

EXHIBIT CT3

RESPONSES TO SPECIFIC QUESTIONS LISTED IN THE INQUIRY'S LETTER TO CALLUM TULLEY OF 30 SEPTEMBER 2021

1. *In KENCOV1007 V2017042500021, at 00:00:07, please identify the name of the staff member (identified as Staffer 1) who said to you "apparently he tried to [inaudible] a t-shirt round his neck"?*

I do not know the name of this member of staff.

2. *In KENCOV1007 V2017042500021, at 00:01:06, please identify the name of the staff member (identified as Staffer 2) who asked, "is he banging something?"*

This member of staff is not in the shot when this is said. I do not know which member of staff this voice belongs to.

3. *In KENCOV1007 V2017042500021, at 00:02:52, please identify the name of the staff member (identified as Staffer 3) who asked, "is he just still banging it?"*

Again, this comment is made by someone who is not in the shot at the time it was said and I am not able to identify who made the comment.

4. *In KENCOV1007 V2017042500021, at 00:08:45, please identify the name of the staff member (identified as Staffer 4) who said "No, no, no. It's here."*

Clayton Fraser

5. *In KENCOV1007 V2017042500021, at 00:08:48, please identify the name of the staff member (identified as Staffer 5) who said, "It's here."*

Clayton Fraser

6. *In KENCOV1012 V2017050400021, at 00:20:22, please identify the name of the staff member (identified as Staffer 2) who shouts, "don't you even start, don't you dare"?*

This member of staff is not in the shot when this is said and I am not able to identify who this is.

7. *In KENCOV1012 V2017050400021, at 00:20:39, please identify the name of the staff member (identified as Staffer 3) directly opposite you on the landing overlooking the netting who is moving his arms and says something inaudible.*

I believe this officer was fairly new to the centre and I did not know his name.

8. *In KENCOV1012 V2017050400021, at 00:20:58, please identify the name of the staff member (shown as Unknown) who asks, "are we locking up?"*

This member of staff is not in the shot when this is said and I am not able to identify who this is.

9. In KENCOV1012 V2017050400021, at 00:21:34, you ask a staff member (identified as Staffer 5) whether the wing is getting locked up and they said no. Please identify the name of this staff member.

This member of staff is not in the shot when this is said and I am not able to identify who this is.

10. In KENCOV1012 V2017050400021, from 00:21:36-00:22:00, please identify as many staff, both speaking and not speaking, as you can, and if you can, please identify what they say and the number they are given in the subtitles (e.g., "Staffer 6, Staffer 9").
- Between 00:21:36 and 00:21:41, you can see two members of staff walking left to right along the balcony – then the officer in navy turns and walks out of shot to the left. This is DCO Clayton Fraser. The other officer in a white shirt who continues to walk to the right to the centre of the building and then holds onto the rail and looks out over the netting is DCM Shane Farrell.
 - At 00:21:52:00, an officer with a beard and glasses briefly appears at the left hand side of the frame. I believe this officer went by the name of GG, though I do not know his real name. I believe he was usually posted at Tinsley House (G4Ss other Gatwick IRC).
 - At 00:21:56:00, a DCM wearing white shirt comes into shot. The sub-titles identify him as 'Staffer 6' and he says 'GG, here'. His name is Ben though I do not know his second name.
 - At 00:22:00, the subtitles say that Staffer 9 says 'Lock up'. I do not know the name of 'Staffer 9'.
 - At 00:22:01 the subtitles say that Staffer 6 (DCM Ben) says 'lock up yeah, lock up'. This is inaccurate. I believe this was said by GG.

11. In KENCOV1012 V2017050400021, at 00:24:29, please give (if you can) the officer "Sunil's" surname.

I do not know Sunil's second name.

12. In KENCOV1012 V2017050400022, at 00:03:39 and following, please identify the names of the individuals who appear to be staff members who say the following: (shown as Unknown) "Please man [inaudible]", (shown as Unknown) "Let's get him banged up" and (identified as Staffer 1) "You two [inaudible]".
- I believe the 'Unknown' person who said 'please man' was a detainee. I do not know his name.
 - The voice of the person who says 'Let's get him banged up' sounds like Ryan Bromley, but I cannot be sure it was him who said this. My attention at the time was on D1527.
 - The person identified in the subtitles as Staffer 1 who says "You two,[inaudible]" is DCM Steve Dix. He actually says "You two, bang up [inaudible]. He is talking to Sunil and I.
13. In KENCOV1012 V2017050400022, at 00:05:33, please identify the name of the staff member (identified as Staffer 2) who says, "we're not letting people in [inaudible]."
- This was a new member of staff whose name I do not know. You can make out a small part of his face if you freeze the frame at the aforementioned time code and look at the bottom left of the frame.

14. In KENCOV1012 V2017050400022 clip 2, at 00:19:59, please identify the name of the staff member who said (identified as Staffer 4) "Stuart's taking [inaudible]"
- I do not know the name of this officer. I think they are talking about Stuart Povey-Meier.
15. In KENCOV1012 V2017050400022 clip 2, at 00:20:50 and following, there is a gathering of officers and managers. Two of the individuals present are Clayton Fraser and Steve Dix. Please identify the others' names, including which officer in the video corresponds to which name, and by reference to their location in the footage and the relevant timestamp.
- At 00:20:40, on the right hand side of the screen is the DCM named Ben, who I refer to in my answer to question 10. He was present for the conversation, though he does not always appear in the footage.
 - At 00:20:56, Clayton Fraser is standing to the left out of the shot. There are four people in shot. On the left of screen is an officer called Mark. I do not know his second name. Looking at the screen, to the right of Mark is a Tinsley House DCM whose name I do not know. Further to the right is another DCO whose name I do not know, but he is the same member of staff referred to in question 7. To the far right of the screen there is DCM in a white shirt with his back towards the camera, who is Ben.
16. In KENCOV1012 V2017050400022 clip 2, at 00:24:06, please identify the name of the staff member (identified as Staffer 15) who asks if D1527 is okay?
- I do not know the name of this member of staff. I believe she may be a nurse.
17. In KENCOV1012 V2017050400022 clip 2, at 00:24:17, please identify the name of the staff member (identified as Staffer 16) who says, "[inaudible] not happy"?
- I do not know the name of this member of staff. In fact, I do not even recognise him. He may have been one of the new DCOs, or perhaps he was a DCO from Tinsley House IRC.
18. In KENCOV1016 V2017051300011, please identify which staff member is which in the footage (by reference to Officer 1, Officer 2 etc, and Nurse 1, as well as their images in the video).

Please note, that in the table below I refer to a member of the Senior Management Team as Dan Haughton. My recollection was that Dan's surname was Laughton or Lawton. The Inquiry has, however, identified the officer as Dan Haughton and, as I did not normally use officer's surnames, I am happy to accept the Inquiry is likely correct.

Timecode	Sub-title reference	Staff Member
00:02:30		Chris Donnelly is the officer in the white shirt with his back to the camera. The officer in navy to the right of the picture is Johnny Martin
00:02:38	Officer 4	Chris Donnelly
00:02:42 00:02:46	Officer 1 Officer 2	Callum Tulley
00:02:52 – 00:02:55	Officer 4	Chris Donnelly
00:03:04	Officer 3	Chris Donnelly
00:03:30 – 00:03:57	Officer 5	Not Known

00:03:59 – 00:04:34	Officer 4	Chris Donnelly
00:05:18 – 00:09:35	Officer 3	Not known
00:09:37 – 00:09:39	Officer 4	Johnny Martin
00:10:16 – 00:11:42	Officer 3	Not known
00:11:20	Officer 1	Not known
00:11:29 – 00:12:05	Officer 5	Dan Haughton
00:12:10 – 00:12:20	Officer 3	Shane Farrell
00:12:45 – 00:12:55	Officer 3	Not Known
00:13:03 – 00:13:15	Officer 3	Shane Farrell
00:13:15 – 00:14:08	Officer 5	Dan Haughton (Please note that at 13:24, Dan Haughton comes into shot)
00:15:01	Officer 3	Not known
00:15:12	Officer 4	Chris Donnelly
00:15:43 – 00:16:09	Officer 3	Callum Tulley
00:16:31	Officer 5	Johnny Martin
00:16:46	Officer 5	Not known
00:16:54	Officer 5	Dan Haughton
00:16:58	Officer 3	Not known
00:17:35	Officer 4	Not known
00:17:37	Officer 6	Dan Haughton
From 00:17:48		Chris Donnelly is the officer standing behind Adam, who is sitting in a chair
00:18:30 and 00:19:58 – 00:20:00	Nurse 1	Not known
00:18:59 to the end of the clip	Officer 7	This is a Tascor officer, whose name I do not know

19. In KENCOV1016 V2017051300012, please identify the two officers in this footage.

The officers shown in this clip work for the escorting company Tascor. They are not Brook House staff. I do not know their names.

20. In KENCOV1019 V2017051700009, please identify the names of Staffers 1-4 and Detainee 1 if you are able.

- The 'unknown' voice at the very start of the clip is DCM James Begg.
- I do not know the name of Detainee 1.
- The person noted as 'Staffer 1' at 00:03:57 who says 'What's up' is a detainee, not a member of staff.
- There is a mistake on the subtitles at 00:04:25. The radio is calling out for DCM 'Jack Bannister', not 'Jan Banister'.
- Staffer 2 at 00:05:20 is James Begg.
- I do not know the names of staffer 3 and staffer 4.

21. Please identify all the staff members who were in the stairwell in KENCOV1019 V2017051700018. Please state which staff member is which in the footage (by reference to Officer 1, Officer 2, Staffer 1 etc, as well as their images in the video, and by reference to their location in the footage and the relevant timestamp).

- Officer 1 – please see the table below
- Officer 2 – please see the table below
- Staffer 1 – I do not know the name of Staffer 1
- Staffer 2 – please see the table below
- The DCM identified in the sub-titles as Steve Dix is not Steve Dix. He is another DCM whose name I do not know.

In addition to John Connolly, myself and Staffer 1 and the DCM, the other staff seen in the clip are:

- Pat (whose surname I do not know) – seen briefly in shot at 00:04:40 but who spends much of the conversation standing in the archway at the top of the stairs.
- Dan Small – who spends most of the conversation sat on the stairs to the right hand side of the scene

Timecode	Sub-title reference	Staff Member
00:00:21 – 00:00:40	Officer 1	Pat, whose surname I do not know
00:00:53 – 00:01:15	Unnamed officer	Pat, as above
00:01:24	Officer 1	Not Known
00:01:44	Officer 1	Pat, as above
00:02:27, 00:02:43, 00:03:12	Officer 2	John Connolly
00:03:21	John Connolly	This is incorrect – the speaker is Dan Small
00:03:33	Officer 1	Pat, as above
00:03:40	Stu	This is incorrect. The speaker is Pat
00:03:41	John Connolly	Error in transcript. I believe JC is saying 'Yous two' (i.e. you two, speaking to me and Dan Small)
00:05:04	Officer 1	Pat, as above
00:05:20	Staffer 1	This is incorrect. I believe this is John Connolly saying 'That's fine'
00:05:44 – 00:05:46	Staffer 2	Dan Small
00:06:26	Officer 2	Not Known
00:07:11	Officer 1	John Connolly
00:07:54 – 00:08:04	John Connolly	Please note that the subtitled should be 'Mandib' rather than 'Mandid'.
00:08:14	Officer 2	Pat
00:09:04 00:09:31	Officer 2	This is the officer identified as Staffer 1 throughout this clip
00:10:11 – 00:10:15	Officer 2	Not known
00:10:53	Officer 2	Pat, as above
00:11:22, 00:11:54	Officer 1	Pat, as above
00:15:00	Officer 2	Pat, as above

00:16:36	Officer 2	Dan Small
00:20:59 – 00:21:05	Officer 1	Pat, as above
00:21:52 – 00:21:59	Officer 1	Not known
00:22:58	Not identified	Pat, as above
00:24:09	Not identified	Dan Small
00:56:56	Unknown	John Connolly

22. *At KENCOV1019 V2017051700019, please identify the G4S staff member at 00:14:39.*

This is DCM Jack Bannister in DCO uniform.

23. *In KENCOV1025 V2017052700008, please identify the officer (identified as Officer 1) who said at 00:00:20 “you hold it like that” and the officer (identified as Officer 2) who said at 00:00:22 “and don’t stop”.*

Officer 1 and Officer 2 are both restraint trainer Dave Webb.

24. *In KENCOV1025 V2017052700009, please identify the officers in the room by reference to their location in the room and/or what, if anything, they say.*

- At the beginning of KENCOV1025, V201052700008-9, in the section from File 8, you can see Dave Webb sitting on the couch to the right towards the back of the room. Yan Paschali is also on the right, but on the couch nearest to me. They remained in the room during File 9.
- At File 9 00:00:00:00 – the officer seen demonstrating the shield and identified at 00:00:20:00 as Officer 3 is DCO Johnny Martin
- At 00:00:39:13 the subtitles for Alex are incorrect. Alex says here ‘Yeah. You literally smash the cunt’. Alex is the DCO shown at 00:01:14:22 lying on his back on the sofa.
- The DCO identified as ‘Officer 5’ at 00:01:22:08 is DCO Johnny Martin.
- I do not know who ‘Staffer 1’ is.

25. *In KENCOV1025 V2017052700010 at 00:01:13, please identify the staff member (identified as Staffer 1) who says, “don’t really stop till you take him”.*

I do not know who Staffer 1 is.

26. *In KENCOV1025 V2017052700010 at 00:01:19, please identify the staff member (identified as Staffer 2) who says, “Just literally kick him out”.*

DCO Alex.

At 00:01:23 the subtitle is incorrect. Yan Paschali actually says "Obviously, if he complies, don't fucking beat the shit out of him".

27. *In KENCOV1025 V2017052700020, please identify every staff member (including nursing staff) in the footage (by reference to Officer 1, Officer 2, Nurse 1 etc, as well as their images in the video, and by reference to their location in the footage and the relevant timestamp).*

- Officer 1 is Steve Dix
- Officer 2 is generally Dave Webb, otherwise see the table below
- Officer 3 is Dan Lake

- Nurses – I do not know the names of nursing staff

Timecode	Sub-title reference	Staff Member
00:05:54:00	N/A	DCM Steve Dix opens the cell door
00:06:10:00	Officer 2	Steve Dix
00:06:11:00	Unknown	Yan Paschali
00:06:29:00	Unknown	Yan Paschali
00:06:30:00 onwards		In this section, the officer in the helmet on the right is Yan Paschali. The officer in the helmet on the left is Dave Webb
00:06:38:00	Unknown	Dave Webb
00:08:20:00		The DCM with the camera is Nathan Ring
00:11:33:00	Callum Tulley	The sub-titles say 'Callum Tulley – Get him up, get him up'. This is not my voice. This is Dave Webb's voice.
00:17:35:00 onwards		As D1914 walks out of the cell, Dave Webb is the officer on the left in the helmet, controlling D1914's right arm. Yan Paschali is the officer in the helmet on the right, controlling D1914's left arm.
00:18:23:00	Officer 2	The officer who says 'Keep Going' is Steve Dix
00:20:56:00		Ryan Bromley arrives and relieves Yan Paschali He is the man in the helmet on the right of screen.
00:20:59:00		DCM Steve Loughton appears behind D1914, and appears to be placing a pink metal sheets over the glass viewing windows of the cells door
00:21:05:00		An officer, whose name I do not know, arrives and relieves Dave Webb. He is the man in the helmet to the left of D1914.
00:22:29:00		As I leave the room, the officer in the white shirt whose face you can see at the bottom right of the screen is Shane Farrell. The officer in the white shirt just outside the room with his back to camera is DCM Steve Loughton.
00:22:48:00		I am unable to identify all the officers present outside the cell, but at 22:48, at the bottom right of the screen, DCM Nathan Ring is also present.

28. In KENCOV1035 V2017061400015 at 00:00:16, what is "Mark's" surname?

I do not know Mark's second name.

29. *In KENCOV1035 V2017061400015, please identify the staff members (including nursing staff) who are in the yard with or attending to D1275, and by reference to their location in the footage and the relevant timestamp.*

- I believe the member of staff shown at 00:00:26 assisting the detainee and putting on gloves is called Mark.
- I do not know his second name.
- I believe the bald member of staff shown briefly at 00:00:52 is called Nick London.
- 00:01:20 shows that DCM Steve Dix and DCM Steve Loughton have also arrived. Dix is on the left, Loughton is on the right and DCM Nick London is stood between them.
- A nurse arrives at 00:03:13. Only part of her body comes into shot. I do not know her name.
- I am not able to identify any of the other members of staff in the courtyard.

30. *In KENCOV1035 V2017061400015, please identify the staff members who are in the room with D1275 from 00:16:21 until the end of the clip, and by reference to their location in the footage and the relevant timestamp.*

- I do not know the names of the nurses in the room.
- In this clip, various members of staff were in the room, including Nathan Ring, a male officer wearing glasses whose name I do not know and Hayley. I am unable to say exactly when each officer came into or left the room.
- At 00:17:40 when the nurse and I are talking about if a detainee will die soon, there was no one else in the room at this point, besides the detainee.
At 00:21:33, the sub-titles read 'Callum Tulley – Getting a lot of this, ain't we'. This is incorrect as it is not my voice. I do not know whose voice this is.
- At 00:25:28:11 I do know the name of the male officer who says 'Is that Taylor Swift?' . I believe that DCM Hayley entered the cell at around this point.
- At 00:26:39:20 the 'Unknown' member of staff who says 'Alright? X factor next year, yeah?' is DCM Hayley. She is stood to my right when this is said. I believe that DCM Nathan Ring re-entered the cell at around this point.
- At 00:26:52:00, an officer wearing glasses who has been sat to my left gets up, goes to D1275 and then returns to his seat. I do not know the name of this officer.
- At 00:27:21:21 DCM Hayley is the unknown member of staff talking about orange juice.
- Nathan Ring is the 'Unknown' member of staff talking at 00:28:28:15, at 00:28:34:24, and at 00:28:37:13. He is shown later in the clip at 00:29:04:22
- DCM Hayley is shown at 00:28:57:14

31. *In KENCOV1035 V2017061400016 at 00:00:20, what is "Hayley's" surname?*

I do not know Hayley's second name.

32. *In KENCOV1035 V2017061400016, please identify the staff members (including nursing staff) who are in the room with D1275, and by reference to their location in the footage and the relevant timestamp?*

- I do not know the name of the nurse present.
- At the very start of this clip DCM Nathan Ring and DCM Hayley are both in shot at 00:00:00:20.
- There is a mistake in the subtitles at 00:01:19. Nathan Ring does not say '[inaudible] he looks alright'. It is the DCO officer in glasses, whose name I do not remember, who says this.
- At 00:03:16, a big, bald DCM appears. His name is Nick London.
- I do not know the names of the other members of staff shown in this clip.