

Your Ref: [REDACTED]

Our Ref: [REDACTED]

1 March 2021



Coroner's Office
West Sussex Record Office
Orchard Street
Chichester
West Sussex
PO19 1DD

By email only: [REDACTED]

Dear Sir/Madam,

Re: Inquest into the death of Brian James Easey

1. Thank you for your letter of 8 February granting the Council's request for an extension of time to reply to the Regulation 28 Report. We are now in a position to reply to that Report.
2. In summary, we can inform the Coroner that reports produced by Ayerst, an external asbestos specialist, following extensive inspections have confirmed that there is no contamination of the Council's Registrar files that were once held at 340 Brixton Road (and at other offices used by the Council's Registrar's Office in the past). Further details are set out below. In view of these findings the Council does not intend to take any further action.
3. For present purposes the Council asks the Coroner to note that Mr Easey's description of his employment history is disputed, some of the disputed matters are addressed below.
4. When the Record of Inquest ("ROI") was issued on 5 January 2021 there was no evidence of asbestos contamination either at any of the Council's premises or of any Council records. This differed from the situation at the Mill Road premises owned by West Sussex County Council where asbestos contamination was confirmed to exist in 1985 (see pages 32-34 of the bundle

previously provided to us by the Coroner's office). In the circumstances, there was no basis for the ROI to refer to Lambeth Council at paragraph 3.

5. Given that the requisite evidence did not exist when the ROI was completed, and that the Council was not notified of the inquest or given an opportunity to participate or make any representations to it, and given the findings of the Ayerst reports, the Coroner is invited to amend (or revoke and re-issue) the ROI to remove any reference to asbestos exposure during Mr Easey's employment with Lambeth Council. **The Council asks for a response to this request within the next seven days.**
6. The remaining paragraphs of this letter contain a more detailed response to the issues raised.

Ownership of the properties in which the Registrar's Office was situated

7. The Council has not owned 340 Brixton Road since at least 1982.
8. Land Registry records prior to 1982 are unavailable, however, the records show that 340 Brixton Road was owned by St Thomas' Hospital Nominees from 1982 and that the property has been owned by Lexadon (Brixton Road) Limited since 11 February 2019, there were other owners in the intervening period.
9. The Council understands that extensive works were carried out to 340 Brixton Road (including to the basement where the strong room is said to have been situated) in or around 2011 when the building was converted into flats. There is limited information relating to inspections by the Council's Building Control department which support this timeframe. There is no suggestion from the available records that any specialist works were required due to the presence of asbestos.
10. The Council sold 357-361 Brixton Road in 2004. The Land Registry records show that the property is currently owned by Lexadon Limited. Hambrook House was demolished in 2017.

Mr Easey's place of work

11. Mr Easey's witness statement (§7) states that he was employed by the Council between 1965 to 1984. He states that he was employed as a Registrar and

later a Deputy Superintendent and that “*for the duration of his employment*” he was based at 340 Brixton Road (“340”).

12. It is accepted that Mr Easey was employed by the Council from 1 April 1965 until 31 October 1984 and that he worked for the Registrar’s office but it has not been possible to verify his job title/description.
13. Mr Easey cannot have been based at 340 for the *whole* period 1965 – 1984 because the building was not owned by the Council for the whole period. Further, the location of the Registrar’s Office moved before the building was sold. Fuller details on these matters are set out below.

Location of Registrar’s Service and records

14. As advised in our letter of 8 February 2021, 340 Brixton Road was the *main* Registrar’s office but there were several satellite offices. For example, in 1967/68 it appears that Mr Easey was Registrar for the Lambeth North Sub-District and was based at 123 Kennington Road. Between 1971/72 and 1978/79 it appears 340 Brixton Road was used by the Registrar as a marriage office (only), births and deaths were registered at another building in Lambeth called Hambrook House and for at least some of those years Mr Easey appears to have been one of the Registrars of births and deaths (only). In 1979/80 the Registrar’s service moved to 357-363 Brixton Road which was used for births, deaths *and* marriages from this point until 2004 when it moved to Lambeth Town Hall. The Registrar’s Office remains at the Town Hall but some of the records have been relocated off-site.
15. The Registrar’s records date back to circa 1837 and there are approximately 8000 registers in total. The records for the period 1837 – circa 1960 and some records for subsequent years are kept in two secure air/temperature-controlled vaults at external sites in Essex (Rainham and Barking) managed by a company called Restore. The records held in Essex can be accessed by the Council’s employees on request. The remaining records up to the present day are kept in a secure vault at the Lambeth Town Hall. Accordingly, there are three locations at which records are currently stored.

16. The Council had commissioned detailed reports from external asbestos specialists in relation to the records held at each of these three locations, some of which will have been stored at 340 and/or 357-363 Brixton Road at some point in the past. The results of those tests are set out below under the heading “outcome of testing”.

Outcome of testing by Ayerst

17. Ayerst has advised that because the building(s) in which Mr Easey worked are not available for inspection, the files that may have been kept in the buildings are the only remaining physical items that can be inspected in order to ascertain whether there is any future threat to life from anyone accessing the files in question. This accords with the observations made by the Coroner in her Regulation 28 Report as to the potential risk presented by asbestos dust present on records.
18. Out of an abundance of caution, the Council has commissioned detailed inspections by Ayerst of the files kept at each of the three sites. Ayerst advised that it would be reasonable to inspect a representative sample of the files (10% - 800 files) to check for the presence of asbestos. The inspections included examining any packaging or storage receptacle the files came in. The outcome of these inspections which included both lab testing of debris found with the files and air sampling are as follows:
 - a. Files from Lambeth Town Hall, 1 Brixton Hill, Brixton, SW2 1RW were inspected on 1-2 February 2021: no asbestos detected
 - b. Files from Restore, 44 River Road, Barking, IG11 0DW were inspected during the week commencing 8 February 2021: no asbestos detected
 - c. Files from Restore, Unit 15 Easter Park, Ferry Lane, Rainham, RM13 9BP were inspected during the week commencing 8 February 2021 (the selected files were brought to the Barking Restore site for inspection): no asbestos detected
 - d. Air tests done at Lambeth Town Hall (on 11 January 2021) and both of the Restore sites (on 26 and 27 January 2021) raised no concerns of airborne asbestos fibres (airborne fibre concentration of less than 0.01 f/ml).
 - e. Air tests done daily during the above inspections raised no concerns of airborne asbestos fibres (airborne fibre concentration of less than 0.01 f/ml).

19. Copies of the reports are enclosed with this letter. We recommend the Coroner consider the document "Archive Records Investigation" first as this explains the nature or the extensive inspection conducted by Ayerst. There are four inspection reports in total as there were two specialists involved in the inspections of the Town Hall and Restore files and they prepared two reports each. There is a total of ten air test reports.
20. The Council is satisfied that its records are not contaminated with asbestos fibres and that there is no risk to those that come into contact with these files.
21. As previously advised, the Council has no records of any concerns of suspicions about asbestos contamination being raised by former or existing staff or anyone who may have handled the files from the Registrar's Office. In the circumstances no further action is proposed.
22. We look forward to hearing from you in relation to the points raised at paragraph 5 of this letter within the next seven days.

Yours sincerely,




Enc.