

<p>1 Monday, 10 September 2018</p> <p>2 (10.00 am)</p> <p>3 SIR MARTIN MOORE-BICK: Good morning, everybody. Welcome to</p> <p>4 today's hearing.</p> <p>5 We are still on firefighter evidence, so in a moment</p> <p>6 we are going to call the first of quite a long list of</p> <p>7 firefighter witnesses for today.</p> <p>8 Is that right, Mr Kinnier?</p> <p>9 MR KINNIER: Yes, sir, good morning. The first of the seven</p> <p>10 witnesses we have for today is Crew Manager Ben</p> <p>11 Gallagher.</p> <p>12 SIR MARTIN MOORE-BICK: Thank you.</p> <p>13 BEN GALLAGHER (affirmed)</p> <p>14 Questions by MR KINNIER</p> <p>15 SIR MARTIN MOORE-BICK: Thank you very much, Mr Gallagher.</p> <p>16 Take a seat and make yourself comfortable.</p> <p>17 Yes, Mr Kinnier.</p> <p>18 MR KINNIER: Good morning.</p> <p>19 First of all, can you confirm your name for the</p> <p>20 record?</p> <p>21 <b>A. Ben Gallagher.</b></p> <p>22 Q. Good morning, Mr Gallagher. Thank you very much for</p> <p>23 coming along to give evidence today.</p> <p>24 First of all, you should have in front of you a blue</p> <p>25 folder, and if you open it up to the first tab in that</p> <p style="text-align: center;">Page 1</p>	<p>1 say so, it's not a problem.</p> <p>2 <b>A. Okay.</b></p> <p>3 Q. If we could start with some basic information.</p> <p>4 First of all, at the time of the fire, it's right</p> <p>5 you were a crew manager stationed at Paddington fire</p> <p>6 station?</p> <p>7 <b>A. Yes, that's correct.</b></p> <p>8 Q. At the time of the fire, you had 11 years' experience as</p> <p>9 a firefighter; is that right?</p> <p>10 <b>A. Yes, that's correct.</b></p> <p>11 Q. On the night, you rode on the pump ladder appliance</p> <p>12 whose call sign was Alpha 212; is that right?</p> <p>13 <b>A. Yes.</b></p> <p>14 Q. Now, as to timings, the LFB has given us some records</p> <p>15 which indicate that Alpha 212 was mobilised at 01.15,</p> <p>16 mobile at 01.17 and arrived at the scene 01.26.</p> <p>17 Do those timings sound about right to you?</p> <p>18 <b>A. Yes.</b></p> <p>19 Q. Finally, in respect of timings, the LFB has also given</p> <p>20 us records of your SDBA wear, which indicate that the</p> <p>21 SDBA was disconnected from the appliance at 01.25 and</p> <p>22 that your initial tally out at the bridgehead was 01.42.</p> <p>23 Again, does that sound about right?</p> <p>24 <b>A. Yes. I can't remember, to be honest.</b></p> <p>25 Q. Okay.</p> <p style="text-align: center;">Page 3</p>
<p>1 folder, there will be your statement dated 11 January of</p> <p>2 this year. Is that right?</p> <p>3 <b>A. Yes, that's correct.</b></p> <p>4 Q. If you turn to the next tab in that folder, there should</p> <p>5 be your contemporaneous note.</p> <p>6 <b>A. Yes, that's correct.</b></p> <p>7 Q. And if you turn over a final tab, there should be</p> <p>8 a pro forma appendix A following on from your</p> <p>9 contemporaneous notes?</p> <p>10 <b>A. Yes, that's correct.</b></p> <p>11 Q. Thank you.</p> <p>12 Have you read those documents recently?</p> <p>13 <b>A. Yes.</b></p> <p>14 Q. Do you confirm their contents are true?</p> <p>15 <b>A. Yes.</b></p> <p>16 Q. Are you content for those documents to stand as your</p> <p>17 evidence to the inquiry?</p> <p>18 <b>A. Yes, I do.</b></p> <p>19 Q. Now, Mr Gallagher, I'm not going to be going through</p> <p>20 every line in your statement, just drawing out</p> <p>21 particular topics, and in particular your experiences on</p> <p>22 the three times you entered the tower on the night.</p> <p>23 If at any time I ask a question that's unclear, say</p> <p>24 so and I'll try and put it properly and clearly.</p> <p>25 But also, if at any time you want a break, please</p> <p style="text-align: center;">Page 2</p>	<p>1 The first matter I'd like to talk to you about is</p> <p>2 your first entry into the tower. If I could ask you to</p> <p>3 turn to your witness statement. Mr Gallagher, it's</p> <p>4 probably easier -- you'll see next to you a screen, and</p> <p>5 Paul, the document manager, will flash up your</p> <p>6 statement. It's probably easier to read on there and</p> <p>7 expand the relevant extract I'd like you to look at.</p> <p>8 Could I ask you to look at the last paragraph and</p> <p>9 the last line on that page. You say this:</p> <p>10 "I went in the front lobby of the building where</p> <p>11 a watch manager was positioned, I do not know his name.</p> <p>12 I asked him what he needed he said just hold fire for a</p> <p>13 minute."</p> <p>14 Are you able to identify the watch manager now?</p> <p>15 <b>A. No, I'm not.</b></p> <p>16 Q. Was it clear to you at the time why he asked you to hold</p> <p>17 back for a minute?</p> <p>18 <b>A. That normally happens because they're</b></p> <p>19 <b>information-gathering, so we can be detailed correctly.</b></p> <p>20 Q. Can you remember whether there were any other crews</p> <p>21 going up at the time whilst you were being asked to hold</p> <p>22 fire for a minute?</p> <p>23 <b>A. No, he was the only person I saw.</b></p> <p>24 Q. If I could ask you to turn over the page to page 5 of</p> <p>25 your statement, you say:</p> <p style="text-align: center;">Page 4</p>

<p>1 "I asked him if the lifts had been secured, he told 2 me they hadn't so I said 'No worries I will get that.'" 3 Did the watch manager indicate that he did not know 4 whether the lifts had been secured yet? 5 <b>A. I think, to be honest, he just said something along the 6 lines of, "Yeah, go and try and secure the lift", yeah. 7 After I'd said it, he agreed, so I don't know if he was 8 there first of all.</b> 9 Q. So he didn't give you any explanation as to why they 10 might not have been secured already? 11 <b>A. No, nothing else.</b> 12 Q. You went to the lift, and you say that you were pretty 13 sure that you used your drop key to secure the lifts. 14 Are you sure that you used your drop key and that 15 there wasn't a key already in place? 16 <b>A. No, I used my drop key, but I also pressed the button as 17 well.</b> 18 Q. When you operated the drop key, did you feel or hear 19 a click? 20 <b>A. No, I can't remember, but that's not unusual.</b> 21 Q. Were you satisfied that the key was turned to the fire 22 control "on" position? 23 <b>A. No, all I know is that the lift came down or the doors 24 opened, so whether it went into fire lift mode or not, 25 I can't tell you.</b></p> <p style="text-align: center;">Page 5</p>	<p>1 <b>A. No, I didn't.</b> 2 Q. Did you take any steps to stop the lifts being used? 3 <b>A. No, I just remember -- I was with the watch manager and 4 I just remember saying, "Well, we won't be using the 5 lifts, then", and then we went back out into the lobby 6 and then things just moved quite quickly from there, so 7 there wasn't -- no, the thought didn't really come into 8 my mind.</b> 9 Q. Did you see the watch manager do anything to stop the 10 lifts being used when you were still within his 11 vicinity? 12 <b>A. No, I didn't, no.</b> 13 Q. You then went outside the tower, if that's right. 14 If I could ask you to turn to page 6 of your witness 15 statement and the top paragraph there. You describe 16 going outside of the tower to check the back of the 17 building, and that you saw people shouting out from 18 different floors, but it was difficult to make out from 19 which floor. 20 Now, around that time, do you recall Mr Tillotson 21 coming to the view that there needed to be an early 22 evacuation? 23 <b>A. No, there wasn't -- I mean, it was such sort of 24 pandemonium from up in the windows that it wasn't 25 a conversation that we were having. We were trying to</b></p> <p style="text-align: center;">Page 7</p>
<p>1 Q. You can't remember whether the fire control light came 2 on or not? 3 <b>A. No.</b> 4 Q. In the third paragraph on page 5, you describe what 5 you've intimated there, the fact that the lift opened 6 and "a great big plume of black smoke came straight into 7 me". 8 First of all, can you remember which lift opened and 9 from which lift the plume of smoke came out? 10 <b>A. I believe it was the right-hand side one.</b> 11 Q. Given the plume of smoke came out, what did you think at 12 the time that this indicated about the likely smoke 13 conditions within the tower? 14 <b>A. To be honest, I just immediately thought it was very 15 strange that the lift was full of smoke. At the time it 16 seemed as though the smoke came down as the door was 17 opened. So I actually thought that it was maybe in the 18 lift shaft.</b> 19 Q. I suppose the next question is: have you encountered 20 that phenomenon before? Is it unusual to have such 21 a great big plume of black smoke emerge from the lift 22 when you open it? 23 <b>A. Never to the amount that came out, no.</b> 24 Q. At the time, did you think what the effect might be on 25 evacuation of the building?</p> <p style="text-align: center;">Page 6</p>	<p>1 <b>keep people calm from down there and just explain that 2 we were coming to get them.</b> 3 Q. Do you remember having any conversation or, indeed, just 4 overhearing Mr Tillotson talk to anyone else about the 5 need for evacuation at this stage in the evening? 6 <b>A. I didn't, no.</b> 7 Q. Now, you say at, again, page 6 of your witness statement 8 in line 6 of that top paragraph, that in response to the 9 occupants shouts you, a firefighter from your machine 10 and another from Hammersmith "shouted to them to stay 11 where they were and asked what flat they were in". 12 What did you do with the information shouted down to 13 you from the occupants within the tower? 14 <b>A. To be honest, I think it was probably a little bit 15 fruitless shouting that because we just couldn't hear 16 them or understand them. Or I couldn't, anyway.</b> 17 Q. Could you tell whether the other firefighter from your 18 appliance or whether the firefighter from Hammersmith 19 were able to make out what was being shouted to you? 20 <b>A. I don't know.</b> 21 Q. If I can turn to the bridgehead. 22 After you'd inspected the back and front of the 23 tower, is it right that you went to the bridgehead? 24 <b>A. Yes, that's correct.</b> 25 Q. At that point, was the bridgehead giving out orders to</p> <p style="text-align: center;">Page 8</p>

<p>1 search and rescue, can you remember?</p> <p>2 <b>A. No. We went to the bridgehead, there was quite a --</b></p> <p>3 <b>there was -- I think there was five of us who went to</b></p> <p>4 <b>the bridgehead, so where it was was very small. So, no,</b></p> <p>5 <b>I wasn't right at the front, so I don't know what the</b></p> <p>6 <b>discussion really was, no.</b></p> <p>7 Q. Was Mr Tillotson one of the five that went up to the</p> <p>8 bridgehead at that time?</p> <p>9 <b>A. Yes, he was.</b></p> <p>10 Q. How far in front of you was he, if he was in front of</p> <p>11 you?</p> <p>12 <b>A. Maybe 2 metres.</b></p> <p>13 Q. Could you hear what he was saying to those in charge of</p> <p>14 the bridgehead?</p> <p>15 <b>A. I just heard him explain that there's people hanging out</b></p> <p>16 <b>the back of the tower, shouting for help, and we needed</b></p> <p>17 <b>to go up and get them.</b></p> <p>18 Q. He was emphasising search and rescue; is that a fair way</p> <p>19 to describe it?</p> <p>20 <b>A. Yes, yes.</b></p> <p>21 Q. In his statement, Mr Tillotson recalls a conversation</p> <p>22 with Watch Manager O'Keeffe in which he said, "We need</p> <p>23 to get hold of this now, we need to get in there and</p> <p>24 start rescuing people."</p> <p>25 Does that accord with your memory?</p> <p style="text-align: center;">Page 9</p>	<p>1 <b>happened, so you would have a spare set with you.</b></p> <p>2 Q. Did you receive any specific instructions in relation to</p> <p>3 specific flats in relation to any FSG calls?</p> <p>4 <b>A. No.</b></p> <p>5 Q. Were you given any details regarding conditions in the</p> <p>6 stairwell?</p> <p>7 <b>A. No.</b></p> <p>8 Q. Were you given a plan or a layout of the --</p> <p>9 <b>A. No.</b></p> <p>10 Q. Put bluntly, is it fair to say it was just a question of</p> <p>11 you cracking on?</p> <p>12 <b>A. Yeah, to be honest, yes.</b></p> <p>13 Q. It's always difficult, particularly in the context of</p> <p>14 a hearing room, to fully convey the atmosphere within</p> <p>15 the tower.</p> <p>16 Are you able to describe for us your memory of the</p> <p>17 conditions at the bridgehead, state of organisation,</p> <p>18 whether it was calm or not?</p> <p>19 <b>A. It seemed relatively calm, to be honest, at the time.</b></p> <p>20 <b>Watch Manager O'Keeffe was there and another firefighter</b></p> <p>21 <b>who I don't know running the board. It was just very</b></p> <p>22 <b>tight and cramped so, yeah, it -- just things moved</b></p> <p>23 <b>very, very quickly from when we got there and Crew</b></p> <p>24 <b>Manager Tillotson put forward what he was suggesting,</b></p> <p>25 <b>everything just moved quite quickly. But it was</b></p> <p style="text-align: center;">Page 11</p>
<p>1 <b>A. Sorry, who said that?</b></p> <p>2 Q. Mr Tillotson talking to Mr O'Keeffe at the bridgehead?</p> <p>3 <b>A. It would've been something along those lines, yes, yes.</b></p> <p>4 Q. Mr Wolfenden, or James Wolfenden, I should say --</p> <p>5 I think you call him Wolfy?</p> <p>6 <b>A. Yes.</b></p> <p>7 Q. Suggests that it was Crew Manager Tillotson who decided</p> <p>8 to undertake the search and rescue, to which Mr O'Keeffe</p> <p>9 said, "Fine, you crack on."</p> <p>10 Does that accord with your memory?</p> <p>11 <b>A. Yes, that's correct.</b></p> <p>12 Q. Given what you'd seen outside, did you think it was</p> <p>13 necessary to take any secondary sets of BA equipment</p> <p>14 with you?</p> <p>15 <b>A. No, we wouldn't take second sets unless we were going to</b></p> <p>16 <b>find other firefighters or if there was a firefighter</b></p> <p>17 <b>emergency or -- yeah, we had missing firefighters, we</b></p> <p>18 <b>wouldn't make our spare set, no.</b></p> <p>19 Q. I don't know whether you watched last week's evidence,</p> <p>20 but one of the questions was: is it ever automatic that</p> <p>21 you take up secondary BA sets, and from what you're</p> <p>22 saying, the only time it would be automatic is in the</p> <p>23 event of a missing firefighter; is that right?</p> <p>24 <b>A. Yeah, or if we were detailed as an emergency crew, so</b></p> <p>25 <b>that would be a crew standing by in case something</b></p> <p style="text-align: center;">Page 10</p>	<p>1 <b>relatively calm, to be honest.</b></p> <p>2 Q. I'd now like to turn to the time where you went under</p> <p>3 air and into the tower.</p> <p>4 You tallied out at 01.42. Did you see any</p> <p>5 firefighters or residents coming down the stairwell</p> <p>6 before you reached the 6th floor?</p> <p>7 <b>A. No.</b></p> <p>8 Q. As you went up the tower, between the bridgehead and the</p> <p>9 6th floor, were you entering on each lobby, on each</p> <p>10 floor, and banging on each flat door? Can you remember</p> <p>11 what you did?</p> <p>12 <b>A. We went up to where -- I believe it was the 4th, where</b></p> <p>13 <b>the fire floor was, and then we went -- because the</b></p> <p>14 <b>residents at the back looked as though they were higher</b></p> <p>15 <b>than the 4th floor, so we then went -- tried to go</b></p> <p>16 <b>systematically from there and working our way up,</b></p> <p>17 <b>banging on all the doors, yes.</b></p> <p>18 Q. When you say systematically, you go from the 4th floor</p> <p>19 up, just to be clear --</p> <p>20 <b>A. So we go to the 5th, they weren't very big lobbies at</b></p> <p>21 <b>all, so we'd knock on every single door, you know,</b></p> <p>22 <b>loudly, saying who we were, and if people came out -- if</b></p> <p>23 <b>they were able-bodied or young, we were directing them</b></p> <p>24 <b>down the stairs, or we led a few people down the stairs</b></p> <p>25 <b>at that stage.</b></p> <p style="text-align: center;">Page 12</p>

<p>1 Q. What were smoke conditions like on the 4th and 5th 2 floors during that process?</p> <p>3 <b>A. At the time -- I don't know about the 4th, I don't 4 believe we entered the 4th, it was quite -- it was 5 difficult to tell what floors you was on because there 6 wasn't any signage.</b></p> <p>7 Q. Can you remember -- sorry, I interrupted you.</p> <p>8 <b>A. Yeah, but there wasn't smoke-logging at this stage, no.</b></p> <p>9 Q. Can you remember, at this stage in the evening, was the 10 lighting working in the stairwell?</p> <p>11 <b>A. Yeah, I believe it was, yes.</b></p> <p>12 Q. Do you remember what, if any, hoses and equipment were 13 lying in the stairwell as you went up to the 6th floor?</p> <p>14 <b>A. No.</b></p> <p>15 Q. You reached the 6th floor and banged on the doors 16 getting people out.</p> <p>17 Again, the process you followed, was it the same 18 that you followed on the 5th floor, systematically going 19 around each of the flats on the 6th floor?</p> <p>20 <b>A. Yeah. I mean, occasionally we got stopped because 21 people were already out of their flats and we'd direct 22 them down, but yeah, that was pretty much it.</b></p> <p>23 Q. When you were banging on the flat entrance doors, can 24 you remember what you were saying?</p> <p>25 <b>A. "London Fire Brigade, you need to get out."</b></p> <p style="text-align: center;">Page 13</p>	<p>1 their own?</p> <p>2 <b>A. It was a mixture. Some would just go obviously because 3 they can move a lot quicker and they'd go straight down, 4 and others, no, others -- because there were some 5 elderly people and people who weren't necessarily 6 able-bodied, you'd have to help them down, yeah.</b></p> <p>7 Q. Do you remember what condition the residents were in, 8 those who were evacuating at that stage?</p> <p>9 <b>A. I think just very confused and, because of the timings, 10 very tired and, yeah, were a bit bewildered with what 11 was happening.</b></p> <p>12 Q. Can you remember whether any of the residents who were 13 evacuating were wearing secondary BA sets or whether 14 they had masks on their face linked to any --</p> <p>15 <b>A. No.</b></p> <p>16 Q. You don't remember or --</p> <p>17 <b>A. No, none of them were, no.</b></p> <p>18 Q. Okay.</p> <p>19 Can I now turn to conditions as you went further up 20 the tower from the 6th to the 9th floor.</p> <p>21 First of all, could you describe for us the smoke 22 conditions and the visibility you encountered between 23 the 6th and the 9th floors?</p> <p>24 <b>A. It was all pretty clear, to be honest, until we got to 25 the 9th floor, where we found the two -- the lady and</b></p> <p style="text-align: center;">Page 15</p>
<p>1 Q. Can you remember precisely how many people evacuated 2 from flats on the 6th floor?</p> <p>3 <b>A. No.</b></p> <p>4 Q. Do you remember Mr Tillotson saying words to the effect, 5 "You have to get out now, if you don't, you won't get 6 out"?</p> <p>7 <b>A. No, I don't. We were in a crew of five so we were 8 spread out a little bit and doing different doors at 9 different times, so ...</b></p> <p>10 Q. Do you agree that that was advice that was sensible at 11 the time?</p> <p>12 <b>A. To be honest, I hadn't seen -- when we arrived, it 13 looked like it was two flats alight from the outside, so 14 I had absolutely no understanding of what the conditions 15 were like, to be honest, in the whole block until we 16 exited.</b></p> <p>17 Q. You say at page 7 of your witness statement -- we don't 18 need to go to it unless you want to -- that there was 19 "a nice green handrail".</p> <p>20 Did this help you to lead people down the tower?</p> <p>21 <b>A. Yes, definitely, you could just tell them to follow the 22 handrail, the green handrail.</b></p> <p>23 Q. You mention in your witness statement on page 7 that 24 firefighters started to come down.</p> <p>25 Were they with residents or were the firefighters on</p> <p style="text-align: center;">Page 14</p>	<p>1 <b>her daughter, and then I remember standing in the lobby 2 door to the stairwell, and I looked -- I was sort of 3 flitting in and out, and I looked out and it seemed to 4 get some white smoke, quite hazy, and I remember saying, 5 "There's smoke coming up the stairs". And then I looked 6 again and then it was pretty much pitch black coming up 7 the stairs.</b></p> <p>8 Q. So the white had turned to black?</p> <p>9 <b>A. Yes.</b></p> <p>10 Q. Quite quickly, from the sounds of it.</p> <p>11 <b>A. Yeah, it was literally a case of came in, I said what 12 I said, I went and looked again and the conditions were 13 like that straight away.</b></p> <p>14 Q. Had it become denser? You mentioned the white smoke was 15 hazy; was the black smoke denser?</p> <p>16 <b>A. In terms of visibility, yes.</b></p> <p>17 Q. In your statement -- I'll give the reference, page 7, 18 three lines up from the end of the main paragraph on 19 that page -- you refer to the stair procedure.</p> <p>20 Can you describe for us what the stair procedure is?</p> <p>21 <b>A. Stair procedure is a procedure you'd use if you were -- 22 to make sure that the stairs were safe and they weren't 23 going to collapse, and you'd basically come down on your 24 front and you'd sweep with your feet -- facing upwards, 25 sorry, and you'd sweep with your feet and you'd be</b></p> <p style="text-align: center;">Page 16</p>

<p>1 <b>banging with your hands just to ensure that what you</b></p> <p>2 <b>were walking on was solid, and moving debris if there</b></p> <p>3 <b>was any debris on the stairs.</b></p> <p>4 Q. I'd now like to talk to you about the 9th floor and the</p> <p>5 rescue you made there of the mother and child.</p> <p>6 First of all, you've helped us with conditions on</p> <p>7 the stairwell. You reached the 9th floor, and did you</p> <p>8 go into the lobby of the 9th floor?</p> <p>9 <b>A. Yes.</b></p> <p>10 Q. Can you describe the smoke conditions as you found them</p> <p>11 then?</p> <p>12 <b>A. Well, that was when the conditions got worse in the</b></p> <p>13 <b>stairs, the lobby -- I think the lights of the lobby</b></p> <p>14 <b>weren't working, and to my recollection there didn't</b></p> <p>15 <b>seem to be any smoke damage or any smoke in the lobby at</b></p> <p>16 <b>that time.</b></p> <p>17 Q. Who alerted you to the presence of the mother and child,</p> <p>18 can you remember now?</p> <p>19 <b>A. No. It was from my crew, but I don't know in</b></p> <p>20 <b>particular.</b></p> <p>21 Q. But you hadn't opened the relevant flat door?</p> <p>22 <b>A. No.</b></p> <p>23 Q. Could I ask you to turn to page 8 of your witness</p> <p>24 statement, and it's the second main paragraph on that</p> <p>25 page, where you say this:</p> <p style="text-align: center;">Page 17</p>	<p>1 by working to policy and running a hose up one from the</p> <p>2 floor below, keeping the door open on that floor,</p> <p>3 running the hose up the stairs onto the fire floor which</p> <p>4 meant keeping that door open also. So if that fire was</p> <p>5 then to breach that room/flat on the fire floor and come</p> <p>6 out into the hall that smoke would travel through down</p> <p>7 the hall and out that door and back up the stairwell and</p> <p>8 now you have compromised your stairwell. Which someone</p> <p>9 might say happened in Grenfell there seem to be a bit of</p> <p>10 smoke on the stairwell."</p> <p>11 Again, would you agree that's a summary of your</p> <p>12 view?</p> <p>13 <b>A. That was exactly what I was getting at, yes, exactly.</b></p> <p>14 Q. Okay.</p> <p>15 The next topic I'd like to discuss with you is the</p> <p>16 evacuation of the mother and child from the 9th floor.</p> <p>17 Now, on the basis of your statement, Mr Tillotson</p> <p>18 ordered Mr Bettinson and James Wolfenden to stay in the</p> <p>19 flat with the mother and child; is that right?</p> <p>20 <b>A. Yes.</b></p> <p>21 Q. And that they were in flat 65; is that right?</p> <p>22 <b>A. I don't know the number.</b></p> <p>23 Q. He and you would then go down to the lobby to get spare</p> <p>24 sets of BA; is that right?</p> <p>25 <b>A. No, I initially went down with a guy from Hammersmith,</b></p> <p style="text-align: center;">Page 19</p>
<p>1 "I went with another fire fighter who I can't</p> <p>2 remember to find out where the dry riser was because 99</p> <p>3 out 100 time they are in they are [sic] on every single</p> <p>4 floor and we had a look in the hall way which was pitch</p> <p>5 black just from the darkness not through smoke. We</p> <p>6 found it in a back corner and I immediately knew this</p> <p>7 would be a problem because every door on the floor we</p> <p>8 have plugged the hoses into will be open."</p> <p>9 First, are you saying that as the doors were open to</p> <p>10 allow firefighters to use hoses on each floor, this</p> <p>11 meant that the smoke would inevitably spread through the</p> <p>12 building?</p> <p>13 <b>A. Yes, because you'd have to open the lobby doors to have</b></p> <p>14 <b>that -- because we go from a floor below, the hose would</b></p> <p>15 <b>therefore come out of that floor and it would have to go</b></p> <p>16 <b>up the stairway into the next floor, and the only way to</b></p> <p>17 <b>get it through those doors is for them to be open, yes.</b></p> <p>18 Q. If I can ask you, just for the sake of completeness, to</p> <p>19 turn to page 28 of your witness statement, it's the</p> <p>20 first main paragraph on that page. You said this:</p> <p>21 "In Grenfell even though I said it wasn't a</p> <p>22 complicated layout, in the pitch black we still had to</p> <p>23 look on the floors to find the outlet. It seemed a</p> <p>24 funny place to be right next to someone's door at the</p> <p>25 other side of the building from stairwell. Which meant</p> <p style="text-align: center;">Page 18</p>	<p>1 <b>who to this day I still don't know his name. That's</b></p> <p>2 <b>terrible, but ...</b></p> <p>3 Q. Would smoke hoods have been useful in this instance to</p> <p>4 have obtained?</p> <p>5 <b>A. Yeah, they would've helped us out a lot in that</b></p> <p>6 <b>instance, yes.</b></p> <p>7 Q. Do you carry any with you?</p> <p>8 <b>A. No.</b></p> <p>9 Q. Does any LFB appliance carry smoke hoods?</p> <p>10 <b>A. No.</b></p> <p>11 Q. It follows from that, presumably, that you've never had</p> <p>12 to use smoke hoods --</p> <p>13 <b>A. No.</b></p> <p>14 Q. -- to evacuate.</p> <p>15 Consequent flow from that, you've never had to use</p> <p>16 them in training or any other simulation?</p> <p>17 <b>A. No.</b></p> <p>18 Q. Presumably you then returned to the bridgehead, and did</p> <p>19 you update the bridgehead as to what you found and what</p> <p>20 the plan was?</p> <p>21 <b>A. No. The timings of when we found the mother and the</b></p> <p>22 <b>child were realistically at a point where we should've</b></p> <p>23 <b>been turning round and coming back out, so it kind of</b></p> <p>24 <b>changed everything. And, no, to be honest, we came</b></p> <p>25 <b>through -- I came through the lobby -- not the lobby,</b></p> <p style="text-align: center;">Page 20</p>

<p>1        <b>sorry, where the bridgehead was out on to where the</b>  2        <b>mezzanine was, and just immediately said, "I need two BA</b>  3        <b>sets now", which in hindsight for them to hear that</b>  4        <b>would probably be a little bit strange.</b>  5        Q. You were speaking to Mr Dowden?  6        A. <b>No. To be honest, I don't know actually who that was.</b>  7        <b>I can't remember. I thought it was at the time, but no,</b>  8        <b>I'm not sure, actually, who that was. It was a watch</b>  9        <b>manager who I was speaking to but I don't know if it was</b>  10       <b>Mr Dowden.</b>  11       Q. If he spoke back to you, did he have an Irish accent?  12       Do you remember if it was Mr O'Keeffe, for example?  13       A. <b>No, it wasn't him.</b>  14       Q. So you said you wanted a second set of BA. What did the  15       watch manager say to you?  16       A. <b>I said we wanted two BA sets, not second -- yeah -- set.</b>  17       <b>Two BA sets. And then the watch manager said what he</b>  18       <b>rightly should say, "Where are they? Tell us where they</b>  19       <b>are and we'll send two more BA wearers." But because</b>  20       <b>we'd been up and down so many times and we felt we knew</b>  21       <b>the layout -- and the worry for me was that because</b>  22       <b>there was no signage anywhere, we wouldn't find them,</b>  23       <b>and I was just very aware that we'd left two people, two</b>  24       <b>people from, you know, my watch in the flat with the</b>  25       <b>casualties.</b></p> <p style="text-align: center;">Page 21</p>	<p>1       Q. Can you describe for us the conditions on the stairwell  2       as you went back up to the 9th floor?  3       A. <b>It was heavily smoke-logged. The light on the stairwell</b>  4       <b>was helping us, but it was heavily smoke-logged.</b>  5       Q. You returned to flat 65. You were able to evacuate the  6       mother and child.  7       Is it right that the mother had a BA set and the  8       child was given a spare mask attached to Mr Bettinson's  9       BA set?  10       A. <b>Yeah, we came into the flat and, to be honest, I hadn't</b>  11       <b>actually seen who -- the lady and her daughter, so I was</b>  12       <b>a bit taken aback because the daughter was so young and</b>  13       <b>my first thought was: I don't know how we're going to</b>  14       <b>put a set on this girl. And we just sort of -- we just</b>  15       <b>had a second, and I just remember saying to Harry that</b>  16       <b>he was going to have to carry her and we'll stick the</b>  17       <b>mask -- because he had quite a lot of air left, we</b>  18       <b>plugged the mask straight into his set and the lady</b>  19       <b>could put the set on, and it was -- I mean, definitely</b>  20       <b>in hindsight, they were very, very calm. It was --</b>  21       <b>I mean, they might be very calm themselves, but</b>  22       <b>I probably put a lot of that down to Firefighters</b>  23       <b>Wolfenden and Bettinson, what they were saying to them</b>  24       <b>whilst they were waiting.</b>  25       Q. Do you have any training for learning how to put on</p> <p style="text-align: center;">Page 23</p>
<p>1       <b>So it seemed a much better idea if we just got them</b>  2       <b>and got on with what we needed to do as quickly as</b>  3       <b>possible. They were very hesitant and they kept saying,</b>  4       <b>"Just tell us where they are, just tell us where they</b>  5       <b>are", and then I believe Crew Manager Tillotson came</b>  6       <b>down. I was speaking to a couple of firefighters</b>  7       <b>saying, "Give me your sets", and I think Crew Manager</b>  8       <b>Tillotson spoke to the watch manager, and then they gave</b>  9       <b>us our sets, which I know was probably very difficult</b>  10       <b>for them to do. But, yeah, they gave us their sets.</b>  11       Q. So did Mr Tillotson say, when it was suggested that  12       a fresh crew be sent up, words to the effect of, "That  13       is not going to happen"? Does that sound --  14       A. <b>With a fresh crew? I don't know.</b>  15       Q. Would you recognise Watch Manager Watson? Do you know  16       of him, first of all, I suppose is the first question?  17       A. <b>No, I had only been on the Red Watch for a year and</b>  18       <b>a half, I was on the Blues before that, and it's like</b>  19       <b>almost starting a new job, you know, you don't know</b>  20       <b>everybody on that watch at all.</b>  21       Q. The upshot is that you obtained two BA sets; is that  22       right?  23       A. <b>That's correct.</b>  24       Q. You went back up to floor 9 and flat 65 in particular?  25       A. <b>Yes.</b></p> <p style="text-align: center;">Page 22</p>	<p>1       secondary BA sets on people who may be smaller than  2       firefighters or even children? Is it possible to train  3       for that?  4       A. <b>No, we just practise with other firefighters. To be</b>  5       <b>honest, that's who they're for.</b>  6       Q. Have you had a previous experience where you've had to  7       put a mask on a child's face in order to --  8       A. <b>No, absolutely not.</b>  9       Q. The next topic I'd like to turn to is return to the  10       bridgehead.  11       You tallied out at 02.17. Did you debrief anyone at  12       the bridgehead what happened in relation to flat 65?  13       A. <b>No, I didn't have -- no. No.</b>  14       Q. Did you hear a quick debrief between Crew Manager  15       Tillotson and a station manager at the bridgehead?  16       A. <b>Yeah, I think they did have a debrief, but I have --</b>  17       Q. Did you overhear --  18       A. <b>-- absolutely no idea what was said.</b>  19       Q. Do you remember any other discussion at the bridgehead  20       regarding the use of BA sets to assist the evacuation of  21       residents?  22       A. <b>No.</b>  23       Q. Did you raise it with anyone at the bridgehead?  24       A. <b>No. To be honest, everything was moving so quickly. As</b>  25       <b>soon as we came through, we had to get our breath, and</b></p> <p style="text-align: center;">Page 24</p>

6 (Pages 21 to 24)

<p>1 <b>I think it was a bit of a shock from all of us what was</b>  2 <b>happening, because we'd seen that the fire had obviously</b>  3 <b>reached up by the 9th floor because the flames were</b>  4 <b>coming past the window when we were in there, but</b>  5 <b>I think everyone was a bit shell shocked because we</b>  6 <b>weren't expecting that. And then whilst we were</b>  7 <b>there -- it was Paddington's FRU crew came through the</b>  8 <b>door with another casualty and then the priorities went</b>  9 <b>to that.</b>  10 Q. Thank you.  11 If I can now turn to your second task you were  12 allocated on the night, and you describe at page 14 of  13 your witness statement witnessing an incident involving  14 Station Manager Gareth Cook. I can take you to it but  15 it may be easier if we press ahead. You say:  16 "Gareth [Cook] is a doer he had volunteered to go up  17 to carry out a situation report which to us having been  18 up was nonsense the situation was every single floor was  19 alight. But obviously for those senior officers at the  20 bridge head which I think it was at Group Manager Level  21 in fairness to them they needed a bit more information  22 than we were providing them."  23 To be clear, just taking each element of that, was  24 it you or Group Manager Cook who said the brief was  25 nonsense?</p> <p style="text-align: right;">Page 25</p>	<p>1 than we were providing them."  2 When you were giving the statement, can you remember  3 what you had in mind, what information they were missing  4 which they needed?  5 <b>A. I think I was just trying to be fair, to be honest.</b>  6 <b>I think obviously the information they were getting</b>  7 <b>was -- it was very different to be at the bridgehead</b>  8 <b>than to watch it outside. It was almost like two</b>  9 <b>different jobs -- and a lot of high-rise incidents are</b>  10 <b>quite similar to that. The bridgehead is supposed to be</b>  11 <b>in a safe place, in safe air, and you don't always get</b>  12 <b>a full picture, and I would imagine that what was coming</b>  13 <b>down was a description of what was going on outside, and</b>  14 <b>they probably just wanted to get clarification. But</b>  15 <b>unfortunately what was coming down was the truth.</b>  16 Q. Did you ever hear any information coming from outside  17 the tower to brief the officers in charge of the  18 bridgehead as to how the fire was spreading on the  19 exterior? Do you remember hearing --  20 <b>A. No, usually once you'd -- no, there was still stuff</b>  21 <b>going on. You were just getting on with your tasks.</b>  22 <b>I wasn't paying any attention to that.</b>  23 Q. Staying at page 14, looking at the penultimate paragraph  24 on that page, you describe the briefing for the second  25 task you were deployed to take. You say that yourself</p> <p style="text-align: right;">Page 27</p>
<p>1 <b>A. What, the brief we were given?</b>  2 Q. Yes.  3 <b>A. No, no one said it out loud, I was just, you know, in</b>  4 <b>hindsight thinking that it was -- I mean, you saw what</b>  5 <b>happened, and it was just -- I don't know how to explain</b>  6 <b>it. Nothing was said at the time, it was the correct</b>  7 <b>brief that we were given, but it almost seemed</b>  8 <b>fruitless, if you know what I mean. Yeah. It wasn't</b>  9 <b>said that anything was nonsense at the time, that was</b>  10 <b>just me in hindsight.</b>  11 Q. Reflecting after the event?  12 <b>A. Yeah, that's right.</b>  13 Q. Again, this may be a reflection after the event, but  14 what information do you think the senior officers at the  15 bridgehead needed that they didn't have? What would've  16 assisted them, do you think?  17 <b>A. I've absolutely no idea.</b>  18 Q. So when you say, looking at the final bit of that  19 paragraph -- it may be easier if I ask you to turn to  20 it, page 14 of the witness statement and the first  21 substantive paragraph on that page, and it's really the  22 last sentence, you say:  23 "But obviously for those senior officers at the  24 bridge head which I think it was at Group Manager Level  25 in fairness to them they needed a bit more information</p> <p style="text-align: right;">Page 26</p>	<p>1 and Gareth Cook were given a brief:  2 "... which was something like just let me know what  3 you have got up there tell me what's going on. Because  4 by this time there was no communication anywhere,  5 nothing and the airwave was flooded due to the number of  6 fire fighter. There was one channel really for BA  7 users."  8 I suppose my first question is: what further  9 information did Group Manager Goulbourne need at that  10 stage?  11 <b>A. I don't know.</b>  12 Q. Are you able to be more precise as to the particular  13 task you were required to do?  14 <b>A. This time? Exactly what was put there: just go up and</b>  15 <b>try and find out what was going on.</b>  16 Q. To the best of your memory, are those the words Group  17 Manager Goulbourne said to you?  18 <b>A. Yes.</b>  19 Q. You weren't directed to a particular floor or flat on  20 the floor?  21 <b>A. No.</b>  22 Q. At that stage, were you given any briefing regarding  23 conditions in the stairwell?  24 <b>A. No. No, I think because I'd already been up, I think</b>  25 <b>that was --</b></p> <p style="text-align: right;">Page 28</p>

<p>1 Q. Sufficient insight?</p> <p>2 <b>A. I would say. But, no, I wasn't given anything extra,</b></p> <p>3 <b>no.</b></p> <p>4 Q. In your witness statement, you describe going up to the</p> <p>5 12th floor. It may help if I ask you to turn to the top</p> <p>6 paragraph on page 15. You say this from the second line</p> <p>7 onwards:</p> <p>8 "We made it to I think the 12th floor and there was</p> <p>9 no one else on that floor. In the lobby it was warm,</p> <p>10 there was a smoke layer which was a little bit low and</p> <p>11 pitch black. There was clearly no fire in the hallway.</p> <p>12 We banged on all the doors but there was no answer,</p> <p>13 nothing. We stepped back out to the stairwell and</p> <p>14 I said the situation is we just need to clear every</p> <p>15 floor and the only way we can really do that is to put</p> <p>16 the doors in and make sure there is no one there. We</p> <p>17 had to check especially at that time of night, it was</p> <p>18 the middle of the night people may still be asleep and</p> <p>19 not even have woken. People do place ear phones in and</p> <p>20 could be enjoying their sleep unaware of what was going</p> <p>21 on around them."</p> <p>22 In relation to the search you recommended be carried</p> <p>23 out there, what training have you received to search in</p> <p>24 this way that you recommended?</p> <p>25 <b>A. All our BA training is usually down to search and rescue</b></p> <p style="text-align: center;">Page 29</p>	<p>1 <b>A. Yes.</b></p> <p>2 Q. How were you recording -- what record was being made of</p> <p>3 the flats and the floors that you were clearing which</p> <p>4 could then be relayed back to the bridgehead when you</p> <p>5 got back down there or when you had comms?</p> <p>6 <b>A. If we'd cleared a floor, gone round every single door</b></p> <p>7 <b>and done it, then we'd have relayed that back just by</b></p> <p>8 <b>coming back to the bridgehead. But if -- because there</b></p> <p>9 <b>was no signage or anything, it was very difficult to</b></p> <p>10 <b>relay any real information to say that a certain floor</b></p> <p>11 <b>is cleared. We had no way of recording it, really.</b></p> <p>12 Q. Flowing on from that, if I could ask you to look at the</p> <p>13 final paragraph on page 15 of your witness statement,</p> <p>14 we're dealing here with the debrief on your return from</p> <p>15 the 12th floor and you say that:</p> <p>16 "Gareth reported there is pretty much fire on every</p> <p>17 floor, we haven't got water up there properly, we just</p> <p>18 need to keep searching to see how many people we can get</p> <p>19 out and we couldn't get past the 12th at this stage."</p> <p>20 Can you remember now, did Station Manager Cook</p> <p>21 mention anything to the bridgehead officers about having</p> <p>22 sufficient equipment to put doors in?</p> <p>23 <b>A. No. No. I don't know.</b></p> <p>24 Q. You can't remember?</p> <p>25 <b>A. No, to be honest, I stayed for a bit at the briefing,</b></p> <p style="text-align: center;">Page 31</p>
<p>1 <b>and searching a room, or searching a compartment.</b></p> <p>2 Q. The process of breaking in doors to check whether anyone</p> <p>3 was in there, that's the process you're trained to carry</p> <p>4 out; is that right?</p> <p>5 <b>A. Normally we wouldn't put a door in unless we had water,</b></p> <p>6 <b>especially in a high-rise.</b></p> <p>7 Q. On this occasion, why did you think it was a necessary</p> <p>8 step to take?</p> <p>9 <b>A. Because it wasn't -- because I'd already been outside</b></p> <p>10 <b>and I'd seen the state of the building, you knew that it</b></p> <p>11 <b>was 100 per cent alight. There was no way you could get</b></p> <p>12 <b>water onto every single floor because you can't pump</b></p> <p>13 <b>that much water up to then supply a hose off every</b></p> <p>14 <b>single floor. You just wouldn't get that water up</b></p> <p>15 <b>there. So it sort of got to a point where it was just</b></p> <p>16 <b>a case of get every single person out as quickly as</b></p> <p>17 <b>possible and so we had to -- we didn't have a choice.</b></p> <p>18 <b>It was just leave the door and hope that no one's in</b></p> <p>19 <b>there or put the door in and make sure no one's in</b></p> <p>20 <b>there.</b></p> <p>21 Q. As you went round each flat, how did you mark -- on the</p> <p>22 door, the walls, whatever -- that each flat had been</p> <p>23 searched and was clear?</p> <p>24 <b>A. We didn't. We didn't have anything.</b></p> <p>25 Q. You say you didn't have radio comms at this stage.</p> <p style="text-align: center;">Page 30</p>	<p>1 <b>and then I had to take a seat, to be honest.</b></p> <p>2 Q. You didn't add anything to --</p> <p>3 <b>A. No, and it was sort of -- you know, you had a station</b></p> <p>4 <b>manager speaking to a group manager, and he was the</b></p> <p>5 <b>person that was sent to get that information, so I let</b></p> <p>6 <b>them get on with it.</b></p> <p>7 Q. One point that's arisen is: can you carry out a search</p> <p>8 and rescue effectively without having water at this</p> <p>9 stage in the evening?</p> <p>10 <b>A. Yeah, absolutely.</b></p> <p>11 Q. Did you or Mr Cook say anything about the need for</p> <p>12 firefighting media to deal with the situations you found</p> <p>13 on the 12th floor; can you remember?</p> <p>14 <b>A. I remember saying to Group Manager Goulbourne just about</b></p> <p>15 <b>having to make sure -- we need to get hose onto every</b></p> <p>16 <b>single floor, but to be honest, I think that was a bit</b></p> <p>17 <b>of a pipedream.</b></p> <p>18 Q. Turning to near final topics now, Mr Gallagher, the</p> <p>19 third time you went under air.</p> <p>20 If I could ask you to look at the bottom of page 17</p> <p>21 of your statement and the top of page 18, where you</p> <p>22 describe the instructions for your third task. Your</p> <p>23 statement says this:</p> <p>24 "When it was our turn to go up there was four of us.</p> <p>25 Pat Goldbourne[sic] gave me the brief and I think it was</p> <p style="text-align: center;">Page 32</p>



<p>1 probably the most useless but the most honest correct  2 brief I have ever had. He said I don't know what the  3 fuck is going on, I need you to go up there and tell me  4 what is going on and he said we have fire survival calls  5 coming from the 14th floor and above we haven't heard  6 from them for ages and no one can get past the 12th. He  7 said quite simply, I need you to go up there and see if  8 you can push higher. It was totally 100% the correct  9 briefing. I remember saying look what we will go to the  10 12th if we can go any higher we will go higher  11 systematically too to the 13th then the 14th. It was  12 irrelevant telling him that because we didn't get past  13 the 12th floor."</p> <p>14 At that stage, were you aware of the flat numbers of  15 any FSG calls that related to 14th floor or above?</p> <p>16 <b>A. No.</b></p> <p>17 Q. Do you know whether Group Manager Goulbourne was  18 receiving any information back from crews who had been  19 trying to get to the 14th floor and above?</p> <p>20 <b>A. I don't know.</b></p> <p>21 Q. You got to the 12th floor, I think I'm right in saying,  22 and you describe the conditions you encountered on  23 page 19 of your statement. You then came back down to  24 the bridgehead.</p> <p>25 Once you were back at the bridgehead, did you</p> <p style="text-align: right;">Page 33</p>	<p>1 strain it is ridiculous".</p> <p>2 If I ask you the question, "What do you mean by  3 that?", it's the answer you've just given; it's  4 an additional burden to carry?</p> <p>5 <b>A. Yeah, and it's just my personal opinion, we deal with  6 99 per cent of fires with SDBA quite effectively, and  7 EDBA is a lot heavier. It's a lot heavier, and  8 there's -- people can use it, and you use it if you have  9 to, it's not a problem, but there is no need for  10 everybody to have that because you just won't be as  11 effective. It will have a negative effect in most of  12 our incidents, I feel.</b></p> <p>13 Q. Now, you explain in your statement how you used to do  14 a yearly wear for EDBA but no longer, and you say again  15 at page 24, "if you want to be trained wearing EDBA you  16 have to try arrange that yourself."</p> <p>17 Do you know when the change happened, can you  18 remember?</p> <p>19 <b>A. No, not off the top of my head.</b></p> <p>20 Q. Can you remember why?</p> <p>21 <b>A. No. One year we were doing them and the next we  22 weren't.</b></p> <p>23 Q. After the first deployment within the tower, is it fair  24 to say that your view was that the stay-put policy was  25 no longer viable at that stage?</p> <p style="text-align: right;">Page 35</p>
<p>1 explain to Group Manager Goulbourne that you hadn't been  2 able to put out the fires on the 12th floor?</p> <p>3 <b>A. Yeah. Yeah, I said that there was pockets of fire.  4 I mean, it was so late in the day, to be honest, when we  5 went into flats, most of them at that level were  6 completely -- just shells. I mean, they didn't even  7 have external walls. So there were just pockets of fire  8 in there that wasn't really affecting the rest of the  9 building by that stage.</b></p> <p>10 Q. Okay.</p> <p>11 Just dealing with further matters arising from the  12 night.</p> <p>13 As you sat reflecting after the event, did you have  14 any further thoughts about the need to carry secondary  15 BA sets when you're responding to FSG calls to assist  16 residents back down the tower?</p> <p>17 <b>A. No, not secondary BA sets, no. You can't -- I mean,  18 they're heavy enough as it is. To walk up that high  19 carrying a BA set is just a lot of work, it's a lot of  20 hard work, and you'd be not very effective when you got  21 there, especially if you didn't need it.</b></p> <p>22 Q. Flowing on from that question, we can go to it, but at  23 page 24 of your witness statement, in relation to EDBA,  24 you mentioned that the fire service wanted EDBA for  25 everyone, but you say "why put yourself under that</p> <p style="text-align: right;">Page 34</p>	<p>1 <b>A. Oh, yeah, 100 per cent, yeah.</b></p> <p>2 Q. Would you therefore have evacuated the residents and, if  3 so, how would you have gone about it?</p> <p>4 <b>A. What, for the whole block?</b></p> <p>5 Q. How would you have done it? If stay put was no longer  6 viable, what would you have done next, given your  7 experience?</p> <p>8 <b>A. Short of some sort of alarm for the building or some  9 evacuation signal, I don't really see how you could  10 ever -- short of going to every single floor, like we  11 tried to, and every single flat, there is no way you can  12 evacuate a building of that size.</b></p> <p>13 Q. Would you have been able to execute a partial  14 evacuation, do you think, at that stage?</p> <p>15 <b>A. Well, to be honest, that's what we were trying to do  16 when we first went up there, because obviously the fire  17 travels up, so we were trying to get the next floors,  18 and it was only really when we came out and realised the  19 extent of what had happened is that it should've been  20 the whole building, yes.</b></p> <p>21 MR KINNIER: Mr Gallagher, at this stage, I have no further  22 questions.</p> <p>23 Sir, might I ask for a brief break to see if any  24 further points have arisen?</p> <p>25 SIR MARTIN MOORE-BICK: Yes, of course.</p> <p style="text-align: right;">Page 36</p>

<p>1 Well, Mr Gallagher, we do find from time to time</p> <p>2 that additional questions crop up after Mr Kinnier</p> <p>3 thinks he's finished, so we'll have a 5-minute break and</p> <p>4 then ask you to come back and see whether there are more</p> <p>5 questions.</p> <p>6 THE WITNESS: Thank you.</p> <p>7 SIR MARTIN MOORE-BICK: Please don't talk to anyone about</p> <p>8 your evidence while you're out of the room.</p> <p>9 THE WITNESS: Thank you very much.</p> <p>10 SIR MARTIN MOORE-BICK: So if you go with the usher now,</p> <p>11 we'll resume at 10.50.</p> <p>12 (The witness withdrew)</p> <p>13 SIR MARTIN MOORE-BICK: I take it 5 minutes is long enough?</p> <p>14 MR KINNIER: Thank you, sir.</p> <p>15 SIR MARTIN MOORE-BICK: 10.50, then, please.</p> <p>16 (10.45 am)</p> <p>17 (A short break)</p> <p>18 (10.50 am)</p> <p>19 SIR MARTIN MOORE-BICK: Yes, Mr Kinnier. What's the</p> <p>20 position?</p> <p>21 MR KINNIER: Some brief supplementals, with your permission,</p> <p>22 sir.</p> <p>23 SIR MARTIN MOORE-BICK: Yes, very well.</p> <p>24 (The witness returned)</p> <p>25 SIR MARTIN MOORE-BICK: Thank you, Mr Gallagher, I think</p> <p style="text-align: right;">Page 37</p>	<p>1 <b>to get that to every single floor.</b></p> <p>2 Q. When you were at the bridgehead, both before and after</p> <p>3 your three deployments under air, did you hear anyone</p> <p>4 ask for secondary sets to take up to the tower to help</p> <p>5 evacuation of residents?</p> <p>6 <b>A. No.</b></p> <p>7 Q. Your third and final deployment. I'm afraid this is one</p> <p>8 of those lawyerly questions. Doing the best you can,</p> <p>9 can you remember the time roughly or as precisely as you</p> <p>10 can at which you were deployed within the tower?</p> <p>11 <b>A. No.</b></p> <p>12 Q. But it was definitely after the second deployment you</p> <p>13 went up with Mr Cook?</p> <p>14 <b>A. Oh, yeah, 100 per cent, yeah.</b></p> <p>15 Q. Can you remember, was it --</p> <p>16 <b>A. It was starting to get light.</b></p> <p>17 MR KINNIER: Okay.</p> <p>18 Mr Gallagher, those are all the questions I have for</p> <p>19 you. The final thing to say is simply thank you for</p> <p>20 coming along today. It's been very helpful.</p> <p>21 SIR MARTIN MOORE-BICK: Yes, I'd like to add my thanks to</p> <p>22 that.</p> <p>23 You did three deployments up the tower, which is</p> <p>24 perhaps a bit unusual, isn't it?</p> <p>25 MR MENON: Yes.</p> <p style="text-align: right;">Page 39</p>
<p>1 a few additional questions.</p> <p>2 THE WITNESS: Okay.</p> <p>3 MR KINNIER: Sorry, Mr Gallagher, thank you for your</p> <p>4 patience.</p> <p>5 First of all, location of the dry riser.</p> <p>6 Where would you expect risers to be in a building of</p> <p>7 this kind?</p> <p>8 <b>A. To be honest, they can be on -- where it was, they can</b></p> <p>9 <b>be, but it's just not the best place for it to be, and</b></p> <p>10 <b>I think I alluded to it in there, from the outside, it</b></p> <p>11 <b>seemed a very modern building, and even on the two</b></p> <p>12 <b>mezzanine levels when you went in, it all seemed quite</b></p> <p>13 <b>modern, but the further you went up, it seemed like</b></p> <p>14 <b>a very old block and I wouldn't expect the dry risers to</b></p> <p>15 <b>be on floors outside people's flats.</b></p> <p>16 Q. You'd expect them to be where?</p> <p>17 <b>A. I'd expect it to be in the stairwell. There should be</b></p> <p>18 <b>some sort of firefighting lobby so we can keep the</b></p> <p>19 <b>smoke-logging down to a minimum.</b></p> <p>20 Q. In a building such as this, where you had fires on</p> <p>21 multiple floors, are you saying it's impossible or</p> <p>22 practically difficult to get water to every floor upon</p> <p>23 which there's a fire?</p> <p>24 <b>A. At a decent pressure -- I've never done it, but at</b></p> <p>25 <b>a decent pressure, yes, it would be very, very difficult</b></p> <p style="text-align: right;">Page 38</p>	<p>1 SIR MARTIN MOORE-BICK: That's very impressive. Thank you</p> <p>2 very much for coming to tell us about it, and your</p> <p>3 evidence will be very useful. Thank you very much.</p> <p>4 THE WITNESS: Thank you.</p> <p>5 SIR MARTIN MOORE-BICK: If you would like to go with the</p> <p>6 usher, you are free to go now.</p> <p>7 THE WITNESS: Thank you very much.</p> <p>8 (The witness was released)</p> <p>9 SIR MARTIN MOORE-BICK: Yes, Mr Kinnier.</p> <p>10 MR KINNIER: Sir, the next witness is firefighter</p> <p>11 Theresa Orchard. May I have your permission to call</p> <p>12 her.</p> <p>13 SIR MARTIN MOORE-BICK: Yes, thank you very much.</p> <p>14 THERESA ORCHARD (sworn)</p> <p>15 Questions by MR KINNIER</p> <p>16 SIR MARTIN MOORE-BICK: Thank you very much, Ms Orchard.</p> <p>17 Sit down and make yourself comfortable.</p> <p>18 All right?</p> <p>19 THE WITNESS: Mm.</p> <p>20 SIR MARTIN MOORE-BICK: Good.</p> <p>21 Yes, Mr Kinnier.</p> <p>22 MR KINNIER: First of all, would you be able to confirm your</p> <p>23 name for the record.</p> <p>24 <b>A. It's Theresa Orchard.</b></p> <p>25 Q. First of all, many thanks for coming along today. It's</p> <p style="text-align: right;">Page 40</p>

1 very much appreciated. In the blue folder in front of  
 2 you, if you could open it to the first tab, you should  
 3 find your statement dated 16 January.  
 4 **A. Yes.**  
 5 Q. Is that right?  
 6 **A. It says Ben Gallagher on it.**  
 7 **SIR MARTIN MOORE-BICK: Ah, you still have Mr Gallagher's,**  
 8 **have you?**  
 9 MR KINNIER: If you move on --  
 10 SIR MARTIN MOORE-BICK: Try working through the folder, see  
 11 if yours is behind it.  
 12 (Pause)  
 13 MR KINNIER: Don't worry, Ms Orchard --  
 14 **A. I have -- yes.**  
 15 MR KINNIER: Have you got it?  
 16 **A. Yes.**  
 17 **SIR MARTIN MOORE-BICK: It will also come up on the screen**  
 18 **to your right, so you may find that more useful.**  
 19 MR KINNIER: Thank you, Ms Orchard. Me and technology don't  
 20 work. It appears that I can't even work files either,  
 21 so apologies.  
 22 The first statement is the one dated  
 23 16 January 2018. Hopefully, behind the next tab you  
 24 will find a contemporaneous note.  
 25 **A. Yes.**

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1 referring to there?  
 2 **A. So it's on page 6, and it's the third paragraph.**  
 3 Q. The one which starts "I could not see the numbers"?  
 4 **A. No "By the time I had gone".**  
 5 Q. And what is the error?  
 6 **A. So it says, "That is when I stopped at Flat 94." I have**  
 7 **no idea where that's -- that is obviously nothing to do**  
 8 **with --**  
 9 Q. I was going to ask you a question about that, so that's  
 10 helpful, thank you.  
 11 SIR MARTIN MOORE-BICK: Shall I just delete that sentence?  
 12 **A. Yes, thank you.**  
 13 **SIR MARTIN MOORE-BICK: Thank you.**  
 14 MR KINNIER: Ms Orchard, thank you very much.  
 15 The questions I'm going to be asking you today will  
 16 focus on the FSG in relation to flat 113 on the  
 17 14th floor.  
 18 **A. Okay.**  
 19 Q. Now, if I could deal with some basic points first, just  
 20 to give us some context.  
 21 First of all, at the time of the fire, is it right  
 22 you were a firefighter stationed at Soho?  
 23 **A. Correct.**  
 24 Q. And at the time of the fire, you had been with the LFB  
 25 for eight years?

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1 Q. Behind that, hopefully, an exhibit to your witness  
 2 statement, which was a map showing the tower and its  
 3 immediate surrounding area; is that right?  
 4 **A. Yes.**  
 5 Q. Have you read those documents recently?  
 6 **A. Yes.**  
 7 Q. Do you confirm that the contents are true?  
 8 **A. There is one thing in there specifically that I don't**  
 9 **recall.**  
 10 Q. In your statement?  
 11 **A. Yes, in the police statement.**  
 12 Q. Okay. If you could flag for me -- well, in a few  
 13 questions, we'll get some preliminaries sorted first --  
 14 what that issue is, then we can take it from there.  
 15 **A. Okay.**  
 16 Q. Are you content, subject to that caveat, for those  
 17 documents to stand as your evidence to the inquiry?  
 18 **A. Yes.**  
 19 Q. Now, at any stage, if you want a break, please say so.  
 20 If at any stage my question is unclear, again, just say  
 21 so and I'll rephrase.  
 22 **A. Okay.**  
 23 Q. You mentioned in your witness statement there was  
 24 a point that you didn't recall. Would you be able to  
 25 show us in your witness statement the point you're

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1 **A. Correct.**  
 2 Q. And that you drove a pump appliance on the night?  
 3 **A. Yes.**  
 4 Q. And the call sign of that pump appliance is Alpha 242?  
 5 **A. Yes.**  
 6 Q. Although you're based at Soho, for the purpose of the  
 7 FSG call to flat 113, it's right you were partnered with  
 8 Firefighter Herrera?  
 9 **A. That's correct.**  
 10 Q. Just so that we can get some context, in terms of  
 11 timings, the LFB has provided us with records which  
 12 indicate that you were mobilised at 01.30, you were on  
 13 the road at 01.36 and you were at the scene at 01.47.  
 14 Does that sound about right to you?  
 15 **A. Yes.**  
 16 Q. The LFB has also provided us with timings in relation to  
 17 your SDBA wear, and they indicate that you tallied out  
 18 at the bridgehead at 02.47. Is that right, or  
 19 thereabouts?  
 20 **A. I really have no idea.**  
 21 Q. Okay.  
 22 Just to provide us with some context of what it was  
 23 like when you arrived on the night, you arrived at  
 24 01.47, you tallied out at the bridgehead to enter the  
 25 tower under air at 02.27.

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11 (Pages 41 to 44)

<p>1 What were you doing in the time between those two</p> <p>2 events?</p> <p>3 <b>A. So when we arrived, as I was driving, I had to then put</b></p> <p>4 <b>on my fire kit and my BA set, and then I made my way to</b></p> <p>5 <b>the tower, whereupon I saw the queue of BA wearers, so</b></p> <p>6 <b>I just joined that queue.</b></p> <p>7 Q. Now, if I can go to dealing with the first topic, and</p> <p>8 that's your sort of entry into the tower.</p> <p>9 If I could ask you to turn to page 3 of your witness</p> <p>10 statement.</p> <p>11 Ms Orchard, as you've seen with others, it is</p> <p>12 probably easier to look at the screen and Paul will</p> <p>13 magnify the relevant extract of the statement for you.</p> <p>14 Looking at page 3 of your witness statement, the</p> <p>15 fourth paragraph, third line, you describe there in the</p> <p>16 third line being called into the holding area.</p> <p>17 <b>A. Yes.</b></p> <p>18 Q. Can you remember, was that holding area inside or</p> <p>19 outside the tower?</p> <p>20 <b>A. Inside.</b></p> <p>21 Q. Do you recall an officer writing FSG details on the</p> <p>22 lobby walls?</p> <p>23 <b>A. No, I don't recall that.</b></p> <p>24 Q. Okay.</p> <p>25 Did he give you a bit of paper to take up to the</p> <p style="text-align: center;">Page 45</p>	<p>1 as to what they'd found on the 14th floor?</p> <p>2 <b>A. No.</b></p> <p>3 Q. Again, before you were deployed, were you aware of</p> <p>4 residents trying to lower themselves out of the window</p> <p>5 using tied sheets?</p> <p>6 <b>A. No, I wasn't.</b></p> <p>7 Q. The next stage I'd like to ask you about is when you're</p> <p>8 actually at the bridgehead.</p> <p>9 In your witness statement, it's page 4 and the</p> <p>10 seventh paragraph, you say you think that when you were</p> <p>11 deployed, the bridgehead was on the 3rd floor.</p> <p>12 Is that a fair summary of your memory?</p> <p>13 <b>A. I think that might be -- I don't know which is the</b></p> <p>14 <b>correct memory, but I think it was on the 2nd floor, but</b></p> <p>15 <b>I'm not sure. I'm not absolutely sure either way.</b></p> <p>16 Q. That's useful.</p> <p>17 As you went up from the mezzanine to the bridgehead,</p> <p>18 do you recall seeing these wall markings? If I could</p> <p>19 ask Paul to bring up MET00013074.</p> <p>20 Do you remember seeing those at any stage?</p> <p>21 <b>A. No, I don't.</b></p> <p>22 Q. It follows, therefore, if Paul could magnify the writing</p> <p>23 on the bottom right-hand quarter, where it says: "113 8</p> <p>24 people 14 floor", you don't recall seeing that?</p> <p>25 <b>A. I don't recall seeing that, no.</b></p> <p style="text-align: center;">Page 47</p>
<p>1 bridgehead, do you remember?</p> <p>2 <b>A. No.</b></p> <p>3 Q. Could I ask Paul to bring up MET00005774.</p> <p>4 Do you remember seeing this writing, this wall</p> <p>5 chart, when you were at the lobby?</p> <p>6 <b>A. No, I don't.</b></p> <p>7 Q. No.</p> <p>8 So it flows from that, if we look at the middle</p> <p>9 column, and the second entry from the bottom, where it</p> <p>10 says: "BA - 113 14th", you didn't register that entry</p> <p>11 there?</p> <p>12 <b>A. No.</b></p> <p>13 Q. If I could ask Paul to turn us to the right-hand column,</p> <p>14 I think it's the third entry from the bottom, where it</p> <p>15 says: "112 14 8P".</p> <p>16 Again, I assume you didn't register that entry</p> <p>17 either?</p> <p>18 <b>A. No, I didn't, no.</b></p> <p>19 Q. Did anyone seek to draw your attention to the writings</p> <p>20 on the walls?</p> <p>21 <b>A. Not that I recall, no.</b></p> <p>22 Q. Before you were deployed from the bridgehead, did you</p> <p>23 see any other firefighters coming down from floor 14?</p> <p>24 <b>A. Not that I recall, no.</b></p> <p>25 Q. Did you overhear anything or was anything passed to you</p> <p style="text-align: center;">Page 46</p>	<p>1 Q. Again, did anyone draw your attention to that?</p> <p>2 <b>A. No.</b></p> <p>3 Q. If I could ask Paul to put up another photo at this</p> <p>4 stage, which is MET00015625.</p> <p>5 Do you remember seeing this at the 3rd floor?</p> <p>6 <b>A. No, I don't.</b></p> <p>7 Q. Do you remember a female officer writing on the wall at</p> <p>8 any stage?</p> <p>9 <b>A. No, I don't, no.</b></p> <p>10 Q. Thank you.</p> <p>11 Final question of these types.</p> <p>12 Paul, could I ask you to put up MET00018749.</p> <p>13 This is a forward information board, I think I'm</p> <p>14 right in saying. Do you remember seeing this at the</p> <p>15 bridgehead, whether on the 2nd or 3rd floors?</p> <p>16 <b>A. No, I don't.</b></p> <p>17 Q. You wouldn't have registered the information in the top</p> <p>18 section of that list?</p> <p>19 <b>A. No.</b></p> <p>20 Q. Okay, thank you.</p> <p>21 Now, the next topic I'd like to discuss with you is</p> <p>22 the instructions you were given at the bridgehead.</p> <p>23 I think in your statement you describe the situation</p> <p>24 as chaotic, but that the female officer who gave you</p> <p>25 instructions was clear. Is that a fair summary of your</p> <p style="text-align: center;">Page 48</p>

<p>1 evidence?</p> <p>2 <b>A. Absolutely, yes.</b></p> <p>3 Q. If I could ask you to turn to page 4 of your statement,</p> <p>4 and it's really the fifth paragraph on that page, you</p> <p>5 say:</p> <p>6 "I think she said six people in Flat 113 on level</p> <p>7 Fourteen. She said, 'They were alright, they're not</p> <p>8 alright now. We need to get them out.' Pete wrote some</p> <p>9 details on his sleeve."</p> <p>10 Now, I think my first question is: are you sure that</p> <p>11 the female officer referred to six people?</p> <p>12 <b>A. I'm fairly confident that's what she said, yes.</b></p> <p>13 Q. Could I ask you to turn to your contemporaneous note.</p> <p>14 Paul, the reference is MET0005610_0001. If you look</p> <p>15 roughly halfway down that page, it's a paragraph which</p> <p>16 starts:</p> <p>17 "At the bridgehead we were given our brief, my</p> <p>18 partner and I were asked to go to flat 113 on level 14</p> <p>19 and assist a family, who were inside, down to floor</p> <p>20 level."</p> <p>21 You don't mention the number six there.</p> <p>22 <b>A. No.</b></p> <p>23 Q. But are you still fairly certain that the number six was</p> <p>24 used by the officer?</p> <p>25 <b>A. Yes.</b></p> <p style="text-align: right;">Page 49</p>	<p>1 agree, that we're dealing with a 20-minute time period</p> <p>2 that deals with your trip to the 14th floor?</p> <p>3 <b>A. Sounds about right, yes.</b></p> <p>4 Q. Were you aware at this stage -- so just before you</p> <p>5 deployed -- that a group of firefighters, Cornelius,</p> <p>6 Murphy and Merrion, had returned to the bridgehead from</p> <p>7 the 14th floor?</p> <p>8 <b>A. No.</b></p> <p>9 Q. Once the female officer had given you your brief, were</p> <p>10 you given any further update before you were deployed up</p> <p>11 the tower?</p> <p>12 <b>A. Not that I recall, no.</b></p> <p>13 Q. I'd like to talk to you now about the conditions that</p> <p>14 you encountered on the stairwell as you went up.</p> <p>15 Is it fair to say that as you went up from the</p> <p>16 bridgehead to the 14th floor, visibility was difficult?</p> <p>17 <b>A. Yes, definitely.</b></p> <p>18 Q. What colour was the smoke?</p> <p>19 <b>A. It was just dense smoke. I don't recall what colour.</b></p> <p>20 Q. You don't recall it being white, changing to black or</p> <p>21 anything like that as you went up?</p> <p>22 <b>A. No.</b></p> <p>23 Q. Did you leave any equipment on the stairwell at any</p> <p>24 stage on the way up?</p> <p>25 <b>A. Yes, I did.</b></p> <p style="text-align: right;">Page 51</p>
<p>1 Q. Did you see Mr Herrera write the flat details and the</p> <p>2 number of people within the flat on his cuff?</p> <p>3 <b>A. I don't know what he wrote, but I saw him writing on his</b></p> <p>4 <b>cuff, yes.</b></p> <p>5 Q. Did you write the flat number on your cuff?</p> <p>6 <b>A. No, I didn't.</b></p> <p>7 Q. Did you write the number of people within?</p> <p>8 <b>A. No, I didn't.</b></p> <p>9 Q. Do you know Crew Manager McAlonen and Firefighter</p> <p>10 Juggins?</p> <p>11 <b>A. I don't know them, no. Well, I may know them by sight</b></p> <p>12 <b>but I don't know them by name.</b></p> <p>13 Q. Do you remember being behind or in the vicinity of any</p> <p>14 other crew that was tasked to carry out an FSG on the</p> <p>15 14th floor?</p> <p>16 <b>A. Sorry, can you say that again?</b></p> <p>17 Q. Yes, of course.</p> <p>18 When you were waiting to be deployed at the</p> <p>19 bridgehead, do you recall any other crew being deployed</p> <p>20 in relation to an FSG from the 14th floor?</p> <p>21 <b>A. No, I don't.</b></p> <p>22 Q. Turning now to your actual deployment to the 14th floor</p> <p>23 and timings.</p> <p>24 The LFB records indicate you tallied out at 02.27</p> <p>25 and tallied back in at 02.47. So it appears, would you</p> <p style="text-align: right;">Page 50</p>	<p>1 Q. What did you leave?</p> <p>2 <b>A. I left an enforcer.</b></p> <p>3 Q. Why did you leave it?</p> <p>4 <b>A. Because it was extremely heavy and slowing down our</b></p> <p>5 <b>progress.</b></p> <p>6 Q. Am I right in saying that because of the difficulties</p> <p>7 presented by the conditions, and the difficulties</p> <p>8 identifying each floor numbering, that initially you</p> <p>9 went to the wrong floor?</p> <p>10 <b>A. I don't think we went to the wrong floor, I think we</b></p> <p>11 <b>went into lobbies to check the floor numbers. Or Pete</b></p> <p>12 <b>did, actually, to be more specific.</b></p> <p>13 Q. Looking at page 6 of your statement, your earlier</p> <p>14 correction, if we go back to that, it's the second</p> <p>15 substantive paragraph on that page, you say there in</p> <p>16 that paragraph:</p> <p>17 "By the time I had gone backwards and forwards a</p> <p>18 couple of times, I had lost where the door was that I</p> <p>19 had come in. So you've got then try and find your way</p> <p>20 back to it [sic]. That is when I stopped at Flat 94.</p> <p>21 That was quite a scary moment."</p> <p>22 <b>A. Yeah, the flat 94 bit, I don't know --</b></p> <p>23 Q. You just didn't --</p> <p>24 <b>A. I don't recall saying that at all.</b></p> <p>25 Q. Okay.</p> <p style="text-align: right;">Page 52</p>

1 By the time you got to the 14th floor, how were you  
2 feeling?  
3 **A. Exhausted.**  
4 Q. Is it right you had to stop and catch your breath?  
5 **A. Definitely, yes.**  
6 Q. Looking now at conditions on the 14th floor, what was  
7 the difference between the conditions you encountered on  
8 the stairwell and in the lobby on the 14th floor?  
9 **A. I think they were pretty similar, actually.**  
10 Q. When you were in the 14th floor lobby, what was your  
11 visibility like? How far forward could you see into the  
12 lobby in terms of metres?  
13 **A. Couldn't really see any distance. We were having to**  
14 **crouch down and get right to the door to see the numbers**  
15 **on the door, so --**  
16 Q. How close up to the doors did you have to go in order --  
17 **A. Inches.**  
18 Q. Inches?  
19 **A. Yeah.**  
20 Q. Were you able to make out Crew Manager McAlonen and  
21 Juggins when you arrived at the 14th floor lobby?  
22 **A. I couldn't see who they were, but we saw the other team,**  
23 **that team.**  
24 Q. What equipment were you wearing on your head?  
25 **A. My helmet and my flash hood, and my BA mask, obviously.**

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1 Q. Would you agree the equipment muffles the voices of  
2 those who are speaking?  
3 **A. Yes.**  
4 Q. To what extent does it affect what you are able to hear?  
5 **A. Well, it would kind of like disguise their voice, but**  
6 **you can make out the words, but you have to raise your**  
7 **voice.**  
8 Q. Are you able to make out the voices of different  
9 individuals?  
10 **A. I didn't recognise the voices.**  
11 Q. Did any of them tell you that they were searching for  
12 flat 111?  
13 **A. They didn't tell me that, no.**  
14 Q. Did anyone say that they'd been into flat 111?  
15 **A. No.**  
16 Q. Did they give you any details as to which flats had been  
17 searched and who was within any of the flats?  
18 **A. Not to me. So Pete was the team leader, so they may**  
19 **have given him some information that I didn't hear.**  
20 Q. How far away was Pete from you?  
21 **A. He would've been just a couple of steps ahead of me.**  
22 Q. Turning to flat 113 itself, you found the flat, but is  
23 it right that the occupants were reluctant to open the  
24 door?  
25 **A. Yes.**

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1 Q. Could you hear what they were saying?  
2 **A. Yes.**  
3 Q. Was it Pete Herrera who was talking to them?  
4 **A. I could hear what they were saying while we were outside**  
5 **the flat, is that what you men?**  
6 Q. First of all, what were they saying?  
7 **A. So when we arrived at the door, we knocked on the door**  
8 **and said that it was the Fire Brigade, and they wouldn't**  
9 **answer the door, but they were saying -- I think we**  
10 **said, "You need to come with us" and they said, "We're**  
11 **not coming out, we're not coming out."**  
12 Q. Did they say why they didn't want to come out?  
13 **A. I couldn't be clear on that, no.**  
14 Q. Is it right that Mr Herrera eventually got into the  
15 flat?  
16 **A. So they eventually opened the door and Pete went in, and**  
17 **a female voice instantly said, "Shut the door, shut the**  
18 **door." They were obviously very frightened.**  
19 **So I pulled the door up just enough that it wouldn't**  
20 **let smoke in sort of thing.**  
21 Q. So did you stay on the lobby side or the flat side?  
22 **A. The lobby side.**  
23 Q. Is it right that you could hear Mr Herrera talking?  
24 **A. I could hear them talking; I couldn't be clear what they**  
25 **were saying.**

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1 Q. You say in your statement that Mr Herrera was talking to  
2 them for about 3 or 4 minutes. Does that sound about  
3 right?  
4 **A. Yes, it may have been even less than that though.**  
5 Q. Is it fair to say then that you couldn't make out any of  
6 the conversation?  
7 **A. No.**  
8 Q. Could you hear any other voices apart from Mr Herrera's?  
9 You referred to a lady.  
10 **A. I could hear voices, but I couldn't tell whether it was**  
11 **more than one person talking or the same person talking**  
12 **or -- it was just voices.**  
13 Q. Okay.  
14 Did you meet McAlonen and Juggins before or after  
15 Mr Herrera went into flat 113?  
16 **A. Before.**  
17 Q. Do you recall hearing Mr Herrera tell Mr McAlonen, "Ben,  
18 there's loads of people in 113 but they won't come out,  
19 they won't open the door, they won't come out"?  
20 **A. I don't recall that, no.**  
21 Q. Do you recall any conversation between Mr Herrera and  
22 Mr McAlonen?  
23 **A. I only recall a conversation -- I don't know what it**  
24 **was -- when we first met another team on that floor when**  
25 **we first made entry to that lobby.**

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14 (Pages 53 to 56)

1 Q. Did they give any indication as to how many people were  
2 in particular flats?

3 **A. No.**

4 Q. If I can now talk to you about the contact you had with  
5 the occupants of flat 113.

6 Mr Herrera you think was in the flat for 3 to  
7 4 minutes, maybe even less time than that.

8 **A. Yes.**

9 Q. Was he on his own in the flat, in the sense was he the  
10 only firefighter in the flat during that period?

11 **A. As far as I was aware, yes.**

12 Q. Is that usual or unusual, to go in on your own in that  
13 situation?

14 **A. I would say unusual.**

15 Q. Okay.

16 **A. But it was an unusual circumstance, so ...**

17 Q. Did the fact that you could hear him suggest that he  
18 hadn't moved far from the flat entrance door?

19 **A. I couldn't say.**

20 Q. Given that it was unusual, were you tempted to go in  
21 and --

22 **A. I was about to go in, yeah.**

23 Q. And he came out?

24 **A. No, he didn't come out, the --**

25 Q. Sorry, one of the occupants came out?

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1 **A. Yes.**

2 Q. How many occupants came out past you, can you remember?

3 **A. As far as I could see, it was three.**

4 Q. How would you describe the first occupant to have left?

5 **A. I would say the first one was an adult carrying a child.**

6 Q. Male, female?

7 **A. I couldn't say for sure, but by the size and silhouette,**  
8 **I would say it was a male.**

9 Q. The second individual was who?

10 **A. Was I think another adult, but shorter.**

11 Q. Are you able to say whether a male or a female?

12 **A. I couldn't say for sure, no.**

13 Q. And the third person to --

14 **A. Was the child that the first person was carrying.**

15 Q. You didn't see a fourth individual?

16 **A. No, I did not.**

17 Q. As they left, did you or Pete go after them?

18 **A. So we both -- so they ran out of the flat, basically.**  
19 **I tried to stop them so that they would come with us,**  
20 **sort of thing, but they'd gone. So Pete came out and**  
21 **then we made our way out of the lobby, expecting to**  
22 **catch them up, but we didn't see them again.**

23 **SIR MARTIN MOORE-BICK: Can I ask you, obviously the door of**  
24 **the flat opened --**

25 **A. Yes.**

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1 **SIR MARTIN MOORE-BICK: -- as people came out and, indeed,**  
2 **as Mr Herrera presumably went in.**

3 **A. Mm-hm.**

4 **SIR MARTIN MOORE-BICK: Did you have any chance to see what**  
5 **the atmosphere inside the flat was like?**

6 **A. No, because I was trying to -- you know, as people came**  
7 **by me -- it was very fast, and as the people came past**  
8 **me, I was trying to, you know, talk to them. So**  
9 **I didn't see inside the flat.**

10 **SIR MARTIN MOORE-BICK: You couldn't see whether there was**  
11 **smoke or whatever?**

12 **A. No, I didn't.**

13 **SIR MARTIN MOORE-BICK: No.**

14 **MR KINNIER: Did you ask Pete how many people were within**  
15 **the flat?**

16 **A. No, I didn't.**

17 Q. Did he tell you how many people were within the flat?

18 **A. No.**

19 Q. Did you ask whether he'd carried out any sweep or search  
20 of the flat?

21 **A. No, I didn't.**

22 Q. How would you describe Mr Herrera's demeanour? Was he  
23 calm, not calm, what?

24 **A. Well, I don't know him very well, so I really couldn't**  
25 **say.**

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1 Q. But was he in a panic, looking at the extremes, was he  
2 panicking or was he calm?

3 **A. I --**

4 Q. Or somewhere in between?

5 **A. Somewhere in between, I think, yes.**

6 Q. Do you recall Mr Herrera shouting at Mr Juggins that  
7 Mr Juggins had not followed his BA partner down the  
8 stairs. Did you ever hear that exchange?

9 **A. No, I don't recall that.**

10 Q. Did you overhear Mr Juggins saying anything to  
11 Mr Herrera --

12 **A. No.**

13 Q. -- before you left the 14th floor?

14 **A. No, I don't recall.**

15 Q. Did you see or witness any conversation between  
16 Mr Herrera and Mr Juggins on the 14th floor after the  
17 residents had left?

18 **A. I don't recall, no.**

19 Q. You say at page 8 of your statement, the second  
20 substantive paragraph, first line:  
21 "I wasn't concerned about the air that I had.  
22 "The actual task itself was pretty straightforward.  
23 It was nothing we had not been trained to do."  
24 It sounds as if you were in control and not  
25 panicking and could've carried out a sweep of the flat

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15 (Pages 57 to 60)

<p>1 if you'd been able to. Is that a fair observation?</p> <p>2 <b>A. I think that question is answered. That statement is</b></p> <p>3 <b>an answer to the police question, sort of thing, rather</b></p> <p>4 <b>than, you know -- obviously it wasn't a straightforward</b></p> <p>5 <b>task because of the circumstances. I think what I mean</b></p> <p>6 <b>is it's a task that we've been trained to do sort of</b></p> <p>7 <b>thing. That actual task wouldn't have been</b></p> <p>8 <b>straightforward and we wouldn't have been relaxed about</b></p> <p>9 <b>it in any way.</b></p> <p>10 Q. After you've seen the three residents leave -- you say,</p> <p>11 I think, they went quickly.</p> <p>12 <b>A. Yes.</b></p> <p>13 Q. Did you think at that stage: should I go in and check</p> <p>14 and sweep the flat?</p> <p>15 <b>A. I -- no.</b></p> <p>16 Q. Are you familiar with the terms of policy 803 on search</p> <p>17 and rescue?</p> <p>18 <b>A. Yes.</b></p> <p>19 Q. We can take you to it if you want, but paragraph 7.1(c)</p> <p>20 there says that when a casualty is discovered, it's</p> <p>21 stated that the firefighters should perform a secondary</p> <p>22 sweep of the immediate vicinity?</p> <p>23 <b>A. Yes.</b></p> <p>24 Q. Do you think that provision was relevant to the</p> <p>25 situation you found here on flat 113?</p> <p style="text-align: center;">Page 61</p>	<p>1 <b>You describe seeing three people come out of the</b></p> <p>2 <b>flat pretty quickly.</b></p> <p>3 <b>A. Yes.</b></p> <p>4 <b>SIR MARTIN MOORE-BICK: Did you see anyone else come out of</b></p> <p>5 <b>the flat other than, of course, Mr Herrera?</b></p> <p>6 <b>A. I don't think so. No, I don't think so. It's possible</b></p> <p>7 <b>because it was very smoky, but I don't think anybody</b></p> <p>8 <b>else came out.</b></p> <p>9 <b>SIR MARTIN MOORE-BICK: Thank you.</b></p> <p>10 MR KINNIER: If I can deal with your return to the</p> <p>11 bridgehead.</p> <p>12 Did you debrief anyone at the bridgehead on what you</p> <p>13 found on the 14th floor?</p> <p>14 <b>A. So Pete gave the debrief, and whilst he was doing that,</b></p> <p>15 <b>I wasn't really listening to him because I was more</b></p> <p>16 <b>concerned that the floors weren't numbered and I wanted</b></p> <p>17 <b>to tell the waiting BA wearers to be aware of that and</b></p> <p>18 <b>to count the floors so they didn't waste time or have to</b></p> <p>19 <b>open doors unnecessarily to find the floor that they</b></p> <p>20 <b>were going to.</b></p> <p>21 Q. Paul, could I ask you to turn up MET00015824.</p> <p>22 Does it flow from what you've just said that you</p> <p>23 didn't have any contact with entry control?</p> <p>24 <b>A. Yes.</b></p> <p>25 Q. Again, do you recall seeing this?</p> <p style="text-align: center;">Page 63</p>
<p>1 <b>A. No, I think that is regarding a smoke atmosphere, smoky</b></p> <p>2 <b>atmosphere, where you can't actually see around the</b></p> <p>3 <b>casualty, the idea being if there's more than one person</b></p> <p>4 <b>there, they'll usually stick together, and you might</b></p> <p>5 <b>pull out one casualty that you find and another one may</b></p> <p>6 <b>be just an arm's length away that you can't see because</b></p> <p>7 <b>of the smoke.</b></p> <p>8 <b>So in a clear atmosphere obviously you just look</b></p> <p>9 <b>around and see that there's --</b></p> <p>10 Q. Given the smoke conditions you'd encountered in the</p> <p>11 lobby --</p> <p>12 <b>A. Mm-hm.</b></p> <p>13 Q. -- and I think I'm right in saying you said you didn't</p> <p>14 go inside and couldn't see within the flat --</p> <p>15 <b>A. Yes.</b></p> <p>16 Q. -- how could you be sure that smoke conditions weren't</p> <p>17 deteriorating within the flat?</p> <p>18 <b>A. Because of her saying, "Shut the door, shut the door",</b></p> <p>19 <b>so it would make me assume that the air was clear in</b></p> <p>20 <b>there and they didn't want the smoke to go in.</b></p> <p>21 Q. Okay.</p> <p>22 If I can now turn to your return to the bridgehead.</p> <p>23 <b>A. Yes.</b></p> <p>24 <b>SIR MARTIN MOORE-BICK: Before you do, Mr Kinnier, can</b></p> <p>25 <b>I just get this clear.</b></p> <p style="text-align: center;">Page 62</p>	<p>1 <b>A. No, I don't.</b></p> <p>2 Q. If Paul could amplify where it says "113 (3 rescues)".</p> <p>3 Sometimes the amplification works, sometimes, as</p> <p>4 here, it doesn't.</p> <p>5 <b>A. Mm-hm.</b></p> <p>6 Q. But did you not register the information contained on</p> <p>7 that?</p> <p>8 <b>A. No, that area was heavily populated, so it wasn't --</b></p> <p>9 Q. But in your view, when you'd come down, there had been</p> <p>10 three people who had left that flat?</p> <p>11 <b>A. As far as I could see, yes.</b></p> <p>12 Q. After you'd got down, did you discuss what you'd</p> <p>13 encountered on flat 113 with any other of the crew</p> <p>14 members or any other firefighters?</p> <p>15 <b>A. No, I did not.</b></p> <p>16 Q. Okay.</p> <p>17 Did you discuss with Mr Herrera whether he'd carried</p> <p>18 out any sweep of the flat or not?</p> <p>19 <b>A. No, I did not. I didn't -- when we came down -- I'm not</b></p> <p>20 <b>clear on what happened, but because I'm not from Pete's</b></p> <p>21 <b>station, you know, he -- I don't know where he went, but</b></p> <p>22 <b>I went off on my own, so to speak.</b></p> <p>23 Q. So after you quit the bridgehead, is it right you had no</p> <p>24 further contact with Mr Herrera on the night?</p> <p>25 <b>A. That's correct.</b></p> <p style="text-align: center;">Page 64</p>



<p>1 Q. One point just to test that, did you join up with</p> <p>2 Mr McAlonen, Juggins, Herrera, Evans and Bloxham outside</p> <p>3 the leisure centre? Were you part of that gathering?</p> <p>4 <b>A. So much later on --</b></p> <p>5 Q. Yes.</p> <p>6 <b>A. -- I was definitely stood with Firefighter Bloxham and</b></p> <p>7 <b>was just -- and a couple of my fellow crew members from</b></p> <p>8 <b>Soho, but I don't recall who was there from Lambeth.</b></p> <p>9 Q. Did you have a conversation with Mr Herrera?</p> <p>10 <b>A. Possibly, but definitely not about what we'd done.</b></p> <p>11 Q. So he didn't say at any stage in your hearing that a man</p> <p>12 who had been in the flat had said to him there were</p> <p>13 people left behind?</p> <p>14 <b>A. No.</b></p> <p>15 Q. When you were talking with Firefighter Bloxham, did she</p> <p>16 say anything along those lines?</p> <p>17 <b>A. No.</b></p> <p>18 Q. On the night, do you recall any conversation with</p> <p>19 a firefighter in which that conversation with Mr Herrera</p> <p>20 had been retold?</p> <p>21 <b>A. No.</b></p> <p>22 Q. Could I ask you, you'll be pleased to know, final</p> <p>23 section of questions, just a range of issues that arise</p> <p>24 out of your statement.</p> <p>25 At page 9 of your witness statement -- we don't need</p> <p style="text-align: center;">Page 65</p>	<p>1 <b>A. Uh-huh.</b></p> <p>2 Q. Can you remember how much and what type of firefighting</p> <p>3 media was left in the stairwell?</p> <p>4 <b>A. No, it was -- no.</b></p> <p>5 Q. Finally, what was your experience of radio</p> <p>6 communications on the night?</p> <p>7 <b>A. We knew before we went in that there was no radio</b></p> <p>8 <b>communications, so I think we didn't use it.</b></p> <p>9 Q. Who told you?</p> <p>10 <b>A. I can't recall.</b></p> <p>11 MR KINNIER: No. Okay.</p> <p>12 Ms Orchard, those are all the questions I have for</p> <p>13 now.</p> <p>14 Sir, I don't know whether the usual application</p> <p>15 for -- it may be, given the time of the morning,</p> <p>16 a longer break may be necessary.</p> <p>17 SIR MARTIN MOORE-BICK: I was going to suggest 10 minutes.</p> <p>18 Is that going to be --?</p> <p>19 MR KINNIER: Thank you, sir.</p> <p>20 SIR MARTIN MOORE-BICK: We are going to have a break now,</p> <p>21 Ms Orchard, for just over 10 minutes. During that time,</p> <p>22 Mr Kinnier will discover whether he has any further</p> <p>23 questions he'd like to ask you, so I'd ask you not to</p> <p>24 talk to anyone about your evidence while you're out of</p> <p>25 the room. We'll resume at 11.40 and see what more he</p> <p style="text-align: center;">Page 67</p>
<p>1 to go to this -- you discussed the water jet and you say</p> <p>2 you were instructed to help operate the water jet.</p> <p>3 First of all, can you remember where this jet was</p> <p>4 set up? It may assist you if Paul puts up the exhibit</p> <p>5 to your witness statement, which is MET00017360.</p> <p>6 Ms Orchard, you'll see there's a bigger screen</p> <p>7 behind you. I don't know whether you're able to stand</p> <p>8 up and point where the water jet you were instructed to</p> <p>9 operate was positioned.</p> <p>10 <b>A. So I think this is the children's playground, isn't it,</b></p> <p>11 <b>here? So the jet was around here somewhere (Indicates).</b></p> <p>12 Q. Thank you. So near the area marked "Ramp" to the left</p> <p>13 of the tower?</p> <p>14 <b>A. Yes.</b></p> <p>15 Q. Okay.</p> <p>16 Can you describe the effect the operation of the jet</p> <p>17 had on the spread of fire?</p> <p>18 <b>A. I think the jet was more dealing with falling debris</b></p> <p>19 <b>that was landing on a sort of shelf above the first</b></p> <p>20 <b>floor, ground floor, and so extinguishing that, more</b></p> <p>21 <b>than -- I mean, we were trying to -- we were a fair</b></p> <p>22 <b>distance from the building, so I think -- and there was</b></p> <p>23 <b>debris falling into the playground as well.</b></p> <p>24 Q. You discuss in your statement discarded hoses in the</p> <p>25 stairwell.</p> <p style="text-align: center;">Page 66</p>	<p>1 has for you, if anything.</p> <p>2 THE WITNESS: Thanks.</p> <p>3 SIR MARTIN MOORE-BICK: All right? So if you would like to</p> <p>4 go with the usher now.</p> <p>5 (The witness withdrew)</p> <p>6 SIR MARTIN MOORE-BICK: Thank you.</p> <p>7 11.40, then, please</p> <p>8 (11.30 am)</p> <p>9 (A short break)</p> <p>10 (11.40 am)</p> <p>11 SIR MARTIN MOORE-BICK: Any more questions, Mr Kinnier?</p> <p>12 MR KINNIER: Three supplementals, sir.</p> <p>13 SIR MARTIN MOORE-BICK: Very good.</p> <p>14 (The witness returned)</p> <p>15 SIR MARTIN MOORE-BICK: I think just a few more questions.</p> <p>16 MR KINNIER: Thank you very much for coming back, just a few</p> <p>17 supplementals, as the chairman indicated.</p> <p>18 First of all, at page 8 of your statement, you refer</p> <p>19 to the fact that -- this is in the fourth paragraph:</p> <p>20 "At Soho we are really busy with AFA (Automatic Fire</p> <p>21 Alarm)s. They are often high up in a building, so I am</p> <p>22 quite used to that kind of journey."</p> <p>23 How normal is it in your experience to have AFAs in</p> <p>24 high-rise buildings?</p> <p>25 <b>A. I don't know how to answer that question, really.</b></p> <p style="text-align: center;">Page 68</p>

1 **It's -- yes, a regular occurrence.**  
 2 Q. Okay.  
 3 Can I now talk to you about flat 113.  
 4 **A. Yes.**  
 5 Q. You were clear in your evidence that when you were  
 6 briefed by the watch manager, you were told there were  
 7 six people in flat 113.  
 8 **A. Mm-hm.**  
 9 Q. You were equally clear in your evidence that only three  
 10 people came out.  
 11 Did that inconsistency occur to you at any stage on  
 12 the way down to the bridgehead?  
 13 **A. It occurred to me immediately, you know, when Pete came**  
 14 **out and that was it, it occurred to me, but I don't**  
 15 **recall whether I just thought it or said anything.**  
 16 **I don't think I did.**  
 17 Q. You said it occurred to you immediately; did you raise  
 18 that point with Pete before you left the 14th floor?  
 19 **A. I don't think so, no.**  
 20 Q. You say you don't think so; is it possible that you  
 21 raised it?  
 22 **A. Yes, it's possible, but I don't think I did.**  
 23 Q. Did you raise it with him as you went down?  
 24 **A. No.**  
 25 Q. Did you raise it, first of all, with him once you got to

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1 the bridgehead?  
 2 **A. No.**  
 3 Q. Did you raise it with anyone at the bridgehead?  
 4 **A. No.**  
 5 Q. Given that you were deployed on an FSG that concerned  
 6 six people --  
 7 **A. Yes.**  
 8 Q. -- and on your evidence, you only saw three come out,  
 9 isn't that information that ought to have been given to  
 10 the watch manager in charge of the bridgehead?  
 11 **A. My assumption was because three people came out of**  
 12 **a smoke-free flat, area, environment, that that was all**  
 13 **that was in there, that they were the only people in**  
 14 **there. I was slightly confused, but as I hadn't been in**  
 15 **the flat, I couldn't really ...**  
 16 Q. When you got down to the bridgehead, you said that you  
 17 were concerned to update them on the difficulties  
 18 regarding seeing floor numbers.  
 19 **A. Yes.**  
 20 Q. Are you clear that there was no further detail you gave  
 21 at the bridgehead as to what had happened on floor 14?  
 22 This is you. Are you sure you gave no further detail on  
 23 what happened?  
 24 **A. I'm pretty confident that's correct.**  
 25 Q. You didn't give any information regarding the numbers

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1 who had come out of flat 113?  
 2 **A. Not that I recall, no.**  
 3 Q. Given you'd only seen three come out, given you were  
 4 deployed to bring back six --  
 5 **A. Yes.**  
 6 Q. -- would you have mentioned the need for a sweep to have  
 7 taken place, either to Pete Herrera when you got back  
 8 down to the bridge -- did you raise that with him?  
 9 **A. No, I didn't raise that with him.**  
 10 Q. Did you raise that with anyone at the bridgehead, the  
 11 officer in charge, for example?  
 12 **A. No, I did not.**  
 13 Q. Did you raise it with anyone after you left the tower  
 14 itself?  
 15 **A. No, I did not.**  
 16 MR KINNIER: Ms Orchard, thank you very much, those are all  
 17 the questions I have, so it just leaves me to say thanks  
 18 very much for your evidence today.  
 19 SIR MARTIN MOORE-BICK: Yes. Thanks very much for coming to  
 20 give evidence, Ms Orchard. You are now free to go, and  
 21 so please go with the usher.  
 22 THE WITNESS: Thank you.  
 23 (The witness was released)  
 24 SIR MARTIN MOORE-BICK: Yes, Mr Kinnier.  
 25 MR KINNIER: Sir, with your permission, may I call Crew

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1 Manager Raoul Codd.  
 2 SIR MARTIN MOORE-BICK: Yes, thank you.  
 3 RAOUL CODD (sworn)  
 4 Questions by MR KINNIER  
 5 SIR MARTIN MOORE-BICK: All right, thank you very much,  
 6 Mr Codd. Sit down and make yourself comfortable.  
 7 MR KINNIER: First of all, would you be able to confirm your  
 8 name for the record, please?  
 9 **A. Raoul Codd.**  
 10 Q. Thank you very much, Mr Codd, for coming along to give  
 11 evidence today. It's much appreciated.  
 12 There should be a blue folder in front of you.  
 13 Behind the first tab, there should be your statement  
 14 dated 18 November 2017.  
 15 **A. That's correct.**  
 16 Q. If you turn over to the next tab, there should be your  
 17 contemporaneous note.  
 18 **A. That's correct.**  
 19 Q. Have you read those documents recently?  
 20 **A. Yes.**  
 21 Q. Do you confirm their contents are true?  
 22 **A. Yes.**  
 23 Q. Are you content for those documents to stand as your  
 24 evidence to the inquiry?  
 25 **A. Yes.**

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18 (Pages 69 to 72)

<p>1 Q. Now, the questioning I will have for you today will</p> <p>2 focus on your two EDBA tasks on the night. If at any</p> <p>3 time you need a break, shout. If any of my questions</p> <p>4 are unclear, say so and I'll try to rectify the matter.</p> <p>5 <b>A. Okay.</b></p> <p>6 Q. If we can deal with some basics, first of all.</p> <p>7 It's right that you are a crew manager in</p> <p>8 development based at Chelsea?</p> <p>9 <b>A. That's correct.</b></p> <p>10 Q. At the time of the fire, you had been a firefighter for</p> <p>11 eight years; is that right?</p> <p>12 <b>A. That's correct.</b></p> <p>13 Q. You were in charge of Chelsea's search and rescue unit</p> <p>14 on the night?</p> <p>15 <b>A. That's correct.</b></p> <p>16 Q. The call sign of that FRU is Golf 346?</p> <p>17 <b>A. Yes.</b></p> <p>18 Q. The other people in your FRU unit were Mr Reddington,</p> <p>19 Ms Upton, Mr Sime and Mr Okoh?</p> <p>20 <b>A. That's correct.</b></p> <p>21 Q. In terms of timings, the LFB's records indicated you</p> <p>22 were mobilised at 01.33, mobile at 01.36 and status 3 at</p> <p>23 01.47. Does that sound about right to you?</p> <p>24 <b>A. That's about right.</b></p> <p>25 Q. Now, in terms of EDBA wear, EDBA disconnect from your</p> <p style="text-align: right;">Page 73</p>	<p>1 was a need for EDBA deployment to the higher floors?</p> <p>2 <b>A. Not that I'm aware of, no.</b></p> <p>3 Q. Were you given any instructions by any senior officer</p> <p>4 whilst at the command unit?</p> <p>5 <b>A. No.</b></p> <p>6 Q. Did you discuss with anyone there what the priorities</p> <p>7 were in terms of the firefighting and rescue mission?</p> <p>8 <b>A. No.</b></p> <p>9 Q. Were you aware of the identity of the incident commander</p> <p>10 when you arrived?</p> <p>11 <b>A. No.</b></p> <p>12 Q. You went to, I think, the holding area near the entrance</p> <p>13 to the tower next; is that right?</p> <p>14 <b>A. That's correct.</b></p> <p>15 Q. We can go to them if need be, but your notes say that</p> <p>16 you were asked to get hose and breaking-in equipment</p> <p>17 from the appliances. Other members of your crew have</p> <p>18 said it was a more general deployment.</p> <p>19 Did you have any view as to whether this was the</p> <p>20 best use of EDBA crew resources on first arrival?</p> <p>21 <b>A. I don't have a view on that, no. But the equipment was</b></p> <p>22 <b>needed, so we just went and got the equipment.</b></p> <p>23 Q. Did you meet the Paddington EDBA crew soon after your</p> <p>24 arrival at the tower?</p> <p>25 <b>A. No, I saw them coming out of the tower.</b></p> <p style="text-align: right;">Page 75</p>
<p>1 appliance at 01.48, and tally out at the bridgehead at</p> <p>2 03.03.</p> <p>3 <b>A. Okay.</b></p> <p>4 Q. Does that sound about right to you there?</p> <p>5 <b>A. Yes.</b></p> <p>6 Q. Thank you.</p> <p>7 Mr Codd, it would help, I think, if you kept your</p> <p>8 voice up. I think you're probably a quietly spoken man.</p> <p>9 It's just so everyone can hear and, most in particular,</p> <p>10 the transcribers.</p> <p>11 Now, if I could turn to the first topic, and that's</p> <p>12 the time at which you entered into the building.</p> <p>13 Initially you went to the command unit to hand in</p> <p>14 your nominal roll board; is that right?</p> <p>15 <b>A. That is correct.</b></p> <p>16 Q. Did you expect your crew to wait for you before going</p> <p>17 into the building?</p> <p>18 <b>A. My crew -- I met them at the base of the tower where the</b></p> <p>19 <b>rest of the BA wearers were all in a queue waiting to go</b></p> <p>20 <b>into the tower.</b></p> <p>21 Q. When you were at the CU, were you told whether there</p> <p>22 were any other FRUs at the scene by that stage?</p> <p>23 <b>A. I wasn't aware of any, no.</b></p> <p>24 Q. When you were at the command unit or, indeed, when you</p> <p>25 went to the tower, did any senior officer suggest there</p> <p style="text-align: right;">Page 74</p>	<p>1 Q. Did you have any discussion with them?</p> <p>2 <b>A. No.</b></p> <p>3 Q. As we understand it, Mr Reddington took a proactive view</p> <p>4 with the station manager at the tower and said, "This</p> <p>5 is your only FRU crew, we're FRU and we need to get in</p> <p>6 there." Did you overhear that conversation?</p> <p>7 <b>A. Yes, I did.</b></p> <p>8 Q. Is that a fair summary of what Mr Reddington said?</p> <p>9 <b>A. Like I said, we saw Paddington's crew coming out and so,</b></p> <p>10 <b>yeah, that is fair.</b></p> <p>11 Q. Do you know who the station manager was at the entrance</p> <p>12 to the tower to whom Mr Reddington was talking?</p> <p>13 <b>A. No, I don't, sorry.</b></p> <p>14 Q. Am I right in assuming that the discussion took place at</p> <p>15 the entrance to the tower or was it within the lobby</p> <p>16 inside the tower, can you remember?</p> <p>17 <b>A. At the entrance to the tower.</b></p> <p>18 Q. Were you given any briefing by the station manager who</p> <p>19 was at the entrance to the tower with whom Mr Reddington</p> <p>20 was talking?</p> <p>21 <b>A. No.</b></p> <p>22 Q. In the lobby stage, did any senior officer seek to</p> <p>23 prioritise the deployment of EDBA?</p> <p>24 <b>A. Not that I'm aware of, no.</b></p> <p>25 Q. Could I now turn to the BA entry when you entered the</p> <p style="text-align: right;">Page 76</p>

<p>1 tower under air and your deployment.</p> <p>2 Is it right that you lost contact with your crew in</p> <p>3 the reception area of the tower?</p> <p>4 <b>A. I lost contact with two of my crew, yes.</b></p> <p>5 Q. Did you go then, once you were in the tower, straight to</p> <p>6 the bridgehead? How much time did you spend waiting, if</p> <p>7 you were waiting?</p> <p>8 <b>A. I can't recall.</b></p> <p>9 Q. When you got to the bridgehead, is it right that it was</p> <p>10 on the 3rd floor at this stage?</p> <p>11 <b>A. Yes.</b></p> <p>12 Q. Can you describe for us what the smoke conditions were</p> <p>13 that you found?</p> <p>14 <b>A. Just light smoke in there at the time.</b></p> <p>15 Q. Did you see any casualties being brought down whilst you</p> <p>16 were waiting either at the lobby or at the bridgehead?</p> <p>17 <b>A. No.</b></p> <p>18 Q. Can you give us an idea of what the conditions were like</p> <p>19 at the bridgehead? I think you describe them in your</p> <p>20 statement graphically as a battle scene.</p> <p>21 <b>A. Yeah, there was a lot of people, a lot of information</b></p> <p>22 <b>being passed about as well.</b></p> <p>23 Q. I think other witnesses have used the phrase "organised</p> <p>24 chaos". What would you say to that description?</p> <p>25 <b>A. A fair statement.</b></p> <p style="text-align: right;">Page 77</p>	<p>1 <b>A. This could be the confusion with SDBA and EDBA, not sure</b></p> <p>2 <b>of what was required at that time.</b></p> <p>3 Q. Okay.</p> <p>4 You also say in your witness statement -- we can go</p> <p>5 to it if needs be -- that there were "loads of governors</p> <p>6 deploying crews on FSG tasks".</p> <p>7 Can you describe for us how firefighters were being</p> <p>8 allocated FSG tasks, or being detailed with their FSG,</p> <p>9 rather?</p> <p>10 <b>A. When we got to the bridgehead, we were tasked of an FSG</b></p> <p>11 <b>where -- what floor and what room to search, for search</b></p> <p>12 <b>and recovery, and each crew that went up was given</b></p> <p>13 <b>a different task to do.</b></p> <p>14 Q. Could I ask Paul to bring up MET00015819.</p> <p>15 Do you recall seeing this writing on the wall at the</p> <p>16 3rd floor?</p> <p>17 <b>A. No.</b></p> <p>18 Q. Do you recall Watch Manager De Silvo writing on the wall</p> <p>19 at the bridgehead at the time you were deployed?</p> <p>20 <b>A. Watch Manager De Silvo was about the same distance that</b></p> <p>21 <b>you are from me, so she could well have been writing on</b></p> <p>22 <b>the wall.</b></p> <p>23 Q. Did you --</p> <p>24 <b>A. I didn't witness it, no.</b></p> <p>25 Q. Do you recall her writing on it?</p> <p style="text-align: right;">Page 79</p>
<p>1 Q. Could I ask Paul to bring up your contemporaneous notes,</p> <p>2 MET00005624, and there you'll see at point 17 you say:</p> <p>3 "There was a lot of confusion with the LC at ground</p> <p>4 level and bridgehead. Very bad comms."</p> <p>5 First of all, what or who is LC, if you want to</p> <p>6 refresh your memory there?</p> <p>7 <b>A. I have no idea. It's actually "IC", it could be,</b></p> <p>8 <b>incident command. Not LC.</b></p> <p>9 Q. If it were IC, does that help you in your recollection</p> <p>10 in any way, shape or form?</p> <p>11 <b>A. No.</b></p> <p>12 Q. When you say "Very bad comms", could you expand on that</p> <p>13 view, please?</p> <p>14 <b>A. That is referring to our handsets, et cetera, the</b></p> <p>15 <b>radios. There was no communication through the radio,</b></p> <p>16 <b>et cetera. That's referring to that. Not referring to</b></p> <p>17 <b>communication between people.</b></p> <p>18 Q. Okay.</p> <p>19 Doing the best you can, clearly you felt it was</p> <p>20 sufficiently important to record it in your</p> <p>21 contemporaneous note that there was a lot of confusion</p> <p>22 at ground level and bridgehead.</p> <p>23 Well, given the activities that were conducted at</p> <p>24 ground level and the bridgehead, what confusion do you</p> <p>25 think you had in mind there?</p> <p style="text-align: right;">Page 78</p>	<p>1 <b>A. No.</b></p> <p>2 Q. Do you have any -- okay.</p> <p>3 Can I ask you about your instructions when you were</p> <p>4 deployed.</p> <p>5 Is it right that you were partnered with someone</p> <p>6 called John?</p> <p>7 <b>A. Yes.</b></p> <p>8 Q. Do you remember his surname?</p> <p>9 <b>A. No.</b></p> <p>10 Q. Watch Manager De Silvo believed that you were referring</p> <p>11 to Firefighter Joseph from Euston. Does that ring</p> <p>12 a bell at all?</p> <p>13 <b>A. Yes, that's it, Joseph.</b></p> <p>14 Q. The LFB telemetry records indicate that he tallied out</p> <p>15 at 03.05 and tallied back in at 03.20. Does that sound</p> <p>16 as if he was the man with whom you were partnered?</p> <p>17 <b>A. Yes.</b></p> <p>18 Q. Given the state of the fire when you arrived at 01.47</p> <p>19 and the height of the tower itself, do you think you</p> <p>20 could and should have been deployed as an EDBA crew</p> <p>21 before 03.05?</p> <p>22 <b>A. Yes.</b></p> <p>23 Q. Could you have volunteered yourself sooner, do you</p> <p>24 think?</p> <p>25 <b>A. I don't think so, no.</b></p> <p style="text-align: right;">Page 80</p>

<p>1 Q. Why not?</p> <p>2 <b>A. Because, like I said to you, Paddington were already in</b></p> <p>3 <b>there when we turned up -- it seemed seconds before we</b></p> <p>4 <b>got deployed anyway, so -- but when you put the time to</b></p> <p>5 <b>it, it's totally different.</b></p> <p>6 Q. The instruction you were given was to go to the 22nd</p> <p>7 floor. Were you given any other detail as to the flat</p> <p>8 or flats you had to go to on the 22nd floor?</p> <p>9 <b>A. Yes, we were detailed a flat, but I couldn't tell you</b></p> <p>10 <b>the number.</b></p> <p>11 Q. Did you record the flat number? Could it have been 159?</p> <p>12 <b>A. I'm not sure, sorry.</b></p> <p>13 Q. Mr Joseph said his task was to get to the 21st floor and</p> <p>14 search flat 159. Does that have any recollection?</p> <p>15 <b>A. No.</b></p> <p>16 Q. Watch Manager De Silvo stated in her statement that she</p> <p>17 briefed you and Firefighter Joseph to go to the 23rd</p> <p>18 floor, flats 204 and 205. Does that ring any bells?</p> <p>19 <b>A. No.</b></p> <p>20 Q. In terms of any other detail on your instruction, were</p> <p>21 you told how many occupants would be within the flat to</p> <p>22 which you were designated?</p> <p>23 <b>A. No.</b></p> <p>24 Q. Were you given any idea of what smoke conditions were</p> <p>25 like on the stairwell going up?</p> <p style="text-align: center;">Page 81</p>	<p>1 <b>A. Yes, that's correct.</b></p> <p>2 Q. How would you describe that smoke?</p> <p>3 <b>A. Very thick, black smoke.</b></p> <p>4 Q. You lost visibility and you didn't realise for some time</p> <p>5 that Mr Joseph wasn't with you; is that right?</p> <p>6 <b>A. I lost him on one of the floors. We saw a firefighter</b></p> <p>7 <b>coming down with casualties, and I swear I do believe</b></p> <p>8 <b>that I lost him.</b></p> <p>9 Q. When you realised you'd lost him, you appear to have</p> <p>10 carried on alone regardless.</p> <p>11 First of all, is that right, is that a fair summary</p> <p>12 of your evidence?</p> <p>13 <b>A. Yes.</b></p> <p>14 Q. Why did you go on alone?</p> <p>15 <b>A. Because I had a task to do.</b></p> <p>16 Q. One of the things that's come through the evidence we've</p> <p>17 heard thus far is the importance of BA crews staying</p> <p>18 together.</p> <p>19 First of all, do you agree with that?</p> <p>20 <b>A. In normal circumstances, yes.</b></p> <p>21 Q. So why did you decide to proceed regardless, given the</p> <p>22 normal importance of BA crews staying together?</p> <p>23 <b>A. Because this wasn't a normal fire.</b></p> <p>24 Q. Would you have been able to bring down casualties on</p> <p>25 your own, looking at the practical side?</p> <p style="text-align: center;">Page 83</p>
<p>1 <b>A. We were told it is getting smoky, but we knew that</b></p> <p>2 <b>anyway.</b></p> <p>3 Q. Were you given detail of any FSG calls that had been</p> <p>4 received in relation to that floor?</p> <p>5 <b>A. Not for that floor, no.</b></p> <p>6 Q. Any other floor?</p> <p>7 <b>A. I knew of FSG calls being taken.</b></p> <p>8 Q. In a general sense or --</p> <p>9 <b>A. Yes.</b></p> <p>10 Q. Were you given any idea, just for the avoidance of</p> <p>11 doubt, as to whether there were adults or children</p> <p>12 within the flat that was subject to the FSG?</p> <p>13 <b>A. No.</b></p> <p>14 Q. Were you briefed that there was a possibility that the</p> <p>15 occupants may have left the relevant flat?</p> <p>16 <b>A. No.</b></p> <p>17 Q. Did you notice when you were at the bridgehead whether</p> <p>18 there was any system to record the deployment of EDDBA</p> <p>19 crews in response to FSGs?</p> <p>20 <b>A. It would've been the same as SDBA.</b></p> <p>21 Q. Okay.</p> <p>22 Now, in terms of your deployment to the 22nd floor</p> <p>23 itself, dealing first with conditions and the situation</p> <p>24 on the stairwell, you say in your statement there was</p> <p>25 smoke from the 6th floor onwards; is that right?</p> <p style="text-align: center;">Page 82</p>	<p>1 <b>A. I did.</b></p> <p>2 Q. But given the smoke condition by the time you got up</p> <p>3 there and back down, would you have been able to bring</p> <p>4 them down safely, I suppose is the question that people</p> <p>5 have in mind?</p> <p>6 <b>A. In normal circumstances, possibly not.</b></p> <p>7 Q. In terms of radio communications, what was your</p> <p>8 experience of radio communications as you went up the</p> <p>9 tower?</p> <p>10 <b>A. I had no radio communication at all.</b></p> <p>11 Q. Did you have no radio comms from the very start or did</p> <p>12 it disappear as you went up the tower, can you help us?</p> <p>13 <b>A. I'm not sure.</b></p> <p>14 Q. Okay.</p> <p>15 You reach floor 12. Can I ask you to turn to page 4</p> <p>16 of your witness statement, and it's four lines from the</p> <p>17 bottom. You say this:</p> <p>18 "As I've gone up the stairs I got to the landing, I</p> <p>19 was just about to turn the turn to the next flight of</p> <p>20 stairs when these three kids appeared. Two girls who</p> <p>21 I think were oriental and a young lad who I think was</p> <p>22 mixed heritage. The eldest one just cuddled me, I think</p> <p>23 out of relief. It was really weird, they had no signs</p> <p>24 of smoke inhalation and they weren't coughing."</p> <p>25 Did they say which flat they'd come from or which</p> <p style="text-align: center;">Page 84</p>

<p>1 floor they'd come from?</p> <p>2 <b>A. No.</b></p> <p>3 Q. Did you ask them?</p> <p>4 <b>A. At the time, no.</b></p> <p>5 Q. Okay.</p> <p>6 If I could ask Paul to bring up MET00016072_0043.</p> <p>7 That isn't the reference I was after, but I'll come</p> <p>8 on to this, Mr Codd, again.</p> <p>9 But you took the three individuals back down to the</p> <p>10 bridgehead; is that right?</p> <p>11 <b>A. That's correct.</b></p> <p>12 Q. What debrief did you give at the bridgehead?</p> <p>13 <b>A. That I didn't make the objective.</b></p> <p>14 Q. On the way down, were you able to get any information as</p> <p>15 to where the three individuals -- which flat they'd come</p> <p>16 from, which floor they'd come from?</p> <p>17 <b>A. No.</b></p> <p>18 Q. Am I right in thinking that they weren't able to give</p> <p>19 you that information?</p> <p>20 <b>A. When I got to the bottom, someone had taken them out</b></p> <p>21 <b>before I could ask any more questions.</b></p> <p>22 Q. Okay.</p> <p>23 If I could ask you to turn to the top of page 5 of</p> <p>24 your witness statement.</p> <p>25 Apologies, I'm backtracking slightly, going back to</p> <p style="text-align: right;">Page 85</p>	<p>1 On their way down, could any of the evacuees walk</p> <p>2 freely, ie without assistance?</p> <p>3 <b>A. All three of them could.</b></p> <p>4 Q. You get to the bridgehead. You tallied out at 03.17.</p> <p>5 Is it right that by the time you got down there, the</p> <p>6 bridgehead had moved to the ground floor?</p> <p>7 <b>A. That is correct.</b></p> <p>8 Q. In answer to a previous question, you told them you</p> <p>9 hadn't been able to get to floor 22; is that right?</p> <p>10 <b>A. That is correct.</b></p> <p>11 Q. Were you given any update as to what the position was in</p> <p>12 relation to the FSG call in relation to the 22nd floor?</p> <p>13 <b>A. No.</b></p> <p>14 Q. One notable characteristic of your evidence is you</p> <p>15 describe it was "freaky", to use your words, that when</p> <p>16 you met the three individuals on the 12th floor, they</p> <p>17 weren't coughing.</p> <p>18 Did you explain that at the bridgehead, that you'd</p> <p>19 encountered them and they didn't seem to be coughing?</p> <p>20 <b>A. No, I didn't.</b></p> <p>21 Q. Do you think that information was relevant to the</p> <p>22 ability to get people down from the tower, that you'd</p> <p>23 encountered three individuals who didn't appear to be</p> <p>24 experiencing respiratory problems?</p> <p>25 <b>A. I don't think so, no.</b></p> <p style="text-align: right;">Page 87</p>
<p>1 where you were on the stairs, just after you'd met the</p> <p>2 children. You'd just mentioned that the children</p> <p>3 weren't coughing:</p> <p>4 "It was freaky. I didn't take my set off, it was</p> <p>5 like, when you go deep diving and it goes really quiet.</p> <p>6 That's what the building was like, a sort of silence,</p> <p>7 I could hear crackling every now and then and the heat</p> <p>8 was so intense. I could hear banging on the doors. It</p> <p>9 was a split second when I thought, do I take the kids</p> <p>10 down or should I let them go down on their own and find</p> <p>11 out what the banging was. I took the kids down."</p> <p>12 When you say you heard banging on the doors --</p> <p>13 I know these are difficult questions given the time</p> <p>14 that's passed -- can you remember on which floor those</p> <p>15 doors were being banged? Was it the floor on which you</p> <p>16 were on, somewhere around the 12th floor?</p> <p>17 <b>A. It was quite hard to work out where they were from, but</b></p> <p>18 <b>I would surmise it was the floor that I was on.</b></p> <p>19 Q. When you were going down the stairwell, did you pass any</p> <p>20 of these evacuees to Firefighter Joseph at any stage, do</p> <p>21 you think?</p> <p>22 <b>A. No.</b></p> <p>23 Q. And you're absolutely certain about that?</p> <p>24 <b>A. Yes.</b></p> <p>25 Q. Okay.</p> <p style="text-align: right;">Page 86</p>	<p>1 Q. Why not?</p> <p>2 <b>A. The reason I used the word "freaky" was because I didn't</b></p> <p>3 <b>expect to see anyone walking down as I was walking up,</b></p> <p>4 <b>and especially three children on their own.</b></p> <p>5 Q. Paul, could you put up MET00015815.</p> <p>6 Do you remember seeing these markings on the lobby</p> <p>7 walls at any time on the night?</p> <p>8 <b>A. No.</b></p> <p>9 Q. So none of the information would have registered with</p> <p>10 you?</p> <p>11 <b>A. No.</b></p> <p>12 Q. In relation to the three casualties, the three evacuees,</p> <p>13 you'd brought down, did you have any contact with them</p> <p>14 later on in the night?</p> <p>15 <b>A. No, I didn't see them anymore.</b></p> <p>16 Q. Did you know what had happened to them?</p> <p>17 <b>A. No.</b></p> <p>18 Q. Were you able to establish that in fact the females had</p> <p>19 come from floor 22?</p> <p>20 <b>A. No.</b></p> <p>21 Q. Do you recall speaking with one of them or hearing them</p> <p>22 speaking to another firefighter to tell them that there</p> <p>23 were a number of people left on the 22nd floor in</p> <p>24 flat 193?</p> <p>25 <b>A. No.</b></p> <p style="text-align: right;">Page 88</p>

<p>1 Q. And you are certain you didn't overhear a conversation 2 along those lines?</p> <p>3 <b>A. I didn't see them once I'd took them down.</b></p> <p>4 Q. Talking about your communications with other 5 firefighters once you'd come down, did you talk to any 6 other firefighters, whether at the bridgehead or 7 outside, as to who hadn't been able to complete their 8 FSG missions or how far they'd got and --</p> <p>9 <b>A. No.</b></p> <p>10 Q. Okay.</p> <p>11 If I could ask you to turn to page 9 of your witness 12 statement, and it's 12 lines down. You say this: 13 "On the 22nd floor there was a family of five that 14 I never got to. I didn't know until about a week later, 15 the BBC put Grenfell Tower up and put faces to the 16 floors, I spoke with Lou about it. I don't think 17 I could have got up there, the visor on my helmet is all 18 blistered and I didn't even have it down so it shows the 19 heat in there."</p> <p>20 First of all, is the Lou you're referring to there 21 Watch Manager De Silvo?</p> <p>22 <b>A. Yes.</b></p> <p>23 Q. Why did you think you couldn't have got up there alone?</p> <p>24 <b>A. Because I brought the three children down, and if</b> 25 <b>I hadn't have met them, the heat was getting intense.</b></p> <p style="text-align: center;">Page 89</p>	<p>1 problems to anyone else at the bridgehead or to any 2 other firefighters?</p> <p>3 <b>A. No.</b></p> <p>4 Q. You had a second EDBA task in the evening. Is it right 5 that you were later redeployed with Chelsea crew members 6 Upton and Reddington and another to go to the 12th floor 7 to do a search and rescue?</p> <p>8 <b>A. That's correct.</b></p> <p>9 Q. What were the details of the briefing you were given in 10 relation to that second EDBA task?</p> <p>11 <b>A. It was a search and recovery.</b></p> <p>12 Q. Can you help us with the words that were used or the 13 gist of the words that were used?</p> <p>14 <b>A. Sorry. So, basically, go to the 12th floor, search the</b> 15 <b>rooms and look for casualties and escort them out of the</b> 16 <b>building.</b></p> <p>17 Q. Can you remember who briefed you?</p> <p>18 <b>A. No.</b></p> <p>19 Q. Can you remember what rank? A white helmet or above?</p> <p>20 <b>A. Yes, it would've been a watch manager or above.</b></p> <p>21 Q. Did you tell the individual who had briefed you of your 22 unsuccessful mission to the 22nd floor?</p> <p>23 <b>A. No.</b></p> <p>24 Q. Your tally out time for this mission is 05.22 and tally 25 in at 05.47. Does that sound about right to you?</p> <p style="text-align: center;">Page 91</p>
<p>1 Q. So the reason you couldn't have got up there was 2 a combination of encountering the casualties and the 3 smoke conditions you encountered on the way up and the 4 heat?</p> <p>5 <b>A. Correct.</b></p> <p>6 Q. When I asked you earlier on, given that you decided to 7 go off on your own, and reflecting on the answer you 8 gave to that question, given that you had gone off on 9 your own, do you think it was safe for you to have done 10 so to try and get to the 22nd floor given the conditions 11 that were later encountered?</p> <p>12 <b>A. At the time, I still was going by yes, it was.</b></p> <p>13 Q. Would it have assisted, do you think, if EDBA teams were 14 deployed in larger numbers? So instead of two, for 15 example, there were four? Would that have helped 16 matters?</p> <p>17 <b>A. No.</b></p> <p>18 Q. Why do you think that?</p> <p>19 <b>A. It's easier in twos than it is in a bigger group.</b></p> <p>20 Q. Could you expand on that, please?</p> <p>21 <b>A. Well, my second wear, there was a team of four of us,</b> 22 <b>and it just gets harder to, like, monitor everyone.</b> 23 <b>It's standard for two people to -- EDBA.</b></p> <p>24 Q. Did you mention the freaky nature that you encountered 25 with the three individuals not showing any respiratory</p> <p style="text-align: center;">Page 90</p>	<p>1 <b>A. Possibly, yeah.</b></p> <p>2 Q. Could you explain to us how your search on the 3 12th floor was carried out, just take us through each 4 step.</p> <p>5 <b>A. So we used the internal staircase again, and we -- I do</b> 6 <b>believe we got to the 12th floor as a team of four. And</b> 7 <b>as we went into what I would class as a communal hallway</b> 8 <b>for the flats, we then came across a casualty in the</b> 9 <b>doorway. One of the crew whose name I don't know's ADSU</b> 10 <b>actuated and I had to send him down, but before we did</b> 11 <b>send him down, we confirmed if the casualty that was</b> 12 <b>lying on the floor was conscious, breathing or had</b> 13 <b>a pulse, and they didn't have a pulse --</b></p> <p>14 Q. Okay.</p> <p>15 <b>A. -- at the time.</b></p> <p>16 Q. On returning to the bridgehead, who did you debrief?</p> <p>17 <b>A. Whoever was there at the bridgehead at the time.</b></p> <p>18 Q. Can you remember what you said, either the words or the 19 gist of the words?</p> <p>20 <b>A. Similar to what I've just said, yeah.</b></p> <p>21 Q. Did you mention at this stage your first unsuccessful 22 mission to the 22nd floor as part of your debrief?</p> <p>23 <b>A. I would've already said that when I came down the first</b> 24 <b>time on my first wear, but I didn't mention it again,</b> 25 <b>no.</b></p> <p style="text-align: center;">Page 92</p>

1 Q. When you went back on your second EDDBA task, would it  
2 have helped to have had a thermal imaging camera, do you  
3 think?  
4 **A. No.**  
5 Q. Why do you say that?  
6 **A. Because it was search and recovery, and we done a normal**  
7 **BA search pattern, which we're trying to do. It was**  
8 **very dark, and even our torches weren't beneficial.**  
9 Q. When would it be useful to have a thermal imaging  
10 camera?  
11 **A. A thermal imaging camera is useful, but at that time**  
12 **I didn't think it was to us.**  
13 Q. In what circumstances is it useful though?  
14 **A. In any fire circumstance, but at that time we were**  
15 **picking up stuff on the stairways as we went up, like**  
16 **breaking-in equipment, and at the time there wasn't**  
17 **a thermal imaging camera to pick up, so we just went up**  
18 **as a team of four.**  
19 MR KINNIER: Mr Codd, those are all the questions I have for  
20 you. There may well be some others.  
21 So, sir, might I ask you to rise for 5 minutes?  
22 SIR MARTIN MOORE-BICK: Usual 5-minute break?  
23 MR KINNIER: Yes.  
24 SIR MARTIN MOORE-BICK: Mr Codd, we'll break for 5 minutes  
25 just so that Mr Kinnier can check whether there are any

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1 further questions he needs to ask you.  
2 THE WITNESS: Okay, thank you.  
3 SIR MARTIN MOORE-BICK: Please don't talk to anyone about  
4 your evidence while you're out of the room, and we'll be  
5 back in at 12.20. If you would like to go with the  
6 usher, please.  
7 (The witness withdrew)  
8 SIR MARTIN MOORE-BICK: Good, 12.20, please.  
9 (12.15 pm)  
10 (A short break)  
11 (12.20 pm)  
12 SIR MARTIN MOORE-BICK: Well, Mr Kinnier.  
13 MR KINNIER: Sir, I'm pleased to say there are no  
14 supplemental questions and so, in those circumstances,  
15 Mr Codd is free to go.  
16 SIR MARTIN MOORE-BICK: Right. He's waiting to come in, so  
17 would you like to bring him in for a moment and we'll  
18 clarify the position for him.  
19 (The witness returned)  
20 SIR MARTIN MOORE-BICK: Mr Codd, I asked that you come in,  
21 but all we have to tell you is we don't have any more  
22 questions for you.  
23 THE WITNESS: Thank you.  
24 SIR MARTIN MOORE-BICK: Well, that may be a relief, I don't  
25 know. But thank you very much for coming to give your

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1 evidence, it's a great help.  
2 THE WITNESS: Thank you.  
3 SIR MARTIN MOORE-BICK: And you are now free to go. You can  
4 go with the usher.  
5 THE WITNESS: Thank you very much.  
6 (The witness was released)  
7 SIR MARTIN MOORE-BICK: Yes, Mr Kinnier.  
8 MR KINNIER: Sir, the fourth witness this morning I'd like  
9 to call is Firefighter Katie Foster.  
10 SIR MARTIN MOORE-BICK: Yes, thank you.  
11 KATIE FOSTER (affirmed)  
12 Questions by MR KINNIER  
13 SIR MARTIN MOORE-BICK: Thank you very much, Ms Foster. Sit  
14 down and make yourself comfortable.  
15 Yes, Mr Kinnier.  
16 MR KINNIER: Would you please confirm your name for the  
17 record.  
18 **A. Katie Foster.**  
19 Q. Good morning.  
20 First of all, thank you very much for coming along  
21 today. It's very much appreciated.  
22 Now, the focus of my questions this morning are  
23 going to be on your FSG mission to the 18th floor.  
24 That's the principal matter I'm going to ask you to deal  
25 with.

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1 **A. Yes.**  
2 Q. Now that's done, can we turn to the procedural matters.  
3 In front of you is a blue folder, and if you could open  
4 that up, hopefully behind the first tab is your  
5 statement dated 28 December of last year; is that right?  
6 **A. Yes.**  
7 Q. If you turn over to the next tab, hopefully you'll find  
8 your contemporaneous notes; is that right?  
9 **A. Yes, that's correct.**  
10 Q. If you turn over to the final tab, hopefully you'll find  
11 the exhibit to your police statement, which is a floor  
12 plan of the 18th floor of the tower; is that right?  
13 **A. Yes, that's correct.**  
14 Q. Have you read those documents recently?  
15 **A. Yes.**  
16 Q. Do you confirm their contents are true?  
17 **A. I do. There's a slight mistake on my behalf about my**  
18 **training. I've just got the venues wrong for the**  
19 **duration that I was there for. So I was at Park Royal**  
20 **for three weeks and Harrow for two rather than the other**  
21 **way round, but --**  
22 **SIR MARTIN MOORE-BICK: Would you like us to get that right**  
23 **now?**  
24 **A. If you could, please, yes.**  
25 **SIR MARTIN MOORE-BICK: Of course, we'll do that.**

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24 (Pages 93 to 96)



<p>1 MR KINNIER: I think it's on your first page of your witness 2 statement in the third paragraph. 3 SIR MARTIN MOORE-BICK: Yes. 4 MR KINNIER: Do we swap Park Royal for Harrow and vice 5 versa? 6 <b>A. Yes, so Park Royal was the second venue, but it was 7 three weeks and Harrow was the final two weeks.</b> 8 <b>SIR MARTIN MOORE-BICK: Good. Thank you very much.</b> 9 MR KINNIER: Subject to that amendment, are you content for 10 the statement, contemporaneous note and exhibit to stand 11 as your evidence to the inquiry? 12 <b>A. Yes.</b> 13 Q. Now, if any of my questions are unclear, please say so 14 and I'll try and get it right and rephrase them so 15 they're clear. 16 Secondly, if at any time you need a break, please 17 say so, it's not a problem. 18 The first thing I'd like to do is just cover some 19 basic information with you, if that's all right. 20 First of all, at the time of the fire, you were 21 a firefighter based at Willesden; is that right? 22 <b>A. Yes, that's correct.</b> 23 Q. You were a probationer who started in May 2017? 24 <b>A. That's correct.</b> 25 Q. So roughly six weeks before the fire?</p> <p style="text-align: right;">Page 97</p>	<p>1 that switching on 11 minutes before you tallied out have 2 any consequence for the amount of air you have? 3 <b>A. No, it's simply just to turn the cylinder on so you're 4 ready, basically, once you've received your brief to go 5 straight under air. So I was just -- I think because 6 I'd come straight out of training, it was something we 7 were quite used to doing, so, yeah.</b> 8 Q. The first topic I'd like to discuss with you today is 9 your entry under air and your deployment generally. 10 We don't need to go to it, but at page 5 of your 11 witness statement you describe that on arrival, you made 12 your way to the bridgehead. 13 Was this you, Mr Lawson, Mr Welch and Mr Eden? 14 <b>A. Yes. I think just the four of us. I think 15 I remember -- yes.</b> 16 Q. Mr Welch and Mr Eden appear to have been deployed at 17 01.59, whereas you tallied out at 01.53. Do you know 18 why there was a six-minute difference? Can you remember 19 now? 20 <b>A. I think there was quite a large queue waiting to go in, 21 so I think me and Firefighter Lawson were before them 22 and there may have been another crew behind us, for the 23 reason for the delay, I think.</b> 24 Q. How would you describe the degree of organisation at the 25 bridgehead?</p> <p style="text-align: right;">Page 99</p>
<p>1 <b>A. Yes, I passed out roughly six weeks before, I believe.</b> 2 Q. The appliance you were in on the night, the call sign 3 was Golf 281; is that right? 4 <b>A. That's correct.</b> 5 Q. Your BA partner on the night was Firefighter 6 Greg Lawson? 7 <b>A. Yes, that's correct.</b> 8 Q. Also part of the crew were Crew Manager Cardy -- 9 <b>A. Watch Manager Cardy.</b> 10 Q. Sorry, Watch Manager Cardy, Firefighter Tom Welch and is 11 it Crew Manager Eden? 12 <b>A. Yes, that's correct.</b> 13 Q. As to timings, LFB records indicate that you were 14 mobilised at 01.26, mobile at 01.28 and at the scene at 15 01.40. Does that sound about right to you? 16 <b>A. It does, yes.</b> 17 Q. In terms of timings of SDBA wear, again the LFB records 18 indicate that the SDBA was disconnected from your 19 appliance at 01.43, switched on at 01.42 and you tallied 20 out at the bridgehead at 01.53. Again, does that sound 21 about right? 22 <b>A. It does, yes.</b> 23 Q. Thank you. 24 Now, it appears that you switched on the BA set at 25 01.42 and tallied out at the bridgehead at 01.53. Does</p> <p style="text-align: right;">Page 98</p>	<p>1 <b>A. It was, from what I remember, quite hectic. Obviously 2 not having much experience since training, it was -- 3 there was just people everywhere. But, yeah, I guess 4 it's obviously not the same as training, so --</b> 5 Q. If I could ask you about your instructions. Can you 6 remember who it was who gave you your instructions? 7 <b>A. I don't recall.</b> 8 Q. Was it a man or a woman? 9 <b>A. It was a man.</b> 10 Q. Did he have an Irish accent? 11 <b>A. I don't recall.</b> 12 Q. Was he wearing a white helmet? 13 <b>A. He was, yes.</b> 14 Q. If I could ask you to turn to page 5 of your witness 15 statement, and it will come up on the screen, which may 16 be easier for you, Ms Foster. 17 <b>A. Yes.</b> 18 Q. At page 5, the first substantive paragraph on that page, 19 lines 1 to 3, you say this: 20 "I was paired with Fire Fighter Greg LAWSON and 21 after going through into Entry Control we were given our 22 brief by an officer wearing a white helmet. I did not 23 get his name or rank. Our brief was that there is Fire 24 Survival guidance call on the 18th floor and we were to 25 go up and see who is there. The Fire Survival Guidance</p> <p style="text-align: right;">Page 100</p>

<p>1 call related to a resident on the 18th floor who was</p> <p>2 currently on the phone taking advice from a controller</p> <p>3 whose name I do not know about what course of action to</p> <p>4 take. I don't know what advice was given at the time</p> <p>5 but I remember thinking to myself that it was a long way</p> <p>6 to go with a Standard Duration Breathing Apparatus as</p> <p>7 opposed to on a Fire Rescue Unit where you have an</p> <p>8 Extended Duration Breathing Apparatus where two</p> <p>9 cylinders which provide more air."</p> <p>10 Were you told that the occupant was currently on the</p> <p>11 phone or was that your assumption?</p> <p>12 <b>A. I don't remember, actually, whether it was just what I'd</b></p> <p>13 <b>assumed or not.</b></p> <p>14 Q. Are you able to help us with any more detail that you</p> <p>15 were provided when you were given your instructions at</p> <p>16 the bridgehead?</p> <p>17 <b>A. I remember, just as what I've said in my statement, it</b></p> <p>18 <b>was quite brief. No sort of flat numbers or how many</b></p> <p>19 <b>people, it was just go to the 18th floor and see who is</b></p> <p>20 <b>there, basically.</b></p> <p>21 Q. Were you given a plan or a layout of each floor in the</p> <p>22 tower?</p> <p>23 <b>A. Not that I can remember, no.</b></p> <p>24 Q. I assume from what you've said you weren't given any</p> <p>25 details about any occupants who had any vulnerability or</p> <p style="text-align: center;">Page 101</p>	<p>1 Q. Did Greg?</p> <p>2 <b>A. I don't remember.</b></p> <p>3 Q. In the last three lines of the paragraph I just quoted,</p> <p>4 for the record, you say that you remember thinking to</p> <p>5 yourself it was a long way to go with SDBA. Are you all</p> <p>6 right -- refresh your memory.</p> <p>7 <b>A. Yes.</b></p> <p>8 Q. Did you raise your concern or that observation with Greg</p> <p>9 before you were deployed?</p> <p>10 <b>A. Not that I recall at that time, no.</b></p> <p>11 Q. Do you remember him saying anything, either to you or to</p> <p>12 the officer giving you the instructions at the</p> <p>13 bridgehead?</p> <p>14 <b>A. No.</b></p> <p>15 Q. The fact that you'd already had your BA set on for</p> <p>16 10/11 minutes, would that have affected your ability to</p> <p>17 get up to the 18th floor?</p> <p>18 <b>A. No, so when you turn the cylinder on, you operate</b></p> <p>19 <b>a first breath button, which will only then allow you to</b></p> <p>20 <b>breathe once you actually put the mask on, so it won't</b></p> <p>21 <b>actually affect what's inside the cylinder.</b></p> <p>22 Q. That answer flows to another question. You were</p> <p>23 deployed up the stairwell, and I think you decided not</p> <p>24 to put your masks on at the beginning of your ascent.</p> <p>25 <b>A. Yes.</b></p> <p style="text-align: center;">Page 103</p>
<p>1 disabilities or anything of that nature?</p> <p>2 <b>A. No.</b></p> <p>3 Q. When you use the phrase "FSG", did you understand you</p> <p>4 were to try to search and rescue? Was that your</p> <p>5 understanding of your mission?</p> <p>6 <b>A. We weren't given those specific instructions, so that</b></p> <p>7 <b>wasn't my complete understanding. I think my</b></p> <p>8 <b>perspective was that me and Greg were to go up and</b></p> <p>9 <b>see -- make a sort of risk assessment from there and see</b></p> <p>10 <b>what we would do with what we found.</b></p> <p>11 Q. Given his relative seniority -- I think Mr Lawson was in</p> <p>12 the Brigade for 20 years or so -- would you have left it</p> <p>13 to Greg to assess whether a rescue was viable or not</p> <p>14 once you got there?</p> <p>15 <b>A. I definitely I think followed Greg, obviously on my lack</b></p> <p>16 <b>of experience, but I think we both sort of made</b></p> <p>17 <b>decisions together. It wasn't just I'm going to follow</b></p> <p>18 <b>what Greg says, I think. We're both very happy with our</b></p> <p>19 <b>decisions, so ...</b></p> <p>20 Q. Did you expect more detail in the briefing?</p> <p>21 <b>A. I think I would've done, yes.</b></p> <p>22 Q. Did you ask any further questions? You were given your</p> <p>23 instruction; did you ask any sort of supplemental</p> <p>24 questions to get more detail or not?</p> <p>25 <b>A. Not that I remember.</b></p> <p style="text-align: center;">Page 102</p>	<p>1 Q. One of the issues people are interested in is the fact</p> <p>2 that you didn't have your mask on, the fact that your</p> <p>3 cylinders were on, did it have any deleterious effect?</p> <p>4 Did it use up or conserve air?</p> <p>5 <b>A. No, our aim was to go up as far as we could in clean air</b></p> <p>6 <b>before we actually started breathing through our sets</b></p> <p>7 <b>just because we knew we had a long way to go, so we</b></p> <p>8 <b>didn't want to use air that we potentially might not</b></p> <p>9 <b>have needed to before we entered the smoky atmosphere.</b></p> <p>10 Q. Is it right that the ascent to the 18th floor took you</p> <p>11 about 5 to 10 minutes?</p> <p>12 <b>A. I think so. It could've been less, it could've been</b></p> <p>13 <b>more, it's just -- yeah.</b></p> <p>14 Q. Can you remember radio comms? Do you remember trying</p> <p>15 radio comms on the ascent up to the 18th floor?</p> <p>16 <b>A. I don't recall on the way up, no.</b></p> <p>17 Q. Do you remember hearing radio traffic as you went up?</p> <p>18 <b>A. No.</b></p> <p>19 Q. Okay.</p> <p>20 You got up to the 18th floor. What were the</p> <p>21 conditions like on the 18th-floor lobby, can you</p> <p>22 remember?</p> <p>23 <b>A. You couldn't see your hand in front of your face, so</b></p> <p>24 <b>thick, black smoke. In terms of the temperature,</b></p> <p>25 <b>I can't really remember how hot it was.</b></p> <p style="text-align: center;">Page 104</p>

<p>1 Q. As you get into the 18th-floor lobby, you describe in</p> <p>2 your statement visibility so poor that you had to get</p> <p>3 down on your knees -- is that right? -- to try and make</p> <p>4 out where the flats were.</p> <p>5 <b>A. Yes.</b></p> <p>6 Q. Is that a fair summary?</p> <p>7 <b>A. I think I remember the door numbers being quite low</b></p> <p>8 <b>down, so it was impossible to see them from standing,</b></p> <p>9 <b>but it was also quite difficult even getting that close.</b></p> <p>10 Q. At this point, Paul, could I ask you to bring up the</p> <p>11 exhibit to Ms Foster's statement, which is MET00015807.</p> <p>12 I think this is a hand-drawn plan you made of the</p> <p>13 18th floor, and you provide it as an exhibit to your</p> <p>14 witness statement.</p> <p>15 I think in your statement you describe, starting at</p> <p>16 the bottom left-hand corner of that plan, going round</p> <p>17 the flats 1, 2, 3, 4, 5 and 6 in that order.</p> <p>18 <b>A. Yes.</b></p> <p>19 Q. Now, you go to flat 1, which for the record is flat 151.</p> <p>20 What did you find there?</p> <p>21 <b>A. The door was locked and there was no answer.</b></p> <p>22 Q. Were you shouting as you went round each --</p> <p>23 <b>A. We were, yes, banging quite loud as well on the doors.</b></p> <p>24 Q. What were you shouting?</p> <p>25 <b>A. "Fire Brigade, come to the door", basically.</b></p> <p style="text-align: center;">Page 105</p>	<p>1 preventing smoke from the lobby penetrating into the</p> <p>2 flat?</p> <p>3 <b>A. I would say very effective.</b></p> <p>4 Q. Once you got into the flat, did you talk to any of the</p> <p>5 occupants?</p> <p>6 <b>A. We did.</b></p> <p>7 Q. No, you. Did you?</p> <p>8 <b>A. Both of us did, yes.</b></p> <p>9 Q. First of all, who did you talk to?</p> <p>10 <b>A. The adult.</b></p> <p>11 Q. What did you say?</p> <p>12 <b>A. I don't remember saying an awful lot, I think I remember</b></p> <p>13 <b>the lady asking us if they were going to die. So it was</b></p> <p>14 <b>just trying to reassure her for her children's sake.</b></p> <p>15 <b>That was all I really remember saying.</b></p> <p>16 Q. And did Greg talk to her?</p> <p>17 <b>A. He did, yes.</b></p> <p>18 Q. Can you remember what he said to her?</p> <p>19 <b>A. The only bit I really remember is about advice before we</b></p> <p>20 <b>went to leave the flat, which would've been to put</b></p> <p>21 <b>blankets along the door, and that was about it, really,</b></p> <p>22 <b>I think.</b></p> <p>23 Q. And that was the entirety of the conversation he had</p> <p>24 with her whilst in the flat, was it?</p> <p>25 <b>A. It was probably more because we went in and we were</b></p> <p style="text-align: center;">Page 107</p>
<p>1 Q. The next flat you went to is flat 2, which is flat 152.</p> <p>2 Am I right in saying that the occupant, a woman,</p> <p>3 answered the door and opened it?</p> <p>4 <b>A. She did, yes.</b></p> <p>5 Q. Who was closest to the flat entrance door, was it you or</p> <p>6 Greg?</p> <p>7 <b>A. I believe it was Greg.</b></p> <p>8 Q. Did she speak to Greg or to you or to both of you?</p> <p>9 <b>A. I can't remember.</b></p> <p>10 Q. Did you go into the flat?</p> <p>11 <b>A. Yes, we both entered the flat.</b></p> <p>12 Q. Can you describe for us the conditions within the flat?</p> <p>13 <b>A. Clean air. There were no signs of fire affecting the</b></p> <p>14 <b>flat, so it was completely different to the lobby area.</b></p> <p>15 Q. How many people did you see in the flat?</p> <p>16 <b>A. Four.</b></p> <p>17 Q. First of all, can you describe for us adults, children?</p> <p>18 <b>A. One adult, one female adult, and three children.</b></p> <p>19 Q. Could you see any internal doors within the flat?</p> <p>20 <b>A. I don't remember seeing any doors. It could be wrong,</b></p> <p>21 <b>but that was my recollection.</b></p> <p>22 Q. After you entered into flat 152, flat 2, did you close</p> <p>23 the flat entrance door?</p> <p>24 <b>A. We did, yes.</b></p> <p>25 Q. Can you remember now how effective that was at</p> <p style="text-align: center;">Page 106</p>	<p>1 <b>actually able to -- well, we took our masks off, just</b></p> <p>2 <b>because, again, we wanted to save as much air as we</b></p> <p>3 <b>could, so ...</b></p> <p>4 Q. You say in your witness statement at page 7, the top</p> <p>5 paragraph, the penultimate final lines -- probably</p> <p>6 useful if that is brought up for you. You mention there</p> <p>7 the advice given by Greg to put towels on the front door</p> <p>8 to stop smoke coming in, and then you and Greg left the</p> <p>9 flat; is that right?</p> <p>10 <b>A. Yes, that's correct.</b></p> <p>11 Q. As you left, did Greg say anything to the woman occupier</p> <p>12 of the flat?</p> <p>13 <b>A. Other than what I've put in my statement, I can't</b></p> <p>14 <b>remember.</b></p> <p>15 Q. Did you say anything before you left to her?</p> <p>16 <b>A. I don't remember.</b></p> <p>17 Q. Okay.</p> <p>18 You then left the flat. You say there:</p> <p>19 "The decision did make sense to me as the stairwell</p> <p>20 was full of smoke and the visibility was bad therefore</p> <p>21 it would have been impossible for us to get the family</p> <p>22 down the stairs without going unconscious. We also</p> <p>23 needed to see who else was on the 18th floor."</p> <p>24 Was that a thought you had at the time or is it</p> <p>25 a later thought you've had once you've been reflecting</p> <p style="text-align: center;">Page 108</p>

<p>1 on the events?</p> <p>2 <b>A. At the time.</b></p> <p>3 Q. Okay.</p> <p>4 Did either you or Greg clarify with the woman what</p> <p>5 the flat number was?</p> <p>6 <b>A. I don't remember, no.</b></p> <p>7 Q. Can you remember asking?</p> <p>8 <b>A. I don't remember asking myself, no.</b></p> <p>9 Q. You don't recall Greg asking?</p> <p>10 <b>A. No.</b></p> <p>11 Q. Okay.</p> <p>12 Did you or Greg tell the woman what you were going</p> <p>13 to do next after you left her?</p> <p>14 <b>A. I don't know if we said that we needed to check the</b></p> <p>15 <b>other flats, but other than that, I don't think so.</b></p> <p>16 Q. Did you say anything along the lines that the two of you</p> <p>17 would be back to take her down?</p> <p>18 <b>A. No.</b></p> <p>19 Q. What did you expect would happen to her whilst you were</p> <p>20 searching the other flats?</p> <p>21 <b>A. I think we could only really go on what information we</b></p> <p>22 <b>had at the time, because we entered the building when</b></p> <p>23 <b>only one side of the tower was alight, and the fact that</b></p> <p>24 <b>we'd come out of a smoke-filled lobby that you wouldn't</b></p> <p>25 <b>have been able to breathe in, her flat seemed to be the</b></p> <p style="text-align: center;">Page 109</p>	<p>1 <b>A. I think it was probably roughly about right, just</b></p> <p>2 <b>because I think smoke could've started pouring into the</b></p> <p>3 <b>flat by -- if it was too long of a conversation, so ...</b></p> <p>4 Q. And it was Greg who was talking to the male occupant of</p> <p>5 flat 3, was it?</p> <p>6 <b>A. Yes, that's correct.</b></p> <p>7 Q. Where were you standing in relation to Greg?</p> <p>8 <b>A. I think just behind his sort of left-hand side.</b></p> <p>9 Q. What were the smoke conditions like in the lobby at that</p> <p>10 stage?</p> <p>11 <b>A. The same as before, so thick, black smoke and very, very</b></p> <p>12 <b>poor visibility.</b></p> <p>13 Q. Could you see the gentleman who opened the door?</p> <p>14 <b>A. Yes, just because there was light coming from the door</b></p> <p>15 <b>and I could see him sort of where he'd poked his head</b></p> <p>16 <b>round the corner.</b></p> <p>17 Q. How far did he open the door? Was it inched open or</p> <p>18 broader than that?</p> <p>19 <b>A. I would probably say about that far (Indicates). So</b></p> <p>20 <b>not -- from my recollection, so not very far.</b></p> <p>21 Q. Do you think he would've been able to see you from where</p> <p>22 he was standing?</p> <p>23 <b>A. Probably not.</b></p> <p>24 Q. Okay.</p> <p>25 And it's right that you never went into flat 3?</p> <p style="text-align: center;">Page 111</p>
<p>1 <b>safest place to leave them for the time being.</b></p> <p>2 Q. Did Firefighter Lawson say that you would both come back</p> <p>3 and check on her after you'd checked the other flats?</p> <p>4 <b>A. I don't recall.</b></p> <p>5 Q. You did go back, though, to check on her before you</p> <p>6 left --</p> <p>7 <b>A. I --</b></p> <p>8 Q. -- floor 18, didn't you?</p> <p>9 <b>A. I don't recall that either.</b></p> <p>10 Q. Okay.</p> <p>11 You left flat 2 and then you went to flat 3; is that</p> <p>12 right?</p> <p>13 <b>A. Yes, that's right.</b></p> <p>14 Q. What did you find there?</p> <p>15 <b>A. Greg was in front of me, but a gentleman opened the</b></p> <p>16 <b>door, where he poked his head round, and we asked how</b></p> <p>17 <b>many people would be in the flat, to which he replied</b></p> <p>18 <b>there was five. It was a very quick conversation, from</b></p> <p>19 <b>what I remember, and it was the same guidance sort of</b></p> <p>20 <b>from the previous flat, just to keep blankets by the</b></p> <p>21 <b>doors, if possible.</b></p> <p>22 Q. It's always difficult estimating time. I think in the</p> <p>23 statement it has been referred to 20 seconds or so. Do</p> <p>24 you think it was shorter, longer, how long do you think</p> <p>25 the conversation took place?</p> <p style="text-align: center;">Page 110</p>	<p>1 <b>A. No, we didn't.</b></p> <p>2 Q. Could you see what conditions were like in the flat,</p> <p>3 other than seeing the backlight?</p> <p>4 <b>A. Personally, no, I couldn't.</b></p> <p>5 Q. Did Greg ask how many adults and how many children were</p> <p>6 within that five?</p> <p>7 <b>A. I don't recall that question, no.</b></p> <p>8 Q. Would that type of information have assisted later</p> <p>9 search and rescue efforts if you were unable to take the</p> <p>10 family of five down?</p> <p>11 <b>A. I'm not really sure on that one, actually.</b></p> <p>12 Q. Why are you uncertain?</p> <p>13 <b>A. I don't know. I think just knowing that there were five</b></p> <p>14 <b>people would be enough information for them, but it</b></p> <p>15 <b>could've helped knowing that there were children in</b></p> <p>16 <b>there, so ...</b></p> <p>17 Q. Do you remember whether Greg clarified the precise flat</p> <p>18 number with the gentleman?</p> <p>19 <b>A. No, I don't.</b></p> <p>20 Q. Now, I think you're right in saying the next flat you</p> <p>21 looked at was flat 4, which had an open door. Was it</p> <p>22 physically open or was it just simply unlocked, closed</p> <p>23 but unlocked; can you remember?</p> <p>24 <b>A. I think it was open.</b></p> <p>25 Q. When you looked in, I think it's fair to describe your</p> <p style="text-align: center;">Page 112</p>

<p>1 evidence, it was pitch black, full of smoke?</p> <p>2 <b>A. Yes.</b></p> <p>3 Q. And you carried out a sweep?</p> <p>4 <b>A. Me and Greg searched the flat, yes.</b></p> <p>5 Q. Can you explain to us the method you used in searching</p> <p>6 flat 4?</p> <p>7 <b>A. It's not --</b></p> <p>8 Q. Did you go in --</p> <p>9 <b>A. -- really supposed to happen, but we both went in and we</b></p> <p>10 <b>both decided it would be quicker to search if we split</b></p> <p>11 <b>up. So I think I went on the left-hand and Greg went on</b></p> <p>12 <b>the right-hand wall, and then we would meet and then</b></p> <p>13 <b>decide whether we thought it was empty.</b></p> <p>14 Q. And you both confirmed there was no one in there?</p> <p>15 <b>A. Yes.</b></p> <p>16 Q. You went to the next flat, which is flat 5. Again, the</p> <p>17 door was open; is that right?</p> <p>18 <b>A. Yes.</b></p> <p>19 Q. Was it physically open or was it simply closed and</p> <p>20 unlocked?</p> <p>21 <b>A. I think physically open just because of the amount of</b></p> <p>22 <b>smoke that was in the flat.</b></p> <p>23 Q. Again, the conditions were similar to those you'd</p> <p>24 encountered in flat 4; is that right?</p> <p>25 <b>A. Yes.</b></p> <p style="text-align: center;">Page 113</p>	<p>1 <b>I think we both knew that it was not practical to take</b></p> <p>2 <b>nine people down -- even one person, just because of the</b></p> <p>3 <b>conditions and the knowledge that we had. We weren't</b></p> <p>4 <b>aware that the whole building was alight while we were</b></p> <p>5 <b>in there, so we had to go on the information we had.</b></p> <p>6 Q. When you were trying to radio down, is it right that you</p> <p>7 used both channels 1 and 6?</p> <p>8 <b>A. Yes.</b></p> <p>9 Q. One query that's arisen is: would it have been possible</p> <p>10 to have gone back to flats 2 or 3 and asked to use their</p> <p>11 mobile phones? Even if you had had access to those</p> <p>12 phones, would you have been able to contact the</p> <p>13 bridgehead or anyone at the bridgehead using those</p> <p>14 phones?</p> <p>15 <b>A. Not at the bridgehead because we wouldn't have contact</b></p> <p>16 <b>details for those people.</b></p> <p>17 Q. Once you'd carried out the search of the six flats on</p> <p>18 the 18th floor, is it right that your BA bar was getting</p> <p>19 lower?</p> <p>20 <b>A. It was, yes.</b></p> <p>21 Q. The limited amount of air that you had left, was that</p> <p>22 a factor in your decision to return to the bridgehead?</p> <p>23 <b>A. Yes, it was.</b></p> <p>24 Q. Was there a discussion about leading the occupants of</p> <p>25 flats 2 and 3 down in a snake line --</p> <p style="text-align: center;">Page 115</p>
<p>1 Q. Finally, you came to flat 6. The door was closed; is</p> <p>2 that right?</p> <p>3 <b>A. It is, yes.</b></p> <p>4 Q. In your statement, you state that you experienced</p> <p>5 an increased heat --</p> <p>6 <b>A. Yes.</b></p> <p>7 Q. -- standing by the door.</p> <p>8 Was it apparent from that experience that there was</p> <p>9 a full-blown fire engaged in flat 6 or not?</p> <p>10 <b>A. That's what I expected, yeah.</b></p> <p>11 Q. I forgot to ask earlier, did you have a thermal imaging</p> <p>12 camera with you?</p> <p>13 <b>A. We didn't, no.</b></p> <p>14 Q. Once you finished searching flats 4 and 5 where there</p> <p>15 were open doors, did you close the doors behind you?</p> <p>16 <b>A. I don't remember.</b></p> <p>17 Q. Okay.</p> <p>18 At that stage, once you'd completed the circuit of</p> <p>19 all six flats, did you discuss whether it was</p> <p>20 practicable to evacuate the residents in flat 2 and 3?</p> <p>21 <b>A. I recall that we came back to the stairwell and then</b></p> <p>22 <b>began to try and radio down to the bridgehead, to which</b></p> <p>23 <b>we were unsuccessful on numerous occasions.</b></p> <p>24 Q. I think in your statement you say seven times.</p> <p>25 <b>A. It was quite a few times, yes. And I think we just --</b></p> <p style="text-align: center;">Page 114</p>	<p>1 <b>A. No.</b></p> <p>2 Q. -- with Mr Lawson? Are you sure about that?</p> <p>3 <b>A. Not that I -- no, I don't recall that.</b></p> <p>4 Q. Did you discuss whether there were any other</p> <p>5 firefighters coming up the stair who could help take</p> <p>6 down the occupants of flats 2 and 3 on that floor?</p> <p>7 <b>A. I don't recall having a conversation about that, no.</b></p> <p>8 Q. We covered this earlier, but just to put the point</p> <p>9 squarely, did you go back and tell the families in</p> <p>10 flats 2 and 3 what you were planning on doing or what</p> <p>11 they should expect?</p> <p>12 <b>A. I personally don't remember going back to the flats at</b></p> <p>13 <b>all, no.</b></p> <p>14 Q. The conditions on the way down, I think you describe</p> <p>15 visibility as bad and that you were sweeping the floor</p> <p>16 and leaning on your back foot to avoid falling. Is that</p> <p>17 a fair summary?</p> <p>18 <b>A. It is, yes.</b></p> <p>19 Q. You say that you heard children screaming at about the</p> <p>20 12th floor and you turned back to see whether you could</p> <p>21 find them?</p> <p>22 <b>A. Yes.</b></p> <p>23 Q. Could you find anyone?</p> <p>24 <b>A. No, we weren't able to. I think we went up another</b></p> <p>25 <b>floor and by that point the screaming had stopped. And,</b></p> <p style="text-align: center;">Page 116</p>

<p>1 again, our cylinders were getting quite low, so we made</p> <p>2 the decision to turn around.</p> <p>3 Q. When you went back, following the voices, as it were,</p> <p>4 did you go from the stairwell into the lobby around the</p> <p>5 12th floor? Did you go that far to see whether you</p> <p>6 could hear where the sounds were coming from?</p> <p>7 A. I didn't personally. I'm not sure whether Greg did</p> <p>8 because he was in front of me when we turned back round.</p> <p>9 Q. Okay.</p> <p>10 You describe in your witness statement that the back</p> <p>11 of your neck felt like it was burning. Did that burning</p> <p>12 sensation start around the 5th floor, as you indicate in</p> <p>13 your statement, or did it start higher up, can you</p> <p>14 remember now?</p> <p>15 A. I think it was about the 5th floor. It could've been</p> <p>16 higher, but my sense of my surroundings weren't great,</p> <p>17 so ...</p> <p>18 Q. On your way down, is it right that you saw a woman in</p> <p>19 a Burka headscarf with a cloth over her face being</p> <p>20 carried out?</p> <p>21 A. Yes.</p> <p>22 Q. Can you remember where you saw her? I'm mindful of the</p> <p>23 answer you've just given.</p> <p>24 A. I think it was the 4th or 5th, maybe just around there,</p> <p>25 because I know there was a bit of a queue to come out of</p> <p style="text-align: center;">Page 117</p>	<p>1 a map on the wall.</p> <p>2 Q. Before you were sent off to do other things, can you</p> <p>3 remember what Greg said to the officer about what he'd</p> <p>4 encountered on the 18th floor?</p> <p>5 A. I think we said that we'd come from the 18th floor, but</p> <p>6 then by that point he'd asked me to go and close down.</p> <p>7 Q. Did you see Firefighter Lawson draw on the wall the</p> <p>8 information relating to the flats on the 18th floor?</p> <p>9 A. No, not personally.</p> <p>10 Q. Did you know that's what he'd done later on?</p> <p>11 A. Yes.</p> <p>12 Q. Did he tell you?</p> <p>13 A. Yes, he did.</p> <p>14 Q. Did he tell you what he'd written, the information that</p> <p>15 he'd written?</p> <p>16 A. I think just a rough floor plan and how many people we'd</p> <p>17 found in each flat.</p> <p>18 Q. Did you see what he'd written on the wall?</p> <p>19 A. No.</p> <p>20 Q. Okay.</p> <p>21 If I can now talk about various matters relating to</p> <p>22 after you'd come down out of the tower.</p> <p>23 After you'd left the bridgehead, did you know what</p> <p>24 steps were being taken to go back to the 18th floor, to</p> <p>25 deploy fresh crews? Were you aware of what steps were</p> <p style="text-align: center;">Page 119</p>
<p>1 the building. There was quite a lot of firefighters</p> <p>2 trying to get out.</p> <p>3 Q. Now, you've got back to the bridgehead. Was the</p> <p>4 bridgehead on the 3rd floor at this stage, can you</p> <p>5 remember?</p> <p>6 A. From what I remember.</p> <p>7 Q. And the LFB docs indicate that you tallied back in at</p> <p>8 02.28. I think that sounds about right from what you</p> <p>9 said earlier on.</p> <p>10 A. (Nodded assent).</p> <p>11 Q. Can you describe the conditions, the situation at the</p> <p>12 bridgehead when you got back down there?</p> <p>13 A. As in visibility or smoke or just --</p> <p>14 Q. Fair point. You describe it in your statement as being</p> <p>15 like mayhem.</p> <p>16 A. It was, yeah, there was just people everywhere, and</p> <p>17 I think by that point there were more BA boards and</p> <p>18 I wasn't really sure where my tally was, so trying to</p> <p>19 find that was a bit hectic.</p> <p>20 Q. Who debriefed the officer at the bridgehead? Was it you</p> <p>21 or Greg, or did you both do it?</p> <p>22 A. As we came down, we were met by an officer in a white</p> <p>23 helmet, I don't know their name, and as we were</p> <p>24 beginning to debrief, he said for me to just go and get</p> <p>25 my tally and close down, and Greg stayed there to draw</p> <p style="text-align: center;">Page 118</p>	<p>1 taken?</p> <p>2 A. As in did anybody go back?</p> <p>3 Q. Yes. Or were you aware --</p> <p>4 A. I wasn't aware, no.</p> <p>5 Q. Okay.</p> <p>6 Did you go back to the bridgehead when it was on the</p> <p>7 ground floor later in the evening?</p> <p>8 A. I didn't return back into the tower after I left from</p> <p>9 that particular wear.</p> <p>10 Q. In your contemporaneous notes, you refer to an EDBA crew</p> <p>11 which you passed before deploying to the 18th floor.</p> <p>12 Do you think larger crews, ie a crew of four of EDBA</p> <p>13 wearers, would have assisted rescue efforts,</p> <p>14 particularly in relation to the 18th floor?</p> <p>15 A. It could've done, but then again I think it would've</p> <p>16 been on those particular firefighters' decision as to</p> <p>17 what they would do as well, whether they thought it</p> <p>18 would be safe enough to take them out of their flats,</p> <p>19 so ...</p> <p>20 Q. I hope you don't mind, given you're a probationer or</p> <p>21 were at the time, if I ask a brief question about</p> <p>22 training.</p> <p>23 A. Mm-hm.</p> <p>24 Q. In page 5 of your witness statement, you explain that</p> <p>25 you only had limited training on FSG as the training</p> <p style="text-align: center;">Page 120</p>

<p>1 course is not as long as it used to be. 2 Do you know how long the course used to be? 3 <b>A. 17 weeks, I believe.</b> 4 Q. How long in terms of days or hours did you get on FSG as 5 part of your course? 6 <b>A. Probably not very long, I think, from my memory.</b> 7 <b>I think it was just a sort of -- not a quick</b> 8 <b>conversation, but it's -- because it's mostly dealt</b> 9 <b>by -- from control, it's not something that we had a lot</b> 10 <b>of training in.</b> 11 Q. At page 6 of your witness statement, you say that you 12 and Firefighter Lawson didn't have any breaking-in gear. 13 I'm mindful you're a probationer of six weeks' standing 14 at the time, but did your training indicate that you 15 would normally carry breaking-in gear on briefs such as 16 this? 17 <b>A. I know it's -- for when you set up a bridgehead, you</b> 18 <b>take certain items of equipment and breaking-in gear is</b> 19 <b>one of those. I guess, yeah, it would've helped in our</b> 20 <b>task.</b> 21 Q. How would it have helped? 22 <b>A. To gain entry to the flats that we came across that were</b> 23 <b>locked.</b> 24 Q. Do you know why you didn't have breaking-in gear with 25 you?</p> <p style="text-align: center;">Page 121</p>	<p>1 MR KINNIER: Thank you, sir. 2 (12.55 pm) 3 (A short break) 4 (1.00 pm) 5 MR KINNIER: Just a few supplementals. 6 SIR MARTIN MOORE-BICK: Yes, Mr Kinnier. 7 (The witness returned) 8 SIR MARTIN MOORE-BICK: I think there are a few more 9 questions, Ms Foster. 10 THE WITNESS: Okay. 11 MR KINNIER: Thanks very much for your patience. 12 First of all, can I ask questions in relation to 13 flat 2. 14 <b>A. Yes.</b> 15 Q. Now, you were aware, as I understand it, that there were 16 children within the flat; is that right? 17 <b>A. Yes.</b> 18 Q. Did you discuss with Greg whether because there were 19 children within the flat, their evacuation ought to have 20 been prioritised? 21 <b>A. I don't recall having that conversation, no.</b> 22 Q. Did Mr Lawson raise it? 23 <b>A. I don't remember, no.</b> 24 Q. At that stage, would it have been practicable to have 25 evacuated the two children as a matter of priority?</p> <p style="text-align: center;">Page 123</p>
<p>1 <b>A. I think myself and my colleagues from Willesden took</b> 2 <b>certain amounts of equipment to the bridgehead and</b> 3 <b>I think we just -- we then took bits of that and we</b> 4 <b>didn't have any of the breaking-in gear with us</b> 5 <b>particularly.</b> 6 MR KINNIER: Ms Foster, I'm really grateful for your help. 7 Sir, may we have a standard 5-minute break, slightly 8 intrude into the lunch hour and then maybe adjourn 9 slightly later for lunchtime? 10 SIR MARTIN MOORE-BICK: I'm sure Ms Foster would like to 11 finish her evidence before lunch if she can, so we'll 12 break for 5 minutes and give Mr Kinnier a chance to 13 decide whether there are further questions he needs to 14 ask, and then we'll come back at 1 o'clock -- 15 THE WITNESS: Yes. 16 SIR MARTIN MOORE-BICK: -- and take whatever else needs to 17 be done. Is that all right? 18 THE WITNESS: Yes. 19 SIR MARTIN MOORE-BICK: Please don't talk to anyone about 20 your evidence while you're out of the room. All right? 21 THE WITNESS: Yes. 22 SIR MARTIN MOORE-BICK: If you would like to go with the 23 usher, please. 24 (The witness withdrew) 25 SIR MARTIN MOORE-BICK: Right, we'll resume at 1 o'clock.</p> <p style="text-align: center;">Page 122</p>	<p>1 <b>A. From the conditions in the stairwell, I wouldn't have</b> 2 <b>deemed it as safe to take anybody out, so no.</b> 3 Q. At that stage, can you remember how much air you had 4 left in terms of the percentage of the cylinder content, 5 can you remember? 6 <b>A. I don't remember, I just remember that Greg had less</b> 7 <b>than me. But I can't remember how much, no.</b> 8 Q. When you left the occupants and their children within 9 that flat, what was your plan? What were you going to 10 do in relation to them? What were your intentions? 11 <b>A. We wanted to search the rest of the floor, just to be</b> 12 <b>aware of how many people were there. We didn't make</b> 13 <b>a specific plan for that flat.</b> 14 Q. Did you think or assume that a separate crew would come 15 back and rescue them? 16 <b>A. That was my thinking, yes.</b> 17 Q. Given the conditions you encountered on the stairwell 18 going up, given the conditions you encountered on the 19 18th-floor lobby itself, and given where they were 20 located, ie on the 18th floor, if they were to be 21 rescued later, would they still not have encountered 22 smoke and difficulties, if not greater difficulties? 23 <b>A. I think there were times in the stairwell where the</b> 24 <b>smoke seemed to clear, so that would've been a more</b> 25 <b>appropriate time, not that anybody would know when that</b></p> <p style="text-align: center;">Page 124</p>

<p>1 <b>was to happen.</b></p> <p>2 Q. Flowing from that, whilst you were on the 18th-floor</p> <p>3 lobby, did the smoke conditions deteriorate, improve or</p> <p>4 remain constant?</p> <p>5 <b>A. Remained constant.</b></p> <p>6 Q. Okay.</p> <p>7 Given the conditions you experienced on the 18th</p> <p>8 floor, were you concerned about rapid fire spread or</p> <p>9 smoke spread to flats 2 and 3?</p> <p>10 <b>A. Not at the time. I think leaving the building and</b></p> <p>11 <b>turning around to look up at it and realising that the</b></p> <p>12 <b>whole building was alight, I was quite concerned after</b></p> <p>13 <b>that.</b></p> <p>14 Q. Sorry, I didn't catch the last bit. There is competing</p> <p>15 external noise.</p> <p>16 <b>A. When I turned around to look back up at the building,</b></p> <p>17 <b>I obviously wasn't aware at the time when I was in there</b></p> <p>18 <b>what was going on, so when I turned around and saw that</b></p> <p>19 <b>it was all alight, that then became a bit of a worry for</b></p> <p>20 <b>me.</b></p> <p>21 Q. What made you believe that you would have enough time to</p> <p>22 get down, report and debrief to the bridgehead, and then</p> <p>23 for another team to get up to the 18th floor before</p> <p>24 smoke or fire overwhelmed flat 152, so flat 2? What</p> <p>25 made you think there was enough time for all that to be</p> <p style="text-align: right;">Page 125</p>	<p>1 Q. Do you remember him saying that he had two children with</p> <p>2 him in the flat?</p> <p>3 <b>A. I don't remember that, no.</b></p> <p>4 Q. Do you remember him saying he wanted to get out?</p> <p>5 <b>A. I don't remember that myself, no.</b></p> <p>6 Q. Do you remember Greg saying that the fire was on the</p> <p>7 other side of the building and he wasn't to worry?</p> <p>8 <b>A. I don't recall that, no.</b></p> <p>9 Q. Okay.</p> <p>10 Do you remember him asking Greg the question "How</p> <p>11 long will it take you to get me out"?</p> <p>12 <b>A. No, I don't recall that, sorry.</b></p> <p>13 Q. Is it that you don't recall it, or it didn't happen, can</p> <p>14 you be more certain?</p> <p>15 <b>A. I can't say whether it did or didn't happen, so I don't</b></p> <p>16 <b>know. It's a tough one because I was behind Greg and</b></p> <p>17 <b>not actually having that conversation myself. That</b></p> <p>18 <b>wouldn't be something I would be able to answer. But</b></p> <p>19 <b>I didn't hear it, so ...</b></p> <p>20 Q. Can you remember -- apologies, this is maybe</p> <p>21 a lawyer-type question -- how long the exchange lasted</p> <p>22 between Greg and the gentleman who lived within flat 3?</p> <p>23 <b>A. I think, like I said in my statement, it was quite</b></p> <p>24 <b>brief, so maybe 20 to 30 seconds, but that's just my</b></p> <p>25 <b>memory.</b></p> <p style="text-align: right;">Page 127</p>
<p>1 avoided and get people out?</p> <p>2 <b>A. Like I said, we were going on what we knew and we</b></p> <p>3 <b>weren't aware of any changing conditions ourselves</b></p> <p>4 <b>because of lack of radio communications, and not</b></p> <p>5 <b>physically being able to see ourselves, so we weren't</b></p> <p>6 <b>actually aware of what had actually happened outside.</b></p> <p>7 Q. Is it fair to summarise your evidence this way: you</p> <p>8 assumed that the lady and her children would be safer</p> <p>9 within the flat than trying to get them out?</p> <p>10 <b>A. Yes, that's correct.</b></p> <p>11 Q. And for the reasons you gave earlier?</p> <p>12 <b>A. Yes, that's correct.</b></p> <p>13 Q. Now, can I ask you a final set of questions, and that's</p> <p>14 in relation to flat 3.</p> <p>15 Did you get a sense when you were overhearing the</p> <p>16 conversation between the man and Greg that English was</p> <p>17 his first language?</p> <p>18 <b>A. Yes.</b></p> <p>19 Q. He explained himself clearly and understandably?</p> <p>20 <b>A. From what I could hear, yes.</b></p> <p>21 Q. Did you get the impression that he wanted to talk to you</p> <p>22 and Greg to explain what his situation was?</p> <p>23 <b>A. I'm not really sure.</b></p> <p>24 Q. Do you remember him asking for your help?</p> <p>25 <b>A. I don't remember that, no.</b></p> <p style="text-align: right;">Page 126</p>	<p>1 MR KINNIER: Ms Foster, thank you very much for the evidence</p> <p>2 you've given today. Your help has been much</p> <p>3 appreciated. Those are all the questions I have for</p> <p>4 you.</p> <p>5 SIR MARTIN MOORE-BICK: Thank you very much for coming to</p> <p>6 give your evidence, it's very helpful. I hope it hasn't</p> <p>7 been too difficult.</p> <p>8 Thank you very much, you're free to go. Would you</p> <p>9 like to go with the usher, thank you.</p> <p>10 (The witness was released)</p> <p>11 SIR MARTIN MOORE-BICK: Well, that's a convenient point,</p> <p>12 Mr Kinnier.</p> <p>13 MR KINNIER: It is, sir. Might I invite you to return at</p> <p>14 2.10 and then we can commence with Firefighter Gregory</p> <p>15 Lawson.</p> <p>16 SIR MARTIN MOORE-BICK: Yes. 2.10, then, please, thank you.</p> <p>17 (1.10 pm)</p> <p>18 (The short adjournment)</p> <p>19 (2.10 pm)</p> <p>20 SIR MARTIN MOORE-BICK: Yes, Mr Kinnier.</p> <p>21 MR KINNIER: Afternoon, sir. May I call Gregory Lawson.</p> <p>22 SIR MARTIN MOORE-BICK: Thank you.</p> <p>23 GREGORY LAWSON (affirmed)</p> <p>24 Questions by MR KINNIER</p> <p>25 SIR MARTIN MOORE-BICK: Thank you very much. Sit down and</p> <p style="text-align: right;">Page 128</p>



<p>1 make yourself comfortable.</p> <p>2 Yes, Mr Kinnier.</p> <p>3 MR KINNIER: Thank you, sir.</p> <p>4 First of all, would you mind confirming your name</p> <p>5 for the record?</p> <p>6 <b>A. Yes, Gregory Lawson.</b></p> <p>7 Q. Good afternoon. Thank you very much for attending today</p> <p>8 to give evidence.</p> <p>9 In the blue folder in front of you, if you turn to</p> <p>10 the first tab, behind that should be your statement</p> <p>11 dated 7 December 2017; is that right?</p> <p>12 <b>A. That's correct, yes.</b></p> <p>13 Q. If you go to the next tab, you should find your</p> <p>14 contemporaneous notes; is that right?</p> <p>15 <b>A. That is that, yes.</b></p> <p>16 Q. If you turn to the final tab, you should find three</p> <p>17 exhibits which were attached to the back of your witness</p> <p>18 statement which are various plans.</p> <p>19 <b>A. Yes, that's correct.</b></p> <p>20 Q. Have you read those documents recently?</p> <p>21 <b>A. I have, yes.</b></p> <p>22 Q. Do you confirm their contents are true?</p> <p>23 <b>A. I do.</b></p> <p>24 Q. Are you content for those documents to stand as your</p> <p>25 evidence to the inquiry?</p> <p style="text-align: right;">Page 129</p>	<p>1 <b>A. Watch Manager Cardy.</b></p> <p>2 Q. Watch manager, to repeat the offence I made earlier on.</p> <p>3 Watch Manager Cardy and Firefighter Tom Welch --</p> <p>4 <b>A. Yes.</b></p> <p>5 Q. -- and Crew Manager Eden.</p> <p>6 <b>A. That's correct.</b></p> <p>7 Q. Now, as to timings, the LFB have provided records which</p> <p>8 indicate that you mobilised at 01.26, were mobile at</p> <p>9 01.28 and you'd arrived at the scene at 01.40. Does</p> <p>10 that sound about right?</p> <p>11 <b>A. Sounds about right to me, yes.</b></p> <p>12 Q. In relation to SDBA wear, again, the LFB has provided us</p> <p>13 with records as to timings. They indicate that the SDBA</p> <p>14 was disconnected from your appliance at 01.42, switched</p> <p>15 on at 01.52, and you tallied out at the bridgehead at</p> <p>16 01.53. Do those times sound about right to you?</p> <p>17 <b>A. Can you say the second one again?</b></p> <p>18 Q. Of course. The SDBA was switched on at 01.52.</p> <p>19 <b>A. Okay, yes.</b></p> <p>20 Q. Yes.</p> <p>21 The first matter I'd like to talk to you about is</p> <p>22 your time at entry control.</p> <p>23 Now, on arrival at the bridgehead, did you enter the</p> <p>24 tower with Foster, Cardy and Welch?</p> <p>25 <b>A. I wasn't aware who was behind me. I know that we all</b></p> <p style="text-align: right;">Page 131</p>
<p>1 <b>A. I do.</b></p> <p>2 Q. Thank you.</p> <p>3 Mr Lawson, as you've heard me say to others, if at</p> <p>4 any stage you want a break, please shout. If any of my</p> <p>5 questions are unclear, please say so and I'll rephrase</p> <p>6 them.</p> <p>7 <b>A. Okay.</b></p> <p>8 Q. Just so you know, the focus of my questions today will</p> <p>9 be on the FSG mission you were tasked to complete in</p> <p>10 relation to the 18th floor.</p> <p>11 <b>A. Yes.</b></p> <p>12 Q. Before we get on to that, could I ask you some basic</p> <p>13 questions to get some context.</p> <p>14 First of all, at the time of the fire, is it right</p> <p>15 you'd been a firefighter for 20 years?</p> <p>16 <b>A. Just over, yes -- sorry, just short of.</b></p> <p>17 Q. And you were based at Willesden on the Red Watch?</p> <p>18 <b>A. That's correct.</b></p> <p>19 Q. That you were the driver of the appliance Golf 281?</p> <p>20 <b>A. Yes, that's right.</b></p> <p>21 Q. And Firefighter Katie Foster was your BA partner on the</p> <p>22 FSG task to floor 18?</p> <p>23 <b>A. That's correct, yes.</b></p> <p>24 Q. The other members of your crew were Crew Manager</p> <p>25 Cardy --</p> <p style="text-align: right;">Page 130</p>	<p>1 <b>went back to the truck to get our BA sets on arrival and</b></p> <p>2 <b>pick up hose and breaking-in gear and made our way back</b></p> <p>3 <b>to the tower. I walked in with Kate and I'm sure that</b></p> <p>4 <b>Tom and Crew Manager Eden were behind me.</b></p> <p>5 Q. If I could ask you to turn to page 2 of your witness</p> <p>6 statement and the third substantive paragraph there,</p> <p>7 line 2, you say:</p> <p>8 "We went up to the bridgehead on the 3rd floor where</p> <p>9 we were briefed and told to go the 18th floor, FSG calls</p> <p>10 were in place on that floor. Protocol wise at the</p> <p>11 bridgehead things were not working as you would expect</p> <p>12 them to do normally, there were an awful lot of people</p> <p>13 standing around, there was dozens of crews waiting to go</p> <p>14 up the building ..."</p> <p>15 You say protocol-wise things were not working as</p> <p>16 normal. Can you explain?</p> <p>17 <b>A. Yes. So, for us, the bridgehead and BA entry control is</b></p> <p>18 <b>quite a formal and ordered procession for firefighters.</b></p> <p>19 <b>There seemed to be quite a lot of people talking around</b></p> <p>20 <b>us, a lot of people waiting to go into the building, and</b></p> <p>21 <b>it seemed to be quite sporadic how people were called</b></p> <p>22 <b>forward.</b></p> <p>23 Q. Did you have any sense of any priorities that had been</p> <p>24 identified?</p> <p>25 <b>A. No. We were aware people were making FSG calls inside</b></p> <p style="text-align: right;">Page 132</p>

<p>1 the building. We weren't sure entirely how many or</p> <p>2 where they were placed. And the briefings basically</p> <p>3 were, as it says there, to go to the 18th floor. That</p> <p>4 is pretty much our briefing.</p> <p>5 Q. In respect of that instruction, can you remember who</p> <p>6 gave you the instruction?</p> <p>7 A. I think, as far as I'm aware, I can remember -- I don't</p> <p>8 know if he gave me the instruction or not, but at the</p> <p>9 bridgehead at the time was Station Officer O'Keeffe.</p> <p>10 Q. It appears from what you say in your statement the</p> <p>11 detail you were given was to go to the 18th floor, FSG</p> <p>12 calls were in place. Was that it?</p> <p>13 A. That's pretty much it, yes.</p> <p>14 Q. So no detail about conditions in the stairwell?</p> <p>15 A. No conditions about a number of casualties, conditions</p> <p>16 or anything else other than the 18th floor.</p> <p>17 Q. Just for the avoidance of doubt, no detail regarding</p> <p>18 number of adults, number of children?</p> <p>19 A. No.</p> <p>20 Q. Or disabilities, vulnerabilities?</p> <p>21 A. No, nothing like that at all.</p> <p>22 Q. Now, by using the phrase "FSG", do you understand that</p> <p>23 to mean to try and search and rescue?</p> <p>24 A. Fire survival guidance is the phone call in place. The</p> <p>25 directive of that is the control staff have the guidance</p> <p style="text-align: center;">Page 133</p>	<p>1 and you just carry on on instinct, really.</p> <p>2 Q. Did you think whether to suggest to Watch Manager</p> <p>3 O'Keeffe that, given it was the 18th floor, it might</p> <p>4 have been more appropriate for an EDBA deployment?</p> <p>5 A. I wouldn't have questioned it. Normally, if I think</p> <p>6 I had more time and it wasn't as severe a situation,</p> <p>7 I might have done, but at that time it was about getting</p> <p>8 in and doing what we could.</p> <p>9 Q. One point raised is whether it would have been better,</p> <p>10 ie it would've enabled you to effect more rescues, had</p> <p>11 you gone up in crews of four. What would be your view</p> <p>12 on that?</p> <p>13 A. If you're talking purely in hindsight, in hindsight, in</p> <p>14 the situation I found myself in, more firefighters were</p> <p>15 what I needed, yes.</p> <p>16 Q. Can you explain to us what the advantages would've been,</p> <p>17 so we understand more fully?</p> <p>18 A. So in the situation we found ourselves in, myself and</p> <p>19 Kate, we were faced with nine casualties on the 18th</p> <p>20 floor with an irrespirable atmosphere and a long way to</p> <p>21 go. We tried our best to try and secure other BA crews</p> <p>22 to help us and assist us in our task. It would have</p> <p>23 been -- we were unable as two people to rescue nine, it</p> <p>24 was beyond us humanly. We need more people. So more</p> <p>25 people would have given us more opportunity to rescue</p> <p style="text-align: center;">Page 135</p>
<p>1 (inaudible) to keep them safe inside their house until</p> <p>2 we can reach them and make a decision.</p> <p>3 Q. Looking at the instruction you were given, was the level</p> <p>4 of detail sufficient for your purposes?</p> <p>5 A. It got us to where we needed to go, we knew we had to</p> <p>6 get to. It didn't prepare us for what we found on the</p> <p>7 18th floor.</p> <p>8 Q. Did you ask Watch Manager O'Keeffe whether there was any</p> <p>9 other detail he had for you?</p> <p>10 A. There really wasn't time for that. As we were getting</p> <p>11 called through, so were other crews, and there was just</p> <p>12 a lot of information being passed, a lot of people at</p> <p>13 exactly the same time.</p> <p>14 Q. Staying on page 2 of your witness statement, the third</p> <p>15 substantive paragraph, three lines from the bottom, you</p> <p>16 say this:</p> <p>17 "... we were initially a little bit worried about</p> <p>18 the 18th floor remit considering we were standing next</p> <p>19 to people with EDBA on, extended duration breathing</p> <p>20 apparatus, we only had standard duration."</p> <p>21 Now, you say there "initially". This suggests that</p> <p>22 later on you were unworried about not having EDBA.</p> <p>23 A. No, it means that when you have the opportunity to think</p> <p>24 about something, it can cause you to have doubts, but</p> <p>25 once you're in action, the doubts tend to reside away</p> <p style="text-align: center;">Page 134</p>	<p>1 more people.</p> <p>2 Q. One question we asked earlier on today was whether</p> <p>3 a firefighter would ever automatically carry a second BA</p> <p>4 set with him and the answer was only in the event of</p> <p>5 a firefighter having gone missing, I think, Crew Manager</p> <p>6 Gallagher gave that evidence. Does that match your</p> <p>7 understanding?</p> <p>8 A. Yes, the BA second set is for assistance in rescue of</p> <p>9 firefighters, yes.</p> <p>10 Q. On the night, as you were deployed and told you were to</p> <p>11 go up to the 18th floor, did it cross your mind that it</p> <p>12 might have been useful to have a second set of BA to</p> <p>13 take up with you?</p> <p>14 A. I think it might -- historically -- I've never used one</p> <p>15 myself, but I think that you tend to have a situation</p> <p>16 where you try and make decisions that are sort of beyond</p> <p>17 you as a human: who do you give air to, who do you deny</p> <p>18 air from? Also, I was carrying hose and branches to the</p> <p>19 18th floor. I just didn't have enough limbs to carry</p> <p>20 more stuff.</p> <p>21 Q. That's the principal disadvantage, you can only carry so</p> <p>22 much stuff?</p> <p>23 A. Absolutely, yes.</p> <p>24 Q. Now, next turn to your ascent up the tower.</p> <p>25 You tallied out, as we've discussed, at 01.53, and</p> <p style="text-align: center;">Page 136</p>

<p>1 it's right that you and Firefighter Foster decided not 2 to put your masks on for the initial floors? 3 <b>A. That's correct.</b> 4 Q. Can you remember how many floors you went up where you 5 weren't under air, as it were? 6 <b>A. It wasn't very far. I think we made it up maybe two or 7 three flights of stairs before the atmosphere became 8 irrespirable for us. At that point we donned our BA 9 masks.</b> 10 Q. In your statement you describe how the stairs were busy 11 and there was screaming from lots of voices. Were you 12 able to identify whether the voices were firefighters 13 shouting out to residents or the voices were coming from 14 residents or both? 15 <b>A. It was a mixture of both. You could hear the voices of 16 firefighters muffled through their BA masks. You could 17 hear people who were obviously not wearing BA masks.</b> 18 Q. How long did it take you to get from the bridgehead to 19 the 18th floor? 20 <b>A. I've no idea. The reality is we had complete sensory 21 deprivation from the moment of putting our masks on. 22 You could hear muffled voices. We had no visibility. 23 We got up the stairs by feeling up the banisters. It 24 could've been 5 minutes, could've been 10 minutes, 25 I really don't know.</b></p> <p style="text-align: center;">Page 137</p>	<p>1 did this suggest to you that people needed to be 2 evacuated immediately once you got to them on the 18th 3 floor? 4 <b>A. No, I don't make a predisposed decision on the way up 5 there; I take things as I find them when I find them.</b> 6 Q. As you were going up -- 7 SIR MARTIN MOORE-BICK: I'm sorry, would you like to sit 8 a little further away from the microphone. I think the 9 ladies who do the shorthand may find it a bit booming 10 otherwise. Thank you. 11 MR KINNIER: As you were going up, would it cross your mind, 12 for example: are the conditions going to get worse? If 13 so, what am I going to do? Is that the type of thought 14 process that goes through your mind as you're going up? 15 <b>A. Yes, we constantly change decisions based on what we 16 find around us at that given time.</b> 17 Q. As you were going up, did that thought cross your mind? 18 <b>A. Absolutely.</b> 19 Q. Now, if we can turn now to the conditions you 20 encountered when you got onto the lobby of the 18th 21 floor. 22 Can you describe how the conditions in the lobby 23 compared to those you encountered in the stairwell? 24 <b>A. Exactly the same.</b> 25 Q. Now, in your statement you say that Firefighter Foster</p> <p style="text-align: center;">Page 139</p>
<p>1 Q. Can you remember whether the lighting in the stairwell 2 was working as you went up? 3 <b>A. The lighting was on; it had no effect on the staircase.</b> 4 Q. Can you remember, was it illuminated from the bridgehead 5 all the way up to the 18th floor? 6 <b>A. I can't. The smoke was so dense for us going up the 7 staircase, until we went to each landing and approached 8 the landing walls, we couldn't see the lights at all.</b> 9 Q. Radio comms as you went up. As you went up, what was 10 your experience of radio? 11 <b>A. Radio comms was very busy at the bridgehead. From 12 probably the moment I put our mask on to the moment we 13 left the building again, it was untenable, couldn't use 14 it.</b> 15 Q. Did you have a BARIE set? 16 <b>A. I had a BARIE set and a handheld radio, yes.</b> 17 Q. We've heard some evidence from some firefighters that 18 they carry mobile phones on them and use them during the 19 course of incidents. Did you have your mobile with you? 20 <b>A. No.</b> 21 Q. In your experience, have firefighters used mobiles where 22 radio comms have not worked? 23 <b>A. I would say no because it is against policy in London 24 Fire Brigade to carry mobile phones.</b> 25 Q. Given the conditions you'd encountered on the way up,</p> <p style="text-align: center;">Page 138</p>	<p>1 hung on to you as you went round doing a left-hand wall 2 search; is that right? 3 <b>A. Yes. So when we entered the lobby area of the 18th 4 floor, I had my left hand on the wall and Kate was 5 behind me.</b> 6 Q. Now, your notes suggest that you found people in flats 7 153 and 154. 8 Can you remember whether that's right or not? Are 9 you sure that's right? 10 <b>A. I'm not positive, no.</b> 11 Q. Could I ask Paul to draw up -- it was the exhibit to 12 Ms Foster's witness statement. The reference is 13 MET00015807. 14 I don't know whether you've seen this before, 15 Mr Lawson. 16 <b>A. (Nodded assent).</b> 17 Q. This is Ms Foster's hand-drawn plan of the 18th floor. 18 As you see in the bottom left-hand corner 1, 2, 3, 4, 5, 19 6, marked. You followed a left-hand search going from 20 flats 1, 2, 3, 4, 5 and 6; is that right? 21 <b>A. That's correct, yes.</b> 22 Q. Now, looking at that plan, which was the first flat in 23 which you encountered occupants? 24 <b>A. Number 2.</b> 25 Q. Where was the next flat in which you encountered --</p> <p style="text-align: center;">Page 140</p>

<p>1 <b>A. Number 3.</b></p> <p>2 Q. Thank you.</p> <p>3 Now, dealing first of all with flat 2, so that's</p> <p>4 flat 152, who did you meet there?</p> <p>5 <b>A. The first flat we got into was a young lady with three</b></p> <p>6 <b>children.</b></p> <p>7 Q. Had you banged on the door to attract her attention?</p> <p>8 <b>A. We had, yes.</b></p> <p>9 Q. How long did it take for her to open the door, can you</p> <p>10 remember?</p> <p>11 <b>A. Pretty quick. Again, I couldn't guess at the time, but</b></p> <p>12 <b>it was quick.</b></p> <p>13 Q. How far did she open the door, was it inches or was it</p> <p>14 broader than that?</p> <p>15 <b>A. It was cracked initially until we said who we were and</b></p> <p>16 <b>she opened the door to let us in.</b></p> <p>17 Q. So you said who you were, she let you in.</p> <p>18 <b>A. Yes.</b></p> <p>19 Q. How far into the flat did you go?</p> <p>20 <b>A. I went into her lounge and sat on her sofa.</b></p> <p>21 Q. Did Firefighter Foster accompany you within the flat?</p> <p>22 <b>A. She did, yes.</b></p> <p>23 Q. Was the flat entrance door closed after you came in?</p> <p>24 <b>A. It was, yes.</b></p> <p>25 Q. Who closed it?</p> <p style="text-align: right;">Page 141</p>	<p>1 <b>A. In my mind there, the situation where we turned up, to</b></p> <p>2 <b>take them outside that flat, I am pretty certain they</b></p> <p>3 <b>would've died in my arms on the staircase.</b></p> <p>4 Q. What advice did you give to the lady?</p> <p>5 <b>A. I told her to remain calm for her children. I told her</b></p> <p>6 <b>to make sure -- I told her we had to search the rest of</b></p> <p>7 <b>the floor. I told her that her room was obviously clear</b></p> <p>8 <b>enough and unaffected enough for me to remove my BA</b></p> <p>9 <b>mask, and that she'd be safe until we managed to get</b></p> <p>10 <b>someone back to save her.</b></p> <p>11 Q. Did you give her safety advice as to how to block doors</p> <p>12 with wet towels?</p> <p>13 <b>A. I did. I told her to put a towel behind the door when</b></p> <p>14 <b>we left.</b></p> <p>15 Q. As you left, what did you say to her?</p> <p>16 <b>A. I've no idea.</b></p> <p>17 Q. Did you say you would be back, for example?</p> <p>18 <b>A. I told her someone would come back for her, yes.</b></p> <p>19 Q. Did you say you would come back or someone?</p> <p>20 <b>A. I said someone would come back for her.</b></p> <p>21 Q. Did you explain to her what you were doing next?</p> <p>22 <b>A. I explained I'd search the rest of the floor, yes.</b></p> <p>23 Q. After you'd carried out the search of the other flats on</p> <p>24 the 18th floor, did you go back to flat 2?</p> <p>25 <b>A. Do you know, I'm not sure now. I'm sure I knocked on</b></p> <p style="text-align: right;">Page 143</p>
<p>1 <b>A. I believe it was Kate. We had to open it on our way out</b></p> <p>2 <b>again.</b></p> <p>3 Q. So you came into the lounge and sat down.</p> <p>4 <b>A. Yes.</b></p> <p>5 Q. What did Firefighter Foster do, can you remember?</p> <p>6 <b>A. She came in and joined me in the lounge.</b></p> <p>7 Q. Did she sit down or stay standing?</p> <p>8 <b>A. I can't recall that.</b></p> <p>9 Q. How would you describe the conditions within the flat?</p> <p>10 <b>A. Like this, they were clear.</b></p> <p>11 Q. Who started the conversation, as it were? Did you or</p> <p>12 did the lady?</p> <p>13 <b>A. No, that would've been me.</b></p> <p>14 Q. What did you say?</p> <p>15 <b>A. I introduced myself. The atmosphere was so clear,</b></p> <p>16 <b>I removed my helmet and my smoke hood and my BA mask so</b></p> <p>17 <b>I could speak clearly. I also thought it would help</b></p> <p>18 <b>calm the children rather than see me in full BA gear.</b></p> <p>19 <b>Discussed what was going on outside and that for the</b></p> <p>20 <b>moment, the time being, they were safe in this flat.</b></p> <p>21 Q. Okay.</p> <p>22 You saw there were children in the flat.</p> <p>23 <b>A. I did.</b></p> <p>24 Q. What consideration did you give to, for example,</p> <p>25 prioritising the evacuation of the children?</p> <p style="text-align: right;">Page 142</p>	<p>1 <b>the door again, but I really -- I honestly can't recall</b></p> <p>2 <b>that.</b></p> <p>3 Q. Do you recall anything about going back to flat --</p> <p>4 <b>A. I remember, once we'd been around the rest of the floor</b></p> <p>5 <b>and made our way back to outside her front door,</b></p> <p>6 <b>deliberating for a good few seconds as to the best</b></p> <p>7 <b>course of action, and I still didn't believe I was in</b></p> <p>8 <b>a position to save everyone on that floor with just two</b></p> <p>9 <b>firefighters.</b></p> <p>10 Q. When you say deliberated, were you talking with</p> <p>11 Firefighter Foster as to what the options were?</p> <p>12 <b>A. Yes.</b></p> <p>13 Q. Doing the best to help us now, can you summarise what</p> <p>14 you said to her or at least give us the gist of what you</p> <p>15 said?</p> <p>16 <b>A. Yes. Basically, when you're faced with nine people and</b></p> <p>17 <b>there's only two of you, me personally, I would find it</b></p> <p>18 <b>difficult to ask a parent to pick two children for me to</b></p> <p>19 <b>save. I think that's a decision no one could happily</b></p> <p>20 <b>make. I knew I couldn't take nine people down with just</b></p> <p>21 <b>two of us. We tried to see -- we waited a few seconds</b></p> <p>22 <b>to see if there was an opportunity to get them out in</b></p> <p>23 <b>clearer smoke. Didn't happen. We prioritised radio</b></p> <p>24 <b>messages and I stood on the staircase and yelled for</b></p> <p>25 <b>help.</b></p> <p style="text-align: right;">Page 144</p>

<p>1 Q. You considered that, and then you went back down. We'll</p> <p>2 come back on to the search of the other flats, but just</p> <p>3 to tail off this point now.</p> <p>4 What did you expect would happen to the occupants of</p> <p>5 flat 2 once you'd gone?</p> <p>6 <b>A. In all my time in the fire service, I expect flats and</b></p> <p>7 <b>buildings to behave in a certain way. If I can stand in</b></p> <p>8 <b>a room and remove my BA mask and converse with somebody,</b></p> <p>9 <b>I expect that to be the conditions in the building.</b></p> <p>10 <b>I didn't foresee them changing that badly. We had no</b></p> <p>11 <b>idea what was going on outside or how bad the fire</b></p> <p>12 <b>spread was.</b></p> <p>13 Q. Notwithstanding the conditions you'd experienced, you'd</p> <p>14 seen the tower from the outside when you'd arrived,</p> <p>15 you'd experienced the conditions in the stairwell and</p> <p>16 the conditions you experienced in the lobby, your</p> <p>17 effective assumption was that the position wouldn't</p> <p>18 deteriorate; is that a fair summary?</p> <p>19 <b>A. Yes, the assumption I was making was based on the fact</b></p> <p>20 <b>that people who had been opening stairwell doors on the</b></p> <p>21 <b>floors below had allowed smoke into the stairwell. And</b></p> <p>22 <b>the 18th floor, at that height there, I really didn't</b></p> <p>23 <b>think things would progress the way they did.</b></p> <p>24 Q. Final question in respect of the initial conversation</p> <p>25 you had with the woman within flat 2, did you ask her to</p> <p style="text-align: right;">Page 145</p>	<p>1 <b>healthy and well. He didn't indicate to me otherwise.</b></p> <p>2 Q. Did you go inside flat 3?</p> <p>3 <b>A. No, the door wasn't open further than head width.</b></p> <p>4 Q. It's always difficult, but can you give us some idea of</p> <p>5 how far the door was open?</p> <p>6 <b>A. It would be like opening a door to a salesman. A foot,</b></p> <p>7 <b>perhaps.</b></p> <p>8 Q. Firefighter Foster in her evidence describes from your</p> <p>9 position the gentleman being backlit from the light</p> <p>10 coming from within the flat.</p> <p>11 <b>A. I could see down the corridor, and I could see whether</b></p> <p>12 <b>another gentleman or an older child standing down</b></p> <p>13 <b>towards the far end of the corridor.</b></p> <p>14 Q. Could you see any smoke within --</p> <p>15 <b>A. No.</b></p> <p>16 Q. Did you have the sense that English was his first</p> <p>17 language?</p> <p>18 <b>A. I really couldn't remember that. The conversation was</b></p> <p>19 <b>understood from my perspective and I assumed from his</b></p> <p>20 <b>too.</b></p> <p>21 Q. There was nothing to suggest -- you didn't feel he</p> <p>22 couldn't make himself clear?</p> <p>23 <b>A. No.</b></p> <p>24 Q. Did he say to you that he wanted to talk?</p> <p>25 <b>A. No.</b></p> <p style="text-align: right;">Page 147</p>
<p>1 confirm what her flat number was?</p> <p>2 <b>A. I didn't, no.</b></p> <p>3 Q. Okay.</p> <p>4 Apologies for throwing that out of sequence, but</p> <p>5 after you left flat 2, is it right that you went to</p> <p>6 flat 3?</p> <p>7 <b>A. Yes, that's right.</b></p> <p>8 Q. Again, did you bang on the door?</p> <p>9 <b>A. Yes.</b></p> <p>10 Q. What did you say as you were banging on the door?</p> <p>11 <b>A. "London Fire Brigade, open the door if you can hear us",</b></p> <p>12 <b>something like that.</b></p> <p>13 Q. And the door was opened by a male occupant within?</p> <p>14 <b>A. That's correct, yes.</b></p> <p>15 Q. How far did he open that flat entrance door?</p> <p>16 <b>A. The door was cracked head width.</b></p> <p>17 Q. Did you initiate the conversation?</p> <p>18 <b>A. I did, I --</b></p> <p>19 Q. What did you say?</p> <p>20 <b>A. I asked him how many people were inside the flat. He</b></p> <p>21 <b>responded with five. I asked him if everyone was</b></p> <p>22 <b>healthy and well, he responded yes.</b></p> <p>23 Q. Did you ask him about what the smoke conditions were</p> <p>24 like in the flat?</p> <p>25 <b>A. No. Again, as I say, I asked him if everyone was</b></p> <p style="text-align: right;">Page 146</p>	<p>1 Q. Did he ask you for help?</p> <p>2 <b>A. No.</b></p> <p>3 Q. Did he say to you how many children he had within the</p> <p>4 flat?</p> <p>5 <b>A. No, the conversation pretty much went as: how many</b></p> <p>6 <b>people in the house? He told me five. I asked if he</b></p> <p>7 <b>was well, he said yes. Happy to stay in there? He said</b></p> <p>8 <b>yes. I told him I had to go and search the rest of the</b></p> <p>9 <b>floor, and if they were happy, to shut the door behind</b></p> <p>10 <b>me and put a towel down.</b></p> <p>11 Q. Did you say the fire was on the other side of the</p> <p>12 building?</p> <p>13 <b>A. I really can't recall that.</b></p> <p>14 Q. Is it possible?</p> <p>15 <b>A. It is possible, yes.</b></p> <p>16 Q. Did he ask you how long it would take for you to get him</p> <p>17 out?</p> <p>18 <b>A. Not to my recollection, no.</b></p> <p>19 Q. Again, is it possible or likely that he asked you that</p> <p>20 question?</p> <p>21 <b>A. I mean, I suppose anything's possible, but I really</b></p> <p>22 <b>don't remember that at all, no.</b></p> <p>23 Q. Given the information you've been provided that there</p> <p>24 were children within the flat, again, did you consider</p> <p>25 whether in relation to that flat and flat 2, once you</p> <p style="text-align: right;">Page 148</p>

<p>1 got that information, you could prioritise the</p> <p>2 evacuation of the children?</p> <p>3 <b>A. Absolutely, but again my -- obviously with children in</b></p> <p>4 <b>both flats, it only made my decision harder. You can't</b></p> <p>5 <b>between two people decide who can and can't, so my plan</b></p> <p>6 <b>was to get more firefighters to help me to get everyone</b></p> <p>7 <b>out at the same time.</b></p> <p>8 Q. Did you assume you would have sufficient time to</p> <p>9 complete the search of floor 18, get down, report to the</p> <p>10 bridgehead, and for fresh crews to be deployed to</p> <p>11 rescue?</p> <p>12 <b>A. Yes, or I wouldn't have done it.</b></p> <p>13 Q. But you couldn't have done it on your own?</p> <p>14 <b>A. I wouldn't have done it -- I wouldn't have made the</b></p> <p>15 <b>decision if I didn't think it would be okay.</b></p> <p>16 Q. If I could talk now about the rest of the 18th floor.</p> <p>17 You went to flat 4 after flat 3.</p> <p>18 <b>A. Yes.</b></p> <p>19 Q. And was the door open or closed?</p> <p>20 <b>A. Door was open.</b></p> <p>21 Q. Open as in --</p> <p>22 <b>A. Physically open, yes</b></p> <p>23 Q. What were the conditions like within that flat?</p> <p>24 <b>A. There was no light. It was a lot warmer than the other</b></p> <p>25 <b>side of the building. Extremely dark and smoky. Smoke</b></p> <p style="text-align: right;">Page 149</p>	<p>1 and 3, for example?</p> <p>2 <b>A. Yes, flat 2 and 3 were much cooler and in clean air</b></p> <p>3 <b>compared to the other side of the building, yes.</b></p> <p>4 Q. Did you open the door into flat 6?</p> <p>5 <b>A. No.</b></p> <p>6 Q. Could you tell from the surrounding ambient conditions</p> <p>7 whether there was a full-blown fire engaged in flat 6?</p> <p>8 <b>A. I couldn't tell, no.</b></p> <p>9 Q. I think its right you didn't have a thermal imaging</p> <p>10 camera with you.</p> <p>11 <b>A. We didn't, no.</b></p> <p>12 Q. Would that have been useful to take with you?</p> <p>13 <b>A. I think absolutely, everything we have is useful, but</b></p> <p>14 <b>the reality is you only carry one of each on each</b></p> <p>15 <b>appliance, and if you're sending out three crews from</b></p> <p>16 <b>each appliance, there's not enough to go around. You</b></p> <p>17 <b>pick and choose which you get.</b></p> <p>18 Q. Before you left the 18th floor, we've discussed flat 2.</p> <p>19 Did you go back to flat 3?</p> <p>20 <b>A. No.</b></p> <p>21 Q. You're sure of that?</p> <p>22 <b>A. Yes.</b></p> <p>23 Q. Now, it's right that you tried to radio down to the</p> <p>24 bridgehead that you'd found residents, including</p> <p>25 children; is that right?</p> <p style="text-align: right;">Page 151</p>
<p>1 <b>was almost at ground level.</b></p> <p>2 Q. I think I'm right in saying you went next to flat 5 and,</p> <p>3 again, the front door was open and same conditions?</p> <p>4 <b>A. Yes.</b></p> <p>5 Q. After you finished your search of 4 and 5, did you close</p> <p>6 the flat entrance doors after you?</p> <p>7 <b>A. I couldn't remember, I would've pulled them behind me,</b></p> <p>8 <b>yeah, but I can't be sure.</b></p> <p>9 Q. The next flat you searched was flat 6; is that right?</p> <p>10 <b>A. We couldn't get into flat 6.</b></p> <p>11 Q. But I mean you got --</p> <p>12 <b>A. That's correct.</b></p> <p>13 Q. You came round to the entrance door of flat 6.</p> <p>14 <b>A. Yes.</b></p> <p>15 Q. What did you experience once you got to the entrance</p> <p>16 door of flat 6?</p> <p>17 <b>A. Again, it was the same sort of thing. It was warmer on</b></p> <p>18 <b>that side of the building. I banged and kicked the door</b></p> <p>19 <b>but I had no response.</b></p> <p>20 Q. Was there a marked increase in heat around flat 6</p> <p>21 compared to, say, flats 1, 2 and 3?</p> <p>22 <b>A. No, I wouldn't say it was something I noticed massively.</b></p> <p>23 <b>Sorry, between 4 and 5 and 2 and 3?</b></p> <p>24 Q. Was there a marked difference in temperature between, on</p> <p>25 the one side, flat 6, and on the other side flats 2</p> <p style="text-align: right;">Page 150</p>	<p>1 <b>A. Yes, correct.</b></p> <p>2 Q. Were you able to get through?</p> <p>3 <b>A. No.</b></p> <p>4 Q. Ms Foster in her notes said you used both channels 6</p> <p>5 and --</p> <p>6 <b>A. Channel 1 for command, channel 6 for BA, yes.</b></p> <p>7 Q. Is it that she used those channels to communicate on her</p> <p>8 radio or you both were using those channels to</p> <p>9 communicate back down to the bridgehead?</p> <p>10 <b>A. No, we decided Kate would use her radio and I would use</b></p> <p>11 <b>my voice on the stairwell to alert other firefighters to</b></p> <p>12 <b>our need for help.</b></p> <p>13 Q. Did you attract any attention?</p> <p>14 <b>A. None.</b></p> <p>15 Q. One point that's arisen is whether it would've been</p> <p>16 possible to have gone back to flats 2 and/or 3 and ask</p> <p>17 to borrow their mobile phones to contact the bridgehead</p> <p>18 or someone else. How practical would that have been as</p> <p>19 a means of communication?</p> <p>20 <b>A. The reason we didn't go back and open that door a second</b></p> <p>21 <b>time was the conditions outside were so bad, it only</b></p> <p>22 <b>makes the conditions inside that flat worse. So to go</b></p> <p>23 <b>back I think would've been the wrong choice. It would</b></p> <p>24 <b>also be quite impracticable to assume we could phone</b></p> <p>25 <b>down through control, through all those phone calls, and</b></p> <p style="text-align: right;">Page 152</p>

<p>1 <b>meet somebody on the bridgehead who had time to answer</b></p> <p>2 <b>their mobile phone in the first place. So, no.</b></p> <p>3 Q. So you've completed the search of the 18th floor.</p> <p>4 <b>A. Yes.</b></p> <p>5 Q. You've tried to get through to the bridgehead via</p> <p>6 various means.</p> <p>7 Can you remember how much air you had left? Had</p> <p>8 your ADSU started to sound by this stage?</p> <p>9 <b>A. I think possibly by the time we decided that we weren't</b></p> <p>10 <b>getting help, to run and get help, my ADSU came on on</b></p> <p>11 <b>the staircase, yes.</b></p> <p>12 Q. Was the amount of air that both you and Firefighter</p> <p>13 Foster had left a factor in your consideration to leave</p> <p>14 the 18th floor and go back down to the bridgehead to</p> <p>15 debrief as to what you'd found?</p> <p>16 <b>A. Yes.</b></p> <p>17 Q. Is it right you considered trying to take down the</p> <p>18 occupants of flats 2 and 3 in a snake line?</p> <p>19 <b>A. Again, I thought I was doing the best for the families,</b></p> <p>20 <b>which means a personal physical contact with each and</b></p> <p>21 <b>every casualty if possible. With two of us, it wasn't</b></p> <p>22 <b>possible. The conditions in my eyes would've meant</b></p> <p>23 <b>anyone brought out of their flat would have suffered</b></p> <p>24 <b>greatly on the staircase. To have nine people in a line</b></p> <p>25 <b>behind you, I'd have no control over that. I think that</b></p> <p style="text-align: center;">Page 153</p>	<p>1 <b>of it or make sense of any of it. It really was quite</b></p> <p>2 <b>harrowing all the way down the staircase.</b></p> <p>3 Q. Did you come across any casualties being brought down</p> <p>4 the stairwell as you went down?</p> <p>5 <b>A. Yes. When we got down -- I mean, again, it's guessing</b></p> <p>6 <b>because your sort of perception of floors was lost quite</b></p> <p>7 <b>early on -- to I assume about the 5th or 4th floor, the</b></p> <p>8 <b>queue of firefighters waiting to get out with pre-alarms</b></p> <p>9 <b>going and whistles going, like a queue back up the</b></p> <p>10 <b>staircase, at this point here, casualties being brought</b></p> <p>11 <b>down, there wasn't enough space for people to come in</b></p> <p>12 <b>and leave the building, so casualties were passed down</b></p> <p>13 <b>on a conveyor belt, if you like.</b></p> <p>14 Q. Can you remember what condition the casualties were in?</p> <p>15 For example, were some being brought down unassisted?</p> <p>16 <b>A. Not that I've seen. The ones that were coming down at</b></p> <p>17 <b>that point were unconscious.</b></p> <p>18 Q. Did you see any casualties being brought down with the</p> <p>19 assistance of spare BA sets?</p> <p>20 <b>A. No.</b></p> <p>21 Q. Now, the next topic I'd like to discuss is your return</p> <p>22 to the bridgehead.</p> <p>23 Was the bridgehead on the 3rd floor at this time?</p> <p>24 <b>A. Yes, it was.</b></p> <p>25 Q. Your end of wear was at 02.27, which I think sounds</p> <p style="text-align: center;">Page 155</p>
<p>1 <b>would've been a worse outcome than the decision I made.</b></p> <p>2 Q. Is that a thought process you had at the time?</p> <p>3 <b>A. Absolutely, yes.</b></p> <p>4 Q. Is that something you articulated out loud to</p> <p>5 Firefighter Foster or something you internally</p> <p>6 considered?</p> <p>7 <b>A. No, I discussed everything at the 18th floor with Kate.</b></p> <p>8 Q. And she agreed that you couldn't --</p> <p>9 <b>A. She did.</b></p> <p>10 Q. -- employ a snake line.</p> <p>11 Now, as you went down the tower, can you describe</p> <p>12 the smoke conditions you encountered?</p> <p>13 <b>A. They are the same as when I entered.</b></p> <p>14 Q. Was the stairwell still illuminated, can you remember?</p> <p>15 <b>A. Yes, the lights were still on, but, again, the</b></p> <p>16 <b>illumination was very limited due to the thickness of</b></p> <p>17 <b>the smoke.</b></p> <p>18 Q. There have been varying descriptions of the amount of</p> <p>19 noise in the stairwell. Some people have said it was</p> <p>20 noisy, some have described silence, particularly more so</p> <p>21 once in the lobby areas.</p> <p>22 How much noise was there in the stairwell as you</p> <p>23 went down?</p> <p>24 <b>A. It was a really strange situation. Obviously there was</b></p> <p>25 <b>a lot of noise around you. It was hard to decipher any</b></p> <p style="text-align: center;">Page 154</p>	<p>1 about right.</p> <p>2 <b>A. That's about right. 35 minutes.</b></p> <p>3 Q. Could you describe for us the situation you found at the</p> <p>4 bridgehead?</p> <p>5 <b>A. It was -- I'd like to say organised chaos. There was</b></p> <p>6 <b>a lot of information, a lot of firefighters trying to</b></p> <p>7 <b>relay information back to the bridgehead, a lot of</b></p> <p>8 <b>information going in the other direction as well. A lot</b></p> <p>9 <b>of people trying to get their point across. It was --</b></p> <p>10 <b>it was difficult.</b></p> <p>11 Q. Who did you speak to at the bridgehead?</p> <p>12 <b>A. I have no idea.</b></p> <p>13 Q. Can you remember the rank? Was it a white helmet?</p> <p>14 <b>A. It was a white helmet, yes.</b></p> <p>15 Q. A man or a woman?</p> <p>16 <b>A. A male, and I would've thought station manager level.</b></p> <p>17 Q. Can you remember, to the best you can now, what debrief</p> <p>18 you gave when you got to the bridgehead?</p> <p>19 <b>A. Yes, I had told Kate to go out and get in some cool air.</b></p> <p>20 <b>I then explained to the person at the bridgehead exactly</b></p> <p>21 <b>where I'd been, to the 18th floor. I wasn't sure of the</b></p> <p>22 <b>flat numbers. I drew a similar sort of map to this and</b></p> <p>23 <b>I drew next to the door, the first flat, 4, and then 5</b></p> <p>24 <b>next to the flat above it.</b></p> <p>25 Q. On the plan, did you indicate how many adults, how many</p> <p style="text-align: center;">Page 156</p>

<p>1 children were in flats 2 and 3 respectively?</p> <p>2 <b>A. I think I said four persons, three kids in the first.</b></p> <p>3 <b>In flat 3, I wasn't aware of how many of each. I said</b></p> <p>4 <b>five casualties.</b></p> <p>5 Q. Just so we're clear, it seems as if you've done two</p> <p>6 drawings: one on the wall and one on the piece of paper;</p> <p>7 is that right?</p> <p>8 <b>A. The one on the piece of paper was down by the front door</b></p> <p>9 <b>to Mr Batterbee on the way out the building, yes.</b></p> <p>10 Q. Who did you give that to?</p> <p>11 <b>A. Charlie Batterbee.</b></p> <p>12 Q. Charlie Batterbee?</p> <p>13 <b>A. Yes.</b></p> <p>14 Q. Did he say what he was going to do with it?</p> <p>15 <b>A. Obviously we left the building to try and do the best we</b></p> <p>16 <b>could to try and get people in as fast as we can in the</b></p> <p>17 <b>right numbers. The plan I drew at the bridgehead was</b></p> <p>18 <b>purely so they knew where to go and what to expect when</b></p> <p>19 <b>they got there, information I didn't have when me and</b></p> <p>20 <b>Kate went, which would arm them better to deal with the</b></p> <p>21 <b>situation. On the way out, Charlie Batterbee and</b></p> <p>22 <b>someone else was taking FSG calls by the front door.</b></p> <p>23 <b>I then told him exactly what I told the bridgehead.</b></p> <p>24 Q. You drew the station manager's attention to what you'd</p> <p>25 drawn on the wall to make sure the information got</p> <p style="text-align: right;">Page 157</p>	<p>1 "18 mother + child, no flat no 152 [encircled]."</p> <p>2 Just for the avoidance of doubt, do you remember</p> <p>3 seeing that on the wall at any time?</p> <p>4 <b>A. No.</b></p> <p>5 Q. Did you see anyone writing any information on the wall?</p> <p>6 <b>A. As I say, when we got back to the bridgehead, there was</b></p> <p>7 <b>comms officers, people writing stuff everywhere. My</b></p> <p>8 <b>attention was purely to the OIC and the information was</b></p> <p>9 <b>passed to him.</b></p> <p>10 Q. If we could pan out of that, can you see anything you've</p> <p>11 written on that wall?</p> <p>12 <b>A. No.</b></p> <p>13 Q. No.</p> <p>14 Could I ask Paul to bring up MET00015815.</p> <p>15 Now, if we look at the middle column -- Paul, you</p> <p>16 can expand 152, 18th floor, which has got a line through</p> <p>17 it.</p> <p>18 Mr Lawson, can you make that out? Apologies,</p> <p>19 I think we're used to looking at these now.</p> <p>20 <b>A. It says four casualties, two adults, two children.</b></p> <p>21 Q. Exactly. A line has been put through 152, 18th floor,</p> <p>22 but 153 is not crossed out.</p> <p>23 First of all, have you seen this wall before, the</p> <p>24 writing on the wall before?</p> <p>25 <b>A. No.</b></p> <p style="text-align: right;">Page 159</p>
<p>1 through; is that right?</p> <p>2 <b>A. Yes.</b></p> <p>3 Q. Did he give the impression that he understood what you</p> <p>4 were communicating?</p> <p>5 <b>A. Again, like I said before, with information going back</b></p> <p>6 <b>and forth, he acknowledged that I'd written it and drawn</b></p> <p>7 <b>it. How much information he actually would've held,</b></p> <p>8 <b>I couldn't tell you.</b></p> <p>9 Q. Are you aware of what he did with the information you</p> <p>10 provided?</p> <p>11 <b>A. No.</b></p> <p>12 Q. Are you aware of what Charlie Batterbee did with the</p> <p>13 information you provided?</p> <p>14 <b>A. No.</b></p> <p>15 Q. Paul, might I ask you to put up on the screen</p> <p>16 MET00015819.</p> <p>17 Now, Mr Lawson, do you remember seeing this writing</p> <p>18 on the wall on the 3rd floor?</p> <p>19 <b>A. I remember lots of writing on the walls. I didn't read</b></p> <p>20 <b>any of it.</b></p> <p>21 Q. You didn't look at any of it?</p> <p>22 <b>A. On the way out, I didn't stand and read it. This would</b></p> <p>23 <b>be my exit.</b></p> <p>24 Q. Okay.</p> <p>25 If, Paul, you could magnify the writing:</p> <p style="text-align: right;">Page 158</p>	<p>1 Q. It was at the lobby entrance wall, if that's any</p> <p>2 assistance.</p> <p>3 <b>A. Yeah, I mean, as I say, when I came out of -- or entered</b></p> <p>4 <b>the staircase and took off my BA mask, forwarded the</b></p> <p>5 <b>information onto the crews at the bridgehead, I left the</b></p> <p>6 <b>building and didn't re-enter.</b></p> <p>7 Q. Going back, you spoke to Charlie Batterbee. Is it right</p> <p>8 that you told him where the flats were but not the flat</p> <p>9 numbers?</p> <p>10 <b>A. Yes. As I say, I couldn't recall the flat numbers.</b></p> <p>11 <b>I explained it was the 18th floor, it was the second</b></p> <p>12 <b>door on the left-hand search and the third door on the</b></p> <p>13 <b>left-hand search.</b></p> <p>14 Q. Just finally looking at these photos, Paul, if I could</p> <p>15 ask you to bring up photograph MET00015816.</p> <p>16 Now, I don't know whether you remember seeing this</p> <p>17 green wall on the ground floor.</p> <p>18 <b>A. No. No.</b></p> <p>19 Q. Is it fair to assume you didn't absorb any of the</p> <p>20 information written there?</p> <p>21 <b>A. I don't recall a green wall, no.</b></p> <p>22 Q. No, okay.</p> <p>23 The final topic I'd like to discuss with you,</p> <p>24 Mr Lawson, is the subject of radio communications</p> <p>25 slightly further.</p> <p style="text-align: right;">Page 160</p>



<p>1 Was there any way in which radio communications</p> <p>2 could've been improved on the night with the kit that</p> <p>3 you have there? When I say "you", I mean the LFB.</p> <p>4 <b>A. I really don't know. I mean, it's not fantastic at the</b></p> <p>5 <b>best of times. That sheer weight of traffic, I really</b></p> <p>6 <b>don't know how else you can cope with it. There's so</b></p> <p>7 <b>many people who needed assistance, needed help, needed a</b></p> <p>8 <b>priority message sent through, and there's a limited</b></p> <p>9 <b>amount of channels to receive it. So I don't know how</b></p> <p>10 <b>it could've been improved at all, no.</b></p> <p>11 Q. When there are problems with the radio comms, what</p> <p>12 workarounds are there to ensure you can get through to</p> <p>13 the bridgehead or entry control, or control generally?</p> <p>14 <b>A. For the most part, even in a high-rise where we sort of</b></p> <p>15 <b>generally start off two floors below the fire floor, the</b></p> <p>16 <b>stairwell is protected. We always have the availability</b></p> <p>17 <b>of using your voice to shout down a corridor and</b></p> <p>18 <b>(inaudible) downstairs. This wasn't simply possible.</b></p> <p>19 Q. What training do you get to enable you to work around</p> <p>20 any radio comms problems you have?</p> <p>21 <b>A. Obviously, as an organisation, there are things in place</b></p> <p>22 <b>they want to see adhered to. As individuals working on</b></p> <p>23 <b>the ground, that's not always possible. There's a lot</b></p> <p>24 <b>of autonomy in what we do and a lot of what it is based</b></p> <p>25 <b>on is experiences and skill sets that we have. Issues</b></p> <p style="text-align: center;">Page 161</p>	<p>1 know then whether Mr Kinnier has any more questions for</p> <p>2 you. Is that all right?</p> <p>3 THE WITNESS: Yes, absolutely.</p> <p>4 SIR MARTIN MOORE-BICK: Go with the usher, then, please.</p> <p>5 (The witness withdrew)</p> <p>6 SIR MARTIN MOORE-BICK: 2.55, then, please.</p> <p>7 (2.50 pm)</p> <p>8 (A short break)</p> <p>9 (2.55 pm)</p> <p>10 SIR MARTIN MOORE-BICK: Well, Mr Kinnier.</p> <p>11 MR KINNIER: Some brief supplementals, sir.</p> <p>12 SIR MARTIN MOORE-BICK: Yes.</p> <p>13 (The witness returned)</p> <p>14 SIR MARTIN MOORE-BICK: I think a few more questions,</p> <p>15 Mr Lawson.</p> <p>16 MR KINNIER: Mr Lawson, thank you very much.</p> <p>17 Could I ask for you to turn to page 3 of your</p> <p>18 witness statement. It will come up on the screen, which</p> <p>19 may be easier, Mr Lawson.</p> <p>20 <b>A. Okay.</b></p> <p>21 Q. It's really the final paragraph on page 3.</p> <p>22 <b>A. That's not mine.</b></p> <p>23 Q. You're describing now flat 3 and it's the second</p> <p>24 sentence. You say this:</p> <p>25 "The next door flat a gentleman answered the door,</p> <p style="text-align: center;">Page 163</p>
<p>1 <b>are reported later on. But for the most part, the</b></p> <p>2 <b>workaround is trying to do the best you can.</b></p> <p>3 Q. One issue that's cropped up in some of the points raised</p> <p>4 is whether it was practical -- you had difficulties</p> <p>5 yourself when you called down from the 18th floor to see</p> <p>6 if there were any passing firefighters. Would it have</p> <p>7 been practicable to have firefighters positioned almost</p> <p>8 as point people on various landings to assist with the</p> <p>9 evacuation of residents and comms --</p> <p>10 <b>A. In hindsight, there are many things that would've helped</b></p> <p>11 <b>our situation. I think at the given time, anybody</b></p> <p>12 <b>standing on the staircase doing nothing would've felt</b></p> <p>13 <b>that they were doing exactly that, and people want to</b></p> <p>14 <b>get involved and do the best they can. Standing around</b></p> <p>15 <b>unfortunately doesn't make you feel like you're doing</b></p> <p>16 <b>enough.</b></p> <p>17 MR KINNIER: Thank you very much. Those are the questions</p> <p>18 I have for the moment.</p> <p>19 Sir, might I ask the usual?</p> <p>20 SIR MARTIN MOORE-BICK: Yes.</p> <p>21 Well, it sometimes happens that after further</p> <p>22 reflection, other questions come to light, so we're</p> <p>23 going to have a 5-minute break now. Please don't talk</p> <p>24 to anyone while you're out of the room -- about your</p> <p>25 evidence, that is -- and we'll resume at 2.55 and we'll</p> <p style="text-align: center;">Page 162</p>	<p>1 he open[sic] the door to speak to me with the door on</p> <p>2 the latch, he told me he was inside with his family, he</p> <p>3 was safe and he didn't want to talk to me and then he</p> <p>4 shut the door again, I think in total he said there were</p> <p>5 five family members, I cannot remember what he looked</p> <p>6 like."</p> <p>7 Now, stopping there, given that there were children</p> <p>8 inside the flat, are you sure that this gentleman said</p> <p>9 he was safe?</p> <p>10 <b>A. Yes, I mean, again, I wouldn't have walked away if</b></p> <p>11 <b>someone was panicking or screaming for my help. If he</b></p> <p>12 <b>had opened the door fully and come towards me,</b></p> <p>13 <b>I would've done my best to get him out at that point.</b></p> <p>14 <b>The door wasn't opened more than, like I say, a foot.</b></p> <p>15 Q. Could I press you slightly, my question was: are you</p> <p>16 sure that he said he was safe?</p> <p>17 <b>A. Yes, I am pretty certain.</b></p> <p>18 Q. Are you saying it's likely or possible?</p> <p>19 <b>A. Likely. I wouldn't have walked away if he demonstrated</b></p> <p>20 <b>otherwise.</b></p> <p>21 Q. Are you sure that he didn't want to talk?</p> <p>22 <b>A. I'm pretty sure -- I didn't end the conversation.</b></p> <p>23 Q. Thank you.</p> <p>24 Could I turn to one final point, and it's when you</p> <p>25 were debriefing Mr Batterbee.</p> <p style="text-align: center;">Page 164</p>

<p>1 Did you say to Mr Batterbee when you were doing that</p> <p>2 that the reason why you couldn't complete the evacuation</p> <p>3 of the residents from the two flats on the 18th floor</p> <p>4 was absence of BA?</p> <p>5 <b>A. I made it abundantly clear at both the bridgehead and to</b></p> <p>6 <b>Charlie Batterbee that we needed more personnel on the</b></p> <p>7 <b>18th floor.</b></p> <p>8 Q. Did you mention the need for secondary sets or did you</p> <p>9 not mention second sets for the reasons you gave earlier</p> <p>10 on?</p> <p>11 <b>A. No, again, secondary sets are purely -- mainly for</b></p> <p>12 <b>firefighters. I've never seen them used on members of</b></p> <p>13 <b>the public before. But I made it abundantly clear more</b></p> <p>14 <b>firefighters were needed on the 18th floor immediately.</b></p> <p>15 MR KINNIER: Sir, I have no other questions, save to thank</p> <p>16 Mr Lawson for his time this afternoon. Thank you.</p> <p>17 SIR MARTIN MOORE-BICK: Thank you very much for coming to</p> <p>18 give evidence, Mr Lawson. You are free to go. The</p> <p>19 usher will look after you. Thank you.</p> <p>20 (The witness was released)</p> <p>21 MR KINNIER: Sir, the next witness is Firefighter Fernandes,</p> <p>22 I don't know whether there needs to be a rearrangement</p> <p>23 of the furniture. There does.</p> <p>24 Could you rise again, please, sir, and we'll sort</p> <p>25 out the furniture.</p> <p style="text-align: right;">Page 165</p>	<p>1 <b>A. That's correct, yes.</b></p> <p>2 Q. Have you read those documents recently?</p> <p>3 <b>A. I have, yes.</b></p> <p>4 Q. Do you confirm their contents are true?</p> <p>5 <b>A. Yes. A few errors in my statement. But --</b></p> <p>6 <b>SIR MARTIN MOORE-BICK: Would you like to point them out to</b></p> <p>7 <b>us now so we get them right?</b></p> <p>8 <b>A. There are quite a few. Some are change in language from</b></p> <p>9 <b>the police officer's language to what I would've said,</b></p> <p>10 <b>which changes the context slightly. So if it's okay,</b></p> <p>11 <b>could we correct them if and when we come to them?</b></p> <p>12 <b>SIR MARTIN MOORE-BICK: We may not come to them.</b></p> <p>13 MR KINNIER: If you can identify what they are now, then we</p> <p>14 can deal with them.</p> <p>15 <b>A. The first is the time of our first shout on the night of</b></p> <p>16 <b>Grenfell.</b></p> <p>17 Q. What page?</p> <p>18 <b>A. There were no calls until 00.55. That's the time of</b></p> <p>19 <b>call for the incident, not the time of call we were</b></p> <p>20 <b>mobilised from Chiswick.</b></p> <p>21 <b>SIR MARTIN MOORE-BICK: Right.</b></p> <p>22 <b>Yes, all right, thank you.</b></p> <p>23 <b>(Pause)</b></p> <p>24 <b>A. Okay, the other -- it's on my statement, I think it's</b></p> <p>25 <b>page 4, just towards the bottom, it says "maintaining</b></p> <p style="text-align: right;">Page 167</p>
<p>1 SIR MARTIN MOORE-BICK: Let me know when you're ready.</p> <p>2 MR KINNIER: Will do.</p> <p>3 (3.00 pm)</p> <p>4 (A short break)</p> <p>5 (3.05 pm)</p> <p>6 MR KINNIER: Sir, may I call Mr Fernandes.</p> <p>7 SIR MARTIN MOORE-BICK: Yes, thank you.</p> <p>8 AGNEL FERNANDES (affirmed)</p> <p>9 Questions by MR KINNIER</p> <p>10 SIR MARTIN MOORE-BICK: Thank you very much, Mr Fernandes.</p> <p>11 Yes, Mr Kinnier.</p> <p>12 MR KINNIER: First of all, would you please confirm your</p> <p>13 name for the record.</p> <p>14 <b>A. Agnel Fernandes.</b></p> <p>15 Q. Thank you very much for coming along today.</p> <p>16 On the lectern, you should have a blue folder, and</p> <p>17 if you open the blue folder, behind the first tab should</p> <p>18 be your statement dated 4 December 2017.</p> <p>19 <b>A. Yes.</b></p> <p>20 Q. If you turn over to the next tab, it should be your</p> <p>21 contemporaneous note.</p> <p>22 <b>A. Yes.</b></p> <p>23 Q. If you turn over to the final tab, that ought to be</p> <p>24 three exhibits, which are Google Maps which you</p> <p>25 exhibited to your statement. Is that right?</p> <p style="text-align: right;">Page 166</p>	<p>1 <b>contact with Firefighter Williams". There was a break</b></p> <p>2 <b>in our contact as we passed the lifts. We weren't</b></p> <p>3 <b>maintaining contact.</b></p> <p>4 <b>SIR MARTIN MOORE-BICK: All right. Thank you.</b></p> <p>5 MR KINNIER: Is that it?</p> <p>6 <b>A. From what I can remember right now, yes.</b></p> <p>7 MR KINNIER: Good, thank you.</p> <p>8 SIR MARTIN MOORE-BICK: That's fine, thank you very much.</p> <p>9 MR KINNIER: If there are any other matters, do shout.</p> <p>10 Now, as I have said to others, if at any time you</p> <p>11 want a break, please say so, that's not a problem. If</p> <p>12 at any time I ask you a question that's unclear, say</p> <p>13 that's unclear and I'll try and correct the lack of</p> <p>14 clarity.</p> <p>15 Mr Fernandes, the reason why you're here today is to</p> <p>16 help us. We want to focus on the FSG call in relation</p> <p>17 to flat 175 on the 20th floor. That's going to be the</p> <p>18 focus of my questioning.</p> <p>19 Now, before we get there, can we start with some</p> <p>20 basic questions about who you are and how long you've</p> <p>21 been in the fire service.</p> <p>22 First of all, is right you've been a firefighter</p> <p>23 since 2010?</p> <p>24 <b>A. That's correct, yes.</b></p> <p>25 Q. And that whilst usually based at Willesden, on the night</p> <p style="text-align: right;">Page 168</p>

1 of the fire you were based at Chiswick?

2 **A. That's correct.**

3 Q. That the call sign of the appliance you were riding that

4 night was Golf 371?

5 **A. That's correct.**

6 Q. And that on the night, Firefighter Vincent Williams was

7 your BA partner?

8 **A. That's correct.**

9 Q. In terms of timings, the LFB records indicate that you

10 mobilised at 01.26, you were mobile at 01.30, and you

11 were status 3 at 01.39. Does that sound about right to

12 you?

13 **A. That sounds about right, yes.**

14 Q. Again, relying upon the LFB's records, in terms of your

15 SDBA wear, they indicate SDBA disconnect from the

16 appliance was at 01.45, switched on at 01.51, and then

17 you tallied out at the bridgehead at 0200 hours. Does

18 that sound about right?

19 **A. Yes.**

20 Q. Okay.

21 The first matter I'd like to discuss with you is

22 entry to the tower and then your subsequent deployment.

23 Now, is it right that as you went into the tower,

24 Watch Manager De Silvo was carrying out a briefing?

25 **A. No, not --**

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1 bridgehead at the point you were deployed?

2 **A. It was busy. In a word, busy.**

3 Q. Did you sense that there was organisation there? There

4 were arrangements for the efficient deployment of crew?

5 **A. From what I now know to be the scale of the incident,**

6 **I think it was the best that could've been arranged.**

7 Q. Now, in relation to your instructions, you say you heard

8 Mr Welch and Mr Eden being briefed to go to the

9 20th floor; is that right?

10 **A. That's correct.**

11 Q. Did you overhear what the briefing was that they

12 received?

13 **A. No.**

14 Q. How did you know they were briefed to go to the

15 20th floor then?

16 **A. They were committed immediately before myself and**

17 **Firefighter Williams, that's to say they were in**

18 **earshot, perhaps 2 foot away. I was paying attention to**

19 **what Watch Manager De Silvo -- the information she was**

20 **passing on to crews being committed, and I have a clear**

21 **recollection of her looking at the BA crew immediately**

22 **in front of us and saying 20th floor.**

23 Q. You didn't hear anything else?

24 **A. No.**

25 Q. You and Mr Williams were briefed in respect of flat 175,

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1 Q. Was she carrying out a briefing at any time when you

2 were in the tower?

3 **A. Well, I understand your question to be was she**

4 **addressing a group and giving a briefing. No, that's**

5 **not the situation.**

6 Q. Did you receive a briefing from Watch Manager De Silvo

7 at any stage in the evening?

8 **A. Only as we checked in to BA entry control and handed our**

9 **tallies over, we were given our task.**

10 Q. Did you receive a briefing from any other officer before

11 then?

12 **A. Whilst in the BA queue, waiting to go through to the**

13 **bridgehead, there was information coming back to us in**

14 **brief and in passing. For example, we were told crews**

15 **are being committed in pairs, one member of the crew is**

16 **to take breaking-in gear, the other is to take a branch**

17 **and a length of 45-millimetre hose.**

18 **So, again, we weren't addressed with a formal,**

19 **structured briefing, it was just as the situation**

20 **developed.**

21 Q. In some of those predeployment briefings, if we can call

22 them that for ease of reference, did anyone explain to

23 you what the conditions were like further up the tower?

24 **A. No.**

25 Q. How would you describe the state of organisation at the

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1 which is also on the 20th floor. That's right, isn't

2 it?

3 **A. That is correct.**

4 Q. Do you think, given there were two crews behind each

5 other both being deployed to the 20th floor, would it

6 have been practicable to have formed a crew of four to

7 go up so as to have more resources for evacuations?

8 **A. Hypothetically, had there been more information, then**

9 **yes. My assumption is that that information wasn't**

10 **available, so as much information as -- the information**

11 **available was what was given to us.**

12 Q. Were you given any further specific detail in the

13 briefing regarding the number of adults and children

14 within the flat or any vulnerability or disabilities?

15 **A. No.**

16 Q. Paul, would you mind bringing up MET00015935.

17 Now, this is a forward information board. Have you

18 seen this particular board before?

19 **A. I don't think I have, no.**

20 Q. Do you remember seeing it at the bridgehead?

21 **A. I have a vague memory of a forward information board**

22 **being there, two BA entry control boards. I didn't --**

23 **the information on the board or my attention wasn't**

24 **taken to the board, or no information was passed on from**

25 **a board.**

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43 (Pages 169 to 172)

<p>1 Q. Could I try my luck and see whether you're able to</p> <p>2 assist on one point then, Mr Fernandes. You'll see at</p> <p>3 the far right-hand corner, roughly halfway down that</p> <p>4 board, a tick, 175, 20th floor and then what appears to</p> <p>5 be an asterisk.</p> <p>6 Can you help us with what that asterisk might mean?</p> <p>7 <b>A. No.</b></p> <p>8 Q. Can you remember whether Watch Manager De Silvo used</p> <p>9 this board for the purposes of briefing you or indeed</p> <p>10 the crew immediately before you?</p> <p>11 <b>A. Not to brief me and nothing that -- no, not that I'd</b></p> <p>12 <b>seen.</b></p> <p>13 Q. At the point you were deployed, what was your view about</p> <p>14 the feasibility of getting to the 20th floor on the</p> <p>15 basis of SDBA?</p> <p>16 <b>A. I accepted and took on the task and on the information</b></p> <p>17 <b>that I had, that we had gathered approaching the</b></p> <p>18 <b>building, which -- yes, it would've been a feasible</b></p> <p>19 <b>task.</b></p> <p>20 Q. Did Mr Williams express any scepticism about the</p> <p>21 feasibility of being able to get up to the 20th floor</p> <p>22 with SDBA?</p> <p>23 <b>A. Not at that point, no, and our confidence in taking on</b></p> <p>24 <b>the task would've been that we approached a building</b></p> <p>25 <b>with two columns of fire on the outside, and it was only</b></p> <p style="text-align: center;">Page 173</p>	<p>1 became difficult. Is that a fair summary of your</p> <p>2 evidence?</p> <p>3 <b>A. Yes. My floor numbers are a little bit of</b></p> <p>4 <b>an assumption. But, yes.</b></p> <p>5 Q. Can you remember whether the stairwell was illuminated</p> <p>6 as you went up, and if so, how far?</p> <p>7 <b>A. Initially, yes. Conditions began to fade after what</b></p> <p>8 <b>I believed to be floor 5, so it was only two or three</b></p> <p>9 <b>floors up from the bridgehead. They quite quickly got</b></p> <p>10 <b>very, very poor. So there was illumination, I know</b></p> <p>11 <b>there was bulkhead lighting, but the thickness and the</b></p> <p>12 <b>colour of the smoke made that lighting useless.</b></p> <p>13 Q. Did you have your BARIE set with you?</p> <p>14 <b>A. I did, yes.</b></p> <p>15 Q. How would you describe the adequacy of communications</p> <p>16 via the BARIE set with bridgehead entry control?</p> <p>17 <b>A. I recall hearing some radio traffic, non-specific,</b></p> <p>18 <b>I don't have a clear memory of what the conversations</b></p> <p>19 <b>were, and I have a clear recollection of them fading</b></p> <p>20 <b>out. So at one point I got nothing. I can't hear</b></p> <p>21 <b>anything in my earpiece.</b></p> <p>22 Q. Sorry to press you on this, I'm mindful of what you said</p> <p>23 earlier about vagueness of floors, but can you remember</p> <p>24 about what floor the BARIE set faded out, as it were?</p> <p>25 <b>A. I would suggest before the 10th.</b></p> <p style="text-align: center;">Page 175</p>
<p>1 <b>two columns of fire on one side of the building.</b></p> <p>2 <b>Thereafter, our time was inside the building. The</b></p> <p>3 <b>delay time from arrival to being committed was inside</b></p> <p>4 <b>the building in a BA queue, with no information about</b></p> <p>5 <b>how much the fire had developed or how much conditions</b></p> <p>6 <b>had deteriorated.</b></p> <p>7 <b>So being tasked to go to the 20th floor in what</b></p> <p>8 <b>I believe a normal high-rise incident to be would be</b></p> <p>9 <b>completely feasible.</b></p> <p>10 Q. There was no discussion at all of EDBA, whether they</p> <p>11 would be more appropriate?</p> <p>12 <b>A. Not at that stage, no.</b></p> <p>13 Q. You say "not at that stage"; was there a later</p> <p>14 discussion with anyone at the bridgehead as to whether</p> <p>15 EDBA was more appropriate than SDBA?</p> <p>16 <b>A. Later, post the incident, yes. But at the time of the</b></p> <p>17 <b>incident, the hours I was at the scene, I don't recall</b></p> <p>18 <b>anything like that.</b></p> <p>19 Q. Can I now turn to your deployment to the 20th floor and</p> <p>20 the conditions you experienced on the stairwell.</p> <p>21 Now, you tallied out at 02.01. Does that sound</p> <p>22 right to you?</p> <p>23 <b>A. Approximately. I have no recollection of exact timings</b></p> <p>24 <b>for the incident, but that seems to fit well.</b></p> <p>25 Q. I think your evidence is that after floor 5, visibility</p> <p style="text-align: center;">Page 174</p>	<p>1 Q. Did you have a handheld radio with you?</p> <p>2 <b>A. I did.</b></p> <p>3 Q. Did you try and use that at any stage on the ascent up</p> <p>4 to the 20th floor?</p> <p>5 <b>A. No, I had no reason to. I had the confidence of, again,</b></p> <p>6 <b>noise, a conversation happening on that radio. But,</b></p> <p>7 <b>again, similar area in the building, perhaps the 10th,</b></p> <p>8 <b>that would've fallen silent as well.</b></p> <p>9 Q. Did you have your mobile phone with you?</p> <p>10 <b>A. It may have been in my pocket. I can't be certain.</b></p> <p>11 Q. Did you have a need to use it at all during the course</p> <p>12 of the night?</p> <p>13 <b>A. No.</b></p> <p>14 Q. Did you see anyone else using mobile phones within the</p> <p>15 tower as a means of communication?</p> <p>16 <b>A. No.</b></p> <p>17 Q. Now, you got up to the 20th floor.</p> <p>18 <b>A. Yes.</b></p> <p>19 Q. Could you describe for us the conditions that you met as</p> <p>20 you went into the lobby on the 20th floor?</p> <p>21 <b>A. The lobby and the higher parts of the building were of</b></p> <p>22 <b>the same conditions: it was thick, black smoke, which</b></p> <p>23 <b>lighting wouldn't penetrate or illuminate. Just</b></p> <p>24 <b>a clearer black you could see with the lights or with</b></p> <p>25 <b>someone's torch. We went through the door, into the</b></p> <p style="text-align: center;">Page 176</p>

<p>1 lobby, stuck to the left-hand wall. You navigated by</p> <p>2 touch, and the only way to recognise flat numbers or</p> <p>3 door numbers was to be on your knees, with your face as</p> <p>4 close to the door as it could be. The numbers, from my</p> <p>5 recollection, were to the right-hand side of the letter</p> <p>6 boxes, approximately waist height or head height once</p> <p>7 you're on your knees. And when I say your face right up</p> <p>8 there, there's obviously a small distance for your BA</p> <p>9 mask and the visor on your helmet, and they would</p> <p>10 literally be -- they were in contact with the door in</p> <p>11 order to see the flat numbers.</p> <p>12 Q. Would you agree with Firefighter Williams's description</p> <p>13 that conditions on the 20th floor were floor to ceiling</p> <p>14 smoke? It sounds as if you would.</p> <p>15 A. Yes.</p> <p>16 Q. Could you hear the voices of Mr Welch or Mr Eden once</p> <p>17 you were at the 20th-floor lobby?</p> <p>18 A. Yes, I could hear noise.</p> <p>19 Q. Could you hear what they were saying?</p> <p>20 A. No.</p> <p>21 Q. Could you hear anything else once you'd got to the</p> <p>22 20th floor?</p> <p>23 A. We began -- well, I was banging on any door I came</p> <p>24 across, on my knees throughout that time, and I know</p> <p>25 other crews would've been because, yes, I could hear</p> <p style="text-align: right;">Page 177</p>	<p>1 A. I now know more detail as to that sequence of events,</p> <p>2 having spoken with Firefighter Williams.</p> <p>3 Q. Could you give us that detail? It would be helpful.</p> <p>4 A. I believe Firefighter Williams was ahead of me as he</p> <p>5 passed the lifts and came across 175. I now know that</p> <p>6 he'd made entry to that flat. I don't know whether that</p> <p>7 was by the residents opening the door or him forcing the</p> <p>8 door or simply trying the door and finding it was</p> <p>9 unlocked.</p> <p>10 Q. But you did not see him go in?</p> <p>11 A. I did not see that, no. I now know that he spoke to the</p> <p>12 family, tried to get them to leave with him voluntary.</p> <p>13 They were shocked and panicked. They didn't leave with</p> <p>14 him. It's at that point he's picked up the child that</p> <p>15 we carried down the stairs. He's got back to the door</p> <p>16 to 175, and that's when he shouted, or I've shouted and</p> <p>17 he's responded. Memory is vague over that. But that's</p> <p>18 where the rest of my statement comes together with me</p> <p>19 making contact with him again at the doorway.</p> <p>20 He's told me in -- I mean, our voice -- our</p> <p>21 communication is all muffled through the breathing</p> <p>22 apparatus we wear. Hearing is very difficult. Not only</p> <p>23 can you hear your own breath in BA, but the helmets and</p> <p>24 mask don't help with what you can hear.</p> <p>25 So he's got a message to me that I believe was</p> <p style="text-align: right;">Page 179</p>
<p>1 bangs and thuds and shouts. I assume, or as best my</p> <p>2 memory serves, there may have been muffled shouts of</p> <p>3 "Fire Brigade, anyone in come to the door", et cetera,</p> <p>4 things like that.</p> <p>5 Q. Thank you.</p> <p>6 Could I ask you to turn to page 4 of your witness</p> <p>7 statement. It will come up on the screen for you,</p> <p>8 Mr Fernandes. Really it's seven lines up from the</p> <p>9 bottom of the page. You say this, describing what you</p> <p>10 were doing on the 20th floor:</p> <p>11 "Firefighter Williams was ahead of me and identified</p> <p>12 Flat 175. Firefighter Williams shouted through the</p> <p>13 letter box and received a response. I think the door</p> <p>14 opened from inside. Firefighter Williams shouted</p> <p>15 'Casualty'. I shouted to both Firefighters Welch and</p> <p>16 Crew Manager Eden that there is a casualty. I tried to</p> <p>17 use my radio to inform control that we had identified a</p> <p>18 casualty, but it was at this point that I realised the</p> <p>19 radio was no longer working. I pressed the transmit</p> <p>20 button however the radio did not work. There were no</p> <p>21 communications being received on the radio, I cannot</p> <p>22 recall when this stopped working."</p> <p>23 Now, first, the impression is from that part of your</p> <p>24 witness statement that the casualty was inside flat 175.</p> <p>25 Is that your memory, or couldn't you tell at the time?</p> <p style="text-align: right;">Page 178</p>	<p>1 something along the lines of, "Get the door, get the way</p> <p>2 out, we've got casualties here."</p> <p>3 Q. The door he was referring to there was the door between</p> <p>4 the lobby and the stairwell; is that right?</p> <p>5 A. Would've been the lobby and the stairwell, as</p> <p>6 I understood it, yes.</p> <p>7 Q. At any point could you see into flat 175?</p> <p>8 A. No.</p> <p>9 Q. Did you see, just for the avoidance of doubt, the flat</p> <p>10 entrance door get opened by the male occupant?</p> <p>11 A. No, I didn't.</p> <p>12 Q. Could you see the occupants within the flat?</p> <p>13 A. No.</p> <p>14 Q. Could you hear them?</p> <p>15 A. I'm quite certain I've -- there was noise. I wouldn't</p> <p>16 be able to isolate or identify that noise as someone</p> <p>17 from that flat.</p> <p>18 Q. Now, in your witness statement, I think this is -- you</p> <p>19 heard a woman crying for her baby; is that right?</p> <p>20 A. As I made my way onto the stairwell, yes.</p> <p>21 Q. Can you remember for how long the woman was crying for</p> <p>22 her baby?</p> <p>23 A. No. No, I couldn't put a time on that. I heard several</p> <p>24 screams.</p> <p>25 Q. Do I understand your evidence correctly that you didn't</p> <p style="text-align: right;">Page 180</p>

<p>1 see any of the casualties until they were at the door</p> <p>2 between the 20th lobby and the stairwell, so you didn't</p> <p>3 see how many, who they were?</p> <p>4 <b>A. No, I didn't.</b></p> <p>5 Q. On the 20th-floor lobby, did Firefighter Williams pass</p> <p>6 to you or anyone else any information regarding the</p> <p>7 number of occupants within flat 175?</p> <p>8 <b>A. Not that I'm aware of.</b></p> <p>9 Q. Nothing along the lines of "X adults, Y children"?</p> <p>10 <b>A. Not that I'm aware of, no.</b></p> <p>11 Q. Given that you'd heard the woman cry, did you ask</p> <p>12 Firefighter Williams about the number of casualties</p> <p>13 within flat 175?</p> <p>14 <b>A. No. At that stage we began our descent with zero</b></p> <p>15 <b>visibility. So I knew my position having been pushed</b></p> <p>16 <b>towards, both verbally and finding the way to the door,</b></p> <p>17 <b>the lobby door, onto the stairwell, that my -- all</b></p> <p>18 <b>I could do then was guide Vincent, and knowing he was</b></p> <p>19 <b>carrying a child, through touch, guide them both down</b></p> <p>20 <b>the stairs safely.</b></p> <p>21 Q. Did you have any discussion, first of all, as to how</p> <p>22 Mr Williams and the child were to be brought down?</p> <p>23 <b>A. There may have been a brief conversation or we may have</b></p> <p>24 <b>been communicating as we moved, but I have no</b></p> <p>25 <b>recollection of what that conversation would've been.</b></p> <p style="text-align: center;">Page 181</p>	<p>1 <b>A. Yes.</b></p> <p>2 Q. Do you remember Firefighter Williams shouting to Mr Eden</p> <p>3 and Mr Welch that the family still within flat 175</p> <p>4 needed help?</p> <p>5 <b>A. No. My focus then was purely having -- I began descent</b></p> <p>6 <b>down the stairs backwards with my left hand around the</b></p> <p>7 <b>banister, centre to the staircase, my right hand on the</b></p> <p>8 <b>back of the child, staying in contact with Vincent and</b></p> <p>9 <b>the child at the same time. So my hand would have been</b></p> <p>10 <b>just above his wrist and on the child's back.</b></p> <p>11 Q. Is it right that you had no conversation with Mr Eden</p> <p>12 and Mr Welch about getting the family down from</p> <p>13 flat 175?</p> <p>14 <b>A. Not that I recall.</b></p> <p>15 Q. Dealing with your descent down the tower, is it right</p> <p>16 you heard other screams coming down the stairwell but</p> <p>17 couldn't help because you were helping with the priority</p> <p>18 evacuation, which was the child?</p> <p>19 <b>A. At varying points there were noises, possibly screams,</b></p> <p>20 <b>thuds. Yes, there were noises.</b></p> <p>21 Q. May I ask, could you make out whether those sounds were</p> <p>22 firefighters banging on doors or was it coming from</p> <p>23 residents attempting to attract attention?</p> <p>24 <b>A. I assume some of the thuds would've been firefighters</b></p> <p>25 <b>banging on doors. They seemed quite pronounced thuds,</b></p> <p style="text-align: center;">Page 183</p>
<p>1 Q. Did you have any discussion as to how the other</p> <p>2 occupants of flat 175 were to get down?</p> <p>3 <b>A. No. I was aware there were other occupants, again</b></p> <p>4 <b>guided by the woman's screams for her baby, but I was</b></p> <p>5 <b>also aware that there were two other firefighters on</b></p> <p>6 <b>that floor.</b></p> <p>7 Q. So you assumed that Mr Welch and Mr Eden would help</p> <p>8 their evacuation?</p> <p>9 <b>A. Yes.</b></p> <p>10 Q. Okay.</p> <p>11 Given the smoke conditions on the 20th-floor lobby</p> <p>12 and the stairwell, how practicable would it have been to</p> <p>13 have shared your BA with any of the casualties who were</p> <p>14 still in the flat to take them down?</p> <p>15 <b>A. Absolutely impossible.</b></p> <p>16 Q. Why do you say that, just so we can understand your</p> <p>17 reasoning?</p> <p>18 <b>A. The smoke was thick, black, acrid smoke, so strong that</b></p> <p>19 <b>you could actually taste the smoke. As your BA mask</b></p> <p>20 <b>moved with sweat, you could taste all I could describe</b></p> <p>21 <b>as burning rubber, burning tyres coming through in your</b></p> <p>22 <b>sweat.</b></p> <p>23 Q. So in response to the question, "How practical would it</p> <p>24 have been to have brought down all five occupants", it's</p> <p>25 the same answer?</p> <p style="text-align: center;">Page 182</p>	<p>1 <b>so my assumption is that they're on the outside of the</b></p> <p>2 <b>door and it's someone with some force. Not a muffled,</b></p> <p>3 <b>faint knocking for help.</b></p> <p>4 Q. You've got down to the bridgehead and you pass the child</p> <p>5 to Watch Manager O'Keeffe; is that right?</p> <p>6 <b>A. No, that's not correct.</b></p> <p>7 Q. What happened?</p> <p>8 <b>A. I continued with the child down the stairs. I came to</b></p> <p>9 <b>a bit of a bottleneck, three firefighters carrying one</b></p> <p>10 <b>adult casualty, and I couldn't see a way around them.</b></p> <p>11 <b>So I saw a firefighter then appear the other side of the</b></p> <p>12 <b>obstruction. I now know that to be Vince, having moved</b></p> <p>13 <b>around me, and I passed the child back to Vince, who</b></p> <p>14 <b>then I believe passed the child on to Watch Manager</b></p> <p>15 <b>O'Keeffe.</b></p> <p>16 Q. So the child got to Watch Manager O'Keeffe?</p> <p>17 <b>A. Yes, I believe -- I didn't see it being Watch Manager</b></p> <p>18 <b>O'Keeffe. It's what I've heard.</b></p> <p>19 Q. Okay. Were you relying upon what Mr Williams had told</p> <p>20 you?</p> <p>21 <b>A. Yes.</b></p> <p>22 Q. Did you give any debrief at the bridgehead about your</p> <p>23 experiences going up to the 20th floor?</p> <p>24 <b>A. Yes, but I cannot recall what I would've said.</b></p> <p>25 Q. Can you remember to whom you gave a debrief?</p> <p style="text-align: center;">Page 184</p>

<p>1 <b>A. I remember speaking both to Firefighter Alex</b>  2 <b>De St Aubin, who was entry control officer at the time,</b>  3 <b>and Firefighter Greg Lawson was there, but I have no</b>  4 <b>recollection whatsoever of any detail into that</b>  5 <b>conversation. I can't even distinguish whether I gave</b>  6 <b>a debrief or I just received my tally and left.</b>  7 Q. Firefighter Williams, was he part of the debrief you  8 gave or did he debrief separately?  9 <b>A. Must have been separately. I don't recall.</b>  10 Q. Do you remember seeing Mr Eden or Mr Welch at the  11 bridgehead --  12 <b>A. No.</b>  13 Q. -- at the point -- no.  14 Did you see any boards or walls being updated with  15 the information you gave?  16 <b>A. I have a memory of the bridgehead being quite congested.</b>  17 <b>Yes, someone would've been leaning against the wall</b>  18 <b>appearing to write something, but I was in absolute heat</b>  19 <b>exhaustion, physical exhaustion, and I have no memory of</b>  20 <b>leaving the bridgehead or getting to a place of rest</b>  21 <b>outside. So my memory from the bridgehead is</b>  22 <b>nonexistent.</b>  23 MR KINNIER: Mr Fernandes, thank you very much. Those are  24 the questions I have for you now.  25 Sir, might I ask you to rise for 5 minutes to see if</p> <p style="text-align: center;">Page 185</p>	<p>1 <b>A. It wasn't an option for -- in terms of how our rescue</b>  2 <b>developed, that was not an option.</b>  3 Q. Why do you say that?  4 <b>A. Firefighter Williams had the casualty at the door and in</b>  5 <b>his arms. His direction to me was to get to the exit.</b>  6 <b>So already aware of those conditions, that we can't see</b>  7 <b>anything, I couldn't see the exit myself, I remember</b>  8 <b>turning, knowing it was a colleague, Firefighter Welch,</b>  9 <b>by his stature, his stamp, I grabbed his attention and</b>  10 <b>we crossed paths, in that he passed me on to the doorway</b>  11 <b>and I passed him on to Firefighter Williams's direction.</b>  12 <b>So there were no resources around. I hadn't entered</b>  13 <b>the flat. I was very aware that the child that was in</b>  14 <b>contact with was exposed to this irrespirable atmosphere</b>  15 <b>and time was of the essence.</b>  16 Q. Second point is in his statement Mr Eden refers to a  17 high-rise grab bag that is taken to incidents in  18 high-rise fires.  19 First of all, are you aware of this bag?  20 <b>A. Yes, and as far as I'm aware, it was fully introduced</b>  21 <b>post-Grenfell.</b>  22 Q. Given that it was brought in after Grenfell, does this  23 grab bag set out a list of the items that are required  24 to be taken in response to high-rise incidents?  25 <b>A. I believe it does, yes.</b></p> <p style="text-align: center;">Page 187</p>
<p>1 there are any supplemental matters?  2 SIR MARTIN MOORE-BICK: Yes.  3 Mr Fernandes, we are going to rise to see whether  4 Mr Kinnier has other things to ask you. Please don't  5 talk to anyone about your evidence while you're out of  6 the room and be ready to come back at 3.35. All right?  7 If you would like to go with the usher, please.  8 (The witness withdrew)  9 SIR MARTIN MOORE-BICK: All right, 3.35, then, please.  10 MR KINNIER: Thank you, sir.  11 (3.30 pm)  12 (A short break)  13 (3.35 pm)  14 MR KINNIER: Some brief supplementals, please, sir.  15 SIR MARTIN MOORE-BICK: Yes, thank you.  16 (The witness returned)  17 SIR MARTIN MOORE-BICK: I think there are a few more  18 questions.  19 MR KINNIER: Mr Fernandes, thank you very much for your help  20 and particularly for coming back. Just three more  21 questions, so the end is near.  22 First of all, when you were assessing how to bring  23 casualties down from the 20th floor, did you consider  24 wrapping the casualties' faces/heads with damp towels or  25 damp sheets to assist them get through the smoke?</p> <p style="text-align: center;">Page 186</p>	<p>1 Q. What type of items are identified on this list, can you  2 remember?  3 <b>A. Firefighting equipment in terms of branches, hose,</b>  4 <b>breaking-in gear, spanners, hand tools for attempting to</b>  5 <b>operate riser outlets, things like that.</b>  6 Q. Is it as expansive as to include secondary BA sets or to  7 consider whether they should be in use --  8 <b>A. As far as I'm aware, no. Well, the kit doesn't. To</b>  9 <b>consider using, no.</b>  10 Q. Now, I suppose my final question flows on from my first  11 one. Where you don't have spare BA sets, where you're  12 encountering smoke conditions that you were on the 18th,  13 20th floors, how on Earth are you meant to get people  14 down safely? What protective measures can you employ to  15 allow them to be brought down to the bridgehead safely?  16 <b>A. I think generally, every rescue we encounter is truly</b>  17 <b>unique, so there isn't a one-size-fits-all solution or</b>  18 <b>answer to your question.</b>  19 <b>Many other high-rise incidents that I've attended,</b>  20 <b>stairwells are safe passage, so we find a way, whether</b>  21 <b>it be extract someone to the opposite side of the</b>  22 <b>building and perhaps a balcony as an interim measure, or</b>  23 <b>a protective stairwell ultimately should be exactly</b>  24 <b>that, protected and safe passage for not only ourselves</b>  25 <b>but for residents of the building.</b></p> <p style="text-align: center;">Page 188</p>

<p>1 MR KINNIER: Mr Fernandes, thank you very much for your time  2 this afternoon. Those are all the questions I have for  3 you, so thank you very much for attending the inquiry  4 today.  5 SIR MARTIN MOORE-BICK: Thank you very much indeed. It's  6 been really helpful to hear your evidence and we're  7 grateful to you for coming along.  8 THE WITNESS: Thank you, sir.  9 SIR MARTIN MOORE-BICK: Now you're free to go. Thank you  10 very much. If you would like to go with the usher.  11 (The witness was released)  12 MR KINNIER: Sir.  13 SIR MARTIN MOORE-BICK: Yes, Mr Kinnier.  14 MR KINNIER: The seventh and final witness for today is Crew  15 Manager Martin Hoare, and I don't think there needs to  16 be a furniture rearrangement. No, there doesn't.  17 SIR MARTIN MOORE-BICK: Does there need to be a documentary  18 rearrangement?  19 MR KINNIER: I think that's all been done. Yes.  20 SIR MARTIN MOORE-BICK: Good, thank you.  21 MARTIN HOARE (affirmed)  22 Questions by MR KINNIER  23 SIR MARTIN MOORE-BICK: Thank you very much, Mr Hoare.  24 Yes, Mr Kinnier.  25 MR KINNIER: First of all, can you please confirm your name</p> <p style="text-align: right;">Page 189</p>	<p>1 problem.  2 <b>A. Yes.</b>  3 Q. Secondly, if any of my questions are unclear, say so and  4 I'll try and correct them?  5 <b>A. Okay.</b>  6 Q. Now, just to give you a steer on what we'll be  7 considering today, my questions will focus on the  8 discovery of the male casualty on or about the  9 10th floor.  10 <b>A. Okay.</b>  11 Q. Before we get to that, just to establish some ground  12 work.  13 First of all, at the time of the fire, is it right  14 that you were a temporary crew manager stationed at  15 West Hampstead?  16 <b>A. That correct.</b>  17 Q. How long have you been a firefighter?  18 <b>A. 16 years now.</b>  19 Q. And throughout that time you've been with the LFB; is  20 that right?  21 <b>A. That's correct.</b>  22 Q. And the call sign of the appliance you were riding on  23 the night was Alpha 412?  24 <b>A. Yes.</b>  25 Q. And Firefighter Tanner was your BA partner; is that</p> <p style="text-align: right;">Page 191</p>
<p>1 for the record.  2 <b>A. Martin Hoare.</b>  3 Q. Good afternoon, Mr Hoare. Thank you very much for  4 coming along to give evidence today.  5 First of all, hopefully on the lectern there is  6 a blue file which contains behind the first tab your  7 witness statement dated 11 November last year; is that  8 right?  9 <b>A. That's correct.</b>  10 Q. Behind that should be your contemporaneous note; is that  11 right?  12 <b>A. That's correct.</b>  13 Q. Behind that, three exhibits to your police statement; is  14 that right?  15 <b>A. That's correct, yes.</b>  16 Q. Have you read all those documents recently?  17 <b>A. I haven't seen the plans at the end, but I've seen the</b>  18 <b>rest.</b>  19 Q. Do you confirm the contents of those documents are true?  20 <b>A. Correct, yes.</b>  21 Q. You're content for those documents to stand as your  22 evidence to this inquiry?  23 <b>A. I am, yes.</b>  24 Q. Mr Hoare, as we discussed with other witnesses, if at  25 any time you need a break, please say so, that's no</p> <p style="text-align: right;">Page 190</p>	<p>1 right?  2 <b>A. He was, yes.</b>  3 Q. Now, as to timings, the LFB's documents indicate that  4 you mobilised at 01.33, ie you were status 6 and you  5 elected to travel, I think?  6 <b>A. Yes.</b>  7 Q. Does that sound right?  8 <b>A. Sounds about right, yes.</b>  9 Q. You were mobile at 01.35.  10 <b>A. Yes.</b>  11 Q. And as to arrival time, there is no time, but the SDBA  12 disconnect from your appliance was at 01.48.  13 <b>A. Okay.</b>  14 Q. So can you remember how many minutes before 01.48 you  15 arrived, before you disconnected the SDBA?  16 <b>A. Almost immediately. We got straight off and grabbed our</b>  17 <b>sets.</b>  18 Q. Now, is it right in terms of the timing of the SDBA, you  19 switched them on at 02.53 and you tallied out at the  20 bridgehead at 02.55. Does that sound about right to  21 you?  22 <b>A. Yes, that's about right, yes.</b>  23 Q. First topic I'd like to discuss with you is your entry  24 and deployment, and really the process from the lobby to  25 the bridgehead in particular.</p> <p style="text-align: right;">Page 192</p>



<p>1 <b>A. Okay.</b></p> <p>2 Q. When you were waiting in the lobby area, did you receive</p> <p>3 any briefing regarding the building itself or the</p> <p>4 conditions within the building?</p> <p>5 <b>A. No.</b></p> <p>6 Q. Did you hear any anecdotal stories coming back?</p> <p>7 <b>A. Not whilst in the lobby, no.</b></p> <p>8 Q. As firefighters came out, did you get any information</p> <p>9 from them as to what they'd encountered?</p> <p>10 <b>A. No, not that I remember, no.</b></p> <p>11 Q. Did you see a watch manager at the lobby door writing</p> <p>12 FSG details down on the wall?</p> <p>13 <b>A. I didn't notice that at the time, no.</b></p> <p>14 Q. Paul, could I ask you to put up on the screen</p> <p>15 MET00005774.</p> <p>16 Just to double check, Mr Hoare, this is a photograph</p> <p>17 of the writing at the lobby.</p> <p>18 <b>A. Yes.</b></p> <p>19 Q. Do you remember seeing this at all?</p> <p>20 <b>A. I saw that, yes, but not on the way in.</b></p> <p>21 Q. Did you register any of the information?</p> <p>22 <b>A. No.</b></p> <p>23 Q. Now, turning to the bridgehead, is it right that the</p> <p>24 bridgehead was at the 3rd floor at this stage?</p> <p>25 <b>A. Yes.</b></p> <p style="text-align: right;">Page 193</p>	<p>1 Q. Can we now turn to the instructions you received at the</p> <p>2 bridgehead.</p> <p>3 Your original instructions were to go up to the</p> <p>4 10th floor, flat 74, to recover a diabetic man. Is that</p> <p>5 right?</p> <p>6 <b>A. That's correct.</b></p> <p>7 Q. Who gave you those instructions, can you remember?</p> <p>8 <b>A. I think it was Watch Manager De Silvo.</b></p> <p>9 Q. Was that all the information you were given?</p> <p>10 <b>A. Yes.</b></p> <p>11 Q. At the time, did you think that was sufficient for your</p> <p>12 purposes or would you have liked more?</p> <p>13 <b>A. No, that was good enough.</b></p> <p>14 Q. Now, as I understand it, your instructions were then</p> <p>15 changed to go to the 12th floor; is that right?</p> <p>16 <b>A. That's correct, yes.</b></p> <p>17 Q. What revised instructions were you given, first of all?</p> <p>18 <b>A. That there was a firefighter unaccounted for on the</b></p> <p>19 <b>12th floor. Last seen on the 12th floor.</b></p> <p>20 Q. Who gave you those amended instructions?</p> <p>21 <b>A. I think it was Watch Manager De Silvo.</b></p> <p>22 Q. Was it a particular urgency because it was an action in</p> <p>23 respect of a missing firefighter?</p> <p>24 <b>A. Yes, yeah, it was just forget the first brief and go to</b></p> <p>25 <b>the 12th to find the firefighter.</b></p> <p style="text-align: right;">Page 195</p>
<p>1 Q. Do you recall a board where the deployments were logged?</p> <p>2 First of all, can we turn to the forward information</p> <p>3 board, and if Paul could bring up document MET00018749.</p> <p>4 Do you remember seeing that?</p> <p>5 <b>A. I don't remember seeing the board, no.</b></p> <p>6 Q. Do you remember seeing it being used for the purposes of</p> <p>7 briefing crews at the bridgehead before deployment?</p> <p>8 <b>A. I don't really remember that, no. There was some</b></p> <p>9 <b>writing on the wall of the 3rd floor, but --</b></p> <p>10 Q. Flowing from that, if I ask Paul to bring up photograph</p> <p>11 MET00015824.</p> <p>12 Is that what you remember?</p> <p>13 <b>A. No. I remember there was a plan of the floor layout</b></p> <p>14 <b>that we looked at before we went up. Whether that was</b></p> <p>15 <b>on the wall or the board, I can't remember.</b></p> <p>16 Q. When you say "we looked at", did a watch manager or</p> <p>17 a more senior officer just take you through?</p> <p>18 <b>A. Yes, Watch Manager O'Keeffe and Watch Manager De Silvo</b></p> <p>19 <b>just told us to look at it and to familiarise ourselves</b></p> <p>20 <b>with the floor.</b></p> <p>21 Q. I know it's always tempting after I've finished</p> <p>22 a question, but mainly for the transcriber, if you wait</p> <p>23 for me to finish and then she can put everything down</p> <p>24 and record your answer.</p> <p>25 <b>A. Okay.</b></p> <p style="text-align: right;">Page 194</p>	<p>1 Q. Was it because it was a missing firefighter, you go in</p> <p>2 a crew of four; is that right? Or is it just --</p> <p>3 <b>A. No, not necessarily.</b></p> <p>4 Q. Can you remember why -- because your statement gives the</p> <p>5 impression you went to respond to this revised</p> <p>6 instruction in a crew of four; is that right?</p> <p>7 <b>A. It was two crews of two.</b></p> <p>8 Q. Two crews of two?</p> <p>9 <b>A. Yes.</b></p> <p>10 Q. Again, apologies, this may be a question directed to the</p> <p>11 obvious, but what's the reason for keeping the radio</p> <p>12 airways clear until the firefighter is recovered?</p> <p>13 <b>A. I don't know, that was -- that was happening.</b></p> <p>14 Q. Did you know the other members of the two-man crew who</p> <p>15 went with you?</p> <p>16 <b>A. No.</b></p> <p>17 Q. If I can ask you questions about your deployment to the</p> <p>18 12th floor, and in particular the conditions and the</p> <p>19 situation that you encountered on the stairwell.</p> <p>20 You tallied out, as we've discussed, at 02.55.</p> <p>21 As you left the bridgehead, can you describe smoke</p> <p>22 conditions as you went up to the 7th floor?</p> <p>23 <b>A. I think -- when we first went up to the 12th, do you</b></p> <p>24 <b>mean?</b></p> <p>25 Q. Yes, sorry.</p> <p style="text-align: right;">Page 196</p>

<p>1 <b>A. I think it was fine up to about floor 5 or 6 and then it</b>  2 <b>just started deteriorating.</b>  3 Q. Can you remember whether the stairwell is illuminated by  4 a light?  5 <b>A. I don't remember, but it must have been otherwise we</b>  6 <b>wouldn't have been able to see anything.</b>  7 Q. Can you remember how many casualties passed by coming  8 down the tower as you were going up?  9 <b>A. I don't remember any coming down when we was going up.</b>  10 <b>There was some when we were coming down that come past</b>  11 <b>us.</b>  12 Q. Can you remember any firefighters coming down as you  13 were going up?  14 <b>A. No, I don't remember any of that, no. I'm sure there</b>  15 <b>were but ...</b>  16 Q. Now, you got to the 12th floor. Can you give us  17 an idea, first of all, how the conditions on the  18 stairwell compared to the conditions you experienced on  19 the lobby of floor 12?  20 <b>A. Lobby was smoke-filled. It just got continually --</b>  21 <b>gradually worse as we got -- the higher we went.</b>  22 Q. I think it was whilst you were on floor 12 that you  23 received confirmation Firefighter Hill had been found;  24 is that right?  25 <b>A. That is correct.</b></p> <p style="text-align: right;">Page 197</p>	<p>1 because of the heat?  2 <b>A. Yeah, straight to the floor, yeah, and then Matt crawled</b>  3 <b>in to the actual lobby itself to have a look around, and</b>  4 <b>I was about to follow him when he found a casualty.</b>  5 Q. And what did he say to you?  6 <b>A. He just said, "I've got a casualty here."</b>  7 Q. And you brought the man from the lobby to the --  8 <b>A. Pulled him out onto the staircase, yeah.</b>  9 Q. Were you able to test for signs of life?  10 <b>A. I did try. I took my glove off. But I couldn't feel</b>  11 <b>a pulse or anything, but it was, you know -- I wasn't</b>  12 <b>surprised. He could've had a pulse, we wasn't sure.</b>  13 Q. What training do you have in detecting signs of life?  14 <b>A. That's it, really, check their pulse.</b>  15 Q. And that's it?  16 <b>A. Pretty much.</b>  17 Q. Is it right that you radioed the bridgehead to say that  18 you found a casualty on the 10th-floor lobby?  19 <b>A. Yes.</b>  20 Q. Did you get any response from them?  21 <b>A. I did, yeah, on my handheld. I just let them know we</b>  22 <b>found a casualty and we were unable to continue to</b>  23 <b>flat 74, and I can't remember what I got back, but I'm</b>  24 <b>pretty sure they confirmed they got the message.</b>  25 Q. If I can just divert for a second, in terms of radio</p> <p style="text-align: right;">Page 199</p>
<p>1 Q. You returned down the tower; is that right?  2 <b>A. I radioed through to say that we were going to continue</b>  3 <b>with our original brief, which was go to flat 74.</b>  4 Q. So you left the 12th floor and went down?  5 <b>A. Yes.</b>  6 Q. Did you get to the 10th floor?  7 <b>A. Yes.</b>  8 Q. How would you describe the conditions between the  9 stairwell and the lobby of floor 10?  10 <b>A. The stairwell was thick with smoke, but the actual lobby</b>  11 <b>itself, once we opened the door, was boiling hot.</b>  12 Q. I think in your statement at page 15 you describe it as  13 being like an oven; is that a fair description?  14 <b>A. Yes.</b>  15 Q. Was the heat such that you were effectively forced to  16 the ground?  17 <b>A. Straight to the floor, yeah.</b>  18 Q. How high off the floor was the smoke, can you remember?  19 Was it floor to ceiling or was there some --  20 <b>A. No, there was a gap. When you was down low, you could</b>  21 <b>probably see -- it might have been 2 foot or something</b>  22 <b>from the floor.</b>  23 Q. Can you help give us a picture of the conditions you  24 encountered. You entered onto the 10th-floor lobby.  25 What did you do next, when you were down on the ground</p> <p style="text-align: right;">Page 198</p>	<p>1 comms, on your initial ascent up the tower, did you  2 experience any issues with the radio comms?  3 <b>A. Yes, I had a BARIE set on, but it didn't work.</b>  4 <b>Channel 6 was crackling. That's why I switched it to --</b>  5 <b>I think I might have switched my BARIE set to channel 1,</b>  6 <b>but I certainly had my radio on.</b>  7 Q. Did you experience any problems with the use of your  8 handheld radio on your way up?  9 <b>A. Not when I went to use it, it was working.</b>  10 Q. Going back to the man, you brought him to the 10th-floor  11 stairwell.  12 <b>A. Mm-hm.</b>  13 Q. Then you took him down; is that right?  14 <b>A. We tried to, yes.</b>  15 Q. What happened next as you took him down?  16 <b>A. Well, we was on our way down, there were people coming</b>  17 <b>past, live casualties walking with firefighters which we</b>  18 <b>had to move out the way to let them pass, and we just</b>  19 <b>continued trying to get our casualty down.</b>  20 Q. You mentioned casualties on the way down. Can you  21 estimate how many you encountered?  22 <b>A. I'm not sure. Two or three. There may have been more,</b>  23 <b>but that's all I actually remember.</b>  24 Q. Can you give us an idea as to the condition in which the  25 casualties were as they were coming down the tower?</p> <p style="text-align: right;">Page 200</p>

<p>1 <b>A. Well, they were walking with the firefighters so, you</b>  2 <b>know, it was priority for those to get out, really.</b>  3 Q. Did you see whether any of them were getting down with  4 the benefit of BA sets or not --  5 <b>A. No.</b>  6 Q. -- or effectively unassisted?  7 <b>A. No, didn't see that.</b>  8 Q. Now, is it right that -- again, just recapping -- by the  9 7th floor, you were running out of air?  10 <b>A. Yes. Yes, we was running out of air.</b>  11 Q. What did you decide to do with the casualty that you  12 were bringing down the stairs?  13 <b>A. Well, we tried to switch round, because I had the</b>  14 <b>shoulders and head end, which we tried to turn round,</b>  15 <b>and then we both decided -- both our whistles were</b>  16 <b>going. There was also the warning -- the alarm was</b>  17 <b>going off to tell us that we was being evacuated.</b>  18 <b>I didn't hear it going off.</b>  19 Q. If you can help us with that, the alarm that sounds that  20 the building is going to be evacuated, that's a separate  21 and distinct alarm, is it?  22 <b>A. That's the ADSU that they can press that sets off your</b>  23 <b>alarm to let you know it's being evacuated, yeah.</b>  24 Q. And that makes a distinctive noise, does it, separate to  25 the --</p> <p style="text-align: center;">Page 201</p>	<p>1 <b>A. Yeah. We confirmed again with them that we couldn't</b>  2 <b>make it to flat 74 and that we had a casualty which we</b>  3 <b>found on the 10th. We got down to what we believed was</b>  4 <b>the 7th floor and we had to leave him there just because</b>  5 <b>we run out of air and to send somebody up to get him.</b>  6 Q. Did you give them a precise location --  7 <b>A. Yes.</b>  8 Q. -- as to where he was?  9 <b>A. We drew it on the map exactly where he was.</b>  10 Q. Did Firefighter Tanner do that with you or separately?  11 <b>A. Yes.</b>  12 Q. It was with you?  13 <b>A. I think it was separately as well. We both pretty much</b>  14 <b>said the same thing.</b>  15 Q. In terms of the identification of that casualty, you  16 identify him at page 25 of your statement as Mo Tuccu;  17 is that right?  18 <b>A. Well, that's -- yeah, I saw him on the news and I was</b>  19 <b>pretty sure that was him, yeah.</b>  20 Q. Were you aware that Mr Tuccu was carried out by  21 firefighters at 02.29?  22 <b>A. No.</b>  23 Q. Could I ask Paul to put up the CCTV schedule, and it's  24 MET00016072_0038. It's box 784.  25 Now, on the basis of that document, Mr Hoare, it</p> <p style="text-align: center;">Page 203</p>
<p>1 <b>A. Yeah, than the actual ADSU, yeah.</b>  2 Q. Does anything light up?  3 <b>A. Yeah, it lights up as well.</b>  4 Q. What lights up?  5 <b>A. I think there's -- I can't even remember, either green</b>  6 <b>lights or red lights that sort of flash.</b>  7 Q. And your training is once that's activated, you're to  8 get out?  9 <b>A. Well, you're supposed to, yeah, but I didn't hear it</b>  10 <b>going off because we were just breathing so heavy.</b>  11 Q. So is it right that you left the casualty at the  12 stairwell on the 7th floor?  13 <b>A. We had to, yes.</b>  14 Q. Now, you returned to the bridgehead. Did you report to  15 anyone once you got to the bridgehead?  16 <b>A. Yes.</b>  17 Q. To whom did you report?  18 <b>A. I don't know, but by this time the bridgehead was on the</b>  19 <b>ground floor.</b>  20 Q. Was it a female or a male officer?  21 <b>A. I think it was a male officer, I'm pretty sure.</b>  22 Q. White helmet or not?  23 <b>A. No, no, no.</b>  24 Q. Doing the best you can, can you recall precisely or give  25 us the gist of the words you gave in your debrief?</p> <p style="text-align: center;">Page 202</p>	<p>1 looks as if Mr Tuccu was brought out at 02.29. Given  2 you didn't tally out until 02.55 --  3 <b>A. Yes.</b>  4 Q. -- it's unlikely that --  5 <b>A. Yeah, absolutely, yeah. I said I couldn't be</b>  6 <b>100 per cent certain, but his face flashed up on the</b>  7 <b>screen on the news and I was sure that was him.</b>  8 Q. But that was the sole basis of identification, what  9 flashed up on the telly?  10 <b>A. Yes.</b>  11 Q. If that's right --  12 <b>A. That's going to be more right than me, I would imagine.</b>  13 Q. Could I just deal with a few other sort of ancillary  14 matters arising out of your witness statement.  15 At page 16 of your witness statement, you state that  16 an element of the rationale for not attending the male  17 in flat 74 was that it wasn't an FSG call.  18 Now, would you like to go back to page 16 of your  19 witness statement --  20 <b>A. No, no, no, that was more the police officer who was</b>  21 <b>asking me didn't really understand why we wouldn't have</b>  22 <b>proceeded to flat 74. So I've sort of -- I've gone over</b>  23 <b>the FSG extensively because she kept asking me. I said</b>  24 <b>it wasn't an FSG call, so -- but it wouldn't have really</b>  25 <b>made any difference. We would've still had to make</b></p> <p style="text-align: center;">Page 204</p>

<p>1 <b>a call when we found the casualty anyway.</b></p> <p>2 Q. In relation to the staircase, can you remember to what</p> <p>3 extent the staircase were obstructed by firefighting</p> <p>4 equipment and other media?</p> <p>5 <b>A. There was lots of personal possessions, clothing, bags,</b></p> <p>6 <b>you know, just general stuff people would've dropped on</b></p> <p>7 <b>the way down. There was hose and other equipment.</b></p> <p>8 Q. You mention at page 4 of your witness statement that the</p> <p>9 normal procedure is for a watch manager and his crew to</p> <p>10 be allocated to an individual FSG call. So for multiple</p> <p>11 FSGs, would you expect a watch manager and a crew to be</p> <p>12 allocated to each and every one of those?</p> <p>13 <b>A. Well, in normal circumstances, yes.</b></p> <p>14 Q. Implicit within that is your view that these were not</p> <p>15 normal circumstances; is that right?</p> <p>16 <b>A. Absolutely not, no. But at no time was we -- we wasn't</b></p> <p>17 <b>told that it was an FSG call.</b></p> <p>18 Q. Final question for now, Mr Hoare.</p> <p>19 You say at page 19 of your witness statement, and</p> <p>20 it's the third substantive paragraph, that you're not</p> <p>21 qualified to declare life as extinct.</p> <p>22 What training do you receive on assessing whether</p> <p>23 a casualty is alive or not and what actions to take if</p> <p>24 life is still present?</p> <p>25 <b>A. Well, we're not medically trained to say that someone's</b></p> <p style="text-align: right;">Page 205</p>	<p>1 permission.</p> <p>2 SIR MARTIN MOORE-BICK: All right, thank you. Well, let's</p> <p>3 ask Mr Hoare to come back in, shall we?</p> <p>4 (The witness returned)</p> <p>5 SIR MARTIN MOORE-BICK: I think just one, actually,</p> <p>6 Mr Hoare, but we'll see when Mr Kinnier gets going.</p> <p>7 Yes, Mr Kinnier.</p> <p>8 MR KINNIER: Mr Hoare, thank you very much, just one</p> <p>9 question.</p> <p>10 Before you left the male casualty on the 7th floor,</p> <p>11 were you able to detect any signs of life at all?</p> <p>12 <b>A. No. We did try again, but, no, we didn't detect</b></p> <p>13 <b>anything at all.</b></p> <p>14 MR KINNIER: Mr Hoare, I have no further questions for you.</p> <p>15 May I just say thank you very much for attending today,</p> <p>16 it's been valuable.</p> <p>17 THE WITNESS: No problem.</p> <p>18 SIR MARTIN MOORE-BICK: Certainly. Thank you very much</p> <p>19 indeed, Mr Hoare. It was very helpful to have your</p> <p>20 evidence. Now you are finished and you are free to go.</p> <p>21 Thank you very much, the usher will look after you.</p> <p>22 (The witness was released)</p> <p>23 SIR MARTIN MOORE-BICK: Yes, Mr Kinnier.</p> <p>24 MR KINNIER: Sir, that concludes today's business, save for</p> <p>25 one matter.</p> <p style="text-align: right;">Page 207</p>
<p>1 <b>life is extinct, so we have to presume that everyone is</b></p> <p>2 <b>alive until someone more qualified let's us know they're</b></p> <p>3 <b>not. So you have to treat everyone as if you need to</b></p> <p>4 <b>get them out.</b></p> <p>5 MR KINNIER: Mr Hoare, thank you very much for your time.</p> <p>6 <b>A. No problem.</b></p> <p>7 MR KINNIER: Sir, might I ask for the usual 5 minutes?</p> <p>8 SIR MARTIN MOORE-BICK: Yes. We normally have a short break</p> <p>9 so Mr Kinnier can decide if there are further questions</p> <p>10 we need to ask, so we'll stop now until 4.05.</p> <p>11 Please don't talk to anybody about your evidence</p> <p>12 while you're out of the room.</p> <p>13 THE WITNESS: Okay.</p> <p>14 SIR MARTIN MOORE-BICK: As I say, we'll resume at 4.05.</p> <p>15 THE WITNESS: Thank you.</p> <p>16 SIR MARTIN MOORE-BICK: If you would like to go with the</p> <p>17 usher then, please.</p> <p>18 (The witness withdrew)</p> <p>19 SIR MARTIN MOORE-BICK: All right, 4.05, please.</p> <p>20 MR KINNIER: Thank you, sir.</p> <p>21 (4.00 pm)</p> <p>22 (A short break)</p> <p>23 (4.05 pm)</p> <p>24 SIR MARTIN MOORE-BICK: Yes, Mr Kinnier.</p> <p>25 MR KINNIER: Sir, just one supplemental question, with your</p> <p style="text-align: right;">Page 206</p>	<p>1 Sir, I was going to ask whether we could start at</p> <p>2 9.30 tomorrow morning.</p> <p>3 SIR MARTIN MOORE-BICK: You've been speaking to Mr Millett!</p> <p>4 MR KINNIER: There have been communications, I can let you</p> <p>5 into that much.</p> <p>6 We have four witnesses in the morning. There have</p> <p>7 been a number of questions raised in relation to them.</p> <p>8 The hope and expectation is that we can deal with</p> <p>9 the first four witnesses hopefully by noon tomorrow, and</p> <p>10 I know the CPs' representatives will assist in that aim.</p> <p>11 That will allow, I'm told, sufficient time for</p> <p>12 examination of Mr Wolfenden to be done and completed by</p> <p>13 4.30 tomorrow.</p> <p>14 SIR MARTIN MOORE-BICK: Yes. Well, I know it's not popular</p> <p>15 anywhere for us to start early, but we do have to try</p> <p>16 and keep up with the timetable for the firefighter</p> <p>17 witnesses, because disruption to our timetable disrupts</p> <p>18 their working timetable, which is an important matter</p> <p>19 for us to take into account.</p> <p>20 MR KINNIER: It is.</p> <p>21 SIR MARTIN MOORE-BICK: So with that assurance, I will say</p> <p>22 9.30 tomorrow.</p> <p>23 MR KINNIER: I'm grateful, sir, thank you.</p> <p>24 SIR MARTIN MOORE-BICK: Good. 9.30 tomorrow, please, thank</p> <p>25 you.</p> <p style="text-align: right;">Page 208</p>

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2	(The hearing adjourned until Tuesday, 11 September 2018 at	
3	9.30 am)	
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