

**WITNESS STATEMENT OF** **D1851**

**BROOK HOUSE INQUIRY**  
**RESPONSE TO RULE 9 REQUEST**

1. My name is **D1851**. I have been employed in the social care sector, now I am a company director working as a gem stone dealer and am currently studying aeronautical engineering at the University of **DPA**.
2. I am a Nigeria national born on the **DPA**. I am a Christian. I have always had a legal right to remain in the UK under EU law as the spouse of an EU Citizen and I currently hold EU settled status.
3. I was detained unlawfully at Brook House Immigration Removal Centre (IRC) from 29 April 2017 to 24 July 2017 for approximately 12 weeks. My detention at Brook House was a profoundly disturbing experience and has caused me significant mental harm having never previously suffered from any mental health condition before I was detained. I have been diagnosed with Post-Traumatic Stress Disorder (PTSD), anxiety and depression as a result of the period in detention, and my experiences at Brook House IRC, for which I am still being treated and which still affects me to this day.
4. A significant event was when I was assaulted and unlawfully pinned down by detention officers on 5 June 2017 during a planned control and restraint of my roommate D390 to remove him from the centre.<sup>1</sup> However, the impact on me of this event was because it happened in the context of the entire humiliating experience, including the harsh regime, the general threat and fear of violence, the disgusting conditions I was held in and how the staff treated detainees, which I found to be completely dehumanising. It all led me to question my worth as a human being and changed me as a person.
5. I was released from detention on 24 July 2017 following a successful bail application, with bail conditions that I was to report every week at Lunar House in Croydon, with a

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<sup>1</sup> I discuss these events in more detail below and in my witness statement of 27 January 2020.

review of the conditions after 6 months. Those conditions were listed by a High Court Judge but even then the Home Office did not update my file and they alleged I breached my bail conditions even after they had lapsed and forced me to attend a hearing, only to recognise their error on the day. This further confirmed the total lack of respect for me and my basic rights that has been my entire experience of how I have been treated by the Home Office and in the IRC.

6. I cannot recall exactly what wings I was accommodated at Brook House IRC and when, however after consultation with my solicitors and having had the opportunity to consider the relevant disclosure, I believe I was accommodated at first on the induction wing (which I believe is B Wing) and then was moved to A Wing<sup>2</sup>.

### **Immigration Background and Events Leading to Detention**

7. I wish to make it clear from the outset that my detention was unlawful and that the Home Office have accepted this following extensive civil litigation and have conceded that I should never have been detained in the first place.

### **Immigration Background**

8. On 19 May 2015, I was granted an EEA Family Permit valid for 6 months (until 19 November 2015) as the family member of an EEA national<sup>3</sup>. The EEA family permit was contingent on her accompanying me to the United Kingdom. Before I came to the UK, she returned to Romania in order to visit her family and to take me back to the UK with her.
9. On 14 June 2015, myself and my wife arrived in the United Kingdom. The immigration officer checked my wife's passport and ID and then allowed me to enter the United Kingdom as the spouse of an EU Citizen.

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<sup>2</sup> CJS0072806

<sup>3</sup> DL0000087\_0210

10. In August 2015, I made an application for a residence card as the spouse of an EEA national who was exercising treaty rights in the United Kingdom. I made this application as I was aware that my family permit was due to expire in November 2015.
11. While my application was pending with the Home Office, I received a letter informing me that I had to report once a month to Lunar House, Croydon, CR9 2BY. I was required to report from 23 December 2016 between 11:00 and 13:00 and thereafter monthly on the fourth Friday. I complied with the reporting conditions.

### Arrest and Detention

12. On 28<sup>th</sup> April 2017, whilst I was reporting I was detained<sup>4</sup>. I had no idea this was going to happen to me. I was shocked. I was confused and did not understand what was happening. I remember telling the immigration officer that I had an application pending with the Home Office which they had not considered yet and they could not detain me. I told him that the application I had made was as the spouse of an EEA national, and the Home Office had confirmed to me in writing that they would accept a 'photocopy' of my EEA National wife's ID, as they knew I was unable to provide my wife's original ID due to a breakdown in our relationship. The immigration officer ignored what I said, he said he was given orders to detain me, and that once I had reached the removal centre, I could speak to my lawyer about it.
13. I was very confused and stressed, and I remember breaking down and crying. I had never been in such a position in my life. I did not know what would happen next.
14. I was taken into a room in the reporting centre where I was made to wait for six hours. During those hours, I was becoming more and more stressed because I was worried that I would be uprooted and removed from the United Kingdom. I could not believe this was happening to me in the United Kingdom, I would have expected something like this in Zimbabwe for example but not here.

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<sup>4</sup> DL0000087\_162

15. After the six hours wait, I was taken to a van and then transported to Brook House IRC. The windows in the van were tinted black so I was unable to see what was outside. There was also a glass partition tinted black between myself and the driver, so I was also unable to see the driver too. I was very scared as to what was going on. When I first entered Brook House, I was taken into a waiting room, and I was told I would need to wait for my details to be processed on to their system. I was confused and worried.
16. When I arrived at Brook House, it was in the early hours of the morning at about 2 am. I saw there was barbed wire and tall fences. It resembled a prison and was very imposing. Inside it was no different. It reminded me of a prison you would expect to see in Zimbabwe or somewhere similar. It is not what I expected a detention centre in the UK to be like.

#### Induction

17. I do not believe I received a full induction when I arrived at Brook House. I had a brief interview with G4S Staff where they took some basic details. I did not need an interpreter, as I speak fluent English. I then met with a healthcare professional, I now know to be Staff Nurse Wingert. She took my blood pressure and asked me some basic questions. I do not recall any questions about mental health. I remember telling them that I was a non-smoker, but I was later put in a room with a chronic smoker.
18. When I arrived, my phone was taken off me. I was supposed to be given a replacement 2G phone that did not have a camera or internet access to replace it, however I was told that there was no spare phone for me to have. This made me very worried. I was cut off from the outside world. It meant that I was unable to contact my legal representatives or my partner. My partner did not know where I was, she was going round the streets thinking I was missing. She was considering going to the police. The following day I was able to borrow a phone from another detainee and call my partner. When she came to visit me, I told her to help me get a phone. When she brought a phone to the centre, they still held the phone for 3 days to check it was OK before they actually gave it to me. I realised after that there is no way that there was not an available phone for me. People would be leaving the centre all of the time, and the fact that I had been detained

at Brook House meant that someone must have left for there to have been room for me, and so they must have given their phone back when they left. The G4S staff were very dismissive of me and just said they did not have one to give me.

19. I waited about 1.5 hours in the reception. There was no urgency in processing me even though I had arrived in the early hours of the morning. The G4S officers were just sitting down in their chairs in front of me and the other newly arrived detainees, laughing, talking and doing things on their computer. We were clearly not their priority. We were sat waiting while they would wander around the office, chat to each other and just ignore us while we waited. We could see them in the room opposite, as we were locked in. It made me feel like we were not important. They were very blasé about processing us and in general came across as very disinterested in the process. The first impression I had of Brook House and the G4S Staff was that they just did not care about you, that you were lower than them. It gave the impression that this was their culture, that they were comfortable acting like this in front of detainees and it was just how things were. They were clearly not worried about us complaining about the way we were being treated. They had no thought for how distressing it was to be picked up out of the blue, detained and not knowing what was to happen next. They gave me cold baked beans and rice to eat, which was food they had served at six in the evening, and so it had gone cold and congealed. I could not eat it, it was too unpleasant. By the end of this, I was tired, hungry and both mentally and physically drained.

20. I did not receive any written materials.

21. I was not told about my rights as a detainee. I was not given any materials which explained my rights. When I was in detention it made you feel like you had no rights, like you were less than human to them.

22. There was no tour of the building. I was eventually taken to the wing, but that was it.

### The Wing

23. I was initially on the Induction Wing (which I don't remember the name of, however having consulted with my solicitors I understand this to be B Wing). I had made it clear when I arrived that I did not smoke, however they put me in a room with someone who smoked constantly. I did not know that this was not supposed to happen because I was new. It was not until I spoke with some other detainees in another wing and told them how horrible it was in that room, that things in the room were being burned, that with no ventilation and no open window in the room, I was breathing smoke in the whole time that a detainee said I shouldn't stay there. I spoke to a G4S officer and told them why I could not stay in this room. It took another day for them to sort this out, and then I was moved to A Wing.
24. As soon as I stepped into the wing there was a heavy smell of drugs which I think was marijuana. I was shocked at the smell because there were G4S officers around and they did not seem to be phased by it at all.
25. The room was in reality a cell. I was also taken aback by the condition of the cell. It was very dirty. The smell in it was like a gym changing room; it smelt of sweat. It was clear that someone else had just been moved out of the cell as the sheets were old and had bloodstains on them. They also had yellow patches on them similar to sweat stains and I believe this is where the sweaty smell may have originated from. I immediately complained to the G4S officers, as I was not prepared to sleep on sheets in this condition. There was toilet and sink in the room however; the sink was filthy with stains all over it and the toilet had clumps of faecal matter stuck inside of the rim. It had clearly been there for a very long time as it had hardened and would not flush. This gave off a putrid smell and I recall asking the G4S officer whether the cell had been cleaned before I arrived. I was told that it was the duty of the detainee to clean their cells and not the duty of Brook House IRC. Again, I could not believe this.
26. The conditions in Brook House were similar to being in a third world prison (like in the documentaries). I could not sleep and felt levels of stress and anxiety that I had never felt before.
27. I also saw that the bins were full and had clearly been there for a number of days as the

smell was very strong, there were used plates with food left in them which were unattended on the tables, and the walls and floors were dirty.

### **Staff Attitudes**

#### **G4S Officers**

28. I constantly felt unsafe and treated with complete disrespect from the detention centre officers throughout the time I was held in Brook House. They were always very rude and dismissive to me. They treated me in a demeaning way and they frequently used bad and abusive language. I can't pinpoint exact instances, because they were so commonplace. They would say things like "fuck off, I don't have time for you", "stop being an idiot", "moron". This was so casually used; this was just how they would talk to people.

29. If the officers do not feel like helping you, they will not do it. They are in complete control of your life. They do not care about your basic dignity. They would say things like, "if you don't like it, we'll just lock you up or send you to segregation". There is no one to back you up, no one to support you. They have control over all of your life and can do and say what they liked. I once wanted to use the toilet but there was not any toilet paper. I went to the office to ask for some, and they just said that I would have to go to another detainee and ask to borrow some. This was embarrassing but it did not matter to them. You learned not to bother complaining or arguing, you know nothing will happen and it could make things worse for you.

#### **Home Office**

30. The Home Office Immigration Officer upstairs did not seem to care either, they do not see you unless they are interviewing you or going to remove you.

31. The attitude of the staff both G4S and Home Office would psychologically grind you down. I made a request to see an Immigration Officer 3 separate times, but they just acted as if the request never got to them. You just have to accept that reality. I was trying

to see the Immigration Officer to hand over documents my caseworker was asking from me, as there were always issues with the internet and with fax. I wanted to make sure I could hand it over in person so that they could pass it across to my caseworker which I hoped would mean I could be released. But they did not see me. Whenever they arrange a meeting with you, and you say that you have a document you want to give them, they will not take it; they will just give you the document they wanted to give you. The Immigration Officers just dismissed any concerns; they did not care. They said that they were not my caseworker, and that they were just here to give me a document. This was so frustrating and upsetting because I knew I should not be in there and if they looked at my papers then they would see that I should have been released.

32. On 23<sup>rd</sup> May 2017 I was made aware from one of the G4S Officers that my name was on a flight and I was going to be removed. The Officer showed me a list on their system, there were three groups and my name was on the reserve list. I was very worried, and I did not know what to do. I broke down immediately as I was at a total loss. I was not given any paperwork from the Home Office advising me of the flight. I was later made aware (from obtaining my Home Office subject access file in July 2017) that a decision had been taken on 17<sup>th</sup> May 2017 to remove me on the charter flight of 23<sup>rd</sup> May 2017. The GCID record stated: *"Flight booked for 23:05/17...Authority to remove on the charter granted. No barriers outstanding to prevent removal. Subject to be given no further notice. The date of the charter should not be disclosed."*<sup>5</sup>

33. On 24<sup>th</sup> May 2017, I submitted on my own an application for Judicial Review, and this was lodged on 25<sup>th</sup> May 2017 challenging the Home Office's decision to remove and detain me. I was taken off the Charter flight, however Home Office GCID records stated that the only reason I was not (wrongly) removed on the Charter flight was *"due to insufficient escorts."*<sup>6</sup> Then on 26<sup>th</sup> May 2017, I received another set of removal directions for 5<sup>th</sup> June 2017. I immediately contacted the Home Office and asked them how they were able to remove me if I had lodged a Judicial Review claim. They advised me that the unsealed claim form was not enough to defer my removal and as such

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<sup>5</sup> DL0000087\_0176

<sup>6</sup> DL0000087\_0179)



removal had been rescheduled. I said to them that they could have contacted me in order to receive the sealed claim form, that I was a litigant in person, so I was not aware of the ins and outs of the process. I gave them the sealed claim form and my removal was deferred, but I remained in detention. This was a distressing and alarming experience.

## **Use of Force**

### **Assault on the 5 June 2017**

34. I was subject to what I believe was an assault on the 5 June 2017. I have had the opportunity to review CJS005624 (which is a Use of Force record in relation to this incident) and DL0000095 (which is the statement of my roommate D390 at the time) with my solicitors. I note that CJS005624 confirms that there is video footage of the incident through a hand-held camera and body-worn camera but that G4S has not provided this footage. I also understand there may be further BBC footage which may capture some of this incident which may help. I have also read a transcript of a video diary by the undercover reporter, Callum Tulley.
35. I was maltreated and mishandled whilst the forceful removal of my cellmate (D390) from the room took place. I remember there were a number of around eight to ten officers who came on to the wing and a number of them I believe at least 6 came into the cell to take him out and to pin me down. I could not see who the officers were. I now know having considered CJS005624 with my legal representatives that officers DCO Sean Sayers, DCO Ryan Bromley, DCM Ben Shadbolt and DCM Stewart Povey-Meier were involved in this use of force on D390. They were wearing dark clothes and a jumper which covered their name badge. They were also wearing a helmet which covered their whole face but their eyes. I would not be able to recognise them if I saw them again because the only part of them that I could see were their eyes. The way they were dressed in full kind of riot gear and with heavy-duty plastic shields was menacing and overwhelming. They were like the army and it was like some kind of military raid.
36. Before they arrived at the door I was sitting on my bed. D390 was stood up next to his bed and the table, and we were talking about his upcoming bail hearing, and the fact that

G4S had told him he was going to be moved to another detention centre. It was a normal conversation, and he knew that he was going to be moved. He told me that he was going to see them and show them a document about his bail hearing and why he shouldn't be moved. He had gone to the welfare office to try and explain that he had a bail hearing coming up very shortly, and that he was happy to move afterwards if he wasn't granted bail. My bed was on the right side of the room as you come into the room, with D390's on the left.

37. The cell itself is very small, with two beds and a small gap between them which sits a table, which has a kettle on it. The Use of Force reports all seem to say that D390 was repeatedly boiling a kettle. Some of the officers have said that there was a large puddle of water on the floor of the cell, whereas some of the officers instead have said that there is a puddle of water outside of the cell. This is not correct. It is possible that the kettle had been boiled at some point that evening to make a cup of tea, but D390 was not repeatedly boiling it. Boiling a kettle repeatedly, which is next to my head where I was laying on the bed, is something I would have noticed. There is no ventilation in the room, and so it would have been full of steam if it had been boiled repeatedly.
38. The Use of Force Reports say different things about whether or not there was water on the floor. I was on my bed when the officers approached the door and then called me over. I went to the door and I don't recall stepping in any water.
39. As can be seen in the Panorama episode DCM Stewart Povey was speaking through the flap in the door. He was wearing his regular managers' uniform of white shirt and black trousers, rather than the protective riot suits that the suitable crew were wearing. He was speaking to me and asking me to come to the door and to stay to the side of the door. I told them that I wanted to comply with them, but I did not want to stand next to the door because it would be dangerous for me. I was speaking to the man very politely and I told him that because the heavy metal door would swing inwards and always hits the wall (to the point where the wall had been indented); if I stood there the heavy metal door would hit me and hurt me badly. These are reinforced doors and they are very heavy. They are designed to be very sturdy and so if I was hit by it, I would be hurt very badly. I knew how forceful and aggressive they were when they got people from their rooms

and so I did not want to put myself in harm's way. I told the G4S Officer that I would sit on my bed instead and I would not do anything, they could then come and take D390 if they wanted. I was never asked to leave the room. D390 was surprised by the officers being there in their riot suits. This was generally only done when someone was being removed from the country, not when someone was being moved from one centre to the other.

40. I do not remember which officers were involved in the use of force. They were all wearing riot gear and helmets, except for Stewart Povey and Callum Tulley. I remember Callum Tulley being there as I could see his face, but I can't remember what he was doing during the restraint. I have read the Use of Force reports, and they mention who was involved in restraining D390, but I cannot confirm this. I know that there are no Use of Force reports written by the two officers who pinned me down with their shields.
41. I can't remember if they said anything to D390 before they came in. They asked him to come to the door and he said he wasn't going to. I can't remember if anything else was said. When they did come into the cell, I was sat on my bed and I stayed there, I did not move or try to interfere at all. I believe around four officers pinned down my cellmate with their shields. They held him against the bed with their shield and then held his arms behind his back. They pushed him on his front so he was face down on the bed. He was screaming that he didn't want to go, but he wasn't being violent towards anyone. There was no need for them to be so forceful toward D390. From what I saw this was over the top use of violence on D390. Whatever reasons they had to do that to him they had none at all as far as I was concerned. It was totally unjustified excessive use of violence as a totally defenceless person.
42. The two officers pinned me down using their shields as I was on my back. One officer was pressing down with his shield on my chest, the other was holding down my legs with his shield. There was no need for this given I had always remained compliant and I was of no threat to them, I was just sitting on my bed. I would understand more if I had a criminal conviction or I had been violent or noncompliant before, but this was not the case. They told me they were doing this to protect me. I did not understand this, how could they pin me down to protect me. I needed protection from them.

43. I was screaming for them to just release the pressure, but they ignored me. I cannot remember exactly how long they pinned me down for, but it felt like an eternity. I estimate that it took place for 2 to 3 minutes. I am not relatively speaking a muscular person nor am I well-built. They had no reason to believe that I could overpower them and having what I think was two big, burly men using violence to pin me down was entirely unnecessary; especially given that I was complying with them and they would have already known by checking my profile that I was not a risk. I felt so threatened at this time as I did not know why they had done this. I was shouting at them to try get them off me but they would not listen. D390 was also screaming out in pain and shouting at them to stop. I think they put handcuffs on him but am not entirely sure. It was hard to see clearly as the two officers who were pinning me down were blocking some of my view. It was all very alarming and difficult to see what they were doing to him. I believe it was two officers that took D390 out of the cell. They were restraining him and he was kind of bent over as they took him out of the cell.
44. When D390 was taken out of the cell the other officers let me go when they lifted their shields from my body. I felt so threatened at this time as I did not know why they had pinned me down. I was shouting at them to try and get off me, but they would not listen. DCO Ben Shadbolt has recorded that DCM Stewart Povey met with me afterwards, and that I was calm and had no problem with what had happened. This is not true. I was so shocked about what had happened. I remember telling them if I knew who they were I would put in a complaint against them personally. They did not care what I had to say and did not respond to me at all. The way they were dressed made the whole experience even more menacing and distressing.
45. After they took D390 from the cell, they locked the door behind them and left me in the cell alone. All the other cells were locked up as this took place while we were in lock-up before dinner was served. They unlocked the door around 40 minutes later along with rest of the cells.
46. This had a huge impact on me because up until this point all of the difficulty I was facing

was mental strife; in that the struggle was trying to keep a positive attitude in a very difficult environment. However, this took on a completely different aspect in that they had physically touched me, which added an additional fear of the officers. I had been physically assaulted without any justification. This was the first time in my life that I had been treated in this way. One has to understand that this type of experience, for someone who does not involve themselves in violent exchanges, is an extremely stressful situation to be in. I cried a lot after this. I did not feel safe in my cell anymore and I already did not feel safe outside of it (gangs in detention, violent criminals, drugs, violence amongst detainees, conditions in the detention centre). All the detainees knew very well that the G4S officers enjoyed these very physical situations. To be honest when I watched the Panorama episode and saw how they commented positively about very physical contact with detainees, it was not a shock to me. This was because it was already widely known that they enjoyed these situations.

47. I remember telling them afterward that if I knew who they were I would make a complaint against them personally. They did not care what I had to say and did not respond to me at all. I felt that there was no protection for me in detention. There was no oversight regarding the way we were treated. There was no limit on the amount of time we were detained. I felt helpless, and completely vulnerable. There was no guarantee that my health and safety would be safeguarded while I was in detention. It felt like a lawless environment.

#### **Other use of Force**

48. Generally whenever they would remove someone, they would lock us up in our cells, and so I only ever could see things through a flap in the door, and so I cannot describe in any detail what was happening. I can say that these incidents would regularly happen and we would hear commotion when removing people. We would frequently hear detainees being taken by the G4S officers and they would be shouting and screaming. Having experienced how violent they were with myself and D390, I am sure this was repeated elsewhere.

49. I was able to see one detainee being forcefully removed who I understand the Inquiry are referring to as D275. My own memory was that this was around late May/early June and my solicitors have confirmed to me from disclosure that it took place on 13 May 2017<sup>7</sup>. I could see D275, who I thought was Pakistani or Middle Eastern but am told he was Algerian, protesting. He wanted to be removed from the UK and be returned to his home country but the Home Office failed to do that. Eventually kitted up officers arrived, what they called the Suitable Crew (which I believe is the National Tactical Response team), and they grabbed him and removed him from the netting. I wasn't able to see much as the staff had by this point locked us up in our cells. I could see the security crew walking by in their riot gear, and I could hear the man on the netting protesting. I knew that the crew was here for him. After a few minutes, I could hear him screaming as he was being dragged off. I understand he was taken to segregation. I remember seeing this on the BBC documentary; the undercover journalist was watching it happen.
50. There were, also, numerous instances where officers would break up a fight, or would restrain someone who was high on spice, and it became so normal you would almost ignore it. It is difficult to distinguish between when they were intervening to break up a fight and when they were using force on a detainee.
51. As I have explained verbal abuse was very common from the officers. They had no respect for us.

#### Other threat from Detainees

52. I generally felt very unsafe from the other detainees in the centre. I was threatened by a man who was a Pakistani national. I was playing pool with a few other detainees and he came over to us and told us he wanted to play. Myself and a few other people told him he would have to wait until we were finished. He came right up to me and said, 'Do you know who I am'. I did not respond because I am not a confrontational person, I do not like to have fights or arguments. He then proceeded to shout at me saying he was going to kill me and that he was going to cut my head off. He also gestured putting his hand

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<sup>7</sup> CJS004906

across his neck as if he was going to cut off my head. I had never experienced anything like this before. I was very frightened. I am not used to dealing with violent people. His immediate reaction was to be violent and resorted to threats. There was no officer present. No protection at all. The G4S officers would not do anything even if you reported it and so going to report it would have been a waste of time. This was an opportunity for me to play pool and try and get a release from stress, even in part. But instead, I was put in a very stressful situation and I felt I had no protection.

53. Another occasion, when I was queuing for food, another detainee tried to cut into the queue. When I told him that we were all queuing he shouted in my face telling me he did not care, and he did not want to queue. I kept quiet after this because I do not like getting involved in any fights or arguments. I had no idea where it would lead and if anyone would help me if it got out of hand.

54. Every day I would wake up in Brook House and I would be fearful for my life. Just knowing I was living somewhere with murderers and violent people was terrifying. I felt extremely unsafe around these people and could not rely on the staff to protect me- it was out of control. It was very mentally draining trying to just get on by.

### **Physical Environment**

55. I think it is important to understand that the assault was only one part of the damage that was done to me when in detention and that it was the context in which that assault took place that meant it had such adverse effects on me.

56. The physical environment, conditions and regime were certainly contributing factors in my negative experiences at Brook House IRC and made my distress very much worse and which caused me to develop of mental health issues.

### **Accommodation**

57. I shared a room with five different people at various times, however I only ever shared with one person at a time.

58. The first person I shared with was on the induction wing. He was a Moroccan man, and he smoked constantly. He also had some severe mental health issues. In the middle of the night he would be roaming the cell and talking to himself. I was very scared, I did not know what he was capable of, and I hadn't experienced anything like this before. Sometimes he would just be standing by the side of my bed staring not at me but at the wall. I would wake up and see him just standing there. I do not remember his name.
59. When I was moved to A Wing, I shared a cell with a Nigerian man. This was only for about 3 days or so. When he left, D390 was moved into my room. I was with him for about a month. After he was forcibly removed to Harmondsworth IRC, I shared with a Pakistani man. He was there for about 2 days before he was released. Lastly, there was another Nigerian man. I do not remember his name, but I remember that he was an older gentleman, over 50 years old. This was the last person I was with before I was released.
60. We were locked in our cells throughout the night, from 9pm to 8am. We were then locked in again at 12 or 12:30pm for lunch, so that they could control the queue of people to get lunch. They would open up each floor one at a time so that the queue wasn't too long, but this meant that if you were the last floor to be unlocked, you could have been locked in sometimes for over an hour and would have to hope that there was something left for you. Often by the time I got to the front of the queue there was nothing left for us. I would ask if they could make something for us, or if we could use the kitchen to make something for ourselves, but they would always refuse, and so we would go hungry. I was already under a lot of pressure because of the situation I was in (facing removal) and being deprived of food pushed me close to the edge. There was one occasion I recall when I did not eat for about 18 hours.
61. Depending on which floor you were held in, you could be locked in from 45 minutes – 1 ½ hours if you were the last to be served. They serve dinner at around 5 / 5:30pm which was a similar experience, and you would be locked in for the same period again. Then, you would be allowed out of your cell but only until 9pm. I am not a child I did not know why I had to be locked in at 9pm.



62. There was the option of some activities, I believe, however I cannot imagine anyone in detention would want to do any activities. If an immigration officer tells you that you are going to be removed, what activity would you want to be doing? You would be spending hours or even days trying to get documents scanned and sent to your legal representatives or to the Tribunal, you wouldn't be thinking about whether there are any workshops or classes you could go to. There was a small gym and small space for football, and there was an area you could go outside and get some exercise. I hated this space, because there were high fences and barbed wire with netting overhead, which reminded you exactly where you were. It felt so much like what I imagine a prison to be. It felt like I was in a cage. Planes were constantly flying overhead as the runway for Gatwick airport is directly opposite Brook House, and each one would be a reminder that I could be put on one of those planes at any moment. I would go outside when I needed fresh air and when I felt claustrophobic, but it was very stressful being there.

### **Poor Conditions**

63. My cell room was a small room with two single beds at opposite sides of the room. The size of my room was roughly 3 metres by 5 metres. When you entered the room if you looked to your left you would see a basin. Next to the basin was the toilet with a partition on the right and in front; about waist high. This was there to give some element of privacy although when you would sit to use the lavatory you could see the fellow detainee. There was supposed to be a curtain but the rooms I was in they did not have this. The toilet in the cell was right next to my bed. If I wanted to use the toilet, I would have to do this in front of my cellmate and vice versa. In addition, there was no ventilation so the smell would occupy the whole room and was horrible. There was a wall-mounted fan, but it only blew air into the room, which would only help in spreading the odour.

64. The showers were communal and as such I had to face the embarrassment of disrobing in front of other men. There were partitions between the showers, so I did not have to shower in front of others, but the partition only ran halfway to the ceiling and halfway to the floor. This meant that when showering you had the run-off shower water from the people the other sides of you splashing over your legs. There were about 12 showers for

the whole detention centre. They were not well maintained, and they generally had a bad smell. The only way the shower room was maintained was by the detainee cleaning up after it was used. Most of the time they did not because the showers were in such bad condition. For example, the showerheads and taps had a build-up of lime scale, rust and grease. The drains would not work sometimes which would cause a build-up of dirty water. On other occasions the showers would smell.

65. There was a window in my cell but this was blocked off so there was no proper ventilation. The size of the window was roughly one and a half metre by one metre. I often felt like I was suffocating in there. It made me suffer from recurring headaches every day. I remember other detainees who would come from prisons would say that Brook House was worse than those prisons they were in.

#### Stressful Environment

66. It was a very stressful and negative environment. As I said, we would frequently hear detainees being taken by and they would be shouting and screaming. This created an atmosphere of fear and stress because they would be taken at random times, especially if they were considered a security risk. I noticed that the Home Office would use a policy of giving them something called a removal window; this allowed the Home Office to remove persons without notice which added a lot of stress to us in general. I was given one.<sup>8</sup> I felt under a constant apprehension of being removed at any point. This type of environment is toxic because there is no release from the stress. The sleep that you get is not comfortable because mentally you are not resting. You go to sleep under stress and wake up under stress. The day consists of speaking with lawyers, other detainees and officers solely about removal – there was simply no break from the stress, and it breaks you inside. I even contemplated taking drugs as drugs were so readily available in the detention centre to escape although I did not do this. It showed how desperate I was.

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<sup>8</sup> DL0000087\_0176

67. There were also people deeply frustrated by not being removed and able to go home when he wanted to. One man that was asking the Home Office to take him home but he was not put him on a flight for a very long time; is shown on the Panorama. I was there at the same time. The fact that we also had people in the detention centre asking to go home but were not being permitted to leave; added further stress amongst everyone that was detained.
68. It was mentally draining trying to just get on with my life whilst in Brook House. I was constantly tired, always stressed and crying frequently. I was always on edge and I lost count of the sleepless nights I had. The food was poor, and I was locked up for the majority of the day. My freedom, even within the context of a detention centre, was non-existent. The officers and staff simply were not concerned with the safeguarding of my welfare or safety. As I have said the G4S officers were demeaning and rude. They spoke to me with utter disdain and disrespect which was very demoralising and undermining. It destroyed my self-esteem and left me feeling angry but also worthless.
69. The fact that we would hear people screaming in the detention centre was also very stressful. It could be the middle of the night, and we would hear people banging on the heavy metal doors and they would be reciting religious scriptures and shouting. Your sleep would be interrupted without fail. Others would scream about killing themselves and you would hear others self-harming. It was also not uncommon to see people wetting themselves, collapsing and frothing at the mouth because of spice. This damaged me both mentally and physically.

### **Drugs**

70. Drug use was very prevalent at Brook House. I witnessed a lot of people smoking spice and marijuana whilst I was at Brook House. I do not know if there were any other drugs being used in the centre.
71. Spice was being sold by a detainee in the cell two doors away from mine. I do not remember the names of the detainees in that cell, but I do remember that one of them was Nigerian. I remember he had been in the centre for a long time, around 7 or 8

months. He became sick of life at Brook House and so applied for Assisted Voluntary Return, but he still was not removed. There were many people like this I met in Brook House, who just wanted to go back to their own country, but were not able to for whatever reason, and so they were just stuck in detention. This made them feel even more distressed and fed up with being there.

72. I never saw this Nigerian detainee selling drugs myself, but it was widely known that he was the one who sold it. He smoked spice himself, as well as marijuana when he could smuggle it in. Whenever any detainees who smoked spice wanted some, they went to him. I saw him giving other detainees spice. I cannot confirm that he was selling it, as I never saw money or anything changing hands, but I saw him giving drugs to detainees who went to his cell.

73. Often people would smoke spice in the cell. Sometimes you would walk past and see 6 or 7 people were in the cell, all completely slumped over, looking like zombies. They would be crawling over each other, just out of their minds. Spice really has a scary effect of people who take it. The best way I can describe it is like they become zombies. They lose their minds, and do not remember anything that they do. They lay down and moan, or they stare at the wall without moving for hours. The effect can vary on the person. The majority are just like zombies, but some are overly active. They might do anything, you can see some of them walking down the hallway and banging every door. They do not know what they are doing, and it can be very stressful seeing people like this. You do not know what they might do, they are very unpredictable, and that can be really scary. Sometimes people on spice would be beating up each other, fighting and screaming, and when the spice wears off, you can see them chatting and playing pool together, as they can't even remember what they were arguing about or even that they were arguing.

74. I know that other drugs were used in the centre. I know that people were smoking marijuana, I have seen maybe 30 times people smoking marijuana. It is not as common as spice, I think people are generally more careful with the smell, as it is more obvious, but spice is very common. On my wing at least, you have one person at least average a day that needs medical attention as a result of spice.

75. When people overdose on spice and need medical attention, it is very obvious. Some struggle with breathing, they collapse, they can't stand. They might be thrashing around, and so staff would restrain the person and put them on a wheelchair or a gurney. You would see people almost dying, it was very scary to see. I used to work in healthcare before I was detained, so I have training in recognising when people need medical intervention and assistance. I know the difference between when someone needs a bit of help compared to a real medical emergency. You can see people struggling to breath, their face changing colours, eyes rolling back. You would see nurses and staff running down to try and resuscitate that person, to try and stop them from dying.
76. It was very shocking at first to see this happen. But it soon became routine – you would see this happen every day. It felt like this was just a part of the general experience of detention. Everything in detention was shocking, and this quickly became just another one of those experiences.
77. Before I was detained, I had never been close to drugs, or in a situation with any kind of law enforcement or anything like that before. My first experience with being arrested and detained and with someone overdosing on drugs all happened at the same time. It shocked me, I couldn't believe this was really happening. If something like this would happen outside of detention, it would not be anything to do with you, it might be a tragic situation, but you wouldn't be stuck there with them. You would be able to go on and live your normal life. I had never been around anyone overdosing on drugs before, it might be an older person who is collapsing because of ill health.
78. I never took any drugs myself. No one ever tried to pressure me into taking drugs either.
79. I understand that the drugs would be coming in to the centre from certain staff members. I never saw any staff members giving drugs to detainees, but the guys who sold and smoked the spice said that they got it from the staff. They obviously would not tell me which staff members they got it from, just that it was from the staff. Other detainees would talk amongst themselves about where it would come from. They said that there was a young female officer who was involved. I cannot remember her name or describe

her, as she was not on my wing, and I only saw her twice ever. I know that there were other officers involved, both male and female, but I do not know who they were. I know that some would come in through the visits room, that the visitors would smuggle drugs in. When my partner came to visit me, she was searched thoroughly, and so anyone who was trying to smuggle drugs in through visits was clearly not being searched. Either the people doing the searches were not doing their jobs properly, or they were letting people bring the drugs in.

80. I did not report drug use to G4S staff ever. There was no need. They would see it themselves all the time, there is no need to report it. It is not like the people taking it hide that they are taking drugs, they do it out in the open. The staff see it themselves. They do not do anything about it. The only reaction is when someone needs a medical intervention, otherwise they just do not care. They all know the room where people get the spice from. There are cameras outside, you can see people gathering outside, but they do not do anything. If they see someone collapsed or just zombie-out, they just say "oh god, not again" and then walk away. They would never search the room for drugs, noticing a room of passed out spice users would not trigger a search or anything like that.

81. I never used drugs so it is hard for me to say whether there was any rehabilitation support given to drug users, but none of the staff care about rehabilitation. You have to care about the people in detention. The mission there is to keep people locked up as long as possible, and then eventually remove them. Whatever happens, they just have to make sure they do not die before being removed.

82. I have never seen anything about a meeting talking to or rehabilitating drugs users. I have seen people carted away to hospital after overdosing on spice, by the next day they are back in the centre smoking spice again. It is a cycle, over and over and over, and every day you see more and more people using spice. I know of a detainee who had quit smoking anything a year before he came to Brook House. After he was refused bail a few times, he started smoking marijuana and spice. People who used spice said they never remembered what happened while they were high. They said they used to smoke

it to fast forward time, so they would not have to deal with another day in detention and some did it to escape the stress and because they were struggling to cope.

### **Protests**

83. I did not take part in any protests whilst at Brook House. I was aware of some, and I did see the man protesting on the security netting which I have described above. He wished to return back to his country, but he was not able to for whatever reason. He was fed up with being in detention, and was telling everyone he just wanted to go home. I did not understand this, if the whole point of a detention centre is to hold them so that they can be removed, and that person wants to leave, why can't he go? This place had clearly broken him to the point he would rather go back to his home country, but he was still stuck in Brook House.

84. I believe this protest started around 1 or 2 in the afternoon. I cannot remember exactly what time, but it was a couple of hours before we were locked up for dinner. We were watching him while he was on the security netting on the third floor, and he was shouting and screaming that he was angry and tired and that he just wanted to go home. He said that he had submitted a document to go back home over two months ago. He was saying something like "what is going on here, you brought me here because you want people to leave, I want to leave, but I am still here!".

85. We were locked up after about 3 hours at the normal time I think about the usual time at about 5 o'clock. I believe that they calculated that we were going to be locked up at that time anyway, and so they waited until we were locked up before removing him from the netting but that meant he was one there for a long time. This day we were locked up for around 45 minutes while what they called the Suitable Crew (which I believe is the National Tactical Response team) removed him from the netting.

86. When I was locked up. I wasn't able to see much. I could see the security crew walking by in their riot gear, and I could hear the man on the netting screaming. I knew that the crew was here for him. After a few minutes, I could hear him screaming as he was being dragged off.

## **Health Care**

87. Access to healthcare was not adequate at all. They acted like they did not care about detainees at all, both the healthcare staff and the G4S officers. It was the norm that if you requested to see someone at the health centre, you would be made to wait days even weeks. You were lucky if you could be seen and treated within a few days.
88. There were several times where I would ring the buzzer in my room to ask for something for my migraines, which I suffered from quite a lot, but I would get no response, there would be no staff in the office.
89. There was another occasion I think on about the 6 May 2017 where I was suffering from a serious flu, and I requested to see someone from healthcare. I was only able to see someone 3 days later on the 9<sup>th</sup> May 2017. I asked them for something to help with the flu, but they said they had nothing for me. They only said paracetamol, which is all they ever seemed to give out. No matter what you were suffering from, they would just give you paracetamol. I said that I was willing to pay for a nasal spray. They said that they could not do that. I said if they would order it I would pay for it, that even if they did not have something in that they could use the money from my detainee account which they have access to. They said they would not do that. If I was outside of detention, I would see a doctor and they would give me a prescription, which I would pay for at the pharmacist. I could not understand why they wouldn't do this for me in detention. I was having serious migraines and flu symptoms which meant I could not sleep during this period. I was desperate for something to help me, but they refused to do anything. If I am ill and I go and see the doctor or nurse they should do something to help me, but they did not care.
90. The paracetamol was collected from the staff office. I was not prescribed paracetamol by a nurse. I was just given paracetamol from the staff office, as that was where it was kept. I was just told to go to the staff office, or I would go there directly to get some. There are entries for example in the records for the 26 May 2017 at 22:43, when I am given paracetamol but this was by G4S staff not an appointment with a nurse. This happened again on the 27 June at 22:29 hours and on the 08 July 2017 at 03:05 hours.



91. From my recollection, I only saw Staff Nurse Joanna Wingert on one occasion, which is when I first arrived at Brook House and had my initial screening. I don't recall seeing her again after this. All of the paracetamol was given by G4S staff from the staff office, or from when they answered the buzzer in my cell during the night.
92. I did not make any official complaints about healthcare at Brook House, other than orally expressing my frustration with them for not being able to get me nasal spray.
93. Nobody from healthcare ever proactively approached me about my health even though I was in there for 3 months. My mental health was deteriorating during that time. I experienced acute fear, anxiety, distress and I could not sleep. My mood was very low. I was assaulted and witnessed frightening and disturbing things like people on drugs and fights. It was chaos at times. It was all I could do to get through each day but no member of healthcare or staff ever asked if I was okay or offered any support.
94. I remember one night when I need urgent help for a medical problem for my cellmate and nobody came. At about 2am in the morning, D390 suddenly got out of bed and started roaming around our cell and hitting walls. He started saying things that did not make sense, it was as if he was not really there. I called the emergency line for around 30 minutes, but nobody ever came to help. When this was happening, I was so scared. I had not witnessed anything like this before. I had never seen my cellmate taking any hard drugs. I had only seen him taking anti-depressants which he took on a regular basis. I remember seeing him take some that morning. I do not think he had taken anything else because before he went to sleep that night we were just chatting like normal. I was left with this person acting extremely unusually and this situation could have easily resulted in him either dying or me being physically hurt. I cannot begin to describe the level of stress and anxiety I suffered. After around 45 minutes, he finally calmed down, but those 45 minutes seemed like a lifetime. The officers just did not turn up – I did not feel safe. Again, I cannot stress how the conditions in that detention centre seemed to be designed to mentally torture you. All of this had an impact on me that I cannot express in words. A person that has been through it knows how this all affects you. Every incident builds up the stress, fear, anxiety inside. I am still feeling the effects of it all.

95. The ringing of the bell in the office is so loud, there is no way that the staff did not hear it. I could hear the buzzer in my cell on the top floor, so even if there was a staff member asleep in the office, there is no way the buzzer would not wake them up. I think that the most likely reason they did not respond is because there was no staff in the office. Brook House was always under-staffed, there never was enough people to respond to everything that was happening. This was very concerning when it was known that detainees were taking drugs and may have needed medical attention urgently.
96. I had also used the buzzer several times when I needed paracetamol as I used to suffer from very bad migraines. Sometimes they came but often when I pressed the buzzer no one would show up. It was very frustrating to have no one answer the buzzer. What is the point of having an emergency buzzer if no one responds to an emergency? Even if it was an emergency, it made you feel like no one cared about you.

### **Rule 35**

97. I did not see a doctor for a Rule 35 assessment. I was aware of this process, but I did not think it was for me while I was in detention and the general understanding between detainees was that it was for those who were victims of torture. It was hard to process my experience of detention while I was there, it was very traumatic, but I was almost so shocked by everything I didn't realise how much it had affected me. I thought that when I would be released everything would be back to normal, but it was not. When I was first released, and I went to Gatwick train station, I realised something was different and I was not the same person from when I went in there. Whenever someone walked by me, I got startled and anxious. I was afraid of everyone. This is when I realised the extent of the impact detention had on me.
98. The impact of detention on my mental health was serious and for me profound. I was a normal person when I went in there. I thought I was a strong person mentally able to

cope with stress but going into detention changed that and me. It caused my mental health to deteriorate and it break down. I give more details in my witness statement.<sup>9</sup>.

### **Access to legal advice**

99. Aside from the legal advice surgery, which I did not have to use as I already had legal representation, it was very difficult to get access to legal advice. As I have said before, I did not have access to a phone for the first two weeks. Even after that, it was still very difficult as you only were given a very small amount of phone credit, and you only get a very small amount of money in your detainee account. If you didn't have someone on the outside who could give you money you would barely have enough credit to call anyone.

100. The only other option would be to use the internet, but this was always incredibly difficult to get access to. The majority of the time the detainee's internet was down. Whenever there was a Charter Flight removal shortly, the internet suddenly would not be working. While I obviously do not know for sure whether this was intentional, it always seemed to happen when people needed it the most. When the internet was working, there were many websites that were blocked that you couldn't get access to, which you might need to. But it was so unreliable that you couldn't use it most of the time.

101. If you needed to send an application to the court to stay your removal you would not be able to email the Court or to send documents to your legal representatives. The fax machine would also not be working most of the time. It felt like you were trying to do everything you could to stop your removal, and the Home Office and G4S were doing everything they can to stop you.

102. On one occasion, I was required to serve a sealed claim form on the Government Legal Department for my Judicial Review. I could not send it to them because the fax wasn't working and the internet was down. This Judicial Review was to stop my removal, and

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<sup>9</sup> DL0000094

I was told that they would not be stopping my removal because they had not received the sealed claim form. I had earlier been able to send the unsealed claim form, and fortunately the High Court had sent a sealed copy to GLD, but they said that because I hadn't myself served the sealed claim form I was still liable for removal. This was so terrifying to me, that I might be removed just because the internet access at the detention centre was not working.

103. When the internet and fax machine was down on the wing, you would have to go to the G4S office to send a fax or to scan a document. This meant that the staff knew all about your case, as they would see your documents, they would scan it to their emails and on to their system. It made you worried about what they might see and whether they would treat you differently if they knew what you were saying in your court case.

104. Using the G4S scanner would take such a long time. There was only one machine for so many people who were waiting to use it. In a detention centre with around 500 people in it all of which have their own immigration problems, there is only one working scanner in their office. Each person would want to scan around 50 plus pages, and so it would take forever. On one occasion I tried to scan some documents, it took me three days to get this done, as when I got to the end of the queue the office was closed. I had to get up very early and miss breakfast and hope that they were still open when I got to the front. If you missed anything or made a mistake in your paperwork, you would have to go back and wait another 3 days or so of queues before you could scan anything again. I feel like it is designed to be this bad, it must be. The detainees' internet would always be down, but their own server would be working fine. Again, it made me feel desperate and so stressed.

105. The only letters I would ever receive was from the Home Office. These were never anything positive, they would only be letters saying why I was in detention and that they were trying to remove me from the UK. They did not deal with the facts of my case and they kept repeating things that I believed to be wrong which was very frustrating and demoralising. It made me feel so hopeless.

## **Visits**

106. As I explained for the first two weeks of detention, I did not have a phone, and so could not contact my legal representatives. I did later have visits; my partner was coming to visit me every week. It would really help me when she came to visit, to try and keep me sane, and to bring some money. She would have to book a visit two weeks in advance, if she didn't book that early she wouldn't be able to come as there wouldn't be space.

### **Complaints and Oversight**

107. I have never heard of the Professional Standards Unit, or its acronym, the PSU. Following discussions with my legal representatives, I now understand what it is and what its role is, but this was never something I was aware of whilst I was in detention.

108. I have never heard of the Independent Monitoring Board, or the IMB. Again, I now understand its role following discussions with my legal representatives, but this was something I was not aware of whilst I was in detention. I was never informed of my right to make a complaint to them or that they even existed.

109. I have heard of the Prisons and Probations Ombudsman, but this has only been since I was released from detention. I believe it was as a result of my civil litigation relating to my unlawful detention but again I had never heard of them whilst I was in detention.

110. I had heard of Gatwick Detainee Welfare Group when I was in detention. I did not really understand what they were for, other than being able to work out the basics from the name. I believed they were some sort of charity organisation for detainees, but I did not know what they actually did or whether they could help me at all.

111. I was aware of the Chaplaincy at Brook House, and I went to some of the church services from time to time, but I never went to them for any help, and I was not aware that they offered any help.

112. I did make a few complaints when I was in Brook House, but they were always made orally and were never officially logged complaints. I would complain about the fact that

it was very difficult to see the Home Office Immigration Officers, as when everything was broken such as the internet and fax machines, I would go to the staff office to do this. I said to the staff I wanted to see an Immigration Officer to discuss my case, but the staff were always dismissive. They would just say that they would try and see if they can talk to someone, but nothing ever happened. Immigration would only ever see you when they wanted to, and that was always just to give you a form or something like that.

113. I do not feel like anyone cared about whether detainees had any complaints. Why should they care? It is a very unpleasant job to have to do. So many cannot wait to leave and go work somewhere else. They are frustrated and they take their frustration out on the detainees. Their job is just to keep detainees alive, it does not matter how you do it, the main thing is just to make sure they are alive so they can be removed. They do not care about whether detainee's welfare is looked after or that they eat well or don't feel depressed, it's not important to them.

### **Legal Proceedings**

114. I brought judicial review proceedings to challenge the lawfulness of the removal and the detention. On the 25<sup>th</sup> of January 2018, after many months of opposing my claim the Home Office agreed that they had acted in breach of EU law and that I had been detained unlawfully at Brook House throughout. However, they said that I was only entitled to nominal damages (£1.00.) and so the detention claim was transferred to be heard as a civil action for damages for false imprisonment, assault and the conditions in which I was held all of which caused me to suffer psychiatric damage. This was also said to breach my fundamental rights under Article 3 and 8 ECHR. Having again contested my claims for a further 2 years and just before the trial on the 1<sup>st</sup> June 2020 the Home Office conceded that I was entitled to substantial damages for breach of my EU law rights and the false imprisonment. They proposed and I agreed that the rest of my claim be stayed pending this Inquiry.

115. I agreed to this because I was very concerned that the Home Office had not really been held to account for unlawfully detaining me and putting me in such appalling conditions. I certainly had nothing to suggest that they had really understood how damaging this

experience was for me and that they would be taking any steps to change their practices so this did not happen again to someone else. They seemed to me to only concede when they had no other option to avoid the hearings, they have not apologised to me and I am not aware that any individual in the Home Office has faced any investigation or been held to account for the unlawful treatment and no action has been taken. Even though I gave a detailed account of being assaulted by G4S staff there was never any action to investigate this. I was not approached by the Home Office after the Panorama programme. It seems to me that the Home Office did not really take my legal claims seriously and have still not given my basic rights any respect. This has shocked me. I have always thought that the United Kingdom was place where the law and rights were highly respected and valued. That it would be treated as a big issue if people were treated unlawfully by the government but that has not been my experience of the Home Office's attitude to the Court and the law. I hope the Inquiry can change this and stop anybody else being abused and their lives destroyed as mine was.

### **Impact of Detention Post-Release**

116. I was released on 24<sup>th</sup> July 2017 after spending 88 days in detention. My life and the person I am was changed forever. I was changed physically. I had lost weight and the strength I had built up before being detained was now no longer there. I could not bear to look at my body in the mirror. I was also mentally exhausted and broken. I was withdrawn and had no enjoyment in any of things I previously used to do. I felt that being detained and the conditions I was put in have destroyed my life. Every time I heard a loud noise, I felt agitated as it reminds me of the sound that I would hear in Brook House and this brings back memories of my time in there. Whilst sleeping, the slightest of noise wakes me up at night. I still feel frightened. I experience severe flashbacks to my time in detention. I have been prescribed anti-depressants and referred for counselling.

117. A joint report was prepared for my civil claim. Both psychiatrists have concluded that I developed a psychiatric disorder because of the detention and treatment in detention. There is a disagreement about the severity of the psychiatric disorder I have but both agree a "Mixed Anxiety and Depressive State with PTS features". The difference

between the two psychiatrists is that Professor Elliot's opinion is that if my account of the experiences in the detention centre are true, this was likely to be psychologically traumatic and threatening to me over a prolonged period and the criteria for PTSD is met. I can say categorically that detention at Brook House was both psychologically traumatic and threatening throughout and in so many different ways which I have tried to explain as best I can to this Inquiry.

<b><u>Statement of Truth</u></b>	
<p>I believe that the facts stated in this witness statement are true. I understand that proceedings for contempt of court may be brought against anyone who makes, or causes to be made, a false statement in a document verified by a statement of truth without an honest belief in its truth.</p> <p>I am content for this witness statement to form part of the evidence before the Brook House Inquiry and to be published on the Inquiry's website.</p>	
Name	<b>D1851</b>
Signature	<b>Signature</b>
Date	19 November 2021