



Grenfell Tower Inquiry

Day 140

June 7, 2021

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Phone: +44 (0)20 3008 5900

Email: transcripts@opus2.com

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1 Monday, 7 June 2021
2 (10.00 am)
3 SIR MARTIN MOORE—BICK: Good morning, everyone. Welcome to
4 today's hearing. Today we're going to start hearing
5 evidence from Janice Wray, formerly of the TMO.
6 Yes, Mr Millett.
7 MR MILLETT: Mr Chairman, thank you. Good morning, and good
8 morning, members of the panel.
9 I now call Ms Wray, please.
10 MS JANICE WRAY (sworn)
11 SIR MARTIN MOORE—BICK: Thank you very much. Now, sit down
12 and make yourself comfortable.
13 THE WITNESS: Thank you.
14 (Pause)
15 SIR MARTIN MOORE—BICK: Right. When you're ready,
16 Mr Millett.
17 Questions from COUNSEL TO THE INQUIRY
18 MR MILLETT: Thank you, Mr Chairman.
19 Ms Wray, good morning.
20 A. Good morning.
21 Q. Can I start by thanking you very much for coming to
22 the Inquiry and assisting us with our investigations.
23 We're extremely grateful to you.
24 My questions are intended to be short and simple;
25 sometimes they don't turn out that way. I'm very happy

1

1 to rephrase the question or ask it in a different way.
2 We're going to take scheduled breaks halfway through
3 the morning and halfway through the afternoons, but if
4 you need a break at any other time, just say and we can
5 take a break.
6 A. Thank you.
7 Q. Can I also ask you, please, to keep your voice up, as
8 loud as you can, so that the person who sits to your
9 immediate right can get down everything you're saying
10 very clearly and completely. Also, can I just ask you
11 not to nod or shake your head, but to say "yes" or "no"
12 as the case may be, because nods and shakes don't go on
13 to the transcript.
14 Now, you have made, I think, ten witness statements
15 to the Inquiry in all. I'm going to go through them and
16 put them formally into the record, but ask you to swear
17 to them.
18 The first was dated 7 February 2019, {TMO00000890}.
19 Is that the first page of your first statement?
20 A. Yes, that seems to be the case.
21 Q. Can we go to page 56, please. There is a signature
22 above the date of 7 February 2019. Is that your
23 signature?
24 A. It is, yes.
25 Q. Thank you.

2

1 Next one, {TMO00842341}, if we just have the first
2 page of that, please.
3 Is that the first page of your second witness
4 statement?
5 A. Yes.
6 Q. Can we turn to page 4 in that, please. There is
7 a signature above the date of 24 September 2019. Is
8 that your signature?
9 A. Yes.
10 Q. There is then {TMO00847305}, which is your supplementary
11 or third witness statement dated 20 July 2020. Is that
12 the first page of that?
13 A. It is, yes.
14 Q. Thank you. Can we please go to page 39 in that,
15 signature above the date; is that your signature?
16 A. It is, yes.
17 Q. Thank you.
18 Next one, {TMO00862589}. This is a witness
19 statement dealing with PEEPs of 24 January 2020.
20 If we go to page 3 in that, can we see your
21 signature there?
22 A. Yes.
23 Q. Thank you, above the date of 24 January 2020.
24 Next one, {TMO00873629}. Is that your statement
25 there dated 19 June 2020?

3

1 A. Yes.
2 Q. If we turn to page 20, we can see the date and the
3 signature. Again, is that your signature?
4 A. It is.
5 Q. Thank you.
6 The next one is {TMO00873934}. Is that the first
7 page of your witness statement dealing with fire risk
8 assessment queries?
9 A. Yes.
10 Q. Dated 21 August 2020. Page 25, we can see the signature
11 above that date there. Is that your signature?
12 A. It is.
13 Q. Thank you.
14 Next one, {TMO10048973}. This, I think, is the
15 first witness statement you did dealing with aftermath.
16 A. Yes.
17 Q. Yes, and that's dated, if we can go to page 10, we can
18 see your signature there, 13 March 2019.
19 A. Yes.
20 Q. Is that your signature?
21 A. It is, yes.
22 Q. Thank you.
23 Then the second aftermath witness statement at
24 {TMO00869607}. Is that the first page of that
25 statement?

4

1 A. Yes.
 2 Q. If you go to page 2, there is a signature above the
 3 date, 17 January 2020. Is that your signature?
 4 A. It is.
 5 Q. Thank you.
 6 Next one, {TMO00887083}. Is that the first page of
 7 your third aftermath statement?
 8 A. Yes.
 9 Q. If we go to page 9, is that your signature above the
 10 date of 7 December 2020?
 11 A. It is.
 12 Q. Have you read all of these statements before coming here
 13 today?
 14 A. Yes.
 15 Q. Thank you. Can you confirm that the contents of each of
 16 those statements are true?
 17 A. Yes, with one exception. On my first statement in,
 18 I think, point 82, we left out "not", which obviously
 19 changes the context quite considerably.
 20 Q. Yes, it would. Okay, we'll come back to that if we need
 21 to.
 22 Have you discussed your evidence with anybody before
 23 coming here today?
 24 A. No, I have not, but I would like to say that I wanted
 25 a little bit more information in terms of two things

5

1 specifically : notices of deficiencies , just numbers, and
 2 also the review date for our estate staff handbook, and
 3 my colleague, Adrian Bowman, still had access to that
 4 information and was able to get that for me. But
 5 I didn't discuss anything beyond getting that
 6 information. Okay.
 7 Q. Now, I would like to ask you first about your role at
 8 the TMO and your qualifications and your training.
 9 I think it's right that you have worked for the TMO
 10 since 1996.
 11 A. Yes, that's right.
 12 Q. At the time of the Grenfell Tower fire on 14 June 2017,
 13 you were the health, safety and facilities manager for
 14 the TMO.
 15 A. I was, yes.
 16 Q. And you held that role since 2011.
 17 A. That's right.
 18 Q. Is it right that, since 1 March 2018, your role has
 19 changed and you're now head of facilities management at
 20 RBKC?
 21 A. Yes, although I'm actually on secondment at the moment
 22 working on COVID-related issues.
 23 MR MILLETT: Right.
 24 Can I ask you to keep your voice up a little bit and
 25 perhaps slow down a bit, because I'm not hearing your

6

1 answers.
 2 Mr Chairman, I don't know whether the transcript is
 3 keeping up with the answers. Mine isn't, but that may
 4 be me.
 5 SIR MARTIN MOORE-BICK: I think it is. Has yours stalled?
 6 MR MILLETT: Mine has stalled.
 7 SIR MARTIN MOORE-BICK: Well, if you refresh it — I'm sure
 8 you know how to —
 9 MR MILLETT: I do, I will do that.
 10 SIR MARTIN MOORE-BICK: — you may find you will be
 11 all right.
 12 MR MILLETT: It's now not stalled.
 13 Could you explain for us, please, your role at the
 14 time of the fire on 14 June 2017 in very brief terms?
 15 What did it entail?
 16 A. Okay. I had — my previous job title was health and
 17 safety adviser. My job title changed whenever I took
 18 responsibility for facilities , because we were using
 19 external offices and we needed to have somebody who
 20 undertook that work for us. My health and safety
 21 responsibilities didn't change at that point in time.
 22 It was very much an advisory role, to provide advice and
 23 guidance to all the colleagues across the organisation
 24 in terms of health and safety. That would include
 25 fire safety, I had oversight of the fire risk assessment

7

1 process, we investigated accidents, we managed asbestos,
 2 quite a range of things, really. We produced an annual
 3 report —
 4 Q. Now, I want to ask you about your qualifications for
 5 that role.
 6 Can we go to your first statement, please, at page 2
 7 {TMO00000890/2}, paragraph 6.
 8 You say there that when you joined RBKC in 1986, you
 9 started working as a health and safety administrator in
 10 the housing department, and at that time you completed
 11 a diploma and a certificate from the National
 12 Examination Board in occupational safety and health —
 13 A. That's right.
 14 Q. — otherwise known as NEBOSH.
 15 When did you receive your diploma, do you remember?
 16 A. I think it was possibly 1989. I can't be absolutely
 17 sure, but it was a very long time ago.
 18 Q. After you had received that diploma, did you obtain any
 19 other qualifications relevant to your role in health and
 20 safety?
 21 A. No. I did a management NVQ at level 5, but not
 22 specifically health and safety, no.
 23 Q. Since then, did you ever undertake any refresher
 24 training based on new standards in order to make sure
 25 that that qualification was kept up to date?

8

1 A. Yes, yes. I'm a chartered member of the Institution of
 2 Occupational Safety and Health, and to sustain that I'm
 3 obviously required to do a significant amount of
 4 continuing professional development and to keep that
 5 updated, and it's audited regularly. So there is
 6 a requirement to do that, but actually, obviously,
 7 I would prefer to be informed of what's current. So
 8 quite a lot.
 9 Q. If you look down the page, you will see paragraph 8, and
 10 it says:
 11 "For most of my career, I have been a Chartered
 12 Member of the Institution of Occupational Safety and
 13 Health ('CMIOSH')."
 14 A. Yeah.
 15 Q. Can you help us, when did you become a member of that
 16 organisation?
 17 A. Whenever I've been a member since I started — undertook
 18 my — sorry, I beg your pardon. I've had a role —
 19 an affiliate role, I think, until I got my diploma, and
 20 then the post experience after my diploma, probably
 21 a couple of years later I became chartered. So I've
 22 been chartered for a considerable time.
 23 Q. And you say that you have to do continuing professional
 24 development in order to keep that membership up.
 25 A. Yes.

9

1 Q. Is that annual or more than annual?
 2 A. It's fluctuated. It used to be on a three-yearly cycle,
 3 but they would send you reminders promptly, but
 4 basically annual, yes.
 5 Q. Would it be desktop, done privately by you, or would you
 6 go to events, seminars —
 7 A. It would be arranged — sorry to talk over you. It
 8 would be a range of things. It could be seminars, it
 9 could be briefing, it could be demonstrating some skill
 10 that I've — you know, if I've written a new policy or
 11 procedure that we haven't done before or if we've
 12 amended things. Probably the first time we drafted
 13 an annual report, I would have submitted that as
 14 something that we hadn't previously done, but there's
 15 a fair bit of engagement with other colleagues or —
 16 sorry, excuse me.
 17 Q. Are you still a member?
 18 A. Yes, I am.
 19 Q. You are.
 20 Did you undertake any particular training in order
 21 to carry out your role?
 22 A. It was ongoing. I mean, I was a general health and
 23 safety practitioner, so I needed to know about quite
 24 range of employee-related, resident-related and some
 25 construction-based —

10

1 Q. Right.
 2 A. — work, really, activities, be able to assess those, to
 3 carry out risk assessments, carry out inspections,
 4 produce policies, procedures, reports, a variety of
 5 things, really. So I needed quite a broad range of
 6 knowledge and skills and experience, and I would target
 7 the ones which I felt were perhaps depleted or where
 8 legislation was perhaps changing, and I would look for
 9 the most appropriate training to suit that.
 10 Q. Right, I see.
 11 Can we go to page 37 of this statement
 12 {TMO00000890/37}, please, and look at paragraph 166.
 13 You say there:
 14 "Since 2005, the relevant fire safety legislation
 15 has been the Regulatory Reform (Fire Safety) Order 2005
 16 (RRO). I recall receiving training on this legislation
 17 from one of the fire authorities and via professional
 18 journals when it was introduced."
 19 Pausing there, what did that training involve?
 20 A. It would have been briefing on the requirements of the
 21 RRO; it would have gone through the different articles;
 22 it would have identified the need for a responsible
 23 person, what that responsible person would look like,
 24 who relevant persons could be; what areas of what kinds
 25 of premises would be covered by the RRO; who would be

11

1 the enforcement authority. It would be quite
 2 comprehensive.
 3 It's so long ago. I know I went to several, and
 4 some were hosted by the fire authority, some were
 5 probably hosted by my institution, but I certainly
 6 attended a variety of courses on that because it was
 7 very important.
 8 Q. Yes. Was that training regularly refreshed, either by
 9 the relevant fire authority or the professional journals
 10 that you read?
 11 A. There were always opportunities to go on refresher
 12 courses. What I would say is I also participated in —
 13 there was some London and South East — initially it was
 14 a health and safety group for kind of public sector
 15 health and safety housing professionals, and then it was
 16 followed on by a specific dedicated fire safety group,
 17 and I would — we would perhaps meet quarterly, and it
 18 was a really useful forum for similar people in similar
 19 kinds of organisations to say what was going well or
 20 where they had issues or, you know, if there was
 21 consistent enforcement from their Fire Brigade. So
 22 there were different ways, really, and I would see that
 23 as being a bit of continuing professional development as
 24 well.
 25 Q. Did this specific, dedicated fire safety group have

12

1 a formal name?
 2 A. I think it was called the London and South East
 3 Fire Safety Group, but it probably morphed slightly as
 4 the years went by.
 5 Q. Who gave training? What kinds of people gave training?
 6 A. Training. Well, for example, after Lakanal,
 7 David Crowder from BRE, he came and — the lady who
 8 mostly was the chair was called Sarah Stevenson—Jones,
 9 and she was health and safety manager at Westminster
 10 City Council in their housing department, so she was
 11 quite proactive about going out, and sometimes it would
 12 be senior members from the Fire Brigade, from their
 13 policies or enforcement. Sometimes it would just be
 14 meetings to discuss specific issues, but there was
 15 ongoing opportunities for — sometimes it would be
 16 people who wanted you to buy their product, a variety
 17 of ...
 18 Q. Yes.
 19 You say you're a member of IOSH. Are you still?
 20 A. Yes.
 21 Q. Were you required, as a member, to undertake continuing
 22 professional development, CPD?
 23 A. Yes.
 24 Q. What form did that take?
 25 A. A variety, either formal training, it could be

13

1 briefings, it could — to some extent it could be
 2 attending — there was sort of a local IOSH group for my
 3 sector which met in London and had different themes,
 4 different speakers. So a variety of things, really, and
 5 some —
 6 Q. And — I'm so sorry.
 7 A. No, that's fine.
 8 Q. Did any of it relate to fire safety specifically?
 9 A. Yes, most likely it did.
 10 Q. Again, did you go as a member of IOSH to seminars,
 11 conferences, events, or was it purely or largely desktop
 12 learning privately?
 13 A. No, no, I would have gone as a member of IOSH, because
 14 often there were opportunities to plug into things that
 15 they were running, which were the most appropriate.
 16 Sometimes they weren't always housing-related, and
 17 sometimes there was an alternative type of training
 18 which was more appropriate to our work environment. It
 19 was a judgement call, really.
 20 Q. Right.
 21 You mentioned Lakanal House in your evidence
 22 a moment ago.
 23 A. Yes.
 24 Q. Can we look at your fourth statement, please,
 25 {TMO00862606}, where you set out details, at page 1

14

1 there, of a presentation —
 2 A. Yes.
 3 Q. — of Lakanal House by David Crowder. You have
 4 mentioned that a moment ago. I will examine that
 5 a little bit more closely.
 6 Before I do, just in general, you referred to the
 7 London and South East fire strategy working group, and
 8 I think you have covered that at paragraph 8 of your
 9 first statement as well. There is no need to go to it.
 10 My question on that is: did you, at those meetings,
 11 ever get involved in any discussion or have any training
 12 on specific issues relating to fire safety strategies in
 13 high-rise buildings?
 14 A. I think what I recall is that David Crowder's
 15 presentation was very specific around what had led to
 16 Lakanal and how the fire had progressed, and what were
 17 the things that we needed to take away and reflect on.
 18 So I think inevitably, because of the nature of the
 19 block and the height of the block, there will have been
 20 things that related directly, but it was much more
 21 focused on Lakanal, rather than being a general sort of
 22 dialogue.
 23 Q. But in general terms, what you learnt from the London
 24 and South East Fire Safety Group, did that involve
 25 anything about fire safety strategies in high-rise

15

1 blocks?
 2 A. Yeah, well, we would have had regular discussions about
 3 how we were all trying to adhere to the legislation and
 4 how we were addressing that, so I would have known what
 5 other people in the sector were doing. Ultimately, with
 6 the purpose-built flat guide, when that was published,
 7 they were pretty much all adhering to that, because the
 8 high-rise were purpose-built. But, yeah, we would have
 9 had regular dialogue on those issues.
 10 Q. What about cladding, cladding of the exterior of the
 11 building, or building envelopes? Do you remember having
 12 any discussion or any training in relation to that
 13 specific topic?
 14 A. Only in very general terms, that it was something that
 15 needed to be looked at, and that there were a number of
 16 fires across the world where there were problematic —
 17 there were problems with cladding if it wasn't fire
 18 rated.
 19 Q. You call them fires across the world; do you remember
 20 discussion at the London and South East Fire Safety
 21 Group about those specific fires in particular?
 22 A. Not really, sorry.
 23 Q. Right. We will come back to that in due course.
 24 Sticking with the statement on the screen as we have
 25 it, you say at paragraph 3 that:

16

1 " ... a presentation was given by David Crowder on
2 the Lakanal House fire to the RBKC and TMO staff. This
3 was organised by Laura Johnson and held at the
4 Kensington Town Hall. A list of those who were invited
5 can be found in the email ..."

6 And you exhibit it.

7 Was that on 10 January 2014?

8 A. Yes, I believe so.

9 Q. Yes.

10 As you say in paragraph 4:

11 "My recollection is that David Crowder had already
12 given this presentation twice before, once to the
13 London and South East Fire Safety Group, which
14 I attended, and once to London Housing Directors group
15 which included Laura Johnson."

16 Are those the meetings that you have just referred
17 to in your evidence this morning?

18 A. Yes.

19 Q. I see.

20 Do you remember whether you received a handout or
21 any written or photographic presentational material at
22 any of those meetings?

23 A. I don't recall, but actually, I have a feeling that
24 I also attended a similar briefing at Savills, and I may
25 have had a handout at that stage.

17

1 Q. Right.

2 A. Sorry, I think I must have missed that from my
3 statement. It was the same presentation. I think there
4 may have been a handout at that stage.

5 Q. Savills?

6 A. Yes.

7 Q. As in the estate agents?

8 A. Yes.

9 Q. Do you remember when?

10 A. It will be about the same time, because he was — it was
11 a December. I think it was possibly the December
12 before, whatever year that was.

13 Q. 2013, that would have been.

14 A. Yes, yes.

15 Q. Can you remember, in a nutshell, if you can, what you
16 learnt from these presentations on Lakanal House?

17 A. Immediately after the fire, what we learned was that the
18 block had a scissor construction, and we investigated
19 immediately to see whether we had any blocks of
20 a similar construction and fortunately we did not.

21 There were issues about how the evacuation strategy
22 was communicated to residents. There were issues about
23 the fire safety guidance that was provided by the
24 Fire Brigade call handlers. There were concerns about
25 remedial works had been undertaken and not to

18

1 fire resisting standard. I — there were a range of
2 things that I do recall.

3 Q. Now, you referred to the Savills seminar. I think you
4 do actually cover this, you do yourself an injustice.

5 If you turn to page 2 {TMO00862606/2} and look at
6 paragraph 8, there is a heading, "Savills Fire Safety
7 Seminar", and you have produced some documents for that,
8 for a seminar you attended on 5 December 2013, and you
9 say that it included presentations, can you see?

10 A. Yes.

11 Q. " ... on Lakanal House and Shirley Towers, as well as
12 a case study of a rest home. The presentation on
13 Lakanal House was again presented by David Crowder."

14 Did that presentation cover fire risk management of
15 residential premises, do you recall?

16 A. To some extent, inevitably, but I think it focused
17 largely on the technical aspects of what had happened on
18 the day in both — in all of the specific fires.

19 Q. Right.

20 Panning out, then, a little bit, did any of your
21 training at any time up to June 2017 concern fire risk
22 assessments?

23 A. Yes.

24 Q. What?

25 A. Well, quite a lot of my CPD. Obviously the Regulatory

19

1 Reform Order, when it came in, introduced the
2 requirement for fire risk assessments in communal areas,
3 which was an entirely new concept, so there would have
4 been quite a lot of formal and informal briefings and —
5 around that. Sorry, I wasn't specific. I assumed —
6 when we talked about Regulatory Reform, I wasn't
7 specific when I should have been.

8 Q. No, that's all right.

9 Let me be more specific: did any of your training
10 include the specific guidance prepared by the Government
11 on fire safety and risk assessments, such as the 2006
12 Sleeping Guide?

13 A. I believe so, but I can't remember the detail.

14 Q. Let me just put it up for you to see if it jogs a
15 memory, {RBK00036722}, please.

16 This is the first page. It doesn't tell you much,
17 other than it's orange, but if we pan out, you can see
18 the whole thing.

19 A. Okay. I am familiar with the Sleeping Guide.

20 Q. You are familiar with the Sleeping Guide?

21 A. Yeah, sorry, sorry, I just can't — I'm sure I would
22 have had a briefing on it at least on one occasion, but
23 I can't remember the detail. Apologies.

24 Q. Right, okay. Can we assume, then, in the course of your
25 evidence, that you were familiar with its terms?

20

1 A. Reasonably, yes. Obviously I'm not a fire safety
2 professional, but, yeah, reasonably.
3 Q. No. Well, absolutely.
4 The next document is, as you've referred to, the
5 Local Government Association guidance on high-rise
6 buildings called "Fire safety in purpose-built blocks of
7 flats", published in, I think, July 2011.
8 Let's have that up, please. It's {HOM00045964}.
9 Again, an all too familiar front page and the colouring,
10 but you remember being familiar with that document?
11 A. Yes, I had a copy of it on my desk.
12 Q. Again, can we proceed on the basis that you were
13 familiar with it?
14 A. Yes.
15 Q. And having a copy on your desk would have made you
16 extremely familiar with it, yes.
17 The next one is something called PAS 79, or
18 Publicly Available Specification 79.
19 A. Yes.
20 Q. Were you familiar with the versions published in
21 particularly 2007 and 2012?
22 A. I was, but, again, I'm not a fire safety professional,
23 so I wouldn't have known it nearly as well as I would
24 have known purpose-built flats --
25 Q. All right. Well, we will come back to that. Just for

21

1 reference purposes, that's {CTA00000003}.
2 Did you have any specific training on the LGA guide?
3 A. Yes. In fact, the LGA guide was produced after quite
4 a lot of consultation across the sector, and I was
5 consulted. I went to at least one briefing with other
6 similar health and safety housing individuals. We were
7 able to raise issues that we had, things that we felt
8 needed to be included, and in the course of preparing
9 for this, I found an email I sent with some of the
10 issues that I felt needed to be incorporated.
11 So, yeah, we knew it was coming, we'd been consulted
12 fairly widely, and then, when it was finalised, there
13 was an introductory seminar, I believe, which might have
14 been Colin Todd himself or some of his colleagues who
15 presented it. So, yes.
16 Q. We may pick this up later on, but do you remember what
17 specific issues or matters you wanted to see reflected
18 in this guide as part of that consultation process?
19 A. Actually, one of my points was to do with interim
20 measures. We were finding that when we -- in situations
21 where we were not able to complete works within the
22 timeframe that -- and depending on the nature, sometimes
23 we would have had -- we would have advised the
24 Fire Brigade and they would be looking for interim
25 measures, but actually it was sometimes quite difficult

22

1 to establish what they meant by that. So I think I was
2 looking for some guidance about -- just even some very
3 general guidance about what would be appropriate,
4 depending on which piece of plant or equipment would be
5 temporarily out of use. So that was certainly one of
6 the areas.
7 I think I also sought information about the less
8 able-bodied residents and what we needed to do to --
9 you know, how far do we need to go, what can we do to
10 assist residents in purpose-built blocks of flats.
11 Q. Did you get an answer to that question?
12 A. No. I think what happened was they were seeking things
13 for inclusion, so it was sort of a series of emails
14 people were sending off, "It would be helpful if you
15 could include this, this and this", but we didn't really
16 get answers. The guide got produced.
17 Q. In relation to PAS 79, did you get any training at any
18 stage specifically on the September or August 2012
19 edition of that?
20 A. I don't believe I did.
21 Q. No.
22 Were you also familiar with something called the
23 "Means of escape for disabled people guide", March 2007?
24 A. To some extent, but not hugely.
25 Q. What about the LACORS, "Housing -- fire safety. Guidance

23

1 on fire safety provisions for certain types of existing
2 housing", which was 2008?
3 A. Yes.
4 Q. You did. Did you get training on that?
5 A. Probably, but again, I can't remember the detail.
6 Q. Just for reference purposes, that's {CST00002516}.
7 What about BS 9991, the 2015, "Fire safety in the
8 design, management and use of resident buildings", do
9 you remember that?
10 A. Again, I would have had an overview of it but not
11 detailed knowledge.
12 Q. Right, okay.
13 Now, can we go back to your first statement, please,
14 at {TMO00000890/37}, paragraph 166.
15 We looked at the first part of that and paused.
16 Let's look at the last sentence together. You say
17 there:
18 "My understanding has always been that the
19 'Responsible Person' for the RBKC's tenanted stock, as
20 defined in that Order, was both RBKC and the TMO."
21 How did you come to that understanding?
22 A. I think partly it was my interpretation of the
23 legislation, and partly because we were the managing
24 agents, so in the first instance we had operational
25 day-to-day control, so very clearly we were a

24

1 responsible person; however, the tenants and the
 2 leaseholders, their tenancy and their leasehold
 3 agreement was with RBKC, who still were the freeholder
 4 for the building. Depending on budgets and — there
 5 were some budgetary issues and policy issues that we
 6 would have had to defer to RBKC on. And, actually, it
 7 was probably, specifically in relation to fire risk
 8 assessments — no doubt you will ask me about this —
 9 but in 2009 we'd had protracted discussion with the
 10 Fire Brigade and RBKC which resulted in us tendering for
 11 a fire consultancy partner to undertake fire risk
 12 assessments, and that was very much a joint initiative.
 13 And, in fact, the progress meetings that happened after
 14 the appointment of the contractor for a few years still
 15 involved RBKC colleagues coming to sit in the programme,
 16 and I believe they funded it, also, our initial
 17 assessment. So there were various factors that
 18 I thought indicated that we were both —
 19 Q. And the colleagues you're talking about, people like
 20 Ann Muchmore?
 21 A. Yes.
 22 Q. I see. We will come to look at those documents in due
 23 course.
 24 You just said a moment ago it was your
 25 interpretation; was that just as a result of reading the

25

1 text of the legislation, or was that as a result of
 2 things you learnt from colleagues about how it should be
 3 interpreted?
 4 A. I can't really recall, to be honest. No one ever
 5 questioned me on it, and it was always included in my
 6 annual report, which went, I believe, to the council as
 7 well as to our board. Quite a lot of — for a period of
 8 time, I was having to do very regular updates for board,
 9 and I would invariably say for the purposes of the RRO,
 10 and no one ever challenged me, so I therefore assumed
 11 that what I was saying was appropriate — was right.
 12 Q. I see.
 13 Do you remember ever having any specific discussion
 14 with anybody at RBKC along the lines of: RBKC is or is
 15 also the responsible person?
 16 A. I don't, but I would have had regular — I did have
 17 regular dialogue with the corporate health and safety
 18 manager, and obviously that person changed over the
 19 years, but certainly Gary Mann is someone who was there
 20 for several years. We would meet regularly and he would
 21 be wanting to know what we were working on, if we had
 22 any issues. I can't say I recall discussing it with
 23 him, but he was also someone who would have had copies
 24 of our annual report and would have been kept up to date
 25 with what was happening with fire risk assessments.

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1 So, in answer to your question, I don't think I did,
 2 but I wasn't making a secret of that being my
 3 understanding.
 4 Q. How did you understand that the joint responsibility of
 5 RBKC and the TMO as responsible persons worked in
 6 practice?
 7 A. I think, in practice, because the TMO had operational
 8 day-to-day control, then, you know, we were doing the
 9 lion's share, understandably, because we were in the —
 10 we were in that position, but there were areas where we
 11 deferred to RBKC sort of latterly. Whenever we were
 12 looking to have an installation programme for
 13 self-closers, and when we were looking to have
 14 an inspection programme for the same, we had to raise
 15 that with RBKC.
 16 Q. I see.
 17 A. So it was sort of a bit policy, a bit budgetary.
 18 Q. Right.
 19 A. Yes.
 20 Q. I see. And in general terms, when one is looking at the
 21 fire risk assessment programme —
 22 A. Yes.
 23 Q. — how was the responsibility as the responsible person
 24 to be shared as between the TMO and RBKC?
 25 A. In truth, that mostly sat with us. I was the one who

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1 had drafted the programme of properties that needed to
 2 be inspected, identified the timeframes, allocated those
 3 to the assessor, and I received the fire risk
 4 assessments back and allocated the actions.
 5 They came to progress meetings and they kept a kind
 6 of watching brief, and would want updates in terms of
 7 mid-year reviews and annual reports to scrutiny.
 8 Sometimes I would be asked to attend scrutiny about
 9 specific issues, perhaps fire safety issues, but
 10 generally the lion's share sat with TMO.
 11 Q. Right.
 12 Let me ask it this way: you have told us that RBKC
 13 had involvement and oversight in relation to
 14 fire safety, and specifically the fire risk assessment
 15 programme.
 16 A. Yes.
 17 Q. Why did you think that that gave them a legal
 18 responsibility jointly with or together with the TMO as
 19 the responsible person under the legislation?
 20 A. I think because they were still the freeholder for the
 21 building and because the tenants had a tenancy agreement
 22 with the council and not with the TMO, and the
 23 leaseholders had a leasehold agreement with the council,
 24 so —
 25 Q. Was this question of joint — I'm so sorry, I cut across

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1 you, it's my fault.

2 A. No, sorry.

3 Q. Was this question of joint or shared responsibility as
4 the responsible person ever discussed by you in any of
5 your fora or group meetings or training sessions you
6 ever attended so that you could see that reflected in
7 other boroughs?

8 A. I don't recall that being the case, apologies.

9 Q. I'm going to change topic now and ask you about
10 an agreement in 2010, or discussion, with the LFEPA.

11 Can we start, please, by looking at {RBK00001176}.

12 This is email correspondence, and the one at the top
13 of the page is dated 16 December 2010 between you and
14 Laura Johnson, director of housing at RBKC, and you're
15 talking about proposed wording from Kevin Thompson, who
16 was environmental health at RBKC, for the joint working
17 protocol, which was produced by the fire safety working
18 group, which would set out the responsibilities of the
19 TMO and RBKC for fire safety. So that's the context.

20 If we go to page 2 of this email run
21 {RBK00001176/2}, and we look at the two bullet points
22 towards the bottom of the page, "What will RBKC do?",
23 this is Kevin Thompson's proposed wording, and it says
24 this:

25 "■ 'Kensington and Chelsea TMO will undertake the

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1 monitoring and inspection of premises they manage to
2 ensure adequate fire safety in compliance with their
3 duty under The Regulatory Reform (Fire Safety) Order
4 2005.' ...

5 "■ 'RBKC cannot enforce in premises it owns but
6 where deficiencies are identified it will seek to ensure
7 that the Kensington and Chelsea TMO comply with their
8 contractual obligations and legal responsibilities under
9 the Regulatory Reform (Fire Safety) Order 2005 to ensure
10 adequate fire safety ..."

11 Then he goes on, does Kevin Thompson, to note to
12 Laura Johnson:

13 "The first bullet point merely reflects the
14 requirements of the law applicable to the TMO so brings
15 nothing new. However, the second point puts a clear
16 onus on the Council. This is surely something we want
17 to do anyway but could I have your comments please. The
18 bulk of the protocol is good news for the private sector
19 and I am keen to have us sign up to it but am conscious
20 of this obligation in relation to the TMO stock."

21 Did you share Kevin Thompson's understanding that
22 the onus was on the council to ensure that the TMO
23 complied with its legal obligations and responsibilities
24 under the RRO?

25 A. To some extent, yes. I mean, we were very clear of our

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1 obligations and we were endeavouring to comply with
2 them, but, as I said, I thought that RBKC were also
3 responsible persons and also had their own degree of
4 responsibility. So if that meant making sure that we
5 were doing what we needed to be doing, then yes.

6 Q. Can we then turn to the protocol itself. This is at
7 {LFB00032248}. I'll show you the first page of this
8 document. There it is, protocol between LFEPA and RBKC.

9 If we go to page 8 {LFB00032248/8}, we can see the
10 signatures. You can see, at the bottom, Paul Morse's
11 signature, director of environmental health for RBKC,
12 17 November 2011. Then above that, the signature of
13 Steve Turek, AC for the LFEPA, 20 February 2012.

14 Did you receive this final signed version, do you
15 think?

16 A. I think I probably did.

17 Q. Can we go to page 4 {LFB00032248/4}, please, at the
18 bottom, and you will see what's recorded there, under
19 item 4:

20 "What will The Royal Borough of Kensington and
21 Chelsea do?"

22 I'll just show this to you:

23 "■ RBKC will undertake, in line with their statutory
24 requirements, the monitoring and inspection of premises
25 identified in Section 3 of this protocol.

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1 "■ RBKC will undertake the monitoring and inspection
2 of their own premises to ensure adequate fire safety
3 standards.

4 "■ RBKC will enforce fire safety standards in
5 accordance with the provisions of the Housing Act 2004
6 and the HHSRS, having regard to relevant documents
7 published by the Government including, 'Fire Safety Risk
8 Assessment: Sleeping accommodation ..."

9 Over the page {LFB00032248/5}:

10 "... and in accordance with any guidance jointly
11 agreed with LFEPA.

12 "■ RBKC will, when taking enforcement action under
13 the Housing Act 2004, have regard to the Fire Safety
14 Order.

15 "As RBKC cannot enforce in its own premises it will
16 ensure that when deficiencies are identified it takes
17 appropriate action in a timely manner to ensure
18 acceptable fire safety standards are maintained and
19 achieved in these premises."

20 Then:

21 "■ Although RBKC may offer a suitable means of
22 complying with fire safety requirements, it will also:

23 "— Ensure guidance accompanies all statutory notices
24 informing owners/landlords of the need to undertake
25 their own fire risk assessment.

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1 "— Ensure that in any relevant notice, the schedule
2 of work is drafted in such a way as to offer the
3 owner/landlord the opportunity to bring forward
4 alternative means of complying in accordance with their
5 own fire risk assessment.
6 "— Where such alternatives are brought forward by
7 the owner/landlord, RBKC will consult with LFEPA."
8 Then it continues about consultation and data,
9 et cetera, and you can read that.
10 Now, just looking at that, there is no reference
11 there, is there, to the TMO?
12 A. No.
13 Q. No. Do you know why Kevin Thompson's suggested
14 amendments weren't carried through into the final draft?
15 A. Sorry, I've absolutely no idea.
16 Q. Did this protocol reflect your understanding of RBKC's
17 responsibilities to ensure monitoring and inspection of
18 their own premises?
19 A. No, not really.
20 Q. It didn't?
21 A. No. I'm wondering whether I did get the final version,
22 because the draft that you showed me with those two
23 bullet points, I thought they were what were included.
24 Q. Oh, right.
25 A. Perhaps I didn't even get it, sorry.

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1 Q. Do I take it from that that this document, the final
2 version, did not reflect your understanding of the way
3 in which RBKC had assumed its own responsibilities, at
4 least in this protocol?
5 A. No, this seems to work for — in terms of environmental
6 health and the normal HMOs and things that they're
7 enforcing against, but it's not very clear in terms of
8 housing, is it?
9 Q. Right. Did you not want to see the final version of
10 this document?
11 A. Yes, I would have wanted to.
12 Q. Can you explain why you might not have done?
13 A. No.
14 Q. Right.
15 A. Sorry, no.
16 Q. In general terms, how did you understand that RBKC
17 fulfilled their responsibilities under the protocol, so
18 far as you understood it, in respect of premises managed
19 by the TMO?
20 A. I — in terms of my relationship with RBKC, I would meet
21 regularly with the corporate safety manager and we would
22 have a range of discussions and I would update him.
23 I would be asked to provide updates for their mid-year
24 reports and year-end reports to scrutiny. I would be
25 asked for information.

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1 Depending on — some areas RBKC got very involved
2 in, for example we had issues with leaseholder doors and
3 enforcement of leaseholder doors, and ensuring that
4 whatever we did, we could address potentially
5 non-compliant leaseholder doors, and RBKC were very
6 involved in that, their legal team and their housing
7 team. So some areas, lots of engagement, and other
8 areas, they were sort of asking for updates, asking for
9 me to give them position statements. So a bit of both,
10 really.
11 Q. Do I take it from that that your understanding of the
12 way RBKC fulfilled their responsibilities under the
13 protocol was topic by topic; in other words, there were
14 some areas where they were very involved and some areas
15 where they weren't?
16 A. I suppose.
17 Q. That's the flavour I'm getting from your evidence; is
18 that accurate or fair?
19 A. Yeah. I would say certainly for a long time they —
20 most of the time they were very eager to know how we
21 were doing with fire risk assessments and if there were
22 any issues. They knew when we'd done door replacement.
23 There were quite a lot of areas that they were
24 monitoring and quite a lot of areas that they were
25 asking for information on, but possibly — but

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1 definitely focusing more heavily on some areas than
2 others.
3 Q. Can we go to {TMO00830598}. I'll show you the first
4 page and the last page. This is the first page. It's
5 entitled "TMO Fire Safety Strategy".
6 If we go to page 15 {TMO00830598/15}, we can see
7 there is a date and a name. The name is yours and the
8 date is November 2013.
9 A. Yeah.
10 Q. Did you draft this?
11 A. It was drafted in consultation with colleagues, but
12 I had oversight of producing the final version, yes, and
13 it would have gone to our health and safety committee
14 for approval.
15 Q. Can we go back to page 1 {TMO00830598/1}, please,
16 paragraph 2.2, under "Legislation", the very foot of the
17 screen:
18 "For the purposes of Fire Safety legislation,
19 specifically the Regulatory Reform (Fire Safety) Order
20 (FSO), RBKC and the TMO are considered to be
21 'responsible persons' and as such must ensure that
22 'suitable and sufficient' fire risk assessments are
23 carried out in the communal areas of all the residential
24 blocks."
25 First, did RBKC approve that statement?

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1 A. No, I don't believe they did.
 2 Q. Do you think they ever saw it?
 3 A. I'd be surprised if they hadn't, but I don't believe
 4 they did.
 5 Q. Do you remember whether there was any discussion of that
 6 statement there with RBKC?
 7 A. No, I don't recall there being one.
 8 Q. We will come back to these documents in due course,
 9 Ms Wray, but I want to turn now with you to the
 10 structure within the TMO for managing health and safety
 11 generally, and fire safety in particular.
 12 Can we start, please, at page 37 of your first
 13 witness statement, {TMO00000890/37}, paragraph 167. You
 14 say this:
 15 "As at 14 June 2017, there was one other Assistant
 16 Safety Advisor, Adrian Bowman, who had been with the TMO
 17 for many years. Adrian also held a NEBOSH Certificate
 18 and membership to the Institution of Occupational Safety
 19 and Health. I reported to Barbara Matthews, who was the
 20 TMO Director with ultimate executive responsibility for
 21 health and safety, and Adrian Bowman reported to me.
 22 Prior to Barbara joining the TMO in 2015, I reported to
 23 Anthony Parkes, who was Barbara's predecessor. The
 24 Facilities Coordinator, Cyril Morris, also reported to
 25 me and had done so since joining the TMO in 2011."

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1 And I think you confirmed that that's correct, what
 2 you have set out there?
 3 A. Yes.
 4 Q. Now, at paragraph 168 you say this:
 5 "I have never been a member of the TMO Executive or
 6 Senior Management Teams. The reports I prepared on
 7 safety performance described below would usually be
 8 presented at Executive and Board meetings by members of
 9 the Executive Team."
 10 Who was it who reported on health and safety issues
 11 to the senior management team?
 12 A. So I reported to Barbara, Barbara Matthews, and the —
 13 our health and safety committee was chaired by
 14 Barbara Matthews, and also had Sacha Jevans on it, and
 15 they reported directly in to the executive team. So
 16 actually any discussions above my level were usually —
 17 I might have prepared it, but Barbara would have
 18 presented it.
 19 Q. Before Barbara arrived in, is it, July 2015 —
 20 A. Yes.
 21 Q. — it would have been Anthony Parkes, would it?
 22 A. Yes, yes it would.
 23 Q. Right.
 24 You were a team leader who reported to a member of
 25 the executive team. As I say, that's Anthony Parkes and

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1 then Barbara Matthews?
 2 A. Yes.
 3 Q. Did they present the reports, so far as you know, that
 4 you had prepared on safety performance to members of the
 5 executive team?
 6 A. To the best of my knowledge, yes.
 7 Q. Yes.
 8 Now, if we go, please, to {TMO10031074}. This is
 9 a document called "Health and safety policy", TMO health
 10 and safety policy, and if you look at the bottom of
 11 page 1 there, it's signed by Robert Black, chief
 12 executive, April 2012.
 13 Can we go to page 3 in that document
 14 {TMO10031074/3}, please, and go to paragraph 2.7. That
 15 there sets out the responsibilities of the health,
 16 safety and facilities manager, which was you, wasn't it?
 17 A. Yes.
 18 Q. Looking at that — I'm not going to read it all out —
 19 it's a series of bullet points. Casting your eye down
 20 the list, was that an accurate description there of your
 21 responsibilities?
 22 A. Erm ... Yes. Yeah.
 23 Q. So did you have responsibility for the overall
 24 definition and design of the TMO's fire risk management
 25 system?

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1 A. Yeah, but again, that would have been in consultation
 2 with other colleagues.
 3 Q. Which other colleagues, please?
 4 A. Well — so the assessment, when — what we ended up with
 5 was when the assessment came in, it came to me. The
 6 actions were allocated to various teams, most of which
 7 were in the operational division, so I'm not going to
 8 set out something that doesn't work for them in the way
 9 that it flows through, so it could have been — it
 10 probably was executive team members, but also
 11 particularly heads of services in the operations team.
 12 So it would have been housing management, repairs and
 13 contract management particularly.
 14 Q. I think we may be slightly at cross—purposes.
 15 A. Sorry.
 16 Q. I think your answer was relating specifically to actions
 17 in response to a fire risk assessment, but I'm asking
 18 you a more general question. Obviously that includes
 19 that, but looking at the list of bullet points there —
 20 A. Yes.
 21 Q. — can we take it that you had responsibility for the
 22 overall definition and design of the TMO's fire risk
 23 management system, which would include but wouldn't be
 24 limited to FRAs?
 25 A. Okay. I would be in a position to propose and that

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1 would go to health and safety committee and to my
 2 executive director with health and safety
 3 responsibility, and the decision on something like that
 4 would have been made at that level. But it would have
 5 been me who would have been drafting and making
 6 suggestions and recommendations.
 7 Q. Yes, I see.
 8 A. Okay.
 9 Q. So can we take it that, subject to your qualification
 10 about decision-making, it was you who held the primary
 11 operational responsibility for health and safety at the
 12 TMO?
 13 A. Yes and no, because obviously health and safety is
 14 devolved to everybody, everybody's got responsibilities,
 15 and our policy statement made it very clear that, in the
 16 first instance, managers had responsibility, and they
 17 could come and get advice from myself and my colleague,
 18 Adrian, and they did, so — and we have an executive
 19 director with health and safety responsibility and we
 20 have a chief exec who's got — so I think I don't see it
 21 that way, I see it as being more of a shared
 22 responsibility, then yes, we were there to advise and to
 23 guide and to be consulted.
 24 Q. My question was with the emphasis on the word
 25 "operational". Let me see if I can be a bit more

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1 specific.
 2 If you look at the last two bullet points in that
 3 list, you can see that it says:
 4 "■ advising on compliance with the Regulatory Reform
 5 (Fire Safety) Order 2005;
 6 "■ attending relevant internal and external meetings
 7 and committees as necessary to update them on TMO
 8 performance in relation to specific areas of health &
 9 safety e.g. compliance with the Regulatory Reform (Fire
 10 Safety) Order 2005."
 11 Did you understand that you were the TMO person with
 12 primary operational responsibility for ensuring that the
 13 TMO complied with its legal obligations as the
 14 responsible person under that legislation?
 15 A. The reason I'm hesitating is because so much of it was
 16 outside my control. I recognise these responsibilities
 17 and — but a lot of these were met by me having to chase
 18 and cajole and harangue people who had responsibilities.
 19 Once they're allocated to other teams, I've lost control
 20 of them.
 21 So my hesitation is that I couldn't be responsible
 22 for the overall control, but I had oversight, I had
 23 monitoring, I could escalate, and those were the things
 24 that I did, and did all the time. But I couldn't
 25 ensure, I wasn't in a position to do that.

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1 Or have I misunderstood your question, sorry?
 2 Q. No, we may come back to that answer and unpack it in due
 3 course, but let's proceed for the time being.
 4 Just looking at the question of competent persons,
 5 under the RRO, did you know that the RRO, particularly
 6 Article 18(1), provided that the responsible person was
 7 to appoint one or more "competent persons" to assist in
 8 the undertaking of preventative and protective measures?
 9 A. Yes.
 10 Q. You did. You were familiar, were you, at all times with
 11 the concept of the competent person? Yes. And were you
 12 the competent person at the TMO?
 13 A. Yes.
 14 Q. Now, can we go to {RBK00055531}. We may not need this,
 15 actually. I'll just show it to you, because we'll come
 16 back to the report in due course.
 17 This is a fire safety management review done by
 18 Matt Hodgson Limited in September 2013. There is
 19 an earlier draft, I think, from the July of that year.
 20 If we go to page 23 {RBK00055531/23},
 21 paragraph 3.2.4, you can see there that he says in the
 22 first paragraph under "Health & Safety 'Competent
 23 Person' role":
 24 "The 'competent (H&S) person' for KCTMO is
 25 Janice Wray ..."

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1 A. Yes.
 2 Q. That corresponded with your understanding?
 3 A. Yes.
 4 Q. Okay.
 5 Did you consider that you had sufficient training,
 6 experience and knowledge to undertake your
 7 responsibilities as the competent person?
 8 A. Well, I had access to a fire safety specialist, and if
 9 I needed access to other specialist advice, then I could
 10 ask for it.
 11 Q. And who was that fire safety specialist?
 12 A. Well, initially it was Salvus and then it was
 13 Carl Stokes.
 14 Q. Right.
 15 A. But I also had regular dialogue with the Fire Brigade,
 16 as you know, we had regular liaison meetings, so there
 17 was quite a lot of dialogue across the sector. There
 18 were various people who I could readily consult.
 19 Q. Let's look at Article 18(3) and see what it provides.
 20 Can we go, please, to {HOM00000040/13}. I'll just
 21 have it up on the screen. "Safety assistance".
 22 Were you familiar with the text of this document?
 23 A. Yes.
 24 Q. And were you familiar with sub-article (3) of
 25 Article 18? Yes?

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1 A. Yes.
 2 Q. If we go over the page, please {HOM00000040/14}, to
 3 sub—article (5):
 4 "A person is to be regarded as competent for the
 5 purposes of this article where he has sufficient
 6 training and experience or knowledge and other qualities
 7 to enable him properly to assist in undertaking the
 8 preventative and protective measures."
 9 I take it from your earlier answer that you had or
 10 you thought you had sufficient training and experience
 11 and knowledge and other qualities; yes?
 12 A. Yes.
 13 Q. Yes.
 14 Now, the competent person has also got to ensure
 15 that the means at their disposal are adequate, having
 16 regard to the size of premises, the risks to which
 17 relevant persons are exposed and the distribution of
 18 those risks.
 19 Can you describe the budget that you had available
 20 for health and safety for the TMO, in general terms?
 21 A. I didn't. I didn't really have a budget, because
 22 anything that I needed to be done, I escalated. It
 23 would go to the technical division. They had the
 24 budgets.
 25 For example, when we instigated the programme of

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1 door replacement, the Manse Masterdor, my role was to
 2 identify the trends and the issues being flagged up by
 3 the fire risk assessment. There was a recurring theme
 4 that we had to assure ourselves that the doors, the flat
 5 entrance doors, were adequately fire rated and
 6 self—closing. I escalated that, it went across to the
 7 technical division, we find a way of finding that
 8 information using stock condition surveyors, and then
 9 the budgetary decisions were all outside of my — they
 10 just weren't my responsibility.
 11 Q. Right.
 12 Well, just focusing on the words, can we go back to
 13 page 13 {HOM00000040/13} and just look at
 14 sub—article (3) again. You can see that it's for the
 15 responsible person —
 16 A. Yeah.
 17 Q. — to ensure that the number of persons appointed as the
 18 competent person — to ensure that the means at their
 19 disposal, that's your disposal, are adequate, having
 20 regard to the size of the premises, the risks to which
 21 relevant persons are exposed and the distribution of
 22 those risks throughout the premises.
 23 Did you monitor or keep under close control or watch
 24 the means at your disposal and the adequacy of those
 25 means, having regard to the size of the TMO's stock for

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1 which you were responsible as a competent person?
 2 (Pause)
 3 A. Yes, I think I did. As I've explained, I didn't have
 4 budgetary control, and I didn't have contractors who
 5 reported to me, so I was reliant — I mean, the
 6 responsible person is obviously the whole — is
 7 an organisational term, so I was having to allocate,
 8 chase, cajole, escalate, do everything within my power
 9 to flag up issues which were being highlighted to people
 10 who had got budgetary control. But I was reading every
 11 assessment that came in and every action plan so I could
 12 identify issues and trends that were coming our way so
 13 that I could start saying, "We don't have a dedicated
 14 budget for this, this is something that looks like it's
 15 going to spiral". So that's my role in this.
 16 Q. Did you ever consider that, in your role as competent
 17 person, you needed better funding or resourcing than you
 18 were getting?
 19 A. Erm ... I don't know. I mean, my issue tended to be
 20 trying to ensure that things were done on time and with
 21 the right degree of quality, and that could be
 22 problematic. I'm not sure that I necessarily thought
 23 that was budgetary. It's difficult to say whether it
 24 was — there was a contractor issue or ... not
 25 especially. There will always be — health and safety

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1 people will always be able to spend money and find
 2 things that they want to do, but no, I don't think
 3 that's necessarily an issue.
 4 Q. Looking at the earlier expressions in sub—article (3),
 5 it says:
 6 "The responsible person must ensure that the number
 7 of persons appointed under paragraph (1), the time
 8 available for them to fulfil their functions [et cetera]
 9 ... are adequate ..."
 10 Did you feel that you had enough time to fulfil your
 11 functions as a competent person?
 12 A. If I'm honest, I was often spread very thinly, because
 13 I had responsibility for the whole of the borough.
 14 There's, what, at least 650 blocks. They're all
 15 requiring assessments, they're all requiring safe
 16 precautions, safe — and there was me and my colleague,
 17 in terms of health and safety. But that's the resource
 18 we had available, so we were pretty adept at
 19 re—prioritising on a regular basis, and fire safety was
 20 always absolutely top of the pile.
 21 Q. Did you ever go to anybody, either in the executive team
 22 or higher, and say, "I am spread very thinly, I can't do
 23 my role as a competent person properly under the
 24 statute, I need help, either in terms of resources or
 25 personal support"?

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1 A. I don't recall doing that, but people knew — my
 2 line managers always knew exactly what I was doing,
 3 exactly the range of activities I was involved with.
 4 It — you know, we had regular one-to-ones, we had
 5 regular catch-ups. We just kept re-prioritising and
 6 trying to make sure that we covered all bases, and we
 7 believed that we did, but we were very busy.
 8 Q. In your own mind, though, did there come a time at any
 9 point where you thought to yourself: "Well, I really do
 10 need a bit more help here"?
 11 A. I think I was aware and I imagine that there are things
 12 that you will raise with me that I didn't document that
 13 I wish I'd had time to document, but I would have always
 14 prioritised putting the procedure in place, putting the
 15 system in place, making sure people were trained,
 16 actually doing what needed to be done, so sometimes my
 17 then recording that didn't happen as swiftly as it
 18 should.
 19 For example, the fire safety strategy. There was
 20 a working draft for a while, but it wasn't completed as
 21 soon as I would have liked it to be, because I was
 22 re-prioritising things which I felt were more important.
 23 Q. Did you have sufficient time and resources as you
 24 believed it at the time to manage fire safety
 25 responsibilities for the whole of the TMO portfolio in

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1 addition to the rest of your health and safety
 2 responsibilities?
 3 A. I'm quite hard working, and I always did — I don't
 4 think there's anything that I missed, so I feel like we
 5 were stretched really thinly, but we made it work. And
 6 in an ideal world and in a different sector, there would
 7 have been more resources, undoubtedly, but we
 8 prioritised it and we made sure that we did what we
 9 needed to do, and we chased those who were not doing
 10 what they needed to be doing as quickly as we wanted
 11 them to, and we escalated to all sorts of committees and
 12 heads of, and we kept everybody appraised of what we
 13 were doing.
 14 Q. Can we go back to your first witness statement, then,
 15 please, to page 39 {TMO00000890/39}, and look at
 16 paragraph 174 together. You say there:
 17 "As Health and Safety Advisors, Adrian and I
 18 monitored the health and safety performance of the TMO
 19 through various means. I gathered relevant information
 20 from sources such as the LFB, reports of fires,
 21 accidents, dangerous occurrences and changes in
 22 legislation and presented this at regular meetings with
 23 the TMO Health and Safety Committee. I also attended
 24 bi-monthly meetings with the London Fire Brigade ('LFB')
 25 and quarterly meetings with the Royal Borough of

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1 Kensington and Chelsea ('RBKC') where information was
 2 shared."
 3 What particular matters did you monitor in respect
 4 of health and safety performance?
 5 A. Well, my colleague, Adrian, was doing, in the early
 6 days, annual health and safety inspections in the
 7 communal areas of all of the estates, which was actually
 8 serving as an audit of the inspections that the
 9 caretakers were undertaking. So he was out practically
 10 ensuring that risks were identified, but also, you know,
 11 if the caretakers needed additional resource or
 12 additional training, or he would sort of be doing
 13 one-to-ones with them to upskill them as part of what he
 14 was doing. So that was ongoing.
 15 We were reporting to the health and safety committee
 16 in terms of all of those fire aspects that you referred
 17 to. We were advising of accidents, dangerous
 18 occurrences. There was a range of factors that we were
 19 reporting to the health and safety committee which had
 20 that kind of remit really.
 21 In addition, what I think is important to say is
 22 that because the compliance, the contract management
 23 team was part of the operations division, and they
 24 appointed contractors and monitored those contractors,
 25 and a lot of the fire safety features were maintained by

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1 that team, or their contractors, I would have regular
 2 meetings with the head of that team where I brought my
 3 agenda, he brought his, and that would be another means
 4 of me trying to identify if there are any sticking
 5 points, if there are any issues I need to be aware of,
 6 if they're re-procuring, what their stats are like,
 7 you know, if we've got problematic contractors.
 8 So there were — sorry, I realise I'm going on, but
 9 those sorts of things.
 10 Q. That's helpful, thank you.
 11 Just breaking that up, first of all, in respect of
 12 what you call caretakers, and we might call estate
 13 service —
 14 A. Assistants.
 15 Q. — assistants, ESAs, what did you do with the
 16 information you got from those individuals?
 17 A. No, sorry, I might have misled you. I didn't get —
 18 well, information that Adrian was given as part of his
 19 inspections on site, he would incorporate into his
 20 reports. If it related to repairs or actions that
 21 needed to be undertaken, there would be a pro forma that
 22 he pretty much completed with a summary of any trends he
 23 wanted to highlight. So those would be put through to
 24 repairs, if they needed responsive items. If it was
 25 training, Adrian and I would endeavour to ensure that

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1 either the HR team or whoever — we tried to proactively
2 get everything in place we could to assist the
3 caretakers, the ESAs, because they had quite a difficult
4 job and we wanted to make sure that we helped them to do
5 it as efficiently as they could.

6 Q. How did you go about ensuring that their work was being
7 completed to the requisite standard?

8 A. Again, they reported to — it may have changed over the
9 years, but they reported to a team leader. There was
10 one in the north, one in the south. Ultimately —
11 initially, they were working off paper records and
12 pro formas, which was difficult, and for a long time we
13 recognised that a PDA would be better. Once they were
14 able to introduce PDAs, then we could run regular
15 reports to see what level of checking they're doing and
16 what is being identified by their checks. Again,
17 I wouldn't have seen those reports unless I requested
18 them, and, just with so much going on, in the first
19 instance that was their line manager's role.

20 As we ultimately looked to develop a better suite of
21 KPIs for health and safety, that was one of the things
22 that we plugged into our KPIs that would be managed by
23 the health and safety committee, and that had started to
24 happen, not as soon as we would have liked, but
25 certainly for a year or two it had been in place.

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1 Q. You refer to reports completed by Adrian Bowman; what
2 did those look like?

3 A. They were usually a cover sheet with a summary, which
4 might have been issues that he particularly wanted to
5 identify in relation to that estate or that block, and
6 then there would be pretty much a table where he'd
7 identified his concern and then who was going to action
8 it.

9 Q. From the start, how did you manage that information?
10 Did you put it onto a system?

11 A. No. I think this is a kind of recurring weakness.
12 Ultimately we had a workflow on our W2 system. Prior to
13 W2, Adrian would have requested the orders that he
14 required from the repairs team or the customer service
15 centre or whatever. There were different procedures in
16 place. But ultimately it went on to W2, and again, that
17 was something that we plugged in to the KPIs, because we
18 could identify the number of issues which we identified
19 and the number that were being closed down.

20 Q. But the W2 wasn't always up and running during your
21 time.

22 A. No, indeed.

23 Q. So before W2, how would you process or collate that
24 information?

25 A. It was really difficult. It had to be done relatively

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1 manually, and in fact, one of the audits, that was one
2 of the things that we were criticised about, is not
3 going back and ensuring that what we had identified was
4 successfully completed. But that was just prior to W2,
5 so actually we already had that on our radar.

6 Q. Now, the other aspect of that long answer you gave
7 earlier relates to specialist contractors.

8 How did you go about ensuring that the fire safety
9 equipment, systems, lifts for example, were being
10 adequately maintained?

11 A. I did rely quite heavily on what was being identified by
12 the fire risk assessment. Those actions were obviously
13 being allocated to the responsible team. But, in
14 addition to that — and then I monitored whether they
15 were being completed and I escalated to the respective
16 team where there were issues outstanding on a regular
17 basis. With W2, they were able to run their own
18 reports, but I still sent them one at least every kind
19 of month or two months to identify what was outstanding
20 and to chivvy them along. That would get escalated to
21 the health and safety committee but — and for a while
22 we had an operations health and safety group that looked
23 specifically at that.

24 But, in addition, I think I possibly also mentioned
25 that I would meet with the head of contract management

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1 on a regular basis to get — to drill down into the
2 detail of why these things weren't being progressed or
3 other issues that I had perhaps been made aware of,
4 sometimes anecdotal comments from caretakers, ESAs,
5 about performance.

6 Q. Looking at paragraph 174 {TMO00000890/39}, in the last
7 sentence there, you refer to quarterly meetings with
8 RBKC; which quarterly meetings were those?

9 A. I was probably referring to — there was what was
10 historically called the main health and safety
11 co-ordinating committee, which I think at one stage met
12 every six weeks. It was a council committee and I was
13 invited to attend that. It became slightly more
14 complicated whenever the council went bi-borough, so
15 then it was a bi-borough health and safety group and it
16 had lots of representatives from Hammersmith and Fulham
17 and from K&C, and actually it became a bit unwieldy,
18 I think, and a bit less helpful. But I also met with
19 Gary Mann, the corporate safety manager, on a regular
20 basis.

21 Q. Whose role was it to ensure that fire safety work
22 carried out by the operations department, health and
23 safety operations, for the time that it existed, met
24 with health and safety and fire safety standards in
25 respect of which you were the adviser or competent

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1 person?

2 A. So I would meet with the head of, who was latterly

3 Alex Bosman. We would look in detail at what I — where

4 I could see there were issues, where there was lack of

5 progress, where perhaps I was being told about

6 contractor performance. He would advise me what action

7 he was taking. He for quite a long time had been

8 developing a dashboard in terms of compliance. The

9 fire safety bit was unfortunately the last bit which he

10 hadn't quite got to, but he had lifts and gas safety and

11 electrical installation checks and I think lightning

12 protection, quite a few of those things went onstream,

13 so we had live information.

14 Every time he re—procured a contract, he engaged

15 a specialist in that specific field, who I think was

16 probably heavily involved in specifying what was

17 required in terms of complying with the legislation.

18 But, in addition, my understanding is, and certainly

19 I know in the case of gas this is the case, that they

20 would look to appoint a specialist in terms of quality

21 control.

22 Q. What was your role in relation to Repairs Direct?

23 A. I didn't have one. They had their own health and safety

24 person.

25 Q. Right. I see.

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1 Did you — I say you; did you or anybody else at the

2 TMO have audit rights over Repairs Direct's health and

3 safety systems?

4 A. I don't know the answer to that, to be honest. I was

5 always entirely separate from Repairs Direct, so

6 I'm afraid I can't help you.

7 Q. You don't know. You don't know who it was who exercised

8 any rights of looking into Repairs Direct's processes

9 and procedures and policies and seeing if they were up

10 to scratch?

11 A. I don't, I'm sorry.

12 MR MILLETT: I would like to turn to a different topic,

13 which is reporting and decision—making for health and

14 safety issues.

15 Mr Chairman, I probably won't get through all this

16 before the break, but I will make a start.

17 SIR MARTIN MOORE—BICK: Yes, all right.

18 MR MILLETT: Can I ask you to stay on that page in your

19 statement {TMO00000890/39} and go to the next paragraph.

20 You say:

21 "The TMO Health and Safety Committee met every

22 two months and was chaired by Barbara Matthews, the

23 Executive Team Member with responsibility for health and

24 safety. Prior to 2015 the meetings were chaired by

25 Anthony Parkes. In order to give that Committee

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1 profile, the Director of Operations, Sacha Jevans, was

2 also a member as were several senior managers and

3 employee Safety Representatives. This Health and Safety

4 Committee reported to the Executive Team."

5 So is it right that, between 2013 and 2015, there

6 were two committees dealing with health and safety

7 matters: there was the TMO health and safety committee

8 and the operational health and safety committee?

9 A. Yes, that's right.

10 Q. Right. What was the difference between the respective

11 remits of each of those committees?

12 A. The — sort of in answer to that, what I would say is

13 the health and safety operations group was set up,

14 I think it's fair to say, directly as a result of us

15 getting a poor audit result, and since most of the risks

16 and all of the resident safety issues sat in operations,

17 I think Sacha's view, and I think rightly so, was that

18 she create an operations health and safety group to look

19 specifically at the risks that her managers were facing

20 and how they were dealing with them. So that did run

21 for a couple of years until Barbara came in, and by that

22 point, actually, there was a lot of duplication, and

23 Barbara's position was that we merge those, and that was

24 sensible, really.

25 Q. It sounds from that, is this right, that there was

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1 actually no difference in remit, in scope of

2 responsibility, but simply that the operational health

3 and safety committee was looking after the operational

4 side of what the health and safety committee generally

5 was interested in?

6 A. Yes. I mean, I think it's fair to say that the health

7 and safety committee would always have had the

8 overarching responsibility, and occasionally that the

9 ops group tended to go off down a tangent into some

10 operational stuff that wasn't exclusively health and

11 safety, so yeah.

12 Q. I see. So, in a nutshell, why were there two committees

13 for that two—year period?

14 A. In truth, I think it was, with good intentions, to drive

15 forward health and safety to ... I think it was — it

16 had good intentions. It was to ensure that the culture

17 of health and safety was spread consistently throughout

18 the organisation and people were taking their

19 responsibilities seriously. It was just I think

20 ultimately we were discussing the same papers, and

21 actually there were a number of people who sat in both

22 committees, so it was probably — it had run its course,

23 I think.

24 Q. Right, I see. And it's right, I think, as a matter of

25 record, that from 31 July 2015, the only committee that

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1 was dealing with health and safety within the TMO was
 2 the health and safety committee of which
 3 Barbara Matthews was the chair?
 4 A. That's right.
 5 Q. Yes.
 6 Now, if we look on in the paragraph we're looking at
 7 {TMO00000890/39}, you say, in order to give that
 8 committee — that's the operations committee — profile,
 9 Sacha Jevans was also a member.
 10 Why was it necessary to raise the profile of the
 11 health and safety committee?
 12 A. Again, I believe that goes back to the audit where we
 13 got limited assurance, and I think one of the things
 14 that Anthony recognised is actually we didn't have
 15 sufficiently senior people on the health and safety
 16 committee. I think we had historically and then there
 17 had been a bit of a — people were sending deputies, and
 18 so it was a bit ... it needed kick-starting, really.
 19 Q. In my question, I referred to operations committee.
 20 A. Sorry.
 21 Q. No, it's my fault. I meant the health and safety
 22 committee.
 23 Specifically, was Sacha Jevans expected to
 24 communicate health and safety issues back down, as it
 25 were, to the operations committee or department?

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1 A. Oh, well, I think all executive directors are supposed
 2 to do that. I think that's what our policy statement
 3 says and that seems a perfectly reasonable position.
 4 Q. What involvement did Sacha Jevans, as director of
 5 operations, have in terms of key fire safety issues and
 6 decisions?
 7 A. She received any stats, any information I was providing,
 8 feedback on liaison meetings, feedback on deficiency
 9 notices, so she had oversight of everything that was
 10 happening in that sphere.
 11 Q. Right. And Barbara Matthews, same?
 12 A. Yes.
 13 Q. But in a more senior and more decision-making capacity?
 14 A. Yes.
 15 Q. Right.
 16 Let's just look and see what Barbara Matthews says
 17 in her first statement to the Inquiry, {TMO10049987/2},
 18 please, paragraph 9. She says there:
 19 "The TMO had a Health and Safety Committee that met
 20 regularly. While I chaired these meetings, I made it
 21 clear to all those in attendance that Janice was the
 22 manager and the expert. My attendance at these meetings
 23 was to highlight the importance that the TMO put on
 24 health and safety. Sacha Jevans also attended as many
 25 matters concerning health and safety fell into her

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1 directorate."
 2 Would you agree with that?
 3 A. Erm ... not completely, because Barbara was actually
 4 very proactive and very hands-on, I think she was ...
 5 and at certain times very engaged operationally. When
 6 we were in dialogue with the Fire Brigade after we
 7 received the Adair enforcement notice and when we asked
 8 for an extension of time, that was written by Barbara
 9 and not by me, so —
 10 Q. Yes, I see.
 11 She says in the second line that she made it clear
 12 to all those in attendance that "Janice was the manager
 13 and the expert". Would you agree with that?
 14 A. Yeah, perhaps.
 15 Q. Now, it's right, isn't it, that between November 2009
 16 and February 2011, you provided a number of reports on
 17 fire risk assessment —
 18 A. Yes.
 19 Q. — and the programme for fire risk assessments generally
 20 for the TMO operations committee?
 21 A. Yes.
 22 Q. Yes, and I'll just read those into the record: they're
 23 {TMO10034738/33}, that's 10 November 2009; there is
 24 {TMO10037422/1}, a further update on fire risk
 25 assessment dated 25 May 2010; {TMO00899852/3}, an update

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1 on fire risk assessments, 25 November 2010;
 2 {TMO00892994/4}, further update on fire risk assessments
 3 dated 22 February 2011.
 4 Then there were similar reports I think prepared for
 5 the TMO board between July 2009 and 2010.
 6 Am I right about what I've just said to you?
 7 A. I'm sure you are. It was fairly prolific because, in
 8 fairness, we had nearly had an enforcement notice from
 9 the Fire Brigade, so it was really important to
 10 scrutinise it, and there was commitment to quite a high
 11 level that they needed to be updated with progress and
 12 they needed to see progress happening, so I'm sure
 13 you're right.
 14 Q. I take it from your evidence that you had a formal
 15 reporting role to the TMO operations committee on health
 16 and safety?
 17 A. For a time I think I presented the reports, but
 18 ultimately, in recent years, it would have been Barbara.
 19 Q. Why were you reporting on fire risk assessments to the
 20 TMO operations committee?
 21 A. Because I'd been asked to.
 22 Q. Right. Who asked you to do that?
 23 A. Robert, presumably.
 24 MR MILLETT: Right.
 25 Let's just look at one of those —

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1 SIR MARTIN MOORE—BICK: Mr Millett, I'm just wondering
 2 whether that would be a good point, before we start
 3 getting into the documents.
 4 MR MILLETT: Yes, absolutely. That's as good a point as
 5 any. Of course.
 6 SIR MARTIN MOORE—BICK: Ms Wray, as Mr Millett said, we're
 7 going to have a break during the morning and the
 8 afternoon, and I think this is the time to have the
 9 morning break.
 10 So we'll stop now. We'll resume, please, at 11.35.
 11 I'll say this every time you leave the room, but please
 12 don't speak to anyone about your evidence or anything to
 13 do with it while you're out of the room.
 14 THE WITNESS: Okay, thank you.
 15 SIR MARTIN MOORE—BICK: All right? Thank you.
 16 Right, would you like to go with the usher, please.
 17 (Pause)
 18 Right, 11.35, please.
 19 (11.20 am)
 20 (A short break)
 21 (11.35 am)
 22 SIR MARTIN MOORE—BICK: Right, Ms Wray, ready to carry on?
 23 THE WITNESS: Yes.
 24 SIR MARTIN MOORE—BICK: Good, thank you very much.
 25 Yes, Mr Millett.

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1 MR MILLETT: Thank you, Mr Chairman.
 2 Ms Wray, I'm going to show you one or two of these
 3 documents.
 4 Can we look, please, at {TMO10037442/62}.
 5 A. Okay.
 6 Q. On that page, we see a report entitled, "Further update
 7 on fire risk assessments", and you can see that it's
 8 dated 30 September 2010.
 9 Is it right that you stopped producing these
 10 specific FRA reports for the TMO board in or after 2010?
 11 We haven't seen any after that.
 12 A. I can't recall. I thought I had — I didn't produce
 13 them at the same frequency, because I wasn't asked to,
 14 really, and there was quite a lot of intensive activity
 15 in the early stages, but ...
 16 Q. Right.
 17 A. I'd be surprised if I hadn't produced more. That seems
 18 like a very long time ago, but I'm sorry, I wouldn't
 19 have the details.
 20 Q. I mentioned a further update of 2011, and there is one
 21 further one in May 2013. I'll show you that,
 22 {TMO10031056}.
 23 This is a report dated 2 May 2013, and it's
 24 entitled, "Current TMO position on fire risk
 25 assessments".

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1 Do you know who asked for that report?
 2 A. Sorry, I don't.
 3 Q. Do you know why it was produced after a gap of some
 4 two years since the previous one?
 5 A. No.
 6 Q. You can see it's addressed to the TMO operations
 7 committee; does that help you?
 8 A. No. I would have produced whatever I was asked to
 9 produce. In the early days after the appointment of
 10 Salvus, that was quite frequent, and so there was update
 11 reports being requested by my manager on a regular
 12 basis. I'm sorry, I can't recall.
 13 Q. Do you know why there were no further reports on fire
 14 risk assessments to the TMO operations committee after
 15 May 2013?
 16 A. No, I don't. I think that would have to be a question
 17 for my manager at the time.
 18 Q. And your manager at the time was Anthony Parkes?
 19 A. That would have been Anthony Parkes at that stage, yes.
 20 Q. Right. Can we take it from that answer that he was the
 21 person that asked you to produce these?
 22 A. Yes, usually.
 23 Q. And you wouldn't have produced them unless he'd done so?
 24 A. No, because the agendas for all of these committees are
 25 set by other individuals, and usually the frequency of

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1 reports is all kind of pre-set and I'm not really party
 2 to that, to be honest.
 3 Q. Right.
 4 A. What I probably should say is the original ones, the
 5 ones back in 2010 and 2011, would have been requested by
 6 my then line manager, who was Lornette Pemberton, it
 7 wouldn't have been Anthony Parkes at that stage.
 8 Q. Yes. We will come to Lornette Pemberton and her role
 9 much later on, I think.
 10 A. Okay.
 11 Q. There was also at this time and throughout, I think,
 12 something called the TMO finance, audit and risk
 13 committee.
 14 A. I believe so.
 15 Q. Right. Do you know what oversight that committee
 16 exercised over health and safety?
 17 A. I don't, I'm sorry.
 18 Q. You don't.
 19 A. Sorry, I was just going to say that because
 20 Anthony Parkes was — he was the director for finance,
 21 I'm wondering if health and safety just fed into that
 22 because of his role and because I reported to him, but
 23 I couldn't say, sorry.
 24 Q. Can I see if I can then draw the threads together
 25 a little bit in relation to the procedure of reporting

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1 and decision—making on health and safety.
 2 You reported to the health and safety committee —
 3 A. Yes.
 4 Q. — and also to the operational health and safety
 5 committee between 2013 and 2015.
 6 A. Yes.
 7 Q. In other words, during its lifetime; yes?
 8 A. Yes.
 9 Q. Yes, and the health and safety committee reported to the
 10 executive team.
 11 A. That's right.
 12 Q. Yes, and that in turn reported to the TMO board.
 13 A. Yes.
 14 Q. Yes. You didn't attend executive team meetings, did
 15 you?
 16 A. Not unless requested to, and that was very unusual.
 17 Q. And did not attend board meetings, TMO board meetings.
 18 A. I've got no recollection of going to board meetings, no.
 19 Q. Barbara Matthews, for her part, would report on health
 20 and safety issues both to the executive team and to the
 21 TMO board; is that right?
 22 A. Yes. Yes, that's right.
 23 Q. Now, if we can just look at her first statement to
 24 the Inquiry, please, {TMO10049987/2}, paragraph 8, she
 25 says there, just below halfway through the paragraph:

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1 "We would also identify [that's you and she] what
 2 health and safety matters we felt needed to be included
 3 in the fortnightly Executive Team meetings and the
 4 annual health and safety report presented to the
 5 Executive Team and the Board. We also caught up weekly
 6 on a more informal basis."
 7 Now, of course, this is after July 2015.
 8 A. Yes.
 9 Q. But can you help us, how would you identify what needed
 10 to be included in the executive team meetings and the
 11 annual health and safety report?
 12 A. I would be reporting to her on which issues were live,
 13 what was ongoing, any trends, any changes in approach
 14 from the Fire Brigade, any imminent legislation, any —
 15 as we'd spoke about, post—Lakanal, there were sometimes
 16 discussion that legislation or best practice would be
 17 changing. A variety of different ways, really.
 18 Q. For the executive team meetings, would you provide input
 19 on health and safety matters?
 20 A. Yes, I recall that — I found some — I'd forgotten
 21 I had done them. When we had team meetings with
 22 Barbara, so she had four people who reported to her, we
 23 would usually take along an update for what our teams
 24 were busy in doing, and I suspect that she used some of
 25 that information to put into her update to the executive

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1 team meetings.
 2 Q. Did you help her draft the agenda or did you draft the
 3 agenda?
 4 A. No, I think she drafted the agenda. She would have had
 5 that information as a reasonably good starting point,
 6 and if she had queries or questions or if I thought of
 7 anything subsequently that needed to be added, I would
 8 have advised her.
 9 Q. Did you draft any reports for the executive team?
 10 A. If I was requested to.
 11 Q. But there was no regular —
 12 A. No, there wasn't a regular, no, no.
 13 Q. Right.
 14 Can I then turn to RBKC's role, and particularly its
 15 monitoring and scrutiny role.
 16 Can we go back to your first statement, please, at
 17 page 37 {TMO00000890/37}, and back to paragraph 164,
 18 which we've I think looked at. But in the second half
 19 of that paragraph, you say this:
 20 "It was always my understanding that the RBKC
 21 retained a monitoring obligation under the MMA, which
 22 was exercised by its Corporate Health and Safety Advisor
 23 and its main Health and Safety Coordinating Committee,
 24 which was succeeded by the Bi—Borough Health and Safety
 25 Committee."

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1 Could you just explain in general terms how that
 2 monitoring obligation worked in practice?
 3 A. In practice, it was quite informal. Gary Mann and
 4 I would meet up regularly, might be quarterly but it
 5 might be less often than that, it was sort of at his
 6 discretion. He would let me know when he wanted to
 7 meet, and I would go armed with what was happening,
 8 where we were at with fire safety, where we were at with
 9 health and safety, any trends, any issues, any serious
 10 incidents or accidents that he needed to be aware of.
 11 We also tried, where possible, where there was new
 12 legislation or guidance, to ensure that there was
 13 a consistent approach between the council and the TMO
 14 about how we would — where possible, where we would
 15 adopt that.
 16 He would sometimes tell me things that were working
 17 well with them, they might have had particular training
 18 packages or whatever that we would want to investigate.
 19 So it was fairly informal, but it covered quite
 20 a range of discussions.
 21 Q. Now, you refer to Gary Mann; he, I think, was the
 22 corporate health and safety adviser —
 23 A. That's right.
 24 Q. — at RBKC; yes?
 25 A. Yes, that's right.

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1 Q. And that was so until he left his post in 2015.
 2 A. Yes.
 3 Q. Do you remember that?
 4 A. I do, and then Somayya Yaqub was his successor, and
 5 I had the same relationship with her.
 6 Q. Yes, and she, I think, took over in January 2016.
 7 A. Yeah, that might be the case.
 8 Q. Yes, and you worked closely with those advisers, did
 9 you?
 10 A. Yes, reasonably.
 11 Q. And you met them, you say, I think — is this right? —
 12 quarterly or maybe less.
 13 A. It might be less than quarterly, but regularly.
 14 Q. When you say less than quarterly, do you mean more
 15 frequently than quarterly?
 16 A. Oh, no, I mean less frequently.
 17 Q. Right, less frequently.
 18 Were those individuals or the role of corporate
 19 health and safety adviser at RBKC, so far as you
 20 understood it, linked in any way to the housing
 21 department?
 22 A. At the time, I don't think I really questioned it.
 23 I sort of assumed that there was a way that they fed
 24 into the housing department, but I didn't question it.
 25 I asked — I answered his questions, I gave him the

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1 information, and I didn't really know if there was
 2 a more formal role in terms of obtaining the
 3 information. I'm not sure, to be honest.
 4 Q. So far as you were aware, which was the RBKC body or
 5 person who exercised scrutiny over your work and your
 6 functions?
 7 A. It would — largely would be the corporate health and
 8 safety adviser and not usually the rest of his team. If
 9 there was an incident or an accident or ... they would
 10 come to me. I would give them as much information as
 11 I could. I would happily report back once I had further
 12 information from the Fire Brigade or the Health and
 13 Safety Executive or whatever. So they would — tended
 14 to be the people that I dealt with in that regard.
 15 Q. Right. But that function sat, I think — is this
 16 right? — as far as you know, in the corporate health
 17 and safety team or group —
 18 A. Yes.
 19 Q. — and not housing?
 20 A. That's right, yes.
 21 Q. Right.
 22 Now, can we look and see what Gary Mann says in his
 23 statement, {RBK00054414/8}, paragraph 36. He says:
 24 "There was no formal process in place which required
 25 the Corporate Health and Safety team to attend at the

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1 TMO offices and check them for health and safety
 2 compliance, or call for their policies and procedures to
 3 be checked for compliance."
 4 Pausing there, do you agree with that statement?
 5 A. I do.
 6 Q. You do.
 7 Can we look at Somayya Yaqub's statement to
 8 the Inquiry. This is {RBK00054456/8}, paragraph 35.
 9 She says there, towards the bottom of your screen:
 10 "Corporate Health and Safety did not routinely
 11 monitor or audit the general safety arrangements for the
 12 TMO. I understood that the TMO was audited by RBKC's
 13 auditing department, who were on occasion assisted by
 14 Deloitte. I do not recall seeing any audit reports in
 15 relation to the TMO or hearing of any significant issues
 16 as a result of the audits."
 17 Was it your understanding that corporate health and
 18 safety did not routinely monitor or audit general safety
 19 arrangements for the TMO?
 20 A. As I said, the relationship was largely — was fairly
 21 informal. They advised me what — I would update them
 22 on what we were doing, what were live issues for us, and
 23 they would often ask for more information, but it wasn't
 24 a rigorous auditing and monitoring exercise, what
 25 they're saying is true.

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1 Q. Right. So you agree with what Ms Yaqub says there?
 2 A. Yes.
 3 Q. Did you ever discuss with Somayya Yaqub the relationship
 4 between RBKC and TMO respectively in respect of health
 5 and safety?
 6 A. No, but I would have assumed that they were given copies
 7 of the audit reports, but that's just obviously wrong on
 8 my part.
 9 Q. Right.
 10 Did Gary Mann or Somayya Yaqub ever comment on or
 11 disagree with you on any issues that you raised with
 12 them?
 13 A. Erm ... I'm sure they commented. I don't recall
 14 disagreeing with them, because I would have been — I'm
 15 sure that would have stood out.
 16 Q. Yes.
 17 I now want to ask you about the health and safety
 18 reports which I think you referred to earlier in your
 19 evidence in passing.
 20 Can we go back to your first witness statement,
 21 please, {TMO00000890/40}, paragraph 180.
 22 You say there, in the middle of your screen:
 23 "I also produced an Annual Health and Safety Report
 24 and Action Plan, which outlined the current strategy for
 25 the TMO, its performance over the last year and its

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1 initiatives for managing and improving safety ... This
 2 Plan was discussed with the Health and Safety Committee,
 3 the Executive Team and the TMO Board before the full
 4 report and an Executive Summary was presented to the
 5 RBKC Corporate Health and Safety Manager. The feedback
 6 we received from the RBKC's Advisor was then used to
 7 help identify any additional priorities for the upcoming
 8 year."

9 What was the reporting period for the report, do you
 10 remember?

11 A. It followed the financial year, so my report would have
 12 been from 1 April to the end of March.

13 Q. I see.

14 A. But it often — it varied depending on how busy we were,
 15 but it would usually be — I would try and get it ready
 16 by about the end of June, early July, which didn't
 17 always sit exactly well with the council's reporting —
 18 annual report. So if they were trying to do theirs
 19 before mine was ready, then I would have to give them
 20 a summary in advance.

21 Q. Right, I was going to ask you about that. But
 22 invariably, the period — and it would have been
 23 invariable — would have been 1 April to 31 March; the
 24 report might take a little time after that?

25 A. Yes.

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1 Q. Do you know why — well, first of all, do you know what
 2 the council's reporting year was? I imagine it would be
 3 calendar year.

4 A. I don't honestly know. I didn't think it was calendar
 5 year.

6 Q. Or financial year?

7 A. I thought it was financial year.

8 Q. So you were only a few days out?

9 A. Yes.

10 Q. Did that cause any difficulties?

11 A. No. When it did — I think I recall one instance where
 12 they were under pressure to get their report produced
 13 and I didn't have all of my statistics, so I wasn't able
 14 to finalise ours, so I was able to give them a draft and
 15 highlight the key themes or the areas where additional
 16 information was required, and they were able to get what
 17 they required from that.

18 Q. Can I assume that you would start to draft your annual
 19 health and safety report and action plan after 31 March
 20 in any year?

21 A. Yes.

22 Q. You wouldn't start work before that?

23 A. Unusual — unlikely.

24 Q. No, quite.

25 Would you have any help in drafting that or did you

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1 do it on your own?

2 A. I had — it was done in consultation with colleagues in
 3 the operations teams particularly, because I needed to
 4 get compliance information from them, for example the
 5 number of smoke alarms installed, the percentage
 6 compliance in terms of electrical installation checks,
 7 et cetera. Sometimes — mostly I had the information
 8 I needed from the Fire Brigade because we'd been getting
 9 that consistently over the year. But, yeah, it was done
 10 in consultation with a number of other colleagues.

11 Q. Certainly in relation to information-gathering, but in
 12 relation to putting pen to paper, did you have any
 13 assistance, or was all the writing yours?

14 A. All the writing was mine, but I would have consulted on
 15 the draft.

16 Q. And is it right that Barbara Matthews, after July 2015,
 17 reviewed that?

18 A. Yes.

19 Q. And before that, Anthony Parkes?

20 A. Yes.

21 Q. Right. And would either of them suggest any comments or
 22 amendments to your draft?

23 A. Barbara would. She was quite actively involved in —

24 Q. Right.

25 A. She may just have reworded things or she might have

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1 asked me to include additional things. I can't recall
 2 the detail, but she definitely would have been quite
 3 involved.

4 Q. But not Anthony Parkes?

5 A. Not so much.

6 Q. Would that document then be presented to the finance,
 7 audit and risk committee as well as the TMO health and
 8 safety committee?

9 A. I believe so.

10 Q. On what occasions was it normally presented to the TMO
 11 board, do you know?

12 A. I don't, I'm sorry.

13 Q. Right.

14 Did you ever receive any feedback or further
 15 questions from either the finance, audit and risk
 16 committee or the TMO board about the contents of your
 17 reports, your health and safety reports?

18 A. I can't recall any. I wouldn't rule it out, but I can't
 19 recall a specific instance, I'm afraid.

20 Q. Did you create an action plan every year?

21 A. I don't think I did every year, but I think that was
 22 probably just lack of time, really.

23 Q. Right, lack of time?

24 A. Well, lack of — yes, lack of time just to draw it up.

25 There was always one in my head that we were kind of

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1 working to, but it always made more sense if it was
 2 documented, and I endeavoured to, but I don't think
 3 I can say that I did one every year.
 4 Q. Right.
 5 I just want to ask you one or two questions about
 6 a specific health and safety action plan. This is for
 7 June 2016, for the year 2016 to 2017, and it is at
 8 {TMO10007728}. We have to, I think, go to the native
 9 document in that.
 10 (Pause)
 11 Yes, that's the one dated 14 June 2016. Can you
 12 see?
 13 A. Yes.
 14 Q. It's paper 11, so clearly it was presented to a meeting.
 15 Am I right in thinking that it would have been the —
 16 well, you tell me, actually.
 17 A. It says, "KCTMO [Health and Safety] Committee —
 18 14th June", paper 11.
 19 Q. So that committee?
 20 A. Yes.
 21 Q. I mean, would it go onwards, upwards, from the health
 22 and safety committee to the main board?
 23 A. Yes — well, it certainly would go to executive team and
 24 they would have made a decision about whether it goes
 25 further.

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1 Q. Looking simply at the first page, item A, "Maintain
 2 fire safety across stock", "Continuing Ongoing Programme
 3 of Fire Risk Assessments", et cetera.
 4 How much input did Barbara Matthews have into that
 5 document? She was in place by then, wasn't she?
 6 A. She was, yeah. Yeah, she would have definitely made
 7 comments.
 8 Q. Right.
 9 Do you know whether RBKC's health and safety adviser
 10 would contribute?
 11 A. I don't think I would have consulted him on this level
 12 of detail.
 13 Q. Right, I see. So can we take it that no advice would be
 14 sought from anybody at RBKC in relation to your action
 15 plans such as this?
 16 A. I don't think so, no.
 17 Q. Right.
 18 Did these reports and action plans inform the RBKC's
 19 housing department contribution to the joint corporate
 20 health and safety committee's annual report?
 21 A. Erm ... sorry, would you mind running that by me again?
 22 Q. Yes.
 23 Do you remember that there was such a thing called
 24 the joint corporate health and safety committee annual
 25 report?

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1 A. That was produced by the corporate safety adviser, yes?
 2 Q. Yes.
 3 A. Yes.
 4 Q. Did these reports go to that person?
 5 A. No, I don't believe so. I think the annual — my annual
 6 report, health and safety report, went to the corporate
 7 safety adviser, and then any subsequent information that
 8 he requested, not probably this level of detail, because
 9 they were producing one report for the whole of the
 10 council, all of the different departments, and I think
 11 it was probably too much detail for them.
 12 Q. Do you know if this report or reports like it were put
 13 before any RBKC committee, such as the housing and
 14 property scrutiny committee?
 15 A. Not to my knowledge.
 16 Q. It's also right, I think, that you wrote reports or
 17 parts of reports for use by RBKC, didn't you?
 18 A. Yes.
 19 Q. For example, the LGA report, "Extinguishing the risk:
 20 A councillor's guide to fire safety"?
 21 A. Erm ...
 22 Q. Let me show you a document.
 23 A. Yes, please, sorry.
 24 Q. {RBK00030060}.
 25 This is a document which was going to go to

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1 a committee, looks like it was going to go to the
 2 housing, environmental health and adult social care
 3 scrutiny committee, 15 March 2010.
 4 A. Okay.
 5 Q. "LGA report 'Extinguishing the risk: A councillor's
 6 guide to fire safety'", and if you go down to the very
 7 bottom, you can see, page 4 {RBK00030060/4}, that
 8 although it's signed Robert Black and Laura Johnson —
 9 A. Yeah, you're right, must have been me.
 10 Q. Yes, because of the contact, so it must have been you.
 11 Is it right that you also drafted the health and
 12 safety sections of the TMO's performance reports for
 13 RBKC?
 14 A. Yes.
 15 Q. You did. And you did that, I think — is this right? —
 16 with Celia Caliskan?
 17 A. Yes, I think they were co-ordinated by my colleague,
 18 Janet Seward, and then Janet would have sent whatever we
 19 thought was our final version to Celia, and if Celia had
 20 concerns, she would come back to me directly.
 21 Q. Yes, thank you.
 22 I want to turn to a different topic now, which is
 23 the start of the FRA programme and Salvus' FRA
 24 management report in 2009.
 25 A. Okay.

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1 Q. Now, can we go, please, to your second witness
 2 statement, {TMO00842341/1}, paragraph 3. You say there:
 3 "Following the introduction of the Regulatory Reform
 4 (Fire Safety) Order 2005, which abandoned the need for
 5 fire certificates in favour of a risk-based approach to
 6 fire safety, the TMO was required as part of its
 7 management function to ensure that FRAs were undertaken
 8 and documented for all communal areas across its stock."
 9 Then you go on at paragraph 4 to say:
 10 "In late 2008/early 2009, the TMO, RBKC and London
 11 Fire Brigade ('LFB') entered into discussions about the
 12 suitability and sufficiency of the TMO's FRA programme.
 13 These discussions resulted in a joint decision to
 14 procure specialist consultants to undertake FRAs across
 15 the stock and adopt a risk-based approach to the FRA
 16 programme."
 17 Now, is it right that before 2009, the TMO did not
 18 engage external consultants to undertake FRAs at all?
 19 A. That is right.
 20 Q. So it was all done in-house, was it?
 21 A. Yes. With the introduction of the RRO, there was
 22 a sort of belief that less complex buildings could be
 23 assessed by internal colleagues with a degree of
 24 training, which seems to have been fairly common across
 25 similar organisations in our sector. I think we got to

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1 the stage where we knew that that wasn't sustainable.
 2 We were having dialogue with the Brigade, who were
 3 saying these aren't suitable and sufficient, and we
 4 weren't challenging that. What we were trying to
 5 clarify for a number of months was what the
 6 Fire Brigade's view of suitable and sufficient looked
 7 like, and we had some very specific issues that we were
 8 trying to get clarity on.
 9 I won't bore you with them — I can if you wish —
 10 but it was to do with secondary means of escape, which
 11 no longer took you to a place of safety, and
 12 building control were saying, "You don't need to do
 13 anything with these, building regs aren't
 14 retrospective", and the Fire Brigade were saying, "Yeah,
 15 you need to sort this out, you need to look at finding
 16 an alternative means to get people" — so, actually, it
 17 was quite a big issue for us in terms of clarifying what
 18 needed to be done and potentially finding a budget, and
 19 because I was getting a conflict, I'd arranged a couple
 20 of site meetings with parties from both organisations,
 21 and there still wasn't clarity, at which point the
 22 Fire Brigade lost patience and said, "You need to sort
 23 this out now or we're going to issue an enforcement
 24 notice".
 25 Q. Just breaking it down a little bit, who was it in-house

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1 at the TMO who was undertaking fire risk assessments
 2 before September 2009?
 3 A. It was mostly my colleague Adrian Bowman.
 4 Q. What qualifications did he have to do that, so to speak?
 5 A. Well, he didn't have the degree of qualifications he
 6 needed, he —
 7 Q. Right.
 8 A. In terms of what we now require. But, at the time, the
 9 Fire Brigade were aware that that's what we were
 10 endeavouring to do, and initially they were —
 11 Q. Right.
 12 A. — unfazed by that approach.
 13 Q. What input did you have from RBKC on the FRA process or
 14 production before September 2009?
 15 A. So the conversations with the Fire Brigade started in
 16 the June, and at that point RBKC were very engaged in
 17 the process of agreeing what we were going to do and
 18 adopting a risk-based — how we were going to do it,
 19 effectively.
 20 Q. No, sorry, my question was: what input did RBKC give in
 21 the process of in-house production of fire risk
 22 assessments?
 23 A. They didn't.
 24 Q. None, right.
 25 Now, you have mentioned the threat of an enforcement

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1 notice —
 2 A. Yes.
 3 Q. — in 2009. That was 17 June, wasn't it?
 4 A. Yes, I believe so.
 5 Q. Yes, and they wanted a competent person to carry out
 6 risk assessments, do you remember that?
 7 A. Yes, they wanted them to be suitable and sufficient,
 8 absolutely.
 9 Q. Let's look at a document. Can we go to
 10 {LFB00031977/23}.
 11 This is an LFB document, and it identifies that on
 12 18 June, at the very top of the box, there was
 13 a discussion between Team Leader Sangster, TL Sangster,
 14 and Alexis Correa, who was health and safety adviser for
 15 Kensington and Chelsea Council:
 16 "... stating that they will be employing a Risk
 17 Assessor and putting money aside to implement all the
 18 works necessary. He asked if they do this will
 19 TL Sangster not issue Enforcement notice. TL Sangster
 20 agreed on the provision that the council/TMO provide us
 21 with a schedule of works."
 22 Were you aware of that discussion at the time?
 23 A. Yes, I believe that I was. Alexis Correa was health and
 24 safety adviser in, I think, what was then the social
 25 services department.

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1 Q. Right. And how come it was RBKC indicating that it
2 would employ a risk assessor and paying for necessary
3 works and not the TMO, do you know?
4 A. I don't know, no.
5 Q. Right.
6 Was the threat of an enforcement action or
7 enforcement notice the principal reason behind the
8 appointment of a consultant and the implementation of
9 a risk-based FRA programme?
10 A. No, I don't think that's really fair comment. We
11 were — we knew there was an issue and we were working
12 with them to clarify what standards they require so that
13 whatever action we took actually demonstrated the
14 approach that the Fire Brigade wanted, and that was
15 quite protracted and a bit frustrating, really, and
16 still hadn't been resolved. So we had already agreed
17 that things would be different, but we were just trying
18 to clarify how different, and then things took another
19 course, really.
20 Q. Right.
21 Now, let's go to the minutes of a meeting about fire
22 risk assessments in early 2009 at {RBK00018535}.
23 This is the minute of a meeting on 6 August 2009, as
24 you can see, between RBKC, TMO and the LFB.
25 Now, you're not identified as having been in

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1 attendance.
2 A. That's right.
3 Q. Keith Holloway was there for TMO properties, and also,
4 from RBKC, you can see there was Jean Daintith and
5 Laura Johnson.
6 A. Yeah.
7 Q. What was Keith Holloway's role?
8 A. I think he was an interim director. I can't recall what
9 his remit — he might have been an interim housing
10 management director, I'm not quite sure.
11 Q. Do you know why you weren't at the meeting?
12 A. I wasn't invited. Other than that, I don't know —
13 Q. Do you know why you weren't invited?
14 A. No, I don't, sorry.
15 Q. Was the detail of the discussion at this meeting
16 reported to you?
17 A. Yes, it was.
18 Q. Did you see a copy of this meeting minute afterwards?
19 A. I think I did, yes.
20 Q. Who reported the detail of the discussion to you?
21 A. I'm presuming it must have been Keith Holloway.
22 Q. Can we go to page 2 {RBK00018535/2}, please, item 5, you
23 can see "Fire Risk Assessment(s)" is the title there,
24 and it says:
25 "Angus Sangster ... stated that the TMO risk

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1 assessments so far had not been up to a satisfactory
2 standard. He explained that through conversations with
3 the officers currently carrying out the Fire Risk
4 Assessments he felt they did not have the level of
5 understanding required.
6 "Keith Holloway ... explained that the fire risk
7 assessments would be carried out by the consultant and
8 that surveys had gone out to tender.
9 "Angus Sangster (LFB) suggested the TMO show the LFB
10 a copy of the proforma before risk assessments are
11 carried out.
12 "Keith Holloway (TMO) suggested it might be
13 beneficial for LFB to meet with the chosen contractor
14 before any risk assessments were completed.
15 "Angus Sangster (LFB) confirmed he would be happy to
16 do this."
17 Now, looking at the first part of that, where
18 Mr Sangster is recorded as having said that the TMO risk
19 assessments were not up to a satisfactory standard, did
20 you think that that was a fair observation?
21 A. I think we'd been quite clear from our protracted
22 discussions with the LFB prior to this that they were
23 not happy with the assessments and believed them not to
24 be up to satisfactory standard, and therefore it was
25 agreed that we were going to act upon that and act

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1 promptly. The difficulty had been clarifying the
2 standards that the Brigade required in relation to a few
3 specific but really quite important areas. That's what
4 had caused the delay. So it's a little bit frustrating,
5 but anyway.
6 Q. Right.
7 A. Okay.
8 Q. But, in fact, this problem had been ongoing, I think,
9 since 2008, and culminated in this episode.
10 A. Yes, because we'd had on-site meetings with
11 building control and the Fire Brigade and there still
12 wasn't a consensus about what standard I'm supposed to
13 follow and which way forward.
14 Q. If you go to the very bottom of the screen and count up
15 seven lines, you can see that Angus Sangster is recorded
16 as asking:
17 "... whether the Council and TMO felt that 3 years
18 would be acceptable to carry out risk assessments of all
19 the properties they are responsible for ..."
20 Do you see that?
21 A. Yes.
22 Q. Then:
23 "Both Jean Daintith and Keith Holloway ... agreed.
24 "Angus Sangster ... asked whether the Council and
25 TMO felt that 5 years would be acceptable to carry out

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1 all the significant findings identified by the risk
 2 assessments for all the properties they are responsible
 3 for.
 4 "Both Jean Daintith and Keith Holloway ... agreed."
 5 Were you aware of that discussion and agreement?
 6 A. Yes, I was.
 7 Q. You were.
 8 Then if we go to page 4 {RBK00018535/4}, item 10,
 9 you can see there it says, in the second full paragraph
 10 up, just above item 11:
 11 "Angus Sangster (LFB) replied that he feels TMO need
 12 to develop the level of competence amongst their staff.
 13 "He also suggested a member of staff from the
 14 council/TMO could be seconded into the LFB in order to
 15 gain experience of fire safety procedures."
 16 Were you aware of that discussion? Presumably you
 17 were if you saw this minute.
 18 A. Yes, but it never amounted to anything.
 19 Q. Well, I was going to ask you: was anything done ever to
 20 pursue that suggestion?
 21 A. The offer was never made formally, other than the
 22 suggestion here, and —
 23 Q. No, but did anybody at the TMO ever actively seek to
 24 take the LFB up on it?
 25 A. Not to my knowledge. I don't know — I can't speak for

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1 Keith Holloway, but not to my knowledge.
 2 Q. Right. Was anything else done to develop the level of
 3 competence among the TMO staff?
 4 A. Well, yes, but also there was quite a lot done to
 5 develop our relationship with the Fire Brigade so that
 6 we wouldn't have areas where the standards were unclear.
 7 We —
 8 Q. That's not quite my question.
 9 A. No.
 10 Q. I'm just pressing you a little bit.
 11 A. Okay.
 12 Q. You can see that the LFB tells TMO that it needs to
 13 develop the level of competence among its staff.
 14 A. Yes.
 15 Q. Was anything done to develop the level of competence
 16 among TMO's staff?
 17 A. Adrian and I would have had additional training,
 18 definitely, and I can't speak for ... I'm ... I would be
 19 speculating. I'm sure there was, but I can't remember
 20 the detail.
 21 Q. What was the additional training you received in
 22 response to this —
 23 A. We would have sought out fire related, RRO, fire risk
 24 assessment type courses, in terms of being the housing
 25 manager, the landlord, because that's what our

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1 responsibilities were going to be now we were going to
 2 have a competent contractor to do the assessments.
 3 Q. From whom did you seek those fire related, RRO, risk
 4 assessment courses?
 5 A. I can't remember as I'm sat here now, but I would have
 6 always checked with my institution, I would have
 7 checked — I may have asked for a steer from the
 8 Fire Brigade about what they would recommend, I may have
 9 asked Salvus, I don't know, I would — there's a range
 10 of responsibilities, but I can't recall the detail, I'm
 11 sorry.
 12 Q. Did that training, whatever it was, educate you as to
 13 how to go about instructing a fire risk assessor, and
 14 making sure you knew what to expect from a competent
 15 fire risk assessor?
 16 A. Yes, I believe so.
 17 Q. Right.
 18 Did that training educate you at that stage — and
 19 don't forget, this is early on, this is 2009 — as to
 20 the content of PAS 79, 2007 edition?
 21 A. Yes. I would never have been an expert on PAS 79 and
 22 I didn't think that I needed to be, but I would have had
 23 an awareness of it, I would have known where to consult
 24 it, I would have had an overview of it, yes.
 25 Q. Can we then move on in the story, January 2010,

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1 {LFB00031977/30}, please.
 2 This is a letter dated 27 January 2010, and it's
 3 from, as you can see, Jean Daintith and Laura Johnson on
 4 page 1, and it's addressed to Mr Sangster, "Compliance
 5 with the [RRO]".
 6 If you go to page 32 {LFB00031977/32}, you can see
 7 that it's signed by Robert Black and Laura Johnson
 8 respectively.
 9 A. Yes.
 10 Q. If you go back, please, to page 1 {LFB00031977/30},
 11 looking at the first paragraph, it says:
 12 "Further to our recent meeting at your offices with
 13 Pam Sedgwick, RBKC's Housing Client Side Manager and
 14 Janice Wray, the TMO's Health & Safety Advisor, we write
 15 to confirm our commitment to complying with this
 16 legislation and to set out our approach to achieving
 17 compliance."
 18 Were you aware of this letter when it was sent, do
 19 you think?
 20 A. I think it quite likely I drafted it.
 21 Q. Ah, I was going to ask you that. You think you drafted
 22 it. Is that because under the date it says, "Please ask
 23 for: Janice Wray"?
 24 A. Yes.
 25 Q. Yes. And did this agree the action points set out in

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1 the letter?

2 A. "Adopt a risk-based approach ..."

3 Q. Yes, if you look at the bottom of page 30 and over to

4 page 31.

5 A. Yes. I believe this was just confirming the discussions

6 that had been had with the Brigade, that these were the

7 points that they'd set out and this is what we'd

8 progressed.

9 Q. So this is a record of what was agreed at the meeting

10 you were at?

11 A. Yes, I believe so.

12 Q. Yes, thank you.

13 Now, if we go to the very bottom of page 1 and look

14 at the third bullet point there, it says:

15 "Appoint a competent Fire Safety Consultancy partner

16 to undertake the fire risk assessments in each of the

17 110 potentially high-risk blocks."

18 Did the phrase "fire consultancy partner" mean

19 anything specific to you in relation to the level of

20 qualification of the fire consultant that was agreed

21 with the LFB?

22 A. "Fire safety consultancy partner" wouldn't be a term

23 that I would have used generally, but in the procurement

24 process, my procurement colleagues were advising that

25 this is how we define people.

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1 In terms of competency, we set that out in the

2 tender, what we would expect competency to look like.

3 Q. Was there any discussion at this stage about competence,

4 about what competence was in this context?

5 A. In this context ... sorry, can I see down to the bottom

6 of the page?

7 Q. Yes, of course, if you turn to page 31 {LFB00031977/31},

8 which is page 2 of the letter.

9 (Pause)

10 A. I doubt it, because the consultant had been appointed,

11 we had -- all the things that we'd said, we'd shared the

12 pro forma, we'd done joint site visits, we'd asked

13 the Brigade to attend progress meetings, so they'd been

14 fairly heavily involved, so I don't recall there

15 being -- and they were happy. I don't recall there

16 being specific discussions about competence at that

17 stage.

18 Q. No.

19 Just panning out from the detail of this document,

20 this is January 2010.

21 A. Yes.

22 Q. Now, you will remember that in the September of 2009,

23 Salvus had been appointed to do FRAs for the TMO's

24 stock. Do you know why what we see in this letter is

25 being discussed at this point, January 2010, when in the

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1 summer of the previous year, the TMO had already run

2 a selection process for fire risk assessors and had

3 appointed Salvus?

4 A. I don't know, actually. I'm assuming it was a bit of

5 a belt and braces -- perhaps it was -- the four-monthly

6 progress meeting, perhaps it was to coincide with that,

7 just to confirm that these were the original

8 discussions, this is what we said that we would do,

9 we're just confirming that that's what we've done,

10 because the engagement with the Fire Brigade had been

11 ongoing constantly throughout, so they were aware of

12 this. I'm assuming somebody wanted a formal record,

13 like an audit trail of what we'd done.

14 Q. I see. It may be that there is a clue to this in the

15 fourth bullet point at the bottom of page 30

16 {LFB00031977/30}:

17 "Seek a commencement date of September 2009 for the

18 programme of FRAs at the high-risk blocks and completion

19 within 6 months."

20 A. Yeah.

21 Q. I mean, this is now almost at the end of that six-month

22 period, so was this essentially backward-looking, at

23 least this part of the letter?

24 A. I'm assuming so. I assumed it was to sort of confirm

25 that we had put in place what we had agreed with the

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1 Fire Brigade would be put in place.

2 Q. Right.

3 If we go back to page 2 of this letter

4 {LFB00031977/31}, the first bullet point at the top of

5 the page, you can see it says this:

6 "Evaluate the performance of the Fire Consultant

7 and, resource-permitting, adopt the same approach to

8 completing the FRAs of the medium and also the low-risk

9 properties. Aim to undertake the programme of

10 medium-risk FRAs at the conclusion of the high-risk

11 programme. Aim to commence the low-risk programme

12 immediately on completion of the medium-risk project."

13 Now, at this stage, January 2010, the high-risk

14 project wasn't quite completed and -- is this right? --

15 the medium and low-risk hadn't even been put out to

16 tender yet.

17 A. That's right.

18 Q. So this part is forward-looking.

19 A. Yes.

20 Q. Can you help us with what was discussed in terms of

21 evaluating the performance of the fire consultant there?

22 A. At this meeting? I doubt much was discussed. I think

23 the Fire Brigade were happy with the progress we were

24 making, they wanted to be assured that it was going to

25 be sustained and ongoing, and so that's what we said our

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1 intention was, to meet the three-year deadline that they
 2 had set out. But I doubt the detail — as you say, we
 3 hadn't yet completed the high-risk.
 4 Q. Were there any criteria or objective standards
 5 formulated or identified at the meeting to allow you to
 6 evaluate the performance of the fire consultants, so to
 7 speak?
 8 A. Not that I recall.
 9 Q. Would you agree that it appears that there was
 10 an agreement for this to be done not only for the
 11 high-risk properties, but also the medium and low-risk
 12 properties, if resources permitted?
 13 A. I ... Yeah, I think the "resource permitting" was about:
 14 do we adopt the same approach? But I can't really
 15 confirm. But yes, you're right.
 16 Q. Right. And was the agreement that RBKC would also
 17 evaluate the performance of the fire consultant or was
 18 this just the TMO doing that?
 19 A. No, no, it was very much a joint initiative.
 20 Q. What system, then, was established for RBKC to evaluate
 21 the performance of the fire risk assessor?
 22 A. Well, they were attending all of the progress meetings,
 23 so they could see where we were at in terms of progress
 24 being made against the programme. They could see the
 25 issues which were arising, how they were being

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1 addressed, and they could see the interaction with the
 2 Fire Brigade and the Fire Brigade's requirements. So
 3 they were sort of party to the head overview of the
 4 process.
 5 Q. Who at RBKC would do that? I mentioned Ann Muchmore
 6 earlier on.
 7 A. I think it was still Ann Muchmore. At a later time, she
 8 was replaced by Roger Keane, I believe, but at this
 9 stage I think it was still Ann Muchmore.
 10 Q. You have covered this, I think, but just answer me
 11 again, if you would: what would RBKC's evaluation
 12 involve?
 13 A. Erm ... right. I think — I mean, they've got really
 14 the same to go on as I have. I can't recall exactly how
 15 we did it. It's quite likely that we had a meeting with
 16 Janet Rhymes, our professional services officer, who is
 17 from the procurement team, and kind of sat down and
 18 worked out if we had got what we expected delivered from
 19 Salvus. You know, clearly we were getting the FRAs, we
 20 were largely getting them on time. The plans were
 21 coming a bit late, but that wasn't a deal-breaker.
 22 We'd made quite a lot of progress in terms of —
 23 there were quite a lot of repeat issues coming up,
 24 sometimes because they hadn't asked for documentation,
 25 so there was definitely a feeling that we were getting

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1 a lot of actions that perhaps with a bit more
 2 preparation, and on our part as well as the consultant,
 3 that actually would have meant less actions coming out
 4 of the assessment.
 5 So I think we learned a great deal. I think we were
 6 perhaps slightly naive going into it about the scale of
 7 what we might be asked to provide.
 8 Sorry, I'm not sure I'm answering your question,
 9 apologies.
 10 Q. Can I then turn to the instruction of Salvus
 11 specifically.
 12 Go to your second witness statement,
 13 {TMO00842341/2}, paragraph 9. You say there that:
 14 "Salvus was instructed by the TMO to carry out FRAs
 15 at 110 properties within the RBKC's housing stock
 16 identified in this list as potentially high risk ..."
 17 Then you exhibit at JW/3 a list. That, for note
 18 purposes only, is at {TMO00842374}. We don't need to go
 19 to that.
 20 Am I right in saying that the high-risk list
 21 included Grenfell Tower?
 22 A. Yes, you're right.
 23 Q. It did. And Salvus were instructed at the start of
 24 September 2009, I think, weren't they?
 25 A. Yes, they were.

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1 Q. In fact, the contract was signed on 2 September by the
 2 TMO and on 7 September by Andrew Furness for Salvus.
 3 Now, in the light of that, can I then ask you about
 4 a document produced by Salvus on 22 September 2009, only
 5 three weeks or so after they were appointed, and this is
 6 at {SAL00000013}.
 7 It's entitled "Fire Risk Assessment for Fire Safety
 8 Policy and Procedures conducted on behalf of the [TMO]",
 9 I summarise, "by Salvus".
 10 You can see on page 5 {SAL00000013/5}, if we just go
 11 to page 5, the date, top right-hand corner,
 12 22 September 2009.
 13 A. Yeah.
 14 Q. I'll call this, for shorthand, the Salvus management
 15 report, if I may.
 16 Can I go to the first two paragraphs of the
 17 introduction on page 2 {SAL00000013/2}. It says there:
 18 "This Fire Risk Assessment Management report has
 19 been completed at the request of Russell Thompson Head
 20 of Asset Strategy and Investment of Tenant Management
 21 Organisation (TMO) of the Royal Borough of Kensington
 22 and Chelsea.
 23 "This Management Report reflects information
 24 gathered on the fire safety management systems of the
 25 TMO in respect of its property portfolio as per contract

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1 Agreement dated 2nd September 2009."
 2 Do you see that?
 3 A. Yes.
 4 Q. It looks as if it was the TMO that instructed Salvus,
 5 not RBKC; is that right?
 6 A. Yes, that's right.
 7 Q. Do you know who within the TMO received a copy of this
 8 report?
 9 A. I certainly did, and I imagine Russell did, and I would
 10 imagine everyone who Salvus regularly dealt with, so I'm
 11 imagining it would be Janet Rhymes and Ann Muchmore.
 12 Q. Was it shared in an email exchange or at a meeting, do
 13 you remember?
 14 A. I think it came in by email.
 15 Q. Right.
 16 Now, I'd like to show you some of the topics that
 17 were highlighted by Salvus in it.
 18 If we go to page 5 again {SAL00000013/5}, please,
 19 and look at paragraph 1.1, you can see the "Hazard"
 20 column there, and under 1.1, it says:
 21 "Lack of a TMO fire safety policy statement."
 22 Then if you look across to the fourth column, in
 23 italics it says:
 24 "There does not appear to be an overall TMO
 25 fire safety policy statement, setting out the

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1 organisations strategic fire safety objectives,
 2 including reference to achieving full compliance with
 3 the requirements of the Regulatory Reform (Fire Safety)
 4 Order 2005 wherever it applies by premises managed
 5 and/or occupied by the TMO; and which is formally
 6 endorsed by the Chief Executive on behalf of the TMO."
 7 Do you see that?
 8 A. Yes.
 9 Q. Then look, if you can, at 1.2 and 1.3 on page 5, and 1.4
 10 on page 6. Just read those briefly to yourself. At
 11 1.2:
 12 "Lack or inadequate TMO policy and arrangements."
 13 And you can see what's said in the italics under the
 14 "Existing control measures" there. Do you see that?
 15 A. Yes.
 16 Q. Then 1.3:
 17 "Lack of/inadequate recording systems eg log book
 18 and/or fire safety manual."
 19 And you can see what's said in italics there under
 20 the "Existing control measures" column.
 21 Then if you turn the page to page 6 {SAL00000013/6},
 22 top of the page, 1.4:
 23 "Lack of/ineffective managerial audit of fire safety
 24 arrangements."
 25 Again, you can see what's said in italics there.

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1 A. Yes.
 2 Q. Do you see that?
 3 A. Mm—hm.
 4 Q. I've shown you, albeit a bit briefly, perhaps, the
 5 hazards and the identified existing control measures and
 6 those which are not adequately controlled.
 7 Did you agree with Salvus' conclusions in the
 8 italics?
 9 A. Some I did and some I didn't. How — we didn't have
 10 a written fire safety policy statement at that stage.
 11 That's correct. I looked at this report recently and
 12 there are a number of things on here that probably
 13 shouldn't have been on here. However, some of it, yeah,
 14 was absolutely valid.
 15 Q. Of the four I've shown you already, 1.1, 2, 3 and 4 —
 16 A. Yes.
 17 Q. — did you disagree with any of those?
 18 A. I think with regard to the one about the premises log,
 19 that was just not going to work for us. It would not —
 20 we wouldn't have been able to ensure that contractors
 21 were going to complete that every time they attended the
 22 premises, and so I think we —
 23 Q. That's 1.3?
 24 A. Yes, I believe so. Sorry, it's not on my screen.
 25 Q. Foot of page 5 {SAL00000013/5}, let's just have it up,

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1 please, 1.3. You say that was impracticable?
 2 A. Yes. When I researched it with colleagues,
 3 neighbourhood and housing management colleagues
 4 particularly, it was felt that that wasn't going to
 5 work.
 6 Some specific pieces of kit, for example lifts, are
 7 very good at having a log sheet on site with some
 8 information. But having one document that's
 9 co-ordinated in one location and getting all of the
 10 planned preventative maintenance contractors to complete
 11 it every time they come to the property, it just hasn't
 12 been possible for us, and then to police it, to go to
 13 the site to make sure that it's being completed, is
 14 a challenge as well.
 15 Q. But just to be very clear, apart from the
 16 impracticability of 1.3 —
 17 A. Yes.
 18 Q. — you agree, I think, do you, with the conclusions in
 19 italics relating to 1.1, 1.2 and 1.4?
 20 A. I agree that we hadn't documented our arrangements in
 21 terms of fire safety at that stage.
 22 Q. Now, let's just look at that a bit more closely.
 23 Could we please go to {TMO00869720/495}.
 24 This is a document called "Health and safety
 25 policy", "Statement of intent".

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1 A. Yeah.
 2 Q. If you go to the bottom of the screen, if you scroll
 3 down to the foot of page 495, you will see it's signed
 4 by Gordon Perry, dated July 2003.
 5 A. Yeah.
 6 Q. That policy, as I say, appears to be dated July 2003.
 7 Was that the only policy that was in force at the
 8 time of Salvus' review in September 2009?
 9 A. I'm sorry, I can't recall.
 10 Q. It's not a fire safety policy, is it?
 11 A. No, no, it's a health and safety policy statement, but
 12 I'd be surprised if there hadn't been one in the
 13 intervening years, but I don't recall.
 14 Q. I take that point and I was going to ask you, it doesn't
 15 appear to have been updated since the introduction of
 16 the Fire Safety Order, or the RRO, rather, in 2005. We
 17 haven't seen a document which did that. Do you know why
 18 that is?
 19 A. I don't know why that is and I'm really surprised if
 20 that's the case.
 21 Q. Did you provide this document to Salvus before they
 22 completed their report, do you know?
 23 A. Sorry, I don't know.
 24 Q. No. Is this the first time you've seen this document,
 25 do you think?

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1 A. For a very, very long time, yes.
 2 Q. Right.
 3 Going back, if we can, then, to the Salvus FRA
 4 management report, please, {SAL00000013/19}.
 5 This is the first page of the action plan, as you
 6 can see —
 7 A. Yeah.
 8 Q. — at the top. You can see the key. There is
 9 colour—coding on the right—hand side. Do you see that?
 10 A. Yes.
 11 Q. On the right—hand side:
 12 "Key to colour coding
 13 "Red — Statutory Breach.
 14 "Amber — Best Practice/guidance.
 15 "Green — Consultant recommendation (additional life
 16 risk protection)."
 17 Do you see that?
 18 A. Yes.
 19 Q. If you then go to the action plan itself on page 13
 20 {SAL00000013/13}, we start with 1.1, and they go up
 21 through the pages from page 13 to page 19.
 22 I've counted 19 areas where the TMO was considered
 23 to be in statutory breach, in other words had a red mark
 24 next to the item.
 25 A. Mm—hm.

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1 Q. That's my counting. Would that be right? It's
 2 a question just of counting, but would that surprise
 3 you, 19?
 4 A. If you've counted them, then that must be the case.
 5 Q. Okay.
 6 If we look at the second column, "Priority Rating",
 7 the majority of the items which are flagged red, if you
 8 just scroll down the pages, are priority rated 3 or 4.
 9 Take that from me that most of them are.
 10 A rating of 3 means that the action needed to be
 11 taken within one month. That's right, isn't it?
 12 A. Yeah.
 13 Q. If we go to page 19 {SAL00000013/19}, perhaps we will
 14 see that more clearly:
 15 "Key to priority rating ...
 16 "3 Undertake action within 1 month.
 17 "4 Action within 3 months or agree plan within
 18 6 months."
 19 So you were aware of that, presumably, when you saw
 20 their work and you saw how it worked; yes?
 21 A. Yes.
 22 Q. If we go back, then, to page 13 {SAL00000013/13} and
 23 look at a specific action, action 1.2, it says there —
 24 and again, this is mostly marked red — you see:
 25 "It is strongly advised that adequate policy and

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1 supporting arrangements are introduced to explain how
 2 TMO will meet the objectives set out in the strategic
 3 policy statement, so as to ensure suitable and
 4 sufficient fire safety is maintained at all times
 5 throughout the managed estate (property portfolio)."
 6 That, as you can see, had a priority rating of 4.
 7 It was a red item with a priority rating of 4. That
 8 means that it should have been actioned within
 9 three months or a plan agreed for it within six months;
 10 yes?
 11 A. Mm—hm.
 12 Q. Was that your understanding at the time of that specific
 13 item? Yes.
 14 If you go to page 18 {SAL00000013/18}, item 9.3, you
 15 can see there:
 16 "It is strongly recommended that TMO consider
 17 development of formal procedures to deal effectively
 18 with fire safety issues associated with disabled or
 19 vulnerable tenants and leaseholders, and also any
 20 employees.
 21 "This should include a range of options from
 22 relocation in severe cases with or without potential
 23 property adaptations and fixed fire suppression systems
 24 to the provision of specific personal emergency
 25 evacuation plans in those less serious cases.

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1 "See also recommendations in HM Government guidance
2 and Building Regulations Approved Document M."

3 So you can see from that that there was also a red 4
4 in relation to disabled and vulnerable tenants and
5 leaseholders, and employees; yes?

6 A. Yes.

7 Q. How did you plan to address that deficiency at that
8 stage, do you remember?

9 A. At that stage, I think my housing management colleagues
10 were starting to gather more information about
11 vulnerability. I know over the years the method by
12 which they did that fluctuated. My plan was to work
13 with the housing managers, who knew their residents, and
14 get them to identify anyone they had concerns would not
15 have the ability to be alerted to a fire or to respond
16 to a fire. And that wouldn't always result in a PEEP,
17 because it — in some cases it would have been about
18 their sensory deprivation, which could have been and in
19 some cases was rectified by changing how the automatic
20 detection in the dwelling worked so that they could be
21 alerted.

22 In some cases we certainly had some — quite a lot
23 of involvement with people who had been identified as
24 potentially hoarding. In those cases what we did was —
25 some cases they needed cooker — in extreme cases,

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1 sometimes they needed cookers to be cut off. There was
2 a range of things that we had in place.

3 We would ultimately, and we did in a small number of
4 cases, produce a PEEP, but the reality is, we would —
5 it would have been unlikely we would have any staff who
6 could assist, because — so we would have been quite
7 constrained by whatever PEEP was drafted. If the person
8 who was vulnerable had family who could assist, that
9 would be great. If they could, if there was a fire
10 within the dwelling, and they had the wherewithal to
11 leave the flat and close the door, then potentially, at
12 least initially, they're in another compartment, call
13 the Brigade and hopefully the Fire Brigade would be able
14 to assist. But it was going to be a challenge.

15 Q. Let me be a little bit more general.

16 You were given a list of red deficiencies, some 19
17 in all.

18 A. Yes.

19 Q. I picked on PEEPs specifically because we'll come back
20 to it very specifically later on and what you've just
21 told us.

22 A. Yes.

23 Q. But in general terms, how did you plan to address the
24 deficiencies highlighted in the report?

25 A. Okay. There were a number that were relatively

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1 straightforward to deal with. There were issues which
2 we did fairly promptly about amending the ESAs'
3 checklist so that we ensured that they were checking all
4 of the additional fire safety issues, the final exit
5 door, the signage, the emergency lighting, et cetera,
6 and we did the same for the community officers who
7 worked in the specialised housing schemes. They were
8 done pretty swiftly.

9 As you know, we'd identified a need for flat
10 entrance doors to be investigated further. That was put
11 in train and ultimately led to a substantial number of
12 replacement doors.

13 There were issues raised about staff training, but
14 the consultants hadn't asked for the staff training
15 records, so we revisited that, but that was in place.

16 There were issues raised about workplaces — there
17 were quite a lot of things which, to give you
18 an example, I believe there is one in here about
19 leaseholders' gas appliances and that the TMO should
20 make sure that those were serviced. Under the terms of
21 the lease, those aren't our obligation, but for many
22 years we had written to every leaseholder annually
23 pointing out the value of having their own appliances
24 inspected and serviced, and also advising them if they
25 sublet their property and took on the responsibility of

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1 a landlord, that, actually, under the terms of the Gas
2 Safety (Installation and Use) Regulations, they were
3 required to service these for their tenant.

4 So there were some things which were already here
5 and actually aren't reflected, and there were quite
6 a few other things that we were able to resolve quite
7 swiftly.

8 I completely take on board that it took far too long
9 for us to put in writing our policy statement, fire
10 safety strategy, but it was a work in train for
11 a substantial period.

12 Q. We're going to come to that.

13 A. Yeah, okay.

14 Q. We're going to come to that in due course.

15 Now, can we go to {RBK00053571}. This is a report
16 for the TMO board dated 8 October 2009.

17 A. Okay.

18 Q. If you go to page 3 {RBK00053571/3}, we can see that
19 your name is on it.

20 A. Yes.

21 Q. Which is why I'm putting it to you that you prepared
22 that document —

23 A. That's right.

24 Q. — that's right, isn't it?

25 A. Yeah, that's likely.

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1 Q. You can see that at page 2 {RBK00053571/2},
 2 paragraph 3.4, it says:
 3 "A further meeting was held with Salvus on the 24th
 4 September to enable them to have sight of our fire
 5 safety policies, procedures, planned maintenance
 6 contract etc. The feedback from this meeting is that
 7 generally the TMO have good fire safety policies and
 8 procedures in place, however, these have not been
 9 consistently documented. Therefore, the TMO must review
 10 and update our Fire Safety Policy and Procedures to more
 11 accurately and comprehensively reflect our good
 12 practice. The TMO Health & Safety Team has now started
 13 work on this review."
 14 Was the meeting on 24 September 2009 itself minuted,
 15 do you know?
 16 A. Sorry, I wouldn't know. Normally they were, so if not
 17 I'd be surprised.
 18 Q. What fire safety policies and procedures did you show
 19 Salvus at that meeting, do you know?
 20 A. I don't know.
 21 Q. Did you show them the 2003 policy with Gordon Perry's
 22 name at the bottom?
 23 A. I'm sorry, I don't know.
 24 Q. You don't know.
 25 Do you know why your report to the board here

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1 doesn't comment on many of the urgent and critical
 2 concerns raised by Salvus in their 22 September 2009 FRA
 3 management report?
 4 A. I think because of timing, the board — if the board was
 5 on 8 October, the meeting agenda goes out whatever
 6 number of days in advance, the report has to be ready.
 7 But, actually, I don't think I received the Salvus
 8 report until November, because I re-read a progress
 9 meeting in November and it said — it seemed to confirm
 10 that I'd only just received it. I think, although it's
 11 dated 22 September, I don't believe I got it until
 12 several weeks later.
 13 Q. Right. So you think that the 24 September meeting
 14 happened before you'd seen the 22 September report; is
 15 that right?
 16 A. Yes.
 17 Q. Right.
 18 A. I'm sure that is the case, yes.
 19 Q. Right.
 20 At the 24 September meeting, do you remember whether
 21 Salvus went through their 22 September report, at least
 22 in outline?
 23 A. I don't believe that they did. I re-read the minutes of
 24 the progress meetings and I think it wasn't until
 25 November that there was reference to it, but I think we

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1 didn't discuss it then because it seemed to be worded
 2 that I'd only just received it and I hadn't had the
 3 opportunity to digest it. But we did discuss it
 4 subsequently and the issues that I've raised with you
 5 about training and leaseholder gas appliances and all of
 6 those things are all kind of set out in point.
 7 Q. Can you explain why your report to the board contains no
 8 comments at all which are urgent or critical?
 9 A. Well, as I say, I don't believe that I had received that
 10 report, and anything I'd had from them verbally at that
 11 point hadn't raised any concerns that needed to go to
 12 the board.
 13 Q. Are you saying that at the 24 September meeting, Salvus
 14 didn't let on to you that they had identified 19
 15 statutory breaches with a risk rating of 3 and 4?
 16 A. I'm absolutely sure that they didn't.
 17 Q. You're sure that they didn't?
 18 A. Well, unless you tell me otherwise, and I may stand
 19 corrected, but I really don't think that's —
 20 Q. What about by 8 October? Are you sure that even by that
 21 stage you had no idea — is this right? — that Salvus
 22 were going to make those criticisms?
 23 A. I don't believe that I knew, but — yeah, I honestly
 24 don't believe that I knew, and if I did, it would have
 25 been really remiss of me, but it doesn't sound like

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1 something I would do.
 2 Q. Did Anthony Parkes have any input at this point?
 3 A. I think it was still Lornette Pemberton at that stage,
 4 and —
 5 Q. Right.
 6 Was RBKC briefed about the nature and significance
 7 of the failings identified by Salvus when you eventually
 8 did get it?
 9 A. I would be confident that Ann Muchmore had a copy of the
 10 document and then it got discussed at various progress
 11 meetings, and she would have been at some of those.
 12 Q. Indeed. Let's go to one of those, January 2010,
 13 {RBK00052572}.
 14 This is a progress meeting of 26 January 2010. You
 15 can see that you were there, as was Ann Muchmore from
 16 RBKC, and Andrew Furness of Salvus.
 17 Did she have a copy or did you have a copy of the
 18 22 September 2009 Salvus report there at the meeting, or
 19 you'd already seen it?
 20 A. Don't know. I'd definitely already seen it by then,
 21 yes, but —
 22 Q. And had Ann Muchmore seen it by then? Can we take it
 23 that she had?
 24 A. Yes, I can only assume at this stage that yes.
 25 Q. Yes.

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1 Now, this was a progress meeting in relation to
 2 high-risk blocks. Were meetings like this set up to
 3 meet regularly?
 4 A. Yes. Sorry, I was just going to say that this is
 5 a progress meeting with Salvus, so we were trying to
 6 have them at least once a month for the duration of the
 7 contract.
 8 Q. When was the first one?
 9 A. Well, we had a pre-start meeting with them where we
 10 introduced them to the Fire Brigade, it was some time in
 11 September, and then there presumably would have been
 12 a meeting in October. Sorry, I'm not sure, but I think
 13 we largely did have one per month.
 14 Q. Right.
 15 I'll come back to this in a moment. I'm just trying
 16 to get to the bottom of your evidence about when you
 17 first saw the 22 September Salvus report. You say you
 18 didn't have it at the meeting of 24 September and you
 19 hadn't had it by the time of your 8 October report.
 20 That's what you're telling us.
 21 A. Well, that's what I remember.
 22 Q. Right. Do you think you had it by December?
 23 A. I think I had it by November, because I think there is
 24 a November meeting that references it, but my memory's
 25 not as great as it should be, sorry.

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1 Q. Right.
 2 Let's then look at {TMO00873623}, please. This is
 3 a report of 10 December 2009 by you, as you can see.
 4 If you go to page 2 {TMO00873623/2}, you can see
 5 paragraph 4.5. You tell the board — do you see?
 6 A. Yes.
 7 Q. "We have also received a 'Management Report' from the
 8 Consultant which sets out the fire safety framework
 9 within which we and our [contractors] should be
 10 working."
 11 There is no hint in that sentence there or anywhere
 12 else in this report we can find of the 19 statutory
 13 breaches or any statutory breaches identified by Salvus
 14 in their 22 September 2009 report; do you know why that
 15 is?
 16 A. No, I don't, but any reports that I drafted for the
 17 board would have gone through my line manager, and she
 18 would have also had a copy of the report, so I can't
 19 give you an explanation for that. They certainly should
 20 be referenced.
 21 Q. Do you ever remember passing on even the gist of the
 22 criticisms made by Salvus in their September management
 23 report to the TMO board?
 24 A. I can't recall doing it, but I would have — Lornette
 25 and I would have spoken about it at length, so unless

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1 she perhaps took something to them that I'm unaware of,
 2 I don't know.
 3 Q. Do you ever remember a discussion about how much, if
 4 any, of that report you were going to communicate to the
 5 TMO board?
 6 A. No, I don't.
 7 Q. Can you account for why, on the face of it, this
 8 paragraph says absolutely nothing about any of the
 9 statutory breaches or any of the defects in fire safety
 10 management that Salvus had identified in that September
 11 management report?
 12 A. No, I can't give you an explanation.
 13 Q. Let's go back, then, to the progress meeting note,
 14 please. This is {RBK00052572/3}, please, at the bottom.
 15 It says under "4. Salvus Management Report
 16 (Fire Safety Policy and Procedures)", 4.1:
 17 "Janice had prepared a list of queries she wanted to
 18 raise with Salvus and these were circulated and
 19 discussed. Responses given as follows (numbering
 20 relates to the points on the Management Plan) ..."
 21 There then follows, if you scroll down to page 4 and
 22 on, a list of some 15 bullet point queries.
 23 At the bottom of page 3, for example, 3.1 — I'll
 24 just show you one or two examples — it says:
 25 "JW advised that training records are available from

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1 the H&S or HR Team."
 2 Then bottom of page 4 {RBK00052572/4}, item 9.1,
 3 penultimate bullet point there:
 4 "JW advised that the TMO Emergency Plan is available
 5 to all staff on the Intranet. AF confirmed that this
 6 would be sufficient providing all staff have access to
 7 the intranet. JW advised that this is the case."
 8 Then top of page 5 {RBK00052572/5}, 9.3:
 9 "Requirement for 'formal procedures to deal
 10 effectively with fire safety issues associated with
 11 disabled or vulnerable people.' JW outlined the TMO's
 12 current approach and asked AF to clarify this
 13 requirement. AF suggested that a formal documented
 14 system needs to be implemented."
 15 A. Yes.
 16 Q. Now, I've shown you those really as a selection.
 17 It doesn't appear that you raised those queries with
 18 Salvus on 24 September 2009, or did you?
 19 A. Sorry, I ... sorry, this is January, is it?
 20 Q. Yes, this is 26 January —
 21 A. I'm sorry, I don't know. It will be whatever it says in
 22 the minutes.
 23 Q. Right. Do you know or do you remember what policy
 24 documents you did show Salvus at the 24 September 2009
 25 meeting?

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1 A. No.
 2 Q. Right.
 3 It appears from this meeting or the note of this
 4 meeting that actions identified in that management
 5 report still required actioning; is that right?
 6 A. Some did, definitely, yes.
 7 Q. Were you still required to put in place an adequate
 8 policy and supporting arrangements to explain how the
 9 TMO will meet the objectives set out in a future
 10 strategic policy statement to ensure suitable and
 11 sufficient fire safety is maintained at all times as per
 12 action point 1.2 from the —
 13 A. Yes.
 14 Q. You were?
 15 A. We still were required to do it because we hadn't had
 16 the opportunity to. We were trying to go through all of
 17 them, identify what we already had in place that Salvus
 18 may or may not have been aware of, identify what was
 19 left, figure out what the priorities were, get on and
 20 do.
 21 Q. And you were required to do that in line with the
 22 timescales in that plan, which was either three months
 23 or agree a plan within six.
 24 A. Absolutely.
 25 Q. And what were you doing, agreeing a plan within six or

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1 actually doing them within three?
 2 A. I couldn't do them within three, I didn't have the
 3 capacity to.
 4 Q. Right. Did you ask anyone within RBKC to give you the
 5 capacity to do it within three?
 6 A. No.
 7 Q. Why is that?
 8 A. I can't tell you, really. I don't think I thought that
 9 was an option. I was hoping to get through it as
 10 swiftly and effectively as possible. We made quite
 11 a lot of progress in quite a short space of time, but
 12 no, we didn't get through it all in the time I would
 13 have wanted to.
 14 Q. Why not go for the three months rather than just a plan
 15 within six? Given that RBKC were effectively at this
 16 meeting, they were at the table, so to speak, why not
 17 simply ask RBKC for the support so that you could
 18 satisfy this recommendation within the three months
 19 recommended?
 20 A. I can't answer that. I must have felt it wasn't
 21 an option, but I can't answer that beyond ... sorry.
 22 Q. You must have felt that it wasn't an option; why did you
 23 feel that it wasn't an option? I would like to
 24 understand that.
 25 A. We worked in an environment where budgets are

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1 constrained, that, you know, there isn't a large pot of
 2 money that can be dipped into on a regular basis, so
 3 I must have felt that that wasn't something that was
 4 available to me. But I can't really tell you any more
 5 than that.
 6 Q. Right.
 7 A. Sorry.
 8 Q. Did you tell the executive team at any point or the TMO
 9 board at any point or RBKC that there was no strategy or
 10 policy in place that met the TMO's obligations under the
 11 RRO as highlighted by Salvus?
 12 A. I would have spoken to Lornette, who was the executive
 13 director with health and safety responsibility. She
 14 would have been aware of all of the shortcomings and
 15 what I was — what we were trying to put in place to
 16 address as many as possible, and she would have — I'm
 17 assuming she would have fed into the executive team.
 18 Q. When Carl Stokes became the TMO's sole fire risk
 19 assessor in September 2010 —
 20 A. Yeah.
 21 Q. — I'm going to come on to that in a lot of detail
 22 later — do you remember sending him at that time the
 23 Salvus FRA management report of September 2009?
 24 A. I believe I would have done, yes.
 25 Q. Yes. Why did you send it to him?

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1 A. Well, what I didn't do was update it, which goes back to
 2 my point about time and record-keeping. I wasn't clear
 3 whether Salvus had shared that with him. I assumed that
 4 they had, but just in case, for the absence of doubt, as
 5 our fire risk assessor, he needed to be aware of any
 6 areas that were still areas of concern.
 7 Q. He told us that he didn't recall seeing it and didn't
 8 recall asking you for confirmation that the items had
 9 been remedied. Is that right, he didn't ask you those
 10 questions?
 11 A. I don't recall us sitting down and going through the
 12 document in detail, but we had had discussions about how
 13 we were addressing all sorts of things and how we'd
 14 extended — you know, some specific things like the
 15 caretakers' checklists and whatever. So I'm not sure if
 16 he's right or if he's not, sorry.
 17 Q. Did you expect Carl Stokes to read the document you sent
 18 him?
 19 A. Yes, of course.
 20 Q. Did you expect him to give you any advice about it or
 21 about, if things had not been done, how they should be
 22 done?
 23 A. If he wasn't clear about the progress of any of the
 24 issues then I would expect him to come back and
 25 challenge me and ask for why they were outstanding and

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1 when they would be completed.
 2 Q. But I take it you never had any specific discussion with
 3 him about that document?
 4 A. Not that I can recollect, but that doesn't definitively
 5 mean it didn't happen, sorry.
 6 Q. Did you ever expect Carl Stokes to incorporate the
 7 conclusions from that fire risk assessment management
 8 report into his own fire risk assessment work for the
 9 TMO?
 10 A. I never really thought about it, to be honest. I think
 11 that the deficiencies had been identified and it was for
 12 us to resolve them and put effective things in place as
 13 soon as possible.
 14 Q. I see. So you didn't regard the outstanding items or
 15 any of the 19 red statutory breaches identified by
 16 Salvus in that report as a matter for your FRA, your
 17 fire risk assessor, and his FRAs?
 18 A. To some extent I think that was a question for him.
 19 I mean, he had the information. I'm confident I would
 20 have briefed him on where we were at and how we planned
 21 to address the ones that were outstanding. We didn't
 22 have a conversation that he should or shouldn't put
 23 things in; he's a fire risk assessor, it's his call what
 24 goes in the assessment.
 25 Q. Did you ever tell Carl Stokes about deficiencies in the

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1 TMO's fire safety management system that Salvus had
 2 identified in the FRA management report?
 3 A. Sorry, I've already given him a copy of the report, so
 4 he's got it. I believe I've briefed him on the progress
 5 we have made and are making in order to close it down.
 6 But beyond that, I don't ... I can't recall any others.
 7 MR MILLETT: I see.
 8 Can I then turn to fire safety strategy and policy
 9 from 2009 to 2017.
 10 Mr Chairman, I'm not going to finish this topic
 11 self—evidently by 1 o'clock, but I can certainly make
 12 a decent start on it in the four minutes available.
 13 SIR MARTIN MOORE—BICK: All right.
 14 MR MILLETT: We've looked at or discussed Salvus'
 15 recommendations in 2009, particularly that the TMO did
 16 not have a fire safety policy statement and that there
 17 were inadequate TMO policies and arrangements for
 18 fire safety at that time.
 19 Do you know when the TMO fire safety strategy was
 20 first created in the form of a written document?
 21 A. No. I know that we published the first version and gave
 22 the LFB a copy in, I think, November 2013. I thought it
 23 had been in existence in one form or another for over
 24 a year beyond that, so it may have been 2012, I'm not
 25 sure.

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1 Q. Right.
 2 Let's then look at an earlier document. We will
 3 come to the November 2013 document now probably after
 4 lunch, but let's start with one earlier.
 5 This is {TMO00870171}. You can see from page 1 that
 6 it is a fire safety policy, "TMO Fire Safety Policy",
 7 and if you look at page 4 {TMO00870171/4}, please, you
 8 can see that it's signed by Robert Black and it's dated
 9 December 2009.
 10 Do you know the circumstances in which this document
 11 came to be created?
 12 A. No.
 13 Q. You sound surprised.
 14 A. I haven't seen this forever. Sorry, it's —
 15 Q. You've never seen this document before?
 16 A. I must have because it's probably me who drafted it,
 17 but —
 18 Q. Well, quite, and I was going to ask you that.
 19 A. But I haven't seen it, sorry. Not for many years.
 20 Q. Let's see how we go, then, in light of that.
 21 Did the Salvus FRA management report provide the
 22 impetus for the creation of this document, do you know?
 23 A. Looking at the timeframe, it looks like probably a first
 24 attempt at putting something together that met their
 25 requirements. So yes is probably the answer to your

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1 question.
 2 Q. Are you speculating or do you actually recall?
 3 A. Could we scroll up so I can —
 4 Q. Go to page 1 {TMO00870171/1}, so sorry, of course.
 5 A. It's all right.
 6 (Pause)
 7 It is trying to make a commitment about complying
 8 with the RRO.
 9 Q. It is.
 10 A. I think you're probably right.
 11 Q. Well, do you know, or are you speculating like I can?
 12 A. I don't know for sure.
 13 Q. Right.
 14 A. I'm sorry. But it's — so what I can say and what I do
 15 recall is we'd struggled for a long time with automatic
 16 detection quite some years before this and before the
 17 RRO came in, and there'd always been a reluctance to
 18 install battery alarms because people were concerned
 19 about liability issues. So some of this progress made
 20 at May 2006 rings a bell, because I think we changed
 21 conditions of tenancy so that if at that stage all we
 22 could install was a battery alarm, at least we could be
 23 clear about responsibilities for testing it, and —
 24 Q. But May 2006 isn't — this is December.
 25 A. Yes, no, I'm just — sorry, at point 2.1 —

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1 Q. Oh, I see. Right, yes.
 2 A. I'm just fixating on that. So —
 3 Q. There is a lot in this about AFD.
 4 A. Right.
 5 Q. Slightly more broad questions. Two—fold.
 6 First, did you provide a copy of the Salvus report
 7 to Robert Black? Did anybody, to your knowledge?
 8 A. I don't know. I don't know whether I did or Lornette
 9 did. I would have thought it likely that we did, but
 10 I can't confirm.
 11 Q. Did this document, the TMO fire safety policy dated
 12 December 2009, make its way back to Salvus?
 13 A. Don't know.
 14 Q. You don't know whether they commented on it or had any
 15 input into it?
 16 A. Truthfully, I don't, I'm sorry.
 17 Q. And you don't know whose decision it was to draft this
 18 document?
 19 A. No. I think — just because of what I've just said
 20 about automatic detection, I think we did have
 21 a document that had been tweaked and amended over
 22 a period of years, so it's possible that we've amended
 23 that to take account of some of the issues that are
 24 being highlighted, but I'm speculating.
 25 MR MILLETT: Right.

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1 Now, take it from me that this document makes no
 2 reference —
 3 SIR MARTIN MOORE—BICK: Mr Millett, I'm wondering whether we
 4 should come back to this after the adjournment, because
 5 it's quite a lot of work to go through this, isn't it?
 6 MR MILLETT: I wasn't proposing to because she hasn't seen
 7 it before.
 8 Mr Chairman, I'm happy to come back to this after
 9 the break.
 10 SIR MARTIN MOORE—BICK: I think that would be best.
 11 I think it's time you had a break now.
 12 THE WITNESS: Thank you.
 13 SIR MARTIN MOORE—BICK: Ms Wray, we're going to stop now so
 14 we can all have some lunch, so we will break there and
 15 come back at 2 o'clock, please.
 16 As I said to you earlier, please don't talk to
 17 anyone about your evidence or anything to do with it
 18 over the break. All right?
 19 THE WITNESS: Okay. No problem.
 20 SIR MARTIN MOORE—BICK: Thank you. Would you like to go
 21 with the usher, please.
 22 (Pause)
 23 Thank you. 2 o'clock, please.
 24 (1.02 pm)
 25 (The short adjournment)

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1 (2.00 pm)
 2 SIR MARTIN MOORE—BICK: All right, Ms Wray, are you ready to
 3 carry on?
 4 THE WITNESS: Yes.
 5 SIR MARTIN MOORE—BICK: Good, thank you very much.
 6 Yes, Mr Millett.
 7 MR MILLETT: Thank you very much, Mr Chairman.
 8 Ms Wray, before the lunch break, we were looking at
 9 {TMO00870171}. If we could just have that back up on
 10 the screen, please. This is the document we looked at
 11 dated December 2009, entitled "Fire Safety Policy".
 12 Take it from me that there is no reference in it to
 13 fire risk assessments, appointing a fire safety
 14 assistant, fire prevention, general fire precautions,
 15 dangerous substances, training of staff or co—operation
 16 or co—ordination with other responsible persons.
 17 I am right, am I, in thinking that this document,
 18 insofar as you are familiar with it at all, doesn't and
 19 doesn't purport to implement the Salvus recommendations?
 20 A. It doesn't, you're quite correct.
 21 Q. Can we then look at {TMO00870933}. I just want to ask
 22 you about what this is.
 23 It's a document entitled, "Fire Protection Systems
 24 Policy & Procedure, Latest Working Document 10th
 25 February 2012 Version Seven". Are you familiar with

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1 this document?
 2 A. Yes, it was drafted by John Borra, who is the policy and
 3 compliance officer, who was based in assets and
 4 regeneration, the technical division, and ... yeah,
 5 I think there were various versions of it.
 6 Q. Right. This one was signed off by the health and safety
 7 committee, as you can see from the box, in June 2012.
 8 Did you have any input into its production?
 9 A. Very little, I should think.
 10 Q. Right.
 11 A. John was based in the technical division and he had
 12 ready access to the contracts management team, so
 13 presumably he would have worked with them to put this
 14 together.
 15 Q. I see.
 16 You can see from the box that versions 1, 2 and 3
 17 are authorised by AD AI&E and then D AI&E. Who is AD
 18 and D?
 19 A. I'm guessing it could be assistant director —
 20 Q. Or director?
 21 A. Absolutely — well, yeah. Assistant director — I'm
 22 assuming AD is assistant director and D is director, and
 23 AI&E were assets, investments and engineering, which was
 24 the name of the assets and regen division before it got
 25 changed.

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1 Q. Before it got changed to —
 2 A. To assets and regeneration.
 3 Q. I see.
 4 Do you know who finally approved it? It says
 5 "Signed off by H&S Committee". Who was it who signed
 6 that off?
 7 A. Don't know, really. It would have just been wafted in
 8 front of the health and safety committee at some stage,
 9 but I don't really recall, to be honest.
 10 Q. How did this document relate to the fire safety policy
 11 dated December 2009 that we've seen, or can you not help
 12 us with that?
 13 A. I think they're entirely separate.
 14 Q. Right.
 15 Was this policy and procedure created in response to
 16 Salvus' recommendations to create policies and
 17 procedures to maintain fire safety systems?
 18 A. It may be one of the ... it may be one of the documents
 19 that John was putting together as part of his input into
 20 that.
 21 Q. Right. I see.
 22 Now, can we look, please, at {TMO00899327}. This
 23 version is dated January 2017, and this is version 8, as
 24 you can see. This was last updated in June 2012, so it
 25 goes from 2012 to January 2017, so it's the next one on.

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1 A. Okay.
 2 Q. Do you know why this document wasn't updated between
 3 2012 and 2017?
 4 A. No, sorry.
 5 Q. Do you know why it wasn't reviewed in June 2013 as
 6 version 7 suggested it should be?
 7 A. No, I don't know that either.
 8 Q. You don't. Do you know what prompted this document to
 9 be updated, what caused it to be updated at that point,
 10 January 2017?
 11 A. I can only suggest that it might be because at that
 12 stage we were reviewing the strategy document, the fire
 13 safety strategy document, and that may have prompted
 14 John to resurrect anything else that he had.
 15 Q. Can you help us with why, although the date of this
 16 document is 10 January 2017, it was going to be reviewed
 17 by May 2017, only five months on from that?
 18 A. Sorry, I can't.
 19 Q. Right.
 20 You can see that you were the person who authorised
 21 this document.
 22 A. Yes.
 23 Q. You sound puzzled. Why is that?
 24 A. Just because it would normally be signed off by the
 25 health and safety committee and not just by me.

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1 Q. Well, it appears to have been signed off just by you.
 2 We've taken it that you were responsible for this
 3 document; is that wrong?
 4 A. Yeah, that's wrong. I mean, it was largely drafted by
 5 John in consultation with his technical colleagues, and
 6 at that point it would normally have come to the health
 7 and safety committee for approval, and I would not
 8 normally sign off somebody else's documentation on my
 9 own, that's not my style.
 10 Q. I see.
 11 I just want to ask you one specific question about
 12 the differences between version 7, which was June 2012,
 13 and version 8, January 2017.
 14 Can we have both up at the same time, please. So
 15 we've got this one, which is this document. Can we have
 16 version 7, {TMO00870933}. I just want to go to page 2
 17 of each document under paragraph 1.2 {TMO00870933/2}
 18 {TMO00899327/2}.
 19 Under 1.2, you can see that there is a list of
 20 "Planned preventative maintenance/service visits ...
 21 carried out as follows".
 22 If you look at the 2017 version {TMO00899327/2} you
 23 can see that there is a reference to the automatic
 24 opening vents as the last item there. Do you see that?
 25 A. Yes.

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1 Q. "Frequency as agreed", and that's absent from the 2012
 2 version.
 3 Do you know why this was added to the fire
 4 protection systems procedure in 2017 only?
 5 A. No. Presumably because it should have been in the
 6 previous one and, for reasons I don't understand and
 7 can't explain, it wasn't.
 8 Q. Well, thank you. My next question was: was the AOV not
 9 a significant omission from the previous drafts of this
 10 policy?
 11 A. Yes.
 12 Q. Yes.
 13 Can I then turn to the document you referred to
 14 earlier on this morning, which was your November 2013
 15 fire safety strategy.
 16 I'd like to start the history of that document,
 17 please, with {CST00001187}.
 18 Now, this is an email dated 18 January 2013 in which
 19 you send a draft copy of something called a "Fire Safety
 20 Policy. DRAFT. Sept 2012" to Carl Stokes.
 21 You say to him:
 22 "Attached is a very, very rough draft of this and
 23 I would be really grateful for your comments.
 24 Specifically, what else should I include, are there
 25 areas where more detail is required, any other

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1 appendices to be included etc. (The last page is a brain
2 dump of other things I maybe should include — what do
3 you think?)
4 "Really appreciate you help with this as I am sick
5 of the sight of it!"
6 Then there is something personal in the last line.
7 Now, you can see from the attachments that it's
8 saved as a draft, September 2012.
9 The attachment is at {CST00002046}, if we look at
10 that, please.
11 You've referred to the document as a fire safety
12 policy, but in fact it's entitled "TMO Fire Safety
13 Strategy".
14 A. Yes.
15 Q. Do I take it that there was no substantive distinction
16 between calling it a policy or a strategy?
17 A. No. I probably hadn't just made my mind up at that
18 time, sorry.
19 Q. Very well.
20 Did you draft this document to address one of the
21 failings or more than one of the failings identified by
22 Salvus in their September 2009 —
23 A. Yes, I did.
24 Q. Yes?
25 A. Yes.

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1 Q. You did.
2 Was it intended, do you know, to replace or update
3 the December 2009 fire safety policy signed by
4 Robert Black we saw earlier, or can you not help us,
5 given your ignorance of that document?
6 A. I think — when I've been pondering the document that
7 you showed me, I wonder if that was my embryonic start
8 at pulling together a safety strategy document that then
9 got parked in view of other work. I can only assume
10 that was the case. I don't think that was ever adopted.
11 So this would have been to replace that, obviously.
12 Q. Right.
13 Now, for the purposes of drafting this document, do
14 you recall whether you referred to any particular policy
15 documents, such as, for example, the LGA guide, which
16 was by then about a year old, or the sleeping
17 accommodation guide?
18 A. I thought I would have mentioned the LGA guide. I may
19 or may not have mentioned the Sleeping Guide, I'm not
20 sure.
21 Q. Did you seek advice or guidance from the RBKC health and
22 safety adviser when you were drafting this document or
23 anyone within their department?
24 A. I don't believe so.
25 Q. Did you seek help only, therefore, from Carl Stokes?

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1 A. From my colleagues. I think the email that you showed
2 me was sent to Adrian and Cyril, my colleagues.
3 Q. It was.
4 A. But I would have also consulted widely in the operations
5 division, because I was trying to reflect the practices
6 that they had in terms of inspections and maintenance
7 and all of the other areas that were under their
8 control.
9 Q. Right.
10 A. Sorry, just one last thing: I may have consulted the
11 Fire Brigade on specific aspects of it or if I was
12 looking to be clear that we were adhering to their
13 standards.
14 Q. Right.
15 Now, we know that Carl Stokes replied with his
16 comments to you, as you can see from this document, and
17 he did so on 1 February 2013. We don't need to go to
18 the email. It is, for reference purposes, at
19 {CST00030180}.
20 Do you know what happened to this draft document
21 after Carl Stokes had returned his comments to you on
22 1 February 2013?
23 A. I don't, other than if it's in a more finalised version,
24 I may have sought comments from my line manager or
25 comments from other people — any changes he's made, if

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1 they've impacted on other people's work. I don't know,
2 sorry.
3 Q. Right.
4 I just want to pick up one thing in this document
5 for the time being, if we may.
6 Can we please go to page 13 {CST00002046/13},
7 paragraph 24, "Fire procedures". I'll read it to you:
8 "Staff who are not fully able-bodied and who may
9 need assistance to be alerted to the fire alarm and/or
10 require assistance to evacuate from the office are
11 required to have a Personal Emergency Evacuation Plan
12 (PEEP). The H&S Team will meet with the individual and
13 together they will complete a proforma clarifying their
14 specific evacuation procedure (in some cases this
15 involves the use of a lightweight 'evac' chair and
16 training of staff in its use) and any additional
17 assistance they will be provided etc. The PEEP will be
18 reviewed on a regular basis and when the needs/ability
19 of the individual change in any way. (A copy of the PEEP
20 Proforma is at APPENDIX 9.)"
21 That's page 33.
22 Now, we will come back to that in due course, but it
23 looks from this document as if it attracted no comments
24 from Carl Stokes; that's right, isn't it?
25 A. Doesn't appear to have, no.

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1 Q. We will come back to that, as I say.
 2 Can we then move on into 2013, and go, please, to
 3 {TMO10002648}.

4 These are the minutes of a meeting of the assets and
 5 regeneration and repairs health and safety group of
 6 18 April 2013, and you are there, as you can see —

7 A. Yes.

8 Q. — from the end of the first line of those present.
 9 Yes?

10 A. Yes.

11 Q. This group, where did that sit within the TMO's
 12 structure of committees, groups?

13 A. So I think it dates back to shortly after we
 14 commissioned Salvus, when we were generating fire risk
 15 actions. Initially I was meeting with managers of the
 16 teams who were receiving the actions on a sort of
 17 fortnightly or monthly basis to try and chivvy them
 18 along and make sure that they were completing the
 19 actions in the required timeframe. I think that that
 20 group then became more kind of formalised, and because
 21 they were operational people mostly, in relation to
 22 repairs and contracts management, the assets and
 23 regeneration and repairs health and safety group was
 24 formed, and I think — I believe John Borra chaired that
 25 group, as their compliance and policy manager.

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1 Q. Right. What happened to that group?

2 A. I don't actually know, to be honest. I'm wondering if,
 3 once we got a workflow, which was imminently due, it
 4 came in on 1 August 2013, actually we were able to
 5 provide them with much better information consistently,
 6 and I'm — and then, actually, the operations health and
 7 safety group started at about the same time. So I think
 8 it got superseded by events, really.

9 Q. I was going to ask you whether this mutated, in part, at
 10 least, into the operations committee.

11 A. Yes.

12 Q. I see.

13 Now, can I ask you to look at page 3
 14 {TMO10002648/3}, please, item 7.1, "Fire Safety Policy".
 15 This is under the heading "Risk Assessment — Progress
 16 Update", fire risk assessment, progress update:
 17 "Fire Safety Policy: Being drafted, nearly
 18 completed. Will include inspection frequency,
 19 evacuation strategy, how we deal with lessee doors etc."
 20 Do you see that?

21 A. Yes.

22 Q. Now, do you recall a discussion on that subject?

23 A. I don't recall it, but we very likely would have had
 24 one.

25 Q. Right. And the fire safety policy, is that the document

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1 which had come back to you from Carl Stokes on
 2 1 February 2013 we saw earlier?

3 A. Yeah, sorry, I obviously keep interchanging the
 4 language, which isn't very helpful, but yes.

5 Q. I see, right.

6 Let's look, please, at later in the year,
 7 {TMO10004726}.

8 This is a set of minutes of the operational health
 9 and safety committee meeting of 15 November 2013. You
 10 are present, second item down, and you can see some
 11 other names from the assets and regeneration and repairs
 12 health and safety group earlier in the year.

13 By now, can we take it that the operational health
 14 and safety group was up and running?

15 A. Yes.

16 Q. If you go, please, to page 6 {TMO10004726/6}, and look
 17 at the last bullet point under "AOB", that reads:
 18 "Fire safety policy — We need to provide the LFB
 19 with our policy in mid-December.
 20 "Janice will circulate the draft policy and would
 21 welcome feedback in advance of this deadline."
 22 Is the draft policy the document that you had sent
 23 to Mr Stokes in the January of that year and had got
 24 back from him on 1 February with the yellow and green
 25 highlighting?

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1 A. It would seem so.

2 Q. Yes. Did you in fact circulate a draft or the draft
 3 policy before that time?

4 A. I probably circulated it several times because it was in
 5 preparation for far too long, as you can see.

6 Q. Right.

7 Do you remember what the document was that you were
 8 looking at at this meeting, or referring to at this
 9 meeting? Was it the one which Mr Stokes had sent back
 10 to you in February or had there been further changes to
 11 it since then?

12 A. I believe there would have been further changes to it.

13 Q. Right. Do you know when those had been made or what
 14 they said or —

15 A. Sorry, I don't off the top of my head.

16 Q. We haven't seen, I think, any of those.

17 Do you remember getting any feedback from this
 18 meeting on that draft, assuming it to be the same
 19 document, or substantially the same document?

20 A. It's likely that they would have taken it away and
 21 I would have had any comments back by separate email.

22 Q. Right. All right.

23 Then let's go to the strategy itself, {TMO00830598}.

24 This is the document we looked at earlier on this
 25 morning.

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1 A. Yes.
 2 Q. And on page 15 it has November 2013 and your name at the
 3 bottom.
 4 Is this the document that was referred to at the
 5 operational health and safety committee meeting on
 6 15 November, do you think?
 7 A. Probably.
 8 Q. Do you remember whether you received any comments on the
 9 substance of this document from the members of the
 10 health and safety committee, the operational health and
 11 safety committee?
 12 A. I don't know — I don't know, is unfortunately the
 13 answer, but there's clearly quite a lot in here about
 14 neighbourhood inspections and suchlike, so I would have
 15 had to be clear that what was in here reflected their
 16 working practices.
 17 Q. Right.
 18 A. So if I didn't get feedback, I would have been chasing
 19 them just to confirm that this was an accurate
 20 reflection of what they were doing.
 21 Q. Do you remember whether you based it on the rough policy
 22 document you had sent to Carl Stokes in January and he
 23 had come back to you on 1 February?
 24 A. Probably.
 25 Q. You don't recall?

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1 A. No, sorry.
 2 Q. Do you remember starting from scratch after
 3 February 2013?
 4 A. No, no, that was my working document. It may have
 5 changed many times subsequently, but yeah, it was based
 6 on that.
 7 Q. When drafting it, what materials did you work from or
 8 refer to, do you think? Go back to the first page, if
 9 you would, please {TMO00830598}.
 10 A. I know that there were some appendices, I think. Did we
 11 append the ESA checklist and suchlike?
 12 Q. Yes, well, if you go to page 16 {TMO00830598/16}, you
 13 are right that that is appendix 1. Just pop that up,
 14 page 16. "Estate Staff Inspection Checklist", that's
 15 appendix 1, so that was appended.
 16 A. Yes.
 17 Q. You drafted that, I assume, did you?
 18 A. I didn't draft the original, but I added to it and
 19 reviewed it and worked with Martin Barr, the estate
 20 services team leader.
 21 Q. Right.
 22 Was it this document that you gave to Nick Comery of
 23 the LFB at the bi-monthly meeting —
 24 A. Yes.
 25 Q. — in December?

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1 A. Yes.
 2 Q. It was. Did the LFB comment on that?
 3 A. No, actually.
 4 Q. They didn't?
 5 A. Never came back to me.
 6 Q. Just for reference purposes, that's {LFB00000987/2},
 7 item 9. There is no need to turn it up, given your
 8 crystal clear recollection of it.
 9 Can I then ask you about the next operational health
 10 and safety committee meeting on 17 January 2014,
 11 {TMO00840384}.
 12 First page, third bullet, minuted:
 13 "Fire policy — Michael and Janice will meet to
 14 discuss any changes.
 15 "Janice informed the group that the Fire Brigade
 16 have already been given the draft; however the finalised
 17 version can be signed off at next months meeting."
 18 Had the fire safety strategy that we saw not been
 19 approved by this time or had it been approved?
 20 A. It had.
 21 Can I just clarify? So Michael was only recently
 22 appointed. He was the Repairs Direct health and safety
 23 manager, and —
 24 Q. That's Michael Lyons?
 25 A. Yes, that's right. And I had already signed it off and,

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1 as you say, given a copy to the Fire Brigade, but
 2 I thought, well, there was value in him seeing what our
 3 strategy looked like, and he might have had something
 4 useful to contribute. We could always have reviewed and
 5 gone for a subsequent version. So I gave that to him,
 6 and — well, probably you'll lead me on to it, but he
 7 sent back something that was entirely different and
 8 based on a structure that we didn't actually have. So
 9 in all of the documentation there is a fire safety
 10 policy which was allegedly written by Michael and myself
 11 that we never adopted because it didn't reflect working
 12 practice.
 13 Q. I think you have encapsulated, in summary, what I am
 14 going to come on to.
 15 A. Sorry.
 16 Q. No, it's all right. Just at this stage, though, on what
 17 was happening at this time —
 18 A. Yes.
 19 Q. — you had drafted the November 2013 fire safety
 20 strategy, you had given that to the LFB in December,
 21 they'd effectively approved it —
 22 A. Yeah.
 23 Q. — but at this meeting, Mr Lyons is brought on board and
 24 he's going to have another look at it?
 25 A. Well, he's their health and safety manager. I wasn't

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1 sure whether he'd have any comments to make, but it was
2 important that he saw it, because obviously he's
3 responsible for the responsive repairs. So if there are
4 things in there that he feels need to reflect their
5 working practices differently or their timeframes or
6 whatever, now was the time to find out, really.

7 Q. What was his role in the fire safety strategy?

8 A. Well, Repairs Direct were always kind of entirely
9 separate, but obviously, when there are actions that are
10 of a responsive nature, then they need to be allocated
11 to them. So, from my perspective, I saw him as
12 expediting anything that needed to be done, making sure
13 it was done to the right standard, that it was done to
14 fire resisting (inaudible), et cetera.

15 Q. Did you discuss any substantive changes with
16 Michael Lyons?

17 A. No, and I was rather surprised that, when he responded
18 to my email, it was with an entirely different document,
19 not the one I sent him.

20 Q. Okay. Let's just take this in stages, then.

21 You say that the LFB were provided with a copy of
22 the draft fire safety strategy. Did they ever get
23 a further version beyond the one that Mr Comery got in
24 December?

25 A. No, they didn't.

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1 Q. Moving on in time, we know that the next operational
2 health and safety committee meeting was on
3 21 March 2014. Let's look at the minutes of that, but
4 really I'm asking you a series of negatives.

5 {TMO00844024}. There is the minute of it.

6 A. Okay.

7 Q. There it is, 21 March 2014. You are present, as is
8 Michael Lyons.

9 Now, one can scroll down through this document, but
10 take it from me that there is no reference in this
11 minute to the fire safety strategy or policy. Do you
12 know why that was?

13 A. Possibly. When I received Michael's email appending
14 an entirely different document, I looked through it and
15 it set up a structure for managing fire safety which
16 wasn't the one that we currently had, and it seemed to
17 reflect that the oversight of the fire risk assessment
18 process would be a contract manager role, newly created,
19 reporting to Alex Bosman, and so I sent — which was
20 news to me. I hadn't been made aware that there were
21 going to be substantive changes.

22 So I sent the copy of the policy through to
23 Anthony Parkes, my line manager, and said, "Actually,
24 Michael's given me this, does this reflect a change
25 that's going to happen?", and he came back and said no,

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1 that wasn't the case, that — I imagine that those
2 discussions must have been had and ultimately they must
3 have decided not to progress that, but I wasn't party to
4 any of those conversations, so I can't really tell you
5 anything more than —

6 Q. No, I'm just trying to work out what happened to the
7 November 2013 fire safety strategy. It was signed off
8 by the operations committee and the LFB, but then was
9 left open. Does this tell us that because of the
10 arrival, if you like, of Michael Lyons, the
11 November 2013 fire safety strategy was never actually
12 formally approved and adopted by either the operational
13 health and safety committee or the health and safety
14 committee?

15 A. No, it was.

16 Q. It was?

17 A. It was adopted, it was merely — from my perspective, it
18 was finalised. I wouldn't have given it to the
19 Fire Brigade if I didn't feel it was. It was just as
20 a courtesy, because Michael was new and he was integral
21 in getting some of the actions progressed, it felt like
22 he at least ought to be aware of what we were saying,
23 but also, if he felt strongly that something needed to
24 be edited, I wanted to give him the opportunity to do
25 that.

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1 Q. I follow. That's very clear.

2 Now, I think we can take the rest of this a little
3 bit more quickly.

4 Can we go, please, to {TMO10040770}. This is a 2014
5 fire safety policy:

6 "Author Job Title: Health and Safety Manager.

7 "Date of issue: January 2014.

8 "Review date: January 2015."

9 At the very bottom of your screen, you can see
10 "Author: Michael Lyons".

11 A. Yes.

12 Q. Is this the document that arrived in your inbox from
13 him —

14 A. I believe it is, yes.

15 Q. — which you were not expecting?

16 A. No.

17 Q. Right.

18 Now, there are various iterations of this document,
19 but the most recent one we have is at {TMO00856458}, and
20 it's got an issue date of May 2014, as you can see
21 there, with joint authorship at the bottom, you and
22 Michael Lyons.

23 A. Yeah.

24 Q. Do you recognise that document?

25 A. No.

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1 Q. Can you explain how your name appears as author?
 2 A. I can't. If — I'm sure this is the same document which
 3 clearly shows the fire safety function sitting within
 4 the contracts management team, in which case I would
 5 never have authored that document because that did not
 6 reflect our structure.
 7 Q. You sound as if you're familiar with this; is that
 8 because you've reviewed this document closely before
 9 giving evidence so you can say that?
 10 A. I think I've scanned it. I'm confident that I've
 11 scanned it.
 12 Q. Fair enough, all right.
 13 So can we take it, then, that this document, as it
 14 were, came from nowhere and went nowhere?
 15 A. Pretty much.
 16 Q. Right.
 17 Let's move on, then, into May 2014 proper,
 18 {TMO10006358}, and I'm going to ask you about
 19 Matt Hodgson.
 20 What I'm showing you is a minute from the
 21 operational health and safety committee meeting on
 22 16 May 2014, and you are present. You can see that
 23 Peter Maddison and Sacha Jevans were also present.
 24 If you go to page 3 {TMO10006358/3}, under the item
 25 "Progress with review" — it's actually part of 3,

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1 I think, although the 3 has gone a bit awry:
 2 "Progress with review/adoption of Matt Hodgson's H&S
 3 policies."
 4 Do you see that?
 5 A. Mm—hm.
 6 Q. It says:
 7 "SJ [Sacha Jevans] raised concerns over the lack of
 8 formality of signing off new processes. PM suggested
 9 that that JW should take the comments/feedback from this
 10 group to Anthony Parkes before presenting to the Board.
 11 "The group discussed how best to finalise/implement
 12 Matt's policies and it was agreed that this should be
 13 tied into the session with ET on 3rd June as well as
 14 including it within the report to the Board meeting in
 15 July."
 16 A. Yes.
 17 Q. Now, "Matt's policies", is that a reference to
 18 Matt Hodgson?
 19 A. It is, yes.
 20 Q. And his role was, what, to include providing health and
 21 safety services to the TMO; yes?
 22 A. He was engaged by Anthony and Robert, I believe, to have
 23 a look at health and safety across the organisation.
 24 This was in — an action in the follow-up to the audit
 25 report which got limited assurance. So he was appointed

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1 to do that, he interviewed quite a few of us and he
 2 eventually produced a report which he presented to exec
 3 team which made quite a lot of recommendations. I think
 4 you might have showed me some of it earlier, the one
 5 where he said I was the competent person, that one.
 6 Q. Yes.
 7 A. So there were a range of things that he recommended, and
 8 some of them were fairly specific policies around
 9 Legionella and suchlike, and he went on — I presume he
 10 was then commissioned to go on and draft some of these
 11 policies. But —
 12 Q. Do you know why — I'm so sorry.
 13 A. No, no. I was going to say, at this stage I think there
 14 was some frustration about there not being any formal
 15 sign-off for the policies that he was drafting.
 16 Q. Right. Was his role to include fire safety policy?
 17 A. No, I don't think he really had a remit specifically in
 18 regards to fire safety policy.
 19 Q. Right.
 20 Why was Sacha Jevans concerned about the lack of
 21 formality about signing off new processes, do you
 22 remember?
 23 A. It was — I mean, I ... sorry. Anthony, from the — to
 24 the best of my recollection, Anthony engaged Matt, and
 25 I had never seen his brief, so I wasn't really clear

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1 what he had been asked to do, but that was absolutely
 2 fine. But then I think the brief also changed, and
 3 I think Sacha's frustration was that she was perhaps not
 4 party to those conversations. I assumed they were had
 5 with all of the executive team, but perhaps not.
 6 Q. Right.
 7 A. So there were things happening that she was unhappy with
 8 or she felt related to her areas and she perhaps didn't
 9 have control over or oversight of. I'm speculating, but
 10 that's my sort of memory of —
 11 Q. No, that's okay.
 12 In simple terms, what was the reason why
 13 Matt Hodgson was retained in the first place?
 14 A. I think it was in relation to the limited assurance
 15 audit, and there was a view: well, let's have a more
 16 rigorous look at all of our compliancy, all of our
 17 health and safety issues and see if there are any issues
 18 that we need to tease out, rather than just look at the
 19 RBKC audit, which was fairly short, fairly brief.
 20 Q. Now, there is no reference here to the 2014 fire safety
 21 policy, or indeed in any of the health and safety
 22 committee meeting minutes in 2014. Is that because, as
 23 you agreed with me earlier, the Michael Lyons draft went
 24 in one ear and out the other?
 25 A. Pretty much, yeah. I mean, it wasn't adopted because it

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1 didn't reflect our practice.
 2 Q. Moving then on to 2015, can I just show you something
 3 from Alpesh Patel, this is {RBK00058245}. This is
 4 Alpesh Patel's second witness statement to the Inquiry,
 5 and he's explaining the March 2016 RBKC audit of TMO's
 6 health and safety system. That's his statement on the
 7 screen.
 8 A. Yes.
 9 Q. Do you remember him being involved in the 2016 audit?
 10 A. Yeah, he was involved in several audits, and so
 11 obviously, in doing that work, he would spend some time
 12 with my colleague, Adrian, and with myself.
 13 Q. If you go to page 12 {RBK0005824512}, paragraph 32, you
 14 will see that he says this at the end of the third line:
 15 "The testing schedule shows that Janice Wray
 16 provided me with examples of the latest internal
 17 policies and procedures, which had recently been
 18 refreshed and updated. Examples of which included the
 19 Water Management Policy and Water Management Procedures
 20 ... Asbestos Policy ... Gas Access and Gas Safety Policy
 21 ... and Fire Safety Policy and Strategy (AP2/38)."
 22 He exhibits AP2/38, and that is at {RBK00058236}.
 23 Let's just tease that out.
 24 It's a document, as you will see, entitled
 25 "Fire safety policy & strategy", which is how he

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1 correctly refers to it, and it's in a format we saw
 2 earlier, the Michael Lyons format.
 3 A. Yeah, it is.
 4 Q. It's dated May 2014, with a review date of 2015, and you
 5 are the author at the bottom.
 6 Do you recognise this document?
 7 A. Not at first glance. Could I look inside?
 8 Q. Absolutely. Let's go to page 3 {RBK00058236/3}.
 9 A. Okay. It looks, at a glance, like me reformatting what
 10 we already had in our strategy document.
 11 Q. Being the November 2013?
 12 A. Yes. It may well go — looks like it goes beyond that
 13 and it mentions the LGA guide, so it looks like
 14 a slightly updated but sort of —
 15 Q. Right. We've seen no record that this document was ever
 16 presented to the operational health and safety committee
 17 for approval; is that correct?
 18 A. Yes, it probably is.
 19 Q. Do you know whether it was ever approved and adopted
 20 formally?
 21 A. I don't.
 22 Q. Given that we have no record that the health and safety
 23 committee approved this document, do you know under
 24 whose authority it was issued, if it was ever issued?
 25 It says "Date of issue: May 2014". Do you know whether

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1 it was actually issued?
 2 A. I don't believe it was.
 3 Q. Right.
 4 A. I wonder if it was in a draft version that I gave to
 5 Alpesh. I can't —
 6 Q. Why would you have given it to Alpesh Patel if in fact
 7 it was never approved?
 8 A. Well, if I'd explained that it was a draft version that
 9 we were looking to work to — I don't know, that's all
 10 I can suggest.
 11 Q. Right. On our review, the content is closely similar,
 12 or similar at least, to the November 2013 fire safety
 13 strategy you drafted and which was approved.
 14 A. Yeah.
 15 Q. Was this intended to be a revised version of that
 16 document?
 17 A. I think that the feedback I had from Anthony Parkes to
 18 the document that Michael Lyons produced sort of said,
 19 "Oh, I like this aspect of it and I like that aspect of
 20 it", and I maybe took on board some of what he said and
 21 tried to redraft. But this didn't get adopted. We were
 22 still — we're still on 2013, apologies.
 23 Q. Right, okay. Then let's move into 2016 proper.
 24 Can we go to your first witness statement, please,
 25 at paragraph 190, {TMO00000890/42}. You say there:

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1 "In November 2016 it was agreed between the TMO
 2 Health and Safety Committee and the RBKC that the TMO
 3 Fire Safety Strategy would be revised ..."
 4 Pausing there, would you agree that the process for
 5 reviewing the fire safety strategy started in
 6 April 2016?
 7 A. Yes.
 8 Q. And we know that because there is a health and safety
 9 committee meeting on 12 April 2016 where that's referred
 10 to.
 11 A. Yes, that's right. I think RBKC got involved by
 12 November, because that's when we were talking to them
 13 about budgets for self-closers and —
 14 Q. Right. Let me just put that up on the screen so
 15 everybody can see what you and I are talking about.
 16 It's {TMO10012811}. Let's have page 1 to start
 17 with, to show you the date and the attendees of the
 18 meeting. We can see you're there, 12 April 2016.
 19 At page 4 {TMO10012811/4}, please, bottom of page 4,
 20 item 6, "Review of Fire Safety Policy and Strategy":
 21 "Janice advised that it was timely to review our
 22 fire strategy to ensure that it continues to be
 23 compliant with legislation and best practice and that we
 24 are able to effectively control the fire risks that we
 25 face."

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1 The result of that was, as you say in your
 2 statement, that there should be a revision.
 3 Let's go, then, to {TMO10024351}. This is the
 4 document that you presented, I think, to that meeting.
 5 Just confirm that, first of all. It's a document
 6 entitled "Review of Fire Safety Strategy", paper 4, so
 7 is that a document —
 8 A. It looks like it.
 9 Q. Page 2 has your name at the bottom. Just go to that.
 10 A. April, yes.
 11 Q. And a date of April 2016.
 12 If you go back to page 1 and look at the second
 13 paragraph of that, you say:
 14 "The Health & Safety Committee is encouraged to
 15 provide their views on our current strategy and any
 16 changes that they feel are required. To assist with
 17 this process a copy of the current strategy is attached
 18 and some initial points for consideration are summarised
 19 below ..."
 20 If you look at page 3 {TMO10024351/3}, the current
 21 strategy is there. That's the November 2013 version of
 22 the fire safety strategy?
 23 A. Yes.
 24 Q. But with a note which says "For review April 2016".
 25 Again, just to be absolutely clear, page 20

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1 {TMO10024351/20} is where we see your name and date,
 2 November 2013.
 3 A. Okay.
 4 Q. So it looks as if, certainly by April 2016, the
 5 November 2013 fire safety strategy was still in force;
 6 yes?
 7 A. Yes.
 8 Q. And hadn't been superseded by the 2014 Michael Lyons
 9 document or the 2015 document that you gave to
 10 Alpesh Patel in the spring of 2016.
 11 A. Yes.
 12 Q. Yes?
 13 A. Yes.
 14 Q. Right, that's very clear.
 15 Now, if we go, please, to page 1 of this document
 16 {TMO10024351/1}, we can see that you say in the first
 17 paragraph:
 18 "It is timely to review this strategy to ensure that
 19 our policies continue to comply with legislation and
 20 London Fire Brigade advice/guidance and requirements."
 21 Pausing there, you set out, after the second
 22 paragraph, a long list of bullet points for review. The
 23 second one is "Management Arrangements for Fire Safety".
 24 The third is "LFB Home Fire Safety Visits". The fourth
 25 is "Fire extinguishers, hose reels, dry & wet risers".

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1 The fifth is about FRAs, and if you look at the third
 2 bullet point or sub-bullet point there, it deals with
 3 material alterations, do you see that?
 4 A. Mm—hm.
 5 Q. "... significant changes to block or type of resident or
 6 major fire ..."
 7 Then the sixth bullet point:
 8 "Stay put evacuation strategy — better publicity?
 9 Now, that was in paper 4, that's what you produced
 10 for the health and safety committee; do you know whether
 11 this paper was presented to any other TMO committee or
 12 the executive team or senior management team, SMT?
 13 A. It would be my assumption that because this committee
 14 feeds directly into the executive committee, and
 15 Barbara's role is executive team health and safety
 16 person, I would assume that she discussed this with
 17 them. Also, as you know, Sacha's also on this group, so
 18 we've already got two members of executive team who are
 19 kind of engaged in this process. I can't tell you what
 20 goes to senior management team, because I was never
 21 a member and I didn't see their agendas or I don't even
 22 know how frequently they met, so I wouldn't be in
 23 a position to advise on that, sorry.
 24 Q. Do you know or can you remember what triggered this list
 25 or this suggestion that there should be a new review and

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1 that it should include these points?
 2 A. We need to review things regularly. The most obvious
 3 reason for it being now is the Adair Tower fire, which
 4 had obviously just happened. But there's a lot of
 5 things here that we've been thinking and pondering about
 6 how we could do differently or how we could do better,
 7 so this is just me kind of doing a brain dump of things
 8 that I think should be considered, but obviously it's
 9 not necessarily comprehensive, it's just a starter for
 10 ten, really.
 11 Q. If we go back to where we were in your statement,
 12 paragraph 190 at page 42 {TMO00000890/42}, please, you
 13 say:
 14 "The main changes we intended to implement were
 15 a more proactive approach to the installation of
 16 self-closing devices flat doors ..."
 17 Do you see that?
 18 A. Yes.
 19 Q. "... across the stock, an increase in the frequency of
 20 FRAs and a requirement for Fire Action Notices in the
 21 communal entrance lobbies of all blocks. I provide the
 22 history ..."
 23 Now, at the beginning of that paragraph, you refer
 24 to an agreement with RBKC to cover those topics.
 25 Who was it at RBKC who was involved in the decision

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1 to make those changes, do you know?

2 A. My understanding is that Barbara — was it called joint

3 management team? I think Barbara discussed with Laura

4 and Laura's colleagues. I don't know at what stage the

5 engagement started, but the decision about self-closers

6 and inspection programmes was discussed with, I believe,

7 Laura and possibly also Amanda, I'm not clear.

8 Q. We then come to 2017, and I just want to ask you about

9 the version of the fire safety strategy in play in that

10 year. It's the year of the fire.

11 {TMO10017036}. This is the TMO fire safety strategy

12 dated June 2017.

13 A. Yes.

14 Q. If we go to page 17 {TMO10017036/17}, we can see it

15 bears your name and date.

16 I'll come back to — well, I may not need to.

17 In your statement, can we just look at your first

18 statement, please, at page 41 {TMO00000890/41},

19 paragraph 186. You say:

20 "At the time of the fire the TMO had in place a Fire

21 Safety Strategy, which was an overarching strategy

22 document outlining how fire safety was to be approached

23 by the organization ..."

24 You refer to the document I've just shown you.

25 "I produced the first draft which was reviewed by

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1 the Health and Safety Committee before it went to the

2 Executive Team. I am aware that there are many draft

3 versions of this Strategy as it was often reviewed and

4 discussed however a version was always in force at any

5 given time."

6 Then if we go to paragraph 191 of your statement,

7 page 42 {TMO00000890/42}, it says:

8 "At the time of the fire in June 2017, the updated

9 TMO Fire Safety Strategy was in its final draft stage

10 and I recall that we had a final review meeting the day

11 before the fire ... The updated Strategy took longer to

12 implement than expected due to lengthy discussions that

13 took place between Barbara Mathews and the RBKC in

14 respect of the process and programme for retrofitting

15 self-closing devices to every flat entrance door in the

16 stock. I was not involved in these discussions however

17 my understanding is that the TMO recommended completing

18 the retrofitting programme within three years whereas

19 the RBKC required the programme to be completed over

20 five years."

21 Now, is it right, therefore, that the 2017 fire

22 safety strategy was still under review at the time of

23 the Grenfell Tower fire?

24 A. It was agreed on the 13th. It was agreed at the meeting

25 the day before.

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1 Q. It was agreed. I see.

2 A. Yeah.

3 Q. So it was in place at the time of the fire in that

4 sense?

5 A. Yeah.

6 Q. Right.

7 Now, given that the process of revision had started

8 in April 2017, do you know why the updated version of

9 the fire safety strategy only reached the TMO health and

10 safety committee in June of that year?

11 A. I think, without going back in the minutes — and the

12 minutes will be clear. I think it had been to the

13 committee on at least one or two occasions before, but

14 there was quite a lot that we were tweaking and we were

15 looking to review, and there were things like in terms

16 of the self-closer programme, we were asked to obtain

17 prices, and there were various things that were outside

18 of my control that I needed to get responses to. I —

19 just unfortunately these things take longer than you

20 would ever wish them to.

21 Q. Yes.

22 Now, I want to go back to the FRA programme and what

23 happened with that.

24 Now, it's right, isn't it, that the high-risk

25 programme of FRAs had been undertaken by Salvus?

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1 A. Yes.

2 Q. And that that programme came to an end in March 2010.

3 A. Yes.

4 Q. If we go to your first witness statement at page 30

5 {TMO00000890/30}, please, paragraph 135, we can see what

6 you say there. You say:

7 "At the commencement of the High Risk FRA programme

8 one of the commitments we gave to the LFB was that we

9 would evaluate the performance of our Fire Risk

10 Consultant. This was jointly undertaken by the TMO and

11 RBKC at the conclusion of the programme in February 2010

12 and it was decided that we would undertake a procurement

13 exercise to appoint a Fire Risk Assessor for the medium

14 and low risk phases of the programme."

15 Now, why was that commitment given to the LFB, do

16 you know?

17 A. Well, I think they wanted to be assured that even though

18 we were doing all sorts of checks and including them in

19 vetting pro formas and attending progress meetings, that

20 if we had any concerns or issues, we would address them,

21 we wouldn't let problems continue. I'm not suggesting

22 there were any, but I think it seemed reasonable to be

23 reviewing progress.

24 Q. Was the evaluation of Salvus carried out?

25 A. Yes, I believe it was.

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1 Q. And what was the upshot?
 2 A. I think we agreed with RBKC that we would re—procure.
 3 We were quite happy for Salvus to be one of the people
 4 on the list, but I think we felt that we'd learned quite
 5 a lot from the programme, and we would — we were in
 6 a better — we were kind of a bit better informed about
 7 doing the procurement on this occasion. So that was the
 8 decision.
 9 Q. Right. Do you know who carried out that evaluation?
 10 A. It would probably have been the people who were involved
 11 in the procurement initially, so it may have been
 12 Valerie Sharples, I would imagine it was Ann Muchmore.
 13 I think it was the people that were involved in the
 14 original procurement of Salvus.
 15 Q. Right. And what did they use as their benchmarks or
 16 objective criteria against which to evaluate Salvus'
 17 performance?
 18 A. Well, we looked at what we'd originally asked them to
 19 achieve, and, you know, had they met their programmes?
 20 Were we happy with the quality of their documentation?
 21 Was the Fire Brigade happy with the quality of their
 22 documentation? Where we had specific areas where we
 23 were seeking their advice, did we find that helpful?
 24 Were they responsive? All the things you would expect,
 25 really.

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1 Q. Why was it decided that the TMO and RBKC would re—tender
 2 for the medium—risk and low—risk programmes when you
 3 weren't unhappy with Salvus?
 4 A. We weren't unhappy with Salvus, we just felt that we
 5 understood more clearly what we needed and —
 6 Q. Right.
 7 A. I mean, as I say, they were always going to be on the
 8 tender list, so we weren't not giving them
 9 an opportunity to compete.
 10 Q. You say you weren't unhappy with Salvus?
 11 A. I mean, there were things that they were — I was
 12 frustrated with, but I wasn't unhappy with them.
 13 I mean, the quality of their work was good.
 14 Q. Let's go to {RBK00053588/3}, please.
 15 This is an email from you to Ann Muchmore of the
 16 RBKC on 11 February 2010, copied to Lornette Pemberton
 17 and others, including Robert Black:
 18 "Ann
 19 "Further to our brief conversation following the
 20 last progress meeting with Salvus, as the high—risk
 21 programme is on schedule to complete as agreed by late
 22 March/early April it is now timely to consider how the
 23 medium—risk and low—risk FRA programmes will be funded,
 24 resourced and progressed. I anticipate that we have
 25 a few options ..."

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1 Then under the third paragraph, you say this:
 2 "Look to find an alternative method ...
 3 "I can confirm that Salvus are currently on schedule
 4 to complete the high risk programme within the agreed
 5 6 month timespan. Additionally, it is fair to say that
 6 the programme has progressed relatively smoothly and
 7 generally with the approval of the LFB. However, I have
 8 some concerns that Salvus are very rule—bound and
 9 despite what they say about being prepared to challenge
 10 the LFB and acting on our behalf as we are their client,
 11 I believe they have shown some reluctance to challenge
 12 the LFB on thorny issues. For example, I haven't found
 13 them to be hugely helpful or proactive on our behalf on
 14 the issue of whether or not we need to do as the LFB
 15 insist and install dry risers at Gillray House etc."
 16 Then you go on to say at the very end of that
 17 paragraph:
 18 "Therefore, personally, I would be keen to tender
 19 the medium—risk programme in the same way as we did with
 20 the high—rise."
 21 Now, when you say that Salvus was very rule—bound
 22 and reluctant to challenge the LFB on thorny issues,
 23 what did you mean?
 24 A. The example that I'm quoting there is — it relates to
 25 four identical blocks which were, I think, about seven

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1 storey, just a shade over 18 metres tall, so you would
 2 therefore expect them to be built with a dry rising
 3 firefighting main. For reasons none of us understood,
 4 they weren't, and the Fire Brigade were saying that we
 5 needed to retrospectively fit dry rising mains on each
 6 of the four buildings.
 7 This goes back to what I did say this morning.
 8 Building control's view was that that retrospective
 9 fitting wasn't required. I needed to be absolutely
 10 clear that there wasn't another option for how we could
 11 mitigate any potential risks before I went back and said
 12 to people, "I need this amount of budget to do this
 13 amount of work", and it was quite frustrating that
 14 I couldn't get anyone to give me a straight answer.
 15 Salvus kind of slightly sat on the fence on it.
 16 I didn't feel that they — when I needed them to give me
 17 a clear steer, I didn't feel that they did. And,
 18 you know, their work was really good, all the stuff that
 19 I've said here is absolutely true, but when we really
 20 needed to be clear about how we jumped in a different
 21 situation that was going to impact on budgets —
 22 because, fine, we could have found the budget, but it
 23 would have meant that something else didn't happen. So
 24 I needed to be absolutely sure that when I went back to
 25 say, "We need to do this, this is what it costs and this

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1 is how long it would take, and we need to do it because
 2 it's an absolute requirement", that I was right. But
 3 I didn't have the confidence to do that because there
 4 was a lot of toing and froing and nobody giving me
 5 a definitive steer.
 6 So that's the kind of — and that's the kind of
 7 issue I had when we appointed Salvus in the beginning.
 8 I said, "These are a few issues like this that come up
 9 that we've been unable to really bottom out".
 10 Q. Right.
 11 A. So they were aware that — and to be fair, they had
 12 consistently tried to get a meeting with I think it was
 13 Steve Turek, because Andy Furness sat on, I think,
 14 an IOSH committee with fire safety — a fire safety
 15 remit, and so he met with quite a lot of kind of
 16 high-ranking LFB people, so I think he thought that was
 17 the way that we would get the definitive answer that we
 18 needed about standards, and in the end, after much toing
 19 and froing, we were told that he declined all meetings
 20 with us.
 21 So, on the one hand, I've got the fire risk assessor
 22 telling me that we need to do something, but not being
 23 able to really back it up, so I'm not confidently in
 24 a position to go back and tell people that we need to
 25 find budget to do this, and I'm sort of left where I was

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1 at the start of the programme.
 2 So that's my — sorry, you're probably getting all
 3 of my frustrations.
 4 Q. What was it that you wanted from a new, independent fire
 5 risk assessor that Salvus weren't giving you?
 6 A. I just wanted them to be able to give me a clear view of
 7 what I needed to do and what I didn't, and if there was
 8 another way of mitigating risk, could they tell me what
 9 that was. But I wasn't getting another way of
 10 mitigating risk, I was sort of just getting a problem
 11 that I couldn't find a solution for.
 12 Q. It doesn't really say that, does it? What it says is
 13 you have some concerns that Salvus are very rule-bound.
 14 What was the problem with that?
 15 A. Well, I can only really reiterate that they weren't
 16 giving me an answer to the problem that I had, and they
 17 were —
 18 Q. That's not quite the same thing, is it? What did you
 19 mean by "Salvus are very rule-bound"?
 20 A. I probably meant that they're inclined to say, "Well, if
 21 the Fire Brigade are asking for it, you probably need to
 22 do it", but not that you definitely need to do it.
 23 Q. Right.
 24 You say:
 25 " ... despite what they say about being prepared to

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1 challenge the LFB ... I believe they have shown some
 2 reluctance to challenge the LFB ..."
 3 You're not really saying that they're giving you
 4 muddy advice or they're being equivocal; what you're
 5 saying is they're taking the LFB's side as opposed to
 6 taking your side. That's how I read that. Is that
 7 an unfair reading, Ms Wray?
 8 A. That might be what it says, but that wasn't what I meant
 9 it to say, having lived it. My view was I just needed
 10 to be absolutely sure. For example, in the case of the
 11 flat entrance doors, once we knew we needed to do it, we
 12 found the budget to do it and we did do it. It was just
 13 that this — and this issue didn't just relate to these
 14 four blocks, we had I think a couple of other blocks, so
 15 it's quite a big commitment, so I need to be absolutely
 16 clear that we can't mitigate the risk in other ways and
 17 they weren't giving me that, they weren't ...
 18 So they're my kind of fire safety specialist advice,
 19 and I'm still caught between the Fire Brigade and
 20 building control without a clear steer.
 21 Q. You see, the LFB was the enforcing authority under the
 22 RRO, wasn't it?
 23 A. Absolutely.
 24 Q. So why not just do as they asked or required, rather
 25 than setting out to test what they're saying or

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1 challenge, actually, is the word you used? Why are you
 2 wanting to challenge the enforcing authority?
 3 A. I'm only wanting — I'm wanting to do what the enforcing
 4 authority need me to do, but what I'm saying is that in
 5 some circumstances, that isn't the only way to mitigate
 6 the risk. So I'm trying to be clear that if there is
 7 an alternative which may be less invasive for residents,
 8 you know, maybe just as effective, hopefully just as
 9 effective, could we find out what that is. Because the
 10 impact of everything that we agree to do means that
 11 somebody else won't get heating or hot water or —
 12 that's just the world that we lived in, so you needed to
 13 be absolutely sure that what you've been asked to do is
 14 what you need to do in that way, and if I had been
 15 assured of that, I'd have gone back and fought with
 16 everybody to get that to happen, but I wasn't yet in
 17 a position to confirm that that's what we absolutely had
 18 to do.
 19 Q. You see, I wonder whether this evidence you're giving is
 20 just a bit of a gloss now on the historical words that
 21 you used, which I've shown you, and if you really did
 22 want to take an approach which was co-operative with the
 23 LFB to see if there was a more cost effective and
 24 practical way of going about satisfying their
 25 requirements, you might have said so, but instead you

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1 want to go into a tender because Salvus are reluctant to
 2 challenge the LFB on thorny issues. That's a different
 3 approach, isn't it? It's more hostile. Do you accept
 4 that?
 5 A. Well, it wasn't meant to be. I'm generally not
 6 a hostile person, so that wasn't my intention. Probably
 7 my frustration is coming out here because this is
 8 exactly the kind of issue that led to the threat of
 9 enforcement action, because we got into this: does this
 10 need to happen? Building control are saying, "No, no,
 11 it doesn't", Fire Brigade — and me caught going, "Well,
 12 what is it you want me to do? It's really important, we
 13 need to know. What is the standard here?" And in the
 14 meantime you've got the Fire Brigade then saying, "Well,
 15 no, at high level, we're refusing to meet with you".
 16 And actually, to be fair, I think Salvus had their
 17 own frustrations, because they had started off the
 18 programme with us saying we need to be sure that we're
 19 meeting the Fire Brigade's requirements in terms of the
 20 standard setting. So they wanted this meeting as much
 21 as I did, not just in relation to this issue but other
 22 issues that they felt weren't being addressed.
 23 Q. Can we then move further into 2010, {TMO10037421/8}.
 24 This is part of your report to the operations
 25 committee in May 2010, and at page 8, under

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1 paragraph 12.2, you ask them "to note our proposed
 2 approach to progressing the medium risk blocks"; do you
 3 see that?
 4 A. Yeah.
 5 Q. Did you have to get approval or sign-off from the
 6 operations committee in order to progress the tender?
 7 A. I can't remember, actually. I would have —
 8 procurement's not something I know much about, so
 9 I would have always gone to procurement colleagues to
 10 ask them what I needed to do.
 11 Q. Right.
 12 A. I think that the borough also funded the medium-risk
 13 programme, so I would have had to get their sign-off as
 14 well.
 15 Q. You can see at the top of that page, under "Legal
 16 Issues", in the last sentence of paragraph 9.1,
 17 "'responsible persons' are the TMO and RBKC". Do you
 18 know what made you say that in this document? Or was
 19 that just an observation —
 20 A. We — I think there was a standard — sorry to speak
 21 over you. I think there was a standard format that we
 22 had to follow. We had to have "Legal Issues", we had to
 23 have "Communication and Resident Engagement". I think
 24 there was a template we were required to use for
 25 committee reports, and so I — that was just my

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1 standard.
 2 Q. Right.
 3 We can see the meeting at {TMO10037437/88}. This is
 4 the minute of the meeting of 25 May 2010.
 5 A. Okay.
 6 Q. Operations committee. Do you see that?
 7 A. Yeah.
 8 Q. You're in attendance, after the "and". Can you see
 9 that?
 10 A. Yes.
 11 Q. Yes.
 12 If we go to page 89 {TMO10037437/89}, agenda item 5
 13 was "Fire risk assessments", you can see that there, and
 14 the committee received a report on progress.
 15 There is no minuted discussion in this document
 16 about the fire risk assessor himself. Do you remember
 17 whether any questions were asked about the fire risk
 18 assessor and competence?
 19 A. Sorry, I wouldn't remember.
 20 Q. Right.
 21 Once the high-risk programme had ended, did you
 22 consider whether there would be a need for regular fire
 23 risk assessments of the high-risk properties?
 24 A. I think we should have. I think at that stage we were
 25 gearing up to get the medium-risk on the ground as soon

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1 as possible because, as you know, we had our three-year
 2 deadline of getting through the whole process. So I'm
 3 not sure it was on our radar at that point in time, but
 4 it came quite quickly.
 5 Q. Do you remember discussing with RBKC the subject of
 6 putting a programme and funding in place for having
 7 regular FRAs for your high-risk properties in your
 8 portfolio?
 9 A. Not specifically, but we had made a commitment and we
 10 would find the money somehow or other.
 11 Q. Right.
 12 Now, at this stage, May 2010, who did you envisage
 13 would carry out the continuing FRAs for the high-risk
 14 blocks in the TMO stock?
 15 A. I was probably quite short-sighted and didn't give it as
 16 much consideration as I should have done.
 17 Q. So is the answer that you didn't envisage anybody at
 18 that stage?
 19 A. It was just off my radar. We'd only just completed them
 20 and the oldest one was six months old, and there were no
 21 material alterations happening on any of the blocks, so
 22 I thought I had a little bit of time, and at the moment
 23 medium and moving on to low will get the whole stock
 24 assessed, so that was probably my priority.
 25 Q. Let's then talk about medium and the appointment of

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1 Carl Stokes.
2 Can we look at your second statement, please,
3 {TMO00842341/3}, paragraph 11.
4 You set out there the documents that you sent to
5 Carl Stokes on 6 August 2010 inviting him to tender for
6 the medium-risk FRA programme. Do you see that?
7 A. Yes.
8 Q. One of the documents you exhibit there is the
9 consultants' brief of July 2010. Can I take you to
10 that. It's at {TMO00842371}.
11 Did you draft that document?
12 A. No, I doubt it. It was probably drafted by my colleague
13 in the procurement, the professional services officer,
14 I don't think it would be me.
15 Q. Right. Who was that, please?
16 A. Janet Rhymes, the lady's name was.
17 Q. Yes, I see. You referred to her earlier on.
18 Did you have any input into the contents of this
19 document?
20 A. I'm sure that I did, but ...
21 Q. Do take time to have a look at it.
22 If we just scroll down to page 3 {TMO00842371/3},
23 for example, which is the general information and
24 requirements, it may refresh your memory.
25 (Pause)

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1 A. I'm sure that I did, but I —
2 Q. You can't recall which parts?
3 A. No, sorry.
4 Q. So Janet Rhymes, possibly you. Anybody else, do you
5 think?
6 A. I'm sure we would have shared it with RBKC colleagues,
7 they may or may not have had something they wanted to
8 add. I'm not sure if Valerie was also still involved as
9 the project manager. I'm speculating, sorry.
10 Q. Whilst we're on page 3, can we look at paragraph 1.5.
11 It says there:
12 "It is a requirement of the client that the
13 consultant holds a current fire risk assessment
14 qualification e.g from IOSH, NEBOSH, the Northern
15 Ireland Fire Safety Panel or similar to be submitted for
16 approval by the TMO before the consultant's tender is
17 accepted. (See Part 4: Quotation Instructions)."
18 Just pausing there, can we go to page 25
19 {TMO00842371/25}, which sets out the information that
20 the consultant tendering for the project was required to
21 supply. You can see there "Quotation submissions".
22 In the list at the very foot of the page, 7.1(d) is
23 "Additional Information", and under (iii) it says:
24 "Details of professional qualifications, in
25 particular fire risk assessment qualifications, and

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1 experience of the Project Leader and proposed team
2 members who will carry out the assessments."
3 Do you remember whether that was something in
4 respect of which you had input?
5 A. I don't. The preceding thing that you just showed me
6 setting out the possible qualifications I think came
7 from RBKC. I think this was left from the initial
8 procurement and I believe that Alexis Correa put that
9 bit in himself when we did the original tender for the
10 high-risk.
11 Q. I see, thank you.
12 Do you remember what Carl Stokes gave you to support
13 by way of evidence his fire risk assessment
14 qualifications and experience?
15 A. I don't as we sit here now, but probably quite a lot.
16 Q. We understand that Mr Stokes gave you a loose set of
17 documents, together with his public liability insurance
18 and certificates. I can show you that. It's at
19 {TMO00880581}. That is his insurance certificate.
20 Do you remember whether he provided you with any
21 information about his experience as a fire risk
22 assessor?
23 A. I can't recall. I understood what his work experience
24 was, I knew that he'd been in the fire and rescue
25 service as fire safety officer, and by then, obviously,

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1 we knew that he'd undertaken quite a few of the fire
2 risk assessments on our high-risk blocks, so we'd had
3 first-hand experience. His work was obviously quality
4 checked by Salvus, because that's how they operated.
5 But we'd been sharing the FRAs with the
6 Fire Brigade, and I recall at the end of the high-risk
7 programme we had a hard copy of all 110 and the Brigade
8 asked for that, so I dropped it off at the fire station.
9 So we had sort of quite a lot of belief that he had good
10 experience directly on our blocks.
11 Q. Did you ever receive a CV from Carl Stokes?
12 A. Can't remember.
13 Q. Do you remember if it was received as part of the tender
14 submission?
15 A. It's possible, sorry, I can't remember.
16 Q. Right. Did it ever come from Salvus? Did Salvus ever
17 provide you with a CV for Carl Stokes when he was part
18 of the high-risk programme?
19 A. I do recall asking for the details of all of their
20 assessors, but I can't recall what documentation I did
21 get, and in fact a couple of them never worked on the
22 project, so some of the names didn't materialise.
23 Sorry.
24 Q. Can we go to {TMO00842327}.
25 This is the tender evaluation report that you

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1 produced on 27 September 2010 at the very end of the
2 tender process, which you refer to in paragraph 12 of
3 your second witness statement {TMO00842341/3}. There is
4 no need to go to that.

5 Do you remember who was part of the panel who
6 conducted this tender evaluation report?

7 A. I'm assuming that it was Ann Muchmore and Janet Rhymes
8 or Valerie Sharples.

9 Q. I see. So a combination of RBKC and the TMO?

10 A. Yes.

11 Q. If you look at paragraph 1.2, it says there in the
12 second line:

13 "Additionally, all Consultants attended a formal
14 interview with a panel consisting of two TMO and one
15 RBKC Officer so that further checks on the quality of
16 the consultants could be undertaken and any queries on
17 their submission could be clarified."

18 Do you remember who it was as part of that panel
19 particularly? Was it the individuals you have just
20 referred to, Ann Muchmore, Janet Rhymes and
21 Valerie Sharples?

22 A. I believe so, yes.

23 Q. Do you know what checks on the quality of the
24 consultants were undertaken?

25 A. No, as we sit here now, I'm sorry, I —

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1 Q. Do you recall how that panel went about assessing the
2 requisite experience and qualifications for those
3 tendering for that programme?

4 A. No.

5 Q. In your first witness statement, page 31
6 {TMO00000890/31}, paragraph 137, you say in the middle:

7 "It was agreed that Carl had the right knowledge,
8 competence, experience and enthusiasm to be a good
9 partner for the TMO."

10 That's what you say there.

11 If we go back to the tender evaluation report which
12 we've just been looking at, page 2 {TMO00842327/2},
13 paragraph 2.4 at the top of the page, you say:

14 "The same Consultant, CS Stokes, was rated first for
15 quality and also submitted the lowest price for the
16 six-month programme."

17 Do you remember how you and the panel were assured
18 of Carl Stokes' qualifications, competence and
19 experience for the purposes of carrying out the
20 medium-risk FRA programme?

21 A. Well, we would have — we must have had a CV, we must
22 have had details of his work experience, we knew what
23 he'd been doing for Salvus on our high-risk properties,
24 we would have known what CPD he'd been doing, and we
25 must have used that to make a judgement. I mean, we had

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1 set questions, as you would expect, and we scored them
2 according to sort of an agreed approach, but we did it
3 individually and then we compared notes, as you would
4 expect again.

5 Q. You referred to his CV a minute ago. Let's look at it.
6 It's {CST00001895}.

7 Just to be clear, is this the document that you
8 received from Carl Stokes as part of his tender?

9 A. It could have been.

10 Q. Right. I mean —

11 A. I mean, I don't know whether he's changed it since.

12 Q. I see what you mean.

13 Look at his qualifications there, under the heading
14 "Qualifications", was there any particular qualification
15 that told you that Carl Stokes had the relevant
16 knowledge and competence?

17 A. So I think it says he's got the European Diploma in
18 fire safety, which I would have been aware of. I mean,
19 he — I think he had a range of experience. He clearly
20 had done quite a lot of continuing professional
21 development. I would have questioned him on the NEBOSH
22 because it's a little bit vague, and I know that you're
23 looking at diplomas and certificates really to use
24 NEBOSH, unless you have just done a managing safely
25 qualification.

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1 But he seemed to — it seemed to be a balance of
2 technical issues, fire safety and kind of — I think
3 obviously we then talked to him about fire risk
4 assessments specifically. So it — that, plus the fact
5 that he had eight years as a fire safety officer,
6 I think we were ... we thought was good.

7 Q. Right. I mean, is there any particular qualification
8 that stands out in that list that you thought
9 particularly marked him out as having first-rate
10 quality?

11 A. I think I would have asked him about the national
12 occupational standards. I mean, there are some that
13 I wouldn't know a lot about, so I would have asked him
14 questions and then I would have gone away and done my
15 own research.

16 Q. Okay.

17 Now, do you remember that Carl Stokes also sent you
18 a sample fire risk assessment as part of his tender?

19 A. Yeah.

20 Q. Yes. {TMO00880584}. Do you remember whether you got
21 this document before the interview or afterwards?

22 A. I've no idea, sorry.

23 Q. Did you get it before you appointed him or afterwards?

24 A. I would have assumed that I got all of the documentation
25 from all of the tenderers before.

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1 Q. Yes. Do you remember whether you and the panel looked
2 at this document?
3 A. We would have done, yes.
4 Q. If we go to page 5 {TMO00880584/5}, we can see what he
5 says in a paragraph under the heading "Assessment
6 completed by", and then there is a chunk of text,
7 six lines in all, in bold. Do you see that?
8 A. Yes.
9 Q. It starts, "Mr C Stokes, ACIArb", et cetera.
10 Now, you will know, I think, that this statement was
11 repeated almost identically across all of his fire risk
12 assessments he ever did for the TMO, updating it only by
13 the number of years as an independent fire risk
14 assessor. That's correct, isn't it?
15 A. Yeah.
16 Q. Yes.
17 Do you recall whether you and the panel considered
18 the list of qualifications he set out here in this
19 document?
20 A. Erm ... I don't think we did.
21 Q. You don't think you did?
22 A. No.
23 Q. So do we take it from that that it didn't assist you in
24 making the decision that Carl Stokes had the right
25 qualifications, competence and experience to carry out

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1 the FRAs as part of the medium-term(sic) programme?
2 A. Sorry, I really can't recall whether we looked at both
3 or whether we looked at just one.
4 Q. Right.
5 A. Sorry.
6 MR MILLETT: Mr Chairman, it may be a convenient moment to
7 take the break now. In the light of that, I can perhaps
8 shorten the next run of questions.
9 SIR MARTIN MOORE-BICK: Yes. Well, if that's convenient to
10 you, I'm sure it would be convenient to Ms Wray as well.
11 So, Ms Wray, we will take the afternoon break now.
12 We'll come back, please, at 3.30. And again, please
13 don't talk to anyone about your evidence while you're
14 out of the room. All right?
15 THE WITNESS: Thank you.
16 SIR MARTIN MOORE-BICK: Thank you very much.
17 (Pause)
18 Thank you, 3.30.
19 (3.13 pm)
20 (A short break)
21 (3.30 pm)
22 SIR MARTIN MOORE-BICK: All right, Ms Wray, ready to carry
23 on?
24 THE WITNESS: Yes.
25 SIR MARTIN MOORE-BICK: Now, before you do, I'm going to

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1 take it upon myself to ask you perhaps just to slow down
2 a little bit.
3 THE WITNESS: Sorry.
4 SIR MARTIN MOORE-BICK: And I'm going to ask Mr Millett
5 perhaps to pause a little more between the witness's
6 answer and the next question.
7 MR MILLETT: Yes, Mr Chairman.
8 SIR MARTIN MOORE-BICK: When you're ready, thank you.
9 MR MILLETT: I am.
10 Ms Wray --
11 A. Yes.
12 Q. -- you said in an answer just before the break that,
13 after the interview, you went away and did your own
14 research.
15 Can you remember what research you did on Mr Stokes'
16 qualifications?
17 A. It probably would have been more about researching the
18 qualifications that he'd identified that I was perhaps
19 not familiar with, to learn the extent of what that
20 meant, so that I had a full picture of what his
21 experience and his training was.
22 Q. Now, Dr Lane and Colin Todd both agree that some of the
23 qualifications identified by Mr Stokes in the list that
24 was on the screen in front of us did not exist. Was
25 that something you discovered from your independent

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1 researches, do you think?
2 A. Not the ones I looked at, no.
3 Q. Would you be surprised or are you surprised when I tell
4 you that some of the qualifications for which Mr Stokes
5 made claim did not exist?
6 A. I'd be surprised. I know he sort of portrayed them as
7 if they were post-nominals and I knew that they weren't
8 post-nominals, I always treated them as if they were CPD
9 that you couldn't necessarily use in that way.
10 Q. Can we go to your first witness statement, please, at
11 page 31 {TMO00000890/31}, paragraph 139. You say there:
12 "Throughout the entirety of our working relationship
13 I never had any concerns regarding Carl Stokes'
14 competence. I was aware that he elected not to be on
15 many of the professional registers, however when
16 I raised this with him he assured me that he did not
17 feel he would gain anything from these memberships."
18 When did you become aware that he had not elected to
19 be on many of the professional registers?
20 A. I think that, as years went by, there was -- there were
21 a number of accreditations which started to come
22 onstream, meaningful accreditations for fire risk
23 assessors, whereas prior to that I'm not sure that there
24 was much store by some of the things that existed, and
25 so I -- as I became aware of those, I would have

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1 probably — I would have spoken to him about them, had
 2 he ever considered being IFE or whatever.
 3 Q. And what did he say?
 4 A. As I said here, he was — I think he was a bit cynical
 5 and sometimes thought that, actually, what would he get
 6 back? You pay an amount but actually what do you get
 7 back?
 8 Q. Right.
 9 A. By then we'd obviously been using him for some
 10 considerable time and we were generally happy with his
 11 work.
 12 Q. Now, you say here that you were aware that he elected
 13 not to be on many of the professional registers. That
 14 tends to suggest that you thought he was at least on
 15 some professional registers. Is that right?
 16 A. No, I — that's probably an error on my part.
 17 Q. Right. Did you know that he was on no professional
 18 registers?
 19 A. Yes, I must have done.
 20 Q. You knew that?
 21 A. Yes.
 22 Q. Were you ever aware of a guidance document published by
 23 the Fire Risk Assessment Competency Council called
 24 "A Guide to Choosing a Competent Fire Risk Assessor"?
 25 A. Yes.

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1 Q. Can I ask you to look at it, please. It's at
 2 {HOM00025548}. This is the first version of this
 3 document published on 1 February 2013.
 4 Were you aware that the guidance, which starts on
 5 page 3 {HOM00025548/3}, if we look at that, said in the
 6 second paragraph:
 7 "No matter who carries out the fire risk assessment
 8 the duty holder retains the responsibility for ensuring
 9 the adequacy of that assessment."
 10 Were you aware of that?
 11 A. Yes.
 12 Q. Yes. Just continuing with the text:
 13 "If employing a specialist to undertake your fire
 14 risk assessment, whilst you are not expected to be
 15 an expert in fire safety, you should make reasonable
 16 checks to ensure that they are competent to do the job
 17 properly.
 18 "There are some simple steps and precautions you can
 19 take to help verify the competence and suitability of
 20 a prospective fire risk assessor:
 21 "■ Be satisfied that the fire risk assessor
 22 providing this service is competent to do so. We
 23 recommend you check that those providing this service
 24 have independent registration with, or certification
 25 from, a professional or certification body and that they

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1 meet the competency criteria established by the Fire
 2 Risk Assessment Competency Council (see list below)."
 3 Did you look at this document at the time, do you
 4 think, early 2013?
 5 A. Possibly.
 6 Q. Right.
 7 When you did, if you possibly did, were you
 8 concerned that Carl Stokes might not hold independent
 9 registration with or certification from a professional
 10 or certification body?
 11 A. I think it's too strong to say concerned. I was aware.
 12 I discussed it with him. But, if I'm honest, I'm not
 13 sure I encouraged — I would have preferred him to
 14 register, but I felt it was his personal choice.
 15 Q. Well, you say it was his personal choice; here is
 16 a guidance recommendation for you to check that he is
 17 independently registered with or certified by
 18 a professional or certification body.
 19 A. And if we'd been — sorry. I'm not sure if I'm cutting
 20 across you.
 21 Q. Well, my having shown you that text, my question is
 22 really why you say it was his personal choice. It was
 23 your choice, wasn't it, whether or not you had a fire
 24 risk assessor who met those qualifications?
 25 A. If we'd been procuring a fire risk assessor from that

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1 point onwards, then I completely take on board that's
 2 what we would have required. Because he was someone
 3 we'd already engaged who had demonstrated his
 4 competence, I didn't interpret this as meaning that he
 5 therefore had to go and get it. I interpreted this as
 6 meaning when I'm acquiring a fire risk assessor, this is
 7 what I need to do going forward.
 8 Q. I see. So does it come to this: had this document been
 9 in circulation in 2010, you would have looked a lot more
 10 closely at the fact that Mr Stokes did not have
 11 registration with or certification from a professional
 12 or certification body, but given that he had already
 13 been in harness, as it were, for two and a half years by
 14 this time, you didn't?
 15 A. Yeah, that's basically it.
 16 Q. Right.
 17 A. As I said, the accreditations improved as the years went
 18 by and were much more reputable and reliable. I think
 19 some of the early fire risk assessment accreditations
 20 weren't really — didn't hold a lot of water.
 21 Q. Were you aware that while he was at Salvus, his work was
 22 peer reviewed?
 23 A. Yes.
 24 Q. Often quite a number of times. We have a version 8,
 25 I think, of one of his documents.

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1 A. Okay.
 2 Q. From October 2010, when you took him on as your
 3 medium-risk programme fire risk assessor, he had only
 4 been an independent fire risk assessor for a year,
 5 hadn't he?
 6 A. Yes.
 7 Q. And at that time, he had been under the supervision of
 8 senior, experienced people at Salvus; yes?
 9 A. Yes.
 10 Q. Yes. As a result of that, when he came to you as
 11 an independent, sole practitioner, were you concerned
 12 that his work for the TMO would be unsupervised?
 13 A. I wasn't. I think it's fair to say that the fact that
 14 he'd been recruited, whatever his capacity was, whether
 15 he was employed or sub-consulted, he had been recruited
 16 by Salvus, he had been one of the principal people they
 17 had used on our contract, it was high — potentially
 18 high-risk residential accommodation, so very important,
 19 the first time that Salvus had been our client, so
 20 I think it gave me faith that he had been used by that
 21 company in that way and that they would have mutually
 22 both learned quite a lot from each other, and if Salvus
 23 were unhappy with him, they wouldn't have let him
 24 continue to carry out the assessments on our high-risk
 25 properties.

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1 Q. Yes. But do you understand that there's all the
 2 difference between letting him carry out assessments on
 3 your high-risk properties under supervision and
 4 peer review on the one hand, and him performing the same
 5 function for the TMO without anybody in a position to
 6 supervise him or peer review his work?
 7 A. I do understand that. I mean, Salvus were very
 8 exacting, and I do think that if they had been unhappy
 9 with his performance, regardless of how many revisions,
 10 they would not have let him continue on the contract.
 11 So I did get faith in the fact that he had continued.
 12 I thought that was an important factor. He was now
 13 familiar with quite a lot of our buildings, and he —
 14 and everything that he had done appeared to meet the
 15 requirements of the Fire Brigade as well.
 16 Q. Why did you take on Carl Stokes, a fire risk assessor
 17 who would have no peer review and no supervision by
 18 anybody senior to him, of all those who were applying
 19 for the post?
 20 A. I think he just — he seemed very — he seemed to have
 21 good experience, he seemed to be extremely
 22 knowledgeable. He understood the fire and rescue
 23 service, their procedures, what they had to do, how they
 24 did their auditing, all of that knowledge that we didn't
 25 have that would be really helpful. He had already

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1 familiarity with the overwhelming majority of our
 2 high-rise blocks. We were moving down to medium-risk,
 3 where there would be a lot less maintenance, a lot less
 4 AOVs and suchlike it, so it felt like less of a risk.
 5 But also, he did do the best interview. He did —
 6 we were all — the three of us unanimously felt that he
 7 was the best candidate on the day.
 8 Q. Did you ask him the question: who will be peer reviewing
 9 your work?
 10 A. No, I can't have done, no.
 11 Q. Was it not a consideration when you were making the
 12 selection that there would be nobody there to supervise
 13 or peer review his work?
 14 A. At that time, the Brigade were still very heavily
 15 involved in scrutinising what we were doing, so I didn't
 16 feel it was a risk because I felt that any potential
 17 issue would be flagged up very definitely and very
 18 loudly, and quite quickly. And we continued to share
 19 his assessments with the Brigade on a regular basis,
 20 and, you know, in truth, I didn't always agree with some
 21 of the things that he said, and I told him when I didn't
 22 agree, so we had a fairly robust relationship. But, no,
 23 at the time we felt he was the right appointment.
 24 Q. You see, there is a difference, isn't there, between
 25 relying on the LFB to pick you up robustly on the one

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1 hand, and Mr Stokes carrying out his responsibilities
 2 for you as FRA on the other?
 3 A. Of course.
 4 Q. Yes. I mean, on the one hand Mr Stokes is ensuring that
 5 you, the TMO, and you particularly as the competent
 6 person within the TMO, comply with their statutory
 7 obligations under the RRO; whereas the LFB is the
 8 enforcing authority.
 9 A. Indeed, I'm well aware of that. I was merely saying
 10 that that was an additional factor that we thought was
 11 actually a positive thing, that the level of scrutiny
 12 was an advantage, that any deviation from the suitable
 13 and sufficiency was likely to be flagged up quite loudly
 14 and quite quickly.
 15 Q. Yes, but that's not a very reasonable and sensible
 16 approach, is it, to rely on the enforcing authority to
 17 pick you up where you go wrong in breaching the statute?
 18 A. No, and the point I'm making is I wasn't relying on it,
 19 I was just saying that it was an additional thing that
 20 we knew was in place.
 21 Q. Now, it's right, I think, that Mr Stokes signed
 22 an acceptance of a fee tender on 21 October 2010.
 23 That's the date we have in your second witness statement
 24 at paragraph 13 {TMO00842341/3}; yes?
 25 A. Yes. Sorry, I don't have all the dates in my head.

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1 Q. I can show you that if you want to, but —
 2 A. No, it's fine.
 3 Q. That was for the medium-risk programme, wasn't it?
 4 A. Yes.
 5 Q. So he started work for you on the medium-risk programme
 6 at that time; yes?
 7 A. Yes.
 8 Q. Now, once he was appointed, did you again give
 9 a commitment to the LFB that you would evaluate his
 10 performance, as you had given the LFB in relation to
 11 Salvus when they came on board to do the high-risk
 12 programme in September 2009?
 13 A. Yes, I believe that we did.
 14 MR MILLETT: You did.
 15 SIR MARTIN MOORE-BICK: Sorry, could I just intervene,
 16 before we move away from the point.
 17 Did you ask Mr Stokes about other clients for whom
 18 he had done fire risk assessments? We know he had
 19 worked for Salvus as a subcontractor or at least —
 20 A. Yes.
 21 SIR MARTIN MOORE-BICK: — as an employee or
 22 a subcontractor. But did you ask him who else he had
 23 worked for and on what sort of buildings?
 24 A. I did, and my impression was always that he had a range
 25 of residential housing experience, which is what we were

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1 always looking for. I can't recall the detail of his
 2 clients, and I know that at some stage, although I don't
 3 know if it was that far back or subsequently, he had
 4 a range of insurers he was — he worked for, so that was
 5 all over the place in all sorts of different kinds of
 6 properties.
 7 SIR MARTIN MOORE-BICK: Were the insurers clients or were
 8 they people who were insuring his —
 9 A. No, no, no, they were clients. He was having to go off
 10 all over the country to — I recall him being in
 11 Shetland once when I needed him, that's why it sticks in
 12 my mind.
 13 But, yeah, we definitely would have asked about his
 14 range of experience, because we had specialised housing,
 15 we had temporary accommodation, and, you know, we had
 16 low-risk, and we wanted to be assured that he had the
 17 full range, and I certainly had the impression that he
 18 had.
 19 SIR MARTIN MOORE-BICK: Right, thank you very much.
 20 Sorry, Mr Millett.
 21 MR MILLETT: Did you ask for or take up a client reference
 22 for Mr Stokes?
 23 A. No, I don't believe I did.
 24 Q. On the question of evaluation, did you evaluate his
 25 performance after he had taken on the role of the fire

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1 risk assessor for the medium-risk programme?
 2 A. Yes, I'm sure I would have done. I mean, we had our
 3 progress meeting, we still had RBKC involved. We had —
 4 I believe we still had periodic meetings with the LFB
 5 attending, and I was the one setting him the programme
 6 and I was the one who received all of his fire risk
 7 assessments. So, yes. Yes, would have been —
 8 Q. Against what criteria or objective yardsticks did you
 9 measure his performance as a fire risk assessor from
 10 that time?
 11 A. Obviously we were always looking at his programme to see
 12 whether he was doing what he said he was going to do in
 13 the required timeframe. I — to be honest, I'm probably
 14 going to be really vague about it now. I was
 15 scrutinising, I was scrutinising for consistency. If
 16 there were differences in properties that I thought were
 17 similar then I would challenge him or ask for
 18 explanations. I can't really give you any more detail
 19 at this stage, I'm sorry.
 20 Q. During the currency of the medium-risk programme, at
 21 least in its early years, how many fire risk assessments
 22 did Mr Stokes provide to you a week?
 23 A. I don't know. I don't even know — so there were 110 in
 24 the high-rise ...
 25 Q. High-risk?

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1 A. Sorry, yes, high-risk, apologies. I don't know
 2 whether — I think we had in total about 650 blocks, so
 3 that still left over 500. I don't know if they were
 4 split evenly, whether it was 200, 250, I'm not sure.
 5 I could probably find out if I waded back through, but
 6 I don't know. But often quite a volume, and then other
 7 periods less so, depending on the programme and his
 8 other activities and what fitted with what we needed.
 9 Q. Did you read each and every one?
 10 A. I read every action plan and I read — I endeavoured to
 11 read every fire risk assessment. Depending on the
 12 volume I was receiving depended on how much attention
 13 I was paying, and if I'm honest, if we had four
 14 identical blocks, I would read one rigorously and then
 15 I would — depending on how many I was getting through,
 16 I would not pay the same level of detail to the others,
 17 but I would try to get through all of them.
 18 Q. Did you have a helper to read them?
 19 A. No.
 20 Q. It was all you?
 21 A. It was me.
 22 Q. Yes. Okay.
 23 Now, can we go to your second witness statement,
 24 please, {TMO00842341/4}, paragraph 15. You say there:
 25 "Following completion of the low risk programme,

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1 Carl Stokes Associates was retained by the TMO as its
 2 fire safety consultant on a rolling basis until
 3 June 2017."
 4 Now, the FRA programme for high-risk, medium-risk
 5 and low-risk blocks ended in May 2012, didn't it?
 6 A. Yes, I believe so.
 7 Q. The actual programme; yes?
 8 A. Yes.
 9 Q. Can we then go to {TMO10031056} and look at page 1 of
 10 that document.
 11 This is your report to the operations committee
 12 dated 2 May 2013. You can see in the grey box, the
 13 purpose of the report —
 14 A. Yes.
 15 Q. — which is to appraise the operations committee of the
 16 TMO's current position in relation to fire risk
 17 assessments, and there are a number of things under
 18 paragraph 1.2 that you're asking the operations
 19 committee to note, and I'll just identify those for you
 20 there. In particular, the last one is:
 21 "The recommendations made by the Coroners following
 22 inquest on the Lakanal House fire and the Southampton
 23 fire and response from the Communities & Local
 24 Government to date."
 25 Now, if you go to page 2 {TMO10031056/2}, you can

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1 see under paragraph 3.2 on that page, under the heading
 2 "Progress with FRA Programme", you say:
 3 "All three assessment programmes were completed in
 4 May 2012 a few months in advance of the LFB's July
 5 timescale and such comprehensive FRAs are now available
 6 for every block.
 7 "Comprehensive ('suitable & sufficient') FRAs have
 8 now been completed for each block."
 9 Then you see underneath that paragraph 4.0,
 10 "Approach to reviewing FRAs", and you say this:
 11 "4.1 FRAs are living documents which cannot remain
 12 valid for an unlimited length of time. Therefore, to
 13 ensure ongoing compliance with the legislation
 14 assessments need to be reviewed and/or re-assessed
 15 periodically.
 16 "4.2 With regard to how frequently FRAs are reviewed
 17 the TMO have adopted the criteria set out in the current
 18 best practice guidance on fire safety in residential
 19 accommodation — 'Fire safety in purpose-built blocks of
 20 flats' produced by the Local Government Group (published
 21 in July 2011).
 22 "4.3 Specifically, FRA reviews will be undertaken in
 23 the following circumstances —
 24 " ■ regularly,
 25 " ■ following 'material alterations' at the block,

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1 " ■ when there is a significant change in the matters
 2 that were taken into account as the risk assessment was
 3 carried out (such as a widespread change in the type of
 4 residents occupying the block),
 5 " ■ when there is a reason to suspect that the
 6 original FRA is no longer valid (eg after a fire that
 7 occurred within, or spread to, the common parts) AND.
 8 " ■ following completion of significant works
 9 instigated to address shortcomings identified by the
 10 FRA.
 11 "4.4 Depending upon their complexity these FRA
 12 Reviews are being carried by either the TMO Health &
 13 Safety Team or the Fire Consultant.
 14 "4.5 FRAs are being progressed according to the
 15 criteria above and the programme progresses on
 16 schedule."
 17 Now, after the FRA programme was completed, it's
 18 right, isn't it, that in and after 2013, you implemented
 19 a programme of FRA reviews?
 20 A. Yeah.
 21 Q. Is that right?
 22 A. I can't remember when we implemented them before then,
 23 but yeah, we were doing low-level reviews in-house which
 24 was really just in between the adjacent comprehensive
 25 reviews. It was a sort of spot check in between where

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1 there had been no material alterations. It was a way of
 2 checking that the actions which had been identified were
 3 being progressed.
 4 Q. Yes.
 5 A. And my colleague was doing that as part of his regular
 6 visits to blocks. If he identified that there were
 7 works going on at the block that we hadn't been made
 8 aware of, that changed the priority and that changed the
 9 nature of the FRA. Then that would go up into the
 10 programme and be —
 11 Q. Were these reviews that you refer to in paragraph 4.4
 12 here being carried out before 2 May 2013?
 13 A. Yeah, I believe so.
 14 Q. You say there that they are being conducted either by
 15 the TMO health and safety team or the fire consultant,
 16 who was Carl Stokes.
 17 A. Yes.
 18 Q. Did the TMO health and safety team carry out any reviews
 19 or was that all left to Carl Stokes in all cases?
 20 A. No, actually, we mostly did the low-level reviews
 21 ourselves because we could readily access the ordering
 22 system to see where repairs had been ordered and it was
 23 easier for us to chase up.
 24 Q. When you say "we", who was —
 25 A. Well, actually, Adrian, my colleague, was doing that.

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1 Q. Adrian Bowman, was it?
 2 A. Yes.
 3 Q. I see.
 4 In the case of those reviews, how did you decide
 5 which reviews were, as you call it, low level?
 6 A. Erm —
 7 Q. What do you mean by low level? Do you mean low risk?
 8 A. No, I think what I mean by low-level review is you've
 9 got your comprehensive assessment, usually, depending on
 10 the risk rating of the block, either 12 months or
 11 18 months later, you would want to do a low-level
 12 review, so you would want to go visually assess the
 13 block, check that the items that have been identified
 14 have been completed, if they haven't, chase them up and
 15 give somebody a load of grief for why they've not been,
 16 and — yeah, so that's what we mean by low level. It's
 17 done in-house, really about checking that nothing has
 18 changed which has changed the priority of when the next
 19 assessment will be undertaken and that the things that
 20 have been identified are being progressed.
 21 Q. I see. So the review was not a review of the quality of
 22 Mr Stokes' work —
 23 A. No.
 24 Q. — it was a review of the progress in closing out FRA
 25 actions?

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1 A. Yes.
 2 Q. I see.
 3 You mention Adrian Bowman. What training did
 4 Adrian Bowman have in respect of fire safety matters?
 5 A. He's got an, IOSH certificate. He does — he did a fair
 6 bit of CPD. It was the same thing, we would check what
 7 was the most appropriate fire safety training for him to
 8 be doing. I can't tell you off the top of my head, but
 9 he would have brushed up on quite a lot of his skills.
 10 He would have sometimes done some joint stuff with Carl
 11 if he wanted to — if they wanted to have a discussion
 12 about specific aspects of fire safety, and sometimes it
 13 was better practical.
 14 He also organised the fire safety training that the
 15 estate staff and fire marshals, et cetera, attended. So
 16 he was often in dialogue with that person about tweaking
 17 that course and making it more appropriate.
 18 Q. Did Mr Bowman have any familiarity with or training on
 19 the LGA guide or PAS 79, which was by now in force?
 20 A. Yes. Yes, almost definitely the LGA guide. I can't
 21 recall whether he has PAS 79.
 22 Q. Now, we know that Carl Stokes carried out his first
 23 independent fire risk assessment on Grenfell Tower on
 24 29 December 2010.
 25 A. Yes.

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1 Q. We have that, just for reference purposes, at
 2 {CST00003181}.
 3 Had you begun this programme of reviews of FRAs
 4 after the conclusion of the high-risk programme in
 5 May 2010 or did that all wait until May 2013 or
 6 thereabouts?
 7 A. Okay. So what I recall is we took on Carl to do the
 8 medium-risk FRAs and then I, probably naively, realised
 9 that the high-risk FRAs had all stated that they should
 10 be reviewed within 12 months, and at that time my
 11 colleague hadn't had sufficient appropriate training.
 12 So at that time, I am confident I would have checked
 13 with my line manager and possibly with RBKC to say: can
 14 we ask Carl to review the high-risk FRAs which are now
 15 coming up for review?
 16 Q. I see. To review, to check whether the action items had
 17 been carried out?
 18 A. No, in this case it wouldn't have been as low-level
 19 a review. Because the assessor was doing it, he
 20 would —
 21 Q. Right.
 22 A. — do it to a high standard.
 23 Q. Was it for Carl Stokes to carry out those reviews even
 24 though he had not done the original FRA, because they
 25 were on the high-risk programme?

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1 A. Erm ... in this case, it was for him to do. We
 2 subsequently introduced the situation that I've
 3 explained to you about my colleague. But in this case
 4 we asked him to do them.
 5 Q. Right. So Carl Stokes carried out reviews in relation
 6 to high-risk where he hadn't done the FRAs —
 7 A. At that point in time, yes.
 8 Q. Yes, I see.
 9 Was that ever explained to the operations committee?
 10 A. I don't think the operations committee was in existence
 11 at that time. Oh, sorry, you mean the high-level one.
 12 Actually, I'm sorry, I can't recall.
 13 Q. Right.
 14 You didn't re-tender the high-risk FRA contract, did
 15 you?
 16 A. No, we didn't, and I wouldn't have just instructed him
 17 to do high-risk FRAs when he'd been appointed for medium
 18 without taking advice from procurement colleagues and my
 19 line manager, and possibly also RBKC, but I don't seem
 20 to be able to evidence that, which is a bit frustrating.
 21 Q. Well, it may be, but do your best with your
 22 recollection. Why didn't you re-tender the high-risk
 23 FRA contract?
 24 A. It was just time, really. So we were gearing up for the
 25 medium-risk, the medium-risk starts and then I kind of

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1 realised that actually, because the high-risk started
 2 September the previous year, some of those now had
 3 a 12-month review period, so we needed to very quickly
 4 get on and do the high-risk, and that just --
 5 procurement is slow and arduous, and it seemed that if
 6 my procurement colleagues were happy for us to proceed
 7 by instructing Carl to do them, that's what we would do.
 8 Q. I see. So you said before that it wasn't on your radar;
 9 was it as a result of it not being on your radar that
 10 you ran out of time and then found yourself in a pickle?
 11 A. Pretty much, unfortunately, yeah.
 12 Q. And that explains, does it, why there was no recruitment
 13 or selection process for who was going to do high-risk
 14 reviews after the first programme?
 15 A. It does, but again, I would reiterate, I wouldn't have
 16 made those decisions without getting procurement
 17 colleagues to be very clear.
 18 Q. Yes.
 19 Did you discuss the non-procurement of Carl Stokes,
 20 as it were, for the high-risk programme with anybody at
 21 the TMO?
 22 A. Again. Sorry, when I said procurement colleagues,
 23 procurement colleagues internally in the TMO,
 24 Lornette Pemberton, my line manager --
 25 Q. Right, Lornette Pemberton then?

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1 A. Yes.
 2 Q. What about anybody at RBKC?
 3 A. I'm sure, although I can't specifically remember,
 4 I would have contacted Ann Muchmore, because she was my
 5 link person at the time, and if necessary I would have
 6 escalated it within the housing team if that was her
 7 advice.
 8 Q. And who would that have been to?
 9 A. Then I think -- I don't know if it was still
 10 Pam Sedgwick or Amanda, or perhaps to Laura. I can't
 11 recall.
 12 Q. At that stage I think it was probably Pam Sedgwick.
 13 A. Okay. Whatever she advised, I would have --
 14 Q. Right.
 15 Is it right that Carl Stokes simply took over
 16 responsibility for that contract, it renewed to him
 17 essentially?
 18 A. Well, that wasn't the intention. Ultimately that's what
 19 it ended up becoming, but that wasn't the original
 20 intention.
 21 Q. Did you get approval for that approach from either the
 22 TMO executive board or RBKC?
 23 A. I can't recall, I can only reiterate I discussed it with
 24 Lornette and colleagues in the TMO procurement team and
 25 colleagues at RBKC, and I would have done whatever they

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1 required me to do, but I don't remember whether that was
 2 requested.
 3 Q. Do you know how the funding for Carl Stokes' work on the
 4 high-risk properties was approved?
 5 A. I don't.
 6 Q. Right.
 7 Now, it's right, I think, that you didn't enter
 8 a written contract with Carl Stokes for him to carry out
 9 high-risk FRAs, did you?
 10 A. No.
 11 Q. Why is that?
 12 A. Again, I can only say that if I'd been instructed to do
 13 it, I would have done it, because we had a history of
 14 doing what procurement advised.
 15 Q. Right.
 16 It's also right, isn't it, that after the
 17 medium-risk and low-risk FRA programmes came to an end,
 18 you didn't enter into a fresh contract with him for
 19 those programmes?
 20 A. No, we didn't. Again, I would have taken advice, but
 21 again, I don't know where I put it or what I've done
 22 with it. I wouldn't make those decisions and I don't
 23 usually have much budgetary control, so I'm always
 24 really careful about making sure that I follow the
 25 rules.

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1 Q. No, but the factual position seems to be that there was
 2 a formal contract for the high-risk programme with
 3 Salvus, that came to an end, and a formal contract
 4 through a tender for the medium-risk programme with
 5 Carl Stokes, and then it all just rolled into one
 6 ongoing understanding after that, undocumented and
 7 non-contractual.
 8 A. Well, he was still operating to the contract, the terms
 9 of the contract. The low-risk I did take advice and
 10 there is a document which I was told Sacha needed to
 11 sign and Carl needed to sign and that that's what I was
 12 required to do, which is just one sheet of paper, but
 13 that's the advice that I received and we did have that
 14 in place. But, yeah, he was always -- whatever he was
 15 doing, he always was operating according to the original
 16 contract, that was always his understanding.
 17 Q. Yes. When I say non-contractual, I mean no fresh formal
 18 contract signed --
 19 A. No, you're right.
 20 Q. -- to govern specifically that role. But your
 21 understanding, and indeed his, was that you always
 22 operated together on the basis of the terms and
 23 conditions contained in the July 2010 consultants'
 24 report for all properties?
 25 A. Yes.

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1 Q. Yes.

2 Was his continued instruction on that basis ever
3 approved by anybody at the TMO?

4 A. No. I'd have discussed it with Barbara probably within
5 maybe the first six months or a year of her joining, and
6 I said, you know, "This is the situation, I think this
7 needs to be looked at, and I think perhaps we're in
8 a position where we now need to re-procure". And we
9 were both mindful of the fact that Carl just — he
10 didn't just undertake risk assessments, that he was able
11 to offer us kind of advice and assistance, he'd assessed
12 leaseholder doors, so there was a range of other
13 activities that he was — had undertaken on our
14 instruction, so we had done some work to identify, get
15 together a sort of comprehensive list of those. So,
16 you know, in some cases he would assist with training,
17 there were a variety of things.

18 And I had spoken to and I did find some
19 documentation — Ernest Raw was one of my procurement
20 colleagues and I started to have discussions with him
21 and set out the extent of the work, but I don't know
22 where that had got to, to be honest, but we had
23 certainly kicked it off and Barbara was aware that we
24 needed to get on and do some re-procurement.

25 Q. Are you able to explain how it comes about that there

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1 was no formal contract with Carl Stokes for any of these
2 programmes after 2012 in circumstances where the TMO was
3 a pretty document-heavy organisation which liked to
4 write everything down, so it seems?

5 A. I can't. I can only reiterate that I would have taken
6 advice. There is no way that we would have let that
7 continue unless I'd been advised that that was okay.

8 Q. How was his funding arranged? Let me put it a slightly
9 different way: did anybody approve the funding for
10 Carl Stokes' work?

11 A. I don't actually know. I mean, his invoices came in,
12 I was the one that checked that what he said he'd done
13 was what he'd actually done, and I signed them off and
14 gave them to finance, and I truthfully don't know how it
15 was budgeted.

16 Q. You don't know how it was budgeted?

17 A. No.

18 Q. Okay.

19 Can we go to your first witness statement, please,
20 page 31 {TMO00000890/31}, paragraph 140. You say there
21 in the third line, after having referred to the initial
22 position with Mr Stoke:

23 "However, his role changed over time and the default
24 position became that if we had an issue that might be
25 classified as a fire safety risk, more often than not we

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1 consulted CSA [Carl Stokes Associates]."

2 Now, when you say that you would consult with CSA
3 for any issue that "might be classified as a fire safety
4 risk", what did you mean by that?

5 A. I mean that, for example, he got involved in assessing
6 potentially non-compliant leaseholder doors. We
7 originally — I know it's quite a big area, but we had
8 originally endeavoured to explain to leaseholders that
9 the door was demised and was their responsibility.

10 Q. Can I just pause there?

11 A. Sorry.

12 Q. You may have misunderstood my question.

13 A. Sorry.

14 Q. How would you create a class which would contain things
15 like fire safety risks? What was the classification you
16 used?

17 A. When things were referred to me — it was a range of
18 things. It could be people with hoarding tendencies
19 where there is an elevated potential degree of risk, it
20 could be things to do with mobility scooters, it could
21 be very vulnerable residents. There were a variety of
22 things. Anything that was referred to me that I felt
23 I wanted to get a second opinion on from a specialist
24 fire consultant, I would consider referring to Carl.

25 Q. I see.

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1 Was this approach or process approved by the TMO
2 board at any time?

3 A. Certainly in relation to the leaseholder doors, that was
4 approved by the health and safety committee, and I think
5 also the scrutiny committee.

6 Q. But this ad hoc approach in general of going to
7 Carl Stokes whenever a so-called or potential
8 fire safety risk arose, was that ever the subject of
9 approval by the TMO board?

10 A. No, not explicitly. I think there was always
11 an expectation that there would be things — and the
12 same with Salvus, there would be things that came along
13 that we would seek his advice on, because we didn't have
14 sufficient detailed in-house fire safety advice and that
15 was part of the contract, really.

16 Q. Given that the TMO board was the board of the
17 responsible person, was it not essential for the TMO
18 board to know of and approve of those ad hoc
19 arrangements?

20 A. Possibly. Well, I mean, all I can say is my line
21 managers always knew the range of activities we — and
22 sometimes it would be them who suggested we get him
23 involved in assessing or doing an activity-specific
24 report, and there was nothing coming back from executive
25 team to say, "Actually, we should set out the terms of

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1 this".

2 Q. Did it ever occur to you to tell your line manager that

3 the ad hoc arrangements that you had with Carl Stokes

4 ought to be formally brought to the attention of the TMO

5 board as the board of the responsible person and

6 signed off?

7 A. I don't believe it did.

8 Q. Why is that?

9 A. I can't give you an explanation. It should have done.

10 I think the problem is sometimes whenever you have

11 a really busy day job, you don't stand back and do the

12 kind of thinking about, well, actually that's the

13 structure that you need to have in place. I can't give

14 you an explanation.

15 Q. What about RBKC? To your knowledge, did RBKC ever

16 sign off on Carl Stokes' ad hoc approach?

17 A. I don't believe they signed off on it, no, but I think

18 they certainly were aware of his involvement,

19 significant involvement in terms of leaseholder doors,

20 because we also had some joint meetings with quite

21 senior people at the Fire Brigade and Carl and

22 colleagues from RBKC were in attendance, so they were

23 aware.

24 Q. Now, I want to turn to the instructions given to

25 Carl Stokes for completing the FRAs.

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1 Am I right in thinking that those were always

2 contained in or could be found in the July 2010

3 consultants' brief that you had sent him as part of the

4 tender for the medium-risk programme?

5 A. Yes.

6 Q. Yes.

7 A. I believe so.

8 Q. And once Mr Stokes had been taken on by the TMO for the

9 low-risk FRA programme, were those instructions ever

10 supplemented by any other written instructions?

11 A. I don't recall them being, no.

12 Q. And what about when he was instructed on a rolling basis

13 at the end of the low-risk programme, was he ever given

14 any supplemental instructions, or he just carried on?

15 A. Not that I recall.

16 Q. Right.

17 A. Sorry.

18 Q. So what were his instructions once he was carrying all

19 three programmes on a rolling basis?

20 A. I would give him a programme with timescales for when

21 things were due to be reviewed. He would come back and

22 confirm that he could meet that. I would start —

23 you know, he knew the properties quite well by then, he

24 knew the local caretakers, he could often — he had

25 drop keys, so he could sometimes get his own access, he

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1 had their contact details, so those are the kinds of

2 additional things that we were providing with him and

3 updating him on, on a regular basis, but I don't really

4 think about those as formal instructions, but we would

5 be providing regular information.

6 He would undertake — I believe what — so when he

7 first came to work for us, I introduced him to

8 colleagues in what was then I think building services

9 but became contract management. He would often go

10 straight to them to ask them for documentation and

11 certification in relation to planned maintenance,

12 because he knew if he came through me, that was just

13 an added tier of people, it made sense just to go

14 straight to them. He would often pop in and collect the

15 documentation. Providing he had the documentation

16 before he went to site, then that would all be referred

17 to in his assessment.

18 He had a set of Gerda keys, so he could get into

19 all — generally all the areas of the building. If

20 there were areas that he couldn't access, he would

21 initially try and contact the caretaker, the ESA, to

22 provide access or he would make sure they were outlined

23 in his report.

24 At the conclusion of that, when his report was

25 finalised, I would receive it as a pdf document, and

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1 then I would receive a Word document with the action

2 plan and significant findings.

3 Q. Right.

4 Now, when the LGA guidance was published in 2011 and

5 when the PAS 79 guidance document was revised and

6 published in August 2012, at either of those points or

7 after either of those points, did you ever send any

8 instructions to Carl Stokes just to bring him up to date

9 with the new publications and ensure by way of

10 instruction that he complied with those?

11 A. We would have discussed them at length, particularly the

12 LGA guide.

13 Q. Right.

14 A. Because we had both been involved in the consultation

15 that led up to it being finalised, he had his own input

16 and I think he also input some responses on our behalf,

17 so we were both mindful that it was coming and we were

18 quite looking forward to it, because we hoped it would

19 be the most appropriate documentation for the majority

20 of our blocks. So we would have talked at length about

21 the LGA guide. But whether that translated into written

22 instructions for him, I'm not sure.

23 Q. Now, what about PAS 79, August 2012 edition, did you

24 ever have a conversation about that document?

25 A. Probably, but I can't specifically remember, apologies.

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1 Q. Right.
 2 I want to ask you some questions about the process
 3 and frequency of the production of FRAs.
 4 Can we go to the consultants' brief, please, at
 5 {TMO00842371/6}, part 2, paragraph 1.1, "Scope", and it
 6 says:
 7 "Fire Risk Assessments will be undertaken and
 8 reviewed regularly at a frequency dictated by the degree
 9 of risk. The FRA and FRA reviews will include an
 10 individual examination of each communal fire door
 11 including whether it operates correctly and the findings
 12 will be clearly documented in each report."
 13 Do you recall how often high-risk buildings were
 14 reviewed once the initial programme with Salvus was
 15 completed in April 2010?
 16 A. They would have been done by Carl. As you know,
 17 Grenfell Tower was done at I think December 2010, so
 18 the ... I think the plan was that they would be done
 19 comprehensively every three years unless there were
 20 material alterations or the other factors, and there
 21 would be a low-level review happening in between those
 22 periods.
 23 Q. Yes.
 24 A. In reality, because we had Manse Masterdor replacing
 25 doors and we had some major works in various locations,

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1 there were other factors which meant that reviews were
 2 undertaken at shorter intervals, more frequently.
 3 Q. Yes.
 4 You mentioned Grenfell Tower, December 2010. That's
 5 quite right, 29 December 2010. Do you know why
 6 Carl Stokes produced an FRA in December 2010 for
 7 Grenfell Tower when he had produced one when at Salvus
 8 on 30 September 2009?
 9 A. I think that's what we referred to, that that sort of
 10 snuck up on me, really, that we'd appointed him to do
 11 medium-risk, he is getting on with the medium-risk and
 12 then I have a kind of crisis moment and go away and say
 13 to my colleagues in procurement and my line manager,
 14 "I'm in this position, I want us to do another
 15 comprehensive review by the consultant. Is this
 16 something that we can get on and do?" And then he is in
 17 a position where he has to programme that in along with
 18 all of his other work.
 19 Q. Right.
 20 What Mr Stokes says in his statement — and this is
 21 paragraph 52 on page 17 {CST00003063/17}, we don't need
 22 to go to it — is that if he had done an FRA in a given
 23 year for a particular high-risk building, then it was
 24 intended that the FRA would be reviewed in-house by TMO
 25 the next year and then he would undertake a fresh FRA

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1 the year after that.
 2 Do you agree with that?
 3 A. It's right that we would get to the stage where we would
 4 review the FRA in-house the following year, but
 5 I believe at that stage, for high-risk, we were looking
 6 to make sure they were done every three years, because
 7 the proposal in the redrafted fire strategy that didn't
 8 quite make it to be signed off was that we would review
 9 comprehensively every two years, so that was a change.
 10 So I think our original position was once every
 11 three years.
 12 Q. Right. So can you account for why Grenfell Tower, which
 13 was a high-risk building, I think, was redone with
 14 a fresh FRA only in December 2010?
 15 A. Because that's what Salvus specified whenever they did
 16 their review.
 17 Q. Right, I see.
 18 A. Yes.
 19 Q. Now, the concept of in-house reviews is repeated,
 20 I think, in your November 2013 fire safety strategy,
 21 isn't it?
 22 A. Yes.
 23 Q. Let's go to that, {TMO00830598/10}, paragraph 14.3.3.
 24 It says there, halfway through the paragraph:
 25 "It is anticipated that the shorter, more regular

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1 reviews which will tend to concentrate primarily on
 2 progress with previous Action Plan and identification of
 3 any changes, will be carried out in-house by the TMO
 4 Health & Safety Team. However, where completely new
 5 FRAs are required — either because some of criteria
 6 2.—4. apply or on a recurring basis — the services of
 7 a specialist fire risk assessor will be used."
 8 So just to be clear, the regular reviews were not
 9 intended to be like fire risk assessments completed by
 10 Carl Stokes to PAS 79 standards?
 11 A. No.
 12 Q. No.
 13 A. No, they weren't. They were —
 14 Q. They're just monitoring to see —
 15 A. — what we call the low-level review. Apologies.
 16 Q. Yes. They're just monitoring to see that the actions
 17 are closed out?
 18 A. Yes, and there are no obvious changes to the building,
 19 there's no evidence of arson or antisocial behaviour or
 20 any other areas which would lead you to think that
 21 there's an elevated degree of risk, or any works on site
 22 where there might be hot works that we're unaware of,
 23 those kinds of issues.
 24 Q. I see.
 25 Now, Carl Stokes said in his evidence — and, just

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1 for our purposes, it's {Day136/148:12–16}, and we can
 2 see it if you like — he would receive copies of
 3 something he called a health and safety tick—sheet. Can
 4 you help me with that?
 5 A. No.
 6 Q. What was that? You don't know?
 7 A. I really don't know, sorry. Because my colleague, when
 8 he was doing his reviews, would take out Carl's action
 9 plan and we would add another column just to confirm
 10 that what we thought had been completed was completed,
 11 so that we had a record, and Carl wouldn't necessarily
 12 have that, and after that was done and we moved on to
 13 the next FRA, I'm not sure we would have necessarily
 14 kept it. So I don't think we'd have shared that with
 15 him, and it wasn't a tick—sheet.
 16 Q. Well, that leads to the next question.
 17 A. Oh, right. Sorry.
 18 Q. Did you send him the FRA action plans with that fourth
 19 column completed in them for his next FRA?
 20 A. I don't recall that we did. We could have done, but
 21 I don't recall that we did or that he requested them,
 22 because I think he was going to refer back to his
 23 original comprehensive assessment.
 24 Q. Now, going back to the question of scope, can we go back
 25 to the consultants' brief, please, {TMO00842371/6},

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1 paragraph 1.1. I've read you this before, the reference
 2 to communal fire doors.
 3 Can you explain what you expected to be documented
 4 in the report? Was it detail of each communal fire door
 5 or just the fire doors that weren't operating correctly?
 6 A. I expected the action plan and significant findings to
 7 identify anything that we needed to action, so where he
 8 assured me that he did a visual check of all of the
 9 doors in the block, obviously in terms of flat entrance
 10 doors, generally that would be from the outside unless
 11 he managed to get access, but communal doors he would
 12 inspect from both sides, inspect the closer, any strips
 13 or seals or any door furniture, any glazing, all of
 14 that, and he would identify anything that was defective
 15 or potentially non—compliant, and that would be
 16 documented in the action plan, and that would allow us
 17 to raise the appropriate order for the works to be
 18 undertaken.
 19 Q. Right.
 20 Now, this document is July 2010. Can you just help
 21 me, why were communal fire doors in particular singled
 22 out for special treatment in paragraph 1.1 of this
 23 document?
 24 A. I suppose because they protect the means of escape,
 25 especially if there's a dedicated means of escape, often

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1 communal fire doors are there to protect that. I can't
 2 say.
 3 Q. You don't know?
 4 A. No, I don't know. I mean, the difficulty with this
 5 document, as I said before, is that it was put together
 6 involving other colleagues from the council, and I look
 7 at it now and I don't know which bits were put in by
 8 whom, but certainly Alexis did quite a lot of it, and it
 9 may have been from him or me, I'm not sure.
 10 Q. I mean, do you remember any particular problem or
 11 concern arising at the time about communal fire doors
 12 which would have meant that it should obtain such
 13 a special place in this specification of services?
 14 A. No, no, not especially. Obviously they were always
 15 crucial to maintain the means of escape. The caretakers
 16 were doing regular inspections and we thought it was
 17 a very important — and of the communal areas, so
 18 they're an important part of the communal area so it's
 19 important that they're looked at, and in some blocks
 20 they were subject to quite a lot of use and so
 21 potentially they could have failed more often, so we
 22 wanted to be assured that they were being given the
 23 level of scrutiny that they should have had.
 24 Q. Now, can we just go back to your first witness
 25 statement, then, please, still on the question of scope,

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1 and look at paragraph 140 at page 31 {TMO00000890/31}.
 2 You say there three lines up from the bottom:
 3 "Carl's remit was the common areas of properties
 4 only, however he had a helpful nature and would often
 5 make comments on matters outside of this remit."
 6 What did you understand by the phrase "common
 7 areas"?
 8 A. I suppose — well, I suppose; I understood it to be the
 9 communal areas, the areas which were sort of authorised
 10 access only, so the plant areas, and obviously the
 11 specification — his documentation requires him to do
 12 a percentage of inspections of flat entrance doors. So
 13 he'll do all of the doors from the outside of the
 14 property, but he needed to try and gain access to
 15 a number of flat entrance doors so that we knew what
 16 they were like from the inside and he could make
 17 a better judgement about whether they were compliant or
 18 not.
 19 Q. Right.
 20 A. Sorry, the other thing about communal areas is that
 21 I knew that he would indicate if there was any issues in
 22 terms of access to the block. I don't think that's
 23 technically included in the fire risk assessment, but
 24 I know that it's something that he would have
 25 identified.

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1 Q. Just focusing on that a little bit more, can we go back
 2 to the July 2010 consultants' brief, please, at
 3 {TMO00842371/6}. You will see at paragraph 1.3 it says:
 4 "FRAs and reviews will focus on ..."
 5 Then there is a list of eight items, and I'll show
 6 them to you in detail:
 7 "i. The compartmentation of the building and any
 8 possible shortcomings with it.
 9 "ii. The operation and adequacy of fire doors
 10 including their fire resistance rating and smoke/fire
 11 seals etc.
 12 "iii. Adequacy of fire fighting equipment.
 13 "iv. Adequacy of automatic detection system,
 14 extraction systems, sprinklers, dry risers, wet risers
 15 etc.
 16 "v. Assessment of the means of escape (to include
 17 final exit doors) and assessment of secondary means of
 18 escape where present and its appropriateness/ viability,
 19 emergency lighting, signage, etc.
 20 "vi. Fitness for purpose of the building in relation
 21 to fire safety.
 22 "vii. Fire safety management systems and their
 23 recording procedures.
 24 "viii. Marking of fire detection and fire fighting
 25 equipment, fire doors (including their fire resistance

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1 rating and smoke/fire seals) and compartmentation on
 2 floor plans provided by the client where possible and in
 3 all other cases to be produced by the consultant.
 4 Symbols and other information marked-up on the drawings
 5 will be the same as in the HM Government Guides 'Fire
 6 Safety Risk Assessment'."

7 Now, was it your understanding that each of those
 8 instructions or those instructions generally included
 9 checking a sample of flat entrance doors?

10 A. Yes.

11 Q. Do you know why the brief didn't say that specifically?

12 A. I don't. But it was always very clear from the outset
 13 of both contracts that that was our expectation and
 14 that's what was being done.

15 Q. Do you know where this list came from?

16 A. Again, it was — this was put together from a variety of
 17 people, so I'm not clear, as I say, looking back which
 18 bits were me, which bits were Alexis, but it was
 19 a combination.

20 Q. Did you have an idea of what kind of percentage of flat
 21 front doors should be sampled in a high-risk high-rise
 22 block such as Grenfell Tower?

23 A. I actually couldn't find anywhere an indication of what
 24 was — what would be good practice. I think — I'm
 25 confident that I raised it with my peers in the London

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1 and South East Fire Safety Group, and I think they were
 2 commonly doing 5% to 10%, so I think 5% to 10% was
 3 pretty standard in the sector, although some people were
 4 perhaps doing significantly more.

5 I think what I always wanted to be assured of is
 6 that, where possible, all different door types were
 7 sampled, and ideally there were several samples of each
 8 so we had a better indication of the condition of each.

9 Q. Did the checks include checking both the inside and the
 10 outside of the door, in other words to include the
 11 checking of self-closing devices, smoke seals, door
 12 furniture, things like that?

13 A. That was my expectation, that where possible, access
 14 should be gained.

15 Q. Did you discuss with Carl Stokes, once he won the
 16 medium-term programme under these terms and thereafter,
 17 because these terms continued to govern, how Carl Stokes
 18 would choose which flat entrance door to assess?

19 A. I did, and it was along the lines of what I've just
 20 stated, actually, that would want — where possible,
 21 where you can get access, I want you to get, if
 22 possible, access to each door type so that you can
 23 review it from inside and out, look at the closer, look
 24 at the door furniture, and then you might have access to
 25 a symbol on the door which gives you better

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1 clarification about what standard it met as well, and
 2 anything that was potentially non-compliant, definitely
 3 try and access that, but ideally multiple versions of
 4 each different style of door.

5 Q. Right.

6 Did you ever tell him that he needed to sample 5% to
 7 10% in order for it to be a representative sample?

8 A. I think I did. I mean, it's difficult because access,
 9 as we know, is an issue, and I suppose the smaller the
 10 block, the less doors you've got as your sample, and
 11 inevitably people are out during the day, at work, at
 12 school, whatever. So, yes, I thought it was commonly
 13 sort of agreed between us that that was what we were
 14 working towards.

15 Q. Right. How would he gain access to tenants' flats?

16 A. He had an ID, and initially in the contract we had
 17 written and written articles in the Link magazine to
 18 advise that we were undertaking these and to encourage
 19 people to provide access and to explain why the access
 20 was required, obviously, and he would engage with people
 21 when he was in the block, explain what he was doing, and
 22 if they were happy to give him access, they would. He
 23 would door knock. If the caretaker, the ESA, was
 24 around, they might be able to suggest that this person
 25 is normally in through the day, or they might be able to

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1 attend with him so that anybody who was concerned about
 2 security or whatever would be assured.
 3 Q. Right. Did you ever consider pre—arranging access for
 4 him to particular flats?
 5 A. We did. Access is a perennial problem for housing
 6 providers, and we did consider it, but to be honest, we
 7 didn't go down that track. Obviously we've got very
 8 exacting requirements in terms of servicing gas
 9 appliances and we've really struggled with that.
 10 You know, our compliance has been very good for many
 11 years, but it is a relentless process and we've got
 12 a number of dedicated people who work exclusively on the
 13 access, so we didn't, is the — to cut a long story
 14 short. I apologise.
 15 Q. Okay.
 16 Did you ever agree with him how his inspections of
 17 flat front doors would be documented in his FRAs?
 18 For example, would he document every door that he
 19 inspected, or only the ones where he found problems?
 20 A. Certainly everywhere where there's a problem would need
 21 to be documented on the significant findings and action
 22 plan. I would expect that in the body of his report,
 23 where possible, he would say — he would at least say,
 24 "I've been able to access eight dwellings", and ideally
 25 I would want him to put the flat numbers, but in truth

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1 I can't recall if he did.
 2 Q. Well, I don't think he did, not in very many instances.
 3 My question then is: if he didn't document which
 4 doors he had inspected, how would you or your team know
 5 in the following year with your FRA review, either
 6 in—house or later, which doors had been looked at?
 7 A. We would know the doors which had been defective —
 8 Q. Yes, but what about those where no defects had been
 9 identified?
 10 A. We wouldn't know that if he didn't record it.
 11 MR MILLETT: Right.
 12 Mr Chairman, I'm really in the middle of the topic
 13 of scope, but I'm certainly not going to finish it by
 14 4.30, because it is 4.30.
 15 SIR MARTIN MOORE—BICK: Yes.
 16 MR MILLETT: So this is a natural moment to break, partly
 17 because of where the clock stands.
 18 SIR MARTIN MOORE—BICK: I'm afraid it is, isn't it,
 19 Mr Millett, otherwise we shall be here for a long time.
 20 MR MILLETT: Indeed. So I'm going to ask you to draw a line
 21 for the day.
 22 SIR MARTIN MOORE—BICK: Yes.
 23 Well, it is 4.30, Ms Wray, and I think it's time we
 24 all stop for the day. So we're going to stop there. We
 25 will resume, please, at 10 o'clock tomorrow. And,

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1 again, please don't talk to anyone about your evidence
 2 or anything relating to it overnight. All right?
 3 THE WITNESS: Okay.
 4 SIR MARTIN MOORE—BICK: Thank you very much.
 5 THE WITNESS: Thank you.
 6 (Pause)
 7 SIR MARTIN MOORE—BICK: Thank you.
 8 MR MILLETT: Thank you.
 9 SIR MARTIN MOORE—BICK: 10 o'clock tomorrow, then, please.
 10 Thank you.
 11 (4.30 pm)
 12 (The hearing adjourned until 10 am
 13 on Tuesday, 8 June 2021)
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