

<p>1 Tuesday, 30 November 2021</p> <p>2 (10.00 am)</p> <p>3 MR CALLUM TULLEY (continued)</p> <p>4 Examination by MR ALTMAN (continued)</p> <p>5 MR ALTMAN: Chair, thank you.</p> <p>6 Mr Tulley, do you have your statement still open?</p> <p>7 A. Yes.</p> <p>8 Q. In paragraph 73, which is on page 17, you talk about the</p> <p>9 culture of abuse at Brook House. Do you remember you</p> <p>10 told us yesterday that it was among a significant</p> <p>11 minority of officers, and I think you said managers, but</p> <p>12 if you didn't, you certainly say that in your witness</p> <p>13 statement?</p> <p>14 A. Yes, sir.</p> <p>15 Q. You say:</p> <p>16 "The majority of DCOs weren't abusive. Many of them</p> <p>17 were hardworking, decent people, trying to do their best</p> <p>18 in a bleak, poorly staffed, highly charged and toxic</p> <p>19 environment. However, officers who were deemed too</p> <p>20 empathetic, helpful or kind to detainees were often</p> <p>21 marginalised, criticised or mocked ..."</p> <p>22 You told us about that yesterday. But then you say</p> <p>23 this:</p> <p>24 "... for example, I understood a female DCO was</p> <p>25 bullied and intimidated after she raised concerns to</p> <p style="text-align: center;">Page 1</p>	<p>1 a video diary, when we come to the filming that you did</p> <p>2 and the processes you underwent, was something you would</p> <p>3 do at the end of a shift where you'd been filming, and</p> <p>4 you'd go off with the producers and you would really</p> <p>5 just be debriefed about what had happened on that day,</p> <p>6 or perhaps further thoughts about things which had</p> <p>7 happened perhaps a day or two before?</p> <p>8 A. Yes, sir.</p> <p>9 Q. Principally, this would be you debriefing, or having</p> <p>10 a debrief with the producers about what had gone on and</p> <p>11 explaining what you had filmed and other notable events?</p> <p>12 A. Yes, sir.</p> <p>13 Q. On this particular day, the male speaker, presumably</p> <p>14 somebody from the BBC, asked you:</p> <p>15 "So why did you come to the BBC?"</p> <p>16 And you say:</p> <p>17 "On my initial training course, I became quite close</p> <p>18 with this lady, and we both started at the same time,</p> <p>19 both new officers, and she realised soon after starting</p> <p>20 that there were some serious, serious problems. She</p> <p>21 complained, she took a stand, and as a result she was</p> <p>22 marginalised, she was called a grass, she was pushed</p> <p>23 out, she was bullied, and she ended up leaving shortly</p> <p>24 afterwards. I knew that if I did the same as her, then</p> <p>25 the exact same thing was going to happen to me. So</p> <p style="text-align: center;">Page 3</p>
<p>1 a senior manager."</p> <p>2 That was, what, a colleague of yours?</p> <p>3 A. Yes, sir.</p> <p>4 Q. A DCO?</p> <p>5 A. Yes, sir.</p> <p>6 Q. What period was that? When are you referring to?</p> <p>7 A. This is when I was -- I was in correspondence with the</p> <p>8 BBC at this point, but I wasn't secretly filming for</p> <p>9 them.</p> <p>10 Q. So that was sometime after, as we will come</p> <p>11 to, January 2016 --</p> <p>12 A. Yes.</p> <p>13 Q. -- and before 24 April 2017?</p> <p>14 A. Yes.</p> <p>15 Q. Somewhere in that period?</p> <p>16 A. Before March 2017.</p> <p>17 Q. I'd like you to look at a video diary that you made well</p> <p>18 afterwards, on 9 June, I think it was, 2017. We will</p> <p>19 put up on screen, please, if we can, <TRN0000065>.</p> <p>20 Chair, for you, it should be your section B/99 --</p> <p>21 THE CHAIR: Thank you.</p> <p>22 MR ALTMAN: -- at page 5. If I have got it right, this is</p> <p>23 a video diary you made on 9 June 2017. Do you see there</p> <p>24 was a question, and perhaps this is a time -- we will</p> <p>25 come back to one or two of these a little later. But</p> <p style="text-align: center;">Page 2</p>	<p>1 I looked at different means by blowing the whistle, and</p> <p>2 contacted the BBC."</p> <p>3 You will remember yesterday one of the questions</p> <p>4 I asked you is why you didn't leave after that first</p> <p>5 year, and why, going back a little in time, you became</p> <p>6 a DCO, and so on and so forth. Part of that, from what</p> <p>7 you have told us yesterday, is encapsulated in that</p> <p>8 passage. But the reason I'm directing your attention to</p> <p>9 this passage in particular is to ask you whether the</p> <p>10 woman that you mention there, the one who was</p> <p>11 marginalised and called a grass because she complained</p> <p>12 and took a stand, is the same woman that you mention in</p> <p>13 paragraph 73 of your inquiry witness statement?</p> <p>14 A. Yes, sir.</p> <p>15 Q. It is. Tell us, then, a little just about the</p> <p>16 complaints that she made, from what you knew and</p> <p>17 understood about it, to whom she went and what happened</p> <p>18 to her?</p> <p>19 A. Well, I think the first thing I should say is that you</p> <p>20 will see here that I'm talking about, soon after we</p> <p>21 started, she had serious concerns about the -- about</p> <p>22 Brook House, because we became quite close on the</p> <p>23 initial training course --</p> <p>24 Q. So we are talking about DCO, not ACO?</p> <p>25 A. I think this is when I was actually training to be an</p> <p style="text-align: center;">Page 4</p>

<p>1 ACO but I was on the first two weeks of her six-week</p> <p>2 training course to become a DCO.</p> <p>3 Q. Pause there. Does that mean, when you were training to</p> <p>4 become an ACO, you would be mixed with people who'd</p> <p>5 applied to become DCOs as part of the training as well?</p> <p>6 A. Yes, my first -- your two weeks of training to be an ACO</p> <p>7 would be the first two weeks of the six-week course for</p> <p>8 the DCOs. So we became quite close on this course. We</p> <p>9 sat next to each other most days. When she was a DCO,</p> <p>10 she would talk to me about her concerns for the welfare</p> <p>11 of detainees and her concerns about staff, but it was</p> <p>12 much later that she raised concerns -- I was in touch</p> <p>13 with the BBC at this point.</p> <p>14 Q. Just pause there, please. Fix the month for us, the</p> <p>15 month and year?</p> <p>16 A. Well, it was in 2016. I made a diary entry, I believe,</p> <p>17 of this. I can't remember the exact date.</p> <p>18 Q. Well, we have a number of your diaries. We certainly</p> <p>19 have diaries between -- we are looking at 2016, aren't</p> <p>20 we?</p> <p>21 A. Yes.</p> <p>22 Q. So we have got diaries of yours -- do you mean your</p> <p>23 noted diaries, your contemporaneous diaries?</p> <p>24 A. It could be 2016, it could be early 2017. Any time</p> <p>25 between the point at which I blew the whistle to the BBC</p> <p style="text-align: center;">Page 5</p>	<p>1 I described yesterday -- buzzing people through doors,</p> <p>2 unlocking --</p> <p>3 Q. But who made that decision?</p> <p>4 A. I don't know who made the decision. I wasn't privy to</p> <p>5 the -- to those kind of details. But I saw -- you know,</p> <p>6 here I saw an officer who complained about wrongdoing</p> <p>7 which directly affected detainees and, rather than the</p> <p>8 manager in question facing disciplinary action, she was</p> <p>9 punished, she was taken away from her duties, and she</p> <p>10 was marginalised and pushed aside and people called her</p> <p>11 a grass behind her back. I was never prepared to have</p> <p>12 that happen to me. So I was never going to follow in</p> <p>13 her footsteps in terms of complaining internally.</p> <p>14 Q. Now, this was the same man, the manager, that you spoke</p> <p>15 about yesterday, do you remember?</p> <p>16 A. Yes, DCM Panel.</p> <p>17 Q. The one who called detainees cunts?</p> <p>18 A. And ordered the use of force on the detainee --</p> <p>19 Q. Yes, on the American man.</p> <p>20 A. -- unnecessarily, yes.</p> <p>21 Q. We know, because it's been confirmed overnight, his</p> <p>22 surname is Purnell -- it's not your fault. You knew him</p> <p>23 as Panel, it's P-U-R-N-E-L-L. Did you know that</p> <p>24 in April 2018, so after the Panorama programme, and long</p> <p>25 after you had gone, almost, but not quite, a year</p> <p style="text-align: center;">Page 7</p>
<p>1 and the time that I actually became employed by them,</p> <p>2 which was a period of about 14 months.</p> <p>3 Q. Perhaps we can look -- as I say, we have several of</p> <p>4 them --</p> <p>5 A. Yes.</p> <p>6 Q. -- some in 2016 and the larger proportion of them for</p> <p>7 2017. But carry on and we will see if we can find</p> <p>8 a note or somebody can find that note?</p> <p>9 A. She complained that DCM Graham Panel was stealing cash</p> <p>10 that had been sent in to detainees. She said she had</p> <p>11 first-hand knowledge of this. She said that she raised</p> <p>12 her concerns to management. She was taken off DCO</p> <p>13 duties and placed onto the menial tasks that an ACO was</p> <p>14 placed upon. Her concerns weren't taken seriously.</p> <p>15 There appeared to me, and to her, to be no repercussions</p> <p>16 for Panel, who she believed was stealing money from</p> <p>17 detainees, cash that was sent in to them by loved ones,</p> <p>18 for them to either use in the detainee shop or to take</p> <p>19 upon discharge from the centre as cash.</p> <p>20 Q. So what happened to her as a result of her complaint?</p> <p>21 In other words, how was she treated?</p> <p>22 A. Well, she was -- as I say, she was taken away from her</p> <p>23 role as a DCO. She was --</p> <p>24 Q. When you say "taken away from her role as a DCO"?</p> <p>25 A. She was given ACO jobs, the menial tasks that</p> <p style="text-align: center;">Page 6</p>	<p>1 afterwards, he was dismissed for gross misconduct</p> <p>2 because of his inappropriate conduct towards colleagues?</p> <p>3 So nothing to do with stealing, but all to do with</p> <p>4 inappropriate, suggestive comments and behaviour towards</p> <p>5 female members of staff. Did you know any of that? Did</p> <p>6 you see any of that while you were there?</p> <p>7 A. I didn't see any -- I didn't see him behave</p> <p>8 inappropriately towards female members of staff. He had</p> <p>9 a reputation for it, but I'd never seen any evidence of</p> <p>10 it.</p> <p>11 Q. Do you remember yesterday you were telling us about</p> <p>12 those "Speak Out" posters which were in the men's toilet</p> <p>13 opposite the detainee shop?</p> <p>14 A. Yes.</p> <p>15 Q. The ones which had scrawled across it "Snitches",</p> <p>16 "Grasses", "Don't be a rat"?</p> <p>17 A. Yes, sir.</p> <p>18 Q. Were those posters ever taken down and replaced?</p> <p>19 A. I can't remember, sir.</p> <p>20 Q. Were you ever aware of, for example, when the IMB were</p> <p>21 visiting, whether they may have used those lavatories,</p> <p>22 whether they ever commented on those posters?</p> <p>23 A. The IMB office was on the ground floor in a corridor in</p> <p>24 which detainees weren't permitted, so I can't see why</p> <p>25 they would go up onto the first floor onto a detainee</p> <p style="text-align: center;">Page 8</p>

<p>1 corridor and then use a toilet off of the detainee</p> <p>2 corridor.</p> <p>3 Q. So are you saying there are no circumstances in which</p> <p>4 any IMB visitor would have had access to that</p> <p>5 particular --</p> <p>6 A. They could have had access to it and, indeed, if they</p> <p>7 were walking past that toilet and they really needed to</p> <p>8 go, they could have used their keys and gone into the</p> <p>9 toilet and used the toilet. Nothing stopping them from</p> <p>10 using it if they wanted to.</p> <p>11 Q. As far as you know, if they did and if those posters</p> <p>12 were still there with that defacement on it, nothing</p> <p>13 ever happened about it?</p> <p>14 A. No.</p> <p>15 Q. Doing your best, how long do you think that poster, or</p> <p>16 those posters, were up with the words scrawled across</p> <p>17 them in the way you've described -- are we talking about</p> <p>18 weeks, months?</p> <p>19 A. Months. I used those association corridors a lot</p> <p>20 because I was an activities officer and I passed through</p> <p>21 that corridor often, and it was the toilet closest to</p> <p>22 the IT suite. So when I was working in the IT suite</p> <p>23 I would use that toilet opposite the detainee shop.</p> <p>24 Q. You said more than once the reason why eventually -- we</p> <p>25 will come to it, I promise, soon -- you went to the BBC</p> <p style="text-align: center;">Page 9</p>	<p>1 the key date is 1 May. That's right within our period</p> <p>2 of what we are looking at in the course of this inquiry.</p> <p>3 If we go, please, to the next page, you have got</p> <p>4 a series of dates when it was probably first written,</p> <p>5 back in June 2011, updated, version 2.3, right at the</p> <p>6 bottom of that series of dates, 1 April 2017 update, but</p> <p>7 according to the front page, as we saw, the version date</p> <p>8 was given as 1 May.</p> <p>9 So it's smack bang within what we have called our</p> <p>10 relevant period of April through to the end of August.</p> <p>11 Do you see in the box below "Internal distribution</p> <p>12 list", "All G4S employees"? So that rather suggests</p> <p>13 that all G4S employees, of which you were one during</p> <p>14 this period, would, or should, have got this document.</p> <p>15 Now, thinking back, did you get this document, even</p> <p>16 if you hadn't heard of it before, in or about May 2017?</p> <p>17 You were still there for two months to come, or</p> <p>18 more -- May, June, until early July when you left. Did</p> <p>19 you ever see this document?</p> <p>20 A. I don't remember seeing it.</p> <p>21 Q. If we look on the next page, please, under the heading</p> <p>22 "Introduction":</p> <p>23 "At G4S we all have a responsibility to ensure that</p> <p>24 we uphold our core business values, adhere to the law</p> <p>25 and deliver against the important commitments set out in</p> <p style="text-align: center;">Page 11</p>
<p>1 rather than complain to a manager and rather than</p> <p>2 whistleblow, blow the whistle. Can we just look,</p> <p>3 please, momentarily, at the G4S whistleblowing policy.</p> <p>4 I will ask for that to go up on screen. Chair, it's in</p> <p>5 your files at B/107.</p> <p>6 If we can put up, please, <CJS000707>, please, at</p> <p>7 page 1. Now, forgive me if I have misremembered what</p> <p>8 you said yesterday, but I think you told us that you</p> <p>9 didn't become aware that there was a whistleblowing</p> <p>10 policy until much later; is that right?</p> <p>11 A. I didn't become aware of the confidential whistleblowing</p> <p>12 channel until after the Medway programme.</p> <p>13 Q. Did you also tell us that you weren't aware of this</p> <p>14 policy at the time of your training?</p> <p>15 A. We were never told about this policy. We were told to</p> <p>16 raise concerns to DCMs, if we had them.</p> <p>17 Q. Let's just then look at what this has to say. I have</p> <p>18 been asked to ask you these questions in particular on</p> <p>19 behalf of G4S. So we'd like you, please, to consider</p> <p>20 this policy document.</p> <p>21 If you look at the bottom, you will see that there</p> <p>22 are boxes which deal with the version control of</p> <p>23 the policy, and you can see the version date is</p> <p>24 1 May 2017, although it was said to expire two years</p> <p>25 later; in other words, when it might be revised. But</p> <p style="text-align: center;">Page 10</p>	<p>1 our business ethics policy.</p> <p>2 "To help strengthen our culture of ethics and</p> <p>3 integrity, one of our core values, employees are</p> <p>4 strongly encouraged to report concerns about wrongdoing,</p> <p>5 such as breaches of laws, regulations or company policy.</p> <p>6 This will help G4S to develop an open culture in the</p> <p>7 dealings between its managers, employees and those with</p> <p>8 whom it engages.</p> <p>9 "The Group's whistleblowing policy is to be made</p> <p>10 publicly available and awareness of the whistleblowing</p> <p>11 system will be communicated regularly to every employee</p> <p>12 through a wide range of channels such as induction</p> <p>13 courses, welcome documentation, notice boards,</p> <p>14 intranets, and policy manuals."</p> <p>15 Pausing there, if that paragraph is accurate, it</p> <p>16 says it will be communicated regularly, rather than has</p> <p>17 been communicated, but let's assume that this was the</p> <p>18 original draft from as early as 2011 and it hadn't</p> <p>19 changed all the way through its different revisions:</p> <p>20 "... will be communicated regularly to every</p> <p>21 employee through a wide range of channels such as</p> <p>22 induction courses ..."</p> <p>23 Did you see this in any induction course?</p> <p>24 A. No.</p> <p>25 Q. "... welcome documentation ..."</p> <p style="text-align: center;">Page 12</p>

<p>1 Did you receive any form of welcome documentation</p> <p>2 when you joined the company, or a welcome pack --</p> <p>3 A. We received quite a big, thick welcome pack.</p> <p>4 Q. Do you remember seeing this document or anything like</p> <p>5 it?</p> <p>6 A. No, sir.</p> <p>7 Q. "... notice boards ..."</p> <p>8 Did you see this up on notice boards around the</p> <p>9 centre?</p> <p>10 A. I only saw the whistleblowing notice -- the notice</p> <p>11 boards with the whistleblowing helpline or</p> <p>12 whistleblowing channel, much later on, after the Medway</p> <p>13 programme.</p> <p>14 Q. Which was 11 or 12 January 2016?</p> <p>15 A. Mmm-hmm.</p> <p>16 Q. "... intranets ..."</p> <p>17 Was there an intranet that you had access to?</p> <p>18 A. I'm sorry, sir, I don't even know what that is.</p> <p>19 Q. You spoke about a database --</p> <p>20 A. Oh, I see.</p> <p>21 Q. No, no, but an intranet would be -- unlike the internet,</p> <p>22 it's an intranet within an organisation. So it's like</p> <p>23 an internet, but it's limited to people who have access</p> <p>24 to it within an organisation. So was there a G4S</p> <p>25 intranet to which you had access?</p> <p style="text-align: center;">Page 13</p>	<p>1 Q. "... - Serious Wrongdoing":</p> <p>2 "Speak Out is G4S' global whistleblowing system,</p> <p>3 hosted by an independent specialist hotline and case</p> <p>4 management provider.</p> <p>5 "Speak Out offers a free of charge telephone service</p> <p>6 and web-reporting, operating 24 hours a day, seven days</p> <p>7 a week, with language translation facilities and</p> <p>8 provides a confidential channel for employees to report</p> <p>9 concerns about serious wrongdoing."</p> <p>10 It gives the contact details with certainly, if</p> <p>11 there is an online version, apparent hyperlinks:</p> <p>12 "Serious wrongdoing is behaviour or actions such as</p> <p>13 major breaches of group policy or the law, actions that</p> <p>14 pose a real and significant threat to the well-being or</p> <p>15 safety of its employees or others or that may cause</p> <p>16 serious financial loss. Serious wrongdoing should</p> <p>17 usually be reported where appropriate to your line</p> <p>18 manager or local human resources manager in the first</p> <p>19 instance."</p> <p>20 Pausing there, who would have been your line</p> <p>21 manager. If you had been aware of this policy -- let's</p> <p>22 assume you had it and you'd read it through and you</p> <p>23 understood what its terms were and how you could use it.</p> <p>24 If, in the first instance, you felt, rather than run off</p> <p>25 to the BBC, as you did, that you should approach your</p> <p style="text-align: center;">Page 15</p>
<p>1 A. I was aware of the G4S -- we had access to all the</p> <p>2 computers and on which you had your own user name and</p> <p>3 you could access the internet and you could access the</p> <p>4 G4S database to look up information about detainees.</p> <p>5 I wasn't aware of a policy being made available on any</p> <p>6 of these computers.</p> <p>7 Q. "... and policy manuals."</p> <p>8 Did you get a policy manual?</p> <p>9 A. It's possible that at some point I did get a policy</p> <p>10 manual in my training. As I say, we got a big, thick</p> <p>11 kind of booklet. Perhaps hidden in there somewhere,</p> <p>12 there's something about whistleblowing that existed.</p> <p>13 But there was no effort to communicate a whistleblowing</p> <p>14 policy directly to staff.</p> <p>15 Q. Then under the next heading, "G4S Speak Out ...", so</p> <p>16 that's the title that was given to the posters you've</p> <p>17 been telling us about?</p> <p>18 A. Yes, sir.</p> <p>19 Q. So we are clear, I keep on calling it "a poster or</p> <p>20 posters". Was it one poster?</p> <p>21 A. Just an A4 piece of paper.</p> <p>22 Q. That was it?</p> <p>23 A. Mmm.</p> <p>24 Q. Laminated or --</p> <p>25 A. Laminated.</p> <p style="text-align: center;">Page 14</p>	<p>1 line manager, who would you have regarded as your line</p> <p>2 manager?</p> <p>3 A. I think this part of the policy was -- actually was</p> <p>4 communicated verbally, in that, you know, as I said</p> <p>5 yesterday, we were told that we could contact DCMs in</p> <p>6 the first instance if we had concerns about treatment of</p> <p>7 detainees. My line manager technically was a man called</p> <p>8 Ramon Giraldo. He was the manager of the activities</p> <p>9 department. But he had very little interaction or</p> <p>10 involvement with detainees because he was responsible</p> <p>11 for managing activities.</p> <p>12 Q. Was he a DCM?</p> <p>13 A. He was technically a DCM, yes.</p> <p>14 Q. What do you mean by "technically"?</p> <p>15 A. Well, he had quite a -- his role was very different to</p> <p>16 that of most DCMs, in that he just oversaw -- he was</p> <p>17 just responsible for the activities department. He</p> <p>18 didn't kind of -- he didn't kind of oversee use of</p> <p>19 force, planned uses of force.</p> <p>20 Q. Or go on wings?</p> <p>21 A. Or attend wings much or carry out assessments on</p> <p>22 detainees when filling out ACDTs with regard to</p> <p>23 self-harm and suicide. So he had little involvement in</p> <p>24 the lives of detainees. The DCMs who were</p> <p>25 responsible -- the DCMs who I was -- who I felt I would</p> <p style="text-align: center;">Page 16</p>

<p>1 go to to complain about -- I should go to to complain</p> <p>2 about abuse were the DCMs in the residential units</p> <p>3 because that is where the abuse happened, and it was</p> <p>4 under their management that I was working when</p> <p>5 I witnessed abuse, quite often, so people like Purnell,</p> <p>6 Dave Roffey, Nathan Ring, the DCMs who were in charge of</p> <p>7 the units in which abuse was happening to whom I should</p> <p>8 be complaining, that's the way I saw it, were so</p> <p>9 involved in the abuse that I couldn't go to them.</p> <p>10 Q. Who was your local human resources manager?</p> <p>11 A. I don't know, sir.</p> <p>12 Q. Was there a local human resources manager that you were</p> <p>13 aware of, even if you didn't know the identity of</p> <p>14 the person?</p> <p>15 A. If there was one, I wasn't aware of them.</p> <p>16 Q. If we just look up, about the policy itself, that</p> <p>17 paragraph from which I just read:</p> <p>18 "Serious wrongdoing is behaviour or actions such as</p> <p>19 major breaches of group policy or the law, actions that</p> <p>20 pose a real and significant threat to the well-being or</p> <p>21 safety of its employees or others ..."</p> <p>22 This is obviously the group policy, so it's not</p> <p>23 exactly geared towards life at Brook House. But was</p> <p>24 this message, looking back now, possibly communicated to</p> <p>25 you when you were trained?</p> <p style="text-align: center;">Page 17</p>	<p>1 as confidential. In order to fully investigate issues</p> <p>2 raised and to comply with applicable laws and</p> <p>3 regulations, certain information relating to the issue</p> <p>4 will need to be shared. Anyone investigating a report</p> <p>5 will be required to keep all information confidential.</p> <p>6 "While we encourage you to identify yourself,</p> <p>7 anonymous calls will be taken equally seriously and</p> <p>8 investigated as fully as possible. However, the</p> <p>9 effectiveness of any investigation may be limited if you</p> <p>10 choose not to be identified. Subject to local</p> <p>11 legislative restrictions, it is your decision if you</p> <p>12 choose to remain anonymous and there will never be any</p> <p>13 attempt by the company to track or covertly discover</p> <p>14 a whistleblower's identity."</p> <p>15 So G4S says you can remain anonymous, but if you do,</p> <p>16 it may make our investigation a little more difficult.</p> <p>17 They take it seriously. But the messaging here is about</p> <p>18 respecting you and the information you give but</p> <p>19 promising it will be taken seriously. Was that message</p> <p>20 ever conveyed to you, that you remember now?</p> <p>21 A. No, sir.</p> <p>22 Q. The woman you told us about whom you became close to,</p> <p>23 just so that we are clear, did she complain to a manager</p> <p>24 or did she, to your knowledge, use this policy?</p> <p>25 A. My understanding is that she complained to the member of</p> <p style="text-align: center;">Page 19</p>
<p>1 A. The only messaging from the G4S policy about</p> <p>2 whistleblowing that was communicated to us in our</p> <p>3 training was that, if you have concerns about staff</p> <p>4 behaviour, whether it's towards detainees or anybody</p> <p>5 else, then you speak to a DCM in the first instance.</p> <p>6 Q. Then under the heading "Other Concerns":</p> <p>7 "Other concerns such as pay-related queries, uniform</p> <p>8 issues, co-worker disputes or general employment</p> <p>9 grievances should be directed to a line manager,</p> <p>10 supervisor or local care-line."</p> <p>11 Then to the next page, please, at the top:</p> <p>12 "Anonymity and Confidentiality.</p> <p>13 "All concerns raised in good faith will be taken</p> <p>14 seriously and treated with respect. Any misuse or</p> <p>15 reporting of alleged wrongdoing that is known not to be</p> <p>16 correct is unacceptable and will be addressed by the</p> <p>17 company.</p> <p>18 "The most effective way to raise a concern is to do</p> <p>19 so openly. Openness makes it easier to assess the</p> <p>20 concern, investigate where appropriate and to obtain</p> <p>21 more information if required.</p> <p>22 "However, we understand that in certain</p> <p>23 circumstances, you may wish to report an issue</p> <p>24 confidentially. Subject to any legal restrictions, in</p> <p>25 all circumstances, G4S treats all information reported</p> <p style="text-align: center;">Page 18</p>	<p>1 the SMT.</p> <p>2 Q. The SMT. So she went up the line --</p> <p>3 A. That's what I think.</p> <p>4 Q. -- to a senior management person. Do you know who that</p> <p>5 person was?</p> <p>6 A. No, sir.</p> <p>7 Q. Then back to the policy, "Process for Dealing with</p> <p>8 Whistleblowing Matters". It talks about teamwork and</p> <p>9 collaboration being "one of our core values"; that when</p> <p>10 issues arise the best way to deal with them is for</p> <p>11 employees to do so with their managers and colleagues</p> <p>12 and to resolve them together constructively:</p> <p>13 "We expect our managers to encourage a culture where</p> <p>14 employees are confident they can raise concerns without</p> <p>15 fear of retaliation, and to respond to genuine issues</p> <p>16 raised by employees in a constructive way."</p> <p>17 Fear and retaliation is something you have been</p> <p>18 telling us about, isn't it?</p> <p>19 A. This policy sounds lovely.</p> <p>20 Q. "In the first instance, we encourage you to raise your</p> <p>21 concerns through your normal reporting line, HR manager</p> <p>22 or the G4S lawyer that supports your team."</p> <p>23 Was there a G4S lawyer that supports your team?</p> <p>24 A. Not that I was aware of, sir, no.</p> <p>25 Q. "If you wish to report a serious wrongdoing or the</p> <p style="text-align: center;">Page 20</p>

<p>1 matter involves a senior manager (such as members of 2 the business, country or regional management or the 3 group executive committee) you can contact the G4S Speak 4 Out hotline or website to report these matters. 5 "Once the details have been logged by Speak Out, the 6 compliance and ethics team will assess and respond to 7 your concern, performing any necessary investigation in 8 line with group standards. 9 "We will ensure that you are not punished in any way 10 for raising a concern in good faith, even if it 11 transpires it was unfounded or the information provided 12 was inaccurate. 13 "If you raise a concern, you will be taken seriously 14 and respected. Any harassment or informal pressure 15 placed upon employees raising concerns will not be 16 tolerated and will be treated as victimisation, which is 17 a serious offence in accordance with company 18 disciplinary procedures. 19 "If, however, you misuse the Speak Out website or 20 hotline, or you knowingly make false allegations, this 21 would be unacceptable and would be treated as a serious 22 disciplinary matter." 23 Then it lists, subject to regional legislative 24 restrictions, what serious wrongdoing looks like: 25 "Breaches of law or regulation.</p> <p style="text-align: center;">Page 21</p>	<p>1 question is. 2 A. Very little, sir. Very little is relevant. 3 Q. What, in particular, do you think is not relevant to 4 people who were in your position at Brook House? 5 A. "Price fixing, other cartel or anti-competitive 6 activity. 7 "Insider trading". 8 Q. Forget that particular. What about the generality? For 9 example, reporting to line managers, G4S lawyers, human 10 resources, people -- 11 A. Line managers was applicable, and we were told to do 12 that. But in terms of human resources and lawyers, 13 I mean, I didn't even know -- we had no idea we could do 14 that. I certainly didn't. I should say, though, even 15 if this was communicated to us, which it wasn't, would 16 I have had any confidence going to G4S about my 17 concerns? I don't think so. I mean, because there was 18 a culture in Brook House which was so hostile towards 19 whistleblowing. After the Panorama, you may have seen 20 Peter Neden and Jerry Petherick giving evidence to the 21 Home Affairs Committee, and they told us that not 22 a single G4S employee in the relevant period raised 23 a concern about staff treatment of detainees, and yet 24 it's clear from the evidence that I amassed at 25 Brook House, and from the video footage, that there were</p> <p style="text-align: center;">Page 23</p>
<p>1 "... 2 "Harassment or discrimination involving senior 3 management." 4 I'm just picking out two or three: 5 "Criminal offences, violence or threats of violence 6 by senior managers ..." 7 Then at the bottom: 8 "Any person raising a concern via Speak Out will 9 be ..." 10 And you will see: 11 "Advised how their concern will be handled. 12 "Given an estimate of how long the investigation 13 will take", and so on and so forth. 14 Just reading it through together, Mr Tulley, as we 15 have, and knowing what you now know, this policy, being 16 a group policy, and not limited to Brook House, does it 17 speak of relevance to what goes on in Brook House? Is 18 it a policy that works in Brook House from the 19 Brook House you knew? 20 A. Well, the policy was never communicated to us -- 21 Q. No, no, my point is a different one. Now you've read it 22 through with me, we understand that this is a group 23 policy, it applies across the board. Speak Out is 24 a group-wide whistleblowing policy. But, looking at it, 25 does it feel relevant to Brook House? That's what my</p> <p style="text-align: center;">Page 22</p>	<p>1 members of staff who were otherwise well behaving 2 officers present in instances of abuse, and no-one 3 complained. No-one went through the whistleblowing 4 channel because no-one had any faith that complaining to 5 G4S would be anything other than fruitless, and the 6 confidence that staff had, and you will see it in the 7 footage and my evidence, the confidence that staff had 8 to flagrantly brag about the mistreatment of detainees 9 and speak in derogatory or even racist terms about them 10 in front of groups of officers demonstrated the faith 11 that they had in the culture of silence which allowed 12 the abuse to persist because they knew staff would never 13 complain, and I'm sure some staff were aware of this 14 policy. I wasn't. But, in any case, I probably 15 wouldn't have raised concerns even if I did. 16 Q. We are coming in a moment to your initial contact with 17 the BBC, but before I do that -- and obviously that was 18 the decision ultimately that you made, and you were 19 influenced, if not encouraged, by viewing that Medway 20 Secure Training Centre programme in January 2016. How 21 was it affecting you, from all of the experiences you 22 had? You'd been at the centre, effectively, by that 23 time around a year, almost? 24 A. Yes, sir. 25 Q. Was it impacting your personal life, what you were</p> <p style="text-align: center;">Page 24</p>

<p>1 seeing?</p> <p>2 A. Well, as I say, I had decided that I would quit before</p> <p>3 I'd seen the Medway programme, and I was writing up my</p> <p>4 resignation letter. I started working there when I was</p> <p>5 18. I was a year on, obviously I was 19, and, you know,</p> <p>6 whilst my mates had gone off to university, I was</p> <p>7 cutting ligatures and responding to self-harm incidents</p> <p>8 and witnessing abuse and it just -- it was having</p> <p>9 a detrimental effect on my mental health and on the</p> <p>10 relationships around me, on my refereeing career, which</p> <p>11 I was still pursuing at that point. And so I -- you</p> <p>12 know, I didn't feel like I could blow the whistle to</p> <p>13 anyone. Journalists were never on my radar, never</p> <p>14 something I considered, so I decided that I would leave.</p> <p>15 Q. But what you did do was to email the Panorama programme?</p> <p>16 A. Yes.</p> <p>17 Q. Was that to become directly involved, or did you think</p> <p>18 that Panorama would themselves just become involved in</p> <p>19 Brook House as a result of what you were to tell them?</p> <p>20 A. I hoped, when I emailed them, that they would eventually</p> <p>21 send in one of their own undercover reporters, and there</p> <p>22 would be a similar kind of programme. I never thought</p> <p>23 I would need to stay in there for another 14 months</p> <p>24 providing them with information. But I never really</p> <p>25 wanted to leave without complaining -- without</p> <p style="text-align: center;">Page 25</p>	<p>1 A. Well, after the incident I spoke about yesterday, in</p> <p>2 which a detainee was mocked and humiliated whilst</p> <p>3 standing naked in front of at least five members of</p> <p>4 staff, I had gone -- when I was refereeing, when I was</p> <p>5 younger, I would keep -- I would record instances of --</p> <p>6 I would make notes after games that I'd refereed, things</p> <p>7 that had gone badly, as a way of kind of managing my</p> <p>8 emotions and reflecting on things. As I was -- I didn't</p> <p>9 really want to tell anyone what I was seeing at</p> <p>10 Brook House. I certainly didn't want to tell my mum</p> <p>11 because she found me the job in the first place and she</p> <p>12 would have been upset to have sort of -- it was because</p> <p>13 of her that I was working there, really, because she</p> <p>14 found the job. So I was keeping notes in a little black</p> <p>15 pocketbook that I used to keep my refereeing notes in</p> <p>16 about instances of abuse that concerned me and were</p> <p>17 upsetting me, and it was just a way of me managing my</p> <p>18 emotions.</p> <p>19 Q. What happened to that notebook?</p> <p>20 A. Well, the BBC never asked for it until much later, by</p> <p>21 which time I looked for it but I couldn't find it.</p> <p>22 Q. Having sent that email to Panorama, was there</p> <p>23 a response?</p> <p>24 A. There was a response, yes.</p> <p>25 Q. How immediate?</p> <p style="text-align: center;">Page 27</p>
<p>1 complaining in some form, because the guilt that you --</p> <p>2 that I would have carried around would have been</p> <p>3 difficult to live with. It was only when it became too</p> <p>4 much that I decided that, selfishly, I would quit.</p> <p>5 I was open to an opportunity to complain in some form.</p> <p>6 It just never came about until I saw the Panorama. And</p> <p>7 then I thought I should stay until Panorama had</p> <p>8 responded or give them at least some time to respond to</p> <p>9 my email.</p> <p>10 Q. Now, tell us, what did you say in the email, just so</p> <p>11 that we have an idea. If the Medway programme went out</p> <p>12 on 11 or 12 January 2016, how soon after that did you</p> <p>13 send your email?</p> <p>14 A. I think I sent it on 12 January 2016, so either the day</p> <p>15 after I watched the programme or on the same day.</p> <p>16 Q. Who did you send the email to?</p> <p>17 A. There's just a generic BBC Panorama email.</p> <p>18 Q. What did you say in the email?</p> <p>19 A. I said -- I can't remember off the top of my head, word</p> <p>20 for word, but it was something along the lines of, "I've</p> <p>21 seen the Medway programme. I'm an officer at</p> <p>22 Brook House. I've been keeping a record of what I've</p> <p>23 been witnessing. I am concerned about the treatment of</p> <p>24 detainees", or words to that effect.</p> <p>25 Q. And the record you'd been keeping, what was that?</p> <p style="text-align: center;">Page 26</p>	<p>1 A. Quite quick, I think. I think it was a matter of days.</p> <p>2 Q. Who was it who got in touch with you?</p> <p>3 A. A journalist called Guy Grandjean.</p> <p>4 Q. Did you speak to Mr Grandjean?</p> <p>5 A. I did.</p> <p>6 Q. On the phone?</p> <p>7 A. Yes, and I visited him in London at new Broadcasting</p> <p>8 House.</p> <p>9 Q. We don't have to go into all of the ins and outs of</p> <p>10 the processes, because that's not really what this</p> <p>11 inquiry is all about, but just to help people understand</p> <p>12 how, really, we got to where we are now, what was</p> <p>13 arranged between you after that first meeting?</p> <p>14 A. Well, I was not working for the BBC. I was --</p> <p>15 Q. No, no.</p> <p>16 A. -- working with the BBC.</p> <p>17 Q. Yes.</p> <p>18 A. It was agreed that I would provide them with</p> <p>19 information, intelligence, about what I was seeing in</p> <p>20 Brook House. There was no promise that they would send</p> <p>21 in one of their reporters, but they were keen to find</p> <p>22 out what was happening in the detention centre.</p> <p>23 I mean, for me, it was difficult because I didn't</p> <p>24 know -- I would like to have known -- I would like to</p> <p>25 have been given a yes or no answer. If the answer was,</p> <p style="text-align: center;">Page 28</p>

<p>1 "No, we are not interested", I could have just quit and 2 tried to move on with my life, but the answer was, "We 3 might, but there's no guarantee, so if you want to 4 leave, you can leave". There was never pressure on me 5 to remain working there if that's not what I wanted to 6 do. But, I mean, in reality, as I said, I felt guilty 7 about the things I'd seen and even though I never 8 participated in abuse, I was still a cog in an inhumane 9 machine in which people -- which drove people to, you 10 know, complete despair.</p> <p>11 So I always felt a sense of guilt about working 12 there, and I saw what -- you know, my work with the BBC 13 as an opportunity to try and change that. So whilst 14 I was never technically under pressure from the BBC to 15 remain there, I felt the burden and the responsibility 16 to continue working there because I didn't know how else 17 change might come about, if the BBC didn't. So for as 18 long as the BBC were remotely interested, I was intent 19 on sticking around, with the hope that, if they did make 20 a film, it would bring about some closure of my own.</p> <p>21 I was young and naive then. I thought, as soon as 22 people saw the realities inside Brook House, there would 23 be widespread cause for change and the Home Office would 24 apologise for what was happening under their watch. But 25 obviously none of that -- that certainly didn't happen.</p> <p style="text-align: center;">Page 29</p>	<p>1 yesterday, the chickenpox outbreak --</p> <p>2 A. Yes.</p> <p>3 Q. -- which meant you were transferred to Tinsley House. 4 That was March 2016?</p> <p>5 A. Yes, sir.</p> <p>6 Q. How long were you at Tinsley for?</p> <p>7 A. A couple of weeks, sir.</p> <p>8 Q. And what, once the chickenpox outbreak was, what, clear 9 or it was safe for you to come back to work at 10 Brook House, you did?</p> <p>11 A. Yes, when it was clear, yes, sir.</p> <p>12 Q. You say that you returned to Brook House in the middle 13 of April 2016. I'm picking that up from paragraph 85 of 14 your inquiry statement. You remained in touch with 15 Mr Grandjean all the time up to that point, but you say 16 your primary contact, point of contact, at the BBC 17 changed in mid April to the Panorama producer, 18 Joe Plummet?</p> <p>19 A. Plomin, sir, yes.</p> <p>20 Q. What was the point of that? Why did he take over?</p> <p>21 A. At the time, I wasn't quite sure, to be honest, but then 22 it became clear to me that the BBC were probably getting 23 more serious about the prospect of an undercover 24 investigation because Joe Plomin has overseen some of 25 the BBC's most high-profile undercover investigations.</p> <p style="text-align: center;">Page 31</p>
<p>1 I mean, a few members of staff got sacked, but what else 2 has really changed? But at the time, I thought, you 3 know, if people were given an insight into what it's 4 like in there, then, you know, society, the public, 5 people won't stand for it.</p> <p>6 Q. So you carry on working at Brook House, feeding 7 information to the BBC from time to time, presumably?</p> <p>8 A. Yes. I was effectively a mole for the BBC for 14 months 9 before wearing secret cameras. I was making diary 10 entries every day after every shift, and then, on my 11 days off, I was sending those notes to the BBC. I would 12 just take pictures of the notes and send them on.</p> <p>13 Q. Were they the notes I referred to some minutes ago, 14 those contemporaneous diaries, several of them that you 15 made? Are those the notes you are talking about?</p> <p>16 A. Yes, I continued making notes when I started working for 17 the BBC.</p> <p>18 Q. We have got notes before and we have got notes 19 afterwards?</p> <p>20 A. Yes, the notes from the point at which I made contact 21 with the BBC, we have copies of all of them.</p> <p>22 Q. You've seen them, obviously?</p> <p>23 A. Yes. I made them, so ...</p> <p>24 Q. Yes. So you carry on working at Brook House, apart from 25 one break, and that was something you referred to</p> <p style="text-align: center;">Page 30</p>	<p>1 The Medway one, for example, you may remember the 2 Winterbourne View undercover in which people with 3 learning difficulties were being abused in a care home. 4 So he's kind of the BBC's top dog, if you like, in terms 5 of managing undercover investigations.</p> <p>6 Q. So cutting, perhaps, matters short, you carried on 7 making the notes. That was a suggestion, I think, that 8 they -- you were asked to carry on making those 9 contemporaneous diaries, and you did. There came 10 a point where you became an employee of the BBC?</p> <p>11 A. Yes, sir.</p> <p>12 Q. Just tell us a little about that, how that came about 13 and when it came about?</p> <p>14 A. Well, a year after giving evidence to the BBC --</p> <p>15 Q. Hold on. "Giving evidence". You mean giving 16 information?</p> <p>17 A. Yes.</p> <p>18 Q. So where do you fix in time a year after giving an 19 account to the BBC? What month are we talking about?</p> <p>20 A. So the Medway programme goes out on --</p> <p>21 Q. January?</p> <p>22 A. -- 11 January/12 January. I blow the whistle at that 23 point. 13/14 months later --</p> <p>24 Q. So, what --</p> <p>25 A. -- and during those 14 months I've been giving</p> <p style="text-align: center;">Page 32</p>

<p>1 information to the BBC.</p> <p>2 Q. Yes.</p> <p>3 A. So, on that prima facie evidence, and that of another</p> <p>4 G4S employee, Nathan Ward, the BBC feels it should and</p> <p>5 that it is in the public interest to investigate</p> <p>6 Brook House.</p> <p>7 Q. So at that point, Panorama decides to, what, use you as</p> <p>8 an undercover operative, an undercover reporter?</p> <p>9 A. Yes.</p> <p>10 Q. Is it at that point you become an employee?</p> <p>11 A. Yes, sir, around 6 March 2017.</p> <p>12 Q. Around that time, when you formally began your</p> <p>13 employment with the BBC -- and this is paragraph 90</p> <p>14 onwards of your inquiry statement -- between</p> <p>15 6 March 2017 and 23 April 2017, did you complete</p> <p>16 a period of training with the BBC?</p> <p>17 A. Yes, sir.</p> <p>18 Q. How did you do that when you were still working at</p> <p>19 Brook House?</p> <p>20 A. On my days off, sir.</p> <p>21 Q. So, what, weekends or other days off?</p> <p>22 A. I would have -- yes, I'd work an average of four days</p> <p>23 a week, 48 hours a week, 13-hour shifts, 52 hours a week</p> <p>24 if you include the unpaid breaks, so, yes, but I would</p> <p>25 have three days off a week, so ...</p> <p style="text-align: center;">Page 33</p>	<p>1 "Panorama, Undercover: Brook House". So it already had</p> <p>2 a title, the programme, at that point, by the look of</p> <p>3 it, or a working title, perhaps?</p> <p>4 A. Maybe, sir.</p> <p>5 Q. "PROTOCOL FOR UNDERCOVER OPERATIVE":</p> <p>6 "This document is intended as GUIDANCE, not as</p> <p>7 prescriptive. It is impossible to outline every</p> <p>8 possible scenario.</p> <p>9 "in the event that the safety of detainees or</p> <p>10 officers, the safety of our operative ..."</p> <p>11 Which is you:</p> <p>12 "... and/or the integrity of our journalistic</p> <p>13 enterprise is best safeguarded by deviating from our</p> <p>14 documents that is what our operative should do --</p> <p>15 however, wherever practicable that should be in</p> <p>16 consultation with the producer and editorial policy</p> <p>17 advisers.</p> <p>18 "Where the operative is in any doubt they should</p> <p>19 consult with the production team but can also contact</p> <p>20 the external risk specialists we have engaged to support</p> <p>21 this operation."</p> <p>22 Then the contents of the document are set out:</p> <p>23 "Risk Assessment.</p> <p>24 "Legal and Employer Guidelines Our Operative Must</p> <p>25 Consider.</p> <p style="text-align: center;">Page 35</p>
<p>1 Q. Would that mean travelling to London for training?</p> <p>2 A. Yes. Also, I think I took some annual leave around that</p> <p>3 time as well --</p> <p>4 Q. Yes?</p> <p>5 A. -- to allow me some time to train.</p> <p>6 Q. What did the training consist of?</p> <p>7 A. Well, I had to undergo all the compulsory sort of</p> <p>8 general training that BBC Panorama employees have to</p> <p>9 undergo, so media law and anti-bribery, BBC's editorial</p> <p>10 guidelines, stuff that's really required of all BBC</p> <p>11 employees. And then there was specific training around</p> <p>12 the use of secret cameras and associated techniques.</p> <p>13 Yeah, there was a -- quite a lot of focus was on that.</p> <p>14 I was obviously introduced to the kit I would be</p> <p>15 wearing, how to wear it. I mean, there's only so much</p> <p>16 I can say.</p> <p>17 Q. The "kit" obviously being a microphone and a camera.</p> <p>18 I'm not going to ask you anything technical about that,</p> <p>19 for obvious reasons, but that's the kit that you mean?</p> <p>20 A. Yes, sir.</p> <p>21 Q. What I'd like to do, please, is to just look together</p> <p>22 with you at a document we all have, which is the</p> <p>23 protocol for undercover operatives. It's <CPS000025>,</p> <p>24 if we can put that up, please. We will start at the</p> <p>25 first page. Can we just look at the header. Thank you.</p> <p style="text-align: center;">Page 34</p>	<p>1 "Guiding Principles.</p> <p>2 "Privacy.</p> <p>3 "Hypothetical Examples."</p> <p>4 Under "Risk Assessment":</p> <p>5 "Please note that the risk assessment is the primary</p> <p>6 document and should always be read in preference to this</p> <p>7 document ..."</p> <p>8 So we understand it, was that a completely different</p> <p>9 document from what we are now looking at? Was there</p> <p>10 a risk assessment document?</p> <p>11 A. There was, sir, yes.</p> <p>12 Q. Do you have it?</p> <p>13 A. No, sir. The BBC will have it, though.</p> <p>14 Q. Then "Legal and Employer Guidelines Our Operative Must</p> <p>15 Consider". You will remember we looked at this</p> <p>16 yesterday, rule 45. We went through that. Over the</p> <p>17 page, please. I'm not going to read all of it, but the</p> <p>18 document is adduced in full and will be published in</p> <p>19 full, subject to redaction. Then at 3, towards the</p> <p>20 bottom, "Guiding Principles":</p> <p>21 "However, our evidence suggests that other members</p> <p>22 of staff may carry out actions that do not meet those</p> <p>23 (or indeed external legal/guideline) requirements.</p> <p>24 Other members of staff may instruct the Undercover</p> <p>25 Operative to assist them when they are doing something</p> <p style="text-align: center;">Page 36</p>

<p>1 the Undercover Operative believes to be wrong. Other</p> <p>2 members of staff may ask the Undercover Operative to</p> <p>3 encourage them or to comment on their behaviour.</p> <p>4 "Our operative will need to weigh every situation</p> <p>5 against the broad protocol that:</p> <p>6 "- Unless there is a good reason not to, our</p> <p>7 operative should comply with requests -</p> <p>8 "- Our operative must not cause any harm or break</p> <p>9 the law themselves [except where agreed, for example</p> <p>10 bringing cameras into a centre] -</p> <p>11 "- Our operative must not encourage anyone else to</p> <p>12 cause harm or break the law -</p> <p>13 "- Our operative must keep themselves safe -</p> <p>14 "- Our operative should neither cause nor encourage,</p> <p>15 but also will not be able to prevent all wrongdoing by</p> <p>16 others -</p> <p>17 "- Where there is a significant risk of imminent,</p> <p>18 serious harm to an individual, our operative needs to be</p> <p>19 prepared to intervene directly/immediately. Any</p> <p>20 intervention by the operative also needs to be</p> <p>21 appropriate -</p> <p>22 "- Our operative should minimise the impact of their</p> <p>23 secret filming on the privacy of detainees, as much as</p> <p>24 it is possible to do so - "</p> <p>25 It tells you in the final two lines of that</p> <p style="text-align: right;">Page 37</p>	<p>1 A. Yes. It was important not to ask leading questions</p> <p>2 because you can't be seen to be on a fishing expedition.</p> <p>3 You know, you ask open questions so people have the</p> <p>4 opportunity to answer one way or another. You're not</p> <p>5 kind of cornering someone. So, "What do you make of</p> <p>6 this?"; "What do you make of that"? It's up to you how</p> <p>7 you answer such a question. There is nothing suggestive</p> <p>8 in such a question.</p> <p>9 Q. Can we go, please, to page 13, because I want to ask you</p> <p>10 about something else that appears in this document. If</p> <p>11 you go to the top of the page, you will see the date</p> <p>12 19 April 2017, "DAY MINUS TWO CAMERAS (BEFORE START --</p> <p>13 KIT FAILURE)". First of all, sometimes the kit didn't</p> <p>14 work, and filming failed. Whose notes are these?</p> <p>15 A. These are the BBC production team's notes.</p> <p>16 Q. I'm told it's called an incident log.</p> <p>17 A. Yes, sir.</p> <p>18 Q. Where did the content come from?</p> <p>19 A. So the -- Joe Plomin, the producer/director or</p> <p>20 Josh Reynolds, the assistant producer, will have gone</p> <p>21 over the footage and made these notes. So on this day</p> <p>22 of the kit failure, I think I was recording in terms of</p> <p>23 my -- the microphones were picking up the sound but the</p> <p>24 visuals weren't there. So they were still able to get</p> <p>25 the gist of what was happening. So although there was</p> <p style="text-align: right;">Page 39</p>
<p>1 particular section if you were discovered, you leave the</p> <p>2 place?</p> <p>3 A. Yes, sir, if it was possible.</p> <p>4 Q. "Privacy", that you had to be aware that secret</p> <p>5 recording potentially breaches the privacy of detainees,</p> <p>6 and you had that in mind throughout your filming?</p> <p>7 A. Yes, sir. And staff.</p> <p>8 Q. Sorry?</p> <p>9 A. And staff.</p> <p>10 Q. Then over the page, we have "Handling of material",</p> <p>11 which I'm not going to go into. Then, at the bottom,</p> <p>12 "Hypothetical examples". There is a series of</p> <p>13 hypothetical examples, lots of "what ifs", to help you,</p> <p>14 in your position, to understand what you could and</p> <p>15 couldn't or should and shouldn't do, but these were only</p> <p>16 hypothetical. Presumably, when you were involved,</p> <p>17 yourself, in filming, you had to make decisions as and</p> <p>18 when they were necessary?</p> <p>19 A. Yes, sir.</p> <p>20 Q. We often see, while I have this in mind, or, perhaps</p> <p>21 more accurately, hear you, question other officers,</p> <p>22 "What would you do if ...", "What do you think of ..."</p> <p>23 so these are open, if you likes, non-leading questions?</p> <p>24 A. Yes.</p> <p>25 Q. Were they deliberate?</p> <p style="text-align: right;">Page 38</p>	<p>1 a kit failure, I think they have still made some notes</p> <p>2 here about what they believe was happening on this</p> <p>3 shift.</p> <p>4 Q. These were not your notes?</p> <p>5 A. No, sir.</p> <p>6 Q. This was not as a result of a debrief of you at the end</p> <p>7 of the day? This was them taking, at the end of</p> <p>8 the day, the film from you --</p> <p>9 A. Yes, sir.</p> <p>10 Q. -- and doing whatever they do with it -- listening to it</p> <p>11 or watching it or both?</p> <p>12 A. Yes, sir.</p> <p>13 Q. And then recording on this incident log what they see</p> <p>14 and hear?</p> <p>15 A. Yes, sir. So I'd film. When I got back from my shift,</p> <p>16 I'd give them the card and then the next day, whilst</p> <p>17 I was on shift, they would usually review the footage</p> <p>18 that I'd filmed the previous day.</p> <p>19 Q. Can we go to the very end of this document, just to</p> <p>20 see -- I'm not going to go through the content. We may</p> <p>21 come back to one or two later. Right at the end,</p> <p>22 page 37, please, the penultimate page. The very last</p> <p>23 day of this, it's 6 July 2017, which is the day you</p> <p>24 quit, finally, and walk out.</p> <p>25 A. Yes, sir.</p> <p style="text-align: right;">Page 40</p>

<p>1 Q. So a series of logs, incident logs, of what happened</p> <p>2 according to the footage.</p> <p>3 A. Yes, sir.</p> <p>4 Q. Did you think that the training that you had was</p> <p>5 sufficient to equip you for the reality of acting as an</p> <p>6 undercover operative?</p> <p>7 A. Yes, sir.</p> <p>8 Q. Were you confident in what you did?</p> <p>9 A. It's hard to be -- as confident as you can be wearing</p> <p>10 secret cameras into a prison with hostile staff. I'd be</p> <p>11 lying if I said I wasn't in a complete state of anxiety</p> <p>12 for the two and a half months that I was wearing secret</p> <p>13 cameras. Was that because of a lack of confidence? No.</p> <p>14 It was just a fear of being caught.</p> <p>15 Q. Did the BBC provide you with support throughout?</p> <p>16 A. Yes.</p> <p>17 Q. What kind of support, in a word or two?</p> <p>18 A. Well, the BBC has sort of internal people that you can</p> <p>19 go to if you are struggling with your mental health, but</p> <p>20 they also provided me with a psychiatrist,</p> <p>21 Professor Peter Kinderman, who was responsible for</p> <p>22 looking after me. I think he's a Professor of</p> <p>23 Psychology at the University of Liverpool or something.</p> <p>24 He was there whenever I needed him. And I did --</p> <p>25 I often used his support. It was tough. You know,</p> <p style="text-align: right;">Page 41</p>	<p>1 but were there typical situations in which you would</p> <p>2 decide, "I, Callum Tulley, am now going to turn on the</p> <p>3 camera for this or that reason and then I'm going to</p> <p>4 turn it off". What were the decisions you were making</p> <p>5 and why?</p> <p>6 A. It would require, sir, a judgment call on your part.</p> <p>7 I mean, if a first response is called -- and the first</p> <p>8 response is when there's essentially an emergency</p> <p>9 announced on the radio -- then that's a good indication</p> <p>10 that something of note is going to happen. So you turn</p> <p>11 your camera on. Similarly, if you are walking onto the</p> <p>12 solitary confinement block or onto segregation where</p> <p>13 most of -- we know from the evidence I amassed, that's</p> <p>14 where a lot of the abuse would take place, so you were</p> <p>15 more likely to switch your camera on whilst on the</p> <p>16 block. Equally, if you were in the gatehouse, you were</p> <p>17 very unlikely to turn on your secret camera because --</p> <p>18 Q. Nothing is going to happen?</p> <p>19 A. Precisely, sir.</p> <p>20 Q. So that was the way you --</p> <p>21 A. Yes.</p> <p>22 Q. -- ran things?</p> <p>23 A. It would require a judgment call. Sometimes you'd turn</p> <p>24 on the camera because you'd think a conversation is</p> <p>25 going in one direction but actually it goes in</p> <p style="text-align: right;">Page 43</p>
<p>1 you're working in complete secrecy, you can't tell your</p> <p>2 friends or your family, and you're bearing witness to</p> <p>3 stuff which is troubling you. Yeah, it's -- the</p> <p>4 psychological support from the BBC was welcome.</p> <p>5 Definitely.</p> <p>6 Q. The nature of the camera itself -- as I say, I don't</p> <p>7 want particularly technical detail, but you deal with</p> <p>8 this at paragraph 100, page 24 of your inquiry</p> <p>9 statement. You say it had a variable battery life,</p> <p>10 usually in the region of four hours?</p> <p>11 A. Yes, sir.</p> <p>12 Q. Your shifts, as you have told us more than once, were</p> <p>13 13 hours long so it wasn't possible to keep the camera</p> <p>14 running at all times during the shift. But at all</p> <p>15 events, you wouldn't keep the camera continuously</p> <p>16 running but you would switch it on and off as necessary;</p> <p>17 is that right?</p> <p>18 A. Yes, sir.</p> <p>19 Q. In line with the guidelines you'd been trained in,</p> <p>20 particularly guidance regarding minimising impact on the</p> <p>21 privacy of detainees and staff.</p> <p>22 A. Yes, sir.</p> <p>23 Q. Just as an aside, just help us: what was it that would</p> <p>24 lead you to switch the camera on and off? In other</p> <p>25 words, in what kind of -- maybe you can't generalise,</p> <p style="text-align: right;">Page 42</p>	<p>1 a different direction, and at that point you're sort of</p> <p>2 unnecessarily filming, and there are a couple of options</p> <p>3 to you. The first is that you can just switch the</p> <p>4 camera off. If that is going to arouse suspicion, which</p> <p>5 it would most likely do if you were in front of</p> <p>6 colleagues, then you can try and sort of get up and go</p> <p>7 to the toilet, so continue filming but not pick up any</p> <p>8 of the sort of collateral material. Yes. But, I mean,</p> <p>9 it's important to know that any -- anything that was</p> <p>10 filmed that wasn't, you know, of note or in the public</p> <p>11 interest was only seen by a very limited number of BBC</p> <p>12 colleagues. I'd be surprised if it was as much as half</p> <p>13 a dozen. So any invasions of privacy were treated very</p> <p>14 seriously and seen by as few people as possible.</p> <p>15 Q. I mean --</p> <p>16 A. It was inevitable, because of the nature of secret</p> <p>17 filming, that you are going to pick up some stuff</p> <p>18 sometimes, but every effort was made for that not to</p> <p>19 happen.</p> <p>20 Q. In one sense, much of what you filmed was private to</p> <p>21 somebody?</p> <p>22 A. Yes.</p> <p>23 Q. What did you regard as an invasion of privacy for the</p> <p>24 purposes of filming?</p> <p>25 A. Well, I remember sitting in the E wing office and there</p> <p style="text-align: right;">Page 44</p>

<p>1 was a conversation about a detainee which I felt we</p> <p>2 should be recording but the conversation quickly turned</p> <p>3 to the officer and his wife and kids. That was</p> <p>4 a scenario when I was able to stand up and just leave</p> <p>5 the wing office. But that's an example of, you know,</p> <p>6 stuff that doesn't need to be recorded.</p> <p>7 Q. Was there anything in particular as regards any detained</p> <p>8 persons that you felt overstepped the mark so that you</p> <p>9 shouldn't film?</p> <p>10 A. Not that I can remember, sir. I mean, I never felt like</p> <p>11 I shouldn't be -- I mean, I never decided to film when</p> <p>12 I knew I shouldn't be. There were just times when</p> <p>13 I thought, "Okay, I'm still rolling now, and the moment</p> <p>14 has passed, the incident is over, you need to leave or</p> <p>15 turn it off when it's appropriate".</p> <p>16 Q. At the end of the shift, you would drive to an agreed</p> <p>17 location, where you would meet the producers. Would</p> <p>18 that be the time that you would record your video</p> <p>19 diaries?</p> <p>20 A. Yes, sir.</p> <p>21 Q. What was the point of the video diary? Was that just to</p> <p>22 record what had happened? What we sometimes see is you</p> <p>23 being asked to repeat the same account time and again or</p> <p>24 you've forgotten something or perhaps you think you can</p> <p>25 put it in a better way. Was the idea of the video diary</p> <p style="text-align: center;">Page 45</p>	<p>1 We saw that date on the incident log:</p> <p>2 "... to 7 July inclusive."</p> <p>3 In fact, the last day was 6 July:</p> <p>4 "In my police witness statement, I referred ..."</p> <p>5 You made a police witness statement to Sussex Police</p> <p>6 when they were investigating certain incidents, or one</p> <p>7 incident in particular:</p> <p>8 "In my police witness statement, I referred to there</p> <p>9 being 33 video diaries recorded during the period</p> <p>10 24 April to 6 July 2017, which was an inadvertent</p> <p>11 calculation error which came to light when the BBC</p> <p>12 disclosed all the diaries to [the] Inquiry ..."</p> <p>13 But you say, in fact, you recorded video diaries on</p> <p>14 36 days during the period. After, you say, you</p> <p>15 completed the video diary, you would then complete your</p> <p>16 written diary entry as well, and we have those.</p> <p>17 A. Yes, sir.</p> <p>18 Q. "I always completed written notes and these record the</p> <p>19 events of the relevant shift."</p> <p>20 Then just reading in what you said at paragraph 103:</p> <p>21 "Once I had completed my video and written diary</p> <p>22 entries, I would talk with the Panorama production team.</p> <p>23 We would discuss the day's shift, and often the previous</p> <p>24 day's footage [as I indicated earlier and you agreed]</p> <p>25 which they had reviewed. The team might ask questions</p> <p style="text-align: center;">Page 47</p>
<p>1 not just a record but also potentially something that</p> <p>2 might go out on the Panorama programme?</p> <p>3 A. Yes, precisely. I mean, it's a record to start with,</p> <p>4 but also it might help narrate the film, so there was</p> <p>5 sort of -- in terms of production value, there was also</p> <p>6 a need to do it as well.</p> <p>7 Q. My memory serves me, but maybe you will correct me,</p> <p>8 I think there was only one video diary that actually</p> <p>9 went out on the programme, and that was the 25 April</p> <p>10 one, I think, or am I wrong about that?</p> <p>11 A. I think there was more, sir, if I'm honest.</p> <p>12 Q. Was there more?</p> <p>13 A. Yes.</p> <p>14 Q. Okay. I haven't viewed the programme for a long time.</p> <p>15 A. Yes.</p> <p>16 Q. But it was a dual purpose to creating them?</p> <p>17 A. It helped bring the viewer through the film and</p> <p>18 understand what they were witnessing.</p> <p>19 Q. You say at paragraph 102:</p> <p>20 "In the video diary, I would summarise the shift [as</p> <p>21 you already agreed] and any particularly notable events</p> <p>22 which had occurred. I recorded ..."</p> <p>23 And these are the statistics:</p> <p>24 "I recorded video diaries on 38 days in total during</p> <p>25 the filming period, which was from 19 April ..."</p> <p style="text-align: center;">Page 46</p>	<p>1 about the footage or particular events shown in it, if</p> <p>2 I had not covered a particular point in my video and</p> <p>3 written entries for the last shift (or if they had</p> <p>4 a particular question, for example about the name of an</p> <p>5 officer or a detainee)."</p> <p>6 A. Yes, sir.</p> <p>7 Q. You say that if the production team asked about events</p> <p>8 on the footage, or if you remembered an event or</p> <p>9 a detail which you'd not mentioned in the written or</p> <p>10 your video diary for the previous shift, you'd make</p> <p>11 a supplemental note to that written entry, indicating</p> <p>12 that it had been added at a later stage and,</p> <p>13 occasionally, you'd also make a supplemental record by</p> <p>14 discussing an earlier incident in a later video diary?</p> <p>15 A. Yes, sir.</p> <p>16 Q. So that's the way it worked. Paragraph 105, you say</p> <p>17 your first day of successful filming, by which you mean</p> <p>18 without any kit failure --</p> <p>19 A. Yes, sir.</p> <p>20 Q. -- at Brook House was on 24 April?</p> <p>21 A. Yes, sir.</p> <p>22 Q. The last day of filming, and your last day at</p> <p>23 Brook House, was, in fact, 6 July 2017. Again, the</p> <p>24 numbers: from 24 April to 6 July inclusive, you worked</p> <p>25 37 shifts at Brook House, you successfully undertook</p> <p style="text-align: center;">Page 48</p>

<p>1 secret filming on 34 of those 37 shifts, and the</p> <p>2 incident log, which we have up on screen, records that</p> <p>3 there were equipment failures on certain days of</p> <p>4 the filming -- we don't have to look at them, but this</p> <p>5 incident log records those failures. We have already</p> <p>6 seen one.</p> <p>7 Moving on, then, please, from that to some other</p> <p>8 aspects of your time at Brook House. And while I have</p> <p>9 it in mind, one of the questions which one of the core</p> <p>10 participants has asked me to ask on their behalf, and</p> <p>11 this is on behalf of one of the solicitors firms acting</p> <p>12 for a number of detained persons. It is something</p> <p>13 really I touched on yesterday and we will come to some</p> <p>14 of the examples later of particular incidents, but while</p> <p>15 I have it in mind, you started work, as you have told</p> <p>16 us, there in 2015?</p> <p>17 A. Yes, sir.</p> <p>18 Q. The development of your thinking and what you did as</p> <p>19 a result of your views of what was going on really began</p> <p>20 quite early on, and it developed through to 2016 when</p> <p>21 you saw the Medway programme. You sent your email. You</p> <p>22 kept your diary of events. And then you went through</p> <p>23 the process you've just been telling us about.</p> <p>24 What we would like to understand, please, Mr Tulley,</p> <p>25 so that we can always have this in mind, because, of</p> <p style="text-align: center;">Page 49</p>	<p>1 A. I do, and -- I think I do, anyway.</p> <p>2 Q. In other words, are they simply representative of</p> <p>3 something that you weren't able to film because you</p> <p>4 hadn't gone to the BBC? Was all of this stuff going on</p> <p>5 in much the same way --</p> <p>6 A. Yes.</p> <p>7 Q. -- throughout that period? That's really the question?</p> <p>8 A. I suppose the reason why the inquiry are interested in</p> <p>9 the relevant period, April to August --</p> <p>10 Q. Is because of your filming?</p> <p>11 A. -- is because of my filming, but to me it's -- the years</p> <p>12 and months before that were just as relevant, if not</p> <p>13 more relevant, because at least I was able to capture</p> <p>14 some of the abuse during -- between March and --</p> <p>15 between April and August. You know, to be honest, it's</p> <p>16 not the things I saw whilst secretly filming undercover</p> <p>17 which trouble me most, because at least I filmed it so</p> <p>18 the world can see it. But it's the stuff that</p> <p>19 I witnessed before I started wearing secret cameras.</p> <p>20 I know you're going to ask me about one incident in</p> <p>21 particular. You know, that's the hardest stuff, because</p> <p>22 those officers have gotten away with it and it seems G4S</p> <p>23 and the Home Office are only being held accountable for</p> <p>24 the months of April to August, and I hope that's not</p> <p>25 going to be the case, because the abuse was not</p> <p style="text-align: center;">Page 51</p>
<p>1 course, you know that we are going to pluck out events</p> <p>2 during our relevant period, from -- with one exception,</p> <p>3 I am going to ask you about something that happened and</p> <p>4 you witnessed on 6 March 2016, but apart from that, we</p> <p>5 are looking at events from April through to the end</p> <p>6 of August?</p> <p>7 A. Yes, sir.</p> <p>8 Q. Well, in fact, July, as far as you're concerned, because</p> <p>9 you stopped filming in early July. So what we would</p> <p>10 like to understand from you is the extent to which what</p> <p>11 you filmed between April and July 2017 represented</p> <p>12 events which had gone before -- for example,</p> <p>13 from January 2015 to early 2016, that period you were</p> <p>14 telling us about, and then from January early</p> <p>15 2016/February 2016 onwards, through to July 2017 when</p> <p>16 you left. But, really, the whole period, because it's</p> <p>17 important that when, eventually, we come to hear your</p> <p>18 evidence about and view certain clips of footage, it</p> <p>19 could be tempting to think that that's it, that's the</p> <p>20 high point. What we really want to understand from you</p> <p>21 is, should we be thinking that is it, that's all it is,</p> <p>22 and that that period we have characterised as the</p> <p>23 relevant period is all that Brook House is about, or did</p> <p>24 it really start from the beginning when you started</p> <p>25 working there? Do you understand the question?</p> <p style="text-align: center;">Page 50</p>	<p>1 exclusive to those months.</p> <p>2 Q. Of course, one of the things, in fact, I described</p> <p>3 during the course of the opening statement was the</p> <p>4 incident on 25 April, the Paschali incident, to which we</p> <p>5 will come. Would you say that that was the high point</p> <p>6 of anything that you saw during your time there? If my</p> <p>7 memory serves me, during the video diary that you made</p> <p>8 afterwards, you made comment that that was off the</p> <p>9 scale, or a different scale to anything that you'd ever</p> <p>10 seen. Is that right or is that a complete outlier?</p> <p>11 A. I think the Paschali choke on D1527 was -- there's two</p> <p>12 incidents which were kind of off the scale, and that was</p> <p>13 one of them. Another one was before I started wearing</p> <p>14 secret cameras, which I think you're going to ask me</p> <p>15 about shortly.</p> <p>16 Q. Which date is that, the 6 March one, 2016?</p> <p>17 A. Yes, I think that's right, in which a mentally ill</p> <p>18 detainee was mocked by two DCMs whilst --</p> <p>19 Q. Roffey and --</p> <p>20 A. -- covered in his own faeces on the segregation --</p> <p>21 Q. We will come to that.</p> <p>22 A. But those two incidents, they were rare. But they were</p> <p>23 only incidents that I saw -- you know, yesterday,</p> <p>24 I spoke to you about whether I believed the</p> <p>25 George Michael mask incident. At the time, I didn't</p> <p style="text-align: center;">Page 52</p>

<p>1 believe it. But the sadistic way in which D1527 was</p> <p>2 abused and in which this Eritrean detainee was abused</p> <p>3 in March 2016, I later formed the view that perhaps it</p> <p>4 did happen. As I say, I've seen no evidence that it did</p> <p>5 happen, but it would no longer surprise me, because,</p> <p>6 although it was such an act of unbelievable cruelty,</p> <p>7 it's a level of cruelty I ended up witnessing at</p> <p>8 Brook House.</p> <p>9 Q. Yes.</p> <p>10 A. But I rarely saw incidents of such cruelty, but I did</p> <p>11 see them.</p> <p>12 Q. You're only one person. I think the point you're making</p> <p>13 is, there may have been other incidents you simply</p> <p>14 weren't present for, whether before you started filming</p> <p>15 or during?</p> <p>16 A. Indeed.</p> <p>17 Q. Let me ask you this: did anybody ever bring to your</p> <p>18 attention anybody to whom you were close and perhaps was</p> <p>19 in the same camp as you, if I can call it that, any</p> <p>20 instances which came close to the two instances in</p> <p>21 particular you're talking about?</p> <p>22 A. Not that bad. Not that bad.</p> <p>23 Q. So we might be able to treat these as our high points.</p> <p>24 There was a lot in between, about which you will be</p> <p>25 telling us, but was there a lot of low-level stuff as</p> <p style="text-align: center;">Page 53</p>	<p>1 you weren't seeing abuse, you know, the indefinite</p> <p>2 nature of the detention still remained, and that was the</p> <p>3 most destructive element of detention. I mean, it</p> <p>4 was -- it destroyed detainees, it completely stripped</p> <p>5 them of any sort of hope. You could see the</p> <p>6 deterioration in the well-being of detainees over time,</p> <p>7 arriving at the centre with some hope that if they kept</p> <p>8 themselves together, things would be fine, and as the</p> <p>9 weeks and months would pass on and there was no prospect</p> <p>10 of release or removal, you know, you'd see people that</p> <p>11 were sort of seemingly together and -- become -- you</p> <p>12 know, start to self-harm, take drugs or attempt to take</p> <p>13 their own lives. You know, it was -- and perhaps if you</p> <p>14 asked D1527 what the worst element of detention was,</p> <p>15 he'll say it was when Paschali choked him. But I'm</p> <p>16 sure, for many detainees, it was not the abuse that was</p> <p>17 the worst element, it was the indefinite nature of</p> <p>18 the detention which was the hardest thing, and that was</p> <p>19 visible. It was a tangible impact that you could see</p> <p>20 with your own eyes as an officer, because I worked there</p> <p>21 for two and a half years.</p> <p>22 Q. What about --</p> <p>23 A. So I wasn't someone that came in and left -- you know,</p> <p>24 left because they couldn't -- I mean, people started</p> <p>25 working at Brook House and they just quickly left</p> <p style="text-align: center;">Page 55</p>
<p>1 well?</p> <p>2 A. I mean, you heard about assaults, you heard about abuse</p> <p>3 and physical mistreatment of detainees. But just not as</p> <p>4 bad as -- not as horrific as the ones we are going to be</p> <p>5 talking about this week.</p> <p>6 Q. What about really low-level stuff? Was there anything</p> <p>7 that you would sort of classify or categorise as just</p> <p>8 the ordinary, I mean, real banter that perhaps wasn't as</p> <p>9 important as some of the other things you'll be telling</p> <p>10 us about?</p> <p>11 A. What do you mean, sir, sorry?</p> <p>12 Q. Well, low-level misconduct or exchanges --</p> <p>13 A. That was just everyday -- that was the culture. I mean,</p> <p>14 yeah, there was -- yeah, there was just low-level</p> <p>15 banter, if you want to call it that, that was</p> <p>16 unprofessional and -- yeah.</p> <p>17 Q. All right --</p> <p>18 A. Do you want me to give examples?</p> <p>19 Q. No, no, we will come to other examples, I'm sure, but</p> <p>20 perhaps therein lies the difficulty of trying to</p> <p>21 categorise these things too closely?</p> <p>22 A. It's hard to kind of -- I mean, perhaps this is</p> <p>23 a transgression, so I apologise, but you were constantly</p> <p>24 bearing witness to the conditions in which the detainees</p> <p>25 were held. So even if you went through phases in which</p> <p style="text-align: center;">Page 54</p>	<p>1 because it was such a bleak place, so perhaps some staff</p> <p>2 didn't see the impact of indefinite detention on</p> <p>3 detainees. As someone that worked there for two and</p> <p>4 a half years, not only would you see people first</p> <p>5 arrive, you know, presenting themselves well, clean</p> <p>6 shaven, wearing a suit, making their legal appointments</p> <p>7 with their solicitors and, you know, trying to be</p> <p>8 positive, because they shouldn't be -- you know, they'd</p> <p>9 say, "I shouldn't be here. I won't be here for long.</p> <p>10 You know, I'm going to get myself out of here". When it</p> <p>11 would become apparent to them that that was not the</p> <p>12 case, it was disastrous the impact that this would have</p> <p>13 on them, people going into Brook House without real</p> <p>14 mental health problems of their own, without being</p> <p>15 professional, you could see that they were developing.</p> <p>16 Q. And so we have got two aspects is what you are talking</p> <p>17 about. One shouldn't focus too closely just on the</p> <p>18 incidents, the individual incidents themselves?</p> <p>19 A. Yes.</p> <p>20 Q. Secondly, it was the individual conditions for</p> <p>21 individuals, how long they were actually going to be</p> <p>22 there. And there's a third, really, isn't there: the</p> <p>23 conditions of detention themselves, in other words, the</p> <p>24 lavatories, food, all of these things, the conditions</p> <p>25 generally?</p> <p style="text-align: center;">Page 56</p>

<p>1 A. Yes.</p> <p>2 Q. We will talk a little about that later.</p> <p>3 A. It's easy to focus on the abuse, sir, but you set that</p> <p>4 aside and it's a system which strips people of all their</p> <p>5 hope, and because -- just because someone is released --</p> <p>6 you know, I'd see people returning -- a detainee</p> <p>7 released on bail only to return a few weeks later, and</p> <p>8 then they're in an even worse state because they are</p> <p>9 going to have to go through it all over again. There</p> <p>10 was a conveyor belt of detainees. You'd start seeing</p> <p>11 the same faces, only greyer hair, more wrinkles, longer</p> <p>12 beards, because they started to become less well kept</p> <p>13 and gain weight and some of them would start to take</p> <p>14 drugs or, as I say, self-harm. It was such a -- it was</p> <p>15 just grim, the harm that it was having on people who</p> <p>16 weren't even being abused, you know, physically, by</p> <p>17 staff.</p> <p>18 Q. Yes. One more --</p> <p>19 A. And --</p> <p>20 Q. Carry on.</p> <p>21 A. Just one other thing I'd say is, it's also -- if you</p> <p>22 focus on the individuals who were abusing detainees,</p> <p>23 that's also kind of missing the point because it's clear</p> <p>24 from the evidence that I amassed during my time at</p> <p>25 Brook House that, although the abuse of detainees was</p> <p style="text-align: center;">Page 57</p>	<p>1 exchanges or in what was going on, why would that be?</p> <p>2 I can give you a couple of examples in a second.</p> <p>3 A. Yes.</p> <p>4 Q. But in general terms?</p> <p>5 A. Well, in general, you had to maintain your cover.</p> <p>6 That's the simple answer.</p> <p>7 Q. Maintaining your legend as a legitimate DCO, certainly</p> <p>8 somebody who wasn't acting undercover?</p> <p>9 A. Precisely. I couldn't give any indication to anyone</p> <p>10 that I was acting undercover. I mean, of course, when</p> <p>11 D1527 was choked, I -- that was an occasion on which</p> <p>12 I had to intervene as envisaged in the undercover</p> <p>13 protocol which governed my role as a BBC journalist.</p> <p>14 But it was important for me to, on the most part, not</p> <p>15 encourage nor discourage anything that was -- anything</p> <p>16 wrong. I mean, I needed to be a fly on the wall and</p> <p>17 I couldn't have people suspecting me, so at times it</p> <p>18 might have been necessary, in order to maintain my</p> <p>19 cover, to carry myself in such a way that I wasn't to be</p> <p>20 suspected.</p> <p>21 Q. Let me then give you a couple of examples. Can we put</p> <p>22 up on screen a transcript, please, <TRN0000002></p> <p>23 EPE OPERATOR: I have just lot connection to the internet.</p> <p>24 MR ALTMAN: I wonder if the transcribers have a problem too.</p> <p>25 Chair, can we invite you to rise for as long as it</p> <p style="text-align: center;">Page 59</p>
<p>1 consistent throughout my time there, the officers and</p> <p>2 managers responsible for it changed over time, so it</p> <p>3 wasn't because of -- the abuse was not because of a few</p> <p>4 bad apples operating unbeknown to others, but it was</p> <p>5 because of systemic cultural problems which gave rise to</p> <p>6 such abuse and allowed it to fester and go unchecked.</p> <p>7 So when an abusive member of staff left, you know, they</p> <p>8 were just replaced by others because it was -- you know,</p> <p>9 the system permitted such behaviour.</p> <p>10 MR ALTMAN: We will stop there for the moment, I think,</p> <p>11 Mr Tulley. It's about 11.23 am. Chair, shall I suggest</p> <p>12 we should aim to come back at about 11.40 am, if that's</p> <p>13 not too short a break?</p> <p>14 THE CHAIR: Thank you very much.</p> <p>15 (11.24 am)</p> <p>16 (A short break)</p> <p>17 (11.45 am)</p> <p>18 MR ALTMAN: Mr Tulley, we have been asked on behalf of</p> <p>19 Owen Syred, who is another core participant in this</p> <p>20 inquiry, to ask you a few questions about the nature of</p> <p>21 what you were doing.</p> <p>22 As far as you're concerned, clearly you were filming</p> <p>23 incidents, you were occasionally asking open questions,</p> <p>24 in the way that you described a little earlier.</p> <p>25 If, on occasions, we see you participate in the</p> <p style="text-align: center;">Page 58</p>	<p>1 takes?</p> <p>2 (11.47 am)</p> <p>3 (A short break)</p> <p>4 (12.05 pm)</p> <p>5 MR ALTMAN: Thank you. I was about to ask to put up on</p> <p>6 screen <TRN0000002> and this is a transcript of</p> <p>7 something that happened after the choke-hold incident on</p> <p>8 25 April. If we can just zoom in to the top line for</p> <p>9 the moment, just so that we can get into the -- no, the</p> <p>10 very top. The title of this page. Thank you. We will</p> <p>11 see this kind of reference often in the future, either</p> <p>12 when we come to play clips or we look at transcripts.</p> <p>13 I have no idea what "KENCOV" means, but the four digits</p> <p>14 are a reference, a number reference, that we will see</p> <p>15 change from time to time according to the footage we are</p> <p>16 looking at or the transcript from the footage that we</p> <p>17 are reading.</p> <p>18 The next number is of more importance and has more</p> <p>19 information in it, because in this instance it's</p> <p>20 "V2017", so that's the year date, "0425", 25 April 2017,</p> <p>21 and it is clip number 00021. I don't know if you are</p> <p>22 familiar with these, Mr Tulley, or not, but we have</p> <p>23 become fairly familiar with them. This is the kind of</p> <p>24 reference that we are going to see from time to time, as</p> <p>25 I say, on clip footage or transcripts from the footage.</p> <p style="text-align: center;">Page 60</p>

<p>1 In this instance -- we can zoom back out, please --</p> <p>2 this is a transcript of footage that you filmed after</p> <p>3 that incident on 25 April. Do you remember -- again, we</p> <p>4 will look at it later -- you went to the loo, where you</p> <p>5 broke down, and then, when you came out, this is</p> <p>6 a transcript of what we see.</p> <p>7 If we can just zoom in to the top half of</p> <p>8 the page -- forgive me, my fault, it is page 12 that we</p> <p>9 want to look at. The top half. Thank you. I don't</p> <p>10 know if you remember now, but you come out and we can</p> <p>11 see you say:</p> <p>12 "Are you all right, mate? You're good, yeah?"</p> <p>13 And somebody who is only identified as staffer</p> <p>14 number 5 says, "Yeah" and you say:</p> <p>15 "You all right? You have to go on ...", something</p> <p>16 is inaudible, "Good, yeah?"</p> <p>17 And then this:</p> <p>18 "Fuck off, don't touch my phone."</p> <p>19 Now, the question is, and the question that's been</p> <p>20 posed as part of the questions I was asking before we</p> <p>21 had to break, given everything that occurred -- you'd</p> <p>22 gone to the toilet and you'd broken down, we have seen</p> <p>23 that, certainly on Panorama, and you come out and you</p> <p>24 say that, was that genuine or were you just acting out</p> <p>25 a part? In other words, were you upset and did somebody</p> <p style="text-align: center;">Page 61</p>	<p>1 imperative for me not to be exposed. Whether it was</p> <p>2 a detainee or a member of staff who tried to touch my</p> <p>3 radio -- in this case, it was a detainee. I don't know</p> <p>4 why I refer to it as a phone. That risks exposure if</p> <p>5 they feel one of the many wires running through your</p> <p>6 body or the camera lens or the microphone or the battery</p> <p>7 pack. If they alert a member of staff, then that</p> <p>8 recording equipment is going to be taken from you, and</p> <p>9 I have no doubt that the footage I recorded would never</p> <p>10 have seen the light of day.</p> <p>11 So it was imperative for me to make it known to the</p> <p>12 detainee that he was not welcome to invade my personal</p> <p>13 space and touch my radio.</p> <p>14 So I could have communicated this in a couple of</p> <p>15 ways. I didn't want to use any force on the detainee.</p> <p>16 I didn't feel it was necessary. But I did feel it was</p> <p>17 necessary to say robustly to the detainee that he was</p> <p>18 not welcome to touch me. I could have used language in</p> <p>19 a strong manner. I could have probably shouted at the</p> <p>20 detainee and said, "Get off, step off, back off".</p> <p>21 Instead, I didn't shout, but I said, "Fuck off". It is</p> <p>22 regrettable language, but --</p> <p>23 Q. I'm not really asking you about the language. You know,</p> <p>24 it's language everybody is used to these days.</p> <p>25 A. Particularly in prisons.</p> <p style="text-align: center;">Page 63</p>
<p>1 try to touch your phone and did you say that because of</p> <p>2 upset, or was it for any other reason?</p> <p>3 A. Well, this -- I can remember this not particularly</p> <p>4 clearly because my memory relates to the choking</p> <p>5 incident, the attempts by the detainee to harm himself</p> <p>6 and the fear of being caught because the microphone</p> <p>7 became loose during the restraint --</p> <p>8 Q. Forgive me, when you're in the loo and you're filming</p> <p>9 that, there's a lot of f'ing and blinding.</p> <p>10 A. Yes.</p> <p>11 Q. But, at the same time, you do mention something to do</p> <p>12 with the microphone, "microphone has come loose"?</p> <p>13 A. I became aware during the restraint that a microphone</p> <p>14 became loose, so I was anxious not to be -- I thought</p> <p>15 I was going to be exposed. That was part of the reason</p> <p>16 why I went to the toilet -- one, because I was upset;</p> <p>17 two, because I was anxious about this microphone. This</p> <p>18 was the most distressing -- one of the most distressing</p> <p>19 things I'd ever seen in my life. I'd left the toilet --</p> <p>20 I wanted to run away from Brook House at the time, and</p> <p>21 I just had to return to E wing where I'd just witnessed</p> <p>22 a suicidal detainee being throttled and threatened to be</p> <p>23 put to sleep.</p> <p>24 I knew that in my possession, in my crotch, was an</p> <p>25 SD card which had this evidence of abuse on it. It was</p> <p style="text-align: center;">Page 62</p>	<p>1 Q. What I'm really asking you about, so that we understand,</p> <p>2 is -- because this was part of a theme we have been</p> <p>3 asked to put to you on behalf of one of the core</p> <p>4 participants -- whether that was poor behaviour by you,</p> <p>5 whether you were just acting out your legend, as it</p> <p>6 were, or whether you were genuinely upset at what had</p> <p>7 happened or was this a part of everything?</p> <p>8 A. It was a combination of all of those things. It was me</p> <p>9 protecting my cover, carrying myself in a way that</p> <p>10 didn't arouse suspicion in others, it was me trying to</p> <p>11 ensure that I wasn't exposed.</p> <p>12 Q. Yes.</p> <p>13 A. And it was me protecting my personal space, which had</p> <p>14 been invaded.</p> <p>15 Q. Where was the radio mounted at the time, or was it in</p> <p>16 your hand?</p> <p>17 A. On my hip, just to the right of the recorder.</p> <p>18 Q. A second example, and, as I say, we will come back to</p> <p>19 25 April later, which I am going to ask you about is one</p> <p>20 that we can also put up on screen, another transcript.</p> <p>21 Chair, I should have said that the first transcript, if</p> <p>22 you are making a note, is at your B/96, and the next one</p> <p>23 at B/101 is transcript 0000079, <TRN0000079>. We will</p> <p>24 see it is a different style of transcript because it's</p> <p>25 been transcribed by another outfit. This is KENCOV1027,</p> <p style="text-align: center;">Page 64</p>

<p>1 so we can see the number has changed. It's for 2 Wednesday, 31 May. If we go, please, to, first of all, 3 your witness statement, please, because you refer to it 4 at paragraph 159 onwards. So we can pick it up from 5 your witness statement. And in the transcript, at 6 page 7. We are going slightly forwards, but I just want 7 to deal with that now, and we will go back again. At 8 paragraph 159, you are dealing with meal times and food 9 and fluid refusal. Then at 161, this is the background 10 to what I'm going to ask you about in a moment: 11 "I observed a member of staff failing to properly 12 observe the monitoring requirement." 13 That's monitoring what, food? 14 A. Food and fluid intake, yes. 15 Q. As I say, we will deal with that a little later: 16 "On 31 May 2017, I reported a food refusal to 17 DCM Nathan Ring whilst covering a break on B wing. 18 A detainee, whose name I cannot now recall, had told me 19 that he was refusing food apparently because he had not 20 been transferred. I reported this to DCM Ring, who told 21 me to 'cross him off', ie record that the detainee had 22 eaten. DCM Ring then referred to the detainee in 23 disparaging terms and told me that he was aware the 24 detainee had said he was not going to eat unless he was 25 transferred. The detainee's name should not have been</p> <p style="text-align: center;">Page 65</p>	<p>1 A. To tick the checklist to say that he has eaten. 2 Q. So to pretend that somebody has eaten when, in fact, 3 they haven't? 4 A. Yes, sir. 5 Q. And you add "Because he's refusing" and Nathan Ring: 6 "Well, don't worry about him." 7 And you say: 8 "Shall I cross him off?" 9 Now, why are you offering to cross him off when 10 Nathan Ring says, "I will cross him off"? 11 A. The transcript is not right, I'm afraid. He says, "Oh, 12 fucking ... fucking cross him off, the prick". He 13 doesn't voluntarily say he'll cross him off. I think, 14 if we can look back at the footage, I think that will be 15 obvious to us. So I've been instructed by a manager, by 16 my superior, to cross him off and so I acted as 17 envisaged in the BBC protocol for undercover operatives 18 which governed my role as an undercover reporter and 19 I did as envisaged in that protocol. However, I did 20 still check that that was what he wanted me to do. So 21 I gave my manager, my superior, an opportunity to give 22 me some different advice, so I asked him again, 23 I checked, "Shall I cross him off?". 24 Q. He says: 25 "Yeah. Yeah. Penis --</p> <p style="text-align: center;">Page 67</p>
<p>1 'crossed off' because he had not eaten. This was the 2 mechanism for monitoring whether detainees were eating 3 and so no record was being made of his food refusal." 4 You refer to a note that you made in one of your 5 notebooks, which you do. We don't have to go to it now. 6 Let's just then look at the transcript, please, 7 because this is the transcript that relates to what you 8 have just said in your inquiry statement. You say: 9 "I will wait till ..." 10 Is that 107: 11 "... 107, he's not eaten so they won't transfer 12 him." 13 A. I went to room 107. 14 Q. Room 107? 15 A. Yes. 16 Q. So that's on that wing? 17 A. Yes, B wing room 107, "he's not eaten so they won't 18 transfer him". "Because they won't transfer him", 19 I think is what was said, actually. 20 Q. He says: 21 "Oh fucking [something] I will fucking cross him 22 off, the prick." 23 Let's be clear. "Crossing him off" -- and, again, 24 I'm going to ask you to explain this a bit more closely 25 in a while, but "crossing him off" means what?</p> <p style="text-align: center;">Page 66</p>	<p>1 "... 2 "Spat his dummy out. [Inaudible] he said 'what's 3 happening what happening'. Told him to 'wait' and he 4 just said 'well I'm not going to eat if you won't tell 5 me what's happening'. 'Okay see you later'. Penis." 6 You say: 7 "I said to him -- I said, 'Do you want to eat or 8 not'. 9 Then you say, according to this: 10 "... did you get any soup ...?" 11 A. Yes, Nathan wanted to get some soup for another 12 detainee. 13 Q. I see. And Ring says: 14 "I just chucked another bowl at him. What a needy 15 fucker he is." 16 Was the "needy fucker" the person you were 17 originally talking about or somebody entirely different? 18 A. It's about this -- a different detainee, who had 19 asked -- he was on crutches and in his cell. So he 20 asked DCM Ring if he would get him some soup. 21 Q. As you say a little further down, "He's got crutches"? 22 A. Yes. 23 Q. So that's just an example of, you say, not where you're 24 participating but where you are, in accordance with the 25 guidelines, which we referred to a little earlier,</p> <p style="text-align: center;">Page 68</p>

<p>1 acting out your role, but at the same time, in this</p> <p>2 instance, giving Nathan Ring an opportunity to make</p> <p>3 perfectly clear what he's telling you?</p> <p>4 A. Indeed, sir.</p> <p>5 Q. Or to countermand it.</p> <p>6 A. Indeed, sir. It was important for me to give him an</p> <p>7 opportunity to reconsider his instruction for me to</p> <p>8 cross him off. I think that was the responsible thing</p> <p>9 to do, given that I was being asked to do something</p> <p>10 which was wrong, and I knew it was wrong. But I had to</p> <p>11 act as envisaged in the undercover protocol because to</p> <p>12 do otherwise would have risked exposure.</p> <p>13 Q. Just so we understand, and perhaps I will ask you a bit</p> <p>14 more about this later, what difference does it make</p> <p>15 whether you -- I mean, in this instance, what difference</p> <p>16 did it make to anybody -- Nathan Ring in particular, to</p> <p>17 simply say, "This man has not eaten"? What skin off his</p> <p>18 nose was it to do the right thing rather than the wrong</p> <p>19 thing? What was the impact of all of this?</p> <p>20 A. I can't explain why managers mistreated detainees. They</p> <p>21 should offer that explanation themselves. But the</p> <p>22 impact of not recording food and fluid refusal, you are</p> <p>23 potentially missing a deterioration in a detainee's</p> <p>24 mental health. It was used to identify whether</p> <p>25 detainees were protesting or on hunger strike. And, of</p> <p style="text-align: center;">Page 69</p>	<p>1 to eat. He made that clear to me when he said he wasn't</p> <p>2 going to. Ring was intent on him not having his voice</p> <p>3 heard. That's the only conclusion I can draw from it.</p> <p>4 Because why else would you care? Just say he hasn't</p> <p>5 eaten. It's not exactly going to create a shedload of</p> <p>6 work for you. It's not like he was on sustained hunger</p> <p>7 strike. It appeared to be the first time he had refused</p> <p>8 food.</p> <p>9 Q. Unlike, for example, the incidents you gave us</p> <p>10 yesterday, with the American chap who was outside the</p> <p>11 activities office or the library and use of force was</p> <p>12 used on him, which you said was a matter of personal</p> <p>13 convenience at the end of a shift to those officers, was</p> <p>14 there any inconvenience to Nathan Ring in this example?</p> <p>15 A. Because I'm not -- because I wasn't a DCM, I don't know</p> <p>16 when DCMs would be required to kind of -- if there's</p> <p>17 a food and fluid refusal, then maybe it's on DCMs to</p> <p>18 fill out ACDT forms and alert healthcare to the food and</p> <p>19 fluid refusal, so maybe there was a -- maybe he didn't</p> <p>20 want to deal with the additional work that having to</p> <p>21 acknowledge a food and fluid refusal would cause. It's</p> <p>22 hard to tell if it just came out of pure apathy for the</p> <p>23 detainee or because he wanted to avoid personal</p> <p>24 inconveniences.</p> <p>25 Q. Let's look at the next page in this transcript. At the</p> <p style="text-align: center;">Page 71</p>
<p>1 course, it was an important part of monitoring their</p> <p>2 health. I mean, if a detainee is refusing to eat and</p> <p>3 there's no record of the food and fluid refusal, then</p> <p>4 the deterioration in health that comes as a consequence</p> <p>5 of that is going to go completely unnoticed and so it</p> <p>6 can't be addressed by healthcare staff.</p> <p>7 Q. During the next shift, if another manager did exactly</p> <p>8 the same thing, and in the next shift yet another</p> <p>9 manager did exactly the same thing and a DCO complied in</p> <p>10 the way that you apparently have on this occasion, then</p> <p>11 nobody knows that that man is not eating over three</p> <p>12 shifts?</p> <p>13 A. Indeed, sir.</p> <p>14 Q. But I still come back to, what difference did it make to</p> <p>15 Nathan Ring to say, "I'll cross him off" rather than do</p> <p>16 the right thing, or you cross him off, rather than do</p> <p>17 the right thing? Do you see what my question is?</p> <p>18 A. DCM Ring took pleasure in the suffering of detainees,</p> <p>19 and that's clear from the evidence that I have amassed</p> <p>20 and the evidence that I recorded whilst working at</p> <p>21 Brook House. So, I mean, I -- like you, I struggle to</p> <p>22 understand why someone would want to do that, but he</p> <p>23 clearly got a kick out of it. I mean, yeah, you're</p> <p>24 right, what's in it for him, other than the -- the</p> <p>25 detainee wanted to make some form of protest by refusing</p> <p style="text-align: center;">Page 70</p>	<p>1 top, Nathan Ring says:</p> <p>2 "This fucker here in the white T-shirt grey jeans."</p> <p>3 Was this yet another detained man?</p> <p>4 A. I think it's the same guy, actually.</p> <p>5 Q. "He is the one [you say] that said to me, he said he is</p> <p>6 not going to eat until he gets to do transfers."</p> <p>7 A. Yes, it's the same guy.</p> <p>8 Q. Ring says:</p> <p>9 "I said to him how you gonna get transferred, you</p> <p>10 [inaudible] yesterday. So, we picked him up this</p> <p>11 morning [inaudible] I wanna make enquiries, I want to</p> <p>12 see the Home Office, you been here a couple of days,</p> <p>13 they will see you in next couple of days if you want to</p> <p>14 see them then you have to apply then they will give you</p> <p>15 an appointment."</p> <p>16 Then you say "Yeah":</p> <p>17 "You can't book an appointment", says Nathan Ring.</p> <p>18 Then somebody else says something inaudible, and you</p> <p>19 say:</p> <p>20 "They're not going to know are they. That he is not</p> <p>21 eating."</p> <p>22 Pausing here, what are you saying?</p> <p>23 A. What's important here, first of all, sir, is, if you</p> <p>24 look at bullet point 225 when there's the "Male officer:</p> <p>25 [Inaudible]", there's a long pause of about two minutes</p> <p style="text-align: center;">Page 72</p>

<p>1 when we change location and we go into the B wing office</p> <p>2 and hand out some bats and have some conversations with</p> <p>3 some detainees.</p> <p>4 Q. Hand out some ...?</p> <p>5 A. Table tennis bats, sorry. All I'm doing here is just</p> <p>6 giving DCM Ring another opportunity to reconsider his</p> <p>7 instruction to me to cross the detainee's name off,</p> <p>8 because I was just checking, you know, is this really</p> <p>9 what he wants me to do. I mean -- and so I say to him</p> <p>10 again, "They're not going to know, are they? That he is</p> <p>11 not eating".</p> <p>12 Q. Who is the "they"?</p> <p>13 A. Healthcare, other officers who would need to be alert to</p> <p>14 food and fluid refusals on the wing.</p> <p>15 Q. Then you continue. There's something inaudible and it</p> <p>16 reads on the transcript -- and you will make the point,</p> <p>17 and I know that we all know that you have made</p> <p>18 a statement pointing out certain corrections, inevitably</p> <p>19 these transcripts and the people who are transcribing</p> <p>20 them weren't there --</p> <p>21 A. Indeed, yes.</p> <p>22 Q. -- and so there will be errors?</p> <p>23 A. I appreciate it's difficult.</p> <p>24 Q. We all appreciate that. But there's something inaudible</p> <p>25 here:</p> <p style="text-align: center;">Page 73</p>	<p>1 Q. "I don't know, I don't care"?</p> <p>2 A. I think so, but it's actually quite hard to tell on the</p> <p>3 footage as well, so I can see why this error has been</p> <p>4 made.</p> <p>5 Q. Let's go back, then. I have asked the questions which</p> <p>6 we were asked to, and agreed to, ask you about that.</p> <p>7 Can we just then go back and fill in some other</p> <p>8 information, please, and I pick it up at paragraph 113</p> <p>9 of your witness statement at page 26. It is really</p> <p>10 about your work. You have told us already that you</p> <p>11 became an activities officer, that you worked a 13-hour</p> <p>12 shift, 8.15, according to the statement, to 9.15 daily?</p> <p>13 A. Yes.</p> <p>14 Q. Was that an exceptional amount of hours or was it the</p> <p>15 same shift every DCO did?</p> <p>16 A. The activities DCOs did their shifts for 30 minutes and</p> <p>17 shorter, so, yes, 8.15 in the morning until 9.15 at</p> <p>18 night. The other officers would do 7.45 in the morning</p> <p>19 until 9.15 at night, so theirs were 13 and a half hours</p> <p>20 long, 30 minutes longer than ours.</p> <p>21 Q. Four days a week?</p> <p>22 A. Yes. They also worked nights. Activities officers</p> <p>23 didn't work nights.</p> <p>24 Q. So you didn't work nights?</p> <p>25 A. No, sir.</p> <p style="text-align: center;">Page 75</p>
<p>1 "... Keep knocking his name off no-one is going to</p> <p>2 know [inaudible] anyway."</p> <p>3 Were you making a statement there or were you just</p> <p>4 commenting on what the reality of that meant?</p> <p>5 A. It's another -- it's me giving him another opportunity</p> <p>6 to appreciate what he's asking me to do. You know, if</p> <p>7 a detainee's name is repeatedly knocked off, then the</p> <p>8 food and fluid refusal is going to be -- is going to go</p> <p>9 unrecorded. And I'm just reminding him of that.</p> <p>10 Q. I take it you don't know now what the very first word</p> <p>11 that was missed was? Might it have been, for example,</p> <p>12 "if", "If you keep knocking his name off", something</p> <p>13 like that?</p> <p>14 A. I don't think it was, to be honest. I'm just -- but if</p> <p>15 you listen to the tone in which it's said -- it's hard</p> <p>16 to tell, of course, on the transcript. It's not an</p> <p>17 instruction. It's not, you know, "Keep knocking his</p> <p>18 name off because no-one is going to know anyway", it's</p> <p>19 "Keep knocking his name off no-one is going to know he</p> <p>20 hasn't eaten". That's the tone in which it was said.</p> <p>21 It's a reminder to Ring that, if we keep falsifying this</p> <p>22 document, no-one will know he's protesting.</p> <p>23 Q. And he says, "Nobody will then care ..."?</p> <p>24 A. I think that's a slight mistake, so I think he says,</p> <p>25 "Don't know, I don't care".</p> <p style="text-align: center;">Page 74</p>	<p>1 Q. One of the problems -- this isn't a criticism -- of your</p> <p>2 filming is, unless you get any outside indicators or you</p> <p>3 see a clock on the wall, you don't know what time it is?</p> <p>4 A. Mmm.</p> <p>5 Q. So sometimes we have to guess or, as I say, we pick it</p> <p>6 up from other material, but in some cases we may never</p> <p>7 know what the time was, but because of what you just</p> <p>8 told us, we can always assume, in your case, it has to</p> <p>9 be between the hours of 8.15 and 9.15?</p> <p>10 A. Yes, sir, that's right. I mean, what I would do, most</p> <p>11 shifts, was go into work slightly early and go to the</p> <p>12 gym, but I would get my radio in any case. Sometimes</p> <p>13 I would be asked over the radio to start my shift a bit</p> <p>14 earlier if they were short staffing or an incident</p> <p>15 occurred. So it's possible, on some shifts, it's</p> <p>16 between sort of 7.30 in the morning and 9.15 at night.</p> <p>17 Q. But we are talking about --</p> <p>18 A. But never in the evening.</p> <p>19 Q. We are talking about daytime?</p> <p>20 A. Never night-time, yes, sir.</p> <p>21 Q. You say shifts were allocated across a set rota, which</p> <p>22 you believe covered eight weeks?</p> <p>23 A. I believe so, sir, roughly.</p> <p>24 Q. You say one shift in the rota would finish at 6.15 in</p> <p>25 the evening?</p> <p style="text-align: center;">Page 76</p>

<p>1 A. Yes, sir.</p> <p>2 Q. Why would that be?</p> <p>3 A. Because we were activities staff and we -- our shifts</p> <p>4 started sort of half an hour later than everyone else's,</p> <p>5 occasionally we'd have to make up for those 30 minutes</p> <p>6 that we had off every morning, essentially. So I think</p> <p>7 that H shift was an additional shift to make sure we</p> <p>8 made up -- we were doing the same hours as all the other</p> <p>9 DCOs.</p> <p>10 Q. One of the questions you have been asked to consider is</p> <p>11 the G4S management structure, and there's a heading,</p> <p>12 a subheading, in your statement that begins at</p> <p>13 paragraph 115. The centre director. Who was that at</p> <p>14 the time?</p> <p>15 A. Ben Saunders, sir.</p> <p>16 Q. Did you have any personal dealings with him?</p> <p>17 A. Barely, sir. Barely saw him.</p> <p>18 Q. Did you see him during your training, for example?</p> <p>19 A. He did an introductory talk on our training, yes, but,</p> <p>20 apart from that, very little, sir.</p> <p>21 Q. So he was the centre director?</p> <p>22 A. Yes, sir.</p> <p>23 Q. Except, I think you note in the statement, for a period</p> <p>24 in 2016, when he was at Medway?</p> <p>25 A. Yes, in the aftermath of the Panorama programme into</p> <p style="text-align: center;">Page 77</p>	<p>1 <BBC000066>. Here is a diary of yours. We can see it</p> <p>2 is dated at the top 1 April 2017. It begins:</p> <p>3 "Reporting shift: 31/03/2017.</p> <p>4 "This morning I was in the library, this afternoon</p> <p>5 a sports officer and this evening in the IT room."</p> <p>6 This one goes on for 48 pages, but it is page 8</p> <p>7 I would like to ask you to look at. From time to time,</p> <p>8 Mr Tulley, you are going to have to decipher your own</p> <p>9 handwriting, which is rich coming from me, because I've</p> <p>10 got appalling handwriting.</p> <p>11 A. Yes, apologies.</p> <p>12 EPE OPERATOR: There is an issue again.</p> <p>13 MR ALTMAN: Are we back to good old WiFi, or is this</p> <p>14 something else?</p> <p>15 EPE OPERATOR: I don't know if it's TMX or --</p> <p>16 MR ALTMAN: Do you want to shut it down and try opening it</p> <p>17 again, perhaps?</p> <p>18 EPE OPERATOR: It's not shutting down either.</p> <p>19 MR ALTMAN: I mean the document, not the system.</p> <p>20 Maybe we can do it this way. You carry on and see</p> <p>21 if you can get it, if you wouldn't mind.</p> <p>22 Mr Tulley, to your right, you will see some hard</p> <p>23 copy bundles. If you find volume 1, and it might be</p> <p>24 easier -- I think, in future, chair, I'm going to ask</p> <p>25 for a box to come in here so Mr Tulley can pick them out</p> <p style="text-align: center;">Page 79</p>
<p>1 Medway, I think G4S sacked, or he resigned, the centre</p> <p>2 director at Medway, and so Ben Saunders was sent to</p> <p>3 Medway to oversee the centre whilst G4S found a new boss</p> <p>4 for the centre, I think.</p> <p>5 Q. Who was his deputy, certainly during the period we are</p> <p>6 interested in?</p> <p>7 A. Steve Skitt, sir.</p> <p>8 Q. Did you have much to do with him, or he with you?</p> <p>9 A. Very little, sir. He was investigating, at one point,</p> <p>10 a female member of staff who worked for Aramark, which</p> <p>11 was the catering company at Brook House. He suspected</p> <p>12 her of smuggling drugs in for detainees, and he asked me</p> <p>13 if I had any knowledge about this because she was seen</p> <p>14 in the library at some point, during which -- on a shift</p> <p>15 in which I was working, and he wondered if there may</p> <p>16 have been a drug pass of some sort in the library and</p> <p>17 whether I had seen the drug pass or had any knowledge of</p> <p>18 it.</p> <p>19 Q. As you mention it, we have, I think, your diary for that</p> <p>20 event. It should be B/11, or A/11, I think. This is</p> <p>21 for the first time, I think, so we can look at, at</p> <p>22 least, one example -- we will look at some others -- of</p> <p>23 your contemporaneous diaries. Can we have up on screen,</p> <p>24 please -- chair, it's -- let me check if it's A or B.</p> <p>25 It's A/11 for you -- <BBC000066>. No, it is a document.</p> <p style="text-align: center;">Page 78</p>	<p>1 because one is going to slide off that table.</p> <p>2 If you have volume 1, and go behind tab 11 in</p> <p>3 volume 1 --</p> <p>4 A. The tabs only go up to 8, sir.</p> <p>5 Q. You've got the wrong volume, then.</p> <p>6 A. I've got volume 1.</p> <p>7 Q. There should be volume 1 of 3, tabs A/1 to 13. Have we</p> <p>8 got an usher here who can help?</p> <p>9 THE CHAIR: It might be this one to your right on the top.</p> <p>10 A. Volume 2 of 3.</p> <p>11 MR ALTMAN: It should be volume 1 of 3.</p> <p>12 We have got it up on screen. We will sort out the</p> <p>13 bundles later. Don't worry. Put that back. Right.</p> <p>14 6 April 2017:</p> <p>15 "Today I did ACO duties in internal visits for the</p> <p>16 whole shift."</p> <p>17 A. Yes, sir.</p> <p>18 Q. Why were you doing ACO duties?</p> <p>19 A. I guess they were short of ACOs.</p> <p>20 Q. I'm going to try and --</p> <p>21 A. This could have been -- yeah, no, must have been. There</p> <p>22 was a time in which I was off work for six weeks with</p> <p>23 stress and then I came back on a phased return and was</p> <p>24 put on ACO duties, but I don't think this is around that</p> <p>25 time.</p> <p style="text-align: center;">Page 80</p>

1 Q. Tell us about that. I don't think we have heard about
2 that before. When were you off with stress?
3 **A. Sometime in which I was in correspondence with the BBC**
4 **but not working for them.**
5 Q. Right. So before 6 March?
6 **A. Yes.**
7 Q. After 12 January the year before?
8 **A. Yes. I think around September 2016.**
9 Q. What was the stress caused by? I mean, if it's got
10 nothing to do with this, I don't want to know, but if it
11 has anything to do with your evidence, tell us?
12 **A. There was a Ghanaian detainee who I found hanging from**
13 **the landing on I think it was D wing, and so we cut him**
14 **down, staff and detainees -- the detainees supported his**
15 **body, staff cut the ligature from around his neck,**
16 **pulled him up onto the landing. Having witnessed the**
17 **suicide attempt, I then had to go on an escort with him**
18 **to hospital, and I just struggled with -- I struggled**
19 **with -- I didn't -- I struggled -- having seen it, I was**
20 **struggling and went to the doctor to talk to her about**
21 **it and she signed me off with stress-related disorder**
22 **for six weeks.**
23 Q. Right.
24 **A. Then I returned on a phased return but I did ACO duties**
25 **for a couple of those weeks.**

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1 Q. I see. So that could explain why you were on ACO duties
2 on this day?
3 **A. It may do, but actually I think it was more**
4 **around September time 2016. Perhaps they were just**
5 **short staffed on this shift. It's hard to tell without**
6 **looking at the previous notes from previous days, but**
7 **that will tell us.**
8 Q. Let me read the note, and you correct me if I'm wrong
9 about anything:
10 "At 1530 I attended an interview with Steve Skitt,
11 the deputy director of Brook House. He interviewed me
12 about a time when ..."
13 You name someone there; is that right? Don't name
14 her, but you name a woman?
15 **A. Indeed.**
16 Q. "... entered the library (in which I was working) in
17 early February and took a bag from behind the counter of
18 the library where I was sitting."
19 **A. Yes, sir.**
20 Q. "It happened quickly while I was preoccupied with work.
21 She didn't really say hello. I apologised to Steve and
22 said I could not see what was in the bag."
23 **A. Yes, sir.**
24 Q. "I explained that ..."
25 These two words I struggle to read?

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1 **A. "I explained that staff corruption never crossed my mind**
2 **with Leah because she seemed kind and honest ..."**
3 Q. "... and I didn't believe it was in her to put her
4 colleagues at such risk. Steve understood this and said
5 that I personally was in no way being investigated. He
6 asked if I might be able to give any information that
7 might help them with their investigation. I explained
8 to Steve that the question was [respectful] ..."
9 Is that what it was?
10 **A. "... the question was unexpected", I think.**
11 Q. Oh, "unexpected":
12 "(I thought the interview would be about the
13 self-harm incident."
14 **A. "... about the self-harm incident. I was first at the**
15 **scene to following ..."**
16 Q. "... incorrect information being given to a detainee
17 regarding removal/transfer) ..."
18 **A. Yes, yes.**
19 Q. "... but that I did have a good ... relationship with
20 Leah so if given some time to reflect on her behaviour
21 and relationships with detainees I may be able to give
22 them a hand with their investigation."
23 **A. "Steve liked this comment and said he understood that it**
24 **was difficult to respond to the question when suddenly**
25 **thrown at me. He thanked me and said we could have an**

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1 **interview at a later date after I had reflected."**
2 Q. Okay. So that's really what you were telling us about,
3 that particular incident --
4 **A. Yes, sir.**
5 Q. -- regarding suspicions, and that was the only
6 interaction you had had with Mr Skitt, was it, or one
7 that you can recall well?
8 **A. Yes, sir, I think it's the only one, to be honest, other**
9 **than saying hello.**
10 Q. You say that they -- presumably, in your statement at
11 116, you say that, "They were supported by a team of
12 senior managers", whom you refer to as the senior
13 management team, or the SMT?
14 **A. Yes, sir.**
15 Q. And you believe that there were around six managers at
16 that level with specific areas of responsibility for the
17 wings, security and so on?
18 **A. I'd say at least six, sir, yes.**
19 Q. And the SMT member with responsibility for activities in
20 the period April to July 2017 was somebody you named to
21 us yesterday, Jules --
22 **A. Jules Williams, yes, sir.**
23 Q. Whom you would speak to once or twice a week. Was that
24 a man or a woman?
25 **A. A woman -- a man, sorry.**

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21 (Pages 81 to 84)

<p>1 Q. So you've got Ben Saunders, centre director, during the</p> <p>2 relevant period, Steve Skitt below him, deputy director?</p> <p>3 A. Yes, sir.</p> <p>4 Q. You have the SMT?</p> <p>5 A. Yes, sir.</p> <p>6 Q. Mr Saunders and Mr Skitt, are they members of the SMT or</p> <p>7 does the SMT sit below them?</p> <p>8 A. They sit below them, as far as I was aware. Perhaps --</p> <p>9 yes, they kind of headed up the SMT, I suppose.</p> <p>10 Q. You say beneath the SMT were the DCMs, the managers?</p> <p>11 A. Yes, sir.</p> <p>12 Q. And, "Unlike Ben Saunders, Steve Skitt and the rest of</p> <p>13 the SMT", which rather suggests that Ben Saunders and</p> <p>14 Mr Skitt, at least when you wrote this statement, you</p> <p>15 considered as part of the senior management team, which</p> <p>16 probably makes sense.</p> <p>17 A. Yes.</p> <p>18 Q. They wore suits?</p> <p>19 A. Yes, sir.</p> <p>20 Q. But the DCMs -- and this is important when we look at</p> <p>21 the footage, because the DCMs wore a white G4S shirt</p> <p>22 with a red G4S tie?</p> <p>23 A. Yes, sir.</p> <p>24 Q. So, if we are looking at the footage, any time we see</p> <p>25 a person wearing a G4S white shirt with a tie, that is</p> <p style="text-align: right;">Page 85</p>	<p>1 A. No, no, the residential part.</p> <p>2 Q. It was in the residential?</p> <p>3 A. Yes, but it was an area which was only accessible to</p> <p>4 detainees who had a visits appointment. So visitors</p> <p>5 would check in at the visits centre, the small building</p> <p>6 at the top right of the image we were looking at</p> <p>7 yesterday. They would be checked in by ACOs, they would</p> <p>8 be escorted -- they would be searched and escorted by</p> <p>9 ACOs through the first building where the gatehouse is</p> <p>10 and the sat desk is. They'd then go through a sterile</p> <p>11 area, which was kind of like just an outside area</p> <p>12 between the first and second building. They'd then pass</p> <p>13 through a number of electronic and lock-and-key doors</p> <p>14 whilst doing this, and then they'd be taken up to the</p> <p>15 visits corridor on the first floor of the second</p> <p>16 building where the detainees would reside. But this is</p> <p>17 all in areas out of bounds to detainees.</p> <p>18 They'd be checked in for their visit. They'd enter</p> <p>19 the hall from the visits corridor and the detainees</p> <p>20 would enter the hall from another door --</p> <p>21 Q. I see.</p> <p>22 A. -- which they did have access to if they were granted</p> <p>23 a visit.</p> <p>24 Q. Thank you. We are just going through the different DCM</p> <p>25 responsibilities. Then there was the DCM who managed</p> <p style="text-align: right;">Page 87</p>
<p>1 a manager?</p> <p>2 A. Yes, sir.</p> <p>3 Q. They managed, you say in this statement, the DCOs</p> <p>4 directly. They had specific areas of responsibility,</p> <p>5 which you have already told us in passing. They would</p> <p>6 be, for example, responsible for overseeing wings, and</p> <p>7 there would be another DCM responsible for overseeing</p> <p>8 detainee reception?</p> <p>9 A. Yes, sir.</p> <p>10 Q. One for overseeing visits, who would support and manage</p> <p>11 the DCOs working in the visits hall and the visits</p> <p>12 corridor. Remind us, so that we understand: you</p> <p>13 mentioned the visits area yesterday. Do you remember --</p> <p>14 if needs be, we can bring up the image again, or the</p> <p>15 images, but do you remember at the top right of</p> <p>16 the image was a little single-storey building in</p> <p>17 isolation?</p> <p>18 A. Yes.</p> <p>19 Q. Is that where visitors presented themselves?</p> <p>20 A. That's where visitors presented themselves, yes, sir.</p> <p>21 Q. Where was the visits hall?</p> <p>22 A. The visits hall was on the main -- the second building,</p> <p>23 the main building.</p> <p>24 Q. When you say the main building, not the residential part</p> <p>25 but the gatehouse?</p> <p style="text-align: right;">Page 86</p>	<p>1 activities, and you've mentioned Ramon Giraldo already?</p> <p>2 A. Yes, sir.</p> <p>3 Q. DCO uniforms. They were different, were they?</p> <p>4 A. Yes, sir.</p> <p>5 Q. What did the DCOs wear?</p> <p>6 A. Navy polos, navy G4S polos with --</p> <p>7 Q. Polo shirts? Short sleeved or long sleeved?</p> <p>8 A. Short sleeved. You'd wear navy G4S trousers. You'd be</p> <p>9 issued with a G4S cardigan and G4S jacket. It was all</p> <p>10 navy for DCOs.</p> <p>11 Q. Were they combat trousers or was there a choice of what</p> <p>12 you could wear?</p> <p>13 A. The trousers issued to you by G4S were just cotton G4S</p> <p>14 trousers. Some staff chose to wear their own combat</p> <p>15 trousers.</p> <p>16 Q. Fish knife?</p> <p>17 A. Fish knife was issued to us, yes, sir.</p> <p>18 Q. Key chain, belt, radio pouch and key pouch. I'm just</p> <p>19 reading from your statement.</p> <p>20 A. Yes, sir.</p> <p>21 Q. And ACOs wore the same as DCOs?</p> <p>22 A. Yes, sir.</p> <p>23 Q. So you can't distinguish between them?</p> <p>24 A. They weren't issued with a fish knife. That would be</p> <p>25 the only thing.</p> <p style="text-align: right;">Page 88</p>

<p>1 Q. Handy. We have heard about Oscars, Oscar One and Two.</p> <p>2 Tell us about them? We haven't heard yet but we have</p> <p>3 certainly --</p> <p>4 A. To the best of my recollection, an Oscar was a DCM but</p> <p>5 Oscar One was kind of the -- if you were allocated as</p> <p>6 Oscar One on any given shift, you were kind of the most</p> <p>7 senior DCM. You would respond to instances of self-harm</p> <p>8 or first responses. I think, you know, sort of, you had</p> <p>9 the most control before the senior management team.</p> <p>10 I think you may have been responsible for deciding which</p> <p>11 staff were posted where.</p> <p>12 Q. Regarded as the more senior DCM on duty on that shift?</p> <p>13 A. Yes, the guy in charge. Particularly on a weekend, the</p> <p>14 Oscar One was of significant importance because the SMT</p> <p>15 weren't around on weekends. Maybe one member of the SMT</p> <p>16 might have been. So the Oscar One would be sort of</p> <p>17 running the show.</p> <p>18 Q. Who was the Oscar Two?</p> <p>19 A. I'm not sure if it was the Oscar One's second-in-command</p> <p>20 or not. I don't know if they had different areas of</p> <p>21 responsibility. I don't remember.</p> <p>22 Q. Did Oscar Two have anything to do with detainee</p> <p>23 reception, perhaps, or do you not know?</p> <p>24 A. Perhaps, perhaps, but I'm not quite sure, sir.</p> <p>25 Q. All right. We will find out another way.</p> <p style="text-align: center;">Page 89</p>	<p>1 terms of overall culture difference?</p> <p>2 A. Tinsley House was a much more humane and appropriate</p> <p>3 environment in which to detain someone, I felt. It</p> <p>4 was -- detainees weren't locked in cells, they had rooms</p> <p>5 which they could leave whenever they wanted. There was</p> <p>6 more space. Amongst staff, there was a much less toxic</p> <p>7 atmosphere. Detainees could move around more freely,</p> <p>8 there was more staff to more detainees. There was just</p> <p>9 a nicer -- it was a nicer facility which didn't resemble</p> <p>10 a prison, certainly not a category B prison, perhaps</p> <p>11 category D, although I'm not an expert on that.</p> <p>12 I mean, still, the detainees there were being</p> <p>13 detained indefinitely, so that would have remained an</p> <p>14 issue, but in terms of the conditions in which they were</p> <p>15 detained, it was a much more humane environment.</p> <p>16 THE CHAIR: Are you aware if there were the same staff</p> <p>17 working on the two different sites, Tinsley and</p> <p>18 Brook House?</p> <p>19 A. There was different staff for Tinsley and different</p> <p>20 staff for Brook House. Very occasionally, there would</p> <p>21 be crossover. I remember when there were sort of --</p> <p>22 when Brook House was kind of -- there was a time of real</p> <p>23 short staffing and the new beds had been added to the</p> <p>24 ground floors of B, C and D wing -- A, C and D wing, and</p> <p>25 there was, you know, as was often the case, not enough</p> <p style="text-align: center;">Page 91</p>
<p>1 A. Sorry.</p> <p>2 Q. Although we have had an extended break, I see the time</p> <p>3 and I think the chair wants to ask you a few questions</p> <p>4 before we break for lunch.</p> <p>5 A. Yes, sir.</p> <p>6 THE CHAIR: Thank you, Mr Altman.</p> <p>7 My apologies. They are not all necessarily</p> <p>8 connected. It's just to pick up on a couple of things</p> <p>9 from earlier as well?</p> <p>10 A. No problem, chair.</p> <p>11 THE CHAIR: In this conversation just now with the questions</p> <p>12 Mr Altman was asking about, you referred to the SMT.</p> <p>13 Were there any groups of staff or individual staff who</p> <p>14 sat between those senior managers who generally wore</p> <p>15 their own clothes rather than G4S uniforms and then DCOs</p> <p>16 and DCMs? Was there any kind of middle management</p> <p>17 between those two groups?</p> <p>18 A. Between?</p> <p>19 THE CHAIR: Between the SMT and then the DCOs and DCMs?</p> <p>20 A. No, chair, there was nothing between them.</p> <p>21 THE CHAIR: Thank you. You have also referenced a short</p> <p>22 space of time where you worked at Tinsley House.</p> <p>23 A. Yes, chair.</p> <p>24 THE CHAIR: Do you have any observations about the</p> <p>25 comparison between Tinsley House and Brook House in</p> <p style="text-align: center;">Page 90</p>	<p>1 staff to cater to the needs of detainees, so I think</p> <p>2 some Tinsley staff were sort of shipped in to help.</p> <p>3 I think Tinsley House also underwent some refurbishment</p> <p>4 as well, so there was a time in which Tinsley staff were</p> <p>5 at Brook House. But, on the whole, you mainly had</p> <p>6 Brook House staff and Tinsley House staff generally.</p> <p>7 THE CHAIR: Then my final question: you mentioned that you</p> <p>8 were one of the first people who responded to an</p> <p>9 incident of what sounds like fairly serious self-harm.</p> <p>10 A. Yes, chair.</p> <p>11 THE CHAIR: Do you remember whether there was any debrief of</p> <p>12 any sort conducted after that incident, either termed</p> <p>13 a hot debrief, which would have happened very quickly</p> <p>14 after the incident, or a cold debrief, some days or</p> <p>15 weeks following the incident?</p> <p>16 A. Not that I can remember, chair, I'm sorry.</p> <p>17 THE CHAIR: Do you remember ever having a debrief for any</p> <p>18 other adverse incident, whether that was a use of force</p> <p>19 or a self-harm incident?</p> <p>20 A. Debriefs did take place. I can't remember them.</p> <p>21 I can't remember any. But I don't doubt that they did</p> <p>22 happen, chair.</p> <p>23 THE CHAIR: Thank you very much.</p> <p>24 MR ALTMAN: Chair, we are a little off 1.00 pm, but perhaps</p> <p>25 that's a good time, because I'm coming to a new topic,</p> <p style="text-align: center;">Page 92</p>

<p>1 so can I suggest, chair, if you agree, that we return at</p> <p>2 2.00 pm?</p> <p>3 THE CHAIR: Thank you very much. I'll see you at 2.00 pm.</p> <p>4 (12.55 pm)</p> <p>5 (The short adjournment)</p> <p>6 (2.00 pm)</p> <p>7 MR ALTMAN: Mr Tulley, before we move on, before we broke</p> <p>8 you were telling us about the incident which led to you</p> <p>9 having some time off. Can we just put up on screen,</p> <p>10 please, if possible, <BBC000058>. I'm grateful to</p> <p>11 Mr Armstrong for this reference. Chair, it is section</p> <p>12 A/3 in your bundle.</p> <p>13 THE CHAIR: Thank you.</p> <p>14 MR ALTMAN: Then if we go to page 13, do you see on the left</p> <p>15 page, "Reporting shift: 20/08/2016":</p> <p>16 "I was rostered to D wing as a first responding</p> <p>17 officer for this shift.</p> <p>18 "At approximately 0830 ..."</p> <p>19 So that's the morning:</p> <p>20 "... a first response was called to C wing first</p> <p>21 floor. Upon arrival to the wing, I ..."</p> <p>22 That's what word?</p> <p>23 A. "Rushed", sir.</p> <p>24 Q. "... rushed up the wing's stairs. As I got to the first</p> <p>25 floor, I looked up and saw ..."</p> <p style="text-align: center;">Page 93</p>	<p>1 Q. "... when D4940 became responsive and was taken to</p> <p>2 E wing's constant supervision room.</p> <p>3 "After medical assessment, the doctor advised that</p> <p>4 [he] be taken to hospital because he could not speak and</p> <p>5 his breathing was restricted. An ambulance came to take</p> <p>6 [him] to East Surrey Hospital. I was chosen to be</p> <p>7 the ..."?</p> <p>8 A. "Handcuff officer".</p> <p>9 Q. "... handcuff officer on the team of three DCO escorts</p> <p>10 accompanying him."</p> <p>11 That's all I need to read. That's just to cover off</p> <p>12 what you told us earlier. That's the incident and we</p> <p>13 can date it by virtue of the note that you made.</p> <p>14 Back, please, to your witness statement, at</p> <p>15 paragraph 119. You were asked to turn your attention in</p> <p>16 the request for the witness statement the inquiry made</p> <p>17 to you about the oversight organisations -- the</p> <p>18 Home Office, HMIP, the inspectorate, and the IMB and</p> <p>19 their presence at Brook House.</p> <p>20 First of all, the Home Office. Where did they work,</p> <p>21 the Home Office staff who were at Brook House?</p> <p>22 A. Yes, sir. The Home Office staff at Brook House worked</p> <p>23 in the second building, the main building in which</p> <p>24 detainees resided. Their offices weren't in an area</p> <p>25 which was accessible to detainees. But they worked in</p> <p style="text-align: center;">Page 95</p>
<p>1 A. "The feet".</p> <p>2 Q. "... the feet of a detainee from Ghana, named D4940. He</p> <p>3 had tied a noose to the stair banister ..."</p> <p>4 A. Yes, sir.</p> <p>5 Q. "... tied it around his neck and jumped ..." -- "on" or</p> <p>6 "off"?</p> <p>7 A. "Off the stairs".</p> <p>8 Q. "... off the stairs on the second landing. Detainees</p> <p>9 quickly supported his body weight and pulled him back</p> <p>10 over onto the landing, saving his life. The ligature</p> <p>11 was then cut from his neck with a fish knife ..."</p> <p>12 What's that next word, "by an officer"?</p> <p>13 A. Yes, sir.</p> <p>14 Q. "D4940 was unresponsive when the medical team arrived.</p> <p>15 Upon their arrival, the attending officers were ordered</p> <p>16 to lock down the wing. When we tried to do so, the</p> <p>17 majority of detainees", something?</p> <p>18 A. "Refused".</p> <p>19 Q. "... refused and became aggressive. They ... shouted</p> <p>20 abuse at officers. They felt aggrieved because they had</p> <p>21 possibly saved someone's life but then were being locked</p> <p>22 up. The attempt to lock down the wing ended after about</p> <p>23 ten minutes ..."</p> <p>24 What's the word before the label?</p> <p>25 A. "When", sir.</p> <p style="text-align: center;">Page 94</p>	<p>1 that building. Second floor, I think.</p> <p>2 Q. Would that be the top floor, then?</p> <p>3 A. Yes, sir. Although they did work in the visits corridor</p> <p>4 as well. I think occasionally they'd be required to</p> <p>5 give detainees updates on their case. Although my</p> <p>6 insight into the workings of the visits corridor was</p> <p>7 limited because I rarely worked there.</p> <p>8 Q. In terms of numbers, are you able to help with, on</p> <p>9 average, how many Home Office staff there would be at</p> <p>10 Brook House on any given day?</p> <p>11 A. I'm not sure, sir, I'm sorry.</p> <p>12 Q. Weekends? Any idea?</p> <p>13 A. No idea, sir.</p> <p>14 Q. Were they visible?</p> <p>15 A. Barely.</p> <p>16 Q. So far as you remember, in the two and a half years you</p> <p>17 were there, did you have any interaction or involvement</p> <p>18 with any Home Office staff?</p> <p>19 A. No, sir.</p> <p>20 Q. Can you name any of them?</p> <p>21 A. No, sir.</p> <p>22 Q. Moving on to Her Majesty's Inspector of Prisons, HMIP,</p> <p>23 during the course of your employment at Brook House, did</p> <p>24 you ever see any inspectors or any members of</p> <p>25 the inspectorate --</p> <p style="text-align: center;">Page 96</p>

<p>1 A. Yes, sir.</p> <p>2 Q. -- within Brook House? And was that during an</p> <p>3 inspection?</p> <p>4 A. I believe it was, sir, yes.</p> <p>5 Q. 2016?</p> <p>6 A. Probably, sir.</p> <p>7 Q. Did you talk to anybody who was there during the</p> <p>8 inspection?</p> <p>9 A. I think I spoke to one inspector who visited me in the</p> <p>10 IT suite, which is where I was working on this</p> <p>11 particular day, and he asked me about how accessible the</p> <p>12 computers were to detainees and what sort of websites</p> <p>13 they could access and how it works. Besides that, I had</p> <p>14 little interaction with Her Majesty's Inspector of</p> <p>15 Prisons, sir.</p> <p>16 Q. While we are thinking about them, were they ever</p> <p>17 mentioned to you as an oversight body during the course</p> <p>18 of your training? Did you know who they were when they</p> <p>19 pitched up, or had you heard of them before? Did you</p> <p>20 hear about them during the course of your employment?</p> <p>21 When was HMIP something you first became alive to?</p> <p>22 A. We knew about the -- the interesting thing is, we knew</p> <p>23 about the unannounced inspection, which was strange,</p> <p>24 because an unannounced inspection implies that the</p> <p>25 inspectors turn up unannounced and, therefore, would get</p> <p style="text-align: center;">Page 97</p>	<p>1 A. Yes, sir.</p> <p>2 Q. Let me ask you, please, to look at a document that we</p> <p>3 have been asked to place before you.</p> <p>4 A. Just on HMIP, sir, I didn't really -- I didn't kind of</p> <p>5 know that they were a body I could go to to raise</p> <p>6 concerns. I mean, as far as I was aware, they were just</p> <p>7 inspecting the -- sort of the conditions in Brook House,</p> <p>8 in terms of what was available to detainees, what</p> <p>9 recreational facilities they could access. I didn't</p> <p>10 know there was sort of a -- the sort of physical</p> <p>11 treatment of detainees was within their remit. I mean,</p> <p>12 I didn't know much about HMIP, to be honest. It just</p> <p>13 didn't occur to me, sir.</p> <p>14 Q. I suppose, if one was being critical, you could have</p> <p>15 found out --</p> <p>16 A. Yes, sir.</p> <p>17 Q. -- in your own time, or even on company time, by going</p> <p>18 on a computer, but it didn't occur?</p> <p>19 A. No, sir.</p> <p>20 THE CHAIR: Mr Altman, excuse the interruption, but can</p> <p>21 I just ask a question that I think is probably related?</p> <p>22 Do you remember how you found out about the unannounced</p> <p>23 inspection? Can you remember how you found out about</p> <p>24 the unannounced inspection taking place? Was it amongst</p> <p>25 other staff.</p> <p style="text-align: center;">Page 99</p>
<p>1 an accurate reflection of what life inside the centre is</p> <p>2 like. But we knew it was coming, I think, in the --</p> <p>3 maybe the day before or a couple of days before. So</p> <p>4 I had heard of them before the inspection. I think</p> <p>5 I probably knew who they were when I was employed at --</p> <p>6 it was probably likely that I was told about them in my</p> <p>7 training, although I don't remember being told about</p> <p>8 them.</p> <p>9 Q. Did you think that the inspectorate was somebody to whom</p> <p>10 you could report concerns?</p> <p>11 A. No, sir. Perhaps if I was asked about it, maybe.</p> <p>12 Q. While you were having this conversation, I think you</p> <p>13 said in the IT suite with this inspector, or one of</p> <p>14 the members of the inspectorate who turned up for the</p> <p>15 inspection, we think in 2016, was it possible for you to</p> <p>16 have taken that person aside and said, "Look, you know,</p> <p>17 I've got a few things to tell you"? Did that enter your</p> <p>18 head?</p> <p>19 A. It never entered my head, sir, no.</p> <p>20 Q. Because?</p> <p>21 A. I was being asked specific questions about the IT suite.</p> <p>22 It never occurred to me, sir.</p> <p>23 Q. The IMB. Now, you say in your statement at</p> <p>24 paragraph 121 you saw members of the IMB operating at</p> <p>25 least every two weeks?</p> <p style="text-align: center;">Page 98</p>	<p>1 A. Ramon knew, our line manager, Ramon Giraldo knew about</p> <p>2 it. So I imagine he was advised by one of his</p> <p>3 superiors.</p> <p>4 THE CHAIR: So was it as part of a sort of formal briefing</p> <p>5 for staff or was it more an informal comment that you</p> <p>6 were made aware of; do you remember?</p> <p>7 A. Just told in the activities office, chair.</p> <p>8 THE CHAIR: Thank you.</p> <p>9 MR ALTMAN: While the chair has asked that good question,</p> <p>10 which I should have asked, how long in advance of</p> <p>11 the so-called unannounced visit was Ramon telling you</p> <p>12 that the inspectorate was turning up?</p> <p>13 A. A couple of days, at the most. Maybe a day, sir.</p> <p>14 Q. Were you aware, one way or the other, of whether people</p> <p>15 were preparing themselves for the visit? In other</p> <p>16 words, making sure everything was in apple pie order?</p> <p>17 A. Well, I recall that -- I recall staffing was at an</p> <p>18 adequate level. We had a sports officer as well as</p> <p>19 a library officer and an activities officer. I believe,</p> <p>20 although I don't know for a fact -- perhaps G4S can help</p> <p>21 you with this -- that staffing on this occasion was</p> <p>22 adequate. So I believe that --</p> <p>23 Q. Are you saying that -- because it was a question I asked</p> <p>24 you yesterday, about staffing, whether it was through --</p> <p>25 you know, the problems with staffing you mentioned to us</p> <p style="text-align: center;">Page 100</p>

<p>1 persisted throughout the whole period you worked and my</p> <p>2 recollection of your answer was it was?</p> <p>3 A. Yes, sir.</p> <p>4 Q. Are you saying that staff were specially brought in, in</p> <p>5 order to present a picture of Brook House, which wasn't</p> <p>6 accurate, for the visit?</p> <p>7 A. That's what I'm suggesting, sir, yes.</p> <p>8 Q. Was anything else done in order to present a picture of</p> <p>9 Brook House for the purposes of the inspection?</p> <p>10 A. It's hard to remember, sir, but we were just focused on</p> <p>11 the activities department, making sure everything was in</p> <p>12 good condition, that posters were up around sort of</p> <p>13 advertising that sports could be played on certain</p> <p>14 corridors on certain days and made sure that all the</p> <p>15 computers were working, that there were enough bail</p> <p>16 applications and section 4 applications printed off</p> <p>17 and --</p> <p>18 Q. A section 4 application?</p> <p>19 A. I struggle to remember, actually, what a section 4</p> <p>20 application is, but it's one of the applications which</p> <p>21 were available to detainees. There was a whole range of</p> <p>22 detainees -- a whole range of applications which were</p> <p>23 available to detainees in the library, or should have</p> <p>24 been available. We made sure that enough were printed</p> <p>25 out and that books were in good order and courtyards</p> <p style="text-align: center;">Page 101</p>	<p>1 10 April, three statutory visits, on the 11th, the 13th</p> <p>2 and the 15th.</p> <p>3 On the 17th, apart from board meetings, there was</p> <p>4 one statutory visit, on 19 April. And, just by way of</p> <p>5 example, on 24 April, if we can scroll down, please,</p> <p>6 a little, we can see two statutory visits, on the 26th</p> <p>7 and the 29th, and so on. I'm not going to go through</p> <p>8 the whole document. But it just simply reflects that</p> <p>9 perhaps your idea of the number of visits that were</p> <p>10 made, or at least statutory visits that were made, by</p> <p>11 the IMB may be wrong either because you didn't see them,</p> <p>12 weren't aware that they were there or have</p> <p>13 misremembered?</p> <p>14 A. Yes. I mean, it's -- I was working an average of four</p> <p>15 days a week. Perhaps, on some of the days that I wasn't</p> <p>16 in, they arrived. May have been working in other parts</p> <p>17 of the detention centre, when I was working on another</p> <p>18 unit on which they weren't. I saw them a couple of</p> <p>19 times every fortnight, a couple of times a week,</p> <p>20 perhaps, but I can't really remember sort of seeing them</p> <p>21 as regularly as is suggested in this document, but</p> <p>22 I don't dispute that this is true.</p> <p>23 Q. Let me ask you the same question I have asked you about</p> <p>24 others. The IMB, whenever you did see them, did you</p> <p>25 have any interaction or involvement with them?</p> <p style="text-align: center;">Page 103</p>
<p>1 were in good condition, that kind of thing.</p> <p>2 Q. So coming back, thank you, to the IMB, you said in your</p> <p>3 statement you saw members of the IMB operating at least</p> <p>4 every two weeks. I just want to show you something to</p> <p>5 which G4S would like attention drawn under a question</p> <p>6 that they have asked and which the chair agrees with.</p> <p>7 Chair, it's at your bundle 108, probably the last</p> <p>8 document, I think, in your bundles. If we can put up on</p> <p>9 screen, please, the following document, <IMB000029>. If</p> <p>10 we can just zoom in to the top half. I'm not going to</p> <p>11 take very long over this, Mr Tulley, but you can see it</p> <p>12 is headed "Date of visits to Brook House IRC by board</p> <p>13 members of the Independent Monitoring Board for</p> <p>14 Brook House (1 April-31 August 2017)". So it's in our</p> <p>15 period. The point which is made from looking at this</p> <p>16 document is that, in fact, if -- assuming it's accurate</p> <p>17 and accurately represents the visits, the statutory</p> <p>18 visits, that were made, more typically the IMB were</p> <p>19 there about twice weekly rather than every two weeks.</p> <p>20 Is that something that you will dispute?</p> <p>21 A. It's not something I'd dispute, sir, no. It's just that</p> <p>22 I don't recall seeing them that regularly.</p> <p>23 Q. So, for example, if we look at the week commencing</p> <p>24 3 April, we can see there were two statutory visits, on</p> <p>25 the Monday and Friday of that week. The next week,</p> <p style="text-align: center;">Page 102</p>	<p>1 A. Very little, sir.</p> <p>2 Q. Did you ever have the chance, though, if you really</p> <p>3 wanted to, to whisper in their ear about your complaints</p> <p>4 about what was going on at Brook House? You could have</p> <p>5 done it?</p> <p>6 A. Technically, yes, sir. But, similarly with HMIP,</p> <p>7 it's -- you know, when you're witnessing abuse in cells,</p> <p>8 which is where I bore witness to most abuse, there are</p> <p>9 no cameras in these cells, so whose word is it going to</p> <p>10 be that is believed -- mine or that of the managers?</p> <p>11 What would complaining to HMIP or the IMB actually</p> <p>12 achieve? I had no evidence of the abuse. I had no</p> <p>13 officers who were willing to sort of co-operate with me,</p> <p>14 either because I didn't know of any officers who would</p> <p>15 complain about abuse with me or because the few officers</p> <p>16 I did have in mind were not present in -- during</p> <p>17 instances of abuse.</p> <p>18 So it wasn't like I was going to say to the IMB or</p> <p>19 HMIP, "I witnessed this manager mock and humiliate</p> <p>20 a detainee who was naked and suicidal in his cell and</p> <p>21 was covering himself in his faeces", and then they were</p> <p>22 going to put that to the manager and the manager was</p> <p>23 going to go, "Yep. That was me". Of course they</p> <p>24 weren't. So how was I going to prove any of this to the</p> <p>25 IMB or HMIP?</p> <p style="text-align: center;">Page 104</p>

<p>1 Q. While we think about the IMB, what was their reputation 2 around the place? What did other officers think about 3 the IMB? 4 A. They were seen as grasses, snitches, people didn't trust 5 the IMB. 6 Q. If you had whispered in their ear and that had led to 7 difficulties for others and it had been discovered that 8 you had complained to them and it came back to you, what 9 would your life have been look at Brook House? 10 A. Similar to that of other G4S staff who complained about 11 mistreatment -- marginalisation, bullying, intimidation. 12 Q. Thank you, we can take that down. 13 I want you to give us a little help, please, about 14 the layout of Brook House. We have got a plan, but it's 15 fairly rudimentary and may not help overmuch. So 16 I wonder if we can put back up those two entries we have 17 seen several times already, <INQ000062> and <INQ000063>. 18 I want to ask you some more questions just to sketch out 19 the place for us more than you have already. We have 20 got those two images again. You have told us about that 21 building in the top left image which stands alone. What 22 was the term for that building? 23 A. The top right, sir? 24 Q. Yes, that single building? 25 A. The visits centre.</p> <p style="text-align: center;">Page 105</p>	<p>1 using either image. Let's just remind ourselves. 2 E wing is the green one? 3 A. Well, yes, E wing is at the bottom of the green one. 4 Q. So that's the ground floor? 5 A. The ground floor, yes. 6 Q. What was above E wing? 7 A. B wing, sir. 8 Q. So typically, the flooring or the number of floors in 9 each wing, or in the way the building is constructed -- 10 three floors? 11 A. Each wing, yes, usually. 12 Q. Each wing has three. But E wing on the right occupies 13 only the ground floor -- 14 A. Yes, sir. 15 Q. -- which includes the CSU that you told us about 16 yesterday? 17 A. Yes. 18 Q. Above the E wing is B wing, which was designed to be the 19 induction unit. How many floors does B wing have? 20 A. Two: a ground floor and a first floor. I think the 21 ground floor is actually on the first floor and the 22 first floor is on the second floor because it's above 23 E wing. 24 Q. We should imagine that part of that right-hand side of 25 the H as we are looking at it, by which I mean, if you</p> <p style="text-align: center;">Page 107</p>
<p>1 Q. So that's the visits centre. Then we have the 2 capital H, which reflects the main building, or the 3 second building, as you have referred to it from time to 4 time, and although it is difficult to tell, the building 5 right at the top, if we are looking at the left-hand 6 image, that's the gatehouse building which you have been 7 talking about. That building is actually separated from 8 the H-shaped building. In other words, that's that -- 9 what did you call it? 10 A. Sterile area, sir. 11 Q. Sterile area. One should imagine that if they are 12 leaving that first building and going to the residential 13 part of the detention centre, then you would have to 14 cross that yard in order to get to the one or possibly 15 two doors or gates that go into that building? 16 A. Correct, sir. 17 Q. So it's not very well represented there. If we look at 18 the image on the right, we might just about make out 19 that gap where that red splodge is on the wall of 20 the first building? 21 A. Yes, sir. 22 Q. So there's a gap and an outside area where you step from 23 one building to the next? 24 A. Yes, sir. 25 Q. Let's see if we can work our way around the building</p> <p style="text-align: center;">Page 106</p>	<p>1 dissected where you've got the centre part of 2 the building that goes across, the quarter that we are 3 looking at in the bottom right is, ground floor E wing 4 around the upper two floors are B wing? 5 A. Yes, sir. 6 Q. Which makes up the three floors of that quarter, if you 7 like, of the H? 8 A. Yes, sir. 9 Q. So far, so good. If we were to go up through E or B, as 10 the case may be, what is the wing closest to the 11 visitors' reception area? 12 A. That's A wing, sir. 13 Q. That's A. So that's red? 14 A. Yes, sir. 15 Q. And that's A wing. That's got how many floors? 16 A. Three, sir. 17 Q. So that's got three? 18 A. Yes, sir. 19 Q. Moving to the other side, the left-hand part of the H, 20 let's start at the part closest to us, the orange. 21 Which wing is that? 22 A. D wing, sir, delta wing. 23 Q. How many floors is delta or D wing? 24 A. Three, sir. 25 Q. So that's got three, which leaves one part of that</p> <p style="text-align: center;">Page 108</p>

<p>1 a left-hand side of the H closest to the cars at the 2 front. Colour blue? 3 A. Yes, sir. 4 Q. That's got to be C wing? 5 A. Indeed. 6 Q. Also three floors? 7 A. Yes. 8 Q. We will come to some of the internal fixtures and 9 fittings in a bit, but looking at the image on the left 10 and a little of the image on the right, we can see the 11 outside courtyards? 12 A. Yes, sir. 13 Q. You pointed out yesterday the one next to D wing with 14 the awning above it. 15 A. Yes, sir. 16 Q. Close to where the library was/is? 17 A. Correct. 18 Q. With some tables. Is that Astro Turfed out there? 19 A. Or something similar, yes. 20 Q. We can see just on the perimeter that there is quite 21 high fencing? 22 A. Yes, sir. 23 Q. And barbed wire or razor wire? 24 A. Razor wire. 25 Q. And the same for all of the courtyards?</p> <p style="text-align: center;">Page 109</p>	<p>1 two long H -- you know, the parts of the left-hand and 2 the right-hand parts of the capital H. Just tell us in 3 a couple of sentences, apart from the library in that 4 building, with the windows, what else is in those three 5 storeys? 6 A. Looking at the D wing courtyard? 7 Q. Well, no -- well, yes. I just want to know generally, 8 the bit that -- the strut bit that joins the two long 9 arms of the H, what generally is in that area? 10 A. If you look at the -- looking at the left image, if you 11 look at the courtyard on the bottom right, on the ground 12 floor you can see the two windows going outside to the 13 courtyard. That was an IT suite. Above that, on the 14 second floor, there was another IT suite. Above that, 15 on the third floor, was a mosque and a multifaith room. 16 Going over to the left-hand side of the building, where 17 you have the sort of garden-like D wing courtyard with 18 chairs and fake grass, as we say, on the ground floor 19 there's a library. Above that, on the first floor, 20 there's an arts and crafts room and a classroom. And 21 above that is a sort of church-type room and a music 22 room. 23 If you go sort of along the corridor into the centre 24 of the -- very, very centre of the H, there you will 25 find the detainees' shop, the gym, doors leading to the</p> <p style="text-align: center;">Page 111</p>
<p>1 A. Yes, sir. 2 Q. And the one on the right, difficult to make out, does it 3 have -- don't let me put words in your mouth, but the 4 way I'm looking at it, has it got some form of sports 5 surface? 6 A. Yes, sir. It was a basketball court, but it looks like 7 this picture has been taken after a detainee managed to 8 evade removal by climbing the basketball hoop and 9 sitting up there. So this was -- it was taken away, 10 basically, but the markings of the basketball court 11 remain there. 12 Q. Although we can't see them very well, there are two 13 other courtyards by the other wings. Do they have 14 similar markings? 15 A. Yes, sir. The C wing courtyard had -- 16 Q. Remind us, C wing is on which side? 17 A. The left, sir, where you can see a tiny shade of blue on 18 the right-hand image. This had football markings and 19 two football goals. It was like a gravel courtyard. 20 The one on the opposite side, on the right, coming out 21 of A wing, was another gravel courtyard, on which 22 detainees would play cricket. 23 Q. So those are the residential wings. We will come back 24 to, as I say, some of the internal fittings and fixtures 25 in a bit. We have the bit that struts -- that joins the</p> <p style="text-align: center;">Page 110</p>	<p>1 visits corridor, which go in the direction sort of away 2 from the two courtyards that we can see well, so towards 3 the perimeter road, and they lead to small meeting rooms 4 and the visits hall. 5 Q. So, finally, as far as the H shape, of course, it's not 6 exactly an H shape, not least because there's that great 7 big fat area in the middle that goes from back to front 8 as far as the image is concerned. What is in that part 9 of the building closest to us just to the right of 10 the awning? 11 A. The kitchen, sir. The kitchen and the staff room, sir. 12 Q. How many staff rooms were there? 13 A. On the main unit, I remember there being two staff 14 rooms. 15 Q. On different floors? 16 A. Yes -- one on the very top floor, on the third floor, 17 and one on the ground floor, next to the kitchen. 18 Q. And the building which -- or that part of the building 19 which is the other side of that joining area where the 20 gym and the multifaith rooms, and so on, are, which is 21 closest to the first building. 22 A. Yes, sir. 23 Q. What's that? 24 A. So the Home Office would have their offices on the third 25 floor, I believe, maybe the second floor --</p> <p style="text-align: center;">Page 112</p>

1 Q. Yes.

2 **A. Well, actually, the second floor is the third floor.**

3 **You've got the ground, the first and the second. On the**

4 **second floor is where I think you'd have the Home Office**

5 **offices. Offices for the senior management team would**

6 **also be on this second floor. Ben Saunders and**

7 **Steve Skitt also had their offices on the second floor.**

8 Q. Okay.

9 **A. And HR, sir.**

10 Q. And HR. Now, you mentioned, a little earlier, radio

11 announcements. Did they come from a control area? We

12 don't need to know where that is, but did that come from

13 a control area?

14 **A. Radio announcements on the whole came from the control**

15 **room, unless they were regarding a visit for a detainee.**

16 **That would be made from the visits corridor.**

17 Q. I see. If you were a detained man, let's say, on --

18 forget E wing for the moment, but if you were a detained

19 man on A wing, were you able to move freely from A wing

20 to another wing?

21 **A. If you were a detained man? No, sir.**

22 Q. So you were stuck on A wing come what may?

23 **A. During association period, you could leave, go to the**

24 **courtyard, but you couldn't go to other wings, sir, no.**

25 Q. So if you were on A wing, you were limited to the common

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1 parts of A wing and you were limited to the courtyard

2 which connected with A wing, but that's as far as you

3 could go, unless -- what if you were going to the gym,

4 for example?

5 **A. Yes, you could go to the gym, sir. You could go to**

6 **D wing courtyard, you could go to C wing courtyard.**

7 Q. I see.

8 **A. You couldn't go on any of the other wings but you could**

9 **go to any other association area, be it courtyards, the**

10 **gym, the library, the IT room.**

11 Q. The one thing you couldn't go is to the accommodation

12 parts of the other wings?

13 **A. Yes, sir.**

14 Q. Is that perhaps how we should see it?

15 **A. Yes, sir.**

16 Q. How did detained men move from wing to wing? Did they

17 have any passes, when you were there?

18 **A. So to gain access to your wing, you were meant to show**

19 **a wing officer your pass and then he would allow you**

20 **onto the wing. If you tried to get access to a wing**

21 **that you didn't reside on, then the officer should say,**

22 **"Show me your pass". The detainee would show him his**

23 **pass. It wouldn't have D wing, C wing or whatever wing**

24 **they were meant to be on on it, so they would be denied**

25 **access to the wing. That was meant to happen.**

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1 Q. When you say "meant to happen", was it (overspeaking) --

2 **A. Well, often -- that often did happen, but it often**

3 **didn't happen as well.**

4 Q. Do we understand there was at all times an officer

5 manning the doors onto the accommodation parts of a wing

6 to stop detained men, whose wing it was not, entering?

7 **A. Well, given the lack of staff on the wing, that wasn't**

8 **possible. So staff would have to juggle their other**

9 **responsibilities with trying to man the door and make**

10 **sure people weren't coming onto the wing who shouldn't**

11 **be there.**

12 Q. So what happened? Are you saying that officers who were

13 supposed to man the doors weren't manning the doors?

14 **A. Well, the door would be locked. So they didn't have to**

15 **physically have someone at the door at all times.**

16 Q. Right.

17 **A. But, obviously, detainees would want to leave their wing**

18 **to access the recreational areas. So either they were**

19 **left waiting to leave or someone would have to man the**

20 **door. But you couldn't have someone manning the door at**

21 **all times because of all the other responsibilities. So**

22 **often there were kind of large queues that would form**

23 **from detainees trying to leave the wing or come back**

24 **onto the wing.**

25 Q. Did that cause frustration?

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1 **A. Yes, sir.**

2 Q. In what way? How did it manifest itself?

3 **A. Detainees would become very upset and it would be a real**

4 **source of tension between wing officers and detainees.**

5 **I mean, staff were trying to juggle all the other**

6 **responsibilities that they had. Obviously detainees**

7 **didn't care for that. They wanted to get to the library**

8 **or the IT room to work on their cases or go to the gym**

9 **or go to the courtyards.**

10 Q. And the passes they had, were they photo passes or did

11 it simply indicate which wing they were on?

12 **A. They were laminated passes with a picture of the -- sort**

13 **of like a picture the size of, like, a driving licence**

14 **photo with their face on it. It would be colour**

15 **co-ordinated, so detainees on B wing would have a green**

16 **card, detainees on delta wing would have an orange card,**

17 **detainees on C wing would have a blue card, detainees on**

18 **A wing would have a red card. That was to make it**

19 **a little bit easier for staff to ascertain which**

20 **detainees should be where. The cards would have a small**

21 **bar code on it which detainees could use to buy things**

22 **from the shops. I think it would have their date of**

23 **birth as well and their reference number, maybe some**

24 **other information also, and their cell number.**

25 Q. Tell me this: if you were inside each of the wings, were

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29 (Pages 113 to 116)

1 the wings colour coded internally according to the
2 colour on the outside?
3 **A. I think they were, sir, yes, I think so.**
4 Q. Presumably you couldn't just walk off E wing --
5 **A. No, sir.**
6 Q. -- if you were on E wing. So that was an exception to
7 the --
8 **A. You could never come on and off E wing unless you were**
9 **being taken to the gym while the rest of the centre was**
10 **locked down, sir.**
11 Q. Tell us about the reception area. Just remind us. The
12 reception area, looking at the image, is where?
13 **A. On the ground floor of that bulky bit in the centre of**
14 **the H, towards the perimeter road, so towards the first**
15 **building.**
16 Q. Tell us about what would happen. You're a detained man.
17 You've been -- you've come off a van for the first time
18 and you're entering Brook House, or you might be
19 entering Brook House for a second or third time, having
20 been moved and transferred back. What happens to you
21 when you enter detention reception?
22 **A. So I didn't work on detainee reception, sir. My**
23 **knowledge of how it worked in practice is quite limited.**
24 **But you would wait in a waiting room -- because often**
25 **a number of detainees would show up -- would turn up --**

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1 **would be escorted to Brook House at any one time. And**
2 **you would be asked a number of questions. There was**
3 **lots of paperwork that had to be handed over. So the**
4 **admission of a single detainee took quite a while. So**
5 **it was a long and lengthy process for detainee reception**
6 **staff. It was never a job I had to do. So I'm not**
7 **quite sure exactly what was involved.**
8 Q. I'm sure somebody else will help us with those issues.
9 The wings you call A, B, C, D and E, but I think we
10 will also find that they went by different names?
11 **A. Yes, sir.**
12 Q. You called D wing at one point "delta"?
13 **A. Yes, sir.**
14 Q. And so they were also called alpha, bravo, charlie,
15 delta and echo?
16 **A. And I think Dove, Clyde --**
17 Q. Yes, I was going to add Arun?
18 **A. Arun, yes.**
19 Q. Arun, Beck --
20 **A. Yes, sir, that's familiar.**
21 Q. -- Dove, Clyde and Eden?
22 **A. Eden, that's it, yes, sir.**
23 Q. I think if you go around the centre, and we may see on
24 some of the images, you will see those names above
25 doors?

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1 **A. Yes, I think that was actually the preferred -- because**
2 **you had your kind of -- because, as an officer, you were**
3 **either sort of -- your radio was either sort of delta 1**
4 **or delta 2, so to avoid confusion between when**
5 **references were being with made to wings or officers, it**
6 **wouldn't be referred to as "delta wing", I imagine,**
7 **because that might confuse someone on the radio that you**
8 **might be speaking to delta 1 or delta 2 over the radio,**
9 **so perhaps that's why they were given different names.**
10 Q. But, typically, what did staff refer to the wings as?
11 **A. A, B, C, D and E wing.**
12 Q. I'm looking at your paragraph 133 of your inquiry
13 statement. Each of the wings, so A, C and D, had three
14 floors to them.
15 **A. Yes, sir.**
16 Q. We will see from time to time in the footage
17 a stairwell. So they're all fairly similar. B was
18 different because it only had two floors, but I think it
19 had a stairwell, nonetheless, and they all had rooms or
20 cells off them. And in the common parts, which I think
21 was on the ground floor of each of those wings, you
22 would have pool tables, table tennis tables, tables to
23 sit at, those sorts of things; is that right?
24 **A. Yes, sir.**
25 Q. Would they all have netting?

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1 **A. Yes, sir.**
2 Q. On each of the landings or just the top landing?
3 **A. Each of the landings, sir.**
4 Q. And the netting was anti-suicide netting --
5 **A. Yes, sir.**
6 Q. -- was the idea?
7 **A. They called it "netting", but it was wire. It was made**
8 **of wire.**
9 Q. Wire netting, if you like, I suppose?
10 **A. Yes, sir, I guess.**
11 Q. But not rope netting, or anything like that?
12 **A. No, not a soft landing for anyone that tried to harm**
13 **themselves.**
14 Q. How many rooms were there on each floor of each wing?
15 **A. Roughly 20, or 19, sir.**
16 Q. Were they -- forget E wing for the moment, which was
17 different, but were they double occupancy, at least
18 until about May 2017?
19 **A. Yes, sir, they were.**
20 Q. They ran either side of the wing?
21 **A. Yes, sir.**
22 Q. Describe to us, please, the rooms or the cells, as you
23 have called them? What were they like inside?
24 **A. The cells were small. They had one unopenable window.**
25 **There was a toilet in the cell which was partially**

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30 (Pages 117 to 120)

1 concealed by a wall -- like a wall that went sort of
 2 90 degrees around it, but it had --
 3 Q. Like a wave shape? Do you remember?
 4 A. There was a toilet in the corner of the cell, but then
 5 it had a sort of wall around it, but then there was
 6 about a 30-degree gap through which the detainee could
 7 pass through to use the toilet. But if you were sat --
 8 if you walked into the -- if you walked into the cell,
 9 the toilet was -- there was a sink immediately to your
 10 right, and then behind -- and the sink was coming off
 11 a wall. Behind that wall was the toilet. So if you --
 12 but there was -- as I say, there was a sort of 30-degree
 13 gap in the wall, maybe bigger -- I haven't done the
 14 measurements, but there was a gap big enough for someone
 15 to walk through to go to the toilet.
 16 The bed on the left, if you had just walked into the
 17 cell, if you were lying or sat on that bed, you would be
 18 able to see clearly --
 19 Q. Just pause there, so there are lefts and rights.
 20 I don't know, but I suspect some of the rooms or cells
 21 had the toilet on the right and perhaps some on the
 22 left, or were they all identical, or is that too
 23 difficult a question after all this time?
 24 A. Yeah, I can't say with complete certainty, sir.
 25 Q. It may not matter.

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1 A. I think they were always on the right, to be honest.
 2 Q. Let's imagine they're always on the right. You're
 3 walking into the cell. I'm at the back where the
 4 unopenable window is?
 5 A. Yes.
 6 Q. You're walking in, you're at the door?
 7 A. Yes.
 8 Q. We can have this in mind when we see footage from time
 9 to time. Toilet on your right?
 10 A. Immediately to your right.
 11 Q. Immediately to your right. Bed here, bed here?
 12 A. Yes.
 13 Q. So left and right?
 14 A. In the left-end and right-end corner of the room.
 15 Q. So if you are in the bed here, are you saying you can
 16 see into the toilet?
 17 A. Perhaps not if you have your head on the pillow, but if
 18 you are sat on the bed or you're lying at the right
 19 enough angle, you should be able to see the toilet.
 20 Q. What was done to preserve privacy?
 21 A. There was a bit of velcro which was stuck --
 22 Q. When you say "a bit of velcro", do you mean a curtain of
 23 some description?
 24 A. On that wall that the toilet was partially concealed by,
 25 there was -- on the outside of the wall, there was a bit

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1 of velcro on one bit of the gap and a bit --
 2 Q. Lengthways, up and down?
 3 A. Yes, a bit of velcro --
 4 Q. Vertically?
 5 A. Yes, sir, a bit of velcro on one side of the gap in the
 6 wall and a bit of velcro on the other side of the gap in
 7 the wall. Detainees would be given a bit of cloth to
 8 attach to either side -- to the velcro on either side so
 9 that the -- his roommate couldn't see him defecating or
 10 urinating.
 11 Q. Did that avoid smell?
 12 A. No, of course not, sir, no.
 13 Q. Or noise?
 14 A. No, sir.
 15 Q. When you say the detained men were given the cloth, did
 16 they have to mount it themselves?
 17 A. Yes, sir.
 18 Q. Did that happen during your tenure? In other words,
 19 while you were working there, is this some addition that
 20 was made to the toilets in the cells so that there could
 21 be a modicum of privacy, or was that there when you'd
 22 arrived?
 23 A. I think it was there when I arrived, sir.
 24 Q. Was it something detained men were happy about?
 25 A. No, sir.

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1 Q. Because?
 2 A. Because the room smelt of faeces, because there was
 3 a toilet in the cell and because, you know, sometimes
 4 the velcro wouldn't stick, sometimes the velcro had kind
 5 of been -- wasn't applied to the wall properly. You're
 6 in a room with a stranger. You can hear him and smell
 7 him defecating at times. You can see him. I mean, who
 8 wouldn't have complaints, sir?
 9 Q. There came a time, in May 2017, when rooms became triple
 10 occupancy. Was that all rooms or just some of
 11 the rooms?
 12 A. Just rooms on the ground floor on -- I think it was A, C
 13 and D wing.
 14 Q. Not B?
 15 A. Not to my knowledge, sir.
 16 Q. So that meant, what, three men to a room?
 17 A. Yes, sir.
 18 Q. Sharing exactly the same facilities as before, but the
 19 problem multiplied by three, not by two?
 20 A. Yes, sir. The rooms weren't increased in size. There
 21 was just a bed added to the room.
 22 Q. When you say a bed added, a bunk bed?
 23 A. Yes, sir.
 24 Q. So you had two men sleeping on one side. Another man on
 25 the other. Do you remember offhand whether the bunk bed

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31 (Pages 121 to 124)

1 side to accommodate now the third man, was that on the
 2 side where you could view into the toilet or was it on
 3 the blind side?
 4 **A. I think it was on the blind side, sir.**
 5 Q. What other facilities were there in these rooms for the
 6 men?
 7 **A. There was a locker underneath each bed, so a detainee**
 8 **had their own locker. Although, of course, when a third**
 9 **bed was added to the ground floor cells, one of these**
 10 **lockers would have to be shared.**
 11 Q. Was there a key to it?
 12 **A. Yes, they were given their own key.**
 13 Q. A locker where they could lock away?
 14 **A. Family photos that were important to them, files that**
 15 **were of importance.**
 16 Q. What else did they have?
 17 **A. A kettle.**
 18 Q. Yes.
 19 **A. A TV.**
 20 Q. Where was the TV?
 21 **A. The TV was sort of -- if you went through the cell door,**
 22 **it was kind of immediately up to your left on a bracket.**
 23 Q. So it was bolted to the wall and, what, at sort of
 24 almost ceiling height?
 25 **A. Yes, sir, almost.**

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1 Q. Freedom to watch whatever they wanted?
 2 **A. I'm not sure what channels were there. I think Freeview**
 3 **channels were on there.**
 4 Q. Sky?
 5 **A. Not that I'm aware of, sir.**
 6 Q. So no football --
 7 **A. No, sir.**
 8 Q. -- or sports channels, but, what, just basic terrestrial
 9 channels and Freeview channels?
 10 **A. Yes, sir, things like -- More4 I think was on there.**
 11 Q. Any foreign language channels, do you know?
 12 **A. Maybe, sir. It's hard to remember. I think so,**
 13 **actually, yes, now you say.**
 14 Q. Presumably the three men to a room was even less popular
 15 than two men to a room?
 16 **A. Yes, sir.**
 17 Q. Now, on the ground floor of each of the wings, taking
 18 into account that B wing was actually on the first
 19 floor, or the ground floor of B wing was on the first
 20 floor of that wing, just describe to us the common
 21 parts, if you like. What were the tables like, what
 22 facilities were there on the wing?
 23 **A. There were tables and chairs that were fixated to the**
 24 **ground in the centre of the ground floor on each wing.**
 25 **There was a pool table on each wing and there was**

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1 **a table tennis table on each wing. The wings were kind**
 2 **of decorated with house plants and bits of artwork that**
 3 **detainees had done in the arts and crafts room. I've**
 4 **said in my statement that I didn't really think, given**
 5 **that the building was built to the standard of**
 6 **a category B prison, that there's much more G4S could**
 7 **have done to improve the sort of physical elements of**
 8 **the communal areas of the wings because, you know, what**
 9 **can you do?**
 10 Q. Yes.
 11 **A. I thought the artwork was a nice touch.**
 12 Q. Where did men shower?
 13 **A. They showered on the first floor, sir, on the wings.**
 14 Q. So each of the wings had showers, communal showers?
 15 **A. Yes, sir.**
 16 Q. How private were they?
 17 **A. They were pretty private, sir, in that you could pull**
 18 **across a shower curtain and a door, so you wouldn't be**
 19 **seen showering.**
 20 Q. If, after the shower, they dried themselves, did they
 21 have to go back to their rooms to dry themselves or
 22 could they do that in the communal shower area?
 23 **A. They could turn off the shower, step out of the shower**
 24 **so that they were still behind a door, and so they could**
 25 **dry themselves there if they wished, or they could walk**

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1 **back to their cells wet and dry themselves in their**
 2 **cells.**
 3 Q. Were there other lavatories on the wing? In other
 4 words, if you wanted to use the loo, as a detained man,
 5 or indeed as a staff member, were there toilets other
 6 than those in the rooms?
 7 **A. Not on the wings, sir, no. In fact, there were no other**
 8 **toilets that detainees could use other than the ones in**
 9 **their cells, as far as I'm aware.**
 10 Q. What about staff members?
 11 **A. Staff could leave the wing and go to use staff toilets,**
 12 **sir.**
 13 Q. So the men were limited to their own rooms?
 14 **A. Yes, sir.**
 15 Q. Clothing. What did men wear? Unlike prison -- or like
 16 prison, was there prison clothing or were they allowed
 17 to wear their own clothes?
 18 **A. They were allowed to wear their own clothes, sir. If**
 19 **they came and they barely had any clothes, they were**
 20 **given sort of jumpers, but they weren't, sort of, the**
 21 **grey jumpers that you would expect to see in HMPs, they**
 22 **were just sort of blue or orange or whatever.**
 23 Q. If they wanted to wash their clothes, how did that
 24 happen?
 25 **A. They could use the laundry room, sir, which was on the**

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32 (Pages 125 to 128)

1 **second floor of each wing.**
 2 Q. That was a separate room, was it?
 3 **A. Yes. It was at the end of the wing. So you'd go to the**
 4 **wing office. You'd ask the wing officer if you could**
 5 **have some washing detergent and then you'd take it up to**
 6 **the laundry room and put your laundry in.**
 7 Q. And you'd be responsible for doing that yourself?
 8 **A. The detainees, sir, yes.**
 9 Q. Was there a dryer as well?
 10 **A. I think so, sir.**
 11 Q. Otherwise, how would they dry their clothing?
 12 **A. Yes, exactly. I think there was.**
 13 Q. What about cleaning the wing and the rooms? Who was
 14 responsible for that?
 15 **A. The wings would be cleaned by detainees who were working**
 16 **for -- you could apply for a job. You were paid £1 an**
 17 **hour. So the wings were cleaned by detainees. The**
 18 **rooms I think were cleaned by detainees when they became**
 19 **vacant, but obviously, when they were lived in, it**
 20 **wasn't -- you know, you couldn't have another detainee,**
 21 **who was responsible for cleaning the wing, going into**
 22 **the cells of other detainees. So the rooms, as**
 23 **a consequence, would become quite dirty, even if the**
 24 **detainees living in them were themselves clean, they**
 25 **were sort of depending on the previous inmate having**

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1 **been sort of clean himself, and although the rooms were**
 2 **sort of cleaned when vacant, because people were living**
 3 **in them for quite long periods of time, there developed**
 4 **an unpleasant smell in most cells, even though they sort**
 5 **of appeared clean on the surface.**
 6 Q. But if it got to intolerable levels -- I mean, you could
 7 imagine, in a two-man cell, one person who is very clean
 8 and tidy and organised and another who is the exact
 9 opposite. Those of us who have children will recognise
 10 that description. But in its application to detained
 11 people, was that a source of conflict and tension?
 12 **A. Yes, sir.**
 13 Q. Who would take responsibility for cleaning?
 14 **A. The detainees, sir.**
 15 Q. Between them? What I mean is, you could imagine there
 16 would be arguments about whose turn it was, for example?
 17 **A. Yes, sir.**
 18 Q. So presumably, if you went on A wing now, you might
 19 find, if it was completely populated, different levels
 20 of cleanliness in different rooms according to who is in
 21 them at any given time?
 22 **A. Precisely, sir.**
 23 Q. So that we understand it, no-one else, other than the
 24 detained men, was responsible for cleaning the wing or
 25 the rooms?

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1 **A. I think Aramark staff, who were responsible for -- they**
 2 **were responsible for catering but also for cleaning,**
 3 **Aramark was the company, they would clean the wings at**
 4 **times, but not the cells.**
 5 Q. Okay.
 6 **A. As far as I know.**
 7 Q. Now, you told us that each room had a kettle. There is
 8 no point having a kettle if you don't have tea and
 9 coffee. Where did that come from?
 10 **A. You could get tea and coffee, I think, from --**
 11 Q. The shop?
 12 **A. -- at breakfast time.**
 13 Q. From the shop or not from the shop?
 14 **A. Yes, you could.**
 15 Q. You could buy all sorts of things from the shop,
 16 couldn't you?
 17 **A. Yes, you could, yeah.**
 18 Q. Including vegetables and all sorts of things if you go
 19 there?
 20 **A. Yes, chocolates, flip-flops.**
 21 Q. Everything. It was a mini store, almost?
 22 **A. Yes, sir. But I think tea and coffee was actually free**
 23 **for detainees.**
 24 Q. So you could pick that up off, what, the servery?
 25 **A. Yes, in the morning, I think, and perhaps, in the**

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1 **afternoon, from the wing office, if you were polite**
 2 **enough to the officers.**
 3 Q. If you go on the wing you'll see a sort of shuttered,
 4 long area. Is that the servery on each wing?
 5 **A. Yes, sir.**
 6 Q. Is that where the men would get their breakfast, lunch
 7 and dinner?
 8 **A. Yes, sir.**
 9 Q. Where would they eat it?
 10 **A. Either in their cells or on the -- there weren't many**
 11 **spaces on the ground floor. There was chairs and tables**
 12 **fixated to the ground but there were a fair few spaces.**
 13 **Not space for everyone, but some detainees would sit**
 14 **there and eat.**
 15 Q. Where would you get your cleaning products to clean?
 16 Where would you get your toilet rolls and other sanitary
 17 items?
 18 **A. The wing office, sir.**
 19 Q. Was it rationed or could you just, you know, one minute
 20 after the next say, "I want a toilet roll. I'll have
 21 another one, please". What monitoring was there of
 22 supplies?
 23 **A. It was just within sort of reason. If someone asked for**
 24 **a toilet roll and two seconds later they asked for**
 25 **another one, they probably wouldn't get one. But if**

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33 (Pages 129 to 132)

<p>1 they asked sort of the next day or a couple of days</p> <p>2 later, they would likely be given one. You could buy</p> <p>3 better soap and stuff like that from the stop. There</p> <p>4 was kind of just the bog standard bar of soap and sort</p> <p>5 of shower gel that you were given in the wing office.</p> <p>6 If you had the money in your account, you could buy sort</p> <p>7 of Nivea or Dove from the shop.</p> <p>8 Q. I see.</p> <p>9 A. So if you had the money, you could have some nicer</p> <p>10 stuff.</p> <p>11 Q. Where did the money come from?</p> <p>12 A. Family sent -- family or relatives or loved ones would</p> <p>13 send it in for detainees, or they would turn up with</p> <p>14 cash, or if they worked cleaning wings or in the kitchen</p> <p>15 or in the library, then they would be paid £1 an hour.</p> <p>16 Q. Let's assume you didn't work. Let's assume you had no</p> <p>17 loved ones who were able to give you money and let's</p> <p>18 assume that, when you were detained, you had no cash on</p> <p>19 you? What happens with them right then?</p> <p>20 A. Which was often the case, particularly for refugees who</p> <p>21 turned up on a boat and -- or in the back of a van.</p> <p>22 Q. So what happened to them? Were they given cash to buy</p> <p>23 things at the shop?</p> <p>24 A. I think something like 90p or something was added to</p> <p>25 your account each day by the Home Office, so they could</p> <p style="text-align: center;">Page 133</p>	<p>1 friends. Equally, you know, Jamaican detainees did the</p> <p>2 same. You were only allowed to cook in the cultural</p> <p>3 kitchen if you didn't have certain convictions.</p> <p>4 If you had a violent criminal record, then you</p> <p>5 wouldn't be allowed in there because you had access to</p> <p>6 knives.</p> <p>7 Q. Knives, yes.</p> <p>8 A. But most detainees were given clearance to cook in the</p> <p>9 kitchen.</p> <p>10 Q. And this was a room, a kitchen, in which there were</p> <p>11 several ovens?</p> <p>12 A. Yes, sir.</p> <p>13 Q. So several people could cook at the same time, and</p> <p>14 utensils and that sort of thing. So when you say that</p> <p>15 the food wasn't popular, was it because it just wasn't</p> <p>16 good or it wasn't what the men detained at Brook House</p> <p>17 were accustomed to?</p> <p>18 A. I didn't eat the food, sir. I didn't want to.</p> <p>19 Q. Did staff eat the food there? Was there a canteen for</p> <p>20 you?</p> <p>21 A. Yes, there was a canteen.</p> <p>22 Q. Did you get the same food as the --</p> <p>23 A. Not the same food. We got -- the food for staff was</p> <p>24 cooked in the same kitchen as the detainees' food, but</p> <p>25 we got different food.</p> <p style="text-align: center;">Page 135</p>
<p>1 accumulate some money. I'm not sure of the exact</p> <p>2 number. It could have been slightly more, could have</p> <p>3 been slightly less.</p> <p>4 Q. In mentioning Aramark, there was something called</p> <p>5 a "cultural kitchen" which I'm not sure we have</p> <p>6 mentioned so far.</p> <p>7 A. Yes.</p> <p>8 Q. Tell us about that. What was the cultural kitchen?</p> <p>9 A. This was like a kitchen in the association areas. It</p> <p>10 was on the first floor in the corridor running along the</p> <p>11 middle of the H. So on the same floor as the gym and</p> <p>12 the detainees' shop. It was very near the detainees'</p> <p>13 shop. Detainees could apply to cook in the cultural</p> <p>14 kitchen. It was very popular because you could request</p> <p>15 certain ingredients and the food at Brook House was so</p> <p>16 unpopular that was provided by Aramark to the detainees</p> <p>17 that the detainees would really relish the opportunity</p> <p>18 to cook in the cultural kitchen because they were given</p> <p>19 quite a good range of ingredients. They'd often cook</p> <p>20 for the -- they'd often cook a lot of food and dish it</p> <p>21 out to the other nationalities, you know, so -- pretty</p> <p>22 often, you know, nationalities sort of stuck together,</p> <p>23 so if there were Indians cooking in the cultural</p> <p>24 kitchen, they'd make some food that would be not what</p> <p>25 they were used to on the wings, dish it out to their</p> <p style="text-align: center;">Page 134</p>	<p>1 Q. By which you mean? What was different about it?</p> <p>2 A. Well, it was nicer food. It was just food that people</p> <p>3 would be willing to buy.</p> <p>4 Q. You mean better quality, you felt?</p> <p>5 A. Yes, sir.</p> <p>6 Q. Are you saying --</p> <p>7 A. Some wing officers did eat the food on the wings to save</p> <p>8 money, but --</p> <p>9 Q. You paid for it, did you?</p> <p>10 A. Not if you ate the food that the detainees ate, no.</p> <p>11 Q. But if you --</p> <p>12 A. But if you wanted to have better food, you had to buy it</p> <p>13 from the servery that was in the staff room.</p> <p>14 Q. Do you know, Mr Tulley -- you've said to us, and the</p> <p>15 impression that we gain from you, is that the staff, if</p> <p>16 they wanted to pay for it, had better quality food --</p> <p>17 A. Yes.</p> <p>18 Q. -- than the detained men, clearly who didn't have to</p> <p>19 pay for it, although a staff member could pay for that</p> <p>20 food because it would be cheaper. But are you saying,</p> <p>21 from your perspective, detained men were given poorer</p> <p>22 quality food deliberately as a cost-saving exercise? Is</p> <p>23 that what you're telling us?</p> <p>24 A. It's hard to say, sir. Whether it's because of cost</p> <p>25 saving, I don't know, but perhaps -- I don't know, sir.</p> <p style="text-align: center;">Page 136</p>

1 Q. All right.

2 **A. I mean, some detainees didn't mind the food. But a lot**

3 **of them hated it, you know. They just thought it was**

4 **bland and at times inedible. There were probably a few**

5 **occasions when I did actually try the food, but it's not**

6 **something I wanted to put in my body often, sir.**

7 MR ALTMAN: I want to ask you about E wing now, and I'm

8 coming away from the other wings. Chair, I see the

9 time. It is 3.00 pm. To give the transcribers a break,

10 now is as good a time as any. If you are in agreement,

11 shall we say 3.15 pm?

12 THE CHAIR: Thank you very much.

13 (3.04 pm)

14 (A short break)

15 (3.19 pm)

16 MR ALTMAN: Mr Tulley, paragraph 135, your statement

17 page 33. You probably don't need it to refresh your

18 memory, but if you do, it's there. I want to ask you

19 about E wing, please.

20 How many cells on E wing?

21 **A. Approximately 12.**

22 Q. Although you say you can't remember the exact number.

23 **A. Yes, sir.**

24 Q. Were they the same as the cells you've been describing

25 to us?

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1 **A. They were, sir, apart from cells 7 and 8.**

2 Q. We have approximately, let's say, 12 rooms or cells on

3 E wing. Were they double occupancy?

4 **A. Technically, they could be, but there was only ever**

5 **one --**

6 Q. Person in each?

7 **A. -- person in each, so they were single-occupancy cells,**

8 **but they were suitable for two people, as far as G4S was**

9 **concerned.**

10 Q. You say with the exception of 7 and 8?

11 **A. Yes, sir.**

12 Q. What was exceptional about 7 and 8?

13 **A. They were the same size, much of the cell was the same,**

14 **but they were constant supervision cells. So instead of**

15 **have a small, narrow viewing panel through which you**

16 **would observe the detainee, you had two large glass**

17 **windows through which you could much more easily observe**

18 **the detainee. They were that way so that officers could**

19 **sit outside the cell and constantly observe a detainee**

20 **who was a great risk of self-harm or suicide.**

21 Q. I think we see one such cell during some of the events

22 on 25 April regarding D1527?

23 **A. Yes, sir.**

24 Q. So, typically, these would be cells, 7 and 8, used for

25 constant supervision by a DCO, with an ACDT form on his

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1 or her lap, making constant observations?

2 **A. Yes, sir, every couple of minutes. Maybe five minutes.**

3 Q. What, you'd be sitting on a chair?

4 **A. Yes, sir.**

5 Q. Just watching?

6 **A. Just watching.**

7 Q. When you had finished your shift of constant

8 supervision, somebody else would take over from you?

9 **A. Yes, sir, you'd hand over the ACDT and they'd continue**

10 **the observations.**

11 Q. How long would the observation be for each individual?

12 Did it -- was there a limit to it or could it go on for

13 hours, or what?

14 **A. Depend -- it would depend if the -- it would go on for**

15 **hours, it could go on for days, if the detainee was --**

16 Q. Not what I mean. It is probably my question. I mean if

17 you, Callum Tulley, were assigned to constant

18 supervision, would you be sitting there all day or just

19 for a couple of hours?

20 **A. Should be a couple of hours. Sometimes -- I mean, to be**

21 **on a constant supervision all day was rare without being**

22 **relieved. It should have been, yeah, couple of hours,**

23 **I'd say. That was probably most often the case.**

24 Q. Echo wing or, as you also call it, E wing, for ease of

25 reference. That, too, had a pool table?

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1 **A. Yes, sir.**

2 Q. Do you remember a sofa in the centre of it?

3 **A. Yes, sir.**

4 Q. If you were on E wing, were you also able to leave the

5 cell?

6 **A. You were able to leave the cell, sir, yes, not the wing.**

7 Q. Let's just understand this. Let's forget cells 7 and 8

8 for the time being. What other reason would bring you

9 on to E wing, other than self-harm, suicidal ideation,

10 for which you would almost certainly go in 7 or 8,

11 constant supervision. Forget those two cells. What

12 kind of detained man would be on E wing for other

13 reasons?

14 **A. Detainees with physical or mental health problems that**

15 **were, you know, difficult to manage. Detainees who were**

16 **perhaps violent or refractory. Vulnerable detainees**

17 **would be housed there. Those suspected of being under**

18 **the age of 18 would be housed on E wing.**

19 Q. What about if you had been on the CSU --

20 **A. Yes, sir.**

21 Q. -- the solitary confinement, would that be your next

22 step before going back onto another wing?

23 **A. Yes, you would be phased back into association. You**

24 **would be put on E wing where you could leave your cell**

25 **but you couldn't leave the wing, yes.**

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35 (Pages 137 to 140)

1 Q. So those were men who, for the reasons you give, would
2 find themselves on E wing, but they wouldn't necessarily
3 be under constant supervision in 7 or 8?
4 **A. Correct, sir.**
5 Q. Now, we discussed this a little yesterday. At the end
6 of E wing, a large, locked steel gate. That went
7 through to what, remind us?
8 **A. The solitary confinement block, or CSU as it was**
9 **referred to sometimes.**
10 Q. But affectionately known as "the block"?
11 **A. The block.**
12 Q. Describe the block or the CSU for us. If you go through
13 the steel gate, what do you find?
14 **A. Immediately find another locked door, then you have to**
15 **unlock that and go through that door. Then you're met**
16 **with a very short wing, sterile wing, smelt of urine and**
17 **disinfectant. There was approximately five cells.**
18 **Single occupancy cells. Detainees would be kept in**
19 **solitary confinement.**
20 Q. These were -- by comparison to some of the cells you
21 described earlier, where you had a TV and a kettle, were
22 these devoid of those relative luxuries?
23 **A. They were completely bare, sir. Although they did have**
24 **a bed, I should be clear about that, and bedding.**
25 Q. A bed and a toilet?

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1 **A. And toilet.**
2 Q. A sink?
3 **A. Yes, sir.**
4 Q. But that was it?
5 **A. Yes, sir.**
6 Q. And a single bed?
7 **A. Yes, sir. On occasions, particularly if a detainee was**
8 **being held in solitary confinement for a long time, they**
9 **might be made allowances, maybe they were allowed**
10 **a book, or if -- a detainee would be given a prayer mat,**
11 **for example, if they requested it, or a Bible. That was**
12 **usually afforded to a detainee in solitary confinement.**
13 Q. What do you mean by being held there for a long time?
14 **A. Sometimes detainees were held there for days.**
15 Q. Going back to the main part of E wing for a moment, did
16 detained men have the same objects as you described for
17 the other wings -- TV, kettle, that sort of thing?
18 **A. On the most part, yes. Those in 7 or 8 usually would**
19 **not be allowed a TV -- not as a form of punishment, but**
20 **because the bracket provided a ligature point.**
21 Q. So that was the main part of E wing, the Care and
22 Separation Unit certainly not. Just help us, looking at
23 your paragraph 139, why were detained men placed on the
24 CSU? Why would they find themselves on the block,
25 typically?

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1 **A. Refusal to be removed from the -- refusal to transfer or**
2 **to be deported or to go down to E wing, or sort of**
3 **non-compliant behaviour, violent behaviour, fighting,**
4 **protesting, be it on the netting or refusing to leave**
5 **the courtyards at night. If a detainee set fire to**
6 **something, sort of -- if a detainee caused any real**
7 **damage to anything, you know, it's a form of -- it was**
8 **used as a form of punishment.**
9 Q. Ought it to have been?
10 **A. No. And, in fact, I understand that it was -- we were**
11 **explicitly told in our training that it was not to be**
12 **used as a form of punishment, but it was quite obvious**
13 **that it was.**
14 Q. Yes.
15 **A. And as a way of managing detainees with mental health**
16 **problems.**
17 Q. Yes.
18 **A. That wasn't the only method deployed, of course.**
19 Q. The B wing, which was above E wing, you have told us
20 more than once, was supposed to be used as the induction
21 wing. Was it, in your time there, always used as the
22 induction wing? Did it have particular problems?
23 **A. Yes, that is correct, sir. It wasn't always used as an**
24 **induction wing. I mean, it's true that when detainees**
25 **were admitted to the centre, they would most likely go**

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1 onto B wing, almost always. But the problem with B wing
2 was it had a number of detainees on the wing that
3 weren't new to the centre, a fair number who -- some of
4 whom were involved in the drugs and gang culture at
5 Brook House, and I have said in my statement that I felt
6 this created a harmful impression of the kind of place
7 Brook House was. Because although it was a minority of
8 detainees on the wing that were involved in drugs and
9 gangs, they -- and this was communicated to me by one of
10 the wing officers, Darren Thomsett.
11 Q. Darren Thomsett?
12 **A. Yes. Whilst undercover at Brook House, he talked about**
13 **the influence that -- I think he said there were eight**
14 **members on the wing who were involved in the drugs and**
15 **gang culture at Brook House, and he was talking about**
16 **sort of learnt behaviour and the example it sets to new**
17 **detainees when they enter the detention centre, and**
18 **I agreed with him. I felt that -- that it was -- it**
19 **created a really harmful impression of the kind of place**
20 **Brook House was.**
21 Q. And the impression you're talking about was the
22 impression given to new people who came in through
23 B wing would be confronted by a number of detained men
24 who were involved in drugs and gang culture?
25 **A. Yes. Yes, sir.**

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36 (Pages 141 to 144)

1 Q. Was there a welfare office?

2 A. Yes, sir.

3 Q. Where was that?

4 A. During the relevant period, it was near the visits

5 corridor; sort of in that middle bulk of the H towards

6 the perimeter road and the first building.

7 Q. What did the welfare office do?

8 A. They would try to help detainees fill out kind of -- for

9 example, they'd help them fill out forms, if it was

10 a bail application or an application for sort of

11 temporary housing. If a detainee had poor English, they

12 would maybe try and help them get in touch with

13 a translator. I found the welfare officers to be

14 helpful officers, kind and compassionate, willing to

15 help, but there was only a couple of them and of course

16 there were over 400 detainees in the centre. So the

17 workload placed upon them was demanding and, I mean,

18 there was no way they could see to the needs of all the

19 detainees, so they're in high demand.

20 Q. And the welfare officers, was that a job that people

21 volunteered for or were they assigned?

22 A. I'm not sure, sir, sorry.

23 Q. Let's move on, then, please, to something else I want to

24 ask you about, starting on your page 37, about the daily

25 regime, including meal times. Detained men. Were they

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1 locked in their cells overnight?

2 A. Yes, sir.

3 Q. From what time to what time?

4 A. Roughly 9.00 pm until 8.00 am.

5 Q. You mentioned it yesterday, but just remind us, there

6 were two times during the day that they were locked in

7 as well -- 12.00 to 12.30 and 5.00 to 5.30. Was that

8 for meal times?

9 A. Yes, sir.

10 Q. Was there any exception -- forget the meal times. Was

11 there any exception to anyone being locked in their cell

12 overnight from 9.00 till 8.00?

13 A. No, sir, unless someone had arrived at Brook House in

14 the middle of the night and was being discharged from

15 Brook House in the middle of the night.

16 Q. We have heard mention of roll counts. Tell us about

17 those. What were they and how were they conducted?

18 A. So at 9.00 at night, when all the detainees were locked

19 in their cells, every detainee in the detention centre

20 would have to be accounted for to make sure no-one had

21 escaped. So staff would go about the wings counting up

22 the detainees. So you'd have one DCO on the ground

23 floor, one DCO on the second floor, one DCO on the third

24 floor. They would count all the detainees in their

25 cells, add the number up. If the number matched the

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1 amount of detainees that were meant to be on the wing,

2 then they could report this to the Oscar One, which we

3 spoke about earlier. If all the wings came back with

4 the correct number, then the roll count would be called

5 correct, all detainees would be accounted for, the

6 announcement would be made over the radio and staff

7 could go home.

8 If this was called incorrect, there would have to be

9 a recount. This wasn't really a problem at night

10 because detainees were going to be in their cells for

11 the next 11 hours, so it doesn't really matter how long

12 it was called incorrect for. But it became a problem

13 when there would have to be a roll count, again at

14 8.00 am, before detainees were unlocked from their

15 cells, and 12.00 in the afternoon and 5.00 in the

16 afternoon/evening when there would also be a roll count.

17 So detainees would not be unlocked from their cells

18 until roll count was called correct. So, of course, if

19 it was called correctly, detainees would be unlocked

20 from their cells on time. This happened often. But

21 what was an almost daily occurrence also was an

22 incorrect roll count, and this would revolve -- this

23 would involve a recount, and so detainees would be kept

24 in their cells for longer than was necessary.

25 Q. Yes. Did staffing levels affect the roll count or

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1 affect the lockups?

2 A. Yes, sir.

3 Q. In what way?

4 A. Well, you had -- the less staff you had, the less staff

5 there were to count the detainees, which just made the

6 process more difficult. Simple as that, sir.

7 Q. You talk about, in your statement at paragraph 147, an

8 incident that occurred in the evening of 22 May when you

9 were on D wing to assist with lock-up because they were

10 short staffed. Was there a consequence arising out of

11 that?

12 A. Out of the short staffing?

13 Q. Yes, on that particular evening. You mention it in your

14 statement at 147.

15 A. This is when detainees became upset, yes, and

16 disruptive.

17 Q. Tell us what happened, that you remember?

18 A. Well, it was just more -- because you had to -- often,

19 because, you know, at the end of the shift, you'd have

20 every detainee back on their wing. So unlike

21 association periods when everyone is outside, most

22 people are outside the wings, in the library, gym or

23 whatever, the wings are much easier to manage during

24 association periods. It's much more difficult to manage

25 during lock-up times because you've got over 100 people

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37 (Pages 145 to 148)

1 on the wing and you've got to try to encourage all of
2 those detainees to go back to their cells. So the more
3 staff you would have, the more sort of manpower there
4 was to say -- you know, usher detainees back to their
5 rooms, say, "Come on, get a move on, get back to your
6 cells". Dealing with short staffed on this particular
7 shift, there wasn't many staff to show detainees to
8 their cells, and some detainees took the opportunity to
9 be disruptive and voice their anger at having to go back
10 to their rooms.

11 Q. Should we imagine that when the lockups came around,
12 that the men were compliant, or did you find yourself
13 having to persuade them back into their rooms?

14 A. I mean, detainees did not want to be locked behind
15 a cell door for the next 11 hours, so they're always
16 reluctant to go back to their cells. Some still went,
17 despite being reluctant. Others tried to stay outside
18 of their cells as much as they could. It was rarely
19 kind of -- you know, it was just sort of -- I mean, who
20 would want to go back to the cell? You know, it was --
21 it was just a bit of a game of cat and mouse, really, at
22 lock-up time. So the more people you had, the easier it
23 was. Once you told someone, they'd usually go back,
24 because they were aware of the consequences.

25 Q. At meal-time lockups, were they exacerbated by the fact

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1 have their meals, aren't you?

2 A. Mmm-hmm.

3 Q. So could you understand any point or did you ever
4 question, "Why are we doing this?"

5 A. On reflection, I don't see there was a point. But, at
6 the time, it's the regime that -- it's the prison-like
7 regime which you become accustomed to, so, no, you don't
8 question it.

9 Q. Let's imagine that they're all out of their cells. Are
10 they all out at the same time and all in at the same
11 time?

12 A. They're all in at the same time but they're unlocked
13 slowly. So to manage the food queue.

14 Q. So, what, you'd go along the cells, what, letting out
15 a few at a time?

16 A. You'd usually let out a floor at a time. Then, when the
17 food queue had got down to a couple of people, you'd
18 unlock the next floor.

19 Q. So there is the one servery for the whole wing. There
20 isn't a different servery on each floor?

21 A. Correct, sir.

22 Q. The detained men would come out of their cells as they
23 are unlocked and queue up at the servery to get their
24 food?

25 A. Yes, sir.

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1 that DCOs would take their breaks at those times?

2 A. No, in fairness, perhaps I should have made this clear
3 in the statement, the DCOs on the wings wouldn't take
4 their breaks until everyone was in their cells.

5 Q. Yes.

6 A. But because the end of association periods was called
7 around 5 to 15 minutes before the hour, you'd usually
8 have sufficient amount of time to get detainees back
9 into their cells so you could go on a break at 12.00,
10 but sometimes they would go later.

11 Q. I'm looking at your paragraph 156. You talk about when
12 detainees were unlocked from their cells for lunch and
13 dinner. As you have told us more than once, between
14 12.30 and 1 o'clock or thereabouts, you say, more
15 usually, and between 5.30 and 6.00. Would you be
16 occasionally tasked with unlocking detained men from
17 their cells?

18 A. Yes, sir.

19 Q. What was the point in locking them away for half an hour
20 on each occasion, lunch and dinner? What was the point
21 in it?

22 A. To count the detainees. I can't -- I don't -- so staff
23 could take their breaks. I mean, there's no sort of
24 strong reason for it, in my eyes.

25 Q. But you're locking them away to bring them out again to

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1 Q. How many members of staff would there be checking who is
2 eating and who isn't?

3 A. One, sir.

4 Q. DCO or DCM?

5 A. Usually DCO, sometimes a DCM if they were particularly
6 short.

7 Q. The incidents we looked at before, on 31 May, when you
8 had that exchange with Nathan Ring. Was that at a meal
9 time or was that afterwards?

10 A. Yes, sir. Yes, it was just after meal time, yes.

11 Q. Which suggests that he was there at the time the food
12 was being dished out, or just afterwards?

13 A. At the time, sir, yes. So what would happen, sir, is,
14 you'd have -- I would be -- on that day, I would have
15 been stood at the front of the food queue, ticking off
16 detainees who were eating, because, you know, they'd
17 come to the front of the servery queue, they'd give you
18 their name and room number, you'd tick them off as
19 having collected their food. They could have just
20 thrown the food in the bin and not eaten it. There had
21 to be some way of recording it, and that was the way.
22 So you would tick them off as having eaten. Once all
23 the detainees had come to collect their food, or no more
24 detainees were coming to collect their food, you'd then
25 go and visit the cells of the detainees who hadn't come

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38 (Pages 149 to 152)

1 **to collect their food. You'd ask them why they weren't**
 2 **eating or you'd try to encourage them to eat. Sometimes**
 3 **they just weren't hungry and would eat later on. That**
 4 **was often the case.**
 5 Q. When you say "eat later on", what would they eat if the
 6 servery was closed?
 7 A. If it was 12 o'clock, then that was the lunchtime
 8 lock-up. But then, at 5 o'clock, that was dinner-time
 9 lock-up. So if they didn't come and collect their
 10 lunch, there was a good chance they'd come and collect
 11 their dinner later.
 12 Q. But they wouldn't have an opportunity of second bite, as
 13 it were, of eating lunch if they missed out?
 14 A. Correct, sir.
 15 Q. Did the same obtain at breakfast time as well or was it
 16 a different regime at breakfast time?
 17 A. Detainees just came and went for their breakfast, as far
 18 as I'm aware. Because I started work at 8.15, breakfast
 19 was dished up just before this time. I didn't oversee
 20 much of breakfast times.
 21 Q. Was there also a monitoring mechanism at breakfast time,
 22 as far as you know?
 23 A. Not as far as I know. Actually, a detainee may have
 24 been refusing food at lunch and dinner but been eating
 25 lots at breakfast. But if this persisted for a good few

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1 **days, staff would assume the detainee had not eaten for**
 2 **a few days, when he may have done.**
 3 Q. What was the nature of the form that was used to tick
 4 food refusal or fluid refusal?
 5 A. It was a table with three columns. The first column had
 6 the detainee's name and room number. In the second
 7 column -- in the third column, it was just empty. So if
 8 the detainee came to eat, you'd tick the empty box. If
 9 he didn't, you'd leave it blank.
 10 Q. So anybody looking at the form would look at the empty
 11 boxes and realise that that person hadn't eaten?
 12 A. Yes, sir.
 13 Q. That's assuming the form was correctly completed?
 14 A. Yes, sir.
 15 THE CHAIR: Mr Altman, can I ask a brief question and
 16 interrupt you?
 17 MR ALTMAN: Of course.
 18 THE CHAIR: Mr Tulley, talking about the process of locking
 19 detainees behind their doors for roll counts, am I right
 20 in thinking that for detainees who had formerly spent
 21 time in the prison estate, that would be routine to
 22 them, they would understand the reason why that was
 23 happening, even if they weren't particularly happy about
 24 that?
 25 A. Yes, chair.

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1 THE CHAIR: For those who hadn't been in the prison estate
 2 and so this was a completely different experience and
 3 unknown to them, did people have questions about why
 4 that was happening?
 5 A. Questions were rare because there was -- there seemed to
 6 be a fear from those detainees, most often, to challenge
 7 staff, but it was clearly distressing for detainees who
 8 had not been in a custodial setting when being sent to
 9 their cells and locked behind their doors.
 10 THE CHAIR: When it was explained to you during your
 11 training the purpose for conducting a roll count in that
 12 way, can you remember how that was explained to you,
 13 what the rationale was for people going back into their
 14 cells and being locked away?
 15 A. To the best of my recollection, it was simply to ensure
 16 that all the detainees were accounted for and that there
 17 were no escapees.
 18 THE CHAIR: So that you could count people without people
 19 moving around and the risk of missing somebody or double
 20 counting; is that your understanding?
 21 A. Yes, chair. Yes, that's correct.
 22 THE CHAIR: Thank you.
 23 MR ALTMAN: Let's move on from there, please. I want to
 24 look at the conduct and attitudes of other members of
 25 staff, which you deal with from paragraph 164 onwards.

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1 You were asked to set out your general knowledge and
 2 views about the behaviour and attitude of other staff,
 3 their character, personality and values and the culture,
 4 attitudes and behaviour of staff towards detained men,
 5 other colleagues and oversight bodies. Now, you've
 6 given us some of this information along the way, and the
 7 way that you preferred to do it in your witness
 8 statement was to deal with it by way of reference to
 9 some of the incidents to which we will come.
 10 But I just want to get a sort of general picture
 11 from you -- perhaps a little more than you've already
 12 given us -- first of all, by looking at your
 13 paragraph 165. What did you think of the majority of
 14 officers, DCOs in particular, who worked at Brook House?
 15 A. That they were good people, sir.
 16 Q. Was that equally true of the DCMs?
 17 A. Some of them, sir.
 18 Q. You name what you call one of the most inspiring members
 19 of staff you came across there. Who was that?
 20 A. A DCM called Stuart Povy, sir, Stuart Povy-Meier,
 21 I think.
 22 Q. What was it about him that stood out?
 23 A. He cared. He cared about -- he tried his best in the
 24 environment that he was in. He tried to see to the
 25 needs of detainees. He showed compassion. He showed

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39 (Pages 153 to 156)

<p>1 respect. He treated them as human beings. I know that</p> <p>2 sounds like kind of basic stuff that you'd expect from</p> <p>3 a DCM, but, sadly, it was not -- it was not so</p> <p>4 commonplace amongst DCMs. But I felt he made extra</p> <p>5 effort to see to the needs of detainees and he led by</p> <p>6 example. I think he showed real leadership and it was</p> <p>7 brave for him, as a DCM, to be as compassionate and</p> <p>8 caring as he was when so many of those at his level were</p> <p>9 abusive. I don't know if he was particularly popular</p> <p>10 with the abusive DCMs. I very rarely saw him</p> <p>11 interacting with them. But he just kept himself to</p> <p>12 himself, went about his business and tried to do his</p> <p>13 best in the environment he found himself in.</p> <p>14 Q. As I say, we are going to come back to individual</p> <p>15 incidents, not now, although you deal with them, deal</p> <p>16 with one in particular, at this stage of your statement,</p> <p>17 but we are going to deal with them towards the end of</p> <p>18 this general evidence from you.</p> <p>19 You have already told us about the difficulty in</p> <p>20 raising complaints, the culture of silence, what you</p> <p>21 felt was a lack of oversight from, in particular, you</p> <p>22 say in this part of your statement, Ben Saunders and the</p> <p>23 SMT?</p> <p>24 A. Yes, sir.</p> <p>25 Q. Is that what you felt, there was a lack of oversight</p> <p style="text-align: center;">Page 157</p>	<p>1 were engaged in the abuse. But if he wasn't one of</p> <p>2 them, why wasn't he somebody you could speak to?</p> <p>3 A. Again, it comes back to the question of evidence and</p> <p>4 proof. Even if he was someone who I could speak to,</p> <p>5 which perhaps he was, although he was a DCM, and so</p> <p>6 I still wouldn't have confidence that my complaints to</p> <p>7 him would have been treated anonymously, I would have</p> <p>8 had no evidence of the abuse that I bore witness to,</p> <p>9 given that the abuse -- much of the abuse I witnessed</p> <p>10 was in the cells in which there were no cameras. So it</p> <p>11 always came back to this question of, who are they going</p> <p>12 to believe? Are the SMT going to believe their chums at</p> <p>13 DCM level or are they going to believe me?</p> <p>14 Q. Did you ever discover -- apart from that one person</p> <p>15 you've mentioned already, the woman, did you ever</p> <p>16 discover whether any other officer at any level ever</p> <p>17 complained about what they had witnessed?</p> <p>18 A. I was never aware of any complaints being made by any</p> <p>19 staff members about the treatment of detainees by staff.</p> <p>20 Obviously, much later, I learned about Nathan Ward and</p> <p>21 the complaints he made to the G4S hierarchy, and he was</p> <p>22 a much more senior member of staff than I was. He</p> <p>23 wasn't listened to. So, in hindsight, I have every</p> <p>24 confidence that I made the right call. I mean, if he</p> <p>25 wasn't listened to, then what chance did I have, as an</p> <p style="text-align: center;">Page 159</p>
<p>1 from up high?</p> <p>2 A. Absolutely, sir: barely visible.</p> <p>3 Q. You also say, in addition to the culture of silence --</p> <p>4 and I'm just summarising, really, what you say in these</p> <p>5 paragraphs -- the fact that officers could brag and joke</p> <p>6 about the abuse that was conducted showed that there was</p> <p>7 faith in the culture of silence; in other words, "We can</p> <p>8 say what we want about what we have done, knowing full</p> <p>9 well that nobody will ever tell on us"?</p> <p>10 A. Precisely, sir. They had absolute confidence that</p> <p>11 nothing they said -- anything they said would come back</p> <p>12 to haunt them.</p> <p>13 Q. You mentioned earlier about somebody you met early on</p> <p>14 who herself was the subject of bullying and complained</p> <p>15 to the SMT. Do you know who she complained to?</p> <p>16 A. No, sir.</p> <p>17 Q. As far as you're concerned, and this is a question G4S</p> <p>18 have asked me to ask you, and the chair agrees that it</p> <p>19 should be asked, did you ever speak to any other</p> <p>20 officers about making complaints, in other words, do you</p> <p>21 remember I characterised it as people in your camp</p> <p>22 earlier -- Stuart Povy-Meier, for example, was, as you</p> <p>23 would have it, one of the good guys. Did you never</p> <p>24 speak to him? You said one of your problems was you</p> <p>25 couldn't speak to managers because they were in it, they</p> <p style="text-align: center;">Page 158</p>	<p>1 activities officer, at 18, 19, 20 years old, being</p> <p>2 listened to or believed? I very much doubt I would have</p> <p>3 been.</p> <p>4 Q. One of the other things we've heard from you more than</p> <p>5 once now about the "Speak Out" poster and the -- what</p> <p>6 was scrawled across it in the toilets opposite the</p> <p>7 detainees' shop, but I just want to ask you about</p> <p>8 a couple of other examples, please. Can we put up on</p> <p>9 screen <TRN0000076>. Chair, for you, it's B/100. It's</p> <p>10 a transcript from a clip for 4 May 2017. If we go to</p> <p>11 page 2, please, we see from the top -- and perhaps we</p> <p>12 can zoom in at the top half to begin with, and then we</p> <p>13 can work our way down. You talk about somebody called</p> <p>14 Babs having been suspended. Do you remember now who</p> <p>15 Babs was?</p> <p>16 A. Yes, sir.</p> <p>17 Q. Who was Babs?</p> <p>18 A. I don't know his actual -- his real name, but he was --</p> <p>19 I think he was a D wing officer, sir.</p> <p>20 Q. A what officer?</p> <p>21 A. A delta wing officer.</p> <p>22 Q. And somebody called Ginge -- do you know who Ginge is?</p> <p>23 A. I don't know his real name, sir.</p> <p>24 Q. Luke Instone-Brewer, surname hyphenated?</p> <p>25 A. That rings a bell, sir.</p> <p style="text-align: center;">Page 160</p>

<p>1 Q. Let's just look at how the conversation shapes up. I'm 2 told that Babs is -- thank you, Mr Livingston -- 3 Babatunde Fagbo. Does that mean anything to you? 4 A. Babatunde rings a bell, sir, yes. 5 Q. Staff member? 6 A. Yes, sir. 7 Q. The conversation goes this way: 8 "Why Babs has been suspended? 9 "... 10 "... no different to what most officers do. He -- 11 he was getting like a load of racial abuse from 12 a detainee. 13 "... 14 "Babs being Babs told him to go and fuck himself, 15 you know. 16 "Yeah. 17 "And someone's reported it." 18 And you ask: 19 "What, an officer?" 20 And he says: 21 "Officer, maybe, I don't know." 22 And you say: 23 "Or a detainee?" 24 And Ginge says: 25 "I don't -- I can't confirm."</p> <p style="text-align: center;">Page 161</p>	<p>1 "Got to watch what you say." 2 You say: 3 "Watch what you say, yeah." 4 And somebody else called Joe Marshall says: 5 "Yeah, so true that, in the current climate." 6 And then you say: 7 "Do you reckon it was ...?" 8 You don't complete your sentence. Ginge says: 9 "Oh, no doubt." 10 And you say: 11 "Who do you reckon it was? Staff -- do you reckon 12 staff dobbed him in?" 13 And then this person Marshall says: 14 "Dobbed who in? What are you talking about, Babs?" 15 And the conversation continues. And then to the 16 final page of this transcript, please, page 4 -- no, my 17 fault, page 4, not 46. Thank you: 18 "Well, no, he hasn't been sent anything. 19 "Just say, Ginge. 20 "No, I -- I don't -- I honestly don't -- if I did, 21 I'd tell you, who the fucking man is. All I know -- 22 "Joe Marshall: Someone's just been radio'd. 23 "Ginge: No-one likes a snitch." 24 So although it's difficult to pick up all of 25 the conversation that was going on and understand</p> <p style="text-align: center;">Page 163</p>
<p>1 Ginge: 2 "But it sounds like that's the way it's gone." 3 You say: 4 "And how did [and it sounded like Shane, maybe not] 5 and his son get pulled into it?" 6 Does that mean anything to you? 7 A. I imagine "Shane" is a -- I'm referencing an officer, 8 I'm not sure about his son. Maybe -- yeah, I don't 9 know, sir. 10 Q. Then: 11 "Same thing. 12 "What, they were giving him stick as well? 13 "Yeah, same thing. 14 "The same incident?" 15 Then a little further down, about a third of the way 16 up, you say: 17 "I bet Babs is fuming ..." 18 Do you see that? 19 A. Yes, sir. 20 Q. This conversation continues that way. Then on the next 21 page, page 3, at line 56, Ginge says: 22 "Be careful what you say, mate." 23 And you say: 24 "Eh?" 25 And he says:</p> <p style="text-align: center;">Page 162</p>	<p>1 exactly what was being said, was the thrust of it that 2 Babs had been suspended and somebody had given him up? 3 A. My inference is that perhaps a colleague "snitched" on 4 Babs. 5 Q. Which ends with Ginge saying, "No-one likes a snitch"? 6 A. Yes, sir. 7 Q. It's the same kind of idea that you have spoken about 8 many times now in the course of your evidence. 9 Another example, please, if we can take that down, 10 is transcript <TRN0000079> -- chair, B/103. This is 11 a short transcript from 31 May. If we can go to 12 page 20, please. If we can zoom in on that, please. 13 This is you talking to Dan Lake. Who was Dan Lake? 14 A. He was another activities DCO, sir. 15 Q. "[The] guy was absolutely creasing. 16 "... 17 "I was speaking to him ..." 18 You ask, "What did he say?" 19 "He said, 'Yeah, they do'. 20 You asked: 21 "What did they say he said? 22 "Dan Lake: they just said, if you see anything, 23 report it." 24 Pausing there, what was he talking about? 25 A. I'm not sure, sir. Do we know -- I should probably know</p> <p style="text-align: center;">Page 164</p>

41 (Pages 161 to 164)

<p>1 the answer to this, but I don't. When he's saying</p> <p>2 "they" I'm not sure who he's talking about.</p> <p>3 Q. You say:</p> <p>4 "No way ... gets on my tits when [something is</p> <p>5 missed] things like that."</p> <p>6 And he says this:</p> <p>7 "He says to me, 'I'm not a snitch,' he said, 'I'm</p> <p>8 not a grass, I'd never grass [inaudible]'. He said,</p> <p>9 'The only time I would tell is if it was, if I got -- if</p> <p>10 it would get me sacked as well'.</p> <p>11 "Callum Tulley: Yeah, everyone would [do] that.</p> <p>12 "Dan Lake: Which is fair, everyone would do that.</p> <p>13 He said. I am not a grass at all, he said he is all</p> <p>14 right, to be fair, he's a good lad.</p> <p>15 "Callum Tulley: He can't [inaudible] grassing</p> <p>16 people."</p> <p>17 Ring any bells?</p> <p>18 A. It doesn't sir. I can go away and rewatch this. I'm</p> <p>19 afraid it doesn't ring any bells, sir.</p> <p>20 Q. All right. Again, though, whatever the actual topic or</p> <p>21 subject matter was, it's that kind of theme again, isn't</p> <p>22 it, about not grassing up another member of staff?</p> <p>23 A. Yes, sir. The conversation here is about, the only</p> <p>24 circumstances in which Lake would grass would be if not</p> <p>25 doing so would cause him to be sacked. That's the only</p> <p style="text-align: center;">Page 165</p>	<p>1 in the morning. [Inaudible] woke an officer up last</p> <p>2 night."</p> <p>3 And you say, "What -- the detainee?". Something is</p> <p>4 missed:</p> <p>5 "What, the detainee tells the manager?"</p> <p>6 And he says:</p> <p>7 "Tells the manager, yeah. [Inaudible] grasses.</p> <p>8 Plus they hear things what you're saying and grass you</p> <p>9 up [inaudible].</p> <p>10 "Tulley: What are they like?"</p> <p>11 This might not be an example of a staff member</p> <p>12 complaining --</p> <p>13 A. Precisely, sir.</p> <p>14 Q. -- but the detainee.</p> <p>15 A. Indeed.</p> <p>16 Q. Which do you think it is in this case?</p> <p>17 A. This is about a detainee grassing.</p> <p>18 Q. So did that happen as well, from time to time?</p> <p>19 A. Yes, there was equal hostility towards detainees</p> <p>20 grassing you up as there was staff.</p> <p>21 Q. Are these examples representative -- there are only, in</p> <p>22 fact, two examples about "no-one likes a grass, no-one</p> <p>23 likes a snitch", those posters and your own general</p> <p>24 recollection of what would happen if somebody in your</p> <p>25 position did complain and it came to others' ears. Are</p> <p style="text-align: center;">Page 167</p>
<p>1 thing I can definitely take away from this. But what</p> <p>2 exactly we're talking about and the context, I'm not</p> <p>3 quite sure.</p> <p>4 Q. And who he's talking about?</p> <p>5 A. Yes, sir.</p> <p>6 Q. Then, lastly, perhaps, just one other example, if we can</p> <p>7 go to another transcript, chair, B/105, <TRN0000091> at</p> <p>8 page 11, 10 June. If we can zoom in, please. Is it</p> <p>9 Gary Croucher or Groucher?</p> <p>10 A. I think it was Groucher, actually, sir.</p> <p>11 Q. Who is he?</p> <p>12 A. He's an E wing officer, sir.</p> <p>13 Q. DCO or DCM?</p> <p>14 A. DCO, sir.</p> <p>15 Q. You're having a conversation with him talking about:</p> <p>16 "... constant watches and stuff [inaudible].</p> <p>17 Officers asleep."</p> <p>18 Was there a problem with sometimes officers sleeping</p> <p>19 during constant supervision?</p> <p>20 A. Very rarely, but it did happen.</p> <p>21 Q. He laughs and you say:</p> <p>22 "Do you reckon people do snooze on constant watches</p> <p>23 at night?"</p> <p>24 He says:</p> <p>25 "... Yeah, sometimes they [inaudible] the managers</p> <p style="text-align: center;">Page 166</p>	<p>1 these just two examples which you've captured on --</p> <p>2 during your filming representative or are they just</p> <p>3 singular examples of people expressing to you that</p> <p>4 nobody liked people grassing?</p> <p>5 A. This is a small insight into the broader culture, which</p> <p>6 was one of complete hostility towards raising concerns.</p> <p>7 Q. One of the things you mentioned earlier to us was that</p> <p>8 the issues of abuse and misconduct weren't cured by</p> <p>9 turnovers of staff?</p> <p>10 A. Sorry, sir, could you repeat that?</p> <p>11 Q. The culture of abuse and misconduct wasn't cured by the</p> <p>12 turnover of staff. In other words, people came and</p> <p>13 people went?</p> <p>14 A. Yes, sir.</p> <p>15 Q. But the new people would just -- or some at least would</p> <p>16 slot in where the others had left off?</p> <p>17 A. Precisely, sir.</p> <p>18 Q. How do you account for it? What was it that went on at</p> <p>19 Brook House that meant that new green people who came</p> <p>20 in, fresh skins, came in and in some cases behaved</p> <p>21 exactly the same? How do you account for that?</p> <p>22 A. It's hard to know. It's hard to know. You know, you</p> <p>23 don't want to make excuses for staff members who engage</p> <p>24 in abusive treatment of detainees, but I think --</p> <p>25 because there is no excuse. I mean, there were so many</p> <p style="text-align: center;">Page 168</p>

1 staff members that were able to remain professional in
2 the environment that they found themselves in, but
3 I think not to acknowledge the part that the environment
4 plays and the culture and the atmosphere plays in at
5 least allowing people to abuse others with impunity is
6 dangerous. As I said, it's not down to a few bad
7 apples. There are cultural and systemic problems which
8 give rise to the abuse. I'm not an expert, so I don't
9 understand exactly why that is. Perhaps it's partly
10 down to who G4S would recruit into these positions.
11 Something I struggle to come to terms with is why staff
12 did behave the way they did, so trying to explain why
13 people became abusive is difficult because I can't
14 relate to their thought process.

15 MR ALTMAN: Thank you. We are going to have some expert
16 evidence from Professor Bosworth in the second phase of
17 this inquiry, so maybe she will be able to explain to us
18 why this happened.

19 A. Yes, sir.

20 MR ALTMAN: All right, Mr Tulley. I see, chair, the time.
21 It is a few minutes after 4.00 pm. Can I tell you where
22 I am, so, Mr Tulley, you understand where I am and
23 everybody else does.

24 I've made reasonable progress, I think, through the
25 generality of your evidence. I've got a few more topics

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1 to cover tomorrow morning, and then we will hopefully
2 come on at some stage to looking at the incidents; all
3 right? So that gives you an idea of where we are.

4 A. Thank you, sir.

5 THE CHAIR: Thank you very much.

6 MR ALTMAN: Perhaps, chair, if you agree, 10.00 am tomorrow,
7 please.

8 THE CHAIR: Yes, thank you, Mr Altman. Thank you.

9 A. Thank you, chair.

10 (4.06 pm)

11 (The hearing was adjourned to
12 Wednesday, 1 December 2021 at 10.00 am)

I N D E X

15

16

17 MR CALLUM TULLEY (continued)1

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19 Examination by MR ALTMAN (continued)1

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