

<p>1 Monday, 11 December 2017</p> <p>2 (10.30 am)</p> <p>3 Welcome/Housekeeping</p> <p>4 SIR MARTIN MOORE-BICK: Well, good morning, everyone, and</p> <p>5 welcome to this procedural hearing, which I've called in</p> <p>6 order to enable us to discuss the future progress of the</p> <p>7 inquiry.</p> <p>8 I'm sorry if the weather has made it difficult for</p> <p>9 some of you to get here this morning, and if you've had</p> <p>10 heavy snow, as I think some of you had, well done for</p> <p>11 making the effort to get here on time. Thank you very</p> <p>12 much.</p> <p>13 I'm sorry that there's fairly limited space for the</p> <p>14 legal teams. We thought that it was important to make</p> <p>15 as much space available as we could in this hearing room</p> <p>16 for bereaved, survivors and other local residents, who</p> <p>17 of course are at the heart of the inquiry. I'm afraid</p> <p>18 that means we have to limit the number of people who can</p> <p>19 attend for any one legal team to two people. I hope you</p> <p>20 can manage to work with that.</p> <p>21 Thank you all for your written submissions, all of</p> <p>22 which I've read and found very helpful, and all of which</p> <p>23 I can assure you I shall read again in the light of what</p> <p>24 you are going to say this morning.</p> <p>25 In that context, I am grateful to Birnbergs for</p> <p>Page 1</p>	<p>1 won't be seen on camera and what you say won't be</p> <p>2 recorded for the purposes of the streaming and the</p> <p>3 transcript. That's the only microphone that is</p> <p>4 recording, and the cameras are here and here, so if you</p> <p>5 are not there you can't be seen and heard by anyone who</p> <p>6 is not in the room.</p> <p>7 Well, that's all I really wanted to say by way of</p> <p>8 introduction. I'm therefore going to call now on</p> <p>9 Mr Millett, counsel for the inquiry, to address me and</p> <p>10 you.</p> <p>11 Opening remarks by MR MILLETT QC</p> <p>12 MR MILLETT: Mr Chairman, by way of introduction, what I am</p> <p>13 going to do is to update the core participants, or CPs,</p> <p>14 as to the work of the inquiry so far and to indicate the</p> <p>15 more pressing issues facing us all so that we can</p> <p>16 together move ahead as speedily as possible with the</p> <p>17 important work before us.</p> <p>18 I start with representation. Present today,</p> <p>19 excluding me and the inquiry legal team here, are some</p> <p>20 23 counsel and solicitor teams representing a large</p> <p>21 number of core participants, or groups of core</p> <p>22 participants.</p> <p>23 Some CPs are present but have not put in written</p> <p>24 submissions and do not wish to address you, some CPs are</p> <p>25 both present and have put in written submissions but do</p> <p>Page 3</p>
<p>1 identifying questions for discussions. I hope they will</p> <p>2 forgive me if I say that I prefer to have advocates</p> <p>3 speaking in the running order that we suggested, but,</p> <p>4 since I have read all your submissions, you are welcome</p> <p>5 to concentrate on particular areas when you come up to</p> <p>6 address me. So I'll leave that to you and if you want</p> <p>7 to deal with a limited range of topics in accordance</p> <p>8 with the Birnbergs timetable, if I can call it that,</p> <p>9 then I'm perfectly happy for you to do that.</p> <p>10 Our timetable allows 30 minutes for counsel. I hope</p> <p>11 that will be enough for you not to feel unduly cramped</p> <p>12 for time. I'm sure you'll understand that it's been</p> <p>13 necessary for us to impose some sort of time limit to</p> <p>14 ensure that everyone who wants to make submissions has</p> <p>15 a chance to do so. You don't, of course, have to take</p> <p>16 up the whole of your allotted time, and if you can get</p> <p>17 through without doing so, I'm sure everyone will be very</p> <p>18 pleased. But please try not overrun; if you do overrun</p> <p>19 you are taking time from somebody else and that would be</p> <p>20 a pity.</p> <p>21 I think you all know that these proceedings are</p> <p>22 being recorded and they are being streamed live to other</p> <p>23 locations. When you are invited to speak, I would be</p> <p>24 grateful if you would come up to the reading desk here.</p> <p>25 It's necessary to ask you to do that, otherwise you</p> <p>Page 2</p>	<p>1 not wish to address you and some CPs are neither present</p> <p>2 nor have put in any written submissions. There may be</p> <p>3 CPs who are not legally represented but who are here</p> <p>4 today, but we have had no indication that they would</p> <p>5 wish to address you.</p> <p>6 All CPs should have an updated speaking list. There</p> <p>7 are some late additions to it for further resident and</p> <p>8 bereaved CPs and for the Fire Officers Association.</p> <p>9 That speaking list is only for this procedural hearing;</p> <p>10 it establishes no precedent.</p> <p>11 The reason we have the MPS, the Metropolitan Police</p> <p>12 Service, as the first CP to speak, is so that they can</p> <p>13 provide a brief update on the criminal investigation.</p> <p>14 The CPs will then speak in two successive</p> <p>15 groups: first, those representing the survivors, the</p> <p>16 residents and the bereaved families, who we suggest</p> <p>17 should speak in alphabetical order according to</p> <p>18 solicitor firm names; second, the CPs who are</p> <p>19 organisations or government departments.</p> <p>20 In terms of total numbers of CPs in this inquiry to</p> <p>21 date, we have some 424 out of a total to date of 554</p> <p>22 applicants for CP status. Those currently with CP</p> <p>23 status are: 60 from families of the deceased, 193 who</p> <p>24 were Grenfell Tower residents, 4 leaseholders, 124 from</p> <p>25 the walkways, one survivor who was neither a resident of</p> <p>Page 4</p>

<p>1 the tower nor of the walkways and 26 CPs who are 2 organisations, including the TMO, the council and the 3 Metropolitan Police Service, and various government 4 departments.</p> <p>5 There has been one application, which is deferred, 6 and we have had indications in the written submissions 7 that further persons will be applying for CP status. 8 The position as regards CPs is, therefore, still 9 a little in flux.</p> <p>10 We will publish a list of CPs in due course, but, 11 with the interests of the survivors and the bereaved in 12 mind, we do not intend to do so without hearing 13 submissions from them.</p> <p>14 In addition to the documents on the inquiry's 15 website, all CPs present here today have had the 16 following documents: our counsel's statement dated 17 15 November, the provisional programme and accompanying 18 letter dated 15 November about this procedural hearing, 19 a copy of the instructions given by the inquiry to our 20 seven experts and all the other CP submissions, save 21 where any CP has wished to remain anonymous.</p> <p>22 What I propose to do, Mr Chairman, is first to 23 introduce the issues briefly for phase 1. I will then 24 move to a consideration of witness evidence for phase 1. 25 I'll then say a little bit about the role of the inquiry</p> <p style="text-align: center;">Page 5</p>	<p>1 is that phase 1 is a purely fact-finding exercise. That 2 is because the logical place to start is to find out 3 what happened and how it happened before moving to why 4 it happened and what could be done to stop it happening 5 again.</p> <p>6 Those issues are issues in the list of issues 7 corresponding to paragraphs 11A and B and 12A, B and D, 8 plus, so far as relevant, the issues at paragraphs 1A, 9 4B and 5A and I.</p> <p>10 All other questions contained in the terms of 11 reference and expanded upon in the list of issues will 12 be considered in phase 2.</p> <p>13 Now, the FBU, the Fire Brigades Union, has suggested 14 a slight expansion of these primary factual issues, and 15 the LFEPA, in other words the London Fire Brigade, has 16 also suggested some clarification that matters such as 17 policy and training be included at phase 1 so as to 18 provide some context around firefighter actions on the 19 night.</p> <p>20 Other CPs have suggested expansion of phase 1 to 21 cover specific further issues, and many have expressed 22 doubt that there is any workable division between 23 phase 1 and 2.</p> <p>24 What issues are or should be added to phase 1 should 25 be approached with an open mind, provided that we all</p> <p style="text-align: center;">Page 7</p>
<p>1 experts at phase 1 and our thoughts on timing. I'll 2 then finish with some points on the document disclosure 3 process.</p> <p>4 We'll then move on to hear various applications by 5 CPs following the speaking order in the list, and I'll 6 then respond at the end to the specific applications 7 before the inquiry and then wrap up.</p> <p>8 In this opening address I don't propose to provide 9 answers to all the many points made in the CPs' written 10 submissions. Instead, we will wait to hear what further 11 points are made to you, Mr Chairman, by the CPs during 12 the next two days.</p> <p>13 So I can turn to issues for phase 1. The focus of 14 phase 1 will be the events of the night of 14 June 2017. 15 In particular, the existing fire safety and prevention 16 measures at Grenfell Tower, where and how the fire 17 started, the development of the fire and smoke, how the 18 fire and smoke spread from its original seat or starting 19 place to other parts of the building, the chain of 20 events before the decision was made that there was no 21 further saveable life in the building, and the 22 evacuation of the residents. Phase 1 will also examine 23 what the emergency services did by way of response and 24 when.</p> <p>25 As we have said in the counsel's statement, the aim</p> <p style="text-align: center;">Page 6</p>	<p>1 stick to the basic principle that it must be 2 an investigation of the facts as they occurred on the 3 night of the fire and into the next day, and provided 4 that it is done as swiftly as possible so as to enable 5 you to report on that question by the autumn of 2018.</p> <p>6 The fire at Grenfell Tower, Mr Chairman, has 7 provoked widespread public concerns about fire safety in 8 tower blocks both in Britain and internationally, and 9 those concerns must be addressed urgently.</p> <p>10 The answers to the phase 1 issues will not 11 necessarily provide all the answers on public safety, 12 but they will go a long way to providing a measure of 13 clarity and may enable urgent recommendations to be made 14 at an interim stage.</p> <p>15 In addition, and perhaps most importantly, this 16 inquiry does need to be conducted promptly. The need 17 for promptness is strongly supported today by the 18 submissions of many of the CPs, including the Mayor, 19 Mr Sadiq Khan. That applies to both phases of this 20 inquiry.</p> <p>21 I then turn now to the witness evidence at phase 1.</p> <p>22 The basic underlying logic of our provisional 23 programme at phase 1 is that the phase 1 factual witness 24 evidence, both written and oral, will come from three 25 sources: first, the Grenfell Tower residents, in other</p> <p style="text-align: center;">Page 8</p>

<p>1 words the survivor residents of the tower, residents of 2 the walkways and the bereaved families of those who were 3 lost in the tower; second, firefighters including 4 incident commanders and certain control room staff; and, 5 third, experts called by the inquiry. 6 I'm going to come back to the question of experts in 7 due course. I just want to focus for the moment, if 8 I may, on the phase 1 factual witness statements. 9 As to the Grenfell Tower survivors, residents and 10 the bereaved, it is of great importance to the inquiry 11 that each individual voice of those most affected by the 12 fire is heard. This was a shared trauma, a community 13 devastated. But each of them has their own story to 14 tell. Their evidence will be crucial to the inquiry's 15 understanding of what happened inside and around 16 Grenfell Tower, before the fire, during the fire and 17 after the fire. Their evidence can and will help us to 18 save the lives of others. Giving that evidence is also 19 one aspect of the way in which each of them individually 20 can be heard, and perhaps find some measure of closure. 21 The fire at Grenfell Tower was an utterly appalling 22 event, and the experiences of it are stamped on the 23 lives of the many to whom Grenfell Tower was home and of 24 the families of those who were lost, and each in so many 25 different ways.</p> <p style="text-align: center;">Page 9</p>	<p>1 exhibits, where they have given them, any 999 calls 2 relevant to them and any photographs or videos that they 3 made. In essence, a witness pack, one for each. 4 There are strict security arrangements as to the use 5 of any material coming from the police investigation. 6 Those are governed by our memorandum of understanding 7 with the police. It's for the inquiry team to provide 8 these witness packages to them, subject to the 9 memorandum of understanding. 10 The statements that they made to the police which 11 are given to their solicitors must be sent back to the 12 police by the inquiry once their statements are signed. 13 There are some who are willing to provide their 14 phase 1 statements to us within some six to eight weeks 15 or so after receipt of this basic phase 1 information. 16 We warmly welcome that approach. That would at least 17 allow the inquiry to feed their vital written evidence 18 and experiences about what happened on the night of the 19 fire into the inquiry experts' work on phase 1 and the 20 opening statements for counsel to the survivors, 21 residents and bereaved, so as to ensure that the phase 1 22 expert conclusions and your report, Mr Chairman, on the 23 phase 1 issues are as comprehensively evidence-based as 24 possible. 25 Some of their solicitors have requested disclosure</p> <p style="text-align: center;">Page 11</p>
<p>1 As individuals, they may each have a different wish 2 and a different view as to how they individually can 3 assist and join in the work of the inquiry and how the 4 inquiry can assist them to give their evidence. 5 We do understand that many of them have other 6 immediate issues which are far more pressing than 7 assisting this inquiry. We also recognise that being 8 asked to relive the events of the night, to prepare 9 a statement for the inquiry, will for many of them be 10 difficult and traumatic, and the process of giving oral 11 evidence to the inquiry equally if not more challenging. 12 But we must also try to move promptly and 13 effectively, with the aim of learning lessons from this 14 awful event, in order to save the lives of others and in 15 order to ensure that something like this can never 16 happen again. 17 That, in turn, means that we must work towards 18 producing a phase 1 report by the autumn of next year in 19 order to start to address those urgent public safety 20 issues. 21 As to the witness statements which we would like the 22 survivors, residents and bereaved to give us for 23 phase 1, we envisage that these will be taken by their 24 respective solicitors and will be prepared with the 25 benefit of their individual police statements and</p> <p style="text-align: center;">Page 10</p>	<p>1 of their housing files in order to start work. We're 2 not clear at the moment what would be in those files 3 that would be relevant to the phase 1 issues and so we 4 would welcome clarification on that. 5 There are also some who may not wish to provide any 6 statement to the inquiry until we have all the phase 1 7 and phase 2 disclosure, or who would only wish to give 8 evidence to the inquiry at phase 2 and in one go. We 9 would ask that they help the inquiry to work effectively 10 by agreeing to provide us anyway with their standalone 11 phase 1 written statements based on their own individual 12 preliminary evidence packs. However, if they do not 13 wish to give oral evidence more than once then we will 14 only call them to do so as phase 2, even if that means 15 hearing further phase 1 evidence. 16 We would therefore invite their solicitors to 17 consider these issues further as soon as possible and 18 then to inform the inquiry how they would wish to 19 proceed. 20 The inquiry wrote to the numerous solicitors for the 21 CPs on 7 November asking them to identify each survivor, 22 resident or bereaved client who was able and willing to 23 give evidence about the events of 14 June, and whether 24 they had provided statements to the police. Some 25 solicitors have indicated that they are willing and able</p> <p style="text-align: center;">Page 12</p>

<p>1 to do so, but the numbers are as yet very small and we 2 would encourage them all to communicate with us on these 3 issues as soon as possible and tell us which client is 4 willing to provide statements for phase 1. 5 We wrote again on 28 November reminding solicitors 6 to provide us with that information and confirming 7 advanced funding with which to be able to provide it. 8 We would also invite all those solicitors to sign and 9 return the undertakings that we've sent them so that the 10 police material can be provided to them. 11 I would also repeat what we've said in the counsel's 12 statement, that the written witness evidence from 13 survivors, residents and the bereaved on the subject of 14 the personal impact of the fire on them will, if they so 15 wish, form part of the formal inquiry record come what 16 may, and regardless of whether they have any other 17 evidence of relevance and whether or not they are called 18 to give oral evidence. Each personal experience is as 19 important as the next, and each statement about it will 20 be treated in the same way so as to form an enduring 21 written testimony. 22 There will in due course be further correspondence 23 or announcements about how the inquiry will take any 24 evidence from vulnerable witnesses, including children. 25 We would welcome further dialogue with solicitors about</p> <p style="text-align: center;">Page 13</p>	<p>1 So far as the provisional programme is concerned, 2 I'm not proposing to go through that in detail at this 3 stage. Clearly some of the detail in it will need to be 4 revisited in the light of the submissions that we have 5 received for this hearing and which, Mr Chairman, will 6 be developed orally before you over the next two days. 7 We do hope to be in a position to publish a more 8 detailed timetable in January before a further 9 procedural hearing, which we would anticipate holding 10 towards the end of January 2018. 11 I turn next to the question of experts to the 12 inquiry. I am going to provide an update on the work of 13 the experts who have currently been instructed. 14 As you, Mr Chairman, explained in your opening 15 statement, many of the questions which have to be 16 answered in this inquiry are of a highly technical 17 nature. To that end, the inquiry has instructed 18 a number of respected experts, including in the field of 19 fire forensic analysis and fire engineering to assist 20 the inquiry by examining the evidence and producing 21 expert reports. 22 The identities of those experts were published on 23 12 October 2017. More recently, and in response to 24 requests from core participants to do so, the inquiry 25 published its letters of instruction to each expert.</p> <p style="text-align: center;">Page 15</p>
<p>1 this subject over the forthcoming weeks in order to 2 identify at an early stage those who may fall into this 3 category. 4 There are a very small number of resident CPs who 5 are currently without legal representation. It would be 6 helpful to the work of the inquiry if those persons 7 would instruct one of the firms of solicitors currently 8 acting for the CP residents, survivors and the bereaved 9 also to act for them. To the extent that they do not 10 wish to be represented but do wish to make a statement, 11 they are strongly encouraged to contact the solicitor to 12 the inquiry and she will make the necessary 13 arrangements. 14 I turn to firefighters. The witness statements of 15 those members of the London Fire Brigade who fought the 16 fire on the night and the following day and were in 17 command of the firefighting responses are being taken by 18 the police in close liaison with the London Fire Brigade 19 and the Fire Brigades Union, the FBU. 20 The inquiry expects that interviews with the some 21 250 or so firefighters will have been completed by 22 Christmas, and that the totality of the signed 23 firefighter statements will have been provided to the 24 inquiry team by the end of January 2018. We have 25 already received more than 40.</p> <p style="text-align: center;">Page 14</p>	<p>1 Some of the experts have been asked to produce a phase 1 2 report as well as a phase 2 report, and others will not 3 be reporting until phase 2. 4 I would like briefly to identify those experts and 5 expand on the areas that they've been asked to address. 6 First, Professor Niamh Nic Daeid. She is 7 a professor at the University of Dundee and is an expert 8 in forensic science and fire scene investigation. She 9 has been instructed to advise on the cause and spread of 10 the fire in the flat of origin and the spread of fire 11 within and out of that compartment. She will be 12 producing a report at phase 1 only. 13 Next there is Professor Luke Bisby. He is 14 a professor at the University of Edinburgh engineering 15 department. He is a structural engineer and an expert 16 in fire structures. He has been instructed to opine on 17 the ignition of the facade materials, including the 18 cladding and insulation, and the fire spread over the 19 building's external facade. Those issues will be 20 addressed in a phase 1 report. 21 At phase 2 he will also report in further detail on 22 the performance of the materials which formed part of 23 the external envelope and the contribution to the spread 24 of the fire, together with any issues relating to the 25 mechanical response of the concrete structure of the</p> <p style="text-align: center;">Page 16</p>

<p>1 building.</p> <p>2 Next, there is Professor Barbara Lane. She is</p> <p>3 a chartered fire engineer and a UK leader for the</p> <p>4 Applied Innovation and Technology Group at Arup, a large</p> <p>5 firm of engineering consultants. At phase 1 she will be</p> <p>6 producing a report which addresses the active and</p> <p>7 passive fire protection measures within the building and</p> <p>8 the extent to which they failed to control the spread of</p> <p>9 fire and smoke and contributed to the speed at which the</p> <p>10 fire spread.</p> <p>11 At phase 2 she will be giving an opinion on the</p> <p>12 design and construction of the building, whether</p> <p>13 regulations, legislation, guidance and industry practice</p> <p>14 were complied with and the fire safety measures adopted</p> <p>15 in relation to it.</p> <p>16 Next, Steve McGuirk. He is a former chief fire</p> <p>17 officer who previously led three of the country's</p> <p>18 largest fire and rescue services: Cheshire, South</p> <p>19 Yorkshire and Greater Manchester, in a career which</p> <p>20 spanned 39 years in the fire service. He will be</p> <p>21 producing a phase 2 report, which will focus on the</p> <p>22 adequacy of the London Fire Brigade inspections and risk</p> <p>23 assessments and procedures and training for high-rise</p> <p>24 buildings. He will also be looking at the adequacy of</p> <p>25 the London Fire Brigade's response on the night, but</p> <p style="text-align: center;">Page 17</p>	<p>1 assist in answering various questions about the fire,</p> <p>2 including the contribution of the design and</p> <p>3 construction of the building to the fire and smoke</p> <p>4 spread and factors which may have influenced those</p> <p>5 things.</p> <p>6 Finally, there is Professor Jose Torero. He is</p> <p>7 a professor of fire protection engineering at the</p> <p>8 University of Maryland in the US. He will be reporting</p> <p>9 on the forensic fire spread throughout the building at</p> <p>10 phase 1 of the inquiry's work.</p> <p>11 At phase 2 he will be looking at the correlation</p> <p>12 between the fire safety provisions and strategy for</p> <p>13 Grenfell Tower and the adequacy of the London Fire</p> <p>14 Brigade procedures for dealing with fires in high-rise</p> <p>15 blocks. He will also provide an overview of conclusions</p> <p>16 to be drawn about the fire, including lessons to be</p> <p>17 learnt in the context of other fires, both</p> <p>18 internationally and domestically.</p> <p>19 In the submissions which you have received for this</p> <p>20 hearing, Mr Chairman, the question of expert evidence</p> <p>21 has been raised by a number of core participants. Prior</p> <p>22 to hearing any further oral submissions which CPs may</p> <p>23 wish to make on this subject, it may assist you if</p> <p>24 I make the following points, and there are seven of</p> <p>25 them.</p> <p style="text-align: center;">Page 19</p>
<p>1 also the adequacy of the response to similar incidents,</p> <p>2 including the Lakanal House fire.</p> <p>3 Next there is Colin Todd. He is an expert in fire</p> <p>4 safety legislation and runs a consultancy in fire risk</p> <p>5 assessment. At phase 1 he will be producing a report</p> <p>6 which sets out the different statutory and regulatory</p> <p>7 requirements in force over the lifetime of this</p> <p>8 building, i.e. since the early 1970s to the present day.</p> <p>9 He will also explain how the needs of vulnerable persons</p> <p>10 must be considered and met in accordance with the</p> <p>11 relevant statutory duties.</p> <p>12 At phase 2 he will consider the adequacy of risk</p> <p>13 assessments in relation to Grenfell Tower and the extent</p> <p>14 to which regulations, legislation, guidance and industry</p> <p>15 practice were complied with in the case of</p> <p>16 Grenfell Tower and fire safety measures adopted in</p> <p>17 relation to it.</p> <p>18 Next we have Professor Edwin Galea. He is</p> <p>19 a professor and director of fire safety engineering at</p> <p>20 the University of Greenwich. He is a fire engineer but</p> <p>21 with particular expertise in human behaviour and</p> <p>22 evacuation. He will be producing a report at phase 2</p> <p>23 which will involve and include various computer</p> <p>24 modelling, including a fire and smoke modelling and</p> <p>25 fatality and evacuation model. That modelling will then</p> <p style="text-align: center;">Page 18</p>	<p>1 First, it is the case that careful conflict checks</p> <p>2 were carried out in relation to all experts before they</p> <p>3 were instructed. As inquiry counsel, we are satisfied</p> <p>4 that none of our experts is conflicted and we will</p> <p>5 ensure that their written reports to the inquiry contain</p> <p>6 appropriate declarations to that effect when they are</p> <p>7 produced.</p> <p>8 That includes the most recent enquiries raised by</p> <p>9 the Fire Brigades Union about Mr McGuirk and</p> <p>10 Ms Redfearn, to whom we have put those concerns and have</p> <p>11 received full and satisfactory responses. Although it's</p> <p>12 correct that they know each other professionally, the</p> <p>13 inquiry team has no concerns that they will not be able</p> <p>14 to discharge their respective roles as expert and as</p> <p>15 assessor respectively to the highest standards of</p> <p>16 independence and integrity.</p> <p>17 Secondly, we recognise that core participants have</p> <p>18 not had long to digest the instruction letters to</p> <p>19 experts which were circulated on 30 November. We would</p> <p>20 welcome any observations that CPs may have on those</p> <p>21 instructions which can be made in writing after this</p> <p>22 hearing if that is convenient. The inquiry has been</p> <p>23 asked to provide the CVs of these experts in due course</p> <p>24 and this seems to the inquiry team to be a sensible</p> <p>25 suggestion which we will take forward so as to ensure</p> <p style="text-align: center;">Page 20</p>

<p>1 that those CVs are circulated as soon as possible. They</p> <p>2 would be attached to the written experts' reports in any</p> <p>3 event.</p> <p>4 Thirdly, as inquiry counsel we recognise that there</p> <p>5 are other areas of expertise where expert evidence may</p> <p>6 be necessary. This remains an ongoing issue which is</p> <p>7 being actively considered as the expert evidence</p> <p>8 develops and if and when it becomes apparent that other</p> <p>9 areas of expertise are required. It appears highly</p> <p>10 likely that there will be a need for other experts at</p> <p>11 phase 2 and we will keep that under review as the</p> <p>12 inquisitorial process unfolds.</p> <p>13 Fourth, a number of concerns have been raised about</p> <p>14 the precise cut-off point between the expert evidence in</p> <p>15 phase 1 and in phase 2. For example, questions have</p> <p>16 been raised about whether it is necessary to have</p> <p>17 any qualitative assessment of the active and passive</p> <p>18 fire safety measures within the building at phase 1 and</p> <p>19 as part of a consideration of whether they failed to</p> <p>20 control the spread of fire and smoke.</p> <p>21 Whilst it's right that the principal focus of</p> <p>22 phase 1 is about establishing the factual events of the</p> <p>23 night, our submission is that it is necessary at this</p> <p>24 early stage to understand how those active and passive</p> <p>25 measures performed, not least given the need to report</p> <p style="text-align: center;">Page 21</p>	<p>1 the police. We understand that the police's position is</p> <p>2 that access generally for core participant experts</p> <p>3 cannot occur while the site remains a crime scene and</p> <p>4 that access in the future will be a question for the</p> <p>5 owners of the building to determine once the site is</p> <p>6 handed back to them by the police.</p> <p>7 In order to mitigate the lack of access at the</p> <p>8 present time, we have asked our inquiry experts to keep</p> <p>9 a careful eye and record of their visits to the tower,</p> <p>10 which will form part of their reports and which will</p> <p>11 hopefully assist other experts when it comes to</p> <p>12 considering their work.</p> <p>13 We will also continue to encourage the police, and</p> <p>14 the owners of the building in due course, to permit</p> <p>15 access to the site at a time when that is considered</p> <p>16 compatible with the criminal investigation, and assuming</p> <p>17 that such access can be safely facilitated given the</p> <p>18 condition of the building.</p> <p>19 Seventhly and finally, I would reassure all core</p> <p>20 participants that all evidence relied upon by the</p> <p>21 inquiry experts will be appropriately annexed and</p> <p>22 cross-referred to in the inquiry expert reports so that</p> <p>23 the evidential basis for those reports is absolutely</p> <p>24 clear, objectively verifiable and readily digestible.</p> <p>25 Now I turn to the question of disclosure.</p> <p style="text-align: center;">Page 23</p>
<p>1 on matters affecting public safety in the interim report</p> <p>2 after phase 1 has concluded by way of evidence.</p> <p>3 There is also a need to ensure that any conclusions</p> <p>4 about fire spread at phase 1 are appropriately informed</p> <p>5 by an understanding of the fire safety measures and</p> <p>6 issues which were actually present in the building.</p> <p>7 Fifthly, a number of core participants have raised</p> <p>8 the possibility that they may wish in due course to</p> <p>9 apply to instruct their own experts. They note that the</p> <p>10 current provisional timetable in the provisional</p> <p>11 programme does not allow sufficient time to digest the</p> <p>12 inquiry experts' reports and make any such applications.</p> <p>13 We are sympathetic to that and we do recognise that</p> <p>14 core participants may need longer to digest the reports</p> <p>15 and make any such applications. We suggest that this be</p> <p>16 taken into account when it comes to setting down the</p> <p>17 directions in the lead-up to the commencement of the</p> <p>18 phase 1 hearings. This is not, I should say,</p> <p>19 an invitation to apply; core participants will be</p> <p>20 expected to make out why they should be treated</p> <p>21 exceptionally.</p> <p>22 Sixthly, a number of core participants have raised</p> <p>23 the question of whether their experts may have access to</p> <p>24 the site. As to that, the site remains a crime scene</p> <p>25 and, as a result, any access is strictly controlled by</p> <p style="text-align: center;">Page 22</p>	<p>1 A number of core participants have asked questions</p> <p>2 about the inquiry's processes for obtaining documents</p> <p>3 and onward disclosure to core participants. I provided</p> <p>4 an update on disclosure in my counsel's statement on</p> <p>5 15 November at paragraphs 11 to 13. In that statement</p> <p>6 I said that we would provide further details about how</p> <p>7 the mechanics of disclosure would work in due course.</p> <p>8 I understand, and I know, that some core participants</p> <p>9 want further clarity now and I'm very happy to provide</p> <p>10 that.</p> <p>11 It's important to note at the outset that the</p> <p>12 process of obtaining relevant documents started</p> <p>13 immediately after the inquiry set-up date in August this</p> <p>14 year. It remains ongoing. A large number of document</p> <p>15 request letters, requesting all documents relevant to</p> <p>16 the inquiry's terms of reference, were sent out within</p> <p>17 the first few weeks of the establishment of the inquiry.</p> <p>18 Relevance is defined in paragraph 3 of the document</p> <p>19 protocol as:</p> <p>20 "... those which, having regard to the inquiry's</p> <p>21 terms of reference, it is likely that the inquiry panel</p> <p>22 would, if aware of their existence, wish to be provided</p> <p>23 with."</p> <p>24 As explained in the protocol at paragraph 10,</p> <p>25 providers are required to undertake:</p> <p style="text-align: center;">Page 24</p>

<p>1 "... comprehensive, thorough and rigorous searches 2 in response to a request for documents." 3 Now, in order to help document providers, the 4 inquiry also identified specific categories of document 5 which the inquiry expected would be included in such 6 disclosure. Those letters were sent to a wide range of 7 persons and organisations. 8 Many of those requests resulted in very significant 9 numbers of documents being provided to the inquiry. The 10 inquiry has currently gathered approximately 231,000 11 documents from some 33 document providers, 12 i.e. an additional 31,000 documents since our counsel's 13 statement in mid-November. That number continues to 14 increase week on week as we identify more document 15 providers and ask existing document providers for more 16 documents. Such document providers are giving us 17 rolling disclosure. 18 We estimate that there may be at least another 19 40,000 documents to come, so we will probably have some 20 270,000 documents in all. That does not include the 21 phase 1 999 calls and pictorial material which we will 22 have obtained from the police. 23 To date, the solicitor to the inquiry has requested 24 documents from a wide range of providers, as I say, 25 including those responsible for Grenfell Tower, public</p> <p style="text-align: right;">Page 25</p>	<p>1 Core participants have asked what processes the 2 inquiry has in place to ensure that providers have not 3 been selective and that all relevant documents have been 4 disclosed. The processes are as follows: each provider 5 has been asked to provide a signed inventory of 6 documents. That's required at paragraph 13 of the 7 documents protocol. If appropriate, the inquiry has 8 requested a witness statement from the provider setting 9 out details of how the documents were originally stored, 10 search terms used or other processes used to locate 11 documents and the nature of any review carried out by 12 the document provider. 13 Where the inquiry has any queries or concerns about 14 a provider's processes for locating relevant documents, 15 it has raised them and pursued them. As documents have 16 been reviewed and gaps have been identified, further 17 documents have been sought. To the extent that it has 18 been necessary for the inquiry to see documents in the 19 format in which they were originally stored or 20 organised, we have requested copies in that format. 21 This process will continue throughout the inquiry's 22 investigation. 23 Some have also asked whether the inquiry has taken 24 steps to seize documents before they are destroyed. 25 You, Mr Chairman, do not have the power to seize</p> <p style="text-align: right;">Page 27</p>
<p>1 authorities, the emergency services, designers, 2 contractors, suppliers and manufacturers. 3 If at any stage it comes to light that further 4 requests for information or documents need to be made, 5 then that is actioned swiftly by the inquiry team. 6 There have been occasions where further information 7 has come to light about who may have had a role to play 8 in the matters that the inquiry is investigating, and, 9 as that information has become available, the solicitor 10 to the inquiry has made document requests of other 11 organisations and persons. 12 The inquiry has devoted a considerable amount of 13 resource to the disclosure exercise. Once documents 14 have been obtained, the inquiry has in place a large 15 team of paralegals and junior barristers who are 16 responsible for reviewing the documents for relevance 17 and for categorising the documents in a way which 18 reflects the inquiry's list of issues. That work is 19 supervised by an experienced barrister and, in turn, 20 closely monitored by counsel to the inquiry. 21 At the moment our review rate is about 12,000 22 documents per week. We estimate that that will rise 23 in January to about 20,000 documents per week as we 24 bring on stream more barristers and more paralegals to 25 the review teams.</p> <p style="text-align: right;">Page 26</p>	<p>1 documents; however, you do have the power to compel 2 production of documents under section 21 of the 3 Inquiries Act. There are also provisions in section 35 4 of the Inquiries Act which make it an offence if, during 5 the course of an inquiry, a person does anything to 6 alter or distort a relevant document or prevent any 7 relevant document being produced to the inquiry, or 8 intentionally destroys, suppresses or conceals 9 a relevant document. 10 At this stage, provision of documents has been 11 voluntary and the inquiry has had considerable 12 co-operation from document providers, but it has been 13 made clear in the protocol that you will consider 14 exercising your section 21 powers in circumstances where 15 a request is refused, incomplete or not provided by the 16 stated deadline. 17 In any event, the Metropolitan Police Service seized 18 a very considerable number of documents in the days and 19 weeks following the fire as part of its criminal 20 investigation. If it becomes necessary to do so, the 21 inquiry can request access to those documents from the 22 police, pursuant to the terms of the memorandum of 23 understanding. 24 Finally, a number of core participants have 25 requested disclosure of all document requests and of</p> <p style="text-align: right;">Page 28</p>

<p>1 full transparency over the inquiry's process for 2 obtaining documents.</p> <p>3 We're sympathetic to the desire for core 4 participants to understand the inquisitorial processes 5 which are being adopted. We understand that, at this 6 early stage in the work of the inquiry and prior to the 7 disclosure to core participants of relevant information, 8 individuals are anxious to know what work has been 9 taking place and to receive some reassurance that 10 relevant documents are expeditiously being gathered.</p> <p>11 In that regard I would make three points at this 12 stage.</p> <p>13 First, as an inquiry team, we propose to give 14 regular disclosure updates in which we can report on 15 progress which has been made in obtaining relevant 16 documents. We will also aim to do so at any procedural 17 hearings, although we are happy to meet representatives 18 of the core participants to explain in greater detail 19 how that process is being progressed.</p> <p>20 Secondly, we would wish to emphasise that core 21 participants will be receiving a large quantity of 22 relevant material in due course, once the inquiry has 23 digested the material in raw form which it has received. 24 We do not propose only to provide core participants with 25 documents relevant to them; everybody will receive the</p> <p style="text-align: center;">Page 29</p>	<p>1 In terms of document requests, we've explained our 2 processes in the documents protocol and I have given 3 details as to how we propose to put that protocol into 4 practice. We are regularly going back to document 5 providers with queries or further requests and, although 6 we are, as I say, very happy to provide regular updates 7 on disclosure, it is not necessary or proportionate to 8 disclose every single piece of correspondence or 9 exchange on this subject as that would impose 10 a significant administrative burden on the inquiry, 11 thereby distracting the inquiry from its inquisitorial 12 work.</p> <p>13 In terms of disclosure to core participants, the 14 inquiry has received a substantial number of documents 15 that are irrelevant to its investigation on any view. 16 It has also received a significant number of duplicates, 17 and it would be costly on timing for core participants 18 to work through irrelevant and duplicate documents. It 19 would also place a further burden on the inquiry team as 20 the redactions process would need to be applied to all 21 documents, not just relevant documents.</p> <p>22 In those circumstances, we would propose that the 23 inquiry should provide all core participants with 24 relevant documents in due course.</p> <p>25 Prior to that, we are very happy to receive</p> <p style="text-align: center;">Page 31</p>
<p>1 same documents.</p> <p>2 We will provide all documents that the inquiry has 3 received subject to four things: first, a relevance 4 review so that only relevant documents are provided; 5 second, a de-duplication exercise, as we have already 6 identified very significant duplication in the some of 7 the documents which have been provided to us; third, the 8 memorandum of understanding with the police; and, 9 fourth, a form of redactions in accordance with the 10 redactions protocol.</p> <p>11 A number of core participants have urged us to begin 12 the process of phase 1 disclosure as soon as possible 13 and to ensure that phase 2 disclosure does not await the 14 conclusion of phase 1.</p> <p>15 Again, we are sympathetic to that and we will try to 16 ensure that disclosure of relevant material is disclosed 17 as soon as possible so that it can be digested by the 18 core participants, or at least the process can start.</p> <p>19 We will also give further thought to the suggestion 20 of rolling disclosure at logical points in the lifetime 21 of the inquiry.</p> <p>22 Thirdly, it isn't, however, sensible or practicable 23 to disclose every document request the inquiry has made, 24 nor is it possible to disclose to core participants 25 every document the inquiry has received.</p> <p style="text-align: center;">Page 30</p>	<p>1 suggestions from core participants about lines of 2 inquiry which they think we should be pursuing if there 3 is any concern that particular categories of document 4 may not be being sought. We are also happy to meet with 5 representatives of core participants so that we can 6 discuss with them in detail any concerns that they may 7 have about the gathering of relevant information and the 8 disclosure that they will be receiving in due course.</p> <p>9 Core participants will also be in a good position, 10 once they receive the relevant documents for each phase 11 of the inquiry, to make further suggestions if they feel 12 that there are any areas where further documents or 13 information ought to be sought.</p> <p>14 To conclude, I have laid out where the inquiry 15 stands at present in procedural terms, but we are here 16 to listen to all core participants about how this 17 inquiry should proceed, so that in our planning we can 18 take careful account of what they say.</p> <p>19 Thank you very much.</p> <p>20 SIR MARTIN MOORE-BICK: Thank you very much, Mr Millett.</p> <p>21 Now, Mr Johnson, you are here for the Metropolitan 22 Police Service, I believe. Would you like to say 23 something now.</p> <p>24 Submissions on behalf of the Metropolitan Police Service 25 by MR JOHNSON QC</p> <p style="text-align: center;">Page 32</p>

<p>1 MR JOHNSON: Chairman, as you know, my name is 2 Jeremy Johnson. I appear with Amy Clarke, instructed by 3 Sarah Winfield for the Metropolitan Police. 4 There are many families, residents and survivors, as 5 well as other core participants, who have important 6 submissions to make to you. I don't have any 7 applications to make and I don't want to eat into their 8 time and I won't do so. 9 What I do want to do briefly is three 10 things: firstly, to provide some information about the 11 police investigation; second, to provide some 12 observations about the different functions of your 13 inquiry and the police investigation; and, third, to 14 provide some observations about the consequences of 15 there being two parallel investigations serving 16 different but linked functions. 17 First, the police investigation. 18 We have, through you, published to core participants 19 the terms of reference of the police investigation. The 20 Metropolitan Police is committed to carrying out 21 a meticulous, thorough and fearless investigation in 22 order to identify all those who may have committed 23 criminal offences and to refer files to the Crown 24 Prosecution Service for decisions on prosecutions. That 25 is a process that we respectfully submit is desperately</p> <p style="text-align: center;">Page 33</p>	<p>1 every inch of the communal areas and, of course, 2 importantly, the outside of the tower. 3 After that analysis has been completed there will be 4 a series of further forensic tests, including 5 reconstructions. 6 The full and accurate picture of how the fire spread 7 and took hold can only be obtained from that forensic 8 evidence once it's in complete form. The Metropolitan 9 Police does not expect it to be complete until the 10 autumn of next year. Interviews of further witnesses or 11 of suspects in the light of that examination are 12 therefore not likely to take place before autumn 2018. 13 Of course, the police wish that this could be done 14 more quickly. But there is a robust logic to that 15 timetable, and all I can say is that my client is 16 committed to keeping the families and survivors updated 17 as to the progress of the investigation in regular 18 briefings. 19 Chairman, secondly, the different functions of your 20 inquiry and the police investigation. 21 Your inquiry, established by the Prime Minister, 22 serves many vital functions that cannot be fulfilled by 23 a police investigation. Most importantly, it ensures 24 a public examination of everything that is within your 25 broad terms of reference, and a public examination in</p> <p style="text-align: center;">Page 35</p>
<p>1 needed and carries with it a huge level of 2 responsibility to the public generally and the victims 3 of the fire in particular. 4 The criminal offences that are being investigated 5 include but are not limited to: offences of 6 manslaughter, offences of corporate manslaughter, 7 misconduct in public office and breaches of fire safety 8 legislation. Nothing has been excluded from the scope 9 of the criminal investigation. 10 Outside certain counter-terrorism inquiries, the 11 investigation is unprecedented in terms of its scale and 12 complexity. Just to give some figures, as at last 13 Monday, 187 police officers and civilian staff had been 14 assigned to the investigation, well in excess of 15 31 million documents had been gathered, 2,500 physical 16 exhibits had been seized, 2,332 witness statements had 17 been taken from 1,144 witnesses, and 383 companies had 18 been identified as having some involvement in or 19 connection to the construction or refurbishment of 20 Grenfell Tower. There were some 3,916 investigative 21 tasks or lines of inquiry that had been generated. 22 The Metropolitan Police has instructed a number of 23 forensic experts to consider every aspect of the cause 24 and spread of the fire and smoke. That involves careful 25 analysis of every room within the tower, as well as</p> <p style="text-align: center;">Page 34</p>	<p>1 which core participants can take part, including, in 2 particular, families, survivors and residents. That is 3 not something that a criminal investigation can do. The 4 police are absolutely committed to the regular briefings 5 I have mentioned. But everyone I think understands that 6 a criminal investigation cannot sensibly take place with 7 the sort of publicity that a public inquiry can and 8 must. 9 Conversely, chairman, your inquiry, as you have made 10 clear, cannot make determinations of criminal liability. 11 That is something that can only be done by a criminal 12 investigation followed, if appropriate, by criminal 13 trials. Justice can only be achieved in that sense if 14 that process is able to take place, such that any 15 individual or corporation who may have committed 16 a criminal offence is held to account in an independent 17 and fair investigative and judicial process. 18 Third, the consequence of the two processes running 19 in parallel. 20 There are two extreme options that could be adopted. 21 One would be for the inquiry simply not to start work 22 until the criminal investigation had been completed. We 23 do not and have never suggested that that is appropriate 24 here. We respectfully agree that it is possible for the 25 two to run in parallel, so long as, importantly, there</p> <p style="text-align: center;">Page 36</p>

<p>1 are appropriate safeguards to prevent prejudice to the 2 criminal investigation.</p> <p>3 The other extreme would be for the inquiry to launch 4 immediately into a public examination of every aspect of 5 its terms of reference without any regard to the impact 6 that might have on the police investigation. I do not 7 understand anyone to support that approach.</p> <p>8 The middle course is for the inquiry to make use of 9 evidence that is obtained in the course of the police 10 investigation, but to do so in a way that minimises the 11 risks or prejudice to that investigation or subsequent 12 criminal proceedings.</p> <p>13 That is the course that we respectfully suggest, and 14 it is reflected in the memorandum of understanding that 15 has been agreed between the police investigation and 16 your inquiry, and which, in the interests of 17 transparency, is published on your website.</p> <p>18 That course is also consistent with the phased 19 approach that the inquiry is taking, and which is in any 20 event rendered necessary in order for the inquiry to 21 report on urgent safety issues within a time period 22 which is simply not compatible with anything other than 23 a phased approach.</p> <p>24 Chairman, it's not easy and it will give rise to 25 many difficult issues on which judgments will have to be</p> <p style="text-align: center;">Page 37</p>	<p>1 access to what is a crime scene to experts instructed on 2 behalf of many other bodies.</p> <p>3 What I can say is that there will come a point when 4 it may be possible to allow limited and controlled 5 access to the tower, where that is necessary, and we 6 will certainly engage with the inquiry and other core 7 participants in relation to that.</p> <p>8 Chairman, we note that in the written submissions of 9 at least one corporation issue was taken with the 10 conclusions that are said to have been reached by 11 forensic experts. I am going to resist the temptation 12 to engage with that. We respectfully submit that it is 13 not an issue on which it's remotely appropriate for you 14 to rule at this stage. It will, of course, be open to 15 the inquiry and core participants to test the evidence 16 in the course of the hearings.</p> <p>17 Chairman, that is all I wish to say on behalf of the 18 Metropolitan Police.</p> <p>19 SIR MARTIN MOORE-BICK: That's very helpful. Thank you very 20 much, indeed.</p> <p>21 Now, Mr Friedman, you appear next in the running 22 order. Are you ready to go?</p> <p>23 Thank you very much.</p> <p>24 Submissions on behalf of core participants represented by 25 Bhatt Murphy/Bindmans/Hickman & Rose, Hodge, Jones &</p> <p style="text-align: center;">Page 39</p>
<p>1 reached, but nor is it impossible. This approach means 2 that the inquiry will have the benefit of material 3 produced by the criminal investigation. It will, for 4 example, have all the expert reports that are produced. 5 That, of course, does not mean that the inquiry or the 6 inquiry's experts are obliged to agree with experts who 7 have been instructed by the Metropolitan Police. The 8 inquiry is entirely independent of The Metropolitan 9 Police, as are you and your inquiry team. The inquiry 10 has, with a high degree of transparency, instructed its 11 own experts, who are themselves independent, and the 12 police have provided them, where necessary, with the 13 access to the tower and physical exhibits. That means 14 that your inquiry can reach its own conclusions as to 15 the cause and spread of the fire and smoke.</p> <p>16 It is, we respectfully submit, important to 17 recognise that the inquiry is very different from 18 adversarial litigation. Precisely because it is 19 independent and performs an inquisitorial function and 20 has its own independent experts, there is or may be less 21 of a need for it to hear evidence from experts 22 instructed on every individual business or corporate 23 body that may have an interest in the outcome of the 24 inquiry or the criminal investigation. Indeed, it is 25 simply not safe or practicable to allow unfettered</p> <p style="text-align: center;">Page 38</p>	<p>1 Allen/Irvine Thanvi Natas by MR FRIEDMAN QC 2 MR FRIEDMAN: Thank you, chairman.</p> <p>3 I'm Danny Friedman. I appear here today with 4 Liz Davies, and I speak from the group submission served 5 on behalf of the core participants represented by 6 Bhatt Murphy, Bindmans, Hickman & Rose, 7 Hodge, Jones & Allen and Irvine Thanvi Natas. Those 8 submissions, like all of the submissions today that are 9 written, will be on your website.</p> <p>10 You've already referred this morning to the helpful 11 agenda that was sent through by Birnberg Peirce, where a 12 group of core participants' lawyers, who are going to 13 hear from I think until about 3.45 or 4 o'clock today, 14 have divided up and distributed the matters that each of 15 us will lead on to avoid duplication, but also to ensure 16 that you hear different voices and different 17 perspectives on behalf of the hundreds of people who 18 lived, survived and in 71 known cases died in 19 Grenfell Tower.</p> <p>20 SIR MARTIN MOORE-BICK: Is it your plan to deal with the 21 first item on what I've called the Birnbergs agenda?</p> <p>22 MR FRIEDMAN: I am going to deal with the purpose of inquiry 23 and building confidence in its process, which is item 1, 24 the division between the so-called two phases and the 25 task of taking statements from survivors and the</p> <p style="text-align: center;">Page 40</p>

<p>1 bereaved.</p> <p>2 SIR MARTIN MOORE-BICK: Very good. All right. Thank you.</p> <p>3 MR FRIEDMAN: Sir, with you as the chair, with your inquiry</p> <p>4 team, your assessors and we hope some other eminent</p> <p>5 women and men who will sit with you on a panel, we are</p> <p>6 here to publicly find out why this tragedy happened and</p> <p>7 who or what was responsible.</p> <p>8 If I turn to the purpose of the inquiry, I want to</p> <p>9 focus, if I may, on article 2 of the European Convention</p> <p>10 on Human Rights.</p> <p>11 You, sir, have previously spoken about the anger,</p> <p>12 frustration and the sense of injustice that our clients</p> <p>13 understandably labour under. Your counsel in their</p> <p>14 public statement have referred to the need to provide</p> <p>15 a voice to those who have been personally affected by</p> <p>16 the fire and to make sure that those who have suffered</p> <p>17 are fully involved.</p> <p>18 These sentiments are welcome and of course morally</p> <p>19 and rationally sound, but they also reflect the law of</p> <p>20 human rights. There are minimum requirements to</p> <p>21 investigate when an event of mass casualty and suffering</p> <p>22 occurs, especially one of these proportions. This is</p> <p>23 recognised at a European level in article 2 of the</p> <p>24 European Convention on Human Rights. This inquiry is</p> <p>25 therefore required by section 6 of the Human Rights Act</p> <p style="text-align: center;">Page 41</p>	<p>1 that brings us before you.</p> <p>2 Put simply, the survivors and the bereaved must be</p> <p>3 placed at the centre or heart of this process. That</p> <p>4 does not mean that you should be biased in their favour,</p> <p>5 they do not want that, and it does not mean that you</p> <p>6 should treat those who could be criticised in an unfair</p> <p>7 fashion. Far from it. But you must put the survivors</p> <p>8 and the bereaved at the centre of the process because</p> <p>9 that is where the law requires them to be.</p> <p>10 One of the foundation cases for the proposition</p> <p>11 I just made is a case called El-Masri v The Former</p> <p>12 Yugoslav Republic of Macedonia. The grand chamber of</p> <p>13 the European Court of Human Rights adopts and endorses</p> <p>14 the restorative justice case law that was decided in the</p> <p>15 American Court of Human Rights in the 1990s and refers</p> <p>16 to the victims and the next of kin as having the right</p> <p>17 to the truth. It is a right that they enjoy in their</p> <p>18 own capacity and it is a right they enjoy as</p> <p>19 representatives of the public.</p> <p>20 Which marries up with a leading case in the</p> <p>21 United Kingdom, perhaps the leading case, Lord Bingham</p> <p>22 in a case called Amin in the House of Lords, where he</p> <p>23 said that the purpose of the investigative function is</p> <p>24 to ensure, so far as possible, that the full facts are</p> <p>25 brought to light, that culpable and discreditable</p> <p style="text-align: center;">Page 43</p>
<p>1 to act compatibly with that law.</p> <p>2 So that there will be no misunderstanding, these</p> <p>3 rights are now recognised at a global level, the same</p> <p>4 rights can be found in article 6 of the UN Covenant On</p> <p>5 Civil and Political Rights, they form part of customary</p> <p>6 international law or the law of nations and all peoples.</p> <p>7 So section 1 of the Inquiries Act 2005, which provides</p> <p>8 the foundation for this inquiry, is one of the means</p> <p>9 through which the United Kingdom will comply with that</p> <p>10 law.</p> <p>11 The basic requirements for an investigation will be</p> <p>12 known to the lawyers in the room. They may also be</p> <p>13 obvious as a reflection of basic decency and humane</p> <p>14 treatment. But let me recall, sir, those five core</p> <p>15 features, because everyone you hear from today and quite</p> <p>16 possibly tomorrow will no doubt be guided by them.</p> <p>17 The process must be: (1) independent; (2) thorough;</p> <p>18 (3) public; (4) sufficiently transparent and inclusive</p> <p>19 to enable effective participation by the survivors and</p> <p>20 the bereaved; and (5) prompt.</p> <p>21 All of that must combine to ensure accountability</p> <p>22 and, where justified, attribution of responsibility.</p> <p>23 Because we're talking about rights, these are not</p> <p>24 mere rules that must be complied with, but foundational</p> <p>25 values that should be the anchor for the whole endeavour</p> <p style="text-align: center;">Page 42</p>	<p>1 conduct is exposed and brought to public notice, that</p> <p>2 suspicion of deliberate wrongdoing if unjustified is</p> <p>3 allayed, that dangerous practices and procedures are</p> <p>4 rectified and that those who have lost their relatives</p> <p>5 may at least have the satisfaction of knowing that</p> <p>6 lessons learnt from his or her death may save the lives</p> <p>7 of others.</p> <p>8 These purposes are not just about practical</p> <p>9 lesson-learning and uncovering wrongdoing, but also, we</p> <p>10 say, something more profound. I am repeatedly told and</p> <p>11 I have seen that the overriding thing that our clients</p> <p>12 seek right now is a restoration of respect for their</p> <p>13 human dignity. That is to say that the task must not</p> <p>14 just be to discover technical matters that caused and</p> <p>15 spread this fire, but to promote the dignity and</p> <p>16 equality of those who have suffered from it. That is</p> <p>17 what the beginnings of justice would look like. They</p> <p>18 want the dignity that they have shown to be mirrored</p> <p>19 back to them.</p> <p>20 Which brings us to the question of how to build</p> <p>21 confidence in this inquiry and make it relevant to the</p> <p>22 recovery and raw grief and trauma of its central core</p> <p>23 participants.</p> <p>24 Sir, that's not simply your responsibility or the</p> <p>25 responsibility of your counsel team; it's the</p> <p style="text-align: center;">Page 44</p>

<p>1 responsibility of everyone who comes here before you. 2 You cannot learn at school, college or university or any 3 area of working life, law or otherwise, how best to 4 conduct the Grenfell Tower inquiry. There is no 5 substitute for being endlessly curious about what is 6 required, most of all from the people who live through 7 it. We've heard today, importantly, that there is 8 sympathetic engagement with the matters that have been 9 raised and we are beginning a dynamic and open-minded 10 conversation. 11 But there are confidence-building issues and we have 12 set them out in paragraph 7 of our submissions, in the 13 spirit that the best way to join forces in meeting those 14 issues is to voice them and to work on their solutions. 15 We called them seven concerns; let me call them 16 confidence-building issues. 17 Issue number 1 is that the bereaved, the people in 18 grief who have served a traumatic and wholly unexpected 19 loss, do not, as yet, have any formal recognised status 20 in the process at all. I noted the words used today, 21 but in the counsel to the inquiry's public statement 22 they were subsumed under the categories of residents or 23 those who speak for those who are unable to participate 24 in the inquiry, which means that they are not as yet 25 properly recognised as persons entitled to effective</p> <p style="text-align: center;">Page 45</p>	<p>1 bereaved relatives relating to 47 deceased people, of 2 which 10 were children. As a matter of law and basic 3 compassion, those people need to know that they will not 4 have to go through another process after this. 5 Confidence issue number 2 is that the core 6 participants will be treated as mere vehicles for 7 providing evidence and their crucial participatory role 8 marginalised. 9 Your counsel have in writing said they want them to 10 be fully involved, they've said it again today, but how 11 the full involvement will work, in a manner that is 12 effective, equal and inclusive, is what we are now here 13 starting to design. But if your team -- and I say this 14 with respect, but it needs to be said to be resolved -- 15 writes letters asking for views on any matter, be it 16 experts, the law or procedures, none of us will reply 17 until we are satisfied that we can do so on instructions 18 from our clients. We serve our clients, they don't 19 serve us. In Mr Stein's words later on: this cannot be 20 or seem to be a mere conversation between lawyers. 21 Confidence issue number 3, disclosure. 22 The fear is that it will be late, limited, and with 23 insufficient funding or time to read and consider. Now, 24 Mr Weatherby will address this as an issue in detail 25 later. For our part, it's essential to add that there</p> <p style="text-align: center;">Page 47</p>
<p>1 participation in their own right. Given all that I've 2 said to you about the fundamental human rights legal 3 framework, you could say something quite soon which 4 would make a tangible difference in terms of promoting 5 the dignity of that situation and assisting their grief. 6 But there's a more formal issue to resolve, if 7 I may. The inquiry must fulfil the function of the 8 inquest. The setting up of an inquiry produced 9 an important public debate about the difference between 10 the two types of proceedings. The reason why it was 11 important to have a public inquiry is that it is capable 12 of conducting a broader investigation than an inquest 13 and resolving more issues. That said, it would be 14 terrible if, at the end of this process, the inquiry had 15 not done what an inquest would do, which is to record 16 who, how and in what circumstances each person died. 17 However you structure the phases or modules or 18 whatever we will call them, by the end of them we would 19 not want bereaved families to have to go through 20 an inquest in addition to what you have done. The 21 inquests have been formally adjourned, but article 2 of 22 the convention requires the investigation, whatever form 23 it takes, to be conducted promptly. The inquiry 24 therefore must complete this work. 25 Sir, today I am standing before you on behalf of 62</p> <p style="text-align: center;">Page 46</p>	<p>1 should be at least preliminary disclosure of general 2 materials and what you call materials from phase 1 and 3 phase 2 as soon as possible. 4 We do not need to wait for everything to begin, and 5 what can be made available while we wait for everything 6 can be done in tranches. In the annex of our 7 submission, we have isolated by way of draft suggestions 8 some core items, such as the housing files, which I'll 9 come if to I may, 999 calls and emergency response logs 10 that would enable everyone to begin. That list is 11 a draft work in progress. We have also seen a helpful 12 breakdown of the standard emergency response documents 13 provided by the Fire Brigades Union in the core 14 submissions for today, and that makes clear what could 15 be disclosed to all parties near enough straight away. 16 So, with group discussion, we can work with your 17 team to enable everyone to start on these core materials 18 soon. One of the things that is aggravating the 19 suffering is delay. So the sooner the disclosure can 20 begin on some things, the quicker some of that 21 aggravation can be removed. 22 SIR MARTIN MOORE-BICK: Is that something on which 23 discussions with the inquiry team could take things 24 forward? 25 MR FRIEDMAN: Indeed, I believe they could. I don't on my</p> <p style="text-align: center;">Page 48</p>

<p>1 feet want to design the discussion process, but I think</p> <p>2 I can speak for many representatives of core</p> <p>3 participants that for us to work together and of course</p> <p>4 consult with our clients while those discussions go on</p> <p>5 would take things forward, I believe.</p> <p>6 SIR MARTIN MOORE-BICK: Yes, thank you.</p> <p>7 MR FRIEDMAN: Confidence issue number 4, please. Hearings</p> <p>8 will be conducted exclusively by your counsel and you,</p> <p>9 rendering the core participants passive attendees, able</p> <p>10 only to give their own evidence, if asked, and to</p> <p>11 suggest questions but never to ask them.</p> <p>12 Well, we want to ask questions on behalf of our</p> <p>13 clients. That could be done at inquest, so it should be</p> <p>14 done here. But it must also be done in a way that saves</p> <p>15 time and avoids repetition. Yet there will be occasions</p> <p>16 when someone might wish to ask questions on the same</p> <p>17 point from a different perspective, sometimes we will</p> <p>18 seek to test controversial evidence ourselves and</p> <p>19 sometimes, sir, we will want to give a client the</p> <p>20 experience that the lawyer they trust was able to ask</p> <p>21 a question that is essential to them, something that</p> <p>22 goes to the heart of their grief.</p> <p>23 From that, can I just deal with the issue of witness</p> <p>24 statements and giving evidence. Because in this</p> <p>25 context, we and the barristers who are going to follow</p> <p style="text-align: center;">Page 49</p>	<p>1 provisional disclosure, which we've already touched</p> <p>2 upon, to make sure that clients are not giving</p> <p>3 an unsighted account without the basic assistance of</p> <p>4 seeing the emergency logs, the 999 calls, the videos,</p> <p>5 et cetera.</p> <p>6 I want to say something about housing records. In</p> <p>7 social housing, the housing file is an essential record</p> <p>8 of who that resident is and who is in their household.</p> <p>9 It details their personal characteristics, age,</p> <p>10 disability, children, and everything about the people</p> <p>11 who are living with them. So it helps us to know our</p> <p>12 clients and advise them, but it helps you to know who</p> <p>13 was living in Grenfell Tower as of the night of 14 June.</p> <p>14 It's not the complete answer -- you know that -- but it</p> <p>15 is an absolutely fundamental answer, and this has been</p> <p>16 touched upon by those who instruct me and other</p> <p>17 solicitors have spoken about it.</p> <p>18 The statements, even if, in Mr Millett's helpful</p> <p>19 description, they are a narrow, first attempt that can</p> <p>20 be preliminary, can be held off to deal with what</p> <p>21 happened on the night, are nevertheless capable of being</p> <p>22 referred to in later criminal proceedings, civil claims,</p> <p>23 housing proceedings, and others may have to deal with</p> <p>24 them in immigration proceedings. It is not right,</p> <p>25 therefore, to ask people to give an account about the</p> <p style="text-align: center;">Page 51</p>
<p>1 on from me are assisting the bereaved, survivors and</p> <p>2 ordinary local people who knew how unsafe the building</p> <p>3 was as of that night and tried to make a difference.</p> <p>4 None of them are state agents or employees or leaders or</p> <p>5 corporate organisations. They do not have a system,</p> <p>6 union or company to support them. Many of them are in</p> <p>7 acute need of support because they were left with</p> <p>8 nothing save often physical and psychological injury.</p> <p>9 Both Sam Stein and Fiona Murphy are going to add to</p> <p>10 this later. We've dealt with it in paragraphs 11 to 13</p> <p>11 of our submissions.</p> <p>12 Just briefly, the first point is that the aim to</p> <p>13 publish a permanent testimony of what has been lost by</p> <p>14 the tragedy is hugely invaluable.</p> <p>15 Secondly, we understand that the inquiry wants</p> <p>16 statements from the residents regarding the fire itself,</p> <p>17 but that there will be flexibility to supplement those</p> <p>18 statements in relation to any fresh evidence disclosed</p> <p>19 and in relation to later issues that will be dealt with.</p> <p>20 Thirdly, there will be different ways to give and</p> <p>21 publish our clients' evidence, including providing</p> <p>22 special measures for video link or perhaps playing a</p> <p>23 video of our statement, and pastoral care for witnesses</p> <p>24 that need it inside an inquiry room and outside.</p> <p>25 Fourthly, there needs to be agreement about the</p> <p style="text-align: center;">Page 50</p>	<p>1 most significant night of their lives whilst they are</p> <p>2 still in trauma without their lawyers having access to</p> <p>3 this basic information and without them being</p> <p>4 sufficiently informed in order to give the appropriate</p> <p>5 advice.</p> <p>6 Fifth point on statements, and Mr Stein in</p> <p>7 particular will develop this. Sir, I think you'll be</p> <p>8 surprised, as others have been, about how challenging it</p> <p>9 is to take the statements and the need to provide</p> <p>10 a great deal of care to the people who are being asked</p> <p>11 to give them.</p> <p>12 On a very provisional basis, taking into account the</p> <p>13 unknowns, et cetera, we've written to you separately to</p> <p>14 say that two days per core participant is at least what</p> <p>15 is needed, and after the disclosure has taken place, at</p> <p>16 least for the first tranche of statements, it's going to</p> <p>17 take about eight weeks. It would be wrong to become</p> <p>18 concrete today. It gives you a ballpark figure.</p> <p>19 Confidence issue number 5. The inquiry will get</p> <p>20 bogged down in the technical question of how and not</p> <p>21 move quickly enough to the question of why. This is</p> <p>22 relevant to whether an inflexible division of phase 1</p> <p>23 and 2 with an enforced hiatus in order to produce</p> <p>24 an interim report would be positively counterproductive.</p> <p>25 Now, Mr Mansfield is going to take this up, but in</p> <p style="text-align: center;">Page 52</p>

<p>1 headline form there are two potential problems: (1) 2 delayed reporting on matters relevant to fire safety in 3 tower blocks, and (2) artificially investigating the 4 response of the Fire Brigade by separating key issues of 5 how and why between two phases. 6 We've dealt with this in our submissions at 7 paragraph 15 to 17. It is noteworthy that both the Fire 8 Brigades Union and the London Fire Brigade are concerned 9 about the exact same artificiality of the split. 10 Can I just make two observations about this. 11 Firstly, the firefighting strategies on the night do 12 not logically in many cases fit into phase 2 on the 13 current plan, and there are some obvious omissions, most 14 significantly being the fatal effects of people being 15 told to stay put once the external parts of most of the 16 building were ablaze. 17 The second thing to add, it is important, with 18 respect, for you, sir, to keep an open mind about how 19 and when the inquiry can report on technical issues or 20 otherwise make provisional observations about matters 21 arising from the evidence. The advantage of the public 22 inquiry mechanism is that you can do that in different 23 ways at different times. 24 So the discovery of dangerous material or the 25 existence of a dangerous practice does not require you</p> <p style="text-align: center;">Page 53</p>	<p>1 MR FRIEDMAN: Indeed, and, if I may so -- and I don't want 2 to go into any example now today for obvious reasons -- 3 if there's an elephant in the room, you should just say 4 it's an elephant rather than spending three to four 5 weeks talking about something with a long trunk, tusks 6 and the like. Please don't let phases delay you in 7 declaring the obvious or using case management powers to 8 narrow the issues so that we get to the why. 9 Confidence issue number 6 of 7. Nearly done. The 10 human experience of the core participants, including 11 their backgrounds, their difficulties and their 12 suffering will not be properly understood. 13 We have to get to know our clients so that we can 14 enable you to know them. That's our job. But they have 15 to have the confidence and trust in the process in order 16 to believe that the difficult work that they will be 17 asked to do is both worthy and relevant to their 18 recovery. 19 Others are going to address you on extending the 20 diversity and inclusiveness of the panel, Mr Mansfield 21 Mr Thomas and Ms Munroe. There can be little doubt that 22 to do so would have a paradigm-shifting positive 23 consequence in terms of confidence. 24 There are lots of different reasons to explain why 25 that is so. Grenfell Tower was a beautifully diverse</p> <p style="text-align: center;">Page 55</p>
<p>1 to wait for the end of phase 1 or indeed phase 2 in 2 order to act. Nor must the state and corporate core 3 participants necessarily wait themselves. There are 4 many instances in inquests and inquiries where the 5 authority serves statements saying they have already 6 decided to change a practice and explain why. So you 7 could make their change of practice public and provide 8 provisional endorsement as to why you agree with their 9 stance from what you presently know. 10 Equally, when your counsel make opening statements 11 or the state or core participants are asked to open 12 themselves, they could invite you to reach a certain 13 conclusion immediately. Furthermore, if you reached 14 a decision that something was unsafe during the course 15 of evidence, you could issue a provisional analysis to 16 that effect and invite submissions or carry out 17 a focused hearing to discover whether you were wrong. 18 Coroners, under their legislation, can produce 19 prevention of future death reports at any time and 20 accordant submissions from those who are responsible or 21 involved in those recommendations would be heard before 22 they were finalised. 23 SIR MARTIN MOORE-BICK: So is your message: keep it flexible 24 and see where the investigation leads and report on 25 important things as and when you come across them?</p> <p style="text-align: center;">Page 54</p>	<p>1 place to live. Diversity improves the quality of any 2 institution, but especially a public inquiry committed 3 to hearing those diverse voices. Justice is not just 4 about outcomes; it's also about the process and journey 5 that gets you to the outcomes. 6 Please recall why this inquiry was established in 7 the first place: to allay acute public anxiety that 8 concerns had gone unheard and uncared for. The question 9 therefore is not what an objective, informed bystander 10 would say about you as the chair being able to reach 11 independent findings. That's the wrong question, if 12 I may say so, not one that I raise. The right question 13 for the objective, informed bystander to answer 14 is: what, in this extraordinary situation of loss of 15 confidence and mistrust, would be justified to restore 16 those very things? To which the answer would be: the 17 fire was a disaster of mass fatality, near death, 18 homelessness and people left destitute. The inquiry 19 into the fire not only deserves the chairmanship of 20 an eminent retired senior judge; it deserves more. 21 Confidence issue number 7, and to conclude. 22 A process that could provide transitional justice will 23 become irrelevant to and even hinder the core 24 participants' post-trauma recovery. Much of that has 25 been dealt with on what I've said on issues 1 to 6.</p> <p style="text-align: center;">Page 56</p>

<p>1 Sir, I realise that it may be daunting, but as</p> <p>2 a judge, you are being asked to be more than a judge and</p> <p>3 to decide more than a case. That is why the solutions</p> <p>4 suggested by your counsel and in the various submissions</p> <p>5 before you today are so important to get right and to</p> <p>6 correct if original decisions prove not to be the best</p> <p>7 ones.</p> <p>8 We are not in litigation. We are building</p> <p>9 an inquiry. Sir, what people want is something that can</p> <p>10 be a proud and positive example of justice and equality</p> <p>11 in 21st century Britain, a lodestar of dignity, if you</p> <p>12 will, and there is no false promise or naivety in making</p> <p>13 that the aim that guides us all.</p> <p>14 Thank you.</p> <p>15 SIR MARTIN MOORE-BICK: Thank you very much. Some very good</p> <p>16 points to think about there. Thank you.</p> <p>17 Mr Mansfield, I think you are next on the running</p> <p>18 order.</p> <p>19 Submissions on behalf of core participants represented by</p> <p>20 Birnberg Peirce/Saunders Law/Hanover Bond Law</p> <p>21 by MR MANSFIELD QC</p> <p>22 SIR MARTIN MOORE-BICK: I gather you had some difficulty</p> <p>23 getting here this morning.</p> <p>24 MR MANSFIELD: I'm afraid so. I don't live in London</p> <p>25 anymore and it was touch and go. Fortunately more touch</p> <p style="text-align: center;">Page 57</p>	<p>1 some overlap.</p> <p>2 May I just follow on from Mr Friedman's emphasis on</p> <p>3 the Human Rights Act by not repeating that but by</p> <p>4 coming, perhaps, to a focal point today.</p> <p>5 I think everyone in the room recognises that there's</p> <p>6 a watershed opportunity here today, with you, to make</p> <p>7 a real difference to what is perceived to be,</p> <p>8 unfortunately, a process which has become disengaged.</p> <p>9 In many respects, it's no individual's fault, but it</p> <p>10 often happens that things fall by the wayside unless</p> <p>11 it's grasped at an initial stage. Mr Friedman just</p> <p>12 touched on it, but one recognises that the first stage</p> <p>13 at which public confidence was shaken was actually the</p> <p>14 fire itself, because it's a national -- I've used the</p> <p>15 word before -- atrocity, and in that sense one asks the</p> <p>16 rhetorical and vernacular question: how on Earth, in the</p> <p>17 21st century, in one of the richest boroughs of the</p> <p>18 United Kingdom, can a block like this just go up in</p> <p>19 flames with so many casualties involved?</p> <p>20 I do of course include those who died in the block,</p> <p>21 but the casualties are far greater than that, that is</p> <p>22 the people who live around the immediate vicinity, but</p> <p>23 far greater than that, because everyone who lives in</p> <p>24 a tower block will have been affected by that. In fact,</p> <p>25 everybody has a collective responsibility, and that is</p> <p style="text-align: center;">Page 59</p>
<p>1 than going the end.</p> <p>2 SIR MARTIN MOORE-BICK: Thank you for making the effort to</p> <p>3 be here in time for the start. Thank you.</p> <p>4 MR MANSFIELD: Thank you.</p> <p>5 It's clear, or at least I ought to make it clear,</p> <p>6 that I represent obviously more than one firm. I am</p> <p>7 here representing Birnberg Peirce, a second firm,</p> <p>8 Saunders Law, and a third, Hanover Bond Law.</p> <p>9 Altogether, they constitute 24 different families and</p> <p>10 44 different individuals, including children.</p> <p>11 We've made a sincere effort and a detailed effort on</p> <p>12 behalf of the bereaved and the survivors and the</p> <p>13 residents. All of those, that's the solicitors and the</p> <p>14 barristers, have been co-operating over the last few</p> <p>15 months, in fact, to ensure that the breadth of</p> <p>16 representation in terms of spoken as well as written</p> <p>17 representations are made in a co-ordinated way so that</p> <p>18 they dovetail and therefore reflect what the desires are</p> <p>19 of the people we represent.</p> <p>20 You will see from the list that was sent to you in</p> <p>21 advance the considerable achievement that has been made</p> <p>22 with that regard, and may I assure you that that</p> <p>23 endeavour will continue so that you have no fears that</p> <p>24 you'll be facing a phalanx of the same arguments.</p> <p>25 That's just not going to be the case. But there will be</p> <p style="text-align: center;">Page 58</p>	<p>1 the way in which, in a sense, the system was shaken at</p> <p>2 that point. Everybody said to themselves: well, if it</p> <p>3 can happen to them, it can happen to me.</p> <p>4 Therefore, the need to generate and regenerate trust</p> <p>5 began the moment the fire took place. But there is</p> <p>6 a slight reflection backwards, which I mention at this</p> <p>7 stage. I know it's in the list of issues, but this had</p> <p>8 been predicted, or at least the danger of fire had been</p> <p>9 predicted. So even before the fire, people who lived in</p> <p>10 the block -- and it's a very, you have heard, diverse</p> <p>11 community in its own right -- as well as neighbouring</p> <p>12 blocks had actually made warnings, given warnings of</p> <p>13 this kind of thing, and I just want to quote what the</p> <p>14 Prime Minister said when these matters had just happened</p> <p>15 and were fresh in everybody's mind, and these are</p> <p>16 important words said by the Prime Minister at that time,</p> <p>17 22 June to the House of Commons. It's this essence of</p> <p>18 confidence that needs to be regenerated. She said this:</p> <p>19 "For too long residents have been overlooked and</p> <p>20 ignored."</p> <p>21 So it's not just the residents saying it, it's not</p> <p>22 just the bereaved saying it, here you have the</p> <p>23 Prime Minister saying it:</p> <p>24 "We will ensure they are involved in every step of</p> <p>25 this process. No stone will be left unturned in this</p> <p style="text-align: center;">Page 60</p>

<p>1 inquiry."</p> <p>2 We move from the fire, from a community that had</p> <p>3 been ignored, to what was going to happen thereafter.</p> <p>4 Well, what has happened thereafter to some extent</p> <p>5 has not restored the confidence. Whether it is by</p> <p>6 oversight or any other reason, there is a distinct</p> <p>7 feeling, today, that they have not -- that is those</p> <p>8 people most affected -- been included. So the</p> <p>9 restoration of public confidence generally and the</p> <p>10 restoration of confidence by those most affected, as</p> <p>11 claimed by the Prime Minister, are yet to be fully</p> <p>12 engaged.</p> <p>13 Now, some of the points have already been made,</p> <p>14 I don't repeat those, but I want to concentrate on one</p> <p>15 of the ways in which that trust, the integrity of the</p> <p>16 process being, as it were, put back in the centre along</p> <p>17 with the bereaved, is in fact to look at the</p> <p>18 decision-making process that has been going on.</p> <p>19 We say that the decision-making process cannot be</p> <p>20 left to one person. It should be reflective of the</p> <p>21 community and, to some extent, the public at large for</p> <p>22 there to be at the end of the day confidence in the</p> <p>23 findings. You yourself cannot be expected to reflect</p> <p>24 the diversity in one person. No one person on Earth</p> <p>25 could do that. And the way that the families will, as</p> <p style="text-align: center;">Page 61</p>	<p>1 otherwise it's very difficult to take decisions, so we</p> <p>2 would submit either another two or another four --</p> <p>3 I have experience of the Macpherson Inquiry where in</p> <p>4 fact there were four others, so it had a total of five,</p> <p>5 it was much easier, one understands to take decisions in</p> <p>6 those circumstances -- and that would then begin to</p> <p>7 satisfy some of the problems that are perceived by the</p> <p>8 families that exist at the moment.</p> <p>9 Now, obviously, if one of the additional panel</p> <p>10 members could have an expertise or a reflection of the</p> <p>11 community -- some families would like to make some</p> <p>12 contribution to that, in other words make suggestions as</p> <p>13 to who the panel member might be. But, as you've read</p> <p>14 all the paperwork, I am not going to do very much more</p> <p>15 than just a brief reference to a report that</p> <p>16 Birnberg Peirce had commissioned, I think you've seen</p> <p>17 it, Dr Marie Stewart's report.</p> <p>18 SIR MARTIN MOORE-BICK: I did see that and I did read it,</p> <p>19 yes.</p> <p>20 MR MANSFIELD: I just refer to two paragraphs, that's all,</p> <p>21 perhaps when you have a moment to re-read them. It's</p> <p>22 paragraph 7 in section B of the report, and particularly</p> <p>23 paragraph 8, where she talks about the diversity of the</p> <p>24 tower and the different backgrounds and the sort of</p> <p>25 issues that will be raised in relation to this inquiry</p> <p style="text-align: center;">Page 63</p>
<p>1 it were, be encouraged to respond and engage is if they</p> <p>2 see, alongside yourself -- we've called it a panel.</p> <p>3 May I just say there's been considerable confusion</p> <p>4 in the public domain between panel members and</p> <p>5 assessors, and that continues to this day. They are</p> <p>6 obviously different. I'll spell it out so it's clear</p> <p>7 what we're asking for at this stage.</p> <p>8 Now, we appreciate that you're not in a position to</p> <p>9 appoint panel members, but what we are asking is that if</p> <p>10 at this juncture -- and it's not a matter that I've</p> <p>11 raised today for the first time, as you well know I did</p> <p>12 write along these lines many, many months ago -- the</p> <p>13 Prime Minister, who is also being addressed by these</p> <p>14 submissions, we've sent the same points to her, and she</p> <p>15 said in September to the House of Commons that the</p> <p>16 matter was then, in September, "under review", were the</p> <p>17 words she used.</p> <p>18 So we hope, genuinely hope, that it is still under</p> <p>19 review, and if it is, you have today the support of</p> <p>20 the families to, as it were, ask the Prime Minister --</p> <p>21 it may be you can't go much beyond a request -- that in</p> <p>22 fact she consider as soon as possible, and now there is</p> <p>23 a different time frame to the one that existed before,</p> <p>24 there is now time for you to be accompanied by -- one is</p> <p>25 looking at figures here. It's got to be a odd number</p> <p style="text-align: center;">Page 62</p>	<p>1 beyond the technical but dealing with their own</p> <p>2 experiences, are all spelt out there. I'm not going to</p> <p>3 read it out; it's all there for you to see.</p> <p>4 Paragraphs 12 and 13. Perhaps the initial sentence</p> <p>5 of 13 is important:</p> <p>6 "This inquiry will be required to take account of</p> <p>7 human factors ..."</p> <p>8 Same point that has been made before:</p> <p>9 "... where diversity is central to the matters under</p> <p>10 investigation. Particularly relevant will be issues 7,</p> <p>11 governance, 8, communication ..."</p> <p>12 Just to give an illustration of how you communicate</p> <p>13 the fire safety measures to the people who are there</p> <p>14 when you have a diverse community, what warnings were</p> <p>15 given and what was the reception of their communications</p> <p>16 about their difficulties.</p> <p>17 "... 9, fire advice [of course, same point], 12,</p> <p>18 response of the emergency services and 13, the</p> <p>19 aftermath."</p> <p>20 The aftermath, just pausing for a moment, is</p> <p>21 a matter that is easily spoken, aftermath, but of course</p> <p>22 it's massive here. One of the big questions will be</p> <p>23 whether there were contingency plans, and, if there</p> <p>24 weren't, why weren't they in place to deal with</p> <p>25 something like this?</p> <p style="text-align: center;">Page 64</p>

<p>1 Perhaps the biggest contingency that's been</p> <p>2 overlooked or at least marginalised, it hasn't had</p> <p>3 centre stage until the last two months when eventually</p> <p>4 it surfaced, is mental health in relation to it. It's</p> <p>5 not just, therefore, people who died but the ones who</p> <p>6 continue to be suffering under the stress and trauma of</p> <p>7 what has happened.</p> <p>8 Therefore, there are other comparisons made with --</p> <p>9 which I don't go through -- the Macpherson/Lawrence</p> <p>10 Inquiry and the benefits of having more than one</p> <p>11 person helping to decide the various facets. Of course,</p> <p>12 Macpherson was dealing with a very wide range of issues,</p> <p>13 just as we are here.</p> <p>14 So I pause for a moment. That's the issue we would</p> <p>15 ask that perhaps you make a recommendation after today</p> <p>16 in relation to that particularly important aspect.</p> <p>17 SIR MARTIN MOORE-BICK: Before you leave that, can you just</p> <p>18 help me on one thing? I think you recognise that</p> <p>19 whether to appoint other people to a panel is for the</p> <p>20 Prime Minister.</p> <p>21 MR MANSFIELD: Yes.</p> <p>22 SIR MARTIN MOORE-BICK: Do you think it would be of any</p> <p>23 value if the inquiry were to try to put together</p> <p>24 a consultative panel of local people? Not</p> <p>25 decision-making panel but a panel who could talk to the</p> <p style="text-align: center;">Page 65</p>	<p>1 notice how much longer I've got.</p> <p>2 SIR MARTIN MOORE-BICK: I think you've got a little while</p> <p>3 because those ahead of you have been quite economical.</p> <p>4 MR MANSFIELD: I wonder if that's a hint. I'll keep it</p> <p>5 short. As short as I can.</p> <p>6 May I pass to a second area which is on the list and</p> <p>7 has been referred in to passing by Mr Friedman, namely</p> <p>8 the division or structure in which the inquiry is</p> <p>9 seeking to go ahead.</p> <p>10 The word "robust" has been used. I'm going to apply</p> <p>11 it to what I have to say in relation to this, because</p> <p>12 our submission is that you re-visit this whole issue.</p> <p>13 I don't know when it was first envisaged but, whenever</p> <p>14 it was, it was a much earlier stage and it was</p> <p>15 understandable at the beginning because everybody was</p> <p>16 saying, "Let's have a quick answer to this so we can do</p> <p>17 something about it", putting it again shortly.</p> <p>18 If you just reflect on what's happened in the past,</p> <p>19 a number of the people sitting here today, along with</p> <p>20 myself, were involved in Hillsborough. Now, what</p> <p>21 happened there is of interest because 96 people -- so</p> <p>22 it's not substantially different, a very complicated</p> <p>23 situation and so forth -- but the Taylor Inquiry, which</p> <p>24 I'm sure you are familiar with, got off the ground very</p> <p>25 quickly indeed; in fact, within a month or so of the</p> <p style="text-align: center;">Page 67</p>
<p>1 inquiry and receive information from the inquiry and</p> <p>2 become to that extent more involved? Would that be</p> <p>3 helpful?</p> <p>4 MR MANSFIELD: It would be helpful. May I just say, I think</p> <p>5 that is a concept that has been employed in the child</p> <p>6 abuse inquiry and has proved to be successful with the</p> <p>7 meeting of the individuals concerned, as well as</p> <p>8 experts, as well as lawyers, so it's a multi-faceted</p> <p>9 situation in which the panel represents in that way.</p> <p>10 But I think the core point we make is, whether you</p> <p>11 have more assessors, more experts or a consultative</p> <p>12 panel, at the end of the day, who is taking the</p> <p>13 decision? That is the key point.</p> <p>14 SIR MARTIN MOORE-BICK: Yes.</p> <p>15 MR MANSFIELD: Because, of course, the decision-maker would</p> <p>16 be quite entitled to say in their discretion, if there's</p> <p>17 more than one, "We don't accept the advice, we don't</p> <p>18 accept that", or, "We accept something else". They are</p> <p>19 the decision-makers. That's what matters to</p> <p>20 the families, that the decision-makers they have</p> <p>21 confidence in will reflect the sort of matters that</p> <p>22 Dr Stewart refers to in her report. So it would help</p> <p>23 but I'm afraid it doesn't quite solve it.</p> <p>24 SIR MARTIN MOORE-BICK: All right, thank you very much.</p> <p>25 MR MANSFIELD: I'm keeping an eye on the clock. I didn't</p> <p style="text-align: center;">Page 66</p>	<p>1 disaster that happened there on the terraces in April.</p> <p>2 Within two months it was off the ground.</p> <p>3 The importance of it -- I'm only going to emphasise</p> <p>4 this one aspect -- was that the inquiry were conscious</p> <p>5 of the fact that, if they were going to make</p> <p>6 a difference, they'd have to report back to make changes</p> <p>7 to prevent further deaths, which is a matter that's come</p> <p>8 up in many people's submissions and today already</p> <p>9 orally. If you are going to prevent further deaths, you</p> <p>10 don't wait until October next year, which is a new</p> <p>11 timetable because you will remember you yourself thought</p> <p>12 it would be possible to get a report by Easter. So</p> <p>13 that's shifted.</p> <p>14 Again, no criticism of that; it's obvious that</p> <p>15 there's a lot to be considered. However, my point is</p> <p>16 that all of this contributes, unlike Hillsborough, where</p> <p>17 there were massive changes made to football grounds for</p> <p>18 the start of the season, all-seater stadiums and so on,</p> <p>19 I don't need to go through what happened, that time has</p> <p>20 passed. In fact, I don't want to be glib about the</p> <p>21 causes of the fire, but many of the families say, "Well,</p> <p>22 wait a minute, it's all on film, we can see what</p> <p>23 happened." Well, they can see an oversight of what</p> <p>24 happened. It's not the detail, obviously. But there</p> <p>25 is, as it were, an understanding that the fire may have</p> <p style="text-align: center;">Page 68</p>

<p>1 come from a particular part, particular item, may have 2 spread very fast through the cladding and so on. 3 So that isn't the big question. It's the big 4 question that I put at the beginning, namely the public 5 are saying: how could this have happened in this day and 6 age to that extent? So its that question. And, of 7 course, many local authorities have already addressed 8 the causes. 82 tower blocks, within about a month, by 9 the middle of July last year, in this country with 10 similar cladding failed the current fire safety tests. 11 So if I can put it again in the vernacular, people are 12 on to this already, and therefore the need for you is 13 still there to examine the precise causes but actually 14 not any longer to do what the Taylor Report had to do. 15 Therefore, we take a step back and say -- well, it's 16 Mr Friedman's question -- what is the purpose of the 17 inquiry? If it is in fact what the families want, 18 an identification of responsibility for the matters that 19 went wrong here -- and no one is doubting that things 20 did go badly wrong -- so they want accountability, 21 that's all part of the human rights aspect of this, how 22 are they best going to begin that process? In other 23 words, I am coming back to the overarching need for 24 public confidence and families' confidence. Not only 25 would that be reinstated by the panel, it would also be</p> <p style="text-align: center;">Page 69</p>	<p>1 about your performing the role of an inquest anyway, or 2 that's the suggestion. 3 So we say that that position has been countenanced 4 and overcome. But that's not the only one. Zeebrugge, 5 going back many years. The rail inquiries going back, 6 Clapham, Kings Cross and so on, they all happened at the 7 same time. So it's entirely possible for it to happen. 8 So we say, as a sort of policy issue, you and any 9 other panel members, if there are any appointed, can, as 10 it were, re-visit this on that basis, that there won't 11 be jeopardy, provided everybody acts responsibly, and 12 there's no suggestion here that those core participants 13 are going to act irresponsibly. There has been plenty 14 of time for any irresponsibility to be shown and it 15 hasn't been. Quite the opposite. 16 So may I move from the policy issue to why we say in 17 practice, practical terms, it's artificial division and 18 not seriously workable. 19 If I just look at, if I may, section B of your 20 counsel's statement, where at paragraph 20 he sets out 21 the issues, and you'll be very familiar with them, for 22 phase 1, the first one is an extremely important one: 23 the existing fire safety and prevention measures at 24 Grenfell Tower. Period. 25 Now, we say, as an example, others have given the</p> <p style="text-align: center;">Page 71</p>
<p>1 reinstated if they felt the question they most want 2 answered is going to be addressed sooner rather than 3 later. 4 Now, I pause again. There is an unspoken fear -- 5 well, sometimes articulated fear -- that were you to, as 6 it were, enter this arena, you would in some way or the 7 inquiry would be in some way jeopardising the police 8 inquiry that Mr Johnson has spoken about. 9 We are all conscious of that, the families included. 10 Nobody wants to jeopardise what the police are doing. 11 However, there is, as it were, a well-trodden path here. 12 It's happened before -- I can give you the 13 illustrations -- whereby the police investigation in 14 parallel with an inquiry and/or an inquest has taken 15 place, because of the undertakings that are given and 16 because the inquest no more than an inquiry has the 17 power to identify individuals and say somebody is 18 guilty. That's not the function of either of them. 19 Therefore, to that extent, that's not the conclusions 20 that overlap. One understands meanwhile that evidential 21 bases that are being looked at could overlap. 22 However, it was successfully overcome recently in 23 Hillsborough. There was a police inquiry going on at 24 the very same time and feeding into -- I appreciate it's 25 an inquest not an inquiry, although Mr Friedman's point</p> <p style="text-align: center;">Page 70</p>	<p>1 evacuation and in a sense splicing and dicing these 2 issues so that you don't deal with the stay-put 3 strategy, well, here on 5A is an extremely important, as 4 it were, area. We say it can't possibly be that 5 witnesses, whether they're experts or whether they're 6 members of the groups that we represent, the deceased, 7 the bereaved, survivors and residents -- is it to be 8 said that they come to the witness box and they can only 9 speak to their experiences on the night? I'm dealing 10 with it from the point of view of the families in 11 particular. It's artificial and unreal. Because we say 12 that -- and I can give you many illustrations from the 13 families themselves already, they haven't all put it 14 into words yet but they can do -- namely -- and I can 15 just say it, as it were, from the experience of speaking 16 to them -- the ones particularly who live there and who 17 have lived there, in one case, for 30 years, that 18 30-year experience means that when this particular 19 individual comes into this witness box, wherever it 20 happens to be at that time, he can only speak as to what 21 the effect was on his floor and so on, but he can't 22 speak about the fact that, for example, he will say, 23 "There have been fires there in Grenfell Tower before 24 but they've been contained. Why were they contained and 25 this one wasn't?"</p> <p style="text-align: center;">Page 72</p>

<p>1 Of course, when one gets into the detail, each and 2 every family are saying fire hoses, sprinklers, fire 3 doors, access for fire engines, car park out of use -- 4 they all were there, and it will be unreal for them to 5 have some cut-off point at which, "You can't speak about 6 that today, very sorry, come back again". Well, they 7 won't want to do that.</p> <p>8 If you are not going to, quite rightly, expect them, 9 given the trauma, to come back twice, it means that some 10 of those, and it's nearly all of them have got much more 11 to say -- sorry, yes, I pause.</p> <p>12 SIR MARTIN MOORE-BICK: I was going to say, you may recall 13 that our initial view on this was not only that people 14 should come and give evidence once only for the very 15 reason you've indicated, but they should give all their 16 evidence once only at the beginning.</p> <p>17 MR MANSFIELD: Yes.</p> <p>18 SIR MARTIN MOORE-BICK: But we were then told by many of 19 those that represent them that they didn't want to do 20 that. It was for that reason that we changed our view 21 and said, well, if you don't want to do it all at the 22 beginning, you can do the beginning at the beginning and 23 the rest later on. So we're really trying to be as 24 accommodating as possible and as flexible as possible.</p> <p>25 MR MANSFIELD: Yes, that is appreciated. The points we're</p> <p style="text-align: center;">Page 73</p>	<p>1 in their possession hopefully still or in the possession 2 of the police, and that's one of the key aspects to 3 this, that they see that, at the time that they are 4 giving evidence they know that the exercise of 5 retrieving what is necessary for, as it were, assessing 6 and identifying culpability and accountability, then it 7 gives them another element of confidence in what is 8 going on.</p> <p>9 So it's a circular situation in which you come back 10 to the same issue. 5A, which was the one I was just -- 11 has got a whole number of -- if you look at the main 12 issues from which it comes, 20A was the existing fire 13 safety, well, that's taken from 5A and the original list 14 of issues. There's no contention about that list of 15 issues, except one matter I'll mention in a moment.</p> <p>16 If you look at 5A and you go down the rest of the 17 page on which it's cited, B, C, D, they're extremely 18 important questions which the families recognise because 19 they're asking what at the moment are not going to come 20 up, in other words, you know, were they effective 21 measures? Did they fail? If they failed, who failed 22 them?</p> <p>23 Now, it may not necessarily always be a case of 24 identifying individuals at the beginning, it may be 25 a case of identifying the authority responsible for this</p> <p style="text-align: center;">Page 75</p>
<p>1 trying to make now is that it's all moved on 2 considerably from when they were first asked about 3 things.</p> <p>4 When they were first asked -- I mean, I don't 5 underestimate the trauma because, as you know, when 6 one's having considerable contact and experience, the 7 trauma is still there, there's still people without 8 homes to go to, there's still people without support, 9 there's still people suffering on a daily basis, so the 10 trauma is still there. But at the very beginning, when 11 the most they could do was try and get up each day, to 12 be asked to come and be first on in an inquiry that was 13 thought to be happening very soon was too much.</p> <p>14 That's changed because now, I think, from the latest 15 prognosis, perhaps the statement-taking might happen 16 quite soon but the giving of evidence certainly not, 17 because the pre-condition that they're all asking for -- 18 it's already been touched on, Mr Weatherby is going to 19 come to it after I've finished -- namely disclosure, the 20 key to this for all of them is ensuring that you and the 21 panel, if there is one, get to see everything and that 22 is disclosed, there is transparency.</p> <p>23 A lot is said in sympathy of transparency but, at 24 the end of the day, if we, as it were, are not able to 25 see what the miscreants in this particular instance have</p> <p style="text-align: center;">Page 74</p>	<p>1 and then you whittle it down at a later stage. So 2 I need not perhaps go through further illustrations of 3 why we say it's an artificial division and it will be 4 for the witnesses, experts as well as the individual 5 families, a much more sensible situation that they give 6 it all at once, which they were not able to do at the 7 beginning, but may I assure you, many of them now are 8 more than willing to, as it were, contribute to the 9 picture of failure because they were on, as it were, the 10 cutting edge of what went wrong.</p> <p>11 Now, I trespass slightly into another area but it 12 fits here, your counsel went through the various experts 13 and that's very helpful. But there's one or two 14 areas -- well, there's more than one or two, but I just 15 emphasise one area that is missing. One only begins to 16 touch on it when one begins to see the families, speak 17 to the families, and they say and they talk about the 18 environment.</p> <p>19 Now, environmental consequences are important. As 20 far as I can see on the experts, there's no one who is 21 actually dealing with that area: environmental damage.</p> <p>22 Now, the environmental damage here is not just 23 obviously the block of flats itself, but the people who 24 managed to get out -- and in many cases many of the ones 25 on the higher floors weren't necessarily burnt to death,</p> <p style="text-align: center;">Page 76</p>

1 although they may in the beginning have died from other
2 causes, and the biggest other cause is smoke in this
3 case and the distribution of smoke. Of course, the
4 families again have got very strong views on what can be
5 done in tower blocks to ensure that smoke is dispersed
6 at an early stage and it isn't in the communal areas.

7 But it's not just smoke because it's smoke that is
8 toxic. Now, toxicity, combined with environmental
9 issues, is something we would ask you to consider being
10 put specifically on the list for experts or assessors
11 and/or a member of the panel with a view to that because
12 there were reports -- and I go carefully because they
13 will have to be verified -- that a number of people were
14 treated for cyanide poisoning in hospital. So these are
15 impacts which we say have to be for the future
16 considered within any contingency plan.

17 So by the time you've, as it were, weighed up these
18 two aspects, the policy issue of having it all in one
19 and the practicality of attempting to split this up,
20 effectively what it would mean is that people would have
21 to hang on to the results of phase 1 and the impact of
22 phase 1 until you get to phase 2.

23 Now, on the timetable -- I don't want to pre-empt
24 it -- it would appear that phase 2 wouldn't start before
25 the autumn as such as a phase, it would start after the

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1 report into phase 1.

2 Therefore, it's delayed too much. It would be one
3 thing to have delay to prepare, quite another when the
4 delay by then would be far too long in terms of
5 an effective report on the overall question that is the
6 one that everyone wants answered.

7 But it's already been mentioned, I just put as
8 a footnote, doing it this way, as it were, re-visiting
9 the issue and deciding that it can all be done as one
10 ongoing matter without jeopardising anybody else, you
11 could at any point, the panel could at any point, just
12 say, as has been said for the coroners, you enter, as it
13 were, an interim -- not your version of an interim, but
14 an interim interim, in other words a few weeks down the
15 line when you've got enough information to indicate and
16 identify what has really gone wrong, you can put that
17 end to the government and suggest that these matters
18 require urgent attention. So that would be a way of, as
19 it were, dealing with that.

20 So unless there are any other questions on that
21 issue, I pass to the last one that I would like to
22 address.

23 This is the question -- and again it has
24 a ramification for the question of confidence, and that
25 is assessors.

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1 SIR MARTIN MOORE-BICK: Yes.

2 MR MANSFIELD: And I say it on behalf of another group as
3 well, so counsel who can't be here today, but one of the
4 concerns is that the assessors that you already have may
5 have some experience -- I cite one, Joe Montgomery -- in
6 relation to areas of urban regeneration and renewal, but
7 the concern is whether there's any assessor -- this is
8 again going back to tenants and the families -- who
9 actually has experience of social housing management.
10 We say there isn't anybody who is at the moment on the
11 assessor panel who is capable of really dealing with
12 that aspect of it.

13 So we would ask that consideration is given to
14 appointing somebody who has that experience and who can
15 advise in relation to that. That will infuse the
16 confidence issue if there is somebody who's got that
17 experience.

18 Now, we appreciate the terms of reference don't go
19 as wide as many wanted in the first place, and that's
20 another aspect of it which has caused concern. But it's
21 very, very difficult when one gets to the division, and
22 certainly phase 2, to not have regard to aspects of
23 social housing as it affected how these people were
24 dealt with before, the people who lived in that area as
25 opposed to any other area, and how questions of safety

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1 were addressed and, more particularly, financed. These
2 are issues that the families again would like put to the
3 fore in order for answers to be given.

4 So, in summary form, therefore, the matters that
5 I've raised all go to one issue at the end of the day,
6 and that is the real desire that the families have to
7 engage. They want to be involved, but they want to be,
8 as it were, feeling and being seen to do that through
9 the measures that we've attempted to put forward
10 constructively.

11 SIR MARTIN MOORE-BICK: Thank you very much indeed.

12 Submissions on behalf of core participants represented by

13 Bishop Lloyd & Jackson by MR WEATHERBY QC

14 SIR MARTIN MOORE-BICK: Your turn has come. It may be
15 possible, even if you want to take the whole of your
16 30 minutes, to complete you before we stop for lunch, if
17 that's what you'd like to do.

18 MR WEATHERBY: Yes, that would probably be very helpful all
19 round.

20 SIR MARTIN MOORE-BICK: I'm not putting you under any
21 pressure. You have 30 minutes, even if you overrun.

22 MR WEATHERBY: Thank you.

23 Well, I'm Pete Weatherby. I'm here representing 73
24 individuals who are either core participants or those
25 who are awaiting that status. They are a mixture of

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20 (Pages 77 to 80)

<p>1 people from the tower and from the walkways. Some of 2 them are bereaved, some of them are survivors, some of 3 them are displaced residents and, of course, some of 4 them are in each of those categories.</p> <p>5 As you've been told, representatives of the victim 6 core participants have used our time usefully in terms 7 of taking the inquiry's prompt to try to avoid 8 repetition. We've taken that seriously. Indeed, as you 9 know, many of us have considerable experience of doing 10 this in previous proceedings. Therefore, I'm the 11 appointed person to deal mainly with disclosure, which 12 I will come on to after I've made some preliminary 13 comments, if I may.</p> <p>14 I also would like to make clear publicly that I've 15 spoken to two of your leading counsel and I view that as 16 a particularly important part of the whole process, to 17 keep a dialogue going between all core participants and 18 your inquiry team.</p> <p>19 Also, within the families and individuals' 20 representatives, we are actively discussing ways of 21 combining to deal with future parts of the inquiry in 22 the most efficient way possible.</p> <p>23 Plainly no one has a bigger stake in the success of 24 both the criminal investigations and this inquiry than 25 those who have lost family members and friends, the</p> <p style="text-align: center;">Page 81</p>	<p>1 material, and therefore onwards to when it might be 2 disclosed.</p> <p>3 We say and we know that you recognise that justice 4 cannot be delivered to the victims of Grenfell by 5 courier; it has to be achieved with the involvement of 6 all and, in particular, the victims.</p> <p>7 Most of the questions that are being posed to us at 8 the moment, perfectly properly, about how witness 9 statements are to be provided and when, about input into 10 the instruction of experts, about timetable, we can only 11 properly answer these questions once the disclosure 12 process starts to roll.</p> <p>13 Let me just give a quick example, and I'll come back 14 to it, with experts. Although very recently we've had 15 the disclosure of the letters of instruction, we haven't 16 had any of the material or, indeed, knowledge of any of 17 the material that the experts have been provided with. 18 In those circumstances, it's impossible for me to 19 properly advise my clients or revert to the inquiry with 20 proper comments about the instruction of experts.</p> <p>21 Before I come to disclosure in a little more detail, 22 can I just turn to two topics which others have and will 23 speak about, only because they are so important.</p> <p>24 Now, I wanted to say that we fully endorse the 25 submissions by Mr Mansfield that the inquiry should sit</p> <p style="text-align: center;">Page 83</p>
<p>1 injured, the survivors, those who have lost their homes 2 and lost their communities. On behalf of all of 3 those that I represent, I make clear that all of my 4 representations to you today in going forward will have 5 that well in mind.</p> <p>6 I also make clear that we intend to engage fully 7 with the inquiry and assist its work; however, that does 8 not mean that we will do so passively or, indeed, 9 uncritically where appropriate.</p> <p>10 That leads me to a first submission, that, indeed, 11 many of those that I represent are disappointed that, 12 six months on from the disaster, there is a lack of 13 progress with the inquiry, particularly with the issue 14 of disclosure.</p> <p>15 They are also concerned at the provisional nature of 16 the timetable. Of course, we all recognise that that's 17 a matter that needs to evolve.</p> <p>18 But today we would certainly wish to come away from 19 these hearings -- or in the next few days, perhaps -- 20 with a commitment to the fullest possible disclosure, to 21 a commitment to an immediate start to the disclosure 22 process to core participants, to a plan to provide us as 23 soon as possible with a roadmap of what material the 24 inquiry currently has, what it expects to receive in due 25 course and an idea of when it expects to receive that</p> <p style="text-align: center;">Page 82</p>	<p>1 with a panel. We fully understand that that's not in 2 your gift, but we would seek that the inquiry is 3 proactive on that issue.</p> <p>4 We hear what you have said this morning about 5 a consultative group and we will certainly go back and 6 take instructions about that, but we would urge you 7 strongly not to view a consultative group as being any 8 substitution for a proper panel; they are two distinct 9 and different issues.</p> <p>10 We also strongly support submissions regarding 11 diversity that have been made and are going to be made 12 in more detail by Ms Munroe when I've finished my 13 submissions. Diversity has to be a central 14 consideration at all stages of the inquiry. We say 15 this: if you were to sit with a panel which reflected 16 the community which has been visited by this tragedy, it 17 would send a clear message that the inquiry understood 18 the concerns of the community and the needs of 19 diversity. We've made further written submissions about 20 that and I won't trespass much further on the subject.</p> <p>21 But in terms of diversity, we stress that our 22 clients are all different. They are young and old, men 23 and women, they are from diverse heritage. Most of my 24 clients are Muslim, many of them from a North African 25 heritage. They need an inquiry at all levels to</p> <p style="text-align: center;">Page 84</p>

<p>1 understand their experience, so far as that is possible, 2 and in order to give them the confidence that the 3 inquiry understands diversity and that it will be marked 4 by action and hopefully the composition of the inquiry 5 and not simply by words. 6 Now, before I go to my main topic, again one further 7 matter: phases. 8 We've listened carefully to what's been said by the 9 others ahead of me in respect of phases. We don't have 10 a fixed view on whether there should be two phases. We 11 make the comment that time has rolled on, of course, for 12 whatever reason, and we note the comments that have been 13 very properly made about the equivalent of preventing 14 further death recommendations that can be made, and we 15 make the comment that were, for example, one of the 16 expert reports to come back to you in a month or six 17 weeks' time to raise a matter which was of urgent 18 concern, then of course you wouldn't wait until the end 19 of phase 1 or phase 2 or phase whatever, you would 20 report that immediately. 21 So we doubt the efficacy of having two phases but, 22 as I say, we don't have a strong view on that. 23 Witness statements. We've listened carefully again 24 to the need for witnesses to provide evidence about the 25 14 June as soon as possible. We will assist in that</p> <p style="text-align: center;">Page 85</p>	<p>1 applications to withhold or redact documents because of 2 commercial sensitivities about contracts. These of 3 course may be at the centre of parts of your inquiry, 4 whether corners were cut because of financial 5 considerations. We would hope that the inquiry would 6 receive applications for such redaction or withholding 7 of disclosure and would promulgate them to all of the 8 CPs in terms that submissions may be made. As a part of 9 process -- 10 SIR MARTIN MOORE-BICK: Do you have a process in mind by 11 which that could be done without disclosing that which 12 ought not to be disclosed? 13 MR WEATHERBY: Well -- 14 SIR MARTIN MOORE-BICK: You might be prepared to discuss 15 some. 16 MR WEATHERBY: Of course we'd discuss that with your team, 17 but those sorts of problems are not uncommon. 18 SIR MARTIN MOORE-BICK: No. 19 MR WEATHERBY: Therefore, categories of documents, for 20 example, can be dealt with. In the example I give, 21 I would venture that there would be no great difficulty 22 in that process, doing that in very short order. 23 From our discussions, we don't think that the 24 default position that we put forward is particularly 25 controversial, full disclosure. We would hope not. If</p> <p style="text-align: center;">Page 87</p>
<p>1 process to the fullest extent possible. We've estimated 2 a timescale of six to eight weeks, although that could 3 be optimistic. It will depend, we would say, on the 4 progress that is made with disclosure and how quickly 5 that can be made. 6 We are sure that the inquiry will recognise that 7 our clients are not only important witnesses but 8 participants and victims and must be treated as such. 9 So the disclosure that is made cannot simply be tailored 10 to the issues of them giving a witness statement, and, 11 in particular, it can't be tailored to giving one part 12 of their story, 14 June. 13 So I move on to disclosure. 14 In general terms, the default position, we say, 15 should be that core participants should see everything 16 that the inquiry sees. We accept, of course, that there 17 are categories of material which are out of scope. We 18 accept that there are exceptions -- narrow exceptions, 19 we would say -- where disclosure may not be appropriate 20 or, indeed, where delays to disclosure might be 21 necessary, for example for the purposes of the criminal 22 investigations. But these exceptions, we say, should be 23 considered by application as against the default 24 position. They should not be assumed. 25 We understand, for example, there may be</p> <p style="text-align: center;">Page 86</p>	<p>1 it is, we are happy to have it out further at a future 2 hearing. But the process that Mr Friedman has spoken to 3 under article 2 we would say compels the inquiry to take 4 that as a default position in terms of a full, effective 5 and independent investigation. 6 Full disclosure not only to the inquiry but to the 7 bereaved and survivors is fundamental to illuminating 8 the facts and reaching judgments, and it's essential 9 also to the confidence in the process by those affected 10 and, indeed, the public more generally. 11 Full disclosure also has a further role in 12 confirming or allaying rumour and suspicion, whether 13 well-based or false. There are, of course, well-known 14 cases where lack of disclosure has led to substantial 15 miscarriages of justice. 16 So to the nuts and bolts, if I may, of disclosure. 17 There are very obviously two stages to disclosure, 18 at least two stages to disclosure: production to the 19 inquiry and disclosure from the inquiry. Can I just 20 deal with that in those two parts. 21 We note that the inquiry has sent letters of request 22 to various bodies. We've five particular points to make 23 regarding production to the inquiries, and we 24 particularly refer to paragraph 6 and onwards and 25 particularly 10 in our written submissions.</p> <p style="text-align: center;">Page 88</p>

<p>1 But I want to start with a submission which we set 2 out at paragraph 16, and this relates to candour. 3 In our submission the inquiry should seek position 4 statements from all the public authorities and other 5 organisations and companies who may have an involvement 6 in the disaster. We say that the inquiry should do so 7 without delay, and it should do so now. 8 Experience has shown that such institutions and 9 entities don't always act with candour. Now, there has 10 been much public debate following other high profile 11 inquiries and investigations concerning institutional 12 defensiveness, what has been described as a culture of 13 denial. There are in fact specific regulations dealing 14 with the duty of candour in the healthcare sector for 15 that very reason. 16 Now, experience also shows that if there is candour 17 at an early stage, the victims of such a traumatic 18 disaster may not have to be subjected to such 19 unnecessarily long proceedings, and the inquiry itself 20 would be hugely assisted by being informed of areas of 21 evidence which are less controversial than they might 22 otherwise have been assumed to be. 23 Let me develop this. The public authorities here, 24 the other institutions, the companies involved, six 25 months on from the disaster will have gathered their own</p> <p style="text-align: center;">Page 89</p>	<p>1 inquiry, then of course let them explain why. 2 We remind the inquiry and everybody else that in 3 criminal matters defendants are now required to give 4 statements setting out their case and what part of the 5 prosecution case they take issue with. In civil 6 proceedings, of course, the defence has been required 7 for many years. 8 What is therefore the imperative in inquisitorial 9 proceedings? One would hope that position statements 10 would be seen by all as a common-sense and important aid 11 through which to get to the truth as efficiently and as 12 quickly as possible. 13 Four other quick points on the production to the 14 inquiry. They have been dealt with in some way by 15 Mr Millett this morning. 16 Firstly, that producers of documents should be left 17 in no doubt as to their duty of candour and frankness to 18 the inquiry. They should be in no doubt that disclosure 19 should be made where there's any doubt. 20 Secondly, we would seek transparency about the 21 process of production and the correspondence generated 22 by it. We do seek disclosure of the letters of request 23 for material and the responses to those letters of 24 request. We don't, frankly, understand the reticence to 25 be transparent about this part of the process. If</p> <p style="text-align: center;">Page 91</p>
<p>1 material, formed their views of what they understood 2 happened and they will know to a significant degree if 3 there were failures on their part and what those 4 failures were. 5 Given the imperative that this inquiry comes as 6 quickly as is possible to conclusions that will prevent 7 further disaster and loss of life, and given the duty of 8 candour on public officials and authorities which exists 9 both at common law and under the convention, we submit 10 that such position statement setting out as full 11 a statement of what they say happened and, crucially, 12 what failures they accept on their behalf should be 13 sought immediately. 14 The position statements would greatly assist the 15 inquiry in targeting further disclosure, honing expert 16 evidence, tailoring the hearings to those areas that 17 actually are in dispute or are unclear. 18 Given the public interest in Grenfell, we would hope 19 that none of the public officials or authorities who of 20 course work for the public interest, or should do, or 21 those organisations or companies who have undertaken 22 management or work at public expense, would resist the 23 provision of such position statements, but if they do 24 resist such transparency and openness in the course of 25 giving the victims of Grenfell justice and assisting the</p> <p style="text-align: center;">Page 90</p>	<p>1 a public authority or a company or anybody else is 2 expressing doubt about their disclosure duties or there 3 are delays, then, with respect, we should know about it 4 and we should be in a position to make submissions about 5 it. 6 Thirdly, we note that there is a suggestion from 7 counsel to the inquiry that signed statements from chief 8 officers or chief executives of each producer of 9 documents may be required. We would invite you to 10 consider making that a requirement in each case, firstly 11 so that no one is actually singled out, but also so that 12 nobody is missed. 13 Lastly, in our written submissions we've raised the 14 issue of the need to gather original documents and, in 15 particular, take close attention to electronic 16 documents, but I hear what Mr Millett says about that 17 and I'll say no more about it. 18 Finally, in terms of production, we say that the 19 relationship between the police investigation and the 20 inquiry is something that we've all acknowledged as 21 being one of sensitivity and difficulty, we accept that. 22 But beyond that acceptance, of course, the victims have 23 a key interest in both the investigation and the 24 inquiry, and although the concerns that are raised are 25 very legitimate, they should not be allowed to</p> <p style="text-align: center;">Page 92</p>

<p>1 unnecessarily impede the proper progress of the inquiry. 2 Therefore, the relationship between the inquiry and the 3 police investigation should acknowledge that the 4 problems that are raised are in fact in practice less 5 than sometimes supposed. 6 Mr Mansfield has adverted to another inquest in 7 which both of us were involved where the relationship 8 between the inquiry and the investigation managed to cut 9 a middle line very carefully. 10 So, finally, in terms of disclosure to core 11 participants, we've already emphasised the necessity of 12 full disclosure. 13 We note that that is acknowledged in the written 14 material before today's hearing; however, we also note 15 that there is reference to selective disclosure in some 16 of those documents. We respectfully submit that there 17 is something of a mixed message here. 18 We would invite you to make clear that the default 19 position will be full disclosure. We say that 20 disclosure to core participants should be of everything 21 relevant or potentially relevant, apart from the small, 22 narrow areas where there is a countervailing public 23 interest. 24 We say that the process that has worked elsewhere 25 should be to recognise that disclosure has to be made in</p> <p style="text-align: center;">Page 93</p>	<p>1 the general disclosure, we would invite the inquiry team 2 to prioritise certain areas. 3 There has been discussion about the witness 4 statements that our clients are being asked to provide. 5 We would urge the inquiry to take a wide view of the 6 disclosure that's required for those witness statements. 7 It simply isn't just that our clients need to see their 8 police statements. There are a whole number of 9 different areas that they need to see. 10 Some of our clients want to give statements which 11 consider many different areas apart from 14 June, from 12 which of course we will extract those relevant parts for 13 phase 1. But we can't take that statement without 14 having a greater amount of disclosure. 15 We note that there hasn't been any discussion this 16 morning about video footage. We would invite the 17 inquiry to make available to core participants all of 18 the video footage that is available of the fire and its 19 immediate aftermath and all of the 999 calls, as well as 20 the other matters Mr Friedman in particular listed, 21 which are appended to his submissions and those which 22 are appended to the Fire Brigades Union submissions 23 which have been very helpful. 24 It is in our submission essential that we have such 25 material so that we know what questions we should be</p> <p style="text-align: center;">Page 95</p>
<p>1 an ad hoc and somewhat chaotic way. I say that because 2 producers of documents will produce those documents at 3 different times, and that the only practical way of 4 doing it and maintaining the progress of the inquiry, in 5 our respectful submission, is to treat disclosure as it 6 comes in, to triage it for relevance and to take those 7 narrow areas where disclosure can't be made out of it, 8 and then to disclose it in tranches. We would invite 9 the inquiry to look carefully at doing that and do that 10 now. 11 The idea that the inquiry needs to wait until it 12 gets disclosure about particular parts of the list of 13 issues before disclosure can be considered and then made 14 to core participants is a process that we would say will 15 not work and, more than that, will lead to huge delays 16 in terms of disclosure, and then an inability by any of 17 the core participants, the individuals or the 18 organisations, to be able to manage that disclosure and 19 properly prepare and make proper submissions about 20 experts, witness statements, hearings or whatever. So 21 we would urge you to rethink that and to make disclosure 22 in tranches as has been suggested. 23 Further to the general disclosure process, we note 24 that, of course, the inquiry has priorities. There has 25 been discussion about phase 1 and 14 June. Apart from</p> <p style="text-align: center;">Page 94</p>	<p>1 asking of our clients to elicit the relevant material. 2 Now, we also wish to have the housing and repair 3 files, which may well bring to the fore complaints that 4 have been made by our clients about safety issues and 5 such like. 6 So the fuller the disclosure that's made at this 7 juncture, the better the statements that we provide to 8 the inquiry, the more useful they will be. 9 Those are our submissions. Beyond those, we endorse 10 what's been said about experts with the caveats that 11 I've spoken to already. 12 We note you will be addressed further about the 13 venue for hearings, and we would like to put on record 14 that our view is that the venue should be at a location 15 closer to where the disaster occurred. 16 I don't know whether there's anything I can assist 17 with further than that. 18 SIR MARTIN MOORE-BICK: I think not at the moment, thank 19 you, but that's certainly been very useful and very 20 helpful. Thank you. 21 MR WEATHERBY: Thank you. 22 SIR MARTIN MOORE-BICK: And very good timing, if I may say 23 so. 24 Before we all rise for some lunch, Ms Murphy, you 25 wanted to be included in this list of those who are</p> <p style="text-align: center;">Page 96</p>

<p>1 going to address me?</p> <p>2 MS MURPHY: Sir, when I saw the timetable on Friday, I was</p> <p>3 in communication with Mr Stein and he was going to take</p> <p>4 the points concerning --</p> <p>5 SIR MARTIN MOORE-BICK: He is going to take your points?</p> <p>6 MS MURPHY: Yes.</p> <p>7 SIR MARTIN MOORE-BICK: That's a shame, because I was going</p> <p>8 to tell you that, as a result of all other counsel being</p> <p>9 so efficient, there's quarter of an hour in the</p> <p>10 timetable which you could have.</p> <p>11 MS MURPHY: Yes, but we would prefer to leave it at that.</p> <p>12 SIR MARTIN MOORE-BICK: All right.</p> <p>13 So after the lunch break we'll go straight to</p> <p>14 Ms Munroe. Is that right?</p> <p>15 MS MURPHY: Please.</p> <p>16 SIR MARTIN MOORE-BICK: Right. Good. Thank you very much.</p> <p>17 Well, that's a good time. We'll stop now for some</p> <p>18 lunch and start again at 2 o'clock, please.</p> <p>19 Thank you very much.</p> <p>20 (1.00 pm)</p> <p>21 (The short adjournment)</p> <p>22 (2.05 pm)</p> <p>23 SIR MARTIN MOORE-BICK: According to the running order,</p> <p>24 Ms Munroe is next up.</p> <p>25 Submissions on behalf of core participants</p> <p style="text-align: center;">Page 97</p>	<p>1 certainly the intention and the manner in which we make</p> <p>2 these submissions to you, as a means of opening the</p> <p>3 dialogue, again borrowing from what has been said</p> <p>4 already this morning, opening the channels of dialogue</p> <p>5 and hopefully having positive, constructive suggestions</p> <p>6 of moving forward, but also highlighting and flagging up</p> <p>7 those issues which we say are particularly important</p> <p>8 and, indeed, central to the inquiry.</p> <p>9 Sir, I would also say that the matters that I am</p> <p>10 going to touch upon I hope are not regarded as soft or</p> <p>11 tangential. We say these are central and they are</p> <p>12 founded in law and very established legal principles.</p> <p>13 Sir, in respect of the Grenfell fire, we -- and when</p> <p>14 I say "we", I mean members of the public -- are all</p> <p>15 living in an age of rolling news where we see events</p> <p>16 unfold in real time. There is, because we're so exposed</p> <p>17 to rolling news and events in real time, perhaps</p> <p>18 a tendency for people to become desensitised or inured</p> <p>19 to what they are seeing. That didn't happen with the</p> <p>20 Grenfell fire and that perhaps is illustrative of the</p> <p>21 nature, the extent and the gravity of what was unfolding</p> <p>22 before people's eyes.</p> <p>23 This wasn't just a local tragedy, this wasn't just</p> <p>24 national tragedy. Perhaps first and foremost this</p> <p>25 represents a number of personal tragedies for the</p> <p style="text-align: center;">Page 99</p>
<p>1 represented by Deighton Pierce Glynn by MS MUNROE</p> <p>2 MS MUNROE: Good afternoon, sir. Allison Munroe. I'm</p> <p>3 instructed by Birnberg Peirce and also Deighton Pierce</p> <p>4 Glynn.</p> <p>5 I should say at the outset, sir, that the</p> <p>6 submissions that were filed on behalf of Birnberg Peirce</p> <p>7 are adopted and supported by Deighton Pierce Glynn.</p> <p>8 SIR MARTIN MOORE-BICK: Yes, thank you.</p> <p>9 MS MUNROE: Sir, the matters I propose to deal with very</p> <p>10 much dovetail and overlap on the very comprehensive</p> <p>11 submissions that have already been made this morning by</p> <p>12 the advocates representing a number of core participants</p> <p>13 who are the next of kin of deceased, survivors and</p> <p>14 residents, and they cut across those fundamental, I say,</p> <p>15 principles and legal submissions that have been made in</p> <p>16 relation to article 2, to the question of appointing</p> <p>17 a panel, the structure of the inquiry and, indeed,</p> <p>18 disclosure.</p> <p>19 So, in addressing you, I hope to deal, I hope</p> <p>20 concisely and comprehensively, with four</p> <p>21 points: article 14, the public sector equality duty, the</p> <p>22 question of diversity and inclusion and, finally, the</p> <p>23 issue of venue.</p> <p>24 SIR MARTIN MOORE-BICK: Yes, right, thank you.</p> <p>25 MS MUNROE: Sir, I hope what I say is constructive. That is</p> <p style="text-align: center;">Page 98</p>	<p>1 individuals who are here today, those who lost their</p> <p>2 loved ones, those who survived, those in the immediate</p> <p>3 vicinity of the area.</p> <p>4 And grief isn't time-limited. We've spoken about</p> <p>5 delay today but, in fact, anyone who has experienced</p> <p>6 grief will know that six months is actually a relatively</p> <p>7 short amount of time. People deal with grief in</p> <p>8 different ways and the timescales for people are very</p> <p>9 different. But that, sir, has an impact upon how people</p> <p>10 are engaging and how ready they feel to engage and what</p> <p>11 can be done by the process itself to enhance that</p> <p>12 engagement.</p> <p>13 The Grenfell fire didn't happen in a vacuum and so</p> <p>14 we have to be alive to the realities of the situation,</p> <p>15 the socioeconomic and political realities of what we're</p> <p>16 dealing with and looking at what we're dealing with. As</p> <p>17 I said, local and personal tragedies that have national</p> <p>18 and worldwide ramifications.</p> <p>19 Those who are affected come from a diverse -- and</p> <p>20 it's a word I'll be using quite a lot -- social group,</p> <p>21 a diverse group culturally, racially, ethnically, by</p> <p>22 religion, by occupation, by financial background,</p> <p>23 although predominantly it's a working class community.</p> <p>24 There's a large proportion of those within the community</p> <p>25 from immigrant backgrounds, some longstanding, some more</p> <p style="text-align: center;">Page 100</p>

<p>1 recent.</p> <p>2 That make-up, whilst it is in some respects very</p> <p>3 broad, perhaps is a reason why that community is so</p> <p>4 nonetheless cohesive, because what can be seen very,</p> <p>5 very clearly, both from the immediate aftermath of the</p> <p>6 fire and in the preceding months is that this is a very</p> <p>7 strong, very cohesive community with a clear sense of</p> <p>8 community and how they are affected.</p> <p>9 We also have to be very, very much alive to the fact</p> <p>10 that this disaster happened, as has already been said,</p> <p>11 within a pocket of one of the richest boroughs in</p> <p>12 London. London, the richest city in the UK, one of the</p> <p>13 richest cities in Europe and the world. That is</p> <p>14 a reality that cannot be ignored.</p> <p>15 We welcome, sir, what has been said by the inquiry</p> <p>16 team in terms of putting those directly affected at the</p> <p>17 heart of this inquiry process. But many still strongly</p> <p>18 feel that their voices are not being heard; indeed, it</p> <p>19 is a real sense from many of those that we represent</p> <p>20 that in the past their voices have not been heard and,</p> <p>21 perhaps, if those voices had been heard in the past we</p> <p>22 wouldn't be here today.</p> <p>23 So how can the inquiry and the process itself ensure</p> <p>24 that those voices do not go unheard this time round?</p> <p>25 As we have said in our submissions, firstly looking</p> <p style="text-align: center;">Page 101</p>	<p>1 It would be morally repugnant and indeed unlawful</p> <p>2 for the playing field effectively not to be a level</p> <p>3 playing field so that they all can participate and be</p> <p>4 engaged in a meaningful way.</p> <p>5 As I said, sir, the question of diversity, it's</p> <p>6 a word that is used a lot, not just in the legal context</p> <p>7 but outside of these walls, within public bodies, within</p> <p>8 other organisations, and it elicits a number of</p> <p>9 responses. Sometimes it can elicit the response of eyes</p> <p>10 being rolled, boxes being ticked. It's important --</p> <p>11 moreover, vital -- that when one considers diversity, it</p> <p>12 is seen as a central and important factor. We say it's</p> <p>13 central and important because it actually adds value to</p> <p>14 the inquiry. It adds value to the decision-making</p> <p>15 process. It adds value to the actual legal process.</p> <p>16 Now, again, certainly we are not suggesting that the</p> <p>17 inquiry and the inquiry team have not been alive to</p> <p>18 these issues. There have been a number, I understand,</p> <p>19 of consultations that have been carried out prior to the</p> <p>20 inquiry's official opening. However, the attendance has</p> <p>21 not been at its optimum and perceptions are important.</p> <p>22 Unfortunately, those consultation meetings are not</p> <p>23 perceived as being particularly inclusive at this stage.</p> <p>24 But that's not a situation that we say is</p> <p>25 irrevocable. It's one that has to be faced head on and</p> <p style="text-align: center;">Page 103</p>
<p>1 at article 14, it's a prohibition on discrimination</p> <p>2 which requires that rights under article 2 that are</p> <p>3 engaged in relation to the inquiry must be equally</p> <p>4 available to all core participants, regardless of social</p> <p>5 status, disability, ethnic origin or age.</p> <p>6 I should say at this point, pausing for a moment,</p> <p>7 when looking at the community, I mentioned a number of</p> <p>8 different factors. We need also to be very much</p> <p>9 conversant with the fact that we are looking at</p> <p>10 a community that has a number of people with</p> <p>11 disabilities, there is a large proportion within the</p> <p>12 community of young people, young parents with very young</p> <p>13 children.</p> <p>14 We are also looking -- this very much comes into the</p> <p>15 second point about the public sector equalities duty --</p> <p>16 at a group of individuals who are actually suffering</p> <p>17 a disability, and I say that because of the trauma that</p> <p>18 they have experienced as a direct consequence of the</p> <p>19 fire. It was something that Mr Mansfield touched upon</p> <p>20 and perhaps it's not something that has garnered a lot</p> <p>21 of traction at the moment, but it will, I'm sure, as</p> <p>22 time progresses and as more comes to light, that clearly</p> <p>23 there are a lot of people who are still suffering trauma</p> <p>24 as a result of what they saw, what they experienced and</p> <p>25 what their families experienced.</p> <p style="text-align: center;">Page 102</p>	<p>1 has to be addressed, but it's one that can be rectified.</p> <p>2 It's crucial that those in the community feel invested</p> <p>3 in the process, and it undermines their confidence if</p> <p>4 they're not invested in that process.</p> <p>5 I know, sir, that it is something, as I said, that</p> <p>6 the inquiry team are alive to, but it's important that</p> <p>7 it's not simply recognised but power is given to the</p> <p>8 words and intention.</p> <p>9 There is a real perception and a real, deeply-held</p> <p>10 feeling amongst many of those that we represent that</p> <p>11 their effective participation in the inquiry process has</p> <p>12 been compromised. Those at the heart of the disaster</p> <p>13 need to feel that they are being listened to, as I say,</p> <p>14 but also they need to feel that they are not simply</p> <p>15 passive bystanders to the retelling of their own history</p> <p>16 and the facts of their own history.</p> <p>17 Mr Mansfield has already highlighted and drawn, sir,</p> <p>18 your attention to the report by Dr Stewart. I would</p> <p>19 commend that report to the inquiry team. It's a concise</p> <p>20 but very, in my submission, trenchant piece of work. It</p> <p>21 explains in very clear terms why issues of diversity are</p> <p>22 so important in the context of a disaster. Dr Stewart</p> <p>23 makes parallels with other inquiries, such as the</p> <p>24 Lawrence Inquiry, and how an awareness of diversity and</p> <p>25 inclusion was fundamental to enhancing public confidence</p> <p style="text-align: center;">Page 104</p>

<p>1 and community engagement, and ultimately added value, as</p> <p>2 I say, to the inquiry and the decisions that were made</p> <p>3 and the reports that were filed.</p> <p>4 So one has an eye to that question of raising and</p> <p>5 enhancing public confidence, and that very much, as</p> <p>6 I said at the outset, sir, ties in with notions of the</p> <p>7 appointment of panel and the structure and scope and</p> <p>8 breadth of the inquiry. They all feed into notions of</p> <p>9 community engagement and enhancing public confidence.</p> <p>10 As Dr Stewart points out at paragraph 5 of her</p> <p>11 report, the Grenfell Tower inquiry would do well to</p> <p>12 garner the confidence of the local community, to</p> <p>13 encourage their engagement and feelings of inclusion in</p> <p>14 the procedures in order to improve the investigation by</p> <p>15 learning the lessons on the importance of social,</p> <p>16 cultural diversity from the Stephen Lawrence inquiry.</p> <p>17 That perhaps encapsulates, as I said, the points that</p> <p>18 she makes in that report.</p> <p>19 In terms of community engagement, as I said, sir,</p> <p>20 the structure and having those who represent or reflect</p> <p>21 the community as a real part of the structure of the</p> <p>22 process again will enhance that level of confidence and</p> <p>23 that feeling of engagement. I won't repeat them because</p> <p>24 they're there in the submissions that we drafted on</p> <p>25 behalf of Birnberg Peirce, and I think there have</p> <p style="text-align: center;">Page 105</p>	<p>1 and traumatising.</p> <p>2 So that brings me, then, on to the question of</p> <p>3 venue.</p> <p>4 Obviously we are in this room. It is stuffy,</p> <p>5 perhaps, to say the least. It has become more and more</p> <p>6 so as the morning and the afternoon has gone on. It is</p> <p>7 not perhaps the most ideal from the legal point of view.</p> <p>8 But put the lawyers to one side. I make my submissions</p> <p>9 on the venue primarily in respect of those that we</p> <p>10 represent.</p> <p>11 Initially the inquiry, of course, was going to be at</p> <p>12 the Connaught Rooms, and Birnberg Peirce made</p> <p>13 representations in relation to that and why those</p> <p>14 provisions were inadequate. Those representations still</p> <p>15 hold in regards to the new venue, this venue.</p> <p>16 I note from paragraph 62 of counsel's statement that</p> <p>17 it is said why the venue was chosen, and I quote:</p> <p>18 "The venue has been selected because of its central</p> <p>19 location, good transport links to the Latimer Road area</p> <p>20 and suitable disabled provisions. It is large and</p> <p>21 well-provisioned enough for the operation of the inquiry</p> <p>22 and the accommodation of a reasonable number of those</p> <p>23 wishing to attend the hearings."</p> <p>24 That may be true to an extent. Its central</p> <p>25 location, one would say central primarily to the</p> <p style="text-align: center;">Page 107</p>
<p>1 already been alluded to this morning a number of</p> <p>2 authorities which deal with that the question of putting</p> <p>3 the victims and next of kin at the centre of matters,</p> <p>4 but also this question of humanity, dignity and respect.</p> <p>5 And they are three small words, but they have tremendous</p> <p>6 impact.</p> <p>7 These are individuals, many of whom are sitting at</p> <p>8 the back of the room --</p> <p>9 SIR MARTIN MOORE-BICK: Yes.</p> <p>10 MS MUNROE: -- who ask for -- and it's not a big ask --</p> <p>11 dignity, humanity and respect in the way that they are</p> <p>12 treated and the way in which they are provided with</p> <p>13 engagement and an opportunity to engage in this process.</p> <p>14 Now, that involves not simply the legal and</p> <p>15 structural matters that we have dealt with, but also</p> <p>16 looking at the individuals and putting in appropriate</p> <p>17 measures to ensure their well-being, both physical,</p> <p>18 emotional and psychological.</p> <p>19 The inquiry should ensure that next of kin,</p> <p>20 survivors and residents are afforded special</p> <p>21 consideration and care to avoid being further</p> <p>22 traumatised by the process itself. That is something,</p> <p>23 sir, that one has seen in a number of different</p> <p>24 inquiries and inquests, where individuals say that the</p> <p>25 actual legal process itself can be quite dehumanising</p> <p style="text-align: center;">Page 106</p>	<p>1 lawyers, and one can even demarcate it even further,</p> <p>2 perhaps central to the Bar and not necessarily central</p> <p>3 to a lot of the solicitors who represent those next of</p> <p>4 kin, residents and survivors.</p> <p>5 In terms of its location and in terms of the</p> <p>6 building itself, we represent, as I said, a diverse</p> <p>7 group of people, many young parents, those with young</p> <p>8 children, those with disabilities. Travelling to and</p> <p>9 from, if they want to fully engage and be physically</p> <p>10 here, has a cost, a financial cost. Central London.</p> <p>11 Lunchtime, provisions for food. In terms of the</p> <p>12 engagement with the legal teams, conference rooms,</p> <p>13 facilities for that. Ensuring that those who come can</p> <p>14 participate because they may need interpreters, they may</p> <p>15 need other specific needs to that individual.</p> <p>16 Those are matters that are important, but overriding</p> <p>17 all of that, many of those that we represent say that</p> <p>18 the choice of venue, perhaps had there been a greater</p> <p>19 level of discussion and engagement with the community,</p> <p>20 may have resulted in a different choice. They have been</p> <p>21 looking themselves at alternatives in the locality of</p> <p>22 the area. At the moment, amongst those that have been</p> <p>23 identified is a local college as an alternative venue.</p> <p>24 It would need to be kitted out effectively in terms of</p> <p>25 provisions to make it the home of the inquiry, but there</p> <p style="text-align: center;">Page 108</p>

<p>1 is time to do that.</p> <p>2 SIR MARTIN MOORE-BICK: I think they also have to be able to</p> <p>3 make available enough room for long enough, wouldn't</p> <p>4 they?</p> <p>5 MS MUNROE: Yes.</p> <p>6 SIR MARTIN MOORE-BICK: Could that be a difficulty? I don't</p> <p>7 know.</p> <p>8 MS MUNROE: That may be a difficulty, but again, it is not</p> <p>9 insurmountable. As has already been mentioned, there</p> <p>10 are many of us here who have been involved in similar --</p> <p>11 certainly out of London, in my case -- long-running</p> <p>12 inquests in which the question of venue was something</p> <p>13 that had to be revisited and was overcome. There is</p> <p>14 time to do that. Certainly what we would ask at this</p> <p>15 stage is that that dialogue is opened. There are</p> <p>16 options that need to be looked at. Whether they are</p> <p>17 viable, sir, for the reasons you've mentioned --</p> <p>18 SIR MARTIN MOORE-BICK: You mentioned the college; is that</p> <p>19 Kensington and Chelsea College?</p> <p>20 MS MUNROE: Yes.</p> <p>21 SIR MARTIN MOORE-BICK: Thank you. Right.</p> <p>22 MS MUNROE: So those are the kind of things that would need</p> <p>23 to be looked at, the viability in terms of long-term</p> <p>24 because clearly we are looking at well into the future</p> <p>25 in terms of how long this inquiry will run to its</p> <p style="text-align: center;">Page 109</p>	<p>1 well as those we represent.</p> <p>2 I think, in fact, I've covered those four matters,</p> <p>3 keeping in the trend of this morning, within time.</p> <p>4 SIR MARTIN MOORE-BICK: Yes, you've done very well. Thank</p> <p>5 you very much. Yes. Well, thank you very much for your</p> <p>6 submissions.</p> <p>7 Mr Stein, I think you are due to speak next.</p> <p>8 Submissions on behalf of core participants represented</p> <p>9 by Howe & Co by MR STEIN QC</p> <p>10 MR STEIN: Sir, working with my junior, Mark Henderson, and</p> <p>11 the solicitors team from Howe & Co, we take a firmly</p> <p>12 pro-family, pro-survivor and pro-community core</p> <p>13 participant stance. We will remind and emphasise to</p> <p>14 this inquiry, where required, that the reason why the</p> <p>15 core participants we represent have been granted that</p> <p>16 status within the Inquiries Act 2005 is that the 65 that</p> <p>17 we represent are before this inquiry because they have</p> <p>18 lost loved ones, they have been injured, they have been</p> <p>19 poisoned by cyanide, they have been taken to hell</p> <p>20 itself.</p> <p>21 This means, and the driver therefore for our</p> <p>22 submissions is, that we ask this inquiry the simple</p> <p>23 question of: when will it start? When will the truth</p> <p>24 come out? When can we start seeing the defences and</p> <p>25 potential excuses which will be raised by companies and</p> <p style="text-align: center;">Page 111</p>
<p>1 conclusion. But those are not insurmountable and we</p> <p>2 have time, sir, to do that. And it's something that</p> <p>3 very much has exercised those within the community, the</p> <p>4 question of venue. Certainly they would not want it to</p> <p>5 be seen as an add-on, as I said, a tangential or a side</p> <p>6 issue compared for the very, very important legal</p> <p>7 matters that you've heard about this morning and will</p> <p>8 hear about further in due course.</p> <p>9 Because it affects, again, going back to the</p> <p>10 question of participation and engagement and confidence,</p> <p>11 if one cannot physically get to the inquiry or, once one</p> <p>12 is there, you can't physically participate because of</p> <p>13 a lack of services or a lack of room or just financially</p> <p>14 the prospect of bringing a small child, having to find</p> <p>15 food for that child, these are practical matters which</p> <p>16 I know others will address you on, but they feed into</p> <p>17 the whole question of venue. So, sir, we would</p> <p>18 certainly say the time is now and the opportunity is</p> <p>19 here for us to look at this afresh.</p> <p>20 There is one caveat in relation to venue that I know</p> <p>21 that some of the residents, survivors, next of kin are</p> <p>22 concerned about another council building being used.</p> <p>23 I say that as a caveat. But the overall position is</p> <p>24 that the venue, they say, should be one locally to allow</p> <p>25 better access for individual members of the public as</p> <p style="text-align: center;">Page 110</p>	<p>1 institutions at fault?</p> <p>2 For the purposes of these submissions, we will refer</p> <p>3 to our written submissions and follow the same order.</p> <p>4 May I deal, first of all, therefore, with</p> <p>5 statement-taking from core participants and the giving</p> <p>6 of evidence before this inquiry set out at pages 2 to 4.</p> <p>7 We recognise that a real priority for this inquiry</p> <p>8 relates to the statement-taking from core participants,</p> <p>9 and indeed a question that you need an answer to, which</p> <p>10 is: when can that be completed? It is obvious to us</p> <p>11 that this is a major part of the process of getting this</p> <p>12 inquiry underway, answering, therefore, the question of</p> <p>13 when the inquiry will start.</p> <p>14 We know also that the inquiry needs to have these</p> <p>15 statements so that decisions can be made as to the</p> <p>16 measures that are going to be required in order for</p> <p>17 evidence to be given. These answers to those questions</p> <p>18 are of real importance to the inquiry and they affect</p> <p>19 the basic planning of the inquiry itself, the length of</p> <p>20 evidence, the practical steps and technical needs that</p> <p>21 will be required from the giving of and the receipt of</p> <p>22 this evidence.</p> <p>23 Equally, we understand the questions asked in the</p> <p>24 draft guidance provided by counsel to the inquiry,</p> <p>25 although lengthy, are at least in part designed to</p> <p style="text-align: center;">Page 112</p>

<p>1 provide answers for the experts who are considering the 2 various parts of this disaster. Those experts need 3 answers as far as possible, moment by moment, as to the 4 spread of the fire, the so-called fire safety advice and 5 the way that the emergency services acted.</p> <p>6 Howe & Co, my instructing solicitors, have some very 7 real and recent experience in the statement-taking from 8 traumatised individuals. We know that sometimes it can 9 be a relatively straightforward task. But other times, 10 sir, the grief and terror intrude so much that it can 11 become a longer process, as has just been mentioned. 12 People react different ways and there is no right or 13 wrong way.</p> <p>14 Equally, we have the very real practical problems of 15 dealing with so many people still trying to bring 16 a semblance of order to their lives. The answer that we 17 have, and I hope helpful, is that we are starting the 18 process of statement-taking immediately and we will not 19 wait until all disclosure is complete. That has already 20 been set out in correspondence from Mr Howe on 21 8 December.</p> <p>22 Of course, we need disclosure. We need disclosure 23 of the main parts, if not all, of the relevant evidence 24 that can be provided from statements made and interviews 25 that have been provided to the police. But that can be</p> <p style="text-align: center;">Page 113</p>	<p>1 required by the experts sooner rather than later would 2 be of real assistance.</p> <p>3 Further, it may be of assistance for the inquiry 4 and, chair, for you to consider that there is a need to 5 have information from core participants who are 6 providing statements as to how, they would ask, their 7 evidence can be given before the inquiry. Because that 8 is a practical need that this inquiry needs to have 9 answered.</p> <p>10 The very many courts that exist are very used to the 11 different ways that evidence can be provided: from the 12 witness box and in full view, from behind screens, over 13 a video link with views limited to the chair and 14 representatives, prerecorded interviews, sometimes of 15 course anonymously.</p> <p>16 Questions of survivor core participants, residents 17 from the area, or from those people most affected may be 18 requested to be asked by core participant legal teams. 19 We ask that you deal with such requests with care. We 20 suggest that such questions be indicated well in advance 21 and over a longer period than may be required by 22 institutional or corporate core participants.</p> <p>23 In summary, therefore, we propose the 24 following: statement-taking to start immediately, 25 disclosure, as already discussed, being vital to</p> <p style="text-align: center;">Page 115</p>
<p>1 brought into those statements when it is made available. 2 But it still does represent a need for that disclosure 3 process to be completed as soon as possible and we hope 4 in January.</p> <p>5 We intend to take the statements as a whole and not 6 leave out part of the accounts to comply with any 7 phasing of the inquiry analysis. The reason for this 8 that we have considered is that the people we represent 9 want to be heard and they want their accounts to be 10 given, and given in a way that deals not only with what 11 happened in the lead-up to the fire, the fire itself, 12 but also the failures we suggest by the Local Authority 13 and the state thereafter.</p> <p>14 The best way for statements such as this to be 15 provided, we have found, is to allow the individual to 16 provide their own narrative account of the incident and 17 then follow that with answers to the more detailed 18 questions being asked through the inquiry guidance 19 document.</p> <p>20 We would be assisted if counsel to the inquiry 21 identify for the solicitors teams carrying out this task 22 the essential questions that are required by the 23 experts. Now, that is because the current guidance on 24 asking questions is some 200 questions and 25 sub-questions, and the identification of those that are</p> <p style="text-align: center;">Page 114</p>	<p>1 complete this process, and must be targeted to be 2 complete as early as possible in January. We 3 understand, of course, this may be phased, but the 4 inquiry should not halt its disclosure process until 5 complete because we can read as we go through the 6 disclosure in phases.</p> <p>7 We'd also suggest that there is a date set by which 8 at least an indication will be given of which method or 9 process for giving evidence will be likely to be 10 required. You'll forgive me for adding perhaps the 11 completely obvious: this is only an indication and 12 should not be regarded as the final answer because 13 people's views may change.</p> <p>14 May I move on to the core participants support 15 points that have been raised already and we've set out 16 in detail at page 5.</p> <p>17 For those giving evidence there is a need to ensure 18 that support is available. That can come in many 19 forms: trained counsellors, the presence of a friend or 20 relative and, of course, basic interpretation when 21 required.</p> <p>22 But there is also a need for more general but 23 equally vital support for those core participants who 24 need practical assistance with childcare, transport and 25 costs, whether they are giving evidence or not on any</p> <p style="text-align: center;">Page 116</p>

<p>1 particular day. Travel, attendance and subsistence</p> <p>2 allowance and/or loss of earnings must be considered for</p> <p>3 attending hearings and meetings in relation to the</p> <p>4 inquiry, including meetings with solicitors.</p> <p>5 The provision of childcare at inquiry events, at</p> <p>6 inquiry days. The provision for the cost of that</p> <p>7 childcare to support meetings in relation to the</p> <p>8 inquiry, including, again, meetings with solicitors.</p> <p>9 Support for regular, small, incidental expenses incurred</p> <p>10 by core participants, for example the cost of printing,</p> <p>11 of documents that have been circulated, mobile phone</p> <p>12 credit to support contact with solicitors and, where</p> <p>13 necessary, the inquiry. Access to computers and iPads</p> <p>14 or similar.</p> <p>15 Here it would be wrong for me not to pause and thank</p> <p>16 the work of Rugby Portobello, who have I think</p> <p>17 orchestrated and have been provided by companies such as</p> <p>18 Apple the handing out of many laptops and iPads and the</p> <p>19 like, not only to the bereaved but to many others who</p> <p>20 have been affected.</p> <p>21 There is still, though, the need, as I was myself</p> <p>22 reminded this morning, to recognise that many core</p> <p>23 participants have lost all of their belongings, are</p> <p>24 still living in emergency or temporary accommodation and</p> <p>25 have great difficulty in accessing the inquiry's website</p> <p>Page 117</p>	<p>1 away and clear their heads.</p> <p>2 I turn now to the questioning of witnesses on behalf</p> <p>3 of core participants.</p> <p>4 We hope we can take this briefly and we hope</p> <p>5 helpfully. The trap that an inquiry can fall into is to</p> <p>6 overly limit the questioning of witnesses on behalf of</p> <p>7 core participants. This is an error. It engenders</p> <p>8 a feeling of exclusion and non-participation, plus,</p> <p>9 frankly, it also leads to requests to hear submissions</p> <p>10 on these points, which actually tends to hold up the</p> <p>11 process. The preferred way is to simply limit further</p> <p>12 questions to new areas or new directions and not to</p> <p>13 allow repetition from core participant representatives.</p> <p>14 Expert evidence and timetabling, page 7 of our</p> <p>15 submissions.</p> <p>16 SIR MARTIN MOORE-BICK: Yes.</p> <p>17 MR STEIN: As recently as 30 November, the inquiry requested</p> <p>18 that core participants make any submissions about</p> <p>19 inquiry expert witnesses no later than 4 pm on</p> <p>20 4 December 2017. We submit that this type of</p> <p>21 timetabling of submissions and responses is wrong and</p> <p>22 devalued the participation within this inquiry of core</p> <p>23 participants. We submit this must never happen again.</p> <p>24 Doing this and accepting such timetabling if we were</p> <p>25 to would mean that the only dialogue that you will have</p> <p>Page 119</p>
<p>1 and receiving communication from the inquiry and their</p> <p>2 representatives. This is a real stumbling block. We</p> <p>3 suggest it may well have been a shock to the inquiry</p> <p>4 team to learn how many core participants still live in</p> <p>5 single rooms in hotels even to this date, and many will</p> <p>6 do so over the Christmas break.</p> <p>7 In terms of further practical arrangements, it has</p> <p>8 been set out in some written submissions that a four-day</p> <p>9 sitting week of the public aspect of the inquiry might</p> <p>10 well assist in managing family responsibilities. It</p> <p>11 also is a practical way forward sometimes when dealing</p> <p>12 with large-scale inquiries or inquests to sit on four</p> <p>13 days, because the fifth day is either a useful day for</p> <p>14 the inquiry chair and team, but also, where necessary,</p> <p>15 if there is a need to deal with detailed legal</p> <p>16 submissions.</p> <p>17 SIR MARTIN MOORE-BICK: I think there's pretty well</p> <p>18 unanimity on that question.</p> <p>19 MR STEIN: The inquiry site and its location has already</p> <p>20 been mentioned. We echo all of those submissions: it</p> <p>21 must be closer and must be closest to those people that</p> <p>22 have lost so much.</p> <p>23 The inquiry site must also allow for all faiths, so</p> <p>24 that religious observance can be maintained, as well as</p> <p>25 providing a quiet space for those who simply need to get</p> <p>Page 118</p>	<p>1 will be only with lawyers. It will become a chat</p> <p>2 between us and the inquiry and it will lose the</p> <p>3 participation of core participants.</p> <p>4 SIR MARTIN MOORE-BICK: I think, to be fair to the inquiry</p> <p>5 team, they were intending to ask for immediate responses</p> <p>6 in time for this hearing. I don't think anybody</p> <p>7 contemplated that responses received later would be</p> <p>8 ignored. I make that clear, that's all.</p> <p>9 MS MUNROE: It perhaps -- and may I temporise then for</p> <p>10 a moment -- should have been dealt with with a little</p> <p>11 more care, because the correspondence did appear to give</p> <p>12 it as a final line.</p> <p>13 But may I assist. Mr Millett QC this morning</p> <p>14 accepted in his address that in fact later submissions</p> <p>15 would be welcome, so we are grateful for that.</p> <p>16 There is a further factor that is troubling, not</p> <p>17 only the short potential time-line to comment on inquiry</p> <p>18 experts. We are not at the moment informed of the</p> <p>19 basis, although it's been raised already, of the</p> <p>20 concerns raised by the Fire Brigades Union. Now, many</p> <p>21 core participants may wish to consider that.</p> <p>22 Submissions from core participants about matters of</p> <p>23 general concern, such as expert evidence, should be</p> <p>24 circulated to other core participants so that there can</p> <p>25 in fact be an understanding and a dialogue amongst core</p> <p>Page 120</p>

<p>1 participants as to requests that are being made.</p> <p>2 The second point we make about experts, and we note</p> <p>3 this morning this may have been accepted by Mr Millett,</p> <p>4 is that the bereaved, residents and survivor core</p> <p>5 participants should be allowed to engage their own</p> <p>6 experts, engage their own advisors and be allowed the</p> <p>7 space, the time and opportunity to meet with them and go</p> <p>8 to the inquiry with expert reports that they've had time</p> <p>9 to consider and understand.</p> <p>10 It's obvious as we've seen already foreshadowed in</p> <p>11 submissions made by corporate core participants that</p> <p>12 they have the resources and the ability to have recourse</p> <p>13 to their own expert assistance. So we suggest that it</p> <p>14 is made clear by the inquiry that this is an opportunity</p> <p>15 that will be given to core participants from the block</p> <p>16 and from surrounding areas.</p> <p>17 Of course, we don't make the submission without</p> <p>18 thinking about the consequences. This is not going to</p> <p>19 be, we suggest, an opportunity for every single legal</p> <p>20 team, every single firm of solicitors to engage their</p> <p>21 own experts. It is likely and probable that the inquiry</p> <p>22 will expect us to co-operate and act together in</p> <p>23 relation to joint instructions. That is obvious but,</p> <p>24 equally, it is obvious that when doing so that is in</p> <p>25 fact a time-consuming exercise, and the ability of</p> <p style="text-align: center;">Page 121</p>	<p>1 Solicitor. That was published to address concerns about</p> <p>2 the inadequate appreciation of candour and disclosure</p> <p>3 duties by government departments when dealing with</p> <p>4 judicial reviews.</p> <p>5 This document, published in 2010, states that the</p> <p>6 guidance may also be relevant, as we said already, to</p> <p>7 inquests and inquiries. The failure of public</p> <p>8 authorities to appreciate the extent of their duties to</p> <p>9 make reasonable searches and how to go about them is</p> <p>10 a long-running problem.</p> <p>11 If I may just very briefly quote from that document:</p> <p>12 "A public authority's objective must not be to win</p> <p>13 the litigation at all costs, but to assist the court [in</p> <p>14 this case an inquiry] in reaching the correct result and</p> <p>15 thereby to improve standards in public administration."</p> <p>16 We ask that not be forgotten.</p> <p>17 But lawyers for institutional and commercial core</p> <p>18 participants must be reminded of their own fundamental</p> <p>19 duty to ensure that their clients preserve documents and</p> <p>20 make adequate disclosure searches. We have emphasised</p> <p>21 the broad approach to relevancy of documents that is</p> <p>22 required, required also as part of the restoration of</p> <p>23 public confidence, and that that is in fact a wider test</p> <p>24 than standard disclosure under the CPR, the Civil</p> <p>25 Procedure Rules.</p> <p style="text-align: center;">Page 123</p>
<p>1 200-plus core participants, when they want to, to have</p> <p>2 access to experts and consider matters with them is</p> <p>3 something that will take planning.</p> <p>4 So, again, going back to questions that have already</p> <p>5 been foreshadowed about disclosure, the sooner we have</p> <p>6 expert reports that can be considered the better.</p> <p>7 May I then move on, please, to deal with disclosure</p> <p>8 rather more pointedly. This has already been dealt with</p> <p>9 largely by Mr Weatherby. This is page 9 of our written</p> <p>10 submissions.</p> <p>11 SIR MARTIN MOORE-BICK: Yes.</p> <p>12 MR STEIN: We strongly support the proposal that public and</p> <p>13 corporate core participants be required to file</p> <p>14 a statement of their position, including any failing</p> <p>15 that they accept on their own part, and that they must</p> <p>16 be guided by a duty of candour in what they say.</p> <p>17 Now, to an extent the duty of candour is a legal</p> <p>18 phrase that has been used in relation to judicial</p> <p>19 reviews, but the guidance on this applies equally to</p> <p>20 inquiries and inquests.</p> <p>21 The duty of candour is relevant in a second respect,</p> <p>22 to the adequacy of the disclosure exercise. For public</p> <p>23 authority core participants, we urge their adherence to</p> <p>24 the guidance on discharging the duty of candour and</p> <p>25 disclosure that has been set out at 2010 by the Treasury</p> <p style="text-align: center;">Page 122</p>	<p>1 Public confidence will also be assisted by the</p> <p>2 victim and survivor core participants having a proper</p> <p>3 opportunity to engage in the disclosure process. We</p> <p>4 have observed in our written submissions at paragraph 29</p> <p>5 that we have yet to see the original disclosure</p> <p>6 requests. Despite the inquiry having affirmed that</p> <p>7 sight of these might not be problematic, we understand</p> <p>8 this is a matter of some debate at the moment.</p> <p>9 We well appreciate that the inquiry does not wish to</p> <p>10 engage in matters which procedurally will lengthen the</p> <p>11 process, but it is possible, no doubt because the</p> <p>12 inquiry itself is keeping a record in some form of</p> <p>13 schedule or chart form, to potentially have access to</p> <p>14 those enquiries and questions that have been raised so</p> <p>15 far so that gaps that we identify can be identified and</p> <p>16 filled.</p> <p>17 So we look forward to a discussion with the counsel</p> <p>18 to inquiry and solicitor to the inquiry so that we can</p> <p>19 consider the best way to approach that particular</p> <p>20 problem.</p> <p>21 But, as matters stand, the core participants we</p> <p>22 represent have been unable to review the scope of</p> <p>23 disclosure sought from the public authority and</p> <p>24 corporate core participants. Therefore, as things stand</p> <p>25 we've been unable to make any effective submissions on</p> <p style="text-align: center;">Page 124</p>

<p>1 it, and that we suggest is not right.</p> <p>2 We also agree that it is vital that all core</p> <p>3 participants are required to make a proper disclosure</p> <p>4 statement explaining how they have secured the</p> <p>5 preservation of documents, how they've conducted their</p> <p>6 searches and how they have satisfied themselves that</p> <p>7 they have complied in full with their duties. This is</p> <p>8 not just a formality; it serves a vital role in holding</p> <p>9 them to account and enabling fair and meaningful</p> <p>10 engagement from the victim and survivor core</p> <p>11 participants in the disclosure process.</p> <p>12 So Mr Millett has already said this, and we agree</p> <p>13 with him, that in practical terms there should be</p> <p>14 a meeting between representatives to deal with those</p> <p>15 sorts of issues.</p> <p>16 Practical matters in relation to the disclosure</p> <p>17 include the question of what system is going to be used.</p> <p>18 It may well be that this inquiry will use the Relativity</p> <p>19 system that is of assistance in relation to an inquiry</p> <p>20 that we're already part of working with Howe & Co, that</p> <p>21 is the child sexual abuse inquiry. We have learnt</p> <p>22 through using that system that there are some issues</p> <p>23 that need to be grasped. Training in its use is</p> <p>24 welcome. Care needs to be had in terms of loading</p> <p>25 non-searchable documents, and there is a definite need</p> <p style="text-align: center;">Page 125</p>	<p>1 discuss and appropriately inform this inquiry.</p> <p>2 Now, you've already mentioned when discussing</p> <p>3 matters with Mr Mansfield that the inquiry could</p> <p>4 consider the employment of a victim and survivor</p> <p>5 consultative panel. This is a method of engaging people</p> <p>6 with an inquiry that is used by the child sex abuse</p> <p>7 inquiry. It works. It is a layered approach to</p> <p>8 engaging with the community and with core participants</p> <p>9 so that you don't just have a victim and survivor</p> <p>10 consultative panel, you have seminars as well. The</p> <p>11 consultative panel, the way it works normally, is</p> <p>12 allowed a day a week, a day every two weeks or something</p> <p>13 similar to consider the practical steps that are</p> <p>14 currently being taken by the inquiry and what further</p> <p>15 suggestions would help you. The seminars allow for</p> <p>16 people to engage with the ongoing work of the inquiry</p> <p>17 and feed their ideas, not their decisions, again to you.</p> <p>18 That then brings me to decision-making and</p> <p>19 recommendations. This has been addressed variously in</p> <p>20 terms of the phasing suggestion that is being made by</p> <p>21 the inquiry.</p> <p>22 The choice of what is or is not included within any</p> <p>23 phased or module aspect of this inquiry is a matter that</p> <p>24 we will address further in writing, but, as an example,</p> <p>25 the stay-put advice is a matter that we respectfully</p> <p style="text-align: center;">Page 127</p>
<p>1 for indexing to be completed with care and so that it</p> <p>2 can be employed properly.</p> <p>3 The inquiry panel and diversity of membership,</p> <p>4 page 11 of our submissions. This has been addressed</p> <p>5 already. We support the principle that the inquiry</p> <p>6 should in fact incorporate individuals with a background</p> <p>7 that is more representative of the community.</p> <p>8 But there are additional ways -- not instead, but</p> <p>9 additional ways -- to involve victims and survivors in</p> <p>10 this inquiry, examples of which are currently being used</p> <p>11 in the child sexual abuse inquiry. This includes</p> <p>12 a rolling programme of open seminars, facilitated and</p> <p>13 attended by counsel and solicitors to the inquiry.</p> <p>14 Now, this has been successful as part of that</p> <p>15 inquiry process. It allows open and robust discussion</p> <p>16 and debate to be had between core participants and the</p> <p>17 inquiry. It goes further than simply acting as</p> <p>18 a discussion group because the seminars allow themselves</p> <p>19 and people that attend it to be used as a test bed for</p> <p>20 suggestions and, indeed, potential recommendations.</p> <p>21 Let me make this simple point that probably is now</p> <p>22 obvious to you, sir. The community and the tenants are</p> <p>23 the experts in being the service users. They are also</p> <p>24 the people who lost their lives when those services went</p> <p>25 wrong. They deserve the dignity of being able to</p> <p style="text-align: center;">Page 126</p>	<p>1 submit should very much be part of phase 1, if that is</p> <p>2 what you do, sir.</p> <p>3 But all of your work, all of our work, will be lost</p> <p>4 in a library, slowly gathering dust, if it is not</p> <p>5 accompanied by attention given to implementation and</p> <p>6 oversight of change. This means report, yes, where</p> <p>7 required. Come to interim decisions, yes, where</p> <p>8 required. Recognise when change must occur, yes, where</p> <p>9 required. But do not let this go quietly into the good</p> <p>10 night. What you must do, sir, is make sure that change</p> <p>11 is carried through where required. The danger being</p> <p>12 essentially that the inquiry closes without there being</p> <p>13 oversight.</p> <p>14 So, please, sir, when you are getting to the stage</p> <p>15 of considering any recommendation, one of the advantages</p> <p>16 of doing so within the life of the inquiry is that you</p> <p>17 also oversee change and implementation, and that is</p> <p>18 a matter that can be considered during the ongoing work</p> <p>19 of the inquiry.</p> <p>20 Sir, no doubt by now you will be more acutely aware</p> <p>21 than anyone else that the reason why you have been</p> <p>22 appointed to chair this inquiry is so that you can</p> <p>23 examine potentially the failures in the work of others.</p> <p>24 This may be the most difficult work that you and counsel</p> <p>25 to the inquiry have ever undertaken. Much of what will</p> <p style="text-align: center;">Page 128</p>

<p>1 be before you will be unfamiliar, as you'll be having to</p> <p>2 consider the many areas that are within the remit of</p> <p>3 this inquiry and not be afraid to turn over the rocks</p> <p>4 and see what horrors lurk underneath.</p> <p>5 I return to my main theme, which is: do not make the</p> <p>6 mistake of discounting the work and contribution that</p> <p>7 core participants can make to this inquiry. It is</p> <p>8 a mistake to say that they are simply witnesses. They</p> <p>9 are not. The core participants we represent will not</p> <p>10 just bear witness to the circumstances leading up to and</p> <p>11 surrounding the fire at Grenfell Tower on 14 June 2017.</p> <p>12 Those core participants also have opinions about how</p> <p>13 matters can be handled in the future, and their ability</p> <p>14 to be heard on safety matters about relationships with</p> <p>15 the local authority and, of course, about the way that</p> <p>16 fire safety can be delivered in the future will be vital</p> <p>17 to this inquiry's success.</p> <p>18 The core participants we represent have a voice and</p> <p>19 have opinions that are valuable to you. Listen to them</p> <p>20 and please don't reject them.</p> <p>21 Sir, if you do this and your inquiry team are seen</p> <p>22 to be getting to the truth with bravery and conviction,</p> <p>23 you will have support. But, already spoken of by</p> <p>24 others, the gaining of trust by survivors of a tragedy</p> <p>25 of this magnitude, where people's lives have been broken</p> <p style="text-align: center;">Page 129</p>	<p>1 going to divide up some of the topics. The topics</p> <p>2 I would like to address you on are experts, which has</p> <p>3 been touched upon already --</p> <p>4 SIR MARTIN MOORE-BICK: Yes.</p> <p>5 MR THOMAS: -- and also I want to come back to the theme of</p> <p>6 diversity.</p> <p>7 SIR MARTIN MOORE-BICK: Yes, very well.</p> <p>8 MR THOMAS: Sir, it goes without saying that we mustn't lose</p> <p>9 sight of the fact that the victims, the victim core</p> <p>10 participants, should be at the heart of this process.</p> <p>11 In a way, that very much informs the approach that we --</p> <p>12 when I say "we", those of us who represent victim core</p> <p>13 participants -- approach the question of expert</p> <p>14 evidence, and I say that for the following reasons.</p> <p>15 Fundamental to the process of the inquiry is the</p> <p>16 equality of arms. We want to be in a position whereby,</p> <p>17 at the end of this inquiry, we can say to our</p> <p>18 clients: well, regardless of the result, regardless of</p> <p>19 the decision, you had a fair crack of the whip.</p> <p>20 Just pause for one moment, sir, and I say that</p> <p>21 respectfully, and consider that.</p> <p>22 We already know that some of the corporate core</p> <p>23 participants have already started the process of</p> <p>24 engaging their own experts. How do we know that? Well,</p> <p>25 they've said so. They've said so in their submissions</p> <p style="text-align: center;">Page 131</p>
<p>1 and ruined by the very state that appointed you, is not</p> <p>2 easy and it will take time.</p> <p>3 Sir, those are our submissions. Can I assist you</p> <p>4 any further?</p> <p>5 SIR MARTIN MOORE-BICK: No, thank you very much, Mr Stein,</p> <p>6 indeed. Very powerful and helpful submissions. Thank</p> <p>7 you very much.</p> <p>8 Now, Mr Thomas, I think you're to speak next.</p> <p>9 MR THOMAS: I am.</p> <p>10 SIR MARTIN MOORE-BICK: Very good.</p> <p>11 Submissions on behalf of core participants represented</p> <p>12 by Hudgell/Saunders Solicitors/James Solicitors</p> <p>13 by MR THOMAS QC</p> <p>14 MR THOMAS: Good afternoon, sir.</p> <p>15 SIR MARTIN MOORE-BICK: Yes.</p> <p>16 MR THOMAS: Leslie Thomas, and I appear with junior counsel</p> <p>17 Thalia Maragh. We are currently instructed to represent</p> <p>18 17 people, 17 core participants, including bereaved</p> <p>19 families, former residents of the tower, residents of</p> <p>20 the walkway and also a survivor who was neither</p> <p>21 a resident of the tower or the walkway but was visiting</p> <p>22 a friend on the night of the fire.</p> <p>23 I am instructed by three firms of solicitors,</p> <p>24 Hudgells, Saunders Solicitors and James Solicitors.</p> <p>25 Last week we indicated to you, sir, that we were</p> <p style="text-align: center;">Page 130</p>	<p>1 to you.</p> <p>2 The one thing that you know, sir, is that those who</p> <p>3 we represent, our pockets do not run deep. Therefore,</p> <p>4 we are very much dependent on you and your team to</p> <p>5 ensure that we are given a fair crack of the whip when</p> <p>6 it comes to the question of experts. Because, yes, it's</p> <p>7 right that a lot of your inquiry will be taken up with</p> <p>8 the personal accounts, the personal histories, the</p> <p>9 stories as to what happened on that night, but a lot of</p> <p>10 that will be informed by the advice given by experts.</p> <p>11 So let me turn to experts.</p> <p>12 It's important that we have meaningful participation</p> <p>13 in the process of experts, and for there to be</p> <p>14 meaningful participation, it's right and it's important</p> <p>15 that we have disclosure and we have disclosure early.</p> <p>16 Sir, you can't put the cart before the horse. To be</p> <p>17 able to instruct experts properly, we need the</p> <p>18 documents. Why do we need the documents? Because we</p> <p>19 want to be able to ask the right questions of the</p> <p>20 expert.</p> <p>21 Now, that doesn't mean that we need all the</p> <p>22 documents, but we need certainly more documents than we</p> <p>23 have at the moment, which is none. Yes? So that's</p> <p>24 really important.</p> <p>25 It cannot be lost on you or indeed your team that if</p> <p style="text-align: center;">Page 132</p>

<p>1 your aim is to be fair, ensure a full process, 2 a meaningful engagement, there are certain steps that 3 need to be taken before other steps. 4 I'm not going to address you on disclosure because 5 that was done already this morning and you know what the 6 arguments are, but it is important that disclosure 7 cannot be looked at in isolation; it runs hand in hand 8 with the instructions of experts. 9 I'm glad to see, and a lot of my steam was taken 10 away when your counsel this morning gave an indication 11 that many of the concerns that we had are going to be 12 addressed and we thank you for that. I am glad to see 13 that the expert CVs will be provided, that we will have 14 more time to have input in terms of the letters of 15 instructions so that there can be more meaningful 16 engagement in that process. 17 Can I touch, sir, upon some additional and further 18 experts that we would invite you to consider. 19 I've already told you on behalf of the victim core 20 participants of our need to play a full role in this 21 process. Let me add a little bit more meat to the bones 22 when it comes to experts, and you'll see why. 23 In terms of asking questions and, indeed, in terms 24 of knowing whether or not all the disclosure or the 25 right disclosure or whether things may have been missed,</p> <p>Page 133</p>	<p>1 construction; secondly, whether there was a need for 2 other works, after the original construction; and, 3 finally, we would invite you to consider the 2012 to 4 2016 programme of works that was undertaken. We submit 5 that it's very much doubted that a single expert could 6 address all of those issues. 7 Sir, we would invite you to consider in this inquiry 8 the use of an independent environmental health expert. 9 We suggest that sort of expertise is needed in a case 10 such as this. 11 We would also invite you to consider an expert in 12 the management of the aftermath of a disaster, which may 13 have been touched upon this morning. If it has, forgive 14 me, I repeat it. I think it's worth underscoring the 15 point. 16 The final thing I'm going to say about experts 17 before I move on to the second area, because a lot has 18 already been said and I don't want to be repetitious, is 19 the importance that there is a proper timetable put into 20 play which gives us a proper opportunity to consider the 21 documents, consider the disclosure and make meaningful 22 and timely submissions to you and your team. You would 23 expect that in every other legal process. Why should 24 this inquiry be any different? 25 SIR MARTIN MOORE-BICK: Well, I couldn't agree more and I'm</p> <p>Page 135</p>
<p>1 hidden, disappeared, who knows, we needed expert input 2 into that. 3 We would invite you, sir, to also consider the 4 following expertise or expert opinion. 5 On housing construction, that being separate and 6 distinct from refurbishment and maintenance. What you 7 tend to find, sir, is those who are engaged in 8 large-scale projects such as housing construction don't 9 normally deal with the maintenance afterwards; it tends 10 to be separate. 11 SIR MARTIN MOORE-BICK: Yes. 12 MR THOMAS: Therefore, having an expert in the construction, 13 we would invite you to have a separate expert in terms 14 of once the building has been constructed, how it 15 therefore is maintained. Because you tend to find that 16 you know -- I'm not talking about small projects, I'm 17 talking about a large-scale project. 18 SIR MARTIN MOORE-BICK: Yes. 19 MR THOMAS: And, sir, I see you understand the point I am 20 making. 21 In terms of the refurbishment and maintenance, we 22 subdivide that even further. It's important to note 23 that this is not purely about the refurbishment 24 programme, but also can be divided into three areas. 25 Those three areas are as follows: firstly, the original</p> <p>Page 134</p>	<p>1 hoping that, perhaps on the next occasion we meet for 2 directions, you can put the timetable of that sort into 3 place with everyone's contributions. 4 MR THOMAS: I would hope so too. A lot will very much 5 depend, sir, on the first stage, which is getting some 6 disclosure so that we can put some meaning to that 7 timetable. 8 So can I move on to some other matters. 9 The second topic that I wanted to touch upon was 10 diversity. 11 SIR MARTIN MOORE-BICK: Yes. 12 MR THOMAS: The one thing, sir, that must trouble you at 13 night when you close your eyes, before you lay your head 14 down on that pillow, is: what will my legacy be? 15 SIR MARTIN MOORE-BICK: No, I can assure you, Mr Thomas, 16 that that never troubles me! 17 MR THOMAS: I'm not going to suggest it should do! But let's 18 just look at that question: what will my legacy be at 19 the end of this inquiry? And I want to look at that in 20 the context of diversity. 21 Sir, I make no apologies for what I'm about to say, 22 because one of the things that will not be lost on you, 23 or anybody else who sits in this inquiry -- you can see 24 most of the victim core participants because they're 25 sitting right at the back. You couldn't get a more</p> <p>Page 136</p>

<p>1 diverse group of people. Now look at the lawyers. Look 2 at the lawyers who represent predominantly, because of 3 the way you've divided us, the corporate core 4 participants. Even to an extent, look at those of us 5 who represent the victim core participants. Fairly 6 homogenised group, wouldn't you agree? Apart from the 7 odd exception here and there. What must they be 8 thinking in terms of: "Are we going to get justice? Do 9 they understand us?"</p> <p>10 That is why, sir, the submissions that were made to 11 you about the panel, the representation on the panel -- 12 this isn't just lip service, this isn't saying, "I want 13 somebody who looks like me for the sake of somebody who 14 looks like me" -- no, it's much more than that. Does 15 this inquiry pass the smell test?</p> <p>16 What is the smell test on an inquiry such as this? 17 Well, I've already said, look at the suits. I've 18 already told you to look at the victim core 19 participants. I've asked you to take a long hard look 20 at your panel, your assessors, your team, and ask 21 yourself: does it pass the smell test? Because that 22 relates to perception, public perception. Do they 23 understand us? Do they speak our language? Do they 24 know anything about social housing? How many of them 25 have lived in a tower block or on a council estate or in</p> <p style="text-align: center;">Page 137</p>	<p>1 which has been raised by some people earlier this 2 morning.</p> <p>3 SIR MARTIN MOORE-BICK: Yes.</p> <p>4 MR BATES: On the question of the assessors, we accept and 5 acknowledge that you have decided this will not be 6 an inquiry into social housing policy, but you have 7 decided that you will need to look at questions of 8 social housing management. You will need to look at 9 questions of relationships between different kinds of 10 managers, both the council and the TMO, and you will 11 need to look at questions of management as between the 12 managerial bodies and the occupiers. You will also need 13 to look at management and procurement of works 14 programmes.</p> <p>15 We respectfully suggest that your present assessors 16 don't give you the expertise you would require in those 17 fields. Mr Montgomery is a noted urban regeneration 18 specialist but, at the risk of oversimplifying, his 19 experience is to identifying which estate and which 20 block needs work, not how you do that.</p> <p>21 Ms Redfearn does have local government experience, 22 but not directly housing management experience. The 23 inquiry website flags up her time at Wigan, but Wigan of 24 course manage their housing stock through what's called 25 an ALMO, an arm's length management organisation, and at</p> <p style="text-align: center;">Page 139</p>
<p>1 social housing?</p> <p>2 That affects confidence. Confidence or lack of it 3 affects participation. And a lack of participation from 4 the very people who matter will affect justice. And 5 a lack of justice is injustice.</p> <p>6 That's all I have to say, sir. Thank you very much.</p> <p>7 SIR MARTIN MOORE-BICK: Well, thank you very much for your 8 submissions.</p> <p>9 Now, my running order, which may not look like 10 yours, suggests that Mr Bates, who is here for 11 Russell-Cooke, had asked to address me next. Is 12 Mr Bates here and ready?</p> <p>13 MR BATES: I can do it.</p> <p>14 SIR MARTIN MOORE-BICK: You had better do your bit, 15 Mr Bates. Thank you.</p> <p>16 Submissions on behalf of core participants represented 17 by Russell-Cooke by MR BATES</p> <p>18 MR BATES: Yes, sir, my name is Justin Bates. I'm standing 19 in for Mr Arden QC, who can't be available today. We're 20 instructed by Russell-Cooke on behalf of three core 21 participants.</p> <p>22 There are just three brief areas I would like to 23 address you on, if I may: the first concerns your 24 assessors, the second concerns your experts and the 25 third is to pick up a question about the housing file</p> <p style="text-align: center;">Page 138</p>	<p>1 the risk of telling you what you may already know, where 2 one has an ALMO, the effect of that is to put an 3 additional layer of bureaucracy between the council and 4 the management of its stock. So identifying one's 5 experience in relation to having worked for a council 6 who has an ALMO is to in fact flag up the lack of 7 experience one has in social housing management.</p> <p>8 As we said in our written submissions, we 9 respectfully suggest that this inquiry would benefit 10 from someone with active experience of housing 11 management and, particularly, tenant involvement in 12 social housing management. We've suggested that 13 an additional assessor should be appointed, namely 14 a tenant who has experience of the management of social 15 housing. We've given some suggestions as to where one 16 might find one of those in our written materials.</p> <p>17 Secondly, on the question of experts, part of what 18 I say will be picked up later on tomorrow by the FBU, 19 but respectfully we ask you to approve at a very early 20 stage funding to allow core participants collectively, 21 as was indicated earlier, to identify experts to assist 22 now. Firstly, to comment on and suggest improvements to 23 the letter of instructions, and your counsel this 24 morning indicated he'd welcome that kind of input. But, 25 respectfully, the lawyers in the room don't have the</p> <p style="text-align: center;">Page 140</p>

<p>1 experience to assist with what should go into those</p> <p>2 instructions.</p> <p>3 Secondly, as Mr Thomas just alluded to, to assist</p> <p>4 with monitoring of the disclosure process, so at a very</p> <p>5 early stage experts can indicate what, if any, classes</p> <p>6 of documents they would expect to see that have not yet</p> <p>7 been identified.</p> <p>8 Thirdly, to ensure that all relevant lines of</p> <p>9 enquiry are pursued. So you've seen the FBU submission,</p> <p>10 for example, asking, quite correctly in our submission,</p> <p>11 why no one has been asked to comment on part 1 of the</p> <p>12 Housing Act 2004. Part 1 of the Housing Act 2004, as</p> <p>13 I'm sure you know, sir, is effectively now the standard</p> <p>14 against which housing should be judged, replacing the</p> <p>15 old fitness regime under the old 1985 Act.</p> <p>16 That is something that the lawyers can identify, but</p> <p>17 in terms of the questions to be asked, in terms of the</p> <p>18 material to be explored, the core participants and their</p> <p>19 lawyers need access to people who actually use that</p> <p>20 material on a daily basis to feed into the relevant</p> <p>21 questions.</p> <p>22 At the risk of simplifying it enormously, the</p> <p>23 lawyers in the room, certainly the housing lawyers, can</p> <p>24 litigate about part 1 issues, but an environmental</p> <p>25 health officer applies them on a daily basis and</p> <p style="text-align: center;">Page 141</p>	<p>1 should be a compelling reason for doing so rather than</p> <p>2 an obligation on our clients to explain why information</p> <p>3 that they themselves generated should not have been made</p> <p>4 available.</p> <p>5 That was all we wanted to say. I'm very grateful.</p> <p>6 SIR MARTIN MOORE-BICK: Well, I'm grateful. That was very</p> <p>7 concise. Thank you very much.</p> <p>8 Now, Imran Khan & Partners made some submissions in</p> <p>9 writing. Is there anyone here who would like to speak</p> <p>10 on their behalf? Please come along then.</p> <p>11 Submissions on behalf of core participants represented</p> <p>12 by Imran Khan & Partners by MS ELLIS</p> <p>13 MS ELLIS: Sir, may I offer my apologies, first of all, for</p> <p>14 my colleague Imran Khan, who was scheduled to speak</p> <p>15 today but was wanted in Sheffield for a trial which has</p> <p>16 run over. My apologies.</p> <p>17 SIR MARTIN MOORE-BICK: Thank you for standing in.</p> <p>18 MS ELLIS: You're very welcome, sir.</p> <p>19 SIR MARTIN MOORE-BICK: When you are ready.</p> <p>20 MS ELLIS: Sir, I intend to make my submissions extremely</p> <p>21 brief this afternoon.</p> <p>22 SIR MARTIN MOORE-BICK: I'm sorry, I don't have a note of</p> <p>23 your name, which is probably my fault.</p> <p>24 MS ELLIS: Yes, it's Ms Ellis.</p> <p>25 SIR MARTIN MOORE-BICK: Thank you.</p> <p style="text-align: center;">Page 143</p>
<p>1 understands what material to be looking for.</p> <p>2 Thirdly was that the housing file -- if I may so,</p> <p>3 the housing file should be regarded as the Bible in the</p> <p>4 case of each tenant's occupation. It's everything that</p> <p>5 the authority or the other class of landlord holds about</p> <p>6 you, everything you've sent them, everything you've</p> <p>7 forgotten you've sent them will be on that housing file.</p> <p>8 It will assist the solicitors and counsel assisting them</p> <p>9 in understanding the background to their clients. It</p> <p>10 will assist the individual clients in reminding them</p> <p>11 what they raised at earlier times and what points</p> <p>12 they've raised.</p> <p>13 It's not simply, or it shouldn't be, a repair log.</p> <p>14 It can be everything. Any letter that a councillor once</p> <p>15 wrote on your behalf, anything you sent five years ago.</p> <p>16 In the case of a good file, it may even contain</p> <p>17 transcripts of phone calls you have had with your</p> <p>18 landlord.</p> <p>19 At the risk again of playing my hand slightly, in</p> <p>20 every housing case being heard by a District Judge up</p> <p>21 and down this country today there will have been</p> <p>22 an order for disclosure of a housing file. It's</p> <p>23 inconceivable as a housing lawyer that I would ever</p> <p>24 approach a case without having seen my client's file.</p> <p>25 Respectfully, if they're not to be disclosed, there</p> <p style="text-align: center;">Page 142</p>	<p>1 MS ELLIS: I appear from Imran Khan & Partners on behalf of</p> <p>2 23 core participants, who are both resident, survivors</p> <p>3 and family members of deceased parties.</p> <p>4 SIR MARTIN MOORE-BICK: Yes, thank you very much.</p> <p>5 MS ELLIS: The submissions that we had intended to make</p> <p>6 today, a large part of them have been adopted in the</p> <p>7 submissions made by those who precede me and I don't</p> <p>8 intend to repeat those. So I am instructed here in</p> <p>9 particular by those attending today just to underline</p> <p>10 really two key points.</p> <p>11 SIR MARTIN MOORE-BICK: Yes.</p> <p>12 MS ELLIS: The first is simply to join others who have been</p> <p>13 represented earlier in the day today in pleas for</p> <p>14 members of the community to be part of a decision-making</p> <p>15 panel rather than a consultative panel. In particular,</p> <p>16 I endorse the submissions of Mr Mansfield that that</p> <p>17 distinction is important.</p> <p>18 I don't need to repeat the submissions of those</p> <p>19 preceding me as to the importance of core participants</p> <p>20 playing an active role in this inquiry, but I would</p> <p>21 invite you, sir, to consider that these are individuals</p> <p>22 who have been feeling, or many of them have been feeling</p> <p>23 for a number of years that their concerns about fire</p> <p>24 safety in Grenfell Tower were not considered, and who,</p> <p>25 on initial meetings after the crisis, came back again</p> <p style="text-align: center;">Page 144</p>

<p>1 and again -- I speak as a solicitor who met with those 2 individuals at an early stage -- to everything that they 3 had done to try and raise fire safety issues at 4 Grenfell Tower, some of them over a period of years, and 5 also to the efforts that they had made in some cases on 6 the night itself to save those within their family. 7 Mr Chairman, you'll be minded very much of the 8 importance that they are heard, but it is, I would say, 9 a vital opportunity to empower those individuals by 10 allowing them to feel part of the decision-making 11 process. They already feel that they're going to be 12 asked to give a great deal in this inquiry. Many of 13 them feel exhausted by the day-to-day effort of 14 surviving in hotel rooms, and in the many processes of 15 their grief. 16 I would suggest that it would be perhaps 17 a groundbreaking opportunity for members of a community 18 who have not had an opportunity to influence public 19 policy previously to do so, and that that in turn would 20 benefit the inquiry and wider society. 21 Reference has been made already today to the 22 Macpherson/Lawrence Inquiry and the importance of 23 a diverse panel in ensuring the community's trust and 24 confidence in that inquiry. My firm continues to be 25 instructed by Doreen Lawrence, the mother of</p> <p style="text-align: center;">Page 145</p>	<p>1 I say that with the greatest respect, sir, but what 2 I mean is that we know from our experience of inquiries, 3 and some of which my firm has been instructed in 4 relation to, and others in the room today will be able 5 to testify their experiences in relation to the 6 Hillsborough inquiry and the defensiveness of 7 institutions over a period of years where there was 8 culpability attributed early on. 9 My firm was instructed in the undercover policing 10 inquiry and it was reported over one year into that 11 inquiry that files containing undercover police 12 officers' intelligence had been destroyed. We have 13 referred to that briefly in our submissions at 14 paragraph 4. It's not to tap the present inquiry team 15 on the knuckles and tell them to get their act together, 16 I appreciate what is being done, but our feeling is that 17 if a tranced approach to disclosure is made so that 18 things can get going, the process can get going early 19 on, that will enable not only greater confidence in the 20 inquiry but also opportunity to identify early on gaps 21 in disclosure. 22 I do endorse and reiterate the submission made by 23 Mr Weatherby today that we are at a loss to understand 24 why we cannot have access to the letters that go out, 25 save that I appreciate in every request for disclosure</p> <p style="text-align: center;">Page 147</p>
<p>1 Stephen Lawrence, and the family remembers to this day, 2 20 years on from the inquiry, while they continue to 3 fight in investigations concerning the police's conduct 4 all those years ago, the inquiry as a crucial turning 5 point in their campaign towards justice. The key reason 6 for that, Baroness Lawrence feels very strongly, is that 7 the family not only had trust and confidence in the 8 panel and in the inquiry throughout the process because 9 of the appointment of a panel early on, but also that 10 the outcomes of that inquiry were nuanced and properly 11 contextualised because of the important input that 12 having more people and a more diverse background was 13 able to ensure. 14 Sir, the only other matter on which I have been 15 instructed to address you very briefly today is on the 16 issue of early disclosure, about which many other 17 individuals on this stand today have spoken already. 18 This arises not just, I would say, from the needs and 19 priorities of core participants who are now considering 20 their own witness evidence, but also from a legitimate 21 fear, if not a scepticism, that disclosure throughout 22 this inquiry will be selective and perhaps incomplete, 23 and it will be a process to get to a point where members 24 of the public feel that there has been full or 25 approximately full disclosure.</p> <p style="text-align: center;">Page 146</p>	<p>1 it would delay potentially the process to the hindrance 2 of the inquiry were core participants to input at each 3 disclosure request, given the volume of those requests. 4 But I would suggest for there to be a review process at 5 least routinely for core participants and their 6 solicitors, those affected, to review the wording of 7 those letters, to input in them when it seems necessary 8 and to ask for clarification in terms of categories of 9 documents that are being requested. I think that really 10 would serve greatly to reassure our clients and their 11 representatives. 12 Sir, I think that's all I had to address you on 13 today. 14 SIR MARTIN MOORE-BICK: All right. Well, thank you very 15 much indeed. 16 Next on my list I have Mr Johnson appearing for core 17 participants represented by Oliver Fisher. 18 Submissions on behalf of core participants represented 19 by Oliver Fisher Solicitors by MR JOHNSON 20 MR JOHNSON: Yes, my name is Lindsay Johnson, together 21 Jim Shepherd. We are instructed by Oliver Fisher in 22 respect of a number of residents of the tower and the 23 walkway, including disabled residents on the newly 24 refurbished first floor of the tower, who will bring 25 a further dimension, we believe, to the evidence in</p> <p style="text-align: center;">Page 148</p>

<p>1 terms of the concerns over that refurbishment and</p> <p>2 its relationship to the fire.</p> <p>3 The advantage of speaking at the end of the day is</p> <p>4 that you've had the benefit of hearing the submissions</p> <p>5 made by others. Those comments that we've heard today</p> <p>6 build on the collaborative approach that there has been</p> <p>7 between those who act for the core participants and who</p> <p>8 are survivors of the fire, and we hope to continue that</p> <p>9 co-operation as matters progress.</p> <p>10 We welcome the update from counsel to the inquiry</p> <p>11 and the advances which he set out first thing this</p> <p>12 morning, which addressed a number of concerns we raised</p> <p>13 in our submissions and that were raised more generally.</p> <p>14 We agree in broad terms with much of what has been</p> <p>15 said so far today by counsel, but, in particular, we</p> <p>16 wish to associate ourselves with the comments of</p> <p>17 Mr Friedman in general and Mr Weatherby on the specific</p> <p>18 issue of disclosure. We also expressly agree with the</p> <p>19 points on experts made by Mr Thomas and the need for an</p> <p>20 expert on property maintenance.</p> <p>21 But for two short points which have been the subject</p> <p>22 of Mr Bates's submissions, there would be no need for us</p> <p>23 to trouble the inquiry with oral submissions at all.</p> <p>24 But we do need to emphasise two, we would say, related</p> <p>25 points.</p> <p style="text-align: center;">Page 149</p>	<p>1 provide any complaint made by tenants as to the issue of</p> <p>2 disrepair and the functioning of fire safety equipment</p> <p>3 and what steps were taken to address those concerns.</p> <p>4 That's important not just in respect of the tower</p> <p>5 and the dwellings in the tower itself, but also in</p> <p>6 relation to the walkway, where there are some concerns</p> <p>7 and some issues raised in relation to gas safety issues,</p> <p>8 which it is said by some were ignored and which you will</p> <p>9 want to consider when determining the cause of the fire.</p> <p>10 As noted by many including Ms Munroe today, there</p> <p>11 are those who believe that the cause of the fire was</p> <p>12 preventable. The housing file will demonstrate whether</p> <p>13 there were relevant concerns raised, by whom and their</p> <p>14 relevance to the issues raised under phase 1. In that</p> <p>15 sense, such disclosure is tied to effective</p> <p>16 participation and openness.</p> <p>17 We'd therefore respectfully submit that disclosure</p> <p>18 of the individual housing files is essential, and</p> <p>19 I agree with Mr Bates that it is inconceivable that it</p> <p>20 would not be.</p> <p>21 They were the only two issues on which we wished to</p> <p>22 make submissions.</p> <p>23 SIR MARTIN MOORE-BICK: That's all you'd like to say at this</p> <p>24 stage? Thank you very much indeed.</p> <p>25 Now, I had some slightly late submissions from</p> <p style="text-align: center;">Page 151</p>
<p>1 First, we agree with the submission of</p> <p>2 Russell-Cooke, which was alluded to by Mr Mansfield,</p> <p>3 that there is a need for an assessor with experience of</p> <p>4 social housing management, in particular tenant</p> <p>5 participation in housing management. That is essential,</p> <p>6 as it brings a degree of expertise that is currently</p> <p>7 lacking.</p> <p>8 The difficulty perhaps here is that housing is</p> <p>9 something everyone believes themselves to know something</p> <p>10 about, we all have some involvement with it, but</p> <p>11 unfortunately we do not. We are concerned that that is</p> <p>12 overlooked. In our submission, an assessor is essential</p> <p>13 to assist the understanding of the inquiry and to enable</p> <p>14 you to get to the answers you need to get to.</p> <p>15 The second issue relates to disclosure. Counsel to</p> <p>16 the inquiry asked for clarification as to why disclosure</p> <p>17 of the housing file is important. Mr Friedman noted</p> <p>18 that the housing file will address who was in the</p> <p>19 property and will assist the inquiry in that regard.</p> <p>20 Of course, as Mr Bates pointed out, the housing file</p> <p>21 is much more than that. Counsel to the inquiry in</p> <p>22 opening pointed out in the context of expert reports for</p> <p>23 phase 1 that there is a need to understand the fire</p> <p>24 safety measures and how they performed. Well,</p> <p>25 the housing file will contain that information. It will</p> <p style="text-align: center;">Page 150</p>	<p>1 Mr Westgate, who is appearing for a Mr Shahid Ahmed. Is</p> <p>2 Mr Westgate here?</p> <p>3 Mr Westgate, I'm sorry we had to put you in last,</p> <p>4 but you probably understand the reason.</p> <p>5 Submissions on behalf of Mr Shahid Ahmed by MR WESTGATE</p> <p>6 MR WESTGATE: Yes, sir. Yes, we do and we are grateful to</p> <p>7 have the opportunity to speak.</p> <p>8 One of the advantages, I suppose, of going last is</p> <p>9 the more people say, the less you have to say at the</p> <p>10 end. As Mr Johnson has just pointed out, that is</p> <p>11 an illustration of how effective the co-operation</p> <p>12 between the core participants has operated and something</p> <p>13 that we hope will continue.</p> <p>14 I only want to make three points, one about phasing,</p> <p>15 one about assessors and one about expert evidence.</p> <p>16 So far as phasing is concerned, you've heard a great</p> <p>17 deal of submissions about the appropriateness of</p> <p>18 maintaining the phasing idea. We've said some things</p> <p>19 about that in our written submissions and I don't</p> <p>20 propose to repeat those.</p> <p>21 I just want to make a point about the utility of</p> <p>22 continuing with the phasing idea. In particular, if</p> <p>23 phasing does continue, it raises a question about the</p> <p>24 status of findings in phase 1, particularly if decisions</p> <p>25 that have been made in that phase, even on a provisional</p> <p style="text-align: center;">Page 152</p>

<p>1 basis, end up being made without full information that 2 then end up being undermined in phase 2. That's a very 3 real possibility, particularly as the process of more 4 detailed consideration in phase 2 may throw up all sorts 5 of things that simply hadn't occurred during phase 1. 6 That, when the phasing proposal was first put 7 forward, what was a necessary difficulty which would 8 simply have to be worked around because of the urgency 9 that then existed. Of course that urgency hasn't gone 10 away and of course there is still a pressing need to 11 reach early recommendations about safety where 12 necessary. But as the other parties have made clear, 13 there are other ways of addressing that particular 14 problem in the course of the inquiry. 15 The virtue of moving away from phasing is that it 16 does give the opportunity to get on with the thing which 17 is the key concern, which is: how could this have 18 happened? 19 That also has a knock-on point about the involvement 20 of some core participants because there are some 21 participants who may feel unable or unready to talk 22 about the events of the fire itself, but who may have 23 a great deal to say about the way in which the block was 24 managed before then. Of course, if they have to wait 25 until phase 2, they have to wait, and those important</p> <p>Page 153</p>	<p>1 So we support the point made that there should be 2 assessor expertise directed particularly to housing 3 management. 4 The third point deals with experts. The inquiry of 5 course is instructing its own experts and it is welcome 6 to hear from counsel to the inquiry this morning that 7 they are sympathetic to the idea of core participants 8 instructing in due course their own experts. Of course 9 that will be something which will have to be carefully 10 handled and co-ordinated. 11 But there is of course an intermediate stage, 12 because it may well be that the core participants may 13 want to put questions to the inquiry's experts, perhaps 14 in writing, perhaps at a hearing, but in order to do 15 that they will need to have the assistance of 16 expertise in order to understand the highly technical 17 material that has been put before them, and to formulate 18 appropriate questions. 19 The only point I make there -- and it's not 20 something where we can ask for a particular direction -- 21 is it's important that the core participants must be 22 appropriately supported and resourced to be able to make 23 sense of the report and to comment on them. As I say, 24 we can't ask for a direction, all we can really ask for 25 is to make the point in advance that we hope for</p> <p>Page 155</p>
<p>1 concerns of theirs are delayed in their resolution and 2 delayed in their having an opportunity to participate in 3 the inquiry. That's all I want to say about phasing. 4 The second point is about assessors, and here I can 5 really follow on from what Mr Bates and Mr Johnson have 6 just said about the importance of having assessor 7 expertise with current practical housing management 8 experience. It's the thrust of a recommendation which 9 I understand is going to be made tomorrow by the FBU as 10 well. 11 That's something which is of particular interest to 12 those like Mr Ahmed, who I represent, who was the 13 chairman of the leaseholders association, and who can 14 speak to the relationship between him and the TMO and 15 the authority about works and about addressing safety 16 concerns. It's important that you have an assessor who 17 is able to evaluate the response to those matters, and 18 will also be able to inform what practical solutions or 19 practical recommendations this inquiry can make in its 20 report. 21 It also, importantly, goes to the point that was 22 made earlier about the tenants having been 23 systematically overlooked or ignored in the past, and 24 again an assessor will be able to bring a valuable 25 viewpoint on that.</p> <p>Page 154</p>	<p>1 a flexible and realistic approach when requests for 2 assistance are made. 3 Those are the only points I wish to make. 4 SIR MARTIN MOORE-BICK: Thank you very much indeed. 5 Yes, thank you. 6 We've reached this point somewhat earlier than we 7 had expected or thought we might. Before I take 8 anything further, can I just check that there's no one 9 else here representing survivors, bereaved or residents 10 who was expecting to speak and hasn't been asked or 11 invited to do so? Good, all right. 12 Well, the question then is whether we call a halt 13 for today. It has been a longish day, it's quite warm 14 in here, and I suspect that Mr Maxwell Scott, who is 15 next on the list, would rather start in the morning. Is 16 that -- 17 MR MAXWELL-SCOTT: I would prefer to start in the morning, 18 sir, but I am entirely in your hands. 19 SIR MARTIN MOORE-BICK: Yes. We've got plenty of time in 20 the diary tomorrow, unless anyone is going to stand up 21 and tell me that the time they've been allotted isn't 22 enough? No. 23 Well, in that case I think the best thing is for me 24 to rise now. Thank you all for your assistance, which 25 has been considerable. Thank you all for being so</p> <p>Page 156</p>

<p>1 concise, which is always welcome.</p> <p>2 We shall sit again tomorrow at 10.30 and take it on</p> <p>3 from there. All right?</p> <p>4 Thank you very much indeed.</p> <p>5 (3.40 pm)</p> <p>6 (The hearing adjourned until Tuesday, 12 December 2017</p> <p>7 at 10.30 am)</p> <p>8</p> <p>9</p> <p>10</p> <p>11</p> <p>12</p> <p>13</p> <p>14</p> <p>15</p> <p>16</p> <p>17</p> <p>18</p> <p>19</p> <p>20</p> <p>21</p> <p>22</p> <p>23</p> <p>24</p> <p>25</p> <p>Page 157</p>	<p>participants represented</p> <p>by Imran Khan & Partners by MS</p> <p>ELLIS</p> <p>Submissions on behalf of core148</p> <p>participants represented</p> <p>by Oliver Fisher Solicitors by</p> <p>MR JOHNSON</p> <p>Submissions on behalf of Mr Shahid152</p> <p>Ahmed by MR WESTGATE</p> <p>Page 159</p>
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