

OPUS 2

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Grenfell Tower Inquiry

Day 30

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Thursday, 30 July 2020

1 (10.00 am)
 2 SIR MARTIN MOORE-BICK: Good morning, everyone. Welcome to
 3 today's hearing.
 4 Today we're going to hear from further witnesses who
 5 were employed by Rydon on the refurbishment.
 6 Yes, Ms Grange.
 7 MS GRANGE: Yes, thank you. If we could call
 8 Mr Gary Martin, please.
 9 SIR MARTIN MOORE-BICK: Thank you. Could you call
 10 Mr Gary Martin in, please.
 11 MR GARY MARTIN (affirmed)
 12 SIR MARTIN MOORE-BICK: Thank you very much, Mr Martin. Do
 13 sit down, make yourself comfortable.
 14 THE WITNESS: Thank you.
 15 SIR MARTIN MOORE-BICK: There is water there if you feel the
 16 need for it.
 17 THE WITNESS: Thank you.
 18 SIR MARTIN MOORE-BICK: Yes, Ms Grange.
 19 Questions from COUNSEL TO THE INQUIRY
 20 MS GRANGE: Yes, thank you.
 21 Good morning, Mr Martin. Thank you very much for
 22 attending today. It's very much appreciated.
 23 If you have any difficulty understanding anything
 24 I'm going to ask you in the course of my questions,

1

1 please ask me to repeat the question or put it in
 2 a different way.
 3 Also, if you feel that you need a break at any
 4 point, please just let us know.
 5 Can you also try and keep your voice up, because
 6 there is a transcriber to your right who is taking
 7 a note of your answers, so if you can keep your voice up
 8 for her, that would be great.
 9 Now, you have made one statement dated
 10 25 September 2018. Can I just take you to that. It's
 11 at {RYD00094216}. It's in a folder in front of you, and
 12 it will also appear on the screen.
 13 A. Yes.
 14 Q. Have you had a chance to read this statement recently?
 15 A. Yes, I have.
 16 Q. Great.
 17 Can you look at the bottom of page 2
 18 {RYD00094316/2}. Is that your signature?
 19 A. Yes, it is.
 20 Q. Great.
 21 Are the contents of the statement true, to the best
 22 of your knowledge?
 23 A. There's one misleading statement in there that I would
 24 just like to clarify before we start, and that is about
 25 the fire barrier around the windows.

2

1 Q. Yes.
 2 A. I confirm that there definitely was one, but I was
 3 referring to a paper foil barrier, not anything more
 4 substantial.
 5 Q. Right, yes.
 6 A. So it is misleading on there, but I need to confirm
 7 that.
 8 SIR MARTIN MOORE-BICK: Yes, thank you.
 9 MS GRANGE: Mr Martin, that's really helpful. I am going to
 10 come to that fairly quickly in my questions, and we're
 11 going to look at some photographs so you can show us
 12 hopefully what you were referring to in that part of
 13 your statement, but thanks for that.
 14 Can I start with some questions about your
 15 background and experience.
 16 Can we just look at paragraph 2 of your statement on
 17 page 1 {RYD00094216/1}. You tell us there that you're
 18 currently a site manager for a refurbishment company.
 19 You joined Rydon on 19 May 2014 and you left on
 20 12 January 2018, and you say:
 21 "Prior to this I was in the army for ten years;
 22 I then became a Marketing Manager based in Dubai and
 23 then for the ten years prior to joining Rydon I was a
 24 painter and decorator."
 25 Is that correct?

3

1 A. That's correct.
 2 Q. Is it right that your first role as site manager was on
 3 joining Rydon in May 2014?
 4 A. Yes -- no, I worked for a company called DW in Oxford
 5 where I was -- had several positions as site manager
 6 looking after refurbishments.
 7 Q. Yes, when was that?
 8 A. That was prior to joining Rydon.
 9 Q. Immediately prior?
 10 A. Immediately prior, yes.
 11 Q. So say 2013?
 12 A. Yeah.
 13 Q. Yes, that's helpful.
 14 You tell us in paragraph 3 that when you joined
 15 Rydon you were the lead site manager for a refurbishment
 16 project at the YMCA in Ealing, and then you tell us that
 17 you worked on the Grenfell Tower project between 31 July
 18 and 18 March 2016 as a site manager. We see that there.
 19 A. Yeah.
 20 Q. Now, prior to taking up your role as a site manager for
 21 the YMCA project, did you receive any training from
 22 Rydon prior to taking up that role?
 23 A. As a site manager, no, because that's an individual
 24 training agency that does that.
 25 Q. Right.

4

1 A. More specifically , yes, for first aid and those kind of
2 things.
3 Q. Yes.
4 A. So supportive roles.
5 Q. So when you say it's a training agency that does that,
6 does that mean that you yourself had undertaken some
7 training with a --
8 A. Yeah, there's a standard training to be a site manager.
9 Q. I see. And you have done that training?
10 A. Yes.
11 Q. Yes. Can you recall when you did that?
12 A. I -- it would have been about three/four years previous
13 to that, because I had to do a refresher going into it
14 because it runs out every five years.
15 Q. Can you recall whether that training covers the
16 requirements of the Building Regulations?
17 A. It mentions Building Regulations but it doesn't go into
18 detail.
19 Q. Yes.
20 Did you have any other training -- you talked about
21 first aid -- relevant to your role as site manager
22 before you took up the role of site manager on the
23 Grenfell project?
24 A. Not relevant to just Grenfell, no.
25 Q. Yes.

5

1 Now, in your role as site manager on the Grenfell
2 project, did you have a written job description?
3 A. No, I didn't, because the roles varied. I did probably
4 three or four different roles during that project.
5 Q. Right. Yes. But at no stage with any of those roles
6 did you have a written job description; is that correct?
7 A. Not that I recall.
8 Q. Yes.
9 Prior to the Grenfell project, did you have any
10 experience of overcladding projects?
11 A. No, but I didn't have any involvement with the
12 overcladding at Grenfell either.
13 Q. No, I appreciate you were looking at the internals and
14 the windows, but it touches on the overcladding,
15 obviously, because --
16 A. Right.
17 Q. -- there's new windows being installed, aren't there?
18 A. Yeah.
19 Q. Okay. But you nevertheless hadn't had any experience of
20 overcladding on other projects?
21 A. Yes, the YMCA at Ealing had cladding, but it wasn't over
22 18 metres, so --
23 Q. Right, yes.
24 A. -- it does vary slightly.
25 Q. And had you had any other experience with high-rise,

6

1 over 18-metre buildings?
2 A. No.
3 Q. Now, just looking in more detail at your specific role
4 on the Grenfell project, we've seen that you worked on
5 the Grenfell project as a site manager between
6 31 July 2015 and 18 March 2016; that's correct, isn't
7 it?
8 A. That's correct.
9 Q. Yes.
10 Can you just explain to us the hierarchy of site
11 managers on the Grenfell project, and who was
12 immediately senior or junior to you?
13 A. When I first came on board for the project, it was
14 Simon Lawrence as the contracts manager and
15 Simon O'Connor as project manager, and then Jason North
16 as site manager, and I came in after that. When they
17 both left, Dave Hughes came in as senior site
18 manager/project manager, if you like, and Steve Blake
19 took over as contracts manager.
20 Q. Yes, I see. So who was your direct line manager as
21 a site manager?
22 A. It was a dotted line into Dave Hughes and a solid line
23 into Steve Blake.
24 Q. Okay.
25 Just thinking about the chronology, we know that

7

1 Mr O'Connor left on 23 July 2015, and we know that
2 Mr Hughes didn't start until 20 October 2015, so there
3 was a gap there between July and October 2015.
4 Who did you understand to be the project manager
5 during that time?
6 A. Simon Lawrence --
7 Q. Simon Lawrence.
8 A. -- continued right the way through until Steve took
9 over, and Steve was coming up on site quite regularly at
10 that time.
11 Q. We know Simon Lawrence was the contracts manager; did
12 you also think he was the project manager during that
13 period?
14 A. He took on both roles during the interim.
15 Q. Yes. What about senior site manager during that time,
16 who was that?
17 A. There wasn't one that I recall.
18 Q. Okay.
19 A. Or it probably was Jason North, but I don't know whether
20 he was actually identified as senior site manager.
21 Q. Right.
22 A. But he took on that role.
23 Q. I see. So who would you be directly reporting to as
24 your line manager during that period?
25 A. Simon Lawrence --

8

1 Q. Yes.
 2 A. -- on site .
 3 Q. Yes.
 4 Looking back to paragraph 4 of your witness
 5 statement, you tell us there that your role on the
 6 project was to supervise subcontractors, their health
 7 and safety, the quality of their work and that the work
 8 was meeting the delivery programme. You see that there?
 9 A. That's -- yeah.
 10 Q. Had you received any particular training to supervise
 11 subcontractors?
 12 A. Only sort of ten years' experience in doing so.
 13 Q. Ten years' experience doing what?
 14 A. Managing subcontractors.
 15 Q. What was that experience?
 16 A. As a site manager prior to joining Rydons.
 17 Q. Right.
 18 A. As well as obviously the YMCA, which was the first
 19 project with Rydons.
 20 Q. Now, we know that Rydon was appointed on to the project
 21 in March 2014. In your role as site manager, were you
 22 provided with any information about Rydon's contractual
 23 obligations?
 24 A. Only having -- other than having the documentation
 25 on site to read through when I first started.

9

1 Q. Did you read through any of that?
 2 A. I did, yeah.
 3 Q. Can you remember what you read?
 4 A. The health and safety plan, construction phase plan, and
 5 there would have been a few other documents which
 6 I don't recall .
 7 Q. Do you think you would have read any of the employer's
 8 requirements, including maybe the NBS specification?
 9 A. No.
 10 Q. No.
 11 Did anyone at Rydon ever explain in general terms
 12 what Rydon's contractual obligations were on the
 13 project?
 14 A. Not directly , but it was something that was talked about
 15 obviously quite often, in that we had to meet those
 16 obligations on an ongoing basis .
 17 Q. Yes.
 18 At paragraph 14 of your witness statement
 19 {RYD00094216/2}, if we just have a quick look at that,
 20 you tell us in paragraph 14 that certain things weren't
 21 included in the contract. So you say:
 22 "Fire alarms sensors were installed ... in the
 23 communal areas but it was not in the refurbishment
 24 contract for Rydon to install fire alarms or sprinkler
 25 systems ..."

10

1 In the next sentence you also say it was not in the
 2 contract to install fire doors to the flats .
 3 So how, in practice , were you made aware of the
 4 matters which were within Rydon's contract and which
 5 were not?
 6 A. Just through the work we had to carry out. We had
 7 a specification of works to follow .
 8 Q. Yes. But which bits of that specification did you
 9 actually read or were told about on --
 10 A. I would have read through everything that was required
 11 to know what to implement.
 12 Q. I see, yes.
 13 SIR MARTIN MOORE-BICK: Was there a specification that was
 14 limited just to the particular areas that you were
 15 concerned with?
 16 A. Yes.
 17 SIR MARTIN MOORE-BICK: An extract, in a sense.
 18 A. I included those on there, because I do remember front
 19 doors, for instance, over a period of time since the
 20 building was built, tenants had changed their own doors
 21 and we didn't know whether they were fire rated or
 22 anything, but it didn't come under the contract, so we
 23 left them as they were.
 24 MS GRANGE: That specification you looked at, if it wasn't
 25 the NBS specification , can you remember what the

11

1 specification was?
 2 A. I can't, no.
 3 Q. Were you aware that Rydon was under a duty to complete
 4 the works in a proper and workmanlike manner and in
 5 accordance with good building practice?
 6 A. Most definitely , yes.
 7 Q. And also in compliance with statutory requirements,
 8 including the Building Regulations?
 9 A. Yes.
 10 Q. Yes.
 11 We have talked about the fact that part of your role
 12 was to supervise subcontractors and the quality of their
 13 work. Did you understand that this supervision would
 14 include ensuring that the subcontractors carried out the
 15 works in a proper and workmanlike manner, in accordance
 16 with good building practice and in compliance with the
 17 Building Regulations?
 18 A. Absolutely. Can I expand on that just a second?
 19 Q. Yes.
 20 A. I carried -- I devised a tracker, which was a large
 21 spreadsheet, with sign-offs for every single stage of
 22 the process, whether it be talking to the tenants prior
 23 to doing the work and explaining to them they need to
 24 move things, you know, a metre away from the walls to
 25 give us space to work, the TVs were working. They

12

1 signed it to say they were happy to go ahead. That was
2 with the RLO. We then went in, carried out the work and
3 the strip-out was done. Again, I got a sign-off from
4 the subcontractors. And when the work was carried out,
5 I signed it off, I got the tenants to sign it off to say
6 they were happy and the clerk of works also signed it
7 off, and it all went down on the tracker with the dates
8 relevant, so every flat was ticked off.

9 Q. We were going to come to that a bit later in your
10 evidence, but, actually, I'll take you to it now,
11 because clearly it's important for you to look at.

12 We think we found it: {RYD00070044}, and I think we
13 will need the native version.

14 A. That's the one.

15 Q. Great. So that is the tracker -- and we will come back
16 and look at this later again -- that you were completing
17 as the project went on; is that correct?

18 A. Yeah, I devised it from start to finish, yeah.

19 Q. And recording the work that was complete in terms of
20 different parts of the building.

21 A. Correct, and then this was to lead in to the health and
22 safety file and obviously the O&M manual.

23 Q. Yes.

24 If we could just look at some columns that appear in
25 the far right, there is a column AK and AL. Do you see

13

1 that on the far right-hand side, under the column
2 "Design"? It's the orange one.

3 A. Orange one, "Design" -- yes, and I'm not sure -- that
4 was a request of, I believe, the TMO to put that in, and
5 it wasn't for me to fill in.

6 Q. Right.

7 A. So I'm not quite sure what that represents.

8 Q. Yes.

9 Was the intention that that column would record
10 compliance with the employer's requirements and design
11 compliance?

12 A. I can't comment on that, I don't know.

13 Q. You don't know?

14 A. No.

15 Q. So you were asked to include this but that's not
16 something that you were filling in?

17 A. Yes, it was adopted -- the whole idea of doing this was
18 for the TMO to put the health and safety file together,
19 and it's something they want included, but as to why,
20 I don't know, because I never saw it filled in. I left
21 before the end of the project.

22 Q. Yes.

23 Then at column AE, which is headed, "TMO", we can
24 see some black dates, can you see that on the --

25 A. Yeah.

14

1 Q. -- third from left? That says clerk of works handover,
2 so is that the date that the clerk of works have
3 accepted the work?

4 A. Yes, they visited every single flat and signed it off.

5 Q. Yes.

6 So, just to be clear, when you were filling in your
7 sections of this, recording that the work was complete
8 in different areas, did you think that you were checking
9 that it was compliant with the Building Regulations?

10 A. I was checking that it was compliant with the works that
11 had gone previously, because I joined and the works had
12 already started. So, yes, I presumed it was. And we
13 had the Building Regulations(sic) come round with us and
14 we visited flats, and they didn't pick up anything so
15 I presumed it was compliant.

16 Q. Yes.

17 Just a couple of things on that. I think what
18 you're saying is that because you were checking that the
19 work was consistent with what had been done on site
20 before you got there, you assumed it was compliant?

21 A. Yes, everything had to echo -- we had a show flat and
22 everything had to echo the show flat precisely.

23 Q. Yes.

24 A. So the standards were approved there, so I presumed they
25 were approved everywhere.

15

1 Q. But you yourself didn't ever consciously think, when you
2 were checking individuals flats, "Right, I'm just
3 checking that this is compliant with the
4 Building Regulations"?

5 A. I was checking that the quality was of the same
6 standards that other flats --

7 Q. Yes.

8 A. -- had been made up to.

9 Q. I think what you said later in your other answer before
10 was that Building Control, or you meant to say
11 Building Control, came round --

12 A. Yeah.

13 Q. -- and they were happy; is that correct?

14 A. Yes.

15 Q. Again, we will come back to that.

16 Thank you for that, that's really helpful.

17 Just in terms of your knowledge at the time, did you
18 have a working knowledge of the requirements in the
19 Building Regulations at the time of the Grenfell
20 project?

21 A. Generally speaking, yes, but not in huge detail.

22 Q. Were you aware that the Building Regulations set down
23 functional requirements that had to be achieved?

24 A. Define?

25 Q. Sorry?

16

1 A. Can you define that for me?
 2 Q. Yes. A functional requirement is a kind of performance
 3 that is has to achieve at the end of the day.
 4 A. Yes, I was aware. Things like fire regs -- fire
 5 retardancy for doors, fire seals, smoke seals,
 6 et cetera, yes.
 7 Q. Did you know anything about the B4 requirement,
 8 "External fire spread", that the external walls should
 9 adequately resist the spread of fire over the walls and
 10 from one building to another?
 11 A. No, because, again, I wouldn't have involved myself in
 12 that because I wasn't looking after the externals.
 13 Q. Did you know anything about unseen fire spread and
 14 compartmentation?
 15 A. Yes.
 16 Q. What did you know about that?
 17 A. That each flat was its own fire compartment, and that
 18 firestopping -- and each floor was its own fire
 19 compartment as well, so firestopping was carried out
 20 between all floors and all flats and all entry points
 21 into the flats.
 22 Q. I see.
 23 We will come back to that a little bit more when we
 24 look at the windows.
 25 A. Yeah.

17

1 Q. At the time of the Grenfell project, were you familiar
 2 with any of the approved documents?
 3 A. Approved documents?
 4 Q. Yes. So under the Building Act, there is practical
 5 guidance that has to be given --
 6 A. Not precisely, no.
 7 Q. -- in relation to the Building Regulations.
 8 A. No.
 9 Q. That comes in the form of various approved documents.
 10 A. No, I wasn't, no.
 11 Q. So you hadn't ever considered something called Approved
 12 Document B on fire safety?
 13 A. No.
 14 Q. Were you aware in general terms that different rules
 15 applied to buildings over 18 metres at the time?
 16 A. Not at the time, no.
 17 Q. Had you ever heard of the phrase "limited
 18 combustibility"?
 19 A. I had heard the phrase, yes.
 20 Q. What did you think that meant?
 21 A. There's fireproof, fire retardant, and limited
 22 combustibility was the fact that it could catch fire but
 23 slowly. But I didn't have any concerns at the time
 24 because I didn't relate that to anything that was going
 25 on, because I had no specification -- no involvement in

18

1 the specification of materials.
 2 Q. Yes. Okay.
 3 Were you aware that cavity barriers had to be
 4 provided to close the edge of cavities, including around
 5 openings?
 6 A. Yes, but if you're talking about windows specifically,
 7 there was a barrier -- a foil and tape barrier placed
 8 around the whole window opening, and when I thought
 9 about -- it should be a fire barrier or shouldn't be
 10 a fire barrier, I checked with the drawings and asked --
 11 and I can't remember who I asked, but the comment back
 12 was that there was vertical and horizontal fire barriers
 13 continuing the compartment out through to the exterior
 14 cladding.
 15 Q. I see.
 16 A. So they weren't required around the window.
 17 Q. Were you specifically told that, that they weren't
 18 required --
 19 A. Yes.
 20 Q. -- around the window?
 21 A. Yeah.
 22 Q. Can you recall who might have told you that?
 23 A. I don't recall, but it prompted me to look at the
 24 drawings and there was nothing on the drawings to
 25 suggest that they should be.

19

1 Q. Do you think that it was somebody within Rydon that you
 2 would have spoken to?
 3 A. I honestly can't remember.
 4 Q. Is it possible that you spoke to someone outside Rydon
 5 about that question?
 6 A. It would have been three people: probably Taff from
 7 Harleys, it would have been probably Dave Hughes, it
 8 could have been Jason North, or it would have been the
 9 clerk of works. It would have been one of those people.
 10 Q. Okay, thank you.
 11 Now, just looking at paragraphs 5 and 6 of your
 12 witness statement, if we can go back to those on page 1,
 13 I think, {RYD00094216/1}.
 14 So you tell us that you oversaw the works to the
 15 interior of the flats, including, where relevant, the
 16 snagging and sign-off process.
 17 A. Yeah.
 18 Q. Then you talk about you were also involved in ensuring
 19 the pipes were fire sealed.
 20 Then you say in paragraph 6:
 21 "The sub-contractors I worked with included
 22 Hanley's ..."
 23 A. Meant to be Harleys, sorry.
 24 Q. That was my first question, so that was Harley:
 25 "... who were fitting the windows as part of the

20

1 exterior cladding; SD Plastering who were fitting a fire
 2 resistant seal between the window unit and internal sill
 3 as well as installing the UPVC window trim inside the
 4 flats ..."
 5 A. That's correct.
 6 Q. Then you talk about SD Carpentry, who were carrying out
 7 the boxing-in of the pipework.
 8 A. Yeah, that was more to do with the HIUs, the heat
 9 interchange units, and hiding the pipework through to
 10 the rads and kitchens.
 11 Q. Yes.
 12 Now, did you know that Harley were not in fact
 13 fitting the windows themselves and they had
 14 subcontracted that work out to Osborne Berry?
 15 A. I put Harleys down because I clumped them all together.
 16 To me, that was Taff. Taff was my main point of
 17 contact.
 18 Q. When you were working on the project, did you think Taff
 19 actually worked for Harleys or did you think he
 20 worked --
 21 A. I presumed he did, but clearly not.
 22 Q. So you didn't know at the time that Taff worked for
 23 a different company called Osborne Berry?
 24 A. No. They were subcontracted through Harley, weren't
 25 they?

21

1 Q. They were. But you didn't know that at the time?
 2 A. No. I may have done at the time, but I don't recollect
 3 it.
 4 Q. What did you understand Harley and Osborne Berry's work
 5 in terms of the windows to involve?
 6 A. Literally just fitting the external skin of the windows,
 7 and then the cill and trim work were to be done by
 8 SD Plastering.
 9 Q. Were you responsible for inspecting Harley's work on the
 10 windows and the window infill panels?
 11 A. No, just the windows themselves, that they were
 12 operational.
 13 Q. Yes.
 14 A. And then demonstrating the operational efficiency to the
 15 tenants and getting their sign-off with handbooks and
 16 manuals and bits and pieces. So it was mainly the
 17 internals and the handover to the client.
 18 Q. Yes.
 19 We can see, as we saw, that you start off
 20 paragraph 5 saying "I oversaw the works to the interior
 21 of the flats". Does that mean that you weren't ever
 22 involved in anything in terms of inspecting outside the
 23 building, from the outside in?
 24 A. No, I wasn't. No.
 25 Q. No.

22

1 At paragraph 10 {RYD00094216/2}, just to cover off
 2 that point, you say:
 3 "I did not have any involvement in the external
 4 works ..."
 5 What do you mean by external works there, do you
 6 mean --
 7 A. The cladding.
 8 Q. So -- yes.
 9 A. And the AOVs, which were the -- I can't remember what it
 10 stands for now, but basically the free flow of fresh air
 11 through the smoke -- taking the smoke out of each floor.
 12 So they were done by Dave Hughes.
 13 Q. Yes.
 14 A. So it's just the decoration, really, the firestopping.
 15 Q. Just to be clear in terms of Harley's work, did you ever
 16 think it was part of your role to be checking whether
 17 that work was compliant with the Building Regulations or
 18 associated guidance?
 19 A. No.
 20 Q. Who else in Rydon was responsible for checking for that,
 21 do you know?
 22 A. I would have thought Dave Hughes.
 23 Q. Did you understand that he was checking for that at the
 24 time that he was on the project?
 25 A. I worked with Dave on the YMCA project and know him to

23

1 be an extremely thorough person, so yes, I would expect
 2 him to have been all over it.
 3 Q. Now, I want to ask you some more detailed questions
 4 about the work of SD Plastering that we've referred to
 5 there.
 6 A. Yeah.
 7 Q. I want to take you first to the witness statement of
 8 Mr Mark Dixon of SD Plastering. If we can go to that,
 9 that's {SDP00000196/3}, paragraph 13. Just in that
 10 first sentence there he says:
 11 "In or around April 2015, I was asked by an employee
 12 of Rydon, whose identity I cannot recall with certainty,
 13 if SDPL would provide a quotation for undertaking
 14 cosmetic works in finishing off the surrounds to newly
 15 installed windows in each residential unit at the
 16 Grenfell Tower."
 17 Do you see that there?
 18 A. I do, yes.
 19 Q. Can you just help us, what was your understanding at the
 20 time of exactly what SD Plastering were doing?
 21 A. It was the uPVC trim around the windows and basically
 22 boards around the room, mainly cosmetic.
 23 Q. Yes. When you say "boards around the room", what do you
 24 mean by that?
 25 A. Erm ... there was a trim element that went around the

24

1 room completely, as well as the -- linked in to the
 2 window cills.
 3 Q. Right, okay. We're going to look at some photographs in
 4 a minute, so that might help you tell us.
 5 A. Okay.
 6 Q. If we look at paragraph 6 of your witness statement
 7 again, on page 1 {RYD00094216/1} of that statement, we
 8 can see that you say there in the second line:
 9 "... SD Plastering who were fitting a fire resistant
 10 seal between the window unit and internal sill as well
 11 as installing the UPVC ..."
 12 Do you see that there?
 13 A. Yeah.
 14 Q. I want to ask you some questions about this fire
 15 resistant seal.
 16 Can we look at an image from Dr Lane's report,
 17 {BLAS0000008/24}, and I want to zoom in on the image at
 18 the bottom of that page first, figure 8.25.
 19 What we see here is the window with that uPVC having
 20 been taken off; yes?
 21 A. Yes.
 22 Q. So am I right that this is what it would look like
 23 before SDP do any work on to the window; is that
 24 correct?
 25 A. That's correct, yes.

25

1 Q. So we can see that the new window is in there, the new
 2 window frame location, and we've got an EPDM
 3 weatherproof membrane that's been installed. That would
 4 all be done by Harley and its contractors.
 5 A. Correct, yeah.
 6 Q. With reference to this photo, can you just help us as to
 7 where this fire resistant seal is that you're referring
 8 to?
 9 A. It would have gone from the uPVC window on that little
 10 ledge inside right the way through to the front of the
 11 opening actually inside the flat.
 12 Q. Right.
 13 A. So it was a complete barrier right the way round.
 14 Q. What did that seal consist of, what materials was it
 15 made of?
 16 A. It was a silver foil and paper type material. I'm not
 17 sure of the specifications of it.
 18 Q. Right, okay. So something is going to sit in that gap
 19 to bridge that gap between the new window cill and we
 20 can see the old window cills, the wooden --
 21 A. Yeah.
 22 Q. -- at the bottom; is that correct?
 23 A. Correct.
 24 Q. What was your understanding of the purpose of that
 25 material in that location?

26

1 A. I wasn't 100% sure, but it was some kind of fire delay
 2 and smoke deterrent. Other than that, I didn't know.
 3 Q. How did you come by that knowledge, that it was some
 4 kind of fire delay and smoke deterrent?
 5 A. Process of elimination; it had to be there for a reason,
 6 otherwise we wouldn't have put it in.
 7 Q. I see.
 8 A. But I knew there the fire compartment went out as far as
 9 the outside cladding, so it didn't have to be
 10 a permanent barrier as such.
 11 Q. Did you ever ask anybody about the purpose of that fire
 12 resistant seal, as you have described it?
 13 A. No, I didn't, no.
 14 Q. No.
 15 A. It was already being fitted when I joined the project,
 16 so they just carried on being fitted.
 17 Q. So is it right that you have made an assumption that it
 18 was a fire resistant --
 19 A. Correct.
 20 Q. -- product?
 21 A. Yes.
 22 Q. But you didn't know for sure what that product was?
 23 A. No.
 24 Q. If we look at another photograph from Dr Lane's report,
 25 we will see the head of the window as well. So this is

27

1 {BLAS0000008/17} and I want to look at figure 8.15.
 2 So on the left-hand side, at the top, if we can zoom
 3 in on those two top photos. So left-hand side, we're
 4 seeing a very similar image -- perhaps even the same
 5 image -- to what we saw before in terms of the cill, but
 6 then on the right we can see the head of the window. Do
 7 you see that there?
 8 A. Yes, I do.
 9 Q. Is this fire resistant seal actually present there in
 10 the form of that bit of foam and the silver foil? Is
 11 that --
 12 A. That might be the remnants of it, certainly.
 13 Q. Yes. Is that what you remember it looking like,
 14 broadly?
 15 A. No. The inside was a sort of brown paper, cardboard
 16 effect, and then the outside was the foil. So it's
 17 obviously perished in the fire and that's the remains of
 18 it.
 19 Q. Yes.
 20 A. But that looks like it, yes.
 21 Q. Yes.
 22 Now, if you go to paragraph 12 of your witness
 23 statement {RYD00094216/2}, in that paragraph you mention
 24 a fire barrier. So in the last sentence you say:
 25 "A fire barrier was fitted around the window void so

28

1 there was no gap between the window unit and inner
 2 formed concrete sill ."
 3 A. That's the mesh I was talking about, yeah.
 4 Q. That's my point: is it exactly the same material that
 5 you were talking about earlier?
 6 A. Yes. That's the point I didn't want confused when
 7 I first mentioned it earlier .
 8 Q. Now, what we know from the post-fire inspections of the
 9 tower is that insulation board with a foil face was used
 10 to bridge the gap around the windows. Insulation was
 11 used all around the windows at cill , head and jamb
 12 positions .
 13 Is it right that you didn't know at the time that
 14 that was insulation board?
 15 A. I would have known it was insulation, but as to its
 16 other properties, I didn't know.
 17 Q. But you had made an assumption that there was some kind
 18 of fire purpose to it?
 19 A. Yes. Yes.
 20 Q. So just a couple of images. If we go again to Dr Lane's
 21 report --
 22 SIR MARTIN MOORE-BICK: Sorry, can I just interrupt you for
 23 a second.
 24 A moment ago you described this material as being
 25 a bit like paper on one side with a foil --

29

1 A. Correct.
 2 SIR MARTIN MOORE-BICK: -- face on the other.
 3 A. Yes.
 4 SIR MARTIN MOORE-BICK: Was it flexible or rigid?
 5 A. It was flexible .
 6 SIR MARTIN MOORE-BICK: All right, thank you.
 7 MS GRANGE: Can we look at Dr Lane's report again,
 8 {BLAS000009/6}, figure 9.3. I think that's probably
 9 actually the same image but we can see it a little bit
 10 more clearly.
 11 A. Yes.
 12 Q. What we see and what the post-fire inspection showed is
 13 that the original timber window linings were left in
 14 place, but then the gap between those at the head of the
 15 window and the new window frame was plugged with
 16 combustible insulation. Do you see that there?
 17 A. I do see it. I don't recognise it, but I do see it .
 18 Q. So that's not something you were familiar with?
 19 A. No. I don't remember any of the timbers being left in
 20 around the windows. But clearly they were, looking at
 21 the photograph here.
 22 Q. Do you actually have a recollection of timber window
 23 reveals being taken out and seeing them lying around?
 24 A. I don't remember, sorry.
 25 Q. Now, let's just look at another picture. This is at

30

1 cill level now. If we can go within Professor Bisby's
 2 report to {LBYS0000001/67}. So if we look at the top
 3 figure, figure 38, what Professor Bisby's done is give
 4 us a vertical section through a typical window cill,
 5 illustrating the material layout and the geometry. Do
 6 you see that there?
 7 A. I do, yeah.
 8 Q. What he has done is he has shown that underneath the
 9 uPVC window cill in the middle of the picture is a PIR
 10 foam insulation board, which has been stuck with
 11 adhesive to the uPVC window cill. Do you see that
 12 there?
 13 A. I do.
 14 Q. That's the only product that this expert found in that
 15 cill location. It also had an insulating board.
 16 Again, is that something you were aware of at the
 17 time of the project?
 18 A. No, my recollection is that this taped barrier went from
 19 the front of the cill right the way to the window, the
 20 uPVC window itself.
 21 Q. Right.
 22 A. Because there was no gaps once that had been done.
 23 Q. Yes.
 24 A. And that's what we had the clerk of works inspect to
 25 make sure there was no gaps.

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1 Q. On how many occasions do you think you saw that taped
 2 cill ?
 3 A. Every single window, because that was part of my
 4 sign-off .
 5 Q. Right. Is it possible that the insulation could have
 6 been underneath what you were looking at?
 7 A. No.
 8 Q. No? So you positively don't recall any foam insulation
 9 in that location?
 10 A. Sorry, the foam insulation could have been underneath
 11 the tape, but it was the tape I recall as part -- as the
 12 sign-off, the fact that the cavity was completely
 13 sealed.
 14 Q. I see.
 15 Can we look at a different cavity. This is the one
 16 between the window infill panels and the new window
 17 panel.
 18 If we look at Dr Lane's report, {BLAS0000008/20},
 19 figure 8.19. In that image at the top, what we see is
 20 a gap between the old window infill panel -- do you
 21 remember these were white panels on the tower when you
 22 looked from the outside?
 23 A. I didn't -- yes, yes, sorry.
 24 Q. So she is showing a gap between the old infill panel and
 25 the new infill panel, and we have quite a big gap there.

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1 Do you see that there?
 2 A. I do.
 3 Q. We can see in a number of images that insulation has
 4 been put down that jamb location at the side of the
 5 window.
 6 Was that something you were aware of?
 7 A. I don't recall seeing that.
 8 Q. Let's have another look at perhaps a better image. If
 9 we could look at {BLAS0000009/20}, figure 9.13, and if
 10 we can just zoom in on that.
 11 So, again, this is looking to the side, looking at
 12 the window infill panels from the opening. What we can
 13 see is that, on the left, there's combustible insulation
 14 filling the gap with a foil face on the top.
 15 A. Yeah, that's correct.
 16 Q. Do you see that there?
 17 A. Yeah.
 18 Q. Now, again, is that consistent with your recollection of
 19 what you saw at the time?
 20 A. Yes, that is, that's the stuff I was talking about
 21 earlier.
 22 Q. Great. So just to be absolutely clear, that is what you
 23 recall seeing at the cill location as well?
 24 A. Yes.
 25 Q. And at the head location?

33

1 A. And at the head location, yes.
 2 Q. Yes.
 3 Now, looking at these photos now -- so you can't
 4 quite see it, but that's in fact got a Celotex branding
 5 on it, that foil face. There's some red writing and you
 6 can just see the "ex". So what the experts found is
 7 that there was combustible insulation -- sometimes
 8 Celotex, sometimes Kingspan -- in those locations
 9 on site.
 10 Do you agree, looking at this now, that what you
 11 thought was a fire resistant seal or a fire barrier was
 12 actually that combustible insulation product?
 13 A. Yes.
 14 Q. I think we've established earlier that your evidence in
 15 your statement that it was a fire resistant seal or
 16 a fire barrier was merely an assumption you made.
 17 A. That's correct.
 18 Q. But nobody actually told you that on site; is that
 19 correct?
 20 A. I don't recall being told anything like that.
 21 Q. Were you responsible for inspecting the internal window
 22 reveals before the uPVC was installed?
 23 A. Yes, I was.
 24 Q. So you didn't just inspect once the uPVC was from place?
 25 A. No, it was inspected to make sure that that barrier was

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1 put in place.
 2 Q. When you were inspecting in that condition, so before
 3 the uPVC trim has gone on, what were you inspecting for,
 4 what were you looking for?
 5 A. Any gaps, make sure it was all fitted correctly.
 6 Q. Why were you concerned about gaps?
 7 A. Because I had been told to look out for gaps. Just to
 8 make sure that, you know, the work was done competently.
 9 Q. Yes.
 10 Does it follow from your answers that you didn't
 11 ever check for yourself whether the placing of this
 12 insulation board was compliant with the
 13 Building Regulations or any other industry guidance?
 14 A. No, I didn't, because it had already been started and
 15 I just took over the role.
 16 Q. Yes.
 17 During your work on the project, did you ever become
 18 aware of any problems concerning the extent of gaps
 19 between the edge of the old concrete window enclosure
 20 and the new window frames?
 21 A. As I mentioned earlier, I did look at the drawings and
 22 the drawings showed there was nothing to be put in
 23 there, because the fire compartment was actually around
 24 the outside -- the externals of the flats, to the
 25 cladding. So that would have been the fire barrier.

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1 Q. By that do you mean that on the external side of the
 2 window --
 3 A. Yes, yeah, I do.
 4 Q. -- there was a cavity barrier at compartment lines --
 5 A. Correct.
 6 Q. -- both horizontally and vertically?
 7 A. Yes.
 8 Q. But that wasn't immediately around the window, was it?
 9 A. No, it wasn't. No.
 10 Q. Now, just going back to paragraph 6 of your statement
 11 {RYD00094216/1}, you don't mention insulation in your
 12 description of the works, if we look at paragraph 6.
 13 I realise this is just a summary of who you were
 14 supervising, but nowhere there does it say insulation.
 15 Were you aware at the time that combustible
 16 insulation was being used around the windows at the time
 17 of the project?
 18 A. No, no, definitely not.
 19 Q. Now, I just want to take you to a quotation that was
 20 prepared by SD Plastering. This was dated 29 May 2015.
 21 For the transcript, we know that from Mr Dixon's
 22 statement at paragraph 30 {SDP00000196/6}.
 23 If we look at the quotation, if we can go to
 24 {SDP00000189}. If we could just blow that up, and blow
 25 up the top half of that quotation.

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1 So this was from SD Plastering, Mr Dixon speaks to
 2 it, and if you look in the second row, in "Description
 3 of item", there's words that say:
 4 "Place Celotex insulation to reveals and base of
 5 window."
 6 Do you see that there?
 7 A. I do, yes.
 8 Q. Now, do you recall ever seeing this quotation when you
 9 worked on the Grenfell project?
 10 A. No, definitely not. This would have been a document
 11 created back at tender stage.
 12 Q. Yes.
 13 A. And I didn't get involved in any of the pricing, so ...
 14 Q. Yes.
 15 Were you aware at the time -- I think it must follow
 16 from your answers that you weren't -- that the type of
 17 insulation was actually Celotex TB4000 insulation?
 18 A. No, I didn't get involved in that at all.
 19 Q. No.
 20 Interchangeably, there was also Kingspan Thermapitch
 21 TP10 that was also used around the windows. Were you
 22 ever aware of that when you were site manager?
 23 A. I knew it was being used, some form of insulation, but
 24 I didn't know what and what rating it was or anything
 25 else.

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1 Q. Yes.
 2 A. I had no details on it at all.
 3 Q. So you didn't ever see any branding on the foil face
 4 which told you --
 5 A. There would have been branding on, but I wouldn't have
 6 taken any notice of it because it wasn't part of my
 7 remit.
 8 Q. I see. So you wouldn't have been aware when the
 9 branding might have changed?
 10 A. I wouldn't have noticed, no.
 11 Q. So you weren't aware of anything about the fire
 12 performance of the Celotex insulation --
 13 A. No, not at all.
 14 Q. -- or the Kingspan insulation.
 15 Did you give Mr Dixon or anyone else within SDP any
 16 instructions with regard to compartmentation during your
 17 time as project manager?
 18 A. I wasn't project manager.
 19 Q. Sorry, during your time as site manager.
 20 A. Sorry, can you repeat the question?
 21 Q. Yes.
 22 Did you give Mr Dixon or any other representatives
 23 of SD Plastering any instructions with regard to
 24 compartmentation during your time as site manager?
 25 A. It didn't really fall under their remit. Most of the

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1 compartmentalisation that I was involved with was with
 2 JS Wrights putting the feeds for the HIU, the new
 3 heating system and hot water, into the flats above the
 4 front doors and find the ceiling (?) inside and out for
 5 them. So I didn't really get involved with that side at
 6 all, other than what we've already discussed, around the
 7 windows.
 8 Q. Did you have much direct interaction with SDP at all?
 9 A. Yes, yeah, I would speak to Mark every time he was
 10 on site and I worked very closely with his team.
 11 Q. What about instructions about materials or fire safety
 12 at any stage during the works? Did you ever have those
 13 conversations with SDP?
 14 A. No, everything was as per the show flat, so it was just
 15 mirror image in each flat.
 16 Q. Yes.
 17 Now, at paragraph 12 of your witness statement, if
 18 we could look back at that on page 2 {RYD00094216/2},
 19 you say:
 20 "Apart from the fire stopping work detailed above,
 21 I did not have any additional involvement with the fire
 22 safety aspects of the refurbishment; however, I do
 23 believe that fire safety was considered as part of the
 24 project."
 25 Do you see that there?

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1 A. I do.
 2 Q. On what basis did you believe that fire safety was
 3 considered as part of the project?
 4 A. Only that in meetings I had been a party to, everything
 5 else, there was a lot talked about it, but I didn't
 6 involve myself too much because it was the exterior, and
 7 on the interiors side, when I was looking after the
 8 communal areas, each floor, the fire rating of the
 9 materials we were using, ie paint, fire and smoke seals
 10 on doors, and that type of stuff.
 11 Q. So it's just because you were present at meetings when
 12 you --
 13 A. Yeah.
 14 Q. -- discussed --
 15 A. On a project like this, all the project managers, site
 16 managers, all sit in the same office, and conversations
 17 are bandied around across the room, so you do pick up
 18 an awful lot of information on a day-to-day basis.
 19 Q. Mr Martin, you are speaking quite fast.
 20 A. Sorry about that.
 21 Q. No, it's all good, but if you can just try and keep it
 22 slightly slower for the transcriber, that would be
 23 great.
 24 A. I will.
 25 Q. Did you yourself though ever involve yourself directly

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1 in any fire safety discussions with subcontractors?
 2 A. With the use of materials in the communal areas, using
 3 a Crown zero fire retardant paint on the walls was my
 4 only involvement I remember.
 5 Q. Right, yes. I understand.
 6 Can we look at paragraph 15 of your witness
 7 statement on page 2 {RYD00094216/2}. You say there, in
 8 the second sentence:
 9 "In my view, any building company realises that it
 10 has to comply with fire safety and as far as I was aware
 11 the refurbishment complied with building regulations."
 12 Do you see that there?
 13 A. I do, yeah.
 14 Q. Just the first bit, you say:
 15 "In my view, any building company realises that it
 16 has to comply with fire safety ..."
 17 One statement.
 18 A. As a prerequisite, yeah.
 19 Q. Then you say:
 20 "... as far as I was aware the refurbishment
 21 complied with the building regulations."
 22 Now, that last part, in what --
 23 A. I --
 24 Q. Sorry, if you just --
 25 A. Sorry.

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1 Q. In what ways did you take account of fire safety when
 2 you were doing your job?
 3 A. Take account -- I carried out my work as per all the
 4 guidance I had been given, as per specified drawings
 5 from Studio E and as per, you know, instructions for
 6 that work.
 7 Q. When you say, "as far as I was aware the refurbishment
 8 complied with building regulations", what did you base
 9 that on when you wrote that?
 10 A. I quite often escorted building safety around the
 11 building itself during their visits, because they had to
 12 be accompanied, and there was nothing ever picked up at
 13 the time, so I presumed that we were compliant. And
 14 most of those meetings with Building Control were Steve
 15 and Dave, at that level, so I didn't get too involved in
 16 that.
 17 Q. When you say, "I quite often escorted building safety
 18 around the building itself", do you mean
 19 Building Control?
 20 A. Yes, I do.
 21 Q. That's helpful.
 22 Can you help us as to why Rydon didn't give
 23 SD Plastering any instructions with regard to
 24 compartmentation, materials or fire safety before or
 25 during the carrying out of the works?

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1 A. I'm not sure what that relates to. Could you repeat
 2 that again, please?
 3 Q. Yes.
 4 Can you help us as to why Rydon didn't give
 5 SD Plastering any instructions with regard to
 6 compartmentation, materials or fire safety before or
 7 during the carrying out of their works?
 8 A. I'm sure they would have done, because as part of giving
 9 them a spec to carry out a body of work, they will have
 10 been briefed as to what materials and how to carry it
 11 out.
 12 Q. Was your assumption that they would have been briefed
 13 about the fire safety performance of those materials?
 14 A. I don't know, I don't know. That was, again, before my
 15 time. That would have been taken up pre-show flat.
 16 Q. But did you make that assumption when you were working
 17 on the project?
 18 A. I made that assumption, yes.
 19 Q. Now, just looking at paragraph 10 of your witness
 20 statement on page 2 {RYD00094216/2}, in the second
 21 sentence you say this:
 22 "In addition, I was not involved in fire strategy or
 23 in attendance at any meetings with the fire brigade."
 24 Do you see that there?
 25 A. I do.

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1 Q. Did you understand that there was a fire strategy for
 2 the works at Grenfell Tower?
 3 A. There's always a fire plan put in place for every
 4 project, as part of the health and safety file,
 5 construction phase plan.
 6 Q. Did you yourself ever come to look at the fire strategy
 7 during the course of your time on the project?
 8 A. I familiarised myself with the fire plan and I remember
 9 at the time thinking about stay-put policy -- I had
 10 never come across that before -- and thinking about that
 11 then. So, yes, I did.
 12 Q. Were you aware that Rydon's contractual documentation
 13 included an outline fire safety strategy that had been
 14 issued by Exova in November 2013?
 15 A. Yes.
 16 Q. Were you ever provided with that when you worked on the
 17 project?
 18 A. I had availability to it. All Rydon documentation is
 19 kept on the server and is available to look at at any
 20 time.
 21 Q. Do you recall actually looking at it at any time?
 22 A. I do, yes.
 23 Q. Did you notice that parts of it referred to an analysis
 24 in a future issue, that parts of it were incomplete?
 25 A. I don't recall that.

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1 Q. You don't recall that?

2 A. No.

3 Q. Perhaps let's just quickly look at that. If we go to
4 {CST00000702/9}. At the top of that page, there is
5 a section about compliance with B4, "External fire
6 spread". Do you see that there?

7 A. I do.

8 Q. It says there:

9 "It is considered that the proposed changes will
10 have no adverse effect on the building in relation to
11 external fire spread but this will be confirmed by an
12 analysis in a future issue of this report."

13 Do you see that there?

14 A. I do, yes.

15 Q. Do you recall reading that or noticing anything about it
16 during the project?

17 A. I did read it. It doesn't spring to -- it doesn't ring
18 any bells right now, but certainly at the time I read
19 through the document.

20 Q. Did you ever ask anybody anything about the future
21 analysis that had been promised in this part of the
22 report?

23 A. No. As I say, my role was really the internals, and the
24 fire compartments were pretty much, for want of a better
25 word, set in concrete, apart from the external barrier

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1 between the old concrete wall and the new cladding,
2 which was being looked after by another company.

3 Q. Yes.

4 Now, at paragraph 15 of your witness statement -- by
5 the way, I should say, we have just been told that some
6 of these bangs are to do with the building works that
7 are going on upstairs. Some of them are quite loud, but
8 it's nothing to be concerned about.

9 So at paragraph 15 -- sorry, actually, I've asked
10 you about this already.

11 (Pause)

12 I'm just looking at your questions because some of
13 your answers have avoided the need for me to ask.

14 A. Sorry, I've jumped round all over the place.

15 Q. No, it's good, it's good.

16 Just going back to the witness statement of Mr Dixon
17 of SD Plastering, {SDP00000196/7}, and I want to look at
18 paragraph 32 of his witness statement, you see there,
19 that's where, in the first subparagraph and the second
20 subparagraph, 32.1 and 32.2, he is confirming that it
21 was Celotex TB4000 and Kingspan Thermapitch insulation
22 boards.

23 Just to be clear, did you ever agree the use of the
24 Kingspan Thermapitch insulation boards around the
25 windows?

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1 A. No. As I say, all materials were qualified prior to my
2 starting.

3 Q. Did anybody ever tell you that the use of the
4 Kingspan Thermapitch insulation had been agreed?

5 A. Not that I can recall.

6 Q. Because it doesn't appear in the quotation from SDP that
7 we looked at previously, do you recall, where it just
8 talked about Celotex. We're just interested to know
9 whether you can help us as to whether somebody at Rydon
10 approved the use of that insulation around the windows?

11 A. I'm guessing that would have been done at tender stage.

12 Q. I think it follows from your earlier answers, but you
13 can't help us as to approximately how much of that
14 Kingspan Thermapitch was used around the windows because
15 you said you weren't concentrating on that; is that
16 correct?

17 A. I don't recall.

18 Q. Yes.

19 Now, just some further questions on the topic of
20 inspections.

21 Can you just explain how you understood Rydon to be
22 ensuring that work carried out by the subcontractors
23 complied with the design, the drawings, the
24 specifications and the Building Regulations?

25 A. It was my role to inspect it and make sure it complied

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1 with the drawings, and once that was done and the work
2 completed, then I would get the clerk of works at every
3 stage to sign it off to say they were happy with it on
4 behalf of the TMO.

5 Q. Does that mean you actually had drawings in your
6 possession that you were checking the works off --

7 A. They were available to us all on the server, Rydon's
8 server with all the documentation, plus we had hard
9 copies in the office.

10 Q. So in terms of the works around the windows, would you
11 have been looking at Harley drawings for that purpose?

12 A. I don't recall who produced the drawings, just that
13 I had a set of drawings.

14 Q. Right.

15 Did Rydon ever give you any written instructions in
16 relation to inspecting the works during the time you
17 were working on the project?

18 A. Just guidelines from whoever I took over from, I think
19 it was Jason North at the time.

20 Q. What did he say to you about that?

21 A. I don't recall exactly.

22 Q. Okay.

23 How did you know what inspections you should be
24 carrying out and what you should be looking for during
25 those inspections?

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1 A. Just for quality of work, breaks in the -- for the
 2 thermal lining, as we know it now, and the
 3 plasterwork -- not the plasterwork, the uPVC work
 4 around -- that it's fitted correctly, it's sealed, it's
 5 masticked in, and then obviously, following that, to
 6 demonstrate the windows and everything to the tenant and
 7 make sure they've got a manual and they sign for it. So
 8 we covered as much as we possibly could, and everything
 9 at every stage was signed for.
 10 Q. Yes, and it was predominantly focusing on the quality of
 11 the work; is that correct?
 12 A. Correct, yes.
 13 Q. Yes.
 14 Now, at paragraph 4 of your witness statement
 15 {RYD00094216/1} you have explained to us that there was
 16 a four-stage checkoff quality procedure that you
 17 applied, if we could look back at that. So we can see
 18 this first stage at (a) is:
 19 "Signed for by the tenant to say they were happy
 20 with the work and that they had been shown how to
 21 operate the windows and had received an instruction
 22 manual; and that the property had been left in a clean
 23 and tidy condition."
 24 A. Correct.
 25 Q. Then you say you signed a subcontractors' form to say

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1 that you were happy with the work, then properties were
 2 inspected by the clerk of works to sign off, and then:
 3 "All of these inspection reports were collated and
 4 recorded on a spreadsheet by me."
 5 A. Which has been known as the tracker ever since, yeah.
 6 Q. And that was the spreadsheet that I took you to at the
 7 beginning of your evidence?
 8 A. That's correct, yeah.
 9 Q. Great.
 10 A. There were additional checks as well. We did pre-visits
 11 with the -- with Lynda, who was the RLO, she had to be
 12 escorted, so it would be me, involving checking the TV
 13 works, that they could move their own furniture, if they
 14 needed help, and a lot of other bits and pieces involved
 15 in, and that explaining the process to the tenant as
 16 well.
 17 Q. Yes.
 18 Now, we get a little bit more detail about the
 19 sign-off and handover procedure for these internal
 20 windows in an email at {RYD00050849}. This is dated
 21 3 September 2015, if we can have a look at this, and
 22 blow up the top of it. So this is an email you send on
 23 that day to Jon White and Tony Batty. They're the clerk
 24 of works, aren't they?
 25 A. That's correct, yeah.

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1 Q. Copying in Simon Lawrence and others at Rydon. It's
 2 headed "Window handover procedure". Do you see that
 3 there?
 4 A. Yes.
 5 Q. You say:
 6 "Hi Jon, Tony
 7 "Simon has asked me to send you over a brief
 8 explanation for the sign off and hand over procedure for
 9 the internal fitting of the windows at Grenfell Tower."
 10 Do you see that there?
 11 A. I do.
 12 Q. Where did this procedure come from, who had given you
 13 these instructions?
 14 A. I don't recall. It's something I put together as: this
 15 is how we should be doing it, from experience more than
 16 anything else. There was no document to say: this is
 17 what you must do.
 18 Q. Yes.
 19 A. I wanted checks at every stage and a procedure that was
 20 then carried out with each flat.
 21 Q. Yes.
 22 A. So it's continuity.
 23 Q. Yes. And we can see you say at 1:
 24 "A window survey is carried out prior to any works
 25 commencing. This consists of a sign off sheet and the

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1 process being explained to the occupant ..."
 2 We see that there. Then at 2, you say:
 3 "Fitting lasts for two days and consists of ..."
 4 And you have put down what day one should involve
 5 and what day two should involve.
 6 A. Yes.
 7 Q. So it was a two-day process; is that correct?
 8 A. That's correct.
 9 Q. Would you be checking it after that day one, day two
 10 work had been done?
 11 A. Before and after every day, yeah, just to make sure it
 12 was left tidy and the tenant could get on with everyday
 13 life.
 14 Q. Within day one, we can see under (f) it says there:
 15 "Fitting and taping insulation around the window
 16 recess."
 17 Do you see that there?
 18 A. Yes.
 19 Q. Now, is that what we were discussing earlier?
 20 A. That is, yes.
 21 Q. So you did know at the time it was insulation?
 22 A. I guess so, yes.
 23 Q. But your evidence is you didn't know what type of
 24 insulation it was or anything about --
 25 A. I didn't know the qualities that product had. I've got

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1 it down here as insulation. This was written at the
 2 time, so I would have known about insulation, but
 3 I didn't know about any fire qualities or anything at
 4 the time.
 5 Q. Just to be clear, it was no part of your check to check
 6 whether there were any cavity barriers round the
 7 windows, was it?
 8 A. There was nothing on the drawings. I did check and
 9 I made -- I asked the question as well, and again I'm
 10 not sure who I asked, but I was satisfied that they
 11 didn't need to be put in place.
 12 Q. Were you aware in terms of your more general knowledge
 13 that there was a requirement for cavity barriers around
 14 windows in order to comply with the Building Regulations
 15 and other guidance?
 16 A. No, I wasn't.
 17 Q. So had you ever seen cavity barriers being installed
 18 around windows on other Rydon projects?
 19 A. No.
 20 Q. So the YMCA project that you did?
 21 A. Different sort of cladding.
 22 Q. Right.
 23 A. It was just fascia, not around the windows or any, so it
 24 was fitted in a slightly different manner. But, again,
 25 I didn't get involved with the fitting of that

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1 particularly much.
 2 Q. In your time as site manager prior to the Grenfell
 3 project, had you ever been involved in a project that
 4 had involved cladding around windows but not fitting
 5 cavity barriers?
 6 A. No, I hadn't.
 7 Q. Or fitting cavity barriers around windows?
 8 A. No, I hadn't.
 9 Q. No.
 10 Did you ever consider what material had been used to
 11 house the kitchen extract fans in the corner of the
 12 window panel?
 13 A. Material used to ...?
 14 Q. So in the corner of the kitchen windows --
 15 A. Yeah.
 16 Q. -- was a solid panel with a kitchen extract fan in the
 17 middle.
 18 A. Yes, yes.
 19 Q. Did you ever consider what that material was that went
 20 around the outside of that fan?
 21 A. No, no.
 22 Q. So does it follow that you didn't know that that
 23 material was a styrofoam extruded polystyrene cored
 24 material?
 25 A. Correct. It would have been what was used in the show

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1 flat, so ...
 2 Q. But you yourself didn't know what was --
 3 A. I didn't know, no.
 4 Q. -- inside that?
 5 A. Just from experience it would have been ... it would
 6 have been okay in the show flat to use it, so just to --
 7 a progression would be to carry on using it.
 8 Q. Yes.
 9 A. It would have been checked and signed off, I would have
 10 thought, because the show flat was handed over to TMO --
 11 Q. Yes.
 12 A. -- and they were happy with the quality and products.
 13 Q. Yes.
 14 Did anybody ever raise any concerns about the
 15 thoroughness of your inspections on site?
 16 A. No, not that I'm aware of.
 17 Q. Yes.
 18 Now, the second stage of the process that you
 19 described in paragraph 4 of your witness statement was
 20 about signing a subcontractor's and SD Plastering form
 21 to say you were happy with the work --
 22 A. Correct.
 23 Q. -- and it met the required standard. What did you
 24 consider to be the required standard?
 25 A. As per the show flat.

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1 Q. So you were constantly checking back to the show flat?
 2 A. Correct, yes.
 3 Q. Can we just look at the SD Plastering form. This is at
 4 {SDP00000194}, if we just blow this up.
 5 Is this the form that you were talking about?
 6 A. I don't recall it.
 7 Q. Can you recall what kind of information you would record
 8 on the SD Plastering form?
 9 A. I have vague recollection that it was a kind of a tick
 10 box: had this been done, had this been done to
 11 satisfaction, had this been done. Then once that was
 12 signed -- once I had signed that and happy with the
 13 quality, then obviously they would invoice against that
 14 amount of work being done.
 15 Q. Yes.
 16 Now, I just want to show you something that was said
 17 in the Rydon company witness statement. We have had
 18 a witness statement from Rydon as a company, as well as
 19 individual statements from former Rydon officers.
 20 If we can look at that, {RYD00094236/23}, and I want
 21 to look at paragraph 37. If I can just read this to
 22 you, it says here:
 23 "The role of [Rydon Maintenance Limited] site staff
 24 would be to coordinate subcontractors and to inspect the
 25 works in question from time to time, not to provide

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1 detailed supervision of subcontractors' works."
 2 Pausing there, do you agree with that statement?
 3 A. I do. Apart from the supervision of subcontractors'
 4 works. During that particular element of work, because
 5 we were working in tenants' homes, I was there more
 6 often, much more often, to make sure that the tenant was
 7 happy and not stressed or that, you know, work was tidy
 8 and there was no trip hazards, et cetera, et cetera, so
 9 from the health and safety side.
 10 Q. Yes. Then in the second sentence it says:
 11 "Any such inspections would be against the approved
 12 drawings and specifications and relevant Risk Assessment
 13 Method Statement ('RAMS') (where reviewed by [Rydon])."
 14 Do you see that there?
 15 A. I do, yes.
 16 Q. Again, do you agree with that statement?
 17 A. Yes, I do.
 18 Q. Now, was a risk assessment method statement available to
 19 you when you were inspecting the works to the interior
 20 of each flat?
 21 A. I don't recall, but I'm sure it would have been.
 22 Q. Can we just show you something to see if this prompts
 23 a recollection. If you look at {SDP00000198}, and just
 24 blow this up.
 25 Now, this seems to be the SDP risk assessment and

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1 method statement. Is that document familiar to you?
 2 A. It doesn't look familiar.
 3 Q. I see.
 4 A. But that's not to say I didn't read it four years ago.
 5 Q. No.
 6 What we see in the "Scope of Works" box towards the
 7 bottom of that page, it says:
 8 "Install and make good Flo Plast soffit and fascia
 9 board around window reveals. Board is to be cut and
 10 stuck using adhesive and all gaps made good with
 11 mastic."
 12 Do you see that there?
 13 A. Yes.
 14 Q. Was that your understanding of --
 15 A. Yes, it was.
 16 Q. Yes.
 17 Then if we could go on to page 3 {SDP00000198/3}
 18 there is a box for "Substances and Materials", if we
 19 could just zoom in on that box. There it says:
 20 "Flo Plast Soffit and Facias.
 21 "Grip Grab Adhesive.
 22 "735 Mastic."
 23 Do you see that there?
 24 A. I do.
 25 Q. Do you remember seeing that kind of list during the

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1 project?
 2 A. Yes, I do.
 3 Q. Did you or, to your knowledge, anyone else at Rydon take
 4 steps to examine the extent to which the materials or
 5 the methodology described in this method statement
 6 complied with the requirements of the
 7 Building Regulations or other relevant guidance?
 8 A. I didn't, because, as I say, it would have been used in
 9 the show flat and I would have thought it had been
 10 pre-adopted before my arrival.
 11 Q. Yes.
 12 Moving on, the third stage you described was that
 13 all properties were inspected by the TMO clerk of works.
 14 Now, the email that we looked at earlier which you
 15 sent to Jon White and Tony Batty referred to a sign-off
 16 sheet by the clerk of works, and I just want to take you
 17 to what we think is an example of that.
 18 A. Okay.
 19 Q. {RYD00050946}, and if we could blow that up.
 20 So we think this is an example of a clerk of works
 21 sign-off sheet for the project.
 22 A. This is, it is one I devised and it is my signature on
 23 there, yes.
 24 Q. Great, so that's exactly what you're describing in your
 25 witness statement, is it?

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1 A. Yes.
 2 Q. Can you just explain what this sign-off sheet is
 3 checking for?
 4 A. That the work has been carried out and there's no
 5 comment suggesting there's any fault with the work
 6 that's been carried out.
 7 Q. Was your understanding that the clerk of works would be
 8 inspecting in relation to the Building Regulations and
 9 any relevant guidance?
 10 A. I would have thought so, yes, because he's accepting the
 11 work for the TMO -- on behalf of the TMO.
 12 Q. Was that an assumption you made at the time?
 13 A. Yes.
 14 Q. Now, we see at the bottom that there's space there for
 15 the KCTMO rep -- do you see that in the middle at the
 16 bottom --
 17 A. Yeah.
 18 Q. -- to sign off.
 19 You explained in the email that was sent to the
 20 clerk of works that the form had been designed with
 21 a space for the TMO to sign after they have satisfied
 22 themselves that the work is of a suitable standard.
 23 Now, at what point would the TMO inspect and approve
 24 the works?
 25 A. They were given the opportunity at every stage.

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1 Jon White, the TMO clerk of works, or on behalf of TMO,
 2 was invited to come and have a look, and in most cases
 3 accepted and did inspect. But we would also get the
 4 tenant to say they're happy with the finish.
 5 Q. In the email you referred to them satisfying themselves
 6 that work was of a suitable standard. What did you mean
 7 by that?
 8 A. As per the show flat.
 9 Q. Yes.
 10 A. That it was neat, tidy and left in a good condition.
 11 Q. Did you yourself ever see any contractual documentation
 12 which set out what the scope of works was for the clerk
 13 of works?
 14 A. Not for the clerk of works, no.
 15 Q. Did you understand that the clerk of works would be
 16 doing any fire safety checks?
 17 A. They did. When I was looking after the communal areas,
 18 we went and signed off every single floor with all the
 19 risers coming through for the new heating system,
 20 because it hadn't been done previously, and they
 21 inspected and signed off every single floor.
 22 Q. Yes.
 23 A. And also they inspected where the pipework would go
 24 through above the door -- above the front doors into
 25 each flat / fire compartment.

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1 Q. Yes.
 2 A. That was done inside and out.
 3 Q. Just for completeness, you also explained in your
 4 statement there was a fourth stage, which was all the
 5 inspection reports -- these ones -- were collated and
 6 reported on a spreadsheet by you, and that's the
 7 spreadsheet we looked at earlier?
 8 A. That's the famous tracker, yeah.
 9 Q. Yes, great. I don't think we need to turn back to that,
 10 unless there is anything else you want to draw our
 11 attention to.
 12 A. On that -- yeah, I just want to go -- I know Simon, the
 13 project manager, Simon O'Connor, mentioned that the
 14 form-keeping wasn't very good within Rydons in his
 15 statement. I disagree with that completely. I think
 16 that tracker indicates that every single opportunity was
 17 taken and signed off at every level.
 18 Q. Just to be clear, was it any part of that tracker for
 19 Rydon to be confirming that the requirements of the
 20 Building Regulations or other guidance had been complied
 21 with?
 22 A. It all fed in to Building Control, that we had the
 23 electrical certificates, we had water tests for the
 24 temperature, and all the general forms, including this
 25 one in front of us. So it held pretty much all the

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1 paperwork for all the aspects of the work.
 2 Q. I see.
 3 But when you were putting that tracker together --
 4 I think I asked you this earlier -- were you ever
 5 independently thinking: does this comply with the
 6 Building Regulations?
 7 A. No.
 8 Q. Now, on the subject of Building Control, if we can go to
 9 paragraph 11 of your witness statement on page 2
 10 {RYD00094216/2}, you say there in the third sentence:
 11 "I was present for a couple of building control
 12 visits; no issues were raised and the decisions were
 13 documented."
 14 Do you see that there?
 15 A. Yes, I do.
 16 Q. Now, can you recall when those Building Control officers
 17 did visit?
 18 A. No. Not at this stage, no. It would have been just to
 19 literally show them around the building because they
 20 need to be accompanied at all times.
 21 Q. Can you recall which Building Control officers you met
 22 during those visits?
 23 A. No, I can't.
 24 Q. Did any of the visits involve looking inside the flats
 25 at, for example, the work done around the windows?

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1 A. I believe it did, yes.
 2 Q. Do you recall whether they actually looked at the area
 3 around the windows before the uPVC coverings, the trims,
 4 were put on?
 5 A. I don't recall that, but if they'd have come regularly,
 6 which I don't recall how regularly they did come, but
 7 they would have seen the windows at that stage, because
 8 obviously there was 120 flats to do.
 9 Q. Yes. Now, you state there, "the decisions were
 10 documented". Do you see that, towards the end --
 11 A. Yeah.
 12 Q. -- of paragraph 11? Sorry, it's not the final sentence,
 13 the penultimate sentence, "and the decisions were
 14 documented".
 15 I just wanted to ask you, what do you mean by that,
 16 what form of documentation was used?
 17 A. There was a report given at the project meeting.
 18 Q. Yes.
 19 A. The weekly project meeting.
 20 Q. Yes.
 21 A. Or monthly project meeting, with the TMO, and anything
 22 that was outstanding was raised.
 23 Q. Yes. I think we're going to come on to look at a couple
 24 of those in a moment.
 25 So at the progress reports meetings, you often get

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1 a section that explains whether Building Control have
 2 come and what they've looked at?
 3 A. Yeah.
 4 Q. Is that correct?
 5 A. We also bundle that in with any defects that have been
 6 reported from tenants or residents that I would
 7 completely list out and keep the TMO up to date with.
 8 Q. I see. So is that the only place we would find that, in
 9 those meeting minutes?
 10 A. It's the only place I ever recall seeing them. Whether
 11 there was a separate communication between Building
 12 Control and Rydon's at a higher level, I don't know.
 13 Q. Yes.
 14 A. I would've thought there would've been because, as I
 15 say, I was just showing them around the building, so it
 16 wasn't a ...
 17 Q. Yes.
 18 Did Building Control ever raise with you any issues
 19 in relation to the compliance of the works with
 20 Building Regulations or other relevant guidance?
 21 A. No, they didn't.
 22 Q. Did Building Control ever ask you what materials were
 23 being used around the windows, ie underneath the uPVC?
 24 A. No.
 25 Q. Did they ever ask you what materials were used to house

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1 the kitchen extract fans?
 2 A. No, they didn't.
 3 Q. Did they ever raise any concerns regarding
 4 compartmentation or fire safety in relation to the
 5 window materials or design?
 6 A. Not that I'm aware of, no.
 7 Q. Do you ever recall any discussions with them about the
 8 absence of cavity barriers around the windows?
 9 A. Not that I'm aware of, but I would have thought that had
 10 been picked up when they were inspecting the outside of
 11 the building.
 12 Q. Now, just looking back to something in the Rydon company
 13 statement at paragraph 518, this is {RYD00094236/195}.
 14 There it says:
 15 "Internal window components were installed between
 16 10 September 2015 and 12 November 2015. John Hoban of
 17 RBKC Building Control attended to inspect the Works on
 18 at least three occasions during this period - once in
 19 October and twice in November. [Rydon] is not aware of
 20 any adverse comments that were made in relation to the
 21 internal window installation works or the window
 22 surrounds on either of these occasions."
 23 Do you see that there?
 24 A. Yeah.
 25 Q. Now, do you agree with what's said there?

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1 A. I do. That report wouldn't have come to me anyway, so
 2 I wouldn't have had visibility, had there been
 3 a problem.
 4 Q. Do you have a recollection of Building Control actually
 5 inspecting the internal window surrounds during that
 6 period?
 7 A. I have recollection of taking them round, but not of
 8 what they were actually looking at at the time. They
 9 had free rein to look wherever they wanted.
 10 Q. I just want to take you to two of those progress report
 11 meeting minutes that you were referring to before.
 12 A. Yeah.
 13 Q. So if we can go to {RYD00054879}, this is the report
 14 number 16 for progress between, we see at the bottom of
 15 the page, 12 September 2015 and 16 October 2015. If we
 16 could go to page 10 {RYD00054879/10}, section 8, there
 17 it says:
 18 "1 no. visit in period - Paul Hanson (Fire Officer)
 19 discussions about AOV secondary supply and lobby riser
 20 cupboard design."
 21 Do you see that there?
 22 A. I do.
 23 Q. So there's nothing about the inspection of the windows,
 24 is there?
 25 A. No. This would have been a meeting with Dave Hughes,

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1 because he was looking after the AOVs.
 2 Q. Yes.
 3 A. And the riser cupboard design, most of the cupboards
 4 were already built -- well, they were already built
 5 prior to my joining the project.
 6 Q. If we go to just one more of these progress reports,
 7 it's at {RYD00057782}. This is for the period that
 8 follows this, for 17 October 2015 to 13 November 2015,
 9 and if we could go to page 11 {RYD00057782/11} and look
 10 at section 8 again, there it says:
 11 "2no. visit in period - John Hoban has visited twice
 12 in period to look at cladding. Generally happy with
 13 works except for minor quality issues with mastic &
 14 making good."
 15 Do you see that there?
 16 A. I do.
 17 Q. Looking at that now, it refers to "visited twice ... to
 18 look at cladding". Do you think that John Hoban looked
 19 at the windows and the internal windows during that
 20 period?
 21 A. He may have inspected the -- or the gap from the
 22 outside, but I believe that would have been from the ...
 23 from the exterior.
 24 Q. Yes. So these two progress reports don't suggest, do
 25 they, that there was an inspection of the windows?

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1 A. They don't, no.
 2 MS GRANGE: Mr Chairman, I am nearly at the end of my
 3 questions, but I have three very short topics to go.
 4 I'm happy to break now.
 5 SIR MARTIN MOORE-BICK: How long do you think you might need
 6 to cover those?
 7 MS GRANGE: I think it will take ten minutes. We could
 8 break now, but we will have to have another break to
 9 sweep up the final questions.
 10 SIR MARTIN MOORE-BICK: I was wondering whether we could
 11 conflate the two breaks, but that might be a bit
 12 ambitious, might it?
 13 MS GRANGE: It depends whether people are happy to go on.
 14 SIR MARTIN MOORE-BICK: You would probably like to have
 15 a break at this stage, wouldn't you?
 16 THE WITNESS: I'm okay.
 17 SIR MARTIN MOORE-BICK: I am sure the shorthand writer
 18 would, but she is too polite to say so.
 19 All right, we will take a short break now, then.
 20 While you're out of the room, please don't talk to
 21 anyone about your evidence or anything else to do with
 22 the refurbishment.
 23 THE WITNESS: Okay.
 24 SIR MARTIN MOORE-BICK: We will resume at 11.35, please.
 25 THE WITNESS: Thank you.

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1 SIR MARTIN MOORE-BICK: If you would like to go with the
 2 usher, she will look after you.
 3 (Pause)
 4 Right, 11.35, please.
 5 MS GRANGE: Thank you.
 6 (11.22 am)
 7 (A short break)
 8 (11.35 am)
 9 SIR MARTIN MOORE-BICK: Right, Mr Martin, ready to carry on?
 10 THE WITNESS: Yes, indeed.
 11 SIR MARTIN MOORE-BICK: Yes, Ms Grange.
 12 MS GRANGE: Thank you, yes.
 13 Just a few follow-up questions from your evidence
 14 this morning and then I will carry on with my remaining
 15 topics.
 16 I asked you about cavity barriers around the
 17 windows, and I asked you a question -- I said:
 18 "Question: Just to be clear, it was no part of your
 19 check to check whether there were any cavity barriers
 20 round the windows, was it?
 21 "Answer: There was nothing on the drawings. I did
 22 check and I made -- I asked the question as well, and
 23 again I'm not sure who I asked, but I was satisfied that
 24 they didn't need to be put in place."
 25 I asked you a few more questions about that, but the

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1 question I want to ask you now is: what was it that
 2 prompted you to ask about cavity barriers round the
 3 windows, particularly given you said you hadn't ever
 4 seen cavity barriers round the windows on other
 5 projects?
 6 A. Just because it was a bit odd to see a gap, purely
 7 inquisitive -- being inquisitive, really.
 8 Q. Did you know that there was a thing called a cavity
 9 barrier around the window?
 10 A. No, I didn't.
 11 Q. No. So what would have been the question that you
 12 asked, when you asked it?
 13 A. I don't recall, just that from a fire -- thinking about
 14 the compartmental element of the actual flats, that
 15 there needed to be something there, and I was assured
 16 that it was between floors and on the verticals.
 17 Q. Yes.
 18 A. So that then satisfied my instinct that there was
 19 a barrier.
 20 Q. Yes.
 21 A. The compartment was extended to the cladding.
 22 Q. Just back to the questions I asked you about
 23 Building Control, can we just be clear, what did you
 24 understand your role to be when Building Control
 25 visited?

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1 A. As a chaperone only on site.
 2 Q. Right.
 3 Now, we looked at the materials around the window
 4 and you accepted that you didn't know that it was
 5 a Celotex product or a Kingspan product used around the
 6 windows.
 7 Was not knowing what materials were being used
 8 normal in relation to Rydon projects?
 9 A. Probably not, but as I took over halfway through the
 10 project, it was already being used, I wouldn't have then
 11 investigated any further.
 12 Q. I see, yes.
 13 A. I'm sure during the prep phase Rydons would have done it
 14 because they were very detailed with their research.
 15 Q. Had you wanted to check whether or not those materials
 16 should have been used, who would it have been within
 17 Rydon that you would have asked?
 18 A. Probably Zak Maynard.
 19 Q. Why would you have asked him?
 20 A. Because he specified the material -- I guess he would
 21 have had a big input on choosing what products was used.
 22 Q. What gave you the impression that that was Zak Maynard's
 23 role?
 24 A. Just because I had gone to him for information in the
 25 past and he was very helpful, so he would be my first

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1 port of call for something like that.

2 Q. I see, yes.

3 Now, I want to ask you some questions about health
4 and safety information, the health and safety file.

5 Were you aware that it was Rydon's duties under
6 regulation 38 of the Building Regulations to provide
7 relevant fire safety information to the TMO on
8 completion of the works?

9 A. I was aware, yes.

10 Q. What role, if any, did you play in relation to that?

11 A. Very little, other than the firestopping side of things
12 on the communal areas and into the fire compartments of
13 the flats, and from the tracker, which I think it's
14 Neil Reed from Artelia commented on that was coming
15 together nicely, he was actually helping add columns to
16 it that they wanted to know so they could put the health
17 and safety file together.

18 Q. I see. Can you remember when you had those discussions
19 with Mr Reed?

20 A. It would have been at one of the weekly meetings,
21 project meetings.

22 Q. Do you think in 2015 or 2016?

23 A. I don't recall.

24 Q. No.

25 We know that All Group Holdings was subcontracted by

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1 Rydon to prepare the building manual and help with the
2 health and safety file for the project.

3 Do you know whether it was intended that the
4 building manual would include the relevant fire safety
5 information required by regulation 38 of the
6 Building Regulations?

7 A. I presume so. I don't know. As I say, I had left the
8 project prior to all that information going to the third
9 party that we brought in to write the O&M manual.

10 Q. So were you involved at all in supplying All Group
11 Holdings with any information to include in the building
12 manual and the health and safety file?

13 A. Yes, all the information on the tracker was backed up
14 with all the certificates and documents that were
15 scanned and foldered and on the RMS Rydon system.

16 Q. How did you understand what kind of documents All Group
17 Holdings might need in order to prepare the health and
18 safety file?

19 A. They would get in touch with me and ask me what type of
20 documents, and also I kept everything.

21 Q. So those exchanges with All Group Holdings, were they on
22 the telephone, by email?

23 A. It would have been on the telephone, yes.

24 Q. So, what, they called you and said, "We need X, Y, Z"?

25 A. If they'd have wanted anything, yes, they'd have done

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1 that. I don't recall instances.

2 Q. You don't recall instances?

3 A. No.

4 Q. No.

5 How did you know what information you ought to be
6 getting ready for the health and safety file?

7 A. I've had experience in the past of doing similar jobs.

8 Q. Yes.

9 A. So that and I basically collected everything, so I got
10 a sign-off at every single level, because I knew it
11 would feed into that file.

12 Q. Yes.

13 Now, if we can look at an email that you sent,
14 {RYD00071352/3}. We can see at the top of that page
15 that on 26 February 2016 you emailed Sonia Angele of
16 All Group Holdings, and you say:

17 "Hi Sonia

18 "Following our conversation earlier please find
19 attached the project document tracker with the files we
20 have collated to date."

21 Do you see that there?

22 A. I do.

23 Q. Then if we go to that tracker, this is at {RYD00069121}.
24 If we can look at the native version. I think we may be
25 looking at the same document we looked at earlier.

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1 There we go. So that's the project tracker we looked at
2 earlier. Yes?

3 A. Correct, yeah.

4 Q. Now, why did you think the information in this tracker
5 would help them compile the health and safety file?

6 A. I was just aware that they wanted all the information
7 that we had available.

8 Q. Isn't this primarily a project planning spreadsheet for
9 Rydon to keep track of what works were complete? How
10 would this feed into the health and safety file?

11 A. It started off as that, and then Neil Reed from Artelia
12 started adding bits that they wanted and other bits that
13 other people wanted, so it became slightly more.

14 Q. Yes.

15 A. And then obviously we sent all information over to do
16 the O&M manual.

17 Q. I see.

18 One of the Inquiry's experts, Dr Lane, has said that
19 the only document in this tracker that's relevant to the
20 health and safety file is the asbestos report, which we
21 can see at column Y. Do you see there at the top in
22 that red section it says "RML asbestos", do you see that
23 there?

24 A. I don't.

25 SIR MARTIN MOORE-BICK: Just to the left of the vertical

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1 black columns.
 2 MS GRANGE: That's a bit better.
 3 A. Oh, okay, yeah, sorry.
 4 Q. Do you see there, there is a column for asbestos
 5 reports?
 6 A. Yes.
 7 Q. And that's been completed, and Dr Lane said that would
 8 have been relevant to the health and safety file, but
 9 only that.
 10 Was that your understanding, or did you think --
 11 A. I wasn't aware, the health and safety file, what exact
 12 documents it required because I had never written one.
 13 Q. You had never been involved in one before?
 14 A. No, no. This was all supplementary documentation to
 15 help with the O&M and then feed into -- what was
 16 required to feed into it. There were several pages,
 17 there's firestopping, deliverables, and also for the
 18 mechanical engineering and electrical works as well.
 19 Q. Yes.
 20 Before you sent it over, did you check that all the
 21 information contained in, for example, that column Y was
 22 accurate?
 23 A. I believe so, yes.
 24 Q. If we can just look at an example. If you go to row 87,
 25 which is the row for flat 91, if we can look down

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1 the ... there we go. So that's row 87 there. Do you
 2 see in column Y on the far right-hand side it says
 3 "N/A" -- is that not applicable? -- for asbestos report.
 4 A. Correct.
 5 Q. We think we may have found an asbestos report for that
 6 flat, flat 91. Can we go to {MAX00000049}. This is
 7 what we think is an asbestos report for 91
 8 Grenfell Tower. Do you see that there?
 9 A. I do.
 10 Q. Can you help as to why the spreadsheet might not have
 11 recorded that in it?
 12 A. I wouldn't have been aware of it, that's the only reason
 13 it wouldn't have been on there.
 14 Q. I see. So someone didn't pass you this asbestos report?
 15 A. Correct.
 16 Q. Is that what you are saying?
 17 A. Yes.
 18 Q. Whose responsibility would it have been to do that?
 19 A. I don't know. Because it was a fluid document, and
 20 built up over a long period of time, it overlapped sort
 21 of two project managers and senior site managers, so
 22 there was a raft. So it should have been brought to my
 23 attention when I was putting it together, but I don't
 24 remember it having been so.
 25 Q. Yes, I understand.

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1 Can we look at an email chain now, {RYD00072822}.
 2 So this is an email chain between David Hughes of Rydon
 3 and Steve Butler of All Group Holdings. Do you see that
 4 there?
 5 A. I do.
 6 Q. I'm looking at the second email down, David Hughes to
 7 Steve Butler, 1 April 2016, and he says:
 8 "Hi Steve
 9 "How are you getting on with the [health and safety]
 10 file /O+M manual ..."
 11 Then in the third paragraph, he says:
 12 "I feel it would be worthwhile for you to visit site
 13 for a quick meeting."
 14 Do you see that there?
 15 A. I do.
 16 Q. Do you remember attending that meeting?
 17 A. I don't, no.
 18 Q. So you can't help us as to what was discussed?
 19 A. I can't, no. I believe I was, but I do not remember the
 20 contents of the meeting itself.
 21 Q. You will see in the second paragraph he says:
 22 "I neglected to say that we have a number of folders
 23 onsite that Gary Martin started to compile - these
 24 contain the majority of certificates & sign off sheets
 25 for the occupied units."

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1 Do you see that there?
 2 A. I do. They would have been the hard copies of all
 3 the -- for want of another way of putting it, soft
 4 copies that were then attached to the spreadsheet.
 5 Q. I see. So all the sign-off sheets that lead into that
 6 tracker spreadsheet is what's being referred to there?
 7 A. Yeah, all the hard copies in separate folders.
 8 Q. Were All Group Holdings actually provided with those
 9 folders of information?
 10 A. They were provided with the soft copies, so --
 11 Q. I see.
 12 A. Yeah, there would have been a Dropbox set up and they
 13 had them all available.
 14 Q. Did you take any further steps to ensure that relevant
 15 fire safety information was properly collated and passed
 16 on to All Group Holdings?
 17 A. Only the information that I was given at the time. So
 18 if I was passed any information, it would have been on
 19 that document.
 20 Q. It would have been on the tracker --
 21 A. Yes.
 22 Q. -- and then going forward? I see.
 23 Do you know who else within Rydon was responsible
 24 for providing All Group Holdings with documents relevant
 25 to the compilation of that file?

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1 A. Ultimately on site it would have been Dave Hughes,
 2 I guess. I know he had several meetings regarding the
 3 documents and bits and pieces and fire strategy, but as
 4 to exactly what, I don't know.
 5 Q. Yes.
 6 Did you ever take any steps yourself to ensure that
 7 the building manual was completed and passed on to the
 8 TMO?
 9 A. No, I left the project before that happened.
 10 Q. Yes.
 11 Did you check the building manual yourself to see if
 12 it was complete and accurate?
 13 A. Up to the stage when I left the project, yes, it was.
 14 Q. I see.
 15 Did you check the health and safety file to see if
 16 that was complete and accurate?
 17 A. No, that was after my time.
 18 Q. Yes.
 19 A. I was under the impression that the TMO was putting that
 20 together and we were just doing the O&M.
 21 Q. Yes, so you wouldn't have done any further checks --
 22 A. No.
 23 Q. -- on the health and safety file?
 24 A. No.
 25 Q. Just another topic about management and the presence of

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1 management on the site.
 2 Can we just go to some meeting minutes from
 3 21 August 2015, this is at {RYD00049916}.
 4 Now, this was a meeting held on 21 August. It was
 5 a subcontractor progress meeting minutes and it says
 6 "Windows", do you see that there?
 7 A. I do.
 8 Q. We can see you're present, and at the bottom of that
 9 list it says that you chaired the meeting and you took
 10 the minutes.
 11 A. Yes, I did, yeah.
 12 Q. Do you see that there? We can see that Simon Lawrence
 13 is under the apologies section. Do you see that there?
 14 A. I do.
 15 Q. Now, can you recall whether Simon Lawrence had been
 16 expected to attend that subcontractor progress meeting?
 17 A. Normally I would expect him to, yeah.
 18 Q. Did you deputise for him when you were chairing this
 19 meeting?
 20 A. No. These meetings were my own way of keeping in touch
 21 with the subcontractors, exactly what they were doing,
 22 so everything works in a timely fashion.
 23 Q. When you were attending subcontractor meetings like
 24 this, did you expect a senior member of Rydon to be
 25 there, such as Simon Lawrence or Mr Blake?

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1 A. No, not necessarily.
 2 Q. And why was that?
 3 A. It's always nice when they could, but it was really for
 4 me to go through any outstanding points that I had with
 5 the subcontractors' work to make sure the standards were
 6 maintained and it complied with drawings and
 7 expectations.
 8 Q. Yes.
 9 Would the minutes of these meetings have gone to
 10 Simon Lawrence --
 11 A. Yes.
 12 Q. -- routinely? Yes.
 13 Looking at item 5.02 on page 2 {RYD00049916/2},
 14 there's a reference here that Mr Lawrence was asked
 15 about. It says:
 16 "Now that we are getting towards the end of the
 17 programme we will need to make more and more
 18 appointments with tenants. We need to increase our
 19 levels of courtesy to allow this to happen smoothly."
 20 Do you see that there?
 21 A. I do.
 22 Q. Can you recall what was meant by that last sentence
 23 about courtesy needing to be increased?
 24 A. I don't recall in what context that was said like that.
 25 Q. So you can't recall who said that at the meeting?

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1 A. No.
 2 Q. Had there been any problems, so far as you were aware,
 3 with levels of courtesy up to that time?
 4 A. Far from it. Lynda, the RLO, and Christina, the RLO,
 5 were excellent with the tenants at all times, I can't
 6 fault them at all, the best I've ever worked with.
 7 Myself and Chris Holt also would have accompanied them
 8 to every visit, obviously lone workers and everything
 9 else, we would be with them to explain processes and
 10 everything else, so ...
 11 Q. Were you ever aware of any problems with workmen and the
 12 residents on site?
 13 A. No, I wasn't. We would keep them in sort of tight
 14 control with -- because when they were cutting the
 15 boards for the window cills, they only had the communal
 16 area outside four flats per floor to work. Therefore,
 17 they had to be kept in tight control, otherwise they
 18 would spread out and cause trip hazards and other bits
 19 and pieces, so ...
 20 Q. Were you ever aware of any problems with workmen being
 21 rude to residents?
 22 A. There may have been instances, but they would have been
 23 dealt with quite severely at the time. I don't recall
 24 individual instances.
 25 Q. Okay.

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1 Did you discuss this minute with anyone after the
 2 meeting?
 3 A. Not that I'm aware of.
 4 Q. So you don't recall discussing it with Simon Lawrence?
 5 A. No.
 6 Q. No.
 7 My last topic: floor numbering.
 8 A. Yes.
 9 Q. Can I take you to a document, {RYD00059989}, and I want
 10 to go to the second email down in the chain on page 1.
 11 So this is from you to Claire Williams on
 12 2 December 2015, and you say:
 13 "Hi Claire
 14 "New floor numbers have been put up on the riser
 15 doors on each floor complete with individual flat
 16 numbers and a directional arrow to show which direction
 17 they are in on exiting the lifts .
 18 "I have also to a 'master' sheet up in the lobby of
 19 the second floor .
 20 "Also the now incorrect floor numbers in the
 21 stairwell have been obliterated and I will put some
 22 temps up in there also ."
 23 Do you see that there?
 24 A. I do.
 25 Q. Now, can you help us as to what precisely you did in

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1 relation to the floor numbering before you left the
 2 project?
 3 A. Yes. The old floor plans had changed completely because
 4 we added four floors at the bottom.
 5 Q. Yes.
 6 A. So everything was bumped up four floors. So new signage
 7 was created, firstly temporary signage to clarify , had
 8 there been a problem, then it was very clear exactly
 9 where the flats were and where exits were. On the
 10 stairwells there was a stencilled number on each floor,
 11 and that was over-stencilled with the new correct
 12 number.
 13 Q. Was that done with paint and a stencil?
 14 A. Yes, it was, yeah. Originally it was going to be done
 15 as a temporary sign, but it was stencilled over as
 16 a finished project.
 17 Q. You oversaw that work, did you --
 18 A. Yes, I did.
 19 Q. -- before you left?
 20 A. Yeah. And the other one on the second floor was
 21 referring to an overview of what flats are on what floor
 22 now for guidance when you're first entering the
 23 building.
 24 Q. When you left the site , was it your understanding that
 25 there was clear floor numbering on the stairs?

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1 A. Yes, the new signs had been printed and had been put up.
 2 Q. How big were these floor numbers that you put on?
 3 A. There was a lot of debate and conversation went into it ,
 4 because originally the TMO wanted braille as well. So
 5 from those conversations I know they met all the
 6 criteria that the TMO put down and industry standards.
 7 Q. But, approximately, can you remember, what size were
 8 they?
 9 A. No, I can't give you dimensions, but they were quite
 10 big. They were very, very clear .
 11 Q. Then finally in terms of my questions, we know you left
 12 the project on 18 March 2016. Do you know why you were
 13 withdrawn from the project at this time?
 14 A. The project was winding down, so there wasn't that much
 15 work. We had done most of the internals , the paintwork
 16 and boxing of all the pipework for the HIUs had been put
 17 in place and all signed off, all the window work had
 18 been completed and the communals had been finished, so
 19 there wasn't a lot left to do. So a skeleton staff of
 20 Jason and Dave Hughes and Steve Blake completed the
 21 final bits of the project .
 22 MS GRANGE: Great, thank you.
 23 Mr Chairman, those are all my questions.
 24 SIR MARTIN MOORE-BICK: Right, thank you.
 25 MS GRANGE: If we could have perhaps a ten-minute break.

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1 SIR MARTIN MOORE-BICK: I was going to suggest 12.10, would
 2 that be sensible?
 3 MS GRANGE: That's fine.
 4 SIR MARTIN MOORE-BICK: Mr Martin, although Ms Grange thinks
 5 she has reached the end of the questions, we need to
 6 have a short break to take stock and so on.
 7 THE WITNESS: Okay.
 8 SIR MARTIN MOORE-BICK: So we will stop now until 12.10, and
 9 then I will ask you to come back and see if there are
 10 any more questions we need to put to you.
 11 THE WITNESS: Of course.
 12 SIR MARTIN MOORE-BICK: So, please, no talking to anyone
 13 about your evidence.
 14 If you would like to go with the usher, please.
 15 THE WITNESS: Thank you.
 16 (Pause)
 17 SIR MARTIN MOORE-BICK: Right, 12.10, please.
 18 MS GRANGE: Thank you.
 19 SIR MARTIN MOORE-BICK: Thank you.
 20 (11.58 am)
 21 (A short break)
 22 (12.10 pm)
 23 SIR MARTIN MOORE-BICK: Right, Mr Martin, we will see if
 24 there are more questions for you.
 25 Ms Grange.

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1 MS GRANGE: Yes, just a few.
 2 Just on the numbers that we were just discussing,
 3 the numbering of the floors .
 4 A. Yes.
 5 Q. Can we just be clear, when you talked about painting in
 6 the numbers with stencils, are you talking about
 7 painting them in on the lobbies or in the stairwell?
 8 A. No, the lobbies, which I refer to as the communal
 9 areas --
 10 Q. Yes.
 11 A. -- had machine-made signs. The stairwell, each floor
 12 had a stencilled number, and all we did was paint over
 13 the stencilled number and re-stencil the new numbers to
 14 that.
 15 Q. So you painted over the old number --
 16 A. Yeah, obliterated it.
 17 Q. -- and re-stencilled on the stairs?
 18 A. Yeah.
 19 Q. Yes.
 20 A. So we just left it like-for-like with the new numbering
 21 system, because the stairwells, or the stairwell, wasn't
 22 down to be refurbished in any way.
 23 Q. You can't help us as to how big that stencilling was?
 24 A. Just that we had a lot of communication with the
 25 sign-makers and it fitted specifications .

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1 Q. Do you know, were any numbers in the stairwell obscured
 2 when you left site by the lighting or the temporary
 3 lighting in the stairs?
 4 A. No, no, they were on the stair head, on the half
 5 landings.
 6 Q. Yes.
 7 A. And the lighting was on the stairwell itself, on the
 8 stairs .
 9 Q. Earlier, when I was asking you about materials, you said
 10 that you might have asked Zak Maynard for help about
 11 what materials were supposed to be used. He was the
 12 commercial manager on the project.
 13 A. Yes, he would have priced individual materials.
 14 Q. I see, so that's why you would have asked him?
 15 A. Yeah, he was the first go-to person because he was
 16 a very helpful sort of chap.
 17 Q. Yes.
 18 I just want to clarify that no one ever told you on
 19 the project to read the NBS specification?
 20 A. I don't recall that.
 21 Q. No.
 22 Were you aware during your time on the project that
 23 some complaints had been raised by residents about the
 24 windows in general?
 25 A. There were complaints about the windows, but that was

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1 mainly operating errors, and obviously when the windows
 2 were first put in, because they were -- sorry, I'll slow
 3 down -- because they were tilt and open, there were
 4 problems with adjustments which you will get with new
 5 windows. So, yes, there were complaints, but they were
 6 dealt with, and I have to say very well, by Taff. If it
 7 was down to new handles or new hinges or adjustment of
 8 hinges, he would pretty much be there straightaway, if
 9 he wasn't on the mast climbers somewhere.
 10 Q. Did any of those complaints ever cause you to have
 11 concerns about the general quality of the work by SDP?
 12 A. No, none. The only issues with their work were there
 13 were four or five flats that complained about draughts
 14 coming out from underneath the PVC panels, the cill
 15 itself, and that was because the show flat also echoed
 16 the flat that there was no silicone bead put along
 17 there, and that was rectified by going back and putting
 18 a silicone bead alone, and that solved the issue.
 19 MS GRANGE: That's helpful, thank you.
 20 Mr Chairman, those are all of the questions.
 21 SIR MARTIN MOORE-BICK: Right, thank you very much.
 22 Well, Mr Martin, those are all the questions we have
 23 for you. Thank you very much indeed for coming here
 24 today to give us your evidence. It has been really
 25 useful to hear from you, and we are very grateful. Now

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1 you are free to go.
 2 THE WITNESS: Thank you very much.
 3 SIR MARTIN MOORE-BICK: Thank you very much. If you would
 4 like to go with the usher, she will look after you.
 5 (The witness withdrew)
 6 SIR MARTIN MOORE-BICK: Thank you, Ms Grange. Now, at this
 7 stage we need to have a short break so that --
 8 MS GRANGE: We need to do a bit of cleaning.
 9 SIR MARTIN MOORE-BICK: -- the witness box can be cleaned up
 10 properly, ready for the next witness.
 11 MS GRANGE: Yes, I think that's going to take between five
 12 and ten minutes.
 13 SIR MARTIN MOORE-BICK: Well, if I say 12.25, will that be
 14 safe?
 15 MS GRANGE: That's fine, apparently. Yes, thanks.
 16 SIR MARTIN MOORE-BICK: 12.25, then, thank you.
 17 (12.15 pm)
 18 (A short break)
 19 (12.25 pm)
 20 SIR MARTIN MOORE-BICK: Yes, Ms Grange. Now, we have
 21 another witness.
 22 MS GRANGE: Yes, now we have Mr Daniel Osgood, please.
 23 SIR MARTIN MOORE-BICK: Right, thank you.
 24 MR DANIEL OSGOOD (affirmed)
 25 SIR MARTIN MOORE-BICK: Thank you very much, Mr Osgood. Do

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1 sit down, make yourself comfortable.
 2 THE WITNESS: Thank you.
 3 SIR MARTIN MOORE-BICK: Yes, Ms Grange.
 4 Questions from COUNSEL TO THE INQUIRY
 5 MS GRANGE: Yes, thank you, Mr Osgood. Thank you very much
 6 for coming to give evidence to us today. It is really
 7 appreciated.
 8 If you have any difficulty understanding anything
 9 I say during my questions, please ask me either to
 10 repeat the question or put it in a different way.
 11 If you feel you need a break at any point, please
 12 just let us know.
 13 If you can also try and keep your voice up, because
 14 the lady to your right is transcribing, so that she can
 15 hear clearly what you're saying, and also try not to
 16 speak too fast, which is something I have difficulty
 17 with most of the time.
 18 A. Okay.
 19 Q. You have made one statement to the Inquiry. It's dated
 20 28 September 2018. If we can go to that. It's
 21 {RYD00094212}, and there is a copy in a folder on your
 22 desk, and it's also now on the screen.
 23 If we can look at -- I think at the bottom of both
 24 pages, but at the bottom of page 2 {RYD00094212/2}, the
 25 second page, is that your signature?

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1 A. It is, yes.
 2 Q. Have you read the statement recently?
 3 A. I have.
 4 Q. Are the contents true?
 5 A. They are.
 6 Q. Thank you.
 7 Now, I want to start with some questions about your
 8 background and experience, so if we can go back and look
 9 at paragraph 2 of your statement {RYD00094212/1}, you
 10 tell us there that you have over 30 years' experience in
 11 the construction trade. You were initially a labourer
 12 and then you became an industrial glazing installer.
 13 A. That's correct.
 14 Q. You have also worked in site management for just over
 15 ten years. We see that there.
 16 A. Yes, that's correct.
 17 Q. Then at paragraph 3 you tell us you joined Rydon on
 18 3 March 2014 and you left on 14 April 2017. We see that
 19 there.
 20 A. Yes, yeah.
 21 Q. In paragraph 4 -- I just want to ask you about that,
 22 before asking about Grenfell -- you say in the third
 23 line:
 24 "I had previously worked for a company that fitted
 25 cladding and glazing between 2001 and 2005 ..."

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1 A. That's correct.
 2 Q. You talk about using that experience on the Grenfell
 3 project.
 4 Can I just ask you about that previous experience:
 5 what was the name of that company that you worked for
 6 previously?
 7 A. It was Hull Clad was the name of the company.
 8 Q. What type of cladding systems did you install or
 9 oversee?
 10 A. We did a lot of work all over the country, in Scotland,
 11 Wales, Ireland. I've done the Limerick Hotel in
 12 Ireland, which was clad with a 5-metre panel, aluminium,
 13 and we used Rockwool as insulation.
 14 Q. Right.
 15 Had you included cladding made of, for example,
 16 aluminium composite material before?
 17 A. No.
 18 Q. No.
 19 A. Not from memory, no.
 20 Q. Had you ever had experience of cladding systems using
 21 PIR insulation, polyisocyanurate insulation?
 22 A. No. But I had seen it being used on other sites.
 23 Q. Yes.
 24 A. Not my site.
 25 Q. What about experience of fitting cavity barriers to

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1 cladding systems. Had you had any experience of that?
 2 A. Yes, yeah. I've fitted it myself, I'm an ex-fixer, and
 3 I've fitted it in the past.
 4 Q. Had you ever worked on high-rise buildings above
 5 18 metres?
 6 A. I worked on the Ibis Hotel in Wembley. That was
 7 22 floors.
 8 Q. Yes, and was that an overcladding project?
 9 A. It was, yes.
 10 Q. Yes, and were cavity barriers fitted there?
 11 A. Yes, there were.
 12 Q. Were they fitted around the windows in that project?
 13 A. No. In that project the original -- the windows went
 14 back in the original opening, so the cladding would have
 15 married into the frame.
 16 Q. Yes. Yes.
 17 A. Yes.
 18 Q. Thank you.
 19 Before leaving that company in 2005 and starting
 20 work on the Grenfell project, did you carry out any
 21 cladding work during that period, so between 2005 and
 22 2015?
 23 A. I'm just trying to think now. I did -- yeah, no, not
 24 particularly, no, not that I can recall.
 25 Q. Yes.

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1 Now, in your statement at paragraph 3 you explain
2 that after joining Rydon -- you say you initially joined
3 as holiday cover and you were a temporary site manager
4 for the first year, and you say you were involved in
5 a project which included demolition of an entire
6 estate in Brixton and the development of derelict
7 properties for temporarily housing residents.

8 A. That's correct.

9 Q. We see that there.

10 Did that project involve any installation of any
11 overcladding?

12 A. No. They were street properties, so it was mainly
13 internal works.

14 Q. During your time at Rydon, and prior to starting on the
15 Grenfell project, had you ever had any training in the
16 inspection of cladding works?

17 A. No.

18 Q. Had you had any other training which might have been
19 relevant to carrying out inspections of cladding work?

20 A. I believe that the experience of fitting it helped.

21 Q. Yes.

22 A. Where I learnt to read drawings, check certain things on
23 my checks.

24 Q. Yes.

25 Had you ever had any training in the requirements of

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1 the Building Regulations?

2 A. No.

3 Q. Did you consider yourself competent to be inspecting
4 cladding works at Grenfell Tower?

5 A. I did. Having fitted it for quite a number of years,
6 I knew what to look for.

7 Q. Yes.

8 A. I knew faults that could come up.

9 Q. Yes.

10 Now, we know that Rydon entered into, in the end,
11 a JCT design and build contract. Were you ever made
12 aware of any key obligations that Rydon had in that
13 contract?

14 A. No.

15 Q. So were you aware that Rydon had a duty to complete the
16 works in a proper and workmanlike manner and in
17 accordance with good building practice?

18 A. Oh, absolutely. I have been on SMSTS training, so I was
19 aware that there was the client, there was the designer,
20 and then there was Rydon, so ...

21 Q. The SMSTS training you refer to, what kind of training
22 was that?

23 A. It's a site management training scheme, and that takes
24 you through the different responsibilities of each
25 party.

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1 Q. Yes.

2 A. But it's not thorough. It's only a five-day course, so
3 it's not in-depth.

4 Q. When did you undertake that training course?

5 A. I've actually been on it twice, I believe.

6 Q. Yes. Can you remember when? Was it before the Grenfell
7 project?

8 A. I've got it in my CV. It was, yes.

9 Q. So both times you had been on it before the Grenfell
10 project?

11 A. Yes.

12 Q. Did any part of that training look at the requirements
13 of the Building Regulations?

14 A. It wasn't in-depth, so it was -- it brushed over it. It
15 didn't go into detail.

16 Q. Right.

17 Were you aware on the Grenfell project that Rydon
18 had to complete the works in accordance with relevant
19 statutory requirements, including the
20 Building Regulations?

21 A. Broadly, yes.

22 Q. When you say broadly, what do you mean?

23 A. Again, I don't know the exact details. I was aware that
24 they were there, but I didn't -- I don't have knowledge
25 of exactly what they are.

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1 Q. Yes.

2 Now, in terms of your role on the Grenfell project,
3 is it right that you were a site manager from
4 27 April 2015 to 24 July 2015?

5 A. That's correct.

6 Q. Who did you report to on the project during that time?

7 A. Grenfell? Sorry, the Grenfell?

8 Q. On the Grenfell project, who did you report to?

9 A. Simon Lawrence and Simon O'Connor.

10 Q. Who was in fact your line manager? Did you know who
11 your line manager was?

12 A. It was Simon O'Connor, he would have been the first
13 person to go to.

14 Q. Can you just describe for us in general terms what your
15 role as site manager involved?

16 A. Okay, so from arriving on site, it was already up and
17 running, obviously, so the first thing you do is you
18 look at the safety of the site, the surrounding areas,
19 for not only the workforce but the public.

20 Q. Yes.

21 A. And in particular the tenants, because they're going in
22 and out of the building.

23 Q. Yes.

24 A. So it's an extremely delicate situation. So the first
25 thing you want to do is make sure it's safe.

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1 Q. Yes.

2 A. The second thing you're going to look at is how we're
3 getting access to the works, you know, mast climbers,
4 scaffold. I'm trained in scaffold inspection.

5 And then it's getting the drawings and it's sitting
6 down with the contractor. We had a full set of
7 drawings, obviously, both on the M drive and also we had
8 hard copies in site. Also, Harley had a complete set of
9 drawings as well.

10 Q. Right.

11 A. So we basically sat down, went through it, looked at
12 what we were doing and how we were going to do it.

13 Q. Great, okay.

14 We'll come in due course to a little bit more about
15 what documents you saw during this process.

16 A. Of course.

17 Q. Did you have a written job description as site manager?

18 A. No, but I was -- I have been in the industry a while, so
19 I do have an understanding of the responsibilities.

20 Q. Were you taking over from a particular person within
21 Rydon when you came in, and if so, who was that?

22 A. I don't think I was particularly taking over.
23 Jason North was the other site manager there.

24 Q. Yes.

25 A. It's a very busy site, lots of work going on, and

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1 I think Rydon, rightly so, realised that, you know, it
2 needed more supervision. So that was my role,
3 basically.

4 Q. So was it expressly said to you, "We need some more
5 supervision on this site, that's why we're bringing you
6 in"?

7 A. I got a phone call from Simon Lawrence and he said,
8 you know, "Can you get over to Grenfell, it's under way,
9 they're starting the cladding, and can you oversee it".

10 Q. Yes.

11 Do you think you were assigned to the project
12 because of your knowledge and previous experience of
13 cladding?

14 A. I believe so.

15 Q. Yes.

16 A. I believe so.

17 Q. That was something that Simon Lawrence was aware, was
18 he?

19 A. I don't know that, but they do have a copy of my CV and
20 everything is in there, so --

21 Q. Yes, yes.

22 A. -- I would assume so.

23 Q. Is it right that your role was to oversee the
24 installation of the cladding to the exterior of the
25 building?

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1 A. That's correct, yes.

2 Q. Is it right that you were also involved with overseeing
3 the installation of the window trims to the show flat?

4 A. That's correct.

5 Q. Now, you state at paragraph 8 of your witness statement
6 {RYD00094212/2}, in the very final line, if we can just
7 look at that:

8 "I was not involved with any sign offs on any
9 internal works."

10 I just want to check what that means.

11 Does that mean that you were not involved with any
12 of the internal works at all or just you weren't
13 involved in the sign-off of those?

14 A. I wasn't really involved in any of the internal works.
15 So I -- we got down to a point on the building with the
16 cladding, and it then had to stop because they were
17 still working on the structure of the gym and the
18 nursery. So as we'd sort of stopped works on those,
19 I was asked to have a look at the trims, which was the
20 finishing around the windows.

21 Q. I see. So we will come back to this, but I just wanted
22 to be absolutely clear which bits you were involved in.

23 A. Sure.

24 Q. Because I think we might see that you had a little bit
25 of involvement in relation to some of the internal

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1 window trims. Is that right?

2 A. Yes, that's correct.

3 Q. Yes.

4 Now, you say at paragraph 9, in the third line:

5 "My role was to ensure the work was completed."

6 That's what you have said there.

7 A. Mm-hm.

8 Q. Now, I just want to look at something Simon Lawrence has
9 said in his statement, {RYD00094220/8}, and we look at
10 paragraph 44. So he says there:

11 "My role included regular visits to site [this is
12 him describing his role] to guide and support the Site
13 delivery team (Project Manager, Site Managers, etc.).
14 The Site Delivery Team is based on site and ensures the
15 day-to-day works are managed safely and correctly to the
16 design."

17 Do you see that there?

18 A. I do.

19 Q. I think you have just described a little bit about
20 managing the work safely when you gave a description of
21 your role.

22 I wanted to ask you about the "correctly to the
23 design". Can you explain, was that your understanding,
24 that you had to ensure that the works were managed
25 correctly to the design?

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1 A. Yes. I mean, like I mentioned, we would sit down with
 2 the drawings. We had a specification, set of drawings,
 3 and basically from that you could check everything that
 4 was going on. Yeah.
 5 Q. Was that specification the NBS specification that had
 6 formed part of the employer's requirements?
 7 A. No, I don't recall.
 8 Q. Can you remember what kind of specification it was that
 9 you looked at?
 10 A. Yeah, it was the -- on the M drive, there was a spec and
 11 a full set of drawings. So I would run through it with
 12 Harley, but the works were under way, so I didn't go
 13 into depth.
 14 Q. Was it a Harley spec that was perhaps one sheet, or was
 15 it much, much --
 16 A. No, it was multiple page, yeah.
 17 Q. -- more detailed spec?
 18 Sorry, I missed that.
 19 A. Sorry, it was multiple page, there was a lot to it.
 20 Q. Yes. Hundreds of pages?
 21 A. Yes.
 22 Q. I see.
 23 Was your understanding that you were managing the
 24 work correctly in accordance with the
 25 Building Regulations? Was that part of your role?

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1 A. Yes, I mean, as -- what we did was after a section of
 2 works, for example, we worked down the building, and
 3 from memory we did two floors at a time, and before we
 4 hung the panels, we would get Building Control out, and
 5 we literally would walk each elevation and inspect it,
 6 inch by inch.
 7 Q. When you say Building Control, are you meaning the
 8 Building Control officers from RBKC, from Kensington and
 9 Chelsea, or are you meaning the clerk of works on the
 10 project?
 11 (Pause)
 12 A. Sorry, from memory, I believe it was the clerk of works.
 13 Q. Right.
 14 A. But I'm 99% certain that we got Building Control up,
 15 because without Building Control sign-off, we can't do
 16 anything.
 17 Q. We're going to come back to this later, but you saying
 18 that you did two floors and then you would get
 19 Building Control out.
 20 A. Yes.
 21 Q. I wanted to pick you up on whether you meant
 22 Building Control there or whether you mean the clerk of
 23 works for each two-floor segment.
 24 A. That's a very good question. From memory, I believe it
 25 was the clerk of works.

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1 Q. Okay.
 2 A. Sorry, it's six years ago.
 3 Q. No, that's helpful, thank you.
 4 Would you accept that your role was not merely to
 5 assume that everything was compliant with the
 6 Building Regulations, and that you did have a role
 7 yourself in making sure the Building Regulations were
 8 complied with?
 9 A. I have no training in, you know, checking anything to
 10 see if it complies. So, no.
 11 Q. Okay.
 12 Just picking up in your witness statement on this
 13 point, in paragraph 9 of your statement, at page 2
 14 {RYD00094212/2}. I asked you about the third line where
 15 you say "My role was to ensure the work was completed",
 16 and then you go on and say:
 17 "I was not involved in any testing requirements,
 18 I assume that everything was compliant with the
 19 standards otherwise it would not have been signed off by
 20 the Clerk of Works or Building Control; I have no direct
 21 knowledge of this however."
 22 Do you see that there?
 23 A. I do, yes.
 24 Q. Just to be clear, you didn't think it was part of your
 25 role to be ensuring that the works were compliant with

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1 relevant standards, including the Building Regulations?
 2 A. As I say, I don't have the relevant training to do so.
 3 Q. Did you assume that the design you were being presented
 4 with in the drawings and the specification was compliant
 5 already?
 6 A. Absolutely, 100%. I had no -- I wouldn't even have
 7 dreamt that, you know, anything was going on the
 8 building that wasn't 100% safe.
 9 Q. Yes.
 10 Now, we touched on your knowledge of the
 11 Building Regulations. I just want to ask you a little
 12 bit more about that.
 13 Did you have a kind of working understanding of the
 14 basic requirements of the Building Regulations at the
 15 time of the project?
 16 A. Vaguely. Again, not in depth.
 17 Q. Did you know that the Building Regulations set out
 18 functional requirements that have to be achieved, kind
 19 of, you know -- I can give you an example: for example,
 20 that the external walls shall adequately resist the
 21 spread of fire over the walls; were you aware of that at
 22 the time?
 23 A. I was vaguely aware of it. I -- you know, again
 24 I hadn't done any sort of in-depth training on it.
 25 Q. Yes.

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1 What about unseen fire spread? Were you aware that
 2 the Building Regulations might require that the building
 3 should be designed so that the unseen spread of fire and
 4 smoke in concealed spaces is inhibited?
 5 A. No.
 6 Q. Had you heard of the approved documents, which are
 7 practical guidance which are issued to help with
 8 understanding the requirements of the
 9 Building Regulations?
 10 A. I've heard of them, but I couldn't tell you what's in
 11 it.
 12 Q. So if I asked you: had you looked at Approved Document B
 13 on fire safety prior to the Grenfell project, what would
 14 your answer be?
 15 A. I would say that I hadn't seen it.
 16 Q. Yes.
 17 Were you aware in general terms that buildings above
 18 18 metres required special consideration in terms of the
 19 external materials which could safely be used on
 20 a building?
 21 A. No, but in my mind, anything going on any building of
 22 any height should be 100% safe, and I'm quite,
 23 you know -- I don't understand what that is.
 24 Q. Had you ever heard of the phrase "limited
 25 combustibility"?

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1 A. Not with regards insulation. To my knowledge, all
 2 insulation was 100% fireproof.
 3 Q. Right.
 4 A. Fire retardant. You know, having seen it being used on
 5 buildings, I just assumed that everything was 100%
 6 fireproof.
 7 Q. Yes.
 8 What about the phrase class 0, had you ever heard
 9 that before?
 10 A. I had heard of the phrase when it came to paint, but not
 11 when it came to any other material.
 12 Q. No.
 13 A. You know ...
 14 Q. Did you have any understanding in general terms about
 15 where cavity barriers needed to be placed in an external
 16 wall in order to comply with --
 17 A. Absolutely.
 18 Q. -- the Building Regulations?
 19 Can you just describe in general terms what you
 20 understood about the locations in which cavity barriers
 21 were required?
 22 A. So cavity barriers would be used at every floor.
 23 Q. Yes.
 24 A. And then between the walls of each flat. So basically
 25 you're compartmentalising each property.

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1 Q. Yes.
 2 Did you understand that cavity barriers are required
 3 to limit fire spread within the cavity and also to limit
 4 fire spread from a compartment into the cavity wall?
 5 A. No.
 6 Q. Were you aware that there was guidance suggesting that
 7 cavity barriers ought to be installed around openings,
 8 including windows?
 9 A. No.
 10 Q. In your time doing cladding projects previously, had you
 11 ever encountered cavity barriers around windows before?
 12 A. No, I hadn't, no. As I say, any building that I've
 13 done, the new window would always go back into the
 14 concrete opening.
 15 Q. Were you aware that close attention had to be paid to
 16 the installation of cavity barriers to inhibit the
 17 spread of flame in the event of a fire involving the
 18 external cladding system?
 19 A. Absolutely, yes.
 20 Q. What would you have thought that meant? So you say you
 21 were aware that close attention needs to be paid; what
 22 kind of things would you think you needed to be looking
 23 out for in a cavity barrier system to ensure that it's
 24 going to prevent the spread of flame?
 25 A. So the first thing you would look at are the fixings

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1 that are holding it in place, ie an angle, and also you
 2 would be looking at how it's jointed between each length
 3 of firebreak. And -- yeah.
 4 Q. Yes.
 5 Were you aware that the rainscreen cladding façade
 6 was required to be installed in accordance with a CWCT
 7 standard, a Centre for Windows and Cladding Technology
 8 standard?
 9 A. No.
 10 Q. So when you read the specification on Grenfell, that
 11 multiple-page document you talked about, you didn't
 12 notice at any point in that that there was a requirement
 13 for a CWCT standard to be complied with?
 14 A. I don't recall, no, no.
 15 Q. Were you ever provided with a CWCT guidance on the
 16 Grenfell project?
 17 A. Not from memory, no.
 18 Q. Let me just have a look at something with you.
 19 If we can go to {CWCT0000046}, I just want to see if
 20 this triggers any recollection. This is something
 21 called the standard for systemised building envelopes,
 22 and part 6 deals with fire performance. Is that
 23 document in any way familiar to you?
 24 A. I recognise the document, but I can't tell you exactly
 25 what's in it.

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1 Q. And you can't tell us whether you were familiar with it
 2 at the time of the Grenfell project?
 3 A. No. No, I believe -- I mean, I think I've seen this on
 4 Rydon's M drive --
 5 Q. Right.
 6 A. -- electronic system. But, you know, I wouldn't have
 7 gone into it in detail.
 8 Q. So you weren't familiar with it at the time of the
 9 project?
 10 A. No.
 11 Q. And you wouldn't have been familiar with the fire
 12 performance requirements dealt with in it?
 13 A. No.
 14 Q. Were you aware of any other industry guidance that
 15 provided commentary on external wall construction and
 16 fire at this time?
 17 A. Sorry, can you repeat the question?
 18 Q. Yes.
 19 Were you aware of any other industry guidance that
 20 provided commentary on external wall construction and
 21 fire at this time?
 22 A. No.
 23 Q. So, for example, the Building Control Alliance, BCA, and
 24 their technical guidance notes, had you ever looked at
 25 those?

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1 A. No.
 2 Q. And you were never provided with any other industry
 3 guidance by Rydon?
 4 A. I wouldn't say -- I mean, all the information, you know,
 5 is on their M drive, so, you know, site managers can
 6 easily access that at any time.
 7 Q. I see. But nobody actually said to you, "In your role
 8 on this project, it would be very useful if you read
 9 this piece of guidance or that piece of guidance", you
 10 don't recall that?
 11 A. I don't recall that, no.
 12 Q. In terms of your understanding of different types of
 13 cladding products that were on the market at this time,
 14 at the time of the Grenfell project, were you aware that
 15 there were different kinds of cladding panels available,
 16 including metal panels consisting just of metal, but
 17 then metal composite materials, which had a mixture of
 18 metal and, say, a plastic core?
 19 A. I was aware that there were metal panels, and I was
 20 aware that, yes, there was ones that were enclosed, that
 21 had a sort of infill on the panel, and it was my
 22 understanding that the reasons for that was to prevent
 23 noise and things like that.
 24 Q. Yes.
 25 A. That was my only understanding of that.

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1 Q. Were you aware at the time that panels, these aluminium
 2 composite material panels, frequently contained a PE
 3 core that was highly combustible?
 4 A. Absolutely not, no, no, and I think if I had known that,
 5 I would have, you know, stopped everything and,
 6 you know, looked into it, but I didn't have a clue.
 7 Q. Thinking back to the ACM panel that was used on the
 8 Grenfell project, what did you think the core was?
 9 First of all, did you notice there was a core in that
 10 panel?
 11 A. I knew there was a core in there.
 12 Q. Yes.
 13 A. But, like I said before, it was my understanding that
 14 anything going on any building is fireproof, fire
 15 retardant.
 16 Q. Did you ever think about what that core was made of, and
 17 did you ever ask anybody what the core was made of?
 18 A. No, to be honest. You know --
 19 Q. If someone had asked you at the time, "What's in the
 20 middle of these panels?", what would you have said?
 21 A. I probably wouldn't have been able to answer. I knew
 22 that there was an infill, but -- you know, because as
 23 a site manager, you've got a set of drawings.
 24 Q. Yes.
 25 A. And basically, that's what you do.

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1 Q. You build to those drawings.
 2 A. Absolutely.
 3 Q. Yes.
 4 Were you aware at the time that panels were
 5 available with fire retardant or fire resistant cores
 6 which were less combustible?
 7 A. No.
 8 Q. Did you ever have any discussions with anybody within
 9 Rydon about these kind of topics, about the cores of
 10 panels or the fire retardance of panels?
 11 A. No, no, I saw no cause to.
 12 Q. Were you aware that there had been other major fires in
 13 high-rise buildings, both in the UK and internationally,
 14 when you worked on the Grenfell project?
 15 A. Not particularly, no.
 16 Q. Had you heard of a fire at Lakanal House in 2009 in
 17 Southwark?
 18 A. I had heard of that one, but that is the only one. And
 19 again, I just heard it in the industry. I didn't know
 20 specific details of that.
 21 Q. So you didn't know it had anything to do with the
 22 external cladding at all?
 23 A. No.
 24 Q. Had you heard of any fires internationally, for example
 25 in Dubai? Had you heard about tower fires in Dubai?

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1 A. No, no, I didn't.
 2 Q. Were you aware that in January 2012 a fire had occurred
 3 at Taplow House in the Chalcots Estate involving
 4 aluminium cladding installed by Rydon?
 5 A. I didn't, no.
 6 Q. No one told you that when you were working on the
 7 Grenfell project?
 8 A. No.
 9 Q. So you weren't aware of the incident report that had
 10 been prepared following that fire?
 11 A. No, not aware at all.
 12 Q. Did you know what the ACM product was that was to be
 13 used in the cladding at Grenfell Tower? Did you know
 14 what the make of the product was, the manufacturer?
 15 A. No.
 16 Q. So just looking at paragraph 5 of your witness
 17 statement, which is on page 1 {RYD00094212/1}, I want to
 18 ask you about what you say in the very last sentence.
 19 You're describing there the fitting of the installation
 20 on the exterior of the building and firebreaks being
 21 fitted. We will come back to that. Then you say in the
 22 last sentence:
 23 "The materials used appeared to be commonly used
 24 materials in the industry."
 25 Do you see that there?

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1 A. I do, yes.
 2 Q. Can you just explain to us precisely what you meant by
 3 that?
 4 A. Well, the panels didn't look unusual to me, they were
 5 ones I had seen before going on buildings, and the same
 6 stood for the firebreak and for the insulation. It
 7 looked the same.
 8 Q. When you say you had seen them before going on
 9 buildings, was that just as a bystander, an observer of
 10 other buildings, or was it based on your actual
 11 experience in constructing other buildings?
 12 A. It was buildings that I had seen in progress that
 13 I wasn't working on, and as I say, I come from a fitting
 14 background, and it was very similar to what they were
 15 fitting back in 2005.
 16 Q. Was your assumption that the materials were compliant
 17 based on the fact that these types of materials had been
 18 used on other projects?
 19 A. Yeah. Like I say, my understanding was that anything
 20 that goes on any building has to be 100% fireproof.
 21 Q. If we can look at an email that's sent to you when you
 22 start on the project, {RYD00040072}. If we look at the
 23 email at the top of that page, this is Simon Lawrence to
 24 you on 28 April 2015.
 25 A. Yeah.

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1 Q. He says:
 2 "Hi Danny
 3 "Another relevant email to the cladding package.
 4 "Regards.
 5 "Simon ..."
 6 Do you see that there?
 7 A. I do.
 8 Q. We can see that what he is forwarding is an external
 9 finishes schedule. Do you see that there?
 10 A. Yeah.
 11 Q. Now, if we can look at that external finishes schedule,
 12 this is at {SEA00000232}, if we could just blow up the
 13 top of that. This is an external finishes schedule, and
 14 what we see is, if we look six lines down in the main
 15 table, it says "Solid Spandrel Rainscreen Panels Walkway
 16 +2 and above", do you see that there?
 17 A. I do.
 18 Q. We can see the material is said to be aluminium
 19 composite panel, and then it says manufacturer:
 20 Reynobond. Do you see that there?
 21 A. I do.
 22 Q. And then to the right, "Smoke Silver metallic
 23 Duragloss 5000 Satin".
 24 Do you remember reviewing that information when you
 25 started work on the project?

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1 A. I do remember the email, I do remember opening it. Did
 2 I read it word for word and understand it fully? Then
 3 probably the answer's no.
 4 Q. I think you said earlier you didn't know exactly what
 5 product was being used; this would have told you,
 6 wouldn't it?
 7 A. It would appear so, yeah.
 8 MS GRANGE: Yes. Okay.
 9 Mr Chairman, I'm now about to move to a different
 10 topic about overseeing the installation of the cladding,
 11 so that would be a good moment.
 12 SIR MARTIN MOORE-BICK: Yes, very well, thank you very much.
 13 Well, Mr Osgood, we are going to have a break now so
 14 we can all get some lunch. We will come back at
 15 2 o'clock to resume your evidence.
 16 While you're out of the room, please don't discuss
 17 your evidence or anything to do with the refurbishment
 18 with anyone else.
 19 THE WITNESS: Thank you.
 20 SIR MARTIN MOORE-BICK: We will see you later.
 21 If you would like to go with the usher, she will
 22 look after you. Thank you very much.
 23 (Pause)
 24 Right, 2 o'clock, please.
 25 MS GRANGE: Thank you.

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1 SIR MARTIN MOORE-BICK: Thank you.
 2 (1.00 pm)
 3 (The short adjournment)
 4 (2.00 pm)
 5 SIR MARTIN MOORE-BICK: Right, ready to carry on, Mr Osgood?
 6 THE WITNESS: Absolutely, yes.
 7 SIR MARTIN MOORE-BICK: Thank you.
 8 Yes, Ms Grange.
 9 MS GRANGE: Yes, great, thank you.
 10 So I'm now going to ask you some questions about
 11 your work in overseeing the installation of the cladding
 12 to the exterior of the building.
 13 Were you given any particular instructions in
 14 relation to inspection of the works?
 15 A. Yeah, Rydon has a snagging procedure where it goes
 16 firstly to the contractor doing the works, then to the
 17 site manager, and then obviously clerk of works,
 18 Building Control.
 19 Q. Right. So that was your understanding of the procedure.
 20 Was that written down in a kind of written policy or
 21 procedure you were provided with, or was that just your
 22 knowledge of how they worked?
 23 A. I think it was just my knowledge, from fitting
 24 experience.
 25 Q. Yes.

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1 A. That was the way it was done.
 2 Q. Yes.
 3 Did you ever get the chance to discuss the façade
 4 package with Mr Lawrence when you started on the
 5 project?
 6 A. Not in great detail, but then I didn't see any reason to
 7 do that.
 8 Q. Yes.
 9 A. So -- I mean, I had all the drawings and the spec,
 10 so ...
 11 Q. Or Mr O'Connor, did you ever have a specific discussion
 12 with him when you started about the cladding package?
 13 A. Not that I remember, but I'm sure we would have had
 14 a conversation around the works, so --
 15 Q. What about representatives of Harley, did you speak to
 16 them when you arrived on site?
 17 A. Yeah, we -- you know, you've got to work very closely
 18 with the contractor so everyone understands what needs
 19 to be done.
 20 Q. Who would it have been at Harley that you were having
 21 day-to-day contact with?
 22 A. I believe it was Taff. He was the sort of lead fixer.
 23 Q. Yes.
 24 A. And then I think it was Ben, Ben Bailey, I think, he
 25 would come periodically as well.

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1 Q. Yes.
 2 You referred to Taff. Did you know at the time that
 3 they were subcontracted and that they worked for
 4 a company called Osborne Berry?
 5 A. No, I didn't know that.
 6 Q. Did you assume that they worked directly for Harley at
 7 the time?
 8 A. Yeah. That was my knowledge of them. I had not had any
 9 previous experience with them, so ...
 10 Q. Did you ever receive any briefing on fire safety when
 11 you arrived on the project?
 12 A. There was a fire risk assessment and method statement
 13 on site.
 14 Q. Yes.
 15 A. So, yeah.
 16 Q. What about fire safety in relation to the inspection
 17 works you were going to be overseeing: did you ever have
 18 any briefing about fire issues that might arise with the
 19 external cladding?
 20 A. No, no.
 21 Q. Let's look at an email from Mr Lawrence to you when you
 22 arrived. This is {RYD00039965}. If we could blow that
 23 up a little bit.
 24 So this is on 27 April 2015, when you first arrived
 25 on the project, and Mr Lawrence says:

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1 "Morning Danny
 2 "I understand you have landed at Grenfell ok this
 3 morning and are getting your head around Harley's façade
 4 package and the cladding. I have filed all of the
 5 information that we have (drawings & material info) in
 6 the following location ..."
 7 Then there is a link.
 8 "I'm sure it'll take a few days or so to get to
 9 grips with it so happy reading. Please pay particular
 10 attention to the Firebreak spec and insulation guide to
 11 ensure that they install correctly before any Building
 12 control inspection."
 13 Do you see that there?
 14 A. I do, yes.
 15 Q. Now, pausing there, can you recall what was in the
 16 location, in the link, that he provided you with there?
 17 A. There was a -- that basically is a folder on the
 18 M drive, and within that folder there's subfolders, and
 19 basically all the information regarding the project can
 20 be found in there.
 21 Q. Right. So were there drawings within that?
 22 A. There was drawings.
 23 Q. And did you read and scrutinise those drawings after
 24 receiving this email?
 25 A. Yeah, we also had a set -- a hard set on site as well.

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1 Q. Yes. Was that a shared set or a set that you had
2 yourself?
3 A. It was a shared set, so it was in the office, and it was
4 a complete set of drawings, so, you know, anything you
5 needed to know, you would be looking there.
6 Q. What about materials information and specifications?
7 Was that in the link as well?
8 A. It quite possibly was. I -- from memory, I don't
9 remember.
10 Q. Right. So you can't recall whether you had details of
11 the type of insulation and cladding panels to be
12 installed?
13 A. Not that I remember, no.
14 Q. We have already looked at a separate document you were
15 sent which told you about the Reynobond panels.
16 A. Yeah.
17 Q. But you can't remember anything else?
18 A. Anything other than that.
19 Q. He says in the last part of the email:
20 "Please pay particular attention to the Firebreak
21 spec and insulation guide ..."
22 First of all, what did you take him to mean by the
23 word "firebreak" when saying "firebreak spec"?
24 A. Firebreak -- again, fitted between floors and adjacent
25 walls. So, yeah, it's very important to get that right,

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1 because Building Control will see it, will look at it,
2 and he just -- he won't entertain it unless it's
3 properly done.
4 Q. Did you understand that to mean cavity barriers between
5 floors?
6 A. I think they're one and the same.
7 Q. That's what I'm asking you. He is using the word
8 "firebreak".
9 A. Yeah.
10 Q. Did you understand that to be a cavity barrier or
11 something else?
12 A. Yeah, from my experience they both mean the same thing.
13 Q. Okay.
14 Can we have a look at what that might have looked
15 like, the firebreak spec. If we turn to {SIL00000228},
16 this is the Siderise RH and RV cavity barriers for use
17 in the external envelope or fabric of buildings. So
18 this is what we think might have been the spec that
19 would be available at the time.
20 Do you recall seeing that?
21 A. I do remember seeing it, yes.
22 Q. Yes.
23 If we could just scan down a few pages just to see
24 the type of information we get. There they're dealing
25 with open state horizontal cavity barriers, and also

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1 Siderise RV vertical cavity barriers. Do you see that
2 there on the left?
3 A. Yes, I do.
4 Q. We have got a little diagram on the right.
5 If we look at page 2 {SIL00000228/2}, there I think
6 we see a little bit more about the open state horizontal
7 cavity barriers. Then if we can go to page 3
8 {SIL00000228/3}, there's some more information.
9 So do you recall seeing information like that at the
10 time?
11 A. Yeah. I do recall seeing it, but I didn't study it in
12 any depth.
13 Q. Did you pay particular attention to this guide when you
14 were looking at the cavity barriers and whether they
15 were installed correctly on site?
16 A. I don't remember doing that. I do remember the cavity
17 barriers, and I --
18 Q. Yes.
19 A. From my personal experience, it was, from what I could
20 see, very well done. I mean, you know --
21 Q. But you weren't checking -- sorry, you can finish.
22 A. Well, I was checking every detail of that cavity
23 barrier, so I found little to nothing. In my opinion,
24 it was a good install.
25 Q. When you say you were checking, were you using the

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1 Siderise literature to help you understand what you
2 needed to be checking for at the time?
3 A. No.
4 Q. We saw that Mr Lawrence said "Please pay particular
5 attention to the firebreak spec"; does that mean that
6 you didn't pay particular attention to it, or you did at
7 one point but not another?
8 A. I looked at it, but whether I fully digested it, I don't
9 think I did.
10 Q. Can we look at what we think might be the insulation
11 guide he's referring to. If we bring this up,
12 {CEL00000013}. Do you recall seeing this when you
13 started on the project?
14 A. I believe I did, yes.
15 Q. Yes. Again, did you pay particular attention to this
16 insulation guide when you were inspecting the work on
17 the exterior?
18 A. Not in depth, no.
19 Q. At page 14 {CEL00000013/14} of this, there are some
20 installation guidelines, if we can look at that. Do you
21 see there there's installation guidelines? Can you see
22 that?
23 A. I see that, yeah.
24 Q. Can you remember reading that at the time of the
25 project?

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1 A. No.
 2 Q. Do you see on the right-hand column, just before the
 3 heading "Selection of fasteners", there is a paragraph
 4 which says:
 5 "In all cases, the joints of the insulation boards
 6 should be taped with a self-adhesive aluminium
 7 rainscreen foil tape with a minimum width of 75mm."
 8 Do you remember reading that?
 9 A. I don't, no.
 10 Q. So you didn't check this guide to see what it told you
 11 about the installation of the insulation?
 12 A. No, I didn't.
 13 Q. Can you explain why not? Why wouldn't you have done
 14 that, given Mr Lawrence's email?
 15 A. I believe I looked at it, but again, I didn't digest the
 16 entire thing --
 17 Q. Yes.
 18 A. -- completely.
 19 Q. Now, you have described in your statement that your main
 20 role was to oversee the installation of the cladding on
 21 the exterior, and you describe the inspection process.
 22 If we can look at paragraph 4 of your witness statement
 23 {RYD00094212/1}, and just look at what you say there,
 24 and I just want to pick it up in the third line. You
 25 say there:

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1 "I had previously worked for a company that fitted
 2 cladding and glazing between 2001 and 2005 and so using
 3 that experience and considering the drawings and
 4 specification provided I would walk through each floor
 5 on every elevation and check that the insulation was
 6 secured with the correct amount of fixings to the main
 7 concrete structure and that it was a tight fit with no
 8 gaps. I would check that the rails had the correct
 9 amount of anchor bolts and they sat the correct distance
 10 from the face of the building. I would also check that
 11 the firebreak was fitted on secure hangers which were
 12 bolted to the main structure. Some of the work had
 13 already started, I believe to the top two floors were
 14 complete."
 15 Then I want to pick it up at what you say at
 16 paragraph 6 as well. You say:
 17 "I did not have any direct involvement with the
 18 installation, this was done by the sub-contractor
 19 Harley, I only checked it in the way described above.
 20 Working down the building, Harley would inform me once
 21 they had completed the installation and had carried-out
 22 their own snagging checks to one floor at a time;
 23 I would then go to the relevant floor and carry out my
 24 checks. I would check that the installation was
 25 consistent with the works above and to the standard

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1 ready to hand to the clerk of works. Once the clerk of
 2 works/building control had signed off the floor, the
 3 panels were fitted and we moved down to the next floor.
 4 Both the Clerk of Works and Building Control mentioned
 5 that it was a good install."
 6 So you have helpfully summarised for us what your
 7 work involved in terms of inspecting the installation.
 8 Just pausing there, on approximately how many floors
 9 had Harley completed the installation before you left
 10 the site on 24 July 2015?
 11 A. Oh, that's a good question. We worked down the block,
 12 down to the mezzanine area, which is the gym, I believe,
 13 and then we couldn't carry on any further. So, yeah, it
 14 was at that point I was asked to have a look inside.
 15 Q. So when you got there, the top two floors were complete,
 16 I think is what you say, and then by the time you left
 17 you were getting down to those lower floors; is that
 18 a fair summary?
 19 A. Yeah. The top two floors were complete to the point
 20 where they were ready for inspection.
 21 Q. Yes. So an awful lot of the cladding is installed while
 22 you're there on site; is that correct?
 23 A. Yes.
 24 Q. Yes.
 25 Day to day on site, was it the Osborne Berry

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1 installers that you were dealing with?
 2 A. On a daily basis, yes.
 3 Q. I think it's Bez and Taff; is that correct?
 4 A. Yes, that's correct.
 5 Q. I think you have said you met Ben Bailey; did you meet
 6 any other representatives of Harley on site?
 7 A. I don't recall.
 8 Q. Did you ever raise any concerns with Harley about
 9 compartmentation or cavity barriers, based on your
 10 inspections?
 11 A. No, no.
 12 Q. Was Harley inspecting the work as well? Were they
 13 checking their own work?
 14 A. Absolutely, yes. We wouldn't inspect until they had
 15 done that.
 16 Q. Who at Harley was doing that?
 17 A. Taff being the lead fixer, he would notify me. I mean,
 18 I would be watching closely, but once he had done and
 19 completed his snags, it then handed to me.
 20 Q. So it was Taff checking the work.
 21 Were you ever aware of anyone else -- I mean, Taff
 22 actually works for Osborne Berry, but I appreciate you
 23 didn't know that at the time. Were you aware of anyone
 24 within Harley itself checking the work before it got
 25 handed over to you?

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1 A. Not that I'm aware of, no.
 2 Q. Did you ever have any cause for concern about the
 3 thoroughness of the Harley inspections or the
 4 Osborne Berry inspections?
 5 A. No. As I said before, I found the installation to be
 6 a very good one. I remember going round the top two
 7 floors and thinking: I haven't got enough snags on this
 8 sheet, I'm going to do it again. I know that sounds
 9 terrible, but I'm just trying to emphasise that it was
 10 a very good install.
 11 Q. Yes.
 12 Did anyone within Rydon -- say Simon Lawrence or
 13 Simon O'Connor -- ever check your work of inspecting the
 14 works? Were you ever overseen in terms of that process?
 15 A. Absolutely. The process -- you know, you would have to
 16 document it, it would have to go in the file, you know,
 17 and then -- and like any other document, for example
 18 a sign-off by the clerk of works or Building Control, it
 19 would all be held on file on site.
 20 Q. Right, yes.
 21 Did they ever raise any concerns about the
 22 thoroughness of your inspections?
 23 A. No, no, not that I remember, no.
 24 Q. Now, we know you've told us in paragraph 4 that you
 25 would walk through every floor on every elevation and

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1 check that the insulation was secured with the correct
 2 amount of fixings to the structure, it was a tight fit
 3 with no gaps.
 4 Can we just turn to an email. This is
 5 {RYD00042091}. I'm looking for an email from
 6 Simon Lawrence to you and Simon O'Connor. Yes, it's
 7 that top email. This is 20 May 2015, and I want to look
 8 at the second paragraph of what Simon Lawrence says. He
 9 says:
 10 "As you can read I've told him about our Quality
 11 procedures which we should be carrying out."
 12 So maybe we should read the first paragraph first:
 13 "Please see my response below to the Client Energy
 14 funding Broker. Basically in order to receive funding
 15 for the External Wall Insulation which Harley's are
 16 installing I've had to provide some information to him.
 17 It is critical to the client that they achieve this
 18 funding as it could be over £100k.
 19 "As you can read I've told him about our Quality
 20 procedures which we should be carrying out. Whilst we
 21 always do this we aren't always the greatest on site at
 22 keeping all of the records. In this case we need to be
 23 spot on in case the funders require it at the end in
 24 order to release funds. Can you also ensure the
 25 attached External Works Inspection sheet is used?

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1 Obviously you'll need to add to the checklist comments.
 2 I've only filled in a couple as an example."
 3 Do you see that there?
 4 A. I do, yes.
 5 Q. So did you understand from this email that you needed to
 6 make sure these external works inspection sheets were
 7 being filled in?
 8 A. Yes.
 9 Q. Now, let's have a look at that. It is {RYD00042087}.
 10 Is that the checklist?
 11 A. From memory, yes.
 12 Q. Perhaps if we could blow up the top half of that, so we
 13 can see the questions.
 14 What it effectively seems to be -- would it be fair
 15 to say it's a tick-box exercise --
 16 A. Yes.
 17 Q. -- to check certain things?
 18 So:
 19 "Check setting out correct.
 20 "Check fixings are installed ...
 21 "Validation ...
 22 "Check correct product is installed."
 23 Do you see that there?
 24 A. I do, yes.
 25 Q. Did you fill in this checklist during your inspections?

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1 A. Yeah, I believe that, from memory, I believe that both
 2 Simon and myself -- that's Simon O'Connor --
 3 Q. Yes?
 4 A. -- did it immediately.
 5 Q. Right.
 6 A. We did a walk-round of the site and --
 7 Q. Did you ever add to this list? I mean, I think
 8 Simon Lawrence said to you in the covering email,
 9 you know, "I've filled in a couple of the lines but you
 10 might want to expand it".
 11 A. Yeah.
 12 Q. Did you ever expand the categories?
 13 A. Well, as I've said, with the cladding, from past
 14 experience, you would have maybe two or three of those
 15 pages, all with issues that had to be rectified, and
 16 then you would take it off one at a time when it was
 17 completed and done properly.
 18 In Harley's case, there was so little that I could
 19 pick up.
 20 Q. You say there was so little you could pick up. Just
 21 taking this in stages, does that mean that there was
 22 in fact a checklist produced with lots and lots of lines
 23 on it of things to check?
 24 A. Yeah. Well, you would fill it in by hand --
 25 Q. Yes?

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1 A. -- on various aspects of --
 2 Q. And did you fill in that checklist yourself during the
 3 inspections?
 4 A. Yes, I did, yeah.
 5 Q. Where did you store the completed checklists?
 6 A. It would be in the file on site.
 7 Q. Right.
 8 A. Along with, you know, Building Control's documentation,
 9 clerk of works and so on and so forth.
 10 Q. Yes.
 11 Now, I just want to ask you a little bit about
 12 inspection of the insulation.
 13 So when you were overseeing the installation of the
 14 insulation on to the concrete, is it right you walked
 15 through each floor on every elevation following
 16 completion of the work?
 17 A. Yes. As I said, we did two floors at a time. We
 18 wouldn't fit the panels until it was inspected by clerk
 19 of works and then, once he had okayed it, signed it, we
 20 would then close that off and then drop down to the next
 21 two floors.
 22 Q. I see. So, just to be clear, does that mean that clerk
 23 of works would see the insulation and the cavity
 24 barriers --
 25 A. Absolutely.

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1 Q. -- and then you wouldn't put the aluminium panels on
 2 until they had seen what was underneath?
 3 A. And signed --
 4 Q. And signed it off?
 5 A. Correct.
 6 Q. Yes, I see.
 7 At that first stage, when you have just got the
 8 insulation and the cavity barriers on, and focusing on
 9 the insulation, what were you actually checking for when
 10 you were doing your inspections?
 11 A. It was quite a lot of -- a lot of things that you would
 12 be looking for, you know, fixings being probably one of
 13 the more important, that they're in the right centres,
 14 the right distance. And also, you know, with the
 15 Rockwool -- or, sorry, the insulation, fixings to that
 16 and making sure that it was properly secured.
 17 Q. Right. So it's really predominantly about the fixings;
 18 is that right?
 19 A. Yeah, and it's the overall -- you know, there's so many
 20 things that could be wrong with the installation, and
 21 I'm just, off the top of my head, trying to think of
 22 exactly what they are. But there is a process, yeah.
 23 Q. Now, we just looked at it, and I think you confirmed
 24 that you weren't aware at this time of the requirement
 25 in the Celotex RS5000 specification guide that joints of

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1 the insulation boards should be taped with
 2 a self-adhesive aluminium rainscreen foil tape. That
 3 was what you just said a minute ago. Do you agree?
 4 A. Yes, yeah.
 5 Q. Can we have a look at a picture from Dr Lane's report at
 6 this point. If we go to {BLAS0000008/35}, and if we can
 7 blow that up a little bit.
 8 Now, there, we're seeing some insulation that's been
 9 installed on the columns, aren't we, there?
 10 A. Mm.
 11 Q. And we can see that someone has used foil tape across
 12 the joints of the insulation. Do you see that there?
 13 A. I do, yes.
 14 Q. Was that something that you were looking out for
 15 on site, were you checking that foil had been installed
 16 like that on this picture?
 17 A. Yeah, from memory -- sorry, it's a while ago, but yes,
 18 I believe so.
 19 Q. Yes.
 20 What about the edges there of the insulation? Did
 21 you ever think to question or query why no foil tape had
 22 ever been put down the edges?
 23 A. I don't remember, to be honest.
 24 Q. You don't remember?
 25 A. No.

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1 Q. So you don't recall ever having any conversations with
 2 anyone about that?
 3 A. I don't remember having any conversation, no.
 4 Q. No, okay.
 5 Now, did you yourself ever take any steps to examine
 6 the extent to which the insulation product complied with
 7 the requirements of the Building Regulations?
 8 A. No.
 9 Q. Now, we already saw that in your witness statement you
 10 said at paragraph 5 {RYD00094212/1} that the materials
 11 used appeared to be commonly used materials in the
 12 industry.
 13 With reference to that comment, we know that the
 14 insulation used was -- well, here the main insulation
 15 was Celotex RS5000. Were you aware that it was
 16 Celotex RS5000 at the time?
 17 A. Not specifically, no. I mean, as far as I was aware, it
 18 was insulation, it was going on a building, and that it
 19 should be the approved one or the one specified.
 20 Q. So would you have had an awareness that it was a Celotex
 21 product that was being installed?
 22 A. No.
 23 Q. Did you ever check the specification to see what
 24 insulation had been specified?
 25 A. Yeah, and as far as I'm aware that's what was in the

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1 spec.
2 Q. I see. But I think you said you didn't know it was
3 a Celotex product. If you had checked the
4 specification, wouldn't you have found that out?
5 A. I didn't know if there was a difference between Rockwool
6 or Celotex. I hadn't been trained in anything like
7 that.
8 Q. But just to be clear, did you ever check the
9 specification to see whether it was a Celotex insulation
10 that was specified or some other insulation?
11 A. I don't recall, no.
12 Q. Okay.
13 Was all of the insulation branded that was installed
14 on site? I mean, I think here, look, we're seeing
15 across the foil face there is no branding, although we
16 can see down the side there's some Celotex branding. Do
17 you have a recollection of whether the insulation that
18 was being installed was branded on the foil face?
19 A. I don't remember, to be honest.
20 Q. You don't remember?
21 A. I really don't.
22 Q. No.
23 Did you ever see any other insulation product being
24 installed on the façade, other than the Celotex product?
25 A. No, no, just that.

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1 Q. What about Kingspan Kooltherm K15? Were you ever aware
2 of a Kingspan product being installed?
3 A. No.
4 Q. So you can't help us as to where on the tower K15, the
5 Kingspan product, might have been installed?
6 A. I'm afraid not, no.
7 Q. So that was not something you were checking?
8 A. As I say, I didn't complete the entire block. It came
9 down a certain distance and then it was put on hold.
10 Q. Wouldn't part of your job have been to check that the
11 insulation that Harleys are installing is the same as
12 the insulation that's been specified for the project?
13 A. Absolutely, yeah. Yeah. As far as I was aware, that
14 was correct.
15 Q. But what checks did you actually carry out to satisfy
16 yourself that that was the case?
17 A. Again, we had a specification, and we went through that,
18 both myself, Taff, and we checked everything, as far as
19 I'm aware.
20 Q. But if you didn't know it was a Celotex product, then
21 how can you have been checking that the right product
22 was used?
23 A. I don't know.
24 Q. Were you aware that during your time on the project, on
25 26 May 2015, 96 sheets of K15 were ordered by Harley

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1 from a company called SIG for delivery on 4 June 2015?
2 A. No, I was not aware of that.
3 Q. Was it your job to know about what products and
4 materials were arriving on site?
5 A. Yes, I mean, any change in the material I would have
6 noticed straight away, I would have spotted that
7 straight away and then I would have asked questions.
8 But from memory, I don't -- I didn't see any change in
9 the materials.
10 Q. I see. Is that because it just all looked the same?
11 A. Yeah.
12 Q. Because it was an insulation board with a foil face?
13 A. Yeah.
14 Q. So you didn't think there was any change going on?
15 A. No.
16 Q. Were you aware that the Kingspan product had not been
17 specified in the main specification for the project?
18 A. As I say, I wasn't aware.
19 Q. Were you aware at the time, just in general, that K15
20 was a phenolic insulation product?
21 A. I don't know. I don't know, sorry.
22 Q. So you didn't ever have any discussions with anybody on
23 the project about the suitability of using the K15
24 product?
25 A. No, that I'm aware of, no.

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1 Q. Had you ever used that product on any other projects you
2 had been involved in?
3 A. What, Kingspan?
4 Q. The Kingspan insulation, in particular K15, had you ever
5 used it on any other projects you had been involved in?
6 A. From memory -- I know the name Kingspan, but whether
7 I had used it before or not, I'm not entirely sure.
8 Q. Do you know whether the clerk of works was ever made
9 aware that there was a Kingspan product being used?
10 A. Not that I know of, no.
11 Q. Or Building Control, would they have ever been aware
12 that there was a Kingspan product being used?
13 A. Not that I'm aware, no.
14 Q. Cavity barriers.
15 Now, you refer in a number of places in your witness
16 statement -- we looked at paragraph 4 {RYD00094212/1},
17 for example -- to firebreaks. When you talk about
18 firebreaks, are you meaning cavity barriers in that part
19 of your statement?
20 A. Yes.
21 Q. You told us at paragraph 5 that the firebreak was fitted
22 between each floor and each flat, and it was intended to
23 compartmentalise between each floor and each flat.
24 Did anyone ever tell you on the project that the
25 fire safety measures in Grenfell Tower depended on

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1 a high degree of compartmentation?
 2 A. No.
 3 Q. What steps did you take during your inspections to
 4 ensure that cavity barriers were correctly positioned
 5 and installed within the façade?
 6 A. There were obviously drawings, you know, and my role
 7 would be to go up, you know, measure the distance for --
 8 between the back and the front of it, and just
 9 generally, you know, check that it was in place, secure
 10 and it wasn't going to go anywhere. So ...
 11 Q. Can we look at some subcontractor progress meeting
 12 minutes. This is {HAR00000414}. So this is dated
 13 28 April 2015, subcontractor progress meeting minutes,
 14 and we can see that you're there and present from the
 15 list of people present. Do you see that there?
 16 A. I do, yeah, yeah.
 17 Q. So this is April 2015. If we go to item 6.03 at page 3
 18 {HAR00000414/3}, it says there, "B.B". Would that be
 19 Ben Bailey, do you think?
 20 A. I --
 21 Q. "B.B to issue elevations showing positions of fire break
 22 on all elevations to D.O."
 23 Would that be Ben Bailey?
 24 A. I believe so.
 25 Q. You believe so, yes. And DO, would that be you?

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1 A. Yes.
 2 Q. Did he ever issue elevations showing the position of
 3 firebreaks on all the elevations?
 4 A. I believe he must have done, because we had a full set
 5 of drawings, so I ... I don't actually specifically
 6 remember receiving it.
 7 Q. What we've never seen in the drawings is any full-scale
 8 elevations. Do you know what an elevation drawing is?
 9 A. Absolutely. It shows you the full --
 10 Q. Exactly. We haven't seen any elevations showing the
 11 position of the firebreaks on all the elevations.
 12 A. Sorry, it's quite a while ago, but --
 13 Q. Okay.
 14 A. -- I do believe there was.
 15 Q. Okay.
 16 Now, further down at page 3, at item 9.01, it says:
 17 "Windows and firebreaks being fitted to the North,
 18 East and West elevations."
 19 Do you see that there?
 20 A. I do, yeah, yeah.
 21 Q. So do we take it from that that firebreaks, ie cavity
 22 barriers, are at this point being fitted to the north,
 23 east and west elevations?
 24 A. Yes, yeah.
 25 Q. Can you help us understand why the cavity barriers were

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1 being fitted, but before Harley had sent elevation
 2 drawings indicating where to install the firebreaks?
 3 A. I can't, but I would assume that, from experience, the
 4 fitters knowingly would fit in the right areas.
 5 Q. Okay.
 6 Below that, under "Quality Control", item 10,
 7 item 10.01, it says this:
 8 "Agreed that joint inspections are to be carried out
 9 on elevations and signed off by C.O.W [clerk of works]
 10 and building control prior to covering areas with
 11 cladding. D.O-B.B-J.W and J.H to be present."
 12 Do you see that there?
 13 A. That's correct.
 14 Q. Would the DO be you to be present?
 15 A. It is, yeah.
 16 Q. Did the clerk of works approve the positioning of cavity
 17 barriers on site so far as you were aware?
 18 A. Yes, I mean, he gave us a certificate at the end of the
 19 visit, and that would be basically saying either he was
 20 happy with it or not.
 21 Q. Okay.
 22 You're clear, are you, that the clerk of works would
 23 have clearly seen where cavity barriers were being put
 24 and where cavity barriers weren't?
 25 A. Absolutely, it was all open.

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1 Q. Yes.
 2 What about Building Control? Did they approve the
 3 positioning of the cavity barriers?
 4 A. So this is where my memory is struggling a little bit.
 5 I know the importance of having Building Control up
 6 there.
 7 Q. Yes.
 8 A. And I would say 99.9% yes, but specifically I can't
 9 quite remember.
 10 Q. Okay. We're going to come back to some more detailed
 11 questions about Building Control in a moment.
 12 Can we turn to another document, {RYD00082733}.
 13 This is a site inspection report by John Rowan and
 14 Partners, the clerk of works; that's right, isn't it?
 15 A. That's correct, yes.
 16 Q. We can see the inspection date is 16 June 2015, so while
 17 you were there.
 18 If we can look at page 2 {RYD00082733/2} and look at
 19 the second-to-last box headed "Review site inspection
 20 log: Building Control", do you see that --
 21 A. I do.
 22 Q. -- one up from the top?
 23 A. Yeah.
 24 Q. We can see it says in the note section:
 25 "Last building control site visit was the same as

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1 before Friday 15th May 2015. The only observation was
2 that further details of the cladding fire breaks were
3 required. Rydon to confirm if they have done this."

4 Do you see that there?

5 A. I do, yes.

6 Q. Then it says:

7 "J. White will start inspecting the cladding
8 externally and Rydon to give one weeks notice."

9 So we are particularly interested in that first
10 comment there about the only observation from
11 Building Control was that further details of the
12 cladding firebreaks were required; okay?

13 A. Yes.

14 Q. Now, we can see that on 19 June, so three days after
15 this report, Mr O'Connor emails you. Let's just look at
16 that. This is {RYD00044168}.

17 You can see in the email below the top one that
18 Jon White has emailed his inspection report across, and
19 then what happens is Simon O'Connor sends that to you on
20 19 June, and he says:

21 "Morning Danny,

22 "Can you please respond to the comment about fire
23 breaks."

24 Do you see that there?

25 A. Yes.

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1 Q. He attaches the site inspection, and that's the
2 inspection report that we just looked at.

3 Now, did you read that attached site inspection
4 report, can you remember?

5 A. I can't remember, to be honest, but I would have done.

6 Q. Do you remember ever seeing some minutes that said
7 further details of the cladding firebreaks were
8 required?

9 A. I don't remember, no.

10 Q. Do you know what details Building Control had asked to
11 see in relation to the firebreaks?

12 A. I can't recall. I really can't.

13 Q. You have no recollection of that?

14 A. No.

15 Q. Now, you reply on the same day. Let's look at this.

16 This is {RYD00044204}, and I want to look in the middle
17 of page 1. So if we look, it's the second email down,
18 at 10.24, and you say:

19 "Hi Jon,

20 "All queries concerning firebreak were addressed and
21 closed out. Building control have stated they do not
22 need to return until we begin to hang panels."

23 Do you see that there?

24 A. That's correct, yes.

25 Q. Now, can you recall sending that email?

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1 A. That's just boosted my memory now, and I believe that
2 that was to do with some of the firebreak getting wet.
3 Because the panels weren't on, it had gotten wet.

4 Q. Yes.

5 A. So, you know, any firebreak, you know, it's the last
6 thing you want is for it to get wet, because it
7 deteriorates, and it wasn't a large section, it was just
8 a very, very, very small section, and we replaced it
9 immediately.

10 Q. The comment that's recorded in the clerk of works'
11 report is that further details of the cladding
12 firebreaks were required. That doesn't sound the same
13 as saying there's a concern about a patch being wet,
14 does it?

15 A. No, it doesn't.

16 Q. So can you ever recall whether any further information
17 was asked for by Building Control about the firebreaks
18 or the cavity barriers?

19 A. I don't remember them asking me. I know that they've
20 requested it in that email, but it's from Rydon, it's
21 not from -- you know, Rydon had to supply it, not me
22 specifically.

23 Q. Yes, although we can see that you're asked to address
24 that comment. You were specifically emailed the report
25 and asked if you could address it.

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1 A. I can't remember. I'm really struggling to remember
2 that.

3 Q. When you say here, "All queries concerning firebreak
4 were addressed and closed out", can you help us as to
5 what you were referring to, or what you think you were
6 referring to?

7 A. I believe it was that section that I told you about it
8 getting wet.

9 Q. Right. So what had happened in response to the
10 Building Control comments?

11 A. So if it was that section that had gotten wet, we
12 literally took it off and replaced it --

13 Q. Right.

14 A. -- from memory. Yeah.

15 Q. Then you say:

16 "Building control have stated they do not need to
17 return until we begin to hang panels."

18 Can you recall who you spoke to at Building Control?

19 A. Oh, I can't remember, no.

20 Q. Could it have been a man called Mr Hoban?

21 A. It could well have been.

22 Q. John Hoban?

23 A. Could have been John, yeah.

24 Q. Do you every recall having discussions with Mr Hoban?

25 A. Yeah, I mean, he was quite regular on site.

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1 Q. Can you ever recall any discussion at any time you might
 2 have had with him about the cavity barriers?
 3 A. The discussions I remember was one of how good
 4 an install it is. And again, his snag sheets were
 5 minor, and I think this was just one occasion that he
 6 had picked that up, and he was absolutely right, and we
 7 got it corrected immediately.
 8 Q. Do you ever recall providing any information to
 9 Building Control about the firebreaks?
 10 A. No. As site manager, you know, you point them in the
 11 right direction, but I wouldn't specifically give them
 12 information that, you know, he should have been supplied
 13 with anyway.
 14 Q. If he had asked you at the time, "What type of
 15 cavity barriers are these, which manufacturer?", would
 16 you have been able to tell him?
 17 A. No, but I could have easily found out. You know, I've
 18 got very supportive line managers, so ...
 19 Q. So you weren't aware at the time that these were
 20 Siderise cavity barriers that were being installed?
 21 A. No.
 22 Q. Now, is it right that Building Control didn't return
 23 then until August 2015, after the Reynobond ACM panels
 24 had begun being installed?
 25 A. I'm not too sure.

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1 Q. Let's just look at a document on that, if we go to
 2 {ART00004487/3}.
 3 This is a clerk of works report, if we go to the
 4 front page of this {ART00004487}. This is another clerk
 5 of works report and it's 7 August 2015.
 6 Then if we go back to page 3 {ART00004487/3} and we
 7 look at that top note, "Building Control", it says:
 8 "Last building control site visit was the same as
 9 before Friday 15th May 2015 ..."
 10 Do you see that there?
 11 A. I do, yeah.
 12 Q. So it would appear from these reports that
 13 Building Control hadn't visited since May and didn't
 14 return until August. You can't help us with that?
 15 A. No.
 16 Q. No.
 17 Now, in terms of the installation of the cavity
 18 barriers, were you aware at the time that the Harley
 19 specification had required two different products to be
 20 installed: a horizontal product and a vertical product?
 21 A. Firebreak, yes.
 22 Q. Yes. You were aware of that, were you?
 23 A. Absolutely, yeah.
 24 Q. Can we look at the Harley specification notes,
 25 {HAR00009735}. This is their specification notes dated

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1 3 March 2015. We can see, bottom of that page on the
 2 left-hand, one item up, Fire breaks", it says:
 3 "Horizontal - Siderise Lamatherm RH25G ...
 4 ventilated breaks ..."
 5 And then:
 6 "Vertical - Siderise Lamatherm RV ... full fill ..."
 7 Do you see that there?
 8 A. I do.
 9 Q. Do you recall seeing this page, this specification note,
 10 when you were on the project?
 11 A. Not specifically, no.
 12 Q. So how did you know that two different products were to
 13 be installed on the project, two different cavity
 14 barriers, the horizontal and the vertical? If you
 15 didn't see this, where did you get that from?
 16 A. From experience, always floor slab and adjoining wall
 17 would be --
 18 Q. Were you -- sorry, carry on.
 19 Were you aware that the horizontal Siderise product
 20 was different from the vertical Siderise product?
 21 A. No.
 22 Q. Were you aware that the horizontal has an expanding
 23 intumescent strip and so doesn't fully close the cavity,
 24 whereas the vertical is effectively a solid block, it
 25 doesn't intumesce?

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1 A. Sorry, as far as I was aware, they all had that
 2 expandable strip along the front, so that when a fire
 3 were to take place, that gap would close, which is
 4 a very small gap.
 5 Q. And that would suggest that you hadn't read the Siderise
 6 product information, wouldn't it, because if you had,
 7 you would have realised that the horizontal is different
 8 from the vertical product?
 9 A. I suppose so.
 10 Q. Can we look at a figure in Dr Lane's report again. So
 11 this is {BLAS0000008/48}, and I want to look at
 12 figure 8.52. If we could zoom in on that.
 13 This is looking at the installation of a cavity
 14 barrier on the column, so it's installed in the vertical
 15 installation; you agree?
 16 A. Yeah.
 17 Q. We can see from the blown out little picture on the
 18 right-hand side that it's a Siderise RH25 cavity
 19 barrier. Now, that's their horizontal product. Their
 20 vertical product is an RVG, and this is an RH25.
 21 Were you ever aware that horizontal cavity barriers
 22 were being installed in that way, in the vertical
 23 orientation?
 24 A. No, absolutely not, no.
 25 Q. If you had seen that on site, when you were doing your

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1 inspections, so this RH25 Siderise product with the
 2 green strip there being installed in that way, would you
 3 have had any reason to have queried that installation,
 4 looking at that photo now?
 5 A. No.
 6 Q. The other point to note about this photograph is the
 7 intumescent strip has been installed on the inside of
 8 the building where the green tape is.
 9 A. Yeah, I don't know what area of the building this is.
 10 Q. So this is a horizontal cavity barrier that's been
 11 installed vertically, but it's also been installed with
 12 the intumescent strip facing into the building instead
 13 of facing away from the building.
 14 A. That's not correct.
 15 Q. You agree that's not correct?
 16 A. Absolutely, yeah.
 17 Q. Did you know, thinking just about the horizontal cavity
 18 barriers, that they had to be installed with the
 19 intumescent strip facing outwards?
 20 A. Correct.
 21 Q. You knew that, did you?
 22 A. Yeah.
 23 Q. Did you know, then, that it was an intumescent strip
 24 that would expand?
 25 A. I did, yes.

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1 Q. I see.
 2 A. And I also knew that there was a certain distance from
 3 that intumescent strip to the back of the panel, which
 4 was a set distance, and so as soon as a fire starts, it
 5 closes the gap.
 6 Q. I see.
 7 Back to these vertical ones, you didn't appreciate
 8 that actually what had been specified was a solid block
 9 vertical product, and not these horizontal barriers in
 10 the vertical location?
 11 A. No.
 12 Q. Now, cavity barriers around the windows. Did you
 13 yourself ever think about whether cavity barriers were
 14 required around the windows at Grenfell Tower?
 15 A. No. As we -- as I put in my statement, we had
 16 a pre-start meeting, and sort of all parties that were
 17 involved in the works went through exactly what needed
 18 to be done in that area. So ...
 19 Q. Did you appreciate, when you were on site, that there
 20 were no cavity barriers closing the cavity around the
 21 window openings?
 22 A. From memory, it wasn't on any drawing that it needed to
 23 be there, so ...
 24 Q. So was that the reason why you never raised it, because
 25 it wasn't shown in the drawings?

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1 A. I didn't raise it because -- yeah, I mean, we're
 2 basically working to a set drawing, so that,
 3 you know ...
 4 Q. Had you ever been involved in any Rydon projects which
 5 had involved the installation of cavity barriers around
 6 windows?
 7 A. No. As I said, any project I would have been involved
 8 in, the windows always returned to the concrete
 9 structure and then it's sealed around that, so ...
 10 Q. But were you ever aware on another project that you were
 11 installing, whether or not they were flush with the
 12 windows or not, that you were installing something
 13 called a cavity barrier around a window?
 14 A. Yeah, I mean, it would be a foam or a -- you know, they
 15 would foam around the frame and then they trim it off.
 16 Q. Right.
 17 Can we just look at a figure in Dr Lane's report
 18 again, {BLAS0000008/40}, and I want to look at
 19 figure 8.42.
 20 Now, what she's helpfully done in that picture is in
 21 the blue rectangle she has indicated where the remains
 22 are of the horizontal cavity barrier. Do you see that
 23 there?
 24 A. I do, yeah.
 25 Q. We can see that that's some way above the finished floor

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1 line, isn't it?
 2 A. Yeah, it looks like.
 3 Q. Were you aware of that on site, that the cavity barriers
 4 were being installed some distance above the floor line?
 5 A. No. Absolutely not, no.
 6 Q. You weren't aware of that?
 7 A. In any that I inspected, it was in the right location.
 8 Q. What did you think the right location was?
 9 A. Right at floor slab.
 10 Q. I see. But you didn't see any cavity barriers near the
 11 windows or around the windows when you did your
 12 inspections?
 13 A. No.
 14 Q. Do you know whether anyone ever drew to the attention of
 15 Building Control that there were no cavity barriers
 16 around the windows?
 17 A. Not that -- not from memory, no.
 18 Q. Now, you have talked in your statement about inspections
 19 by both the clerk of works and Building Control. If we
 20 can just look at paragraph 6 of your statement again on
 21 page 1 {RYD00094212/1}, in that penultimate sentence at
 22 the bottom you say:
 23 "Once the clerk of works/building control had signed
 24 off the floor, the panels were fitted and we moved down
 25 to the next floor."

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1 Do you see that there?

2 A. I do, yeah.

3 Q. Focusing for a moment on the clerk of works, is it
4 correct that the clerk of works would inspect every
5 floor of the external façade works on every elevation?

6 A. Yes.

7 Q. Is it right that you wouldn't invite the clerk of works
8 to undertake that inspection until you were satisfied
9 that the works complied with the designs?

10 A. That's correct, yes.

11 Q. Now, in terms of Building Control inspections, as
12 distinct from clerk of works inspections, were you clear
13 in your mind who were the clerk of works and who was
14 Building Control?

15 A. Yes.

16 Q. Now, if we look at paragraph 11 of your statement on
17 Building Control over the page {RYD00094212/2}, you say
18 this:

19 "I was present during the majority of inspections of
20 the insulation and fire breaks by Building Control;
21 I would walk the inspector around the site once a floor
22 had been completed. When the inspector was happy with
23 the work he would sign a handover certificate and that
24 would be filed. There were no issues highlighted to me
25 during the inspections and the works were signed off,

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1 this meant that the aluminium panels could then be
2 fitted on top to form the external cladding. I would
3 expect that Rydon has copies of the inspection documents
4 issued by Building Control."

5 Do you see that there?

6 A. Yeah.

7 Q. Now, just to be clear, are you saying that
8 Building Control inspected every floor of the external
9 façade works on every elevation before the cladding
10 panels were installed?

11 A. As I say, my memory -- as I said earlier, it would be
12 something that, if you don't have a sign-off by
13 Building Control, you're not going anywhere. So, from
14 memory, I believe we did, but then I may be confusing
15 that with clerk of works.

16 Q. Wouldn't that have required Building Control to be
17 coming to site really rather often if they were doing it
18 that way?

19 A. Fortnightly.

20 Q. Is that your memory, that Building Control were coming
21 fortnightly?

22 A. As I say, I believe it may have been the clerk of works.

23 Q. Right. Yes.

24 A. Because from experience, the clerk of works -- obviously
25 you do your own snagging, the clerk of works would check

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1 it on behalf of the client, and then, once that area was
2 complete, at completion, Building Control would then
3 come in and check everything.

4 Q. Can you recall how many visits there were by
5 Building Control during your time on site, even just
6 approximately?

7 A. I can't remember, to be absolutely honest with you.

8 Q. Did you ever make any notes yourself of these visits, or
9 records?

10 A. Not specifically, no. It would have gone in my site
11 diary, but apart from that, no.

12 Q. Now, the documents we have suggest that there was
13 potentially two visits, certainly one on 15 May and
14 possibly another on 7 May, but no more than two visits
15 we can find in the documents. Does that strike you as
16 correct, or did you recall more visits?

17 A. I believe it was more.

18 Q. Can we just have a look at the site visit records. This
19 is Rydon's progress report number 11, {ART00004029}. So
20 this is the progress report number 11 -- we've looked at
21 a number of these today -- for progress 17 April 2015 to
22 15 May 2015. Do you see that there?

23 A. I do, yes.

24 Q. If we go within this to item 7 on page 12
25 {ART00004029/12}, we see there it says:

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1 "Building Control were on site on Friday 15th May to
2 inspect the top 3 floors for insulation, fire break and
3 window installation on three elevation and has no
4 adverse comments."

5 Do you see that?

6 A. Yes, I do.

7 Q. Then if we can then look at the progress reports that
8 follow, just briefly, so {TMO00836664}, this is the next
9 progress report for mid-May to mid-June 2015, and if we
10 can look at page 15 {TMO00836664/15}, item 8, we see no
11 visits in the period. Do you see that there?

12 A. I do, yes.

13 Q. Then if we look at the next one, this is {ART00004415},
14 so this is progress report number 13 which is from
15 mid-June to mid-July 2015, and if we go to page 16
16 {ART00004415/16}, item 8, it says Building Control, no
17 visits in Period. Do you see that there in the middle
18 of the page?

19 A. Yes, I do, yeah.

20 Q. You can take it from me -- I don't think we need to turn
21 it up -- the next one, 14 -- which, for the transcript
22 is at {ART00004512/11}, item 8 -- also says the same:
23 Building Control, no visits in the period. So that
24 takes us up to the end of your time on site.

25 So would you agree that, on the basis of Rydon's own

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1 site progress records, it would appear that the
 2 Building Control visits only occurred once between
 3 27 April and July 2015?
 4 A. That's certainly what that's suggesting, but to be
 5 honest, I can't fully remember.
 6 Q. Okay.
 7 Was there ever any discussions in the Rydon team
 8 about the lack of attendance by Building Control
 9 on site? Did anyone ever raise that as an issue?
 10 A. No, I never remember anything like that.
 11 Q. Now, we saw from paragraph 11 of your statement
 12 {RYD00094212/2} that you also said that Building Control
 13 inspectors signed and filed handover certificates. Do
 14 you remember that?
 15 A. Correct, yes.
 16 Q. Now, we're not entirely sure what that's referring to.
 17 In his witness statement, Mr Hoban does not mention
 18 that any certificates were generated or signed by him,
 19 or that he signed off on the cladding works.
 20 Can you help us as to what these certificates were,
 21 and are you clear that they were being signed by
 22 Building Control?
 23 A. Yeah, I mean, they have a standard handover procedure,
 24 as we do. If anything's brought up, it will be put in
 25 that report, and we would have to act on that. From

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1 memory, we had a trail of those.
 2 Q. Is it possible that you have become confused with
 3 certificates that were prepared or checklists that were
 4 prepared by the clerk of works rather than
 5 Building Control?
 6 A. Quite possibly. Quite possibly.
 7 Q. Yes, because no such handover certificates have been
 8 disclosed to the Inquiry. We can't find any
 9 Building Control handover certificates.
 10 A. Right. It's such a long time ago, you know, it's
 11 difficult to --
 12 Q. I understand, I understand. But you can't help us as to
 13 what kind of information those handover certificates
 14 contained?
 15 A. No.
 16 MS GRANGE: Now, just finishing off this topic --
 17 Mr Chairman, if I could just finish this topic and then
 18 that would be a good point for a break.
 19 SIR MARTIN MOORE-BICK: Very well.
 20 MS GRANGE: The inspection that Building Control did on
 21 15 May 2015 that we see clearly recorded here in Rydon's
 22 notes, John Hoban has made a note of this visit. Can we
 23 look at that, {RBK00003041/4}.
 24 So, do you see, it's at the bottom of that page,
 25 just one item up; can you see that?

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1 A. I can, yeah.
 2 Q. So it's 15 May 2015, and it's called an interim visit,
 3 and the notes just say this:
 4 "Inspection to check framework for cladding."
 5 Do you see that there?
 6 A. Yes.
 7 Q. Can you remember, did you accompany Mr Hoban on that
 8 site visit?
 9 A. I don't recall, to be honest.
 10 Q. So you don't have any independent recollection of it?
 11 A. No. No, I don't.
 12 Q. And you can't assist us with any further details of the
 13 site visit that Mr Hoban did at that time?
 14 A. I don't -- honestly, I can't remember.
 15 Q. Do you remember at any time while you were on site
 16 actually taking John Hoban up the mast climbers and
 17 showing him the work from the outside?
 18 A. Yes, I do, I do recall that. I do, I do recall,
 19 you know, checking everything. You know, and he would
 20 be checking as I was checking.
 21 Q. But do you have a memory of going with Mr Hoban up the
 22 outside of the building and actually looking at the
 23 insulation and the cavity barriers?
 24 A. I -- that's -- I can't remember. That's the honest
 25 truth.

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1 Q. Okay.
 2 Mr Hoban said a number of things about this visit,
 3 and I am going to put to you a number of things that he
 4 says were said to him --
 5 A. Okay.
 6 Q. -- because I want to ask you whether you might have said
 7 that to him --
 8 A. Okay.
 9 Q. -- at this or any time, really.
 10 Did you say to him that tests had been carried out
 11 to the metal framework supporting the cladding?
 12 A. No. No.
 13 Q. Did you say to him that this cladding system had been
 14 fitted to many buildings throughout England and Wales,
 15 to buildings of a similar height and construction?
 16 A. I've got no recollection of that either, no.
 17 Q. Does that sound like something you might have said to
 18 him?
 19 A. Definitely not, no. I mean, I'm not trained to,
 20 you know, say things like that. I -- you know, I just
 21 follow the drawing, I follow the spec.
 22 Q. Yes.
 23 A. I'm not in that position.
 24 Q. Could you have ever told him that the cladding would
 25 comply with the standards set out in Approved

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1 Document B?

2 A. Definitely not, no.

3 Q. What about whether you might have told him that the

4 cladding panels were class 0 or above.

5 A. No.

6 MS GRANGE: Mr Chairman, that would be a good point for

7 a break.

8 SIR MARTIN MOORE-BICK: Right.

9 We're going to stop now, then, for a bit of a break,

10 Mr Osgood.

11 Again, please don't talk to anyone about your

12 evidence or anything to do with the refurbishment while

13 you're out of the room.

14 THE WITNESS: Okay.

15 SIR MARTIN MOORE-BICK: We will come back at 3.20.

16 MS GRANGE: We're doing fine.

17 SIR MARTIN MOORE-BICK: 3.20, then, thank you very much,

18 would you like to go with the usher.

19 (Pause)

20 Thank you, 3.20, please.

21 (3.05 pm)

22 (A short break)

23 (3.20 pm)

24 SIR MARTIN MOORE-BICK: Right, Mr Osgood, ready to carry on?

25 THE WITNESS: Yes, thank you.

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

2 Yes, Ms Grange.

3 MS GRANGE: Yes, thank you.

4 Just a few follow-up questions on cladding and then

5 we're going to come on to the topic of windows after

6 that.

7 Back to thinking about the cladding and what you

8 were looking at with the cavity barriers before the

9 external panels went on, did you ever take any

10 measurements on site to check that the cavity barriers

11 were in the correct location according to the drawings?

12 A. Yeah, we did that with the barriers, with the rails, and

13 all the bracketry as well.

14 Q. Right. Yes.

15 What about photographs? Would you be taking

16 photographs as the cladding installation was going on

17 the building, as a record?

18 A. I don't recall, to be honest, I don't remember having

19 done. I did take some photos for my own personal

20 record.

21 Q. Just in terms of the panels on the outside of the

22 building, the ACM panels, approximately how much of that

23 had been installed when you left the site, can you

24 remember?

25 A. Not precisely but, as I mentioned before, we had to stop

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1 works at about the third floor, I believe it was.

2 Q. Yes.

3 A. Because there was still works ongoing there.

4 Q. Did you ever read the installation instructions for the

5 Reynobond panels, the panels on the exterior?

6 A. I don't remember, no.

7 Q. So you didn't ever take any steps to ensure that any

8 installers were suitably trained by the manufacturer, by

9 Arconic?

10 A. No.

11 Q. Okay, windows now.

12 You tell us in your witness statement that you were

13 involved in overseeing the installation of the interior

14 window reveals to the show flat at Grenfell Tower.

15 A. Yes, that's correct.

16 Q. You mentioned that at paragraph 8 of your statement

17 {RYD00094212/2}.

18 We can see from the documents that you also seemed

19 to be involved in overseeing the installation of the

20 interior window reveals to the windows more generally at

21 Grenfell Tower and not just the show flat. Is that

22 right?

23 A. No, I don't believe it's right.

24 Q. Okay.

25 Can we just look at a few documents and see if they

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1 help refresh any memory on this. Let's turn to

2 {RYD00043731}. So this is an email from Simon O'Connor

3 to you, Jason North and Jack Sullivan on 15 June 2015,

4 and he says:

5 "Afternoon All,

6 "For Clarity I thought it might be useful to

7 allocate some responsibilities, please see below."

8 Do you see that then we get a list, and under your

9 name, Danny, we've got:

10 "Subcontractors

11 "Mechanical & Electrical excluding first 4 floors."

12 Do you see that?

13 A. Yeah, I do.

14 Q. Then:

15 "Harleys Cladding and Internal glazing (Harleys).

16 "Internal window trimming and boxing (SDP)."

17 Do you see that there?

18 A. I do, yes.

19 Q. So did you understand at this point that you were

20 responsible for the internal window trimming and boxing

21 and supervising SDP's work in relation to that?

22 A. Yes.

23 Q. Then if we can also go to another document,

24 {HAR00017657}. If we start with the email at the bottom

25 of that page, on the same day, Simon Lawrence is

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1 emailing you, Jason North and Simon O'Connor on the
 2 subject of "Grenfell completion programme", and we can
 3 see he says:
 4 "Please find attached our new completion programme
 5 for Grenfell. You will need to share this with your
 6 sub- contractors and ensure that they are working in
 7 line with it."
 8 Do you see that there?
 9 A. I do, yes.
 10 Q. Then if we look at the email at the top of the page,
 11 this is from you to Mark Dixon of SD Plastering on
 12 16 June and you say:
 13 "Gents,
 14 "Please see attached revised completion
 15 program(sic)."
 16 Do you see that there?
 17 A. I do, yeah.
 18 Q. So would you accept that at least from this point
 19 onwards until you leave -- and I appreciate you leave
 20 the project in July -- you are responsible for the
 21 SD Plastering work on site?
 22 A. It was my job to oversee it, yes.
 23 Q. Yes.
 24 Now, in terms of the work you did overseeing the
 25 installation of the window reveals at the show flat, if

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1 we can look at a picture at this point in Dr Lane's
 2 report, {BLAS0000008/24}, and I want to look at
 3 figure 8.25, so that's the figure at the bottom of that
 4 page.
 5 So we can see here, can't we, that the new windows
 6 had been installed beyond the original building line so
 7 that they aligned with the external cladding; that's
 8 right, isn't it?
 9 A. That's correct, yes.
 10 Q. And the new windows lay outside and forward of the plane
 11 of the original masonry fabric and structure; that's
 12 right, isn't it?
 13 A. Yes, that's correct.
 14 Q. Given that the new windows were installed beyond the
 15 original building line, we can see that gaps were
 16 created between the newly installed windows and the old
 17 timber reveals, and also between the edge of the
 18 concrete window enclosure and the edge of the new window
 19 frames. Do you see that?
 20 A. I do.
 21 Q. So you have got gaps there at the bottom, with the old
 22 window frame, and then you have got gaps to the side
 23 with the column.
 24 Now, did you or, to the best of your knowledge,
 25 anyone else within Rydon ever give any consideration to

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1 the importance of ensuring that any of these gaps were
 2 closed in a way that maintained the compartmentation of
 3 the building?
 4 A. Sorry, can you repeat the question?
 5 Q. Yes. Did you or anyone else at Rydon ever give any
 6 consideration to whether these gaps should be closed in
 7 a way that maintained the compartmentation of the
 8 building?
 9 A. No, not from memory.
 10 Q. Did you think it was someone else's responsibility in
 11 Rydon to be thinking about that?
 12 A. According to the drawing, that was what was being asked.
 13 Q. I see. So, again, you just looked at the drawings and
 14 you understood you had to be fulfilling that, but you
 15 didn't ever question whether or not compartmentation
 16 would be maintained in terms of what was happening to
 17 these gaps?
 18 A. No.
 19 Q. Did you or anyone else to your knowledge when you were
 20 on the project ever discuss the risk of an internal fire
 21 migrating around the window edges and into a cavity
 22 lying in the external wall?
 23 A. No.
 24 Q. Now, we know that Rydon instructed SD Plastering, SDP,
 25 to carry out the installation of the window surrounds.

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1 If we could look at paragraph 8 of your statement on
 2 page 2 {RYD00094212/2}, if we pick it up four lines down
 3 on the right-hand side, you say:
 4 "There was a pre-start meeting with the director of
 5 SDP Solutions (Mark Dixon), Rydon project manager
 6 (Simon Conner(sic)), Rydon surveyor (James Clifton) and
 7 myself which set out what was to be done. The work
 8 involved was making good the gap between the new window
 9 and the window taken out."
 10 You see that there?
 11 A. Yes.
 12 Q. Was that Simon O'Connor that you're referring to there,
 13 the project manager?
 14 A. Yes.
 15 Q. Yes.
 16 Now, if we can go to Mr Dixon's witness statement at
 17 paragraph 17, this is at {SDP00000196/4}, if we could
 18 blow that up in the middle of the page. This is
 19 Mr Dixon and he says:
 20 "The example window surround consisted of a number
 21 of pieces of plastic soffit and fascia board that had
 22 been attached to the window reveals, cill and header.
 23 One of the Management Team explained that they were not
 24 happy with the standard of finish that had been achieved
 25 because, amongst other things, the plastic soffit and

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1 fascia boards were prone to 'bowing'."

2 Do you see that there?

3 A. Yeah, I do, yeah.

4 Q. Do you recall there being discussions about that with

5 SDP?

6 A. No, I don't, no.

7 Q. You can't recall discussions about bowing of the

8 internal window reveals?

9 A. I honestly don't, don't remember that.

10 Q. If you look at paragraph 19, Mr Dixon says:

11 "One of the Management Team instructed SDPL to

12 produce an alternative configuration for finishing off

13 the window surrounds that (i) was more aesthetically

14 pleasing than the example window surround; (ii) was

15 easier to install than the example window surround; and

16 (iii) would remedy the 'bowing' in the example window

17 surround ..."

18 Do you see that?

19 A. Mm.

20 Q. Again, does that trigger any recollection about

21 instructing SDP to produce an alternative configuration

22 for the finishings round the window?

23 A. Yeah, so the only thing I remember is that the old frame

24 of the window was to be left in place.

25 Q. Yes.

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1 A. And that we would trim up and over and around it, if you

2 know what I mean.

3 Q. Yes.

4 A. Which was very difficult to do, because you had to build

5 up, in, and then down again, and it just -- and instead,

6 the idea was to take the old frame out and just close in

7 after that, and it made a very much more solid, rigid

8 finish to the opening.

9 Q. When you say, "instead, the intention was to take the

10 old frame out", that isn't in fact what occurred,

11 though, is it? They didn't take the old frames out;

12 they left them in place, didn't they?

13 A. Yes, yeah.

14 Q. So when you say, "instead, the intention was to take the

15 old frames out", what do you mean?

16 A. That was one of the ideas, was to remove it completely.

17 Q. I see.

18 Now, moving on to paragraph 20, then, Mr Dixon says:

19 "SDPL did not receive any instructions from Rydon,

20 nor any other entity, concerning compartmentation and/or

21 fire resistance in respect of the Works."

22 Do you see that there?

23 A. Yes.

24 Q. Now, we know you were at that pre-start meeting. Can

25 you recall whether Rydon did in fact give SDP any

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1 instructions regarding compartmentation?

2 A. No. I'm not aware.

3 Q. So no, you can't recall, or no, those instructions

4 weren't given?

5 A. I can't recall, to be honest.

6 Q. What about fire safety more generally or

7 fire resistance; do you recall anybody at Rydon asking

8 SDP to ensure that what they were doing to the window

9 surrounds had the appropriate fire resistance?

10 A. No, not that I'm aware of.

11 Q. And you don't recall that being mentioned?

12 A. I do not recall, no.

13 Q. And that wasn't something you ever thought about when

14 you were involved in this work? You didn't ever think

15 to yourself: we do need to check whether these window

16 surrounds are of the appropriate fire rating?

17 A. It was put forward that it was compartmentalised and

18 that, you know, any fire spread would be stopped there.

19 Q. Who put that forward?

20 A. I don't remember, to be honest, I don't remember, but

21 I do remember an office conversation to that degree, but

22 I can't remember exactly who.

23 Q. Do you know whether, when instructing SDP to produce

24 this alternative configuration for the windows, anyone

25 at Rydon saw any advice from Exova or any other member

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1 of the design team about compartmentation or fire safety

2 more generally?

3 A. I don't remember, to be honest.

4 Q. Now, just going back to paragraph 10 of your statement

5 on page 2 {RYD00093212/2}, you say in the first line:

6 "I would say that consideration was given to

7 fire safety during the refurbishment."

8 Then if we go down to the third line, you say this:

9 "Fire retardant materials were also used for the

10 window trims and boxing in."

11 Do you see that there?

12 A. Yes, I do.

13 Q. Can you recall what materials were used for the window

14 trims and boxing in?

15 A. So from my memory, it was a fire retardant board that we

16 used. Again, from my memory.

17 Q. Are you talking about the board underneath the uPVC or

18 are you talking about the uPVC itself being a fire

19 retardant board?

20 A. Sorry, my memory's quite bad. To be honest with you,

21 I don't remember the specifics.

22 Q. But you have asserted here in your witness statement

23 that fire retardant materials were also used for the

24 window trims and boxing in.

25 A. Yes.

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1 Q. And what I'm asking is: on what basis are you asserting
2 there that the materials were fire retardant?
3 A. Because I had only done pretty much the pilot, my memory
4 of it is a bit vague. I'm not trying to dodge the
5 question or anything. But from my memory, it was a fire
6 retardant MDF board that was used. I could be very much
7 mistaken, but ...
8 Q. From memory it was a fire retardant MDF board?
9 A. Yeah, it was -- I -- you have to appreciate I only did
10 sort of the pilot and maybe a little bit more, so ...
11 yeah.
12 Q. I see.
13 You haven't said in this part of your statement,
14 "I'm sorry, but I can't remember whether the materials
15 were fire retardant or not"; you have positively said
16 that they were fire retardant materials, and I'm asking
17 you what you were basing that on when you said that in
18 your written witness statement?
19 A. I don't remember, I really don't, I mean ...
20 Q. Sitting here today now, is your evidence that you have
21 no recollection whether the material was fire retardant
22 or not?
23 A. No, no, I mean, I don't. It's very hard to remember.
24 I -- you know, it's six years ago.
25 Q. Do you have any recollection of ever inspecting any

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1 datasheets or certificates for the materials used around
2 the windows?
3 A. No.
4 Q. Do you have any recollection of you ever personally
5 checking that the materials were fire retardant?
6 A. No.
7 Q. Do you have any recollection of anyone else at Rydon
8 saying, "I've checked and the materials are fire
9 retardant"?
10 A. No, not that I'm aware of.
11 Q. What about Mr Dixon, do you remember SDP ever saying ...
12 A. No, I don't, no.
13 Q. Now, Mr Dixon has described the window surrounds in his
14 statement as "purely decorative". Was that how you
15 understood the surrounds to be, purely decorative?
16 A. Yeah, yeah.
17 Q. Now, at that pre-start meeting -- do you remember
18 attending the pre-start meeting with SDP?
19 A. I do, yes.
20 Q. Do you recall there being any discussions at that time
21 about the material that they were proposing to use to
22 make good the gaps?
23 A. Yeah, I mean, that was the whole point to the pre-start
24 meeting, was to establish what we were going to do, what
25 we were going to use, and how we were going to do the

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1 works.
2 Q. Was it discussed at that meeting that the gaps were to
3 be filled with insulation at the head, cill and jamb
4 positions, and then with uPVC put on top of that?
5 A. Quite possibly. I can't remember the specifics of the
6 meeting.
7 Q. Okay.
8 Would you agree that the Rydon briefing should have
9 ensured that materials were carefully selected to fill
10 any gaps in the window surrounds so as not to breach the
11 compartmentation of each flat in the building?
12 A. I would expect that to have been done, and, you know,
13 and that they were aware of what exactly had to go where
14 and what they were going to use.
15 Q. And, what, you just expected that of SDP or did you
16 expect that someone within Rydon would have had that
17 conversation with them?
18 A. I would have expected that someone within Rydon would
19 have had that conversation.
20 Q. But that wasn't you?
21 A. No.
22 Q. Did you ever refer back to the NBS specification, the
23 main specification that Rydon were provided on the
24 Grenfell project, to check what insulation should be
25 used to pack the window reveals?

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1 A. I didn't check it because, as I said, at the time,
2 I didn't see the need to. I was under the impression
3 that everything was 100% fireproof or it couldn't go on.
4 Q. I see. Can we have a look at the NBS specification,
5 {SEA00000169}.
6 This is dated 30 January 2014, and it's the last
7 version of the NBS specification, and it's a very, very
8 long document.
9 If I just give you an example of it, with reference
10 to these works around the window, if we look at page 243
11 {SEA00000169/243} within it, this is within item P10,
12 "Sundry insulation/proofing work", do you see at the top
13 left-hand side?
14 A. Yes.
15 Q. At the bottom of the page, item 235, there is reference
16 there to "Compressible insulation in gaps", do you see
17 that there?
18 A. I do, yes.
19 Q. Just in terms of the layout of this NBS spec and how it
20 looked, this is very typical of the pattern of the
21 document in terms of getting numbered items and then
22 little descriptions.
23 Does this prompt a recollection for you as to
24 whether you ever looked at this specification during the
25 Grenfell project?

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1 A. I can't remember, to be honest. I would have done, but
 2 remembering that, no.
 3 Q. You say you would have done. Here we've got
 4 "Compressible insulation in gaps", and the manufacturer
 5 there is Rockwool Limited. Do you see that?
 6 A. Yes.
 7 Q. The thickness is to suit the application, and I think
 8 the idea is it was going to be cut or packed tightly in
 9 the spaces that it needed to be.
 10 But did you ever check the NBS specification to see
 11 what it said about the materials around the window?
 12 A. Sorry, I don't remember, to be honest.
 13 Q. I think you said earlier today that you were aware of
 14 Rockwool as an insulation product at the time.
 15 A. Absolutely, yeah.
 16 Q. What did you know about it?
 17 A. That it was an insulation, that it was fireproof. I was
 18 under the impression that all insulation was fireproof,
 19 as a standard, as a, you know ...
 20 Q. So you didn't know that there might be a difference
 21 between a mineral wool insulation and, say, a phenolic
 22 insulation or a PIR insulation product in terms of its
 23 fire performance?
 24 A. No, no, absolutely not.
 25 Q. Did it ever occur to you, when you were helping instruct

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1 SDP at the beginning and when looking at the show flat,
 2 that compressible insulation might be easier, given the
 3 odd shape of the gaps that you had to fill? Did that
 4 ever occur to you?
 5 A. I don't recall.
 6 Q. If you didn't check the NBS specification to see what
 7 materials were selected around the windows, who would
 8 have been checking?
 9 A. My understanding was, you know, at design stage, at
 10 contract stage, when, you know, it's all been -- being
 11 put together, all that would be agreed and okayed.
 12 Q. Because what we know is that this product wasn't there
 13 on the Harley drawings, because this wasn't part of
 14 Harley's package, was it?
 15 A. No.
 16 Q. It said, "Insulation by others" on the Harley drawing,
 17 so this fell outside their work, and that's why SDP
 18 picked it up. That's right, isn't it?
 19 A. I believe so.
 20 Q. So in those circumstances, it wasn't for Harley, and it
 21 wasn't shown in Harley's drawings, wasn't it for someone
 22 within Rydon to be checking, when instructing SDP to do
 23 that work, what the NBS specification said about
 24 insulation in gaps?
 25 A. Yeah, I mean, I believe that, you know, SDP would have

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1 been approached and someone at Rydon would say, "Well,
 2 we need you to do this", basically giving them
 3 an instruction and showing them what exactly was wanted.
 4 Q. But you're there at that first meeting with SDP, and
 5 you're involved, aren't you, in helping with the show
 6 flat and getting the first configuration of this window
 7 right?
 8 A. Yeah.
 9 Q. So why didn't you go back to the specification, check
 10 it, and then say to SDP, "By the way, we need
 11 compressible Rockwool insulation in this area"?
 12 A. To be honest with you, at the time we had -- Rydon's
 13 surveyor was there, I believe, along with SDP, and they
 14 were primarily talking about what the process was and
 15 what was expected. And to be honest with you,
 16 I remember thinking at the time more of how we were
 17 going to do it, seeing as how we had, you know, tenants
 18 in situ, and we were doing potentially very disruptive
 19 works. So my mind was focused on how we were going to
 20 do it, how we were going to keep the people, the
 21 tenants, safe in their flats whilst we do the work.
 22 Q. Okay.
 23 Are you aware whether you or anyone else at Rydon
 24 gave a copy of that part of the specification to SDP to
 25 tell them what materials were supposed to be going round

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1 the windows?
 2 A. Again, as I say, I would expect, when the order goes to
 3 SDP, that everything would be in there for them and it
 4 would be explained exactly what's expected.
 5 Q. Would you agree that if the NBS specification had been
 6 referred to, then it would have been clear that the
 7 selection of Celotex in May 2015 by SD Plastering was at
 8 odds with the specification?
 9 A. Quite possibly. I mean, I -- as far as I was aware, it
 10 was fireproof. I honestly thought that all insulation
 11 on a building that size would be fireproof.
 12 Q. Did you know that the Celotex product used around the
 13 windows is a fire class F product? Would that have
 14 meant anything to you?
 15 A. No.
 16 Q. And not a material of limited combustibility?
 17 A. No.
 18 Q. And that the Kingspan Thermapitch TP10 was a class E
 19 product? Were you aware of the Kingspan Thermapitch
 20 TP10 product being used around the windows?
 21 A. No.
 22 Q. Now, after the meeting with SDP, that initial meeting,
 23 SDP send a quotation for completing the works, and that
 24 quotation was later updated at the end of May, on
 25 29 May 2015. If we can go to that quotation, it's at

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1 {SDP00000192}. If we can blow that up, this is the SDP
 2 revised quotation.
 3 Do you have any recollection of ever seeing that?
 4 A. I do remember it, but I don't know exactly what's in
 5 there.
 6 Q. So on the second line down, under "Description of item",
 7 it says:
 8 "Place Celotex insulation to reveals and base of
 9 window."
 10 Do you see that there?
 11 A. Yes.
 12 Q. Do you recall noticing that at the time?
 13 A. No.
 14 Q. So you didn't ever query why the Celotex insulation had
 15 been included in that quote?
 16 A. No.
 17 Q. Now, it was on 13 May 2015 that Rydon confirmed its
 18 instruction to SDP to proceed with the works.
 19 Now, looking at paragraph 9 of your statement, if we
 20 could look at that on page 2 {RYD00094212/2}, you say
 21 there:
 22 "The methodology of the installation and the
 23 specification of the materials used were agreed before
 24 my involvement in the project and would have involved
 25 the surveyors, sub-contractors, the client and Rydon.

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1 My role was to ensure the work was completed."
 2 Do you see that there?
 3 A. Yes.
 4 Q. Now, in fact, we know that the instruction to SDP to
 5 proceed with their quotation was on 13 May 2015, so that
 6 was after you started work on the project, wasn't it?
 7 A. Yes.
 8 Q. But is it right you didn't realise that when you wrote
 9 your statement?
 10 A. No.
 11 Q. Did you ever read SDP's risk assessment and method
 12 statement for the works?
 13 A. No.
 14 Q. Let's just look at that, {RYD00089065}. So we see there
 15 it's got the scope of works and it says:
 16 "Install and make good Flo Plast soffit and fascia
 17 board around window reveals. Board is to be cut and
 18 stuck using adhesive and all gaps made good with
 19 mastic."
 20 Then if we can look at page 3 {RYD00089065/3} we
 21 also get there "Substances and Materials", and it tells
 22 us what they're using.
 23 Do you recall seeing this method statement at the
 24 time?
 25 A. No. No, I don't.

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1 Q. Do you recall ever checking that what SDP were saying in
 2 a risk assessment or method statement was consistent
 3 with the materials that were supposed to be being used
 4 on this project?
 5 A. I don't remember this document at all.
 6 Q. Now, on 20 May you instructed SDP to complete the works
 7 in the show flat. If we go to {SDP00000190}, this is
 8 you to Mark Dixon, and it's "145 Grenfell Tower", and
 9 you say:
 10 "Here is the list works that need to be completed by
 11 end of play Wednesday 27/05/15."
 12 We can see a list of what needs to be done there.
 13 Now, that was the show flat, wasn't it, flat 145?
 14 A. That's correct, yes.
 15 Q. This list doesn't mention anything about ensuring
 16 compartmentation or anything to do with fire safety or
 17 fire resistance of the materials, does it?
 18 A. No.
 19 Q. Did you think that somebody else within Rydon was
 20 checking whether the materials that SDP were proposing
 21 to use around the windows was consistent with the
 22 requirements of the Building Regulations?
 23 A. Absolutely, yeah.
 24 Q. Who would that have been within Rydon, then, on your
 25 understanding?

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1 A. I would believe that, you know, when SDP are approached
 2 to do the works, a list of materials and anything going
 3 into that would be specified to them by Rydon,
 4 a surveyor or someone that's actually issuing the order.
 5 Q. Right.
 6 Now, you say at paragraph 15 of your statement
 7 {RYD00094212/2} that you did not have any concerns about
 8 the refurbishment project and didn't see anything
 9 unusual on the project.
 10 Do you remember concerns being raised about the work
 11 on the show flat?
 12 A. From memory, I believe that it was straightforward. We
 13 would do this, close it in, box it off, and that's
 14 basically what we did do. I didn't see any concern.
 15 Q. Would you agree that getting the show flat right was
 16 really important because everything was going to flow
 17 from that once you got the show flat determined?
 18 A. Absolutely.
 19 Q. That was supposed to then just be replicated across all
 20 of the other windows.
 21 A. And, you know, it wasn't just the windows on the inside,
 22 there was lots of other work. So I was acutely aware
 23 that, you know, once it was ready, it would then have to
 24 go to Building Control and they would say yes or no, and
 25 then we could roll it out on a much more permanent

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1 thing.

2 Q. Now, can we look at an email about the show flat,

3 {RYD00042487}.

4 So this is an email from Simon Lawrence to you and

5 Simon O'Connor.

6 A. Yes.

7 Q. It's about the show flat, and he says in the first

8 paragraph:

9 "I've sent an email tonight to Mark explaining my

10 thoughts and asking him to call me when he is on site

11 tomorrow."

12 We will see in a moment that there is a separate

13 email to Mark Dixon about this.

14 Then he goes on and says this:

15 "I've also made Steve Blake aware so he isn't

16 shocked when he visits tomorrow.

17 "Overall I am extremely upset that we have got to

18 today and in my opinion are nowhere near having the flat

19 in a show condition. It shouldn't take me to visit and

20 noticed the issues straight away. Apart from being

21 unfinished in areas the bouncy window board is a

22 disaster. I still can't understand how it hasn't been

23 noticed before.

24 "I'm expecting to be called to account from Steve

25 and quite frankly I haven't got any good excuses. The

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1 only saving grace is that the Client's Director isn't

2 planning on visiting tomorrow as first thought.

3 "Whatever happens that flat has got to be top notch

4 ready for inspection by the client next week. I expect

5 nothing short of a quality job."

6 So we can see that.

7 Now, do you recall receiving this email?

8 A. I do.

9 Q. Why was Mr Lawrence saying that Mr Blake would be

10 shocked when he saw what was in that show flat?

11 A. I think that's a little unfair, because the -- at that

12 point I remember going to the flat with, I believe,

13 Simon O'Connor, and we looked at it and there were so

14 few things to actually bring it up to handoverable

15 stage. I think that email was a little unfair.

16 Q. Are you saying it was an overreaction on Mr Lawrence's

17 part?

18 A. Yeah, I believe so.

19 Q. So you didn't accept that the issues with the show flat

20 were as serious as he was saying?

21 A. I don't believe that it was as serious as he was saying.

22 The flat had issues, as, you know, any handover that you

23 do is going to have a handful of issues that need to be

24 corrected, it was definitely true, but not to that

25 level, I don't believe.

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1 Q. What did he mean by "the bouncy window board is

2 a disaster"?

3 A. I believe there was some movement in one of the boards.

4 But, again, we had it corrected straight away, so ...

5 Q. So was that about bounciness in the uPVC because there

6 was insufficient packing underneath it?

7 A. I can't remember the specifics, but it could have had

8 something similar to do with that.

9 Q. Did that bouncy window put you on notice that there were

10 unacceptable cavities around the windows and that the

11 technique for compression had not been successful in

12 terms of packing that window out?

13 A. No.

14 Q. No?

15 A. No.

16 Q. Now, were you aware that Mr Lawrence had specifically

17 requested a plasterboard packer to support and fill the

18 voids?

19 A. From memory, I remember something, yes.

20 Q. Do you know why that plasterboard packer wasn't ever

21 included?

22 A. I don't, no.

23 Q. You can't help us on why there was no plasterboard there

24 and instead we got foam insulation?

25 A. I can't remember, to be honest with you.

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1 Q. Now, there's an email to Mr Dixon, as he prefaces there

2 in his first paragraph. Let's go to that:

3 {RYD00042486}. I want to go to the bottom email of the

4 chain on page 1. So this is Mr Lawrence to Mr Dixon.

5 Now, I appreciate you wouldn't have seen this at the

6 time, but he says -- and I would like to look at the

7 last paragraph:

8 "I then took a look at the window trimming which

9 unfortunately wasn't the finished item that I was

10 expecting. There are still some areas which need tidying

11 up i.e. joint strips need installing, a couple of side

12 trims outstanding and there is a large gap behind

13 several reveal returns which are too large to mastic.

14 Also Andy has used a different UPVC product than the

15 original. It had more of a bull nose."

16 Do you see that there?

17 A. I do, yeah.

18 Q. Then he says {RYD00042486/2}:

19 "My biggest concern is how they have fitted the

20 window boards compared to original attempt. It seems

21 that because they have used a thicker board they have

22 decided not to install a plasterboard packer below. In

23 my opinion that was a big mistake. This means that now

24 all of the windows have a void beneath them which is

25 only partly stuck with grip fill. As soon as you press

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1 them they noticeably deflect . Some really badly. In my
 2 opinion this isn't acceptable and they all need
 3 reinstalling . Have a look and see what you think."
 4 Do you see that there?
 5 A. I do.
 6 Q. So can you see Mr Lawrence is saying that he thinks not
 7 installing a plasterboard packer below was a big
 8 mistake?
 9 A. I see that. I don't remember this email.
 10 Q. Well, you didn't receive this email. What I want to ask
 11 you is whether you were aware that Mr Lawrence was
 12 concerned that no plasterboard packer had been installed
 13 below the uPVC.
 14 A. No.
 15 Q. You weren't aware at all?
 16 A. No.
 17 Q. Would you have been aware at the time that plasterboard
 18 might have provided some more fire resistance than the
 19 combustible insulation that in fact was used?
 20 A. I don't remember. I mean, I don't remember seeing
 21 plasterboard anywhere to be used, even as a packer.
 22 Q. I see.
 23 Now, in the same email chain at the top of page 1
 24 {RYD00042486/1}, Mr Lawrence also sends an email to
 25 Mr Blake. He says in the second paragraph:

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1 "I've been to site today and taken a look at the
 2 flat . To be fair I'm really disappointed and extremely
 3 unhappy with our progress and quality. Whilst Mark's
 4 lads haven't helped the matter, our management hasn't
 5 done anything about it . I don't understand why it takes
 6 me to notice these items. I can only assume that those
 7 responsible our end haven't visited the flat during the
 8 installation process."
 9 Do you see that there?
 10 A. Yes.
 11 Q. Now, you were the site manager overseeing this work,
 12 weren't you?
 13 A. Yes.
 14 Q. Would it have been you that he's referring to there,
 15 "our management hasn't done anything about it"?
 16 A. It could be, or it could be management in general,
 17 but ...
 18 Q. Did you fail to visit the flat during the installation
 19 process?
 20 A. Not at all, I was there all the time. Well, not all of
 21 the time, but I made sure I would be in and out, just to
 22 see how the progress was going.
 23 Q. At the time, who did you think should take
 24 responsibility for rectifying what Mr Lawrence had
 25 referred to as a "disaster"?

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1 A. Ultimately me, I would have thought. But we did, we did
 2 it immediately.
 3 Q. So what happened as a result of Mr Lawrence's
 4 complaints, can you recall?
 5 A. Yeah, I mean, we took another look at it. I can't
 6 remember the exact specifics, but I do remember it was
 7 dealt with quite rapidly, so ...
 8 Q. Do you know whether SDP were given better or different
 9 instructions following this?
 10 A. No, that I'm aware of.
 11 Q. No, they weren't given different instructions?
 12 A. No.
 13 Q. Can we look at a snag list that you sent to Mr Dixon
 14 shortly after this. This is {HAR00017649}. This is
 15 a snag list you sent on 28 May 2015. So this is
 16 flat 145, so that's the show flat; yes?
 17 A. Yes.
 18 Q. So is this the list you sent after Mr Lawrence's
 19 complaint?
 20 A. I don't recognise it, but ...
 21 Q. Can we look on within this at page 2 {HAR00017649/2}, at
 22 point 01, it says:
 23 "Lounge:
 24 "01. Flexing window board to be removed and
 25 replaced ..."

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1 Do you see that there?
 2 A. I do, yeah.
 3 Q. Can you explain why you haven't given Mr Dixon more
 4 direction on filling the void underneath the flexing
 5 window board?
 6 A. No, I can't, I mean ...
 7 Q. Was that because you thought no further direction was
 8 needed to remedy the problem?
 9 A. No, I didn't believe so.
 10 Q. Can you explain why you don't refer to this incident to
 11 do with the show flat in your witness statement?
 12 A. I didn't feel the need, and probably just didn't
 13 remember, to be honest.
 14 Q. Do you know what steps, if any, were taken to ensure
 15 that SDP's work was properly checked after this?
 16 A. I don't. I wasn't there at handover, so I would presume
 17 it would be the standard snagging procedure and handover
 18 to a clerk and Building Control, so ...
 19 Q. Were you aware that after this SDP had to regularly
 20 chase for sign-offs in relation to its work?
 21 A. No, I was not aware of that.
 22 Q. Let's just have a look at {RYD00044120}, and I want to
 23 look one email down on the first page. So this is
 24 Simon O'Connor to you, 18 June 2015:
 25 "Afternoon Danny

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1 "Following a conversation with Andy Cole SDP this
 2 afternoon he is concerned that we are ploughing ahead
 3 with internal window trimming and currently none have
 4 been signed off by COW.
 5 "Is this correct?
 6 "Please can you update me on this urgently ..."
 7 Do you see that?
 8 A. I do.
 9 Q. He notes in that last line :
 10 "Please can you update me ... as we should be
 11 getting these signed off on a weekly basis."
 12 Do you see that there?
 13 A. Yes.
 14 Q. Now, did you carry out inspections after this on the
 15 internal window surrounds?
 16 A. Not that I remember, no.
 17 MS GRANGE: Okay.
 18 So I now want to look at just some emails
 19 surrounding your departure from the project, when you
 20 left.
 21 Mr Chairman, I have four pages left of fairly short
 22 notes.
 23 SIR MARTIN MOORE-BICK: Right.
 24 MS GRANGE: So if I can just finish these questions and then
 25 we'll have to break for the CP questions.

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1 SIR MARTIN MOORE-BICK: Yes, very well.
 2 MS GRANGE: If we can go to {RYD00089265}, and then if we
 3 can look at an email you sent to Mr Lawrence, I think
 4 it's at the bottom of this page. Yes, so it's at 15.13,
 5 the bottom of that page, "Grenfell tower - window trim",
 6 do you see that you say "Simon", and then we go over the
 7 page {RYD00089265/2}:
 8 "Not entirely sure what you mean by get your hand
 9 dirty but if your implying I bring in some work clothes
 10 and tools to complete the job myself, you will need to
 11 think again ... You asked me if I would help on this
 12 project and I am all about helping out but not if it
 13 means being treated with this kind of disrespect.
 14 I have been in site management for over 10 years and
 15 have no intention of picking up tools again."
 16 Then you say something about the door not arriving.
 17 Now, we can see, looking at the email below, that
 18 this was related to a disagreement with Mr Lawrence
 19 about the painting of a cupboard in the show flat; is
 20 that right?
 21 A. That's correct, yes.
 22 Q. Now, I don't want to ask any more details about that
 23 specific incident, but I want to ask you about your
 24 relationship with Mr Lawrence and Mr O'Connor.
 25 How would you describe your relationship with them

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1 on the project?
 2 A. My relationship with Simon O'Connor was very good, very
 3 strong, very healthy. To be honest with you, I found
 4 the relationship between me and Simon Lawrence a little
 5 strained. You know, I'm the kind of person that does
 6 things in due course, whereas Mr Lawrence wants it done
 7 right now, "No ifs, buts or maybes, I want it done".
 8 And in reality, that's not always achievable.
 9 Q. Okay.
 10 Did you consider Mr Lawrence to be an effective
 11 manager on the project?
 12 A. Yes, I did. You know, the fact -- you know, a lot of
 13 contracts managers, they want it done now, so it wasn't
 14 unusual to be that way, but, you know, he had a bit of
 15 a temper, he, you know ...
 16 Q. What about Mr O'Connor, did you regard him as having
 17 been an effective manager on the project?
 18 A. Yeah, Simon O'Connor -- in fact, all the managers, they
 19 were very proactive. As I say, when I arrived on site,
 20 the place was perfectly run from what I could see. You
 21 can tell straight away when there's good management in
 22 place on a building site, and I could tell straight away
 23 that, you know, Simon O'Connor, Jason North, they were
 24 all out to do the best possible job.
 25 Q. Can we look at an email Mr Lawrence sent to Mr Blake in

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1 July 2015. This is {RYD00047116}. This is headed
 2 "Personal improvement plan".
 3 Can I ask you first, have you ever seen this email
 4 before?
 5 A. I don't believe so, no.
 6 Q. There is a section beginning at paragraph 2. It says
 7 this:
 8 "Danny - my concerns about him relate to his lack of
 9 commitment to be responsible for his works and manage a
 10 situation proactively and adequately. He seems not to
 11 be able to make a decision. I think he does this so he
 12 isn't responsible should anything be wrong.
 13 "He's also is (sic) out on site a majority of the
 14 time but doesn't seem to have an understanding about
 15 what his subcontractors are doing. For example,
 16 I walked the whole block yesterday and found areas that
 17 I wasn't happy about. All riser cupboard doors were
 18 unlocked even though we weren't working on a majority of
 19 floors. Tools and items in the cupboards which I don't
 20 think should have been there. The Clerk of Works has
 21 also sent an email today expressing his concerns about
 22 us working safely in occupied communal areas with
 23 materials and tools not behind barriers. I get the
 24 impression that Danny is willing to react but can't be
 25 bothered to check it is correct in the first place."

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1 Then in the next paragraph he says:
 2 "Another example of this is when he was responsible
 3 for getting the show flat ready for the last
 4 consultation session. I visited the flat with Zak in
 5 the afternoon as the work was being finished to find
 6 different pieces of trim being used on different
 7 adjacent windows (some bull nose some square edge).
 8 Also some had been packed correctly whilst others
 9 deflected because they hadn't be installed the same.
 10 Admittedly SDP should have picked this up also but it
 11 wasn't noticed until it was finished. Then it was me
 12 that picked it up. That says Danny wasn't controlling
 13 the works."
 14 Then he goes on, if we can scroll down, he talks
 15 about:
 16 "The last and best example is regarding the HIU
 17 cupboard install."
 18 Then he talks about that. I'm not going to read
 19 that bit out.
 20 At the bottom of that paragraph, it says, third line
 21 up:
 22 "When I talked to him about his performance he
 23 blamed lack of labour and said he would never commit
 24 100% to getting a job done to a deadline. He'd only try.
 25 That's sounds another excuse to me. Then he booked a

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1 weeks leave for the following week."
 2 Finally, he says this:
 3 "In my opinion he is just a chancer who wants to do
 4 as little as possible and not be responsible for
 5 anything. Currently he is demotivating the others on
 6 site and none of the Subbies want to deal with him. He
 7 needs to be moved asap."
 8 Do you see that?
 9 A. Yes, I do.
 10 Q. Is this the first time you have seen that email?
 11 A. Yes, it's the first time I've seen this.
 12 Q. Okay.
 13 Were you aware at the time that Mr Lawrence had
 14 these concerns about you?
 15 A. I was aware that we weren't getting on. I was aware
 16 that, you know, he ... he's a very vocal person, so if
 17 he's not happy about something, you're the first to know
 18 about it.
 19 Q. Yes.
 20 A. So I feel it's very unfair, because, you know, there's
 21 a lot going on at the time, and I was getting on fine
 22 with the contractors, with everybody, it was just, in my
 23 view, Simon Lawrence.
 24 Q. Yes. I mean, we wanted to give you the chance to
 25 comment on this and what he says about it.

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1 A. That's the first time I've seen that, so ...
 2 Q. How would you yourself describe the commitment that you
 3 showed to the works?
 4 A. The same commitment that I have throughout my working
 5 history, and that is to apply yourself 100%, you know,
 6 and ticking the boxes as you go to make sure that it's
 7 done in a timely manner and that it's done properly.
 8 Q. Yes.
 9 He says that you were reluctant to make decisions
 10 because you didn't want to be held responsible for them.
 11 Is that your criticism you would accept?
 12 A. To a point. I'm not going to make decisions over and
 13 above the decisions that I can make -- you know, that
 14 I'm trained to make. I'm trained as a site manager to
 15 manage subcontractors, and I believe I do it reasonably
 16 well; in fact, better than reasonably well. But then
 17 you'll have to ask the contractors.
 18 Q. He says in there that you didn't seem to have
 19 an understanding about what your subcontractors were
 20 doing. Again, would you say that was a fair criticism?
 21 A. No.
 22 Q. Did you know what your subcontractors were doing
 23 on site?
 24 A. Yes, I did, yes.
 25 Q. He talks about demotivation towards the end, "he is

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1 demotivating the others on site and none of the Subbies
 2 want to deal with him". Is that something that you
 3 would accept?
 4 A. No, not at all.
 5 Q. Now, this email was entitled "Personal improvement
 6 plan". Were any steps put in place during your time on
 7 the project to either monitor your work or improve your
 8 performance, so far as you were aware?
 9 A. Yes. Due to this, I believe that Rydon felt that they
 10 had to take steps to make sure I knew how to do my job,
 11 and I fully understand that, and they're very
 12 supportive, they put me on courses and they sort of --
 13 sort of watched me over the next six months to see how
 14 I was doing, what I was doing, and it was a process, it
 15 was a learning process.
 16 Q. Yes.
 17 A. It was a good process.
 18 Q. Yes. That wouldn't have been watching you on the
 19 Grenfell project, would it, because you had left in
 20 July 2015?
 21 A. No, that's correct, yes.
 22 Q. So was that in other Rydon projects?
 23 A. Yes, it was.
 24 Q. I understand.
 25 Why did you leave the project on 24 July 2015, the

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1 Grenfell project?
 2 A. There was another project come up, and I was asked to go
 3 and oversee that, so ...
 4 Q. Was it related to your relationship with Mr Lawrence
 5 that you left the project at that point?
 6 A. Could have partly, but I don't think entirely.
 7 Q. Did you brief anybody at Rydon as part of a handover of
 8 responsibilities when you left the project?
 9 A. No. There was ... there was, I believe, Simon O'Connor,
 10 so ... yeah, I mean ...
 11 Q. I see. So you didn't do any kind of formal handover to
 12 anybody coming in?
 13 A. Not a formal one, not that I can remember.
 14 Q. Did you have any concerns about the project that you
 15 didn't pass on at that time?
 16 A. No.
 17 Q. Just some very, very short questions now.
 18 Mr Stokes, Carl Stokes, do you remember ever seeing
 19 Mr Stokes on site, coming into contact with him?
 20 A. I don't recall, to be honest.
 21 Q. He was the fire risk assessor for the TMO. You can't
 22 recall ever speaking to him about the cladding?
 23 A. No, no.
 24 Q. Or about the fire retardancy, fire resistance of the
 25 cladding?

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1 A. No, I wouldn't do that.
 2 Q. Did you ever tell Mr Lawrence anything about the fire
 3 performance of the cladding, for example that it was
 4 inert and wouldn't burn?
 5 A. No, absolutely not.
 6 Q. Or the TMO, would you ever have said that to the TMO?
 7 A. No, definitely not.
 8 MS GRANGE: Mr Chairman, I have come to the end of my
 9 questions, I appreciate a little bit later than I said.
 10 SIR MARTIN MOORE-BICK: Well, there it is. Thank you very
 11 much.
 12 Mr Osgood, Ms Grange thinks she has reached the end
 13 of the questions, but we always have a little break at
 14 this point to take stock and make sure.
 15 THE WITNESS: Absolutely.
 16 SIR MARTIN MOORE-BICK: So ten minutes should be enough,
 17 shouldn't it?
 18 MS GRANGE: Yes.
 19 SIR MARTIN MOORE-BICK: We will break now and come back at
 20 4.25 and see if there are any more questions for you
 21 then. Is that all right?
 22 THE WITNESS: Thank you, yes.
 23 SIR MARTIN MOORE-BICK: Would you like to go with the usher,
 24 please.
 25 (Pause)

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1 Right, 4.25, please.
 2 MS GRANGE: Thank you.
 3 (4.15 pm)
 4 (A short break)
 5 (4.25 pm)
 6 SIR MARTIN MOORE-BICK: Right, we will see if there are more
 7 questions for you, Mr Osgood.
 8 Ms Grange, how do we stand?
 9 MS GRANGE: The bad news is there are, but the good news is
 10 there aren't very many, so we will be quick.
 11 SIR MARTIN MOORE-BICK: All right, thank you.
 12 MS GRANGE: Photographs, Mr Osgood. I asked you about
 13 photographs you took on site and you said you thought
 14 you did take some.
 15 A. Yeah, I do have a recollection of it, I can't
 16 remember --
 17 Q. Can you remember what became of those photographs?
 18 A. No.
 19 Q. No. What use did you put those to, when you were taking
 20 them, was that just for your own --
 21 A. I think it was for my own reference.
 22 Q. Yes.
 23 We just want to show you a picture of Mr White,
 24 Jon White, the clerk of works, to see if that helps,
 25 because you talked before about clerk of works

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1 inspections, Building Control inspections, and I think
 2 you admitted that you may have got a little bit confused
 3 about who was doing what.
 4 We just want to show you this picture,
 5 {TMO10005787/4}. We should find a picture there, if we
 6 could blow it up, of Mr White, the clerk of works.
 7 Does that help you at all as to who it was that was
 8 inspecting frequently and whether you're right that
 9 Building Control were inspecting more frequently than
 10 the Rydon records show us?
 11 A. It doesn't help, to be honest.
 12 Q. It doesn't help? Okay.
 13 A. I know it sounds ridiculous, but ...
 14 Q. Well, we thought we would try.
 15 A. Yeah, sorry.
 16 MS GRANGE: Mr Chairman, those are all my questions. Thank
 17 you very much.
 18 SIR MARTIN MOORE-BICK: Right. Well, they were few, weren't
 19 they?
 20 MS GRANGE: Yes.
 21 SIR MARTIN MOORE-BICK: Thank you very much.
 22 Well, Mr Osgood, as you heard, those are the only
 23 questions that were outstanding, so it only remains for
 24 me now to thank you very much for coming to give your
 25 evidence. It's very helpful to have heard from you.

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1 THE WITNESS: No problem. 215
2 SIR MARTIN MOORE-BICK: We are grateful to you for that
3 reason. You are now free to go.
4 THE WITNESS: Thank you very much.
5 SIR MARTIN MOORE-BICK: Thank you.
6 (The witness withdrew)
7 SIR MARTIN MOORE-BICK: Thank you, Ms Grange.
8 MS GRANGE: Thank you.
9 SIR MARTIN MOORE-BICK: That's, I take it, it for the day.
10 MS GRANGE: It is, and for a little while. We start again
11 in September.
12 SIR MARTIN MOORE-BICK: Exactly, yes. We're not going to be
13 sitting at all in August, and we shall resume hearings
14 on 7 September, at 10 o'clock, here.
15 MS GRANGE: Yes, thank you.
16 SIR MARTIN MOORE-BICK: Yes. Thank you very much.
17 MS GRANGE: Thanks.
18 (4.30 pm)
19 (The hearing adjourned until 10 am
20 on Monday, 7 September 2020)
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