

1 Tuesday, 12 February 2013.

2 (10.00 am)

3 Housekeeping

4 THE CORONER: Yes, thank you. Do sit down. Yes,
5 Mr Maxwell-Scott.

6 MR MAXWELL-SCOTT: Good morning, madam. A small amount of
7 housekeeping.

8 THE CORONER: Yes.

9 MR MAXWELL-SCOTT: Firstly, I haven't had any responses

10 disagreeing with my proposal that Group Manager

11 Mark Andrews, Boyd Fisher and Stephanie Adams be removed

12 from the list of witnesses to be called and instead put

13 on the list of witnesses whose statements are to be read

14 under Rule 37, so that change will be made and it's

15 already foreshadowed in the latest version of the

16 timetable circulated at the weekend.

17 THE CORONER: Thank you. There's no dissent to that, I take
18 it? Thank you very much for your help with that. Yes.

19 MR MAXWELL-SCOTT: Secondly, there are some additions to the

20 bundles which Mr Atkins has. I think there are, in

21 summary, two: firstly five photographs of the control

22 room at brigade control to go into the jury bundle at

23 the back of what's currently tab 14, and secondly about

24 130 pages or so of documents to go at the back of file 4

25 of the advocates' bundles. They are a small number of

1 documents to do with familiarisation and 72D visits and
2 then the entirety of the annexes to the LFB control
3 report.

4 THE CORONER: Thank you very much. Have advocates seen
5 these yet? Not yet. So is the intention to be using
6 the photographs today and then the other pack will be
7 for a later day?

8 MR MAXWELL-SCOTT: The annexes to the control report will
9 also be used today with Mr Simmons.

10 THE CORONER: Ah, right.

11 MR MAXWELL-SCOTT: People have obviously had these from when
12 the control report was disclosed but they erroneously
13 were not included in the advocates' bundles.

14 THE CORONER: All right. Well, that's helpful. If
15 advocates need time to look at the annex before we have
16 evidence from Mr Simmons then let me know. All right,
17 thank you very much.

18 MR MAXWELL-SCOTT: There are also updated versions of the
19 disk that contains the latest set of advocates' bundles,
20 and they can be collected from Mr Atkins during the
21 course of the day.

22 THE CORONER: Thank you very much for preparing those.
23 That's very helpful. Thank you.

24 All right, does anyone else have anything to raise
25 before we ask the jurors to come in? Okay, thank you.

1 Yes, please could we ask the jurors to come in?

2 Thank you. We're beginning with Mr Paffett; is that
3 right?

4 MR MAXWELL-SCOTT: Yes.

5 THE CORONER: Yes, thank you. Are you in court, Mr Paffett?

6 Yes, would you like to come forward, thank you very
7 much. Have a seat at the witness table for a moment,
8 just while the jurors are coming in, and if you could
9 switch on your microphone in front of you that would be
10 helpful. Do help yourself to a glass of water.

11 (In the presence of the Jury)

12 THE CORONER: Yes, members of the jury, good morning. We're
13 going to begin this morning with evidence from
14 Mr Paffett. Thank you.

15 ANDREW PAFFETT (affirmed)

16 THE CORONER: Thank you, Mr Paffett, do sit down. Please
17 could you keep your voice up, as we'll all need to hear
18 what you're saying. If you speak close to the
19 microphone that will help. If you direct your answers
20 across the room towards the jurors, then that will help
21 them to hear and also help to keep you close to the
22 microphone. You can move the microphone to suit you.

23 Mr Maxwell-Scott, who is standing, is going to ask
24 questions on my behalf, and then there will probably be
25 questions from others.

1 A. Okay, thank you.

2 Questions by MR MAXWELL-SCOTT

3 MR MAXWELL-SCOTT: Good morning, Mr Paffett.

4 A. Good morning.

5 Q. Can you give the court your full name please?

6 A. Andrew John Paffett.

7 Q. I'm going to be asking you about your involvement in the
8 attempts to fight the fire and carry out search and
9 rescue operations at Lakanal House on 3 July 2009. Is
10 it right that at that time you were a watch manager A
11 serving with the London Fire Brigade?

12 A. That is correct.

13 Q. When did you first join the London Fire Brigade?

14 A. February 1990.

15 Q. Back in July 2009, did you work on a command unit?

16 A. Yes, I did, at Islington.

17 Q. Was that command unit 2?

18 A. Yes, correct.

19 Q. When did you first join command unit 2 in Islington?

20 A. 17 November 2007.

21 Q. Before 3 July 2009, had you ever been to Lakanal House?

22 A. No, I had not.

23 Q. In that case, I'll turn straight away to the events of
24 3 July 2009. If I tell you that as I understand it, you
25 were mobilised at 1638 hours, and then ask you to look

1 in the advocates' bundles at page 397, which is in
2 file 1. (Handed) If you look in the bottom box on this
3 page. Just to explain, the page is a transcript or
4 typed-up version of radio traffic between units and
5 brigade control, and the bottom box on the page is timed
6 at 16.48.35. It records CU2 as saying:

7 "FS Charlie Uniform 2 now status 2 on this channel."
8 Just explain what that means.

9 A. We have four channels in the London Fire Brigade, and at
10 the time we used to send our messages via these
11 channels. FS was channel 2, which is for the southern
12 part of London, where this area was, and the status 2
13 would say that we are mobile to the incident and
14 listening on that channel.

15 Q. Is that an indication of when you started your journey
16 from Islington?

17 A. No, that wouldn't be an indication of when we started
18 the journey. We might have booked status 2 on our home
19 channel, which is channel 3, and it might have been the
20 fact that the message on the radio at that time was busy
21 and we were unable to get through to control.

22 Q. Thank you. Whilst on your way to Lakanal House, would
23 you have been able to listen to radio messages between
24 brigade control and appliances that were either
25 travelling to the scene or at the scene?

1 A. Yes, we would have heard the messages from control,
2 bearing in mind that I would have also been trying to
3 navigate the vehicle by reading an A to Z and speaking
4 to the driver, so I might miss some messages that we
5 actually hear en route.

6 Q. So would it be fair to say that your focus would have
7 been on getting to the scene safely and promptly?

8 A. Yes, it would have been.

9 THE CORONER: Mr Paffett, you're speaking quite softly. Do
10 you think you could try and keep your voice up a little?
11 Thank you.

12 A. Yes, sorry.

13 MR MAXWELL-SCOTT: Turning then to when you arrived at the
14 scene, if we look at page 934. I'll put it up on the
15 screen first and if you need the hard copy, do let me
16 know. In the bottom third of the page, about ten lines
17 down, there's a reference to CU2, and under the column
18 headed "Arr" for arrival, we see the time 16.59.49. Do
19 you see that?

20 A. Yes, I do.

21 Q. Do you recall if another command unit was already at the
22 scene?

23 A. Yes, Charlie Uniform 4, Lewisham's command unit, was
24 already there when we pulled up in the road.

25 Q. Did you know you were going to be the second command

1 unit?

2 A. Yes, on the call slip it would have already stated that
3 CU4, Lewisham's command unit, would have been in
4 attendance. Being a six pump incident, we go on as
5 second unit to back them up or vice versa.

6 Q. As the second command unit on the scene, would there be
7 specific tasks that would automatically fall to your
8 crew?

9 A. It's become a normal practice that the second command
10 unit would take a marshalling role as the first two
11 operators would be involved in other information, with
12 dealing with the incident commander and radios, so
13 normally one person would always take the marshalling
14 role.

15 Q. Who were your fellow crew members that afternoon?

16 A. That afternoon it was Watch Manager Colin Evans and
17 Watch Manager Andrew Huggens.

18 Q. Did your command unit park close to command unit 4?

19 A. We parked, I would say, probably about 100 metres up the
20 road from command unit 4 to the rear of it.

21 Q. Did you and your fellow crew members then make your way
22 to command unit 4?

23 A. Yes, we did go down to command unit 4 first.

24 Q. Who was at command unit 4 when you got there?

25 A. The only person I can actually remember was Watch

1 Manager Martin Cook. I can't remember if there was
2 anyone else on the unit at the time.

3 Q. Did he or someone else in authority give you a task or
4 instructions or did you automatically take on
5 a particular role?

6 A. I can't remember if he gave us a task, but I believe
7 I took the role on.

8 Q. What role was that?

9 A. Marshalling officer -- sorry, mapping officer.

10 Q. Can you explain to the members of the jury what the
11 responsibilities of a mapping officer are at a scene
12 like this?

13 A. The responsibilities of a mapping officer at incident is
14 to go round and plot where appliances are parked, what
15 their call signs are so we know where they are, who is
16 in charge, if it's been sectorised, an incident, who is
17 in charge of that, if there are safety officers in
18 place, what their names are, generally gathering
19 information, going back to the command unit to update
20 boards within the incident command vehicle, which was
21 Charlie Uniform 4 at the time.

22 Q. The description you've just given -- correct me if I am
23 wrong -- would appear to relate essentially to mapping
24 of what London Fire Brigade staff were doing outside the
25 building?

1 A. That is correct.

2 Q. To what extent would the role of mapping officer
3 ordinarily include creating maps of what's going on
4 inside a building, and in particular the locations of
5 occupants?

6 A. We wouldn't generally enter a building because of
7 passing an area that is not safe for us because we don't
8 wear breathing apparatus. We're limited to where we can
9 go to, so occupants within the building would be more
10 difficult to locate. I did take that role on later in
11 the evening, but at that point that wasn't the primary
12 role, to try and locate. We needed to find out where
13 firefighters were, officers, and the command chain was.

14 Q. Well, I can understand what you say about not entering
15 the building but it might be thought that it would at
16 least be possible to begin mapping what is going on
17 inside the building without actually having to enter it,
18 and so if I could therefore come back to my original
19 question, which was: to what extent would trying to
20 build up a picture or map of the inside of the building
21 be something that you would automatically take on as
22 mapping officer?

23 A. On that point, we would do a two dimensional drawing
24 within the command unit, which would give you floors,
25 but we wouldn't be able to give you maps of where

1 specific flats were within that building, 'cos we don't
2 have plans of them on the command unit. We would try
3 and get plans whilst at the incident if they were
4 available, or someone could give us plans.

5 Q. What would your priority be in terms of mapping as
6 mapping officer on arrival?

7 A. We -- well, my priority is basically getting, as I said,
8 the chain of command of officers and bits and pieces,
9 but if a member of the public come up and said they knew
10 that someone was somewhere, I would then pass that
11 information back to the command unit, as is in parts of
12 my statement.

13 Q. Before we come to that, I just want to be clear on
14 whether on arrival, attempting some form of mapping of
15 the interior of the building or the flat numbering
16 system would be an equal priority to mapping the
17 presence of appliances, or whether the initial priority
18 would be the presence of appliances and the sectors?

19 A. The initial priority -- they go together, really, but
20 the initial priority would be the fire appliances and
21 sectors. Mapping of the inside of the building and
22 numbering becomes very difficult. If we can't enter the
23 building, we can't map how it is, as every building's
24 different and every building is different. It turned
25 out these flats were over two floors, where other flats

1 I've been to are on a single floor, so it's very
2 difficult to map a single building by going on
3 a numbering system that's outside. It might say floors
4 with flats 1 to 20 but it won't tell you which end 1 is
5 and which is 20, and if I'm not able to enter that
6 building, I'm unable to identify where flats would be
7 within the building.

8 Q. So what did you start doing on arrival?

9 A. Once I'd been to Charlie Uniform 4, I then made my way
10 round towards Watch Manager Derryck Best, who was the
11 team leader at the time, with the incident commander, to
12 liaise with them. But I would also do a -- a quick plan
13 of where roads are --

14 THE CORONER: Sorry, you said you also do a quick what?

15 A. Sorry, the microphone keeps cutting out. I do a quick
16 plan, as I'm going round, of where roads are and other
17 buildings adjacent to the building and a quick
18 two-dimensional plan of the building, what I'm looking
19 at, so I can draw where vehicles are to take it back to
20 the unit.

21 Q. Before you met Mr Best, did you have any communication
22 or conversations with other firefighters at the scene
23 that you particularly remember?

24 A. I was approached by the crew manager of Echo 216, which
25 is Lewisham's fire rescue unit, to say that he'd had

1 a young lady come up with a phone call to say that there
2 were five occupants in flat 81, I believe it was.

3 Q. In the statement that you gave back in November 2009,
4 you said that you thought that conversation took place
5 just after the Lewisham FRU had arrived?

6 A. That is correct, yes.

7 Q. If we look again at page 934. Echo 216 are at the very
8 bottom of the page and they are noted as having arrived
9 at 17.02.24.

10 A. Yes, that's correct.

11 Q. So you think very shortly after that you had
12 a conversation with the crew manager, whom we now know
13 to be Crew Manager Niblett, and he told you that he'd
14 spoken to a woman about five people being trapped in
15 flat 81?

16 A. That is correct. The female was with him at the time as
17 well.

18 Q. Did you speak to her yourself?

19 A. No, I did not.

20 Q. What did you do with that information?

21 A. As I got round the corner, I see Watch Manager Best and
22 the incident commander and immediately pass the
23 information on to them.

24 Q. Do you recall who was the incident commander at that
25 time?

1 A. No, I do not.

2 Q. If you can help with this then do, and if you can't then
3 just say so, but did you gain any impression as to
4 whether the information you gave Mr Best and the
5 incident commander about flat 81 and five people trapped
6 in it was telling them something they knew already or
7 telling them something new?

8 A. I can't remember on the impression side of it but I do
9 know that they told me to go and tell the sector
10 commander straight away.

11 Q. Did they say anything to you about how many sectors
12 there were at this time, what they were?

13 A. I can't remember if Watch Manager Derryck Best or
14 whether Watch Manager Martin Cook on the command unit
15 told me it had been sectorised, but I was aware that it
16 had been sectorised into two sectors: 1 and 3.

17 Q. And if you have two sectors, is it standard that they're
18 called sector 1 and sector 3?

19 A. It's not necessarily standard. It depends on how the
20 building's been sectorised. Sector 1 is always what's
21 deemed to be the main entrance to the building, sector 3
22 being the rear of the building, and it will go round in
23 a clockwise fashion, 2 to the right-hand side, 4 to the
24 left-hand side, and we could have sectors 5 and 6 if it
25 becomes more complicated.

1 Q. Anyway, you were told there were two sectors, 1 and 3.
2 If I show you an aerial photograph to try and get your
3 assistance with how that system worked. This is
4 photograph 3. In the middle of the page is
5 Lakanal House, which I'm marking now with the arrow.
6 I think you had parked your command unit vehicle in the
7 same road as command unit 4, which was Havil Street,
8 which runs north/south.

9 A. That's correct.

10 Q. Can you assist with where you met Mr Best and the
11 incident commander?

12 A. I met Watch Manager Derryck Best and the incident
13 commander roughly where those trees are in the middle of
14 the buildings.

15 Q. Is that where my arrow is?

16 A. If you take your cursor slightly to your left-hand side,
17 it would be round about that area there.

18 Q. So on the west side of the building? It is.

19 A. I'll take it it is the west side of the building.

20 Q. Was that sector 1 or sector 3, as you understood it?

21 A. As I understood it, that was sector 1.

22 Q. The east side of the building where the stairs were,
23 into and out of the building, was that sector 3?

24 A. That was sector 3.

25 Q. What was it that the incident commander and

1 Watch Manager Best wanted you to do with the information
2 about flat 81?

3 A. They wanted the information passed to the sector
4 commander of the fire sector on the -- in sector 3.

5 Q. So they wanted you to go round to sector 3 and tell the
6 sector commander there?

7 A. Yes, I did.

8 Q. Did they tell you who the sector commander there was or
9 would you be left to find that out by looking for their
10 tabard?

11 A. I can't remember if they told me, but I was -- it would
12 have been part of my responsibility to find that
13 information out anyway, but I would have found them by
14 their tabard.

15 Q. So what did you do after that conversation with
16 Watch Manager Best and the incident commander?

17 A. I proceeded round the building. If I remember rightly,
18 I went round -- I think it's Delapole Street?

19 Q. Dalwood Street?

20 A. That's it; Dalwood Street.

21 Q. To the north?

22 A. That's correct, and then made my way straight round the
23 building.

24 Q. What did you see when you got there?

25 A. I located the two sector commanders -- the lobby sector

1 commander and the fire sector commander -- as they were
2 outside the building, as were a number of firefighters
3 rigged in breathing apparatus.

4 Q. I just want to be clear about this: is it your
5 recollection that on the east side of the building there
6 were two sector commanders?

7 A. That's correct, the lobby and the fire sector. The fire
8 sector commander would normally be on the bridgehead,
9 but at the time the bridgehead had been removed from the
10 building because the fires had dropped below a safe
11 level.

12 Q. What would their tabards have said?

13 A. Their tabards would be red and yellow, and one would
14 have "lobby" as an insert on the rear of it and one
15 would have "fire" as an insert.

16 Q. As far as you can recall, at this stage was there
17 a sector commander rescue?

18 A. I cannot recall that.

19 Q. Whom did you pass the information about flat 81 on to?

20 A. Both the sector commanders were together at the time so
21 they both heard the information.

22 Q. Again, if you can't help with this just say so, but did
23 you form any impression at the time as to whether you
24 were telling them something they knew already or
25 something new?

1 A. I cannot remember.

2 Q. If you could be passed the jury bundle, please, and turn
3 within it to tab 14 and then to photograph 2. (Handed)
4 Do you recognise that as the east side of the building?

5 A. Yes, I do.

6 Q. To what extent is what one sees in that photograph
7 representative of what you saw when you first went round
8 to the east side of the building?

9 A. That's fairly representative of what I saw. I can't
10 remember the whole scene at the time.

11 Q. Did you form any impression about whether a bridgehead
12 had been set up outside the building in the area shown
13 in that photograph or whether it was in the process of
14 being set up?

15 A. No, the bridgehead had been set up because the entry
16 control officers were in place and BA crews had been
17 committed from my recollection.

18 Q. Do you recall seeing a black man on a balcony, high up
19 on the east side of the building, who attracted people's
20 attention by tying some material together?

21 A. Yes, I do.

22 Q. Can you remember whether he was already on the balcony
23 when you first went round to the east side?

24 A. I can't remember if he was already on the balcony but
25 I can remember seeing him there with sheets tied

1 together, trying to lower them down the side of the
2 building.

3 Q. If you look in tab 12 of the same bundle at page 23,
4 that's a photograph taken at 17.09. Does that refresh
5 your memory of what you saw on the balcony?

6 A. Yes, it does.

7 Q. So we've reached the point when you're on the east side
8 of the building and you've passed on the information
9 about flat 81. Did you then take up your mapping
10 duties, or did you carry out other tasks?

11 A. No, I would have then returned to my mapping duties 'cos
12 I'd carried out the task of passing the information on
13 about flat 81. So I needed to get the information of
14 who the sector commanders were, safety officers, and
15 where the appliances were parked.

16 Q. In that first half hour or so after you'd been round to
17 the east side of the building, what did you do by way of
18 mapping?

19 A. We'd normally go round and locate every appliance to get
20 their call sign -- it's easier to plot the call signs
21 within a vehicle rather than appliance name -- and also
22 to ensure that all the nominal roll boards would have
23 been collected from those appliances so we're aware of
24 who is on the fire ground. If there are any sectors put
25 in, as I say, who the sector commanders were per sector,

1 where they were, who the safety officers were.

2 I would then go back to Charlie Uniform 4, as that
3 was the initial command unit, and update the maps that
4 were on the board -- the headline board that would have
5 been in place at the time, ensure that's up to date, and
6 once that's done, then carry on back out, 'cos further
7 appliances would have almost certainly been turning up,
8 and appliances would be moved around the incident ground
9 to facilitate dealing with fires.

10 Q. If I could ask you to have a look at a passage in the
11 statement you made in November 2009. The statement
12 starts at page 246 of the statements bundle. Mr Clark
13 will pass you a hard copy. (Handed) If you look at the
14 first page of the statement, can you identify that as
15 your statement dated 6 November 2009?

16 A. Yes, I can.

17 Q. If you turn in it to page 249, the first substantive
18 paragraph, four lines long, refers to you seeing the
19 black man on the balcony. We've talked about that. The
20 next paragraph recalls steps being taken to make way for
21 an aerial ladder platform, and the court has heard
22 evidence and seen photographs of that. Then the
23 paragraph below that that starts "On walking across the
24 front of sector one", towards the end of it, the
25 penultimate sentence refers to matters you've just been

1 describing, and it says:

2 "I carried on towards CU4 and updated the headline
3 board with the names and roles of fire officers present
4 and either updated or added a two-dimensional image/map
5 of Lakanal. I had not been able, at this time, to
6 identify how many floors and how many flats made up the
7 building."

8 I wanted to ask you about that, because that passage
9 that I've just read out talks about not only the
10 presence of appliances and which London Fire Brigade
11 personnel were at the scene but also attempts to build
12 up an image or map of Lakanal, including how many floors
13 and flats it had.

14 A. That's correct.

15 Q. Had you been trying to do that to save time as you'd
16 been going round mapping the presence of appliances?

17 A. That would have been done at the same time. So what we
18 try and do is count the number of floors from outside
19 the building, but because of the make-up of the building
20 it was difficult to say what was the ground floor and
21 where the first floor started.

22 Q. Should we infer from what is said in the statement and
23 the evidence you've just given that you should have been
24 carrying out both of those tasks at the same time?

25 A. Yeah, by drawing the plan of the building, it gives us

1 a better idea of where the appliances are parked, and by
2 giving a two-dimensional map within the command unit, it
3 gives the incident commander a better, idea when they're
4 working away from the building, of what they're looking
5 at and what floors.

6 Q. The paragraph ended by saying:

7 "I had not been able at this time identify how many
8 floors and how many flats made up the building."

9 Is that something that, in your own mind, you had
10 wanted to do and attempted to do?

11 A. It's something that I would have done subconsciously.

12 Trying to do the mapping to go back to the unit, if you
13 can give a two-dimensional image with the number of
14 floors, it gives the incident commander a better idea of
15 what they're working on. So it would have been done
16 subconsciously at the time of doing it.

17 Q. Did you consider looking for any signs in or immediately
18 outside the building that might have assisted you to
19 identify how many floors and how many flats there were?

20 A. I would have probably looked outside the building, but
21 as the -- all the firefighters and sector commanders
22 were outside the building, I will not have been allowed
23 to enter the building to look for signs.

24 Q. We've heard evidence from a number of firefighters to
25 the effect that it is common, or not unusual, for there

1 to be signs at ground level in a building that give
2 an indication of where specific flat numbers can be
3 found in the building.

4 A. That is correct, yes.

5 Q. What I'll do in that case is show you three photographs
6 relating to such a sign at Lakanal and, to put it into
7 wider perspective, where it was within the building.
8 Then I'll ask you some questions about that.

9 Firstly, this is a close-up of the sign that I'm
10 going to ask you about. That was photograph 8.
11 Photograph 7 shows the sign in the setting where it was
12 to be found, which was in the lift lobby area at ground
13 floor level. If you take up your jury bundle, tab 14,
14 photograph 5, that is a view of the west entrance to the
15 building. If you go through the entrance that you can
16 see there, you can make your way into the lift lobby,
17 which we see on the screens in photograph 7.

18 So that is to give you an explanation of where the
19 sign that I showed you in photograph 8 was to be found.
20 So my first question is: did you, at any point in the
21 course of the incident, see that sign?

22 A. No, I did not.

23 Q. The next question is: in the light of the evidence
24 you've given about the areas of the building that you
25 could or could not go into, would it have been open to

1 you to have a look in that area at ground floor level?

2 A. No, it would not, because of the -- on that side, there
3 was falling debris and for safety, as I am not rigged in
4 the same breathing apparatus as required by the other
5 crews, I can't enter that part of the building.

6 Q. You told us how, after you'd carried out some initial
7 mapping, you returned to CU4 and updated the headline
8 board. After you'd done that, where did you go next?

9 A. I would have, if I remember rightly, gone back out into
10 the fire ground again to carry on further mapping.

11 Q. At any point up until now, has any senior officer given
12 you any specific instruction other than the instruction
13 to pass on the message about flat 81?

14 A. Not that I can remember.

15 Q. So you were carrying on your mapping duties that fell to
16 you because of being on the second command unit to
17 arrive?

18 A. That's correct.

19 Q. When you had been into the command unit to update the
20 headline board -- firstly, can you give any indication
21 of how long you had been away from the command unit
22 carrying out the mapping duties you described before you
23 first went back there?

24 A. I'm sorry, I can't remember that.

25 Q. Can you give any indication of what was up on the boards

1 in the command unit at the time?

2 A. No, I can't remember what would have been on the boards
3 at the time.

4 Q. If you can't remember the next couple of points then of
5 course, just say so, but do you remember seeing any flat
6 numbers up on the boards?

7 A. No, I do not.

8 Q. Do you remember there being any map of the building at
9 all on the boards at that time?

10 A. Again, I can't remember.

11 Q. Did there come a time when you had a conversation with
12 another person about flat 81?

13 A. I spoke to a police officer when I was out doing my
14 mapping of the area. He approached me to tell me about
15 flat 81.

16 Q. What did he say?

17 A. I believe he again told me that a lady had received
18 a call that people were in flat 81.

19 Q. What did you do as a result?

20 A. If I remember rightly, I went back to the command unit
21 to tell the command unit crew again about the people who
22 were in flat 81.

23 Q. Were you asked to do anything specifically after you'd
24 passed that information to command unit 4?

25 A. I can't remember.

1 Q. Did you speak to anyone about flat 81 after you told
2 command unit 4?

3 A. I can't remember off the top of my head.

4 Q. If I could help you then by taking you to what you said
5 in your statement at page 250. The paragraph at the
6 very top of the page describes a conversation with
7 a police officer and the fact that you returned to
8 command unit 4 and passed the information on to the
9 incident commander. Then the second paragraph says
10 this:

11 "From CU4, I returned again to sector 3. I saw two
12 sector commanders in conversation with each other. I do
13 not know who they were but their roles were the fire
14 sector commander and the lobby sector commander. They
15 were both of station manager rank. I approached them
16 and tried to interrupt but was told to wait. I said,
17 'No, you wait', and explained that the incident
18 commander wanted them to be aware that there were people
19 still in flat 81 on the 11th floor."

20 Does that refresh your memory?

21 A. Yes, it does.

22 Q. Should we understand from your statement that there were
23 two separate occasions when you told the fire sector
24 commander and the lobby sector commander about flat 81?

25 A. Yes, that would have been correct.

1 Q. And it was the same people who were fire sector
2 commander and lobby sector commander on each occasion?

3 A. I'm unable to recall if it was the same people or
4 whether they changed ranks.

5 Q. If we continue in the statement, it says, the next
6 paragraph:

7 "Back at CU4, I was then tasked by the incident
8 commander or by Del..."

9 That's Watch Manager Best, isn't it?

10 A. That's correct.

11 Q. "... to find out what BA crews had been committed, where
12 they were, what locations had been searched and on what
13 floors fires were being fought. On returning to
14 sector 3 to obtain this information, I was aware that
15 the bridgehead had returned into the building itself."

16 A. That's correct.

17 Q. Then there came a point when you saw casualties being
18 brought out of the building and also a firefighter who
19 was having difficulty breathing and was in some
20 distress; is that right?

21 A. That's correct, yes.

22 Q. Then at around 1900 hours, or shortly after that, you
23 were given a different role, which was to establish
24 which flats had been searched and to obtain details of
25 fatalities and casualties?

1 A. That's correct, yes.

2 Q. I won't ask you further questions about the events of
3 the day but I would like to ask you, in particular in
4 relation to the time when you were mapping officer,
5 about certain features of Lakanal House and whether you
6 gained knowledge of them at any point whilst you were
7 mapping officer.

8 Firstly, did you become aware that there were no
9 central corridors on the even-numbered floors?

10 A. No, I did not.

11 Q. Did you become aware that the flats were maisonettes?

12 A. Only later in the evening, when I took on the second
13 control after about 17 -- 1930 hours.

14 Q. Did you become aware that on the upper floor of the
15 flats they extended the full width of the building, so
16 having windows on both the east and west sides?

17 A. Again, I become aware of that later in the evening when
18 I spoke to -- I believe it was a local authority liaison
19 officer or someone who was aware of the building, who
20 explained it. It actually took a while for them to
21 explain it. They had to draw a picture in the command
22 unit to explain it to us, to get us to understand.

23 Q. I've put up on the screen photograph 44, which is taken
24 from the corner of Dalwood Street and Sedgmoor Place on
25 the west side of the building. If you look at it, you

1 can see that there are balconies on alternate floors.
2 My question is: did you, at any point whilst mapping
3 officer, become aware that those balconies provided
4 escape routes to the ground floor via the central
5 staircase?

6 A. No, I did not.

7 Q. When you walked round the building as mapping officer,
8 did you think about what those balconies were there for?

9 A. As I walked round the building, I can't remember if
10 I thought about them or whether they looked like
11 balconies.

12 Q. If I show you a zoomed-in photograph taken from the same
13 position. This is photograph 45. You can see a white
14 door at the end of the balcony in the area of the
15 central staircase. Do you see that?

16 A. Yes, I do.

17 Q. Do you recall whether you noticed those doors at the
18 time whilst mapping officer?

19 A. No, I do not.

20 Q. Do you recall being part of or overhearing any
21 discussion about the purpose of those balconies?

22 A. No, I do not.

23 Q. I've put up now on the screen an image that represents
24 what the west side of the building looks like from
25 ground floor level, which shows the floor numbers but

1 not the flat numbers. If I now place over it the
2 correct flat numbers by reference to the windows, and
3 ask you this: whilst you were mapping officer, did you,
4 at any stage, begin to build up a mental picture of
5 where flats were in the building that looked like that?

6 A. I cannot remember.

7 Q. Were you aware of flat numbers being mentioned in
8 addition to flat 81?

9 A. Yes, I was.

10 Q. Before I ask you if you can remember which flat numbers,
11 can you help us with how many flat numbers you were
12 aware of?

13 A. There was only a couple that I was aware of: flat 79 and
14 flat 65.

15 Q. Whilst you were mapping officer, do you recall whether
16 you were aware or worked out where flat 65 was in the
17 building?

18 A. I seem to remember being pointed that flat 65 from the
19 outside of the building, where it initially started, but
20 I can't remember who pointed it out to me.

21 Q. Do you remember working out or becoming aware of where
22 flat 81 was?

23 A. I would have become aware later on in the evening when
24 we were trying to draw the -- the picture, after 7.30 in
25 the evening, on the other unit.

1 Q. So not whilst you were mapping officer?

2 A. No.

3 Q. Is the same the case for flat 79?

4 A. Yes, it is.

5 Q. My final question is this: looking back over your
6 involvement on the day of the fire and specifically the
7 time when you were mapping officer, what single
8 additional thing do you think would have most helped you
9 to carry out that role?

10 A. Being able to get hold of plans for the building
11 earlier.

12 Q. Thank you very much. Those are my questions, but others
13 may have some as well.

14 Questions by the Coroner

15 THE CORONER: Mr Paffett, perhaps you can just tell me: you
16 went to speak to the fire sector commander and the lobby
17 sector commander to pass on the message about flat 81.
18 If either of them had said to you: "Well, where do we
19 find flat 81? You're acting as the mapping officer.
20 Where is it?" what would you have done?

21 A. I wouldn't -- they probably wouldn't have asked me where
22 flat 81 was 'cos mapping's normally something we do for
23 appliances. We're getting an idea of the picture of the
24 building outside. So unless we have plans for the
25 building from the beginning, it would be very difficult

1 for to us pinpoint where a certain flat is within the
2 building.

3 Q. So no-one would have had any curiosity and asked you, as
4 the person who was undertaking mapping?

5 A. I'm afraid I can't answer that question on their mind.

6 THE CORONER: When you were walking round and looking at the
7 building, did you ask yourself: "Well, I wonder what the
8 escape routes are from these flats for the occupants?"

9 A. No, I did not.

10 THE CORONER: That didn't occur to you?

11 A. No, it did not.

12 THE CORONER: Okay. Mr Hendy?

13 Questions by MR HENDY

14 MR HENDY: Thank you, madam.

15 Mr Paffett, my maim's Hendy. I represent some of
16 the bereaved families. Are you -- or were you then --
17 BA trained?

18 A. I am BA trained even though I don't wear breathing
19 apparatus at this point.

20 Q. As I understand it, the principal task of a mapping
21 officer is to establish where all the appliances are
22 parked; is that right?

23 A. That is correct, yes.

24 Q. The purpose of the drawing of the two-dimensional map of
25 the building was, you tell the jury, in order to show

1 better where the appliances were parked; am I right?

2 A. Yes, that's correct.

3 Q. If you're drawing a two-dimensional map of the building,
4 why do you need to know the details of the floors?

5 A. It would help the incident commander if he knew which
6 floors -- how many are in the building, especially when
7 we're doing messages from the incident, and also on the
8 sectorisation of the building, they're aware of where
9 the building's been sectorised for the incident
10 commander's benefit.

11 Q. Forgive me for putting it so crudely, Mr Paffett, but
12 this is rubbish, isn't it? Why on earth would you want
13 to know numbering of the floors in order to determine
14 where the appliances were at ground level?

15 A. We take it as part of our responsibility to draw
16 a two-dimensional map for the incident commander.
17 Incident commanders prefer to have one on the board,
18 even if that is done while we go round, rather than
19 someone separate going round to draw a map.

20 Q. Did you update your headline board with the details of
21 the floors?

22 A. The headline board does not have the details of the
23 floors on it.

24 Q. Just look at page 249, please, and the bottom paragraph,
25 four lines up, the line that begins:

1 "Saw that a silver car was on its side in
2 Dalwood Street."
3 Do you have that line?
4 A. Yes, I do.
5 Q. "This is pictured in SB/1. I returned to CU4 and
6 updated the board with details of floors within
7 Lakanal."
8 Why do you tell the jury that you didn't update the
9 board with details of the floor?
10 A. That wouldn't have been the headline board. That would
11 have been the plan board that was next to the headline
12 board. We have two A0 size boards fitted to the unit.
13 One we would draw on and one is the headline board.
14 Q. Right. So you have the headline board and a board next
15 to it, on which you've put the details of the floors,
16 right?
17 A. I would have put the floors when I know them.
18 Q. When you say "details of the floors", what detail did
19 you put on that board?
20 A. I cannot remember.
21 Q. Did you put the numbers of the floors?
22 A. I cannot remember.
23 Q. Did you put the numbers of the flats on the floors?
24 A. Again, I cannot remember.
25 Q. Did you put where the fires were on the floors?

1 A. I would have tried to put them on the floor if I was
2 able to determine how many floors were in the building.

3 Q. I'd like you to look at a couple of sentences of
4 a statement of a fire officer who's going to give
5 evidence soon. This is at page 669, and it's in the
6 witness statement of Mr Gary Dobson, who was then
7 director of operational policy and training based at
8 brigade headquarters and attended the fire at
9 Lakanal House. At 669 --

10 THE CORONER: Sorry, could you just wait a moment, Mr Hendy.
11 Mr Clark's finding the page.

12 MR HENDY: Of course. I'm so sorry, madam. (Handed) At
13 669, in the bottom part of the page, he says:

14 "At approximately 1900 hours I returned to the
15 command unit, where I met with Assistant Commissioner
16 Turek, who had assumed command of the incident, and we
17 discussed the overall plan using the decision-making
18 model and ensured we had sufficient resources. I was
19 concerned that informational progress of firefighting
20 and search and rescue operations, particularly in
21 relation to the fire survival calls, was not displayed
22 on the command unit."

23 That's command unit 4:

24 "At this point, I could hear conversations from
25 outside the command unit amongst London Fire Brigade

1 personnel confirming that persons were still trapped and
2 previous information regarding fire survival calls. As
3 a result, I advised the incident commander to set up
4 a second command unit with specific responsibilities for
5 coordinating information relating to firefighting,
6 search and rescue, and persons still accounted for."

7 Do you tell the jury either that he's wrong or that
8 you had no responsibility for recording information
9 relating to firefighting, search and rescue, and persons
10 still unaccounted for whilst you were the mapping
11 officer?

12 A. That wouldn't have fallen into the role of the mapping
13 officer. The role of the mapping office is primarily to
14 do a two-dimensional plan. Yes, in hindsight, it would
15 have been good information to have at the time, but
16 I wouldn't have had all that information because they
17 cover a vast area, and I'm not privileged to a lot of
18 the conversations that go on at the time. Mapping can
19 take up to 20 to 30 minutes on a fire ground. It's not
20 a couple of minutes job.

21 Q. Mr Maxwell-Scott asked you about the sign in the lift
22 lobby of the flats which showed the numbers of the flats
23 on the floors of Lakanal House. You told the jury you
24 didn't see that and that you couldn't access the
25 building because of falling debris and because you, as

1 I understood it, weren't wearing breathing apparatus; is
2 that right?

3 A. That's correct; command units don't carry breathing
4 apparatus.

5 Q. There was a lobby commander there. Can we take it that
6 you didn't trouble to ask him whether you could access
7 that board, or indeed whether he could access that board
8 or send somebody else to access that board?

9 A. The lobby commander was not on that side of the
10 building. He was on the other side of the building.

11 Q. Right. Let's put it more generally then. Can we assume
12 that you didn't ask anybody to go and look at that board
13 on your behalf?

14 A. No, I did not.

15 Q. Do you have cameras on board the command unit?

16 A. We do now.

17 Q. Did you in July 2009?

18 A. No, we did not.

19 Q. I think the last matter I want to ask you about is this:
20 if you would be kind enough to look at the new documents
21 which have been provided overnight. I don't know,
22 Mr Clark, whether they've gone into the advocates'
23 bundle yet, but it will be right at the end of volume 4
24 and I'd like to look at page 1676.

25 THE CORONER: I don't have a set yet, actually. If someone

1 could let me have one, I'd be grateful. (Handed)

2 MR HENDY: Mr Paffett --

3 THE CORONER: Sorry, if I could just stop you for a second,

4 Mr Clark has a copy for me.

5 MR HENDY: I'm sorry, madam. 1676.

6 THE CORONER: Yes, thank you.

7 MR HENDY: Mr Paffett, this is a risk assessment carried out

8 by the London Fire and Emergency Planning Authority

9 in October 2006. I'll confirm it with you, but I don't

10 suppose for a moment you've seen this document before,

11 have you?

12 A. No, I have not.

13 Q. Just look at the last box on page 1676, where the person

14 who has filled in this form has written:

15 "Residential block of 14 floors. 14 maisonettes on

16 floors 1, 3, 5, 7, 9, 11, 13. All maisonettes over two

17 floors."

18 Can we take it that if you had been aware of that

19 information, it would have assisted you as mapping

20 officer?

21 A. Yes, it would.

22 Q. Thank you.

23 THE CORONER: Thank you. Mr Dowden.

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Questions by MR DOWDEN

MR DOWDEN: Yes, good morning. I ask questions on behalf of Mr Francisquini. You told us that you met with Mr Niblett early in the incident and received information about flat 81, and you'd received that information from a lady that he was with at the time. Do you recall that?

A. Yes, I do.

Q. Given that you had no idea as to where the floors were, did you not think to ask the lady whether she was able to give you some assistance in that area?

A. At the time, I wouldn't have, but in hindsight now, that would have assisted. But I felt that getting the information across to the incident commander, who I believed might have been aware of the flats in the first place -- but in hindsight that would have helped.

Q. Didn't it cross your mind to ask the question as to how close to the fire flat 81 was?

A. No. I'm sorry, I can't remember that point.

Q. En route to the fire, did you know which was the flat which was initially on fire?

A. On our call slip -- it would have said a flat number on the call slip, and I was aware it was flat 65.

Q. Did you know which floor that was on?

A. No, I did not.

1 Q. Did you attempt to find out which floor that flat was
2 on?

3 A. I did find out that it was on the 9th floor.

4 Q. At what stage?

5 A. That would have been when I was at the incident.

6 Q. Well, at what time when you were at the incident?

7 A. I can't recall that.

8 THE CORONER: Thank you. Ms Al Tai?

9 MS AL TAI: No questions, thank you.

10 THE CORONER: Mr Compton? Mr Walsh?

11 MR WALSH: No, thank you, madam.

12 THE CORONER: Thank you. Members of the jury, do you have
13 any questions?

14 Questions by the Jury

15 THE FOREMAN OF THE JURY: Thank you, Madam Coroner, we do
16 have three. We were just wondering: returning to the
17 command unit after you'd completed your initial mapping
18 of the site, did you happen to radio Watch Manager Best,
19 who was standing next to the incident commander, to let
20 him pass on the fact to the incident commander that the
21 mapping had been done?

22 A. No, I wouldn't have done that because mapping is
23 a constant thing throughout the incident. We will
24 continuing doing mapping -- it's not just go round once.
25 Once you've updated the board, you will go out and do it

1 again, so it's constant throughout the incident.

2 THE FOREMAN OF THE JURY: Sorry, I'm not sure I heard that.

3 THE CORONER: Could you repeat your answer, please?

4 A. Yeah, sorry about that. Mapping's a constant job that

5 we do throughout the incident. We wouldn't just do it

6 once and then leave it; we would go back out again,

7 check areas, because situations change, appliances have

8 been moved from locations and, as pointed out, a little

9 bit later on the bridgehead did actually go back into

10 the building. So again, that would be part of the

11 mapping, to identify where that had gone to.

12 THE FOREMAN OF THE JURY: Okay. I understand it's a fluid

13 process, always changing in its nature, but at any time

14 is the incident commander made aware or brought to the

15 command unit to look at the mapping that's been done?

16 A. The incident commander will generally be brought to the

17 command unit. Unless they deem that it's necessary for

18 them to go out and look at the fire ground, they will go

19 to the command unit and work from the command unit, so

20 they will be aware that the mapping's been updated.

21 THE FOREMAN OF THE JURY: But they will need to do that off

22 their own back rather than being told where things are

23 at by the command unit?

24 A. Sorry?

25 THE FOREMAN OF THE JURY: The incident commander would need

1 to make the decision himself that it was perhaps time to
2 go to the command unit rather than you summoning him,
3 for instance?

4 A. Generally, at incidents of six pumps and above, we would
5 always try and get the incident commander to go to the
6 command unit and to work from the command unit so they
7 were aware of the information that's coming in and that
8 the maps have been updated.

9 THE FOREMAN OF THE JURY: Okay, thank you. We've heard how,
10 in your case, you are actually trained as a BA wearer.
11 I do realise this might not be the case for all mapping
12 officers. As a qualified BA wearer and the fact that
13 you were mapping officer in this account, were you
14 unable to enter the building because it was against
15 a policy or procedure to do so, even though technically
16 you could have?

17 A. A mapping officer wouldn't wear a breathing apparatus at
18 any point during the incident. It's not in our role to
19 wear breathing apparatus, to enter buildings to carry
20 out mapping tasks. On the command unit, we wouldn't
21 wear breathing apparatus at all at an incident.

22 THE FOREMAN OF THE JURY: I'm just trying to understand the
23 reasons why this is not an option even available to you,
24 in that you say it's not part of the role and that
25 role's defined by policy or procedure as: "This is not

1 something we do"? Is that correct?

2 A. It is part of the policy that we do not do it. For
3 someone to wear breathing apparatus, they have to go in
4 as a minimum team of two. A mapping officer works as
5 one, so we would be breaking our procedures and it is
6 not a requirement of the command unit crew to wear
7 breathing apparatus and enter a building to map it. It
8 just wouldn't be viable to enter a building that is
9 smoke-filled to try and map. It take a long time and
10 you wouldn't be able to identify, in a smoke-filled
11 environment, what doors are doors by standing in the
12 corridor. You would have to go along and look at every
13 door from two or three inches away in a smoke-filled
14 building.

15 THE FOREMAN OF THE JURY: Thank you very much.

16 THE CORONER: Yes, thank you very much, Mr Paffett. Thank
17 you for coming and thank you for the evidence that
18 you've been able to give us. You're welcome to stay if
19 you would like, but you're free to go if you would
20 prefer.

21 A. Thank you very much.

22 THE CORONER: Thank you.

23 (The witness withdrew)

24 THE CORONER: Yes, would it be sensible to have a break now,
25 perhaps?

1 MR MAXWELL-SCOTT: Yes, I think so. There are five
2 photographs to be inserted into the jury bundles, if
3 Mr Clark could hand those out. They're to go in the
4 back of tab 14.

5 THE CORONER: Okay, yes, that would be very helpful. Thank
6 you very much. Tab 14?

7 MR MAXWELL-SCOTT: Yes.

8 THE CORONER: Yes. (Handed) Members of the jury, if you
9 would like to have a break now, if you could be back by
10 about 11.25. Thank you. Do leave your papers on your
11 desks if you want.

12 (11.13 am)

13 (A short break)

14 (11.25 am)

15 THE CORONER: Yes, do sit down. I understand that the
16 members of the jury have another question they'd like to
17 put to Mr Paffett. So Mr Paffett, would you mind just
18 coming back? I'm sorry about that.

19 (The witness returned)

20 THE CORONER: Do switch the microphone on, please,
21 Mr Paffett, thank you.

22 (In the presence of the Jury)

23 THE CORONER: Thank you. Members of the jury, I understand
24 that you have another question for Mr Paffett. He had
25 not left the building so he's here to answer your

1 further question.

2 THE FOREMAN OF THE JURY: Thank you very much for coming
3 back, Mr Paffett. Mr Dowden asked you earlier if you
4 knew which floor the fire was on and you've said that
5 you did not find that out until later. However, in your
6 witness statement you said:

7 "A call came through about a fire at Lakanal House
8 on the 9th floor."

9 We would like to ask which information you were
10 aware of, either when the call came through or en route?
11 We'd just like to clarify this point.

12 A. I would have looked at the call slip to find out roughly
13 where the address is. Because there's appliances on
14 there and we're not an immediate response to that first
15 thing, we don't always take note of the floor the fire's
16 on, because I'm looking at the address and bits and
17 pieces, so -- I remember being told -- the 9th floor
18 being pointed out on the fire ground. I can't remember
19 on the call slip, even if it is mentioned in the
20 statement.

21 THE FOREMAN OF THE JURY: I know that you perhaps don't
22 recall specifically, but would it be normal for that
23 information to actually be on the initial call slip, and
24 that it may have been there and you didn't notice it
25 because you weren't looking for it?

1 A. It would be normally -- if the caller has specifically
2 told them where the flat and the floor is, it would be
3 normal for it to be on the call slip. I would
4 specifically look for the address rather than a specific
5 floor in the flat. I would be looking at the road that
6 I'm going to to get the vehicle there, so I wouldn't
7 necessarily see that on a call slip.

8 THE FOREMAN OF THE JURY: Thank you very much.

9 MR WALSH: Madam, I wonder, since the question has very
10 properly been asked in relation to the statement and
11 what he said in the statement, I think it genuinely
12 might assist him if he be referred to page 246 of his
13 statement to see whether he could clarify from that.

14 THE CORONER: Yes, of course. Could we put that on the
15 screen, please? Thank you. Yes, can you see it on your
16 screen, Mr Paffett?

17 A. Yes.

18 THE CORONER: I think you're looking at the last main
19 paragraph on that page. You might want to start reading
20 from about halfway down, where it says:

21 "My duty effect effectively started ..."

22 A. Yes, I can see that on the statement. It does say the
23 9th floor.

24 THE CORONER: All right. Do you want to amplify or amend
25 your answer in any way?

1 A. I -- if I said it in the statement, that means I would
2 have read it, but I wouldn't have remembered everything
3 that goes on at the beginning on the way to the
4 (Inaudible) so I probably did read -- if it's in the
5 statement, I would have read it from my call slip. But
6 again, as I say, I would have then gone on to the fact
7 it's more important to get the vehicle to the road that
8 I need to be in and what's on the footnote of the call
9 slip, which might actually be an RVP that we need to go
10 to a certain place -- sorry, rendezvous point at
11 a certain point. And again, I remember being told on
12 the fire ground it was on the 9th floor and the flat,
13 because somebody pointed out to me on the 9th floor.

14 Further questions by the Coroner

15 THE CORONER: Members of the jury, does that answer your
16 question? Thank you very much. Perhaps we could just
17 call up page 249 of Mr Paffett's statement. I'm looking
18 at the last paragraph on that page. Can you see that
19 sufficiently on the screen, Mr Paffett?

20 A. Yes, I can, yes.

21 THE CORONER: Towards the bottom of that paragraph -- and
22 you've already told us about this and you've been taken
23 to this passage already -- you say:

24 "I returned to CU4 and updated the board with
25 details of floors within Lakanal."

1 A. Yes.

2 THE CORONER: Could you describe to me how you did that?
3 What did you actually draw or write on the board?

4 A. I can't remember off the top of my head.

5 THE CORONER: Did you draw a little box which represented
6 a building?

7 A. It would have been a rectangular box to representative
8 a building but I can't remember if -- what sort of
9 things I put in. It might have been a few lines and
10 then gone back to try and identify more floors.

11 THE CORONER: How were you going to record details of
12 floors, which is what it says in your statement?

13 A. I'm sorry, I can't answer that.

14 THE CORONER: When you wrote your statement, you must have
15 had some idea what you meant?

16 A. Yeah, that were three and a half years ago. I can't
17 actually remember that point of what was mentioned in
18 the statement. I didn't even know it's in there(?).
19 I cannot recollect it.

20 THE CORONER: Because I just remain very puzzled as to what
21 is the purpose of writing on the board details of floors
22 in the way that you've been able to describe to us.
23 I just don't have a mental picture of what you actually
24 wrote on the board or what its purpose was.

25 A. I would try and write on the board information that

1 HARRY SIMONS (affirmed)

2 THE CORONER: Thank you, Mr Simmons. Do sit down and help
3 yourself to a glass of water. Do keep your voice up so
4 we can hear what you say. If you direct your answers
5 across the room towards the jurors, that will help them
6 to understand and hear what you're saying and also keep
7 you close to the microphone.

8 A. Yes, madam.

9 THE CORONER: Mr Maxwell-Scott, who is standing, will ask
10 questions initially on my behalf, and then there may be
11 questions from others. Thank you.

12 Questions by MR MAXWELL-SCOTT

13 MR MAXWELL-SCOTT: Good morning, Mr Simmons. Could you give
14 the court your full name, please?

15 A. My full name is Harry Frederick Simmons.

16 Q. I think as you're aware you are the first witness we are
17 hearing from who worked at brigade control, and I'm
18 going to be asking you questions in general terms about
19 the operation of brigade control and asking you about
20 some policies, practices and training and then finally
21 about the events of 3 July itself from the brigade
22 control perspective. When I ask you about policies and
23 practices and training that was being given at the time,
24 the questions will all relate to the period before
25 3 July 2009. Do you understand?

1 A. I do.

2 Q. Firstly, if we could start with some background about
3 yourself. When did you join the London Fire Brigade?

4 A. November 1969.

5 Q. What position did you initially take up?

6 A. That of a control officer at Stratford control.

7 Q. So that is a control officer working, am I right, in the
8 control room at brigade control?

9 A. In 1969, we had four control rooms in the
10 London Fire Brigade, not the one we had when this
11 incident occurred.

12 Q. But with that distinction, my question is correct, is
13 it? You worked --

14 A. It is indeed.

15 Q. You worked initially from 1969 as a control officer in
16 a control room?

17 A. Yes.

18 Q. Is it right that over the years you were promoted and
19 that by July 2009 you were the operations manager, one
20 of them, at brigade control?

21 A. Yes, one of four in charge of watches.

22 Q. When did you take up that position?

23 A. Initially at our control room at Lambeth, in around
24 about 2000 -- sorry, around about 1992. I was in charge
25 of the Green Watch and -- for all that time, apart from

1 about six years when I was seconded to a support group
2 within the control, and special operations group.

3 Q. When did you return from that secondment?

4 A. 2006.

5 Q. You talked about being operations manager. I've seen
6 references to various titles or job descriptions.

7 I just wanted to ask you about each of them to see if
8 they were, in effect, all the same thing. Firstly, was
9 the watch manager the same thing as the operations
10 manager?

11 A. It was indeed. From around about 1992, without changing
12 position, I became senior controller, control commander,
13 operations manager, without an upgrade or change in
14 status.

15 Q. I think you mentioned there one of the other ones I was
16 going to ask you about, which was the title of control
17 commander. Was that the same thing?

18 A. It is the same thing, yes.

19 Q. Then, finally, in some of the radio traffic there's
20 reference to the officer of the watch. Is that another
21 name for the same thing?

22 A. That was a generic term that was used by the watch
23 manager or one of the team leaders -- or assistant
24 operations managers they're called now -- that performed
25 a duty of supervising the control room and making sure

1 it was running properly.

2 Q. So the term "officer of the watch" did apply to you, but
3 not just to you; is that right?

4 A. Not just to me. It was depending on who was sitting in
5 one of the supervisory consoles in the control room.

6 Q. If I ask you, then, to take up the advocates' bundle,
7 file 4 and turn in it to page 1462. (Handed) I've put
8 this page up because it's the front cover of a report
9 prepared by the London Fire Brigade dated November 2012
10 into the role and actions of the LFB control during the
11 Lakanal House fire. Firstly, can you tell the court
12 whether or not this is a document you've seen before?

13 A. I have seen this document before but only recently.

14 Q. Having introduced it, may I firstly take you to a table
15 on page 1369. This is intended to represent the staff
16 and management structure in LFB control back
17 in July 2009, as I understand it, and so towards the
18 bottom of it, it spreads into four separate columns, and
19 that section of the table is described as "control room
20 watch-based staff posts". As I understand it, you are
21 the green control commander to the right-hand side of
22 the page; is that right?

23 A. That's correct.

24 Q. Because you were the control commander -- or operations
25 manager or watch manager -- for the Green Watch?

1 A. That's correct.

2 Q. Then you managed, in the control room, during your
3 watch, seven senior control officers; is that right?

4 A. Yes, that's correct.

5 Q. And they had some supervisory responsibilities; is that
6 right?

7 A. Yes, they did. They worked with me to ensure that the
8 control room ran as efficiently as possible.

9 Q. Then there were, in addition, 16 control officers?

10 A. That's correct, yes.

11 Q. Were all 16 based in the control room, or were some of
12 them elsewhere?

13 A. Two of the senior controllers were detached on a rota
14 basis to our fall-back control for resilience purposes.

15 THE CORONER: Sorry, could you say that again?

16 A. Yeah. Two of the senior control officers, on a daily
17 basis, were detached to our fall-back control at the
18 time at Stratford for resilience purposes, so we could
19 maintain a control in the event of having to relocate
20 due to systems failures or any other event.

21 MR MAXWELL-SCOTT: If I take you to what it says immediately
22 underneath the chart:

23 "Chart 1 shows the authorised establishment in
24 control ..."

25 THE CORONER: Sorry, could I just stop you there,

1 Mr Maxwell-Scott. Would it be possible to increase the
2 size of the print a little bit so the jurors can read it
3 a little more easily? Thank you. That's very helpful.
4 Thank you.

5 MR MAXWELL-SCOTT: So paragraph 23:

6 "Chart 1 [which is the chart we've just been looking
7 at] shows the authorised establishment in control (ie
8 watch-based staff), together with the senior management
9 structure at the time of the Lakanal fire. Each watch
10 had an establishment of 24, excluding the control
11 commander. The target staffing level was 14 staff per
12 watch in control at 2GVP with two senior control
13 officers always at a fall-back control located at
14 Stratford; therefore a total target of 16 staff. This
15 difference between the working establishment and target
16 staffing was to allow for staff leave, sickness and
17 other absences."

18 A. That's correct.

19 Q. So I'm just trying to understand that. There were 24
20 people who were employed as members of Green Watch but
21 16 of them on duty in the course of any one watch?

22 A. That's correct. It was a target figure of 14 at the
23 main control room and two at the fall-back control. The
24 target figure was what we always aimed to try to
25 maintain. If there was not many people on leave, we'd

1 have more. If there was the total leave allocation
2 taken and sickness, we would be aiming for a target
3 figure of 14 at the main control.

4 Q. So on any one Green Watch, you would be meant to be
5 there and there would be eight people on average who
6 were not there because of leave or sickness or other
7 absences, and then there would be two people who were on
8 duty but at a different location in Stratford?

9 A. That's correct.

10 Q. If we go back to the chart, we can see that as with
11 other staffing arrangements within the
12 London Fire Brigade, there were four watches of four
13 colours: red, white, blue and green. You and your three
14 fellow control commanders reported to two senior
15 operations managers in a line management chain; is that
16 right?

17 A. That's right.

18 Q. Were those senior operations managers based at the same
19 brigade control location as you?

20 A. They were, but basically they were conditioned to day
21 duties with a call out for evenings and weekends on
22 incidents of note.

23 Q. Then the line management chain led up through
24 a principal operations manager to an assistant
25 commissioner?

1 A. That's correct.

2 Q. If I ask you, then, about the physical set up in the
3 control room. If you could take up the jury bundle at
4 tab 14 and turn in it towards the back of it, you will
5 find five photographs starting on page 24, which
6 I understand are photographs of the control room.

7 (Handed) If you take a moment to look at those, do you
8 recognise those as photographs of the control room as it
9 was in around July 2009?

10 A. Yes, exactly as it was in July 2009.

11 Q. I'm going to put on the screens a plan. This is at
12 page 227 in the advocates' bundles. As I understand it
13 this is a plan that was annotated by one of your staff,
14 Deborah Real, and she marked on it places where some
15 of -- well, herself, "DR", and then some of her
16 colleagues were sitting on 3 July 2009.

17 Looking at the plan, where it says "control room",
18 is that a plan of what we see in these photographs?

19 A. It is indeed.

20 Q. Looking at the plan, there's a box indicating a room
21 which says "control commander". Was that your office,
22 in effect?

23 A. It is basically the control office that -- when I was
24 able to do routine admin work or we were able to do
25 routine admin work, we'd go to that control room -- that

1 room.

2 Q. When you were on duty generally -- so not specifically
3 the incident on 3 July -- to what extent would you be
4 based in the control room and to what extent in your
5 office?

6 A. Most of the time I would be out in the control room,
7 because we were, the vast majority of the time, working
8 at our target figure, and the control commander was
9 a working member of the team and would perform the role
10 and sit in the centre of the middle section at the top
11 of the plan.

12 Q. Can you, by reference to the photographs, draw our
13 attention to where that was and also explain about the
14 computer screens that staff are looking at? So firstly,
15 which is the best photograph to indicate where you would
16 have sat as control commander?

17 A. The page marked 25.

18 Q. Would you have sat at the desk in the foreground of the
19 picture?

20 A. I would have sat in the middle of the desk at the
21 foreground -- in the foreground.

22 Q. That's a photograph that also illustrates the computer
23 screens available on desks. Are there two per operator?

24 A. There were three screens per operator.

25 Q. Thank you. Can you explain to the members of the jury

1 what they were for, what information they displayed?

2 A. In front of each supervisor there was -- the middle
3 screen was the mobilising screen, the screen in which
4 all the information relating to calls, information from
5 callers, was typed and the main section of our working
6 environment. The screen on the --

7 Q. Just pausing there, that is a screen, in other words,
8 which records whatever the operator types on their
9 keyboard?

10 A. That's correct.

11 Q. Thank you.

12 A. The screen immediately to the left is the switchboard,
13 the touch-screen switchboard, which all calls into and
14 out of the control room are made from.

15 Q. Then what about the one to the right?

16 A. The screen on the right is a mapping system, basically
17 a geographia that's placed on the system that we can
18 identify where the thoroughfares are. It also forms
19 a function -- that screen also forms a function of being
20 able to gain other information, access to the internet
21 and the internal intranet system and email system.

22 Q. Unless there's anything else you want to add about the
23 screens and equipment on individual control operators'
24 desks, I was then going to ask you about the big screen
25 on the wall.

1 A. The big screen on the wall is the diagrammatic map of
2 the London Fire Brigade area, indicating the approximate
3 location of fire stations and the basics of the
4 appliances attached to that station or at that station
5 at a specific time.

6 Q. Just to assist the members of the jury, photograph 28
7 seems to show it best.

8 A. To the right of the map is a list of the incidents being
9 attended by the brigade at any given time.

10 Q. That's all computerised, is it?

11 A. That's all computerised, running off the main computer
12 system.

13 Q. Unless there was any further point you wanted to make
14 about what's shown in those photographs at this stage,
15 I was going to invite you to put them away and then
16 I was going to ask some questions to put the work load
17 of the control room into context. I think the most
18 convenient way of doing this is to ask you to look at
19 page 1368, which is back in the control report. What we
20 see there, on the top half of the page, is a section
21 headed "Overview of functions of control" and it says
22 that the London Fire Brigade control was located at
23 an address at the time in Docklands, and:
24 "... the work load of the control can be summarised
25 as dealing with:

1 "999 emergency calls. In 2009, control answered
2 224,763 emergency calls, including duplicate calls for
3 the same incident, and mobilised resources to 124,441
4 incidents."

5 Are you able to say whether that is representative
6 of the years before 2009 as well?

7 A. I would say it's roughly representative of normal years.

8 Q. From that, I draw the inference -- correct me if I am
9 wrong -- that on average there are two 999 calls per
10 incident, which is to be compared with what happened in
11 the Lakanal House fire, which generated 60 999 calls?

12 A. It's very difficult to quantify but you can roughly say
13 two calls to every one incident.

14 Q. So the 60 for the Lakanal House fire gives an indication
15 of its size and complexity in comparison with an average
16 incident?

17 A. Yes, I think it does, but it was the type of call
18 that -- 60 quite difficult calls as opposed to simple,
19 straightforward calls.

20 Q. I will come to that in a moment. Then also on this
21 page, we see that there were approximately 400,000
22 operationally urgent calls a year. Can you explain very
23 briefly what they are?

24 A. Operationally urgent calls are the calls that come into
25 the control room, basically, supporting incidents,

1 the -- confirming availability of vehicles, officers,
2 information from other authorities -- for example, from
3 the Metropolitan Police -- road closures, general
4 information that comes through the 24-hour control
5 point.

6 Q. Then 20,000 or so administrative calls a year?

7 A. Yes, the Fire Brigade maintain a switchboard Monday to
8 Friday for admin purposes but in the evening and
9 weekends and bank holidays that gets passed on to the
10 emergency operators in the control room.

11 Q. If I could then ask you to turn in the same document to
12 page 1390 because I'm then going to ask you about fire
13 survival guidance calls. The table at the top of the
14 page, table 1, summarises the number of calls where fire
15 survival guidance was given in each of the five years in
16 the period 2005 to 2009. The text to accompany the
17 table tells us, in the second sentence, that:

18 "For the five year period shown in table 1, apart
19 from the Lakanal calls in 2009, of the total of 77 calls
20 where fire survival guidance was given, only one call,
21 in 2007, resulted in fatal casualties."

22 It seems that two people died on that occasion. Do
23 you see that?

24 A. I can.

25 Q. So the impression given by that table is clear that fire

1 survival guidance calls are rare and form an extremely
2 small percentage of the overall work load handled by the
3 control room at brigade control?

4 A. It is a small number of calls but the fire survival
5 database, I believe, indicates notable fire survival
6 calls. Fire survival calls --

7 Q. Just pausing there, that's in fact the next thing I was
8 going to ask you about, which is the extent to which
9 this figure of 77 in fact represents all the fire
10 survival guidance calls or merely a subset of them. If
11 you look back onto page 1389 on this point, the bottom
12 paragraph on the page at 151.

13 A. Could you say the number page again, please?

14 Q. 1389, so just the previous page. Actually, it's
15 probably best to look at all three paragraphs, so
16 starting at 149, we're told that:

17 "LFB control maintained a database of notable fire
18 survival guidance calls. The collection of data for
19 this database relied on control officers and/or
20 supervisors recording the call."

21 The next paragraph says:

22 "Following a notable FSG call, an informal debrief
23 of the call would be conducted at the CO's manager's
24 discretion to provide support for the CO [that's the
25 control officer] and identify any potential learning."

1 But there was no central log of these debriefs so it
2 wasn't possible to identify how many there were.

3 Then paragraph 151 says:

4 "It has not been possible to find any definition for
5 a notable FSG call, or to confirm that all such notable
6 calls were entered on the database. Senior control
7 managers confirm that the database provides the
8 opportunity for supervisors to record a call if they
9 deem it to be worthy. It is the only record of FSG
10 calls taken in control."

11 Have you seen and considered those paragraphs
12 specifically before today?

13 A. I have seen them before today, yes.

14 Q. Can you help us, then, with what firstly your practice
15 was about entering fire survival guidance calls that
16 occurred on your watch onto a database of notable fire
17 survival guidance calls?

18 A. It's very, very subjective. There's never been any
19 guideline on notable fire survival guidance calls to be
20 entered on the database, so I just used my discretion
21 based on my experience and knowledge. It was also very
22 difficult with -- some control officers, after you gave
23 a minor debrief, you went through and checked that they
24 were okay. Once the incident had been resolved, you had
25 to check on your own staff to ensure that -- how they

1 had been affected by the occurrence. So that was a sure
2 indication to me that there had been some effect, that
3 it was notable, because control officers are taking
4 calls day in, day out, and they weren't always simple.
5 Even when there's no fire survival guidance calls, it's
6 quite a complex process with some calls. So my main
7 concern was rather than recording them all on the
8 database, if it was something that seemed special,
9 noteworthy -- the authority, the managers could gain
10 from it -- I would record it, but there were no
11 guidelines given to me other than the fact that they
12 were notable.

13 Q. Let me come at the topic in this way: firstly, am
14 I right in thinking that whenever a control officer is
15 engaged in a fire survival guidance call, they should
16 indicate to a supervisor that that's happening?

17 A. They did. Every time an operator on my Green Watch had
18 any sign of a fire survival call, they would indicate to
19 the supervisor -- either myself, if I was in the room,
20 or one of my assistant operations managers -- and if it
21 was at all possible, one of us would leave the
22 supervisory area and go and assist the operator in any
23 way they could.

24 Q. It may be that because one of your colleagues would
25 assist in a supervisory role you wouldn't be aware that

1 a fire survival guidance call was taking place whilst it
2 was ongoing, but would it be fair for us to assume that
3 by the end of your particular watch you would know if
4 there had been any fire survival guidance calls during
5 that shift?

6 A. My supervisors would have brought to my attention any
7 fire survival call that had taken place while I was
8 absent from the room, but I would have been aware -- or
9 we would have been aware -- of any fire survival call if
10 we were in the control room at the time.

11 Q. And so at the end of any shift -- or indeed in the
12 course of it -- it would be your decision whether or not
13 to record such a call as notable on the database?

14 A. That would be correct.

15 Q. You told us that there was no guidance as to how to do
16 that. Do you know whether there was in practice, any
17 consistency, between the approach adopted by you and the
18 other three operations managers covering the red, white
19 and blue watches?

20 A. To my knowledge, there was no definition -- exact
21 definition of what notable fire survival guidance calls
22 were, so I would say it would be difficult, as we'd
23 never discussed the level of what should go on the
24 database. They might have had a different view to me.

25 Q. Did you ever see any statistics to indicate whether

1 there were broadly the same number of notable fire
2 survival guidance calls for each of the four coloured
3 watches or big differences?

4 A. Not to my knowledge.

5 Q. Do I understand from your evidence that there was never
6 any discussion about the approach in fact being taken by
7 you and your fellow operations managers for the red,
8 white and blue watches?

9 A. Not to my knowledge, no.

10 Q. We've seen the figure of 77 notable fire survival
11 guidance calls for a period of five years. That is 16
12 or so a year spread across four watches, so that would
13 be four, on average, for Green Watch in an entire year.
14 Is that representative of the total number of fire
15 survival guidance calls in an year, or would there be
16 many more that occurred but weren't considered notable?

17 A. I believe there were many more.

18 Q. What sort of percentage do you think got recorded as
19 notable?

20 A. I don't know.

21 Q. Can you give us any assistance as to whether we're
22 talking about 5 per cent, or 20 per cent, or 50 per cent
23 being recorded?

24 A. It would be picking something out the air.

25 Q. You stick with your first answer, that there were many

1 more?

2 A. I would say there were many more.

3 Q. Thank you. You've seen the statistics which indicate
4 that in a five year period, aside from the Lakanal House
5 fire, there was only one other call that resulted in
6 fatalities, and in the witness statement that you made
7 in July 2010 you commented on the fact that there is
8 a strong expectation that people will, in fact, be
9 successfully rescued; is that right?

10 A. That's correct.

11 Q. That was the working culture and belief and
12 understanding in the control room at the time?

13 A. It was.

14 Q. Fire survival guidance calls by definition may take
15 a period of time. They may take 10, 20, 30 minutes or
16 longer. Would I be right in thinking that they are
17 therefore something of an exception to the general
18 business of the control room? And again, tell me if I'm
19 wrong, but my assumption would be that the general aim
20 when dealing with calls is to get sufficient accurate
21 information quickly enough to make a prompt decision on
22 mobilisation and then end the call?

23 A. It doesn't have any bearing on mobilisation. We would
24 mobilise immediately while we're still talking to the
25 caller. I think the general fire survival call is very,

1 very quick because crews are on scene very quickly and
2 rescues are carried out normally very quickly, and the
3 majority of fire survival calls I was aware of were in
4 private houses.

5 Q. So you would say that many, perhaps most, fire survival
6 guidance calls are themselves short?

7 A. Yes.

8 Q. But turning back to my question about the general
9 business of control receiving 220,000 or so 999 calls
10 a year, am I right that the aim is to complete those
11 calls as quickly as possible, having gained the
12 necessary accurate information?

13 A. That would be the ideal, yes.

14 Q. I'm then going to go on and ask you about the
15 London Fire Brigade's policies in place in July 2009
16 relating to emergency call management. I'm going to ask
17 you to look at page 1762 in the advocates' bundles. Do
18 you have that?

19 A. I do.

20 Q. Thank you. This is LFB policy number 539, "Emergency
21 call management". If I take you in it to page 1774.
22 Towards the bottom of the page, there's a heading,
23 "Calls where people are unable to escape from the
24 premises or are trapped and unable to escape or those
25 threatening to take their own lives". It says:

1 "There may be occasions where, during the course of
2 handling an emergency call, it is apparent that the
3 caller is trapped inside premises, machinery or confined
4 spaces and is unable to escape."

5 Firstly, I should ask you: can you confirm that this
6 is a policy document you would have been familiar with
7 at the time?

8 A. I was aware of the document at the time.

9 Q. Then paragraph 5.16, which is underlined, says:

10 "Prompts are in place on the computer-aided
11 mobilising system to assist the control officer in these
12 situations."

13 Is that a reference to information that can be
14 brought up on the right-hand screen of the screens that
15 you showed us in the photographs?

16 A. That is correct. It would enable the control officer to
17 look at the reference information file where these
18 prompts would be placed.

19 Q. I'll take to you the reference information file in a few
20 moments. It continues:

21 "These may be associated with ..."

22 And if you go over the page, there's a reference to
23 fires and explosions, and then, in the middle of the
24 page on 1775, it says "Fire survival guidance":

25 "Detailed information, advice and guidance for

1 control officers concerning fire survival guidance will
2 be found in appendix 1 of this note and reference
3 information file 'Fire survival'."

4 If we look first at appendix 1, which is 1781.

5 THE CORONER: Could you just increase the size of that,
6 please. Thank you.

7 MR MAXWELL-SCOTT: It starts by saying:

8 "There may be occasions where, during the course of
9 handling an emergency call, it is apparent that the
10 caller is trapped inside the premises and cannot escape.
11 Prompts are in place on the computer-aided mobilising
12 system to assist control officers in [providing guidance
13 and reassurance and strengthening the relationship with
14 the caller]."

15 As I say, we'll look at that computer-aided system
16 in a moment once we finish looking at appendix 1.

17 Then it talks about the situation if it's the first
18 call to an incident and if it's a subsequent call to the
19 incident, and says:

20 "For both of the above instances, the control
21 officer will use the following information to provide
22 guidance and support to the caller."

23 And there are two bullet points. The first is:

24 "Get out and stay out."

25 The second is:

1 "Stay calm and reassuring throughout the call."

2 Then, under that, it says:

3 "Suggest an alternative escape route -- if normal
4 means of escape is blocked, eg back door, window,
5 balcony, adjacent balcony, flat roof."

6 I'll come back to what comes below, but underneath
7 it talks about what to do if a caller cannot escape. It
8 says:

9 "Offer reassurance. Be positive."

10 And it gives some suggested phrases to use, such as
11 "The Fire Brigade is on the way", "The firefighters will
12 be with you very soon" and "I'm going to talk to you
13 until the firefighters arrive".

14 Then, over the page at 1782, there's a heading,
15 "Assist in rescue", and the bullet points include:

16 "Obtain location of room -- which floor, front or
17 rear of building, which room, eg bedroom, bathroom,
18 lounge or kitchen, et cetera."

19 And also:

20 "Attract attention -- put a marker out of a window,
21 eg blanket, coat, et cetera. Shout to passers-by and to
22 firefighters searching."

23 I'll now ask you to look at the computer-aided
24 mobilising system. If you look at page 1758. That says
25 "Brigade control reference information" and it says

1 "Fire survival guidance". Is this the information
2 that's available, or would have been available, on the
3 London Fire Brigade's intranet?

4 A. It is.

5 Q. This is information that control operators could, if
6 they chose, pull up on the right-hand screen we saw in
7 the photographs; is that right?

8 A. That's correct.

9 Q. But it would be their choice to do so?

10 A. It would be their choice, but I would say that most
11 controllers -- control officers engaged in a fire
12 survival call would call up this information.

13 Q. If you look at it with me. I don't have the necessary
14 computer sophistication to put the two documents side by
15 side, but what is set out here is very similar to what
16 we saw in appendix 1. We see, at the bottom of that
17 page, advice to be offered and the same two bullet
18 points:

19 "Get out and stay out."

20 And then, underneath:

21 "Stay calm and reassuring throughout the call."

22 Then there's reference to suggesting an alternative
23 escape route, and a bit lower down, what to do if the
24 caller cannot escape -- offer reassurance, be
25 positive -- and some helpful phrases.

1 Then on page 1760, "Assist in rescue", and points
2 we've seen in appendix 1 about obtaining the location of
3 the room and attracting attention. Do you see that?

4 A. Yes, I do.

5 Q. There is one respect -- potentially a significant one --
6 in which what is said in this document, the reference
7 information file, is not identical to what is said in
8 appendix 1. I'll show you first appendix 1 at 1781. Do
9 you see that after the section which has the two bullet
10 points, "Get out and stay out" and "Stay calm and
11 reassuring throughout the call", this then jumps
12 straight to talking about suggesting an alternative
13 escape route? Do you see that?

14 A. Yes.

15 Q. Then if I ask you to compare that with 1759. Here
16 there's a section suggesting:

17 "Suggest an alternative escape route if normal means
18 of escape is blocked ..."

19 Then it goes on to talk about, as a last resort of
20 escape and only if the caller suggests it, a means of
21 escaping by dropping one level. So that might be from
22 the first floor to the ground in a house, for example,
23 or it could be dropping a level within a block of flats.
24 Can you see that?

25 A. Yes. I think there's a difficulty with a whole document

1 of text that's then converted into a guidance note to
2 use in a high pressure situation, and I would think the
3 reference information file is designed for simplicity,
4 to assist at the time rather than the full document.

5 Q. The difference, just so we're clear on what I'm drawing
6 your attention to, is the reference information file
7 separates out the section on something being a last
8 resort to the top bullet point about suggesting
9 an alternative escape route if normal means of escape is
10 blocked, whereas the text at appendix 1, at 1781, seems
11 to run the two concepts together, because immediately
12 under the phrase "Suggest an alternative escape route if
13 normal means of escape is blocked, eg back door, window,
14 balcony, adjacent balcony, flat roof" -- immediately
15 under that, it says:

16 "The above is as a last resort of escape and only if
17 the caller suggests it."

18 A. I cannot account for this change. I was not party to
19 the completion of either document so I cannot comment on
20 how it is written.

21 Q. Do you agree with me that neither of them discusses
22 specifically the situation of people in multiple
23 occupancy dwellings like tower blocks as opposed to
24 houses?

25 A. I believe the skills and the training that control

1 officers went through -- they were given guidance on
2 dealing with people in tower blocks or in blocks of
3 flats in general.

4 Q. Would I be right in thinking that control operators are
5 more likely to use and be familiar with the reference
6 information file than appendix 1?

7 A. I would agree with that.

8 Q. Well, let's work from the reference information file in
9 that case. I've put it back on the screen, 1758. On
10 that first page, the first thing it says at the bottom,
11 "Advice to be offered", is this:

12 "Get out and stay out."

13 Is that the normal advice given to people when they
14 call 999?

15 A. It was the advice that was given and the way we were
16 trained up until around about '94, I believe, when fire
17 survival guidance instructions were initiated by the --
18 a "Dear Chief Officer" letter, I believe, following
19 another incident at a fire authority.

20 Q. You've already made the point that people dealing with
21 a fire survival guidance call are operating in
22 a pressurised environment.

23 A. They are indeed.

24 Q. And this is the one tool which is immediately available
25 to them; is that right?

1 A. It's the tool that is available to them, but their
2 training, their experience and knowledge that they've
3 gained over the years are the forerunner and the fire
4 survival guidance is there as a back-up to my -- using
5 my experience, it will be a back-up to me. My training,
6 experience and knowledge would be the thing I would go
7 to first.

8 Q. I'll come to training, but the reality is, is it not,
9 that back in July 2009, if somebody working in control
10 had a fire survival guidance call -- and it may be they
11 would not have had one previously for some months or
12 even years -- this document, the reference information
13 file, is the one thing that they could immediately pull
14 up on screen; is that right?

15 A. It is, but I would say that they are into -- well into
16 a difficult call from the caller prior to getting this
17 information up on the screen, because the first thing
18 they would be doing is mobilising the fire appliances to
19 the incident first and foremost. Because both jobs are
20 not in isolation; it is immediately into fire survival
21 following mobilising appliances.

22 Q. Well, I understand that, but if one pulled this up on
23 screen, the first thing -- do you agree with me -- it
24 tells you to do by way of giving advice is to say, or
25 convey the message "Get out and stay out"?

1 A. I would like to think so, yes.

2 Q. And it doesn't, in this document, set out any special
3 rule or exception for tower blocks?

4 A. No, but part of our training was from fire safety
5 officers that gave us the additional information that
6 wasn't necessarily in this fire survival guidance
7 document, and again, the experience and knowledge that
8 control officers have, based on -- based on experience,
9 leads them to be able to deal with fires or deal with
10 people that are in tower blocks, that are in blocks of
11 flats.

12 Q. If one looks over the second page of the document, 1759,
13 as I've said, the first bullet point on that page is:
14 "Suggest an alternative escape route -- if normal
15 means of escape is blocked ..."

16 So in other words, this follows on from the first
17 advice. The first advice is "Get out and stay out" and
18 this second piece of advice makes sense in that context;
19 in other words, the caller has said to the operator:
20 "I can't get out", and there is then advice to be given
21 about: "Well, are there other, less obvious ways of
22 getting out of your dwelling?"

23 A. That will be a logical way of dealing with it.

24 Q. I am then going to ask you about information that was
25 available on the London Fire Brigade's website that

1 could be accessed by the general public prior to
2 3 July 2009. I think the most convenient way to do this
3 is to look in the control report, where it's summarised
4 at page 1386. This says:

5 "Details of fire safety advice for the public
6 published by the LFB is provided below to illustrate the
7 LFB's position relating to fire survival, particularly
8 in purpose-built flats and maisonettes high rise, and is
9 included to illustrate the complex picture of advice
10 available (either to control officers or directly to the
11 public)."

12 Then the point is made in paragraph 122 that
13 in April 2008, DCLG -- so the Department of Communities
14 and Local Government -- part of the central government,
15 advised Fire Brigades to stop producing separate fire
16 safety leaflets which duplicated information produced by
17 the Department of Communities and Local Government.

18 Then at paragraph 134, we have set out a summary of
19 the information in leaflets and website pages that the
20 London Fire Brigade had put out in the decade starting
21 in 2000, and the last piece of information we have
22 relates to May 2008. If I take you in particular to
23 what is said to have been on the London Fire Brigade
24 website in May 2008. It says:

25 "In the event of fire."

1 That's the page:

2 "The website contained guidance on escaping from
3 fires in flats and maisonettes including ... if there's
4 a fire elsewhere in your building, you are usually safer
5 staying in your flat unless heat or smoke is affecting
6 you."

7 Is that information that you were aware was being
8 communicated to the general public by the
9 London Fire Brigade in this period before 3 July 2009?

10 A. I wasn't aware of the information on the website, but it
11 was similar to information that I was aware of from
12 previous training that I'd given with fire survival
13 guidance in 1994.

14 Q. Just looking at what that phrase might be said to mean:

15 "If there's a fire elsewhere in your building, you
16 are usually safer staying in your flat unless heat or
17 smoke is affecting you."

18 It might be thought that the natural way to read
19 that, as a member of the general public, is that if heat
20 or smoke is affecting you in your flat then you're
21 probably going to be better off out of it. Do you
22 agree?

23 A. Not necessarily, because the smoke and heat affecting
24 your flat could be in one of your escape routes, or your
25 escape route. In isolation in the control room, you do

1 not know exactly where or what parts of the building are
2 affected, what exactly is on fire, so you have to be
3 very careful and the danger is that you do not know
4 exactly -- you cannot rely 100 per cent on what the
5 caller is saying because callers tend to panic. If
6 I can use a personal example: I have known people
7 actually in a building on fire being very, very calm,
8 and somebody 300 yards away reporting a fire, panicking,
9 hysterical. So it is very, very difficult. There is
10 always a danger that you're being affected by the smoke
11 in your flat. If we go 100 per cent with "Get out and
12 stay out", we could be sending the person into an escape
13 route where the fire is.

14 Q. But would you agree with me that this information on the
15 London Fire Brigade's website suggests that the presence
16 of heat or smoke in your own flat changes things
17 markedly?

18 A. It could change things markedly, yes.

19 Q. And the principle that you're usually safer staying in
20 your own flat ceases to apply once your flat is affected
21 by heat or smoke? You may be safer in your flat, you
22 may not be, but the general principle that you're
23 usually safer in your flat cannot be stated with that
24 degree of confidence once there's smoke in it?

25 A. I would agree with you, but I still feel that there is

1 such a difficult area. Based on the circumstances --
2 the situation at the time, and referring to this
3 incident in particular, we were getting lots of
4 information where the fire was in lots of places within
5 the building. We couldn't guarantee -- and I don't
6 think anybody could guarantee -- that using the "get out
7 and stay out" would have kept people safe.

8 THE CORONER: Mr Simmons, I'm going to stop you there,
9 because Mr Maxwell-Scott is trying to take you through
10 this step by step. So if you just stop at that point.

11 A. I'm sorry.

12 THE CORONER: No, don't apologise, thank you.

13 MR MAXWELL-SCOTT: I'm not asking you about the events of
14 3 July yet. I appreciate each call is different. I'm
15 just asking you about the policies in place at the time.

16 Let me now ask you a question about the practices at
17 the time. If I ask for you to be shown your witness
18 statement, which starts on page 489 in the statements
19 bundle. (Handed) Firstly, can you identify that as the
20 first page of your statement, dated 6 July 2010?

21 A. It is indeed.

22 Q. So approximately a year after the Lakanal House fire?

23 A. That's correct.

24 Q. Then if you turn to the second page of it, at 490, the
25 second paragraph says that you received your initial

1 basic training when you first became a control officer.

2 So that would have been back in 1969?

3 A. That would be correct.

4 Q. Then specific training relating to fire survival
5 guidance calls was introduced in the mid to late 1990s,
6 which is something that you've mentioned a couple of
7 times in your evidence, and then it says:

8 "Additional training has been provided during my
9 career but not in relation to fire survival guidance
10 calls, until the continuation training that was
11 introduced after the incident at Lakanal."

12 Then you say:

13 "These refer to calls from persons trapped and they
14 are defined as such from the information they provide
15 regarding their inability to exit the building. This is
16 taken at face value. However, a caller will be advised
17 to evacuate the building if they are able to do so."

18 I wasn't clear whether that sentence, "a caller will
19 be advised to evacuate the building if they are able to
20 do so", was meant to relate to training introduced after
21 the Lakanal House fire or was meant to relate generally
22 to houses but not to flats. So perhaps if you could
23 just help with that?

24 A. To me, it relates to all buildings. I was always
25 taught -- and up to 1994, I believe all controllers, the

1 only survival -- fire survival guidance per se was "Get
2 out and stay out". As I said, it was only introduced
3 following an event in another fire brigade's area.

4 Q. Do I understand from what you just said that the advice
5 that's sometimes referred to as "Stay put" you believe
6 was only introduced in the mid-1990s?

7 A. It's my belief that following a fatal fire in the
8 Fire Brigade, the coroner made certain recommendations
9 that Fire Brigade control officers should be trained to
10 give fire survival guidance advice, and hence a "Dear
11 Chief Officers" letter was sent out to all five
12 authorities from the Home Office, who I believe at the
13 time were running the Fire Brigade.

14 Q. Then your paragraph goes on to say:

15 "The objective of the control officer handling
16 a fire survival guidance call is to provide advice and
17 guidance that will keep the caller safe until the
18 arrival of a fire crew and takes into account the
19 expectation that fire will not spread between
20 compartments within a high rise block."

21 Could I just ask you to what extent you were given
22 information or training about --

23 A. The training would be --

24 Q. Let me just finish the question.

25 A. Sorry.

1 Q. -- about the principle of compartmentation?

2 A. The training I'd been given was involving fire safety
3 officers, experienced firefighters, experience of
4 dealing with, from a control perspective, fires in other
5 blocks of flats London-wide, indicated that -- to me
6 that it was unlikely that fire would spread from one
7 compartment to another in high rise blocks or any block
8 of flats. That was the expectation that I had been
9 given by my previous experience and by my training.

10 Q. I'm particularly interested in the next sentence, which
11 says:

12 "Control officers will seek to gather sufficient
13 information regarding their whereabouts to enable fire
14 crews to locate them, but callers are not routinely
15 questioned about access to escape routes."

16 Then the point I've already mentioned:

17 "... there is a strong expectation among control
18 room staff that fire crews will reach persons receiving
19 fire survival guidance."

20 The bit I'm interested is what appears to be
21 evidence of a practice of not routinely questioning
22 callers about access to escape routes. What do you mean
23 by that?

24 A. Maybe it's a personal thing, but whenever I go into
25 a new building or somewhere, a new house or property,

1 a restaurant, I routinely look at where the exits are,
2 and -- as I say, maybe it's my training -- I would think
3 the call -- I think in the majority of cases the callers
4 would know the alternatives, rather than just through
5 the door.

6 Q. The impression that was given by the reference
7 information file was that the first general advice is
8 "Get out, stay out" and if that isn't possible, one
9 would then go into a discussion about alternative escape
10 routes. What I was wondering was whether you were
11 saying in this witness statement that in practice that
12 sort of discussion wasn't generally happening
13 before July 2009?

14 A. It's very difficult when you're asked a year after to
15 make a statement, but in the course of a call
16 I wouldn't -- I personally wouldn't ask a caller about
17 escape routes unless I was guiding them to it or I knew
18 they -- there were possible -- the possibility of other
19 escape routes. It's very difficult, because each
20 individual call -- each individual fire survival call is
21 different, to generalise and say, "I'd do this, I'd do
22 that."

23 Q. I'm going to move on and ask you some general questions
24 about the way in which communication can work between
25 those at the fire ground in a incident and those at

1 brigade control. Firstly, about how information is
2 passed and the extent to which it is passed from the
3 fire ground to brigade control. Back before the
4 Lakanal House fire, what would the practice be in terms
5 of keeping brigade control updated on fire development
6 and the success or otherwise of firefighting efforts at
7 the fire ground?

8 A. On any serious incident, control would normally expect
9 informative messages indicating what the property was,
10 size, height, floors, what was alight, what was being
11 used to extinguish the fire, if persons were involved,
12 how many, because we would -- we would use that
13 information to inform other officers, other departments,
14 if necessary other services, on what the situation was,
15 what we were having -- what we were dealing with. Just
16 a picture in words, if you -- if I can use that term.

17 Q. The members of the jury have seen the two informative
18 messages that were sent in the first hour or so of the
19 Lakanal House fire. That's the sort of information you
20 would expect at brigade control, is it?

21 A. That is correct, yes.

22 Q. But not more than that?

23 A. Not normally, no, because there should be the
24 information that we're required to work on and to inform
25 within those messages.

1 Q. Before the Lakanal House fire, do you recall any
2 occasions -- or a number of occasions -- when those at
3 the fire ground would ask brigade control to ask
4 a resident who was on the line a specific question or
5 questions?

6 A. I've never experienced that in my career.

7 Q. Would you agree it would be something that in theory
8 could be done?

9 A. I think it could be done, but very early in my career we
10 were told not to call back a caller, because you could
11 be taking them back into the fire because they might be
12 on their way out, their telephone would ring, and they
13 would go back into the premises. So I think for control
14 officers to ring back a caller that had gone off the
15 line had an element of risk.

16 Q. I can certainly see that, back in the era of landline
17 phones, but I'm thinking perhaps more about a caller who
18 was still on the line, or perhaps whom you know has used
19 a mobile telephone. Is the evidence that it could be
20 done in theory, but in practice, it was simply something
21 that was not done?

22 A. If they were on a mobile phone, I would suggest that
23 they were still in contact with brigade control or with
24 the control room, not with anybody on the incident
25 ground.

1 Q. Maybe you're misunderstanding my question. What I'm
2 asking about is the possibility of somebody at the
3 incident ground becoming aware that there is a caller in
4 a flat engaged in a ongoing call with somebody at
5 brigade control, and the person at the incident ground
6 asking the control operator to ask the resident
7 a specific question.

8 A. It could be done, but I've never known it to be done.

9 Q. Thank you. I imagine your answer would be the same
10 about the possibility of getting the control operator to
11 give some form of advice to somebody who was engaged in
12 an ongoing fire survival guidance call? It could be
13 done but you don't have any experience of it being done?

14 A. Could you restate that, please? I misunderstood the
15 question.

16 THE CORONER: Yes, Mr Maxwell-Scott, you're talking about
17 giving advice to someone. Perhaps you could be a little
18 more specific?

19 MR MAXWELL-SCOTT: The question before related to the
20 possibility of putting a question to a resident in, say,
21 a block of flats at the request of somebody at the
22 incident ground, but a question being put by the control
23 operator at brigade control. Now I'm asking you the
24 question in a slightly different way, about the
25 possibility of, instead of a question being put, of

1 advice being given, so the possibility of somebody at
2 the incident ground saying to an operator at brigade
3 control: "Tell the person who is still on the line in
4 a fire survival guidance call to do X or Y."

5 A. If control had been given that information, it would
6 have been passed -- or it will be passed immediately,
7 but I have never known that happen.

8 Q. So, again, it could be done, but it's something you have
9 never known happen?

10 A. I've never known happen but it could be done and
11 I wouldn't like to say whether it has been done by
12 another incident, but I have never had experience of
13 that.

14 Q. I can only ask about your direct knowledge on a matter
15 such as that.

16 In terms of the technological capabilities of the
17 system at brigade control, would it have been possible
18 for there to be some form of three-way telephone call
19 whereby you could connect somebody at the fire ground,
20 such as the incident commander, directly to speak to the
21 person trapped in their flats who was engaged in a fire
22 survival guidance call? Would that have been something
23 that was technically possible?

24 A. I don't know whether it is technically possible at all.

25 Q. Thank you. I'd like to ask you, then, about a short

1 topic to do with quality monitoring. This is something
2 that we find referred to at page 1778, which is within
3 the emergency call management policy.

4 Paragraph 6.6 refers to:

5 "A system of monitoring and assessing emergency call
6 handling and other related tasks by control officers
7 will be introduced by brigade control. Each watch and
8 section will carry out their own assessments and
9 evaluations."

10 Then at 6.9:

11 "In order to successfully monitor an individual's
12 call-handling performance, an agreed set of performance
13 and assessment standards are in place (see below)."

14 Then at 6.11:

15 "Control commanders [so that's people like yourself]
16 will nominate senior control officers to groups of
17 control officers for assessment purposes."

18 Then over the page --

19 THE FOREMAN OF THE JURY: Sorry, excuse me,

20 Mr Maxwell-Scott. Could you bring that up a little
21 larger for us? Thank you.

22 MR MAXWELL-SCOTT: At 6.14:

23 "When assessing control officers against the
24 authority emergency call handling standards, the
25 following criteria will be used."

1 You'll see there are a number of headings, and as
2 one would expect, they essentially relate to the general
3 workload of control officers, the routine 999 calls that
4 we've discussed.

5 A. That's correct.

6 Q. And the only reference to fire survival guidance is on
7 page 1780.

8 A. Yes.

9 Q. What it says there is:

10 "Identify that the call required fire survival
11 guidance and tactics were required and demonstrated
12 where the information could be found on the mobilising
13 system."

14 Firstly, I don't quite understand what that bullet
15 point says, so if you could help with that I would be
16 grateful.

17 A. What I think it's saying is because fire survival calls
18 were generally infrequent and there's a possibility that
19 not all would be recorded, because of what we said
20 before, that our technical support -- or the
21 Fire Brigade technical support team would have to look
22 on the system to identify a call that matched that
23 criteria with an operator so they could assess on it,
24 because in fairness, some control officers might go
25 through their career without ever dealing with a fire

1 survival call, because it depends on the circumstances
2 when they're on duty. It's a very woolly area for
3 quality assurance because if you don't get the calls,
4 how can you assess it?

5 Q. Well, this was what I was going to finally ask you
6 before we have a break: fire survival guidance calls,
7 I'm sure you would agree, are potentially an extremely
8 important part of the control room's work, but equally
9 they are something that is extremely infrequent, and
10 what I was wondering was how, if at all, it was possible
11 in practice to carry out any quality monitoring of the
12 work that was being done by control officers in fire
13 survival guidance calls?

14 A. I would think overall it's a very difficult thing to
15 achieve and -- not impossible but very near, because
16 fire survival calls are unique and in my opinion it's
17 difficult to say whether that's a correct way of dealing
18 with it or the wrong way of dealing with it because of
19 the uniqueness of them.

20 Q. How was your watch carrying out quality monitoring of
21 the fire survival guidance calls that arose on its
22 watch?

23 A. I was not aware of any calls that would have warranted
24 that area taken by people on my watch.

25 Q. Was there, for example, any practice of calling for the

1 tapes and listening to them and seeing if there were any
2 learning points from them?

3 A. Normally if a fire survival call had occurred, I had the
4 ability to instant-replay the tape recorder on each
5 console, and where necessary I would have spoken
6 directly with the operator, if it was felt necessary.
7 I never had the necessity to do that.

8 Q. Did you listen to calls?

9 A. I did listen to calls.

10 Q. Tapes of them after they'd happened?

11 A. In some cases, yes, where there was a notable one, but
12 you're asking me to -- well, I cannot remember any that
13 were particularly notable.

14 Q. Thank you.

15 Madam, that would be a convenient moment for
16 a break.

17 THE CORONER: Thank you very much. Yes, thank you. Yes,
18 members of the jury, be back here for 2 o'clock, please.
19 Thank you very much.

20 Mr Simmons, because you're part way through giving
21 your evidence, the strict rule is that you must not talk
22 to anyone about your evidence or indeed this matter, so
23 the safer option is to have lunch by yourself.

24 A. Thank you, madam.

25 THE CORONER: Could you be back here by 2 o'clock, please?

1 A. Most definitely.

2 (1.01 pm)

3 (The short adjournment)

4 (2.00 pm)

5 MR MAXWELL-SCOTT: Before we start, madam, I'm just going to
6 say I've spoken to a couple of the advocates over the
7 adjournment about the position of Deborah Real.

8 THE CORONER: Yes.

9 MR MAXWELL-SCOTT: I believe that Ms Al Tai would like to
10 ask her a very small number of questions, so it may be
11 that we can discuss that when we next take a break in
12 an hour or so.

13 THE CORONER: All right, that sounds fine. Thank you very
14 much let's find a proportionate way of dealing with it.

15 MS AL TAI: Madam, if it assists, the questions will take
16 a number of minutes.

17 THE CORONER: Yes, I appreciate that, but then also we will
18 need to find a way to set the context. Any other
19 points? Thank you.

20 Good afternoon, Mr Simmons. If you could remember
21 not to speak too quickly, because the shorthand writers
22 are making a transcription and they need to keep up?

23 A. I'll try.

24 (In the presence of the Jury)

25 THE CORONER: Thank you. Yes, Mr Maxwell-Scott.

1 MR MAXWELL-SCOTT: Good afternoon, Mr Simmons. I'm now
2 going to turn to a new topic, which is training, and ask
3 you to look at a policy which starts at page 1800 in the
4 advocates' bundles. This is London Fire Brigade policy
5 number 164, headed "Training", and the contents include
6 trainee control training, continuation training and
7 refresher training. Can I firstly ask you if this is
8 a policy document that you would have been familiar
9 with?

10 A. It is.

11 Q. If we turn on, then, to page 1801. The first section is
12 about trainee control training, and in summary, is it
13 right that when new employees joined control staff at
14 brigade control they underwent a training course of
15 approximately eight weeks in duration and part of that,
16 I think towards the end of it, included training on fire
17 survival guidance calls?

18 A. I believe that is correct.

19 Q. If I deal with that aspect of training first and ask you
20 now to look at page 1388. What we're told here, back in
21 the London Fire Brigade control report, is that fire
22 survival guidance training was amended following the
23 publication of a document in 2004, and then at
24 paragraph 136:
25 "Between 2005 and 2009, the fire survival training

1 for new entrants has consisted of a presentation with
2 accompanying notes and a survival guidance training
3 package handout."

4 What I'll do now is I'll ask you to identify those
5 documents, firstly at 1736. Can you confirm that these
6 are slides from a PowerPoint presentation that would
7 have been delivered to new employees in brigade control
8 in the period between 2005 and 2009?

9 A. No, I can't confirm that because I wasn't party to this
10 training, although I was aware it was given as part of
11 the training course.

12 Q. I understand that you can't confirm it yourself, but
13 I believe from the annexes to the control report that
14 these are the slides in the presentation that I've just
15 mentioned.

16 Let me show you then the handout that, as
17 I understand it, accompanied it. That starts at 1742.
18 It may be helpful for you to look through the next three
19 or four pages so you can tell us whether this is
20 something you've seen before and recognise or not.

21 A. I was aware of it but not -- had not seen it, because it
22 was a trainee document from our -- from the
23 London Fire Brigade control training school to the
24 trainees. I was aware they were given several handouts
25 relating to subjects but not the actual content of these

1 documents.

2 Q. I understand that. Let me then draw your attention to
3 three aspects of the content. I can do it on the
4 slides. Firstly at 1737, looking at the bottom left
5 slide, which says "Assess":

6 "Can the caller escape to safety?"

7 If the answer is yes:

8 "Advise caller to get out and stay out."

9 Then a qualification to that advice in respect of
10 purpose-built dwelling flats, for example high rise
11 blocks:

12 "If fire is not in caller's flat, advise them to
13 remain in their property until the arrival of the
14 Fire Brigade."

15 Do you see that?

16 A. Yes.

17 Q. I don't need to take you to it, but the handout says the
18 same thing at page 1744. So do I understand from your
19 previous answers that you were aware in general terms
20 that any new employees that came to work for you after
21 2005 would have had training but you didn't know
22 precisely what they'd been told during that training?

23 A. From 1994, when fire survival was first introduced, it
24 was part of the training course for new entrants, but as
25 we'd already been given our training in control,

1 I wasn't -- as established control officers, I wasn't
2 aware of the full details of what the trainee would have
3 been told by the training officers.

4 Q. You see, what that slide says is if the fire isn't in
5 the caller's flat, advise them to remain, and it doesn't
6 say anything one way or the other about smoke in the
7 caller's flat. Do you see that?

8 A. I do see that, yes.

9 Q. If you recall the information that I showed you earlier
10 on the London Fire Brigade website, that said that your
11 own flat will usually be the safest place to be unless
12 it is affected by fire or smoke, and what I ask for
13 comment on is the fact that this slide seems to be
14 delivering a slightly different message, because it
15 doesn't talk about smoke at all.

16 A. I agree it differs from what the hand -- what the
17 authority document says, but I cannot account for the
18 apparent discrepancy that you're indicating.

19 Q. Well, I don't expect you to be the right person to
20 account for it, for reasons that you've explained, but
21 you agree with me that it is there. Did you know that
22 your new recruits would have been given content like
23 this so that they were being told to focus on whether
24 there was fire in the caller's flat and weren't being
25 told anything about whether the flat was affected by

1 smoke?

2 A. No, I did not know that.

3 Q. Then over the page at 1738, and the same information is
4 in the handout at 1745. A continuation of the content
5 about assessing:

6 "Is there an alternative means of escape?"

7 And one that is identified is balcony.

8 Then if I take you to 1741. It's a slide headed
9 "Call psychology", and essentially the same thing is
10 said at 1749 in the handout. It advises:

11 "Create a bond with the caller."

12 And amongst other things:

13 "Tell the caller the firefighters are on their way
14 and will be there very soon."

15 And above that:

16 "Reassure the caller that they are going to
17 survive."

18 It's right, isn't it -- I'm certainly not suggesting
19 that it's wrong advice to give but control officers were
20 trained to give reassuring advice like this, whether or
21 not it was in fact completely factually accurate?

22 A. Yes, we were always told to err on the positive side
23 because -- that was the training and historical
24 expectations said that to be true. Apart from the
25 incidents that you highlighted earlier, 99 per cent of

1 the time it is true. But the -- on occasion, it proved
2 not -- possibly proved not to be.

3 Q. So for historical reasons, it was a reasonable thing to
4 say and it was also probably thought to be beneficial to
5 the caller to be telling them positive messages like
6 that?

7 A. It is. Always positive, if you can be.

8 Q. So that's the training of new employees from 2005
9 onwards. If I then ask you about continuation training.
10 This is going back to the policy number 164 at
11 page 1801. Paragraph 2.1 says:

12 "On watch training -- one of the responsibilities of
13 a watch manager is to ensure that their watch are
14 properly trained."

15 So the watch manager is somebody like you; is that
16 right?

17 A. That would be correct, yes.

18 Q. It says:

19 "Such training or instruction may be of a general
20 nature on new or existing procedures or equipment, or
21 may be directed at individuals of whom it is perceived
22 have a training need. Watch managers, in liaison with
23 the senior controller (training), are to formulate and
24 progress training and instruction."

25 So that was something that fell to you to do in

1 liaison with a senior controller; is that right?

2 A. It is, yes.

3 Q. Then over the page, it says:

4 "Watch training record -- a record of all training
5 and instruction carried out is to be maintained by each
6 watch manager."

7 That's you again, isn't it?

8 A. That is correct.

9 Q. If I then ask you to look at a different policy, which
10 is policy number 155, which starts at page 1806. This
11 is entitled "Standard working routine". Is this
12 a policy you're familiar with?

13 A. It is.

14 Q. If we go to page 1807, we're told in the introduction
15 that:

16 "A standard working routine, which provides
17 uniformity, continuity and consistency in application,
18 is operated on all watches in brigade control."

19 Then down the page, there's a section on training.

20 3.2:

21 "Watch managers are to ensure that training periods
22 are properly organised and monitored, so that all
23 personnel under their command receive a balanced
24 schedule of practical and theoretical training and
25 instruction, as determined by the principal controller."

1 Then 3.4:

2 "The mandatory minimum training period allocated to
3 each watch is four hours over the tour of the duty, in
4 order to accommodate the perceived training needs."

5 Then before I ask you a question about that, if you
6 go over the page, can you see a standard working
7 routine:

8 "The following is the standard working routine
9 operated, which indicates the periods that personnel may
10 be released from their allocated duties in brigade
11 control."

12 You see reference to training in the period between
13 1010 and 1110 hours during the day, and again 1515 to
14 1615 hours during the day, and in the night watch, 2115
15 to 2300 hours. But of course at the very bottom of the
16 page, we see at (e):

17 "At times of high demand, ie conditions of spate
18 et cetera, training will be suspended. However, watch
19 training records will clearly register and record the
20 reasons for underattainment."

21 Having shown you those documents and introduced them
22 to the members of the jury, can you explain in
23 particular what's meant by "mandatory minimum training
24 period allocated to each watch of four hours over the
25 tour of duty", paragraph 3.4?

1 A. Yes, it's clear that there were four hours at regular
2 intervals throughout the 48 -- or the duty period where
3 training would be undertaken on a watch. There was some
4 flexibility in the hours and it was very much left to
5 the control commanders what training was carried out
6 appropriate to each individual.

7 Q. What is meant by a tour of the duty? How long is that?

8 A. Tour of duty is the -- when this was written, it was one
9 day, one night duty, three days off, but the last tour
10 of duty I did was two days on, 8 till 6.30, one day off,
11 then two night duties, 1830 to 0800, then three days
12 off. So the tour of duty is that five day period -- or
13 that tour. It's the two days on -- two days and two
14 nights.

15 Q. So 48 hours working?

16 A. Basically, yes.

17 Q. So this is saying there should be four hours mandatory
18 minimum training in every 48 hours of duty?

19 A. Basically, yes.

20 Q. If I then take you to page 1387 in the control report.
21 I'm looking at the very bottom paragraph, which says
22 that, in the final sentence:

23 "It has not been possible to locate any records for
24 the watch training between 1994 and 2009."

25 Is that your understanding as well?

1 A. If it says that, yes. Before the middle 90s and late
2 90s, everything was recorded manually, where -- because
3 we didn't have access to -- access or -- Excel databases
4 at that time, and therefore it was very manual when
5 training was done. Following that date, for six years
6 I cannot account for the training period because I was
7 not in -- in the control at that time, and towards the
8 latter end of my career, the -- because of system
9 changes within the authority, it made access to the
10 training database virtually impossible for on-watch
11 personnel.

12 Q. Taking this carefully, from 2006 to 2009, am I right in
13 summarising the policies to say that as a watch manager
14 you were meant to be ensuring a certain amount of
15 training and keeping records of it?

16 A. There was training carried out --

17 Q. Just stick to the question. Am I right in saying that's
18 what the policies say?

19 A. That's what the policy says, but my understanding was
20 from the principal managers of control that there was
21 flexibility within that working routine for training.

22 Q. Dealing with the records first, can you explain why no
23 records exist of such training taking place?

24 A. No.

25 Q. To the best of your recollection, were you personally

1 creating records of the training that your watch did?

2 A. I believe so, but I cannot categorically state that,
3 because it was now so long ago.

4 Q. What training were you in fact ensuring that your watch
5 received by way of continuation training?

6 A. Changes in procedures, new -- entry of new equipment
7 into the authority, general mobilising changes.

8 Q. I think I'm right in saying that as far as your watch
9 was concerned, continuation training did not include any
10 training in relation to fire survival guidance calls?

11 A. No training on watch was carried out for fire survival
12 training because of the nature of its sheer scale. All
13 fire survival training was done by central training
14 officers in coordination with fire safety officers from
15 the operational side, and in the time allowed for
16 on-watch training -- an hour for one individual --
17 you -- if you could get the fire safety officer
18 available on the night duties, which was not possible,
19 to put their input in, I think it would take several
20 months to get the watch trained on on-watch basis,
21 because while we were training on watch, staff were
22 subject to recall due to call rates and workloads within
23 the control room. We didn't have the luxury of being
24 able to take people totally away and have them trained
25 without disruption.

1 Q. Does it follow from that that by way of formal training,
2 those working in the control room hadn't had any since
3 they joined the control room, whenever that may have
4 been?

5 A. They had training. They were given training as and when
6 changes to procedures occurred, and they were kept
7 current with changes in procedures. Whether it was
8 recorded or not is a different matter, but
9 I categorically state Green Watch were trained as and
10 when necessary to the standards that was required, where
11 they could operate effectively and efficiently.

12 Q. You mentioned training in relation to changes in
13 procedures. When would the last time there had been
14 a change in procedure in relation to fire survival
15 guidance calls have been? In other words, if somebody
16 had been working at brigade control for 30 years or so,
17 when would they have last had formal training on fire
18 survival guidance calls?

19 A. If I can quote my own experience, I was trained in fire
20 survival guidance in 1994. I received no further
21 training in fire survival guidance until after the
22 Lakanal incident, when -- basically there was no
23 difference in the training from 1994 to 2010, I believe.

24 Q. Can I try and identify with you that 1994 training. If
25 you look at 1703. This sheet tells us that we're

1 looking at an annex to --

2 THE CORONER: Sorry, would you just stop a moment. I think

3 Mr Simmons is just finding it.

4 A. I've got it.

5 THE CORONER: Thank you.

6 MR MAXWELL-SCOTT: This sheet tells us that what we're going

7 to have behind it is an annex to the control report,

8 which is said to be the training document "Making people

9 safe, 1994". I'll take you to that page first, because

10 what follows doesn't specifically have a date on it, so

11 it's useful to have that explanatory cover sheet.

12 I think you've been looking through the next few pages.

13 Do you recognise that? I know it's a long time ago.

14 A. I vaguely remember it. I believe it was a handout given

15 with the presentation we had from our previous

16 training -- or the training officer at the time.

17 Q. Just looking in it to one or two specific paragraphs, on

18 1710, there's reference to smoke and the effects of

19 smoke, separate from heat and flame. Towards the bottom

20 right, there's reference to breathing difficulties,

21 possible disorientation and that the toxic effects may

22 result in irrational behaviour. Then:

23 "Inhalation of hot gasses my cause severe damage to

24 the internal tissues of throat and lungs."

25 So that flags up the fact that smoke carries with it

1 separate risk to heat and flames. Would you agree?

2 A. Yes, that's correct.

3 Q. Then over the page, there's a section on "Escape from
4 fire", and then within it, paragraph 5.3 deals with
5 flats and maisonettes.

6 THE CORONER: Do you have that, Mr Simmons?

7 A. Yes, madam.

8 THE CORONER: Yes.

9 MR MAXWELL-SCOTT: I'm particularly interested in the
10 paragraph on the right hand column, just above 6, which
11 gives a description of maisonettes. It says this:

12 "A maisonette has two levels and its own staircase
13 within the individual dwelling, and some alternative
14 escape route is normally provided from the level which
15 does not contain the main entrance."

16 Was that your understanding, that a maisonette on
17 two levels, if it has a front door on one level, will
18 normally have an alternative escape route on the other
19 level?

20 A. No, it wasn't.

21 Q. Before I turn to ask you about the events of 3 July
22 itself, we've looked at policies and we've look at some
23 training materials. Speaking firstly for yourself, what
24 would you have thought was the appropriate advice to
25 give to somebody in a flat in a tower block who had

1 smoke in the flat, but the flat itself was not on fire?
2 Would the advice be "Stay put" or would the advice be
3 "Get out, stay out"?

4 A. It depends very much, from my perspective, on what else
5 was happening, what other information did I have, what
6 information was coming at me, at my staff, that could
7 make a -- make a decision.

8 Q. Can I summarise that -- tell me if I'm being unfair --
9 by saying that the answer is: it depends. Because it's
10 not automatically in every case "Get out, stay out" but
11 it's not automatically in every case "Stay put"?

12 A. No, you're correct in that respect.

13 Q. Can you comment on whether those working under you in
14 the control room would have been of the same view?

15 A. As I said earlier, every fire survival call will be
16 unique in its own respect and the control officer
17 dealing with that call will make decisions based on the
18 information they have or interpret from the caller.

19 Q. I'll now turn and ask you about some events on the
20 afternoon of 3 July 2009. May I preface what I ask you
21 by referring to some things you say in your witness
22 statement, starting at page 493. In the top paragraph
23 of 493, you say:

24 "As referred to above, it was our overwhelming
25 expectation that all the callers receiving fire survival

1 guidance would be rescued, as we had never previously
2 experienced anything to the contrary. During this
3 incident, we did not receive any indication from the
4 scene that fire crews were experiencing difficulties in
5 reaching them due to deteriorating circumstances or that
6 they were having trouble identifying individual premises
7 within Lakanal. Had we been aware of this, we may have
8 considered advising the caller to assist in identifying
9 their location by hanging a sheet from the window or
10 something similar but we would not have informed the
11 caller that they may not be rescued."

12 Does that reflect your thinking at the time and
13 today?

14 A. That reflects my views now.

15 Q. Then if you look in the bottom paragraph on that page,
16 you say:

17 "In reflecting upon the events of that day, I can
18 categorically state that the period of time dealing with
19 the incident was the worst two hours of my career.
20 During my many years' service, I have experienced other
21 major incidents involving similar levels of focus,
22 commitment and volume of work. However, the unfolding
23 and deteriorating circumstances experienced by the
24 trapped persons who were communicating with the control
25 room created an intensity that I have never previously

1 experienced and placed my staff and I in a unique
2 situation."

3 Does that reflect what you thought at the time and
4 today?

5 A. It does indeed.

6 Q. If we start with an overview of the situation in the
7 control room. I can take you to it if necessary, but
8 the control report tells us that there were 13 control
9 officers on duty at the time of the first call.

10 A. That's correct.

11 Q. And I think that at 16.23 or so you spoke to somebody
12 called Peter May about the possibility of extra help
13 because of the developing incident?

14 A. We had two supervisors at our fall-back control, as
15 we've mentioned earlier. They were at the fall-back
16 control for resilience purposes, and I believe they were
17 also involved in working within the command support
18 centre at change of operational shifts. The
19 operators -- these two operators were basically there
20 for resilience should we need to leave our base control
21 room so there would be some level of protection for the
22 public of London. They could see on screens the call
23 rates that we were receiving. They could possibly do
24 some work that would have assisted myself and -- I'm not
25 sure who initiated the conversation, but I believe it

1 was Mr May at Stratford who asked if they could be of
2 any assistance to me. I assessed the situation and
3 bearing in mind we were already receiving calls that
4 warranted fire survival guidance, that I could keep
5 control of -- ensure that we were able to pass
6 information to the fire crews, if there was a chance
7 that the two supervisors at Stratford had picked up
8 a fire survival call and couldn't communicate that
9 information to -- to myself or my other two supervisors,
10 that information may never have got to the fire ground.
11 So I made that decision fairly early on, that all
12 emergency calls that were coming in at that point were
13 controlled from the main control room.

14 Q. Your statement says that one of the first things you did
15 was to recall four control officers who were on
16 a half hour break.

17 A. Yes, we were --

18 THE CORONER: Mr Simmons, just let Mr Maxwell-Scott take it
19 step by step. Don't run ahead too much.

20 A. Sorry.

21 MR MAXWELL-SCOTT: Is that right, that you got back from
22 their break early four control officers to be available?

23 A. I pressed the recall button to alert them to come back
24 urgently.

25 Q. We're told in the control report that there were no

1 other significant incidents in progress before or
2 immediately after the initial Lakanal call?

3 A. There were other incidents --

4 Q. Of course.

5 A. -- but not what you would call significant to the
6 general scheme of things.

7 Q. Were you in the control room when the first call came
8 in, and if not, when did you go into the control room?

9 A. I was in the control room from the time of the first
10 call until I was relieved by the oncoming watch at
11 around about 18.30 that evening.

12 Q. We've talked about the reference information file which
13 a control operator can bring up on their screen if they
14 wish. From what I have seen of statements given by
15 those working in the control room at the time, nobody
16 expressly says that they did call up the reference
17 information file and used it. That doesn't, of course,
18 mean that they didn't, but can you assist with your
19 direct knowledge as to whether anybody did, in fact, use
20 it?

21 A. I cannot say categorically that anybody used it. I was
22 not able to monitor at least seven or eight people
23 taking calls. It is a physical impossibility and I do
24 not have access -- I did not have access to the screen
25 on which it would have been displayed.

1 Q. So you can't say one way or the other?

2 A. No.

3 Q. If I could ask you then to look at some passages in the
4 transcript of the fire survival guidance call between
5 Catherine Hickman and an operator at brigade control.
6 This is in the jury bundle at tab 17. Do you have that?

7 A. I do.

8 Q. The call started at 16.21.27. The operator said:

9 "Fire Brigade?"

10 Catherine Hickman said:

11 "Fire Brigade, Lakanal House."

12 The operator said:

13 "Okay, Lakanal, is it?"

14 Catherine Hickman said:

15 "Yes, I'm at -- I'm at flat 79 and the flat below
16 me, there's flames coming out of -- coming out the
17 window."

18 Then the operator said:

19 "Right, okay. You need to stay in your -- in your
20 flat."

21 Do you agree that that advice is given without, at
22 that stage, any discussion about what the conditions are
23 in the flat?

24 A. Yes.

25 Q. Then if we continue a little further down the same page,

1 the operator asks for the flat number, which is
2 something they're trained to do, isn't it?

3 A. It is indeed.

4 Q. And they get the flat number, 79, and then the operator
5 asks:

6 "Is there any smoke coming into your flat?"

7 The answer is:

8 "Well, I'm going to go upstairs and close my
9 windows. Yes, there's -- there's smoke coming up.
10 There's loads of smoke."

11 And the operator asks:

12 "Is there smoke coming into your door -- under your
13 door?"

14 Catherine Hickman said:

15 "Um, yes, I can smell the smoke, yes."

16 So that would have been an opportunity, do you
17 agree, to start considering whether or not the flat was
18 the best place for Catherine Hickman to be?

19 A. It is, but there was no indication of what door the
20 smoke was coming under.

21 Q. Then --

22 A. We didn't know -- from this, you don't know exactly
23 where she is in the flat. Was it the street door? Was
24 it a bedroom door? We had no indication of that.

25 Q. If you go over the page to page 2, towards the top,

1 Catherine Hickman said:

2 "Shall I go on the balcony outstairs?"

3 The operator said:

4 "Are you on a mobile?"

5 Catherine said:

6 "Yes."

7 Then the operator said:

8 "Right, okay, first of all, stop the smoke coming
9 into your flat from -- from the door."

10 Would you agree that the call is then moving on to
11 discussion of where the best place in the flat is going
12 to be and does so without engaging in a discussion about
13 the nature of this balcony?

14 A. Looking at the transcript, yes.

15 Q. You've given your evidence already about the fact that
16 it wasn't perhaps the practice in the control room at
17 the time to ask detailed questions about escape routes?

18 A. No, and my interpretation of that balcony would -- would
19 have been, in a block of flats, a balcony for that sole
20 flat, for that sole premises, rather than an escape
21 balcony. It is an assumption I think the majority of
22 people -- certainly I would have made. The possibility
23 that the balcony is a balcony that you -- you sometimes
24 get separate from other -- rather than a communal
25 balcony.

1 Q. Well, Mr Simmons, I know you're not the operator on this
2 call, so all we can do is look at some passages in it,
3 and that's the context, but isn't the reality that
4 without asking one just doesn't know what sort of
5 balcony it is?

6 A. I agree with you there.

7 Q. I've taken you to the passage in the 1994 training about
8 maisonettes. Of course, we don't yet know this is
9 a maisonette but it does refer there to alternative
10 escape routes being provided sometimes on different
11 levels. I refer to that just to reflect my point that
12 until one asks questions about the nature of the
13 balcony, one simply doesn't know.

14 A. I agree with you.

15 Q. Then on page 3, at 16.23.35, Catherine Hickman said:
16 "Yeah, but there's fire coming through my
17 floorboards now and smoke."
18 The operator said:
19 "Right, okay."
20 Catherine said:
21 "What shall I do? Shall I get out?"
22 Would you agree with me that that passage at least
23 raises the possibility that we're now in a scenario
24 where there is not only smoke in the flat but also fire
25 in the flat?

1 A. It raised that possibility.

2 Q. About six lines further down, Catherine Hickman says:

3 "I'll go up -- sorry, I'm coming upstairs."

4 So there's reference there to the fact there are two

5 floors within the flat. Do you agree?

6 A. Yeah, at that point, yes.

7 Q. Again, at the bottom of that page, there's reference to

8 the balcony again. If I might just take you back to

9 a point on page 1 that I omitted to ask you about. At

10 16.21.46, Catherine said:

11 "Yes, yes, but the fire's below me in the flat

12 below."

13 I draw attention to that simply because it gives

14 an indication of her location, for the record.

15 A. Yes, it does.

16 Q. It places her in relation to the position of the flat

17 that was on fire.

18 So if we go back, then, to page 4. Towards the

19 bottom of the page, 16.25.02, Catherine Hickman said:

20 "Yeah, the room downstairs is full of smoke."

21 And she's obviously upstairs at this point, and the

22 operator said:

23 "Right, okay. Now I want you to stay there.

24 I don't want you to try and move, okay?"

25 Then over the page, page 5, the operator said:

1 "Are you on the balcony? Is the balcony at the
2 front or the back?"

3 Catherine Hickman says she was indoors. Then we get
4 the operator doing what I think they're trained to do,
5 which is to try and get more precise information about
6 location because it could be useful for firefighters
7 trying to rescue.

8 A. If I can -- if I remember correctly, we were already
9 passing the information at the very early stage, the
10 flat number. One of my supervisors was performing that
11 role of gaining information and passing it to the radio
12 operator to get to the fighters at the incident.

13 Q. So here we get:

14 "What floor are you on there?"

15 "I'm on the 11th floor."

16 The operator repeats back:

17 "The 11th floor."

18 Catherine Hickman says:

19 "And the flat, I think it's on the 9th floor, which
20 is the one below me."

21 The operator says:

22 "Yeah, okay."

23 And then Catherine says:

24 "It's a maisonette. I've got two floors:

25 "So that is clearly establishing that it's

1 a maisonette at that point."

2 A. At that point, yes.

3 Q. Then, on page 7, towards the top of the page, four lines
4 down, Catherine Hickman said:
5 "Um, um, the flat's filling up with quite a lot of
6 smoke, I mean."
7 And the operator said:
8 "Right, okay, but you're on the balcony, are you?"
9 Would you agree with me that that would have been
10 another opportunity to ask about the nature of the
11 balcony?
12 A. It would have been an opportunity, yes.

13 Q. Then if we go on to page 9, at 16.30, Catherine Hickman
14 said:
15 "Should -- should I go downstairs or anything in the
16 corridor?"
17 The operator said:
18 "No, I don't want --"
19 Catherine Hickman said:
20 "No?"
21 And the operator said:
22 "No, don't go out the flat."
23 She explained:
24 "If you open the door, you don't know what's the
25 other side, and neither do I at this stage."

1 That, of course, would have been true. She would
2 not have known what was outside, but would you agree
3 that there's the possibility that it is going to be no
4 worse and possibly better than the situation in the
5 flat, particularly if the flat has now been affected by
6 both smoke and fire?

7 A. It was my understanding from the information that we
8 were getting from all the calls from people in the -- in
9 Lakanal House, and the other fire survival calls, that
10 the corridors and other flats were involved in -- in the
11 fire, and it was -- in my understanding, it would have
12 been difficult to have given any advice that could not
13 have -- might not have led to any danger.

14 Q. Then if you go to page 11, at 16.32, Catherine Hickman
15 mentioned a fire escape, I think for the first time,
16 when she said:

17 "Okay, will they come on the balcony where the fire
18 escape is? Oh go, it's really -- it's like orange."

19 The operator said:

20 "Okay, so can you open the kitchen door?"

21 Catherine Hickman said:

22 "No, I didn't. It's orange. It's orange
23 everywhere. No, I can't open any windows."

24 The operator said:

25 "You can't open any windows? Can you get on the

1 mini-balc -- is there any balcony you can go back to or
2 is there too much smoke to go through?"

3 Catherine Hickman said:

4 "Um, well, there's -- it's a -- I can go to the
5 stairwell because I'm right next to the stairwell."

6 The operator said:

7 "I don't want you going out on the landing because
8 there's -- we don't know what's on the other side of the
9 door, Catherine."

10 This is 16.33. Would you agree that that was
11 an opportunity to explore whether there was some
12 relationship between the phrases "balcony" and "fire
13 escape" and "stairwell" used by Catherine Hickman?

14 A. I have to agree with you, yes.

15 Q. Then if we go to page 14. I draw this page to your
16 attention because this is the page on which we see
17 Catherine Hickman trying to open a door -- we assume the
18 front door -- and for whatever reason she wasn't able to
19 open it. She says in the middle of the page, 16.36.24:

20 "I don't know. It's banging and I tried to pull the
21 door and it, like, wouldn't open."

22 I think it's fair to say that from then on, the
23 focus of the call is on fire survival guidance about
24 where is the best place to be in the flat. I won't take
25 you to any further passages in it but I would say, in

1 general terms, that one sees a number of examples of the
2 operator saying positive things like "firefighters are
3 on their way to you", "they're nearly there", "they'll
4 be there very soon", "you're going to survive". Can
5 I just make it clear through you that when the operator
6 said that, that was entirely in accordance with her
7 training and what you would have expected?

8 A. I believe that was the case, and I believe that all the
9 way through the operator was attempting to keep the --
10 Catherine Hickman safe. We're -- we're looking at these
11 in hindsight with the printing clearly in front of us,
12 and it's easy to say, "Yes, this should have happened,
13 that should have happened", but in the cold light of
14 day, with 60 calls coming in, other fire survival
15 guidance calls being taken, with the information that we
16 were all receiving, we were -- we were doing all we
17 could to keep people safe.

18 Q. I'm going to ask you now about two short 999 calls that
19 started at a similar time to that involving
20 Catherine Hickman. I'll ask you to look firstly at
21 page 732 of the advocates' bundles. Mr Clark will need
22 to help you with that. It's in file 2. (Handed) This
23 is called call 5 because I think it's the fifth 999 call
24 made to brigade control, and you see the first thing the
25 caller says is:

1 " Yeah, hello, there's a fire burning on top of my
2 flat."
3 Four lines further down, they say:
4 "I'm on the 9th floor."
5 They say at the bottom of the page:
6 "The house burning's on the 11th floor."
7 That is clarified over the page -- this is the
8 caller's belief, of course. The operator repeats back
9 for confirmation:
10 "The fire is on the 11th floor."
11 And we've been told the caller is on the 9th floor.
12 Then, on 734, the call draws to an end with the
13 operator saying:
14 "We are on our way. Can you get out all right?"
15 The caller said:
16 "Thank you. Yeah, I'm talking outside the house
17 now."
18 Then if I ask you to look at call number 12 at 747.
19 About the fifth line down, the caller says:
20 "Southampton Way, a flat. I'm in a block of flats.
21 I'm up on 9th floor."
22 Two pages on at 749, in the fourth line, the caller
23 says:
24 "I want to get out of this block."
25 The operator says:

1 "Right. You need to speak to me. Hello. Are the
2 Fire Brigade there?"

3 There's shouting in the background. The caller
4 says:

5 "Go, go. [Something inaudible]. Yeah, the fire,
6 the fire engine's here."

7 The operator says:

8 "They're there?"

9 The caller says:

10 "Yeah, they're there."

11 The operator says:

12 "Okay, okay. Just leave the building."

13 What I wanted to ask you to comment on, if you can,
14 is whether it might be thought that there is a variation
15 in approach in those three calls -- the beginning of the
16 Catherine Hickman call and then the two short calls I've
17 just taken you to -- all of which started at very much
18 the same time.

19 A. I would say variation in the operators taking the call
20 and variation in the callers. I think the principles of
21 fire survival training they would have had would have
22 been the same but there is a variation in the callers
23 and a variation in the operator, because it is -- it is
24 human nature.

25 Q. All three calls involve a person in a flat which is not

1 the flat where the fire started. Do you agree?

2 A. I agree.

3 Q. In fact, the only one of those three callers who says at
4 an early stage that their flat is affected by smoke is
5 Catherine Hickman?

6 A. That's correct.

7 Q. Let me ask you next about the concept of "persons
8 reported". If I could ask you to have a look at
9 page 324.

10 A. Is that in the same? (Handed)

11 Q. This is a transcript of a conversation between you and
12 somebody called Darren Munro at 16.45. About seven
13 lines or so down, you say this:

14 "They haven't made them persons reported."

15 What, if anything, was the significance of what you
16 were saying there about the fact it wasn't persons
17 reported?

18 A. It simply means that the officer in charge of the
19 incident hadn't sent back a confirmation of persons
20 reported to brigade control. Brigade control were
21 working and doing everything associated with a persons
22 reported fire. It's just that we hadn't received
23 a message from the ground. Ambulances had been ordered
24 and all the necessary officers and all the notifications
25 had been done, as it were, because of the fire survival

1 calls, and in this case it just wasn't a message that
2 originated from the fire ground.

3 Q. Then a point in your witness statement at page 492,
4 please. The final paragraph says:

5 "It was apparent during the early stages of the
6 incident that there were some difficulties in getting
7 a radio response from the scene, which was likely to
8 have been the result of competing pressures as the
9 incident rapidly developed. Communication with the
10 scene was predominantly one way and we only received
11 limited information from the incident. These are known
12 as informative messages and are recorded in the incident
13 report. There were only two during the first hour,
14 timed at approximately 16.46 and 17.21."

15 Pausing there, communication was predominantly one
16 way, in other words from brigade control to the fire
17 ground?

18 A. Yes. We'd had the assistance messages to request the
19 additional resources, which we responded to, and the
20 majority of the time, apart from those two messages, we
21 were relaying information regarding flat numbers
22 involved, persons involved, to the crews on the scene
23 via one of the pumping appliances and then one -- via
24 one of the command units.

25 Q. We've had a number of witnesses that have given evidence

1 in this court who were at the fire ground. We've gone
2 through communications from brigade control to
3 appliances and command unit 4, so I'm not going to go
4 through those with you. I just acknowledge with you
5 that there were a number of communications about flat
6 numbers and people trapped.

7 A. There were very -- I assigned -- the radio channel
8 covering south of London, I gave instructions for that
9 radio operator to do nothing else but deal with radio
10 traffic on that channel, do no other jobs, and one of my
11 supervisors -- I believe it was Mr Real -- acted as
12 a runner, relaying information from the call takers that
13 were receiving the fire survival calls and information,
14 collating it and relaying it via radio -- via the radio
15 operator to the incident, and there should be recordings
16 of every piece of information that we passed to those
17 vehicles and those officers in the transcripts.

18 Q. I can assure you that we have looked at a number of
19 those transcripts with Paul Real's name featuring very
20 prominently.

21 Going back to the statement at 492, you say:

22 "Having received the second informative message, it
23 was apparent to me that the incident had still not been
24 declared as persons reported despite the fact that
25 multiple rescues were required and the London Ambulance

1 Service had declared it a major incident. I therefore
2 took it upon myself to declare it a persons reported
3 incident."

4 Firstly, were you surprised that nobody else had
5 done that yet?

6 A. I was very surprised, but I had noticed a few times in
7 recent years, when we'd told the crews attending that
8 there were people believed involved, they might have
9 sent the message requesting assistance and they might
10 have said one person rescued but they hadn't sent the
11 message with the assumption that it was persons reported
12 anyway, because we -- control had received information
13 that people were involved. But it was -- it's normally
14 from the incident ground, irrespective of the
15 information that we pass to them.

16 Q. Did it make any difference to what was going on in the
17 control room whether it was persons reported or not?

18 A. The only reason I declared it persons reported --
19 because if I put that -- if an operator puts that code
20 on the incident report, it will generate a series of
21 prompts to the control room and it was a way of checking
22 that we had done what was required, and they were -- the
23 rationale to tidy up the incident and to check -- my
24 check that my staff, my watch, had done the work that
25 was required of them.

1 Q. I think it was made persons reported by you at
2 1723 hours?

3 A. Yeah, which is about an hour into the incident, when I'd
4 asked one of my supervisors at the fall-back control to
5 go through the incident to check whether we'd forgotten
6 anything, whether we hadn't done anything, because I was
7 aware at that stage we were going to have a major
8 investigation because of the nature of the incident, and
9 there were obviously delays in our call answering.
10 Because of the number of calls that we were receiving,
11 we were well outside our target time for call answering,
12 call-handling statistics, so I just wanted to check, and
13 that's when it became apparent -- and I just wanted to
14 tidy up to make sure control had done everything, and
15 I chose not to suggest it to the incident commander
16 because I felt the incident commander was inundated
17 anyway and it wouldn't have gained any benefit, because
18 everybody was aware that people were involved.

19 Q. Then a point of detail on page 493 of your statement.
20 The short five-line paragraph towards the bottom of
21 what's on the screen, the penultimate paragraph, says:

22 "At the time of the incident, it was our
23 understanding within the control room that Lakanal was
24 an 11 storey building and they were unaware of the
25 maisonette design or that there were exterior escape

1 routes."

2 Firstly, just dealing with what you personally were
3 or were not aware of, and putting to one side what your
4 colleagues in the control room may have known, does that
5 reflect your understanding at the time?

6 A. It does, because I was very surprised when I found out
7 subsequently that there were maisonettes involved.
8 The -- all the information that -- where I could have
9 gleaned -- all the recordings and incident reports were
10 impounded before I had a chance to even monitor them and
11 some of the transcripts -- or the transcript of the call
12 we've just been through, I saw for the first time last
13 week. I hadn't had the opportunity to listen to them.
14 They'd been impounded because of the police
15 investigation. So I was unable to check, debrief, in
16 any way, shape or form.

17 Q. So you wouldn't, to be fair to you, have known exactly
18 what your colleagues might have gained from individual
19 calls they were on?

20 A. No.

21 Q. You've seen with me now that the operator speaking to
22 Catherine Hickman was told that they were maisonettes,
23 for example?

24 A. She was. Yes, I know that now. I am not sure whether
25 it still would have had any bearing on how we dealt with

1 the situation from a control point of view.

2 Q. It's simply a point of detail on the statement.

3 My final question is this: looking back on your role
4 that afternoon as the watch manager in the control room,
5 what single additional thing do you think would have
6 most helped you to carry out your tasks in the control
7 room that day?

8 A. The ability to have got that information to the scene
9 and maybe -- just maybe -- if we'd been able to get it
10 quicker, which I doubt, maybe there'd have been
11 different outcomes. I don't know.

12 Q. Thank you very much. Those are my questions.

13 THE CORONER: Thank you. Mr Hendy.

14 MR HENDY: Madam, I'm likely to be some time. Would you
15 want to take a break?

16 THE CORONER: Would that be a sensible time to have a break
17 then? All right. Thank you very much. So, members of
18 the jury, we'll have a five minute break. Do leave your
19 papers behind if you would like. Thank you very much.

20 Mr Simmons, I'll give you the same warning as I gave
21 you during the break at lunchtime: please, during the
22 short break, don't talk to anyone at all about the case.
23 Could you be back in five minutes please?

24 A. Sorry?

25 THE CORONER: Could you be back in five minutes?

1 A. Yes, sure.

2 (3.15 pm)

3 (A short break)

4 (3.22 pm)

5 THE CORONER: Thank you.

6 (In the presence of the Jury)

7 THE CORONER: Thank you. Yes, Mr Hendy.

8 Questions by MR HENDY

9 MR HENDY: Madam, just to keep you and the jury informed,

10 I understand other advocates will have questions after

11 me, and I'm likely to be a little bit of time, so

12 I think Mr Walsh has sounded out with Mr Simmons whether

13 he can come back tomorrow. If I'm still on my feet

14 shortly before 4 o'clock, shall I find a convenient

15 moment?

16 THE CORONER: Yes, please. Could you finish before 4? That

17 would be helpful, thank you.

18 MR DOWDEN: Mr Simmons, my name's Hendy. I represent some

19 of the bereaved families. I wanted to ask you, first of

20 all, about the three screens that each operator has in

21 the control room that you described at the beginning of

22 your evidence. Let's take it in reverse order. The

23 screen on the right is the one with the mapping system

24 on it; correct?

25 A. That is correct, yes.

1 Q. And that also is like anybody's computer. It gives you
2 access to the internet, the intranet and email and so
3 on?

4 A. That is correct.

5 Q. Presumably, you can go onto Google Earth and look at the
6 mapping information provided by Google?

7 A. I'm not sure whether that was available to control.

8 Q. In July 2009, I don't suppose it was then the practice
9 to bring up the street scene that's available on Google
10 to look at any particular building that was on fire?

11 A. To my knowledge that was not available to control.

12 Q. Not available generally -- I can't remember what it was
13 like in July 2009 -- or just not available to control?

14 A. To my knowledge, it was not available to control. Our
15 IT section made available certain things but I could not
16 be certain -- and to my knowledge it wasn't available to
17 us.

18 THE CORONER: So you didn't have unlimited access?

19 A. No, definitely not.

20 MR HENDY: Can we assume that you didn't have access to
21 plans of buildings or schematic drawings of buildings?

22 A. We had no access to any plans for any premises.

23 Q. That would obviously be helpful for the future, would it
24 not?

25 A. It might -- might be helpful for the future. It might

1 also delay attendances if we look at plans before
2 mobilising.

3 Q. The left-hand screen, you tell us, records all the calls
4 into and out of the control room?

5 A. The left-hand screen is the switchboard. It is
6 a touch-screen switchboard and the calls that are
7 transmitted or received through that are recorded
8 remotely.

9 Q. Just explain that to us. These are telephone calls or
10 radio messages?

11 A. Every piece of speech traffic through that console when
12 it's live is recorded.

13 Q. Right.

14 A. Radio or telephone.

15 Q. Does a summary of it appear on that screen, of what was
16 said?

17 A. You have an instant replay tape recorder that I think
18 recorded around about 30 minutes' tape, so in a busy
19 period of time, it's overwritten very quickly. I did
20 not have access to the multi-track tape recorders which
21 are remote -- remote from the control room.

22 Q. I'm just trying to help the jury visualise what that
23 screen looked like. You have a touch-screen keyboard,
24 so if you want to dial a number, presumably --

25 A. There were a certain number of keys that were what they

1 called hot keys. There were a number that were
2 programmed in. There was a telephone keypad to dial
3 numbers that weren't available on the keys. It was
4 a pure switchboard for receiving and making calls.

5 Q. Is there a log of the calls that have been made and
6 received on that screen as well?

7 A. Not available to the control officer. Remotely again,
8 there's a log of the calls.

9 Q. And that log is simply of the numbers dialled, or from
10 which calls have been dialled?

11 A. It will be a log of all the numbers we've -- received
12 calls and made to.

13 Q. But that log wouldn't contain any of the content of
14 those calls?

15 A. No, that would be on the voice recorders.

16 Q. That would be on the tape recorders?

17 A. That would be -- that would be on the voice recorders.

18 Q. Right, and then in the middle you have what you call the
19 mobilising screen, which contained information from
20 callers which was typed up by the operator?

21 A. That's correct.

22 Q. The information from callers calling into control by
23 telephone?

24 A. What happens is when a call is made to the
25 London Fire Brigade, as soon as that call is answered

1 within the control room, a screen format called a new
2 incident frame is displayed, which enables -- which
3 registers the call number for that call and enables the
4 operator to type in relevant call information in
5 selected fields: street, thoroughfare, building name.

6 From the information put in, the operator then
7 commands the system to do a search to find the
8 appropriate record for the thoroughfare. On selecting
9 the thoroughfare and with the input of a specific code
10 for the type of incident they're attending,
11 an appropriate attendance is displayed.

12 Q. An appropriate ...?

13 A. Attendance, number of fire engines --

14 Q. Right.

15 A. -- is displayed, and normally that is dispatched
16 immediately.

17 Q. When you say it's dispatched, dispatched by sending the
18 message --

19 A. Sending the message from the control --

20 Q. Just let me finish, sorry, Mr Simmons. Dispatched by
21 sending the message which has been typed onto the screen
22 or dispatched by making a separate radio call?

23 A. It's dispatched to the appropriate resource, the
24 appropriate fire engine. If it's in the station, it
25 appears on the teleprinter at the station and the call

1 bell activates. If the appliance being ordered is off
2 its station, available by radio, a copy of that message
3 will go to the radio operator, who will then verbally
4 order that fire appliance to the fire.

5 Q. Right. So in your control room, you have, as we've seen
6 in the photographs -- I won't call them up again but we
7 have all the operators with their sets of three screens,
8 but there's also one or more people who are simply radio
9 operators?

10 A. Under normal circumstances, with a normal complement of
11 staff, we'll have three radio operators, one for each of
12 the three nominal areas of the brigade: north east,
13 north west and south.

14 Q. So if I'm sitting in the ordinary operator's seat, the
15 call comes in by telephone that there's a fire in
16 a particular building. I punch the relevant buttons and
17 a message comes up recording where that is and how many
18 appliances automatically ought to go. That message then
19 goes off to the teleprinter in the nearest fire station,
20 and if I then realise that it's -- the appliance is
21 off-station, I then shout over to the radio operator and
22 say, "Put out a message for E35"?

23 A. The message is automatically sent to the appropriate
24 radio operator for that channel.

25 Q. Thank you very much.

1 A. It's a visual display.

2 Q. Right.

3 A. But as a belt and braces, it was customary practice to
4 tell the radio operator: "You've got an order in",
5 because it makes it a little bit more -- a little bit
6 quicker.

7 Q. Of course.

8 A. Especially if there's something important in that
9 message, because they go in -- they can go into a queue
10 like a pack of cards, one under the other.

11 Q. So on that screen is a rolling record of the calls that
12 have come in and the action that's been taken in
13 consequence of them?

14 A. Yes, you can say it that way, yeah.

15 Q. When a command unit is set up at a fire, is that
16 information communicated to the computer on the command
17 unit?

18 A. I can't remember exactly how they get the information
19 but I think they're able to get into a system called
20 MOBIS, where they can transfer it onto the command
21 planning system at the scene.

22 Q. So they can access all the calls that have been made --

23 A. I don't know whether they can access all the calls but
24 they can get information from the call.

25 Q. I wonder if you can just help the jury to see whether

1 there's anything like the rolling log that you've
2 described. Could we look, please, in the advocates'
3 bundle, in the second volume, at page 612. We see that
4 that's headed "LFB radio messages as displayed on
5 mobilising logs for incident, Lakanal, Havil Street".

6 I think the jury have looked at the second entry and
7 other entries on that page. Is that the sort of log
8 that would appear on the screen in control?

9 A. There will be an incident report for every incident
10 attended, and these are extracts from that original
11 incident report, from my recollection.

12 Q. But how does that relate to what you would see on the
13 computer screen in the control room? Are you saying
14 simply that it would have this stuff on it but it would
15 also, of course, have any other incidents which occurred
16 at the same time?

17 A. On the incident report that I would see for
18 Lakanal House, there would be all these messages, plus
19 actions that were taking place in control relating to
20 informing water board, informing police, which are not
21 on this incident.

22 Q. So --

23 A. This is an extract of an incident report.

24 Q. I see. So it will be fuller than this?

25 A. Considerably fuller than this.

1 Q. This has been taken from it?

2 A. Yes.

3 Q. Then just help me with this: if you look earlier in that
4 volume at page 540. This is headed "Conversation
5 between CRO [and then the name of the lady] and command
6 unit 4", and it has the date of the call and the time of
7 the conversation and so on. We see there a typed
8 transcript, as it appears to be, of a conversation.
9 "Hi" and "hello" and "okay" and all the rest of it.
10 That sort of transcript wouldn't appear in the control
11 room unless and until somebody typed up one of the tapes
12 that you talked about; am I right?

13 A. If control unit 4 were given a message, that would be
14 typed onto a different format and action would have been
15 taken, and the incident report would -- the proper
16 incident report should -- should show that message being
17 recorded and if any action was taken on it.

18 Q. But for the operator to type that up, they'd obviously
19 have to have a quiet couple of minutes to listen back to
20 the tape. They wouldn't --

21 A. No, they would type it verbatim from what was being
22 said, because they could call up an incident --
23 a message frame where they could type the details onto
24 that message directly.

25 Q. So this would be typed instantaneously as the

1 conversation is taking place?

2 A. The details of a message, yes.

3 Q. We can put that volume aside. Can I ask you to look in
4 volume 4, please, at page 1790. This is an annex to
5 a report that was compiled some time after the Lakanal
6 fire. It records "Operationally urgent calls related to
7 the Lakanal incident" and begins:

8 "This appendix should be read in conjunction with
9 the outline of mobilising procedure in section B."
10 Then it gives you some keys and so forth.

11 Now, the information that's recorded there, is that
12 something that would appear on your middle computer
13 screen?

14 A. It would appear on the incident report. The status
15 changes would be on a separate format by the radio
16 operator or by somebody taking the status change from --
17 a telephone message from a station manager or group
18 manager.

19 Q. When you talk about the incident report, is that
20 something that's compiled at the end of the incident?

21 A. No, that's an ongoing -- an incident report is
22 an ongoing log created automatically from the very first
23 time the control officer answers, "Fire Brigade",
24 because each emergency call immediately answered is
25 given a log number and anything that happens on that

1 incident is automatically attached to that incident log.

2 Q. The computer collects that information together and
3 lists it in chronological order?

4 A. Because -- sorry, there's a unique reference number per
5 incident and all that is recorded automatically.

6 Q. So let me just get this clear: the information that we
7 see recorded on that page and on the following pages
8 would be accessible in the control room but not
9 necessarily on one of the three screens in front of the
10 ordinary --

11 A. I would display it on the middle screen.

12 Q. You would ...?

13 A. I would be able to display it on the middle screen, but
14 there would be a lot of information and these -- the
15 majority of these status changes logs would be at the
16 bottom of the incident report, which could be 30, 40,
17 50 pages long in a case.

18 Q. As we look at that page, for example -- I don't think
19 the jury have seen that page before, but if you look to
20 the time in the left-hand column of 16.25.45, we see
21 that there's an RT, radio transmission, control officer
22 to appliance E351, information passed, flat 79,
23 information regarding occupant, and E351 is status 3.
24 We can see other references to flat 79 at 16.28.54 and
25 16.33.00.

1 A. My -- my recollection of the incident is that we were
2 having great difficulty getting responses from the
3 initial crews on the fire engines.

4 Q. I understand that but at the moment I'm just asking you
5 what information was collected by control and available
6 to the operators, and you tell us that this information
7 was, that indeed they'd have more information than this?

8 A. The incident report would -- would display exactly the
9 information that we had.

10 Q. Again, in relation to those pages, as far as you're
11 aware, would the command units at the fire ground have
12 access to that information if they required it?

13 A. I don't know on that. I don't know what the command
14 units can obtain.

15 Q. Then if I can ask you to go to page 1676, please. One
16 moment. I'm not sure I have the right page. Yes,
17 I have, yes: 1676. This is a risk assessment carried
18 out by the London Fire and Emergency Planning Authority
19 in October 2006 in relation to Lakanal House. Have you
20 ever seen this before?

21 A. No.

22 Q. Would risk assessments of this kind be accessible to the
23 control room?

24 A. No.

25 Q. The information that's in the box at the bottom, that

1 this was a residential block of 14 floors, maisonettes
2 on floors 1, 3, 5, 7, 9, 11 and 13, all maisonettes over
3 two floors, that's not information that would have been
4 accessible in the control room, as I understand it?

5 A. If there was an individual address record for
6 a premise(sic) or a street, that may have been included
7 as an operational note -- a little -- small note to the
8 crews attending and it would be displayed to control.
9 But that's a supposition. To my knowledge, there was no
10 individual record for Lakanal House on the mobilise
11 system, only a thoroughfare, and so I do not believe
12 there was any indication.

13 Q. Now, this fire, as you've explained in answer to
14 Mr Maxwell-Scott, was exceptional in your experience,
15 and it was a horrendous experience both for you and your
16 control staff, was it not?

17 A. I believe so, yes.

18 Q. I don't want to suggest anything other than that all of
19 you did your level best to save the lives of those who
20 unfortunately and tragically died. Okay? So I want you
21 to bear that in mind in the questions that I'm going to
22 put to you. But lessons have to be learned from every
23 adverse experience and I want to ask you something about
24 that. First of all, what lessons do you think control
25 learned as a consequence of the Lakanal House fire, if

1 any?

2 A. I believe there was a lot of personal lessons learned,
3 that -- for me, there was no -- there was now no longer
4 such a thing as fire survival guidance, because from
5 what I was led to believe by my training, by my previous
6 knowledge, went out the window with this incident.
7 Where the procedure could be in place, it would be ideal
8 if I could have given all those involved in taking the
9 fire survival calls a supervisor or somebody to help
10 them directly, but that would have meant, I think, at
11 least six supervisors on top of the staff I had
12 available to me, and that's an impracticality.

13 Q. Was there a clash between your personal experience of
14 how to advise a fire survival guidance person and what
15 the written policy was?

16 A. I don't believe so, no, sir.

17 Q. You see, in your statement, if we could just have that
18 up, at page 490, at the end of the second paragraph that
19 we looked at earlier -- if you go five lines from the
20 end of the first main paragraph on that page --

21 THE CORONER: Sorry, could you just stop a moment. Do you
22 have that? Page 490.

23 A. Thank you very much, madam. I've got it now.

24 MR HENDY: The main paragraph begins:

25 "I received my initial basic training ..."

1 And then at the end of that paragraph, if you go
2 five lines up, there's a line that begins:

3 "But callers are not routinely questioned about
4 access to escape routes."

5 And then this:

6 "There is a strong expectation among control room
7 staff that fire crews will reach persons receiving fire
8 survival guidance."

9 That was your experience, wasn't it?

10 A. It was.

11 Q. And that was the understanding of all the operators in
12 the control room, that what you have to do is keep the
13 fire survival guidance people in place and they will be
14 rescued?

15 A. It -- on face value, what you're saying is, with
16 hindsight, correct, but at the time things happened so
17 quickly when an emergency call was being made like
18 that -- there were lots of things going on and the
19 operators were giving advice and guidance in extremely
20 stressful conditions.

21 Q. Understood. Mr Simmons, that is simply not doubted.
22 I can't imagine how awful it must have been to be in
23 that control room at the time, and I'm sure the jury
24 share that feeling. But let me just take you to the
25 bottom of 493, please. After the passage there that

1 Mr Maxwell-Scott read about the unique situation in
2 which you and your colleagues found yourselves, at the
3 bottom of the page you say:

4 "This culminated in a state of disbelief when we
5 discovered that, contrary to our unflinching belief, the
6 persons had not been rescued -- including
7 Catherine Hickman, who was on the phone to the operator
8 right up to the point when she lost consciousness."

9 I mean, that was it. It wasn't just your experience
10 telling you that people were going to be rescued; it was
11 an unflinching belief that that was what was going to
12 happen, if you kept them talking.

13 A. Because on every other occasion I knew of fire survival
14 guidance involving my watch and myself, that is what had
15 happened, and the situation was such that we believed
16 with the training we'd been given, with the knowledge
17 that we were given by experienced fire safety officers,
18 that it was unlikely that a fire in a flat would spread
19 to another flat in any block of flats. That was behind
20 that statement.

21 Q. Well, you say that was the training that you were given,
22 but I have to say to you, Mr Simmons, it's exactly
23 contrary to the training that you were given, isn't it?

24 A. I don't believe so, sir.

25 Q. Let's just have a look. Mr Maxwell-Scott's covered this

1 pretty thoroughly but let me just take you to a couple
2 of documents. 1703 in volume 4 of the advocates'
3 bundle, Mr Clark, if you wouldn't mind.

4 This, again, is an appendix from the
5 London Fire Brigade investigation into the Lakanal fire,
6 and it starts with emergency calling handling
7 techniques, a fire survival --

8 THE CORONER: Just wait a moment.

9 MR HENDY: Forgive me.

10 If you go to 1704, we can see that this is
11 "Emergency call handling techniques, fire survival
12 guide" and we know that it's from 1994.

13 Mr Maxwell-Scott took you to some passages in it, and
14 you told the jury that it didn't materially differ from
15 the training that was given in 2010; am I right?

16 A. That is my understanding, yes.

17 Q. Let me take to you a couple of passages. Can we start
18 with 1711, please.

19 A. Did you say 1711?

20 Q. 1711. Under the heading "6. Assessing the situation",
21 it says:

22 "In order that the appropriate advice can be given,
23 the following information will need to be obtained if it
24 is not immediately apparent:

25 "Can the caller escape to safety immediately? If

1 not, what is preventing this?"

2 Then it makes some suggestions:

3 "What type of property is involved? ... Which room
4 is the caller in? ... Can the caller reach another room
5 from which escape might be easier?"

6 Sorry, I've gone on to 1712. Are you there with me?

7 A. I'm with you.

8 Q. Yes. Then under the heading "7. Giving advice":

9 "The standard advice to persons involved in a fire
10 situation is to get out and stay out. Only when this is
11 not immediately possible will further advice be
12 appropriate."

13 Then 7.1, "Escape":

14 "Initial efforts should concentrate on ascertaining
15 whether the caller is able to escape by their own
16 efforts using their normal exit route or perhaps by
17 alternative routes or techniques which they've not tried
18 or considered. Clearly the best advice will be for the
19 caller to escape from the property immediately where
20 this is possible. If the normal exit route has been
21 found to be blocked, ascertain if alternative exit
22 routes -- for example, secondary staircase, back door,
23 balcony, or windows opening onto roofs of extensions..."

24 Then if we go to page 1714, there's a summary, and
25 we can just look in the right-hand column:

1 "When advice is given, it must be prioritised in the
2 following way: 1. Check if escape is possible. 2.
3 Protect location from fire and smoke. 3. Assist rescue
4 operation."

5 The point is repeated again if you go to 1716, under
6 "Assess":

7 "Escape? Property, location, aid to escape."

8 Then "Give advice":

9 "Get out. Alternative route, eg window/balcony."

10 I won't read any more, Mr Simmons, but it's clear
11 that the primary advice is escape, isn't it?

12 A. I agree with you there.

13 Q. Well, your unflinching belief that trapped persons would
14 be rescued and therefore should stay in place is
15 contrary to that advice. That's the point I'm putting
16 to you.

17 A. I don't fully agree with you, because the guidance and
18 training we were given indicated to try and keep people
19 safe in a safe room if we could get them into a room if
20 they couldn't get out. But the way I interpreted what
21 was happening is that the caller couldn't get out to
22 a place of safety, even --

23 THE CORONER: Mr Simmons, can I just stop you there, because
24 you weren't the operator speaking to Catherine Hickman
25 and all we can do is go through objectively what was on

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(In the absence of the Jury)

Housekeeping

THE CORONER: Thank you, yes. It would be helpful if I can just have some idea of time estimates for Mr Simmons tomorrow morning. Mr Hendy, do you have an idea how much longer you might need?

MR HENDY: I find it a little bit difficult, madam. What I've done this afternoon took a lot longer than I'd anticipated, but I should think about 20 minutes. Certainly no more than half an hour.

THE CORONER: Okay, thank you very much. Mr Dowden?

MR DOWDEN: Than five minutes.

THE CORONER: Ms Al Tai?

MS AL TAI: Dependent on the questions asked before, no more than ten minutes, I would imagine.

THE CORONER: Thank you very much. Others?

MS SANDERSON: I don't think I have anything.

THE CORONER: Thank you. Mr Compton?

MR COMPTON: Madam, I have one possible topic, but it will be very short, two or three minutes.

THE CORONER: All right, thank you. Mr Walsh?

MR WALSH: 15 minutes at the outside, but probably more likely ten.

THE CORONER: All right, thank you very much. Yes, and then continuing? I think we're going to ask Ms Real if she

1 can come for a fairly short session after Mr Simmons; is
2 that right?

3 MR MAXWELL-SCOTT: I think Ms Al Tai would like her to be
4 available to give evidence.

5 THE CORONER: Yes. I think the expectation is that that
6 will be quite a short session, I think?

7 MS AL TAI: If I can assist, madam, it will be very short.
8 A matter of five minutes, I would imagine.

9 THE CORONER: All right. Thank you very much.

10 MR MAXWELL-SCOTT: I will liaise with Ms Al Tai about one or
11 two introductory questions I might ask just to set the
12 scene.

13 THE CORONER: Yes. I'll have a look at that tonight as
14 well. That would be very helpful. Thank you very much.
15 Then we go onto Mr Chidgey?

16 MR MAXWELL-SCOTT: Mr Chidgey, exactly, yes. Then after
17 that we have Mr Hale. There's no statement from him;
18 there doesn't need to be. He'll be giving evidence in
19 the same way that Mr Moore did.

20 THE CORONER: Right.

21 MR MAXWELL-SCOTT: After that, Mr McGurran.

22 THE CORONER: Okay. Does it look realistic to be trying to
23 complete that evidence tomorrow, in addition to
24 Mr Simmons and Ms Real?

25 MR MAXWELL-SCOTT: Probably not, but it may be worth

1 Mr McGurran starting, if he's available. He's the final
2 witness scheduled for the day.

3 MR WALSH: Well, on the basis that if Mr Simmons is about
4 an hour tomorrow and Ms Real is very short, then there's
5 only Mr Hale and Mr McGurran after that.

6 MR MAXWELL-SCOTT: Mr Chidgey.

7 MR WALSH: Oh, Mr Chidgey. We'll have them all here, madam,
8 on the basis that we'll do our best to do it.

9 THE CORONER: Well, that's very kind. We'll see how we go
10 then. All right. Well, thank you very much. Any other
11 points anyone would like to raise? Okay. Right,
12 10 o'clock tomorrow then, thank you.

13 (4.01 pm)

14 (The court adjourned until 10 o'clock the following day)

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DAY 21 OF TRANSCRIPTION OF THE
Lakana1 House Fire
Inquest (CORRECTED) 12/02/13