

# *R Metcalf Ltd Solicitors*

*Design Works  
William Street  
Felling  
Tyne and Wear  
NE10 0JP*

[REDACTED]  
[REDACTED]  
HM Coroner  
The Black Country Coroner's Court  
Jack Judge House  
Halesowen Street  
Oldbury  
B69 2AJ

[REDACTED]  
Your Ref:

Date: 19<sup>th</sup> August 2021

[REDACTED]  
Dear Sirs

**Re: INQUEST INTO THE DEATH OF ADAM BRUNSKILL  
PREVENTING FUTURE DEATHS REPORT**

We write further to the inquest into the death of Adam Brunskill and following receipt of the 'Preventing Future Deaths' Report.

On behalf of Wayne Clarey, we wish to state that he believes there has been a fundamental misunderstanding of his evidence given on the last day of the inquest. So that there can be no misunderstanding, we can confirm that [REDACTED] knew Adam Brunskill quite well because of the rugby coaching that Mr Clarey carries out for his home club. He was approached by Adam's mother who said that he could not find a job anywhere and would [REDACTED] as a favour, take him on and train him in roofing. After Adam's first day at work, he rang his mother and sister and said he was really enjoying working with the men in the job as a labourer.

When questioned about future trainees [REDACTED] stated that he would never put himself in the position of having a new trainee as he could not, in all conscience, take on anyone again because of the accidental death of Adam. Therefore we restrict ourselves to the hypothetical situation of a new trainee unskilled being placed on an induction course under supervision. [REDACTED] would insist that any trainee would have to have the mandatory card and undertake the health and safety course. Also, as 99.9% of his work is with Pro-Clad, he would ensure that he would make himself available to use their training and also set out a full training schedule with checks by both himself and Pro-Clad. In relation to new workers with experience, again he would make sure that he adopted the Pro-Clad training structure. This in essence is already being undertaken by [REDACTED] and his second-in-command [REDACTED] as both of them have obtained extra skills which entail an outside body attending and watching them at their work and assessing their skills. This is a clearly defined set of proposals by [REDACTED] for a situation that will never happen for a trainee without experience. It is part and parcel of the way that he works and his company works very closely with Pro-clad.

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The relationship between Pro-clad and Wayne Clarey Roofing has strengthened since the tragic situation which means that any future jobs will have a much higher standard of safety measures in place with more rigorous supervision by both Pro-clad and [REDACTED] himself.

We hope that what has been written will be accepted as a genuine attempt to answer the concerns of the Coroner. It should also be stated that [REDACTED] and his staff have fully cooperated with the HSE from the beginning of this incident right up to the inquest and they will continue to offer any assistance necessary to the HSE to safeguard lives. The impact on the family has obviously been immense but it has also been a tragedy for [REDACTED]

Yours faithfully

[REDACTED]

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[REDACTED]

Your Ref:

Date: 4<sup>th</sup> October 2021

[REDACTED]

Dear Sirs

Re: REGULATION 28 : REPORT TO PREVENT FUTURE DEATHS

Further to your email of 3<sup>rd</sup> October, we wish to confirm the following:

1. Since the inquest, Wayne Clarey Roofing has been using a clear designated structured training programme for new and /or unqualified employees. It is the Pro-Clad training structure. It was stated at the inquest by [REDACTED] that [REDACTED] is an employee of Pro-Clad as 99% of his work is carried out for Pro-Clad.
2. The 2 supervisors are [REDACTED] and [REDACTED]. This was confirmed in the inquest by both men.
3. [REDACTED] appraises the workers on a daily basis and recommends them for further qualification which is tested by outside agencies whilst they are at work.

For completeness, the above was put into place immediately following the inquest and we would therefore be grateful if you could confirm that our obligation to respond to the Regulation 28 Notice has now been complied with. Would you also confirm if the HSE have responded to the Notice.

Yours faithfully

[REDACTED]

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