

<p>1 Wednesday, 1 December 2021</p> <p>2 (10.00 am)</p> <p>3 MR CALLUM MICHAEL TULLEY (continued)</p> <p>4 Examination by MR ALTMAN (continued)</p> <p>5 MR ALTMAN: Mr Tulley, before I move on, I understand that</p> <p>6 overnight you refreshed your memory about three</p> <p>7 incidents about which I asked you yesterday, and they</p> <p>8 are the incidents I was asking you about where we saw</p> <p>9 the use of the word "snitch" or "grass", as case may</p> <p>10 be -- one involving a colleague, Dan Lake; the other,</p> <p>11 Gary Groucher, and another, Ginge.</p> <p>12 A. Yes, sir.</p> <p>13 Q. Having refreshed your memory, what can you tell us,</p> <p>14 then, very briefly about the Dan Lake incident, and I'm</p> <p>15 not going to take us to the transcripts -- we looked at</p> <p>16 them yesterday -- to save time, but what do you</p> <p>17 remember?</p> <p>18 A. DCO Lake was talking about a new member of staff that</p> <p>19 he'd been talking to, and the new member of staff was</p> <p>20 telling him that, on their training course, they were</p> <p>21 encouraged to report any poor behaviour by staff, which</p> <p>22 Lake referred to as "grassing" or "snitching", but he</p> <p>23 said that the new member of staff was reassuring Lake</p> <p>24 that he was not a snitch and he would never snitch</p> <p>25 unless it would directly put his job at risk, and so --</p> <p>Page 1</p>	<p>1 transcript, but, given I didn't know much about it, it</p> <p>2 was hard to confirm what it was about, but that's what</p> <p>3 it was about.</p> <p>4 Q. And, finally, the Groucher transcript, we remember. Was</p> <p>5 that about a detained man grassing a member of staff?</p> <p>6 A. Yes, sir, that was as shown in the transcripts.</p> <p>7 Groucher was informing me about DCOs falling asleep on</p> <p>8 constant supervisions during night shifts and that</p> <p>9 greater care should be shown because detainees snitch on</p> <p>10 staff as well.</p> <p>11 Q. Thank you very much for that.</p> <p>12 Back to your witness statement, please, and I have</p> <p>13 it open at page 47, at paragraph 188. I want to ask</p> <p>14 you, please, some more about healthcare, ACDT and Adults</p> <p>15 at Risk policies, which we have not yet mentioned.</p> <p>16 First of all, what level of insight did you have</p> <p>17 into the operation of healthcare at Brook House?</p> <p>18 A. Obviously, I didn't work in healthcare, sir, so it was</p> <p>19 limited. My understanding of healthcare is that they</p> <p>20 were understaffed. I had no knowledge if they were</p> <p>21 contractually understaffed, but they simply did not have</p> <p>22 the staff members to meet the needs of the detainees,</p> <p>23 particularly given how many medical responses there</p> <p>24 would often be due to instances of drug misuse or</p> <p>25 self-harm.</p> <p>Page 3</p>
<p>1 I mean, really, it just -- the conversation that Lake</p> <p>2 was telling me about just showed the culture of</p> <p>3 snitching in the centre and how quickly that -- the</p> <p>4 culture around snitching, or raising concerns, in the</p> <p>5 centre and how quickly new staff got wind of that and</p> <p>6 their efforts to assimilate.</p> <p>7 Q. So that was Dan Lake. The other one we remember,</p> <p>8 I think the first of the three which I asked you about</p> <p>9 yesterday, was the Ginge one relating to Babs, who we</p> <p>10 thought was Babatunde.</p> <p>11 A. Yes, sir.</p> <p>12 Q. Tell us about that. What do you remember about that?</p> <p>13 A. Having rewatched the footage and sort of understanding</p> <p>14 a bit more about the context, Ginge was telling me that</p> <p>15 Babs had been abused, racially, by a detainee and that</p> <p>16 he was abusive back towards the detainee in some form or</p> <p>17 another, that that detainee made a complaint. The</p> <p>18 inference that I got from staff, from Ginge, was that</p> <p>19 that complaint had been corroborated by a member of</p> <p>20 staff. Because I suggested to Ginge that a member of</p> <p>21 staff would not be suspended just on the word of</p> <p>22 a detainee, and there seemed to be some agreement there</p> <p>23 and some comments from Ginge and another DCO, whose name</p> <p>24 I can't remember, around "No-one likes a snitch".</p> <p>25 So it was not far from what we saw yesterday on the</p> <p>Page 2</p>	<p>1 So I knew the healthcare department to be</p> <p>2 overworked, understaffed, stretched. Detainees were</p> <p>3 often very frustrated with healthcare. Sometimes they</p> <p>4 would complain about not getting their medication. You</p> <p>5 know, I had sympathy -- a lot of sympathy for the</p> <p>6 healthcare staff because there were so few of them and</p> <p>7 they had to see to the needs of, you know, over</p> <p>8 400 detainees.</p> <p>9 Q. Were you aware of any support, psychological support,</p> <p>10 for detained men?</p> <p>11 A. I was never really aware of this, to be honest; maybe,</p> <p>12 because I didn't work in healthcare, I was just simply</p> <p>13 unaware of it and it may have existed, but it wasn't</p> <p>14 visible.</p> <p>15 If we had concerns about the mental health of</p> <p>16 a detainee, there wasn't sort of a mental health</p> <p>17 specialist or a way of raising concerns about the</p> <p>18 health, mental health, of detainees. I wasn't aware of</p> <p>19 any sort of mental health provisions that were made for</p> <p>20 the detainees, sir.</p> <p>21 Q. Did you understand anything about an Adults at Risk</p> <p>22 policy that operated at Brook House?</p> <p>23 A. This policy rings a bell, but I can't recall much</p> <p>24 information about it.</p> <p>25 Q. Were you trained on it?</p> <p>Page 4</p>

1 **A. It's possible, probable, that we were trained on it, but**
 2 **given the passage of time, I've forgotten about it.**
 3 Q. You mentioned before the ACDT form that would be
 4 completed when you were supervising --
 5 **A. Yes, sir.**
 6 Q. -- somebody on E wing. This was, what, just an ordinary
 7 document which set out time, date, and you completed
 8 observations?
 9 **A. Yes, sir. It was an orange booklet, and anyone could**
 10 **open one, any member of staff. So if you -- I think**
 11 **I recall opening some -- I opened one -- I remember one**
 12 **detainee telling me that he was feeling particularly**
 13 **low, and I opened up an ACDT, I think. To my**
 14 **recollection, you write the detainee's name in, you**
 15 **write in why you've opened up the ACDT and then you**
 16 **advise a manager, probably the Oscar One. It's such**
 17 **a long time ago since I opened one myself. But they**
 18 **were forms which were used to monitor detainees that**
 19 **staff were -- who staff were aware were at risk of**
 20 **self-harm or suicide.**
 21 Q. The discretion was entirely yours, so even a DCO could
 22 make the decision whether or not to open an ACDT form?
 23 **A. Yes, sir.**
 24 Q. And if you didn't want to, you wouldn't do it?
 25 **A. Yes, sir, or if you simply didn't believe the detainee,**

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1 **you were under no obligation to -- I mean, unless it was**
 2 **sort of an explicit --**
 3 Q. Unless ...?
 4 **A. Unless it was an explicit -- you know, the detainee had**
 5 **told you that he was going to harm himself or he was**
 6 **going to take his own life. I mean, besides that,**
 7 **I don't think there was any sort of obligation to open**
 8 **an ACDT if you didn't want to or if you didn't believe**
 9 **the detainee's mental health deterioration to be**
 10 **sincere.**
 11 Q. Did you ever have any disagreements with anybody else
 12 about whether such a form should be opened as regards
 13 a particular detained man?
 14 **A. Well, whenever I opened an ACDT, sir, I never consulted**
 15 **anybody else, I just did it. So I was never told not to**
 16 **open an ACDT. Equally, no-one ever came to me and asked**
 17 **me, "Oh, this detainee said this. I don't want to open**
 18 **an ACDT. What do you think?"**
 19 Q. How does it work? Let's just think for a moment. You
 20 have been on the wing and a particular detained man has
 21 told you he's in low mood, or he feels that he might
 22 self-harm, or he's depressed, or any such other
 23 sentiment is expressed to you, and you decide to open an
 24 ACDT form. How do you know an ACDT form doesn't already
 25 exist in relation to that man?

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1 **A. In the DCM's Oscar One office, there is a notice board**
 2 **with a list of every detainee that's on an ACDT.**
 3 Q. Yes.
 4 **A. So I think, if you were -- if you wanted to open an**
 5 **ACDT, you would -- you would sort of go and get one and**
 6 **fill it out and then you'd take it to the Oscar One**
 7 **office. Maybe they'd have to sign it or something.**
 8 **You'd certainly need to inform the manager at some**
 9 **point, because it would need to be monitored not just by**
 10 **you, but by the wing officers, the DCMs. So if you went**
 11 **to the wing office and -- if you went to the DCM office**
 12 **to ask -- to let them know, then it would become**
 13 **apparent to you if that detainee was already on an ACDT.**
 14 Q. And if that detained man was already on ACDT, would you
 15 be opening a new form?
 16 **A. No, sir, but you would make an observation in the ACDT**
 17 **that already existed. So if I was -- if I wanted to**
 18 **open an ACDT about a detainee who told me he felt like**
 19 **he was going to self-harm, and I found out that the**
 20 **detainee was already on an ACDT, I would write an**
 21 **observation in his ACDT myself, whether it's being**
 22 **stored in the wing office, or wherever else, and I would**
 23 **write that in the observations.**
 24 Q. So, in an ideal world, there shouldn't be more than one
 25 form open for any one detained man?

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1 **A. Yes, sir, I believe so.**
 2 Q. How were they closed?
 3 **A. An assessment by the DCM.**
 4 Q. What kind of assessment would that be?
 5 **A. A conversation, a chat. I sat in on a couple of these**
 6 **conversations. Sometimes, I think it was good practice**
 7 **for DCMs to have someone else who was witness to the**
 8 **conversation, so they couldn't be seen to be closing it**
 9 **unjustifiably or continuing it without reason either,**
 10 **and the DCM would ask them how they're feeling, do they**
 11 **feel like -- you know, want to self-harm or hurt**
 12 **themselves, "Are you feeling an improvement in your**
 13 **health? Are you eating more? How is your case going?"**
 14 **those kinds of questions. If, at the end of that**
 15 **conversation, the DCM felt that the detainee was no**
 16 **longer at sufficient risk of self-harm or suicide, then**
 17 **he'd be taken off the ACDT.**
 18 **There were instances when a detainee -- for example,**
 19 **I can recall one detainee who was on hunger strike for**
 20 **quite a long time, and he did begin to eat eventually,**
 21 **but the DCM didn't want to take it upon himself to take**
 22 **him off the ACDT, so there was consultation with**
 23 **healthcare in that instance, and so I think there were**
 24 **times when healthcare would be consulted about whether**
 25 **or not a detainee should continue on an ACDT.**

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2 (Pages 5 to 8)

1 Q. That's what I wanted to ask. What was the threshold for
 2 getting healthcare involved in what could be
 3 a significant decision in the life of a man who's being
 4 detained who may tell you something which provokes you
 5 to open a form but is perhaps not telling you the whole
 6 story?
 7 A. It's hard to say, sir. It's up to the DCM. Sometimes
 8 SMT members would conduct sort of a review of some of
 9 the more high-profile detainees on ACDTs -- perhaps
 10 those that had spent time on constant supervision or
 11 sort of prolific self-harmers. So it wasn't always and
 12 only a DCM and it wasn't always and only their decision
 13 to take a detainee off an ACDT. But, from my
 14 experience, it was most commonly left, most often left,
 15 to a DCM, who wasn't particularly qualified to assess
 16 the mental health of a detainee.
 17 Q. It all sounds a bit subjective, doesn't it?
 18 A. It requires judgment, sir, on the part of the -- whoever
 19 is assessing the detainee.
 20 Q. But it's subjective judgment, which could be proved
 21 wrong?
 22 A. Yes, sir.
 23 Q. Once the form was opened, did that also mean that person
 24 went to E wing?
 25 A. Not always, sir, no.

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1 Q. Once opened, did it mean that that person had to be
 2 constantly supervised?
 3 A. Not always, sir, no.
 4 Q. So in the instance of a man who did not find himself on
 5 E wing -- for example, somebody who was threatening to
 6 commit suicide and might be placed on E wing for
 7 constant supervision -- how does the ACDT form help the
 8 man in respect of whom it is opened on an ordinary
 9 residential wing?
 10 A. So if you were to open up an ACDT and alert the DCM that
 11 a detainee had told you something like, "I'm feeling so
 12 low. I don't think there's any point anymore. Life's
 13 becoming too much to bear", that's not a kind of --
 14 that's not a statement that says, "I will kill myself"
 15 or "I will harm myself", but it's an indication of how
 16 low they're feeling. So you may open up an ACDT and
 17 inform the Oscar One, the DCM, about those comments.
 18 That's what you would do, you would need to do, as part
 19 of opening up an ACDT. Also a member of the senior
 20 management team. Then it was the decision of either the
 21 DCM or someone in the senior management team to decide
 22 how often they needed to be observed. So would they
 23 need to go on a constant supervision or would they just
 24 need two-hourly, three-hourly, four-hourly obs --
 25 observations.

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1 Q. Off E wing, you mean on the ordinary --
 2 A. On the ordinary wing, sir, yes. So you might have five
 3 or six or seven ACDTs on D wing, for example, and the
 4 detainees may be on hourly obs, or two-hourly obs, which
 5 would require a member of staff to fill in -- to go and
 6 find the detainee somewhere in the detention centre and
 7 write down what they were doing at that time. You'd
 8 have to do it every hour, every two hours, every three
 9 hours or every four hours, depending on the risk that
 10 was -- the risk assessment.
 11 Q. In circumstances where you tell us that it was an
 12 ordinary situation where there was understaffing, how
 13 were officers to cope on the wing if there were, let's
 14 say, two men running a wing during the course of a shift
 15 when there were six or seven ACDTs open?
 16 A. Even if there were three DCOs on the wing, it's an
 17 insufficient number. If there's even three or four
 18 ACDTs, you know, if you've got -- you can't -- if you've
 19 got four ACDTs or three ACDTs on a wing and you've got
 20 three members of staff working on the wing, and there
 21 are two-hourly obs, the obs can't be all at the same
 22 time because that would take all of the members of staff
 23 away from their duties, so they'd have to be at sort of
 24 intervals. But you can't have staff running around just
 25 filling out ACDT forms. So either the ACDT form

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1 wouldn't be seen to and an observation wouldn't be made
 2 correctly or the DCO would have to neglect another area
 3 of their role, like seeing to the needs of the other
 4 100 detainees on the wing.
 5 Q. Yes.
 6 A. So three members of staff -- I understand that if --
 7 I understand that, contractually, G4S were required to
 8 have two or three members of staff on a wing, and often
 9 there was two members of staff, so, I mean, technically,
 10 contractually, I understand that they -- there was
 11 a sufficient number. But, in reality, it was
 12 a completely insufficient number because it was putting
 13 people at serious risk of harm.
 14 Q. As I've said more than once, we will come on to
 15 individual incidents a little later, and from
 16 paragraph 190 to paragraph 202 of your inquiry statement
 17 you deal with specific incidents, and, as I said, for
 18 various reasons, I deal with them towards the end. But,
 19 in general terms, I'd like you, please, to look at your
 20 paragraph 202. A little earlier, you say that you "felt
 21 it was irresponsible and dangerous to house the most
 22 vulnerable detainees on E wing along with some of
 23 the most difficult and non-compliant detainees".
 24 A. Yes, sir.
 25 Q. What kind of men were you talking about, in saying that?

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3 (Pages 9 to 12)

1 A. Well, I mean, it's -- I mean, first of all, I should say
2 that you can be vulnerable and challenging, and so that
3 causes some difficulty, but, to put it in the most
4 simple terms, if a detainee was particularly violent and
5 non-compliant -- perhaps he attacked another detainee or
6 attacked a member of staff; had a mental health problem
7 which meant he was unpredictable and irrational,
8 erratic -- he would be kept on E wing because he
9 wouldn't be able to leave the wing and, in theory, was
10 easier to manage.

11 But then the most vulnerable detainees -- for
12 example, I remember there was a detainee who was
13 suspected of being under 18. He's actually included in
14 the Panorama film.

15 Q. Is he the one with the baseball cap who was thought to
16 be about 14?

17 A. Yes, he says he was 14 and staff believed he was under
18 18 as well. He was kept on E wing. You know, you're
19 down there with some of the toughest people in the
20 prison, some of the most violent and some of the most
21 disturbed. I mean, as a 14-year-old, you know, to be
22 kept in the mad house where people are going crazy and
23 you've got people on constant supervisions trying to
24 harm themselves or take their own lives, I mean, it's no
25 place for someone -- it's no place for anyone, but it's

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1 certainly no place for someone that needs kind of more
2 care.

3 I mean, you think someone is under 18, so you put
4 them on E wing? I mean, what -- if you think someone is
5 under 18, you get them out of the detention centre, and
6 it should have been the same for other people who were
7 equally as vulnerable.

8 Q. While I have it in mind, and you come to this later, but
9 perhaps now is as good a time as any to ask you about
10 this, and I can point you to the paragraph number if you
11 need it in your statement. But in terms of mixing, here
12 we are talking about perhaps just one small part of
13 Brook House, E wing, about the mixing of different kinds
14 of people with different issues. Do you have a view
15 about mixing detained men who had no previous experience
16 of prison, were of good character, but, for one reason
17 or another, found themselves in Brook House, looking to
18 be removed from the country, and those men who were
19 time-served foreign national offenders? What was your
20 view about that particular mix of men in Brook House?

21 A. My view is that it was irresponsible and dangerous, and
22 although most foreign national offenders behaved just as
23 well as those without criminal backgrounds, there was
24 a minority of foreign national offenders that brought
25 with them to Brook House a prison-like mentality, did

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1 bring with them criminal behaviour that continued into
2 their time at Brook House, and that rubbed off on
3 detainees without criminal backgrounds and took focus
4 away from those detainees as efforts and time were
5 exhausted on those that were creating problems, and
6 I just didn't think it was healthy at all.

7 Q. Were they better, if you like, at playing the system?

8 A. Yes, they were. They were better at playing the system,
9 that's true. They were used to the environs of
10 a prison, so they were able to survive better, and
11 some -- sometimes foreign national offenders would
12 exploit those without criminal backgrounds or those who
13 were more vulnerable. Again, taking you back to the
14 18-year-old, he was used as a -- he was used as a --
15 before he was moved onto E wing, he was used as a drugs
16 guinea pig by his cellmate.

17 Q. What do you mean "as a drugs guinea pig"? We will come
18 across that idea with one of the other detained men,
19 1275. What do you mean --

20 A. To test spice on.

21 Q. How does that work? Why does somebody need to be used
22 to test spice on?

23 A. To see how the batch of spice that had been smuggled
24 into the prison would affect an inmate.

25 Q. Was that just rumour or was it known to happen? Did it

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1 come from him?

2 A. I was told by staff. I was told by Gary Groucher on the
3 E wing office. I think my notes and my video diaries
4 will indicate I was also told by another member of
5 staff. But I was certainly told it by at least one DCO.
6 I mean, the mixing of certain people with -- certain
7 foreign national offenders with people without criminal
8 backgrounds I also thought was just completely
9 irresponsible as well, for that kind of -- because of
10 that kind of thing.

11 Q. Let me move on, then, please. I think I've already
12 touched on rule 35 in the past, but let me ask you this:
13 how much did you understand, apart from your training,
14 but when you were on the job, about the application of
15 rule 35 and rule 40 and rule 42?

16 A. I can't remember much about rule 35, sir, but I think --
17 I might be getting this the wrong way around. I think
18 rule 40 meant you were removed from association and
19 placed onto E wing but not placed in solitary
20 confinement. My understanding was that rule 42 -- this
21 is to the best of my memory -- meant you would be placed
22 in solitary confinement.

23 Q. Who made those decisions?

24 A. DCMs and members of the senior management team.

25 Q. Based on, what, somebody's behaviour?

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4 (Pages 13 to 16)

<p>1 A. Yes, sir.</p> <p>2 Q. When somebody was placed on rule 40 or rule 42, did you,</p> <p>3 as a DCO, come to learn why that person had been so</p> <p>4 placed? In other words, did you understand what the</p> <p>5 underlying rationale was for it?</p> <p>6 A. Not always, sir.</p> <p>7 Q. Would it have helped if you had been told, do you think?</p> <p>8 A. Yes, sir.</p> <p>9 Q. Because?</p> <p>10 A. Because you knew sort of -- you might be able to offer</p> <p>11 better care for the detainee if you understand if he's</p> <p>12 down there because of a mental health problem, if you</p> <p>13 understand he's down there because of vulnerabilities.</p> <p>14 Q. And "down there" refers to what, E wing?</p> <p>15 A. E wing, yes, sorry.</p> <p>16 Q. All right. Let's move away from that, please, and ask</p> <p>17 you about use of force. You deal with these in two</p> <p>18 paragraphs -- at paragraph 204 and paragraph 205. You</p> <p>19 were involved, yourself, in uses of force. We see that</p> <p>20 on the programme and in some of the footage. What's the</p> <p>21 difference between unplanned use of force and a planned</p> <p>22 use of force?</p> <p>23 A. An unplanned use of force, or a spontaneous use of</p> <p>24 force, would arise if you witness a detainee</p> <p>25 self-harming or trying to take their own life or if you</p> <p style="text-align: center;">Page 17</p>	<p>1 Q. Who briefed the person who was to give authority?</p> <p>2 A. It would depend, sir. Staff would -- if staff -- if</p> <p>3 a DCO complained about -- that he was attacked by</p> <p>4 a detainee in his cell, then it would be on his word</p> <p>5 that the detainee would most likely be moved down to</p> <p>6 solitary confinement. If a detainee was refusing to be</p> <p>7 removed or deported, then whoever that detainee had the</p> <p>8 conversation with. But, I mean, SMT or DCMs would</p> <p>9 usually try and talk the detainee around before</p> <p>10 a planned use of force, and that's why planned uses of</p> <p>11 force were more preferable than unplanned ones, because</p> <p>12 you could offer the detainee multiple opportunities to</p> <p>13 comply before force was applied, whereas a spontaneous</p> <p>14 use of force didn't really allow for that.</p> <p>15 Q. In that instance of, you know, de-escalation, if you</p> <p>16 like, before a planned use of force had to be used,</p> <p>17 would the person speaking to the detained man tell him,</p> <p>18 "If you don't, we'll have to use force"? Would he be</p> <p>19 warned about that?</p> <p>20 A. Yes, sir, and if there was a planned use of force and</p> <p>21 you had to get kitted up and go to a detainee's cell,</p> <p>22 the detainee would be given -- you know, it wasn't like</p> <p>23 a DCM would just fling open the door and the people in</p> <p>24 riot gear would storm in and restrain him. You'd give</p> <p>25 him the opportunity -- you'd stand at the cell door,</p> <p style="text-align: center;">Page 19</p>
<p>1 witnessed a fight on the wing or if you were attacked by</p> <p>2 a detainee. So they were instances, essentially, when</p> <p>3 the use of force was -- the necessity for use of force</p> <p>4 was immediate, in that you did not have time to get</p> <p>5 kitted up into riot gear to engage in a use of force.</p> <p>6 But it was always preferred, if there was time to get</p> <p>7 kitted up, to get kitted up, because this was safer for</p> <p>8 staff and for the detainee, or at least seemed to be the</p> <p>9 case.</p> <p>10 Q. So, typically, as distinct from unplanned or spontaneous</p> <p>11 uses of force, typically, when would a planned use of</p> <p>12 force take place?</p> <p>13 A. If a detainee was refusing to be transferred or removed</p> <p>14 or deported, if a detainee was refusing to leave his</p> <p>15 cell to go to the solitary confinement block, if</p> <p>16 a detainee was refusing to return to their cell at the</p> <p>17 end of an association period.</p> <p>18 Q. That sort of circumstance?</p> <p>19 A. Well, essentially, any scenario in which you can plan</p> <p>20 the use of force in which -- and in which the use of</p> <p>21 force doesn't need to happen immediately, on the spot.</p> <p>22 Q. Who would sanction a planned use of force? At what</p> <p>23 level did it have to be sanctioned?</p> <p>24 A. At least at Oscar One level, sir. Probably senior</p> <p>25 management team.</p> <p style="text-align: center;">Page 18</p>	<p>1 you'd have an officer at the front of the door with the</p> <p>2 riot shield, then you'd have the three officers behind</p> <p>3 and then the DCM would give him one last opportunity to</p> <p>4 comply, and quite often, when the detainees were faced</p> <p>5 with three people in riot gear with a riot shield, they</p> <p>6 would then comply. If they didn't, then they'd be</p> <p>7 restrained.</p> <p>8 Q. Coming back to the briefing of the person who sanctioned</p> <p>9 the planned use of force, in your experience, if you</p> <p>10 have experience of it, was it done verbally or in</p> <p>11 writing?</p> <p>12 A. I don't really have experience of that, sir.</p> <p>13 Q. And the person who gave authority or sanctioned the use</p> <p>14 of force, did that go down in writing, the rationale</p> <p>15 underlying it, or did that all get written up later in</p> <p>16 a use of force form?</p> <p>17 A. It's hard to say, but I'd be surprised if it wasn't</p> <p>18 meant to have been sanctioned and given authority in</p> <p>19 writing before --</p> <p>20 Q. Before?</p> <p>21 A. Before.</p> <p>22 Q. All right. We will see what the documents show later.</p> <p>23 In terms of unplanned use of force, coming back to</p> <p>24 those spontaneous instances, were there circumstances</p> <p>25 where a DCM was asked to sanction, even fast-moving</p> <p style="text-align: center;">Page 20</p>

1 incidents, before any form of use of force was used, or,
 2 by definition, because they were fast moving or
 3 spontaneous, was no sanction required?
 4 **A. Well, at times you couldn't -- you know, if you're**
 5 **attacked or you see a detainee self-harming --**
 6 Q. You've got no time?
 7 **A. -- you've got no time to go and ask a DCM if you can use**
 8 **force. It's imperative that you do, especially when --**
 9 **you know, around the preservation of life. But I think**
 10 **it was always preferred that a DCM -- it was always**
 11 **preferred that a more senior person would sanction a use**
 12 **of force.**
 13 Q. Let's now ask you to talk us through a planned use of
 14 force; all right? The authority has been given.
 15 **A. Yes, sir.**
 16 Q. And you're on the team. What happens? Where does it
 17 all start? Do you get a briefing? Where do you kit up?
 18 What do you kit up into? Just talk us through a typical
 19 planned use of force step by step?
 20 **A. Well, as a DCO, you'd get a call on your radio and**
 21 **someone would say, "Callum, go and collect your kit from**
 22 **store cupboard".**
 23 Q. Pause there. What's the kit?
 24 **A. You'd make your way to the store cupboard and the kit**
 25 **would be a riot helmet.**

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1 Q. Right. And that's --
 2 **A. Sort of a --**
 3 Q. We have seen them in the footage?
 4 **A. Big helmet with a visor.**
 5 Q. And they have a net guard?
 6 **A. Yes, sir.**
 7 Q. And temple guards, presumably?
 8 **A. Yes, sir. Overalls, flame-retardant overalls which**
 9 **would cover the entirety of your body, flame-retardant**
 10 **gloves, arm pads, knee pads, steel-capped boots. If you**
 11 **were allocated as the shield officer, then you would**
 12 **pick up a riot shield.**
 13 Q. Were you ever a shield officer?
 14 **A. Yes, sir.**
 15 Q. So was that all part of the training we were asking you
 16 about yesterday --
 17 **A. Yes, sir.**
 18 Q. -- or the day before, whenever it was now?
 19 So all that time ago, you had shield training. Were
 20 you retrained in it during any refresher course?
 21 **A. Yes, sir.**
 22 Q. How to use it properly?
 23 **A. Yes, sir.**
 24 Q. So you've got helmet, the overalls, flame-retardant
 25 overalls, flame-retardant gloves?

Page 22

1 **A. Gloves.**
 2 Q. Knee protectors. Did you say elbow protectors?
 3 **A. Yes, sir.**
 4 Q. Steel-capped boots?
 5 **A. Yes, sir.**
 6 Q. What else?
 7 **A. I think those were the only things you'd have to wear.**
 8 **You could also -- there were balaclavas.**
 9 Q. Why would balaclavas be required?
 10 **A. Well, so the detainee didn't know who you were.**
 11 Q. Were they ever used?
 12 **A. Yes, sir. I used one myself once.**
 13 Q. Because?
 14 **A. There was a detainee who was -- there was a detainee who**
 15 **I had a good relationship with and we trained in the**
 16 **gym. He would seem just as British as, you know, you**
 17 **and me, and I think he was second-generation Windrush,**
 18 **grew up in London and ended up getting into gangs and he**
 19 **was never sort of sorted out with the correct**
 20 **documentation. So he ended up finding himself in**
 21 **a detention centre after his prison sentence.**
 22 **One day, I was called to get kitted up to restrain**
 23 **him. He was being deported back to Jamaica. And I --**
 24 **I didn't want him to recognise me because we had a good**
 25 **relationship and I felt guilt about the restraint, so**

Page 23

1 **I chose to wear a -- I chose to wear a balaclava.**
 2 Q. Okay. Thinking still about the kit, radios?
 3 **A. No, we took those off.**
 4 Q. Any other form of object that you could use as a weapon?
 5 **A. No, not that I can remember.**
 6 Q. Did any officer ever use a baton or anything like that,
 7 or a truncheon or anything like that?
 8 **A. No, sir.**
 9 Q. Were they available?
 10 **A. Batons weren't, no.**
 11 Q. Anything else that could be used to subdue somebody, or
 12 to strike them?
 13 **A. Not that I can remember, sir, no. No. I don't think**
 14 **so, no. I'd remember if there was.**
 15 Q. When you say you can't remember, you'd surely remember
 16 during your two and a half years?
 17 **A. Yes, no batons, no weapons, no.**
 18 Q. Where do you kit up?
 19 **A. In the staff room, sir.**
 20 Q. And the number of officers involved in a planned use of
 21 force kitting up, would that depend on the circumstances
 22 or was there always a fixed number for the team?
 23 **A. Sorry, can you repeat your question, sir?**
 24 Q. Would there always be a fixed number for the team of
 25 officers who were going to be involved in the planned

Page 24

6 (Pages 21 to 24)

<p>1 use of force, or would it depend on the individual</p> <p>2 circumstances, how many were involved in the actual use</p> <p>3 of force, going into the cell?</p> <p>4 A. Oh, I see. I didn't have much insight into why teams</p> <p>5 were assembled.</p> <p>6 Q. No. Thinking about your own experience, were the</p> <p>7 numbers always the same or did they vary? Might there</p> <p>8 be five on one day, seven on another?</p> <p>9 A. There was usually four, sir, but if the detainee had</p> <p>10 a reputation for being able to kind of overwhelm</p> <p>11 officers or evade removal, then maybe you would have</p> <p>12 more than four DCOs kitted up.</p> <p>13 Q. Did anyone have handcuffs?</p> <p>14 A. Yes, sir.</p> <p>15 Q. Who would have the handcuffs?</p> <p>16 A. The fourth officer, sir. So you'd have the shield</p> <p>17 officer, you'd have two arm officers -- one for the left</p> <p>18 arm, one for the right arm -- and then you'd have</p> <p>19 a handcuff officer.</p> <p>20 Q. So that's the team of four. So you're saying one</p> <p>21 shield?</p> <p>22 A. Yes, sir.</p> <p>23 Q. Two other officers -- one to literally take the left</p> <p>24 arm, the other to take the right?</p> <p>25 A. Yes, sir.</p> <p style="text-align: center;">Page 25</p>	<p>1 The two teams would keep rotating until the restraint</p> <p>2 was complete or the detainee had evaded removal or</p> <p>3 deportation, for example."</p> <p>4 A. Yes, sir.</p> <p>5 Q. So --</p> <p>6 A. That's correct.</p> <p>7 Q. Did you have any experience of that, that kind of</p> <p>8 situation --</p> <p>9 A. Yes.</p> <p>10 Q. -- where more than one team was required?</p> <p>11 A. Yes, it was rare, but it happened.</p> <p>12 Q. In what kind of instance did it tend to happen?</p> <p>13 A. As I said in the statement, sir, if the detainee was --</p> <p>14 if the restraint was lasting a long time, the</p> <p>15 detainee -- if the team of four weren't getting anywhere</p> <p>16 with the detainee and the officers were becoming tired,</p> <p>17 then the other DCOs would take over the restraint.</p> <p>18 Q. But that would be planned in advance, so you would know</p> <p>19 what you were dealing with --</p> <p>20 A. Yes, sir.</p> <p>21 Q. -- because you couldn't, presumably, just muster another</p> <p>22 team of four?</p> <p>23 A. Yes, sir, you'd have a briefing, the assessment would be</p> <p>24 made on the detainee's past.</p> <p>25 Q. And the briefing would take place, what, just before you</p> <p style="text-align: center;">Page 27</p>
<p>1 Q. And then the one behind, in a sort of diamond shape,</p> <p>2 would have the handcuffs, so once the man is subdued,</p> <p>3 handcuffs are applied?</p> <p>4 A. Yes, sir.</p> <p>5 Q. Is that the way it worked?</p> <p>6 A. Yes, sir.</p> <p>7 THE CHAIR: Mr Tulley, would you like to take a five-minute</p> <p>8 break?</p> <p>9 A. No, no, it's okay.</p> <p>10 THE CHAIR: Are you sure?</p> <p>11 A. Yes. Thank you, chair.</p> <p>12 MR ALTMAN: Were there occasions when you would have more</p> <p>13 than one team of four? In other words, you'd have</p> <p>14 another team coming in to replace or on some form of</p> <p>15 rotation, if necessary? I'm simply looking at what you</p> <p>16 say at the end of your paragraph 205.</p> <p>17 A. Sorry, sir.</p> <p>18 Q. Let me read it to you:</p> <p>19 "If there was concern that a detainee would overcome</p> <p>20 four officers, additional officers would be allocated to</p> <p>21 the restraint. In some cases, two teams of four</p> <p>22 officers were allocated to the restraint of one</p> <p>23 detainee. If the first team of officers struggled or</p> <p>24 failed to effectively restrain a detainee for any given</p> <p>25 reason, then the other four officers would take over.</p> <p style="text-align: center;">Page 26</p>	<p>1 form up and march out, as it were?</p> <p>2 A. Yes, the briefing would take place, yes, in the staff</p> <p>3 room, sir.</p> <p>4 Q. And given by?</p> <p>5 A. The DCM or a member of the SMT, sir.</p> <p>6 Q. Would it be recorded, the briefing?</p> <p>7 A. Yes, sir.</p> <p>8 Q. In what form?</p> <p>9 A. With a body-worn camera, sir.</p> <p>10 Q. And also go on paper or would there be a script? We</p> <p>11 have seen a script for a briefing certainly in some of</p> <p>12 the forms, but was that typically done or was it simply</p> <p>13 done on a body-worn camera?</p> <p>14 A. I don't know if it was done at the time or if it was</p> <p>15 transcribed off the back of the body-worn camera</p> <p>16 footage.</p> <p>17 Q. As I say, we will certainly see one script and, if needs</p> <p>18 be, we can ask you about that.</p> <p>19 Afterwards, whether it was planned or unplanned,</p> <p>20 were all staff involved in the use of force obliged to</p> <p>21 fill out a report, a DCF2, use of form report, or at</p> <p>22 least you would provide --</p> <p>23 A. If you used force, you'd have to fill out a use of force</p> <p>24 report, yes, sir.</p> <p>25 Q. And different people would contribute to this form. You</p> <p style="text-align: center;">Page 28</p>

7 (Pages 25 to 28)

<p>1 would fill out your part of a report which would all go</p> <p>2 into the overarching report; is that right? You would</p> <p>3 set out what you had done and seen?</p> <p>4 A. Yes, sir.</p> <p>5 Q. In your section of the report?</p> <p>6 A. Yes, sir.</p> <p>7 Q. And other officers involved would contribute to it?</p> <p>8 A. Yes, sir.</p> <p>9 Q. And there would be a cover sheet setting out the</p> <p>10 circumstances, there were tick boxes, and we will look</p> <p>11 at one or two of these forms later as well. All right.</p> <p>12 Are you all right, Mr Tulley?</p> <p>13 A. Yes, sir.</p> <p>14 Q. Are you sure?</p> <p>15 A. Yes.</p> <p>16 Q. You know you can ask for a break any time you want.</p> <p>17 A. Appreciate it.</p> <p>18 Q. Now, I asked you -- moving on, I asked you yesterday,</p> <p>19 and I think possibly the day before, about complaints</p> <p>20 and raising concerns, and you've given quite a bit of</p> <p>21 evidence about complaints. One of the things you say in</p> <p>22 your paragraph 206 is about complaints by detainees. So</p> <p>23 this is a slightly different topic. And that there was</p> <p>24 a form that detainees could fill out if they had</p> <p>25 a complaint about something. Were you ever aware,</p> <p style="text-align: center;">Page 29</p>	<p>1 Were you alive to that paragraph?</p> <p>2 A. What paragraph is that, sir?</p> <p>3 Q. (4):</p> <p>4 "Detainee custody officers shall notify the</p> <p>5 healthcare team of any concern they have about the</p> <p>6 physical or mental health of a detainee."</p> <p>7 Is that something that was adhered to by officers,</p> <p>8 complied with?</p> <p>9 A. Sometimes I'm sure it was, sir; other times, I very much</p> <p>10 doubt it. I mean, even if you wanted to, the healthcare</p> <p>11 team were so overworked and overstretched that it was</p> <p>12 sometimes hard to sort of -- they were unapproachable,</p> <p>13 they were hard to access at times. Sometimes you'd go</p> <p>14 to healthcare to speak to someone from the department,</p> <p>15 a nurse, and you'd -- there'd be no-one there because</p> <p>16 they'd be responding to incidents. So it wasn't always</p> <p>17 possible to access someone from the healthcare team,</p> <p>18 sir.</p> <p>19 Q. I have moved away, obviously, from complaints by</p> <p>20 detainees, but I just wanted to make sure I asked that,</p> <p>21 because we have been asked to ask you that.</p> <p>22 Moving back to where I was, were you, yourself, the</p> <p>23 subject of a complaint?</p> <p>24 A. Yes, sir. Yes, sir.</p> <p>25 Q. Just tell us briefly what that was about?</p> <p style="text-align: center;">Page 31</p>
<p>1 yourself, of detainees making complaints?</p> <p>2 A. Not about other staff members, sir, particularly.</p> <p>3 Q. Were you aware --</p> <p>4 A. They made complaints constantly in an unofficial</p> <p>5 capacity.</p> <p>6 Q. By which you mean?</p> <p>7 A. About the food, about the treatment, about not being</p> <p>8 released, about constantly being held there.</p> <p>9 Q. Can I ask you one other thing about -- do you remember</p> <p>10 we looked at rule 45?</p> <p>11 A. Yes, sir, briefly, yes.</p> <p>12 Q. I just need to try to remember where I've stuck it.</p> <p>13 A. I think we looked at it in the undercover operative</p> <p>14 protocols.</p> <p>15 Q. Can we put up on screen <CPS000025>. If my memory</p> <p>16 serves me, it's on the first page, on page 1 and 2. If</p> <p>17 we look at the bottom, we have got "General duty of</p> <p>18 officers". We looked at that yesterday. If we can just</p> <p>19 go to the next page, please, at the top, the one I have</p> <p>20 is in mind, and before I forget, one of the sections or</p> <p>21 paragraphs I didn't take you to yesterday or the day</p> <p>22 before was subparagraph (4), or paragraph (4):</p> <p>23 "Detainee custody officers shall notify the</p> <p>24 healthcare team of any concern they have about the</p> <p>25 physical or mental health of a detainee."</p> <p style="text-align: center;">Page 30</p>	<p>1 A. I was working in the library, and I was preoccupied with</p> <p>2 some work and a detainee tried to take my keys from</p> <p>3 behind me.</p> <p>4 Q. Yes.</p> <p>5 A. I turned around and told him to get back, to go away.</p> <p>6 This was on the CCTV footage which G4S later reviewed,</p> <p>7 as did Sussex Police after the complaint. What happened</p> <p>8 was, I told the security team that the detainee had</p> <p>9 tried to take my keys. The detainee was then moved to</p> <p>10 solitary confinement, or E wing at least. As</p> <p>11 a consequence of that, the detainee accused me of</p> <p>12 assaulting him. But when Sussex Police and G4S came in</p> <p>13 and reviewed the footage, it was so quickly -- the</p> <p>14 allegation was so quickly found to be baseless that it</p> <p>15 was very quickly resolved.</p> <p>16 Q. Moving on from there, disciplinary action against staff.</p> <p>17 Do you have any direct knowledge of any disciplinary</p> <p>18 action taken against staff during the relevant</p> <p>19 period -- April through to July, in your case?</p> <p>20 A. Besides those that were sacked and suspended as</p> <p>21 a consequence of the programme, no, sir.</p> <p>22 Q. You helped us early on with facilities at Brook House.</p> <p>23 Can you remember you told us all about the toilets, your</p> <p>24 views about the rooms and the other fixtures and</p> <p>25 fittings. One thing I haven't asked you, but I will</p> <p style="text-align: center;">Page 32</p>

<p>1 now, is, and you will have had, I'm sure, experience of</p> <p>2 this: what was the internet like and access to the</p> <p>3 internet like at Brook House?</p> <p>4 A. It was – the internet was a bit of a joke, really, at</p> <p>5 Brook House. There were a couple of email sites that</p> <p>6 worked. I think it was – the Gmail certainly worked,</p> <p>7 Outlook worked, I think, but, I think I've got this the</p> <p>8 right way around, I think it was Yahoo! Mail that didn't</p> <p>9 work.</p> <p>10 Q. If you are looking for the paragraph, it's 217.</p> <p>11 A. Yes, yes:</p> <p>12 "However, detainees often complained that Yahoo!</p> <p>13 Mail was blocked."</p> <p>14 You know, it was a source of frustration for</p> <p>15 detainees when they couldn't access sites or they</p> <p>16 couldn't access their emails because, of course, they</p> <p>17 wanted to work on their immigration cases. I mean,</p> <p>18 there were often times when the internet failed entirely</p> <p>19 and detainees couldn't get any work done, regardless of</p> <p>20 whether they were on Gmail, Yahoo! or Outlook.</p> <p>21 Q. What was the problem with the internet? Was it</p> <p>22 deliberately switched off or was it just a general</p> <p>23 failure, or what?</p> <p>24 A. The internet for the staff was fine. You know, it was</p> <p>25 absolutely fine. You had free access to everything on</p> <p style="text-align: center;">Page 33</p>	<p>1 system or was it just an open system that they could use</p> <p>2 without having to log in? In other words, if they, for</p> <p>3 example, wanted to email their solicitors, how were they</p> <p>4 able to do that?</p> <p>5 A. So to access the computers in the IT room, they would</p> <p>6 enter the IT room. Me or another activities officer</p> <p>7 would be sat behind a desk. They'd give me their card.</p> <p>8 I would then allocate them a computer to use, if there</p> <p>9 was one available. I'd unlock the computer from behind</p> <p>10 my desk and then they could – they were free to use the</p> <p>11 computer.</p> <p>12 Q. On what basis, what system were they able -- you</p> <p>13 mentioned Outlook a little earlier. Were they given</p> <p>14 Outlook addresses which they could use?</p> <p>15 A. No, sir, it was on them to create their own email</p> <p>16 accounts.</p> <p>17 Q. So it was up to them how they emailed their solicitors</p> <p>18 and remained in touch and, whatever system they used,</p> <p>19 they would log into it, presumably --</p> <p>20 A. Yes, sir.</p> <p>21 Q. -- and use those addresses to communicate?</p> <p>22 A. Yes, sir.</p> <p>23 Q. We have mentioned spice from time to time.</p> <p>24 A. Yes, sir.</p> <p>25 Q. And you deal with the drugs problem from paragraph 218</p> <p style="text-align: center;">Page 35</p>
<p>1 the staff computers. So I don't know why the internet</p> <p>2 was so bad for the detainees. I don't know who was</p> <p>3 behind it. We certainly had no control over it in the</p> <p>4 IT room.</p> <p>5 Q. Is that the only place where they could access the</p> <p>6 internet?</p> <p>7 A. Yes, sir.</p> <p>8 Q. How many monitors were there?</p> <p>9 A. There was usually about 19 working monitors, maybe 25.</p> <p>10 There was about 40 monitors in total, but, you know,</p> <p>11 many of them are broken, around half.</p> <p>12 Q. And the failure of the internet, access to the internet,</p> <p>13 was that a regular occurrence?</p> <p>14 A. Well, the difficulty in accessing most of the internet</p> <p>15 was constant, besides a few websites. The failure of</p> <p>16 the internet entirely was common, but quite often it</p> <p>17 didn't -- it wasn't -- it didn't completely fail.</p> <p>18 Q. Were there photocopiers that the men could use,</p> <p>19 scanners, fax machines, even?</p> <p>20 A. You could use fax machines freely on your wing.</p> <p>21 Q. Yes.</p> <p>22 A. But if you wanted to scan, I think you had to make an</p> <p>23 appointment with welfare, which was in high demand, so</p> <p>24 scanning wasn't particularly easy at Brook House.</p> <p>25 Q. Did the men have a credential for logging into the</p> <p style="text-align: center;">Page 34</p>	<p>1 onwards, over several paragraphs. During your time</p> <p>2 there with G4S, what was the availability of drugs like?</p> <p>3 A. The use of drugs was widespread. I mean, it would come</p> <p>4 in waves. Sometimes it would be more intense than</p> <p>5 others. But, I mean, the prevalence of spice was</p> <p>6 constant.</p> <p>7 Q. Was it just spice?</p> <p>8 A. Most often spice. Sometimes marijuana.</p> <p>9 Q. What do you know about spice?</p> <p>10 A. Spice is a kind of synthetic marijuana that, from my</p> <p>11 perspective, doesn't resemble that of someone who smokes</p> <p>12 marijuana. It didn't seem to sort of chill people out.</p> <p>13 It sent people crazy. I mean, people would fit and have</p> <p>14 seizures and vomit. On occasions, they'd become</p> <p>15 violent. The effect that spice -- you know, spice</p> <p>16 really had a big grip on Brook House a lot of the time.</p> <p>17 It exhausted healthcare, it was abused by -- spice was</p> <p>18 abused by detainees quite regularly. It was a real</p> <p>19 problem in the centre.</p> <p>20 Q. You talk about obviously the medical emergencies its use</p> <p>21 caused, which would have put a strain on the staff, who</p> <p>22 were already under strain, presumably?</p> <p>23 A. Yes, sir.</p> <p>24 Q. And you recall a particular example of Christmas Day in</p> <p>25 2016?</p> <p style="text-align: center;">Page 36</p>

<p>1 A. Yes, sir.</p> <p>2 Q. What was special about that day?</p> <p>3 A. Christmas Day in 2016, there were over 20 medical</p> <p>4 responses that were called for detainees who had smoked</p> <p>5 too much spice. I remember early on in the morning</p> <p>6 watching a detainee on D wing just lying in his own</p> <p>7 vomit. He'd smoked too much spice and was -- he'd just</p> <p>8 been sick everywhere. I mean, it was absolute chaos,</p> <p>9 Christmas Day in 2016. I mean, it was just -- yeah, it</p> <p>10 was mayhem, you know.</p> <p>11 Q. How was it getting in, Mr Tulley?</p> <p>12 A. No idea, sir. I mean, no idea. Never really found out.</p> <p>13 It was something I tried to sort of explore for Panorama</p> <p>14 when I was wearing secret cameras, but I could never</p> <p>15 really get anything out of anyone. I think staff didn't</p> <p>16 really -- most staff, as far as I was aware, didn't know</p> <p>17 how it was getting in. I mean, we weren't -- I was only</p> <p>18 searched once in the two and a half years that I was</p> <p>19 working at Brook House. That was on my third day</p> <p>20 wearing secret cameras, or second day. So it would have</p> <p>21 been easy for staff to smuggle drugs in, but I never saw</p> <p>22 any evidence of that.</p> <p>23 Q. You give the example that you have already told us about</p> <p>24 of the boy who was suspected to be 14 being used as</p> <p>25 a guinea pig for a much obviously wiser foreign national</p> <p style="text-align: center;">Page 37</p>	<p>1 issue of spice after we break, or would this be</p> <p>2 a convenient point --</p> <p>3 MR ALTMAN: No, I have truncated it, so if you have</p> <p>4 questions, chair, now is your opportunity.</p> <p>5 THE CHAIR: Okay. Mr Tulley, I just wonder if you could</p> <p>6 answer a question on that specifically for me. Do you</p> <p>7 remember any training that you underwent regarding</p> <p>8 submitting SIRs -- security information reports -- in</p> <p>9 relation to the use of drugs?</p> <p>10 A. Not in relation to the use of drugs, chair, but if we</p> <p>11 suspected that drugs were being held by a detainee in</p> <p>12 a cell or any part of the centre, then we would be</p> <p>13 required to submit an SIR, chair.</p> <p>14 THE CHAIR: And the same question, but in relation to any</p> <p>15 information that you may have had about how drugs were</p> <p>16 coming in. I think you've probably answered this in</p> <p>17 your comments to Mr Altman a few moments ago. But would</p> <p>18 you have understood that you could submit an SIR if you</p> <p>19 had information about how drugs may be --</p> <p>20 A. Oh, yes, chair, definitely.</p> <p>21 THE CHAIR: Were you ever asked any questions relating to an</p> <p>22 investigation about drugs? We talked about one incident</p> <p>23 yesterday -- instance, rather, yesterday. Anything else</p> <p>24 that you can remember in addition to that?</p> <p>25 A. Not in addition to that, chair, no.</p> <p style="text-align: center;">Page 39</p>
<p>1 offender, and you give in your statement, and I'm not</p> <p>2 going to go through them now, but if anybody is</p> <p>3 interested, 223 to 225, some other examples involving</p> <p>4 other detained men of the use of spice and the outcomes</p> <p>5 it has.</p> <p>6 A. Yes, sir.</p> <p>7 Q. You say at 230 -- and this is the last question I'm</p> <p>8 going to ask you, because I think the chair has some</p> <p>9 questions for you -- on the whole, you feel medical</p> <p>10 staff did their best in extremely testing and difficult</p> <p>11 circumstances to respond to the drug misuse in</p> <p>12 Brook House. Have you ever changed your mind about</p> <p>13 that, that they did their best in difficult, challenging</p> <p>14 circumstances?</p> <p>15 A. I don't think so, sir. On the whole, I thought the</p> <p>16 healthcare staff did the best they could, just from my</p> <p>17 observations.</p> <p>18 Q. All right.</p> <p>19 A. Of course, when we talk about the choke on D1527, we</p> <p>20 learn that --</p> <p>21 Q. We will come to that later.</p> <p>22 A. Yes.</p> <p>23 MR ALTMAN: Chair, you have a few questions, I understand.</p> <p>24 THE CHAIR: Thank you. Can I just clarify with you,</p> <p>25 Mr Altman, first, are we going to be returning to the</p> <p style="text-align: center;">Page 38</p>	<p>1 THE CHAIR: Thank you. I also have a question relating to</p> <p>2 the ACDT process. From your memory, did you understand</p> <p>3 that your role was in relation to carrying out</p> <p>4 observations on somebody who was on an ACDT, or did it</p> <p>5 relate to other activities, such as needing to have</p> <p>6 certain conversations with them or engage with them?</p> <p>7 A. As a DCO, you're mainly responsible for filling out</p> <p>8 observations. I think it was on the -- it was on the</p> <p>9 DCM to have those conversations about how they were</p> <p>10 doing and whether they were improving or not. I mean,</p> <p>11 I think your own observations as a DCO would possibly be</p> <p>12 taken into account by DCMs or members of the SMT when</p> <p>13 deciding whether or not to take someone off or keep</p> <p>14 someone on an ACDT. So it's not like you didn't have</p> <p>15 a bearing on the decision, but it just was never your</p> <p>16 decision.</p> <p>17 THE CHAIR: Okay. Thank you. And then my final question,</p> <p>18 in relation to wing and cell allocations: did you ever</p> <p>19 have any involvement in making decisions about where</p> <p>20 individual detainees would be placed? Was that done at</p> <p>21 a DCO level?</p> <p>22 A. That was done at a DCO level. I wasn't a wing officer,</p> <p>23 so those -- I never had to make those decisions, but</p> <p>24 DCOs and DCMs would decide which -- you know, where</p> <p>25 detainees would -- what cells detainees would go into</p> <p style="text-align: center;">Page 40</p>

<p>1 when they were admitted to a wing.</p> <p>2 THE CHAIR: In relation to that, do you ever remember an</p> <p>3 assessment of any type being conducted in relation to</p> <p>4 who could safely be kept in a shared space together, the</p> <p>5 equivalent of, like, a cell share risk assessment, that</p> <p>6 kind of documentation?</p> <p>7 A. Not that I'm aware of, chair, no. I mean, staff -- my</p> <p>8 experience was that most staff would try and keep</p> <p>9 nationalities together in cells, but any sort of form of</p> <p>10 assessment to judge the suitability of a detainee being</p> <p>11 held with another, I wasn't aware of, chair.</p> <p>12 THE CHAIR: One final question, my apologies. We talked</p> <p>13 about when there's a use of force and it is a planned</p> <p>14 use of force and that certain equipment and kit is put</p> <p>15 on, including helmets and overalls. When DCOs and DCMs</p> <p>16 are walking around the wings ordinarily, my</p> <p>17 understanding is that they would have a name badge on.</p> <p>18 A. A name badge?</p> <p>19 THE CHAIR: A name badge or something that identifies them</p> <p>20 to detainees. Is that correct?</p> <p>21 A. You would have your G4S pass that you would wear around</p> <p>22 your -- like a lanyard around your neck with your photo</p> <p>23 and your name on it, yes, chair.</p> <p>24 THE CHAIR: If you were wearing the necessary clothing to</p> <p>25 conduct a planned use of force, would that be visible?</p> <p style="text-align: center;">Page 41</p>	<p>1 "On 12 May 2017, a male detainee who said he was 14</p> <p>2 ... and who some staff believed was under the age of 18,</p> <p>3 was placed on E wing after being observed high on</p> <p>4 spice."</p> <p>5 You say you made a note of this on page 15 of one of</p> <p>6 your notes, <BBC000059>:</p> <p>7 "Staff told me they suspected that he had been used</p> <p>8 as a drugs guinea pig by the detainee he was housed with</p> <p>9 on A wing, who was a FNO [foreign national offender] who</p> <p>10 had a violent and aggressive nature."</p> <p>11 You remember being told that by an A wing officer</p> <p>12 and Gary Groucher, who was an E wing officer, at least</p> <p>13 at that time. I just want to pick up this, and this is</p> <p>14 all it is. In the same notebook, at page 18, you say:</p> <p>15 "Young Pakistani boy later taken away by social</p> <p>16 services."</p> <p>17 A. Yes, sir.</p> <p>18 Q. So it's the same boy whom you had noted up a couple of</p> <p>19 pages earlier in your notebook?</p> <p>20 A. Yes, sir.</p> <p>21 Q. We can see, thank you very much, the line is at the</p> <p>22 bottom:</p> <p>23 "Young Pakistani boy taken away by social services."</p> <p>24 Was that because of his age?</p> <p>25 A. Yes, sir. I think it's D852 on the cipher.</p> <p style="text-align: center;">Page 43</p>
<p>1 A. No, chair.</p> <p>2 THE CHAIR: So a detainee who was being restrained by</p> <p>3 a group of officers, would they be able to identify who</p> <p>4 those officers were, unless they happened to know them,</p> <p>5 visually?</p> <p>6 A. No, chair.</p> <p>7 THE CHAIR: Thank you very much.</p> <p>8 A. Of course, the accessibility of balaclavas meant that</p> <p>9 staff could restrain detainees without being identified,</p> <p>10 in any case. So even if detainees did see through your</p> <p>11 visor, if you were wearing a balaclava they wouldn't be</p> <p>12 able to know who you were. That's obviously -- that's</p> <p>13 why, particularly, I'm ashamed of the restraint of</p> <p>14 the Jamaican detainee, but it's relevant so I've said</p> <p>15 it.</p> <p>16 THE CHAIR: Thank you.</p> <p>17 MR ALTMAN: Chair, I'm going to ask for a slightly earlier</p> <p>18 break, if you wouldn't mind, today, but there is one</p> <p>19 further follow-up question, not from anything, chair,</p> <p>20 that you have asked, but one thing I wanted to ask you,</p> <p>21 and omitted to. Do you remember you told us about the</p> <p>22 boy?</p> <p>23 A. Yes.</p> <p>24 Q. You refer to him at paragraph 222 of your witness</p> <p>25 statement where you say:</p> <p style="text-align: center;">Page 42</p>	<p>1 Q. Thank you very much.</p> <p>2 A. Just so you know the name, sir.</p> <p>3 MR ALTMAN: Thank you very much.</p> <p>4 Chair, as I say, we are slightly early. When we</p> <p>5 come back from the break, and perhaps we might have</p> <p>6 20 minutes today, if you think that wise, I am going to</p> <p>7 ask you a little about your resignation and things that</p> <p>8 followed from that, and then we will come on to some of</p> <p>9 the incidents?</p> <p>10 THE CHAIR: Thank you very much. We will return, shall we</p> <p>11 say, at 11.25 am?</p> <p>12 MR ALTMAN: Yes.</p> <p>13 THE CHAIR: Thank you, Mr Tulley.</p> <p>14 (11.04 am)</p> <p>15 (A short break)</p> <p>16 (11.35 am)</p> <p>17 MR ALTMAN: Mr Tulley, you resigned from your position at</p> <p>18 Brook House, as you told us before, on 7 July 2017,</p> <p>19 having emailed the company, I think, the day before?</p> <p>20 A. Yes, sir.</p> <p>21 Q. It was agreed that your resignation would be with</p> <p>22 immediate effect. At the time, was G4S still unaware</p> <p>23 that you had been working for the BBC?</p> <p>24 A. Yes, sir.</p> <p>25 Q. You told us, obviously, about your time on the training</p> <p style="text-align: center;">Page 44</p>

<p>1 programme with the BBC. I'm not going to go over that 2 again.</p> <p>3 Afterwards, after the Panorama programme had aired, 4 did you have any contact with former detained men?</p> <p>5 A. Yes, sir.</p> <p>6 Q. You set that out in your statement, and I'm not going to 7 go through it. But if anybody is interested, it's at 8 paragraph 240 and onwards.</p> <p>9 Certainly there was one individual, who we know as 10 D275, who we will come to, who you went out to Tunisia 11 to visit?</p> <p>12 A. Yes, sir.</p> <p>13 Q. And interview?</p> <p>14 A. Yes, sir.</p> <p>15 Q. Was that for the programme?</p> <p>16 A. It was, sir, yes.</p> <p>17 Q. Can I ask you about staff, looking at your page 64.</p> <p>18 A. Yes, sir.</p> <p>19 Q. Was what happened and your part in it, in terms of 20 Panorama, well received by other members of staff at 21 Brook House?</p> <p>22 A. No, sir.</p> <p>23 Q. What did you meet by way of response from former staff 24 members, or other staff members who were still there?</p> <p>25 A. There were some positive messages on Facebook and</p> <p style="text-align: right;">Page 45</p>	<p>1 the managing director for G4S custodial services, more 2 senior than Ben Saunders, who was the centre director at 3 Brook House. He felt nothing was done. Indeed, nothing 4 was done.</p> <p>5 So we have kind of -- you know, we talk -- we would 6 talk from time to time and reflect on our experiences 7 and of course we are both similar in that we were 8 disturbed by the things we'd seen and feel an element of 9 guilt about our role in the system, and so, you know, 10 it's -- I take comfort from talking to Nathan because 11 he's someone who I can empathise with and who empathises 12 with me.</p> <p>13 Q. As you know, he's a witness in this inquiry, like you?</p> <p>14 A. Yes, sir.</p> <p>15 Q. We will be hearing from him. You have also made two 16 other witness statements -- let's just open them up -- 17 which you provided the inquiry as part of your exhibit 18 CT1. Chair, it's in the main bundle for you at flag 3. 19 For you, Mr Tulley -- don't bother going to the hard 20 copy. We have got one that's dated 27 August, which is 21 at <INQ000051>, page 33. We will just put that up on 22 screen for a moment, if we may.</p> <p>23 Here is a witness statement, and we can see the 24 header is "The Nursing & Midwifery Council". Just to 25 put this in context, this was to do with disciplinary</p> <p style="text-align: right;">Page 47</p>
<p>1 Twitter, but the majority were abusive. When I -- there 2 was a time -- it was around Christmas time on -- in 3 2017, maybe -- yeah, 2017, around Christmas, I think -- 4 perhaps it was 2018. I can't quite remember, sir.</p> <p>5 Q. You say in your statement 2017.</p> <p>6 A. Yes, sir. I was visiting -- I was home visiting family 7 for Christmas, and I was out with friends, and this was 8 about 2.00 in the morning, and I bumped into a DCO who 9 chased me -- I was chased home -- not chased home, but 10 chased down the road and jumped in a cab and got in 11 a cab home. So, you know, I was met with hostility, as 12 you'd expect, given the, you know, attitudes amongst 13 staff towards whistleblowing or grassing or snitching, 14 whatever you want to call it.</p> <p>15 Q. You name that officer in your statement as Sean Sayers?</p> <p>16 A. Yes, sir.</p> <p>17 Q. You have also had the occasional catch-up, as you call 18 it, with Nathan Ward, now Reverend Nathan Ward. Who was 19 he?</p> <p>20 A. He was a senior manager at G4S. He worked at 21 Tinsley House and Brook House. He was someone that had 22 concerns about the abusive culture and the treatment of 23 detainees at Brook House in particular; someone who 24 raised -- who did raise his concerns internally. 25 I understand he raised his concerns to Jerry Petherick,</p> <p style="text-align: right;">Page 46</p>	<p>1 proceedings taken against one of the Brook House nurses, 2 Jo Buss, who we will be thinking about a little in 3 a short while. This statement we can see is dated 4 27 August 2019.</p> <p>5 If we go to page 37 within this document, we see the 6 incident on 25 April is really the guts of what this 7 statement was all about and her part in it; yes?</p> <p>8 A. Yes, sir.</p> <p>9 Q. The other statement which you have supplied to the 10 inquiry is the one that we find at page 27 of this 11 collection of documents. We can see it is a witness 12 statement made in judicial review proceedings, one of 13 the claimants there being, you can just make it out, 14 ciphered as D1618, from whom we hope to be hearing on 15 Thursday afternoon. In this statement, typically, 16 without going through it, you are asked to, and did, 17 give an account about, really, the conditions of 18 detention at Brook House. That's really what the thrust 19 of that statement was about, and it's dated 20 13 December 2019, so you made two statements within 21 a matter of months for different reasons in 2019?</p> <p>22 A. Yes, sir.</p> <p>23 Q. If needs be, we will come back to them. Thanks. That 24 can be taken down.</p> <p>25 You also, for the sake of completeness, made</p> <p style="text-align: right;">Page 48</p>

<p>1 a witness statement to Sussex Police, and all of this 2 material, chair, I have asked to be adduced previously, 3 but just so everybody can see it, <SXP000120>. Chair, 4 this is in section A, behind divider 1 of your first 5 bundle. 6 There we have it. It is a statement that runs to 7 nine pages. It is a statement to Sussex Police, who 8 were investigating, in particular, the 25 April 9 incident. It is dated, as we can see, 23 November. 10 If we go to page 4, please, we can see that after 11 you go through some introductory matters, you deal with 12 individual incidents, beginning there with the one on 13 25 April. If we go to the penultimate page, on page 8, 14 you deal with events in May and June and July. 15 A. Yes, sir. 16 Q. Just for the sake of completeness, Mr Tulley, you made 17 a formal second statement -- I don't think we need to 18 put it up, but it is <SXP000118>. I don't want it put 19 up on screen. It is a very formal statement, setting 20 out some information about original diaries, you will 21 remember, dated 24 March 2018? 22 A. Yes, sir. 23 Q. Earlier in the course of your inquiry statement, you set 24 out a number of examples of incidents which you 25 highlighted as being evidence of misconduct or the</p> <p style="text-align: center;">Page 49</p>	<p>1 I could smell human faeces very strongly. It just hit 2 you as soon as you sort of walked onto the wing. 3 I was told by the wing officer, Gary Groucher, that 4 a detainee with known psychiatric problems was locked in 5 cell 2 and had covered his cell in his own excrement. 6 I looked into the cell via the glass viewing panel 7 on the door. The detainee, who I think was from 8 Eritrea, was walking around in circles in the middle of 9 the cell. He'd covered the walls, and himself, in his 10 excrement. He'd stuck lots of small pieces of paper to 11 the walls with his excrement. His demeanour was 12 non-threatening and his face was expressionless. 13 He didn't respond to anything I was saying. He was 14 just roaming around in circles in the middle of 15 the cell. 16 There were faeces on the floor, as well as the wall, 17 and bits on the door's viewing panel, which was making 18 it difficult for me to see in. 19 Not long after this, the detainee set off the fire 20 alarm in his cell. 21 Q. How did he do that? 22 A. I'm not quite sure. I think it could be triggered by 23 the kettle at times or smoking a cigarette, even. It 24 was quite easy to set off. Often, there were fire, kind 25 of, first responses -- kind of false alarms, because the</p> <p style="text-align: center;">Page 51</p>
<p>1 attitudes of staff towards detained men in a series of 2 instances or the treatment of vulnerable men in which 3 you provided other examples. I'm going to start, 4 please, by asking you to go back to paragraph 190 of 5 your witness statement, please, at page 48, because 6 I want to ask you about one incident about which you 7 provide quite a lot of information, and you've referred 8 to it in passing from time to time. It's an incident 9 for which we don't have footage, but it is one of 10 the earlier incidents which you mention before you 11 started filming -- in fact, long before you started 12 filming -- which you introduce as being an example of 13 staff showing little or no regard to issues around 14 self-harm, suicide or mental illness. You date it 15 6 March 2016, and you made a note of it in one of your 16 notebooks, which I don't make reference to. 17 What I'd like you to do is, first of all, tell us 18 about the incident itself, if needs be by reference to 19 your witness statement, in as much detail as you can, 20 and I'll stop you from time to time, perhaps, to ask you 21 the odd question. 22 A. I was working a normal shift, as far as I can remember, 23 as an activities officer. Because I was sports officer, 24 I had sort of the freedom to move around different parts 25 of the centre, and I went to E wing. Immediately,</p> <p style="text-align: center;">Page 50</p>	<p>1 fire alarms in the cells weren't difficult to set off. 2 Q. So we are clear, this man was -- he wasn't in one of 3 the observation cells, 7 or 8. He was in 2, but on 4 E wing? 5 A. Yes, sir. 6 Q. So a much smaller viewing panel? 7 A. Much smaller, very narrow. He was also locked behind 8 the door, so whilst he wasn't on the block, he wasn't in 9 solitary confinement, he was confined to his cell. 10 Q. Yes. 11 A. Anyway, he sets off the fire alarm and two DCMs 12 arrived -- DCM Graham Purnell and DCM Dave Roffey. 13 Q. Did they arrive in response to the fire alarm sounding? 14 A. Yes, sir. 15 Q. Presumably, there was a panel somewhere that would tell 16 them where the fire alarm had gone off? 17 A. Yes, sir. The detainee -- by the time that they had 18 arrived, the detainee had covered the viewing panel with 19 his faeces and with excrement, with tissue paper, and so 20 it was impossible to see into the cell. 21 I think DCM Roffey or DCM Purnell sent Gary Groucher 22 around the outside of the detention centre to look into 23 the window to see that it was safe to go in. 24 Q. Because it was, what, on the ground floor? 25 A. This was the ground floor, yes.</p> <p style="text-align: center;">Page 52</p>

<p>1 Q. In this instance, you were able to --</p> <p>2 A. Walk around the perimeter road, sir, and look in from</p> <p>3 the outside.</p> <p>4 Q. So we understand, were the windows clear or frosted?</p> <p>5 Could you see in from the outside?</p> <p>6 A. If you sort of went like that (indicating), you could</p> <p>7 see in.</p> <p>8 He said it was safe to go in, so Roffey or Purnell,</p> <p>9 I can't remember which one, opened the door, but they --</p> <p>10 they opened the cell door and they started making snide</p> <p>11 comments at the detainee. They started laughing at him.</p> <p>12 Q. First of all, what state was he in?</p> <p>13 A. He was -- if I recall correctly, he was completely</p> <p>14 naked. At this point, I think he was kind of shivering</p> <p>15 on his bed.</p> <p>16 Q. 194.</p> <p>17 A. "The detainee was sat naked on his bed shivering and</p> <p>18 covered in his faeces."</p> <p>19 Roffey and Purnell found it funny. They started</p> <p>20 making snide comments.</p> <p>21 Q. Think of the comments.</p> <p>22 A. Purnell said to him in a sarcastic tone, "Do you want</p> <p>23 any toilet roll?" He said, "Do you need any toilet</p> <p>24 roll?", which he found hilarious and Roffey found</p> <p>25 hilarious. He was just treated like -- he stood there</p> <p style="text-align: center;">Page 53</p>	<p>1 Q. But you see what I mean? If they were doing it for</p> <p>2 a reason, to make the detained man's life even less</p> <p>3 comfortable, then it must have had some impact on him.</p> <p>4 A. Of course, sir.</p> <p>5 Q. What I'm asking is, what impact did it have --</p> <p>6 A. He wouldn't be able to --</p> <p>7 Q. -- turning the power off?</p> <p>8 A. Yes, of course, it was just -- it's inconvenient, more</p> <p>9 of an inconvenience for him. If he needed the</p> <p>10 electricity, it wasn't there for him to use it.</p> <p>11 Sometimes I think the power would be turned off if</p> <p>12 a restraint was going to happen in a cell and they</p> <p>13 didn't want the detainee having access to the kettle, or</p> <p>14 something like that, so I think that's why -- that's one</p> <p>15 of the reasons why it's possible to do that.</p> <p>16 They found it hilarious that the detainee had no</p> <p>17 electricity and had been left in such a state. He</p> <p>18 was -- the detainee, who was locked behind the door, he</p> <p>19 was suffering with mental health problems, quite</p> <p>20 clearly, covered in his own faeces, he was naked, he was</p> <p>21 cold, he was shivering, and it was just an act of -- it</p> <p>22 was just -- it was sickening, it still sickens me now,</p> <p>23 that the act of cruelty -- and I just can't -- I can't</p> <p>24 understand why -- why they did it. I just don't -- what</p> <p>25 they gained from it. I don't -- never been able to</p> <p style="text-align: center;">Page 55</p>
<p>1 and stared at this detainee as if it was kind of some</p> <p>2 form of entertainment, and then I think it was Roffey</p> <p>3 that slammed the door shut.</p> <p>4 We went into the wing office, which was only</p> <p>5 a couple of yards, a few yards, away from cell 2, and</p> <p>6 they continued laughing about the state of the detainee.</p> <p>7 Then, like, one of them, I can't remember which, turned</p> <p>8 off the power in the detainee's cell.</p> <p>9 Q. What time of day was this?</p> <p>10 A. This was in the evening, sir.</p> <p>11 Q. So in turning off the power, what did that mean for the</p> <p>12 detained man in his cell? Was there a light?</p> <p>13 A. Yes, there was a light, sir, yes.</p> <p>14 Q. But once you turn the electricity off, would he have</p> <p>15 light in his cell, in his room?</p> <p>16 A. I don't think so, sir. There was kind of -- you might</p> <p>17 have been able to turn on this kind of like -- there's</p> <p>18 a kind of built-in lamp into the wall. You maybe would</p> <p>19 have been able to turn off that. But he wouldn't have</p> <p>20 been able to use his kettle. I doubt he could have</p> <p>21 turned on any of his lights, to be honest.</p> <p>22 Q. There must have been a point, given the circumstances</p> <p>23 you're telling us about, to them turning the power off</p> <p>24 to his cell if it was to make a difference?</p> <p>25 A. There was no point.</p> <p style="text-align: center;">Page 54</p>	<p>1 understand what the point was in any of it. They'd</p> <p>2 responded to a fire alarm. There was no fire. Could</p> <p>3 they not have just left? I don't know.</p> <p>4 Q. Mr Tulley, the position that you told us about, and the</p> <p>5 way that you left it, is that this man is still naked,</p> <p>6 he is still covered in his faeces, the cell is covered</p> <p>7 in his faeces, the door is locked, the electricity is</p> <p>8 off and it is evening time. What became of him?</p> <p>9 I mean, is the cell left that way? Is he not taken to</p> <p>10 another cell so that somebody can go in and clean the</p> <p>11 cell? What happened?</p> <p>12 A. It should have been, sir. It should have been.</p> <p>13 Q. Who goes in and cleans the cell in that --</p> <p>14 A. They get these special people to come in in overalls and</p> <p>15 it's kind of, like, jet washed.</p> <p>16 Q. Did you check on that man later?</p> <p>17 A. I did check on him. I found him in the same state.</p> <p>18 I checked on him -- I recall checking on him that</p> <p>19 evening and finding him in the same state.</p> <p>20 Q. How long after, do you think?</p> <p>21 A. A couple of hours, sir, maybe. My understanding is an</p> <p>22 ACDT form was already open on the detainee, so I knew</p> <p>23 that he was at least being monitored by somebody, so</p> <p>24 that I knew that others would check on him. For reasons</p> <p>25 I've spoken about at length, I didn't feel I could raise</p> <p style="text-align: center;">Page 56</p>

<p>1 concerns. I certainly didn't feel like I could write in</p> <p>2 the ACDT form the extent to which he was abused.</p> <p>3 I mean, the ACDT form was for writing observations about</p> <p>4 the detainee's actions, not the actions of staff towards</p> <p>5 the detainee.</p> <p>6 Q. These two DCMs, Purnell and Roffey --</p> <p>7 A. Yes, sir.</p> <p>8 Q. -- I mean, you've made clear several times about why it</p> <p>9 was fruitless to report to a DCM the behaviour of a DCM?</p> <p>10 A. Yes, sir.</p> <p>11 Q. Were these men in particular popular, in any event?</p> <p>12 A. I mean, Graham Purnell was very close friends with</p> <p>13 Jules Williams, who was a member of the senior</p> <p>14 management team. Jules and Graham would often tell me</p> <p>15 about nights out they had been on together, so I knew</p> <p>16 that they both had good relationships with the senior</p> <p>17 management team and were well liked. So, you know, if</p> <p>18 I were to complain higher, I would never have been</p> <p>19 believed. As I say, there were no cameras in the cells,</p> <p>20 so how could my account have been corroborated?</p> <p>21 Q. That wasn't the only incident on 6 March. If you go</p> <p>22 back to your statement at paragraph 184 this time, here</p> <p>23 you weren't so much dealing with the treatment of</p> <p>24 vulnerable detained men, but, nonetheless, you were</p> <p>25 dealing with issues of conduct and attitude. Do you see</p> <p style="text-align: center;">Page 57</p>	<p>1 talking to you about what he did during, as you put it,</p> <p>2 a dirty protest, when the same day you actually</p> <p>3 witnessed that kind of situation yourself?</p> <p>4 A. Yes, sir. I didn't know if it was the same detainee</p> <p>5 that I'd witnessed being abused by the two managers, but</p> <p>6 the reason why I didn't really link them was because</p> <p>7 DCO Murphy refers to it as a dirty protest. I mean, it</p> <p>8 was clear from the -- to me, anyway, and of course I'm</p> <p>9 not an expert, but the detainee who I'd witnessed</p> <p>10 covering himself in his cell in his faeces, he wasn't</p> <p>11 making any demands, he wasn't -- he wasn't visibly</p> <p>12 protesting, he was just disturbed. He was just deeply</p> <p>13 disturbed. There was something seriously wrong with</p> <p>14 him. He couldn't communicate. I don't know if that was</p> <p>15 because he couldn't speak English or -- I don't know.</p> <p>16 But there were no demands being made by this detainee.</p> <p>17 It wasn't, in my eyes, a protest. There was something</p> <p>18 seriously wrong with him, and -- so I don't know if --</p> <p>19 I don't know if he was restrained that day by DCO Murphy</p> <p>20 and DCO Murphy considered it to be a dirty protest or if</p> <p>21 he was referring to another incident, sir.</p> <p>22 Q. Which came first: what you witnessed with the detained</p> <p>23 man in cell 2 that day or Jason Murphy telling you about</p> <p>24 what he had done in such a situation? Which came first:</p> <p>25 being told about it by Murphy and then seeing what</p> <p style="text-align: center;">Page 59</p>
<p>1 what you say there?</p> <p>2 A. Yes, sir.</p> <p>3 Q. Tell us about that incident, because you identify it as</p> <p>4 being on the very same day as the day you're now</p> <p>5 describing to us?</p> <p>6 A. Yes, sir.</p> <p>7 Q. Tell us about it?</p> <p>8 A. DCO former policeman called Murphy -- I can't remember</p> <p>9 his first name.</p> <p>10 Q. Jason?</p> <p>11 A. Jason Murphy, yes, described how, during a restraint, he</p> <p>12 was the shield officer, went in to restrain a detainee</p> <p>13 who had conducted a dirty protest of some sort, which</p> <p>14 is -- for those that don't know, that's covering</p> <p>15 yourself in your faeces -- and he used the shield to</p> <p>16 smash the detainee to the back of the cell before</p> <p>17 pushing his face and body into the detainee's faeces and</p> <p>18 urine.</p> <p>19 Q. That was something you also noted in the same book that</p> <p>20 you noted --</p> <p>21 A. Yes, sir.</p> <p>22 Q. -- the other account --</p> <p>23 A. Documented, yes, sir.</p> <p>24 Q. -- on 6 March. Which came first that day, because it</p> <p>25 feels rather ironic that you have got Jason Murphy</p> <p style="text-align: center;">Page 58</p>	<p>1 happened with Roffey and Purnell or the other way</p> <p>2 around?</p> <p>3 A. It was so long ago that I can't remember, sir, but my</p> <p>4 notes from the time might have times.</p> <p>5 Q. Okay. We can consider that, if necessary. It is not an</p> <p>6 important thing, but I just wanted to see if you had any</p> <p>7 recollection of it?</p> <p>8 A. Too long to remember the exact time, sir, I'm sorry.</p> <p>9 I think the thing that struck me about DCO Murphy was,</p> <p>10 he was quite new.</p> <p>11 Q. Yes.</p> <p>12 A. So -- I mean, I included this particular anecdote in my</p> <p>13 statement because it showed how a relatively new</p> <p>14 member of staff had the confidence to tell me that he</p> <p>15 had abused an inmate.</p> <p>16 Q. Tell me this, and it is a question that we have been</p> <p>17 asked to ask on behalf of G4S in relation to this</p> <p>18 particular incident, the Roffey/Purnell incident: why</p> <p>19 didn't you raise a complaint? I'm sure we know the</p> <p>20 answer, but I'm going to ask it anyway. Why didn't you</p> <p>21 raise a complaint or otherwise report it, for example,</p> <p>22 in an incident report?</p> <p>23 A. I think I've made it quite clear why I didn't feel</p> <p>24 I could raise concerns. These were two managers. We</p> <p>25 were told to raise concerns to managers in the first</p> <p style="text-align: center;">Page 60</p>

<p>1 instance. I didn't feel like I could go higher than</p> <p>2 them, because they had close relationships with the SMT,</p> <p>3 as I've said, and, like the rest of my colleagues at</p> <p>4 Brook House, I had absolutely no confidence in raising</p> <p>5 concerns internally at Brook House.</p> <p>6 So, I mean, what -- my question would be, what use</p> <p>7 would it have been to raise a complaint or a concern?</p> <p>8 How would I have ever corroborated -- you know,</p> <p>9 substantiated the complaint, given that there are no</p> <p>10 cameras inside the cells and given the hostility towards</p> <p>11 raising complaints, given that these were managers with</p> <p>12 close relationships to the SMT? I mean, it's quite a --</p> <p>13 it's -- yeah, it's just --</p> <p>14 Q. All right.</p> <p>15 A. It's completely -- it's ridiculous to actually -- when</p> <p>16 you factor everything in, to suggest that I was in</p> <p>17 a position to raise concerns and have them believed or</p> <p>18 listened to. It's just -- of course we know that now</p> <p>19 because of Nathan Ward's accounts of when he actually</p> <p>20 did raise concerns, and I've spoken about when another</p> <p>21 colleague raised concerns yesterday. So I won't just</p> <p>22 repeat things I've already said, but you couldn't raise</p> <p>23 concerns at Brook House about the treatment of</p> <p>24 detainees. It just wasn't -- or you couldn't do it</p> <p>25 effectively. It just wasn't possible. And I was not</p> <p style="text-align: center;">Page 61</p>	<p>1 section A of our file, chair, so for you it's A/4, so</p> <p>2 flag 4, behind section A.</p> <p>3 If we can put up on screen, please, <BBC000059>, to</p> <p>4 begin with at page 3. You can see here that towards the</p> <p>5 bottom of the page it says, "Reporting shift: 4 May".</p> <p>6 A. Yes, sir.</p> <p>7 Q. If we can go to the next page, and bearing in mind</p> <p>8 you're dealing with 4 May, and we will come back to</p> <p>9 this, but do you see where we have the first label for</p> <p>10 D1527?</p> <p>11 A. Yes, sir.</p> <p>12 Q. It reads:</p> <p>13 "In the afternoon, D1527 jumped on the D wing</p> <p>14 netting ..."</p> <p>15 A. Yes, sir.</p> <p>16 Q. We will come back to that incident a little later:</p> <p>17 "... jumped on the ... netting, said ..."</p> <p>18 Help us with it. It may be that zooming in, please,</p> <p>19 "said to [something]". Can you read that? Under the</p> <p>20 "D" of the first label?</p> <p>21 A. " ... jumped on the D wing netting, said to [have] been</p> <p>22 ..."</p> <p>23 Q. "... by one officer ..."?</p> <p>24 A. Yes:</p> <p>25 "... because he wasn't given a new plate and had to</p> <p style="text-align: center;">Page 63</p>
<p>1 willing to raise a concern only for it to be disbelieved</p> <p>2 or discredited. That would just make me more frustrated</p> <p>3 and angry.</p> <p>4 Q. Let's move on, then. Mr Tulley, what I'm going to try</p> <p>5 and do is take the incidents in chronological order.</p> <p>6 What I want to ask you now is about something entirely</p> <p>7 different. It relates to somebody called</p> <p>8 Calvin Sanders. What you deal with is certain things</p> <p>9 that he said to you on two occasions -- on 4 May and</p> <p>10 8 May 2017 -- but it appears in relation to something</p> <p>11 that may have taken place on 24 April?</p> <p>12 A. Yes, sir.</p> <p>13 Q. Let's remind ourselves. 24 April is the first day that</p> <p>14 you successfully filmed?</p> <p>15 A. I think so, sir, yes.</p> <p>16 Q. That's what you have told us. It is the day before the</p> <p>17 Paschali incident, of course, just fixing our gaze on</p> <p>18 where we are in the scheme of things.</p> <p>19 A. That's right.</p> <p>20 Q. The narrative that you give to this you'll find in your</p> <p>21 witness statement to the inquiry from paragraph 197 to</p> <p>22 paragraph 198. But you noted this up in one of your</p> <p>23 notebooks. Let's just have a look, because that would</p> <p>24 be probably the first place you will have noted it, even</p> <p>25 if you filmed it. Let's just have a look, please, at</p> <p style="text-align: center;">Page 62</p>	<p>1 use his own one."</p> <p>2 Q. "[He] was threatening to dive off the netting and down</p> <p>3 the stairs."</p> <p>4 Then you deal with Clayton Fraser -- is that</p> <p>5 right? --</p> <p>6 A. Yes, sir.</p> <p>7 Q. -- and what he said to you, and we will come back to</p> <p>8 that. So here is the context: you're dealing with the</p> <p>9 netting incident involving D1527 on 4 May, and then, at</p> <p>10 the bottom of the page:</p> <p>11 "While waiting for the escort ..."</p> <p>12 I think this is a different episode. You haven't</p> <p>13 put spaces between the various paragraphs, as you</p> <p>14 sometimes do, but here you say:</p> <p>15 "While waiting for the escort, I asked a DCO called</p> <p>16 Aaron."</p> <p>17 Is that right?</p> <p>18 A. Aaron.</p> <p>19 Q. That's Aaron Stokes?</p> <p>20 A. Yes, sir.</p> <p>21 Q. You put this in quote marks, I think, "What's the best</p> <p>22 way to deal with someone like D1527"?</p> <p>23 A. Yes.</p> <p>24 Q. And Aaron said, "Look away and hope he's swinging when</p> <p>25 you look back"?</p> <p style="text-align: center;">Page 64</p>

<p>1 A. Yes, sir.</p> <p>2 Q. Still putting this in context. "Another DCO", and this</p> <p>3 is where we come to putting the whole thing in context</p> <p>4 to Calvin Sanders, he said -- read that, please?</p> <p>5 A. "Another DCO Calvin Sanders then said how he bashed</p> <p>6 a detainee's head on a table."</p> <p>7 Q. The impression is you have the incident on the netting</p> <p>8 with 1527?</p> <p>9 A. Mmm-hmm.</p> <p>10 Q. If this is right, at some point later that same day, on</p> <p>11 4 May --</p> <p>12 A. Yes, sir.</p> <p>13 Q. -- you're involved in an escort with Stokes and Sanders?</p> <p>14 A. Yes, sir.</p> <p>15 Q. You say to Stokes, "What's the best way to deal with</p> <p>16 somebody like that?", by reference to 1527. Is that an</p> <p>17 example of one of your open questions?</p> <p>18 A. Yes, sir.</p> <p>19 Q. He gives the answer he gives, and Calvin Sanders, who is</p> <p>20 also involved in the same escort with the two of you</p> <p>21 later that day, says what he says about how he bashed</p> <p>22 a detainee's head on a table?</p> <p>23 A. Yes, sir.</p> <p>24 Q. Right so far?</p> <p>25 A. Correct.</p> <p style="text-align: center;">Page 65</p>	<p>1 something Calvin Sanders had told you. If we go back to</p> <p>2 something I introduced a little earlier, your</p> <p>3 Sussex Police witness statement, which is at flag 1 of</p> <p>4 tab A, <SXP000120>, can we put that up, please, at</p> <p>5 page 7. If we can zoom in on the second half of</p> <p>6 the page, beginning, "On Thursday, 4th May", because</p> <p>7 there you repeat, in effect, what we saw in the notebook</p> <p>8 about D1527 being on the netting, the conversation that</p> <p>9 you had with Clayton Fraser, to which we will return,</p> <p>10 and do you see the next paragraph:</p> <p>11 "Later the same day, I was on escort duty with DCO</p> <p>12 Aaron Stokes and DCO Calvin Sanders. Whilst we were all</p> <p>13 together, Calvin suggested that he slammed D1527's head</p> <p>14 on the desk and bent his fingers back."</p> <p>15 So that's 4 May?</p> <p>16 A. Yes, sir.</p> <p>17 Q. "During this conversation, I asked Aaron what was the</p> <p>18 best way to deal with someone like D1527. Aaron replied</p> <p>19 saying, 'Turn away and hopefully he's swinging'. I took</p> <p>20 this to mean he wished D1527 to hang himself."</p> <p>21 Let me ask you this, Mr Tulley: in your notebook</p> <p>22 regarding 4 May, did you see that there's a difference</p> <p>23 between what you said in your notes and what you say</p> <p>24 here in the Sussex Police statement which, let me remind</p> <p>25 you, is dated 23 November? In the note of 4 May, you</p> <p style="text-align: center;">Page 67</p>
<p>1 Q. In the same diary at page 8, we will see that it's the</p> <p>2 reporting shift of 8 May. At the foot of that page, if</p> <p>3 we can just zoom in on that, please:</p> <p>4 "In the afternoon in C wing office Calvin Sanders</p> <p>5 again told me how he smashed a detainee's head on</p> <p>6 a table."</p> <p>7 A. Yes, sir.</p> <p>8 Q. "He confirmed this was D1527."</p> <p>9 A. Yes, sir.</p> <p>10 Q. Is that right?</p> <p>11 A. That's correct, sir, yes.</p> <p>12 Q. If we just go on, because you continue writing:</p> <p>13 "A female member of staff ..."</p> <p>14 How does that read? I want to see if it's relevant</p> <p>15 to --</p> <p>16 A. "... then told me how short staffed the centre was while</p> <p>17 she was [working] on nights. She said she had been</p> <p>18 stuck on a constant supervision for 4 hours and that</p> <p>19 wings were left totally unattended."</p> <p>20 Q. Did that have anything to do with what Sanders had just</p> <p>21 told you?</p> <p>22 A. No, sir.</p> <p>23 Q. So it's a different conversation?</p> <p>24 A. Yes, sir.</p> <p>25 Q. So that's how you've noted, on two different occasions,</p> <p style="text-align: center;">Page 66</p>	<p>1 say Sanders then said how he bashed a detainee's head on</p> <p>2 a table and, unless I have missed it, I don't see</p> <p>3 anything in your note about bending fingers back, but</p> <p>4 you attribute to him, for 4 May, also telling you that</p> <p>5 he bent the detained man's fingers back, as well as</p> <p>6 bashing his head not on a table but you refer to a desk.</p> <p>7 Now, this is not me challenging you. I'm simply</p> <p>8 asking you how your note or your memory of what happened</p> <p>9 on what you were told on 4 May has changed between the</p> <p>10 note and your witness statement?</p> <p>11 A. It's a reflection of what I understood him to be talking</p> <p>12 about with reference to the same day, same incident.</p> <p>13 Q. Yes.</p> <p>14 A. It's possible that I got the two conversations confused</p> <p>15 and a bit mixed up, but, I mean, they were both recorded</p> <p>16 and on camera, so there's no doubt that they happened.</p> <p>17 I know you're not suggesting there is, but the point --</p> <p>18 the reason why that's somewhat irrelevant is because</p> <p>19 they're talking about the same incident, sir.</p> <p>20 Q. I know what you're saying. I'm just trying to</p> <p>21 understand why there was more detail in the witness</p> <p>22 statement. Had you looked at the footage before you</p> <p>23 made the witness statement?</p> <p>24 A. I'd watched the footage many times, sir, after filming</p> <p>25 it, but of course the contemporaneous notes were made</p> <p style="text-align: center;">Page 68</p>

<p>1 immediately after the shift, before I'd reviewed any 2 footage, which may explain why there is a slight 3 difference between them. 4 Q. Because, when we look at what you say here for 8 May, 5 there is also more detail than there was in your notes, 6 which merely said, or attributed to Calvin Sanders, that 7 he smashed a detainee's head on a table, confirming it 8 was D1527. Here, in your witness statement, made months 9 later, and presumably in between times you'd had plenty 10 of opportunity to see what he had said: 11 "On Monday, 8 May ... whilst on duty, I walked into 12 the office of C wing, where a female DCO whose name 13 I don't know and DCO Calvin Sanders were. I said, 14 'I was with your mate the other day', referring to 15 D1527." 16 When you say, "I was with your mate", was that 17 a reference to the 25 April incident, or something else? 18 A. I can't remember, sir. I think so. 19 Q. "... 'I was with your mate the other day', referring to 20 D1527. Calvin then said, 'I went out of the room to 21 make sure no-one was watching. When he was banging his 22 head on the table, on the bounce I went ...'." 23 You say: 24 "... he then demonstrated banging D1527's head on 25 the table with his hand."</p> <p style="text-align: center;">Page 69</p>	<p>1 something else that you have said, but I want to look at 2 a document, first of all. Chair, it should be in your 3 second volume at B/4. 4 THE CHAIR: Thank you. 5 MR ALTMAN: I'd like to put up, please, on screen 6 <CJS001085>. This is an ongoing record and I want to 7 ask you about it. We will look at some entries. Can we 8 just expand this at the top and we will go through 9 several entries, so we will have to do this repeatedly. 10 It calls itself an "Ongoing record". What would you 11 know this form as, this kind of form? 12 A. It looks like a constant supervision form, sir. 13 Q. Would this be part of an ACDT record? 14 A. Yes, sir. 15 Q. Would it typically be the sort of thing that would be 16 completed when a detained man was in the observation 17 cells in 7 or 8 of the Care and Separation Unit? 18 A. Yes, sir. 19 Q. We can see the date, it's 24 April. The first entry 20 made by a DCO at 5.00 in the morning is "Sleeping, 21 movement noted". So this will give us a sort of idea of 22 the kind of observations that were made? 23 A. Yes, sir. 24 Q. At 5.30, "Laying on his bed, appears asleep". At 25 6.00 o'clock, "Lying on his right side, duvet on the</p> <p style="text-align: center;">Page 71</p>
<p>1 A. Yes, sir. 2 Q. What I'd like you to do is demonstrate for us what he 3 showed you. So you, using your hand, show us what he 4 did with his? 5 A. (Indicating). 6 Q. Once or more than once? 7 A. Once, sir. 8 Q. You say: 9 "At this point he paused and his locked his hand or 10 arm to stop him from doing it." 11 Show us what that means? What does that mean?: 12 "At this point he paused and locked his hand or arm 13 to stop him from doing it." 14 What does that mean? 15 A. I guess he's suggesting he kind of took control of his 16 arm to stop him from self-harming. 17 Q. Right: 18 "He then demonstrated twisting D1527's fingers. 19 Calvin went on to say that 'If you're self-harming, 20 you're an attention-seeking little prick' or similar. 21 It was as though he was bragging about what he had done 22 to him." 23 What I would like, then, first to do, please, in 24 terms of documents, because we are not going to look at 25 footage, although we may look at a transcript of</p> <p style="text-align: center;">Page 70</p>	<p>1 floor". At 6.30, "Asleep, lying on his back". At 7.00, 2 "Asleep, moved onto his right side". At 7.29, "Asleep 3 on his left side. Duvet now [on] him." 4 Is that the kind of minutiae and granular detail 5 which was expected if somebody was on constant 6 supervision? So every movement? 7 A. Yes, sir. I mean, whoever is making these 8 observations -- DCO Shad -- is not making many, but I 9 think that's just because he's -- the detainee is 10 asleep, so there's not as many movements during the 11 hours of the day when the detainee is awake and moving 12 about. He'd probably be making them more frequently, 13 sir. 14 Q. Then we have a handover. Can we just expand that typed 15 entry, please. It looks like a stamped entry: 16 "Handover. 17 "Oncoming staff have been shown to the whereabouts 18 of the detainee at risk, satisfied themselves that they 19 are breathing and that they are the correct detainee as 20 per the ACDT document." 21 What's the ACDT document? What does that mean? 22 A. That's the form I was referring to earlier. 23 Q. The form you were referring to: 24 "Oncoming staff have been briefed on the frequency 25 of conversations and observations required for this</p> <p style="text-align: center;">Page 72</p>

<p>1 detainee, how the detainee is coping, care map and</p> <p>2 triggers have been explained and the ACDT plan handed</p> <p>3 over."</p> <p>4 So this seems to be a formal, rather formulaic</p> <p>5 handover which -- am I right in thinking this is just</p> <p>6 a rubber stamping literally on this document at that</p> <p>7 point in time?</p> <p>8 A. Yes, sir.</p> <p>9 Q. It's dated, we can see, that same date, 24 April. It is</p> <p>10 timed at five to eight that morning and you have the</p> <p>11 signature, although we don't see who it is, of</p> <p>12 the briefing staff member and the signature of</p> <p>13 the oncoming staff member. So if this system of</p> <p>14 handover was working as it should, the briefing staff</p> <p>15 member would be the one who'd just been on observations</p> <p>16 and was coming off and was literally handing over the</p> <p>17 observations of that detained man to the oncoming staff</p> <p>18 member?</p> <p>19 A. Yes, sir.</p> <p>20 Q. Both of whom sign that the handover has been properly</p> <p>21 conducted?</p> <p>22 A. Yes, sir.</p> <p>23 Q. Were you, yourself, ever engaged in handovers like this?</p> <p>24 A. These handovers often occurred sort of at the end of</p> <p>25 a night shift, when new staff come on to a morning</p> <p style="text-align: center;">Page 73</p>	<p>1 Can we go to the next page, please. If we look at the</p> <p>2 fifth entry down, the one at 12.40, at the top, I'm just</p> <p>3 taking us through because it's the first time we have</p> <p>4 seen a form like this, and so it's a good example of</p> <p>5 this kind of constant supervision and the entries made.</p> <p>6 That's at 12.40:</p> <p>7 "Still Laying in the bed. Refused lunch."</p> <p>8 So there's a lunch refusal and it is noted in this</p> <p>9 document. Would it also have been noted in the usual</p> <p>10 monitoring form for food refusals, or was that</p> <p>11 unnecessary in this kind of instance?</p> <p>12 A. It should have been, sir.</p> <p>13 Q. Then, at the foot of that page, we are in the early</p> <p>14 afternoon -- the bottom half, 15:15 and onwards. This</p> <p>15 tells us that this was the monitoring of D1527, because</p> <p>16 we can see his cipher appear at 15:04. He is now up and</p> <p>17 playing on the pool table with other detainees. So he</p> <p>18 is out of his cell and he is playing pool. Now, let's</p> <p>19 just understand this. He was on constant supervision?</p> <p>20 A. Yes, sir.</p> <p>21 Q. Was he, therefore, from your -- looking at this form,</p> <p>22 and so that I haven't got it wrong, would he have been</p> <p>23 on constant supervision in the Care and Separation Unit</p> <p>24 or the main part of E wing?</p> <p>25 A. The main part of E wing, sir.</p> <p style="text-align: center;">Page 75</p>
<p>1 shift. So very rarely, sir. Occasionally. But usually</p> <p>2 the handovers were -- not usually, but often, the</p> <p>3 handovers were less formal.</p> <p>4 Q. That was my next question. I mean, this looks like</p> <p>5 a lot of information has been imparted, as it should be,</p> <p>6 and has been received and understood by the person who</p> <p>7 is coming on duty.</p> <p>8 A. Mmm-hmm.</p> <p>9 Q. In your experience, or even in your limited experience,</p> <p>10 of a handover of this nature, was it carried out as this</p> <p>11 stamp suggests it ought to have been?</p> <p>12 A. Sometimes. But in my limited experience, it often</p> <p>13 wasn't the case.</p> <p>14 Q. So we can see -- thank you, you can take that off. Then</p> <p>15 we look at the next entry, at the bottom half of this</p> <p>16 particular page. We can see the handwriting changes.</p> <p>17 It's at 8.15:</p> <p>18 "Seen [something] complete physical health. Checks</p> <p>19 which he declined."</p> <p>20 It seems to read. Then, again, we have another</p> <p>21 series of entries:</p> <p>22 "Lying in bed on right side. Movement ..." and so</p> <p>23 on.</p> <p>24 A. Yes, sir.</p> <p>25 Q. So that's the early hours into the morning of 24 April.</p> <p style="text-align: center;">Page 74</p>	<p>1 Q. So he wouldn't be in one of those observation cells with</p> <p>2 the big viewing panel, or would he be?</p> <p>3 A. He could have been. I don't think he was on this day.</p> <p>4 But if he were in one of those cells -- regardless of</p> <p>5 what cell you're on on E wing, you didn't have to stay</p> <p>6 in your cell. So during association times, even if you</p> <p>7 were in one of the cells with the big windows on, you</p> <p>8 could still leave your cell.</p> <p>9 Q. Let me just understand this, because it's easy for us to</p> <p>10 be confused and it's even simpler for me to confuse</p> <p>11 everybody else. Cells 7 and 8.</p> <p>12 A. Yes, sir.</p> <p>13 Q. Were they in the main part of E wing or the Care and</p> <p>14 Separation Unit?</p> <p>15 A. The main part of E wing.</p> <p>16 Q. They were the ones with the big viewing panels?</p> <p>17 A. Yes, sir. At either end of the wing.</p> <p>18 Q. Then we have at 15:15:</p> <p>19 "After completing D1527's review and informing him</p> <p>20 that he won't be returning to his old room due to his</p> <p>21 low mood and demeanour, D1527 began to throw his chair</p> <p>22 around his room in anger. D1527's chair has now been</p> <p>23 removed from his room and he will remain in Eden wing</p> <p>24 until he is reviewed again tomorrow."</p> <p>25 We can see who signed that one off. That's</p> <p style="text-align: center;">Page 76</p>

<p>1 Nathan Ring; yes? Can you see "DM N Ring" at the end of</p> <p>2 that?</p> <p>3 A. Just about, sir, yes.</p> <p>4 Q. Not his signature, but you can see "DM" or "DCM N Ring"?</p> <p>5 A. I think so, sir.</p> <p>6 Q. Then at 15:20:</p> <p>7 "D1527 was under his cover attempting to ..."</p> <p>8 Well, it reads, it looks like, "attempting to</p> <p>9 ligature around his neck."</p> <p>10 A. It looks like that, sir.</p> <p>11 Q. "Myself and DCM Michelle Brown with the help of Oscar 1</p> <p>12 Nathan Ring, we removed the ligature."</p> <p>13 So that's at 15:20 on 4 April. Then to the next</p> <p>14 page, at the top of the page, I think it is 15:32, it</p> <p>15 could be 37:</p> <p>16 "Refused to engage with healthcare. Verbalised that</p> <p>17 he did not want physical observations to be undertaken."</p> <p>18 We can see that's HCA. Is that a healthcare</p> <p>19 assistant? What does that refer to?</p> <p>20 A. I'm not sure, sir, I'm sorry. Probably that.</p> <p>21 Q. 15:40:</p> <p>22 "Officer trying to talk to D1527 about how he is</p> <p>23 feeling and trying to get him to change rooms."</p> <p>24 Then this, same day, at 15:40, and this is why I've</p> <p>25 gone through it a bit. We see DCO Kalvin Sanders has</p> <p style="text-align: center;">Page 77</p>	<p>1 16:35:</p> <p>2 "Continues to cry with his head on the base of</p> <p>3 the bed."</p> <p>4 16:47:</p> <p>5 "... has engaged in conversation and is now talking</p> <p>6 to me -- wishes to go to the mosque."</p> <p>7 17:05:</p> <p>8 "Operations manager Caz Dance-Jones has come into</p> <p>9 [his] room to see what's wrong."</p> <p>10 Pausing there, what level within the G4S structure</p> <p>11 was Caz Dance-Jones?</p> <p>12 A. I think she was a member of the SMT, sir.</p> <p>13 Q. Then top of next page, please, 17:15:</p> <p>14 "DCM Stewart Povey ..."</p> <p>15 He's the chap you spoke about yesterday whom you</p> <p>16 respected?</p> <p>17 A. Yes, sir.</p> <p>18 Q. "DCM Stewart Povey came to speak to D1527 as he wishes</p> <p>19 to move back to C wing."</p> <p>20 Then 17:34:</p> <p>21 "Appears to be calm now and is engaging in more</p> <p>22 depth conversation."</p> <p>23 And finally, I think, as far as Sanders is</p> <p>24 concerned, 17:42:</p> <p>25 "Have tried persuading D1527 to eat but says he</p> <p style="text-align: center;">Page 79</p>
<p>1 now come on duty and now he's going to do the constant</p> <p>2 supervision. Let's just look at his observations</p> <p>3 because we will find that he was engaged in supervising</p> <p>4 D1527 on E wing for two hours. At 15:40:</p> <p>5 "DCO Kalvin Sanders doing constant ob [observations]</p> <p>6 on D1527. Appears to be lying on his front with his</p> <p>7 head buried in his arms."</p> <p>8 Ten minutes later, 15:50:</p> <p>9 "... still laying on his front. Appears to be</p> <p>10 crying -- ask him what was wrong -- no response."</p> <p>11 At 15:52:</p> <p>12 "D1527 was banging his head on the base of his bed</p> <p>13 repeatedly. I went in to prevent him doing any further</p> <p>14 damage."</p> <p>15 All right?</p> <p>16 A. Yes, sir.</p> <p>17 Q. At 16:03:</p> <p>18 "Is trying to drive his index either side of his</p> <p>19 neck with extreme pressure -- I have asked him to stop</p> <p>20 or I will place my hands on his hands to pull them away</p> <p>21 to prevent him injuring himself."</p> <p>22 At 16:16:</p> <p>23 "Keeps banging his head on the base of his bed.</p> <p>24 I am trying to talk him out of it and to sit up and talk</p> <p>25 to me. So I can try and help."</p> <p style="text-align: center;">Page 78</p>	<p>1 won't eat unless he goes back to C wing. Then he will</p> <p>2 eat."</p> <p>3 Just because we have it open now, can we go to</p> <p>4 page 7 because these observations continue, and, right</p> <p>5 at the bottom, they go from just before midnight on</p> <p>6 24 April into the early hours of the 25th. The second</p> <p>7 entry up from the bottom we can see 3 minutes past</p> <p>8 midnight. This goes on for several pages. I'm just</p> <p>9 going to show this now. Obviously we will come back to</p> <p>10 it. Can we go to page 17, please. Right at the top, if</p> <p>11 we can expand the top half, please, we will see the</p> <p>12 entry on 25 April at 19:01:</p> <p>13 "D1527 kicking and banging door."</p> <p>14 And it is signed off by Fraser. Then at 19:40, so</p> <p>15 39 minutes later:</p> <p>16 "Seen in room 7 constant watch."</p> <p>17 Now, room 7, is that the observation cell number 7</p> <p>18 with the big viewing panel, not in Care and Separation</p> <p>19 but in the main part of E wing?</p> <p>20 A. Yes, sir.</p> <p>21 Q. "... constant watch. D1527 had tied a T-shirt around</p> <p>22 his neck, angry - upset, had mobile phone battery in his</p> <p>23 mouth. Attempted to self-strangulate ..."</p> <p>24 Could be "in bed". Not sure:</p> <p>25 "[Usual] observations only due to demeanour."</p> <p style="text-align: center;">Page 80</p>

<p>1 It's signed off -- hard to tell what that means.</p> <p>2 Have you got any idea? Looks like "Resp 16". Does that</p> <p>3 mean anything to you?</p> <p>4 A. It doesn't, sir.</p> <p>5 Q. No, "Self-strangled in toilet". I can read it better</p> <p>6 on the screen than I can on paper:</p> <p>7 "Self-strangled in toilet. [Usual] observations,</p> <p>8 only due to demeanour. Resp 16."</p> <p>9 A. I can't be certain who wrote that and we will see later</p> <p>10 on in the undercover footage that this sounds like what</p> <p>11 the nurse reads out to me, something similar to what the</p> <p>12 nurse reads out to me after the choke. I don't know if</p> <p>13 this is what she's reading, but it's something similar.</p> <p>14 THE CHAIR: Mr Altman, I believe it says "Visual</p> <p>15 observations only" rather than "usual".</p> <p>16 MR ALTMAN: I believe you're right.</p> <p>17 A. Please could I quickly go to the toilet? I might be</p> <p>18 a second, I'm sorry.</p> <p>19 MR ALTMAN: Don't apologise. You can go.</p> <p>20 A. I'm not desperate.</p> <p>21 (12.34 pm)</p> <p>22 (A short break)</p> <p>23 (12.37 pm)</p> <p>24 MR ALTMAN: Can we put up on screen Mr Tulley's police</p> <p>25 statement, <SXP000120> at page 7. If we can just expand</p> <p style="text-align: center;">Page 81</p>	<p>1 A. Yes, sir.</p> <p>2 Q. When did you put two and two together, do you think,</p> <p>3 that he must have been talking about this particular</p> <p>4 occasion, 24 April, when he was with 1527 on constant</p> <p>5 supervision on E wing?</p> <p>6 A. I don't know the exact time. Sometime after the</p> <p>7 conversation in early May.</p> <p>8 Q. Let's have a look, as I said I might, let's go to</p> <p>9 a transcript of a video diary you made on 13 May. If we</p> <p>10 get our bearings, it's within a week after the second of</p> <p>11 the conversations you had with Calvin Sanders. It's B/2</p> <p>12 for you, chair, and it is <TRN0000047> at page 31. Can</p> <p>13 you see there, this is 13 May, although the date doesn't</p> <p>14 show on these video diaries, but it's 13 May. It's the</p> <p>15 same day as an incident we will come to, the attempted</p> <p>16 suicide by D628. As I say, it's within a week of</p> <p>17 the second of the two conversations you had with</p> <p>18 Sanders. You say at the top:</p> <p>19 "So, on two occasions now, I've filmed -- sorry.</p> <p>20 What the fuck is his name?"</p> <p>21 Says the producer or whoever is speaking to you,</p> <p>22 "Calvin". You say:</p> <p>23 "On two occasions now, I've filmed Calvin talking</p> <p>24 about assaulting this Egyptian detainee. It's just</p> <p>25 occurred to me that I was there on that day, filming</p> <p style="text-align: center;">Page 83</p>
<p>1 the top half, please, do you see you say:</p> <p>2 "On Monday, 24th April 2017, I was working my normal</p> <p>3 13-hour shift as sports officer which gave me free range</p> <p>4 of all the wings within Brook House. At some point</p> <p>5 during this shift I walked into E wing and went to</p> <p>6 room 1 where I saw D1527 lying face down on his bed,</p> <p>7 motionless. In the room with him was DCO Calvin</p> <p>8 sanders, who was sat on the desk between the 2 beds.</p> <p>9 I said to Calvin, 'What's wrong with him, what's he</p> <p>10 doing?', Calvin said, 'Keeps digging his fingers into</p> <p>11 his neck'. I can't remember what else was said apart</p> <p>12 from Calvin saying he would 'get through to him</p> <p>13 eventually'. I did not really take any notice of this</p> <p>14 remark and left the room. I cannot recall if I actually</p> <p>15 spoke to D1527 but I know he was lying face down on his</p> <p>16 bed motionless."</p> <p>17 Did there come a point in time where you put two and</p> <p>18 two together, because, of course, the one thing you</p> <p>19 wouldn't have had access to, I assume, is the ongoing</p> <p>20 record of observations that we have gone through</p> <p>21 together. But what you did have were two conversations</p> <p>22 with Calvin Sanders in particular, on 4 and 8 May, noted</p> <p>23 originally that he had banged the detainee's head, added</p> <p>24 to in your police statement that he'd also bent his</p> <p>25 fingers back?</p> <p style="text-align: center;">Page 82</p>	<p>1 him, when he says he was in the room sat on the desk</p> <p>2 with this detainee. It was at that time, it was on that</p> <p>3 day, that he smashed his head against the table. I had</p> <p>4 no idea what was going on in that room. To me it was</p> <p>5 just an officer inside the room with someone who was on</p> <p>6 constant supervision, perhaps offering some advice or</p> <p>7 support. But, as we've heard, Calvin was smashing his</p> <p>8 head on a table."</p> <p>9 And you're reminded "While twisting his hand". You</p> <p>10 say, "Yeah". So that's 13 May and how, as it were, you</p> <p>11 put two and two together. So that we are clear, the</p> <p>12 chronology is, you actually see Calvin Sanders on</p> <p>13 constant supervision on E wing on 24 April?</p> <p>14 A. Yes.</p> <p>15 Q. Which happens also to be the first day of successful</p> <p>16 filming?</p> <p>17 A. Yes, sir.</p> <p>18 Q. Just so there is no confusion, was he sitting outside</p> <p>19 the cell or was he inside with him? What would be the</p> <p>20 norm?</p> <p>21 A. He was inside the cell with him, but that --</p> <p>22 Q. Would that be normal?</p> <p>23 A. Normally, you would sit outside the cell door, so you</p> <p>24 were visible.</p> <p>25 Q. Visible to ...?</p> <p style="text-align: center;">Page 84</p>

<p>1 A. The security cameras and other people on the wing.</p> <p>2 Q. What reason could there be for him going inside the cell</p> <p>3 to conduct constant supervision?</p> <p>4 A. To prevent him from self-harming, sir, or something more</p> <p>5 sinister.</p> <p>6 Q. On the day that you actually, therefore, see him, was</p> <p>7 there anything that said to you, "Something's been going</p> <p>8 on here"? Because the impression that you give in your</p> <p>9 witness statement to the police, the one that I have</p> <p>10 just read out to you, is that he was being helpful and</p> <p>11 offering advice and support to 1527 while he was</p> <p>12 observing him?</p> <p>13 A. Well, at the time, I had no reason to believe that that</p> <p>14 wasn't the case, but, on reflection, given what Saunders</p> <p>15 [sic] later told me, and given the fact he was sitting</p> <p>16 inside the cell and yet the detainee was lying</p> <p>17 motionless on the bed and was clearly not trying to</p> <p>18 self-harm, it almost seems obvious that something</p> <p>19 untoward was going on. I mean, it clearly was, given</p> <p>20 the admission that Saunders [sic] later made.</p> <p>21 Q. Let's think about this. I just want to test this, just</p> <p>22 a bit?</p> <p>23 A. Sure.</p> <p>24 Q. When you saw Calvin Sanders on constant supervision, how</p> <p>25 long were you with him? We know from the observation</p> <p style="text-align: center;">Page 85</p>	<p>1 about is, in fact, D1527?</p> <p>2 A. Yes, sir.</p> <p>3 Q. But you say, in actual fact, it goes far further,</p> <p>4 because it wasn't just a question of repeatedly banging</p> <p>5 his head on a table, it was also bending his fingers</p> <p>6 back?</p> <p>7 A. Yes, sir.</p> <p>8 Q. I have to ask you this, and I probably will ask you this</p> <p>9 kind of question more than once in relation to certain</p> <p>10 types of things that you have been told, but on</p> <p>11 4 and 8 May, when he told you what he did about what he</p> <p>12 was saying he had done, as it turns out, to 1527 some</p> <p>13 days before on 24 April, did you believe him?</p> <p>14 A. It's hard to remember at the time if I believed him or</p> <p>15 not.</p> <p>16 Q. You probably knew the man. You knew Calvin Sanders.</p> <p>17 You worked with him?</p> <p>18 A. He was a very new officer, sir.</p> <p>19 Q. He was ...?</p> <p>20 A. He was a very new officer.</p> <p>21 Q. At this time?</p> <p>22 A. Yes.</p> <p>23 Q. So bearing all of that in mind, bearing in mind you had</p> <p>24 seen him, albeit for a couple of minutes at best, on</p> <p>25 24 April, bearing in mind that what he told you on 4 May</p> <p style="text-align: center;">Page 87</p>
<p>1 log that he was with him for two hours. Presumably, you</p> <p>2 weren't --</p> <p>3 A. No, sir.</p> <p>4 Q. -- watching him for two hours. More likely two minutes,</p> <p>5 I would have thought.</p> <p>6 A. Yes, sir.</p> <p>7 Q. To be fair, you were there for a microcosm of the time</p> <p>8 in relation to the two hours that he was on constant</p> <p>9 supervision of him?</p> <p>10 A. Yes, sir.</p> <p>11 Q. But during the occasion where you came across him on</p> <p>12 constant supervision of 1527 on 24 April, nothing</p> <p>13 untoward was going on?</p> <p>14 A. No, sir.</p> <p>15 Q. Nor was he bragging that anything untoward had happened?</p> <p>16 A. No, sir.</p> <p>17 Q. The first time he mentions doing anything untoward to</p> <p>18 a particular detainee, without saying who it was or when</p> <p>19 it was, was on 4 May?</p> <p>20 A. Yes, sir.</p> <p>21 Q. When all he said to you -- it is not quite right; when</p> <p>22 all you noted about it at the time was that he had</p> <p>23 banged his head on a table; right? Four days later, on</p> <p>24 8 May, you get a little more information, at least as</p> <p>25 far as you have noted it down, that the man he's talking</p> <p style="text-align: center;">Page 86</p>	<p>1 was in the company of Aaron Stokes, bearing in mind what</p> <p>2 he told you on 8 May, a few days later, confirming it</p> <p>3 was 1527, I think when you were in the company of</p> <p>4 a female officer on that occasion --</p> <p>5 A. Yes, sir.</p> <p>6 Q. -- did you think, "This is a newbie who is just bragging</p> <p>7 and it's bravado", or did you think at that time that,</p> <p>8 actually, this really must have happened? Let me throw</p> <p>9 one other thing in the pot for you to think about now,</p> <p>10 and it may be nitpicking or splitting hairs, but the</p> <p>11 observations, if that's all we had, everything looks</p> <p>12 perfectly fine, that he was a caring officer, there to</p> <p>13 help D1527. If that's all you had, then looking at it,</p> <p>14 it all looks fine and dandy and that everything he had</p> <p>15 done was perfectly good. Do you agree with that?</p> <p>16 A. Sir, it wasn't all I had, because he had told me --</p> <p>17 Q. No, but my question is based on, if that's all you had,</p> <p>18 on the face of it, superficially, the observations say</p> <p>19 that everything is fine?</p> <p>20 A. Well, sir, an officer would never write in the constant</p> <p>21 obs that he had abused a detainee.</p> <p>22 Q. No, no, I understand. But there is another feature</p> <p>23 I want to ask you about and that's why I'm talking about</p> <p>24 splitting hairs. What he says is that D1527 was</p> <p>25 repeatedly banging his head on the base of a bed. The</p> <p style="text-align: center;">Page 88</p>

<p>1 information he gave you was that he was banging his head 2 on a table, "he" being Sanders. Now, some may say, 3 well, what's the difference? Well, if one were 4 examining these facts, there's a huge difference. There 5 is a huge difference between the base of a bed and 6 a table. My first question is, was there a table in 7 that room for him to bang his head on?</p> <p>8 A. Yes.</p> <p>9 Q. Or a desk?</p> <p>10 A. Yes, sir.</p> <p>11 Q. There was. Did you query any of that with him? Did you 12 question him or challenge him about what he was telling 13 you?</p> <p>14 A. I was secretly filming at the time, so I was asking him 15 about it, trying to get as much information as I could 16 about the incident.</p> <p>17 Q. But bearing everything in mind, and bearing particularly 18 in mind that this was, as you tell us, a new officer, 19 and looking back, do you think it happened, it might 20 have happened or it could just have been bravado?</p> <p>21 A. Looking back, I think it did happen. At the time, did 22 I believe him? It's hard to remember exactly how I felt 23 at the time. I mean, yeah, you're not -- you've got -- 24 you're thinking about so many things while you're 25 secretly filming, you know, the main one being not being</p> <p style="text-align: center;">Page 89</p>	<p>1 might have happened in that situation?</p> <p>2 A. I assume Sanders would have said, as I've said -- I've 3 written in the constant supervision logs, that he was 4 banging his bed on the base of the bed, or whatever it 5 was, that this is where he got -- sustained his 6 injuries.</p> <p>7 Q. So we could look at it this way, that if what Sanders 8 told you on 4 and 8 May about the head banging was 9 accurate, then there is a possibility that what he had 10 written up in the ongoing record about the detained man 11 himself banging his head on the base of a bed was false?</p> <p>12 A. Of course, sir.</p> <p>13 MR ALTMAN: That's all I'm going to ask you about that.</p> <p>14 Chair, I'm now coming to 25 April, and I would 15 likely start by asking Mr Tulley for a narrative, just 16 to set up the playing of the video. I can start that 17 now or start afresh at 2.00 pm. I'm entirely in your 18 hands. Or we could break now and come back a little 19 earlier?</p> <p>20 THE CHAIR: Why don't we break now and come back at 1.50 pm.</p> <p>21 MR ALTMAN: Is that all right?</p> <p>22 A. Yes, sir.</p> <p>23 THE CHAIR: Thank you.</p> <p>24 (12.52 pm)</p> <p>25 (The short adjournment)</p> <p style="text-align: center;">Page 91</p>
<p>1 caught and asking the right questions and conducting 2 yourself in the right way. You know, you're not kind of 3 thinking in the moment how credible someone's claims 4 are. So it's possible it was bravado, but -- the reason 5 I think I -- the reason I think it happened and the 6 reason I probably believed him at the time was because 7 of the demonstration that he showed me.</p> <p>8 Q. Did he demonstrate the finger bending as well as the 9 head banging?</p> <p>10 A. Yes, sir, and this is --</p> <p>11 Q. What did he show you?</p> <p>12 A. -- it's on the secret recording. Just that he bent his 13 fingers back (indicating). So he kind of demonstrated 14 to me and it seemed credible. He said it twice, sir. 15 He told me the same story twice and they didn't 16 contradict one another.</p> <p>17 Q. If he had done it -- I don't know, it depends on how 18 hard he'd done it -- there was a risk there'd be 19 injuries on 1527's head?</p> <p>20 A. Yes, sir.</p> <p>21 Q. Which somebody else could have noted and reported?</p> <p>22 A. Yes, sir.</p> <p>23 Q. What might have happened in that situation? If somebody 24 had said, you know, "There are unaccounted for injuries 25 which the observation logs don't account for"? What</p> <p style="text-align: center;">Page 90</p>	<p>1 (1.59 pm)</p> <p>2 MR ALTMAN: Mr Tulley, let's come on to the incident on 3 25 April 2017, which we referred to as the choke-hold 4 incident.</p> <p>5 You have given two narrative accounts of 6 the incident -- one to the police in your Sussex Police 7 statement of 23 November; and another version, albeit 8 you anonymised the people involved, in your statement to 9 the NMC, the Nursing & Midwifery Council. If I ask you 10 to give a narrative now, would you prefer to have one of 11 those documents in front of you to refresh your memory, 12 or does your memory need any refreshing, and can you 13 give us an account of what happened before we play the 14 footage of what the circumstances were. What do you 15 feel more comfortable with?</p> <p>16 A. I'm happy to just go ahead.</p> <p>17 Q. Let's begin, then. It's 25 April. You will remember 18 a little earlier we looked at that ongoing record of 19 constant observations on D1527 on 25 April, and the 20 entry began at 1 minute past 7.00, but the actual 21 substantive entry which I read out -- do you remember? 22 We can look at it again if you want -- was at 19:40, 23 20 minutes to eight. Is that the time, more or less -- 24 I don't expect a precise time, but is that, as you 25 remember it now, the sort of time, evening time, when</p> <p style="text-align: center;">Page 92</p>

<p>1 the incident, which was effectively in three parts, took</p> <p>2 place?</p> <p>3 A. Yes, sir, it was around that time.</p> <p>4 Q. As for you, what duty were you on that evening, before</p> <p>5 these incidents began?</p> <p>6 A. I think that day I was assigned to be an activities</p> <p>7 officer, but because of short staffing, I was, in the</p> <p>8 evening, assigned to work on Eden wing, E wing.</p> <p>9 Q. Yes.</p> <p>10 A. My responsibility on Eden wing at the -- for the first</p> <p>11 sort of hour was to observe a detainee under constant</p> <p>12 supervision in cell 8.</p> <p>13 Q. Was, on the wing at the time, there another officer by</p> <p>14 the name of Neeha?</p> <p>15 A. Yes, sir.</p> <p>16 Q. Which you spell in your statement N-E-E-H-A?</p> <p>17 A. Yes, sir.</p> <p>18 Q. I have seen different spellings, but perhaps that's how</p> <p>19 you would spell it. What was she doing?</p> <p>20 A. She was working on the wing as well, covering short</p> <p>21 staffing, but she was not a busy officer. She was sort</p> <p>22 of just keeping an eye on the wing.</p> <p>23 Q. Was there another officer by the name of Clayton Fraser</p> <p>24 present?</p> <p>25 A. Yes, sir.</p> <p style="text-align: center;">Page 93</p>	<p>1 cell 8 are at the end of E wing. So at the end of</p> <p>2 E wing is a large wall, and then a gate and a locked</p> <p>3 door which leads to the control and separation unit. So</p> <p>4 there is the wall and then there's the cell doors, like</p> <p>5 so (indicating), so I was sat with my back to the wall,</p> <p>6 which led to the Care and Separation Unit. To my left</p> <p>7 was cell 8. To my right was cell 7. So I was facing</p> <p>8 down the wing. I was observing the detainee in cell 8,</p> <p>9 but I heard banging coming from cell 7.</p> <p>10 Q. Forgive me. If we understand the way you positioned</p> <p>11 yourself, you're making observations on the cell to your</p> <p>12 left?</p> <p>13 A. Yes, sir.</p> <p>14 Q. And the banging is coming from your right?</p> <p>15 A. Yes, sir. So I remained in contact with the detainee in</p> <p>16 cell 7 -- cell 8, sorry, since he was -- I was</p> <p>17 responsible for observing him, and this was, you know,</p> <p>18 of paramount importance because such was his risk of</p> <p>19 self-harm and suicide. But I also was able to position</p> <p>20 myself momentarily at times to kind of try and get</p> <p>21 a glimpse of what was happening in cell 7, but it wasn't</p> <p>22 really possible to see what was happening because I had</p> <p>23 to remain close to cell 8 so I could continue observing</p> <p>24 the suicidal detainee in that cell.</p> <p>25 Q. So --</p> <p style="text-align: center;">Page 95</p>
<p>1 Q. What was he doing at the time?</p> <p>2 A. He was on the constant supervision in cell 7, which was</p> <p>3 the cell in which D1527 was being observed.</p> <p>4 Q. So we have you, you're making observations on cell --</p> <p>5 did you say cell 8?</p> <p>6 A. Yes, sir, which is directly opposite cell 7.</p> <p>7 Q. Clayton Fraser on room 7, cell 7, where 1527 is?</p> <p>8 A. Yes, sir.</p> <p>9 Q. And Neeha was on the wing?</p> <p>10 A. At the bottom of the wing, yes, sir.</p> <p>11 Q. The other two are both DCOs?</p> <p>12 A. Yes, sir.</p> <p>13 Q. What was the first that made you aware that something</p> <p>14 was going on in 1527's cell?</p> <p>15 A. I could hear banging.</p> <p>16 Q. Right.</p> <p>17 A. Either on the cell door or perhaps it was on the wall,</p> <p>18 sir.</p> <p>19 Q. So if it was the cell door, it suggests his cell door</p> <p>20 was closed?</p> <p>21 A. Yes, sir.</p> <p>22 Q. As a result that banging, what did you do?</p> <p>23 A. Well, I had my back to the wall, so -- the two cells are</p> <p>24 at the end of the wing, so the very last two -- the</p> <p>25 constant supervision cell 7 and constant supervision</p> <p style="text-align: center;">Page 94</p>	<p>1 A. So I hear banging, but I'm not exactly sure what's going</p> <p>2 on or why. Shortly afterwards, the detainee I'm</p> <p>3 observing is not behind a locked door, so he's free to</p> <p>4 leave his cell. He was eating in cell 8. So he leaves</p> <p>5 the wing and goes down to the bottom of the wing near to</p> <p>6 where Neeha is working. I follow him because I need to</p> <p>7 observe him. I hear more banging and commotion coming</p> <p>8 from cell 7, and I'm interested and I want to know</p> <p>9 what's happening there.</p> <p>10 So I asked Neeha if she would mind taking over</p> <p>11 responsibility of observing the detainee that had come</p> <p>12 from cell 8 with me and she agreed. She took over</p> <p>13 constant supervision of the detainee from cell 8.</p> <p>14 I was then free to go up to cell 7 to see what was</p> <p>15 going on. When I entered the cell --</p> <p>16 Q. So the door is open now?</p> <p>17 A. The door was open at this point. Clayton Fraser is now</p> <p>18 in the cell and so was DCM Steve Loughton.</p> <p>19 Q. Pause there. Clayton Fraser was engaged in constant</p> <p>20 supervision --</p> <p>21 A. Yes, sir.</p> <p>22 Q. -- of cell 7 at that point. Where had Steve Loughton</p> <p>23 come from?</p> <p>24 A. I don't know if he was working on the wing already or if</p> <p>25 he was perhaps in the wing office. As I say, my</p> <p style="text-align: center;">Page 96</p>

1 **attention, for most of the time that preceded this**
 2 **happening, was on the detainee in cell 8.**
 3 Q. Right. So there are two officers, one a DCM, one a DCO.
 4 **A. Yes, sir.**
 5 Q. That's the sight that greets you as you attend the cell.
 6 Where was 1527?
 7 **A. He was lying with his head by the toilet basin, so as**
 8 **I described yesterday, there's a kind of -- there's**
 9 **a wall that conceals the toilet, but there's a wide**
 10 **enough gap for a large person to walk through.**
 11 Q. Right.
 12 **A. The detainee D1527 was lying with his head by the toilet**
 13 **basin and his body coming out from the toilet area.**
 14 Q. How much of him was -- because of course we are going to
 15 see some of this on the footage, but some of it is hard
 16 to understand because of the nature of the filming. But
 17 how much of him was inside the toilet area and how much
 18 was outside? Was he up to his waist, as it were, or was
 19 it more or less?
 20 **A. Around the waist, I'd say.**
 21 Q. So his legs are sticking out into the room and his
 22 head's, what, somewhere near the toilet bowl?
 23 **A. Yes, sir, sounds about right.**
 24 Q. Right. What happens then?
 25 **A. DCM Loughton can see that the detainee is trying to**

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1 **strangle himself.**
 2 Q. How?
 3 **A. With, I think, a bed sheet or his -- or a piece of**
 4 **clothing.**
 5 Q. Was it tied to anything, do you know?
 6 **A. No, sir, it wasn't tied to anything.**
 7 Q. How was he trying to strangle himself with some ligature
 8 that wasn't attached?
 9 **A. Tying it around and pulling as hard as he could.**
 10 Q. Right.
 11 **A. Steve Loughton asked for someone to give him a fish**
 12 **knife. I think Clayton Fraser handed him a fish knife.**
 13 **And Steve Loughton managed to cut the ligature from**
 14 **around his neck and he kind of pulled him out of**
 15 **the toilet area and sat him on the bed.**
 16 Q. Yes. At this point, I'm looking at your statement, you
 17 recall that Loughton shouted something like, "Get
 18 staff", and did you do something about that?
 19 **A. Yes, sir, I left the cell and I shouted to Neeha to get**
 20 **staff, because that wouldn't have involved her leaving**
 21 **the constant supervision. She merely would have had to**
 22 **use her radio.**
 23 Q. Did more staff arrive?
 24 **A. Yes, sir.**
 25 Q. In the meantime, was Steve Loughton successful in

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1 getting the ligature from his neck?
 2 **A. He was, sir.**
 3 Q. What happened to 1527 then?
 4 **A. He was sat on the bed. He then -- he got up. He went**
 5 **into a kind of rage, clearly distressed and upset,**
 6 **saying that he was -- he would die, "Later, soon, now,**
 7 **I will die". He -- "I don't care if I die. I will die**
 8 **here tonight. Later, soon, now, I will die". He**
 9 **said -- he was shouting, "I asked nicely. I asked**
 10 **nicely for a TV. I asked nicely. Nothing, no", these**
 11 **sorts of things.**
 12 Q. What was his -- what was he complaining about? What did
 13 he want?
 14 **A. It was hard to know exactly, because his English wasn't**
 15 **great, or at least, whilst he was so angry, he was**
 16 **struggling to communicate.**
 17 Q. We saw on 24 April he certainly had wanted to go back
 18 onto C wing?
 19 **A. Yes, sir.**
 20 Q. Was that an issue, do you know, or --
 21 **A. Not that I'm aware of at the time, sir. It's possible,**
 22 **but it wasn't clear.**
 23 Q. Did any healthcare nurse turn up around this point?
 24 **A. Around this point, yes.**
 25 Q. Who?

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1 **A. I think it was Jo Buss, sir.**
 2 Q. Yes. So that's the first part of this trilogy of
 3 incidents because then there's a second part to it when
 4 he seems to swallow -- seems to swallow -- a mobile
 5 phone battery?
 6 **A. After his kind of -- after he -- the sort of rage that**
 7 **he seemed to go into, he did sit back down on the bed.**
 8 **He put a phone battery into his mouth.**
 9 Q. Did you see him do that?
 10 **A. Yes, sir.**
 11 Q. So you actually saw the battery go into his mouth?
 12 **A. Yes. They were quite bulky batteries.**
 13 Q. Where did he get the mobile phone?
 14 **A. He would have had a mobile phone.**
 15 Q. So it was his mobile phone?
 16 **A. Yes, sir. So he was sat on the bed. I managed to get**
 17 **myself into a position where I was sat on the bed**
 18 **opposite him. So I had a good vision of him and the**
 19 **cameras did too. He's trying to swallow the battery.**
 20 **At one point, he makes quite a serious attempt to**
 21 **swallow it and he spits in my face as a consequence of**
 22 **choking on the battery -- not deliberate, in terms of**
 23 **the spitting in my face.**
 24 Q. Yes.
 25 **A. By this point, DCM Nathan Ring's arrived, Nurse Jo Buss**

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25 (Pages 97 to 100)

1 is certainly there the. DCM Steve Loughton has left to
 2 go and fill out a use of force report because he had to
 3 use force on the detainee to stop him from
 4 self-strangling in the first place. DCM Nathan Ring
 5 starts saying that he will soon be bouncing around like
 6 a Duracell bunny. People were referring to him as
 7 a prick or a twat.
 8 Q. Did anybody try to persuade him to hand the battery over
 9 or --
 10 A. Yes, sir, Steve Loughton did.
 11 Q. And did he give the battery up, or do you know if it
 12 remained in his mouth?
 13 A. No, sir, he didn't give the battery up, as far as I'm
 14 aware, at this point.
 15 Q. There's talk, I think we will find, suggesting that
 16 either the battery wasn't in his mouth at all or it was
 17 found later by a drain near the toilet. Do you know
 18 about that?
 19 A. The battery was certainly in his mouth, sir.
 20 Q. But he must have released it at some point?
 21 A. Yes, sir, oh, definitely.
 22 Q. So the battery part of the incident, how long did that
 23 last for, roughly?
 24 A. Five minutes.
 25 Q. Yes?

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1 A. Five to ten minutes.
 2 Q. What's the next thing? Did things go quiet at that
 3 point?
 4 A. Things went a bit quiet and Clayton Fraser was left to
 5 continue observing him.
 6 Q. And where does everybody else go?
 7 A. I return to Neeha and say -- check that she's okay.
 8 Q. So you resume your duties on cell 8 --
 9 A. Well --
 10 Q. -- or wherever that detained man was?
 11 A. -- I intended to. I went to the bottom of the wing
 12 where the detainee was --
 13 Q. Yes.
 14 A. -- and he was being observed by Neeha.
 15 Q. Right.
 16 A. I asked Neeha if she wanted me to take over constant
 17 supervision of the detainee again, since I'd seen what
 18 had happened up there and things seemed to be calming
 19 down.
 20 Then it kind of appeared that things were still
 21 happening in the cell because Nathan Ring and the nurse,
 22 Jo Buss, were still lurking around up there and Neeha
 23 said she didn't mind continuing observing the detainee
 24 from cell 8, so I asked her if she was sure and she said
 25 she was, so I didn't take over constant supervision of

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1 the detainee in cell 8.
 2 I returned to room 7 and I was accompanied by
 3 Yan Paschali.
 4 Q. Yes. Where did he come from?
 5 A. Well, he was an E wing officer, so he was meant to be on
 6 the wing.
 7 Q. Sorry, I just missed that because I diverted myself.
 8 I had to ask one of my colleagues something. Can you
 9 just repeat, where did Paschali come from?
 10 A. It felt like he came from the wing office, or perhaps he
 11 may have just entered -- come onto -- he may have just
 12 come onto the wing from the --
 13 Q. What was it that was going on in the cell to attract his
 14 attention? What was happening at this point?
 15 A. Well, when I went back into the cell, upon returning to
 16 it, the detainee was back in the same position that I'd
 17 previously found him in, with his head by the toilet
 18 basin. At first, he wasn't trying to harm himself, but
 19 he was down there in the same position.
 20 Q. What was he doing this time?
 21 A. Well, at first, he was doing nothing, and I kind of
 22 lingered around outside the cell with the others at
 23 first. I asked the nurse, Jo Buss, what the deal was
 24 with him or what his problem was, and she said that the
 25 detainee is an arse. I asked the same question to

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1 Paschali, who said, "He's acting like a three-year-old".
 2 I shortly went into the cell and I was in there with
 3 Clayton Fraser, the nurse, Jo Buss, DCM Ring. DCM Ring
 4 made some more disparaging comments towards the detainee
 5 before he asked me if I would willing to continue
 6 observing the detainee under constant supervision.
 7 Clayton Fraser was also in there with me. My
 8 understanding is that he remained the sole person
 9 responsible for constantly observing him, but Ring
 10 wanted me to remain there as well.
 11 So there I was, stood at the entrance to the toilet
 12 area, with Clayton Fraser just behind me, looking at
 13 this detainee lying facedown with his head by the toilet
 14 basin.
 15 Soon he starts to choke himself with his hands,
 16 clearly intent on doing as much damage to himself as he
 17 possibly could. He was choking. You could hear him
 18 gasping for breath. Indeed, you can hear that in the
 19 undercover footage.
 20 I felt it was imperative for me to try and use force
 21 on D1527 to stop him from strangling himself, so I did.
 22 Q. What type of force was that?
 23 A. I put my hands onto his arms and tried to pull his arms
 24 away from his hands to stop him from strangling himself.
 25 Q. You mean his arms away from his neck?

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26 (Pages 101 to 104)

1 **A. His arms away from his neck, yes, sorry, sir. And, yes,**
 2 **I shouted for help. I said -- I was begging D1527 to**
 3 **stop. I said, "Please, stop. Don't do it, mate. Stop,**
 4 **please". I also pleaded with him before using force,**
 5 **but when it was clear that he was not listening to my**
 6 **request for him to stop harming, it then became**
 7 **necessary for me to use force on him. So I placed my**
 8 **hands onto his arms and pulled his arms away from his**
 9 **neck. I called for help. Charlie Francis then arrived.**
 10 Q. Had Charlie Francis been in there before?
 11 **A. No, he responded to my call for help.**
 12 Q. He is a, what, DCO?
 13 **A. He may have been in and around the incident at times,**
 14 **but, at that specific moment, he wasn't in the room.**
 15 Q. He is a DCO, is he?
 16 **A. Yes, sir. So I took control of the detainee's left arm,**
 17 **Charlie Francis took control of his right arm and**
 18 **Clayton Fraser took control of his legs. The three of**
 19 **us managed to successfully prevent the detainee from**
 20 **harming himself, and he was clearly intent on doing**
 21 **that, especially --**
 22 Q. Was he pulled out of the toilet area?
 23 **A. Yes, we pulled him out of the toilet area into the**
 24 **middle of the cell with his -- and he was laying on his**
 25 **back.**

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1 Q. Yes.
 2 **A. So I kind of had his -- control of his left arm. I was**
 3 **just holding it in a sort of -- just holding it sort of**
 4 **to the ground. Charlie was doing the same with the**
 5 **right arm. Clayton was in control of the legs.**
 6 **He wasn't -- I mean, it all happened pretty quickly.**
 7 **He wasn't, you know, resisting us strongly. But Yan**
 8 **soon joined the restraint. Given that he wasn't**
 9 **resisting very strongly, we were able to kind of just**
 10 **kind of moderate the -- you know, at first, we had to --**
 11 **you know, you had to pull his arms away from his neck to**
 12 **stop him from strangling but, once you had him on his**
 13 **back, you didn't need to apply any great force to stop**
 14 **him. We just held him in position so that he was not**
 15 **choking himself.**
 16 **So we didn't really need to apply much force at that**
 17 **point at all. And indeed we didn't.**
 18 **But Paschali soon joined the restraint, and he knelt**
 19 **down with his legs either side of D1527's head. He**
 20 **placed his fingers around his neck and his thumbs on his**
 21 **Adam's apple. This clearly caused distress to D1527 and**
 22 **he began to resist.**
 23 Q. Tell us, as you have that in mind, and as that hold that
 24 Yan Paschali had of his neck, just focusing on 1527's
 25 face, which I'm hoping we are going to see in an

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1 unpixelated version of the footage we saw before, if
 2 that's going to be ready to play, what signs of distress
 3 were there on his face from what was going on, from the
 4 hold that Yan Paschali had around his neck? How were
 5 his eyes? What was the colour of his face? What was he
 6 doing?
 7 **A. Well, initially -- well, I mean, after Yan choked the**
 8 **detainee --**
 9 Q. Well, it was during -- no, during. While that was going
 10 on. How were his eyes? How was he looking?
 11 **A. Are you talking about before the choke?**
 12 Q. No, during it. During it.
 13 **A. Oh, right, yes. Well, yes, Yan had his thumbs on his**
 14 **Adam's apple and he applied an incredible amount of**
 15 **force onto his airways, and D1527 fell silent. His face**
 16 **appeared to kind of redden. His eyes were bulging -- at**
 17 **least that's how I remember things. Yan said to him,**
 18 **"Don't you fucking move, you fucking piece of shit. I'm**
 19 **going to put you to fucking sleep". This lasted, I'd**
 20 **say, at least six seconds.**
 21 Q. What, the pressure?
 22 **A. The pressure, yes. The pressure that -- I mean, his**
 23 **hands were around his throat and were on his throat for**
 24 **quite a long time. It was when -- it was when the**
 25 **detainee started to resist that the pressure was**

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1 **applied.**
 2 Q. How did he resist? Verbally or physically?
 3 **A. He couldn't resist verbally, sir, because he was being**
 4 **strangled. He couldn't speak.**
 5 Q. Yes.
 6 **A. He physically was trying to move around.**
 7 Q. Obviously, we are going to see this, and we see you at
 8 that point saying, "Yan, easy, easy"?
 9 **A. Yes, sir, it was at that point that I worried that the**
 10 **detainee was at imminent risk of serious, serious harm.**
 11 Q. What did you think Yan was going to do?
 12 **A. I thought Yan would kill him, sir. He seemed intent on**
 13 **killing him. You know, my inference from him saying he**
 14 **was going to put him to sleep was a threaten to kill**
 15 **him -- was a threat to kill him, sorry, and so I had to,**
 16 **despite the risk that this posed to my cover, say, "Yan,**
 17 **Yan, easy, easy".**
 18 Q. Did he release the pressure when you said those words?
 19 **A. As soon as I intervened, he stopped.**
 20 Q. We know -- I'm going to take this quickly now, because
 21 we can -- we'll look at the footage. I'm simply picking
 22 up this from what you said in your police statement,
 23 that Yan released the pressure from his neck, Jo Buss
 24 was stood just behind inside the door?
 25 **A. Yes, sir.**

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27 (Pages 105 to 108)

<p>1 Q. And not being unkind to her, you say in your police 2 statement it's possible she might not have seen the 3 choke because of the way that Yan had positioned 4 himself, and it's sometimes difficult to orientate 5 yourself with the footage, but did he have his back 6 towards the door?</p> <p>7 A. Yes, sir, he did, and he was leant over the detainee 8 with his arms spread wide, so ...</p> <p>9 Q. But you say:</p> <p>10 "As Yan eased off, D1527 started to make sounds. It 11 sounded as though he was choking on the froth coming 12 from his mouth. He started to talk but his voice 13 sounded odd. He was struggling to communicate, trying 14 to get his breath back, chest heaving, as he was gasping 15 for breath, while at the same time trying to complain 16 about his neck."</p> <p>17 A. Yes, sir.</p> <p>18 Q. That's when you say:</p> <p>19 "I genuinely had thought Yan was going to kill him." 20 And then he's rolled into the recovery position, and 21 then we'll see certain other interventions, he's called 22 a tool, an idiot, "We are bored with this", "Are you 23 a man or a mouse", all of that kind of thing?</p> <p>24 A. Yes, sir.</p> <p>25 Q. At the end of it, we see a conversation that you have</p> <p style="text-align: center;">Page 109</p>	<p>1 A. So Steve Loughton acted properly with regard to filling 2 out a use of force report. That was one instance of use 3 of force.</p> <p>4 Q. Yes.</p> <p>5 A. He filled out a use of force report, as was expected. 6 The detainee -- when the detainee placed the battery 7 into his mouth, no force was used, so there was no need 8 for a use of force report.</p> <p>9 Q. Exactly.</p> <p>10 A. Of course, later on, when we restrained D1527, a use of 11 force should have been submitted.</p> <p>12 Q. So there should have been a separate --</p> <p>13 A. That was a separate use of force -- a separate use of 14 force, sir, yes, and, as such, a separate use of force 15 report should have been submitted. I don't know how he 16 got, or if he got -- I'd be interested to know if 17 Clayton Fraser or Charlie Francis filled out a use of 18 force report. I don't think a use of force report was 19 ever filled out.</p> <p>20 Q. We only have the one, and we will look at it a little 21 later. But I just want to go back to something we 22 looked at earlier. Can we put up, please, on the screen 23 again <CJS001085> at page 17, please.</p> <p>24 If we can highlight the top half, please, expand the 25 top half, do you remember we looked at this a little</p> <p style="text-align: center;">Page 111</p>
<p>1 about whether any use of force report should be 2 completed. One conversation was with Yan?</p> <p>3 A. Yes, sir.</p> <p>4 Q. What did he tell you and what did you understand by it?</p> <p>5 A. Yan approached me and said that that wasn't a use of 6 force. He said, "Listen, that wasn't a use of force", 7 and then he said to me that, as it stood, there would be 8 no use of force report.</p> <p>9 Q. Yes.</p> <p>10 A. That was a clear instruction that we should cover up 11 what had happened.</p> <p>12 Q. Jo Buss effectively repeated the same --</p> <p>13 A. Jo Buss --</p> <p>14 Q. -- right towards the end, that Yan had said, "No use of 15 force report", so she was going to write up the minimum?</p> <p>16 A. She conspired in the coverup, yes, sir.</p> <p>17 Q. Ought there to have been a separate use of force report 18 for this incident? We know, because you have told us, 19 and there is one, and we will look at it, that 20 Steve Loughton went off to make a use of force report 21 for the first of these three incidents. The second 22 incident, the battery in the mouth, did that warrant, in 23 your judgment, a separate use of force report or was 24 that not a use of force around the battery incident 25 itself?</p> <p style="text-align: center;">Page 110</p>	<p>1 earlier, 25 April, 19:01:</p> <p>2 "D1527 kicking and banging door."</p> <p>3 That must be perhaps the second part of the incident 4 that you heard?</p> <p>5 A. Yes, sir.</p> <p>6 Q. Then at 19:40, in different handwriting:</p> <p>7 "Seen in room 7. Constant watch. D1527 had tied 8 a T-shirt around his neck, angry - upset ..."</p> <p>9 So that's the first part, is it?</p> <p>10 A. Yes, sir.</p> <p>11 Q. "... had mobile phone battery in his mouth. Attempted 12 to self-strangulate in toilet."</p> <p>13 So you've got the three parts of the incident there:</p> <p>14 "Visual observations only due to demeanour. 15 Resp 16."</p> <p>16 Whatever that means. Responder, perhaps?</p> <p>17 A. I don't know, sir. Perhaps.</p> <p>18 Q. Do you regard that, from the experience you have of 19 completing forms like this, as being complete insofar as 20 what had happened during the course of that evening?</p> <p>21 A. No, sir.</p> <p>22 Q. Should it have been fuller?</p> <p>23 A. Yes, sir.</p> <p>24 Q. For example, it doesn't mention any use of force?</p> <p>25 A. Precisely, sir.</p> <p style="text-align: center;">Page 112</p>

28 (Pages 109 to 112)

1 Q. We have only one use of force form, and that relates to
 2 the first part of this incident. There is none for the
 3 latter part, the third of these three separate incidents
 4 around the same time. As I say, we will come to look at
 5 it a little later.
 6 Let's play, then, please, the relevant footage.
 7 I will come back to aspects of what is said, and I will
 8 come back to ask you about certain other things which
 9 follow on from the events on 25 April, once we have gone
 10 through all of that.
 11 Can we put up, please, on screen KENCOV1007 and it
 12 is clip V2017042500020, beginning at 8.47. We saw this
 13 during the course of the opening statement. Can I make
 14 clear, in terms of other footage -- I'm not going to
 15 play everything or everything of everything, because we
 16 have seen a lot of it already, and in order to save some
 17 time. But this I am going to play. Thank you. Can we
 18 play it.
 19 (Video played)
 20 MR ALTMAN: Can we keep the image on the screen. Are you
 21 able to scroll back just a little, please. A bit more.
 22 No, more. Right, pause there for a moment.
 23 Mr Tulley, while we have got this on, and because it
 24 is the first opportunity with you, rather than going
 25 into the detail for the moment, the door that we see on

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1 the left with the glass in it, is that the viewing panel
 2 to one of the cells?
 3 A. Yes, sir.
 4 Q. We can see in the ceiling there are sort of mirror-type
 5 objects. Is that so that you have a complete 360 of
 6 the room if you're observing from outside?
 7 A. Yes, sir.
 8 Q. I wonder if we can just scroll back a little more.
 9 More, more. Stop. Pause there. Let's be clear.
 10 Cell 7, do you see where that screen is?
 11 A. On the left, sir, yes.
 12 Q. On the left. Cell 7 would be on the left --
 13 A. Yes, sir.
 14 Q. -- just out of picture? In relation to that, so that we
 15 are absolutely clear, where is cell 8? Is it behind us
 16 as we look --
 17 A. No, sir, it is on the right. You can see the door is
 18 open.
 19 Q. So that's cell 8 on the right?
 20 A. Yes, sir.
 21 Q. So that's where you were keeping constant observations?
 22 A. Yes, sir.
 23 Q. That gate at the back behind the nurse, what is that?
 24 A. Once you open that gate and the locked door immediately
 25 behind it, that's -- you're in the block.

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1 Q. The CSU?
 2 A. Yes, sir.
 3 Q. We can see the green paint, which may or may not be
 4 colour coding for E wing. Let's see if we can turn
 5 around because, at this point, you walk up and down the
 6 wing and there may be some other things that we can pick
 7 out here. Can we just scroll back as slowly as you can.
 8 So we have got a better view now towards the back end,
 9 the CSU end, of the wing; yes?
 10 A. Yes, sir.
 11 Q. Is that right?
 12 A. Yes, sir.
 13 Q. The reason I asked you about cells 7 and 8 is because we
 14 seem to have another door here with a big viewing pane.
 15 What is that that we have an image under the screen, the
 16 TV screen?
 17 A. It's a cell. I think it looks like it might be cell 2.
 18 It's not the same size as the viewing pane, but it is
 19 slightly different to the normal cells in the other
 20 wings. It's like somewhere -- it's not as big as the
 21 big windows but it's not as small as the small viewing
 22 panels.
 23 Q. But that's definitely not cell 8?
 24 A. That's definitely not cell 8.
 25 Q. People. There was a nurse in nurse's uniform who turned

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1 up after Jo Buss and goes in the room to speak to 1527.
 2 Who was she?
 3 A. I don't know her name, sir.
 4 Q. But she was from healthcare?
 5 A. Yes, sir.
 6 Q. We see at one point outside the cell a taller lady,
 7 apparently also in uniform, wearing glasses. Who was
 8 she?
 9 A. She was also a nurse, sir.
 10 Q. Her name?
 11 A. I don't know, sir. You're referring to the blonde girl?
 12 Q. Yes.
 13 A. Yes, sir.
 14 Q. There was also a woman who you speak to towards the end
 15 of the clip and you're having a conversation. Is that
 16 Neeha?
 17 A. Yes, sir.
 18 Q. We also see the servery, don't we?
 19 A. We do, sir.
 20 Q. I wonder if we could just scroll back and maybe pick
 21 that up. That's Neeha?
 22 A. That's the servery there.
 23 Q. So we have got the shutters, and all of the wings have
 24 those, so that's the servery, where the detained men
 25 would queue up for their food?

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29 (Pages 113 to 116)

<p>1 A. Yes, sir.</p> <p>2 Q. Was it the same size as on other wings, this one, or</p> <p>3 were some of them bigger than others?</p> <p>4 A. This is slightly smaller than the ones in the other</p> <p>5 wings.</p> <p>6 Q. I'm not sure there's anything else that I particularly</p> <p>7 want to pick out from the imagery.</p> <p>8 What I do want to ask you, before we move on to the</p> <p>9 next piece of footage, is this, and I can do it from</p> <p>10 a transcript that we have. Chair, for you, at B/11, and</p> <p>11 if we can put up on screen <TRN0000001>. I just want to</p> <p>12 pick up some of the words. We saw them subtitled.</p> <p>13 That's the relevant transcript for what we have just</p> <p>14 been looking at. You see right at the top of the page,</p> <p>15 on page 1, this is the point where you say, "Get staff".</p> <p>16 Do you see, right at the top?</p> <p>17 A. Yes, sir.</p> <p>18 Q. Then it goes on:</p> <p>19 "Get staff in here."</p> <p>20 We are looking down the columns on these</p> <p>21 transcripts, this particular style. So it's:</p> <p>22 "Get staff.</p> <p>23 "Get staff in here.</p> <p>24 "... We need someone. Get someone from the office,</p> <p>25 Nehar.</p> <p style="text-align: center;">Page 117</p>	<p>1 "Just tied something round his neck. He's got</p> <p>2 a battery. Give me the battery. Don't put it in your</p> <p>3 mouth? He's got a battery in his mouth.</p> <p>4 "He's got a battery in his mouth."</p> <p>5 On page 5, in the left-hand column, at line 12,</p> <p>6 Steve Loughton:</p> <p>7 "Take that out of your mouth and talk to the nurse."</p> <p>8 You say, "Don't swallow it". Loughton:</p> <p>9 "Now, what do we do, just sit here all flipping</p> <p>10 night? Take the battery out of your mouth. It isn't</p> <p>11 going to get you out of this wing, is it?"</p> <p>12 This is how it reads at line 42:</p> <p>13 "When all we do is stuff like this, the longer</p> <p>14 you're going to stay in here."</p> <p>15 And line 49, right-hand column:</p> <p>16 "Take it out your mouth."</p> <p>17 Then on page 6, please, Jo Buss says at the top:</p> <p>18 "What's all this about? What's happening ...?"</p> <p>19 Line 11:</p> <p>20 "Could be a late one ..."</p> <p>21 Then at 33:</p> <p>22 "Could be a late one and all" -- he says at line 22:</p> <p>23 "Could be a late one and all."</p> <p>24 And then at 33:</p> <p>25 "The use of force flipping paperwork ..."</p> <p style="text-align: center;">Page 119</p>
<p>1 "Steve Loughton: ... fish knife. Here, give us."</p> <p>2 He is clearly asking for the fish knife at that</p> <p>3 point. On the right column at the top:</p> <p>4 "I've got it off his head. It's all right, I've got</p> <p>5 it off his head."</p> <p>6 That's clearly a reference to Steve Loughton having</p> <p>7 got the ligature off his neck. Then, further down at</p> <p>8 the bottom, and we have seen this and we have heard it,</p> <p>9 but I'm just picking out a few aspects of it:</p> <p>10 "What's in your mouth? Sit down."</p> <p>11 That's right at the bottom of that page. At the top</p> <p>12 of the next, Charlie Francis:</p> <p>13 "What's in your mouth?"</p> <p>14 And he repeats that. At the bottom:</p> <p>15 "How did he get in there? We didn't see him."</p> <p>16 Whether that's a correct translation or whether it's</p> <p>17 "How did it get in his mouth", but it almost seems</p> <p>18 certain it's a reference to the battery at that point?</p> <p>19 A. Yes, sir.</p> <p>20 Q. Then we have D1527 at the foot of the right-hand column</p> <p>21 on page 2, saying, as you have already told us, "I will</p> <p>22 die" and he carries on saying that on page 3, "I will</p> <p>23 die now" and on the right-hand column of page 3,</p> <p>24 Steve Loughton is talking, saying in the top right of</p> <p>25 the right-hand column:</p> <p style="text-align: center;">Page 118</p>	<p>1 So you said he went off to do the right thing, but</p> <p>2 that's his reference to it. Then, at the top of</p> <p>3 the next column, at line 49:</p> <p>4 "... a battery in his mouth, the cock."</p> <p>5 Nathan Ring then intervenes:</p> <p>6 "Has he?"</p> <p>7 Someone says, "He swallowed it".</p> <p>8 Ring, at line 65:</p> <p>9 "Going all night, isn't he?"</p> <p>10 At 75:</p> <p>11 "Going all night, Duracell bunny, isn't he?"</p> <p>12 At 86 and 87, Nathan Ring:</p> <p>13 "Swallowing batteries? You're full of it."</p> <p>14 92:</p> <p>15 "Burn his tongue."</p> <p>16 And then, at the foot of page 7, at line 47:</p> <p>17 "... a child, you know ... which isn't going to</p> <p>18 happen."</p> <p>19 Is what he appears to say. Towards the foot of</p> <p>20 the right-hand column on page 7, at line 90:</p> <p>21 "He's just a dick."</p> <p>22 On page 9, at line 27:</p> <p>23 "Bellend might be off my wing."</p> <p>24 So whoever staffer 3 was, he's referring,</p> <p>25 presumably, to 1527 being a bellend "might be off my</p> <p style="text-align: center;">Page 120</p>

<p>1 wing". Was that a reference to E wing or another wing, 2 do you know? 3 A. I think maybe he was thinking that they'd move him 4 somewhere else and so he'd be rid of him. I imagine 5 that member of staff was working on E wing. 6 Q. Then on page 11, please, in the right-hand column at 7 line 66, Nathan Ring says: 8 "... He ain't got a battery in his mouth had he -- 9 nah I said to you it's all good. He put the battery 10 round his mouth and pretended to chew it up. And when 11 I checked it, it was all in the drain. He picked it up, 12 put it round his face." 13 At line 91: 14 "... chunked it all down the drain to look like he'd 15 [inaudible] the toilet." 16 That's why I asked you a little earlier. You said 17 you had no doubt that he'd actually put it in his mouth. 18 A. Yes, sir. 19 Q. Nathan Ring seems to be suggesting it was all a bit of 20 a pretence? 21 A. Nathan Ring wasn't there at the start of the incident, 22 sir. 23 Q. Then on the next page, page 12, Yan Paschali talks about 24 the battery at line 25: 25 "Fucking news flash, he won't stop."</p> <p style="text-align: center;">Page 121</p>	<p>1 1527 would by now be unpixelated. I'm afraid it isn't. 2 So at some future time -- I don't know when -- we will 3 have to play perhaps at least part of it in open 4 session, but now is not that time. It is not ready; 5 I don't know why. 6 THE CHAIR: Thank you. 7 (Video played) 8 MR ALTMAN: We can see the time, can't we, Mr Tulley, on the 9 clock there? It is about 7.30? 10 A. Yes, sir. 11 (Video played) 12 MR ALTMAN: Mr Tulley, a few things arising out of that, 13 please. We see, and we can put up on screen, the 14 transcript that goes alongside that particular footage, 15 which is <TRN0000002>. Chair, for you, it's behind 16 B/12. I'm only going to skate through some of 17 the highlights, if you like, but on page 2 at the top, 18 at line 51, we saw subtitles and we heard her say it, 19 Jo Buss: 20 "He's an arse, basically. He can't get what he 21 wants." 22 And at line 66: 23 "He can't get what he wants and I can't get [it 24 should read 'what'] he wants." 25 A. Yes.</p> <p style="text-align: center;">Page 123</p>
<p>1 Then Yan Paschali: 2 "He's going to start shouting and screaming." 3 We saw that on the footage. That's all I'm going to 4 ask about that transcript from that footage. 5 Chair, the next clip is about 27 minutes long, so, 6 again, slightly early, but now is as good a time as any 7 to take our break. 8 THE CHAIR: Agreed, thank you. We will return at 3.15 pm. 9 Thank you very much. 10 (3.00 pm) 11 (A short break) 12 (3.19 pm) 13 MR ALTMAN: Thank you. Can we now play 14 KENCOV1007 V2017042500021 right from the beginning. Can 15 I say, before we do play it, while the evidence handler 16 is finding it, chair, obviously this is arguably the 17 most distressing footage that we will be playing and, 18 therefore, if anybody is uncomfortable with that or is 19 likely to be distressed, it's just my cautionary note to 20 them that, if they don't want to watch it, then they are 21 free to leave; if they do, then they should understand 22 that it will be distressing footage. 23 THE CHAIR: Absolutely. Thank you, Mr Altman. 24 MR ALTMAN: Can I also say that I had hoped, when I made my 25 opening statement last week, that the footage regarding</p> <p style="text-align: center;">Page 122</p>	<p>1 Q. Then on page 5, we have Nathan Ring in the right-hand 2 column at line 75 saying: 3 "If he's sucking a battery, he's sucking a battery. 4 So, he wants to use it as his dummy, fine, I'm okay with 5 that." 6 And that's where, at the bottom, he says: 7 "Do you want to watch him for a bit, Callum." 8 As you've told us, that was what you did. At the 9 top of page 6: 10 "Yeah. All right, I'll watch him." 11 And at line 23 is when, clearly, he starts 12 self-strangulating and you intervene, telling him, 13 amongst other things, to stop it, "Mate, don't -- don't 14 do that. Don't do that". At page 7 of the transcript, 15 top right, he, Paschali, having told 1527 to relax, at 16 the top: 17 "You fucking ... you fucking piece of shit because 18 I'm going to put you to fucking sleep." 19 When you intervene and say: 20 "Yan? Yan? Easy." 21 Tell us this, Mr Tulley: how confident could anyone 22 be, at the point at which Yan Paschali was kneeling over 23 him with his neck in his hands, that 1527 didn't have 24 the battery in his mouth? Do you understand my 25 question? While Paschali's got his hands around the</p> <p style="text-align: center;">Page 124</p>

<p>1 man's neck, he can still have a battery in his mouth and</p> <p>2 choke on it while he's being throttled, as you put it.</p> <p>3 How confident was anybody that the battery was out of</p> <p>4 his mouth, or wasn't still there, at that point?</p> <p>5 A. I didn't think the battery was in his mouth at this</p> <p>6 point, sir.</p> <p>7 Q. What about Paschali? Could he possibly have known one</p> <p>8 way or the other? Had it been made clear that the</p> <p>9 battery was not in his mouth anymore?</p> <p>10 A. It hadn't been made clear, but it was clear.</p> <p>11 Q. How was it clear?</p> <p>12 A. Well, because he was heaving, he was gasping for breath</p> <p>13 as he was strangling himself. We know, because of what</p> <p>14 Nathan said, that, later on, the battery appeared to be</p> <p>15 by the drain.</p> <p>16 Q. I'll tell you why I ask. If we look at the sequence</p> <p>17 just on this right-hand column, we've got Paschali</p> <p>18 saying, "You fucking piece of shit" and we know he says</p> <p>19 that when he's got his hands around 1527's neck. Then</p> <p>20 you intervene saying, "Yan, easy". Then you've got</p> <p>21 Charlie Francis at 67 saying, "Did he swallow the</p> <p>22 battery?" Well, it wasn't clear to Charlie Francis that</p> <p>23 the battery was out of his mouth.</p> <p>24 A. Well --</p> <p>25 Q. Then staffer 4, whoever that is, says, "No, no, it's</p> <p style="text-align: center;">Page 125</p>	<p>1 how confident I was.</p> <p>2 Q. You were confident he no longer had it in his mouth?</p> <p>3 A. Yes, sir.</p> <p>4 Q. Why was that? Why were you confident it was no longer</p> <p>5 in his mouth?</p> <p>6 A. Because I had seen him by the toilet basin heaving,</p> <p>7 strangling himself. Would you be choking yourself with</p> <p>8 a battery in your mouth whilst trying to swallow</p> <p>9 a battery? I don't see how that would be an effective</p> <p>10 form of self-harm, sir.</p> <p>11 Q. You're talking about a man who is rational and thinking</p> <p>12 through what's going on, but this was a very vulnerable,</p> <p>13 mentally ill man, wasn't it?</p> <p>14 A. Yes, sir, and I'm not saying I was right. I just didn't</p> <p>15 think the battery was in his mouth. I may have been</p> <p>16 wrong.</p> <p>17 Q. Page 8. Charlie Francis says:</p> <p>18 "You're going to stop being a tool now ... stop</p> <p>19 being an idiot."</p> <p>20 As we saw several times, it was he who was saying,</p> <p>21 "We're getting bored with this" or "It's becoming</p> <p>22 boring". But on page 9, at line 13, you say:</p> <p>23 "It would be nice if we had a manager in."</p> <p>24 Why did you say that?</p> <p>25 A. Because I wanted another member of staff to be there,</p> <p style="text-align: center;">Page 127</p>
<p>1 here". My point is, therefore, could anybody be</p> <p>2 confident, at the point at which Paschali is leaning</p> <p>3 over D1527 and with his hands around his neck, that he</p> <p>4 no longer had the battery in his mouth?</p> <p>5 A. Sir, Francis, Charlie Francis, asking if he swallowed</p> <p>6 the battery is -- I have always taken that to be some</p> <p>7 form of cover because he's seen Paschali choke the</p> <p>8 detainee, and if he was going to have to at some point</p> <p>9 justify and cover for Paschali's actions, because at</p> <p>10 that point we didn't know there wasn't going to be any</p> <p>11 sort of use of force report documented, so perhaps that</p> <p>12 might be used at some point to attempt to justify the</p> <p>13 application of force to the detainee's neck as if it</p> <p>14 were some attempt to get the battery out of his mouth.</p> <p>15 Q. But you understand my point? You know, that aside,</p> <p>16 whether you're right or wrong about whether</p> <p>17 Charlie Francis was engaging in some quick-thinking</p> <p>18 coverup of what Paschali was doing, whether people were</p> <p>19 confident at the time he's being throttled -- because</p> <p>20 it's important. If he still had the battery in his</p> <p>21 mouth, he could certainly have died. That's why I'm</p> <p>22 asking you, how confident could people be that he no</p> <p>23 longer had the battery in his mouth, at that point,</p> <p>24 until it was found later by a drain?</p> <p>25 A. I can't speak for the other officers. I can only say</p> <p style="text-align: center;">Page 126</p>	<p>1 sir.</p> <p>2 Q. But of manager level?</p> <p>3 A. Yes.</p> <p>4 Q. Because? What difference would a manager have made?</p> <p>5 A. It was just another witness to the incident.</p> <p>6 Q. At the end of it, we know you go off to the toilet. We</p> <p>7 see what happens there, where you become upset. You</p> <p>8 come out. Page 12, line 19:</p> <p>9 "Fuck off, don't touch my phone."</p> <p>10 You've explained all of that. Then on page 14, at</p> <p>11 line 18, Yan Paschali:</p> <p>12 "As it stands, no use of force ..."</p> <p>13 You confirm that:</p> <p>14 "No use of force report?"</p> <p>15 Then on page 15:</p> <p>16 "Are they putting that down as a restraint?", says</p> <p>17 Jo Buss at line 59, and you say:</p> <p>18 "I think, as it stands, according to what Yan just</p> <p>19 told me, they're going to leave it. I don't know,</p> <p>20 though. You will have to speak to Yan."</p> <p>21 You say at the bottom:</p> <p>22 "It's going to be down to Dixie, really. I'm not</p> <p>23 sure."</p> <p>24 Who were you talking about?</p> <p>25 A. DCM Steve Dix, sir.</p> <p style="text-align: center;">Page 128</p>

<p>1 Q. What was going to be down to him?</p> <p>2 A. Well, I wasn't -- what I was trying to do here was</p> <p>3 just -- it was a deployment of an undercover tactic in</p> <p>4 which I was putting the responsibility onto a manager</p> <p>5 rather than myself being responsible, because, I mean,</p> <p>6 I was -- I was kind of being asked about wrongdoing and</p> <p>7 I didn't want to encourage any form of wrongdoing, so</p> <p>8 I -- I put -- I deflected the question.</p> <p>9 Q. Then on page 16, and the final page of this transcript,</p> <p>10 Jo Buss at the top, line 6:</p> <p>11 "I can't write anymore anyway because Yan's not</p> <p>12 going to let me", she says:</p> <p>13 "I can't even write.</p> <p>14 "...</p> <p>15 "A T-shirt around his neck, angry and upset, he</p> <p>16 made", then she continues, "Phone battery in his mouth.</p> <p>17 Attempted to self-strangulate on toilet ... observations</p> <p>18 only due to demeanour."</p> <p>19 She seemed to be reading from something when she was</p> <p>20 saying that to you. Had she already written something</p> <p>21 down?</p> <p>22 A. Yes, I think so. I think so. I think so. It sounds</p> <p>23 like it. And earlier, when we were looking over the obs</p> <p>24 on the constant supervision --</p> <p>25 Q. This is what I'm going to ask you.</p> <p style="text-align: center;">Page 129</p>	<p>1 15 minutes or so?</p> <p>2 A. Yes, thank you, chair.</p> <p>3 MR ALTMAN: At the top, and this is just a little later, but</p> <p>4 it is on the same day, and you're speaking to Paschali</p> <p>5 at this point:</p> <p>6 "Are we doing use of force?"</p> <p>7 You say:</p> <p>8 "Yan, that come from Dixie, so that's cool."</p> <p>9 What were you saying there?</p> <p>10 A. My understanding is that Yan was consulting -- was going</p> <p>11 to consult Steve Dix, DCM Dix, about whether or not we</p> <p>12 were going to have to -- or going to submit a use of</p> <p>13 force. So my impression was that Paschali consulted him</p> <p>14 in some form.</p> <p>15 Q. So are you saying that Steve Dix sanctioned the absence</p> <p>16 of a use of force report, from what you understood?</p> <p>17 A. From what I understood, sir, yes.</p> <p>18 Q. Then you have a bit of an exchange about biceps and</p> <p>19 Paschali telling you how much he weighs. Were you</p> <p>20 trying to explain to him why you found it so difficult?</p> <p>21 A. He could tell I was struggling after the incident and he</p> <p>22 was saying that I needed to go to the gym. I was</p> <p>23 saying, jokingly, that I've still got biceps.</p> <p>24 Q. Then you say on the right-hand side, at line 61:</p> <p>25 "You didn't see how long I was trying to get him out</p> <p style="text-align: center;">Page 131</p>
<p>1 A. It sounds very familiar, sir.</p> <p>2 Q. Because it's pretty similar to what we read in that</p> <p>3 observation at 19:40 on 25 April on that document?</p> <p>4 A. Yes, sir.</p> <p>5 Q. Perhaps "Resp", maybe it does refer to her. Maybe we</p> <p>6 can discover that from another source:</p> <p>7 "[So] that's all I can say", she said. "He still</p> <p>8 hasn't been done properly ..."</p> <p>9 What does that mean, "He still hasn't been done</p> <p>10 properly". Any idea? Does she mean the use of force</p> <p>11 report? I know it's her words, not yours, but you were</p> <p>12 involved in the conversation?</p> <p>13 A. Yes, sir, but I'm not sure, I'm sorry.</p> <p>14 Q. You say, "I don't know". She says, "I'll go and write</p> <p>15 the War and Peace upstairs". What War and Peace was she</p> <p>16 going to write, having already considered that there</p> <p>17 wasn't anything to write?</p> <p>18 A. I'm not sure, sir.</p> <p>19 Q. Moving on to another transcript, a very short one,</p> <p>20 <TRN0000003>. Chair, I wonder if we might just sit</p> <p>21 another quarter of an hour or so, because I'd quite like</p> <p>22 to finish this topic and we can move on tomorrow?</p> <p>23 THE CHAIR: Yes, absolutely. Agreed.</p> <p>24 MR ALTMAN: <TRN0000003>.</p> <p>25 THE CHAIR: Mr Tulley, are you okay to continue for another</p> <p style="text-align: center;">Page 130</p>	<p>1 of the toilet."</p> <p>2 And he says:</p> <p>3 "Well, I didn't see that part of it."</p> <p>4 You say:</p> <p>5 "You didn't, mate. Oh, fucking hell, I've never."</p> <p>6 Then he says:</p> <p>7 "Cracked him one in the ribs to soften him up.</p> <p>8 That's what you've got to do."</p> <p>9 What was he advising you to do?</p> <p>10 A. Punch him in the stomach.</p> <p>11 Q. In other words, what, to make it easier for yourself to</p> <p>12 restrain someone? Was that the effect of what he was</p> <p>13 saying?</p> <p>14 A. Yes, sir.</p> <p>15 Q. Let's put up on screen, please, the use of force form.</p> <p>16 It's B/24 for you, chair, <CJS005534>, please. We have</p> <p>17 to remind ourselves this form relates only to the first</p> <p>18 part of the incident. This is the use of force, the</p> <p>19 relevant form, for the first part of the incident. It</p> <p>20 is the first time that we have looked at one of these.</p> <p>21 We can see at the top it calls itself a use of force</p> <p>22 DCF 2, and beneath it, it says "DC Rule 41". So it</p> <p>23 refers to rule 41 of the Detention Centre Rules. It's</p> <p>24 got the G4S logo on it, and in this case the date on</p> <p>25 which force was used, 25 April. There is a log number,</p> <p style="text-align: center;">Page 132</p>

<p>1 time use of force commenced, 19:09, and completed 2 a minute later at 19:10. It relates, of course, to 3 D1527. 4 On the right-hand box: 5 "Were ratchet handcuffs used? No." 6 Beneath that: 7 "Hand-held camcorder/body worn camera used?" 8 No in both instances. We can scroll down to the 9 second half, please: 10 "Reason for force being used?" 11 Tick "Prevent self-harm". "Unplanned" on the right: 12 "Did a member of healthcare attend to the detainee". 13 "After the incident" is ringed. 14 "Is the detainee on ACDT", and that is ringed and 15 somebody has written "constant supervision". "Room 16 clearance and certification completed?". "No". Then we 17 have the box below and the times that various people 18 were informed of the use of force, the duty director, 19 Home Office, healthcare, IMB and the care team and in 20 each case it is Steve Loughton informing others of, 21 presumably, the use of force and the reasons for it. Is 22 that what your understanding is? 23 A. Yes, sir. 24 Q. Then, please, over the page, page 2, we have a pro forma 25 type of form. At the top is the time and the date, the</p> <p style="text-align: center;">Page 133</p>	<p>1 Q. So it was the next best thing, was it? 2 A. It was the next best thing, yes. 3 Q. "Were handcuffs applied: No." 4 "Was a baton drawn: No." 5 Do you remember I asked you a little earlier whether 6 in circumstances of planned incidents, where you're all 7 kitted up, batons were used? There's a reference on 8 this form to a baton. Had you ever seen batons used? 9 A. No, sir. 10 Q. Had you ever seen batons carried by The Nationals when 11 they would come in? Did they ever have those kind of 12 objects? 13 A. I only saw The Nationals come in once. I didn't see 14 a baton. 15 Q. Do you understand why there is reference in -- albeit it 16 is a pro forma, why there's reference to a baton and the 17 drawing of a baton? 18 A. No, sir. 19 Q. Let's go to the next page, page 3. At the top: 20 "The use of force was authorised by ..." 21 In this case, Steve Loughton, DCM. And the reasons: 22 "To prevent self-harm as he was self-strangling 23 with a ligature." 24 He is relocated apparently to an "Own room" and was 25 "Passively resistant".</p> <p style="text-align: center;">Page 135</p>
<p>1 name of the individual concerned, the detained man, 2 "Male", "Unplanned". If we go to the bottom half, 3 please, "Staff involved" and the only name there is 4 DCM Steve Loughton, and he was Oscar 1. It takes place. 5 The location is "Own room". To the next page, please. 6 "Events leading up to the incident" and "The 7 circumstances why force was used". Only the right-hand 8 side appears relevant: 9 "Preventing injury to oneself. 10 "Preventing self-harm." 11 "Type of force used" in the centre: 12 "Verbal reasoning used to de-escalate the situation 13 initially and/or during the incident? No." 14 And then the bottom half of the document, please: 15 "Were C&R techniques used? 16 "Guiding hold." 17 What's a guiding hold? 18 A. It's a sort of a very minimal level of force. 19 Q. Was a guiding hold used during the first part of 20 the incident, when he was trying to strangle himself 21 with a ligature? 22 A. He was trying to pull the arm away -- he was trying to 23 prevent him from self-harming, but, I mean -- 24 Q. Would you call that a guiding hold? 25 A. I wouldn't say it's any of these things on this list.</p> <p style="text-align: center;">Page 134</p>	<p>1 On the next page: 2 "Injuries sustained & healthcare involvement. 3 "Was a member of healthcare present throughout the 4 incident ... 5 "No." 6 Then we have part of the document apparently 7 completed by Jo Buss, senior nurse: 8 "Did the detainee sustain any injuries at the time? 9 "Yes. 10 "... require outside hospitalisation ... 11 "No. 12 "Did a member of staff require medical attention at 13 the time? 14 "No." 15 Then there are formal parts of this first form on 16 page 5 with signatures, and I'm not going to go through 17 those. 18 Then there is an annex on page 7: 19 "Use of force." 20 It sets out the circumstances of it, whether 21 a training course -- the person involved had been on 22 a training course. Refresher in the last 12 months, 23 "Yes", and that relates to Steve Loughton. 24 Then on page 8, we find his report, which repeats 25 the C&R technique used for guiding hold:</p> <p style="text-align: center;">Page 136</p>

<p>1 "At approximately 19:08 I was checking the daily 2 food refusals and I was on Eden wing. I was just about 3 to deck a detainee by the name of ... who was currently 4 on a constant supervision and rule 40 and was residing 5 in room E/007 ..."</p> <p>6 That's cell 7 on wing E: 7 "... I was told by the officer who was watching him, 8 DCO Fraser, that he had just gone into the toilet area 9 and he couldn't see him properly, I entered the room and 10 called his name but had no answer, I then went into the 11 toilet area which is where I saw [him] curled up around 12 the toilet area with what looked like a ripped T-shirt 13 around his neck which he was holding onto. I attempted 14 to loose the ligature but [he] was holding onto it so 15 I asked DCO Fraser to pass me his fish knife and 16 I managed to cut the ligature off, I then pulled D1527 17 out of the toilet area and asked him to sit on the bed 18 which he did and I called for medical assistance on my 19 radio."</p> <p>20 Then, on page 9, there's another signature page, and 21 on page 10 we have a form 213, which is a report of 22 injury to the detainee. We can see it is dated and 23 timed in hand at 1900 hours on 25 April. And on 24 page 11, please, which is the last page: 25 "Seen on E wing room", I think it says, "by ... Jo",</p> <p style="text-align: center;">Page 137</p>	<p>1 apparently D1527, although there is no date for the 2 incident. But do you see the G4S log number 105/17? 3 That's the same number that we saw on the front sheet of 4 the use of force form that we were just looking at. 5 So it appears it's that incident to which it 6 relates. Were you aware of any body-worn camera footage 7 or anything of that nature?</p> <p>8 A. No, sir. 9 Q. Then under the heading "Does the incident meet the 10 following criteria?": 11 "Reasonable in the circumstances: Yes. 12 "No more force than is necessary: Yes. 13 "Was it necessary: Yes. 14 "Proportionate to the seriousness of the situation: 15 Yes." 16 Then under "The outcome of this review": 17 "Further investigation required: No. 18 "Letters of commendation required: No. 19 "Lessons learned and further training: No. 20 "No further action required: No." 21 Were you aware of forms like this?</p> <p>22 A. I wasn't, actually, sir, no. 23 Q. No. Did you know Steve Webb? 24 A. As a manager at the centre, yes. 25 Q. But insofar as it deals with that first part of the use</p> <p style="text-align: center;">Page 139</p>
<p>1 "RGN Jo", perhaps: 2 "Detainee has placed a ligature around his neck 3 removed by staff. After that he went to toilet and 4 attempted to self-strangulate [something] and removed 5 from his neck. Slightly redness noted on his neck." 6 Then there's a body map and the medical staff name 7 appears to be M Malcolm. Does that mean anything to 8 you?</p> <p>9 A. No, sir. 10 Q. So that's the use of force form, and I just want to show 11 you one other document, please, for now. The following 12 tab for you, chair, at number 25. For us, please, 13 <CJS000902> at page 8. 14 What we have here is a use of force review meeting 15 form. We can see at the top half it's completed by 16 Steve Webb. 17 July 2017. So getting on for three 17 months after the event. He completes in literally 18 a tick-box exercise: 19 "Are all of the use of force reports present: Yes. 20 "Are the documents completed correctly and to an 21 acceptable standard: Yes. 22 "Is the F213 Medical Form present: Yes. 23 "Is there CCTV/body-worn camera/camcorder evidence 24 which covers this incident: Yes." 25 Now, this all relates to the incident relating to</p> <p style="text-align: center;">Page 138</p>	<p>1 of force to which you were party/privy, is it a fair 2 summary, even though it's a tick-box exercise, as far as 3 you're concerned?</p> <p>4 A. I felt that -- I felt that the force used by 5 Steve Loughton on the detainee was necessary, given he 6 was trying to self-harm, and it appeared proportionate. 7 Of course the language that followed wasn't necessary, 8 but that's not covered by the tick box. 9 Q. No. But it only deals with the first part of 10 the incident. 11 A. Of course. 12 Q. It doesn't deal with -- there is no mention of 13 the battery in Mr Loughton's report? 14 A. No, sir. 15 Q. There's no mention, certainly not of what happened 16 afterwards -- 17 A. No, sir. 18 Q. -- in Mr Loughton's report. 19 Coming then, finally, to just a couple of other bits 20 and bobs, if I may, about followups and other things 21 that were said. If we go, please -- chair, can we put 22 up on screen, please, the following transcript 23 <TRN0000077> at page 45. This is a conversation much 24 later, on 9 May, that you had. It is a conversation 25 with Yan Paschali and Derek Murphy. Do you see about</p> <p style="text-align: center;">Page 140</p>

<p>1 a third -- two-thirds of the way down, Yan Paschali</p> <p>2 saying:</p> <p>3 "We don't cringe at breaking bones."</p> <p>4 A. Yes, sir.</p> <p>5 Q. "If I killed ... I wouldn't be bothered. I'd carry on.</p> <p>6 A lot of people are freaked out when you ... not you but</p> <p>7 ... but like proper bit scared."</p> <p>8 What was he talking about there? Was he talking</p> <p>9 about this incident or another incident?</p> <p>10 A. I think he was talking about people like me, as in me,</p> <p>11 Callum Tulley, you know, they get kind of, you know,</p> <p>12 freaked out and thrown off by --</p> <p>13 Q. Well, I can help you, because if we look a little</p> <p>14 further up the page, about halfway, do you see, three</p> <p>15 lines up on this expansion:</p> <p>16 "I didn't cry. I was tired, Yan. I was fucking</p> <p>17 knackered. You didn't see me having to try and pull him</p> <p>18 out of the toilet ..."</p> <p>19 So that seems to be the reference point, the</p> <p>20 context, in which he says that.</p> <p>21 A. Yes, sir.</p> <p>22 Q. So when he said things to you like, you know, "I don't</p> <p>23 cringe at breaking bones", was this Yan being Yan, just</p> <p>24 pure bravado, or did you think there was something to</p> <p>25 it?</p> <p style="text-align: center;">Page 141</p>	<p>1 ordered ... [to] do it, so I did it all properly ...</p> <p>2 locked [then a few things are missed] fucking way with</p> <p>3 me ... he went 'What you doing?' and I went 'I'm</p> <p>4 restraining you' ... cellmate punch me in the side of</p> <p>5 the head, that's what sparked me and I was like fuck</p> <p>6 this. Half of them in prison, they know how to get out</p> <p>7 of the locks."</p> <p>8 You say at 685:</p> <p>9 "... sounds like you got corrupted ...</p> <p>10 "Who? Me?"</p> <p>11 You say:</p> <p>12 "By, by what prison is.</p> <p>13 "Fucking in my [heyday], me and Tony mate ... the</p> <p>14 shit we done, but the people we were doing it to were</p> <p>15 not nice people. Like monsters who would scare</p> <p>16 everybody me included ... we did ourselves before the</p> <p>17 three of us, we have come off worse a few times as well,</p> <p>18 but what you gonna do."</p> <p>19 He says:</p> <p>20 "What if I told you could be sitting in the office</p> <p>21 now talking ... with a prisoner and he decides to tell</p> <p>22 you how much he enjoys raping babies and shit."</p> <p>23 And he talks more about, you know, his life in</p> <p>24 prison and his experience in prison because Yan Paschali</p> <p>25 had been a prison officer; is that right?</p> <p style="text-align: center;">Page 143</p>
<p>1 A. I thought there was something to it, sir.</p> <p>2 Q. Do you remember we looked a little earlier -- perhaps</p> <p>3 I don't have to show you it again. If you need me to,</p> <p>4 I can. On 4 May, when D1527 had been on the netting, do</p> <p>5 you remember you said to Clayton Fraser, "What do you</p> <p>6 do --</p> <p>7 A. "What's the best way to deal with" -- yes.</p> <p>8 Q. -- about somebody like him?", and what did he say?</p> <p>9 A. "What Yan did".</p> <p>10 Q. "What Yan did". That's 4 May. This is 9 May that we</p> <p>11 have up on screen. Did people admire, do you think,</p> <p>12 what Yan had done on 25 April? Was it something to be</p> <p>13 respected rather than criticised?</p> <p>14 A. Yes, sir.</p> <p>15 Q. Then another transcript, please, and I'm nearly done,</p> <p>16 but not quite. <TRN0000089> at page 19. This is</p> <p>17 6 June. Page 19, please. I'm not going to go through</p> <p>18 all of it, because there is quite a bit to it. This is</p> <p>19 Yan Paschali talking to you on that date about his time</p> <p>20 in prison. If we can focus on the top half for now, at</p> <p>21 line 670 we have got him saying:</p> <p>22 "... restraining people ... having to beat the shit</p> <p>23 out of them. And really you do cross the line, you have</p> <p>24 to do things that don't sit right with you maybe</p> <p>25 morally. I remember when I first joined ... I was</p> <p style="text-align: center;">Page 142</p>	<p>1 A. At HMP Wandsworth, yes, sir, yes.</p> <p>2 Q. At Wandsworth. Then just to complete this part of your</p> <p>3 evidence, and with the chair's agreement, we will rise</p> <p>4 for the day. Just one final transcript, please,</p> <p>5 <TRN0000038>. This, I think, is a video diary of yours,</p> <p>6 Mr Tulley, 596 of KENCOV3012. So that's on 25 April,</p> <p>7 this diary.</p> <p>8 If we go to page 5 and if we can expand it, please.</p> <p>9 Chair, it's B/21 for you.</p> <p>10 THE CHAIR: Thank you.</p> <p>11 MR ALTMAN: Here you say something you already said to us,</p> <p>12 but you said it on the day, as well as saying it later</p> <p>13 in the course of making your statement to the police.</p> <p>14 It's really just after halfway down:</p> <p>15 "And at that point I became so concerned for the</p> <p>16 detainee's safety, I actually thought Yan was going to</p> <p>17 kill him."</p> <p>18 Do you see that?</p> <p>19 A. Yes, sir.</p> <p>20 Q. So you said it on the same day to the BBC that that was</p> <p>21 in your mind?</p> <p>22 A. Yes, sir.</p> <p>23 Q. And you repeated it to the police in November 2017. At</p> <p>24 page 7, you say:</p> <p>25 "And then I went to the toilet [which we saw] ...</p> <p style="text-align: center;">Page 144</p>

1 started crying and sorted out my microphone.
 2 "And then I witnessed that and, yeah, left, went
 3 straight back to the wing and sat in the office with
 4 Yan. And you can't see him say it but you can hear him
 5 saying what he was trying to do to the detainee. And
 6 then later on, soon after, I was back on the constant
 7 supervision that I was originally on after all of that.
 8 And Yan was again saying to me what he did to the ...
 9 how he felt about the detainee and what he had
 10 previously done in his former job at Wandsworth
 11 [Prison]."
 12 If we go to the top of page 8, please, right at the
 13 top:
 14 "He said at Wandsworth they used to do things like
 15 smash detainees' faces onto sinks and cut them with
 16 razorblades so they could say they had self-harmed and
 17 so much stuff that was said that I can't even gather it
 18 all up in my mind. I just feel so overwhelmed by the
 19 whole thing."
 20 Again, Mr Tulley, was this just Paschali, as it
 21 were, being the alpha male at Brook House, or was this
 22 something people believed or were prepared to believe?
 23 **A. I certainly believed him, sir.**
 24 Q. So you didn't think this was just bragging; this was
 25 Yan Paschali?

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1 **A. Yes, sir, and his behaviour on the day suggested he was**
 2 **capable of such actions.**
 3 MR ALTMAN: That's the end of the 25 April incident which
 4 I wish to ask you about. We may have to play the
 5 unpixelated version, but not necessarily with you. But
 6 we will ask you back for tomorrow, please, and hopefully
 7 we will complete your evidence at a reasonable time
 8 tomorrow.
 9 Chair, with your permission, 10.00 am, please.
 10 THE CHAIR: Thank you. Mr Tulley, just to say, I know it's
 11 been a long and not particularly easy day, so thank you.
 12 We will see you again tomorrow.
 13 **A. Thank you, chair.**
 14 **(4.25 pm)**
 15 **(The hearing was adjourned to**
 16 **Thursday, 2 December 2021 at 10.00 am)**
 17
 18 I N D E X
 19
 20 MR CALLUM MICHAEL TULLEY (continued)1
 21
 22 Examination by MR ALTMAN (continued)1
 23
 24
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37 (Pages 145 to 146)

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