

OPUS 2

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Grenfell Tower Inquiry

Day 43

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1 Monday, 28 September 2020
 2 (10.00 am)
 3 (Proceedings delayed)
 4 (10.05 am)
 5 SIR MARTIN MOORE-BICK: Good morning, everyone. Welcome to
 6 today's hearing. Today we're going to begin with
 7 another witness from the firm which carried out site
 8 inspections.
 9 So would you ask Mr Virdee to come in, please.
 10 MR GURPAL VIRDEE (affirmed)
 11 SIR MARTIN MOORE-BICK: Thank you very much, Mr Virdee. Sit
 12 down, make yourself comfortable.
 13 (Pause)
 14 All right?
 15 Yes, Ms Grogan.
 16 Questions from COUNSEL TO THE INQUIRY
 17 MS GROGAN: Can you please give the Inquiry your full name.
 18 A. Gurpal Singh Virdee.
 19 Q. Thank you very much for coming to give evidence today
 20 and to assist the Inquiry with its investigations.
 21 I'll be asking you the questions today, and if you
 22 have difficulty understanding anything I'm asking you,
 23 please do ask me to repeat the question or to put it in
 24 a different way.
 25 A. Sure.

1

1 Q. Please also keep your voice up so that the transcribers
 2 can hear you.
 3 You have made one witness statement for the Inquiry
 4 which is in a folder on your desk. Do you have it
 5 there?
 6 A. Yes, I do.
 7 Q. Could I please take you to the first page, which is
 8 {JRP00000333}, so that we can see it.
 9 A. Sure.
 10 Q. Then the last page, page 15 {JRP00000333/15}, that's
 11 dated 4 September 2019. Do you see that there?
 12 A. Yep.
 13 Q. Is that your signature at the bottom?
 14 A. That is.
 15 Q. Can you confirm that the contents are true?
 16 A. Yes.
 17 Q. You have also made a statement for the
 18 Metropolitan Police. If we could bring that up on the
 19 screen, that's {MET00040056}. That's dated
 20 24 August 2017. Can you confirm that statement is true?
 21 A. Yes.
 22 Q. Have you read both of your statements recently?
 23 A. I have.
 24 Q. Have you discussed your evidence with anyone before
 25 coming here today?

2

1 A. No.
 2 Q. I'm going to start by asking you some questions about
 3 your qualifications and experience.
 4 You are currently the managing partner of John Rowan
 5 and Partners.
 6 A. I am, yes.
 7 Q. And you have held this role for three years, since
 8 August 2016?
 9 A. It will be four now, yeah.
 10 Q. Four, sorry, my maths.
 11 Before that, you were the head of building
 12 surveying.
 13 A. I was.
 14 Q. What did that role entail?
 15 A. It was a case of managing a team of building surveyors,
 16 clerk of works, for the business. So I had overall
 17 responsibility for that element of the business.
 18 Q. How long did you hold that role?
 19 A. Oh, good question. 2008ish.
 20 Q. And what about before that, were you still at John Rowan
 21 and Partners?
 22 A. I was, yes.
 23 Q. And what role did you hold?
 24 A. So before then I would have been an associate partner in
 25 the same team.

3

1 Q. Have you ever worked as a clerk of works yourself?
 2 A. No.
 3 Q. If we go back to your Inquiry statement at
 4 {JRP00000333/2}, and we see paragraph 7 there, you refer
 5 to John Rowan and Partners as "a construction company
 6 dealing with construction projects in both the private
 7 and public sector".
 8 In your police statement you give a little more
 9 detail. We don't need to have it up, but you describe
 10 John Rowan and Partners as a multidisciplinary property
 11 and construction consultancy, offering project
 12 management, quantity surveying, building surveying,
 13 health and safety and planning.
 14 The services offered by John Rowan and Partners
 15 included what you describe as site monitoring and
 16 supervision services.
 17 A. It is, yes.
 18 Q. But also providing clerk of works services for building
 19 projects.
 20 A. Yes. I'm sure we're going to go into that in a bit more
 21 detail.
 22 Q. You were not Jon White's line manager; that was
 23 Luis Zarraoa, wasn't it?
 24 A. It was, yes.
 25 Q. Did Luis Zarraoa report to you?

4

1 A. He did.
 2 Q. Can you just explain your role within that department,
 3 so what it was that you did specifically ?
 4 A. Again, I would have overall responsibility for the team,
 5 and then I would line manage some of our associates, who
 6 would then -- that would cascade down to different parts
 7 of our team. So we'd have building surveyors, clerk of
 8 works, site inspectors at that time.
 9 Q. So that was a managerial role?
 10 A. It was, yes.
 11 Q. What qualified you to have that role?
 12 A. Experience. I'd been at the firm since 2004, worked my
 13 way up. I managed people along the way. I was
 14 responsible for putting bids together, and just general
 15 management.
 16 Q. Do you have any technical background or qualifications?
 17 A. Yes, I'm a chartered building surveyor.
 18 Q. Prior to 2014, what experience did John Rowan and
 19 Partners have of working on projects with rainscreen
 20 cladding systems?
 21 A. So in my 16 years of being there -- we have two teams.
 22 We have two teams, one -- sorry, we work in the
 23 public sector and the private sector, but we also work
 24 in new-build housing and refurbishment. So in both
 25 those elements -- so in the new-build housing side we

5

1 had experience in working with cladding on high-rise
 2 buildings, and I think two of them at that time were ACM
 3 or rainscreen cladding.
 4 Q. Do you know around what time that would have been, so
 5 what year?
 6 A. It would have been ... could have been any time between
 7 2008 onwards.
 8 Q. Was that within the clerk of works site supervision team
 9 or was that a different area of the business that was
 10 working on --
 11 A. So that would have been on the new-build, which would
 12 have been the employer's agent side, and we would have
 13 worked as a site inspector on some of those, and on
 14 others there would have been other site inspectors.
 15 Q. Again, prior to 2014, did John Rowan and Partners have
 16 any direct experience of working on high-rise
 17 residential re-cladding projects?
 18 A. Yes.
 19 Q. So that's the same ones that you're talking about?
 20 A. Yes, yes, yes.
 21 Q. Were you aware of the requirements of schedule 1,
 22 part B, "Fire safety", of the Building Regulations?
 23 A. I would have been aware of the Building Regulations, but
 24 not specific.
 25 Q. Were you aware of part B3, "Internal fire spread"?

6

1 A. Same answer.
 2 Q. So the same would go for part B4?
 3 A. Yeah.
 4 Q. What about the guidance in Approved Document B?
 5 A. Again, yeah, I would have had an awareness of it.
 6 Q. So aware that it existed?
 7 A. Aware that it had existed. In my training I would have
 8 been on courses on legislation, CPDs and things like
 9 that.
 10 Q. Would you have known what Approved Document B advised
 11 with regard to the external surface of a building?
 12 A. At that time, not specifically, no.
 13 Q. You have referred to your training as giving you
 14 a background in the legislation. When you were in your
 15 managerial role, so from 2008 onwards, were you
 16 attending CPD or courses on Approved Document B or the
 17 Building Regulations?
 18 A. I would have -- because I'm a chartered surveyor,
 19 I would have had to have done my CPD, so as part of that
 20 I would have been keeping up to date with changes in
 21 legislation and anything that was coming through at that
 22 time.
 23 Q. Would you have expected those that you were contracting
 24 out for clerk of works or site supervision work to be
 25 familiar with Approved Document B?

7

1 A. I would have expected them to be familiar with more than
 2 just Approved Document B, but the rest of the approved
 3 documents that were there, as a general clerk of works
 4 or site inspector.
 5 Q. And that would be familiar with what it actually says
 6 rather than just having a general knowledge that it --
 7 A. It would be an awareness. Again, it would be
 8 an awareness. And it's probably worth -- the reason
 9 why, because clerk of works and site inspectors,
 10 whichever way you want to call them in the
 11 terminology -- we'll talk a bit about that -- in my
 12 experience, 95% of the clerk of works, general building
 13 clerk of works, have come through the trades; they're
 14 ex-labourers, they're plasterers, they're electricians,
 15 so their awareness would be of general building. So
 16 that gives a bit of background.
 17 Q. I'm now going to ask you about your role on the Grenfell
 18 project. Before I go on to ask you some detailed
 19 questions about the contract with KCTMO, I just would
 20 like to clarify your role.
 21 You were the manager within John Rowan and Partners
 22 responsible for the contract with KCTMO; is that right?
 23 A. The bid came through to me, yeah.
 24 Q. Did you go to site yourself at any point?
 25 A. No.

8

1 Q. Did Jon White or Tony Batty ever discuss what they
2 observed on site or their site reports with you?
3 A. No.
4 Q. If we could go to {JRP00000010}, this is an email from
5 you to Claire Williams dated 16 July 2014. We will come
6 back to it under a separate topic, but you will see
7 there, in the third paragraph, you refer to Luis Zarraoa
8 and say he:
9 "... will manage the [clerk of works] from our side
10 internally and will also be your main point of contact
11 from a management point of view ..."
12 And then you go on.
13 Was that you effectively handing the job over to
14 Luis Zarraoa?
15 A. Yeah, at that time he would have been managing the clerk
16 of works/site inspectors, and would have had the
17 day-to-day responsibility for those members in that
18 team.
19 Q. Were you involved at all in the contract after that?
20 A. I would have had TBMs, which are task-based management
21 meetings, with Luis, one-to-one so to speak, further
22 down the line, just to have a feel and understanding of
23 what was going on on these projects.
24 Q. So at those meetings you would have asked him about what
25 was happening on the Grenfell project?

9

1 A. Yeah, just a general update and how things are
2 progressing, what's going on, are there any issues.
3 Q. Did any particular issues come up in those meetings?
4 A. No. Only what -- insofar as happened after this email,
5 that we were asked to meet with Claire in September, and
6 then the feedback I got, that they hadn't asked for us
7 to return until a later period, and that was as far as
8 we got at that point.
9 Q. So when Tony Batty and Jon White were actually on site
10 carrying out inspections, you weren't aware of any
11 issues or problems --
12 A. Again, it would have been general updates from Luis, and
13 I can't recall there being any issues or challenges, no.
14 Q. If we could go to {JRP00000295/17}, please. We'll come
15 back to this document again, but that is your bid
16 submission to the TMO in response to their invitation to
17 tender. If we just look at the second paragraph from
18 the bottom, it says:
19 "Gurpal, who heads up our Clerk of Works team, will
20 also conduct quarterly meetings with your development
21 directors, obtaining updates on current projects and
22 your future objectives, to improve efficiencies,
23 understand challenges and add value at all levels."
24 We know that John Rowan and Partners was working
25 with the TMO on other projects. Were these quarterly

10

1 meetings supposed to cover all John Rowan and Partners
2 projects or were they specific to Grenfell?
3 A. Good question. We had two teams from our business
4 working with KCTMO. So PSR, which is public sector
5 regeneration, had won the framework for
6 multidisciplinary services on the kitchen and bathrooms
7 programme, so the CRM there would have been in
8 earlier -- the client relationship manager would have
9 been in earlier with KCTMO, maybe a year before this.
10 So there were meetings, quarterly meetings I think --
11 I wouldn't have the dates or whether they were
12 quarterly, it just depends on when the client would be
13 available and you could get dates in the diary -- but
14 they would look at the overall picture.
15 I didn't personally have that, because if there was
16 a CRM already attending that meeting, then one person
17 going would cover it.
18 Q. So when it says "Gurpal ... will also conduct quarterly
19 meetings", that didn't actually happen?
20 A. I didn't, no.
21 Q. So you wouldn't have been aware if Grenfell came up at
22 any of those meetings?
23 A. We would have had -- whoever would have gone to that
24 meeting, the CRM, would have fed back notes if there
25 were -- if there was anything.

11

1 Q. And was there anything?
2 A. No.
3 Q. So we will move on now to ask you some questions about
4 the contract with KCTMO.
5 You were the individual who dealt with the tender.
6 A. Yes.
7 Q. Was it you who actually put the bid together yourself?
8 A. I would have worked with the marketing team.
9 Q. How did you find out that the TMO was seeking bidders
10 for this project?
11 A. I believe an email came through from procurement to the
12 CRM, and then it was passed on to us as the clerk of
13 works/site inspectors to prepare the bid, or look at the
14 bid first, of course.
15 Q. Did anyone at the TMO ever tell you why they were
16 seeking to engage a clerk of works?
17 A. Only what I can read in the bid that was presented.
18 Q. Can we go now to the invitation to tender which is at
19 {JRP00000011}.
20 So page 1 is titled, "Site Monitoring and
21 Supervision Services, Improvements and Enhancements to
22 Grenfell Tower". Do you see that?
23 A. Yep.
24 Q. Moving on then to page 4 {JRP00000011/4}, it states
25 under the heading "Requirements" that the TMO:

12

1 "... requires an organisation to provide two clerks
2 of works to assist in the supervision and monitoring of
3 the works. One clerk of works should have experience in
4 mechanical and electrical installations and the other
5 with building works (ideally with experience of the
6 installation of external cladding)."

7 Did you note at the time that the TMO was looking
8 for a building clerk of works with experience of the
9 installation of cladding?

10 A. I think with this document you have to look at it in its
11 entirety, so -- and I'm hoping we can go back and look
12 at the first page of this. But yes, as I read that,
13 ideally with -- a general building clerk of works, yes,
14 so the skillset of a clerk of works is required to carry
15 out supervision and monitoring of the works is the first
16 thing that would register in my mind. Then reading that
17 on, in brackets, "ideally with experience of the
18 installation of external cladding". Now, cladding comes
19 in many different forms: tile, glass, you name it. So
20 in terms of experience, we had that within our
21 resources.

22 So reading that, at that point of looking at this
23 document, fine, I understand that. You then see
24 experience -- another clerk of works should have
25 experience in mechanical and electrical installations.

13

1 Okay, that's fine. But I think you need to look at the
2 page before this to get the full context of how I would
3 have looked at the document.
4 Q. Well, we can do that now, if we go back a page to page 3
5 {JRP0000011/3}. There it sets out, under "Background
6 to this procurement requirement", some background to the
7 Grenfell Tower refurbishment.

8 A. Yeah, so --

9 Q. Second paragraph, it says:

10 "A project has been approved to undertake the
11 following works; new external cladding and double glazed
12 windows to all flats ..."

13 A. Yeah, so in terms of reading this, I mean, I would have
14 read this document three or four times before I'd start
15 considering it fully, just to make sure I fully
16 understand it. Now, you read that, "new external
17 cladding and double glazed windows to all flats",
18 I understand that, that's part of the project. Then
19 there's more detail on -- you've got a communal heating
20 system going in; you've got the installation of
21 individual HIUs; surface run central heating within each
22 flat, there was 120 flats; hot and cold water services;
23 seven new flats; re-provision of a nursery and
24 a boxing club. And something that resonates with me at
25 this time of reading that document: "All flats will

14

1 remain occupied during the construction works". That's
2 massive. It's a live site.

3 So when I read that, I look at that thinking: okay,
4 there is external cladding going on, I understand, yes,
5 but when you read, "All flats will remain occupied
6 during the construction of works", that's -- from our
7 experience and our site inspectors and clerk of works
8 who have worked in that area, when you are dealing with
9 that amount of work and the amount of disruption it
10 causes for residents, that's -- you need some experience
11 of understanding how you'd work on that building. So
12 they're the things that I would have considered.

13 Then you look at the second paragraph, and it's
14 a design and build contract, and then it goes on to say:

15 "The Contract Administrator and CDM Co-ordinator is
16 Artelia ... Max Fordham has been appointed as technical
17 adviser to provide KCTMO with technical support relating
18 the [M&E] ..."

19 Now, to me, reading that document, there is a lot of
20 stuff going on internally, and the TMO have appointed
21 someone specialist to look at the mechanical element.
22 So to me, that's an extra layer that's been put in which
23 they -- at the time of reading this, this is
24 an important part for them. That causes them concern.

25 So then when I look at the next page, and then you

15

1 read that in the context of a clerk of works to provide
2 site inspection, and the building clerk of works, so
3 general building clerk of works, ideally to have
4 experience, it doesn't -- if it said there, "I need
5 an expert façade engineer to check the external
6 cladding", that would have raised a red flag in my mind.
7 It would have raised a red flag in my mind because
8 I would have asked the question internally: do we have
9 that resource? If we haven't got it, I'd have to bring
10 that in, like what we had to do with the mechanical and
11 electrical, we had to bring that resource in to deliver
12 that aspect.

13 Q. So Max Fordham you knew would have been more on the M&E
14 side as a specialist adviser.

15 A. Yeah.

16 Q. And if I understand what you're saying, that means that
17 you thought you needed to get a specialist M&E clerk of
18 works?

19 A. No, no, I didn't say we needed to get a specialist clerk
20 of works. What it says there is "ideally have
21 experience in external cladding", which we did. At that
22 point we didn't know what type of cladding it was.

23 Q. Just going through your answer in stages, you did
24 subcontract out the M&E work to Tony Batty.

25 A. Yes.

16

1 Q. And was that because, from this document, you formed the
 2 impression that the M&E works were going to be
 3 complicated and also important to the TMO?
 4 A. That was a request, they asked for a mechanical and
 5 electrical clerk of works. We do not have that
 6 in-house; therefore, we subcontracted that out.
 7 Q. Focusing on the cladding, did anything in this bid give
 8 you any indication that it was rainscreen cladding that
 9 was going to be installed?
 10 A. No.
 11 Q. Did you form an impression from this bid that the
 12 general clerk of works was to have a more limited role
 13 than the M&E clerk of works?
 14 A. Could you just repeat that again, please? Sorry.
 15 Q. So at the time, from reading this document, did you form
 16 any impressions about whether the general building clerk
 17 of works was to have a more limited role than the M&E
 18 clerk of works?
 19 A. I'd say they were both limited.
 20 Q. Why do you say that?
 21 A. You have got to fundamentally look at what the role was,
 22 so site inspection and monitoring services. And you
 23 look at the contract. It's a design and build contract
 24 where the client has transferred the responsibility
 25 for -- ultimately, they've transferred the

17

1 responsibility for a product to be designed, fully
 2 compliant and to the best quality they can build it.
 3 Now, when I see that, I know contractually that a clerk
 4 of works isn't necessary for this job because there
 5 isn't that requirement. So I know instantly my role is
 6 limited.
 7 If I was a full-time clerk of works on a traditional
 8 contract, the risk is more with the client and the
 9 architect in terms of compliance and the extent by --
 10 the architect, by extension, employs a clerk of works to
 11 be his eyes and ears, and traditionally he would be
 12 full-time on site, so he had maximum exposure to a site.
 13 He'll understand what's going on in meetings,
 14 subcontractor meetings, if anyone is turning up to the
 15 site, any issues which perhaps someone would want to
 16 keep to themselves, your ear would be to the wall, so
 17 you'll know. For me, that's already a major shift, and
 18 then when you get to looking at the site inspection
 19 role, that break's already there, if that makes sense.
 20 So I'm only ... and it's subject to what the client
 21 wants you to do under this contract, because this is
 22 a client-led appointment, and it's limited to
 23 a site-based inspection. I'm only involved in that
 24 element. So once they're on site, I am inspecting site.
 25 Q. So where there is a design and build contract, and where

18

1 you have formed the view that a full-time clerk of works
 2 isn't necessary or isn't what's being asked for, why
 3 wouldn't the client want a more limited role to be their
 4 eyes and ears on site, even if it's just a day a week?
 5 A. Could you say that again, sorry? I missed the first
 6 part.
 7 Q. So where you have a design and build contract, which is
 8 what we have here, and where you know you're not going
 9 to be on site every day, why wouldn't the client want
 10 the clerk of works on those days to be their eyes and
 11 ears?
 12 A. On the days that they're not there?
 13 Q. No, the days that they are?
 14 A. Why would they want them to be?
 15 Q. Why wouldn't they?
 16 A. Why wouldn't they? Sorry, you've confused me there.
 17 Q. Sorry, my understanding of your answer was that a clerk
 18 of works that's on site every day is the client's eyes
 19 and ears.
 20 A. Yeah.
 21 Q. Is that different for a clerk of works who is only
 22 on site one day a week?
 23 A. Yeah, I understand what you mean now. Yes, they would
 24 still be their eyes and ears, but the difference is in
 25 the amount of information they'll be able to glean on

19

1 that one day compared to being there five days a week.
 2 Q. If we could go now to page 4 {JRP00000011/4} of this
 3 document, back to the section headed "Requirements", and
 4 at the second half of the page, if we zoom in on that,
 5 it says there:
 6 "The duties of the Clerk of Works shall comprise,
 7 but not be limited to ..."
 8 And I'll just pick out a few. Second bullet point
 9 down:
 10 "Have access to the drawings and specification, and
 11 be familiar with the same; using them as a reference
 12 when inspecting the work."
 13 Then a few more bullet points down:
 14 "Taking measurements and samples on site to make
 15 sure that the work and the materials meet the
 16 specifications and quality standards."
 17 And then third bullet from the bottom:
 18 "Being familiar with legal requirements and checking
 19 that the work complies with them."
 20 Would you say that description accords with the
 21 tasks a clerk of works normally undertakes?
 22 A. Yeah, this is a standard, generic lift from the
 23 Institute of Clerk of Works, they term it "clerk of
 24 works/site inspector". So, yes, this is a generic ...
 25 Q. But that is what the TMO was asking your company to do

20

1 on site ; do you agree?

2 A. I agree that was part of it . There was further

3 instructions that were provided later on, specific

4 instructions .

5 Q. We will come to those a little bit later .

6 In relation to, "Have access to the drawings and

7 specification , and be familiar with the same", what did

8 you understand that to mean at the time?

9 A. So under site inspection, I would expect that we'd have

10 a general understanding of what's being built , ie if

11 you're a site inspector and you're working on site and

12 you're joining a project when it's on site , you've got

13 to get yourself familiar with what the work is so you

14 can plan, manage and work your way around a site.

15 Now, you can be a site inspector on a £175 million

16 project or a £10 million project . Now, I wouldn't

17 expect on either that you would review thousands of

18 drawings because you're asked to visit on site .

19 And if you could scroll , sorry, up, and there's

20 a little clue, you know:

21 "Mobilisation period.

22 "Intermittent involvement until works start on site

23 proper."

24 They've even indicated two to three days there to --

25 for pre-start meetings and familiarising yourselves with

21

1 specs and planning requirements. Now, that gives you

2 a gauge of how they anticipate it and how we would see

3 it . Now, therefore, you'd have a general understanding

4 of the building works that are taking place, and then

5 when you're on site , you'll have a better understanding

6 of how that all starts to work.

7 Q. But you would expect a clerk of works under this

8 contract to at least be familiar with what had been

9 specified on site?

10 A. Yes. I would expect them to have read the document and

11 then looked at it and familiarised themselves on site

12 when they're there, if necessary.

13 Q. And that would include the specification for the

14 cladding?

15 A. It would be just getting a general flavour for the whole

16 project . That's one element of it, yes.

17 Q. Yes, so looking at the specification and seeing what

18 materials were being used as part of the external

19 façade?

20 A. (Witness nods).

21 Q. Sorry, you need to say yes --

22 A. Oh, sorry, yes.

23 Q. -- if it is yes --

24 A. Yes.

25 Q. -- so the transcribers can hear you.

22

1 In practice , if one of your team spotted on site

2 that works did not match the specification , would you

3 expect them to raise this?

4 A. So if they were walking around on site, and they spotted

5 that something wasn't in accordance with the drawings,

6 then you would expect them to pick it up if they saw it .

7 Q. So if they had familiarised themselves with the

8 specification , and they saw a material that wasn't in

9 the specification being installed on site , that's

10 something they should be raising?

11 A. If they saw it, yes.

12 Q. Surely that's the sort of thing they should be checking

13 for, though?

14 A. Well, in terms of his walk-around on site, they would be

15 looking around, and if they saw something that wasn't

16 right, they would raise it and put it in their report.

17 Q. So that's the extent, then, of what you'd expect someone

18 to do under this contract, is walk around and if there

19 was an obvious problem that they saw, they could raise

20 it , but they wouldn't go and ask who was working

21 on site , "What are you installing ?"

22 A. I think the key here is it's a design and build

23 programme, so it's fluid , yeah? So in a traditional

24 sense, a contract -- if it was a traditional project,

25 the tender drawings would probably have been full plans,

23

1 approved building regs drawings, for example. So from

2 the outset of a project, you'll know what's being built ,

3 so it's slightly easier . On a design and build, it's

4 more fluid, so things can change.

5 So it's very important in this one day you're

6 on site that you have that general walk-around and you

7 ask the questions where you can and you check where

8 the -- because they're working close -- the contractor

9 is working closely with Building Control, and that's

10 important here, and we would ask the questions, from

11 what they have seen and what's being build, is that in

12 accordance and is it approved?

13 So if Building Control had been there and said there

14 was an issue with what they are seeing, then I would

15 expect Jon or whichever site inspector to pick up that

16 issue and raise it .

17 Q. We will come on to the topic of Building Control in

18 a moment.

19 The clerk of works were intended to be on site

20 one day a week each during the construction period.

21 That's what it says in this document. That's a regular

22 attendance on site , isn't it , one day a week?

23 A. It depends what's regular. I mean, some clients might

24 turn round and say, well, once a month might be regular

25 for them.

24

1 Q. But it's not the case that the clerk of works was
 2 coming, walking around, seeing what was happening and
 3 then not coming back for weeks on end; they would
 4 have --
 5 A. Oh --
 6 Q. -- been regularly up to date on what was happening.
 7 A. We were asked to visit site once a week.
 8 Q. So they should know, then, what changes were happening
 9 on site on a weekly basis, shouldn't they?
 10 A. Well, it depends what they're doing on that day. This
 11 is where I think you've got to look at the specific
 12 requirements, what the client had asked us to do, and we
 13 can do that at some point.
 14 So their job would be to walk around and understand
 15 what's going on on that job, and that's limited to
 16 talking to Rydons, who are the principal contractor in
 17 charge of understanding what they do on site. So
 18 I would expect us to walk around, get a general feel for
 19 what the client has asked us to do and prepare in our
 20 report.
 21 Q. During the construction period, if the design changed,
 22 that's something that the clerk of works would have been
 23 informed about?
 24 A. Well, you've got to remember, on this, the client didn't
 25 instruct us to attend any design team meetings, and for

25

1 the first six months from when we did start, we still
 2 weren't involved in any site progress meetings. So in
 3 terms of picking up that knowledge, Jon would have had
 4 to pick that up from his site inspections.
 5 Q. How is it you can expect a clerk of works to do their
 6 job if, as you're saying, they may not be aware of
 7 design changes or what's happening on site?
 8 A. Well, you would hope from that inspection that he picks
 9 up that information by asking the question.
 10 Q. Moving on, if we could go back to the bottom half of
 11 that page again and just ask you about the requirement
 12 to be familiar with the legal requirements and checking
 13 that the work complies with them.
 14 Did you note that requirement at the time you were
 15 preparing the tender?
 16 A. Sure, yes.
 17 Q. I think you have said in the industry that's a standard
 18 term for a clerk of works appointment.
 19 A. Yes.
 20 Q. What did you understand the legal requirements to be?
 21 A. I think you need to be more specific in -- compliance
 22 can be many things, so in your terms.
 23 Q. Well, it's written there "be familiar with the legal
 24 requirements". Knowing what you knew of this job from
 25 the tender, what were those legal requirements?

26

1 A. So legal requirements in my mind ... there's too many
 2 different parts to this. So let me try and break it
 3 down into what I think ... in terms of building
 4 compliance, I would in this instance say that we would
 5 be checking that the works were compliant by asking the
 6 question of Building Control and the principal
 7 contractor, and I back that by saying something that
 8 I said earlier, that the general building clerk of
 9 works, you have to understand where their background is.
 10 They could be a labourer, they could be a plasterer,
 11 they could be an electrician. So if they're looking at
 12 that element, they can only do it within their sphere of
 13 expertise. So if they're being asked to check whether
 14 something is compliant as the design, I would expect
 15 them to ask the expert who is responsible for that
 16 element. Because they wouldn't be an expert in every
 17 single facet of every approved document and the general
 18 building.
 19 Q. So on this job you knew that cladding formed part of it.
 20 A. Sure.
 21 Q. You selected Jon White for the role. You knew he had
 22 some experience of cladding, and we heard on Thursday
 23 that he had done one rainscreen cladding project before.
 24 So on the basis of your answer, would you have expected
 25 him to know of the Building Regulations requirements for

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1 cladding systems?
 2 A. I would have expected him to have an awareness of the
 3 Building Regulations and asked the question to those who
 4 were responsible for compliance.
 5 Q. If we could go to paragraph 34 of your statement to
 6 the Inquiry, which is {JRP00000333/8}. Paragraph 34 at
 7 the bottom, you say:
 8 "It is my understanding that all considerations
 9 relevant to the building regulations should have been
 10 dealt with by the principal contractor, and those
 11 professional bodies dealing with design planning and
 12 specifications."
 13 Then on to the next page, paragraph 36
 14 {JRP00000333/9}, you were asked the question:
 15 "Did anyone at JRP form a view as to whether the
 16 design of the refurbishment of the Tower complied with
 17 the relevant Building Regulations ..."
 18 You answer that there:
 19 "No, because it was not part of JRP's remit ..."
 20 Having looked at the clause in the invitation to
 21 tender with me, do you agree now that it was intended
 22 that John Rowan and Partners' role was to check for
 23 compliance with the Building Regulations?
 24 A. No.
 25 Q. But that's what it says in the tender.

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1 A. It asks us to check that those responsible for it --
 2 Q. If we could go back --
 3 A. So you've got to go back -- if you go back to the
 4 previous paragraph, the one that you --
 5 Q. We'll go back to the invitation to tender there so you
 6 can see the words again, which is {JRP00000011/4}. It
 7 says there very clearly in the third bullet point from
 8 the bottom that the clerk of works' duties shall be:
 9 "Being familiar with legal requirements and checking
 10 that the work complies with them."
 11 It doesn't say, "Check that those responsible are
 12 checking", does it?
 13 A. It doesn't either. So let's go back to what the design
 14 and build contract was. The responsibility under
 15 a design and build contract is for the principal
 16 contractor to provide the client with a product which is
 17 fully compliant, designed to a top quality. Now, they
 18 have been paid a fee to design and ensure the compliance
 19 of that. We haven't -- what I'm trying to say there is
 20 we haven't been part of that process. We're coming in
 21 on site, and those discussions and those issues are
 22 being addressed by others, of which we're not involved.
 23 So the best we can do is by asking the question, "Have
 24 you guys checked that it's compliant and have
 25 Building Control approved it?"

29

1 Q. But your client here is asking you to check. Why are
 2 the terms of the design and build contract relevant at
 3 all?
 4 A. No, what I'm trying to show you there is the distinction
 5 of where that lies. Now, if you're asking me to --
 6 actually, what would be good is if you can -- what do
 7 you think it means, is probably going to help me answer
 8 the question better. What in your mind -- I'm a bit
 9 unclear as to what you're asking me to answer.
 10 Q. I'm interested in your evidence and your answers to
 11 these questions, so I'm asking you the questions, and
 12 all I'm asking you is, given that it just says,
 13 "checking that the work complies with them", why it is
 14 that you formed the view that that was limited to
 15 checking that Building Control were checking?
 16 A. Okay, are you asking that we should have -- or are you
 17 implying that we should have checked each design and
 18 validated it for compliance?
 19 Q. I'm trying to understand what your understanding of the
 20 role was.
 21 SIR MARTIN MOORE-BICK: Let me see if I can help.
 22 What I think is being put to you for your comment,
 23 agreement or disagreement, is that this line in the
 24 duties requires your building inspector to be aware of
 25 all the legal requirements applicable to the work and to

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1 ensure that they are all complied with.
 2 Is that a fair way of putting it?
 3 MS GROGAN: Yes.
 4 SIR MARTIN MOORE-BICK: Now, what do you say about that?
 5 A. I don't think it's to ensure, I think it's to check, and
 6 by checking is asking the question of those who were
 7 responsible for compliance to confirm that it complies
 8 or not. And the reason is because if you're asking us
 9 to confirm that it all complies, I would probably need
 10 15 different experts for every single approved document
 11 to confirm that it complies, which is not what the
 12 client is intending. They've already procured a design
 13 and build contract for the principal contractor to take
 14 that responsibility.
 15 SIR MARTIN MOORE-BICK: All right. Thank you.
 16 MS GROGAN: What value was John Rowan and Partners adding to
 17 the client if all it was doing was checking that
 18 Building Control was checking?
 19 A. I think ... we were asked by the client, and there's
 20 a specific email of what they requested us to do, and it
 21 was to inspect site and report on, I think, five or six
 22 different aspects of the project and identify any issues
 23 that we would find, and the reports, to be fair, do pick
 24 up issues and areas that needed to be addressed. So
 25 there is value in that.

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1 Part of that also was, and one of the requirements
 2 from the TMO, to engage with the residents in terms of
 3 dealing with their issues, and there were issues, and
 4 it's a disruptive -- it's a disruptive programme of
 5 works, and the client had asked for Jon to either attend
 6 meetings with residents who may have had issues with
 7 works and what's going on, so they were there to help
 8 the process. So I think the value is there. The value
 9 is there.
 10 Q. But details of the Building Control visits to site were
 11 included in the Rydon progress reports, so if it was
 12 just a matter of the clerk of works looking at those
 13 reports and reporting that back to the client, what
 14 additional value is there?
 15 A. Well, it wasn't just picking it up from the minutes, it
 16 was also asking the question of Rydons when they were
 17 there and getting just a general feel. So that's --
 18 again, that's one aspect of it. You know, there were
 19 five other elements that were being reported on. But if
 20 you're going to hone in on Building Control, that is one
 21 aspect, but there was five other elements which were
 22 just as important.
 23 Q. Should the clerk of works not check for himself
 24 precisely what Building Control was checking by talking
 25 to them directly?

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1 A. Well, we didn't have a contractual relationship with
 2 them, number one, and then the practicality of it is
 3 you're attending site once a week, if they're there
 4 on site, you may see them, you may not, and generally
 5 what tends to happen is the contractual relationship is
 6 between the principal contractor and Building Control,
 7 and they're dealing -- we're almost like a fly on the
 8 wall, so we'll pick up that information from logs. So
 9 it really does depend on when you visit site. Because
 10 there isn't an obligation for our site inspector -- for
 11 Building Control to engage with us because we have no
 12 link with them.
 13 Q. So it's just a matter of chance, then, as to whether --
 14 A. If you meet them, it could be a matter of chance, yes,
 15 so that's why you look at the log.
 16 Q. In practice, if one of your team spotted on site that
 17 works did not comply with the Building Regulations you
 18 would expect them to raise this, wouldn't you?
 19 A. As per the design, yeah.
 20 Q. What about obvious breaches, for example an absence of
 21 cavity barriers around the windows?
 22 A. If it was an issue of -- if that's what it said in the
 23 design and it wasn't fitted, then yes.
 24 Q. Not compliance with the design, but non-compliance with
 25 Approved Document B. So Approved Document B is clear

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1 that you require cavity barriers around the windows.
 2 Isn't that something a clerk of works should have
 3 noticed and raised?
 4 A. Well, the design had already been prepared, and
 5 a significant amount -- I remember from looking at one
 6 of the reports that Building Control had approved the
 7 top three floors for compliance, so therefore Jon would
 8 have picked that up, and that's what the model was that
 9 followed all the way down.
 10 Q. But if the clerk of works knew that the guidance under
 11 ADB said cavity barriers around the windows, and he saw
 12 on site there weren't any there, would you expect him to
 13 at least query this with the designer as to why they
 14 weren't there?
 15 A. Well, it would depend.
 16 Q. On what?
 17 A. Number one, the design had already been approved, yeah?
 18 There are instances where you may spot something, but
 19 ultimately it's a responsibility -- we could say, "We
 20 don't like the colour of that wall" or "That doesn't
 21 look quite right". It's for the principal -- that can
 22 be raised, and it's for the principal contractor to
 23 address or not or ignore what we say, because if the
 24 design complies, that's the overriding position.
 25 Q. Can't it --

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1 A. So in this instance, the design complied.
 2 Q. Did it ever occur to you that both Building Control and
 3 the clerk of works could be responsible for checking
 4 compliance with the Building Regulations?
 5 A. In which way?
 6 Q. Well, did it ever occur to you that it could be both
 7 Building Control and the clerk of works? So just
 8 because Building Control are doing it doesn't mean there
 9 is no separate obligation under the contract with the
 10 TMO on the clerk of works to do it.
 11 A. See, I think there's two different things at play there.
 12 I think one is you'd be looking for workmanship, quality
 13 of workmanship, as a site inspector, and if you had
 14 spotted something which didn't -- wasn't in accordance
 15 with the designs and it was obvious, you would pick it
 16 up and you would put it in your report.
 17 Q. Did you have any contact with KCTMO about this project
 18 after you handed over to Luis Zarraoa?
 19 A. Did I have any contact with KCTMO?
 20 Q. Yes. So we looked at the email where you handed over --
 21 A. In relation to this project?
 22 Q. Yes, in relation to this project.
 23 A. No, I don't think I did.
 24 Q. So were you aware of whether the KCTMO ever said to
 25 those who did have contact -- so Luis Zarraoa,

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1 Jon White, Tony Batty -- that JRP's role was in fact not
 2 to check for compliance with legal requirements?
 3 A. They would check compliance by checking that
 4 Building Control are happy with what they did.
 5 Q. But were you aware of any conversation with the TMO
 6 where that was made clear?
 7 A. I'm aware that there was a meeting with the client where
 8 she set out her specific requirements.
 9 Q. Were you aware of any difference between what you
 10 thought JRP's role was and what the TMO thought JRP's
 11 role was?
 12 A. Say that again, sorry?
 13 Q. Were you aware of any difference between what the TMO
 14 thought you might be doing and what you had interpreted
 15 the clerk of works' role to be?
 16 A. No, and the reason being is that at that time, when
 17 I was contacted by Claire Williams, she had said she
 18 would be looking at the terms of our appointment and
 19 we'll meet later on. So in my mind I do remember that
 20 vividly, that I said to all three, actually, Luis, Jon
 21 and Tony, "Make sure you understand exactly what the
 22 brief is from the client, exactly and precisely what
 23 they want us to do".
 24 Q. Could we go to {TMO00840364}.
 25 (Pause)

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1 So that is one of Claire Williams' statements to
2 the Inquiry. If we could go to page 7 {TMO00840364/7}
3 at paragraph 34, please, this is how Claire Williams
4 describes JRP's role, which is:

5 "TMO also engaged John Rowan and Partners as Clerk
6 of Works to inspect the various works on site. This
7 included inspection of workmanship and quality to ensure
8 works were carried out as designed and to challenge
9 Rydon when necessary if there were shortcomings. They
10 also had a role to report on health and safety issues.
11 This was an additional tier of inspection to ensure
12 works were completed to a good standard to ensure the
13 landlord's future maintenance risk was limited."

14 Do you agree with that description of your role?

15 A. Yes, and I'll explain why I think parts of it do. The
16 inspection of workmanship and quality, if you're
17 inspecting on a weekly basis, part of the report was to
18 have a look at the quality of workmanship and, if you
19 spot any issues, raise that in your report. As far as
20 I'm aware, the works were completed as designed.

21 In terms of health and safety issues, it would have
22 been general site safety issues which would have been
23 picked up in the report.

24 And then we were asked to check the finishes of --
25 snag the finished finish, so to speak, if that makes

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1 sense.

2 Q. You say, as far as you know, the works were carried out
3 as designed; how do you know that?

4 A. Again, by asking the question and checking whether
5 Building Control had any issues.

6 Q. Moving on, you say at paragraph 11 of your statement
7 {JRP00000333/2} that John Rowan and Partners'
8 appointment was for site monitoring and supervision
9 services. We don't need to pull that up. At
10 paragraph 17 of your statement {JRP00000333/3} you say
11 that the services were not clerk of works in a typical
12 sense.

13 Jon White has used similar terminology in his
14 statement and evidence to the Inquiry. Is this
15 something you have discussed with him before coming here
16 today?

17 A. I have been discussing this with clients and our team
18 for 16 years. Site inspection ... I mean, I see
19 confusion for those who are not involved in doing this
20 type of work, clerk of works in its traditional sense,
21 and I think Jon's already spoken about how that works.
22 But clerk -- when you read clerk of work as it is there,
23 it feels like it's a fuller role than what it is if
24 you're a site inspector.

25 SIR MARTIN MOORE-BICK: Mr Virdee, I think it would help me,

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1 and perhaps others, if you were just to give us a brief
2 description of what you understand to be the role of
3 a clerk of works in a full sense and compare it with
4 what you understand to be the role of a site inspector.

5 A. Yeah, yeah.

6 In the traditional sense, it's worth understanding
7 that the client -- if it was a traditional contract, the
8 client is ultimately responsible for the compliance --
9 all the risk pretty much sits with them, and then they
10 appoint an architect, who is the lead designer, and
11 obviously that contractual obligation passes on to them
12 to make sure the design is compliant, and you would
13 probably engage a clerk of works at that point --
14 I might add, again, it would be someone who was
15 a general clerk of works, so it could've been
16 a labourer, a plasterer, I keep saying that -- and they
17 would get an understanding of what the job is from the
18 start, so they've got a good feel for it.

19 Now, the tender package and what would go out to
20 a contractor to price would probably be on the basis of
21 an approved set of drawings which have been through
22 Building Control, so you have got no ambiguity in what
23 the design is. So very, very clear what it is. That
24 would go out to tender. Then obviously once it's
25 on site, you wouldn't expect the lead architect to be

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1 on site full-time, because that would be a fairly
2 expensive way of running a project, and the clerk of
3 works would be the person on site full-time, have his
4 own site office, have those drawings to hand, and work
5 the site.

6 Ultimately, the clerk of works will have probably
7 a far greater understanding of that project than anyone
8 else. He would be on site and he would have access to
9 all the contractor meetings. So if there is issues
10 being raised between contractor and subcontractor, or
11 challenges with how they're to do the work, he would
12 have a good understanding of it and he could feed that
13 back up the chain. If Building Control were
14 inspecting -- they may not be, because it's an approved
15 set of drawings, therefore Building Control may not have
16 ever attended site.

17 So, for me, the clerk of works has huge exposure to
18 the site and what's going on at any given time
19 throughout that project.

20 SIR MARTIN MOORE-BICK: It sounds to me as though you're
21 describing a person who is acting as the representative
22 of the architect, who is himself responsible for the
23 design and oversight of the construction work by
24 a contractor who is simply there to build?

25 A. Build, yes.

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1 SIR MARTIN MOORE-BICK: All right, thank you.
 2 A. Yes.
 3 SIR MARTIN MOORE-BICK: Now, what about a site inspector?
 4 A. So a site inspector, as we've said, is -- I've only --
 5 my experience in dealing with site inspection is only
 6 with design and build contracts, so I've never dealt
 7 with it -- I know others within the business have worked
 8 and we've got clerk of works who have worked as the
 9 traditional clerk of works, so they're best placed.
 10 We're not -- as we said earlier, the design and
 11 build contract, the client has passed all that
 12 responsibility over to the principal contractor for
 13 a set price, "I want X, Y, Z and you design it, you get
 14 the experts in who need to design it, and you obtain
 15 that approval and you build it, and you give me that
 16 top-quality product at the end, fully compliant and
 17 set".
 18 Now, the site inspector hasn't been involved --
 19 I mean, you can use this project as a great example. It
 20 started in 2012, we didn't get on to site until 2015, so
 21 there's a hell of a lot of work that's been done before
 22 then, and we're not involved in -- we don't have that
 23 information, we do not understand what's been going on.
 24 We have been asked to enter the project at a specific
 25 time to have a look at what's going on on site, and you

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1 don't have that exposure because you're there -- the
 2 client could have said, "Come in once a month". You
 3 would only pick up what you would see on that one day,
 4 and there's probably a lot of things you need to pick up
 5 in that one day.
 6 Does that help?
 7 SIR MARTIN MOORE-BICK: Yes, that's very helpful.
 8 Ms Grogan, sorry I interrupted your questioning, but
 9 I thought it would be helpful, certainly for me and
 10 perhaps others, just to understand these labels that are
 11 being attached by people to different roles.
 12 MS GROGAN: Yes, Mr Chairman, that was in fact going to be
 13 my next question, but I'll skip over it now.
 14 SIR MARTIN MOORE-BICK: I apologise in that case.
 15 MS GROGAN: Can you account for why it is that the duties
 16 set out in the invitation to tender for this project are
 17 more extensive than the site supervisor role that you've
 18 in fact described just now.
 19 A. Say that again, sorry?
 20 Q. Can you explain why it is -- so we looked at the
 21 invitation to tender and the list of duties of a clerk
 22 of works, and your evidence was that is a pretty
 23 standard description of a clerk of works --
 24 A. Or site inspector, yeah.
 25 Q. -- or a site inspector. You have described a more

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1 limited role to the Chairman and Ms Istephan just now.
 2 Can you explain why it is that what John Rowan and
 3 Partners actually did on site seems to be more limited
 4 than those duties set out in the ITT?
 5 A. You can only pick up based on the requirement of what
 6 your role is, if that makes sense. If you want to -- do
 7 you want to pull up the scope again?
 8 Q. So that's {JRP00000011/4}. We have been looking at the
 9 second half of the page there --
 10 A. Yeah.
 11 Q. -- under the sentence, "The duties of the clerk of works
 12 shall comprise, but not be limited to ..."
 13 A. So can you repeat the question again now, please?
 14 Q. Can you explain why the role of site inspector that you
 15 have described, and what we know Jon White was actually
 16 doing on site, seems to be less extensive than this list
 17 of duties here?
 18 A. I think it's the same, in terms of it's a limited role,
 19 so you applied the ... you know, look at the first one,
 20 it says "by daily signing in and out of site". He is
 21 not there daily, for a start. So you have got to apply
 22 the limit. This is a generic document. "Have access to
 23 the drawings and specification". We've got access to
 24 the drawings and specification and we use them to walk
 25 around. You may not carry 300 drawings with you as you

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1 walk around site. So if you have a general
 2 understanding of what the works are, and then if you
 3 spot an issue, you raise it.
 4 So when you start looking at that, and you
 5 understand what the site inspector is there to do, then
 6 it makes sense.
 7 Q. If we could go now to {MET00023699}.
 8 Just before we look at this document, as it's
 9 loading, can I ask you: did you ever make it clear to
 10 the TMO what limitations you thought applied to this
 11 role?
 12 A. No, I think they know what the limitations are, because
 13 of how they've set their brief. For example, you look
 14 at that first part of the table where it says two to
 15 three days to assess the drawings and specs for
 16 an £8.5 million job, you know, two to three days, and
 17 that includes pre-start meetings. So if Jon, Tony and
 18 Luis had been to a pre-start meeting in September,
 19 that's one and a half days taken out of that, which
 20 leaves another day and a half.
 21 So I think it's a question for the TMO, ultimately,
 22 as to what they thought. But when you look at that
 23 document and what they, you know, put down there,
 24 a familiarisation of the drawings is the general one for
 25 a site inspector to hit the ground running.

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1 Q. This is Tony Batty's witness statement given to the
2 police. You see at the very bottom of the page he
3 starts explaining what his role is. So he says:
4 "My role is Clerk of Works and what that means is
5 that when a job comes up I'll check the drawings and
6 make sure that bit as been installed as per the drawings
7 even if we have designed the mechanical and electrical
8 installation ourselves. If there is a fault with the
9 drawings I will identify it highlighting what the fault
10 is. I will check the whole thing for quality all the
11 way through right down to when they do the commissioning
12 and make sure that its working right. I do that on
13 loads of different projects such as health, residential
14 and schools ... Having conducted the inspections on
15 mechanical and electrical design and installation
16 I would report my findings back to the client."
17 Can you account for why Tony Batty seems to have
18 thought his role involved checking the installation
19 against the drawings and for faults with the drawings?
20 A. Well, let's go back to the brief. They've asked for
21 a mechanical and electrical clerk of works, and if you
22 look at the brief, they also appointed Max Fordham as
23 a technical adviser. So that -- and we've got a general
24 building clerk of works. So that's a specific skillset,
25 where they -- he's looking at things in that manner.

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1 I think the package there was quite -- it was not as
2 onerous as the overall building package.
3 Now, can you start again with your question?
4 I think I've just answered a bit of it, and I've lost
5 train of thought on the second part.
6 Q. Well, I was just asking you why it appears that
7 Tony Batty thought his role was different to the role
8 you have described Jon White as undertaking. I think
9 you have answered that.
10 A. Okay.
11 Q. Did you ever have a discussion with Tony Batty about
12 what he was required to do on the project, or did you
13 leave that up to him to work it out?
14 A. No, they all went to the same meeting. I wanted them
15 all there to understand exactly what the brief is from
16 the client.
17 Q. If we go now to your bid to the TMO, which is
18 {JRP00000295/3}, you refer to both Jon White and
19 Anthony Batty there at the bottom as clerk of works. If
20 they weren't performing the clerk of works role, why did
21 you describe them in that way in the tender?
22 A. Because the document asks for a clerk of works skillset
23 to deliver site inspection and monitoring services.
24 Q. On page 12 {JRP00000295/12} of this document, you give
25 case studies of projects in response to question 3 of

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1 the invitation to tender. Question 3 is there at the
2 top and says:
3 "Please provide details of three (3) contracts or
4 projects which you consider demonstrate comparable
5 requirements to those of this contract."
6 Example 1, under the heading, "Details of Clerk of
7 Works Services Provided", you say:
8 "We provided dedicated, site based experienced Clerk
9 of Works, who established benchmarking 'live' quality
10 samples and robust inspection/snagging regime ...
11 reported on progress ... [and] supported HfH on resident
12 liaison ..."
13 That was a site-based clerk of works role, wasn't
14 it?
15 A. Yes.
16 Q. So that was someone on site every day.
17 Case study 2 --
18 SIR MARTIN MOORE-BICK: Sorry, is that right? Every day?
19 A. Yes.
20 MS GROGAN: Sorry, you do need to say "yes" or "no", rather
21 than just nodding.
22 A. Sorry, sorry.
23 Q. Case study 2, the second list of bullet points there,
24 again it says:
25 "We provided a multi-disciplinary service and single

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1 point responsibility for the following:
2 • "Clerk of Works
3 • "Contract Administration
4 • "Project Management ..."
5 And the list goes on.
6 Was that also a site-based clerk of works role?
7 A. I can't remember now.
8 Q. If we go on to page 13 {JRP00000295/13}, that's case
9 study 3. Again, that appears to be a clerk of works
10 role rather than the site inspector role; do you agree?
11 A. Sorry, let me just read the project again.
12 (Pause)
13 No, this is slightly different. This is where
14 a project -- not one of ours, though -- where they had
15 I think over 4,000 defects, and I think it may have been
16 a -- it was a JCT form of contract and we were asked to
17 go in -- it says there "independent certifier".
18 Sorry, if you can scroll down a bit.
19 This was two-phase: the first phase was to identify
20 what the defects were, and the second phase was to
21 recall the contractor to rectify their issues, and they
22 were to provide the design and to ensure its compliance.
23 We were monitoring that the work was completed, and
24 I think we were on site full-time because they had to do
25 the work and then close up. So we had to monitor that

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1 it was done.
 2 The sign-off and compliance of the specific products
 3 were by the contractor. So we were monitoring that it
 4 was being completed, if that makes sense.
 5 Q. So the first two case studies at least were for that
 6 more traditional clerk of works role that you've
 7 described. As you had interpreted this contract as
 8 being for the more limited site supervisor role, why did
 9 you give those examples?
 10 A. If you go back to 1 and 2, and something I said at the
 11 start, it was working on live sites, properties that are
 12 in occupation, and that covered the bandwidth, because
 13 the clerk of works would have had experience of working
 14 in those environments.
 15 Q. The bid itself doesn't make any distinction between the
 16 traditional clerk of works role and the site
 17 supervisor/monitoring role. Why did you not explain
 18 that in the bid?
 19 A. Well, I think it does. If you look at the brief again,
 20 a traditional clerk of works in my mind would have been
 21 on site 24 -- well, you say five days a week, and here
 22 we have been specifically requested to attend on
 23 a one-day-a-week basis to provide a report as per the
 24 client's request.
 25 Q. Could we go to {TMO10006200}, please. So this is the

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1 TMO's letter dated 12 June 2014 confirming John Rowan
 2 and Partners' appointment, and it's addressed to you
 3 there. It informs you that your tender has been
 4 successful and refers to JRP providing a general
 5 building clerk of works.
 6 When you saw that letter, did you think to clarify
 7 that it was not a traditional clerk of works role, or
 8 did you think that was understood?
 9 A. Sorry, I haven't seen this for six years.
 10 Q. Yes. So it's page 2 {TMO10006200/2} where it refers to
 11 clerk of works.
 12 (Pause)
 13 A. Yeah. If you go back again, you look at it -- if you go
 14 back to the page 1 {TMO10006200/1}, sorry, the reference
 15 is "Site Monitoring and Supervision Services". So,
 16 again, I would read that as clerk of works providing
 17 site monitoring and supervision services.
 18 This is a debate which rages on with clients, site
 19 inspectors, clerk of works, and has been going on since
 20 I have been involved in this type of work. It comes up
 21 probably every couple of weeks as to whether you should
 22 say site inspector, clerk of works, and after about
 23 ten years you get a bit fed up of trying to point out
 24 what the issue -- you know, the job title is every time.
 25 So when I read that, and I read the brief, I'm clear in

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1 my mind, and certainly those who have prepared the bid
 2 should be clear in their mind, that they've asked for
 3 a clerk of works to provide site monitoring and
 4 supervision services.
 5 Q. Why did you not make it crystal clear to the TMO in
 6 writing that that is what you thought that this project
 7 would entail?
 8 A. I read this and it's crystal clear.
 9 Q. Do you agree that by referring to Jon White and
 10 Tony Batty as clerks of works in correspondence, and by
 11 them issuing reports entitled clerk of works reports,
 12 others may have understood their role to be a more
 13 traditional clerk of works role?
 14 A. Not -- I couldn't answer for them, really.
 15 Q. You have said I think in your evidence that a meeting
 16 took place between Claire Williams, Jon White,
 17 Tony Batty and Luis Zarraoa. How was what happened at
 18 that meeting reported back to you?
 19 A. I think I'd seen that email probably a week or two later
 20 at the time. I definitely would have read it, because
 21 I would have asked Luis, "What are the specific terms of
 22 our engagement here? What has KCTMO asked us to do, so
 23 we're clear?"
 24 Q. We have been through that email with Jon White. I don't
 25 think we need to go back to it.

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1 A. I mean, from my perspective, if that was wrong, what we
 2 were asked to do, then I'm sure KCTMO would have fed
 3 back to us and said, "Sorry, that's not what we've asked
 4 you to do".
 5 MS GROGAN: Mr Chairman, I'm about to move on to a new
 6 topic.
 7 SIR MARTIN MOORE-BICK: Yes.
 8 MS GROGAN: I have only a few more pages to go, so I'm in
 9 your hands as to whether we break now for a short time
 10 or whether I continue for another ten minutes, say.
 11 SIR MARTIN MOORE-BICK: Do you think you can finish in
 12 ten minutes?
 13 MS GROGAN: I think it's probably a little bit longer than
 14 that, actually.
 15 SIR MARTIN MOORE-BICK: You are going to need a break at the
 16 end of your questions, anyway.
 17 MS GROGAN: We will, yes.
 18 SIR MARTIN MOORE-BICK: Mr Virdee, we have a break during
 19 the middle of the morning, and normally we would take it
 20 about now, but when counsel has finished asking the
 21 questions that she thinks she needs to put to you, we
 22 always have a break at that point to enable her to take
 23 stock and maybe field questions from other people who
 24 aren't in the room.
 25 It might be more sensible if we were to try and

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1 finish counsel's questioning and then take both breaks
 2 at the same time, if you see what I mean.
 3 THE WITNESS: Sure.
 4 SIR MARTIN MOORE-BICK: Would that be all right as far as
 5 you're concerned?
 6 THE WITNESS: Yes, that's fine.
 7 SIR MARTIN MOORE-BICK: I think that's what we'll do.
 8 Probably a quarter of an hour might do it?
 9 MS GROGAN: Yes. I'll keep a close eye on the time.
 10 SIR MARTIN MOORE-BICK: Yes, take your own time, don't feel
 11 rushed.
 12 MS GROGAN: Yes. If I feel like it's not going to be done,
 13 I'll let you know, in 15 minutes.
 14 SIR MARTIN MOORE-BICK: Yes, all right.
 15 MS GROGAN: Moving on now to the topic of Building Control,
 16 you have said in your statement -- and the reference for
 17 the transcript is {JRP00000333/10} -- that JRP had no
 18 contact with Building Control. JRP's employee Jon White
 19 may have had some limited contact but not in a formal
 20 capacity.
 21 What do you mean, "not in a formal capacity"?
 22 A. I think he informally saw him on site and had
 23 a conversation with him.
 24 Q. Who told you that?
 25 A. That was by my investigations. I was asked a set of

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1 questions by the Inquiry to answer some questions so
 2 I made some enquiries and that's what I found out.
 3 Q. So it's not something you were aware of at the time,
 4 it's something you found out later?
 5 A. Yeah.
 6 Q. In your view, is that sufficient to check that
 7 Building Control were checking, just to --
 8 A. Yeah.
 9 Q. -- come across them informally on site?
 10 A. Say that again, sorry?
 11 Q. So in your view, is the contact that Jon White had with
 12 Building Control sufficient to check that
 13 Building Control were checking for compliance?
 14 A. Yeah, from my experience on the site inspection role,
 15 and certainly over the last 16 years, you -- in this
 16 particular form of contract, you would check the logs of
 17 Building Control rather than have direct conversations
 18 with them, because that link isn't there between the two
 19 of us. That link is between the principal contractor
 20 and Building Control.
 21 Q. So the quality of information that you would have
 22 depends entirely on the quality of record-keeping of the
 23 main contractor?
 24 A. Yeah, on what's on site, yes.
 25 Q. At paragraph 27 of your statement {JRP00000333/7} you

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1 have said:
 2 "To the best of my knowledge we (JRP) were never
 3 supplied with any drawings and had very limited
 4 specifications. I certainly was not provided with these
 5 personally."
 6 As a manager, would you expect to be provided with
 7 those documents personally on a job?
 8 A. I'm yet to work on a project where they have
 9 successfully managed to have a full set of drawings on
 10 any online cloud-based storage facility. You tend to
 11 find that -- and this is from experience, I'm talking in
 12 the generic -- you may have some of the drawings on
 13 there, you may not have everything. I think also the
 14 fact that you're working on a D&B contract, some of the
 15 drawings can be fluid, they might not be there, they
 16 might still be being worked on. Your best chance of
 17 getting the most -- and it's also worth pointing out,
 18 it's only as good as those who are uploading the
 19 information on the cloud. So if they haven't got that
 20 on there, then you have to rely on what's on site.
 21 Q. Could you answer my question, though, which is: as the
 22 manager, you wouldn't be expected to be provided with
 23 those drawings personally, would you?
 24 A. You would hope to be, expected that they would be
 25 provided, yes.

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1 Q. To you personally?
 2 A. Not to me, no.
 3 Q. So what you have said in your statement there,
 4 "I certainly was not provided with these personally" --
 5 A. No, I --
 6 Q. -- that doesn't really matter, does it?
 7 A. No.
 8 Q. How do you know that on this project John Rowan and
 9 Partners were not provided with drawings?
 10 A. How do I know? I don't know.
 11 Q. You have put it in your statement. Who told you that?
 12 A. If you go to your question -- what was the question?
 13 Q. My question --
 14 A. Because I think your question would have prompted me to
 15 find out.
 16 Q. So it's as a result of checking John Rowan and Partners'
 17 records?
 18 A. Yeah, yeah.
 19 Q. So were you aware at the time that there was any issue
 20 with drawings or specifications not being provided?
 21 A. I wasn't aware of it being an issue at the time, and nor
 22 would I -- as I've just said earlier, it's a challenge
 23 on pretty much every job that you work on.
 24 Q. So in his statement to the Inquiry and in oral evidence,
 25 Mr White has said that he was able to view drawings in

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1 the site office, and he told us on Thursday there was
 2 never an occasion when he asked to see a drawing and was
 3 not provided with it.
 4 Do you agree that what you have said in your
 5 statement is not quite accurate?
 6 A. No, sorry, can you explain what you mean by not
 7 accurate?
 8 Q. Well, you say JRP were never supplied with drawings and
 9 had very limited specifications; Mr White says he was
 10 able to see everything he needed to see on site.
 11 A. Yeah, what I'm saying there is that I wasn't sent any
 12 drawings that would have been on site, so I think I'm
 13 agreeing -- no, I'm not agreeing ... they would have
 14 been on site and that's where he would have looked at
 15 them. What I'm saying is if a link had been sent and
 16 didn't work, I wouldn't be concerned about that, because
 17 the drawings that he'd really need to get hold of would
 18 be on site.
 19 Q. This passage of your witness statement gives the
 20 impression that that was a problem, that you never had
 21 drawings or access to the specifications.
 22 A. Could you --
 23 Q. Yes, we will pull it up. It is {JRP00000333/7},
 24 paragraph 27.
 25 A. "To the best of my knowledge ..."

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1 (Pause)
 2 Q. So the question asked by the Inquiry is:
 3 "What access did you have after this time ..."
 4 Referring to an email --
 5 A. I wouldn't have had any access, as I wouldn't have
 6 seen ...
 7 Q. But you've answered the question on behalf of John Rowan
 8 and Partners, "we ... were never supplied with any
 9 drawings". Based on Jon White's evidence, I'm asking
 10 you whether you wish to correct that now?
 11 (Pause)
 12 A. I'm trying to -- I'm just having a bit of difficulty
 13 trying to understand what you're asking.
 14 So are you saying that the drawings were on site and
 15 that we had access to the drawings?
 16 Q. That is what Mr White said, that he had access to
 17 everything he needed on site.
 18 A. He had to access to drawings on site if he needed to
 19 refer to, so that would make sense, if he had access to
 20 them.
 21 SIR MARTIN MOORE-BICK: I think we've got the picture.
 22 MS GROGAN: We do, thank you.
 23 SIR MARTIN MOORE-BICK: You didn't get a set of drawings --
 24 A. I didn't personally have --
 25 SIR MARTIN MOORE-BICK: Well, no one sent a set of drawings,

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1 either in physical copy or by a link, to you or
 2 Mr White, but when he wanted to see a drawing on site,
 3 he was able to get it?
 4 A. Yeah. That makes sense.
 5 SIR MARTIN MOORE-BICK: Okay.
 6 MS GROGAN: Moving on to a new topic, which is the price for
 7 the works, if we go back to your bid, {JRP00000295/25}.
 8 Now, you were asked to bid for and you have in fact bid
 9 here for 70 days per clerk of works on site. Do you see
 10 that in the box there?
 11 A. Yes.
 12 Q. So 70 days each, and you have given a rate there.
 13 That's a total of 140 days, isn't it?
 14 A. It is, yeah.
 15 Q. If we could now go to {JRP00000332/2}, this is the email
 16 that you think you saw a little later dated 18 September
 17 from Claire Williams to Luis Zarraoa, where she
 18 summarises the meeting and her instructions. In that
 19 first paragraph, about halfway down, she says:
 20 "I said that I would like to skew the number of days
 21 potentially for each clerk of works, which was
 22 originally proposed as 40 days each."
 23 You had in fact bid for many more days than that.
 24 Were you aware at the time that the requirement from
 25 the client had been reduced?

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1 A. That would have come up in the TBMs, task-based
 2 management reviews, one-to-ones I would have had with
 3 Luis on a resourcing side of things as to who is doing
 4 what.
 5 Q. Do you know why the time was reduced?
 6 A. I can only assume.
 7 Q. And what do you assume?
 8 A. My understanding of that would be -- so if it's skewed
 9 for M&E and less for building work, is that the M&E took
 10 precedence at that time.
 11 Q. I mean the overall time, so it's reduced from 140 to 80.
 12 A. Oh, the reduced -- oh, for 140 to 40?
 13 Q. 140 to 80.
 14 A. 140 to 80. Well, again, it comes down to what we said
 15 at the start. I could have read that to be: come in
 16 one day a month, at that time, because it's ultimately
 17 up to the client how they wish to use that resource. So
 18 in my mind at that time I thought: okay, if it's gone
 19 from 70 to 40, maybe they don't -- maybe they're
 20 comfortable with what they're getting from the principal
 21 contractor, or it might be a budgetary issue.
 22 Q. Did you think that 40 hours each --
 23 A. 40 days.
 24 Q. Sorry, 40 days each was sufficient to carry out the
 25 duties required of the two clerks of works?

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1 A. In terms of what they were asked to do, in terms of
2 their reports and what they were asked to do, that's not
3 uncommon.

4 Q. Moving on now to my final topic, if we could go, please,
5 to {MET00045627}.

6 (Pause)

7 So this is an email from you dated 14 June 2017 at
8 9.39 to "JRP-All Staff", and you say:

9 "Dear All,

10 "You may have seen the news of the tragic fire at
11 Grenfell Tower and I trust that the emergency services
12 are doing all they can to save as many residents as
13 possible.

14 "It may be worth noting that we did have some
15 involvement on the refurbishment works that took place
16 at the tower albeit as site inspector's ... with design
17 and project management responsibilities resting with
18 others."

19 Then you go on to say you have spoken with the team.
20 Then the next paragraph:

21 "From having seen the footage it appears that the
22 external cladding/insulation has accelerated the spread
23 of flame which has then made its way back into the
24 building. I suspect that once all the investigations
25 have taken place we may see a change in building

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1 regulations and how buildings are overclad."

2 Had you been told anything by Jon White prior to
3 this about what materials were used in the cladding?

4 A. No.

5 Q. Having observed the rapid spread of flame up the tower,
6 did you draw any conclusions about what materials may
7 have been used?

8 A. No.

9 Q. Given that, so far as you knew, Building Control had
10 checked the cladding and passed it as compliant with the
11 Building Regulations, were you surprised to see the
12 cladding behave that way in the fire?

13 A. Yes.

14 Q. What was it about the Building Regulations that you
15 thought would need to change?

16 A. I mean, when you -- I remember seeing the footage and
17 I felt that there would be an issue with building regs
18 and how projects would be run going forward, because
19 there would obviously be an investigation into such
20 things. So my feeling at the time was that we'll see
21 something coming out of this.

22 Q. So did you draw the conclusion that it was likely to be
23 a failure of regulation rather than a failure of design?

24 A. I mean, I can only talk about what I know more of now,
25 and I think there's a lot of confusing things out there

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1 in the market and it needs to be cleared up. The more
2 simple -- things do not have to be complicated, they can
3 be very simple if there's simple instructions for
4 everybody to follow, and that's -- and I think
5 everything has got a little bit complicated as to how
6 things work, from procurement to responsibility to
7 regulations, the whole lot.

8 Q. If we could go now to {MET00045634}, and if we go to the
9 email from Sean Tobin at the bottom, 15 June 2017 at
10 8.07 am, he is emailing Jon White but you are also on
11 the address list:

12 "Jon

13 "Peter Maddison (Property Services Director at
14 KCTMO) contacted me very late last night (11pm) and has
15 requested JRP's assistance & support in gathering as
16 much intelligence on the refurbishment project at
17 Grenfell Tower a couple of years back, where we were
18 SI/CoW on the project."

19 He then goes on to list the information sought by
20 KCTMO.

21 If we go down to the next page of the email chain
22 {MET00045634/2}, at the end he says:

23 "If you would like an internal meeting between all
24 of us on this e-mail please let us know."

25 Then we have to scroll back up again, back to page 1

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1 {MET00045634/1} to see the reply. There is a reply
2 there from Andrew Crosher. He says that Jon is very
3 busy, suggests that an admin person should collate the
4 information, and then a review should take place.

5 Did that internal review take place?

6 A. Sorry, I haven't seen this for ...

7 Q. So it's the last paragraph of that email:

8 "Then we can have a review maybe with Jon assisting
9 and providing additional background, I've cc'd Luis who
10 needs to be aware of this as Jon's line manager and also
11 may have some additional knowledge/input."

12 Did you conduct an internal review?

13 A. I can't actually remember. We would have sat down to
14 discuss ... I think first and foremost, I think
15 I remember Jon was in a bad way, and then we sat down
16 with Luis to talk about the project, and I think the
17 files would have been there. So I don't know whether
18 a full review would have been carried out. To be
19 honest, I can't recall.

20 Q. Do you recall shortly after the fire discussing what
21 JRP's role was on the project?

22 A. I remember looking back at the brief, yes.

23 Q. And when you looked at the brief, was that consistent
24 with your understanding of what had actually been done
25 on site?

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1 A. Yeah.
 2 Q. If we look at the email just from the top of this chain,
 3 we will see Jon White's response. He says:
 4 "For further info, the [windows] were replace[d] in
 5 [uPVC] as part of the contract."
 6 Did you understand from this that Jon White had
 7 concerns about the use of uPVC?
 8 A. No, I think he was just saying that the windows --
 9 I think maybe someone may have asked the question, and
 10 he's just giving us some further information.
 11 Q. Did the use of uPVC in the windows cause you any concern
 12 when you became aware of it?
 13 A. No.
 14 MS GROGAN: Thank you, Mr Chairman, those are all of my
 15 questions.
 16 SIR MARTIN MOORE-BICK: Right. Well, that would be a good
 17 time to have our break, then, wouldn't it?
 18 MS GROGAN: Yes.
 19 SIR MARTIN MOORE-BICK: Mr Virdee, we're going to have the
 20 break now. We will come back at 11.55, please.
 21 THE WITNESS: Okay.
 22 SIR MARTIN MOORE-BICK: I don't think you will have much
 23 chance to talk to anyone about your evidence while
 24 you're out of the room, but if it does occur, please
 25 don't take it. All right?

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1 THE WITNESS: Thank you.
 2 SIR MARTIN MOORE-BICK: We'll see you in a minute. If you'd
 3 like to go with the usher, please. Thank you.
 4 (Pause)
 5 I think that will give you enough time to deal with
 6 anything that might have come from elsewhere.
 7 MS GROGAN: Yes.
 8 SIR MARTIN MOORE-BICK: Thank you very much, 11.55, please.
 9 (11.40 am)
 10 (A short break)
 11 (11.56 am)
 12 SIR MARTIN MOORE-BICK: All right. Well, now we will see if
 13 there are any more questions.
 14 Ms Grogan, did you find some questions?
 15 MS GROGAN: I did, just two short questions, Mr Chairman.
 16 First of all, Mr Virdee, what systems were in place
 17 to supervise Jon White and ensure he carried out his job
 18 adequately?
 19 A. So he would have had task-based management one-to-ones
 20 with Luis, so whereby they would talk about all the
 21 projects that he's working on, identify any issues,
 22 challenges, and that would also include any challenges
 23 from his own workload perspective, but also any
 24 challenges that he's having on site, and then we would
 25 take it from there.

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1 Q. Did you ever, including after the fire, come to be aware
 2 of any concerns about how Jon White performed on the
 3 Grenfell project?
 4 A. No. Never after nor during.
 5 MS GROGAN: Thank you very much.
 6 Thank you, that's all my questions.
 7 SIR MARTIN MOORE-BICK: Well, Mr Virdee, those are all the
 8 questions we have for you. It just remains for me to
 9 thank you very much for coming here to give your
 10 evidence this morning, it's been very helpful to hear
 11 from you, and now you're free to go. Thank you very
 12 much.
 13 THE WITNESS: Thank you.
 14 (The witness withdrew)
 15 SIR MARTIN MOORE-BICK: Now, we'll need to rise for a few
 16 minutes before the next witness comes in, so that the
 17 usual cleaning arrangements can be undertaken.
 18 MS GROGAN: Yes, that's right. We have checked and we need
 19 ten minutes, and then it will be Mr Mark Osborne.
 20 SIR MARTIN MOORE-BICK: Well, what I'm going to suggest is
 21 come and tell us as soon as you're ready, that's the
 22 best thing. All right?
 23 MS GROGAN: Yes, thank you.
 24 SIR MARTIN MOORE-BICK: Thank you very much indeed.
 25 (11.58 am)

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1 (A short break)
 2 (12.09 pm)
 3 SIR MARTIN MOORE-BICK: Yes, Ms Grange.
 4 MS GRANGE: Good morning.
 5 SIR MARTIN MOORE-BICK: Who are we calling next?
 6 MS GROGAN: Our next witness is Mr Mark Osborne, please.
 7 SIR MARTIN MOORE-BICK: Thank you.
 8 Would you ask Mr Osborne to come in, please.
 9 MR MARK OSBORNE (affirmed)
 10 SIR MARTIN MOORE-BICK: Thank you very much, Mr Osborne.
 11 Would you like to sit down and make yourself
 12 comfortable, please. All right?
 13 Yes, Ms Grange.
 14 Questions from COUNSEL TO THE INQUIRY
 15 MS GRANGE: Yes, thank you.
 16 Thank you, Mr Osborne. Thank you very much for
 17 coming and giving evidence today, it's very much
 18 appreciated.
 19 I will be asking you the questions today. If you
 20 have any difficulty understanding anything I'm asking
 21 you, please either ask me to repeat the question or put
 22 the point in a different way.
 23 Also, can you please try and keep your voice up,
 24 because the lady on your right is transcribing
 25 a transcript of everything we're saying, and she needs

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1 to be able to hear you clearly , so if you can keep your
 2 voice up, that would be great.
 3 Now, you have made two witness statements for
 4 the Inquiry. Those appear in a folder in front of you
 5 and they're also going to appear on the screen in
 6 a moment. If we can go to the first , this is
 7 {OSB00000087}. We can see there there's a date on it ,
 8 27 September 2018, and if we also go to the final page,
 9 {OSB00000087/7}, there we have the date again.
 10 Is that your signature?
 11 A. That is my signature.
 12 Q. Have you read that statement recently?
 13 A. I have.
 14 Q. Are the contents true?
 15 A. They are.
 16 Q. Thank you.
 17 If we can bring up your second witness statement to
 18 the Inquiry, this is {OSB00000090}, and if we turn on to
 19 page 13 {OSB00000090/13}, we can see that this second
 20 statement is dated 27 June 2019. Is that your signature
 21 there?
 22 A. That is my signature.
 23 Q. Great. Have you read that statement recently?
 24 A. I have.
 25 Q. Can you confirm that the contents are true?

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1 A. The contents are true.
 2 Q. Now, Osborne Berry also provided a position statement to
 3 the Inquiry, which you have referred to and expressly
 4 adopted in your second witness statement. Can we just
 5 bring that up. That's at {OSB00000084}. Is that the
 6 position statement that you're referring to?
 7 A. It is.
 8 Q. Did you assist in the preparation of that position
 9 statement?
 10 A. I did.
 11 Q. Again, are the contents of it true?
 12 A. They are.
 13 Q. Have you discussed your evidence with anyone before
 14 coming here today?
 15 A. No, I haven't.
 16 Q. Thank you.
 17 I just want to start with some questions about your
 18 professional background and your training.
 19 If we look at paragraph 3 of your first witness
 20 statement, so that's {OSB00000087/5}, under question 3
 21 there you explain to us that:
 22 "Prior to the incorporation of Osborne Berry, I had
 23 worked as a fitter carrying out work for Harley for
 24 about twenty years."
 25 Do you see that there?

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1 A. I do.
 2 Q. Now, did your work as a fitter involve the installation
 3 of building envelopes?
 4 A. It did.
 5 Q. Were you fitting anything else or was it always external
 6 wall features?
 7 A. External only.
 8 Q. Would that include items such as curtain walling,
 9 rainscreen cladding façades, windows, doors and
 10 structural glazing?
 11 A. It would.
 12 Q. Now, we know that Osborne Berry was incorporated in
 13 2002; that's right, isn't it?
 14 A. That's correct.
 15 Q. So at the time of Osborne Berry's instruction by Harley
 16 in 2014 on the Grenfell Tower refurbishment, is it right
 17 that you had some 32 years' experience in the
 18 installation of building envelopes?
 19 A. I did.
 20 Q. Have you ever undertaken any formal training or
 21 qualifications in relation to installing building
 22 envelopes?
 23 A. I haven't.
 24 Q. So does that mean that effectively you learned on the
 25 job? Is that how --

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1 A. Learned as I went along, yes.
 2 Q. -- it happened? Did you start off as apprentice
 3 somewhere and move up or ...?
 4 A. I was an apprentice back in 1973 for a company called
 5 Windshields of Worcester, and then I worked my way up.
 6 I did a full apprenticeship, worked my way up then to
 7 a fitter , and then basically moved from company to
 8 company until I set my own company up.
 9 Q. Have you undertaken any formal training or
 10 qualifications in relation to the installation of
 11 rainscreen cladding façades specifically ?
 12 A. Not at all , no.
 13 Q. What about any formal training in respect of fire safety
 14 in terms of installation and fitting work?
 15 A. Only what I have been shown as I've gone along in the
 16 trade, basically .
 17 Q. Yes, okay.
 18 Now, if we look at page 2 {OSB00000087/2} of your
 19 first witness statement, and we look towards the bottom
 20 of the page, you say there that:
 21 "Osborne Berry have installed the same cladding in
 22 other buildings in London Hounslow and Little Venice."
 23 You make clear, right at the very bottom -- you're
 24 asked "These particular cladding panels", and you give
 25 the answer, "Yes".

72

1 Just staying with this theme of other similar
 2 projects, if we look at page 1 of your second witness
 3 statement, that's {OSB00000090}, at paragraph 1(a),
 4 you're asked about projects in which Osborne Berry were
 5 engaged by Harley Façades, and you say this:
 6 "Osborne Berry were sub-contracted to work on 5
 7 tower blocks in Little Venice, 1 tower block in Hounslow
 8 and a tower block and lower riser buildings in
 9 Commercial Road."
 10 So you say that there.
 11 Were these buildings -- so we've got five
 12 tower blocks in Little Venice, one in Hounslow, and one
 13 in Commercial Road -- residential, non-residential or
 14 mixed-use buildings?
 15 A. I believe the Commercial Road was mixed.
 16 Q. Yes.
 17 A. But as for Little Venice, that's five domestic
 18 tower blocks --
 19 Q. Right, yeah.
 20 A. -- for residents, basically.
 21 Q. So solely residential, yes.
 22 Were any of those buildings over 18 metres tall?
 23 Were they large high-rise buildings?
 24 A. Little Venice, definitely, 20 floors.
 25 Q. Yes. And the other two? What about Hounslow?

73

1 A. Hounslow, I only actually went up there to do the
 2 setting-out details --
 3 Q. Yes.
 4 A. -- on heights and grids. I'm -- off the top of my
 5 memory, I think it was 10 or 11 floors, but I wouldn't
 6 guarantee that one. But Commercial Road, that was
 7 probably 15 floors per tower block.
 8 Q. Right, yes.
 9 Is it correct that Osborne Berry installed ACM,
 10 aluminium composite material panels with a PE,
 11 polyethylene, core at the sites in Hounslow and
 12 Little Venice?
 13 A. That's correct.
 14 Q. Yes. So you did, as a firm, have previous experience of
 15 installing ACM to a building over 18 metres in height
 16 prior to the Grenfell project?
 17 A. We did, the only difference being that the panels at
 18 these other two jobs were riveted-on panels, not hook-on
 19 panels.
 20 Q. Yes. So they were rivets and not cassettes, as we have
 21 come to know them; is that correct?
 22 A. That's correct.
 23 Q. Thank you.
 24 Was Osborne Berry a member of any trade associations
 25 at the time it worked on the Grenfell project?

74

1 A. No.
 2 Q. No?
 3 A. No.
 4 Q. It helps if you say an answer rather than just nod or
 5 shake your head, so we've got something on the
 6 transcript, thank you.
 7 A. That's fine.
 8 Q. On the Grenfell project, did you carry out any
 9 installation work yourself or did you always leave that
 10 to fitters who were employed by Osborne Berry?
 11 A. No, I worked on it myself as well.
 12 Q. So you weren't just supervising the installation of
 13 others, you actually fitted it --
 14 A. Physically worked.
 15 Q. -- physically yourself?
 16 A. Yeah.
 17 Q. Just a few questions about the preparation of your
 18 witness statements to the Inquiry. If we go and look at
 19 page 5 of your first witness statement, {OSB00000087/5},
 20 at paragraph 1 you explain there that Osborne Berry, in
 21 the second line, is a small company and you give
 22 a little more information about the company: consists of
 23 two directors, yourself and Mr Grahame Berry;
 24 a secretary, Mr Berry's wife; and one employee, who is
 25 employed as a fitter. We've got that information there.

75

1 You also explain that on occasions the company
 2 subcontracts work and uses self-employed fitters to
 3 assist with its work. That's correct, isn't it?
 4 A. That is correct.
 5 Q. Is it correct that when you were working on site,
 6 Mr Berry was known as Bez and you were known as Taff; is
 7 that correct?
 8 A. That is correct.
 9 Q. Yes.
 10 Now, if we can look side by side at this part of
 11 your statement -- we might need to pan out so we can see
 12 paragraphs 1 through to 3 on this page 5 -- and we put
 13 that side by side with Mr Berry's first witness
 14 statement, at page 5, that's {OSB00000086/5}, what we
 15 see here is very similar answers that are given to these
 16 first three questions. In fact, the wording of
 17 paragraphs 1, 2 and 3 are not totally identical, but
 18 they're almost identical.
 19 Looking at paragraph 3 of your own statement there
 20 on the left, we can see in that first paragraph you say:
 21 "Prior to the incorporation of Osborne Berry, I had
 22 worked as a fitter carrying out work for Harley for
 23 about twenty years. Mr Osborne was also working as a
 24 self-employed fitter for Harley ..."
 25 Do you see that there?

76

1 A. I do.
 2 Q. So you have referred to yourself in the third person in
 3 that part of your statement. Do you see that?
 4 A. Yes.
 5 Q. If you look at paragraph 1, in fact, on that same page,
 6 in the second substantive paragraph down, you have said:
 7 "Osborne Berry undertakes work for private
 8 individuals, companies and local authorities."
 9 Then you say it provides the labour and fitters, and
 10 in brackets you say:
 11 "... (this includes Mr Osborne and myself) ..."
 12 Do you see that there?
 13 A. I do.
 14 Q. So, again, you have talked about yourself in the third
 15 person.
 16 A. Yeah.
 17 Q. If we go to page 1 of your first witness statement now,
 18 {OSB00000087}, if we look in that very first paragraph
 19 underneath the date, you say there:
 20 "I wish to adopt the comments made in
 21 Osborne Berry's position statement which details the
 22 extent of my involvement and that of my business
 23 partner/director Mr Mark Osborne ..."
 24 So, again, you have referred to yourself in the
 25 third person there. Do you see that?

77

1 A. I do.
 2 Q. Now, would you agree with me that it looks like possibly
 3 some of this text might have been prepared for
 4 Mr Berry's statement and has gone into your statement?
 5 Do you see that?
 6 A. I do see that. But --
 7 Q. Do you agree that in large measure the two statements
 8 you have provided to the Inquiry are very similar?
 9 A. I do agree with that.
 10 Q. Can you help us as to how that came about? Did you sit
 11 down and prepare your statements at the same time?
 12 A. No, we didn't prepare our statements at the same time,
 13 but we had talked about --
 14 Q. Right.
 15 A. -- different things.
 16 Q. Did you discuss with each other what you were going to
 17 put in the statements?
 18 A. I don't recall discussing with each other that, no.
 19 Q. Did you check your own witness statement carefully
 20 before it was finalised? Did you have some input into
 21 the words that were used in it?
 22 A. Probably not. I'm not very good at paperwork.
 23 Q. I see.
 24 So you have signed this witness statement, and
 25 I think you confirmed at the beginning of your evidence

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1 you have read it and checked that it's true.
 2 A. I have read it, yeah.
 3 Q. But is it possible that at the time you first signed it,
 4 you perhaps hadn't checked it as carefully as you should
 5 have done?
 6 A. I would think that is probably very true.
 7 Q. Okay, thank you.
 8 When you were preparing your statement, or in the
 9 run-up to preparing it, did you have any documentation
 10 with you to help you and remind you about what had
 11 happened on the project?
 12 A. Not at all.
 13 Q. Does Osborne Berry generally keep records of past
 14 projects in terms of documentation that you or the
 15 fitters would have been provided with?
 16 A. No.
 17 Q. No?
 18 A. I would keep a diary whilst the job was in progress, but
 19 those diaries wouldn't be kept after the job was
 20 finished, basically.
 21 Q. Okay. And what's done with those diaries? Do you
 22 destroy them?
 23 A. They were destroyed.
 24 Q. Yes, okay.
 25 Now, in terms of how Osborne Berry came to be

79

1 engaged on the refurbishment project, is it your
 2 understanding that, in about August 2014, Mr Ben Bailey
 3 of Harley contacted your company about whether it was
 4 interested in working on the project?
 5 A. I don't recall it being Ben, I think it was
 6 Ray Bailey --
 7 Q. Ah, okay.
 8 A. -- his father, and --
 9 Q. Is it right -- sorry.
 10 A. And he made a telephone conversation, I believe --
 11 Q. Yes.
 12 A. -- to my business partner.
 13 Q. Mr Berry, is that right?
 14 A. Yeah.
 15 Q. So that was my next question: is it right that it was
 16 actually Mr Berry that took that first call --
 17 A. That's correct.
 18 Q. -- with the enquiry for the project?
 19 A. That's correct.
 20 Q. You say in your statement at paragraph 2(a) -- we don't
 21 need to pull it up -- that Mr Berry told you that Harley
 22 had asked Osborne Berry to fit windows and cladding to
 23 Grenfell Tower.
 24 Did Mr Berry say anything to you at that stage about
 25 whether materials had been discussed for the project and

80

1 what materials would be used?

2 A. We just knew it was an ongoing job. We didn't know

3 exactly what was going to be used, no.

4 Q. Yes.

5 Then if we can turn up {OSB00000087/5}. This is

6 under paragraph 3. In the last line of that first

7 paragraph, you say this:

8 "Osborne Berry was one of the three preferred teams

9 Harley instructed. Osborne Berry submitted

10 a competitive tender which was accepted by Harley."

11 Do you see that there?

12 A. I do.

13 Q. Now, do you mean that there was a competitive tender for

14 the Grenfell project, or are you talking about a tender

15 more generally to Harley to be one of its preferred

16 installation companies?

17 A. I presume we would -- we put a tender in and Harley

18 would choose which one was the most viable one to use.

19 But I know other people tendered for that job.

20 Q. Yes, and that's a tender specific to the Grenfell Tower

21 project, was it?

22 A. Specific to the Grenfell Tower project.

23 Q. When you say you know other people tendered for that

24 job, how do you know that?

25 A. Only from hearsay.

81

1 Q. Right. From talking to other contractors at the time?

2 A. Correct.

3 Q. Yes.

4 Now, if we can turn up {OSB000000061}, if we zoom in

5 on the top email, this is an email from Rob Maxwell of

6 Harley to Osborne Berry, and it's dated

7 24 September 2014. It says:

8 "Bez,

9 "Use this to price the project.

10 "Kind Regards

11 "Rob Maxwell."

12 Do you see that there?

13 A. I do.

14 Q. Did you see that email at the time, can you recall?

15 A. I didn't.

16 Q. So was it Mr Berry dealing with this at this stage?

17 A. Mr Berry was dealing with this at this stage.

18 Q. Does he always deal with the initial contract scope and

19 the price?

20 A. He deals with the paperwork side of it because that's

21 not my best quality, I'm afraid.

22 Q. I see. That's helpful.

23 What we see is at the very bottom of page 3

24 {OSB000000061/3}, what was attached to this email in the

25 very first bullet point there, this E3317 cost summary,

82

1 was a Grenfell Tower schedule of quantities. I will

2 show it you in a minute, but can you recall whether you

3 saw that document at the time?

4 A. I saw the bill of quants, yes.

5 Q. Yes, you saw that.

6 Now, between the first enquiry about the project in

7 August 2014 and Mr Berry's receipt of this email on

8 24 September 2014, can you recall whether you had any

9 other conversations around this time with Harley about

10 the proposed work at Grenfell Tower?

11 A. I can't remember any, no.

12 Q. So let's just turn up the cost summary. So it's

13 {OSB000000051}. Is this what you were just referring to

14 as the bill of quants, the bill of quantities?

15 A. That's the bill of quants, yes.

16 Q. What we see in this document is they have broken down

17 the elements of the work and the particular products

18 that would be installed on the rainscreen system and

19 given you just the quantities involved; is that correct?

20 A. Yes, that's correct.

21 Q. Is that how you would normally end up pricing for a job,

22 by seeing a document like this?

23 A. Exactly, because somebody's already brought this to this

24 stage. For us to actually go back through the drawings

25 and work all this out ourselves would take so long the

83

1 job would be delayed considerably.

2 Q. So this shortcuts that and just tells you the

3 quantities?

4 A. Correct.

5 Q. Is this, therefore, what you understood you would be

6 installing?

7 A. That is, yes.

8 Q. Yes.

9 A. Yes.

10 Q. Then just following the story through, if we go to

11 {OSB000000046}, this is then an email from Bez, that's

12 Mr Berry, to Mr Maxwell of Harley of 29 September 2014,

13 and it says, we can see at the top there:

14 "Price for job £252,465.00."

15 Do you see that there?

16 A. I do.

17 Q. He says:

18 "Any problems give me a ring and let me know ASAP if

19 price is ok to carry on working.

20 "Thanks bez."

21 Do you see that there?

22 A. I do.

23 Q. So we can see here that Mr Berry is providing a lump sum

24 for the job. Do you know how that price was calculated?

25 A. On square metreage, per item on that, on --

84

1 Q. I see. So you look at the material --
 2 A. Yes, and you know --
 3 Q. -- and you have an understanding of the complexity of
 4 installing that material, do you?
 5 A. Yes, yes.
 6 Q. And so you have a standard price per metre square --
 7 A. Yes, per metreage, yes.
 8 Q. -- that you apply to that.
 9 Were you involved in assisting with the calculation
 10 of the price for the job?
 11 A. Oh, yes, definitely.
 12 Q. Yes.
 13 A. Definitely.
 14 Q. So what would your involvement comprise?
 15 A. Basically sit down and talk to Grahame about how long we
 16 thought it would take, how much work would be involved,
 17 go through the metreage prices and then just put the
 18 prices down on the quantities, basically.
 19 Q. You have said there "how long we thought it would take",
 20 so does that mean you would be proposing back to Harley
 21 how long the job would take as opposed to Harley saying
 22 to you --
 23 A. No, no, no, how long we would think it would take to do
 24 that particular item --
 25 Q. I see.

85

1 A. -- then we would know how much labour we would need to
 2 actually complete that item or the items.
 3 Q. I see.
 4 Would you have been told by this time the length of
 5 time the project was due to last?
 6 A. I really cannot remember that.
 7 Q. Right, yes.
 8 A. I would probably say yes, but I wouldn't give you
 9 a guarantee.
 10 Q. Yes. And this price for the job here that we see, is
 11 that what you have described in your statement as the
 12 submission of a competitive tender for the work?
 13 A. That is correct.
 14 Q. Was there any other document which formed part of
 15 Osborne Berry's tender, for example a method statement
 16 or other description of how you would go about the
 17 works?
 18 A. Not at the time. We wouldn't receive method statements
 19 until we actually got on to site and got the job,
 20 basically.
 21 Q. Right, yes.
 22 A. And they would be site-specific to various tasks which
 23 are on the actual building.
 24 Q. Yes, I see. So you wouldn't have supplied Harley with
 25 any other information, for example about who might be

86

1 carrying out the works, the qualifications of those
 2 carrying it out, nothing like that, just the price?
 3 A. Just the price.
 4 Q. Okay.
 5 So I now just want to ask you some questions about
 6 the information that was provided to Osborne Berry prior
 7 to commencing the installation works. If we can turn up
 8 page 5 of your second witness statement,
 9 {OSB00000090/5}, at paragraph 7(c), so that's the second
 10 item down on that page, you're asked the question:
 11 "Did the measurements taken by Osborne Berry
 12 correspond to the dimensions given on the plans/drawings
 13 given to Osborne Berry by Harley?"
 14 You say this:
 15 "Osborne Berry did not receive any initial plans.
 16 We were simply tasked to obtain measurements."
 17 Do you see that there?
 18 A. Yes.
 19 Q. Can you help us, where you say "Osborne Berry did not
 20 receive any initial plans", what do you mean by that?
 21 What kind of initial plans might you have expected to
 22 receive?
 23 A. Erm ... I don't really know what plans I would have
 24 expected to see. All I remember seeing was actually
 25 pictures of the tower block on all elevations.

87

1 Q. Yes.
 2 A. Positions where we were asked to measure from and to --
 3 Q. Yes.
 4 A. -- to give dimensions back to Harley so they could
 5 manufacture the cladding and the windows to those
 6 positions.
 7 Q. When you say pictures, were those elevation drawings
 8 or --
 9 A. Elevation drawings.
 10 Q. So they weren't photographs, they were drawings?
 11 A. They were drawings, yes. They didn't say what was going
 12 on the drawing, it was just an elevation drawing of the
 13 building.
 14 Q. Yes. And Harley pinpointed to you where they wanted you
 15 to take some measurements?
 16 A. They wanted to know what the measurements were.
 17 Q. I understand.
 18 Did you ask for any specific documentation,
 19 drawings, plans, specifications, relevant to the project
 20 before Osborne Berry started on site?
 21 A. I would have thought so, yes.
 22 Q. Yes.
 23 A. I would have thought so.
 24 Q. But you can't help us as to whether in fact such
 25 documentation was received on this project?

88

1 A. I can't.
 2 Q. Okay.
 3 A. I can't, I'm sorry.
 4 Q. You talked for a moment there about being tasked to
 5 obtain measurements, and I think you're referring there
 6 to a process you describe in your second statement --
 7 this is paragraph 7, page 4 {OSB00000090/4}, we don't
 8 need to turn it up -- where early on you measured the
 9 gaps between windows, the width and height --
 10 A. That's correct.
 11 Q. -- in comparison with the concrete structure, and also
 12 the centre lines of the columns; is that right?
 13 A. That is correct.
 14 Q. So you did that measurement exercise and discovered that
 15 some of the columns weren't plumb, is that right?
 16 A. That is correct.
 17 Q. And then you passed that information back to Harley so
 18 they had exact measurements on the tower; is that right?
 19 A. That is correct.
 20 Q. Yes.
 21 You say that that job of measuring took two days.
 22 Can you recall roughly when you carried out that work?
 23 We know you were first approached in August 2014 in
 24 relation to this project. Can you recall how long after
 25 that you would have done that measurement work?

89

1 A. I don't --
 2 Q. Okay.
 3 A. -- to be truthful.
 4 Q. Now, sticking with the topic of drawings and information
 5 provided to you, if we can look at {OSB000000027}, this
 6 is a register of drawings. Don't worry, I'm going to go
 7 to a better version of this in a moment, but I just want
 8 to establish that this is a register of drawings, it's
 9 a Harley register of drawings, and it's been disclosed
 10 to the Inquiry by Osborne Berry.
 11 Now, the quality of this is quite poor, so what
 12 we're going to do is take you another better quality of
 13 it from Rydon's disclosure. So if we can bring up
 14 {RYD00056337}. So this we believe is an identical
 15 document to the one from Osborne Berry's disclosure.
 16 Did you see this Harley drawing register during the
 17 time you worked on the project?
 18 A. I cannot remember seeing it, no.
 19 Q. Would you normally expect to see a drawing register like
 20 this --
 21 A. No.
 22 Q. -- on such a project?
 23 A. No, I would leave that to the likes of Rob Maxwell to
 24 deal with and Ben Bailey, the actual drawing register,
 25 to make sure they all came and they then would hand them

90

1 over to us.
 2 Q. And how would they hand them over to you? What was the
 3 process for that?
 4 A. As the drawings were updated, revision A, revision B,
 5 revision C, they would tell you to remove revision A,
 6 revision B has taken over.
 7 Q. Where would you actually be removing these from and
 8 replacing these? Did you have them in hard copy or
 9 electronically?
 10 A. In hard copy.
 11 Q. Where were they physically?
 12 A. They were stored in our container where we kept all our
 13 materials and all our tools.
 14 Q. So you had, what, a site cabin on the site?
 15 A. We had a container on site, yes.
 16 Q. And you would keep copies of the drawings in that
 17 container; is that right?
 18 A. Correct.
 19 Q. For all your operatives to see or just you and Mr Berry?
 20 A. No, whoever needed to look at it was able to look at it.
 21 Q. I see. So you expected that if there was a revision to
 22 a drawing that, what, you would be brought the
 23 replacement?
 24 A. We would be brought the replacement, the old one would
 25 be destroyed.

91

1 Q. Yes. Were you yourself actually involved in that
 2 process on the Grenfell project?
 3 A. I did -- I destroyed quite a lot of drawings, yes.
 4 Q. Yes.
 5 A. Yeah.
 6 Q. Would you have looked at any of those drawings before
 7 you got to site or would you look at them basically on
 8 the first day on site?
 9 A. On the first day on site.
 10 Q. Yes.
 11 Then if we just pick up on the same theme, looking
 12 at Mr Berry's witness statement to the police that he's
 13 provided, this is {MET00019985}. This is a statement of
 14 me Mr Berry to the Met Police. It's dated, we can see
 15 there in that box at the top, 21 August 2017, and I just
 16 want to pick it up at the bottom of this page 1 and on
 17 to page 2. So this is where he's describing that
 18 measurement process that we were just discussing
 19 a moment ago, and he says four lines up:
 20 "The measurements were done by tape measure. Mark
 21 and Rob stayed doing this for around a week."
 22 Is that you, Mark Osborne?
 23 A. That's correct, yes.
 24 Q. And Rob Maxwell, is that?
 25 A. No, that would be Rob Thomas, that's another one of our

92

1 lead fitters .

2 Q. Thank you. Then:

3 "All the measurements were passed back to Harley."

4 And then Mr Berry says this :

5 "Around September/October 2014 Mark and Chris Beta

6 attended the tower to drill preparatory holes in the

7 building, using handheld drills."

8 Then if we go over to the top of the next page

9 {MET00019985/2}, he says:

10 "This was for the windows and cladding to be fitted

11 the entire height of the tower. These were based on the

12 plans that had been delivered to the site and were not

13 done by ourselves."

14 Do you see that there?

15 A. I do.

16 Q. So when he's describing the plans that had been

17 delivered to the site, is it your evidence that what

18 he's describing there is what we were just referring to?

19 A. Off that drawing register, yes.

20 Q. Yes, so it's the drawing register, and it's held in the

21 unit --

22 A. Yes.

23 Q. -- that Osborne Berry have at site?

24 A. Yes, yes.

25 Q. Was Osborne Berry given sufficient opportunity to review

93

1 setting -out drawings before commencing any of its

2 preparatory work on site?

3 A. When I levelled the building up, I left marks on the

4 building so that we could always refer back to those

5 marks, knowing full well what they meant.

6 Q. Yes.

7 A. And we just followed those marks back to the drawings

8 that had been prepared by Harley and worked back off

9 those.

10 Q. I see, yes.

11 Did Osborne Berry ever have any input into the

12 preparation or finalisation of any of the Harley

13 drawings, including the detailed drawings for,

14 for example, the fixings on the project?

15 A. None whatsoever.

16 Q. And did Osborne Berry ever produce any drawings or plans

17 itself --

18 A. No.

19 Q. -- during the course of its work?

20 A. No.

21 Q. So you were always working off the Harley drawings?

22 A. Always working off Harley drawings.

23 Q. Thank you.

24 Now, if we can turn to {RYD00088923}, these are

25 minutes of a meeting. It's a subcontractor progress

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1 meeting, and we can see there in the top left it's dated

2 28 April 2015. We can see that you're present at the

3 meeting. Do you see the list of attendees?

4 A. I do.

5 Q. Present we've got Simon O'Connor from Rydon, other Rydon

6 operatives, Ben Bailey of Harley, and then you for

7 Osborne Berry.

8 If we look on page 2 {RYD00088923/3} of these

9 minutes at item 6.02, there says:

10 "B.B [Ben Bailey] to provide elevations drawings

11 showing progress on a weekly basis to D.O."

12 We think that must be Daniel Osgood of Rydon.

13 A. I would assume so.

14 Q. Then the item below that, 6.03, says:

15 "B.B [Ben Bailey] to issue elevations showing

16 positions of fire break on all elevations to D.O."

17 That's Daniel Osgood.

18 Now, we're going to come back to discuss in detail

19 firebreaks and cavity barriers, but just in terms of the

20 information you were provided with, do you know whether

21 Mr Bailey or Mr Osgood ever showed you elevation

22 drawings of the tower showing the positioning of the

23 firebreaks?

24 A. I had a drawing of the tower --

25 Q. Yes.

95

1 A. -- where the firebreaks were marked in red pen, to

2 confirm where they had to go --

3 Q. Yes.

4 A. -- to make sure the compartmentalising of the building

5 was complete, basically .

6 Q. Yes. You say you had a drawing and it was in red pen

7 showing where the --

8 A. Identifying where they -- what areas they're going to be

9 put in.

10 Q. So had somebody with a pen physically annotated --

11 A. Yes.

12 Q. -- on that drawing?

13 A. Yes.

14 Q. So the red pen --

15 A. Was for fire breaks.

16 Q. Yes, and the red pen was not there originally on the

17 drawing, it was something that somebody put on the

18 drawing?

19 A. Afterwards, afterwards, as far as I can remember.

20 Q. Yes?

21 A. Yes.

22 Q. Do you know who put that red pen on the drawing?

23 A. I do not.

24 Q. You don't?

25 A. No, I was just provided with the drawing.

96

1 Q. Does that mean that you didn't actually ever see
 2 elevation drawings with the cavity barriers shown on the
 3 elevation in drawing form?
 4 A. I probably did, to be honest, most definitely.
 5 Q. But is your evidence that what you were working off on
 6 a day-to-day basis was the one with the red pen?
 7 A. Working off the one with the red pen, and then before
 8 that we did -- because of -- we had a problem where the
 9 firebreak went in respect to -- we had to put an EPDM to
 10 seal the angle brackets --
 11 Q. Yes.
 12 A. -- to stop water leaking down and into the flats.
 13 Q. Yes.
 14 A. You couldn't penetrate the EPDM --
 15 Q. Yes.
 16 A. -- with the firebreak or the insulation, so the EPDM was
 17 put on and then the firebreak was moved upwards to allow
 18 fitting of the firebreak and fitting of the insulation.
 19 Q. When you say the firebreak was moved upwards to allow
 20 the fitting of the firebreak and fitting of the
 21 insulation, do you mean -- is this on the columns we're
 22 talking about?
 23 A. No, this is on the horizontal.
 24 Q. Yes.
 25 A. So we did a sample panel for everybody to come and look

97

1 at.
 2 Q. Yes.
 3 A. And then they agreed that they were happy with that, and
 4 that's where we proceeded from there. So that's where
 5 the firebreaks were set up from, basically.
 6 Q. Does that mean that the positioning of the horizontal
 7 cavity barriers on the tower were slightly higher, rose
 8 up --
 9 A. Yes.
 10 Q. -- from the position that had originally been shown in
 11 the Harley drawings?
 12 A. Yes.
 13 Q. That's really helpful, because I was going to take
 14 you -- and I'll still take you to it -- to a photograph
 15 where we think we see cavity barriers higher than in the
 16 drawings.
 17 A. Yes.
 18 Q. And you're confirming that that was a --
 19 A. Yes.
 20 Q. -- specific change that was agreed on site?
 21 A. Yes.
 22 Q. Who did you have those discussions with about raising up
 23 the cavity barrier?
 24 A. It was either Kevin Lamb or Daniel Anketell-Jones.
 25 Q. Can you recall roughly when? I mean, how far through

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1 the project?
 2 A. Oh, very -- no, early on in the project. Then a sample
 3 panel was completed, I believe I was on the mast climber
 4 at the time, Grahame was on the mast climber, and
 5 several other people, probably eight or ten people, all
 6 came up to have a look at what we had done, and then
 7 that was agreed that that's where it would be and that's
 8 where we worked from, basically.
 9 Q. Yes.
 10 Can you help me with this: can you recall by roughly
 11 how much you raised that cavity barrier?
 12 A. Not a great deal. Measurement-wise, I can't tell you,
 13 but it wasn't a great deal. It was just enough to
 14 getting the fixing in so that we could hold the
 15 insulation in place on the wall without perforating the
 16 barrier below it.
 17 Q. Could it have gone up by as much as a foot?
 18 A. I wouldn't have thought so.
 19 Q. No?
 20 A. I would have thought more like 100-mil.
 21 Q. 100-mil?
 22 A. Yeah.
 23 Q. So 10 centimetres?
 24 A. Yeah, yeah.
 25 Q. Approximately how far from the head of the window was

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1 that cavity barrier then, roughly?
 2 A. I really can't remember.
 3 Q. Okay. I'm going to come to some photographs which might
 4 help us with this in a bit.
 5 A. Yeah, that's fine.
 6 Q. Now, looking at page 6 of your second witness statement,
 7 {OSB00000090/6}, paragraph 9(a) in the top half of the
 8 page, the Inquiry's asked there whether Harley provided
 9 Osborne Berry with a method statement for the
 10 installation work, who provided it, when was it
 11 provided, et cetera, and you have said there you cannot
 12 remember.
 13 Does that remain your evidence, that you can't
 14 remember whether there was a method statement?
 15 A. I had various method statements for various parts of the
 16 work --
 17 Q. Yes.
 18 A. -- basically. I can't remember if it was just for
 19 insulation or cladding or --
 20 Q. I see.
 21 A. But there were method statements going around.
 22 Q. Yes. Let's try and help with that --
 23 A. Ben provided those.
 24 Q. That's Ben Bailey of Harley?
 25 A. Ben Bailey of Harley.

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1 Q. Let's try and help with that. Let's look at
 2 {HAR00010913}. This is a Harley method statement and
 3 the activity it's dealing with is specified at the top
 4 there. It says, "Installation of Cladding System". We
 5 can see at the very bottom of page 1 that this appears
 6 to have been issued on 5 January 2015. Can you see the
 7 date there at the bottom?
 8 A. I do.
 9 Q. You're listed at the top of that page as the site
 10 foreman, we see that there, "Mark Osbourne(sic)".
 11 A. Yes.
 12 Q. And Ben Bailey is there as the site supervisor.
 13 Now, does this help as to whether you saw method
 14 statements like this on the project?
 15 A. I don't remember that particular method statement, no.
 16 Q. Okay.
 17 A. But I did see method statements telling me how things
 18 should be fitted.
 19 Q. Okay.
 20 At page 2 {HAR00010913/2} there is a section headed
 21 "Sequence", at the bottom third of that page. Can you
 22 see there there's a small subheading underlined,
 23 "Sequence"?
 24 A. I do.
 25 Q. What we get is a number of stages that are numbered in

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1 this method statement that seem to be the step-by-step
 2 stages to be followed in terms of installing the
 3 cladding, from putting in supporting timber frame
 4 brackets to setting out; the drilling of holes, item 2;
 5 timbers installed on the centre lines, et cetera,
 6 item 3. And then if we keep going over the page to
 7 page 3 {HAR00010913/3}, and we look at the top of that,
 8 then we have:
 9 "5) The Different coloured Panels will then be
 10 lifted onto the scaffold by two operatives, the panels
 11 will then be held in place ..."
 12 Looking at that, that sequence, can you help us as
 13 to whether the actual method of fixing the cladding did
 14 comply with that sequence?
 15 A. Not at all. For one, there's no timber runners on the
 16 building.
 17 Q. Yes.
 18 A. And for two, the panels were fitted way, way down the
 19 line compared to when the insulation and firebreak was
 20 fitted.
 21 Q. Do you mean that there was a big time gap between when
 22 the --
 23 A. Most definitely.
 24 Q. -- insulation was fitted and the cavity barriers were
 25 fitted, and then a break to then when the cladding

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1 panels were fitted?
 2 A. Correct.
 3 Q. Yes.
 4 Let's turn to another of these method statements.
 5 This, is {RYD00044095}. If we look at this method
 6 statement, it's another Harley method statement, and the
 7 activity here is said to be installing column cladding,
 8 as opposed to the activity previously was -- let me just
 9 remind myself ...
 10 (Pause)
 11 Yes, previously the activity was "Installation of
 12 Cladding System". This one seems to be more specific;
 13 it says, "Installing Column Cladding".
 14 Can you help us as to whether you saw this method
 15 statement? Just to help, it's actually dated a bit
 16 later, it's 22 June 2015. We see that on the bottom --
 17 A. I do.
 18 Q. -- left of this. If we can just check the date at the
 19 bottom left of this method statement.
 20 A. Yeah, I've got that.
 21 Q. Yes. I think you just said you do recall seeing this
 22 one; is that right?
 23 A. I do.
 24 Q. Again, you're listed as the site foreman there. If we
 25 turn to page 2 {RYD00044095/2}, under the heading

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1 "Sequence" at the bottom of that page, we get
 2 a different numbered list. It's a numbered list that's
 3 much longer, it goes on onto the next page. I can show
 4 you that in a moment. We can see again, stage by stage,
 5 what should happen in terms of the sequence of the
 6 column cladding: loading the mast climber with the rails
 7 and brackets; raising the mast climber to working level,
 8 inserting bolts; then lowering the mast climber at 3;
 9 using the setting out, and raising the lower cladding
 10 channel to a correct level; number 5, installing two
 11 pairs of brackets on to the pre-installed fixing stud;
 12 6, repeating this process up the building until the top
 13 floor is reached.
 14 Then if we go over the page {RYD00044095/3}, once
 15 the rails have been installed -- this is item 7 --
 16 operatives travel down the building and install the
 17 intermediate brackets; then 8, operatives will then
 18 remove the bottom M10 dead fixing; then 9:
 19 "When all the brackets have been installed on the
 20 cladding rails, operatives will install the vertical
 21 firebreaks in the same position as the internal party
 22 walls ... making sure that the joints are butted tightly
 23 together and the joints taped with adhesive backed foil
 24 'O' tape."
 25 Then at 10, after that:

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1 "Operatives will then fit the 100mm thick insulation
2 around the brackets and firebreaks, taping joints with
3 a class 0 adhesive foil tape where necessary."
4 Then:
5 "When the cladding channels, firebreaks and
6 insulation has been fitted, operatives will install the
7 hook on panels and secure with a hidden self drilling
8 screw."
9 A. That is correct.
10 Q. Do you see that there?
11 A. That is correct.
12 Q. Now, I've taken you through that slowly because we just
13 want to check, was that the method that you actually
14 followed on site for installing the column cladding?
15 A. The column cladding, yes, but there were pieces left out
16 of it for the tie legs of the mast climbers --
17 Q. Yes.
18 A. -- because Rydons in their infinacy (sic) decided to put
19 the mast climber legs on to the columns, not on to the
20 flat panels.
21 Q. Right.
22 A. So that -- one or two of these would have been left out
23 going up the building wherever a mast climber leg was
24 attached to the building.
25 Q. So you had gaps that you had to then go back --

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1 A. And refill later.
2 Q. -- and refill. And were you going back to fill those
3 gaps when all the rest of it had got to the final stage?
4 A. Correct.
5 Q. Right.
6 A. And the mast climbers were being struck to come down the
7 building, basically. So the mast climbers would be
8 loose when you were actually fitting those panels.
9 Q. I see. So for those areas, you did it all in one go,
10 did you?
11 A. Exactly.
12 Q. Yes. Thank you, that's helpful.
13 Can you recall, you say you think you saw this
14 method statement, would you have been provided that in
15 hard copy or electronically?
16 A. I would presume, knowing me, it would be in hard copy.
17 Q. Yes.
18 A. I do remember this one. This is one of Ben's,
19 definitely.
20 Q. Would that be kept in your site cabin?
21 A. In the site cabin, yeah.
22 Q. Thanks.
23 Was any part of the installation process left to
24 Osborne Berry to determine in practice?
25 A. No.

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1 Q. No?
2 A. No, not at all.
3 Q. It was all strictly regulated by Harley instructions,
4 was it?
5 A. Yes.
6 Q. Was any part of it in fact undertaken based on past
7 experience of other sites? Did you have experience of
8 fitting these panels or firebreaks or the insulation on
9 other sites, and did any of that knowledge that you had
10 acquired on other projects directly carry through to how
11 you did it on this project?
12 A. I would think it did, yes.
13 Q. Can you think of any specific examples of where you
14 might have done something different to what perhaps
15 Harley instructed you to do because you had had previous
16 experience of fitting something?
17 A. Not off the top of my head, no.
18 Q. No, okay.
19 Now, in your first witness statement -- this is at
20 page 3 {OSB00000087/3}, paragraph 4(k), we don't need to
21 turn it up -- you say that Osborne Berry simply
22 installed the materials as directed, and you say
23 something similar in your second statement at page 6
24 {OSB00000090/6}, paragraph 9(b), you say that the
25 sequence of work was dictated by Harley.

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1 Can you just help us, when you are using the words
2 "directed" and "dictated", precisely what you mean by
3 that?
4 A. We were told what part of the building needed to be done
5 at what particular time.
6 Q. Yes.
7 A. I would say probably Harley got that information from
8 Rydons, the main contractor.
9 Q. Yes.
10 A. Because they didn't want you on this elevation today
11 because they were doing something else, and we were
12 moved round the elevations in that respect, basically.
13 Q. Yes. So, in practice, it was always up to Harley where
14 you were working and how you were working?
15 A. Correct.
16 Q. Were you ever provided with any additional instructions
17 on site for how the cladding was fitted beyond those
18 contained in the drawings and the method statements?
19 A. No.
20 Q. I think you might have just referred to perhaps one
21 example of that, which is raising the cavity barriers,
22 the horizontal cavity barriers. Would you agree that
23 that wasn't something that was instructed in the
24 drawings?
25 A. No, that's -- yeah, sorry, that's my fault, yes.

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1 Q. Yes.
 2 A. Yes.
 3 Q. So that wasn't in a drawing or a method statement; it
 4 was agreed on site, was it?
 5 A. That's correct. That's correct.
 6 Q. Are there any other examples you can think of like that,
 7 of in practice where you have to try and fit the
 8 cladding, something needed to change from what was shown
 9 in the drawings?
 10 A. Fixing the cladding rails back to the top bracket. It
 11 was meant to be fixed with a 10-mil deadbolt but it
 12 would have been impossible to get at the deadbolt
 13 because the deadbolt would have been buried behind the
 14 insulation. So it was brought up that it could be fixed
 15 with Tek screws.
 16 Q. Yes.
 17 A. Which are self-drilling, self-threading screws, and that
 18 was brought up and passed back to Daniel Anketell-Jones
 19 for approval, basically.
 20 Q. Yes.
 21 A. And that came back as being approved.
 22 Q. Yes, and when you say --
 23 A. Probably --
 24 Q. Sorry.
 25 A. Sorry to interrupt.

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1 Q. No, no, go --
 2 A. There were probably various other little things, but
 3 remembering them --
 4 Q. Yes.
 5 A. -- is very difficult --
 6 Q. No, I understand.
 7 A. -- this far down the line.
 8 Q. When you say that was passed back to
 9 Daniel Anketell-Jones, would you actually speak to
 10 Daniel Anketell-Jones about something like that or was
 11 it done by email?
 12 A. I would have spoke to him about that.
 13 Q. You would have spoke to him?
 14 A. Yeah.
 15 Q. And just picked up the phone and given him a call?
 16 A. Just give him a ring, yeah, basically.
 17 Q. Again, when the cavity barriers were slightly raised,
 18 I think you said before that that would have been
 19 discussed with either Kevin Lamb or
 20 Daniel Anketell-Jones.
 21 A. That would have been either of those. If Kevin was
 22 on site, I would have discussed it with him when he was
 23 on site. If he wasn't, I would have discussed it over
 24 the phone with Daniel, basically.
 25 MS GRANGE: Okay, that's helpful.

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1 Mr Chairman, I'm about to move to a different topic,
 2 so I think that might be a good time for the lunch
 3 break. Thank you.
 4 SIR MARTIN MOORE-BICK: Yes, okay.
 5 Mr Osborne, we are going to have a break now so we
 6 can all get some lunch. We will resume at 2 o'clock,
 7 please.
 8 THE WITNESS: That's fine.
 9 SIR MARTIN MOORE-BICK: While you're out of the room, I have
 10 to ask you, please, don't talk to anyone about your
 11 evidence or anything to do with it.
 12 THE WITNESS: That's fine, no problem.
 13 SIR MARTIN MOORE-BICK: All right? Thank you. Would you
 14 like to go with the usher, then, please.
 15 (Pause)
 16 All right. 2 o'clock, then, please.
 17 MS GRANGE: Thanks.
 18 SIR MARTIN MOORE-BICK: Thank you.
 19 (1.00 pm)
 20 (The short adjournment)
 21 (2.00 pm)
 22 SIR MARTIN MOORE-BICK: Right, Mr Osborne, ready to carry
 23 on?
 24 THE WITNESS: I'm ready, thank you very much.
 25 SIR MARTIN MOORE-BICK: Thank you very much.

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1 Yes, Ms Grange.
 2 MS GRANGE: Yes, thank you, Mr Chairman.
 3 Mr Osborne, just to pick up on a couple of points
 4 arising from your evidence this morning.
 5 You talked about the red pen drawings that had the
 6 cavity barriers marked on them and where you were to put
 7 the cavity barriers.
 8 A. Yes.
 9 Q. Was that a drawing of a bay, just one bay of
 10 Grenfell Tower?
 11 A. No, it was a side elevation of the building.
 12 Q. A side elevation.
 13 A. Complete side elevation of the building.
 14 Q. Yes, okay, and they were marked from top to bottom on
 15 that, were they?
 16 A. Correct.
 17 Q. Great, thank you.
 18 So I now want to ask you some questions about the
 19 choice of materials and the compliance of those
 20 materials. Just turning to page 2 of your first witness
 21 statement, this is {OSB00000087/2}, at paragraph 4(d)
 22 you, at the top of that page, are asked the question:
 23 "Was the exterior of the building ... compliant with
 24 relevant building regulations, fire regulations ..."
 25 Et cetera.

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1 You say this :
 2 "I do not know the answer to this question.
 3 I worked on the basis that all materials supplied to us
 4 for installation by Harley were compliant."
 5 Did you ever have any discussions about issues of
 6 compliance with Building Regulations with anybody at
 7 Harley or any other person on the project?
 8 A. Not at all .
 9 Q. Did you ever have any discussions with anyone on the
 10 project, including on site, about the performance of the
 11 materials you were installing and specifically their
 12 fire performance?
 13 A. I don't think so.
 14 Q. No, okay.
 15 A. From memory, I would say no.
 16 Q. Did you yourself ever have reason to consider the fire
 17 performance of the products that you were installing?
 18 A. Not at the time. With hindsight, yes, now I do.
 19 Q. Had you ever heard of the term "class 0" or "national
 20 class 0" at the time?
 21 A. Yes, I have.
 22 Q. In what context? What did you think that meant?
 23 A. I thought that was a non-burnable product.
 24 Q. Did you ever have any discussions with anyone or did you
 25 ever come across the term "class 0" on the Grenfell

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1 project?
 2 A. I believe the insulation was supposed to be a class 0.
 3 Q. Did you ever discuss that specifically with anybody?
 4 A. No. Not at all .
 5 Q. But if I had asked you at the time about the fire
 6 properties of the insulation, would you have said, "It's
 7 a class 0 product"?
 8 A. Probably not.
 9 Q. No, okay.
 10 A. Probably not.
 11 Q. But that was your belief, was it?
 12 A. That's my belief .
 13 Q. Yes.
 14 Now, the aluminium composite material panels, if we
 15 can go back to the bill of materials that you were sent,
 16 this is {OSB000000051/2}, and if we look on that page,
 17 what we see under each of the headings there is -- well,
 18 we see the headings are "Zinc Rainscreen to columns",
 19 "Zinc Rainscreen to crown screens", "Zinc Rainscreen to
 20 walls", and then underneath each of those headings we
 21 see it says "Proteus Rainscreen system (KME)".
 22 A. That's correct.
 23 Q. There's reference to "H92" in brackets. We know that's
 24 a reference to the cladding section of the
 25 NBS specification on the project.

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1 Now, we know from the documents and from speaking to
 2 other witnesses that, by August 2014, a decision had
 3 been made to seek planning approval to change from zinc
 4 to ACM, aluminium cladding material.
 5 Were you ever told that ACM panels were going to be
 6 used in place of zinc panels?
 7 A. No, we assumed it was ACM panels from day one, as far as
 8 I can remember.
 9 Q. So did you ever look at this document? I mean, you said
 10 you were involved with Mr Berry in drawing up the price
 11 in response to this. Did you notice --
 12 A. I didn't tie that in, that Proteus rainscreen system,
 13 because by that time I'm sure that we were under the
 14 impression that it was an ACM panel, not a zinc panel.
 15 Q. I see. So is it your evidence that you didn't notice
 16 that it said Proteus rainscreen system?
 17 A. That's correct.
 18 Q. And is it also your evidence that you think, by the time
 19 you were pricing the project, you were aware it was ACM?
 20 A. I think it could be, yes.
 21 Q. But you can't recall who might have told you that?
 22 A. I can't recall for sure.
 23 Q. Sorry. I think we're having a tendency to speak --
 24 you're speaking quite quickly sometimes in response to
 25 my question, and I know it's my fault too, we have to

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1 try and separate them out so the transcriber can hear
 2 nice and clearly .
 3 So you knew at the time you were installing these
 4 panels, did you, that they were ACM, aluminium panels,
 5 and not zinc rainscreen panels?
 6 A. I knew they weren't zinc, but I couldn't give you
 7 a guarantee I knew what it was going to be. All I knew
 8 it was going to be an aluminium panel, basically .
 9 Q. Did you know that they were called Reynobond panels and
 10 that they had been manufactured by Alcoa or Arconic?
 11 A. At the time, no.
 12 Q. Did they have any kind of markings on them which would
 13 have told you --
 14 A. Oh, when they arrived on site, most definitely. There
 15 was low tack tape across the panels with the name
 16 "Reynobond" written on them in bold letters .
 17 Q. Yes. Can we turn to a document, {BBA00000047}. This is
 18 the BBA certificate for the Reynobond ACM panels that
 19 were installed on the tower. It's first issued in
 20 January 2008, we can see that from the bottom of the
 21 page in the pale blue box.
 22 Have you ever seen this document before?
 23 A. Not at all .
 24 Q. Would you ever, as an installer, come to look at
 25 something like a BBA certificate on a project?

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1 A. No, not that I can remember. Not that I can remember.
 2 You would just be told what you're going to fit,
 3 basically.
 4 Q. So can we take it you didn't look at this at any time
 5 during your involvement on the Grenfell project?
 6 A. That's correct.
 7 Q. Now, if we turn on to page 3 {BBA0000047/3} of this
 8 certificate, there is a section headed "General" at the
 9 top of the page, and in the third paragraph down it says
 10 this:
 11 "It is important for designers, planners,
 12 contractors and/or installers to ensure that the
 13 installation of the cladding is in accordance with the
 14 Certificate holder's instructions and the information
 15 given in this Certificate."
 16 Do you see that there?
 17 A. I do.
 18 Q. Did you know at the time you were fitting the panels
 19 that you had to ensure that the installation was in
 20 accordance with the certificate holder's instructions,
 21 and information in the BBA certificate?
 22 A. I did not.
 23 Q. Were you ever provided with any separate instructions
 24 from Alcoa or Arconic, the manufacturer of the panels,
 25 which had to be followed by those installing the

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1 cladding?
 2 A. Not at all.
 3 Q. Did you ever ask to see any information from the
 4 manufacturer of the panels to check that the
 5 installation was being carried out in line with its
 6 requirements?
 7 A. No.
 8 Q. And why not? Was that not information that you needed
 9 or ought to check?
 10 A. I took my instructions from Harley. I would have
 11 assumed they would have got somebody down if it was
 12 necessary to actually check it.
 13 Q. Does that mean that it wasn't usual for you to check
 14 manufacturers' instructions before installing materials
 15 in a rainscreen cladding system?
 16 A. That's correct.
 17 Q. Then if we turn on to page 6 {BBA0000047/6} of this
 18 certificate, section 10, it also says there in
 19 part 10.2, in the middle of that page:
 20 "Installers must be trained and approved by the
 21 Certificate holder who can provide technical assistance
 22 at the design stage and at the start of the
 23 installation."
 24 Now, was Osborne Berry trained at any stage by Alcoa
 25 or Arconic?

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1 A. Not at all.
 2 Q. Was Osborne Berry at any stage approved by Alcoa or
 3 Arconic as an installer of its panels?
 4 A. No.
 5 Q. Were you aware when you were fitting the panels on the
 6 building that the fixing for the panels deviated from
 7 the standard Arconic detail for cassette systems hung on
 8 bolts?
 9 A. No.
 10 Q. You weren't aware of that?
 11 A. Weren't aware of that.
 12 Q. What did you think was inside the core of the panels
 13 when you were installing them?
 14 A. Some kind of plastic membrane.
 15 Q. So you did notice that they had a core?
 16 A. Yes, most definitely.
 17 Q. Is that all you knew about it, that it was some kind of
 18 plastic membrane?
 19 A. Correct.
 20 Q. Did you know it was polyethylene or PE?
 21 A. I think it was probably on the panels, on the actual low
 22 tack tape on the panels, I think it could have had "PE"
 23 written on there. But I can't be sure now; it was
 24 a while back.
 25 Q. Had you come across polyethylene or PE previous to the

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1 Grenfell project?
 2 A. We used the same panel on Little Venice, but from
 3 a different manufacturer.
 4 Q. Did you know anything about the fire performance of PE
 5 at the time you were installing the panels?
 6 A. Not at the time I installed it, no.
 7 Q. Did you ever have any discussions with anyone during the
 8 project about the fire performance of that core?
 9 A. Not that I can remember.
 10 Q. Were you aware that the polyethylene core of the panel
 11 was exposed around its perimeter when you were
 12 installing it?
 13 A. Yes.
 14 Q. Again, did you ever discuss that with Harley or any
 15 other party on the project?
 16 A. No.
 17 Q. Now, if we can go to the transcript of Mr Hughes'
 18 evidence of Rydon, if we can look at {Day27/54:7}. So
 19 Mr Hughes was asked:
 20 "Question: Were you aware at the time of working on
 21 the project that if a fire occurred in the building
 22 which led to significant flames being ejected from the
 23 window, the cladding panels would likely fail because
 24 they would melt and fall off the building? Was that
 25 something that you were ever made aware of?"

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1 "Answer: I had one conversation with Taff about it,
 2 but my understanding or what I got in my head was the
 3 actual fixings, the lug system where you hooked the
 4 panel on, that little bit there would fail just through
 5 heat, in the same way that I was told at Chalcots, they
 6 warped. So I think it was more of a warping that
 7 I expected or the plastic might lose a little bit of
 8 strength.
 9 "Question: When you say you had one conversation
 10 with Taff about it --
 11 "Answer: Yes.
 12 "Question: -- were you then just describing the
 13 conversation you had with Taff?
 14 "Answer: Yes, that's it, sorry, yes."
 15 Now, do you see that there?
 16 A. I do. I had so many conversations with Dave, I can't
 17 remember if I did say this or not, but I wouldn't deny
 18 it, because I do not know or cannot remember.
 19 Q. So you can't recall whether you had any conversations
 20 with him about what might happen to the panels if
 21 significant flames were ejected from the window?
 22 A. Not off the top of my head, no.
 23 Q. Okay.
 24 Can we just look over at the next page, sorry,
 25 I just want to check I have picked up everything I need

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1 to.
 2 (Pause)
 3 No, that's it. Yes, thank you.
 4 Now, the crown. I now want to just ask you some
 5 questions about the architectural crown of the building.
 6 If we look at your second witness statement at
 7 page 12, this is {OSB00000090/12}, and I want to look at
 8 what you say at paragraph 21(a) at the top of that page.
 9 You're asked:
 10 "Please explain the work involved in 'making top
 11 crown angle panels'. Please give a description of the
 12 scope of Osborne Berry's work in this respect."
 13 Then you say this:
 14 "Harley supplied the top crown panels. These panels
 15 arrived in flat pack. They needed to be angled by
 16 bending and riveting together before installing onto the
 17 building."
 18 Now, I just want to ask you a bit more about that
 19 work. Was that work, in terms of bending and riveting
 20 these flat panels together, done by Osborne Berry?
 21 A. It was.
 22 Q. And was that done according to instructions from Harley?
 23 A. It was.
 24 Q. And who gave those instructions?
 25 A. Erm ... it's a little bit more detailed than that. The

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1 panels would come from the manufacturer --
 2 Q. Yes.
 3 A. -- with all the grooving in them. So the panel was
 4 3-mil thick. There would be a groove put in it which
 5 you then folded together and then riveted the edges
 6 together, basically, to hold it together. So the panel
 7 would come from the manufacturer pre-manufactured, you
 8 just folded it up into this panel.
 9 Because of the size of the panels, you would have
 10 never moved them up the building if you didn't have them
 11 in flat pack. They would have been too large to carry
 12 on the mast climber. So you literally took them up
 13 them, put them in place, bent them round and then
 14 riveted them to their rails where they needed to be.
 15 Q. I see, yes. So that's to create these C-shaped --
 16 A. To create the crown --
 17 Q. -- channels on the building; is that right?
 18 A. Yes, yes, yes. They all just fold in and fold round,
 19 and then your rails are up in the building, straight up
 20 the building, you rivet them to the rails, that holds
 21 them in place then.
 22 Q. Yes, that's helpful.
 23 Was that work done by reference to any drawings or
 24 any other installation guidance?
 25 A. It would have been done to a drawing, definitely. There

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1 would have been a drawing for it somewhere.
 2 Q. Do you know whether any records were kept of the way in
 3 which those panels were bent and riveted?
 4 A. Not that I know to, no, you would have to ask Harley for
 5 that one.
 6 Q. Then if we look at the next paragraph down on that page,
 7 at 21(b), you are asked:
 8 "Please explain the work involved in 'Making infill
 9 panels for back of crown panels on roof area ...'
 10 Please give a description of the scope of
 11 Osborne Berry's work in this respect."
 12 And you answer:
 13 "Osborne Berry installed the top crown panels as
 14 specified by Harley. However the building instructor
 15 did not like the gaps at the back of the panels where
 16 they came down to the parapet and therefore
 17 Osborne Berry were instructed by Harley to infill the
 18 gaps with cladding panels."
 19 Just to ask you a few things about that: who was the
 20 building instructor that you are referring to there?
 21 A. That would be the clerk of the works.
 22 Q. Would that be Jon White?
 23 A. Yes.
 24 Q. And you have a clear recollection that it was Jon White,
 25 do you?

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1 A. I have a recollection it was Jon White.
 2 Q. Can you just help us as to exactly what he wasn't happy
 3 with about the way these panels --
 4 A. Having big gaps aesthetically didn't look pretty.
 5 Q. Can you just help us, where were those gaps?
 6 A. If you were on the roof looking out --
 7 Q. Yes.
 8 A. -- you could see the gaps between the top panels and the
 9 concrete façade, so he wanted the concrete façade filled
 10 up so that it covered the gap between the panel and the
 11 concrete façade, so you couldn't see in to the panel,
 12 basically.
 13 Q. I see. So where exactly were the gaps? Were they in
 14 each rivet?
 15 A. In each corner.
 16 Q. In each corner?
 17 A. Around each frame of the panel. It's hard to explain.
 18 If you have got a panel shaped like that, there was
 19 a gap appeared like that around it and he wanted those
 20 gaps filled in, basically, so that you couldn't see in
 21 to the back of the panel.
 22 Q. Were those panels infilled then with more ACM?
 23 A. They were infilled with more ACM as I remember.
 24 Q. So more ACM was applied to the arrangement --
 25 A. Yes.

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1 Q. -- to fill in the gaps at the top of the panels, where
 2 they tapered off at the top?
 3 A. Yes, correct. That's correct.
 4 Q. Who came up with that solution on site?
 5 A. I cannot remember, but I would think it's probably
 6 Kevin Lamb.
 7 Q. Right.
 8 Do you know whether any other parties were aware of
 9 that change, other than Osborne Berry and Harley? Do
 10 you know whether that solution was ever discussed with
 11 Studio E?
 12 A. I wouldn't know that, but I would be sure it was
 13 discussed with Rydons.
 14 Q. Okay. Can you recall when this was going on on the
 15 project?
 16 A. I can't, it's --
 17 Q. Approximately?
 18 A. It's toward the end of the project.
 19 Q. Yes.
 20 A. Getting very close to the project being finished,
 21 basically. Within the last six months of the project.
 22 Q. So probably sometime in 2016?
 23 A. Yes. Oh, yes, definitely.
 24 Q. Thank you.
 25 Now, turning to the insulation, were you aware of

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1 what the different types of insulation boards were that
 2 were being used between levels 4 and 23 on the spandrels
 3 and the columns?
 4 A. No, no.
 5 Q. Did you know who had manufactured that insulation and
 6 what product it was?
 7 A. I did know it was Celotex, yes.
 8 Q. How did you know it was Celotex?
 9 A. It was written on the boards.
 10 Q. Was there a branding on all of the Celotex boards? We
 11 have been told by some witnesses that some of the
 12 Celotex boards were unbranded.
 13 A. Could well be. That doesn't surprise me. That could
 14 well be.
 15 Q. Yes.
 16 A. Could well be.
 17 Q. Is it common that sometimes that kind of boarding isn't
 18 branded?
 19 A. Yes, yes, yes, yes. I have seen it before.
 20 Q. Were you aware that another product was also used,
 21 a Kingspan K15 product?
 22 A. I was.
 23 Q. When did you become aware of that, can you help us?
 24 A. When it arrived on site.
 25 Q. Yes.

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1 A. And I believe the reason that it was used was because
 2 Celotex couldn't produce enough to keep us going, so
 3 Kingspan was bought in its place, basically.
 4 Q. Can you help us as to precisely where on the tower that
 5 Kingspan product went?
 6 A. From my memory, I think most of it went on the north
 7 elevation.
 8 Q. Right.
 9 A. Above what I call the grid, it's like a big metal deck
 10 fitted between the floor and the first floor. Above
 11 that, I believe that's where the Kingspan was fitted.
 12 Q. Was it ever fitted above level 4?
 13 A. That I cannot remember.
 14 Q. Can we just look at a photograph. If we go to
 15 {RYD00051704}. This photograph, it's not hugely clear,
 16 but basically, if we look at the third level above the
 17 mast climber, we think we can see some Kingspan
 18 branding.
 19 A. You're right, you can.
 20 Q. Yes, on the insulation. So we can see where the white
 21 window infill panels are --
 22 A. Yeah.
 23 Q. -- what's above and below those, that's the ACM panels,
 24 isn't it?
 25 A. That's the Reynobond panels.

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1 Q. Yes. But then we can see in a couple of locations above
 2 that mast climber that the insulation has got -- and
 3 I think you can see it -- like a lion.
 4 A. Yes, I think that's correct.
 5 Q. And with Kingspan across it.
 6 A. I think you're right.
 7 Q. We think this is either the east face or the west face
 8 because of the number of columns that we're seeing in
 9 the building.
 10 A. Can you take me down to the ground floor of the building
 11 again by any chance?
 12 Q. We can pan out as far as this photograph goes.
 13 A. Yes, that will do. That is the east face of the
 14 building.
 15 Q. Right, thank you. That's helpful.
 16 Did you know at the time that Celotex was
 17 a polyisocyanurate, PIR, insulation board and Kingspan
 18 was a phenolic insulation board?
 19 A. I didn't, no.
 20 Q. No?
 21 A. No.
 22 Q. Did you know that both of these products were
 23 combustible insulation boards?
 24 A. At the time, no.
 25 Q. Had you ever used a product called Celotex FR5000 before

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1 on other projects? Had you ever come across that,
 2 FR5000?
 3 A. I have a feeling we might have used it on
 4 Commercial Road.
 5 Q. Right. Okay.
 6 And what about K15? Had you ever used Kingspan K15
 7 on other high-rise buildings?
 8 A. I've never used K15 anywhere before in my life. This is
 9 the first time we used K15.
 10 Q. Right, okay.
 11 Can you recall, how long was it into the project
 12 that you were first asked to be installing the Kingspan
 13 insulation instead of the Celotex?
 14 A. Probably late 2015 --
 15 Q. Yes.
 16 A. -- early 2016. I would say late 2015 more likely.
 17 Q. Were there several batches of Kingspan that were swapped
 18 in or only one, to your knowledge?
 19 A. I personally think there was only one load bought in.
 20 Q. Okay.
 21 At any point on the project did you come to look at
 22 the Celotex or Kingspan brochures regarding guidance on
 23 installation?
 24 A. Not at all.
 25 Q. Were you aware that the Celotex product you were

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1 installing was a new product called RS5000?
 2 A. No.
 3 Q. So you didn't know it was a new product at all?
 4 A. Not at all.
 5 Q. Okay.
 6 So I now want to move to cavity barriers and ask you
 7 some more detailed questions about the cavity barriers.
 8 If we can start by looking at page 7 of your first
 9 witness statement, that's {OSB00000087/7}, and I want to
 10 look at paragraph 11. The question is asked:
 11 "What training did Osborne Berry give to those
 12 installing the façade and windows, in particular with
 13 regard to fitting cavity barriers?"
 14 Then you say this:
 15 "On-site training was provided to those who were
 16 employed to assist Osborne Berry in the installation
 17 process. Osborne Berry had no involvement in relation
 18 to the fitting of cavity barriers."
 19 A. That was a mistake by me. I don't call them
 20 cavity barriers, I call them firebreaks.
 21 Q. Right, I see.
 22 A. And that was a total mistake by me.
 23 Q. Yes, so you agree that you were involved --
 24 A. Yes, we definitely fit cavity barriers.
 25 Q. -- in fitting cavity barriers?

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1 A. As I say, I've always called them firebreaks, always
 2 known them as firebreaks.
 3 Q. Yes, okay.
 4 Now, if we can go to Osborne Berry's position
 5 statement, and look at page 1, this is {OSB000000084},
 6 and I want to pick it up in paragraph 8 at the bottom of
 7 the page. This position statement gives a summary of
 8 the installation process and goes through the stages.
 9 If we go over on to page 2 {OSB000000084/2} at (ix),
 10 three up from the bottom, we can see it says there:
 11 "Vertical and horizontal and fire breaks were
 12 installed as per elevation drawing."
 13 Now, where you're referring there to firebreaks, is
 14 that what we know as cavity barriers?
 15 A. That's what you know as cavity barriers, yes.
 16 Q. Yes.
 17 A. Yes.
 18 Q. Just to be clear, the reason why you don't describe them
 19 as cavity barriers, is that because you have always
 20 known them as firebreaks?
 21 A. Always known them as firebreaks.
 22 Q. Yes.
 23 A. Ever since I've done the job, they've always been called
 24 firebreaks.
 25 Q. What if you were doing firestopping, properly so-called,

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1 so firestopping to take, say, a compartment floor
 2 internally out to a wall?
 3 A. That would be a fully sealed fire system.
 4 Q. Right, I see.
 5 A. Whereas the cavity barriers have a gap between them with
 6 an intumescent strip --
 7 Q. Yes.
 8 A. -- to expand, take up the gap.
 9 Q. Yes, and you know that as firebreaks?
 10 A. Yes, yes.
 11 Q. Now, we looked at those minutes of that subcontractor
 12 meeting in April 2015 where it said that Ben Bailey of
 13 Harley was to issue elevations showing the position of
 14 firebreaks. Let's just look at that for a moment. This
 15 is {RYD00088923/3}. Look at item 9.01. Here it says:
 16 "Windows and firebreaks being fitted to the North,
 17 East and West elevations."
 18 A. Yes.
 19 Q. Now, do you think that's right, that in April 2015,
 20 installation of firebreaks to the north, east and west
 21 elevations had commenced?
 22 A. I would think very much so.
 23 Q. Then looking at item 6.03, and we saw this earlier, we
 24 see there:
 25 "B.B [Ben Bailey] to issue elevations showing

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1 positions of fire break on all elevations to
 2 [Daniel Osgood]."
 3 Can you help us as to why, if the installation of
 4 the cavity barriers had commenced, we are seeing only at
 5 this point that Ben Bailey is issuing elevations showing
 6 the positions of firebreaks on all elevations?
 7 A. I cannot answer that question.
 8 Q. Yes.
 9 A. But I would say drawings for firebreaks were well in
 10 advance of that, because we'd done the sample panel way
 11 prior to that.
 12 Q. Yes.
 13 A. That's what I thought everything was working off, or
 14 I was instructed, "That's how you're going to proceed",
 15 basically.
 16 Q. When you say, "we'd done the sample panel well in
 17 advance of that", can you explain what you're referring
 18 to there?
 19 A. We did a panel on the north elevation, 16th floor,
 20 between 15 and 16, we actually did a mock-up panel. We
 21 fitted a window into the actual flat.
 22 Q. Yes.
 23 A. We fitted the insulation onto the wall, we fitted the
 24 firebreak on the wall, for inspection by everybody due
 25 to what I was saying with regard to the EPDM barrier.

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1 Q. Can you help us as to when you did that mock-up?
 2 A. Memory for me, no, but my business partner would
 3 probably know that quite well.
 4 Q. Great, we can ask him.
 5 A. Yeah.
 6 Q. Okay.
 7 So you already had drawings, did you, showing the
 8 positions of cavity barriers by this time?
 9 A. Yes.
 10 Q. Were those the red-line drawings --
 11 A. They were the red-line drawings.
 12 Q. -- you were talking about?
 13 A. Yes.
 14 Q. Now, if we look back now to the schedule of quantities,
 15 the bill of quantities that we looked at before,
 16 {OSB000000051/2}, under the heading "Zinc Rainscreen to
 17 columns" at the top of that page, we can see there we've
 18 got "Vertical fire stops: 362 m", do you see that, one
 19 line up from the bottom?
 20 A. I do, I do.
 21 Q. Then a little bit further down the page under "Zinc
 22 Rainscreen to walls", we have a reference to horizontal
 23 firestops. Do you see that, just at the bottom of that
 24 page?
 25 A. I do, yes.

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1 Q. Yes, and a quantity is given.
 2 Now, what was your understanding of what these items
 3 were when you were pricing this up?
 4 A. The horizontal firestops were the firestops that had the
 5 intumescent strip on them which expanded. The vertical
 6 firestops sealed up to the back of the panel. So there
 7 was no air gap.
 8 Q. And did you understand that they were two different
 9 products?
 10 A. As for different products, the main material is the same
 11 but one has an intumescent strip on it.
 12 Q. And one doesn't?
 13 A. And one doesn't.
 14 Q. And did you understand that it was the horizontal
 15 cavity barrier that had the intumescent strip?
 16 A. Correct, I did.
 17 Q. And did you understand that vertical cavity barriers are
 18 solid blocks of inert material such as stone wool that
 19 sit in the vertical position?
 20 Sorry, what was your answer?
 21 A. Yes, sorry.
 22 Q. Thank you.
 23 Now, if we can just look at the NBS specification,
 24 this is {SEA00000169}. This is the architect's
 25 NBS specification that was part of the employer's

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1 requirements for Rydon and their work. Did you ever see
2 this document or indeed any extracts from it, do you
3 think, when you were on the project?

4 A. Not at all.

5 Q. If we look at page 246 {SEA00000169/246} within this
6 document, here we can see that there's a provision for
7 ventilated cavity barriers. In this spec it is said
8 that the manufacturer was something called Downer
9 Cladding Systems, and then we can see for the product
10 reference it says:

11 "Lamatherm CW-RSH60 (horizontal), Lamatherm CW-RSV60
12 (vertical)."

13 Do you see that there?

14 A. I do.

15 Q. If we can turn then to the Harley specification of
16 products to be used on the refurbishment, {HAR00008991}.
17 These are the Harley specification notes that we now
18 know were drawn up by Kevin Lamb, and which set out in
19 more detail the specific products that were to be used
20 in the external wall.

21 Did you ever see this set of notes on the project?

22 A. Not as I can remember, no.

23 Q. Okay.

24 Does that mean that the only formal information you
25 had about the products which were to be used came either

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1 from the drawings that you saw on site or the cost
2 schedule, the bill of quantities, that we saw
3 previously?

4 A. It would have come from the drawings I'd seen on site.

5 Q. Yes. So you would look to those drawings to tell you
6 what the products were, would you?

7 A. Yes. You get a little box in the top right-hand
8 corner --

9 Q. Yes.

10 A. -- telling you what products you were using, basically.

11 Q. Right, I see.

12 Now, we can see on the right-hand side of this, in
13 the right-hand column, about halfway down, for the
14 refurb zones, we've got "Fire breaks - new build zones",
15 then "Fire breaks - refurb zones", and we can see that
16 two products are specified: horizontal Siderise
17 Lamatherm RH25G 90/30 ventilated breaks, and then
18 vertical Siderise Lamatherm RVG 90/30 full fill
19 non-ventilated breaks.

20 So, just to be clear, did you appreciate at the time
21 that the horizontal and vertical cavity barriers were
22 different products with different specifications?

23 A. I did.

24 Q. Did you appreciate that the vertical were described as
25 full fill non-ventilated breaks?

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1 A. I did.

2 Q. And that they had different installation requirements?

3 A. I was informed how to install them, yes.

4 Q. Yes.

5 Now, if we can turn to {SIL00000230}, this is some
6 of the Siderise marketing material for those
7 cavity barriers. This is actually from October 2015,
8 this particular piece of marketing material.

9 Did you ever see this or anything similar at the
10 time, anything from Siderise, the manufacturer,
11 explaining how the cavity barriers were to be fitted?

12 A. No.

13 Q. Then if we can also pull up {SIL00000227}. Again, this
14 is more manufacturers' information, including some
15 installation guidance for cavity barriers for rainscreen
16 systems. This time it's from November 2013. Do you
17 remember seeing anything like that on the project?

18 A. Not at all.

19 Q. Did you ever ask to see any manufacturers' guidance or
20 notes for the installation of the cavity barriers?

21 A. I did not.

22 Q. And why not?

23 A. Because I'd done it on other jobs before and I'd seen
24 information as I'd gone along the line and been told
25 different things of how to do it. I just carried on

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1 assuming it was the same. And looking at what I'm
2 seeing here, it is no different to what was done on the
3 tower.

4 Q. Had you had experience of installing Siderise
5 cavity barriers before on other projects?

6 A. Not that I can remember. Not that I can remember.

7 Q. So did you not ever think it was important, if you were
8 installing a new cavity barrier product, to check the
9 manufacturer's instructions for how to install each
10 product?

11 A. I do now, but I didn't at the time.

12 Q. Okay, thank you.

13 Now, if we look at page 2 {SIL00000227/2} of this
14 guidance, we can see there's a helpful explanation on
15 the top right of this page about the difference between
16 horizontal and vertical cavity barriers. I just want to
17 note this.

18 So it says on the right-hand side at the very top:

19 "SIDERISE cavity barriers for rainscreen cladding -
20 horizontal incorporates a continuous bonded intumescent
21 strip to the leading edge and encapsulated in a weather
22 resistant polymer film. In the event of exposure to
23 fire, this expands and fully seals the designed
24 ventilation gap formed at the time of installation
25 between barrier and the rear of the cladding."

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1 You see that?
2 A. I do.
3 Q. Again, was that your understanding of how the
4 cavity barrier would operate in the event of exposure to
5 fire?
6 A. That is correct.
7 Q. Then immediately underneath, we've got:
8 "SIDERISE cavity barriers for rainscreen cladding -
9 vertical are specifically intended to full fill the
10 void. As a full fill barrier system, the integral
11 intumescent strip is not required. The front edge is
12 finished as standard in a plain aluminium foil. This
13 product is available with a factory applied DPC
14 pre-bonded to the surface."
15 A. I do.
16 Q. Can you see that?
17 A. I do.
18 Q. Again, did you understand at the time that Harley's
19 intention was to install full fill vertical
20 cavity barriers with no intumescent strip?
21 A. I did.
22 Q. Did you ever look at anything on the Siderise website,
23 for example any videos or other explanations on their
24 website, about how to fit the Siderise cavity barriers
25 correctly?

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1 A. I did not.
2 Q. If we can look at page 6 {SIL00000227/6} of this
3 document, it has some installation recommendations
4 there, we can see at the top. We can see that for the
5 vertical cavity barrier, in the second paragraph it
6 says:
7 "This cavity barrier is fitted vertically under
8 compression, completely filling the void. The product
9 is installed with the plain mineral fibre edge
10 positioned against the structural wall."
11 Can you see that there?
12 A. I can.
13 Q. Can you help us, were you aware at the time that the
14 vertical cavity barrier had to be fitted under
15 compression?
16 A. With the system we were using, to actually put it under
17 total compression would have been an impossibility.
18 Because of the hook-on system, the way the panel went
19 on, the panel would just move away from the barrier
20 anyway. The barrier just had to be very tight to the
21 firebreak, that's all you could do basically.
22 Q. Right.
23 Did you ever have any discussions with anyone
24 on site about the fitting of vertical cavity barriers
25 and whether or not they could be fitted under

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1 compression or what was practicable on site?
2 A. No, I did not.
3 Q. Did Harley ever say to you, "Well, these barriers we're
4 told from Siderise need to be fitted under compression,
5 we need to find a solution"? Did anyone from Harley
6 raise that with you?
7 A. No.
8 Q. If we just look at Mr Ben Bailey's witness statement for
9 a moment, this is {HAR00010060/9}, and I want to look at
10 paragraph 27. If we can look at the final sentence of
11 paragraph 27 -- actually, let's just pick it up
12 a sentence before that. He says, six lines up, this:
13 "Due to the significant lean of the building, cavity
14 barriers intended for the columns were ordered oversized
15 after Taff had taken on site measurements which
16 identified this issue. It was decided that cavity
17 barriers with the largest dimension should be ordered so
18 they could then be measured, using a panel template, and
19 trimmed to size on site, in each location, by
20 Osborne Berry and their installers."
21 Now, can you just help us as to whether that was
22 your understanding of what happened?
23 A. That was what happened, basically.
24 Q. And can you help us with precisely what occurred then?
25 He says it was decided that cavity barriers with the

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1 largest dimension should be ordered. What does that
2 mean, dimension in terms of width, in terms of breadth?
3 A. Because the columns moved up the building like, for
4 instance, into a spiral --
5 Q. Yes.
6 A. -- the gap at the bottom was probably 280-mil from wall
7 to face panel, and at the top was 150-mil from wall to
8 face panel. So different depths were made. Not
9 different widths, just different depths --
10 Q. Yes.
11 A. -- and they would be cut to suit to a template that
12 would be hooked on to the rainscreen rail system.
13 Q. I see.
14 A. Then all of it would be trimmed to that template,
15 basically.
16 Q. Does that mean you needed a thicker barrier in the
17 vertical position as you went up the tower?
18 A. It would have been an ideal way of doing it, but the
19 same thickness was ordered all the way up so it covered
20 every eventuality, and it was cut down, basically, by
21 the fitters on site.
22 Q. I see. Does that mean at the lower levels the barrier
23 would have been cut down because the gap was smaller?
24 A. Exactly.
25 Q. But at the higher levels, it would fit that gap?

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1 A. It wouldn't have needed so much, no.
 2 Q. Okay, that's helpful.
 3 The trimming on site, was that something that
 4 Osborne Berry would do, trimming on site?
 5 A. Yes, yes.
 6 Q. Would that be subject to instructions from Harley or
 7 supervision from Harley?
 8 A. No, you just do that naturally.
 9 Q. But there was no reference back to the Siderise
 10 installation guidance when you were doing that trimming?
 11 A. No.
 12 Q. At the time, did you generally understand that the
 13 purpose of cavity barriers within rainscreen systems was
 14 to inhibit the passage of fire from window openings into
 15 cavities, and then to inhibit the spread of fire within
 16 those cavities?
 17 A. I knew that you compartmentalised it.
 18 Q. Yes.
 19 A. But I didn't know that firebreaks had to go down the
 20 edges of windows --
 21 Q. Okay.
 22 A. -- or at the bottom of windows at the time.
 23 Q. Does that mean that you at the time understood that they
 24 were needed in the external wall --
 25 A. I did.

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1 Q. -- to stop fire spreading up that external wall cavity?
 2 A. Yes, I did.
 3 Q. Did you understand what the consequences might be of
 4 poorly fitting cavity barriers, for example if there
 5 were gaps in the system?
 6 A. I did.
 7 Q. And did you understand this might affect the performance
 8 of those barriers in the event of fire?
 9 A. I did.
 10 Q. Did you take any steps to ensure that all of the
 11 Osborne Berry fitters working on the Grenfell project
 12 understood that?
 13 A. I told them enough times, yes.
 14 Q. Did you have to remind them to fit --
 15 A. I reminded a few of them.
 16 Q. -- the cavity -- sorry.
 17 A. I reminded a few of them, yes.
 18 Q. What did you say to them?
 19 A. Just make sure it's neat and tidy. Make sure it fits
 20 properly.
 21 Q. Yes.
 22 A. But they were a good bunch of fitters, basically.
 23 Q. Okay.
 24 Now, when Mr Ben Bailey gave his oral evidence --
 25 I don't think we need to pull this up, it's at

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1 {Day40/138:7} -- he was asked whether he gave any
 2 instructions or guidance to Osborne Berry about the
 3 materials to be used or fire safety, and he said:
 4 "Other than the cavity barriers being an important
 5 part of that, I don't recall any specific conversations
 6 about topics ..."
 7 Now, so he seems to be indicating that there might
 8 have been a conversation about cavity barriers being
 9 an important part of the system. Do you recall having
 10 that conversation?
 11 A. I don't remember the conversation, but with Ben, it
 12 wouldn't surprise me if he said that, because he is
 13 very, very thorough on things like that.
 14 Q. Did Harley give you any guidance in respect of the
 15 cavity barrier installation in terms of fire safety?
 16 A. No.
 17 Q. Did Harley ever provide any specific instructions about
 18 which type of cavity barriers should be used in which
 19 location?
 20 A. We basically knew by what cavity barriers we had what
 21 went where. They were all kept separately: this was for
 22 horizontal and this was for vertical. They were stored
 23 in different places, basically, so nobody could make
 24 that mistake.
 25 Q. I see.

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1 Now, let's look at some pictures of the installation
 2 contained in Dr Barbara Lane's Phase 1 report. If we
 3 can turn first to {BLAS0000008/48}, if we can zoom in on
 4 that photograph. This is a Siderise RH25
 5 cavity barrier, and we can see that she's zoomed in on
 6 that part of the --
 7 A. Yeah.
 8 Q. -- tape, the green tape on the side of the barrier. We
 9 can see that this is an RH cavity barrier, a horizontal
 10 cavity barrier, installed in the vertical position. Do
 11 you agree?
 12 A. I do.
 13 Q. Do you agree that that's not correct?
 14 A. I do agree it's not correct.
 15 Q. Can you explain how this might have happened, horizontal
 16 installed in the vertical position?
 17 A. I can't answer that question. It's bugged me for a long
 18 time, the question about that, because I looked at these
 19 things in various locations many times, but I never ever
 20 saw that.
 21 Q. So you can't help us as to why that wasn't picked up by
 22 Osborne Berry during its supervision and checking of its
 23 work?
 24 A. I can't, I'm afraid.
 25 Q. If you had seen this, would you have thought that that

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1 installation was acceptable and in accordance with
 2 Harley's instructions?
 3 A. No, it would have been pulled out and redone.
 4 Q. Did you ever see any instances of horizontal
 5 cavity barriers used in the vertical position when you
 6 were --
 7 A. Not at all.
 8 Q. -- on site?
 9 A. Not at all.
 10 Q. So you didn't tell anyone to pull it out and redo it?
 11 A. No, never had this problem at all.
 12 Q. When Dr Lane and her team went to visit the site after
 13 the fire, they found in their inspections that there
 14 were no proper full fill vertical cavity barriers
 15 on site. Instead, the vertical cavity barriers all
 16 appeared to be the RH25 horizontal product intended for
 17 horizontal installation.
 18 Can you help us as to why no full fill vertical
 19 barriers were found on site after the fire?
 20 A. I can't. Because they were definitely -- that's
 21 something I know, that they were definitely used, a full
 22 fill barrier, because the depth of the barrier is much
 23 bigger than what the RH25 system is. It's a wider
 24 barrier.
 25 Q. Right.

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1 The BRE have also reported for the Met Police that
 2 they found the same thing. For the transcript, that's
 3 at {MET00039807/52}, paragraph 73.
 4 Did you ever see vertical cavity barriers, properly
 5 so-called, ie full fill barriers, actually on site?
 6 A. I did.
 7 Q. And I think you said you thought they were kept in
 8 a different location?
 9 A. They were kept in a different location, yeah.
 10 Q. So you can't help us as to why they don't seem to have
 11 been installed?
 12 A. I can't. I'm shocked that they weren't installed.
 13 Q. We've looked at some of the purchase orders, and it does
 14 appear that the vertical products were ordered from
 15 Siderise. If we just look at {HAR00000484}, and we
 16 might need to go to the native version of this.
 17 (Pause)
 18 No, okay. The native version does clearly show, you
 19 can take it from me, that this Harley purchase order
 20 dated 6 October 2015 shows RVG vertical cavity barriers
 21 being in the purchase order from Siderise. So they do
 22 appear to have been ordered, but you can't help us as to
 23 why we can't find those products on the tower?
 24 A. As far as I'm aware, they were on the tower, because
 25 I fitted some of them myself.

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1 Q. I see.
 2 A. And I know they were on site because I unloaded them off
 3 the lorry.
 4 Q. Yes, okay.
 5 Now, going back to the photo we were looking at,
 6 this is {BLAS0000008/48}, we can see that here we've
 7 also got the intumescent strip facing into the building;
 8 that's right, isn't it?
 9 A. Correct, yes.
 10 Q. Because the intumescent strip is down the side where the
 11 green tape is.
 12 A. That's correct.
 13 Q. So is it right that this installation is also wrong in
 14 another respect; not only has it been used in the wrong
 15 orientation, but whoever is installing it has also put
 16 the intumescent strip on the inside of the building?
 17 A. That is correct.
 18 Q. Again, can you help us as to how that might have
 19 occurred?
 20 A. I can't.
 21 Q. To your knowledge, were installers given clear guidance
 22 about where the intumescent strip was located and how to
 23 position the barrier so that it faced outwards and into
 24 the cavity?
 25 A. Most definitely.

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1 Q. Did you ever see this on site?
 2 A. No. As you've probably heard from BJ, it's very hard to
 3 see that once the insulation has gone on the column
 4 holding a firebreak in place, because it would be
 5 covered over by 100-mil of insulation.
 6 Q. Yes, I see.
 7 A. And that would hide it from your view.
 8 Q. When you say "heard from BJ", who do you mean by BJ?
 9 A. Ben Bailey.
 10 Q. I see.
 11 Is that because, in practice, on the same day that
 12 you would install this cavity barrier, the insulation
 13 would be applied over the top?
 14 A. Correct, otherwise the cavity barriers -- a wind would
 15 get up and just blow them straight off the building
 16 instantly.
 17 Q. Yes.
 18 A. So the cavity barriers have to go on, then the
 19 insulation up alongside them to hold them in place.
 20 Q. Does that mean that, for each cavity barrier, there
 21 would only be a small window of time for someone to
 22 notice that that was in the wrong position or the wrong
 23 orientation?
 24 A. Exactly, exactly.
 25 Q. Now, did you understand at the time of the install that

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1 the horizontal cavity barriers must fit tightly and
 2 precisely at their edges in order for them to be
 3 effective in a fire?
 4 A. I did.
 5 Q. Can we look at another one of Dr Lane's photos, this is
 6 {BLAS0000008/45}. So this is figure 8.49 of her Phase 1
 7 report, and what we can see here is she has pulled off
 8 a section of cavity barrier and she is highlighting that
 9 it's got very roughly cut edges. Do you see that?
 10 A. I do.
 11 Q. Then if we go over the page from 45 to 46
 12 {BLAS0000008/46}, and to figure 8.50, here what she is
 13 giving -- perhaps if we go to the top photo first and
 14 zoom in on that. She has explained that there's poorly
 15 fitting edges of those cavity barriers, both at the back
 16 edge and the side edges. Do you agree?
 17 A. I would agree.
 18 Q. And also that the intumescent strip on the top left-hand
 19 side has started to come away from the cavity barrier --
 20 A. I can see that as well.
 21 Q. -- where one of the rails has cut into it.
 22 A. Yeah.
 23 Q. Again, would you agree that both of those are examples
 24 of poor workmanship?
 25 A. Most definitely.

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1 Q. Did you ever see similar workmanship on site?
 2 A. Not at all.
 3 Q. And had you seen it, what would you have done?
 4 A. I would have ripped it off and redone it.
 5 Q. Yes.
 6 A. Or probably at the time I would have got the fitter who
 7 did it to rip it off and redo it.
 8 Q. Then if we look at the photograph underneath, again we
 9 can see she's highlighted a poorly fitting join between
 10 the two cavity barriers in this location. We can see
 11 this is on the columns because we can see the little
 12 indentations into the concrete at the bottom. So she is
 13 highlighting a poorly fitting join, but she's also
 14 highlighting that there, we have the intumescent edge
 15 facing in to the other cavity barrier. Do you see that?
 16 A. I have noticed that, yes.
 17 Q. Again, would you agree that these are examples of poor
 18 workmanship?
 19 A. That's not good.
 20 Q. And had you seen that kind of installation ...?
 21 A. That would have been taken out and redone.
 22 Q. Then if we can go to another photograph on page 44
 23 {BLAS0000008/44}, staying with this document, at
 24 figure 8.48, so at the bottom of that page. We're
 25 looking down at the top of the cavity barrier and we can

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1 see one panel of insulation on the top, some other's
 2 been pulled off.
 3 A. Yeah.
 4 Q. You can see she has highlighted there in the middle
 5 label a break in the cavity barrier at the location of
 6 the cladding rails.
 7 A. I can.
 8 Q. So what we see is that the horizontal cavity barrier was
 9 regularly interrupted over the length of the spandrel on
 10 every level by those rails.
 11 A. Correct.
 12 Q. Now, did you ever notice that on site?
 13 A. Yes, that's the only way you would have got the rails
 14 on.
 15 Q. Yes.
 16 A. You had to cut into the cavity barrier.
 17 Q. Did you ever discuss with anybody whether that might
 18 compromise the operation of the cavity barriers in that
 19 location and therefore need some kind of remedial
 20 solution?
 21 A. Not that I can remember. I remember asking somebody
 22 about it and was told, "You've got to cut into it to put
 23 them on", and that's all I can remember.
 24 Q. Is it your evidence, therefore, that that was how it was
 25 designed to be, not --

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1 A. Correct.
 2 Q. This isn't an example of poor workmanship?
 3 A. No, that's how it was designed to be.
 4 Q. Yes.
 5 A. That's the only way you'll get the cladding rail down.
 6 Q. Can we look at another document now. I referred earlier
 7 to the fact there was a BRE investigation after the fire
 8 for the Met Police. I just want to look at one of their
 9 reports. This is {MET00039807}. So this is a BRE
 10 report dated 20 February 2019, and essentially it sets
 11 out their findings from their site investigation work at
 12 the tower.
 13 If we go within it to page 55 {MET00039807/55}, and
 14 if we look at the top figure first, figure 37, can you
 15 see there that we've got the cavity barrier cut around
 16 the Reynobond --
 17 A. Panel.
 18 Q. -- panel on the column? Again, did you see instances of
 19 that on site?
 20 A. That picture's not telling the full tale.
 21 Q. Right.
 22 A. There should be a cladding rail going down inside there.
 23 Q. Right, I see.
 24 A. Because if you see -- and you notice at the top, there
 25 is a bracket on the top underneath the window?

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1 Q. Yes.
 2 A. Now, at the centre of that bracket would be a cladding
 3 rail which would shoot straight down that gap.
 4 Q. Yes.
 5 A. That's why that gap's there.
 6 Q. I see. So what might have happened is someone has
 7 removed the cladding rail and that's the gap that's
 8 created?
 9 A. Exactly.
 10 Q. Fair enough, I understand.
 11 Then look at figure 38 below. Can you see there
 12 what they're highlighting next to the cladding rail is
 13 a gap where the cavity barrier doesn't go right up to
 14 the --
 15 A. Yes, I can see that.
 16 Q. Would you accept that that's an example of poor
 17 workmanship?
 18 A. That's poor workmanship, yes.
 19 Q. So you agree that's poor workmanship?
 20 A. That should have been tighter. That should have been
 21 touching the aluminium of the channel that holds the
 22 panel.
 23 Q. Yes. So it should have been tightly fitted?
 24 A. Yeah, it should have.
 25 Q. Now, Mr Ben Bailey in his witness statement refers to

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1 various images from Dr Lane's Phase 1 report, and his
 2 evidence was that he was very shocked when he saw
 3 Dr Lane's photographs. For the transcript, that's at
 4 paragraph 32 of {HAR00010060/10}.
 5 Do you agree that the photographs we've seen from
 6 Dr Lane's report are shocking?
 7 A. I do.
 8 Q. And that that work was unacceptable?
 9 A. It certainly was.
 10 Q. And it was obviously work not carried out with
 11 reasonable skill and care?
 12 A. That's correct.
 13 Q. Mr Bailey also says, he says:
 14 "Through observations on site or when I conducted my
 15 checks I never saw workmanship like this, if I had,
 16 I would have immediately raised this with Taff and/or
 17 Bez of Osborne Berry to rectify."
 18 Can you help us as to why Mr Ben Bailey says he
 19 didn't see cavity barriers installed in the manner we've
 20 just discussed?
 21 A. It's exactly the same as I never saw them: you couldn't
 22 see everything on the building before it was covered,
 23 basically. It would even be hard for Building Control
 24 or clerk of the works to see some of these things.
 25 Q. Because they were being covered up so quickly --

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1 A. Covered up so quickly.
 2 Q. -- with insulation?
 3 A. Yeah, yeah.
 4 Q. Did it never occur to anybody that it might be important
 5 to perhaps pause the work or have some kind of system in
 6 place for checking those cavity barriers before the
 7 insulation went on?
 8 A. It would. If this was done off a scaffold, it would be
 9 a far easier project to manage.
 10 Q. Yes.
 11 A. Because you could get to every level whenever you wanted
 12 to. It would also have been protected from the weather,
 13 because the actual scaffold would be sheeted over in
 14 some respect or form. On a mast climber, it takes you,
 15 from bottom of the building to top of the building,
 16 20 minutes to get up and 20 minutes to come down.
 17 Q. Yes.
 18 A. You just couldn't be in every place. You couldn't keep
 19 an eye on everything that was going on, it would be
 20 an impossibility. You know, even if you had somebody
 21 down on the floor with binoculars, you would never see
 22 all of it. It would have been better done, as I say,
 23 off a scaffold. Or, like you said, stop the job and
 24 check everything as it goes on the building.
 25 Q. Yes.

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1 The use of mast climbers, was that common practice
 2 in your experience of installing these façades, or would
 3 a scaffold have been the norm?
 4 A. No, it is common practice to use a mast climber. These
 5 mast climbers to me were unusual in that there was eight
 6 of them. Normally there would have only been four.
 7 Q. Right.
 8 A. Which is also a lot easier to keep the building under
 9 control.
 10 Q. So you did have two mast climbers per face?
 11 A. Per face, yeah.
 12 Q. Yes.
 13 Cavity barriers around the windows. At the time you
 14 were working on the Grenfell project, were you aware
 15 that there was extensive industry guidance, including in
 16 something called Approved Document B on fire safety,
 17 which indicated that cavity barriers had to be installed
 18 around window openings in order to comply with the
 19 Building Regulations?
 20 A. I was not aware of this, no.
 21 Q. Had you ever heard of Approved Document B on
 22 fire safety?
 23 A. I haven't.
 24 Q. Had you ever looked at something called diagram 33 out
 25 of that?

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1 A. Not at all .
 2 Q. Had you ever installed cavity barriers around window
 3 openings on other buildings that you had worked on?
 4 A. Not that I can remember.
 5 Q. So in other rainscreen systems that you installed , is it
 6 your evidence that in none of those projects were you
 7 installing cavity barriers around the windows?
 8 A. Correct.
 9 Q. Did you notice, did it strike you at the time as
 10 something that was noteworthy, that there were no
 11 cavity barriers around the windows at the Grenfell
 12 project?
 13 A. Not at all .
 14 Q. And why? Can you help us as to why that wouldn't have
 15 been something that stuck out for you?
 16 A. Because of the compartmentalising, I assumed that
 17 cavity barriers weren't required around window frames.
 18 Q. Is that because you could see that there was a system of
 19 putting --
 20 A. A square round a flat , basically .
 21 Q. Yes, I see.
 22 Did you ever have any conversations with anybody on
 23 the Grenfell project about the lack of cavity barriers
 24 around windows?
 25 A. I did not.

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1 Q. So if we can just look at Mr Gary Martin's evidence,
 2 this is one of the Rydon employees, if we can go to the
 3 transcript on {Day30/19:2}, he is asked:
 4 "Question: Were you aware that cavity barriers had
 5 to be provided to close the edge of cavities , including
 6 around openings?
 7 "Answer: Yes, but if you're talking about windows
 8 specifically , there was a barrier -- a foil and tape
 9 barrier placed around the whole window opening, and when
 10 I thought about -- it should be a fire barrier or
 11 shouldn't be a fire barrier, I checked with the drawings
 12 and asked -- and I can't remember who I asked, but the
 13 comment back was that there was vertical and horizontal
 14 fire barriers continuing the compartment out through to
 15 the exterior cladding.
 16 "Question: I see.
 17 "Answer: So they weren't required around the
 18 window.
 19 "Question: Were you specifically told that, that
 20 they weren't required --
 21 "Answer: Yes.
 22 "Question: -- around the window?
 23 "Answer: Yeah.
 24 "Question: Can you recall who might have told you
 25 that?

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1 "Answer: I don't recall , but it prompted me to look
 2 at the drawings and there was nothing on the drawings to
 3 suggest that they should be.
 4 "Question: Do you think that it was somebody within
 5 Rydon that you would have spoken to?
 6 "Answer: I honestly can't remember.
 7 "Question: Is it possible that you spoke to someone
 8 outside Rydon about that question?
 9 "Answer: It would have been three people: probably
 10 Taff from Harleys, it would have been probably
 11 Dave Hughes, it could have been Jason North, or it would
 12 have been the clerk of works. It would have been one of
 13 those people."
 14 Now, can you help us as to whether you might have
 15 ever had any conversations with Gary Martin about
 16 cavity barriers , whether they were required around
 17 windows, whether it was sufficient to have them round
 18 the compartment, as you've just referred to? Can you
 19 recall that?
 20 A. I did not have a conversation, as I can remember, with
 21 Mr Martin.
 22 Q. You never had a conversation with Mr Martin?
 23 A. In regards with cavity barriers .
 24 Q. I see, yes.
 25 Now, I just want to ask you about the positioning of

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1 cavity barriers and how you measured where they should
 2 be. I want to start by just looking at something in
 3 Ben Bailey's evidence. If we look at {Day40/187:22} and
 4 following at the bottom of that page. He is asked the
 5 question:
 6 "Question: Did you ever measure the position of the
 7 cavity barriers as installed , so far as you did inspect
 8 them, against the drawings to make sure that the
 9 as-installed distances above the windows complied with
 10 the drawings?
 11 "Answer: I'm unsure of a specific time that they
 12 were measured.
 13 "Question: I'm not sure I understand that answer,
 14 'I'm unsure of a specific time that they were measured'.
 15 "Let me ask the question again: during any of your
 16 inspections of the work or workmanship of the
 17 installation of the façade, did you ever measure the
 18 position of the horizontal cavity barriers above the
 19 windows as installed by Osborne Berry against the
 20 drawings that you had?
 21 "Answer: I don't recall ."
 22 Now, can you help us as to whether you actually were
 23 measuring specifically where the horizontal
 24 cavity barriers were to go, above the window?
 25 A. We made a timber block that fitted on to the head angle

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1 of the window below --
 2 Q. Yes.
 3 A. -- and that was the position that the cavity barriers
 4 went off the sample panel --
 5 Q. Yes.
 6 A. -- on the 16th floor. So they were all set up the same
 7 as what that template panel was. Because that template
 8 panel was what everything worked off, basically .
 9 Q. Was it during the time you were working on that template
 10 panel that you identified the fact that you didn't want
 11 to cut into the EDPM?
 12 A. Exactly, exactly. That template panel was done so the
 13 architects, the main contractor, Rydons, Harley,
 14 everybody could come and look at it and say they agreed
 15 to where everything was before we started work fitting
 16 the firebreaks.
 17 Q. Therefore, that template panel showed the cavity barrier
 18 higher than had been on the Harley drawings?
 19 A. It did, it did, and if you look back in the paperwork
 20 from OBI to Harley, we actually charge somewhere for
 21 doing that template sample panel, so you will have
 22 a date of exactly when that was actually done.
 23 Q. Right. That's helpful, thank you.
 24 Let's just have a look at a photograph on this,
 25 {HAR00001524}. So here, is it right that what we can

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1 see horizontally are cavity barriers --
 2 A. Correct.
 3 Q. -- going through the insulation, with the Reynobond
 4 panels next to them that are labelled?
 5 A. Correct.
 6 Q. So in these photographs we get a sense, I think -- is
 7 that right? -- of how high above the windows those
 8 cavity barriers were; would you agree?
 9 A. I do.
 10 Q. So we can see there that they are further away from the
 11 windows than allowed for in the drawings?
 12 A. Correct.
 13 Q. Thank you.
 14 Now, just before leaving cavity barriers, I want to
 15 turn to another email. This is {CEL00008582}, and
 16 I want to start by looking at the bottom email on the
 17 first page, which is an email from Mr Anketell-Jones.
 18 This is 12 July 2013, and it's about a different
 19 project, it's the Isis House project, and the subject of
 20 the email is "Isis House Firebreak Visit". It's from
 21 Mr Anketell-Jones to Jonathan Roome, and at this point
 22 he was working at a company called Hilti .
 23 Mr Anketell-Jones writes:
 24 "Jon,
 25 "Taff (Mark Osborne) ...

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1 "Needs some help on site with the installation of
 2 firebreaks to make sure it's being done right, and
 3 discuss and resolve any problems he may be having.
 4 "Thanks.
 5 "Kind Regards
 6 "Daniel ..."
 7 Now, do you recall speaking to Mr Roome or anyone
 8 else about the installation of firebreaks at Isis House?
 9 A. Off the top of my head, no.
 10 Q. Okay.
 11 A. But it wouldn't surprise me because that was a curtain
 12 wall system --
 13 Q. Yes.
 14 A. -- with very, very heavy panels. I can't remember it
 15 off the top of my head, no.
 16 Q. Okay. So you can't help us as to what assistance you
 17 might have got in terms of --
 18 A. Not at all .
 19 Q. -- installation of firebreaks?
 20 A. Not at all .
 21 Q. Do you know why Mr Anketell-Jones might have been
 22 contacting Mr Roome for such guidance while he was
 23 working at Hilti ?
 24 A. I don't. That I can't answer.
 25 Q. Did you know of an individual called Jonathan Roome?

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1 A. That name -- that's the name that doesn't ring a bell .
 2 MS GRANGE: Okay. Fine.
 3 The installation of the windows, I want to ask you
 4 a few questions about those.
 5 Mr Chairman, this is another topic. It would
 6 probably take me more than five minutes, so I'm happy to
 7 break now if that's easier, or I'm happy to carry on and
 8 break after this topic .
 9 SIR MARTIN MOORE-BICK: How much longer do you think you
 10 will want in general?
 11 MS GRANGE: Probably between half an hour and 40 minutes.
 12 SIR MARTIN MOORE-BICK: Well, we either want to break now or
 13 after this topic, don't we? How long did you say,
 14 five minutes?
 15 MS GRANGE: Yes. It's four pages of notes, so it's more
 16 than a few minutes.
 17 SIR MARTIN MOORE-BICK: Shall we break now?
 18 MS GRANGE: Yes.
 19 SIR MARTIN MOORE-BICK: All right.
 20 Mr Osborne, we're going to have a break now in the
 21 middle of the afternoon. We will come back and resume
 22 at 3.30, please. Please don't talk to anyone --
 23 THE WITNESS: That's fine.
 24 SIR MARTIN MOORE-BICK: -- while you're out of the room
 25 about your evidence or anything relating to it. Okay?

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1 Right, would you like to go with the usher, then,
2 please.
3 (Pause)
4 All right?
5 MS GRANGE: Thank you.
6 SIR MARTIN MOORE-BICK: 3.30, please. Thank you.
7 (3.15 pm)
8 (A short break)
9 (3.30 pm)
10 SIR MARTIN MOORE-BICK: All right, Mr Osborne, ready to keep
11 going?
12 THE WITNESS: I'm fine, thank you.
13 SIR MARTIN MOORE-BICK: Yes, Ms Grange.
14 MS GRANGE: Yes, just a few questions now about the windows,
15 and I want to look at a couple of drawings to start
16 with. If we can look at, first of all, {SEA00003040/7}.
17 So this is a drawing that was stamped by
18 Studio E Architects as category A, "Conforms to design
19 intent". We can see there that was added on
20 16 January 2015, and it's a window jamb detail drawing.
21 Do you see that?
22 A. I do.
23 Q. It's looking at where the windows meet the columns.
24 We can see this drawing is marked "Approved for
25 construction" on the bottom right.

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1 A. We can.
2 Q. If we can show side by side with that drawing a similar
3 drawing, {HAR00010440}, and what we're getting on the
4 right-hand side is effectively the same basic drawing,
5 but we don't have a Studio E stamp on this, but there
6 are some key changes as between the two.
7 Perhaps we can then pull up the second drawing to
8 make that big on the page and just look at that. They
9 both have the same drawing number, but if we can zoom in
10 to this drawing, when Mr Lamb gave his evidence to
11 the Inquiry, at paragraph 31 of his witness statement,
12 he explained that there were some differences between
13 the stamped version, the Studio E stamped version, and
14 this version.
15 The stamped version had shown local fixing straps
16 that were to be installed behind the window frame, and
17 this was removed on this unstamped drawing in order to
18 reflect things as they had been built. Then this
19 unstamped drawing doesn't show local fixing straps, but
20 instead a layer of adhesive foam in the cavity between
21 the window frame and the EPDM membrane.
22 So if we look right in the centre, we see a grey
23 area --
24 A. I can.
25 Q. -- with a label "Adhesive foam", and that's immediately

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1 in front of the EPDM membrane, which I think is shown
2 with a black dotted line. Do you agree?
3 A. I do.
4 Q. We just wanted to ask you a little bit about this window
5 detailing. Can you tell us, was it the first version of
6 this drawing or this version of the drawing with
7 adhesive foam that was actually built on site?
8 A. It was this version of the drawing.
9 Q. Yes.
10 A. But I don't remember putting adhesive foam --
11 Q. Right.
12 A. -- down the joint.
13 Q. That was my next question, so whether or not it was
14 Osborne Berry that installed the layer of foam in the
15 cavity between the window frame and the EPDM membrane.
16 Can you help us on that?
17 A. No, it definitely wasn't Osborne Berry, as far as I'm
18 aware.
19 Q. No, okay.
20 If we look at page 9 of your second witness
21 statement, this is {OSB00000090/9}, and look at
22 paragraph 16(d), in the middle of that page, you're
23 asked:
24 "Describe precisely where fire foaming was applied
25 by Osborne Berry."

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1 You say:
2 "Osborne Berry applied fire foam to the exterior
3 window frame and insulation."
4 Can you help us there as to where exactly fire foam
5 was applied in relation to the windows, insulation or
6 other parts of the external façade of the building?
7 A. In respect of fire foam, it was put in to hold the
8 windows in place, because they weren't actually screwed
9 in.
10 Q. Right.
11 A. The windows fitted on a double angle system where the
12 top bead was 25-mil deep on the bottom of the angle and
13 the bottom bead was 15-mil deep. So you lifted it up
14 and dropped it down and then packed it to suit, and fire
15 foam was used all around the perimeter of that to hold
16 the window to the bead.
17 Q. Right. Okay. So you're talking about fire foam round
18 the edge of that window?
19 A. The top and the bottom, not the jambs.
20 Q. You're not talking about down the jambs?
21 A. No.
22 Q. Okay, that's really helpful.
23 Who asked Osborne Berry to apply that foam around
24 the window frame?
25 A. That would be Ray from Harley, I believe.

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1 Q. Right. Do you know whether that instruction was
2 reflected in any of the drawings?
3 A. I cannot remember.
4 Q. Can you recall whether anyone discussed the fire
5 performance of that foam?
6 A. Not with me, no.
7 Q. Okay.
8 A. All I can tell you is it definitely had "Fire foam"
9 written on the can.
10 Q. Now, with reference back to the drawings we were looking
11 at and that jamb position, because the windows were
12 positioned, the new windows, outside and forward of the
13 original concrete line of the building, it's right,
14 isn't it, that there was a gap down the side of the
15 windows --
16 A. That's correct.
17 Q. -- which varied in its dimensions; is that right?
18 A. That's correct.
19 Q. The Inquiry experts have put that as between 35 and
20 90 millimetres, that gap.
21 Sorry, I beg your pardon, in the Harley drawings
22 it's marked as between 35 and 90 millimetres, but
23 Dr Lane measured that gap as between 30 and
24 120 millimetres, as a bigger gap. Would you agree with
25 that?

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1 A. I would agree with Dr Lane 100%.
2 Q. Yes.
3 Did you ever consider, given that gap, whether there
4 ought to be some form of fire barrier at the window
5 jambs and, in particular, between the EPDM membrane and
6 the insulation in the column cavity?
7 A. Well, I would have thought plasterboard would have been
8 put on the inside to stop the fire spread.
9 Q. Right, I see. So your expectation, was it, was that
10 there would be a plasterboard lining on the window
11 interior reveals?
12 A. That's correct.
13 Q. Yes. That's helpful. Well, we're going to be exploring
14 that with Mr Dixon tomorrow.
15 But is it right you never had any discussions about
16 the vulnerability that was created by that gap?
17 A. Not at all.
18 Q. No.
19 So supervision and training now, I want to ask you
20 some questions about the supervision of fitters.
21 It's right, isn't it, that Osborne Berry used
22 self-employed fitters throughout the installation
23 process?
24 A. Correct.
25 Q. Now, we saw from the method statement -- let's just pull

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1 that back up, this is {HAR00010913}. This is the method
2 statement which I think you said you didn't look at at
3 the time, or don't remember considering.
4 We know you're described as the site foreman. Was
5 that throughout the installation works, you were the
6 site foreman?
7 A. Yes, I got that task, I'm afraid.
8 Q. Does that mean that you undertook the bulk of the
9 supervision of Osborne Berry's fitters?
10 A. No, Grahame and I both --
11 Q. Right.
12 A. -- looked after the job.
13 Q. How did you divide that between you?
14 A. Basically, whichever face we were working on, we would
15 do the one to the opposite side of us, so we would look
16 after two faces. So if you were working on the west,
17 you'd look after the south. If you were working on the
18 north, you would look after the east, and various as you
19 went round the building.
20 Q. I see.
21 On page 3 {HAR00010913/3} of this document, in the
22 very last paragraph, if we can go to that, it says:
23 "All operatives should read and understand the
24 method statement and risk assessment before carrying out
25 the works. If an operative is unsure of the

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1 requirements then they should ask their line manager or
2 site manager ..."
3 Now, I appreciate you say you didn't see this
4 particular method statement, but did Osborne Berry
5 provide its operatives with the method statements that
6 were given to them by Harley on the job?
7 A. I don't think we actually gave them the method
8 statement, we just told them how we would want it done
9 from the method statement.
10 Q. I see.
11 Did any fitters ever say to you that they were
12 unsure about how to fit any part of the cladding system?
13 A. Not that I can remember, but there again, most of them
14 worked with me for quite a while before they went on to
15 do it on their own, so they'd already had a fairly good
16 briefing into how to do it.
17 Q. Were you satisfied that all the labourers were able to
18 fully understand the work that had been tasked to them?
19 A. Yes.
20 Q. Did these fitters have access to members of Harley or
21 Rydon in order to receive any assistance and advice if
22 needed?
23 A. If they needed to, yes.
24 Q. Both Harley and Rydon were there for them?
25 A. They would have spoke to either of them, yeah.

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1 Q. Then at page 7 {OSB00000087/7} of your first witness
 2 statement -- for the transcript, this is paragraph 11 --
 3 you say that on-site training was provided to those who
 4 were employed to assist Osborne Berry in the
 5 installation process.
 6 Can you help us as to what type of on-site training
 7 was provided to those who were involved?
 8 A. Basically I would just show them how to do it.
 9 Q. So you would physically do it in front of them?
 10 A. I would set it all up and make one physically and do the
 11 actual job that they were meant to do, and stay with
 12 them for a while until they got used to it. So they
 13 would probably work on the same mast climber as me for
 14 a week or so.
 15 Q. Yes.
 16 A. One working to the left, one working to the right. So
 17 they would just follow what I was doing, basically.
 18 Q. Would they be provided with any separate information
 19 about how to do it, such as from the drawings or any
 20 other guidance?
 21 A. Drawings would be available if they wanted them, yes.
 22 Q. Do you think the fitters would have referred back to the
 23 drawings or is that unlikely?
 24 A. I think some of them referred back to the drawings.
 25 SIR MARTIN MOORE-BICK: Can you tell us, how many fitters

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1 did you have, a maximum number?
 2 A. Right at the end, 14.
 3 SIR MARTIN MOORE-BICK: 14?
 4 A. Yeah.
 5 SIR MARTIN MOORE-BICK: Did the numbers build up over
 6 a period of time?
 7 A. They did, yes, they did. It started off with three
 8 doing the measurement work, then it went to two doing
 9 all the drilling, and then it just built up from there,
 10 to six, to eight, and then at the end it built up to 14,
 11 basically.
 12 SIR MARTIN MOORE-BICK: Thank you.
 13 MS GRANGE: Yes.
 14 Now, within this method statement on page 1
 15 {HAR00010913/1}, if we look in the third paragraph it
 16 says:
 17 "All operatives undertaking manual work will hold a
 18 relevant and valid CSCS card ..."
 19 We'll come to that in a moment, and then they say:
 20 "Harley will ensure that regular tool box talks are
 21 carried out, with training provided where necessary."
 22 Were you ever aware of something called
 23 Toolbox Talks being carried out?
 24 A. I was not aware of any Toolbox Talks on the job, no.
 25 Q. So you don't think any fitters did have the benefit of

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1 Toolbox Talks?
 2 A. Not that I can remember.
 3 Q. And the reference there to their holding a valid CSCS
 4 card, can you help us as to what that was referring to?
 5 A. That's the card that allows us to work on a building
 6 site in England, basically.
 7 Q. Yes.
 8 A. And if you need references to the cards, I believe
 9 Rydons would have that.
 10 Q. Right, yes.
 11 Now, turning to page 6 of your second witness
 12 statement, if we look at that, {OSB00000090/6}, at the
 13 very bottom of the page you say it was you and Mr Berry
 14 who supervised the installation. Then over the page
 15 {OSB00000090/7}, it says:
 16 "How was this supervision conducted?"
 17 And it just says:
 18 "By verbal communications on site."
 19 You have said thereafter that:
 20 "Osborne Berry did not keep any written
 21 documentation of the supervision. However, Osborne
 22 Berry reported to Harley by verbal communications the
 23 progress of the refurbishment ..."
 24 Now, just pausing there, were these fitters
 25 supervised by Osborne Berry on a daily basis?

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1 A. Yes and no. If they had problems, they'd phone us up
 2 and ask us to come and have a look, but we weren't with
 3 them all the time, because obviously eight mast
 4 climbers, there is a lot of places on the building.
 5 Q. Yes, yes.
 6 A. So not on a daily basis, no.
 7 Q. How frequently were you or Mr Berry on site during the
 8 period of the works?
 9 A. Me, the whole job, from start to finish. Mr Berry,
 10 I would say between half and three-quarters of the job.
 11 Q. Were any records kept of the supervision and the results
 12 of that supervision?
 13 A. I'm afraid not.
 14 Q. What about photographs? Would you accept that it would
 15 be common practice, good practice, for an installer to
 16 take photographs of the installation as it progressed,
 17 in particular so that you could show that to anybody who
 18 was needing to see what was underneath, for example, the
 19 insulation?
 20 A. In hindsight now, yes, and I take so many photographs,
 21 my phone can't keep up with them. That is in hindsight
 22 of Grenfell Tower.
 23 Q. Does that mean that, at the time of the Grenfell
 24 project, you weren't taking photographs?
 25 A. No. I wasn't very well up with that. I believe my

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1 business partner might be able to supply you some
 2 photographs that he took on his phone or were passed to
 3 Rydons, but I can't verify that.
 4 Q. I see. But you didn't have at the time a formal system
 5 of regularly taking photographs --
 6 A. No.
 7 Q. -- so you could hand those over to relevant inspectors,
 8 including Building Control inspectors?
 9 A. No.
 10 Q. Were you satisfied that a consistent approach was taken
 11 to supervision on the project?
 12 A. I was, yes.
 13 Q. Now, if we look at page 7 of your first witness
 14 statement, {OSB0000087/7}, at paragraph 12 there, you
 15 are asked:
 16 "To what extent did Osborne Berry supervise the work
 17 of those installing ..."
 18 You say:
 19 "This was done to the best of our abilities but with
 20 8 mast climbers working on this process, it was not
 21 possible to watch/check every individual item installed
 22 by the people we employed to assist us."
 23 So can you help us as to how much of the work of the
 24 individual installers would probably not be checked
 25 on site? I mean, how frequently would you and Mr Berry

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1 go up on the mast climbers and check an individual
 2 fitter's work?
 3 A. It's hard to say. Some fitters would get checked more
 4 than others, but some fitters probably wouldn't get
 5 checked for a week on, basically.
 6 Q. Right.
 7 A. Because we knew them and trusted them, basically.
 8 Q. I see.
 9 A. The ones I checked most of all were the ones we had from
 10 agencies.
 11 Q. Yes.
 12 A. Because we used agency fitters, and I wasn't sure of
 13 those, so they got more checks than our regular fitters
 14 that had worked on Little Venice with us and
 15 Commercial Road.
 16 Q. On the job, I think you've just explained that there
 17 were perhaps up to 14 fitters by the end. What
 18 proportion of those were agency versus your regular
 19 fitters?
 20 A. Erm ... I think there was three teams of agency fitters.
 21 Q. Yes.
 22 A. That would be fitter and mate, basically.
 23 Q. Right, yes.
 24 Now, if we can look at a document {HAR00011476}.
 25 This is a document authored by Harley, and appears to be

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1 a rescue plan to be communicated in the form of
 2 a Toolbox Talk by the site manager or London Hoist
 3 contract supervisor. Do you see that there?
 4 A. I do.
 5 Q. It said:
 6 "In the event of a machine breaking down at height
 7 or if there is an injury ... follow the following rescue
 8 plan."
 9 You are there as the site manager; do you see that?
 10 A. Precisely, I've just been promoted. That changed to
 11 suit people, I think.
 12 Q. I see. So did you ever think of yourself as the site
 13 manager on the job?
 14 A. Not at all.
 15 Q. Can you explain as to why this says you were the site
 16 manager?
 17 A. I have not got a clue.
 18 Q. But in practice, did you consider that you and Mr Berry
 19 were there at least in part to supervise the work and
 20 inspect the work of the fitters to make sure it had been
 21 done correctly?
 22 A. We were there to make sure they did a good quality of
 23 work, yes.
 24 Q. Yes.
 25 In Mr Ben Bailey's witness statement he says at

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1 paragraph 13 -- for the transcript that's
 2 {HAR00010060/5} -- that:
 3 "I believe that Taff and Bez were also inspecting
 4 the work as I remember asking them at various points and
 5 they would confirm that they were."
 6 Do you agree with that, that --
 7 A. I do.
 8 Q. -- you did confirm to Mr Bailey that you were
 9 inspecting --
 10 A. We did --
 11 Q. -- the work?
 12 A. -- yeah.
 13 Q. Do you agree, and was this your understanding at the
 14 time, that Harley was relying on Osborne Berry to
 15 inspect and check the work carried out by the fitters?
 16 A. Not to inspect it, to make sure it was done to
 17 a standard.
 18 Q. Right.
 19 A. But not to fully inspect the work, no.
 20 Q. And Mr Osgood, when he gave evidence -- for the
 21 transcript, this was at {Day30/132:12} -- was asked
 22 whether Harley was inspecting the work and whether
 23 Osborne Berry were checking their own work and he
 24 replied:
 25 "Absolutely, yes. We wouldn't inspect until they

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1 had done that.”
 2 He was asked who was doing that, and he said:
 3 “Taff being the lead fixer ...”
 4 Again, would you agree with that, that you were
 5 inspecting before Mr Osgood?
 6 A. I made sure I went round and made sure everything was
 7 sealed and properly done before he looked at it, yes.
 8 But most of it was just a visual check.
 9 Q. Later on in that transcript, at {Day30/142:15},
 10 Mr Osgood was asked what checks he actually carried out,
 11 and he answered:
 12 “Again, we had a specification, and we went through
 13 that, both myself, Taff, and we checked everything, as
 14 far as I’m aware.”
 15 Was it your practice, when you were checking what
 16 your fitters had done, to go back to the specification
 17 and the drawings and to check it?
 18 A. Not that I’m aware of, no.
 19 Q. So what were you inspecting for or checking for?
 20 A. I just made sure everything looked neat and tidy,
 21 basically, and that everything was uniform.
 22 Q. Yes.
 23 In the position statement, we looked at it earlier,
 24 Osborne Berry’s position statement, you had set out 11
 25 different stages of the installation process. Can you

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1 help us as to whether Osborne Berry would inspect the
 2 work carried out by the fitters at each of those 11
 3 stages?
 4 Do you want to have a look at that? It’s
 5 {OSB000000084}, paragraph 8, and it goes from pages 1
 6 through to page 2.
 7 So at the bottom of that page, there is a summary of
 8 the installation process, and then the different stages
 9 are set out, and it goes on to page 2.
 10 Can you help us as to whether there would have been
 11 a check by Osborne Berry at each of those stages? Is
 12 that how it was structured?
 13 (Pause)
 14 A. There would definitely be one for the shelf angles and
 15 EPDM and the windows, and that would probably entail the
 16 brackets being on at the same time.
 17 Q. But would there be some of these stages where you
 18 wouldn’t check at the end of the stage?
 19 A. There most definitely would. You wouldn’t have checked
 20 every single thing.
 21 Q. Okay.
 22 A. Most of the holes that you’ve got down there, vertical
 23 concrete columns, most of the drilling, that was
 24 pre-checked and it was checked by an outside company to
 25 make sure that the pull-out tests were correct and up to

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1 standard, basically.
 2 Q. Yes. Yes.
 3 Did you have any feedback mechanisms? Where you had
 4 given feedback to a fitter saying you weren’t happy with
 5 something, did you have any formal mechanism in place to
 6 make sure any workmanship issues identified were
 7 remedied and not repeated?
 8 A. I did, and I -- as I said earlier, I would go and check
 9 that particular fitter more than I checked any other
 10 fitters, basically.
 11 Q. I see. So if you were giving feedback and you weren’t
 12 happy with the work, you would just increase the
 13 frequency with which the work was checked?
 14 A. Checked, yeah.
 15 Q. Would you ever formally record it in a diary or
 16 a document?
 17 A. I probably did in my diary.
 18 Q. I see, okay.
 19 Now, inspections by others now, and starting with
 20 Harley.
 21 At paragraph 11 of Mr Ben Bailey’s witness
 22 statement, if we just bring this up, at {HAR00010060/4},
 23 I want to look at the very top of that page, and he says
 24 this:
 25 “I never spoke with the fixer - installers directly

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1 about work issues but would speak regularly with Taff
 2 and Bez about all elements of the installation including
 3 cavity barriers. I would ask them if they were happy
 4 with the installation and how it was coming along. They
 5 always reported back to me that everything was ok, save
 6 for the usual day-to-day site issues, none of which
 7 related to fire safety.”
 8 Do you see that there?
 9 A. I do.
 10 Q. Now, do you agree with what Ben Bailey said there about,
 11 first of all, that he would speak regularly with you
 12 about all elements, including the cavity barriers?
 13 A. He would speak about various things at different times
 14 he arrived. I can’t remember if it was specifically
 15 cavity barriers. Whether he spoke to the fixers or not,
 16 I couldn’t answer that question. I don’t know.
 17 Q. Yes.
 18 A. But he would ask us how we were progressing, yes.
 19 Q. Later on in that paragraph, he said:
 20 “I would monitor the overall progress being made in
 21 order to keep the work on schedule. Whilst I attended
 22 site about 2 to 3 times a week (depending on what was
 23 going on) I would not go up the mast climber each time
 24 I was there as this would disrupt the work of the
 25 installers.”

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1 Now, is it your recollection that Mr Ben Bailey
 2 would be attending site two to three times a week?
 3 A. Not in the beginning, but at the end, yes, definitely.
 4 And he would go up in the mast climbers because he would
 5 normally go up after the installers had gone home.
 6 Q. Right, I see.
 7 A. As I was aware.
 8 Q. You are drawing a distinction between what he did at the
 9 beginning and what he did by the end. Can you recall
 10 what it was that resulted in him coming more frequently?
 11 A. I think he was asked to by Rydons.
 12 Q. Right.
 13 Would Ben Bailey deal with any issues that were
 14 arising on site relating to the installation?
 15 A. Yes.
 16 Q. Did he ever discuss any problems with the quality of the
 17 installation with you?
 18 A. Not at all.
 19 Q. How did Harley inform Osborne Berry of any snagging
 20 issues with the cladding installation?
 21 A. There was some paperwork. Ben would raise a form with
 22 a -- and identify with pictures various things that he
 23 wanted rectified.
 24 Q. Yes.
 25 A. That's as I remember it.

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1 Q. I see. How did you make sure that each of those was
 2 resolved?
 3 A. Well, either myself or one of the lead fitters would go
 4 round and resolve the problems, basically, and then
 5 Mr Bailey would go and check it again.
 6 Q. Yes.
 7 Now, in his oral evidence to the Inquiry, Ben Bailey
 8 recalled that he performed visual checks of levels 1 to
 9 20 on the north, west and east elevations. Can you
 10 recall him undertaking those kind of inspections?
 11 A. Yes, yes.
 12 Q. But in terms of the south elevation, it would appear
 13 that he didn't check the south elevation. Was that your
 14 recollection?
 15 A. I can't answer that, I do not know, but I would have
 16 assumed he checked the south as well.
 17 Q. I see. But do you have any memory --
 18 A. I haven't any memory, no.
 19 Q. Yes.
 20 Rydon now. Were Rydon also inspecting
 21 Osborne Berry's work so far as you were aware?
 22 A. I believed that the Building Control and Rydons checked
 23 over the work, yes.
 24 Q. At the same time? Would Building Control and Rydon
 25 inspect --

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1 A. I think Building Control went with Rydons, if I remember
 2 correctly.
 3 Q. I see.
 4 Were you conscious of any other more frequent
 5 inspections by Rydon?
 6 A. No, not really.
 7 Q. When the work was inspected by Rydon, was that as it
 8 proceeded, stage by stage, or only after the exterior
 9 ACM was in place?
 10 A. As it proceeded through the job.
 11 Q. I see. And were you or Mr Berry always present during
 12 Rydon inspections?
 13 A. Not at all, as I can remember.
 14 Q. And can you remember any particular individuals at Rydon
 15 that would actually inspect your work?
 16 A. I can't.
 17 Q. Okay.
 18 A. Sorry.
 19 Q. Can you recall any problems being highlighted by Rydon
 20 about the quality of the installation?
 21 A. Not at all.
 22 Q. Was there any formal process for signing off portions of
 23 Osborne Berry's work by Rydon?
 24 A. You would have to speak to BJ, because he dealt with all
 25 that signing-off paperwork.

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1 Q. Again, you're referring to the evidence of Ben Bailey
 2 there?
 3 A. Yeah.
 4 Q. If we could look at a document, {RYD00051861}, this is
 5 a defects list for Grenfell Tower. It's
 6 a Rydon-generated document.
 7 Do you recall ever receiving documents like this?
 8 A. I have seen documents like this before.
 9 Q. On the Grenfell project?
 10 A. On the Grenfell project, yes.
 11 Q. So you think you did see them?
 12 A. Yes.
 13 Q. I mean, item 21, for example, says "Scratches to glass",
 14 that would be something for Osborne Berry to address,
 15 would it?
 16 A. It would.
 17 Q. So can you recall being provided with defects lists like
 18 this and then remedying them?
 19 A. I can.
 20 Q. Yes.
 21 So when Mr Hughes, David Hughes of Rydon, gave
 22 evidence, on {Day27/86:16} -- perhaps if we can just
 23 pull this up. If we start with the question he's asked
 24 at line 16 he's asked:
 25 "Question: Did you identify any defects or issues

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1 with the cladding prior to this Building Control visit?
 2 "Answer: No, not with the cladding, but I go back
 3 to what I told you earlier: one thing I did notice, that
 4 the gaps -- the joins on the insulation boards weren't
 5 taped. I asked Taff and Bez this question and they said
 6 that they didn't need to, and that's when I went back
 7 and referred to the Celotex -- or had a look at the
 8 Celotex brochure to see if I could see anywhere
 9 specifically it said that the joins had to be taped."
 10 Do you see that there?
 11 A. I do.
 12 Q. Then it says:
 13 "And I'm talking about the joins between insulation
 14 boards.
 15 "Question: Yes."
 16 A. As far as I was aware, all joints in insulation board,
 17 all fixings, were taped over. That would be something
 18 that BJ would have checked and inspected and pulled us
 19 up on, because that was a must to stop dampness or
 20 moisture getting into the system.
 21 Q. I see. Just to be clear, when you're talking about the
 22 joints, that was --
 23 A. Where two boards plug together like that --
 24 Q. -- how the boards come together?
 25 A. -- straight across the flat joint.

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1 Q. Did anyone ever raise with you the question of whether
 2 the exposed edges of the insulation boards also ought to
 3 be taped?
 4 A. No, not at all, but I have something to say on that. If
 5 you buy a product that all edges were taped when it
 6 arrives with you --
 7 Q. Yes.
 8 A. -- you would naturally assume, if you cut it, you have
 9 to re-tape the edge.
 10 Q. Right.
 11 A. These come with four open edges.
 12 Q. Yes.
 13 A. So you never assume you have to tape it.
 14 Q. I see.
 15 A. And no paperwork was provided to tell us to tape it.
 16 Q. Did you yourself ever look at the Celotex rainscreen
 17 cladding guide, the document that Mr Hughes says he
 18 looked at?
 19 A. No.
 20 Q. So you didn't ever check what that said in terms of
 21 taping of joints?
 22 A. I didn't. I trusted Dave, and if Dave said some had
 23 been missed, then I would have gone out and redone the
 24 taping, and told the fitters who were doing it that they
 25 were meant to tape the joints, basically.

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1 Q. When we looked at the Harley method statement earlier,
 2 I read out to you a bit, item 10 of that statement on
 3 the column cladding, it said "Taping joints with class 0
 4 adhesive foil tape", do you remember that?
 5 A. I do.
 6 Q. Now, did you ever discuss with anyone why the joints in
 7 the insulation boards were taped but the edges were not?
 8 A. I did not.
 9 Q. When you saw a class 0 adhesive foil tape, did you think
 10 the class 0 was relevant to its fire performance?
 11 A. I did.
 12 Q. Have you ever worked on a project where the edges of
 13 such insulation board are taped?
 14 A. They still aren't being taped to this day.
 15 Q. Yes.
 16 When Mr Hughes gave evidence, it was slightly
 17 unclear, but at one point it seemed that he thought that
 18 there hadn't been taping of insulation joints. As far
 19 as you're concerned, was that work actually carried out?
 20 A. Most definitely.
 21 One answer to that one, Building Control would have
 22 picked it up, and so should the clerk of the works and
 23 so should BJ, because it would have been such an obvious
 24 thing, you couldn't miss it.
 25 Q. Yes.

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1 Building Control now, just a few questions about
 2 them.
 3 In your first witness statement -- this is at page 3
 4 {OSB00000087/3}, paragraph (l) -- you say that the
 5 building inspector had oversight of the installation
 6 process. Let's look at that. We can see at (1), after
 7 (k), there is the question:
 8 "What was the chain of decision-making,
 9 communication and responsibility ..."
 10 And you say:
 11 "Harley made all the decisions in relation to how
 12 the cladding, insulation and windows were to be
 13 installed. Osborne Berry installed items as directed.
 14 The building inspector had oversight of the installation
 15 process."
 16 Then at the bottom of that page, at paragraph 5, you
 17 also say, if we pick it up in the middle, you say:
 18 "... there was an inspection carried out by
 19 Ben Bailey from Harley Facades Limited/Harley Curtain
 20 Wall Limited, Rydon Maintenance Limited and the local
 21 Council Building Inspector. All confirmed that there
 22 were no issues in relation to the installation of the
 23 windows and cladding."
 24 Now, were you aware at the time of the project that
 25 somebody called Mr Hoban was responsible for inspecting

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1 the cladding from RBKC Building Control?
 2 A. No, I wasn't.
 3 Q. So you didn't ever get introduced to the
 4 Building Control inspectors themselves?
 5 A. Not at all. The only inspector I remember was the ...
 6 oh, Building Control. Clerk of works.
 7 Q. Okay, Mr White.
 8 A. Yes, that's the only man I can remember, and I actually
 9 took him up once in a mast climber.
 10 Q. So you took Jon White up once in a mast climber?
 11 A. I did.
 12 Q. Did you ever go up the mast climbers with Mr Hoban or
 13 RBKC Building Control?
 14 A. Not that I can remember.
 15 Q. Okay.
 16 Were you ever present at any of the Building Control
 17 inspections?
 18 A. No.
 19 Q. Mr Hoban has said that a number of things were said to
 20 him on site, for example that the cladding was compliant
 21 with the Building Regulations, that it had been used in
 22 hundreds of other buildings. Could it have been you
 23 that he was having any of those discussions with?
 24 A. Not that I'm aware of.
 25 Q. So you don't recall telling --

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1 A. I don't.
 2 Q. -- a Building Control inspector anything about the
 3 compliance of the system or how frequently this system
 4 had been fitted to buildings in England and Wales?
 5 A. I don't remember having conversations with the
 6 Building Control, to be honest.
 7 Q. Great, thank you.
 8 The clerk of works, then. So Mr Jon White, did you
 9 understand him to be the clerk of works on the project?
 10 A. I did. I did.
 11 Q. Did you understand him to be on site one day a week or
 12 more frequently than that?
 13 A. I wasn't sure how many days a week he was on site.
 14 Q. I see.
 15 A. I've only learned that today from the earlier --
 16 Q. Yes.
 17 A. -- interview.
 18 Q. I think you have just said that you were present one
 19 time --
 20 A. I took him up once in the mast climber.
 21 Q. Yes.
 22 Can you help us as to whether or not the clerk of
 23 works was inspecting the cladding, so far as you were
 24 aware, more frequently than that?
 25 A. He was looking at everything, taking photos of various

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1 things.
 2 Q. So you were aware that he was going up the
 3 mast climbers?
 4 A. I was, yes.
 5 Q. And how often were you aware of him doing that?
 6 (Pause)
 7 A. I really wouldn't like to say, because I cannot
 8 remember. But I know he was on site, and Ben took him
 9 up a few times, and I think he went up with Dave a few
 10 times. There was quite a few times he was up the
 11 building.
 12 Q. Yes.
 13 A. Quite a few.
 14 Q. Were you aware of precisely what he was checking for?
 15 A. No.
 16 Q. Did you ever see any of his site inspection reports?
 17 A. No.
 18 Q. The final topic that I've got now is about some
 19 complaints and issues to do with complaints. If we can
 20 turn first to {IWS000001705}, this is a witness
 21 statement of Mr Luke Towner, who was the resident of
 22 flat 171. If we could look on page 6 {IWS000001705/6}
 23 at paragraph 27, I want to pick it up in the third line
 24 down of paragraph 27. He says:
 25 "Whilst the cladding was being installed, I thought

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1 to myself that it must be necessary to use fire
 2 retardant material on buildings the height of Grenfell
 3 Tower. I therefore asked one of the contractors whether
 4 the materials being used were compliant with building
 5 regulations for high-rise buildings and whether they
 6 were using fire retardant insulation. He responded that
 7 he was 'unsure' and would need to get the manager to
 8 speak to me.
 9 "Lynda Prentice from Rydon came to speak to me about
 10 the insulation."
 11 Now, do you recall ever speaking to this resident or
 12 indeed any other residents of Grenfell Tower regarding
 13 compliance of the materials with the
 14 Building Regulations?
 15 A. Not at all. I only actually spoke to one person,
 16 really, in the tower, who is no longer with us, and he
 17 was -- lived on the east elevation, and that is the only
 18 person I really held deep conversations with.
 19 Q. Yes.
 20 A. Because he was also into sea fishing, like I am. But as
 21 for anybody else, I don't remember this.
 22 Q. Can we now look at an email chain. This is
 23 {RYD00039173}. This is an email chain between Rydon and
 24 Harley. If we look at the bottom of page 1 and over to
 25 page 2, Ms Prentice, Rydon's resident liaison officer,

200

1 says to Simon O'Connor -- it's about flat 185, and if we
 2 go over the page {RYD00039173/2}, she says:
 3 "Hi Simon
 4 "I just received a text from David Collins in
 5 flat 185 stating that he found a part of the window
 6 installation hanging loose this morning he has taken it
 7 into his house as he didn't want it to fall 18 floors
 8 and also that there is some polythene on the back of one
 9 of the cladding panels which is blowing in the wind and
 10 has nearly come off ... can [it] be taken off safely."
 11 We can see at the very top of page 1
 12 {RYD00039173/1}, Ben Bailey says back to Simon O'Connor:
 13 "Yep I'll ask Taff to go and have a look."
 14 Can you remember this complaint about cladding
 15 panels hanging loose and --
 16 A. No, the cladding panel wasn't actually loose. What had
 17 happened is the low tack tape on the panel had come away
 18 from the bottom of the panel, so as the wind was
 19 blowing, the low tack tape was flapping backwards and
 20 forwards on the panel. So I just removed the low tack
 21 tape completely off the panel to open and expose the
 22 actual face of the panel, basically.
 23 Q. Yes.
 24 Can we then turn to {RYD00038501}. This is an email
 25 from Simon O'Connor to Ben Bailey of 9 April 2015, and

201

1 he says:
 2 "Afternoon Ben,
 3 "I have concerns over a certain member of your staff
 4 on site (Bez Taff's partner) following a number of
 5 complaints. these comprise of:
 6 "Knocking on windows asking for tea. (in jest or
 7 not) is not acceptable.
 8 "Banging on peoples windows to scare animals inside
 9 flats. (I have witnessed this on 1 occasion)
 10 "Feeding the wrong information to residents saying
 11 that it's all been put in the wrong way round because of
 12 Rydon and hopefully it won't leak.
 13 "A complete lack of respect for health and safety
 14 (Climbing across climbers - dropping material on public
 15 footpaths) to mention a few.
 16 "As you are aware we are tackling a difficult
 17 situation with residents as it is and these sorts of
 18 comments and behaviours only adds fuel to the fire.
 19 "If I have 1 more incident on site with this
 20 individual then I will have no option but to remove him
 21 from site permanently.
 22 "Regards
 23 "Simon O'Connor ..."
 24 Do you see that there?
 25 A. I do.

202

1 Q. Now, Mr Ben Bailey was asked about this email, and at
 2 the time we had redacted the "Bez Taff's partner".
 3 A. Yeah, I know all about that.
 4 Q. We can see now that this complaint was about
 5 Grahame Berry, your business partner; yes?
 6 A. It certainly was. I've known Grahame probably 35 years.
 7 This is not something Grahame would do. I asked
 8 Mr O'Connor for corroborative evidence.
 9 Q. Yes.
 10 A. And I then asked Mr O'Connor why a yellow card wasn't
 11 issued, when a week previous or two weeks previous he
 12 had issued a yellow card to one of my young fitters for
 13 swearing at a resident.
 14 Q. Right. And what did he say in response?
 15 A. He didn't, he walked away from me.
 16 Q. Right.
 17 A. Now, I had a word with Grahame. Grahame said he hadn't
 18 done that. I personally don't think he would have done
 19 that, so I let it go at that, basically.
 20 Q. I see. So was that your response to Rydon at the
 21 time --
 22 A. It was.
 23 Q. -- and indeed Ben Bailey, that you just didn't accept
 24 that this had happened?
 25 A. No. And the falling objects, that happened very early

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1 on in the contract. When we were drilling the holes for
 2 the angles to hold the windows, behind the insulation,
 3 as you have probably seen, it's a very pebbly surface.
 4 Q. Yes.
 5 A. Very large flints on there. I asked Rydons to supply
 6 a catch net to stop anything falling down on to people
 7 below, because what was happening, they supplied a fan,
 8 which is a scaffold boarded fan at an angle. But as
 9 you're probably aware, if a pebble is not quite the
 10 right shape, it doesn't mean to say it's going to go
 11 inwards, it could go left, right, or straight ahead.
 12 They told me it wasn't within their remit to do that, so
 13 I then had to make boxes that went between the
 14 mast climber and the wall --
 15 Q. Yes.
 16 A. -- so that if anything fell off when the drills hit the
 17 pebbles, they dropped straight in the boxes.
 18 Q. I see.
 19 A. This was made by Mr O'Connor a big thing, basically.
 20 Q. I see. So where there's reference here to a complete
 21 lack of respect for health and safety, that reference
 22 then in brackets to dropping material on public
 23 footpaths, you're sure, are you, that that's what that's
 24 referring to?
 25 A. I would assume that's what that's referring to.

204

1 Q. I see.
2 A. Because the only time we ever had anything come down off
3 a mast climber was the wind got up and blew some bits of
4 insulation down.
5 Q. Right. Yes.
6 A. You can't keep those safe 100% of the time. Even if you
7 put them in a bag, and the wind gets up, they just blow
8 out the bag.
9 Q. What about climbing across climbers?
10 A. That I did catch two people doing and they were told
11 about that, and that never happened again.
12 Q. Was one of those two people Mr Berry?
13 A. No, it was not.
14 Q. Were you ever aware of Mr Berry doing that?
15 A. No. No, I wouldn't have thought Grahame would've done
16 that. One thing is he doesn't like heights to do that
17 sort of thing.
18 Q. What about telling residents wrong or false information
19 about the cladding?
20 A. I don't believe that either.
21 Q. Mr Ben Bailey said he spoke to Mr Berry and said that
22 the behaviour was unacceptable. Were you aware that
23 that had happened?
24 A. I was aware of that. I was actually there when he spoke
25 to him.

205

1 Q. What was Mr Berry's response when Ben Bailey raised this
2 with him?
3 A. "I didn't do it", Bez said.
4 Q. So is it right that you didn't put in place any steps to
5 address this because you weren't satisfied that there
6 was anything to complain about?
7 A. Correct.
8 MS GRANGE: Mr Chairman, I've come to the end of my
9 questions.
10 SIR MARTIN MOORE-BICK: All right, thank you very much.
11 MS GRANGE: If we could have the customary break to allow me
12 to sweep up anything further, that would be great.
13 SIR MARTIN MOORE-BICK: Of course.
14 Well, Mr Osborne, as you have heard, counsel has
15 reached the end of the questions she had in mind to ask
16 you, but we normally have a break at this stage just to
17 allow counsel to check there aren't any questions that
18 have been left unasked, and it sometimes occurs that
19 people who are not here send questions in they would
20 like to have asked as well, so we have a 10/15-minute
21 break.
22 How long do you think you will need?
23 MS GRANGE: I think ten minutes should be fine.
24 SIR MARTIN MOORE-BICK: We will come back at 4.25, please,
25 and see if there are more questions.

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1 THE WITNESS: Thank you very much.
2 SIR MARTIN MOORE-BICK: Thank you very much.
3 (Pause)
4 4.25, then, please. Thank you.
5 (4.17 pm)
6 (A short break)
7 (4.27 pm)
8 SIR MARTIN MOORE-BICK: Right, Mr Osborne, shall we see if
9 Ms Grange has found some more questions for you?
10 THE WITNESS: Thank you.
11 SIR MARTIN MOORE-BICK: Yes, Ms Grange?
12 MS GRANGE: Yes, just a few short questions.
13 Just to clarify something about the scope of
14 Osborne Berry's work on the windows, is it right that
15 Osborne Berry did not install the actual fans in the
16 kitchen window units? Is that correct?
17 A. We didn't install them.
18 Q. Yes.
19 A. The electricians put them in the panels, then we
20 installed the panel into the window with the fan fitted
21 in it.
22 Q. I see. That's really helpful, thank you.
23 You were talking before about the fact that you had
24 made sure that the horizontal cavity barriers were
25 stored separate from the vertical cavity barriers.

207

1 A. Correct.
2 Q. Can you help us as to where exactly you had stored the
3 vertical cavity barriers on site?
4 A. Well, there was a -- I don't know what you would call
5 it, a garage. If you come into Grenfell Tower by the
6 front entrance, on the left-hand side there was two
7 garages.
8 Q. Yes.
9 A. We used the garage as a storage.
10 Q. Yes.
11 A. So we had one garage for us and we split it in half, and
12 we had one lot of stuff that side and one lot of stuff
13 that side, basically.
14 Q. Right, yes.
15 A. That's how they were individualised.
16 Q. And you remember splitting out the horizontal from the
17 vertical, do you?
18 A. Not being funny, the fitters should not -- this is --
19 I know after what we've seen, it's bad, but the fitters
20 should not have made the mistake, because one has got
21 an intumescent strip on it and it's so obviously
22 different from the other one. It's chalk and cheese,
23 basically.
24 MS GRANGE: Mr Chairman, those are all the questions.
25 SIR MARTIN MOORE-BICK: Good. Well, thank you very much.

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1 Well, Mr Osborne, thank you very much indeed for 211
 2 coming to give your evidence. It really has been very
 3 useful to hear what you have had to say. That's all we
 4 have for you, so you are now free to go. Thank you very
 5 much.

6 THE WITNESS: Thank you very much indeed.

7 (The witness withdrew)

8 SIR MARTIN MOORE-BICK: Good, thank you, Ms Grange.

9 MS GRANGE: That's okay.

10 SIR MARTIN MOORE-BICK: That's it for today.

11 MS GRANGE: Yes, and then tomorrow we have Mr Grahame Berry
 12 and Mr Mark Dixon.

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

14 Well, we will stop at that point and resume tomorrow
 15 morning at 10 o'clock, please. Thank you very much.

16 (4.30 pm)

17 (The hearing adjourned until 10 am
 18 on Tuesday, 29 September 2020)

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