cover it, and I'm going to
 17 pick up a number of things you said in the course of
 18 your questioning in perhaps the next half an hour or so.
 19 Is that okay?
 20 A. Okay.
 21 Q. So you mentioned your role and the areas that you were
 22 specialising in, and perhaps it would assist everybody,
 23 actually, to confirm when you returned back from your
 24 secondment.
 25 A. I think — I can't — it was after Notting Hill 2016, so

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1 it would have been either October or November.
 2 Q. Okay.
 3 So you returned back after your secondment, you
 4 described how there was issues in relation to BECC
 5 officers, a lack of capacity there —
 6 A. Yes.
 7 Q. — which we have heard about already.
 8 A. Yes.
 9 Q. Was that an area, in your view, of concern, that there
 10 was a lack of trained BECC officers?
 11 A. Yes. To be honest, I noticed it further back, because
 12 obviously we had the Olympics in 2012, and I did all the
 13 recruitment and training for the officers of the
 14 Olympics. I had a bank of — bearing in mind, they were
 15 getting paid, so more people did come forward, but we
 16 had a bank of about 25 trained officers all throughout
 17 the council. And then unfortunately I had to go off on
 18 maternity leave very quickly, came back from maternity
 19 leave, and again, that had gone down to eight.
 20 So from that twenty — and that's when I picked it
 21 up initially. So I did — it was picked up really,
 22 really early once I came back, and then that's kind of
 23 why I went on secondment, because I started making
 24 noises and they were like, "No, we'll just put you on
 25 secondment".

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1 Q. Well, let's -- I'm not ignoring that.
 2 A. No, I know, that's fine.
 3 Q. But let's put that in context.
 4 A. Okay.
 5 Q. In relation to the BECC officers --
 6 A. Yes.
 7 Q. -- you mentioned in 2012 they were paid --
 8 A. Yes.
 9 Q. -- as volunteers.
 10 A. Yes.
 11 Q. And the volunteers, as of 2017, and that reduced number
 12 of eight, were not paid.
 13 A. Yeah. Well, the plan was always -- because, as I said,
 14 the amount of training that we did for the Olympics, it
 15 was always to carry that on, because it was a lot. They
 16 knew exactly how to do it, they knew how to answer
 17 phones, they knew how to respond, they knew how to work
 18 the systems, so I said -- the plan was that although,
 19 yes, going forward they wouldn't get paid, but at least
 20 we've got that bank of people, and, to be honest,
 21 I don't know why that was never carried on.
 22 Q. Okay.
 23 Well, I want to deal with the topic of testing of
 24 emergency plans, and the panel have heard about the RBKC
 25 contingency management plan, which no doubt you're

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1 familiar with --
 2 A. Mm--hm.
 3 Q. -- and that that plan shall be exercised at least once
 4 annually to test and validate the activation of the
 5 plan.
 6 A. Yes.
 7 Q. There has been evidence heard in relation to that.
 8 Perhaps we could look at paragraph 12 of your
 9 statement {RBK00035364/3}, if we could scroll down to
 10 assist you:
 11 "Most boroughs undertake regular testing of
 12 emergency plans. This helps iron out any difficulties
 13 and ensures that everyone knows what to do. However, in
 14 my view, the Borough's plans had not been properly
 15 tested. We did not undertake sufficient large-scale
 16 emergency simulations. Instead, the CPU [contingency
 17 planning unit] held the odd mini-exercise."
 18 Was that the position?
 19 A. Yes, as I saw it, yes.
 20 Q. Is there anything else you wanted to expand upon in
 21 relation to why you considered the borough's plans had
 22 not been properly tested?
 23 A. From what I saw, once I came back from secondment,
 24 looking back through very little records that they had,
 25 the only exercises that I saw was Exercise Babble,

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1 I think it was, which I was still on secondment when
 2 that took place, so I didn't take place in that one, and
 3 all the others were just your regular Safe City,
 4 Connect, it was just the ones that LFB put on. There
 5 was no actual exercise that the borough put on
 6 specifically just to test their plans.
 7 Q. Yes. I think we know that Babble or Babel --
 8 A. Babel, yes.
 9 Q. -- was in, I think, November 2016.
 10 A. Yeah.
 11 Q. And you were still --
 12 A. Either way I didn't take part in it, so I think it might
 13 have been because I didn't -- wasn't included in the
 14 planning as well.
 15 Q. Okay. Okay.
 16 In terms of "the CPU held the odd mini-exercise",
 17 what did you mean by that, "the odd mini-exercise"?
 18 A. They're the small LFB -- so not your Safe City, I think
 19 it's Exercise Prepared, those ones.
 20 Q. We have heard a number of different labels of the
 21 exercises, but I think we know the ones you're talking
 22 about.
 23 A. Yeah.
 24 Q. It relates to information testing.
 25 A. It's the small ones that just test like the

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1 communication aspects.
 2 Q. I understand.
 3 A. Yeah.
 4 Q. In your second statement, which I'm not going to invite
 5 you to look at, you list six external exercises, largely
 6 organised through London Resilience, that RBKC
 7 participated in between 2015 and 2017. We have heard
 8 evidence in relation to those. But did you consider
 9 whether those were sufficient to ensure that RBKC's
 10 emergency plans were appropriately tested?
 11 A. If they were done properly, they would have been
 12 sufficient.
 13 Q. It begs the question: what do you mean if they were done
 14 properly? Was it not done properly in your view,
 15 RBKC --
 16 A. No, very often we did the very least we had to do. So
 17 whether it was just, "Okay, LFB want you to send in
 18 a sit rep at this time", that's what we'll do and that's
 19 us exercising, when it isn't, that's just us filling in
 20 a form and sending it off, looking like we're
 21 exercising.
 22 Q. Okay. Just exploring that for a moment, you're saying,
 23 "We do the very least".
 24 A. Yeah.
 25 Q. Was your view that RBKC in relation to those -- that

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1 participation, doing the very least — was it because it
 2 was capacity, was it attitude, was it commitment? What
 3 was it?
 4 A. I think it's a bit of all three, to be honest. So we
 5 did struggle with staff, you've heard that. We have
 6 had — we had a major issue with getting staff on board.
 7 Q. Yes.
 8 A. Also, I think there was a culture of not wanting to ask
 9 as well. So people were afraid to go, "Can you take
 10 part in this? This is why". No one really explained to
 11 anyone the benefits of why the contingency planning team
 12 was there. We were just there to maybe just put
 13 a bottom on a seat, that's how sometimes it came across.
 14 Because we weren't obvious enough, and we kind of kept
 15 in our own little department, and it was only when we
 16 went fully open—plan that people kind of even knew who
 17 we were. Before, we were in the annex, no one even saw
 18 us, I don't think anyone even knew we were there. So
 19 when we went open—plan it was a bit different, but
 20 I think at times David as well was afraid to ask.
 21 Q. Okay. I'm just going to explore some of what you said.
 22 So there was the visibility within the organisation.
 23 A. Yes.
 24 Q. You mentioned that contingency planning wasn't visible
 25 and there was a lack of — is this fair? — awareness

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1 of —
 2 A. Yes.
 3 Q. — who you were and what you did.
 4 A. Yeah. The only time people generally got emails from us
 5 was when we did our business continuity renewal, and
 6 that was an email with a form, fill it out, and then
 7 they never heard anything from us again until the
 8 following year, and I think that's the routine that that
 9 unit had got into.
 10 Q. You mention that there was a culture of not asking,
 11 wanting to ask.
 12 A. Yeah.
 13 Q. Are you talking about within your units where you
 14 worked, the three of you, that there was a culture of
 15 not wanting to ask —
 16 A. Yes.
 17 Q. Or are you suggesting it was wider than that within
 18 the council, the local authority as a whole?
 19 A. I think when I — because when I finally got out and
 20 spoke to people, everyone was more than happy to work
 21 with us. Whenever I put on the Notting Hill exercises,
 22 everyone was more than happy to work with us. So
 23 I don't think it was as a culture within the council,
 24 I think it was more — and a wrong perception from David
 25 that people don't — aren't willing to give up their

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1 time, because they were.
 2 Q. In relation to people not willing to give their time,
 3 was the position that RBKC didn't pay people, was that
 4 a factor in the lack of interest or ability to act as
 5 an RBKC volunteer?
 6 A. I think it did become a factor towards the end,
 7 especially when we was working so closely with
 8 Hammersmith and Fulham. Because they had a paid rota,
 9 and obviously officers speak to each other, they did
 10 work very closely, especially in the bi-borough waste,
 11 because a lot of their — the H&F officers were on that
 12 rota, getting paid for doing work in Hammersmith and
 13 Fulham, so when we or when they were asked to do RBKC,
 14 "Why are they getting paid? Why aren't we?"
 15 So I think the payment towards the end, but only
 16 when we started working more bi-borough. Before that,
 17 like I said, I just think David thought everyone was
 18 going to say no.
 19 Q. Okay.
 20 Well, we've explored, to an extent, what you've
 21 raised about concerns as to the lack of training and
 22 testing, and I just wanted to ask what the circumstances
 23 in which you raised this were. Who did you raise it
 24 with?
 25 A. I've raised it with every senior director that I've had,

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1 way back to when Graham was there, which is before
 2 Tony Redpath, I've raised it with Tony Redpath, I've
 3 raised it with Stuart Priestley, I raised it with the
 4 interim community safety officer, I think his name was
 5 David, he came from Redbridge, I raised it with him.
 6 I've raised it with everyone.
 7 Q. Okay.
 8 Obviously we have had Stuart Priestley who has given
 9 evidence.
 10 A. Yes.
 11 Q. And Tony Redpath was in his post at that time. In
 12 relation to perhaps those individuals later in your time
 13 at RBKC, focusing on those, what was the response when
 14 you raised this?
 15 A. The response from Tony Redpath, I remember it, it was
 16 when we had our new offices, so we were in this glass
 17 room, and I mentioned that we didn't have enough staff,
 18 we had not exercised enough, and I also said, "I don't
 19 think David could cope if we had a major incident", and
 20 his response was, "Well, he's been doing this job for
 21 this amount of years, he's the adviser to the LAP panel,
 22 he's this, he's a professional, he'll cope".
 23 Q. Do you recall your contact with Mr Priestley on this
 24 topic?
 25 A. Stuart just said he would raise it with David.

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1 Q. I promised I would return to what you mentioned earlier
 2 on, where you raised it and raised it and then they put
 3 you on secondment, I think you said after noise you
 4 raised.
 5 A. Yes.
 6 Q. I'm paraphrasing, perhaps, slightly.
 7 A. No, that's fine.
 8 Q. Did you want to expand upon that? How did that come
 9 about? You mentioned you raised these concerns and then
 10 you mentioned secondment. Perhaps you could —
 11 A. It was when we had the interim boss in, so David, who
 12 I can't remember his last name. It had become really,
 13 really sketchy between me and David, because I think
 14 I was so disappointed, after coming back from maternity
 15 leave, at how bad the department had got, I was being
 16 very vocal on how much we were lacking. Obviously
 17 no one wants that from a member of staff, and I think
 18 maybe sometimes I probably may have gone a bit about it
 19 the wrong kind of like — my Medwaynian way, so — and
 20 then it turned out that rather than addressing my
 21 complaints, they — the events team had a gap, I'd
 22 already done a lot of work with Notting Hill, obviously
 23 I'd done the Olympics, so it was kind of like it's
 24 a natural fit, and for me I was happy because it got me
 25 away from the team, because I wasn't happy, but it also

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1 stopped me from making noises at the same time.
 2 Q. Again, to put this into context, we've had a few
 3 significant time markers in your life: we've had the
 4 Olympics; you mentioned going off on maternity leave,
 5 which I think was after the Olympics.
 6 A. Yeah, literally just after.
 7 Q. And when did you return back?
 8 A. I didn't return back until July 2013.
 9 Q. July 2013.
 10 A. Yes.
 11 Q. And we know that you returned from secondment around
 12 October/November 2016, so can you recall when you went
 13 on secondment and for how long it was?
 14 A. I think it was April or May 2014.
 15 Q. Okay.
 16 A. Because I think it lasted — it was only meant to be
 17 a six-month secondment, but it kept getting made longer.
 18 Q. So we're looking at July 2013 to May 2014, return from
 19 maternity leave, raise your concerns, unhappy working
 20 relationship with David Kerry.
 21 A. Yes.
 22 Q. And for those reasons, it seemed — there was a gap in
 23 this other team, and it seemed that it was the right
 24 time for you to move across on a secondment.
 25 A. Yeah, it was an easy fit.

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1 Q. Is that a fair summary of the circumstances?
 2 A. Yes.
 3 Q. Okay. Then we know you come back 2016, and you've set
 4 out how things hadn't changed.
 5 A. No, nothing had changed; in fact, I think it had got
 6 worse.
 7 Q. And then you raise your concerns —
 8 A. Again, yes.
 9 Q. — again; is that correct?
 10 A. Yes, yes.
 11 Q. In your view, did a lack of testing and exercising of
 12 RBKC's plans affect the actual response to the
 13 Grenfell Tower fire?
 14 A. Absolutely.
 15 Q. In what sense?
 16 A. People weren't 100% aware of what they were doing.
 17 Also, I think we'd never done an out of hours activation
 18 exercise. So you've seen the contingency management
 19 plan many times over the last couple of days, and in
 20 there it's got a clear kind of diagram what you need to
 21 do, who you need to call and which route you go down.
 22 That was never exercised, and although that contingency
 23 management plan is updated every year, David when he
 24 first did the first one, which I can't remember which
 25 year the first one was, it hasn't changed since then.

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1 The activation process hasn't changed. So if you —
 2 I don't think they kept a record of what actually all
 3 the changes were, but those activation processes are
 4 exactly the same in 2013 as they were in 2017. They had
 5 never once been activated.
 6 So to see what happened then on the 14th isn't
 7 really a surprise, because yes, David wrote the plan
 8 himself, but he wrote it back in 2013. If that's not
 9 routinely exercised or routinely practised, then it will
 10 fall down and, in my opinion, I think that's where it
 11 was lost, Grenfell.
 12 Q. Okay.
 13 We'll come back to that question, perhaps, as we go
 14 through the evidence, and if there's anything else you
 15 think was significant, then we can touch upon it.
 16 I want to deal briefly, by overview, with the BECC
 17 training, and we have probably covered this already, but
 18 perhaps by summary, you were responsible for arranging
 19 the training of BECC officers; is that correct?
 20 A. Yes, yes.
 21 Q. You have mentioned the difficulties with recruitment.
 22 Am I right in understanding that when you returned
 23 back in November 2016, and you were trying to devise
 24 a new training plan —
 25 A. Yes.

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1 Q. — that was paused because of awaiting BECC
 2 standardisation?
 3 A. Yes. So I had already devised — and I think you've
 4 seen a copy of it — the actual training schedule, what
 5 units I was going to do, and I was in the process — I'd
 6 already done the first unit, which was the introduction
 7 to emergency planning, because what I always found with
 8 BECC officers was that they wanted to do it, but they
 9 didn't understand really why they were there, and unless
 10 you understand why you're actually in the room that
 11 you're in, and why you're doing what you're doing,
 12 you're never really going to fully apply yourself or
 13 fully understand.
 14 So my first unit, as such, was introduction to
 15 emergency planning, which told them all about
 16 the council, all about the bigger structure,
 17 understanding how they fit into other arrangements,
 18 understanding how they fit into the 33 London boroughs,
 19 and that I'd actually delivered, but then was told to
 20 pause before we go in to do the actual kind of
 21 logistical bit, like this person does this, this person
 22 does this, because of the standardisation.
 23 Q. I want to show you an email which may come somewhere in
 24 this sequence as you describe it.
 25 A. Okay.

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1 Q. It may be a little bit earlier in the sequence, but
 2 let's see. It's {RBK00068318}, please. So it's dated
 3 8 December 2016, you're back, from you to
 4 Stuart Priestley, "Training Schedule":
 5 "Hi Stuart
 6 "Here is the training schedule. On Monday I sent an
 7 email round to our current BECC officers and supervisors
 8 asking if they were happy to continue and when did they
 9 last receive training. 1 supervisor and 3 officers have
 10 dropped out.
 11 "The last training the officers can remember was the
 12 exercise that you were controller with in October 2015.
 13 Some officers have said to me they would not be happy to
 14 partake in another exercise without training."
 15 Does that assist you in terms of the circumstances
 16 that you were operating in at that time?
 17 A. Yes. So I had already written the training schedule
 18 that you've seen —
 19 Q. Yes.
 20 A. — sent that to Stuart, and it was after this that I did
 21 that first unit, because I said — because at the time,
 22 looking at — I think probably one of the LFB exercises
 23 was probably due to happen, because they did happen
 24 routinely twice throughout the year, and generally
 25 normally at the same time. So this would have been just

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1 as one of those exercises was coming up. And to be
 2 honest, they all did say that to me. They said, "How
 3 can we take part in an exercise if we haven't been
 4 trained?" Because I think from their point of view,
 5 even though we're not testing them, we are testing our
 6 procedures, it could be that we're setting them up for
 7 a fall, which obviously was never the point, because
 8 it's our procedures that we need to test, but they
 9 weren't willing — which made sense to me.
 10 Q. Okay. So from this email, which is November 2016, it
 11 appears that the last BECC training was in October 2015.
 12 A. That was the exercise.
 13 Q. That's the exercise?
 14 A. Yeah.
 15 Q. Well, "The last training the officers can remember was
 16 the exercise".
 17 A. Yeah, the exercise, yeah.
 18 Q. So both words are in there.
 19 Is it the case that the last training that they
 20 received — some of this was when you were on
 21 secondment — was back in October 2015?
 22 A. It could have been, yes.
 23 Q. So you've raised issues in relation to training and
 24 exercises. Did you think, as of June 2017, that the
 25 training and exercises available to the BECC officers

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1 was sufficient so that they were equipped to deal with
 2 the Grenfell Tower fire after —
 3 A. No.
 4 Q. One last matter, which is in relation to the minimum
 5 standards for London. Again, I think on Tuesday we've
 6 heard evidence in relation to this.
 7 A. Yes.
 8 Q. That it was a self-assessment which —
 9 A. Yes.
 10 Q. — was submitted by RBKC in 2016.
 11 A. Yes.
 12 Q. Probably in April 2016, so you were not there.
 13 A. Yes.
 14 Q. And the entry for training — we've heard this
 15 already — for RBKC was ranked as amber, operational but
 16 requires development, and there was a number of
 17 submissions in a spreadsheet —
 18 A. Yes.
 19 Q. — which we've seen, and it says, "training analysis is
 20 currently being updated", and, "Training is currently
 21 being reviewed and a new training analysis is being
 22 undertaken".
 23 When you came back from October/November 2016,
 24 you've mentioned doing some training analysis; was there
 25 a wider training analysis being undertaken —

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1 A. No, no, that's just words on a piece of paper.
 2 Q. I misheard what you said there.
 3 A. I said that's just words on a piece of paper. There was
 4 never a training analysis done, not from what I could
 5 see.
 6 Q. So when you returned back from October/November 2016, in
 7 your view there wasn't any substance to what —
 8 A. No.
 9 Q. — was submitted in the MSL?
 10 A. No.
 11 Q. I'm going to move on now to the response to the
 12 Grenfell Tower fire and events on 14 June, if that's
 13 okay?
 14 A. Yeah.
 15 Q. And in terms of headings to assist you, because we're
 16 not going to cover every single point —
 17 A. Yeah.
 18 Q. — but notification and early communications. So
 19 dealing with that heading first, subheading, is it right
 20 that David Kerry notified you of the fire by phone at
 21 5.20 on 14 June?
 22 A. Yes.
 23 Q. That's what you've set out in your statement at
 24 paragraph 16 {RBK00035364/3}.
 25 What did he say to you when he contacted you?

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1 A. "There's a fire in a tower block, it's not — it's bad,
 2 it's really bad", so I said, "What is it?", and he said,
 3 "It's a fire in a tower block, people are injured". He
 4 might have mentioned people had died. He said,
 5 "A rest centre's been opened", but he said, "Don't rush
 6 in, come in at 8.00".
 7 Q. You mention in your statement that he was at pains to
 8 stress that you should not rush in.
 9 A. Yeah, he did, he said, "Do not rush in, come in normal
 10 time, 8 o'clock".
 11 Q. Did you query that with him?
 12 A. Not at the time, because he told me it's a fire in
 13 a tower block. In London, a fire in a tower block is
 14 very different to a tower block on fire, which is
 15 obviously what it was. So for him to tell me it's
 16 a fire in a tower block, that in my head was: okay, may
 17 have implications for the people involved in the flat
 18 itself, and maybe the surrounding flats, or — and it
 19 could just be a large-scale evacuation of, say,
 20 a tower block. That's what I initially had in my head
 21 when he said a fire in a tower block.
 22 Q. Okay, and did he say whether he had contacted anybody
 23 else?
 24 A. He said that he'd phoned Elaine and she was on her way
 25 in.

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1 Q. That's Elaine Chumney?
 2 A. Yes.
 3 Q. BECC officer.
 4 A. Yes.
 5 Q. And in relation to Stuart Priestley?
 6 A. I don't think he mentioned him on the phone.
 7 Q. Okay. Is it right that towards the end of the
 8 conversation he said, "I'm still in my flat and I'll
 9 head into the BECC soon"?
 10 A. Yes, and he signed off with, "By the way, it's all over
 11 the news".
 12 Q. Okay, so what did you do after —
 13 A. Turned on the news.
 14 Q. Okay. And that's where your assessment —
 15 A. Yes.
 16 Q. — changed from fire in a tower block —
 17 A. Yes.
 18 Q. — as you described a few moments ago?
 19 A. Yes.
 20 Q. Do you think he should have contacted you earlier than
 21 5.20?
 22 A. He needed to have contacted someone. Whether that would
 23 have been me or not, I don't know, but he — the amount
 24 of stuff that he needed to do or the amount of calls he
 25 needed to make, not one person could have done that.

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1 Like I said, there's a clear activation protocol.
 2 Q. Yes.
 3 A. That was not followed, and because that wasn't followed,
 4 the right people weren't called in the right positions,
 5 and I don't think the scale of the incident had really
 6 drilled down on him. The fact that he told me it was
 7 a fire in a tower block, and then as soon as I turned on
 8 the news, I knew straight away that we were in trouble,
 9 because I knew if he had told — if he had given me the
 10 correct — or at least said a major incident or that ...
 11 it's, like, as bad as it is, then I would have kind of
 12 understood where he's coming from. But as soon as he
 13 said, "It's a fire in a tower block, it's all over the
 14 news", I turn on the news, I saw what I saw, I knew that
 15 the right people — that things were going to go awry,
 16 because the BECC should have been opened by the time
 17 he'd even — if things had been followed, the BECC
 18 should have been opened 3 o'clock, 4 o'clock.
 19 Q. Okay.
 20 I just want to draw out something from what you have
 21 said in your second statement, {RBK00058170/11},
 22 paragraph 5.1, please. Thank you.
 23 You say there:
 24 "I would have expected David Kerry to contact me or
 25 RBKC Contingency Planning Officer Keith Robins earlier

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1 to have assisted with making phone calls to BECC
 2 Officers, the onsite team and IT to establish the BECC."
 3 That's what you just said a moment ago.
 4 A. Yes.
 5 Q. It's the effect of that I'm trying to focus upon here —
 6 A. Yes.
 7 Q. — and your assistance:
 8 "As it was, David Kerry was performing the functions
 9 of Controller, managing the incident, and the BECC Duty
 10 Officer. I believe that David Kerry should have
 11 relinquished one of those roles, because the scale of
 12 the incident was such that one person alone could not
 13 discharge the functions of both Controller and BECC Duty
 14 Officer."
 15 A. And Council Silver all at the same time, I missed that
 16 bit in that bit.
 17 Q. Yes. So there's a lot of terminology there —
 18 A. Yes.
 19 Q. — and, to the layperson, it may not be immediate. What
 20 does that mean in essence?
 21 So he's in his front room, he's got his laptop open,
 22 one assumes.
 23 A. Yes.
 24 Q. And this is what's going on, and he is the BECC at that
 25 stage.

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1 A. Yes.
 2 Q. Where does controller, duty officer, Silver come in?
 3 Why is it too difficult for one person?
 4 A. Because of the — one, the amount of phone calls you've
 5 got. So what he needed to do was he needed to get
 6 a full bank — the full BECC up and running, with the
 7 officers, the information officers, a loggist set up.
 8 You can't do all that. Because of our systems, we don't
 9 have what's — as some other boroughs have, which is
 10 a text alert system. So as soon as an incident comes
 11 in, you press a button, everyone who is on this rota
 12 gets a text so they know that there's a chance that
 13 they're going to have to be called in. You can pre-set
 14 it so it says, "Please come to the Town Hall". We don't
 15 have that. The only way of us contacting people is by
 16 physically picking up a phone and dialling their number.
 17 If you're on the phone to someone, you can't then be on
 18 the phone to someone else who's maybe trying to get
 19 information to you.
 20 So, for example, if you take the Silver role,
 21 Silver, you're now in charge of that tactical element
 22 for the council. How can you do that at the same time
 23 as also trying to control the BECC, which is doing the
 24 phone call, making sure people are there, at the same
 25 time as also keeping an eye on the borough as well?

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1 Because I think Keith Robins was out of contact for some
 2 reason, so the only other — and I know that Nick Layton
 3 and Mike Rumble was at the scene, so David, by default,
 4 was also the duty officer at that time, because there
 5 was no one else to manage the borough, say, if something
 6 else popped up.
 7 So you can't — that's why I'm saying you can't be
 8 that person and do all those things all at the same
 9 time. One, you've only got one mobile phone, you've
 10 only got one line, so it was completely impossible for
 11 him to discharge all of his duties to his full ability
 12 if you're only doing it by itself.
 13 Q. So, on your account, by that decision, he's placed
 14 himself in an impossible position?
 15 A. Yes.
 16 Q. Shortly after your call with David Kerry at 05.20 —
 17 A. Yes.
 18 Q. — again, from your statement — we don't need to turn
 19 to it, it's paragraph 17 {RBK00035364/4} — at 05.50 you
 20 were contacted by Elaine Chummary.
 21 A. Yes.
 22 Q. And was it the case that she told you that two
 23 rest centres had been set up?
 24 A. Yes.
 25 Q. But she didn't know where they were.

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1 A. Yes.
 2 Q. I'm not going to ask you about the missing key, which
 3 we've heard a bit about that already, but I wanted to
 4 focus on one part of your conversation which you mention
 5 in one of your interviews you provided to RBKC, where —
 6 is it the case that she told you when she arrived,
 7 Elaine Chummary, at the Town Hall that she came across
 8 two people who were displaced by the fire?
 9 A. Yes, sitting on the steps of the Town Hall.
 10 Q. Okay. So she'd arrived earlier, so prior to this call
 11 at 05.50.
 12 A. Yes.
 13 Q. Two survivors from the fire were on the steps —
 14 A. Yes, that's what she — yeah.
 15 Q. — of the Town Hall, and this is what you say in your
 16 interview {RBK00029019/2}:
 17 "[They were] sat there on the steps that had been
 18 evacuated from the fire. She had to send them back to
 19 near the tower."
 20 A. Yeah, I think she sent them to one of the reception
 21 centres in the Uber that she got to the Town Hall. She
 22 put them back in the Uber and sent them to — because
 23 I think by that time she might have known where one of
 24 them were, I don't know. That's where I think she sent
 25 them back to.

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1 Q. That's why I wanted to clarify whether --
 2 A. Yeah.
 3 Q. You had the phone call. She didn't know at that time of
 4 the phone where the rest centres were.
 5 A. Yeah.
 6 Q. But she was sending people back to the locality. Was it
 7 the case, actually, that she was sending people back
 8 where there wasn't knowledge of where the rest centres
 9 were?
 10 A. To be honest, I don't know. She didn't actually tell me
 11 where she sent them back to, so ...
 12 Q. Okay.
 13 I'm going to move on to your arrival at the
 14 Town Hall.
 15 So you had these phone calls just before 6 o'clock
 16 in the morning.
 17 A. Yes.
 18 Q. You lived at that time some distance away from
 19 Kensington; in fact, you were in Kent; is that correct?
 20 A. Yes.
 21 Q. Is it right that you decided to leave early?
 22 A. Yes, yeah, as soon as I saw the news, I literally was
 23 up, out the door.
 24 Q. And you got there, doing your best, up, out the door, at
 25 7.20.

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1 A. Yeah, 7.20ish, yeah.
 2 Q. Yes. I'm quoting the time in your statement.
 3 A. Yeah.
 4 Q. Approximately then.
 5 Let's deal with the scene as you described it when
 6 you arrived at 7.20 at Kensington Town Hall.
 7 Was the BECC in operation?
 8 A. In the fact that there were people in there.
 9 Q. Okay, so it was operating. We'll talk about --
 10 A. Okay.
 11 Q. -- how well it was operating in a moment, but --
 12 A. Yes. There were people in there, yes.
 13 Q. Yes. How many people were there in the Holland Room?
 14 A. A lot.
 15 Q. A lot?
 16 A. Yeah, I would say about maybe 15 or 20.
 17 Q. How would you describe the room as you entered it in
 18 terms of the mood, the atmosphere, its operation?
 19 A. It wasn't great. No one knew what they were doing. You
 20 had Elaine at the back, writing on a whiteboard; you had
 21 people just sitting around; none of the computers were
 22 logged on, and if they were logged on, it was -- you
 23 just had the front screen, so nothing had been opened.
 24 Q. Pause there for a moment. Just dealing with the
 25 computers.

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1 A. Yeah.
 2 Q. So let's deal with the IT.
 3 A. Okay.
 4 Q. We have heard about the ILS.
 5 A. Yes. It couldn't be accessed.
 6 Q. It couldn't be accessed?
 7 A. No.
 8 Q. How clear are you about any issues with accessing ILS,
 9 the IT system, at 7.20 that morning?
 10 A. It happened all the time.
 11 Q. Okay, but did it happen on that morning of 14 June?
 12 A. Yes, yes. Every time we've set up the BECC for like --
 13 say if we were getting ready for an exercise, we always
 14 had to do it the day before, because you could never get
 15 into the ILS system, because you always had to go in,
 16 clear all the cookies or -- it was something technical,
 17 the IT team always used to do it, and then you'd have to
 18 re-log back in.
 19 Q. Okay. So the computers were on, as you describe, but it
 20 was only one screen that was visible?
 21 A. Yeah, it was just, as when you log on to a computer,
 22 it's your first screen that you see. It was that
 23 screen. And not all of them were logged into. I think
 24 only two were. You had Stuart at the back, he had his
 25 own work laptop, so he was fine, so he could access

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1 everything, but none of the others could.
 2 Q. We'll talk about the BECC log and what you did later on
 3 in a moment.
 4 A. Okay.
 5 Q. In a little while. But in terms of a BECC log being
 6 open and visible on the ILS, could you see any BECC log?
 7 A. No, no.
 8 Q. And, again, perhaps to explain to a layperson, how would
 9 anyone see whether a BECC log had been opened?
 10 A. First of all you need to log into the system, so you
 11 need to log into the ILS system, and it's that that we
 12 couldn't do.
 13 Q. Okay.
 14 A. So that's how I know that a BECC log wasn't open or, if
 15 it was open, it had been opened from somewhere outside
 16 of the BECC.
 17 Q. Yes.
 18 A. Because none of those BECC computers could log on to the
 19 ILS system.
 20 Q. You mentioned in relation to the IT that every time you
 21 did this in terms of exercises, you would have to set it
 22 up the day before.
 23 A. Yes.
 24 Q. So was it the case that there was a longstanding
 25 issue --

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1 A. Yes.
 2 Q. — in terms of the IT systems?
 3 A. Yes.
 4 Q. Had this been raised?
 5 A. Yes. Many times. Every time an exercise, always raised
 6 it with David.
 7 Q. I think we've seen an email where, perhaps a few weeks
 8 beforehand, there were efforts by Mr Kerry to try to
 9 change and get an upgrade in relation to IT.
 10 A. Yes.
 11 Q. Were you aware of that?
 12 A. I wasn't, actually, until I watched it.
 13 Q. Okay. But the issues were still occurring —
 14 A. Yes.
 15 Q. — on 14 June.
 16 I would like just — because I interrupted you as
 17 you were describing the situation when you went into the
 18 BECC, but perhaps there's a feature you could assist us
 19 with.
 20 If we open up your interview with RBKC,
 21 {RBK00029019}, and this is an interview which you
 22 provided to assist RBKC, it was on 23 March 2018. It's
 23 not a police interview or anything like this, it's
 24 something called Project Athena, and you were there and
 25 asked some questions.

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1 If we could turn to page 2 {RBK00029019/2}, please,
 2 the third paragraph, we see your description at the
 3 first sentence, third paragraph:
 4 "When I arrived at the Town Hall, I was trying to
 5 find out what was going on as it was complete
 6 pandemonium. There were lots of people there I didn't
 7 recognise ..."
 8 And it goes forward.
 9 A. Yes.
 10 Q. Is that an accurate description of how things were?
 11 A. Yes. Yes.
 12 Q. Did you consider that, although it was busy, it was
 13 an organised BECC and —
 14 A. It wasn't organised.
 15 Q. It wasn't?
 16 A. No. No. For a BECC to be organised, people need to
 17 have designated jobs, designated roles, they need to be
 18 allocated to certain phones, they need to know what
 19 they're doing, they need to — there needs to be a flow
 20 of information. People were picking up phones here,
 21 there and everywhere. The main people that were
 22 actually picking up the phones were Laura Johnson's
 23 housing officers, as they were the only ones in
 24 the council at that time, because she had already been
 25 proactive and got her officers already in, already

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1 ready. So they were actually being used not for the
 2 purpose of what they should have been used for, but they
 3 were being used there to answer the phones.
 4 So I would say, no, that's not an organised BECC.
 5 An organised BECC, you would have people there that were
 6 actually trained to be in that BECC.
 7 Q. Would a suggestion be that this is being a bit critical,
 8 that people were busy, doing their best, and it may have
 9 looked as you described it, but it was functioning
 10 appropriately?
 11 A. I don't think it was functioning appropriately because
 12 information was being missed. If it was functioning
 13 appropriately, when I walked in and asked someone,
 14 "Where are the rest centres? How many people have we
 15 got in them?", I should have been able to know that.
 16 Instead I got, "We think there's two or three, there
 17 might even be more, we don't know how many people are at
 18 each rest centre, there's no real way of finding out
 19 because we've got no staff on the ground", when in
 20 reality we had two LALOs at the scene. We didn't need
 21 two LALOs at the scene. One of those could have gone
 22 round to the rest centres to at least clarify which ones
 23 are definitely open, which ones are definitely shut, and
 24 how many people roughly are in each rest centre.
 25 Q. Okay.

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1 Just unpicking some of the things you said which
 2 covers some of my next questions, so I'm just going to
 3 go back a little bit in relation to what you said there.
 4 In terms of rest centres, the information was, "We
 5 think there's two or three, there might have been more",
 6 but there was no certainty as to the number of
 7 rest centres, nor how many people were in them?
 8 A. Correct.
 9 Q. How did you feel, in terms of someone who has experience
 10 in this field for seven years? You arrived at the BECC
 11 five hours into the incident had taken place, what was
 12 your assessment then?
 13 A. We'd already lost it by then.
 14 Q. Were you concerned?
 15 A. Yes.
 16 Q. It may have been touched upon already, but just by
 17 amplification, in terms of RBKC staff, you mentioned two
 18 LALOs at the scene, local authority liaison officers.
 19 A. Yes.
 20 Q. Was there anybody else at the scene at that stage?
 21 A. No.
 22 Q. I want to move on to just before 8.30. We know that
 23 there was an SCG, strategic co-ordination group,
 24 meeting, where Nicholas Holgate and others attended.
 25 Perhaps we could open up your first statement,

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1 please, at paragraph 21 {RBK00035364/5}. Thank you very
2 much:

3 "By 08:10, Nicholas Holgate and Tony Redpath were
4 inside the BECC. David [Kerry] and I had a meeting with
5 them."

6 Pause there for a second. I'm going to ask you
7 about that meeting. All right?

8 How would you describe the mood when the four of you
9 spoke? You were there, David Kerry and two senior
10 people, Tony Redpath and Nicholas Holgate.

11 A. I didn't say a lot. I was just there as David literally
12 grabbed me and went, "Rebecca, you need to come here",
13 and he said something about an SCG meeting that the four
14 of us need to attend. I did question whether I was the
15 right person to attend as I'd only just been there.

16 I didn't know anything, really, I only knew what was
17 written on the back of the room, the whiteboard, that's
18 all I knew. But David said, "No, you need to come and
19 attend", and we all went into a room.

20 Q. So before the SCG meeting took place, was anything
21 discussed amongst the four of you prior to the meeting
22 about the ability of RBKC to deal with the response?

23 A. Not that I can recall. Nothing that jumps out.

24 Q. Was there any discussion at that stage regarding getting
25 help outside of RBKC, including invoking the provisions

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1 of the London Gold resolution?

2 A. No, not before the SCG meeting.

3 Q. Not before the SCG meeting.

4 Was there a time when there was a discussion on the
5 morning of 14 June, can you recall?

6 A. The only time I can recall was further on in the day —
7 well, in the morning, when it became apparent that we
8 needed rest centre managers from H&F. That was the
9 first time it was brought up. But then in our
10 rest centre plan, that's one of our plans anyway.

11 Q. Sure.

12 A. Because we don't have any rest centre managers trained,
13 we relied on H&F anyway. It was kind of like a mutual
14 agreement that if we really needed them, we could rely
15 on them. There was no writ or formal, it was just
16 an agreement between two emergency planning teams.

17 Q. If we could turn to your second statement, please, which
18 is {RBK00058170/17}, paragraph 14.9. This hopefully
19 might assist your recollection. There was a lot going
20 on that morning. Paragraph 14.9.

21 A. So this meeting, which I didn't agree with, was held in
22 the BECC. So Nicholas chaired a meeting, held in the
23 BECC, where you've got phones going off everywhere, he's
24 told us not to answer the phones. Luckily it was a very
25 short meeting. I think the idea of the meeting — this

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1 was before the 11 o'clock Gold meeting.

2 Q. Okay.

3 A. So that's the timescale of it.

4 Q. Well, just pause there for a second. Let's read this
5 out so everybody can have the opportunity:

6 "I attended a meeting in the BECC chaired by
7 Nicholas Holgate. I believe this was on the morning of
8 14 June 2017. Nicholas Holgate mentioned he had
9 received a phone call from the CEO at Southwark Council,
10 who dealt with the Lakanal Fire, with the offer of
11 assistance. I recall that Nicholas Holgate told persons
12 at the meeting that RBKC was coping and outside help was
13 not required at that time."

14 So that just assists so we have the context.

15 You were mentioning that there was this meeting in
16 the BECC, the phones weren't being answered, you weren't
17 happy about the environment. Was it a long discussion?

18 A. No, it was very quick. I think the — I think what
19 Nicholas was trying to do was more rally the troops than
20 anything else, which is the only reason why I can see
21 why he'd have held it in the BECC, because there was no
22 other meetings held in the BECC because you don't — the
23 BECC's not a meeting room.

24 Q. Yes.

25 A. That's where we co-ordinate things, that's where we

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1 manage it, that's not where you have meetings. There
2 are meeting rooms all around it. So I think it was more
3 just like a rallying call that he got all the officers
4 at that time that was working in the BECC just to sit
5 down. I think it was only more — it wasn't more than,
6 like, five/ten minutes, it was a very short meeting, but
7 he did mention that he'd had this phone call, but he
8 thinks we're fine, and then he got up and went out.

9 Q. Okay. So, as you said, he had told persons at the
10 meeting that RBKC was coping —

11 A. Yes.

12 Q. — and outside help was not required at that time.

13 A. Yes.

14 Q. Was there anything else said that you consider relevant
15 in relation to this meeting?

16 A. Nothing that jumps out.

17 Q. Okay, thank you.

18 Let's move on now, please, to the 8.30 SCG meeting.

19 A. Yes.

20 Q. You had been pulled in. You described how you weren't
21 sure that you were the right person to be there.

22 A. Yes.

23 Q. And there were four of you from relatively senior
24 positions or those with expertise in the contingency
25 management field at that meeting.

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1 If we could open up your Project Athena interview
 2 again, please, {RBK00029019/2}, and it's the last line
 3 of page 2:
 4 "Obviously at that time the fire was still
 5 going ..."
 6 You're saying what was asked of you.
 7 A. Okay.
 8 Q. "... but what they mainly wanted to know from us was
 9 where our rest centres were and how many people we had
 10 at each of them."
 11 So that was the request which was being made. I'm
 12 pausing for a second. That was a request which was
 13 being made --
 14 A. Yes, they wanted to know where our rest centres were,
 15 how many people were in them -- yeah, that's what they
 16 wanted to know.
 17 Q. And "they" are the other callers on the SCG?
 18 A. Yeah, yeah, so that would be the chair of the SCG.
 19 That's what they asked us.
 20 Q. Yes, chaired by the MPS by that stage.
 21 A. Yes, yes.
 22 Q. And designed for building situational awareness --
 23 A. Yes, yes.
 24 Q. -- and co-ordination between different --
 25 A. Yes, because at the time, because the fire was still

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1 going on, that was still the main --
 2 Q. Of course.
 3 A. So they just wanted to get to know where everyone's
 4 going.
 5 Q. This is what you say {RBK00029019/3}:
 6 "When they asked, David just looked at me to answer
 7 them. So all I could do was tell them, look I've just
 8 walked in but this is what I know -- we've got rest
 9 centres at Portobello Rugby Club and St Clements and we
 10 don't have anyone on the ground at the rest centres yet
 11 but we have two LALOs at the scene. I asked David if
 12 that was right and he just mumbled something."
 13 Then you left the telecon at one point and went into
 14 the BECC.
 15 We can pause there for the moment.
 16 Is that right? Is that a summary of the position?
 17 A. Yes.
 18 Q. How confident were you at 8.30 --
 19 A. I wasn't.
 20 Q. I was just going to finish the sentence off, it may
 21 still be the same answer, but how confident were you of
 22 RBKC's understanding of what was happening on the ground
 23 at that stage?
 24 A. They weren't confident. They didn't know what was
 25 happening on the ground at that time. How can you, if

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1 you haven't got people there?
 2 Q. You say in your statement -- we don't need to turn to
 3 it -- that during this 08.30 meeting -- and it's alluded
 4 to in what we've just read a moment ago -- that
 5 Elaine Chumnerly again --
 6 A. Yes.
 7 Q. -- entered the room that you were in, listening and
 8 participating in a telecon, and said that she needed
 9 urgent assistance in the BECC more than once; is that
 10 correct?
 11 A. Yes, that's correct.
 12 Q. Did Elaine Chumnerly say why she needed urgent assistance
 13 in the BECC?
 14 A. Well, as I've said here, I did leave at various times
 15 and then come back in, and it was requests to -- we
 16 need -- I think one of the requests was getting the
 17 electoral roll, so we could find out who was there, who
 18 actually -- so we could get a picture of who was
 19 missing. That was -- I think that was one of the
 20 requests. Another one was about staff. When do we put
 21 the staff in? Which rest centres do we put the staff
 22 into? Another one was food and shelter. How do we get
 23 food to the rest centres? So it was the logistics of
 24 running a rest centre. That's what the council should
 25 have been doing that morning, was running those

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1 rest centres and making sure everyone and everything is
 2 in the right place, and they -- those were the requests
 3 that were coming in, and because at that time I think it
 4 was still Elaine, Anne Green might have joined her, who
 5 was another trained BECC officer, at that point, but it
 6 was just the two of them, and because we were all in
 7 this SCG meeting, there was no one in the BECC to do
 8 that quick-fire, "Right, this is who you need to call,
 9 this is who" -- because although both BECC(sic) and Anne
 10 were probably two of the most experienced and
 11 well-trained officers, and those I had retained from my
 12 Olympic days, so they've had a lot, lot of experience,
 13 they still don't know everything that we know in our
 14 heads, so that's why I think I shouldn't have been
 15 pulled into that meeting.
 16 Q. If we could scroll back to page 2 {RBK00029019/2},
 17 please, and the second-last paragraph. It's really
 18 following on from what you said. Second sentence:
 19 "Elaine just kept coming in and saying she needed
 20 someone in the BECC to help her because she didn't know
 21 what she was doing. But David was adamant that I had to
 22 stay in the meetings rather than go to assist Elaine in
 23 the BECC."
 24 Is that correct?
 25 A. Yes, yes. So at one point I did just get up and leave,

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1 I just ignored it, because I thought that was more
 2 important, because I think at the time it wasn't the
 3 local authority bit, so I thought it was a convenient
 4 time to exit the meeting, sort what I needed to sort out
 5 and then come back in.
 6 Q. Okay. So the time you were away, does it flow from what
 7 you're saying that there was a leadership gap in the
 8 BECC?
 9 A. Yes.
 10 Q. Generally, was there an issue regarding a lack of those
 11 who were senior members there to lead on 14 June?
 12 A. Stuart spent a lot of time in the BECC. I was pulled
 13 from meeting to meeting, from what I can remember,
 14 especially in that morning, because I had the 8.30 SCG
 15 and then Tony pulled me up to the 11 o'clock Gold
 16 meeting, and then I think I had the following SCG later
 17 in the afternoon as well. And I think Stuart remained
 18 mostly in the BECC. But I know that he was also —
 19 because he then got pulled into his Silver meetings —
 20 Q. Mass fatality —
 21 A. — and the mass fatality meetings as well, so when we're
 22 getting pulled this way and that way, there is no
 23 overall leadership in the BECC.
 24 Q. So bearing in mind the demands which were on you and
 25 your colleagues and the Council Silver, Mr Priestley at

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1 that time, was it the case that there just wasn't enough
 2 people to meet the demands which were on RBKC that
 3 morning?
 4 A. Yes.
 5 Q. I just want to move on now to the end of that meeting.
 6 I think you describe it in graphic terms in the
 7 Project Athena interview, that it was a long meeting,
 8 an hour and a half; is that a fair summary?
 9 A. From what I remember. It could have been shorter, but
 10 it did seem to go on for a very, very long time. So
 11 much so, there was — at one point me and Nicholas and
 12 Tony were all looking at each other going, "This needs
 13 to end", because we were fully aware we've got a council
 14 to manage.
 15 Q. Yes.
 16 A. And it was the longest SCG meeting. But I understand
 17 why it was so long, because they — like you said, it's
 18 to get the situational awareness, and that situational
 19 awareness comes from all of the responding agencies,
 20 so — but it got to a point where it was like: this
 21 needs to end.
 22 Q. I'm not seeking to be critical of the duration of the
 23 meeting, but the duration of the meeting helps us know
 24 what time you returned to the —
 25 A. Yeah, I think it roughly was. It was definitely over

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1 an hour, and not two hours, so an hour and a half would
 2 be —
 3 Q. So 9.30, probably closer to 10 o'clock —
 4 A. Yes.
 5 Q. — you returned back to the BECC.
 6 A. Yes.
 7 Q. And how was the BECC operating at that time? You have
 8 mentioned already, was there any change?
 9 A. I walked in. I had Laura and Ann just say to me, "We've
 10 got staff ready to deploy, can we deploy them", and
 11 I just said, "Yes", and they said, "Which
 12 rest centres?", and at the time I knew St Clement's and
 13 I knew the Rugby Trust, so I just said, "Have you got
 14 enough teams to send them to both?", so a full —
 15 a housing team and an adult social care, housing team
 16 and an adult social care, and they got sent to those two
 17 rest centres.
 18 Q. Okay, so —
 19 A. And that was at 10 o'clock.
 20 Q. So 10 o'clock you returned back.
 21 If we go to page 3 of your Athena interview
 22 {RBK00029019/3}, we see right in the centre:
 23 "And how did you lead the BECC?"
 24 This is what you say:
 25 "Well, at that time we were playing catch-up because

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1 the BECC was not set up as it should have been."
 2 Then you go on, and I think you say there that you
 3 spoke with Laura, that's Laura Johnson; is that correct?
 4 A. Yes.
 5 Q. And Ann Stuart, and there was an uncertainty — I'm
 6 summarising — in the BECC regarding which rest centre
 7 had the most people.
 8 A. Yes.
 9 Q. Is that correct?
 10 A. Yes.
 11 Q. In terms of resourcing, was it you who made that
 12 decision to send —
 13 A. Yes. Yeah.
 14 Q. How confident are you in your recollection that you
 15 deployed staff at 10 o'clock?
 16 A. Very confident.
 17 Q. Was it the case that Nicholas Holgate came into the room
 18 and set out a strategic —
 19 A. No.
 20 Q. — approach and deployed staff?
 21 A. No. No, they were still — so following the SCG
 22 meeting, the other three stayed in the room. They
 23 didn't even leave the room. I was the one that got up,
 24 went back into the BECC. So the next time I see
 25 Nicholas Holgate is when he comes in and gets everyone

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1 to sit down.
 2 Q. Okay.
 3 In relation to the timing of staff, we touched upon
 4 it already, 10 o'clock was when staff were deployed at
 5 the Town Hall to the locality. Do you think that was
 6 the appropriate time to deploy the staff?
 7 A. No.
 8 Q. When do you think staff should have been sent to the
 9 locality to give support?
 10 A. Early hours of the morning.
 11 Q. In terms of the responsibility, whose responsibility in
 12 terms of job role is it to deploy staff in that sort of
 13 situation to the scene?
 14 A. Because it's a rest centre, it falls mainly on the
 15 contingency planning unit. That's what we're there for.
 16 One of — the council's main role, we're not a blue
 17 light — although we're a category 1, we're not
 18 a blue-light service. What we're there to do is to look
 19 after the people, that's our main aim, is the people,
 20 and making sure the people are okay. Then, following
 21 that, we do all the other things surrounding, like the
 22 borough itself. But — so in an emergency situation, it
 23 should have been that BECC that was managing the
 24 deployment of staff. Yes, you could probably throw it
 25 out, "Oh, no, it should have been the senior management

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1 of housing, it should have been the senior management of
 2 adult social care". Not in that very start of the
 3 response. That very — the reason why there's
 4 a contingency planning team is not just to plan and to
 5 make sure all the documentation's in place, make sure we
 6 look good on paper, that's not just our role; our role
 7 is also when things like this happen, we then start that
 8 response, then the other services come in and then you
 9 work more as a collective body. But to start with,
 10 we're the ones that should have taken responsibility for
 11 it.
 12 Q. And in terms of those processes, the processes, the
 13 contingency management plan, Council Silver would be the
 14 person then, is it right, on your account, that should
 15 have deployed staff?
 16 A. Yes, yes.
 17 Q. BECC logs. We've touched upon it already. I just want
 18 to deal with a few things in relation to that.
 19 We know that David Kerry left the BECC to go home
 20 after working at 10.40 that morning. Were you aware
 21 that he'd started an emergency event log sheet?
 22 A. No.
 23 Q. No.
 24 We know that you commenced a BECC log by requesting
 25 Lorna Platt to do so at 1 o'clock and that one, on your

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1 account, had not been created beforehand; is that
 2 correct?
 3 A. Yes, that's correct.
 4 Q. I think formally you say in your second statement that
 5 it started at 13.18, checking —
 6 A. Yes, I think from checking the records, yes.
 7 Q. Can you say why there was a delay in setting up the log
 8 until 13.18 on 14 June?
 9 A. I asked initially, but because we couldn't get into the
 10 computers, that's why one wasn't set up. Then, like
 11 I said, because I was pulled from meeting to meeting,
 12 I think I tasked Anne with getting IT in to getting all
 13 the computers up and running, and by the time I was kind
 14 of back in the BECC, it was about 1 o'clock, all the
 15 computers were working, Lorna was there, and I just
 16 said, "We need to start a log".
 17 I didn't want to go back and retrospectively fill it
 18 in. Because of the scale of the incident, I don't think
 19 that would have been right for us to — which is why it
 20 starts at 1.00, because on — you have got the ability
 21 to retrospectively do the log, so you can — because
 22 you've got the ability to change times, so you can put
 23 in a log, although you might have put it in at 1.18, you
 24 can change it to make it — for it to say 10.30. But
 25 I didn't want to retrospectively do that because

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1 I wanted a true reflection of: this is when we started
 2 the log.
 3 I was aware that Stuart — not Stuart — no,
 4 I wasn't even aware that David kept one. I presumed
 5 David had kept one, and I did ask for it after the
 6 incident, after those first three days, but I never
 7 actually saw it until this process started.
 8 Q. So a log — we've heard a lot about them — creates
 9 an audit trail as well.
 10 A. Yes.
 11 Q. But is it also a way where tasks are kept track of as
 12 one goes along and it's populated and operated that way?
 13 A. Our one is, yes.
 14 Q. Yes.
 15 A. Some logs you can just have, "I did this, I did this,
 16 I did this, I did this", but because the way the system
 17 that we used, which is — I think it was based on
 18 SharePoint, looked slightly different, but you could put
 19 open and closed, you could say action and what the
 20 outcome was, and our log did have the ability to do
 21 that.
 22 Q. Would you consider it an important tool when there's
 23 multiple people working in an environment where there is
 24 new tasks coming in all the time?
 25 A. Absolutely.

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1 Q. Whilst we have this document open, if we could please go
 2 to page 4 {RBK00029019/4}, and just explore something
 3 you said in relation to the log. We see the question:
 4 "Some documents which I've seen are log books which
 5 were created by David Kerry Who started the log?"
 6 This is what you say:
 7 "I instructed Lorna Platt to start log about 2pm,
 8 either on 14th or 15th I can't remember. It was as soon
 9 as the government said we needed a public enquiry into
 10 the fire."

11 Pausing there for a moment.

12 A. Yeah.

13 Q. You're doing your best. This is in 2018.

14 A. Yes.

15 Q. We know that you started a log on 14 June --

16 A. Yes.

17 Q. -- and we know that the public inquiry was announced on
 18 15 June.

19 A. Yeah, so ...

20 Q. So that's -- you recognise the difficulty --

21 A. Yeah.

22 Q. -- with memory there.

23 I just want to explore a little bit more the passage
 24 you say that follows:
 25 "That was when the red light started flashing for me

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1 and I knew that we needed to log everything we did.
 2 I told Tony we were in trouble because we didn't have
 3 a log and we hadn't reacted quickly enough."

4 Do you recall when you had that discussion --

5 A. Yeah.

6 Q. -- with Tony?

7 A. Yeah, like I said, it was when the public inquiry was
 8 announced. So, like I said, my dates were off a bit
 9 there, I apologise for that.

10 Q. That's okay.

11 A. But, yeah, as soon as the public inquiry got announced,
 12 I mentioned it to Tony straight away, and I think what
 13 I'm implying there is the fact that we didn't start the
 14 log until 1 o'clock, not that, "Oh, now the Inquiry's
 15 started, we have to start a log". It was our log didn't
 16 start when the incident started. So those first
 17 actions, which are, in my view, probably one of the most
 18 critical ones, can't really be scrutinised because
 19 there's no, as you said, audit trail. So -- and that's
 20 what I said to him. That's what I was alluding to when
 21 I think I said that.

22 I apologise for getting a bit mixed up on dates and
 23 times.

24 Q. No.

25 What was Tony Redpath's response to you when you

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1 spoke on 15 June or thereafter, when you sort of said,
 2 you know, "We're in trouble because we haven't done
 3 everything as we should have done it", within the
 4 context as you described it? What was his reaction?

5 A. He said they wouldn't look into us, they'd just look
 6 into the cause of the fire.

7 MR KEATING: Okay.

8 Mr Chairman, that may be a suitable moment,
 9 a natural break.

10 SIR MARTIN MOORE-BICK: Is it suitable for you?

11 MR KEATING: It's suitable for me, thank you.

12 SIR MARTIN MOORE-BICK: All right.

13 Well, Ms Blackburn, we have a break during each
 14 session, and this looks like a good time to take the
 15 afternoon break, so we'll stop there. We'll resume at
 16 3.30, and while you're out of the room, please don't
 17 talk to anyone about your evidence.

18 THE WITNESS: Okay, thank you.

19 SIR MARTIN MOORE-BICK: Thank you very much.

20 (Pause)

21 Thank you, Mr Keating. 3.30, please. Thank you.

22 (3.15 pm)

23 (A short break)

24 (3.30 pm)

25 SIR MARTIN MOORE-BICK: All right, Ms Blackburn, ready to

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1 carry on?

2 THE WITNESS: Yes.

3 SIR MARTIN MOORE-BICK: Thank you.

4 Yes, Mr Keating.

5 MR KEATING: Thank you.

6 Ms Blackburn, we're going to turn to some more
 7 meetings.

8 You have mentioned in your statement that you
 9 attended both of the RBKC Gold meetings that day which
 10 took place at 11 o'clock and 3 o'clock; is that correct?

11 A. I think I got a bit confused. I think that it was the
 12 two Gold SCG meetings that I attended. I definitely
 13 attended the first 11 o'clock Gold meeting, but I know
 14 I'm not minuted, so I may not have attended that
 15 3 o'clock one. There was just so many meetings that day
 16 that I think, when going back through, I may have got
 17 the two Gold meetings mixed up.

18 Q. You're definitely not in the minutes as an attendee --

19 A. Yeah.

20 Q. -- for the 3 o'clock one, but you were asked in
 21 a subsequent question by the Inquiry in relation to that
 22 and believed you were, but --

23 A. Yeah, at the time I did, and then I realised I think
 24 I was talking about the other SCG meeting.

25 Q. I understand.

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1 A. Yeah.
 2 Q. Let's focus on the 11 o'clock meeting, if we may.
 3 Were you keen to attend that Gold meeting at
 4 11 o'clock?
 5 A. I don't think I was keen because I would have preferred
 6 to stay in the BECC, but if I didn't go, there wouldn't
 7 have been anyone else from emergency planning going, so
 8 it needed some sort of representation there.
 9 Q. Stuart Priestley was Council Silver, so he remained —
 10 A. He remained in the BECC, and I came up with
 11 Tony Redpath.
 12 Q. In terms of the meeting, the 11 o'clock meeting and any
 13 other RBKC Gold meetings which took place on the 14th
 14 and 15th, how would you describe the utility of those
 15 meetings? Were they useful?
 16 A. I think they were useful in the terms that other council
 17 staff were able to understand what was going on. In
 18 particular, the 11 o'clock one was helpful because I had
 19 no idea about the Westway Centre, and it wasn't until
 20 that 11 o'clock meeting where Sue Harris told me that
 21 the Westway Centre is now starting to be ramped up that
 22 I found out about it.
 23 Q. Was it possible that you heard about that before the
 24 meeting or is it your recollection it was —
 25 A. My recollection is that, because if you — because when

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1 I say, "Which rest centres are open?", that's when
 2 Sue Harris said, "Oh, also, the Westway Centre's also
 3 now started to be opened".
 4 Q. Okay. Let's look at those minutes, if we may. It's
 5 {RBK00013271}. We will see those open up, and we can go
 6 to the bottom of page 1., that's the part there where we
 7 see:
 8 "Two rest centres have been set up — Rugby
 9 Portobello Trust ... and the Clement James Centre."
 10 Just as you described it.
 11 "The Red Cross are at RPT. Managers were in place
 12 at all the Centres."
 13 And then it's this additional entry {RBK00013271/2}:
 14 "A further Rest Centre is being set up at Westway
 15 Sports Centre. The British Red Cross are on standby to
 16 go in."
 17 A. So that update actually came from Sue Harris. Although
 18 it's under my name, I think they probably put it under
 19 my name because it all comes under the same sort of
 20 emergency planning part of it, but the first time I knew
 21 about it was in that meeting and it was Sue Harris that
 22 told me that the Westway Centre was now being used.
 23 Q. Would you have expected to know, bearing in mind your
 24 pivotal position in the BECC, that there was another
 25 rest centre operating by 11 o'clock?

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1 A. I should have done, but I hadn't really spent any time
 2 in the BECC up until that point, because I'd always been
 3 from meeting to meeting. So this is what I'm saying in
 4 terms of not having me in the BECC, I was unable to get
 5 this overview. So that probably had gone through the
 6 BECC at some point that morning, I just hadn't seen it.
 7 Q. Yes. Okay.
 8 If we go down to the next bullet point:
 9 "No idea on the number of people in the rest centres
 10 but they are very busy."
 11 Is that correct?
 12 A. Yes.
 13 Q. What was the difficulty in getting accurate information
 14 of the numbers of people at the various rest centres?
 15 A. So at the time, going into that meeting, bearing in mind
 16 I only deployed the staff at 10 o'clock, I hadn't had
 17 any report of what's it like on the ground, because from
 18 10 o'clock, from then getting there, then me being
 19 pulled up to this meeting —
 20 Q. Yes.
 21 A. — I had no chance to liaise with anyone that's actually
 22 on the ground, the teams that had been deployed.
 23 Q. In terms of process of getting information from the
 24 ground, what would you have anticipated would have taken
 25 place, or did take place?

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1 A. In the end, we ended up getting the numbers from the
 2 teams that we sent out. What should have happened is,
 3 like as — I mentioned it earlier, about use of a LALO.
 4 You could have — we had LALOs, and I think we had Des
 5 on the ground at some point, I can't remember whether it
 6 was this early or not, going round and finding out
 7 numbers. Because unless you've got people on the ground
 8 that you can talk to, there is no way that you can find
 9 out what's in the rest centres.
 10 Q. We have heard that that LALO was deployed about
 11 2 o'clock.
 12 A. Yes. So at this point, the only people that would have
 13 been in the rest centres are the teams that I deployed
 14 at 10 o'clock.
 15 Q. In terms of registration of people who attend
 16 a rest centre, which would have been set up and managed
 17 and operated by RBKC, or at least taken over by RBKC,
 18 what was the process?
 19 A. In terms of adult social care and housing, I don't know,
 20 because I think they had their own process. The
 21 British Red Cross have also got their own process. As
 22 a borough, I don't think we had a process in terms of
 23 the actual emergency planning side of it. Other
 24 boroughs, they have already documentation, already
 25 printed out, already ready to go in a box you pick up,

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1 you take down to the rest centre and you start filling
2 it out.
3 From my time at RBKC, I think I only did one live
4 rest centre exercise, and that was with Hammersmith and
5 Fulham, so the documentation that we used was theirs, it
6 wasn't ours. So I may be wrong, we may have had
7 documentation, I was just not aware of it. But that's
8 how normally a rest centre works: you come in at the
9 door, you meet someone, they take your name and then you
10 sit down and then someone goes over to you, and then
11 they have that person-to-person conversation.
12 Q. As the specialist in this three-person team, would you
13 expect to know the process?
14 A. Well, I know the process —
15 Q. Yes.
16 A. — but I don't think we had our own process, because we
17 were so heavily reliant on British Red Cross, because
18 we — one thing we did not have was a rest centre team.
19 We had no one trained, no one staffed to go into
20 a rest centre. So in terms of our rest centre
21 exercises, it was very much reliant on
22 British Red Cross. British Red Cross did all the
23 documentation for us. That was one — that was part of
24 the memorandum of understanding, that the
25 British Red Cross does all of that, because we had no —

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1 because we didn't have a team, we didn't have the
2 documentation, we didn't —
3 Q. I understand.
4 A. — have any of that. Does that make sense?
5 Q. Yes, it does.
6 I just want to show you a document, and the answer
7 may be clear from what you've just told us, but it's
8 {RBK00058083}, please. So this is an assistance centre
9 manual, it's annex 14 to the CMP, the contingency
10 management plan, August 2014.
11 Just looking at the first page, do you recognise
12 this document?
13 A. Yes.
14 Q. We see in the top left people hearing high-vis jackets,
15 and perhaps that's a way where information is being
16 gathered as an illustration.
17 A. Yeah, in a rest centre, you've got the initial
18 registration.
19 Q. Yes.
20 A. Because what you don't do is as soon as someone comes
21 into a rest centre, you don't go, "Right, tell me your
22 name, tell me why you're here, tell me this, tell me
23 that", you don't spend that — the idea is you get them
24 in, get them sat down, get them with a cup of tea, and
25 then you go and talk to them. So it's not — you're not

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1 bombarding them as soon as they walk through the door.
2 Q. The impression from the evidence so far is that there
3 was a system where there was like a gatekeeper outside,
4 where registration would take place, and only if
5 somebody perhaps passed that were they allowed into the
6 Westway.
7 A. Yeah, I think, like, following what I read on, like,
8 reports on news, I think that's how it ended up being,
9 but that's not how a rest centre should be run.
10 Q. Okay.
11 Let's go to page 13, please {RBK00058083/13}.
12 I may have asked, and forgive me if I'm repeating
13 myself, are you familiar with this document?
14 A. Yes, yes.
15 Q. Yes. We see under 3.6, "Registration", it says:
16 "Once initial reception has taken place, arrivals
17 will be directed to the area designated for
18 registration."
19 As you described it.
20 "Registration is central to the operation of a rest
21 centre ..."
22 For the reasons why:
23 "■ Logistical planning for further welfare needs,
24 such as overnight accommodation and feeding;
25 "■ Identification of those with specific or urgent

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1 needs."
2 There is reference in this document about forms
3 being given to be taken to the location, a registration
4 form to be completed. It probably follows from what you
5 have said: are you aware whether any forms were provided
6 to the British Red Cross or was it on the basis that
7 they were going to do that, bearing in mind your
8 agreement with them?
9 A. I was always under the impression that it was the
10 British Red Cross. Bearing in — this document was
11 2014.
12 Q. Yes.
13 A. So it's probably quite old.
14 Yeah, I was always under the impression that it was
15 the British Red Cross that did all the documentation.
16 Never have I seen any council logo, council-branded
17 documentation in terms of rest centre.
18 Q. Perhaps we could just go to page 15 {RBK00058083/15},
19 and there is a visual demonstration of —
20 A. H&F one. That's the one I've seen. That was the
21 live — that was the one we used when we did that live
22 exercise. But, like I said, it was in conjunction
23 with —
24 Q. Hammersmith —
25 A. — H&F, and H&F have their own rest centre — they don't

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1 rely on the British Red Cross. Like they've got their
 2 welfare officers and their Bronze officers, they've also
 3 got a rest centre team also on standby. So that's why
 4 they're very different, because this document does look
 5 very, very similar to the H&F version of this.
 6 Q. Yes.
 7 A. So this is where the two boroughs are slightly
 8 different. Because we don't have our own team, yeah,
 9 we've got H&F's documentation, but I've never seen,
 10 like, an RBKC version of this.
 11 Q. I understand.
 12 In terms of the evidence, you have mentioned that
 13 you have been following the evidence, and you may recall
 14 yesterday evidence in relation to British Red Cross and
 15 their experience of completing registration forms at the
 16 scene in triplicate and providing copies to RBKC at the
 17 Westway, and the discovery that some of those forms
 18 which were provided to RBKC at the Westway were left
 19 unattended in a box. Do you recall that evidence?
 20 A. Yes.
 21 Q. I've done it in a short way, but you mentioned you've
 22 covered it and we read out a statement yesterday and
 23 today in relation to that.
 24 Were you aware of any concerns being raised at the
 25 BECC, to the BECC, from British Red Cross on 14 or 15 or

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1 16 June?
 2 A. No. No, nothing came across. The Westway — once the
 3 Westway was properly established, it was more taken kind
 4 of away from the BECC a little bit, because it was
 5 managed by — I think Sue Harris managed it, partly. We
 6 did the rota for the Westway, we made sure there was
 7 a senior manager in there, but in terms of the actual
 8 like minute-by-minute management of it, I don't recall
 9 seeing that much coming through the BECC on —
 10 especially on the 14th and even on the 15th or 16th.
 11 Q. Okay.
 12 I'm going to move on to the 1400, 2 o'clock, SCG,
 13 strategic co-ordination group, meeting, and you attended
 14 that one —
 15 A. Yes.
 16 Q. — with Tony Redpath and Nicholas Holgate.
 17 Perhaps we could open paragraph 24 of your statement
 18 {RBK00035364/6}, the second sentence:
 19 "After the next SCG meeting, Tony Redpath and
 20 Nicholas Holgate discussed when control of the 'major
 21 incident' would be handed over to the Borough. The
 22 feeling was clear, the Borough was not ready to take
 23 control. They postponed the decision."
 24 So just explore that for a moment. Perhaps we don't
 25 need to look at the SCG minutes, but is it right that

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1 there was discussion at the SCG that it was coming at
 2 a time where RBKC would take over the lead of the
 3 recovery co-ordination group?
 4 A. Yes. So it was — I think the fire may just have been
 5 put out, or it was getting to that point, and so once
 6 the emergency services had done their bit, then it falls
 7 to the council, the local authority that's in charge of
 8 the incident, to then take the lead in terms of
 9 recovery, and that was discussed.
 10 Q. Yes. And this point here, we've got emergency
 11 response —
 12 A. Yes.
 13 Q. — response, and then it moves to recovery.
 14 A. Yes.
 15 Q. And recovery would be the local authority's
 16 responsibility.
 17 A. Yes.
 18 Q. And there would be a recovery co-ordination group in due
 19 course —
 20 A. Yes.
 21 Q. — which they would lead.
 22 A. Yes.
 23 Q. This is what we're dealing with.
 24 A. Yes.
 25 Q. In relation to that, "The feeling was clear, the Borough

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1 was not ready to take control", was that an internal
 2 discussion amongst Tony Redpath and Nicholas Holgate?
 3 A. Yes. They said that the emergency services are still
 4 on site, it's not recovery phase yet, we're still in the
 5 response phase. That was their decision, and that was
 6 that.
 7 Q. If we could move on towards the end of the day. You've
 8 already commented upon how you thought RBKC were
 9 performing that day, and we know that you worked late
 10 that night.
 11 A. Yes.
 12 Q. And you worked to 11.00/11.30.
 13 A. Yes.
 14 Q. Having left the house around 5.45 in the morning.
 15 A. Yes.
 16 Q. And travelled the whole way back.
 17 A. Yes.
 18 Q. And got up early so that you were back at the Town Hall
 19 by about 6.30 the next day —
 20 A. Yes.
 21 Q. — on 15 June.
 22 A. Yes.
 23 Q. Whilst you were away for that short period of time,
 24 David Kerry had been on duty overnight; isn't that
 25 correct?

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1 A. Yes.
 2 Q. How would you describe the BECC on your return on
 3 15 June?
 4 A. It looked exactly the same as when I left it at
 5 11 o'clock the previous evening.
 6 Q. What was your expectation on 15 June of how it should
 7 be?
 8 A. Well, I would have expected, as it is a quieter time,
 9 it's not — there were still going to be things going
 10 on, and I did ask David to finish doing the rest centre
 11 rota as well, but I would have expected maybe the log to
 12 be prettied up, go through actions, have a strategy for
 13 the day, so we walk in, we know what's outstanding,
 14 what's not outstanding, what direction we need to take.
 15 We know that we still had people that needed
 16 temporary accommodation. It would have been useful if
 17 they could somehow look through the emails and see if
 18 there was any emails that had been missed. There was
 19 a lot of emails going into that BECC email, and like
 20 I said with the British Red Cross, they may have emailed
 21 the BECC, I may have missed it. So that's kind of what
 22 I was expecting.
 23 I was also expecting people to have the new BECC
 24 rota. We knew who was coming in, we'd already allocated
 25 the staff, but they should have been given roles, they

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1 should have had clear roles, so when the next member
 2 came in, "Okay, you're the information officer for the
 3 day, you'll be sitting here, this is your phone", and
 4 then, "Okay, you're the loggist for the day". That's
 5 what I was expecting.
 6 Q. Okay. So, again, a lot in there, but, in essence, there
 7 was no allocation of roles, I think that's something you
 8 mention in your statement and a moment ago; issues
 9 regarding the rota not being done; a realisation that
 10 there was emails which had been missed —
 11 A. Yes.
 12 Q. — and that being something of concern.
 13 A. Yes, because anything could have been in those emails,
 14 so ...
 15 Q. You mention on 14 June that you felt that because the
 16 BECC was set up late, you were always behind and chasing
 17 to catch up.
 18 A. Yes.
 19 Q. Did you think by the morning of 15 June that the BECC
 20 and RBKC were back on track?
 21 A. No.
 22 Q. During the day of 15 June, did you feel that there was
 23 sufficient senior RBKC staff around in the BECC to
 24 support you?
 25 A. I don't remember seeing Tony or Stuart in there for

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1 longer than maybe ten minutes at a time.
 2 Q. And the reason why they weren't in there, does it follow
 3 that they were at other meetings or being —
 4 A. I think they were at other meetings, because I think
 5 Mark Sawyer came in and I think another person might
 6 have come in, and they just went off to meetings, came
 7 back, went off to meetings, without actually giving us
 8 anything.
 9 Q. When you say "giving us anything", what do you mean by
 10 that?
 11 A. Like an update or where we are, what our focus is, what
 12 our strategic focus is, what our tactical focus is.
 13 That wasn't given to us. It was: no, there was
 14 a meeting going on over there with maybe — I think even
 15 Tony Andrews came in from Westminster, maybe — I might
 16 have got that one wrong — but there were so many people
 17 that just come in just for a meeting and then left
 18 again, and ...
 19 Q. So you describe a lack of direction —
 20 A. Yes.
 21 Q. — is that fair? — from more senior people.
 22 You were not Council Silver; is that correct?
 23 A. No.
 24 Q. So you were not the tactical lead.
 25 A. No.

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1 Q. Was the absence of the Council Silver an issue? Did it
 2 have an impact on the performance of the BECC on
 3 15 June?
 4 A. I think it did, because we didn't really know where our
 5 focus was, because our focus at that time still should
 6 have been probably finding accommodation for those that
 7 still needed it, and I know that Laura's team did
 8 an amazing job trying to do that, but at any one time,
 9 if someone came in to me and said, "How many people are
 10 still without accommodation?", there was no way that
 11 I would be able to give them an answer, because I didn't
 12 have that information. That information was being fed
 13 to Stuart and Tony but wasn't being fed back down, and
 14 I think that's where the BECC lost its role. Whereas if
 15 we had Council Silver at least either adjacent to the
 16 BECC — like fair enough, the BECC can be quite noisy,
 17 it can be quite problematic, definitely if you're on
 18 phone calls all the time.
 19 Q. Yes.
 20 A. But there were enough empty offices near the BECC,
 21 because the Holland Room was in a whole suite of
 22 offices. There were enough where you could have
 23 positioned yourself where you are still in touch with
 24 the BECC but — so you're able to feed information into
 25 the BECC, but not physically always be there, but know

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1 that if I needed them, I know where they were.
 2 Q. I'm just going to move on to staffing and issues in
 3 relation to sourcing staff. That was one of your
 4 principal tasks you set out in your first witness
 5 statement on 15 June, was trying to source staff from
 6 neighbouring boroughs.
 7 A. Yes.
 8 Q. Is it fair to say that, in your view, RBKC didn't have
 9 sufficient staff themselves to man the BECC or, indeed,
 10 the rest centres?
 11 A. We definitely didn't have staff to man rest centres. We
 12 did have the housing and adult social care officers,
 13 those we did have, but what we didn't have was what the
 14 role the British Red Cross does. That was where we
 15 lacked in staffing of a rest centre.
 16 In terms of the BECC, I think we exhausted our
 17 staff. Because we had such a small pool to pull in from
 18 anyway, I think we exhausted it by the night of the
 19 15th, which is why I think Louise was called in to help
 20 with the overnight, and it wasn't until Louise came in
 21 that the BECC started doing what probably a BECC should.
 22 Q. So these staff issues were building during 15 June.
 23 I think you used a phrase in your Project Athena
 24 interview that your BECC staff were "dead on their feet"
 25 by then.

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1 A. Yes, because some, like me, had worked consec — like,
 2 day shifts and long hours as well.
 3 Q. David Kerry was not there during the day on 15 June.
 4 You were. You were having contact with Tony Redpath at
 5 times and Nicholas Holgate. Were there any discussions
 6 with them regarding perhaps seeking assistance from
 7 other local boroughs or activating the London Local
 8 Authority Gold?
 9 A. There was, after I think it was the 11 o'clock SCG
 10 meeting on the 15th.
 11 Q. Yes.
 12 A. Again, the recovery was — because we're now a day —
 13 like, day one from the fire, so it should be the local
 14 authority starting to take control. The main issues
 15 that were left are the people, are the response to the
 16 people, so we were the ones that were responsible for
 17 them and we were the ones that had the ability to be
 18 able to sort that. So that should have been when we had
 19 taken control.
 20 We were in no position to take control. Not through
 21 lack of experience, I think our housing team and adult
 22 social care team, they were slowly running out of staff
 23 and slowly running out of energy, I think, but they kept
 24 going, but I think where we really, really lacked is
 25 probably lack of strategic overview. Mainly from the

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1 directorate that I worked in, the corporate services
 2 directorate, I think that's where we lacked both
 3 experience, skills and, I think, overview of how serious
 4 it still is. Even, I think, day two, it still wasn't
 5 recognised, which is why I said we're not going to cope.
 6 Also, the BECC staff would never have kept going.
 7 Q. Okay, pause there. Again, a lot in there and I want to
 8 ensure I understand your evidence.
 9 So your view was, in terms — you mentioned moving
 10 to sort of recovery —
 11 A. Yes.
 12 Q. — where the local authority would take charge, and it
 13 was already the next day.
 14 In general terms, from your experience in that
 15 field, would you expect by the second day that it moved
 16 from response to recovery?
 17 A. Yes, because all the impacts were recovery. So the
 18 BECC — one of the BECC's main things was the waste
 19 clearance and trying to clear the site, and again,
 20 that's a recovery phase.
 21 Q. Okay.
 22 Let's look at paragraph 37 of your statement, which
 23 we have open, but if you could scroll down, please, it's
 24 on page 8 {RBK00035364/8}:
 25 "During the day, I spoke to Tony Redpath and

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1 Nicholas Holgate about when responsibility for managing
 2 the incident would return to the Borough. I suggested
 3 that they seek assistance from other London boroughs
 4 invoking London Gold."
 5 This is where you say:
 6 "Nicholas told me that he had received an e-mail
 7 from the Chief Executive ... I had the impression that
 8 senior management at the Borough were reluctant to seek
 9 mutual aid, despite the fact I had advised
 10 Nicholas Holgate and Tony Redpath to activate
 11 London Gold after the Gold meeting. They had said they
 12 wanted to speak to David when he returned."
 13 So two things.
 14 Firstly, you were clear in your advice that they
 15 should, by 11 o'clock, activate London Gold, the Gold
 16 resolution?
 17 A. Yes.
 18 Q. And the reason why?
 19 A. We just weren't coping.
 20 Q. Or able to cope going forward?
 21 A. No.
 22 Q. And you set out your impression that they were reluctant
 23 to seek mutual aid/activate the London Gold resolution.
 24 Why did you form that impression? Was anything said
 25 which made you form that impression?

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1 A. Well, what was said to me the day before when — with
2 that — I've referred to an email that time where,
3 again, you've got another chief exec offering support
4 and Nicholas has turned it down.
5 Also, they both said, "No, we can manage". That was
6 their — and I don't think either of them saw maybe what
7 we saw on the ground, or just chose not to see it, that
8 we weren't coping. We didn't have staff numbers. Like
9 I said, I have been in that BECC for two days and
10 I wouldn't have been able to give you a clear picture of
11 what was happening on the ground, and that shouldn't
12 have been the case. I should have been able to roll off
13 what's going on, where is where, who's where, who needs
14 help, who doesn't need help, who's got help, and
15 I couldn't have done that, because I think — and I've
16 mentioned it before, I think it was that failing in
17 those first few hours that caused it, and with
18 an incident such as this size, if you lose it at the
19 start, it's very difficult to get back, and I think —
20 it's my opinion, and I think that might be why they were
21 so reluctant to get help, because as soon as you open
22 your doors, you're also — as well as accepting help,
23 you're accepting scrutiny as well, and I don't think
24 that was something that they wanted.
25 Q. Okay. Just pause there for a second, because I'm going

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1 to give you an opportunity to assist us with one other
2 aspect.
3 Could we look at {RBK00029019/5}, please. This
4 should be your Athena interview. Second—last paragraph.
5 "I was sorting out the staffing in the rest centres", is
6 the paragraph we're looking at. You mention
7 Mark Sawyer, who we have heard about already, and it's
8 the next sentence:
9 "On 15th June, I think after the SCG meeting someone
10 asked do we need to ask for any help from elsewhere?
11 And everyone said no we're fine! Nicholas Holgate and
12 Tony Redpath said that. After that meeting finished,
13 I asked them about pressing the button on handing over
14 to London, but they said no, we don't think we're there
15 yet."
16 Does that assist your recollection?
17 A. Yes, yeah.
18 Q. And is that correct?
19 A. Yeah. They thought they were coping. They thought they
20 could cope.
21 Q. In terms of Mark Sawyer, he was present that day on
22 15 June, coming down to provide advice and assistance,
23 and we'll hear from him in due course. Was he somebody
24 who was present at the time of this conversation?
25 A. No.

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1 Q. Whilst we have this open, perhaps we could look at —
2 there's a reference to Mark Sawyer. In fact, it's just
3 above what we have been looking at:
4 "Mark Sawyer from LRT ..."
5 Do you mean London Resilience?
6 A. Yes, yeah, London Resilience team, I think I put him
7 down as.
8 Q. "... came in to help Nicholas Holgate manage things.
9 I don't know what his role actually was because he
10 didn't help me at all. He was there to advise Nicholas
11 but didn't do so in the right way."
12 We've got that in front of us. Perhaps you could
13 try and clarify that or assist us.
14 A. I think the reason why I've put that is because I would
15 have thought he would have come in and gone, "You're not
16 coping, you need help", and then obviously having
17 a meeting, after Mark had clearly had a meeting with
18 Nicholas, for then Nicholas and Tony to say, "No, we are
19 coping fine", that's where that's come from. I would
20 have thought he would have come in, looked around —
21 I think I — in evidence yesterday it was noticed that
22 he did say the BECC was failing, and if the BECC was
23 failing, why didn't he push further on us seeking more
24 help?
25 Q. Well, we can explore that in due course, but you have

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1 expressed your opinion there.
2 I'm going to move on to — in terms of the
3 London Gold resolution, we know that was formally
4 activated on the afternoon of 16 June, with a request to
5 activate made on the afternoon/evening of 15 June.
6 A. Yeah, I didn't know that.
7 Q. But what you do say in your statements — and I'm not
8 going to refer you to it, but you did say this:
9 "The quality of the response changed markedly."
10 Is that correct?
11 A. Once we got taken over and moved to Westminster, so it
12 wasn't on the 15th.
13 Q. No.
14 A. It was after — once we had moved the BECC, moved all
15 operations, was completely operating out of
16 Westminster Council, that's when it changed.
17 Q. And was it immediate, the change, the improvement on the
18 afternoon of 16 June, or did it take a period of time
19 for an improvement to —
20 A. Well, I wasn't there on the 17th, which was the
21 Saturday, because I got told to take a day off, so
22 I didn't go back in until the afternoon of the Sunday,
23 and that was when everything had changed, all the mini
24 groups had been set up, they'd all had their own little
25 room, the meeting rooms, things were being co—ordinated,

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1 you had a central hub. So that's the big change. You
 2 hadn't just had one person over there in this council
 3 office in RBKC doing this, this person doing this, and
 4 then maybe not talking, everything was centralised, and
 5 that's what made the difference.
 6 Q. So the phrase you use, "big change", and that was
 7 something which was evident to you by the Sunday?
 8 A. Well, also staffing levels. So as soon as you pressed
 9 that button, so to speak, you've got 33 London boroughs'
 10 worth of BECC staff, so you can staff a BECC for almost
 11 as long as you want when you've got that amount of
 12 staff. When you've only got five, six, seven or
 13 eight — I can't remember how many we had — you're
 14 never going to — you're only going to last — with you
 15 going on 12-hour shifts, you're only going to last
 16 three days at most.
 17 Q. In terms of scalability, massive difference.
 18 A. Massive difference.
 19 Q. Okay.
 20 I'm going to move on to the final part, which is
 21 assessment of the adequacy of the response, which you
 22 have touched upon, actually, throughout your evidence.
 23 A. Yeah.
 24 Q. Perhaps we could refer to your first statement, please,
 25 {RBK00035364/11}, paragraph 52, please. You say, under

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1 "Assessment: Adequacy of the Response":
 2 "I am left with the sense that the Borough did not
 3 react quickly enough. Perhaps, with hindsight, the
 4 magnitude of the incident was not grasped at the outset.
 5 As soon as David Kerry received the call, he should have
 6 alerted all BECC officers and ensured that we were
 7 immediately called into [Kensington Town Hall]. I do
 8 not understand why I was only called at 05:20, not
 9 earlier. By daybreak, we should have set up rest
 10 centres which were staffed by BECC officers. At that
 11 point, the specialist teams — Housing and Adult Social
 12 Care — could have been deployed."
 13 Paragraph 53:
 14 "Whilst the CPU [that's your unit, contingency
 15 planning unit] had created an emergency plan, it had not
 16 been adequately tested. We should have had regular
 17 simulations to iron out problems."
 18 You mention the problem with the key to the
 19 cupboard.
 20 "This was avoidable. We could have also done simple
 21 things like started a log of events remotely. This
 22 would have meant that as soon as the computers were up
 23 and running the BECC could get to work."
 24 There are more discrete matters you mention, but in
 25 relation to those main matters, do you stand by those?

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1 A. Absolutely, yes.
 2 Q. Is there any other matter you wanted to add in relation
 3 to the adequacy of the response?
 4 A. I just think it is the fact that we didn't deal with it
 5 early enough, because — and I heard what David said,
 6 like, if you call people in too early, they get tired
 7 too quickly. But that I would agree with if it was
 8 a small-scale incident. This was huge. This — I don't
 9 think any London borough would be able to deal with this
 10 incident on their own. I've worked for a county
 11 council; I don't even think the county council would
 12 have been able to deal with it on their own. And that
 13 wasn't, I don't think, realised at the start.
 14 So I think we lost that incident within the last —
 15 within those first three hours, by not having — and
 16 I know that you asked David yesterday, could the log
 17 have been set up remotely. Absolutely it could. So he
 18 could have done that first, then travelled in to the
 19 BECC, and then you can — and then he could have called
 20 one person in, that one person could have then made all
 21 the phone calls to other BECC officers to get those in,
 22 and you could have had a BECC up and rolling a lot
 23 quicker and a lot slicker than what it was.
 24 So because we didn't have that, and we didn't have
 25 those people in the BECC and we didn't have those people

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1 on the ground, there was no real indication of what was
 2 happening, which is why, I think, when I know LFB sent
 3 in a lot of requests for electoral rolls or lists of
 4 people, there was no one in the BECC to be able to find
 5 those because he hadn't called anyone in to be able to
 6 do that role.
 7 So I think if he had called people in as soon as he
 8 got the phone call — and it blew my mind when he said
 9 that he didn't even turn on the television, because one
 10 of the first things that you're taught is you get your
 11 first information from the news. It's a 24-hour news.
 12 You get your first information from the news, and that
 13 kind of blew my mind a little bit.
 14 If that had been recognised, and if those calls had
 15 been put in, and if those people were put in place, and
 16 they would have come in — and I know in the opening
 17 statement it said that we have quite a few officers that
 18 live outside the borough. A lot of those BECC officers
 19 actually live within 30 minutes of the borough. Elaine
 20 only lives in Hammersmith. We had another officer,
 21 Asha, who actually lived in Kensington. Anne lived just
 22 over the border in Hammersmith. So there is a lot of
 23 officers that would have come in and could have come in
 24 quickly and could have set up.
 25 And the issue about the key — obviously you don't

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1 want to go into it too much — if things had been tested
 2 properly, we would have found out that the key was never
 3 there. So — and I think because that wasn't done, and
 4 I don't know why it came as such a shock to everyone
 5 within the council that we weren't coping, people should
 6 have seen that it was written on the wall that we
 7 weren't going to be able to cope, and because we didn't
 8 do any of this and then the correct procedures that were
 9 written in a manual that David wrote himself — he
 10 didn't even follow his own procedures — weren't
 11 followed, that's where we failed. And that's — and
 12 once you lose an incident, especially of this scale and
 13 especially so fast—moving, you're never going to get it
 14 back. It took literally London coming in and saying,
 15 "We're taking it away from RBKC", for it to start
 16 getting managed properly.

17 MR KEATING: Ms Blackburn, I'm very grateful. They're all
 18 the questions I have for you at this stage.

19 Mr Chairman, with your leave, if we could have
 20 perhaps a five—minute break to see if there are any
 21 further questions from core participants.

22 SIR MARTIN MOORE—BICK: Yes.

23 You probably know, Ms Blackburn, that we have
 24 a break at this point to consider further questions and
 25 possibly hear questions from people from outside the

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1 room.

2 So we'll break now. We will come back, please at
 3 4.20.

4 THE WITNESS: Okay.

5 SIR MARTIN MOORE—BICK: And we'll see at that point whether
 6 there are any more questions for you.

7 THE WITNESS: Okay, thank you.

8 SIR MARTIN MOORE—BICK: All right? Thank you very much.

9 Would you go with the usher, please.

10 (Pause)

11 I'll say 4.20, then. If you need more time, which

12 I think unlikely, you can let us know.

13 MR KEATING: Thank you.

14 SIR MARTIN MOORE—BICK: All right? Thank you very much.

15 (4.12 pm)

16 (A short break)

17 (4.20 pm)

18 SIR MARTIN MOORE—BICK: Right, Ms Blackburn. Well, we'll
 19 see if there are any more questions for you.

20 Yes, Mr Keating.

21 MR KEATING: Again, thank you so much for the time.

22 Upon consideration of all the matters, I think we
 23 have covered everything we need to cover, so there's no
 24 more questions.

25 SIR MARTIN MOORE—BICK: Right.

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1 MR KEATING: Save, Ms Blackburn, just to thank you on behalf
 2 of the Inquiry team for attending today and assisting
 3 us.

4 SIR MARTIN MOORE—BICK: And it's right that I should thank
 5 you very much on behalf of all three of us on the panel
 6 for coming here to give your evidence. It's always very
 7 helpful to get different angles on the same set of
 8 circumstances, and so we have learned a lot from hearing
 9 from you. So we are very grateful to you, and thank you
 10 very much indeed.

11 THE WITNESS: Okay.

12 SIR MARTIN MOORE—BICK: And now you're free to go.

13 THE WITNESS: Thank you.

14 SIR MARTIN MOORE—BICK: Thank you.

15 (The witness withdrew)

16 SIR MARTIN MOORE—BICK: Yes, Mr Keating. Well, that's it
 17 for the day, I think, is it?

18 MR KEATING: Yes, it is, thank you very much.

19 SIR MARTIN MOORE—BICK: Monday I believe being
 20 a Bank Holiday —

21 MR KEATING: We are not sitting.

22 SIR MARTIN MOORE—BICK: — we certainly shall not be
 23 sitting, and we shall resume hearing evidence on Tuesday
 24 of next week at 10 o'clock.

25 MR KEATING: Yes.

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1 SIR MARTIN MOORE—BICK: When there will be another witness
 2 for us to take evidence from.

3 MR KEATING: Yes, that's correct.

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

5 MR KEATING: Thank you.

6 SIR MARTIN MOORE—BICK: Thank you all very much.

7 10 o'clock, Tuesday of next week, please.

8 Thank you.

9 (4.23 pm)

10 (The hearing adjourned until 10 am
 11 on Tuesday, 3 May 2022)

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