

<p>1 Friday, 3 December 2021</p> <p>2 (9.30 am)</p> <p>3 THE CHAIR: Thank you. Good morning.</p> <p>4 MR ALTMAN: Chair, the next witness is in the witness box,</p> <p>5 D1618. He will either be sworn or affirmed, as the case</p> <p>6 may be.</p> <p>7 WITNESS D1618 (sworn)</p> <p>8 THE CHAIR: Perhaps I could just start by saying I'm sure</p> <p>9 you will appreciate why I'm obviously not going to be</p> <p>10 addressing you by your name, so I will just refer to you</p> <p>11 as "sir", and my apologies if that feels very</p> <p>12 impersonal, but I'm sure you understand the reasons why.</p> <p>13 A. Thank you.</p> <p>14 Examination by MR ALTMAN</p> <p>15 MR ALTMAN: Thank you. For the purposes of this inquiry,</p> <p>16 you are known as D1618, which is a cipher. Can you</p> <p>17 confirm, please, that you have provided a statement to</p> <p>18 this inquiry dated 3 November 2021?</p> <p>19 A. Yes, sir.</p> <p>20 Q. Chair, that's <INQ000055>. I'm not going to ask for it</p> <p>21 to go up on screen, but I'm going to invite you, chair,</p> <p>22 to adduce that in its totality.</p> <p>23 THE CHAIR: Absolutely, thank you. Agreed.</p> <p>24 MR ALTMAN: As far as you're concerned, which is your</p> <p>25 country of origin, where do you come from?</p> <p>Page 1</p>	<p>1 Brook House?</p> <p>2 A. Yes, sir.</p> <p>3 Q. I think you say you were there until 16 November --</p> <p>4 A. That's right.</p> <p>5 Q. -- of 2017. What happened on 16 November?</p> <p>6 A. On 16 November, I was in -- I went to file a reporting</p> <p>7 and Home Office --</p> <p>8 Q. No, let me ask you this way. Were you released on bail</p> <p>9 on 16 November?</p> <p>10 A. Yes, sir.</p> <p>11 Q. So you were released from Brook House?</p> <p>12 A. Yes.</p> <p>13 Q. You were allowed to go?</p> <p>14 A. Yes.</p> <p>15 Q. This period of six months or so, was that the first time</p> <p>16 you had been in a detention centre?</p> <p>17 A. Yes, sir.</p> <p>18 Q. Can I ask you a little about some history?</p> <p>19 A. Yes, sir.</p> <p>20 Q. Were you granted refugee status --</p> <p>21 A. Yes, sir.</p> <p>22 Q. -- in July 2020, following a successful asylum appeal?</p> <p>23 A. Yes, sir.</p> <p>24 Q. Is that right?</p> <p>25 A. Yes, sir.</p> <p>Page 3</p>
<p>1 A. Afghanistan.</p> <p>2 Q. And how old are you now?</p> <p>3 A. I'm 24.</p> <p>4 Q. You were detained at Brook House Centre. I think in</p> <p>5 your witness statement you say 16 April 2017. Was it</p> <p>6 16 May, rather than April? Do you remember now?</p> <p>7 A. I can't remember, was on the 16th.</p> <p>8 Q. Let's just have a look at a document. I think it's</p> <p>9 easier if we put it up on screen, rather than my asking</p> <p>10 you to go to that bundle which you have. Chair, for you</p> <p>11 it is flag 13. Can we put up on screen, please,</p> <p>12 <HOM0332009> at page 1. If we just expand the top half,</p> <p>13 I hope you will have seen this before. These are</p> <p>14 medical records from Brook House. We have your number,</p> <p>15 your cipher, at the top of the page. It relates to your</p> <p>16 detention at Brook House. Do you see there is a date,</p> <p>17 "16 May 2017"?</p> <p>18 A. Yes, sir.</p> <p>19 Q. Do you see there is a second date, "16 May 2017", where</p> <p>20 it says "History: new admission from Lunar House"?</p> <p>21 A. Yes, sir.</p> <p>22 Q. It may suggest, rather than 16 April, which you thought</p> <p>23 originally was the date of your original detention, it</p> <p>24 is more likely to be 16 May. It may not matter very</p> <p>25 much. You were there for about six or seven months at</p> <p>Page 2</p>	<p>1 Q. Were you diagnosed, while you were at Brook House, with</p> <p>2 post-traumatic stress disorder?</p> <p>3 A. Yes, sir.</p> <p>4 Q. Was that as a result of events in Afghanistan?</p> <p>5 A. Yes, sir.</p> <p>6 Q. What sort of problems did post-traumatic stress disorder</p> <p>7 cause you? What problems did you have as a result of</p> <p>8 having that disorder?</p> <p>9 A. Stress and nightmares.</p> <p>10 Q. Stress, nightmares?</p> <p>11 A. And headaches.</p> <p>12 Q. How did it affect your memory?</p> <p>13 A. This affect me because I was in there and, without any</p> <p>14 reason, I was detained, I kept thinking.</p> <p>15 Q. How did it affect your -- did it affect your memory? Do</p> <p>16 you understand my question?</p> <p>17 A. Yes.</p> <p>18 Q. Having post-traumatic stress disorder, did you have any</p> <p>19 memory issues as well?</p> <p>20 A. Yes.</p> <p>21 Q. During your time at Brook House, did your mental health</p> <p>22 become worse?</p> <p>23 A. Worse and worse.</p> <p>24 Q. You say you suffer from nightmares and headaches, and so</p> <p>25 on.</p> <p>Page 4</p>

<p>1 Now, let's keep these medical records open, please, 2 because I want to ask you some questions about them to 3 begin with. There is a lot of information there, and 4 perhaps I can summarise the information you gave when 5 you arrived at Brook House. We may have to expand it 6 a bit more, please, if we can sort of halve the page, 7 because it's very difficult to read.</p> <p>8 When you arrived at Brook House -- this is what's 9 known as the history. This is the account that you gave 10 which the healthcare assistant took from you when you 11 arrived late on 16 May, by the look of it, that's the 12 date. In the second line -- can you read it with me: 13 "Current medication [he's not on any current 14 medication]... no past or present thoughts of self-harm 15 or suicide, states never been tortured ... 16 "... appears calm and content ... 17 "No suicidal thoughts ..."</p> <p>18 What it is, is, I imagine, the nurse goes through 19 a list of things and asks you "yes or no", "yes or no" 20 questions and answers. 21 Halfway down, do you see: 22 "Speaks English well ..." 23 Have you got that?: 24 "Born in Afghanistan ... 25 "Health related observations about the prisoner's</p> <p style="text-align: center;">Page 5</p>	<p>1 post-traumatic stress disorder, did you have that before 2 you arrived at Brook House, or are you saying it only 3 arose once you were in Brook House? 4 A. No, I had before, but it's -- 5 Q. Before? 6 A. Yes. 7 Q. Why did you not tell the healthcare assistant about your 8 PTSD when you arrived at Brook House? Can you remember 9 now why you didn't say anything about it, as far as the 10 record shows? 11 A. I was very emotional and very down. I didn't say to 12 them. 13 Q. If we go back to the first page as well, just at the 14 second entry, "History": 15 "New admission from Lunar House, maintained good eye 16 contact, speaks English well ... not on any current 17 medication ... no past or present thoughts of self-harm 18 or suicide, states never been tortured ..." 19 So that we understand, had you been tortured in 20 Afghanistan, or not? 21 A. I haven't been tortured. 22 Q. You hadn't. So that was a true thing that you said. In 23 other words, when you said "never had been tortured", 24 that was true, because you hadn't been; are you sure? 25 A. That's correct.</p> <p style="text-align: center;">Page 7</p>
<p>1 physical appearance ... -- appears healthy. 2 "Fit for normal location, work and any cell 3 occupancy ..."</p> <p>4 In other words, which cell you could go into: 5 "Impressions of the prisoner's behaviour and mental 6 state ... -- appears calm and content." 7 Do stop me if you haven't understood anything I'm 8 asking you: 9 "Prisoner has not tried to harm themselves ..."</p> <p>10 So do you see that that was the history that was 11 being taken from you by that healthcare assistant, and 12 it goes on over the page. If we can expand the top half 13 again, please. It talks about: 14 "Prisoner assessment for in-possession medication 15 completed ... 16 "Self medication assessment -- low risk ..."</p> <p>17 So it goes through, as I say, a list of issues which 18 clearly you were asked about. So what I want to ask you 19 is this, perhaps, just going through that list and 20 hopefully in not any more detail, when you arrived, you 21 seemed to be okay, and when you arrived you didn't 22 appear to say that you had any mental health issues. Is 23 that correct? Do you agree with that? 24 A. Yes. 25 Q. So that we understand your position, your PTSD, your</p> <p style="text-align: center;">Page 6</p>	<p>1 Q. If we look, please, at another document, if we can, 2 <DL0000075>, if we can put that up on screen, please -- 3 chair, it's tab 4. This is a psychiatric report that 4 was prepared on your behalf on 10 November 2017. 5 10 November 2017 is just a few days before you were 6 released on bail from Brook House; yes? 7 A. Yes. 8 Q. If we look at page 18 -- is that page 18? I think 9 I probably meant page 14. Let me have a look. I've got 10 it paginated slightly differently. Can you go back to 11 page 14? Yes, that's the one. Can we look at the top, 12 question -- we are going to have to expand it because it 13 is illegible. Have you seen the psychiatric report 14 before? 15 A. Yes, sir. 16 Q. I assume you have. This is a psychiatrist, Dr Bose, who 17 was being asked questions by your solicitors on behalf 18 of you. One of the questions at paragraph 36 is: 19 "What recommendations would you make for any 20 treatment, counselling or medication in the light of any 21 conditions he suffers from?" 22 And you can see that the psychiatrist there is 23 talking about your PTSD, post-traumatic stress disorder, 24 and the therapies which are available. If we can go 25 down, please, to question 37, in the bottom half of</p> <p style="text-align: center;">Page 8</p>

<p>1 the page:</p> <p>2 "If you believe the client ..."</p> <p>3 You're the client:</p> <p>4 "... suffers from a mental health condition, what</p> <p>5 would you believe to be the main causation factors?"</p> <p>6 In other words, what caused it:</p> <p>7 "For example:</p> <p>8 "Please indicate what impact the events in</p> <p>9 Afghanistan have had on his mental health."</p> <p>10 The psychiatrist has there written:</p> <p>11 "From the account that D1618 gave me, he said he was</p> <p>12 very happy in Afghanistan and was living very</p> <p>13 comfortably in Afghanistan until the kidnapping attempt</p> <p>14 occurred a week before he left the country to make his</p> <p>15 way over across Europe."</p> <p>16 Were you subject to a kidnapping attempt in</p> <p>17 Afghanistan before you left the country? Is that what</p> <p>18 you were saying?</p> <p>19 A. Yes, sir.</p> <p>20 Q. "The kidnapping was a complete turning point ... After</p> <p>21 this had occurred, he became absolutely certain in his</p> <p>22 mind that he was going to die if he stayed in</p> <p>23 Afghanistan. He said that everybody else around him who</p> <p>24 cared about his welfare were in agreement with him. His</p> <p>25 mother did not allow him to go out of the house after</p> <p style="text-align: center;">Page 9</p>	<p>1 So you'd had this issue, this kidnapping issue, in</p> <p>2 Afghanistan. You have come to this country. What the</p> <p>3 psychiatrist says is that, when you first arrived at the</p> <p>4 immigration removal centre six months before, you had</p> <p>5 intrusive thoughts about the kidnapping occasionally,</p> <p>6 once or twice a week. Is that correct?</p> <p>7 A. That's right.</p> <p>8 Q. Let's move on. Let me ask you about the environment at</p> <p>9 Brook House. Chair, the witness deals with this on</p> <p>10 pages 2 to 5 of his witness statement, paragraphs 8</p> <p>11 through to 24. What did you think of Brook House when</p> <p>12 you arrived? Was it clean or was it dirty?</p> <p>13 A. It was okay, but -- the corridor was clean, but inside</p> <p>14 the room was dirty.</p> <p>15 Q. Did you share a room with somebody else?</p> <p>16 A. I was shared with two boys, Afghan boys.</p> <p>17 Q. Two, but Afghanistani?</p> <p>18 A. Yes.</p> <p>19 Q. Did you find it a safe place or an unsafe place to live?</p> <p>20 A. Unsafe, because I haven't been in this situation before.</p> <p>21 Q. How was it unsafe? We understand when you say you'd not</p> <p>22 been in that situation. What was it that made it</p> <p>23 unsafe?</p> <p>24 A. Because inside your -- there was two men and you're not</p> <p>25 allowed to, like, free yourself, to go toilet and stuff</p> <p style="text-align: center;">Page 11</p>
<p>1 the event, because she was so worried about his safety."</p> <p>2 The psychiatrist is repeating the history that you</p> <p>3 gave. On the next page, the psychiatrist records</p> <p>4 information about your journey to this country, and then</p> <p>5 the refusal of your asylum claim and "being Appeal</p> <p>6 rights accused", which is the way it's expressed.</p> <p>7 Then at paragraph 38 at the bottom:</p> <p>8 "Please describe the impact of the first incident of</p> <p>9 attempted removal had on our client's psychiatric</p> <p>10 condition, please comment both on the effect ...</p> <p>11 "The incident itself had on our client, ie, the</p> <p>12 verbal and physical abuse during the removal?"</p> <p>13 This comes to another aspect that I will ask you</p> <p>14 about in a minute.</p> <p>15 First of all, before I go on ...</p> <p>16 MS MORRIS: Chair, I wonder if it would be possible for you</p> <p>17 to rise for five minutes while I have a conversation</p> <p>18 with your counsel?</p> <p>19 THE CHAIR: Agreed.</p> <p>20 MS MORRIS: Thank you.</p> <p>21 (9.52 am)</p> <p>22 (A short break)</p> <p>23 (9.57 am)</p> <p>24 MR ALTMAN: Thank you, chair. Can we put up page 18 of that</p> <p>25 document. The first two lines, really, at the top.</p> <p style="text-align: center;">Page 10</p>	<p>1 and smell was in the room as well.</p> <p>2 Q. What did you just say? Smell?</p> <p>3 A. Room was smell, yes.</p> <p>4 Q. I'm asking you not about the conditions, because what</p> <p>5 you are saying is, you shared a room with two other men,</p> <p>6 you had no privacy and there were smells. We understand</p> <p>7 that. But I'm asking you something different. Do you</p> <p>8 understand what I mean when I ask you if you felt safe?</p> <p>9 Do you understand what I mean by "safe"? Let me put it</p> <p>10 another way.</p> <p>11 Did you see violence? Do you understand the word</p> <p>12 "violence"?</p> <p>13 A. Yes, there was violence.</p> <p>14 Q. Did that make you feel happy or unhappy?</p> <p>15 A. Unhappy.</p> <p>16 Q. Because?</p> <p>17 A. Because ... I'm sorry.</p> <p>18 Q. You had not been in that kind of situation before, and</p> <p>19 you were locked up and you were sharing a room with two</p> <p>20 other men. Did you see fighting take place?</p> <p>21 A. Yes, with my eyes.</p> <p>22 Q. Was there drugs?</p> <p>23 A. There was drugs as well.</p> <p>24 Q. You say that you spent two nights when you first arrived</p> <p>25 on the induction wing. Is that correct?</p> <p style="text-align: center;">Page 12</p>

1 **A. Yes, sir.**
 2 Q. B wing?
 3 **A. I arrived first I think it was E wing.**
 4 Q. You think E wing you went on?
 5 **A. Yes.**
 6 Q. When you were detained, which wing were you on for most
 7 of the time?
 8 **A. Most of the time, I was in D wing.**
 9 Q. D?
 10 **A. Yes, sir.**
 11 Q. You were on E wing for a short amount of time. We will
 12 come to why you were on E wing for a short amount of
 13 time.
 14 (Fire alarm test)
 15 MR ALTMAN: Moving on, you have told us that the room you
 16 didn't like, you didn't like sharing with two men. Is
 17 that what we understand?
 18 **A. Yes, sir.**
 19 Q. You say in your statement -- you have told us about the
 20 smells. Were there cleaning products available? Could
 21 you clean the room? Was it easy to find cleaning items?
 22 **A. No.**
 23 Q. You say that the toilet was cracked and leaking. Is
 24 that right? You had to use a blanket to stop the leak,
 25 is what you remembered?

Page 13

1 **A. Yes, sir.**
 2 Q. You remember at your paragraph 16 -- don't look at the
 3 statement unless you need to. I think it's easier just
 4 to listen to me. If you need to look at the statement,
 5 you can, but it will probably be easier if you don't.
 6 You say that you had one blanket each. Is that right?
 7 So, as you remember it, there was not much bedding. Do
 8 you understand what I mean, for the bed?
 9 **A. Yes, sir.**
 10 Q. Were you locked in at night?
 11 **A. Yes, sir.**
 12 Q. Between 9.00 in the evening and 8.00 o'clock in the
 13 morning?
 14 **A. Yes, sir.**
 15 Q. You were locked in during the day, do you remember? Was
 16 that for meal times?
 17 **A. For the meal time.**
 18 Q. When you were locked in at night, did you find that
 19 difficult?
 20 **A. Yes, sir.**
 21 Q. Because? Why was it difficult when you were locked in
 22 at night?
 23 **A. Because my friend wants going to the toilet, and they**
 24 **can't.**
 25 Q. We will come to an injury that you had, in a short

Page 14

1 while, as a result of an attempted removal, but did you
 2 suffer from pain at night when you were locked in?
 3 **A. Yes, sir.**
 4 Q. Now let me ask you about something else. I asked you
 5 a little earlier whether the place was unsafe. Let me
 6 ask you that a different way. Chair, I'm looking at
 7 paragraph 25 and onwards. Were there many people at
 8 Brook House who had been to prison for criminal matters?
 9 **A. Yes, sir.**
 10 Q. Did some of them act as if they were in gangs?
 11 **A. Yes, sir.**
 12 Q. Did that frighten you?
 13 **A. Yes, sir.**
 14 Q. Were there fights?
 15 **A. Yes, sir.**
 16 Q. And arguments between people?
 17 **A. Yes, sir.**
 18 Q. Did you ever see a fight?
 19 **A. Yes, sir.**
 20 Q. The officers, did they do anything about that fight?
 21 **A. No, sir.**
 22 Q. How were the members of staff towards you -- chair,
 23 paragraph 33. How were the members of staff towards
 24 you? Were they nice to you?
 25 **A. Some of them.**

Page 15

1 Q. Yes?
 2 **A. Most of them wasn't.**
 3 Q. The ones who weren't, how did they behave towards you?
 4 What did they do or say? What were the things you
 5 didn't like?
 6 **A. They would keep ignoring you. Ignoring you.**
 7 Q. Ignoring you. When you say they kept ignoring you, was
 8 that, if you asked them to do something, they ignored
 9 you, or they just didn't help you?
 10 **A. They just didn't help you.**
 11 Q. Did you complain to anyone about them --
 12 **A. Yes, sir.**
 13 Q. -- when you were in Brook House?
 14 **A. Yes, sir.**
 15 Q. Who did you complain to?
 16 **A. You can't complain straight away. You have to write it**
 17 **down and put it in the complaint box.**
 18 Q. Did you do that?
 19 **A. I did, many times.**
 20 Q. Did you hear anything back from those complaints?
 21 **A. I haven't.**
 22 Q. When you say "many times", you were there for about six
 23 months. Give us an idea of what you mean by "many
 24 times" -- once a week, once a month? I'm not putting
 25 numbers in your head, but I want you to give us an idea,

Page 16

4 (Pages 13 to 16)

1 just an idea, of how many times you think you complained
 2 during the six months you were there?
 3 **A. I did more than 20 times.**
 4 Q. Are you telling us you never heard back from any of
 5 those complaints?
 6 **A. I never heard.**
 7 Q. What were the kind of complaints? Give us an idea of
 8 what you were complaining about?
 9 **A. I was complaining about the cleaning products, it's**
 10 **complaining about the security guards, it's complaining**
 11 **about some playing stuff things.**
 12 Q. About some ...?
 13 **A. Playing stuff. Like, you need something for playing**
 14 **football.**
 15 Q. So the sports facilities and activities?
 16 **A. And activities.**
 17 Q. So cleaning products, activities?
 18 **A. Security guards.**
 19 Q. Security guards. What about the security guards? What
 20 were you complaining about them? What were you saying?
 21 **A. Because I was saying to them they were not helping me**
 22 **and when I -- if I need anything, they were ignoring me.**
 23 Q. Any other kind of complaints you can remember now?
 24 **A. I did about the fighting, which is what I saw in my**
 25 **eyes, one of my friend fight and the security guard**

Page 17

1 **wasn't helping, just standing there.**
 2 Q. Was that the only time you saw that, a fight and the
 3 security guard did nothing, or did you see that more
 4 than once?
 5 **A. More than once.**
 6 Q. Did you think the security guards gave you respect? Do
 7 you understand the word "respect"?
 8 **A. Yes, sir.**
 9 Q. Did they give you respect?
 10 **A. No. No, sir.**
 11 Q. Did they use unkind words to you?
 12 **A. Yes, sir.**
 13 Q. What kind of words?
 14 **A. Abusing words.**
 15 Q. English words?
 16 **A. Yes, sir.**
 17 Q. Swearwords?
 18 **A. Swearwords.**
 19 Q. Such as?
 20 **A. I can't say, sir.**
 21 Q. You can't or you don't want to?
 22 **A. I don't want to.**
 23 Q. But bad words?
 24 **A. Bad words, sir.**
 25 Q. Now I'm going to ask you about 29 July 2017. I will

Page 18

1 remind you what happened on 29 July. It's paragraph 39,
 2 chair, of the witness statement. Do you remember, on
 3 29 July, you were going to be taken back to Afghanistan?
 4 Do you remember now?
 5 **A. Yes, sir.**
 6 Q. During the day time. In your statement, you believed
 7 that the staff had put you on E wing before going back
 8 to Afghanistan. You say in the statement that the
 9 guards who took you to the airport treated you like an
 10 animal. Do you remember saying that?
 11 **A. Yes, sir.**
 12 Q. That they put you in restraints. Do you understand the
 13 word "restraints"?
 14 **A. Yes, sir.**
 15 Q. How were you restrained? What did you have on you to
 16 take you to the airport? Do you remember?
 17 **A. I have, like, belt in my waist.**
 18 Q. So a waist belt restraint?
 19 **A. Yes, and my hands.**
 20 Q. What, handcuffs?
 21 **A. It wasn't a handcuff. It was, I think, connect with**
 22 **the ...**
 23 Q. Connected with the waist, I see.
 24 **A. Yes, sir.**
 25 Q. So your wrists were connected to the waist belt

Page 19

1 restraint?
 2 **A. Yes, sir.**
 3 Q. Did you think that you deserved to be treated like that?
 4 **A. No, sir.**
 5 Q. Had you been resisting going back to Afghanistan at that
 6 point? Had you been difficult in Brook House?
 7 **A. Yes, sir.**
 8 Q. I want you to understand what I'm saying. Had you put
 9 up a fight when you were at Brook House to stop going?
 10 **A. No, sir.**
 11 Q. When you were on the plane, what happened, as you
 12 remember it? When you were on the plane, what happened?
 13 You know that there are two sides to this story. The
 14 escort guards say that you were screaming and protesting
 15 and became physical on the plane so that they had to
 16 take you back to Brook House. What do you say happened?
 17 **A. They pulled me up and they're just twisting the**
 18 **handcuff, and because of that, I was screaming.**
 19 Q. Stop there. I thought you said you didn't have
 20 handcuffs but you had something connected to the waist
 21 belt restraint?
 22 **A. When I get to the plane, they put the handcuff as well**
 23 **on the top of that.**
 24 Q. Hands in front or hands behind?
 25 **A. It was in front.**

Page 20

5 (Pages 17 to 20)

1 Q. So, what, metal handcuffs or plastic ones?
 2 **A. They put metal ones.**
 3 Q. Metal ones. You were on the plane?
 4 **A. Yes, sir.**
 5 Q. In your seat; yes?
 6 **A. Yes, sir.**
 7 Q. Did you have a guard either side of you, or one guard?
 8 What was it?
 9 **A. I was in the middle, yes, and right hand and left hand**
 10 **was --**
 11 Q. So three seats, right hand, left hand --
 12 **A. -- security guards.**
 13 Q. -- guards either side?
 14 **A. Yes.**
 15 Q. Did you want to go back to Afghanistan?
 16 **A. No, sir.**
 17 Q. Were you protesting in any way?
 18 **A. No, sir.**
 19 Q. What were you doing? Do you understand the word --
 20 **A. I was just crying.**
 21 Q. Crying?
 22 **A. Yes, sir.**
 23 Q. What, tears crying?
 24 **A. Yes, sir.**
 25 Q. Were you making noise? Screaming, shouting?

Page 21

1 **A. I was just crying. Then they say, "You have to stop.**
 2 **Otherwise, we keep twisting your hand", and that's why**
 3 **I scream.**
 4 Q. You had handcuffs on both wrists?
 5 **A. Yes, sir.**
 6 Q. How did you get the injury on your right wrist?
 7 **A. On the right hand was keep the security guard twisting**
 8 **my hand.**
 9 Q. When you say "twisting", what, causing you pain?
 10 **A. Yes, sir.**
 11 Q. Why was he doing that? Do you know?
 12 **A. He tried to -- telling me to shush.**
 13 Q. To be quiet?
 14 **A. Yes, sir.**
 15 Q. Were there other people on the plane at the time?
 16 **A. Yes, sir.**
 17 Q. Passengers?
 18 **A. Passengers.**
 19 Q. Was it Turkish Airlines plane?
 20 **A. Yes, sir.**
 21 Q. Did blood come from your wrist?
 22 **A. Yes, sir.**
 23 Q. Because of what happened between you, were you taken off
 24 the plane? Were you removed from the plane?
 25 **A. I think the pilot came. Then they say, "I can't take**

Page 22

1 **this guy. I don't know he's a criminal or detainees".**
 2 Q. That's what the pilot said?
 3 **A. Yes, sir.**
 4 Q. Because of it, did the Tascor men take you off the
 5 plane?
 6 **A. The pilot said to "Take him off".**
 7 Q. So you were taken off the plane and taken back to
 8 Brook House?
 9 **A. Yes, sir.**
 10 Q. We know that you were taken to hospital in Crawley for
 11 an X-ray; yes?
 12 **A. Yes, sir.**
 13 Q. I think one of the security guards, whom you recognised
 14 as Derek Murphy, took you to the hospital for the X-ray.
 15 Do you remember?
 16 **A. Yes, sir.**
 17 Q. Was that on the same day that you got back from
 18 Brook House, or on another day?
 19 **A. The next day.**
 20 Q. The next day. So that would be 30 July?
 21 **A. Yes, sir.**
 22 Q. Did you ever see the results of the X-ray?
 23 **A. No, sir.**
 24 Q. Did anybody take photographs of your injuries?
 25 **A. Yes, sir.**

Page 23

1 Q. Who?
 2 **A. In hospital.**
 3 Q. The X-ray. Sorry, it's my question. At Brook House,
 4 did anybody, any of the guards, take photographs of your
 5 injuries?
 6 **A. No. One of my friends.**
 7 Q. One of your fellow detained men did, but not the guards?
 8 **A. Not the guards.**
 9 Q. We can see, if we put up on screen, please, a document
 10 that shows the fact that you were taken to hospital.
 11 Can we put up again, please, <HOM0332009> at page 11.
 12 Chair, it is flag 13, but you will see it on screen. It
 13 is a risk assessment form. Page 11. Can we expand
 14 this, please. It may be harder -- can you do a bit
 15 better than that as well, please? Thanks.
 16 You can see it has your number at the top,
 17 "Nationality: Afghanistan". You see:
 18 "Right wrist injury, not to be handcuffed on that
 19 wrist.
 20 "Crawley Hospital.
 21 "Walk-in X-ray."
 22 There is no date on it, but you say it was 30 July,
 23 the next day. What this document is, is a Brook House
 24 document to say that the man who took you to hospital
 25 shouldn't handcuff you because you had an injury on your

Page 24

6 (Pages 21 to 24)

<p>1 wrist. Now I want to show you another document. Chair,</p> <p>2 it's tab 5. <HOM0322101>, please. We are going to</p> <p>3 please expand it again.</p> <p>4 Now, the 29 July removal didn't happen, and you say</p> <p>5 why it didn't happen, and you were taken back to</p> <p>6 Brook House, where I think the documentation shows you</p> <p>7 might have been put on E wing when you came back. We</p> <p>8 don't have to look at the documentation, I think, but do</p> <p>9 you remember now possibly going on to E wing when you</p> <p>10 came back from Gatwick? Or you don't remember?</p> <p>11 A. I remember they put me back to the same D wing.</p> <p>12 Q. D?</p> <p>13 A. Yes, sir.</p> <p>14 Q. So you don't think you went back on E wing afterwards?</p> <p>15 A. No, sir.</p> <p>16 Q. If needs be, we can look at a document that perhaps</p> <p>17 suggests you did, but it may not matter much.</p> <p>18 This is another risk assessment, an airline risk</p> <p>19 assessment. This was to remove you. You can see the</p> <p>20 date on the right, 27 August, so almost a month</p> <p>21 afterwards, after the first attempt to remove you from</p> <p>22 the country. This was to be a flight from -- to</p> <p>23 Istanbul and then connecting on to Kabul. If we can go</p> <p>24 to the bottom half, please, section B, the key risk</p> <p>25 indicators, I just want you to look at number 2, because</p> <p style="text-align: center;">Page 25</p>	<p>1 says, perhaps a little inconsistently with number 2, is</p> <p>2 that you had, on a previous occasion, been disruptive or</p> <p>3 violent when you were on board an aircraft. Do you</p> <p>4 understand what this document is saying about you?</p> <p>5 A. Yes, sir.</p> <p>6 Q. That your removal on 29 July had to be cancelled because</p> <p>7 you were being physically violent and disruptive, in</p> <p>8 other words, you tried to stop yourself going. Now, do</p> <p>9 you accept that?</p> <p>10 A. No, sir.</p> <p>11 Q. The allegation -- that's perhaps a difficult English</p> <p>12 word. But the allegation that is made against you, so</p> <p>13 that you understand, because I want you to have an</p> <p>14 opportunity to answer it, of what happened on 29 July we</p> <p>15 can see in another document, and I want you to follow</p> <p>16 this with me, so another document, please, <HOM0322267></p> <p>17 at page 4. If we can expand the top two boxes, please,</p> <p>18 this is a document at the top, it calls itself "Detainee</p> <p>19 detention history". It is a Home Office document. It</p> <p>20 sets out what it is said you did on 29 July in order --</p> <p>21 that led to the cancellation of your removal. Do you</p> <p>22 see? It says:</p> <p>23 "Plane was delayed and landed at 16:40. Escorts</p> <p>24 boarded flight with subject ..."</p> <p>25 You're the "subject":</p> <p style="text-align: center;">Page 27</p>
<p>1 this is an assessment for the airline about the risk to</p> <p>2 them of removing you on an aeroplane. Do you see</p> <p>3 number 2:</p> <p>4 "Is the subject known to have exhibited disruptive</p> <p>5 or violent behaviour?"</p> <p>6 Do you understand those words? What it is actually</p> <p>7 saying is -- it is a question for them to understand</p> <p>8 what risk you present to them, it's whether you are</p> <p>9 violent or whether you made difficulty when you were</p> <p>10 removed on the last occasion, and do you see the box on</p> <p>11 the right says "No"?</p> <p>12 Do you think you were violent on the occasion you</p> <p>13 were removed on 29 July? Do you understand the</p> <p>14 question?</p> <p>15 A. Yes, sir.</p> <p>16 Q. Had you been violent?</p> <p>17 A. No, sir.</p> <p>18 Q. The risk indicator says "No" in relation to 27 August.</p> <p>19 But then at number 3:</p> <p>20 "Has the subject previously ..."</p> <p>21 "Previously" means before:</p> <p>22 "... engaged in disruptive or violent behaviour on</p> <p>23 board an aircraft that has led to their removal being</p> <p>24 cancelled?"</p> <p>25 And the answer given is "Yes". So what number 3</p> <p style="text-align: center;">Page 26</p>	<p>1 "... in WRB ['waist restraint belt' is what that</p> <p>2 stands for] and cuffs [as in handcuffs] at 17:20. For</p> <p>3 the next hour whilst the plane was getting ready to push</p> <p>4 back ..."</p> <p>5 "Push back" means when a plane is pushed back from</p> <p>6 the terminal building:</p> <p>7 "... the subject [that's you] started screaming,</p> <p>8 became verbally abusive and physically violent whilst</p> <p>9 still in restraints."</p> <p>10 Do you understand those words?</p> <p>11 A. Yes, sir.</p> <p>12 Q. "Sufficient force was used whilst trying to restrain and</p> <p>13 calm even though subject attempted to headbutt the</p> <p>14 escorts."</p> <p>15 Do you know what a headbutt is?</p> <p>16 A. No, sir.</p> <p>17 Q. Using your head to hit someone with your forehead.</p> <p>18 That's what a headbutt is. Striking somebody with the</p> <p>19 head:</p> <p>20 "The station manager eventually decided to refuse</p> <p>21 the escorts to fly with the subject."</p> <p>22 So what's being said here is the station manager</p> <p>23 didn't allow the escorts to fly with you because you</p> <p>24 were violent, is what's being said. Have you understood</p> <p>25 what I have just read to you?</p> <p style="text-align: center;">Page 28</p>

<p>1 A. Yes, sir.</p> <p>2 Q. Have you understood what the allegation is about you and</p> <p>3 your behaviour on the flight on 29 July? Have you</p> <p>4 understood that?</p> <p>5 A. Yes, sir.</p> <p>6 Q. Is it true or false?</p> <p>7 A. It's false, sir.</p> <p>8 Q. The one thing that is not here is the fact that you had</p> <p>9 an injury to your wrist. Do you see? There is no</p> <p>10 mention of a wrist injury. Yes?</p> <p>11 A. Yes, sir.</p> <p>12 Q. Was it obvious to the escorts that you had suffered an</p> <p>13 injury as a result of what happened on the plane? Do</p> <p>14 you understand what I'm asking you? Could they see that</p> <p>15 you had an injury when you were on the plane with them?</p> <p>16 A. Yes, sir.</p> <p>17 Q. Let's just see what happened when you were taken back.</p> <p>18 I said perhaps we didn't have to put up a document, but</p> <p>19 let's see if this helps. <CJS001309>, please, at</p> <p>20 page 5. Chair, tab 1. Right at the bottom of page 5,</p> <p>21 please. The first incident took place on 29 July when</p> <p>22 you were taken off the plane. You say you were taken</p> <p>23 back to Brook House. The next day, the 30th, as you</p> <p>24 recall it, that's when you went to hospital for an</p> <p>25 X-ray; yes?</p> <p style="text-align: right;">Page 29</p>	<p>1 A. Yes, sir.</p> <p>2 Q. We know the history. X-ray, didn't get the results, no</p> <p>3 photographs taken, but a fellow detained man took</p> <p>4 photographs of your injuries. Is that right?</p> <p>5 A. Yes, sir.</p> <p>6 Q. You have those photographs, I think, don't you? Do you</p> <p>7 still have those photographs?</p> <p>8 A. At the moment, no, sir.</p> <p>9 Q. You don't know or you don't?</p> <p>10 A. I don't have at the moment.</p> <p>11 Q. You don't have them, all right. Did it affect your</p> <p>12 sleep, the injury?</p> <p>13 A. Yes, sir.</p> <p>14 Q. How did it make you feel mentally?</p> <p>15 A. Worse.</p> <p>16 Q. Can we have a look at your medical records. Let's go</p> <p>17 back to them. Tab 13, chair. Let's go to the second</p> <p>18 page, please, <HOM0332009>, page 2. If we go right to</p> <p>19 the bottom third, please, we are looking at the date</p> <p>20 29 July.</p> <p>21 Now, do you see you were seen at a quarter past</p> <p>22 10.00 at night on the 29th by a nurse called Carol Reed.</p> <p>23 Can you see that box?</p> <p>24 A. Yes, sir.</p> <p>25 Q. The history is:</p> <p style="text-align: right;">Page 31</p>
<p>1 A. Yes, sir.</p> <p>2 Q. Do you see the date on this document, 30 July? At top,</p> <p>3 it says "Eden wing detainees". We see your number,</p> <p>4 D1618. It rather suggests that on the 30th, having been</p> <p>5 escorted back from your removal directions -- it rather</p> <p>6 suggests that, on 30 July, you were moved to room 2 at</p> <p>7 E wing. Do you see why I say that?</p> <p>8 A. Yes, sir.</p> <p>9 Q. Do you remember that now or do you still not remember?</p> <p>10 A. I just remember I been in D wing on that night.</p> <p>11 Q. As I said before, it may not matter overmuch, but this</p> <p>12 document tells us -- if it is accurate, this document</p> <p>13 tells us you were taken to E wing on your return to</p> <p>14 Brook House from the airport.</p> <p>15 Now let's think about how healthcare dealt with you,</p> <p>16 please, because you had an injury. Chair, this is dealt</p> <p>17 with at various places in the witness's statement, but</p> <p>18 let me take it as shortly as I can. Paragraph 23. One</p> <p>19 of the things you told us before, you suffered an injury</p> <p>20 to your arm. Do you remember saying in your witness</p> <p>21 statement that, after the attempted removal, you would</p> <p>22 be in pain at night, but you only had paracetamol to</p> <p>23 deal with the pain --</p> <p>24 A. Yes, sir.</p> <p>25 Q. -- which you said wasn't enough?</p> <p style="text-align: right;">Page 30</p>	<p>1 "Seen by nurse ...</p> <p>2 "Diagnosis ..."</p> <p>3 Do you understand the word "Diagnosis"?</p> <p>4 A. Yes, sir.</p> <p>5 Q. "Returned from a failed flight under restraint. Both</p> <p>6 wrist red and swollen. Right wrist two marks and slight</p> <p>7 bleeding. Right wrist is more swollen. Officers said</p> <p>8 that he didn't fall on hand, but some force was</p> <p>9 necessary. Movement to right wrist can twist, rotate</p> <p>10 and move all fingers."</p> <p>11 Is what she's saying:</p> <p>12 "Slightly cold to touch but good circulation."</p> <p>13 Do you understand those words?</p> <p>14 A. Yes, sir.</p> <p>15 Q. "Circulation" means your blood. You were given</p> <p>16 ibuprofen?</p> <p>17 A. Yes, sir.</p> <p>18 Q. "NO ice packs available. GP [general practitioner] to</p> <p>19 review tomorrow."</p> <p>20 Do you agree with all of that?</p> <p>21 A. Yes, sir.</p> <p>22 Q. Then seen by the same nurse within about a half an hour,</p> <p>23 apparently:</p> <p>24 "Diagnosis: reviewed after 30 minutes, he said he</p> <p>25 felt a lot better. Wrist didn't look as swollen. GP to</p> <p style="text-align: right;">Page 32</p>

<p>1 review tomorrow."</p> <p>2 Did you feel a lot better after half an hour?</p> <p>3 A. No, sir.</p> <p>4 Q. Can you understand why the nurse wrote what she did?</p> <p>5 A. Bad thing.</p> <p>6 Q. Did you go back to see her?</p> <p>7 A. I see her, but it's wrong.</p> <p>8 Q. What she says is wrong? Is that what you are telling</p> <p>9 us?</p> <p>10 A. Yes, sir.</p> <p>11 Q. You didn't feel a lot better?</p> <p>12 A. I didn't.</p> <p>13 Q. On the next page, page 3, you do get to see the doctor</p> <p>14 on 30 July at 13 minutes past 2.00. Do you see you saw</p> <p>15 Dr Husein Oozeerally. Do you remember seeing him?</p> <p>16 A. No, sir.</p> <p>17 Q. But you probably did, do you accept? There is a record</p> <p>18 here that says you went to see the doctor on the next</p> <p>19 day, the 30th?</p> <p>20 A. But I haven't seen him.</p> <p>21 Q. You haven't?</p> <p>22 A. No, sir.</p> <p>23 Q. Let's see what he wrote up about you:</p> <p>24 "Restrained yesterday."</p> <p>25 That's right:</p> <p style="text-align: center;">Page 33</p>	<p>1 we just expand this half, because I need to go to the</p> <p>2 next two or three entries. I may be wrong about that,</p> <p>3 whether you went to actually see this nurse, but she</p> <p>4 seems to write up in the history -- we don't perhaps</p> <p>5 need to worry about the first part of it. But the plan:</p> <p>6 "Ice packs not available; right arm placed in Collar</p> <p>7 'n Cuff. Advised paracetamol from wing office and</p> <p>8 given ... ibuprofen."</p> <p>9 So perhaps you went to see a nurse as well. Do you</p> <p>10 remember?</p> <p>11 A. Yes, sir.</p> <p>12 Q. Is that possible? Where you got paracetamol. Then on</p> <p>13 the 31st, so that's the next day, you see</p> <p>14 a Mrs Janina Wingert with your wrist pain problem, and</p> <p>15 you get more ibuprofen, and we can see, on 1 August, you</p> <p>16 are given more ibuprofen for the pain in the wrist and</p> <p>17 advised to take two tablets after meals. If we look at</p> <p>18 2 August, can we see you were seen by a nurse in the</p> <p>19 clinic and you said you weren't sleeping? Do you</p> <p>20 remember that?</p> <p>21 A. Yes, sir.</p> <p>22 Q. You were given advice about what would help you sleep,</p> <p>23 and then, just where the hole punch is, so we can't</p> <p>24 exactly see the date, but another date between</p> <p>25 2 and 7 August, you were given more ibuprofen for your</p> <p style="text-align: center;">Page 35</p>
<p>1 "Pain in the right forearm wrist."</p> <p>2 Did you have a pain in the right forearm wrist?</p> <p>3 A. Yes, sir.</p> <p>4 Q. "Well perfused", which is fancy medical talk for meaning</p> <p>5 the blood is circulating -- all right? -- which is</p> <p>6 similar to what the nurse had said the day before:</p> <p>7 "No neurovascular compromise."</p> <p>8 In other words, you didn't have any injury to your</p> <p>9 vessels, your nerves or anything. Then he goes through</p> <p>10 your movements, which are medical terms here, and I'm</p> <p>11 not going to go through them. But there seems to be</p> <p>12 some restriction to one aspect of the movement of your</p> <p>13 wrist, but there was a finding of normality to other</p> <p>14 aspects of movement. There was no deformity, but you</p> <p>15 were unable to flex your wrist. In other words,</p> <p>16 I suspect it means like that (indicating).</p> <p>17 The plan was to go to X-ray, and you did go to</p> <p>18 X-ray?</p> <p>19 A. Yes, sir.</p> <p>20 Q. So, looking at this, do you think it is likely you did</p> <p>21 see him, but you've just forgotten?</p> <p>22 A. No, I haven't seen him.</p> <p>23 Q. You haven't seen him. Then, on the same day, the 30th,</p> <p>24 in the entry below, about 20 minutes later, you go and</p> <p>25 see Lyn O'Doherty, another nurse. Do you see that? Can</p> <p style="text-align: center;">Page 34</p>	<p>1 wrist pain?</p> <p>2 A. Yes, sir.</p> <p>3 Q. Can we go, please, to the bottom of page 3 now, just to</p> <p>4 look at what else happened. On 11 August, you go to the</p> <p>5 surgery and you see another staff nurse by the name of</p> <p>6 Batchelor. Over the page, please. At the top, you</p> <p>7 provide the same history, that you were wounded to the</p> <p>8 right wrist and you had pain. It was noted to be</p> <p>9 healing well, no signs of infection. Bruising still</p> <p>10 apparent. And the plan was to continue to monitor you</p> <p>11 and to take medication.</p> <p>12 On the next day, 12 August, paracetamol prescribed.</p> <p>13 On 14 August, paracetamol prescribed. I can probably</p> <p>14 summarise the rest of the entries on that page in this</p> <p>15 way: on the 15th or the 16th, the 18th, the 19th, the</p> <p>16 20th, the 23rd and 24 August, you were prescribed</p> <p>17 paracetamol, and onto the next page, please, just to</p> <p>18 finish off this list, on the 25th and again on the 27th,</p> <p>19 paracetamol. Although, on the 25th, it looks like you</p> <p>20 had a headache and maybe that's why you were prescribed</p> <p>21 paracetamol. Do you remember going to healthcare on all</p> <p>22 of those occasions, or at least remember some of those</p> <p>23 occasions?</p> <p>24 A. I remember some of them.</p> <p>25 Q. Do you think you were feeling better by this time, as</p> <p style="text-align: center;">Page 36</p>

1 the days went past, in August, from July -- the July
 2 events? We have got about three or four weeks of August
 3 entries here. Did your --
 4 **A. No, sir.**
 5 Q. Did the injury improve?
 6 **A. No, sir.**
 7 Q. You don't think it did?
 8 **A. No, sir.**
 9 Q. Not even with paracetamol?
 10 **A. No, sir.**
 11 Q. Now let me ask you about something else, please. When
 12 you arrived at Brook House -- do you remember we saw
 13 right at the beginning of these medical notes that you
 14 said nothing about any torture; yes?
 15 **A. Yes, sir.**
 16 Q. But whether or not you had said anything about torture,
 17 and you say, as I understand you, that you didn't suffer
 18 torture in Afghanistan, but, nonetheless, was any
 19 assessment made of you when you arrived at Brook House
 20 under rule 35, for example, whether detention at
 21 Brook House would be injurious, would harm you? Did you
 22 go through that process? Do you remember?
 23 **A. I don't remember, sir.**
 24 Q. You don't remember. You know what I'm talking about,
 25 rule 35, don't you?

Page 37

1 **A. No, sir.**
 2 Q. Did you ever self-harm?
 3 **A. No, sir.**
 4 Q. Did you ever think about ending your life?
 5 **A. Yes, sir.**
 6 Q. Was it a serious intention or was it just something that
 7 passed through your head from time to time?
 8 **A. Serious, sir.**
 9 Q. But you never made an attempt?
 10 **A. No, sir.**
 11 Q. The guard who you spoke to about your mental health, do
 12 you know who that was?
 13 **A. No, sir.**
 14 Q. Was it male or female?
 15 **A. Male, sir.**
 16 Q. Was it a manager or an officer?
 17 **A. Just an officer. Officer.**
 18 Q. An officer. What did you think of the healthcare
 19 facilities at Brook House generally? Were they good or
 20 bad? Did they try their best? What did you think?
 21 **A. They're bad, sir.**
 22 Q. They're bad?
 23 **A. Yes, sir.**
 24 Q. Why are they bad?
 25 **A. Because they can't help anyone because there was -- I'm**

Page 39

1 **A. Yes, sir.**
 2 Q. I think you have indicated already that you struggled
 3 with your mental health. Did you speak to anybody about
 4 your mental health?
 5 **A. Yes, sir.**
 6 Q. Who did you speak to?
 7 **A. I spoke to -- with security guard.**
 8 Q. What happened?
 9 **A. They were -- first they say, "I'm going to check up and**
 10 **will let you know", but they didn't.**
 11 Q. Were you ever put on -- have you heard of ACDT?
 12 **A. Yes, sir.**
 13 Q. Were you ever put on ACDT?
 14 **A. No, sir.**
 15 Q. Any observations of you?
 16 **A. No, sir.**
 17 Q. Was any form opened on you, do you know, to monitor you?
 18 **A. No, sir.**
 19 Q. When you saw the security guard, what did you say to him
 20 or her? What did you say?
 21 **A. I just say -- they said to me I have to go to the clinic**
 22 **and tell them. "They will help you". I went there,**
 23 **they said, "We are busy. We will let you know". But**
 24 **no-one.**
 25 Q. Did you get anything from them?

Page 38

1 **sorry.**
 2 THE CHAIR: Take your time. It's fine.
 3 MR ALTMAN: Do you want a break, or are you all right?
 4 **A. I'm all right.**
 5 Q. Are you okay? I was asking you why you felt they were
 6 bad, and you were about to tell us. What was bad about
 7 them? Was it the people or was it they didn't have
 8 enough people to help and there were too many detained
 9 men? What was it?
 10 **A. There was not enough people to help.**
 11 Q. But the people you saw, do you think, when you saw them,
 12 they were trying their best, or did you feel that they
 13 were a bit rushed, they rushed you?
 14 **A. They were rushed.**
 15 Q. They didn't have time for you?
 16 **A. Yes, sir.**
 17 Q. Is that what you were feeling?
 18 **A. Yes, sir.**
 19 Q. Chair, I'm going to take this quite shortly, because
 20 otherwise it is a bit document heavy. I'm going to
 21 perhaps put on the record what the documents are, but
 22 I think I can ask the witness this in short measure,
 23 rather than, as it were, going around the houses. But
 24 he deals with this at paragraphs 78 and onwards.
 25 THE CHAIR: Thank you.

Page 40

10 (Pages 37 to 40)

<p>1 MR ALTMAN: Did you engage solicitors at some point?</p> <p>2 A. Yes. Yes, sir.</p> <p>3 Q. Did you make complaint in the courts about how you were</p> <p>4 treated on 29 July?</p> <p>5 A. Yes, sir.</p> <p>6 Q. Chair, there is in the documentation a series of letters</p> <p>7 from Duncan Lewis, this gentleman's solicitors. They</p> <p>8 relate to -- I'm simply going to list what they are,</p> <p>9 rather than take the witness to the documentation. It</p> <p>10 won't profit overmuch by doing so. But the first of</p> <p>11 the documents is <HOM0322322> at pages 1 to 2. We don't</p> <p>12 need to put these up. What they show is Duncan Lewis,</p> <p>13 on 27 August, requested to cancel the removal</p> <p>14 directions. That was going to be the second attempt to</p> <p>15 remove the witness.</p> <p>16 Then if I have understood the chronology correctly,</p> <p>17 another document, <HOM0322339> at pages 1 to 3. These</p> <p>18 are all in your bundles, chair. This was another letter</p> <p>19 from Duncan Lewis, a letter before action, dated</p> <p>20 6 September 2017, so while the witness was still at</p> <p>21 Brook House, to the Secretary of State for the Home</p> <p>22 Department, concerning the attempted removal on 29 July,</p> <p>23 and in order to cancel the removal directions.</p> <p>24 The third in the chronology is a letter before</p> <p>25 action directed at the Home Office, this one dated</p> <p style="text-align: center;">Page 41</p>	<p>1 A. No, sir.</p> <p>2 Q. Let's see if perhaps we can put up on screen this</p> <p>3 document, <DL0000084>. It's at tab 6, chair. Let me</p> <p>4 just get the right pagination, if I can. I hope it's at</p> <p>5 page 27. Can we go back one page, please, to page 26.</p> <p>6 This is the letter you got. It's dated 9 October as</p> <p>7 a result of your complaints to the Professional</p> <p>8 Standards Unit of the Home Office:</p> <p>9 "I am writing in response to your complaint of</p> <p>10 30 July ..."</p> <p>11 So this was one complaint that clearly was taken</p> <p>12 seriously:</p> <p>13 "... regarding your treatment by Tascor overseas</p> <p>14 escorts during your attempted removal on 29 July at</p> <p>15 Gatwick Airport."</p> <p>16 Then there is a series of paragraphs I don't need to</p> <p>17 read, but can we go to the next page, please, and look</p> <p>18 at what the allegation was that you made:</p> <p>19 "Allegation one.</p> <p>20 "That you were treated like an animal and</p> <p>21 embarrassed by the Tascor officers' method of removing</p> <p>22 you."</p> <p>23 Under the heading "Review":</p> <p>24 "In your complaint and at interview ..."</p> <p>25 So that's when they spoke to you:</p> <p style="text-align: center;">Page 43</p>
<p>1 30 October 2017, so about two weeks before he was</p> <p>2 eventually released on bail, this being <HOM0322313></p> <p>3 between pages 2 and 5, making submissions to the</p> <p>4 Home Office that there had been breaches in this</p> <p>5 witness's case of articles 3, 5 and 8 of the European</p> <p>6 Convention, as well as breaches of the Detention Centre</p> <p>7 Rules.</p> <p>8 Then, finally, a letter before claim originating</p> <p>9 from Duncan Lewis, this being <DL0000084> at page 1 and</p> <p>10 onwards, a claim to Tascor, this dated 29 June 2018, in</p> <p>11 relation to what happened on 29 July.</p> <p>12 I'm going to ask you this, and I hope you understood</p> <p>13 what I was just saying to the chair, it just makes it</p> <p>14 easier so I don't take you through all of these</p> <p>15 documents, but they are available, and I'm going to ask</p> <p>16 for them to be published in full, all of the ones I just</p> <p>17 listed.</p> <p>18 Do you remember complaining and being interviewed by</p> <p>19 a woman, Maria Brown? Do you remember an interview with</p> <p>20 you, on 26 August, regarding your complaint about the</p> <p>21 attempted removal on 29 July?</p> <p>22 A. Yes, sir.</p> <p>23 Q. Do you remember that the Home Office Professional</p> <p>24 Standards Unit did not uphold your allegations? Do you</p> <p>25 remember that? Do you understand what I mean?</p> <p style="text-align: center;">Page 42</p>	<p>1 "... you stated that you felt that you were being</p> <p>2 treated like an animal or criminal because of the way</p> <p>3 that people were looking at you."</p> <p>4 Then the paragraphs continue. The next paragraph</p> <p>5 down:</p> <p>6 "You were accompanied by 3 detention custody</p> <p>7 officers from Tascor, the Home Office contractor used to</p> <p>8 escort detainees out of the country. You were placed in</p> <p>9 a waist restraint belt and were escorted to Gatwick</p> <p>10 Airport to board your first flight, to Istanbul.</p> <p>11 "In any escorted overseas removal, there will be</p> <p>12 a minimum of three escorts. This is the minimum number</p> <p>13 of people required to form a removal team. Escorts do</p> <p>14 not wear a uniform and instead wear business attire so</p> <p>15 as not to draw attention to themselves or the person</p> <p>16 they are accompanying."</p> <p>17 You will have seen this letter, I'm sure.</p> <p>18 A. Yes, sir.</p> <p>19 Q. But stop me if you haven't understood anything. She</p> <p>20 says:</p> <p>21 "I have reviewed the person escort record for your</p> <p>22 removal. This shows that from Brook House onwards the</p> <p>23 escorts regularly offered you refreshments and toilet</p> <p>24 breaks. The escorts provided their accounts, recalling</p> <p>25 how they offered you the use of their telephone and</p> <p style="text-align: center;">Page 44</p>

<p>1 tried to talk to you throughout their journey. They</p> <p>2 recalled that your responses and body language added to</p> <p>3 their concern that you intended to disrupt your flight.</p> <p>4 No force had been used on you until you were on the</p> <p>5 aircraft and the person escort record shows that there</p> <p>6 were no issues with the removal until you were on board.</p> <p>7 "I have also reviewed the vehicle CCTV. This shows</p> <p>8 the escorts offering you refreshment, offering the</p> <p>9 telephone, providing the information leaflet ...", and</p> <p>10 other such facilities. Can we turn the page, please:</p> <p>11 "You were wearing a waist restraint belt ...</p> <p>12 a Home Office approved restraint made of fabric and the</p> <p>13 wrist cuffs consist of velcro straps."</p> <p>14 Next paragraph -- I'm just summarising some of it</p> <p>15 for you:</p> <p>16 "Placing a detainee in a waist restraint belt is not</p> <p>17 a matter of procedure, it is based on the actions of</p> <p>18 the detainee and the escorts' decision on the risks</p> <p>19 present at the time and in the immediate future."</p> <p>20 I'm going to stop there for a moment. Did you</p> <p>21 think, from anything you had done on the attempted</p> <p>22 removal on 29 July, that you deserved to be put in</p> <p>23 a wrist restraint belt? Had you done anything before to</p> <p>24 say to the escort that a waist restraint belt should be</p> <p>25 used in your case?</p> <p style="text-align: center;">Page 45</p>	<p>1 satisfied that the escorting team made the correct</p> <p>2 decision to place you in the waist restraint belt."</p> <p>3 Therefore, she concludes, at the bottom of this</p> <p>4 page:</p> <p>5 "You have complained that you were treated like an</p> <p>6 animal or a criminal during your transfer to the</p> <p>7 aircraft. Having reviewed all the available evidence,</p> <p>8 I am satisfied that the escorts have treated you with</p> <p>9 dignity and showed you the appropriate duty of care."</p> <p>10 On the right-hand side on the next page:</p> <p>11 "Allegation two.</p> <p>12 "That Tascor officers used inappropriate or</p> <p>13 excessive use of force."</p> <p>14 I'm not going to go through all of this. She had</p> <p>15 clearly spoken to you, she had spoken to the escorts,</p> <p>16 and all of this is available and will be available</p> <p>17 publicly, but on the conclusion page, please, on</p> <p>18 page 8 -- no, it must be the page before. Sorry, I have</p> <p>19 different pagination. If you can go back, please. It</p> <p>20 may be page 7. <DL0000084>. I think it is page 7 or 8.</p> <p>21 It is my fault, it is probably 33. I'm looking at</p> <p>22 different pagination. That's it. At the top:</p> <p>23 "In light of the available evidence, I am satisfied</p> <p>24 on the balance of probability that the escorts did not</p> <p>25 assault you."</p> <p style="text-align: center;">Page 47</p>
<p>1 A. No, sir.</p> <p>2 Q. "The senior detainee custody officer ... recalled ..."</p> <p>3 So she obviously interviewed you and she interviewed</p> <p>4 others:</p> <p>5 "... that at Brook House ... you stated that you</p> <p>6 were happy to go ahead with the removal but that your</p> <p>7 body language was a cause for concern, indicating that</p> <p>8 you were not being truthful."</p> <p>9 So what she's recording there is that, despite the</p> <p>10 fact you were saying you were willing to go, the senior</p> <p>11 detainee custody officer, apparently a reader of your</p> <p>12 body language, was able to come to a different</p> <p>13 conclusion:</p> <p>14 "... was a cause for concern, indicating that you</p> <p>15 were not being truthful. [He] recalled that you [were]</p> <p>16 just smiling, not looking at the escorts, and did not</p> <p>17 have answers to their questions about your return and</p> <p>18 well-being in Afghanistan. It was your lack of concern</p> <p>19 about your own well-being and lack of plans in</p> <p>20 Afghanistan that alerted the escorts to the possibility</p> <p>21 that you intended to disrupt your removal.</p> <p>22 >Your negative body language was recalled by the</p> <p>23 rest of the escorting team."</p> <p>24 Then to the paragraph beginning:</p> <p>25 "In light of your behaviour at Brook House ... I am</p> <p style="text-align: center;">Page 46</p>	<p>1 So you see she's weighed in the balance what you</p> <p>2 say, on the one hand, and what the escorts have said, on</p> <p>3 the other, and she says that there was no assault on</p> <p>4 you. You've read this letter before, haven't you, and</p> <p>5 you understand what it says?</p> <p>6 A. Yes, sir.</p> <p>7 Q. That the Professional Standards Unit investigator</p> <p>8 disagreed with both of your complaints. All I want to</p> <p>9 ask you is, now that you know, and you have known this</p> <p>10 for some time, this decision document being dated</p> <p>11 9 October 2017, do you agree with it?</p> <p>12 A. No, sir.</p> <p>13 Q. Do you agree with what she said?</p> <p>14 A. No, sir.</p> <p>15 MR ALTMAN: Chair, I see the time. I'm going to ask if now</p> <p>16 is a good time to have a break. If we have our shorter</p> <p>17 break now, and once I have finished the witness, I will</p> <p>18 ask for the longer break so we can move on to the next</p> <p>19 witness, please.</p> <p>20 THE CHAIR: We will return at 11.10 am. Thank you very</p> <p>21 much.</p> <p>22 (10.54 am)</p> <p>23 (A short break)</p> <p>24 (11.17 am)</p> <p>25 MR ALTMAN: Can we put up on screen, please, <DL0000075> at</p> <p style="text-align: center;">Page 48</p>

12 (Pages 45 to 48)

<p>1 page 15. It is something I started looking at a little 2 earlier, before I was stopped. But I can look at it 3 now. It is the bottom half of the page, after the 4 question at paragraph 38. This is something your own 5 psychiatrist reported about you. Do you remember we 6 looked at the psychiatric report of November 2017, just 7 before you were released on bail? I just want to read 8 what he reported that you must have told him: 9 "As D1618 was boarding the plane, after being told 10 of his forced removal from the UK, during the first 11 incident of attempted removal ..." 12 So that's about 29 July: 13 "... he said that he did not want to get on board 14 because he said that his life was in danger if he went 15 to Afghanistan." 16 Is that right? 17 A. That's right. 18 Q. "The security guards who were with him then placed 19 handcuffs on each wrist." 20 Is that right? 21 A. Yes, sir. 22 Q. "At this point [you] started shouting." 23 That's what you told the psychiatrist. Do you agree 24 you told the psychiatrist that? 25 A. Yes, sir.</p> <p style="text-align: center;">Page 49</p>	<p>1 in pain and also started crying uncontrollably ..." 2 A. Yes, sir. 3 Q. Do you remember saying that? 4 A. Yes, sir. 5 Q. Was it true? 6 A. Yes, sir. 7 Q. "... some of the screaming and crying may have been due 8 to the pain that he was experiencing due to the hand 9 restraints." 10 Did you say it? 11 A. Yes, sir. 12 Q. Was it true? 13 A. Yes, sir. 14 Q. "He felt that they pressed them in too much and that 15 blood was now beginning to come out of his wrists." 16 Is that right? 17 A. Yes, sir. 18 Q. Now, the psychiatrist continues, and I have asked you 19 those questions on behalf of the Home Office, who have 20 asked us to ask you those questions. I'm now going to 21 ask you about the next passage on behalf of G4S, the 22 company that ran Brook House: 23 "The most obvious symptom that D1618 had after the 24 first attempt at removal effort was that he was very 25 avoidant of the planes that surrounded the detention</p> <p style="text-align: center;">Page 51</p>
<p>1 Q. "He told them [that's you] that he was trying to get 2 across to them that his life was in danger if he went 3 back to Afghanistan." 4 Is that correct? 5 A. Yes, sir. 6 Q. "They said they used the hand restraints in order to 7 force him onto the plane." 8 Is that what you told the psychiatrist? 9 A. Yes, sir. 10 Q. "He continued shouting, saying he did not want to go 11 back to Afghanistan and he started screaming at this 12 point." 13 Do you agree you said that? 14 A. Yes, sir. 15 Q. Do you agree it was truthful? 16 A. Yes, sir. 17 Q. "The guard said that the more that he screamed, the 18 tighter they would put the hand restraints." 19 Do you remember that? The more you screamed, the 20 tighter they would make the hand restraints? Do you 21 remember -- you said this to the psychiatrist? 22 A. Yes, sir. 23 Q. If you said it, was it true? 24 A. It's true, sir. 25 Q. "As they tightened the hand restraints, he was screaming</p> <p style="text-align: center;">Page 50</p>	<p>1 centre." 2 Do you know what that means? You didn't like seeing 3 the planes, or perhaps hearing them, around Gatwick, 4 because the centre is right close to the runway. Do you 5 remember not liking hearing and seeing planes? 6 A. Yes, sir. 7 Q. That's what the psychiatrist is saying. In fact, your 8 bedroom window faced one of the runways at Gatwick. Do 9 you remember? You could see the planes coming and 10 going? 11 A. Yes, sir. 12 Q. That's what the psychiatrist is saying. You were 13 traumatised, quite traumatised, by this; so much so that 14 you asked the staff at Brook House to change your 15 bedroom so that you would not have to keep seeing the 16 planes taking off. Do you remember that? 17 A. Yes, sir. 18 Q. Do you remember that they did allow you to change your 19 room so you didn't have to see the planes? 20 A. Yes, sir. 21 Q. So they were sensitive to your wishes certainly on this 22 occasion? 23 A. I just went many times to the office and finally they 24 changed my room. 25 Q. But you understand when I ask you they were sensitive</p> <p style="text-align: center;">Page 52</p>

<p>1 about it?</p> <p>2 A. Yes, sir.</p> <p>3 Q. Let me move on, finally, just to ask you about the</p> <p>4 impact of detention on you at Brook House, and of course</p> <p>5 the attempted removal. This is, chair, paragraph 81 and</p> <p>6 onwards of the witness's inquiry statement. In actual</p> <p>7 fact, forgive me, it is 82, I think. It could be 81,</p> <p>8 depending on the version you have.</p> <p>9 Do you remember saying in your inquiry statement</p> <p>10 that you found it difficult to cope whilst you were at</p> <p>11 Brook House? Do you understand that, "difficult to</p> <p>12 cope", difficult to -- when you were living at</p> <p>13 Brook House, and so you became depressed? Do you</p> <p>14 remember saying that?</p> <p>15 A. Yes, sir.</p> <p>16 Q. You would have to go and try and find places to be by</p> <p>17 yourself to find some space?</p> <p>18 A. Yes, sir.</p> <p>19 Q. Do you remember saying that? You would like to listen</p> <p>20 to music and close your eyes?</p> <p>21 A. Yes, sir.</p> <p>22 Q. Imagining yourself elsewhere?</p> <p>23 A. Yes, sir.</p> <p>24 Q. You say that your mental health deteriorated whilst you</p> <p>25 were at Brook House. Do you understand the word</p> <p style="text-align: center;">Page 53</p>	<p>1 A. Yes, sir.</p> <p>2 Q. Do you say that whilst your immigration status has been</p> <p>3 resolved, your poor mental health has continued?</p> <p>4 A. Yes, sir.</p> <p>5 Q. You believe that your experiences in Brook House were</p> <p>6 a significant factor in your poor mental health; is that</p> <p>7 right?</p> <p>8 A. Yes, sir.</p> <p>9 Q. When you say "your experiences at Brook House", does</p> <p>10 that include what happened on the plane at Gatwick on</p> <p>11 29 July?</p> <p>12 A. Yes, sir.</p> <p>13 Q. Has that contributed to your poor mental health?</p> <p>14 A. Yes, sir.</p> <p>15 MR ALTMAN: Chair, that's all I propose asking this witness,</p> <p>16 unless you have any questions?</p> <p>17 THE CHAIR: I just have one question, sir, if I may.</p> <p>18 You talked about when you filled in complaints</p> <p>19 forms, when you made complaints and you had to write it</p> <p>20 down, you couldn't just tell a member of staff about it,</p> <p>21 they told you to write it down. Did you have to write</p> <p>22 it in English?</p> <p>23 A. I haven't write it. One of my friends write it in</p> <p>24 English, yes.</p> <p>25 THE CHAIR: Would you have been able to write it yourself or</p> <p style="text-align: center;">Page 55</p>
<p>1 "deteriorated"? It's in your statement. It means your</p> <p>2 mental health worsened?</p> <p>3 A. Yes, sir.</p> <p>4 Q. Is that what you say, that your mental health worsened</p> <p>5 while you were at Brook House?</p> <p>6 A. Yes, sir.</p> <p>7 Q. When you were released, I think you went to live with</p> <p>8 your father. I don't want to know where, but you went</p> <p>9 to live with your father; is that correct?</p> <p>10 A. Yes, sir.</p> <p>11 Q. But you had nightmares and you would find yourself</p> <p>12 shouting at night, and so you had to move elsewhere?</p> <p>13 A. Yes, sir.</p> <p>14 Q. Because your father couldn't live with you --</p> <p>15 A. Yes, sir.</p> <p>16 Q. -- is that right? Eventually, you were granted leave to</p> <p>17 remain and you moved to a YMCA?</p> <p>18 A. Yes, sir.</p> <p>19 Q. You remember telling us that you were diagnosed with</p> <p>20 PTSD?</p> <p>21 A. Yes, sir.</p> <p>22 Q. Do you still take medication?</p> <p>23 A. Yes, sir.</p> <p>24 Q. Do you still see a doctor or a psychiatrist from time to</p> <p>25 time?</p> <p style="text-align: center;">Page 54</p>	<p>1 did you have to ask somebody for their help to do it?</p> <p>2 A. Somebody.</p> <p>3 THE CHAIR: Thank you very much.</p> <p>4 MR ALTMAN: Thank you very much for coming.</p> <p>5 Chair, the next witness will be D1851. Although we</p> <p>6 have recently had a short break, what I am going to ask,</p> <p>7 in order, first, obviously that I can meet him,</p> <p>8 secondly, that he can see the hearing room, and, third,</p> <p>9 as it were, just a half an hour's cordon sanitaire, that</p> <p>10 would be helpful.</p> <p>11 THE CHAIR: Ms Morris, did you want to say something before</p> <p>12 we break?</p> <p>13 MS MORRIS: Yes, chair. Just before this witness is</p> <p>14 released, there was just one additional area which</p> <p>15 I wondered if it could be covered. I wonder, chair, if</p> <p>16 you could just rise for five minutes, while I have --</p> <p>17 MR ALTMAN: No, I would rather you didn't rise for five</p> <p>18 minutes, because otherwise, chair, you will be in and</p> <p>19 out of the room. If Ms Morris can tell me what it is,</p> <p>20 I will consider it, and if it is a different topic, then</p> <p>21 it would have to be raised in the usual way.</p> <p>22 THE CHAIR: I shall avert my eyes and allow you to have</p> <p>23 a small conversation.</p> <p>24 Sir, are you okay for a few moments, while they</p> <p>25 discuss?</p> <p style="text-align: center;">Page 56</p>

<p>1 A. Yes.</p> <p>2 MR ALTMAN: Chair, I was aware of what's being suggested.</p> <p>3 It has already been suggested. It is not a topic that</p> <p>4 I'm aware of that was ever raised in a rule 10. As far</p> <p>5 as I recall it, it doesn't even arise in a statement or</p> <p>6 in the inquiry statement that I have seen. If it can be</p> <p>7 pointed out to me that I'm mistaken about that, then</p> <p>8 I'll stand to be corrected. It is a small issue, and it</p> <p>9 could be asked, but I have to say I'd already made</p> <p>10 a decision, but it is a different topic, and if it needs</p> <p>11 to be raised, then you will have to make a determination</p> <p>12 about it.</p> <p>13 THE CHAIR: Okay, understood. Thank you for your advice,</p> <p>14 Mr Altman.</p> <p>15 Sir, if I can just thank you very much for coming.</p> <p>16 I know it is not a very easy experience, but I'm very</p> <p>17 grateful for your evidence today. Thank you.</p> <p>18 A. Thank you.</p> <p>19 (The witness withdrew)</p> <p>20 THE CHAIR: We will return at 12.00 noon. Thank you.</p> <p>21 (11.28 am)</p> <p>22 (A short break)</p> <p>23 (12.03 pm)</p> <p>24 MR ALTMAN: Chair, the gentleman in the witness box is</p> <p>25 D1851.</p> <p style="text-align: center;">Page 57</p>	<p>1 Q. You say, in fact, you've always had a legal right to</p> <p>2 remain in this country under EU law because you are the</p> <p>3 spouse of an EU citizen?</p> <p>4 A. Yes, I got married to one.</p> <p>5 Q. Can I ask you to move forward, because I can hardly hear</p> <p>6 you.</p> <p>7 A. Okay.</p> <p>8 Q. If I can't hear you, nobody else is going to hear you.</p> <p>9 A. All right.</p> <p>10 Q. That's a bit better. Now, you say that you were</p> <p>11 detained unlawfully at Brook House, and the period that</p> <p>12 you were unlawfully detained was from 29 April 2017 to</p> <p>13 24 July of that year, for around 12 weeks. Is that</p> <p>14 right?</p> <p>15 A. Yes, my recollection, that would be right. I said, "To</p> <p>16 my recollection, that would be right".</p> <p>17 Q. Perhaps we can bring the microphone a little closer,</p> <p>18 please, to the witness. It is just we want to hear you,</p> <p>19 and that's why the microphone --</p> <p>20 A. Okay.</p> <p>21 Q. That's probably better. Tell us just a little for now,</p> <p>22 by way of introduction, about the nature of your</p> <p>23 detention at Brook House. Was it something you found an</p> <p>24 easy experience?</p> <p>25 A. Detention at Brook House for me, personally, and it was</p> <p style="text-align: center;">Page 59</p>
<p>1 THE CHAIR: Thank you very much for coming to give evidence</p> <p>2 today. Perhaps I can just start by saying that, for</p> <p>3 reasons that you will understand, I'm not going to refer</p> <p>4 to you by your name. I apologise for the fact that that</p> <p>5 feels very impersonal, but I will just refer to you as</p> <p>6 "sir". Thank you.</p> <p>7 WITNESS D1851 (affirmed)</p> <p>8 Examination by MR ALTMAN</p> <p>9 MR ALTMAN: As I have said and introduced you, you are known</p> <p>10 as D1851 for the purposes of this inquiry. A little</p> <p>11 about your background, please. Can you confirm -- and</p> <p>12 you have your statement in front of you if you need to</p> <p>13 use it from time to time, and, as you know, I will</p> <p>14 direct you to any relevant paragraph numbers, but let's</p> <p>15 see how we do -- you're employed, or you have been</p> <p>16 employed, in the social sector; is that right?</p> <p>17 A. Exactly, sir, yes.</p> <p>18 Q. You say in your statement you're a company director</p> <p>19 working as a gem stone dealer and you're currently</p> <p>20 studying aeronautical engineering at university?</p> <p>21 A. Is that right.</p> <p>22 Q. A Nigerian national?</p> <p>23 A. Yes, sir.</p> <p>24 Q. How old are you now?</p> <p>25 A. I'm 31 now.</p> <p style="text-align: center;">Page 58</p>	<p>1 for the majority of the detainees, was never really</p> <p>2 a good experience. Something you never want to</p> <p>3 experience in your life.</p> <p>4 Q. How did it affect your mental health?</p> <p>5 A. Finding the right word is a pretty hard one, but I think</p> <p>6 the easiest one would be "crushing".</p> <p>7 Q. Crushing?</p> <p>8 A. Yes, because it made me a different person.</p> <p>9 Q. Did it make you ill?</p> <p>10 A. Sorry. Okay. Yeah.</p> <p>11 THE CHAIR: Take your time. There is no rush.</p> <p>12 A. It did.</p> <p>13 MR ALTMAN: Let me see if I can put the words, and you can</p> <p>14 tell me if I am right, because I'm simply taking this</p> <p>15 from your statement. Were you diagnosed with</p> <p>16 post-traumatic stress disorder, anxiety and depression</p> <p>17 as a result of the period that you sustained in</p> <p>18 detention?</p> <p>19 A. Yes. After I left detention, I think there was</p> <p>20 a realisation that everything was different for me.</p> <p>21 Initially, I think the first two/three months, I just</p> <p>22 thought it's something I could brush off, but at some</p> <p>23 point I had to face the reality that I was a different</p> <p>24 person and that was when I made the decision to go and</p> <p>25 see my GP about it, and I was referred to an expert, and</p> <p style="text-align: center;">Page 60</p>

<p>1 that was where I was initially diagnosed with,</p> <p>2 potentially, PTSD, depression and anxiety.</p> <p>3 Q. We will come back to aspects of that a little later, if</p> <p>4 we may.</p> <p>5 I'm going to ask you about various events, but one</p> <p>6 of the events we will come back to, which you</p> <p>7 characterise as a significant event, was when you say</p> <p>8 you were assaulted and unlawfully pinned down by</p> <p>9 detention officers on 5 June.</p> <p>10 A. Mmm.</p> <p>11 Q. That's when you were sharing a room on the wing with</p> <p>12 D390, somebody we will know as 390, all right. But, as</p> <p>13 I say, I will come back to that.</p> <p>14 Your release from detention on 24 July followed</p> <p>15 a successful bail application; is that right?</p> <p>16 A. Mmm, that is right.</p> <p>17 Q. With certain bail conditions. Those conditions, did</p> <p>18 they -- were they maintained for very long?</p> <p>19 A. The condition was -- I believe initially was for</p> <p>20 six months with me having to report, I believe, weekly</p> <p>21 at Lunar House back then.</p> <p>22 Q. Presumably, you found that quite difficult as well, even</p> <p>23 though you were out of detention by now?</p> <p>24 A. Yeah, the process was actually before I went to</p> <p>25 detention, I was reporting, so it was while I was</p> <p style="text-align: center;">Page 61</p>	<p>1 naive because, until that point, I've always told myself</p> <p>2 that there is no way that would happen because</p> <p>3 I believed there was an ongoing application with the</p> <p>4 Home Office then, and I just don't see any reason why</p> <p>5 they will do that because they were in communication</p> <p>6 with my solicitor back then. So the day I went, to me,</p> <p>7 it was just me coming to London to report and go back</p> <p>8 home, until I got there and I was ushered into some</p> <p>9 other section of the building and being --</p> <p>10 Q. Was this in Croydon?</p> <p>11 A. It was in Croydon, Lunar House.</p> <p>12 Q. Eventually, you were transported -- I'm going to, if</p> <p>13 you'll forgive me, cut this slightly short -- to</p> <p>14 Brook House near Gatwick; is that correct?</p> <p>15 A. Yes, I was. That was after being locked in in the room</p> <p>16 at Lunar House for about -- for more than six hours.</p> <p>17 That was -- I believe I was locked in at about 1.00 pm</p> <p>18 in the afternoon, and I was only picked up at around</p> <p>19 11.00/11.30 in the night.</p> <p>20 Q. And do you remember arriving at Brook House in the early</p> <p>21 hours of the following morning?</p> <p>22 A. Yes.</p> <p>23 Q. Around 2.00 o'clock. You felt it -- I'm looking at what</p> <p>24 you say at your paragraph 16 -- "resembled a prison and</p> <p>25 was very imposing"?</p> <p style="text-align: center;">Page 63</p>
<p>1 reporting that I was detained. When I was -- when</p> <p>2 I finally got the bail at my second bail hearing, I had</p> <p>3 to go into reporting again, and this time it was</p> <p>4 actually weekly, so it's more of a continuous process.</p> <p>5 Q. You provide in your witness statement a lot of</p> <p>6 information about your immigration background. Chair,</p> <p>7 the statement is <DL00000143>. As before, I'm going to</p> <p>8 ask that that be adduced in totality.</p> <p>9 THE CHAIR: Agreed, thank you.</p> <p>10 MR ALTMAN: What that means, so that you understand, is</p> <p>11 that, even though I may not ask you, and almost</p> <p>12 certainly won't be asking you, every question about</p> <p>13 every fact you mention, your statement is available and</p> <p>14 will be available publicly.</p> <p>15 A. Okay.</p> <p>16 Q. And the chair will have it available to her for her</p> <p>17 purposes later in the course of this inquiry.</p> <p>18 I want to ask you, really, about your detention, and</p> <p>19 paragraph 12 is the paragraph where it begins. You will</p> <p>20 remember being detained on 28 April, when you were</p> <p>21 reporting, which is what you have just told us.</p> <p>22 I assume you had no idea it was going to happen?</p> <p>23 A. No.</p> <p>24 Q. Total shock?</p> <p>25 A. I think nowadays, I tell myself maybe I was just being</p> <p style="text-align: center;">Page 62</p>	<p>1 A. Yeah, I don't think there is any other name for what it</p> <p>2 looked like than a prison, because there were barbed</p> <p>3 wires, high fences and the normal kind of huge gates you</p> <p>4 have in prison. I have never been to prison before, but</p> <p>5 I've seen movies and seen the news, so that's just what</p> <p>6 it looked like.</p> <p>7 Q. When you arrived, did you go through any induction</p> <p>8 process?</p> <p>9 A. Not that I can remember. When I arrived, I was only</p> <p>10 locked in another room for -- for nearly two hours, or</p> <p>11 an hour or more.</p> <p>12 Q. Did you meet a healthcare professional to begin with, at</p> <p>13 one point?</p> <p>14 A. At one point, after several waiting, and, yeah, I met</p> <p>15 a lady that I came to know later to be --</p> <p>16 Q. Was it a staff nurse by the name of Wingert?</p> <p>17 A. I can't really remember her name, but I think, after</p> <p>18 speaking to my solicitors appointed, they made me know</p> <p>19 that that will have been her name.</p> <p>20 Q. So we are clear, whoever this person may have been, when</p> <p>21 you were admitted into detention at Brook House, how</p> <p>22 long after that did you first see any healthcare staff</p> <p>23 member? Was it the same time or some other time?</p> <p>24 A. It was the same night. Probably about maybe three --</p> <p>25 maybe two to three hours after I got to Brook House.</p> <p style="text-align: center;">Page 64</p>

1 Q. This was in reception, presumably?

2 **A. It was -- it was in the reception, but more like a room**

3 **after the reception.**

4 Q. So did you have to wait in the reception area for some

5 time before being seen?

6 **A. Yes, before even being seen at the reception where I had**

7 **to wait for about an hour and a half or two hours.**

8 Q. You remember this kind of thing happening, your phone

9 being taken off you and you being supplied with a basic

10 phone by Brook House?

11 **A. Yes, my phone had been taken off me while I was in**

12 **Lunar House. That was since -- that was the last time**

13 **I had access to my phone.**

14 Q. But you were supplied with another one?

15 **A. Unfortunately, that was probably about a week and a half**

16 **after I got to detention, I was able -- I was --**

17 **I had -- I was supplied a mobile phone.**

18 Q. Which meant that you were cut off from the outside world

19 for some time?

20 **A. Yes, which made it really hard because, like I said,**

21 **I was still naive because, at this point, I thought**

22 **there might have been some error in the process, and**

23 **I thought if I could have contact with my solicitor,**

24 **they would be able to rectify it and speak with the**

25 **Home Office. But I couldn't get in contact with anyone,**

Page 65

1 **not even with my partner there.**

2 Q. So your partner didn't know where you were?

3 **A. No, she didn't.**

4 Q. Do you remember when you were admitted and spoke to

5 healthcare whether you were asked about any mental

6 health issues that you might have had?

7 **A. I definitely can't recollect anything of such, no.**

8 Q. Did you have any mental health problems before you were

9 detained?

10 **A. No, I didn't.**

11 Q. In general terms, how did you find the staff at

12 Brook House? Were they all good or were they all bad or

13 was there something in between?

14 **A. Okay. I think maybe a lot of people here will**

15 **understand the detention system is a system of --**

16 **I don't know how to put it -- the oppressed and the**

17 **oppressor. Someone has the power and you are the one**

18 **that the power is being used on. And being a detainee,**

19 **you are reminded of that every day in any form. If it's**

20 **them not caring, the words they use towards you -- yeah,**

21 **you're reminded and being told, "You should know your**

22 **place". So those that try their best, try their best;**

23 **but the majority was more, they don't care. They just**

24 **see you as a waste. They don't -- the attitude you get**

25 **is more like something you wouldn't expect a treatment**

Page 66

1 **if you are a human being. Sorry.**

2 Q. Can I ask you, were you taken to the induction wing, to

3 begin with?

4 **A. Just a minute, sorry.**

5 Q. Are you all right? Have some water.

6 THE CHAIR: Would you like to take a break? There is no

7 problem, if you want to.

8 **A. Can I?**

9 THE CHAIR: Of course. I will rise and we will return in

10 five minutes.

11 (12.17 pm)

12 (A short break)

13 (12.24 pm)

14 MR ALTMAN: Which wing did you go on to eventually?

15 **A. It was the induction wing.**

16 Q. So that was B wing?

17 **A. I believe.**

18 Q. How long were you on B wing?

19 **A. I think I was there for about a week.**

20 Q. How did you find B wing? What were the other detained

21 men like on B wing? What were they doing? What kind of

22 lives did they lead while they were on B wing?

23 **A. I think B wing was more different from the other wings**

24 **because it's kind of the new people coming in. It's**

25 **a bit -- much calmer.**

Page 67

1 Q. Were there other people on B wing who had been there

2 a long time, though? Apart from inductees like you,

3 were there other people on B wing, do you remember, when

4 you were there?

5 **A. Yes, I remember very well, because the person who was my**

6 **cellmate then, I think he was a Moroccan, or something**

7 **like that, some of the conversations I had with him, he**

8 **said he had been there for about three months, yeah.**

9 Q. Was he the one who was a smoker, or was there another --

10 **A. Yes, he was the one who was a smoker and would also burn**

11 **some frankincense in the room.**

12 Q. I think you found being with a smoker difficult?

13 **A. Yes, I don't smoke, which I let the nurse know when**

14 **I first came in, that I don't smoke.**

15 Q. On B wing, was there a smell of drugs around?

16 **A. On B wing?**

17 Q. Or was it on another wing that you're talking about?

18 **A. On B wing, I can't remember smelling that.**

19 Q. What about -- you were moved to A wing, weren't you?

20 **A. Then, after about a week, I was later moved to the**

21 **A wing.**

22 Q. Did you smell drugs on A wing?

23 **A. Oh, that is a -- that is a normal -- okay, smelling,**

24 **it's -- I think the drug -- it kind of depends on the**

25 **drug that was rampant there. It was more of a spice.**

Page 68

17 (Pages 65 to 68)

1 **But once in a while you have marijuana, you can smell**
2 **that once in a while.**
3 Q. We know about the spice use that there was at
4 Brook House. Was there any secret about the fact that
5 certain detained men were using spice?
6 **A. No. That was -- you tend to -- at some point, you tend**
7 **to know the guys and the people -- even the room that it**
8 **tends to concentrate the most, where at times you walk**
9 **by, you can see guys just already high on spice, piled**
10 **on each other in the room like zombies. Yeah, it's --**
11 Q. This was something -- if you could see it, presumably
12 the members of -- the staff members could see it who
13 were on the wings?
14 **A. Yes, definitely, everyone could see it, and it's**
15 **shocking and it's something -- something that affects me**
16 **generally, seeing things like that.**
17 Q. Of course.
18 **A. Yeah.**
19 Q. Let me ask you something about the cell that you were
20 in, as it's sometimes called, or people called them
21 a room. Did you regard it as a room or a cell?
22 **A. It's a cell. I'm sorry, I just need to make that point.**
23 **It's probably called a room, but I think using the word**
24 **"room" makes it hard for people who haven't experienced**
25 **it to actually have a good understanding of what it's**

Page 69

1 **like. It's a cell. That is just what it is.**
2 Q. You mean like a prison cell?
3 **A. Like a prison -- it is basically a prison cell. That's**
4 **just what it is.**
5 Q. What about -- was there privacy in the -- in that cell
6 when you shared it with another person?
7 **A. Well, I don't know.**
8 Q. We have heard about the toilet, and we have heard about,
9 you know, the curtain that could be used. But tell us
10 in your own words about the smells and the noises in the
11 room and the lack of privacy?
12 **A. I don't think the word "privacy" really exists there.**
13 **You might have been able to see in some videos what the**
14 **settings of the cell was. If you're lucky, you have**
15 **a curtain in your room. I remember in my cell, for**
16 **about half of my time there, there was no curtain.**
17 Q. Do you mean a curtain across the toilet?
18 **A. Across the toilet. There was no curtain. I think it**
19 **was -- at some point D390 had to find a way to get**
20 **a curtain into the room and put it there. Even when we**
21 **were lucky to find one, it wasn't really staying. So we**
22 **got to a point where we had to make the decision that,**
23 **when we use the toilet, we don't use it while we are**
24 **locked in, and we are locked in several times throughout**
25 **the day and throughout the night. But before we got the**

Page 70

1 **curtain, I would have -- I remember my bed was on this**
2 **angle and from my bed I can easily see the toilet**
3 **directly. Most of the time, I can see my -- I can see**
4 **my cellmate using the toilet.**
5 Q. Presumably, not to perhaps go into too much detail and
6 description, on top of that, you have noises and smells?
7 **A. Yes.**
8 Q. Was the room ventilated?
9 **A. No. All I know was something like an opening of a fan,**
10 **which I think is only to blow the air into the cell.**
11 **Apart from that, there was nothing.**
12 Q. What about the toilet itself? Was it clean or dirty?
13 The sink, clean or dirty?
14 **A. No, it's not clean. It's like an old WC toilet with**
15 **plaques on it, brown and things like that.**
16 Q. So it was stained?
17 **A. Proper stained.**
18 Q. Did you have to clean your own room?
19 **A. Yeah, we -- yeah, that's what we are told.**
20 Q. Is that something you did?
21 **A. I would try. We tried our best to clean to what we can,**
22 **with what is provided.**
23 Q. What was provided? Was that enough? Did you have
24 cleaning products?
25 **A. Yeah, when they are available, you can get them. But**

Page 71

1 **when they are not, you just have to do with whatever is**
2 **available.**
3 Q. Let me ask you this: at night, when you were locked
4 in -- you've just mentioned being locked in. We
5 understand the lock-in times were between 9.00 pm and
6 8.00 am the next morning. What about you? Did you
7 sleep through it? Was it an easy place to sleep, to get
8 a restful night?
9 **A. One of the things I didn't really do while I was in**
10 **detention was sleeping. While I was in detention, I was**
11 **experiencing lots of headaches during that period.**
12 Q. Headaches?
13 **A. Headaches, which was a repeated occurrence. I didn't**
14 **really sleep much and, even if I'm lucky to sleep, I'm**
15 **only sleeping at around 4.00 or 5.00 in the morning**
16 **a few hours. So, no, it was not -- it was not enjoyable**
17 **at all.**
18 Q. You say in your statement that you felt levels of stress
19 and anxiety that you hadn't felt before.
20 **A. Yes.**
21 Q. Which is natural.
22 **A. I did. And probably then I didn't recognise that was**
23 **what it was because I've never experienced it before.**
24 **And it's hard when you are in the middle of -- everyone**
25 **around you are probably experiencing the same thing, and**

Page 72

18 (Pages 69 to 72)

<p>1 it's like that's the baseline of a normal lifestyle in 2 detention. You are all stressed, depressed, struggling 3 to find a way to get out of detention, but also being 4 reminded every day that you could be picked up and 5 thrown back to where you came from at any time. So, 6 yeah, it's a hard one.</p> <p>7 Q. Let me come back to something I asked you, by way of 8 introduction, about a little earlier --</p> <p>9 A. All right.</p> <p>10 Q. -- which was about, you know, the attitudes of staff, 11 and you deal with this in your statement from 12 paragraph 28 onwards through to 29, but just in summary, 13 please, did you feel respected by staff at all?</p> <p>14 A. No. That wasn't anything of such. But I think it's 15 hard when you have 100 people and you only have one 16 person that seems to be the okay one among them, it's 17 always hard to remember that. I think you just class 18 every one of them out, because there are still certain 19 particular staff that, even until today, I will still 20 always remember that was different, but overall, 21 95 per cent of staff, no, they weren't good and the 22 treatment was bad. They treat you like rubbish. And 23 you are reminded of that every day.</p> <p>24 Q. You say in your statement at paragraph 28 that they 25 treated you in a demeaning way, frequently using bad and</p> <p style="text-align: center;">Page 73</p>	<p>1 time, some generalised issues about complaints and 2 oversight, but let me ask you, given what you have just 3 said, did you ever make complaint to anyone about your 4 treatment?</p> <p>5 A. Written complaint, probably no, but verbal complaint, 6 yes.</p> <p>7 Q. So not in writing?</p> <p>8 A. Not in writing.</p> <p>9 Q. When you say "verbal", verbal to whom?</p> <p>10 A. Maybe going to the office of the staff, asking them -- 11 because I still remember -- the one I can remember very 12 well there was a situation whereby I needed the toilet 13 paper. I went down to the office --</p> <p>14 Q. Do you mean the wing office?</p> <p>15 A. The wing office, the wing office. I asked them if I can 16 get some toilet paper. And they told me there was none. 17 And I had to let them know I had to use the toilet right 18 then, I needed one. They said, "There is nothing I can 19 do. Fuck off". I remember -- I can't remember the 20 senior staff -- it was probably the manager, but he was 21 senior, I had to walk up to him and tell him I needed 22 the toilet paper, and "Can you please speak to someone 23 to go and help me get it?" He said, "Well, if they are 24 busy, they are busy, go around and go and lack in 25 another cell and ask for toilet from other detainee --</p> <p style="text-align: center;">Page 75</p>
<p>1 abusive language, and you said you couldn't pinpoint 2 exact instances because they were so commonplace and 3 that they would say things like, "Fuck off, I don't have 4 time for you", or, "Stop being an idiot"?</p> <p>5 A. Yes.</p> <p>6 Q. You remember being called a "moron". Are these the 7 sorts of experiences that you suffered throughout the 8 whole time you were there?</p> <p>9 A. Mmm, exactly. That was a common theme -- a common 10 language, when you -- maybe when you go to a staff and 11 ask for certain help, and, if you like, they can't help 12 you or they don't have time for you and you're being 13 persistent, the next word is, "Fuck off, don't be an 14 idiot, don't disturb me. If I have the time, I'll come 15 to you. If I can't, do whatever you want", just things 16 like that. And you know you're in detention with the 17 mentality that there is not -- you have no power. There 18 is nothing you can do. You have a feeling that the 19 people you might actually report them to are probably 20 even worse than they are. With time, you recognise, 21 you -- that realisation hits you and you realise, okay, 22 you've got no power here. You just have to live through 23 it and accept the reality.</p> <p>24 Q. As to which, let me ask you, did you ever make 25 complaints? We will come back to perhaps, if we have</p> <p style="text-align: center;">Page 74</p>	<p>1 toilet paper from other detainee". And there is also 2 a situation whereby you complain to them about wanting 3 to see an immigration officer and they would tell you, 4 there is nothing they can do, they are not Home Office, 5 they are just here to offer the detention centre, so 6 there is nothing they can do.</p> <p>7 So with time, when you keep doing that over and over 8 and over again, and no-one is listening, you just 9 know -- well, if you're actually saying it right to 10 their faces and they are not listening, it's just 11 a waste of time writing the paper.</p> <p>12 Q. Are you ever aware of Home Office staff being on the 13 premises at the centre -- Home Office staff?</p> <p>14 A. Oh, yeah, they're there, because they tend to call you 15 when they have got bad news for you.</p> <p>16 Q. Did you speak to any during your time there?</p> <p>17 A. Well, speaking to them would be at their own time if 18 they want to speak to you. It's not actually speaking, 19 it's more of handing you documents, reminding you -- 20 more like telling you, "Don't forget, we will be picking 21 you up one day". It's more of a reminder of who you are 22 and what your situation is.</p> <p>23 Q. As far as your situation goes, and I'm looking at your 24 paragraph 32, on 23 May 2017, were you made aware by way 25 of G4S officers that your name was on a flight and you</p> <p style="text-align: center;">Page 76</p>

1 were going to be removed? Were you aware of that? Do
 2 you remember it?
 3 **A. Officially, no, I was not made aware of that. I believe**
 4 **that day the news was going around that there was**
 5 **a chartered flight that was going to Nigeria that day.**
 6 **And because, being Nigerian, I was in talks with some**
 7 **other Nigerian detainees and there were some of them**
 8 **that were on that list. They had been informed. But**
 9 **I wasn't. And I knew I had been in detention for**
 10 **a while, there is a possibility that my name might be**
 11 **there. So I got concerned, and that was when I decided**
 12 **I should take a further step, so I spoke with one of**
 13 **the managers, which I think his name was Stuart.**
 14 Q. Stuart?
 15 **A. Yes.**
 16 Q. Was it Povy-Meier, or another Stuart?
 17 **A. He's --**
 18 Q. A big guy?
 19 **A. Yeah, to be -- I don't know. He is one of the officers**
 20 **that wear white and blue trousers.**
 21 Q. Yes, he's a manager?
 22 **A. Yes, he was a manager.**
 23 Q. But you knew him as "Stuart"?
 24 **A. As "Stuart", yes.**
 25 Q. That's as much as you knew?

Page 77

1 **A. Yes. He was the one I spoke with, and he tried his best**
 2 **and he said he doesn't know my -- he doesn't -- he**
 3 **doesn't think my name was there, but he said he would**
 4 **take me to his office. So he took me down to his office**
 5 **and showed me his computer and, as he was scrolling**
 6 **down, he saw my name on it. He said, "Oh, you're there**
 7 **on the reserve list". And I was like, "If I was there,**
 8 **why was I not informed?" I think that was --**
 9 Q. Were you aware of a record, which you saw perhaps
 10 afterwards, that a decision had been taken on 17 May to
 11 remove you on the flight of the 23rd -- just look at
 12 your paragraph 32, in italics -- and that the record
 13 said:
 14 "Flight booked for 23 May 2017 ... Authority to
 15 remove on the charter granted. No barriers outstanding
 16 to prevent removal. Subject to be given no further
 17 notice. The date of the charter should not be
 18 disclosed."
 19 Presumably, you weren't aware of that at the time
 20 but you became aware of it afterwards?
 21 **A. I think -- yes, I wasn't aware of this. I think it**
 22 **was -- I think that would be in relation to the charter**
 23 **on the 23rd.**
 24 Q. Yes, exactly.
 25 **A. So I was definitely not made aware of that.**

Page 78

1 Q. But on the next day, the 24th, did you submit your own
 2 application for judicial review?
 3 **A. That was after I found out --**
 4 Q. Yes.
 5 **A. -- about -- from Stuart.**
 6 Q. What happened? Did you get put on a flight?
 7 **A. No, I didn't. I didn't get put on the flight. The**
 8 **reason why, I didn't know, but I assume it was because**
 9 **of my -- I will have assumed maybe it was because of my**
 10 **judicial review application.**
 11 Q. Yes.
 12 **A. That's kind of what I have thought.**
 13 Q. What you did discover was -- I'm simply picking this up
 14 from your paragraph 33 -- that you -- you said on 26 May
 15 you received another set of removal directions for
 16 5 June. Is that correct? That's what you say in
 17 paragraph 33 on page 8. Do you see that? Three lines
 18 up from the bottom of the page:
 19 "... on 26 May ... I received another set of removal
 20 directions for 5 June ..."
 21 **A. Yes, I believe I did.**
 22 Q. It is 5 June that I want to come to, please, if I may.
 23 Because on that day, we know that there was a use of
 24 force, and in a while I'm going to ask you to look at
 25 some video footage. Not quite yet, because first I want

Page 79

1 to get your account of what you say happened.
 2 Now, you have read some documents, and let's put up
 3 on screen a use of force document, <CJS005624>, tab 3,
 4 chair. Perhaps we can expand the top half, please.
 5 This is not in relation to you. It is in relation to
 6 your cellmate, I think, at the time, D390. Was he also
 7 Nigerian, as this document suggests?
 8 **A. Yes, he was.**
 9 Q. The time use of force commenced, ten past five, 17:10,
 10 and completed is given as 17:10. The log number at the
 11 top right is 137/17. You will see, a third down -- do
 12 you see there is a box that says "Hand-held camcorder"
 13 and below that "Body-worn camera"? Both have got
 14 a circle around the word "yes". Do you see that?
 15 **A. Yes.**
 16 Q. So we know that -- we know, certainly, that there was
 17 camera footage, body-worn camera, because we are going
 18 to see it, which was provided a couple of days ago.
 19 During the course of that use of force, what I want
 20 from you, please -- forget the document for now -- and
 21 you deal with it in paragraphs 34 and onwards, is what
 22 you say happened. What do you remember? 390 -- not
 23 you, but 390, this is 5 June -- was to be moved
 24 somewhere else?
 25 **A. According to what I remember and was told by D390 then,**

Page 80

20 (Pages 77 to 80)

<p>1 that was my understanding.</p> <p>2 Q. He wasn't being -- was he -- he wasn't being removed</p> <p>3 from the country, is that it? He was being removed to</p> <p>4 another centre?</p> <p>5 A. That's what I understand.</p> <p>6 Q. As far as you're concerned, given what we just looked at</p> <p>7 in your statement, did you believe on that day that you</p> <p>8 were going to be put on a flight, or did you know by</p> <p>9 5 June or did you believe that you weren't going to be</p> <p>10 put on a flight on 5 June?</p> <p>11 A. It is really hard to say, because, like, it was going to</p> <p>12 happen in May, I was thinking I would be removed, and</p> <p>13 I wasn't. And in June there was a possibility of that.</p> <p>14 But I think, at that point, I was -- I was thinking more</p> <p>15 that that might not happen, because I remember my</p> <p>16 judicial review was already on and, at that point, it</p> <p>17 had been transferred to the High Court.</p> <p>18 Q. I see.</p> <p>19 A. And I think there is an order that has gone out. So in</p> <p>20 my thinking, I don't see that happening.</p> <p>21 Q. Right.</p> <p>22 A. But --</p> <p>23 Q. Okay.</p> <p>24 A. -- there are situations that has happened in the</p> <p>25 detention centre where some other people still got</p> <p style="text-align: center;">Page 81</p>	<p>1 what he was asking of you?</p> <p>2 A. He came by the door, I can remember very well, he asked</p> <p>3 me to come to the door and, in that process, he told me</p> <p>4 to stay by the door --</p> <p>5 Q. Stay by the door?</p> <p>6 A. Yes, stay by the door, and I remember telling him, "No,</p> <p>7 I won't stay by the door".</p> <p>8 Q. What were you worried about?</p> <p>9 A. Because he was speaking to me through the shaft, and</p> <p>10 I could see what was happening through the shaft.</p> <p>11 Q. Sorry, what's the word you're using, forgive me?</p> <p>12 A. Through the shaft, the little shaft through the door.</p> <p>13 Q. So there's a little window?</p> <p>14 A. Yes, a little window there.</p> <p>15 Q. Tell me this, while I've got it in mind. When you're</p> <p>16 speaking to Stuart, who is on the other side of the door</p> <p>17 and you're on the inside, were you aware that there were</p> <p>18 a number of other officers with riot gear on outside at</p> <p>19 that time?</p> <p>20 A. Yeah, exactly, I saw them all in their shield and their</p> <p>21 helmets.</p> <p>22 Q. So Stuart is asking you, what, to go away from the door?</p> <p>23 A. No, he asked me to come to the door.</p> <p>24 Q. Come to the door. What did he say to you at the door?</p> <p>25 A. He asked me to come to the door, asked me to stay by the</p> <p style="text-align: center;">Page 83</p>
<p>1 removed, even --</p> <p>2 Q. In spite of having judicial review proceedings pending?</p> <p>3 A. Yes, so those that were still there.</p> <p>4 Q. You're in the room with 390 and we know that some of</p> <p>5 the officers, if we were to read through this use of</p> <p>6 force form, were aware of the fact that 390 was boiling</p> <p>7 up a kettle; yes? Do you remember a kettle being</p> <p>8 boiled?</p> <p>9 A. Okay. My recollection, I can't remember a kettle being</p> <p>10 boiled.</p> <p>11 Q. Right.</p> <p>12 A. But if there is any chance that that happened, it would</p> <p>13 have probably been for someone making tea there between</p> <p>14 us. But in my recollection, it's not something I can</p> <p>15 remember.</p> <p>16 Q. Do you remember there being any water or puddles of</p> <p>17 water on the floor in or outside the cell?</p> <p>18 A. Definitely not, I can't remember anything of such.</p> <p>19 Q. We know that an officer came to the door and spoke to</p> <p>20 you. Now, what was that all about? Do you remember any</p> <p>21 of that?</p> <p>22 A. I think -- that was Stuart.</p> <p>23 Q. Yes, that's the manager, Stuart.</p> <p>24 A. Yes.</p> <p>25 Q. That's Stuart Povy-Meier, who is a DCM. Do you remember</p> <p style="text-align: center;">Page 82</p>	<p>1 door, and I think at some point he also told me to,</p> <p>2 yeah -- the part of the conversation I can remember was</p> <p>3 him asking me to come to the door, stay by the door.</p> <p>4 Q. And realising what was about to happen, did you want to</p> <p>5 stay by the door?</p> <p>6 A. Definitely not.</p> <p>7 Q. Because?</p> <p>8 A. Because I could see those people in riot gear, all</p> <p>9 armoured up, about to come in. In my understanding, if</p> <p>10 I was to stay by that door -- it is a hard metal door,</p> <p>11 and the door in my cell, if you open it backwards, it</p> <p>12 hits the wall, and I definitely won't be staying by that</p> <p>13 door, seeing five, six big men coming through the door.</p> <p>14 If they should push that door, it will be hitting my</p> <p>15 head, pinning me to the wall, getting injured in the</p> <p>16 process.</p> <p>17 And another thing -- there were a lot of reasons,</p> <p>18 not just that. I also didn't want to also leave that</p> <p>19 cell because the suitable crew has got a reputation.</p> <p>20 Q. Yes. What's the reputation?</p> <p>21 A. There was a situation whereby they have gone to</p> <p>22 forcefully remove people from their cell and maybe take</p> <p>23 them to self-isolation or in the process of removing</p> <p>24 them but later brought them back because they didn't end</p> <p>25 up putting them on the flight and, when those people</p> <p style="text-align: center;">Page 84</p>

1 come back, they tell us what happened, as to what they
 2 experienced, how they were treated bad. They were the
 3 most feared crew in the detention. And based on that
 4 knowledge I had, I didn't want to leave that cell
 5 because I already know what they are coming to do, and
 6 I wanted to be in the cell so I can witness what would
 7 happen.

8 Q. So Stuart says to you, "Stay by the door". Did you go
 9 back to your bed?

10 A. I told -- I remember telling Stuart that "I don't want
 11 to stay by the door" or "I don't want to come by the
 12 door. I will go to the bed and I will stay there and
 13 you can come in and do whatever you want to do". That
 14 was what I told him.

15 Q. Your cellmate, 390, you say you don't remember him
 16 boiling up a kettle. Was he standing or was he on his
 17 bed?

18 A. According to what I -- I can't really remember that very
 19 well, but it's -- I don't want to speculate, but it's --
 20 it's either of the two. But I think probably --
 21 probably he's standing, but I can't really remember
 22 precisely what that was.

23 Q. We have this use of force form document on screen. I'm
 24 not going to go through the individual sections of it.
 25 But you would have looked at this, and everybody has it

Page 85

1 available to them. When the officers made their report
 2 about what happened, they talk about a kettle being
 3 boiled by your cellmate and being worried about the
 4 boiling of a kettle, for obvious reasons, because they
 5 say it was being repeatedly boiled, not just once, but
 6 repeatedly, and they also mention in some instances that
 7 there was water on the floor, which indicates that the
 8 kettle had been boiling and water had spilled onto the
 9 cell floor.

10 Now, are they all wrong about that?

11 A. Well, I am pretty sure if something like that happened,
 12 I would remember. I can't remember any such thing
 13 happening with water on the floor, kettle boiling, or --
 14 no, I can't recollect anything of such.

15 Q. Now, at some point, the door bursts open. Before it
 16 did, or around the time it did, do you now have any
 17 recollection whether the power went off in your cell?

18 A. No, I can't remember that now, the power going off, no.

19 Q. Did you appreciate that, occasionally, the officers
 20 would turn off the power to a cell when they were making
 21 a restraint, as the one that was made on 5 June, in
 22 order to avoid a kettle being used, in circumstances
 23 where they feared boiling water might thrown at them?

24 A. I don't know of that.

25 Q. You didn't know that?

Page 86

1 A. No.

2 Q. Right. The door comes open. You're on your bed. You
 3 can't remember where 390 was. Describe to us, first of
 4 all, what happens to you?

5 A. After speaking to Stuart, I went back to my bed, lay
 6 down on my bed, exactly what I told him I would do and
 7 they could come in and do whatever they wanted to do.
 8 I remember they came in. I think there were about
 9 five to six officers came in and I think about three or
 10 four, I remember, went to D390's side. Okay, I think --
 11 okay, I think I can remember it. He was probably
 12 standing.

13 Q. What did they do to him? Let's focus on him to begin
 14 with.

15 A. They came in and I remember them holding their shield.

16 Q. They did what?

17 A. They came in and I remember them holding their shield
 18 and using it to push him to the bed. At that same time,
 19 on my side, there were two officers that came to my side
 20 as well.

21 Q. Pause there for a moment. Let's focus on 390. When the
 22 shield was used on him, was he being violent in any way?

23 A. Not that I can remember, no.

24 Q. Was he saying anything?

25 A. I think I heard him complaining of pain --

Page 87

1 Q. No, no, before the shield was used, did he say anything
 2 about whether he wanted to go or not?

3 A. Okay. I remember -- he didn't want to go.

4 Q. But did he say that?

5 A. To the officers?

6 Q. Yes.

7 A. I can't remember.

8 Q. If you look at paragraph 41 of your witness statement,
 9 let's see if this jogs your memory. Have you got it
 10 there? This statement was made on 19 November of this
 11 year?

12 A. Okay.

13 Q. "They held him against the bed with their shield and
 14 then held his arms behind his back. They pushed him on
 15 his front so he was facedown on the bed. He was
 16 screaming that he didn't want to go, but he wasn't being
 17 violent towards anyone."

18 A. Yes.

19 Q. Is that accurate, as you --

20 A. That would be accurate, because when they were -- they
 21 put him on the bed, and there was a lot of screaming
 22 going on. Like, he was in pain, "You're hurting me",
 23 and things like that. Part of the conversation was,
 24 "I don't want to go? I told you I have a bail hearing",
 25 and things like that, "Why are you moving me?". So

Page 88

22 (Pages 85 to 88)

<p>1 there was a lot of conversation going.</p> <p>2 Q. That's him. Let's leave him for the moment. What about</p> <p>3 you? What happened to you?</p> <p>4 A. So when they came in, the two officers came to my side</p> <p>5 and one of them decided to put their shield on me and</p> <p>6 I got really angry and agitated and told them, "Why are</p> <p>7 they doing that?".</p> <p>8 Q. Just so we can understand, did they actually put the</p> <p>9 shield on you?</p> <p>10 A. According to my memory and what I can remember.</p> <p>11 Q. And were you sitting on your bed at this time, or were</p> <p>12 you flat on your bed, lying on it?</p> <p>13 A. I was flat on my bed.</p> <p>14 Q. On your back or your front?</p> <p>15 A. On my back, and when they came in, the shield was put on</p> <p>16 me and I had to use my hand to push it back. In that</p> <p>17 process, I had to sit up and put my back on the wall,</p> <p>18 and that was what led to me screaming at them, "Why are</p> <p>19 they doing that?", and part of the conversation, they</p> <p>20 told me -- they told me that they were doing that to</p> <p>21 protect me, which ...</p> <p>22 Q. Were you refusing to leave the room at that time? Had</p> <p>23 you been asked to leave the room?</p> <p>24 A. The conversation I had with them, never understood them</p> <p>25 telling me to leave the room. What I understood with</p> <p style="text-align: center;">Page 89</p>	<p>1 A. Based on my experience, when that was done initially and</p> <p>2 I had to sit up and push it back, I think when I started</p> <p>3 complaining, "Why are you doing that? I told you I'm</p> <p>4 not disturbing what you are here to do. I'm just laying</p> <p>5 down here", they maybe they stepped back a little, but</p> <p>6 that doesn't mean they left me. They were still all</p> <p>7 over in my space, in my face.</p> <p>8 Q. In the document we have on screen, and, again, just in</p> <p>9 order to save time I'm not going to take you to it, but,</p> <p>10 at pages 15 to 16, Stuart Povy-Meier made a report, and</p> <p>11 in his report he said no force was used on you and you</p> <p>12 were calm afterwards. Do you think that's accurate?</p> <p>13 A. "Calm"?</p> <p>14 Q. Were you calm?</p> <p>15 A. No. Calm? No, I wasn't calm, because there were lots</p> <p>16 of emotions after that. I just felt like I was -- I'd</p> <p>17 just been assaulted, I was angry. I just experienced</p> <p>18 something I've never experienced before in my life, and</p> <p>19 I remember, after that happened, I think Stuart came</p> <p>20 back into the room and just spoke to me briefly, and</p> <p>21 I think I told him that, "Why would they have even come</p> <p>22 to my side at all and put the shield on me at all?"</p> <p>23 I wasn't happy at all. I wasn't, no. I just -- yeah,</p> <p>24 I was -- I don't know, I was just over everywhere at</p> <p>25 that point. And at the end, I was -- because after that</p> <p style="text-align: center;">Page 91</p>
<p>1 the conversation I had with them was me coming by the</p> <p>2 door, and them -- and seeing -- coming by the door -- my</p> <p>3 understanding was, they wanted me to come by the door so</p> <p>4 I wouldn't be in the area --</p> <p>5 Q. In the way?</p> <p>6 A. -- where -- in the way.</p> <p>7 Q. Yes.</p> <p>8 A. But that wouldn't be possible because the choice between</p> <p>9 me staying by the door and getting my head hit by</p> <p>10 a heavy metal door or me just going to my bed, sitting</p> <p>11 down there and not disturbing whatever they are doing.</p> <p>12 Q. You remember 390 being put in handcuffs. Do you</p> <p>13 remember that?</p> <p>14 A. I'm not sure of that.</p> <p>15 Q. We will see the footage.</p> <p>16 A. But it's a possibility, and the reason why I think so is</p> <p>17 because the way they were -- he's a fit guy, and because</p> <p>18 the way they were able to control -- I can't remember</p> <p>19 seeing a handcuff, but the way his hand was placed</p> <p>20 behind his back seems like -- to me, seems like the only</p> <p>21 way that could have happened might have been trying to</p> <p>22 handcuff. But that doesn't mean I remember seeing one.</p> <p>23 Q. That's fine. Once 390, D390, was out of the cell, did</p> <p>24 the officers who had you, as you recall it, pinned down</p> <p>25 or pinned to the wall, did they let you go?</p> <p style="text-align: center;">Page 90</p>	<p>1 happened, they locked me back in, and I was just alone</p> <p>2 in the cell for about another 20/25 minutes alone after</p> <p>3 that.</p> <p>4 Q. Let me ask you some questions that the Home Office would</p> <p>5 like me to ask you, and the chair has agreed to be</p> <p>6 asked. Did you sustain any physical injuries arising</p> <p>7 out of what happened to you in that cell that day?</p> <p>8 A. Nothing that I can remember.</p> <p>9 Q. Did you complain about that use of force to anyone?</p> <p>10 A. Right immediately. I probably explained to you the</p> <p>11 paper complaint just wasn't a way forward at the</p> <p>12 detention, but --</p> <p>13 Q. Did you complain verbally?</p> <p>14 A. Verbally, right immediately to Stuart, right there.</p> <p>15 Q. To Stuart?</p> <p>16 A. Right there.</p> <p>17 Q. To anyone else?</p> <p>18 A. To staff, no, but to other detainees after they opened</p> <p>19 us up, told them about what happened and what went down.</p> <p>20 Q. But not officially? No official complaint?</p> <p>21 A. Well, if the oral complaint to Stuart can be considered</p> <p>22 as an official one, that would be it.</p> <p>23 Q. What I am going to do now is, I'm going to play some</p> <p>24 body-worn camera footage to you.</p> <p>25 Chair, as you will recall, you made a ruling or</p> <p style="text-align: center;">Page 92</p>

<p>1 a determination that footage which might identify</p> <p>2 a detained person needs to be blurred, redacted and</p> <p>3 subtitled. That's not been able to happen yet, as far</p> <p>4 as this footage goes, because, as I have said before, we</p> <p>5 have only recently received it. So what I invite you to</p> <p>6 do, please, is for the broadcast to be cut so that the</p> <p>7 footage can be played in closed session. We have been</p> <p>8 in open session throughout, but that is a substantive</p> <p>9 change, for the footage to be shown in closed session.</p> <p>10 Once it is confirmed that the live stream has been cut,</p> <p>11 then I will ask for the first two minutes of the footage</p> <p>12 to be played to the witness and to people in the inquiry</p> <p>13 room?</p> <p>14 THE CHAIR: I agree to that. Do I need to rise for us to do</p> <p>15 that?</p> <p>16 MR ALTMAN: I don't think so. I just need an indication</p> <p>17 from the technicians that the broadcast has been cut.</p> <p>18 THE CHAIR: Okay. Thank you.</p> <p>19 MR ALTMAN: What I will do is, once that's happened, I will</p> <p>20 ask you some more questions.</p> <p>21 IN CLOSED SESSION</p> <p>22 MR ALTMAN: I wonder, Madam Evidence Handler, if you could</p> <p>23 put up on screen -- hopefully you have it -- UoF</p> <p>24 137.7(2).</p> <p>25 (Video played)</p> <p style="text-align: center;">Page 93</p>	<p>1 officers, what's going on, but do you think you see</p> <p>2 yourself being pinned down on the bed, as you've</p> <p>3 described to us there, or is it just too difficult to</p> <p>4 see?</p> <p>5 A. According to my own remembrance and what I remember --</p> <p>6 Q. It is not your memory I'm asking you. It's what you see</p> <p>7 on the video. Do you think it is just too difficult to</p> <p>8 see or do you see yourself in the video being pinned on</p> <p>9 the bed and then up against the wall, as you have told</p> <p>10 us?</p> <p>11 A. There is a session when they initially came in and</p> <p>12 I think one of the staff got their shield to me and</p> <p>13 I had to sit up and push it.</p> <p>14 Q. Do you think you see that on the video?</p> <p>15 A. I believe so.</p> <p>16 Q. Did you see any of the officers with batons? Do you</p> <p>17 know what a baton is?</p> <p>18 A. Yes.</p> <p>19 Q. It's like a stick. Did you see any of that, or anyone</p> <p>20 hitting D390 with a baton?</p> <p>21 A. I can't remember anything of such.</p> <p>22 Q. The reason I ask is, I want you to look at one document</p> <p>23 very briefly, please. Chair, for you at B/4, section 4,</p> <p>24 tab 4. D390, you will remember, made a witness</p> <p>25 statement in support of your case in the High Court. Do</p> <p style="text-align: center;">Page 95</p>
<p>1 MR ALTMAN: Can we take it down, please? That's enough for</p> <p>2 our purposes. Chair, I will wait for an indication,</p> <p>3 please, from the room, that the broadcast has resumed,</p> <p>4 and then I will ask some questions.</p> <p>5 IN OPEN SESSION</p> <p>6 MR ALTMAN: Now, you have seen that footage. You may have</p> <p>7 seen it before. First of all, the manager at the door,</p> <p>8 that's Stuart Povy-Meier; is that correct?</p> <p>9 A. Yes.</p> <p>10 Q. The one who is speaking to you through the door.</p> <p>11 A. Yes.</p> <p>12 Q. You will remember that he says, when he's at the door,</p> <p>13 something about boiling a kettle. Do you remember</p> <p>14 hearing that? That's what he says?</p> <p>15 A. No, I couldn't --</p> <p>16 Q. You don't remember hearing it? Do you remember him --</p> <p>17 hearing something about turning off the electricity?</p> <p>18 A. No, I didn't hear.</p> <p>19 Q. But you did notice that when the officers go in, the</p> <p>20 lights are off and then suddenly they come on again? Do</p> <p>21 you remember seeing that?</p> <p>22 A. No, I couldn't remember.</p> <p>23 Q. All right. It is difficult to see, isn't it, from the</p> <p>24 vantage point of whoever is holding the camera or</p> <p>25 whoever is wearing the camera, beyond the bodies of</p> <p style="text-align: center;">Page 94</p>	<p>1 you remember that?</p> <p>2 A. Yes, I believe he supplied an unsigned statement.</p> <p>3 Q. It may be an unsigned one. Let's put it up on screen.</p> <p>4 <DL0000095> at page 1 to begin with. There's the front</p> <p>5 of the statement. You can see the title. It's in the</p> <p>6 High Court of Justice, Queen's Bench Division,</p> <p>7 Administrative Court, the Queen on the application of</p> <p>8 you and the Secretary of State. It's the statement of</p> <p>9 your erstwhile cellmate, D390. Can we go to the next</p> <p>10 page, please. If we focus on paragraph 7 for a moment,</p> <p>11 I'm asking these questions on behalf of the Home Office:</p> <p>12 "The guards proceeded to hit me ..."</p> <p>13 This is what D390 says:</p> <p>14 "... with their batons and their shields. I was</p> <p>15 screaming asking them to leave me alone."</p> <p>16 What I'm asking you -- that's the reason I've asked</p> <p>17 you whether you saw batons being used, whether he's</p> <p>18 right or wrong?</p> <p>19 A. I can't remember that happening because, at some point</p> <p>20 during the altercation, my view was restricted because</p> <p>21 of the two staff that were beside me. But based on what</p> <p>22 I saw when my view was able to see, I couldn't see</p> <p>23 a baton being used or any baton.</p> <p>24 Q. Can we also look at paragraph 6 of the same statement,</p> <p>25 this on behalf of G4S who asked the question, I think,</p> <p style="text-align: center;">Page 96</p>

<p>1 or is it the Home Office? The Home Office, forgive me.</p> <p>2 There D390 says:</p> <p>3 "I noticed they had also pinned down D1851 [so</p> <p>4 that's you] to his bed. I could hear him screaming. He</p> <p>5 kept shouting at them to leave him alone. They just</p> <p>6 ignored him and carried on trying to remove me [in other</p> <p>7 words, D390] from the cell."</p> <p>8 Was that accurate, as far as you were concerned,</p> <p>9 what 390 was saying about you?</p> <p>10 A. Well, I don't know what his view was when that was</p> <p>11 happening, but he -- there's a possibility -- I don't</p> <p>12 know, but there's a possibility he might have seen the</p> <p>13 initial time when one of the officers -- when they first</p> <p>14 came in and put -- bent the shield on me and I had to</p> <p>15 sit up and push it off. It's a possibility.</p> <p>16 Q. You see, the suggestion is, as I have understood it,</p> <p>17 that the claim made in support of your case was not</p> <p>18 a true claim. Do you understand what's being suggested?</p> <p>19 A. Well, I can only -- to be honest, I can only tell what</p> <p>20 I experienced, what my view was, what -- the way I felt</p> <p>21 and the impact of what the experience was for me, and</p> <p>22 it's hard for me to explain what D390's view of</p> <p>23 the situation was.</p> <p>24 Q. Let me ask you this: having seen the video footage, is</p> <p>25 there anything you feel that you should change about the</p> <p style="text-align: center;">Page 97</p>	<p>1 A. That didn't really need reporting.</p> <p>2 Q. Because everybody knew?</p> <p>3 A. Because the staff see it everyday. They know the rooms.</p> <p>4 That doesn't really need reporting.</p> <p>5 Q. G4S asked me to ask you the questions about whether you</p> <p>6 complained about those other issues that you had. Can</p> <p>7 we look at it another way? If you had complained about</p> <p>8 other detained men, perhaps some of whom had criminal</p> <p>9 convictions, would that have made your life simpler in</p> <p>10 detention or worse? If they had been reported and</p> <p>11 something had happened to them and they knew it was you</p> <p>12 who had reported them, what would have happened?</p> <p>13 A. Okay. In detention, we're being detained with convicts,</p> <p>14 hardened criminals. I've never been in that line of</p> <p>15 life before. I've never experienced it before. Never</p> <p>16 had any altercation with police ever before in my life.</p> <p>17 I've heard stories of some ex-convict who was being</p> <p>18 detained there, who was -- got sent into prison for</p> <p>19 cutting off someone's head. And now I'm being</p> <p>20 threatened by someone -- being told by someone who told</p> <p>21 me, "I will cut off your head", using, even, hand.</p> <p>22 I will -- and I know the majority of the time there are</p> <p>23 not a lot of staff on the wing. If you try to get,</p> <p>24 even, attention of staff, they don't care. If he's</p> <p>25 saying that, what about if he's capable of doing it?</p> <p style="text-align: center;">Page 99</p>
<p>1 account you have given to the inquiry about your</p> <p>2 experience of what happened? Is there anything you want</p> <p>3 to change?</p> <p>4 A. There's definitely -- my experience has been what my</p> <p>5 experience is, and there is nothing I see that needs</p> <p>6 changing.</p> <p>7 Q. Let me please then move on. Because in your inquiry</p> <p>8 statement, you then deal with some aspects about your</p> <p>9 experience of other detained men at Brook House,</p> <p>10 paragraph 52 and onwards. Simply this: you talk about</p> <p>11 occasions when there were other threatening detained men</p> <p>12 at Brook House, one of whom, for example, made threats</p> <p>13 over a pool game; there was an issue you had over food.</p> <p>14 I simply want to ask you this: did you complain about</p> <p>15 those problems to anyone, and, if not, why not?</p> <p>16 A. I didn't complain because -- while you're in</p> <p>17 Brook House, you -- you have to be able to understand</p> <p>18 the environment you're in. You just -- you tend to</p> <p>19 understand that no-one will listen to you, because, in</p> <p>20 reality, no-one cares about what is happening to you --</p> <p>21 not the Home Office, not the majority of the officers.</p> <p>22 So the best thing is, when things like that happen, is</p> <p>23 try your best to avoid such situations, really.</p> <p>24 Q. The same thing, if you saw drug use, did you ever think</p> <p>25 of reporting that to anyone?</p> <p style="text-align: center;">Page 98</p>	<p>1 Why will I want to complain because I'm afraid for my</p> <p>2 life. Is better you just shut up, because if</p> <p>3 I complain, in my understanding, if you make complaint</p> <p>4 and they listen, which in my experience no complaint,</p> <p>5 even through verbal, has ever -- anything has been done</p> <p>6 about it, but if they ever did, they will have to get</p> <p>7 the person involved. And according to information that</p> <p>8 goes around about some of them, you don't want to have</p> <p>9 any bad stuff with people like that. You don't.</p> <p>10 Q. No, I understand. Thank you. Coming back to one or two</p> <p>11 other questions about the environment. I've asked you</p> <p>12 about the cell and the smell and the noises, and you've</p> <p>13 told us very graphically about all of that. One of</p> <p>14 the other things I want to ask you about, communal</p> <p>15 showers which are on the wing. Did that feel private</p> <p>16 when you took showers?</p> <p>17 A. Well, I don't think so -- well, if being in the shower</p> <p>18 and the water of the shower -- the shower water of</p> <p>19 the person next to you, even if there is a partition, if</p> <p>20 the shower water of the person next to you is splashing</p> <p>21 on you, if that is called private in G4S settings, maybe</p> <p>22 it is private. But in my own understanding, that's not.</p> <p>23 It's just not. It's just a thing. You're sharing,</p> <p>24 I think, probably eight showers or something, or more</p> <p>25 than that, I can't remember, with other -- probably more</p> <p style="text-align: center;">Page 100</p>

25 (Pages 97 to 100)

<p>1 than 40 other detainees.</p> <p>2 Q. So you found showering in communal showers also lacking</p> <p>3 in privacy?</p> <p>4 A. Yes, and the hygiene in there isn't really the best.</p> <p>5 It's -- no, it's no good. It's not clean. Because it</p> <p>6 is generally left to some detainees to clean it that</p> <p>7 gets work in the detention centre, with majority of them</p> <p>8 do it so that they could stay out longer by avoiding</p> <p>9 being locked up for longer hours. And they just -- no,</p> <p>10 it's not really hygienic, to be honest. Some of them</p> <p>11 are even clogged, at times water doesn't float through,</p> <p>12 you get into the shower, you're stepping into settled</p> <p>13 water that has been used by the previous person that was</p> <p>14 in there.</p> <p>15 Q. Let me ask you this, just as a question, really, which</p> <p>16 just globalises, if I may, your view of the situation in</p> <p>17 which you found yourself in Brook House. You made</p> <p>18 another witness statement in January 2020. Chair, you</p> <p>19 will find this behind tab 2. Can we just put up,</p> <p>20 please, the following document and the page of that</p> <p>21 document, <DL0000094> at page 12. If we can expand the</p> <p>22 bottom half, paragraph 74. These are your words, made</p> <p>23 for the purposes, I imagine, of your civil complaint:</p> <p>24 "It was mentally draining trying to just get on with</p> <p>25 my life whilst in Brook House. I was constantly tired,</p> <p style="text-align: center;">Page 101</p>	<p>1 Others would scream about killing themselves and you</p> <p>2 would hear others self-harming. It was also not</p> <p>3 uncommon to see people wetting themselves, collapsing</p> <p>4 and frothing at the mouth because of spice. The</p> <p>5 detention centre smelled of spice. Brook House has</p> <p>6 damaged me mentally and physically."</p> <p>7 That sums up your experience in one paragraph?</p> <p>8 A. Yeah, some of the experience, but not really tell the</p> <p>9 mental effect it all had, because it's easy to say what</p> <p>10 you saw, what you experienced, but I think for me, as</p> <p>11 someone who has never been in such a situation of such</p> <p>12 ever in my life, it totally made me someone else until</p> <p>13 today, and I'm still struggling, and the pain was --</p> <p>14 I shouldn't have been there. There were several chances</p> <p>15 to avoid me staying there for long or even getting</p> <p>16 there. I tried everything. Everything they asked me,</p> <p>17 I provided, but they never listened. They didn't do</p> <p>18 anything. Even until today, they still haven't</p> <p>19 apologised. They said they accepted that I was detained</p> <p>20 unlawfully, but no apology even until today, and I just</p> <p>21 ask myself the question, I came from a country whereby</p> <p>22 they tell you the law doesn't care, whatever, I came to</p> <p>23 the UK believing there is a law. Okay, people make</p> <p>24 mistakes, but there is a law that will protect you, no</p> <p>25 matter what. Until today, my view has changed. I just</p> <p style="text-align: center;">Page 103</p>
<p>1 always stressed and crying frequently. I was always on</p> <p>2 edge and I lost count of the sleepless nights I had.</p> <p>3 The food was poor, and I was locked up for majority of</p> <p>4 the day. My freedom, even within the context of</p> <p>5 a detention centre, was non-existent. The immigration</p> <p>6 officers simply were not concerned with the safeguarding</p> <p>7 of my welfare or safety. The immigration officers were</p> <p>8 demeaning and rude. They spoke to me with utter disdain</p> <p>9 and disrespect. The drugs and gang culture also did not</p> <p>10 help. No assessments seem to have been carried out as</p> <p>11 gang members would find themselves in close quarters to</p> <p>12 fellow gang members, rival gang members or people not</p> <p>13 associated with criminality. I shared a cell with</p> <p>14 a criminal D390 ... Again, I am a law-abiding person,</p> <p>15 I don't know any criminals. I don't know anyone within</p> <p>16 my immediate family, extended family or friends with</p> <p>17 criminal convictions. This was a completely different</p> <p>18 world to anything I had experienced and I hated it. It</p> <p>19 continues to affect me to this day. I was under</p> <p>20 constant stress and anxiety. The fact that we would</p> <p>21 hear people screaming in the detention centre was also</p> <p>22 very stressful. It could be the middle of the night and</p> <p>23 we would hear people banging on the heavy metal doors</p> <p>24 and they would be reciting religious scriptures and</p> <p>25 shouting. Your sleep would be interrupted without fail.</p> <p style="text-align: center;">Page 102</p>	<p>1 don't think it exists. And -- yeah, the story is there,</p> <p>2 what I experienced, what I saw everyday, the spice,</p> <p>3 drugs, people collapsing, emergencies, people looking</p> <p>4 like zombies every day, piling on each other. Even when</p> <p>5 I was in the real world, I didn't see that, but seeing</p> <p>6 that every day, for God's sake, it shapes you. I don't</p> <p>7 pray anyone experiences it, and part of the reason why</p> <p>8 I came into this inquiry is to please do something about</p> <p>9 it. There are probably still other people experiencing</p> <p>10 the same thing, especially innocent people, where you're</p> <p>11 in detention whereby convicted people came there and</p> <p>12 they are telling you that their experience in the prison</p> <p>13 that they came from is better than their experience in</p> <p>14 the detention centre. That will probably give you an</p> <p>15 idea of what it is like.</p> <p>16 Q. Let me just ask you a couple of other things, and then</p> <p>17 we will try to finish in the next 15 minutes or so.</p> <p>18 First of all, in a word or two, you deal with this</p> <p>19 at length in your witness statement, but in a word or</p> <p>20 two, did you find, when you needed it, access to</p> <p>21 healthcare easy at Brook House or did you find waiting</p> <p>22 times intolerable?</p> <p>23 A. It wasn't easy because my -- I still remember one</p> <p>24 particular experience. If I remember, I was having the</p> <p>25 flu at some point and I needed to see a healthcare</p> <p style="text-align: center;">Page 104</p>

26 (Pages 101 to 104)

1 official. How to -- when you put a request to see
 2 a nurse or something, the earliest they probably respond
 3 to you is, in my own experience, probably two days
 4 after. In my case, I think it was maybe three or four
 5 days after. And even when they finally saw me,
 6 I remember asking them -- telling them what's the issue,
 7 that I'm struggling with breathing because of the flu,
 8 it was really bad, and the nurse told me there is
 9 nothing -- they have got nothing they can give to me,
 10 that I should go back to the wing and ask for
 11 paracetamol in the wing office, and I told them that,
 12 "Well, don't they have any nasal spray that they should
 13 just give that out? That generally helps me", she said
 14 they don't have. I even told them, "Okay, no problem.
 15 Can you help me get it? I will pay for it myself. If
 16 you don't have it, I'm willing to pay for it". She said
 17 there is nothing they can do. I'm like, "Okay, just
 18 help, because it's affecting me". Nothing happened.
 19 And I just went back and that was it.

20 That's just not the only story. Because of
 21 the headache I was experiencing every night, every day,
 22 I had to rely most of the time on paracetamol. That is,
 23 if they give it to you. Because there are times you
 24 will call and ask for paracetamol and no staff will
 25 respond to you. You will ring emergency bell, you can

Page 105

1 hear the emergency bell ringing, but no staff answering
 2 you. And the emergency bell is that loud -- because
 3 I remember my floor was on the top floor and the wing
 4 office was downstairs. And it's that loud, I could hear
 5 it behind the door I was locked in on the top floor. So
 6 there is no way any staff who'd be in that office, or
 7 even sleeping, that that person wouldn't wake up. So
 8 it's either there is no staff there or the staff there
 9 is dead. It's either that or the other.

10 Q. If it was a serious emergency, what then?

11 A. Oh, that happened several times. That's -- not me, but,
 12 like, an example of some detainee banging on the door.
 13 That was some situation, that was as a result of some
 14 detainee actually screaming they need help. Because
 15 I still remember an experience where a detainee was
 16 banging on the door in the middle of the night and
 17 saying his cellmate needs help, was banging, ringing,
 18 banging, so hard, nothing happened. There was no
 19 response. So that's not just once.

20 Q. Let me ask you about something else then. You have told
 21 us that around the time of the first -- when you caught
 22 wind of the fact that you might be removed, you
 23 judicially reviewed the decision and, by the sound it,
 24 you were doing that by yourself at that point. Did you
 25 find the use of machines, photocopiers, the internet,

Page 106

1 that sort of thing, within the centre, easy in order to
 2 pursue a legal claim which, as it turned out, was
 3 completely justified?

4 A. I think it's good to say Brook House was like a place
 5 that was set up to keep you in as long as possible.
 6 That was the way it felt. And I believe to a lot of
 7 detainees as well, in any way. I can still remember
 8 probably I was there for almost three months, and very
 9 well I can remember, for half of it, there was no access
 10 to internet. Internet was down. And I remember the
 11 reason -- some of my legal process in the court, there
 12 was a point whereby I got contact from the Home Office
 13 and I was told a sealed copy of my judicial review, they
 14 didn't receive it, that I didn't send. That was because
 15 I couldn't. The fax machine wasn't working. I couldn't
 16 scan it because there was no internet working. The only
 17 means I had of getting it across to them was using the
 18 welfare office, the staff, where they only had one or
 19 two staff, at times, attending to the -- over,
 20 I think -- I don't know the total number, but all the
 21 detainees in the whole detention centre. And I remember
 22 it was after three or four days later that the judicial
 23 review had been sealed by the court, that I was finally
 24 able to get it across to the Home Office, and that was
 25 after me having to queue by the welfare door, and you

Page 107

1 would be given a number. You could be given number 50,
 2 and the majority of the time, the welfare staff, they
 3 are just one or two. They can only attend to maybe just
 4 30 people in a day. So when that happened, you have to
 5 go back the following day, wake up as early as possible.
 6 By the time you get there, you probably already have
 7 40 people ahead of you. If you're lucky enough, it will
 8 be your turn that day. If it's not your turn, you have
 9 to come back again.

10 With time, you realise you can't use the internet,
 11 the internet is down, but their own internet is working
 12 in the office. So why is theirs working and yours, the
 13 one for the detainees, is not working?

14 Q. One of the things you say in your statement at
 15 paragraph 100 is that the internet was difficult to
 16 access and it wouldn't work when there was to be
 17 a removal. You have said that you didn't know whether
 18 that was deliberate or not or whether that was just
 19 unreliable, but what was the word on that? What did
 20 people think?

21 A. Yes, it seems at times that there's coincidence and it
 22 seems to be it's deliberate as well. But when something
 23 tends to happen often and you can see a pattern, you
 24 start asking yourself, "Is this deliberate?", because
 25 during the period when there is about to be a removal or

Page 108

27 (Pages 105 to 108)

<p>1 deportation, people tend to run around and try and start 2 some -- bring some legal case into the court with the 3 hope that their case will be reviewed and deportation 4 might be stopped and all of that. But the only way 5 people could actually do that will be if they could send 6 documents to their counsel, the court or whoever. If 7 that is not possible, well, they will be removed. They 8 can't stop anything. But that tends to -- in my 9 recollection, that seems to be something that happened 10 often around those periods, and an example of it was 11 mine. It was during the period I knew I was -- I might 12 be removed on 25 May that I started my judicial review. 13 It was after, like, four days or five days, I was able 14 to get it across to them. That was because the 15 internet, the fax machine, was down. So it wasn't just 16 me. That seems to be -- I don't know if it was 17 deliberate, but it's hard to convince yourself it's not, 18 with the frequency it happened.</p> <p>19 Q. I said a little earlier I might come back to complaints 20 and oversight. You were asked, for the purposes of your 21 inquiry statement, whether you'd heard of various 22 organisations like the Professional Standards Unit or 23 the IMB, the Independent Monitoring Board. Had you? 24 Just yes or no -- 25 A. Not really, no.</p> <p style="text-align: center;">Page 109</p>	<p>1 Then paragraph 47 at the bottom, please: 2 "... told me that he experiences negative intrusive 3 thoughts on a regular basis, 'daily'. He said that he 4 still has nightmares but he cannot remember what the 5 content of the nightmares is. He said that he wakes up 6 sweating and this happens about two to three times 7 a week." 8 And over to the next page, please, and just let me 9 read out a few more paragraphs. At the top, 48, 49, 50 10 and then 51 is what we will read. Let's start with 48 11 to 50: 12 "He told me that he experiences flashbacks usually 13 when he sees triggers that remind him of his time in 14 detention such as the cells, violence, sounds of keys or 15 TV programmes related to prison. He said that he does 16 not just have ordinary flashbacks. He said that when he 17 experiences flashbacks, he 'literally breaks down'. He 18 said that he cries, his mood changes and he finds it 19 very difficult to control his emotions. 20 "He said that his appetite is not like it was 21 before. He said that he has lost a lot of weight ..." 22 You said to the psychologist "It has taken a lot out 23 of me". You used to be a gym addict but you now feel 24 anxious about gyms because you associate it with 25 detention and you now felt disgusted going to the gym</p> <p style="text-align: center;">Page 111</p>
<p>1 Q. There were others that you were asked about. You said 2 you'd heard of the Prisons and Probation Ombudsman since 3 release and you had heard of the Gatwick Detainees 4 Welfare Group, but you didn't understand what they were 5 for. You were aware of the chaplaincy and you went to 6 some church services, but you never sought help from 7 them. Is that right? That's what you said. And you 8 told us about your view of making complaints. 9 Finally, what I would like to do, please, is to come 10 on to something really we started with, which is the 11 impact of detention on your health. I am going to ask 12 to put up on screen, please, <DL0000099> at page 7. 13 Chair, tab 10. This is a psychological report by 14 Dr Rozmin Halari. On page -- I said 7, I meant probably 15 9, in fact. Forgive me. It starts at page 9. That's 16 my fault again. I'm looking at three different page 17 numbers on the same page. I meant 7. Can we go back 18 two pages, please. Paragraph 45 at the bottom, "Mental 19 and physical health". Let's just look at what the 20 psychologist had to say about you, and this report is 21 dated 30 April 2018: 22 "... [no] physical health difficulties. He said 23 that he suffers from depression and anxiety and he has 24 been diagnosed with PTSD which was diagnosed by the GP 25 in September/October 2017."</p> <p style="text-align: center;">Page 110</p>	<p>1 and you couldn't see the benefit for yourself and you 2 had lost motivation. 3 Paragraph 50. At the time of this report, hardly 4 went out. You said in that particular week you went out 5 on two occasions -- once in order to send a parcel and 6 the other to attend the assessment with the 7 psychologist. 8 Finally, paragraph 51. You said that when you hear 9 a loud bang, you get very anxious and you jump. In 10 detention when, as you put it, "I was banged up", it was 11 really distressing and traumatic. You became tearful in 12 the assessment, you went quiet, stating that when the 13 doors locked, you heard the others locking from far away 14 and it was a reminder that you were going to have to be 15 banged up. There was no air, no sign of life, you felt 16 trapped, very trapped and anxious, and you said that you 17 experienced constant uncertainty because you didn't know 18 what each day was going to be like or what was going to 19 happen. You said that words can't describe what you 20 went through. It was just horrible. 21 Are you better than that now? That was April 2018. 22 We are now in December 2021. Or is that still your 23 life? 24 A. Well, I want to believe I'm better than back then, 25 because -- it was horrible back then, because I was kind</p> <p style="text-align: center;">Page 112</p>

<p>1 of -- probably two months or three after I came out.</p> <p>2 And it was hard because I remember then I was home and</p> <p>3 I think it's easy -- it's easy to explain because, when</p> <p>4 I left detention, like I said, I didn't actually</p> <p>5 understand what was happening to me, why I was in</p> <p>6 Brook House. It was after I was released. As I stepped</p> <p>7 out into the real world, I remember my first step was</p> <p>8 stepping into Gatwick train station. That was where</p> <p>9 I first noticed something is different because people</p> <p>10 were walking by me and I was scared. I got startled</p> <p>11 when people walked by. And that felt weird. But I just</p> <p>12 thought, well, let me just go back. I was just excited</p> <p>13 to be out of the place. But after I got home,</p> <p>14 I realised everything was different. I didn't want to</p> <p>15 leave the same spot I was. I didn't want to -- wouldn't</p> <p>16 go out of the house. Just spoke with friends. If they</p> <p>17 invited me out, I wouldn't go. The worst part was</p> <p>18 hearing a bang and me jumping. It happened for several</p> <p>19 times, and I remember -- another one I remember was</p> <p>20 being at home and watching a programme on TV, it was</p> <p>21 about life in prison or something like that. And,</p> <p>22 funnily enough, the programme was just a remembrance</p> <p>23 of -- was just there remembering me that where I was was</p> <p>24 a prison. First, I remember seeing the plates they were</p> <p>25 using. It was a normal prison. The plates they were</p> <p style="text-align: right;">Page 113</p>	<p>1 Chair, those are all the questions I have. I don't</p> <p>2 know if you have any questions for the witness?</p> <p>3 THE CHAIR: I don't, but I would just like to thank you as</p> <p>4 well. I know it is not an easy experience and I have</p> <p>5 very much appreciated hearing your account, so thank</p> <p>6 you.</p> <p>7 A. Thank you.</p> <p>8 (The witness withdrew)</p> <p>9 MR ALTMAN: Chair, thank you very much. That's all the</p> <p>10 business for today. We resume on Monday at 10 o'clock.</p> <p>11 We have another detained man coming to give evidence,</p> <p>12 D668, at 10 o'clock on Monday, all things being well,</p> <p>13 followed by other evidence from other witnesses who are</p> <p>14 in the timetable, together with NGO evidence, which will</p> <p>15 consume us next week.</p> <p>16 THE CHAIR: Thank you very much. See you on Monday.</p> <p>17 (1.43 pm)</p> <p>18 (The hearing was adjourned to</p> <p>19 Monday, 6 December 2021 at 10.00 am)</p> <p>20</p> <p>21</p> <p>22 I N D E X</p> <p>23</p> <p>24 WITNESS D1618 (sworn)1</p> <p>25</p> <p style="text-align: right;">Page 115</p>
<p>1 using, it was the same type of plate as the plastic</p> <p>2 plates we used to eat in, in Brook House. The ketchup</p> <p>3 they used, exactly the same. I broke down. I broke</p> <p>4 down. It was terrible.</p> <p>5 I think it was that day I realised I need to go and</p> <p>6 see an expert because -- my partner was there, was</p> <p>7 supportive, but I think she was scared and she realised,</p> <p>8 "Oh, this is bad", and, yeah, since then, I've sought</p> <p>9 help, was able to get some therapy that I was able to</p> <p>10 get through the NHS, but financially I couldn't,</p> <p>11 because, even after coming out of detention for years,</p> <p>12 I still -- Home Office still wouldn't allow me to work.</p> <p>13 For years, even after I was released from detention. So</p> <p>14 there wasn't any money to go and seek any help.</p> <p>15 But during that process, I was taught how to try and</p> <p>16 cope with it. It's still there. It's still there. But</p> <p>17 I think now I'm more -- much more equipped to know how</p> <p>18 to deal with it. It's not like I've gotten to where</p> <p>19 I want to be, I think I still need more help, but it's</p> <p>20 much more better. Before, I actually -- I can actually</p> <p>21 talk about where I am now, so I think that's an</p> <p>22 improvement.</p> <p>23 MR ALTMAN: Good. Thank you very much. Thank you very much</p> <p>24 for coming. Thank you very much for giving your account</p> <p>25 to us.</p> <p style="text-align: right;">Page 114</p>	<p>1 Examination by MR ALTMAN1</p> <p>2</p> <p>3 WITNESS D1851 (affirmed)58</p> <p>4</p> <p>5 Examination by MR ALTMAN58</p> <p>6</p> <p>7</p> <p>8</p> <p>9</p> <p>10</p> <p>11</p> <p>12</p> <p>13</p> <p>14</p> <p>15</p> <p>16</p> <p>17</p> <p>18</p> <p>19</p> <p>20</p> <p>21</p> <p>22</p> <p>23</p> <p>24</p> <p>25</p> <p style="text-align: right;">Page 116</p>

A	advised 35:7,17	Altman 1:4,14,15	April 2:5,6,22	associate 111:24
able 46:12 55:25	aeronautical 58:20	1:24 10:24 13:15	59:12 62:20	associated 102:13
65:16,24 70:13	aeroplane 26:2	40:3 41:1 48:15	110:21 112:21	assume 8:16 62:22
90:18 93:3 96:22	affect 4:12,13,15	48:25 55:15 56:4	area 56:14 65:4	79:8
98:17 107:24	4:15 31:11 60:4	56:17 57:2,14,24	90:4	assumed 79:9
109:13 114:9,9	102:19	58:8,9 60:13	arguments 15:16	asylum 3:22 10:5
absolutely 1:23	affirmed 1:5 58:7	62:10 67:14	arising 92:6	attempt 9:13,16
9:21	116:3	93:16,19,22 94:1	arm 30:20 35:6	25:21 39:9 41:14
abuse 10:12	Afghan 11:16	94:6 114:23	armoured 84:9	51:24
Abusing 18:14	Afghanistan 2:1	115:9 116:1,5	arms 88:14	attempted 10:9
abusive 28:8 74:1	4:4 5:24 7:20 9:9	amount 13:11,12	arose 7:3	15:1 28:13 30:21
accept 27:9 33:17	9:12,13,17,23	angle 71:2	arrived 5:5,8,11	41:22 42:21
74:23	11:2 19:3,8 20:5	angry 89:6 91:17	6:20,21 7:2,8	43:14 45:21
accepted 103:19	21:15 24:17	animal 19:10	11:3,12 12:24	49:11 53:5
access 65:13	37:18 46:18,20	43:20 44:2 47:6	13:3 37:12,19	attend 108:3 112:6
104:20 107:9	49:15 50:3,11	answer 26:25	64:7,9	attending 107:19
108:16	Afghanistani	27:14	arriving 63:20	attention 44:15
accompanied 44:6	11:17	answering 106:1	articles 42:5	99:24
accompanying	afraid 100:1	answers 5:20	asked 6:18 8:17	attire 44:14
44:16	afternoon 63:18	46:17	15:4 16:8 51:18	attitude 66:24
account 5:9 9:11	agitated 89:6	anxiety 60:16 61:2	51:20 52:14 57:9	attitudes 73:10
80:1 98:1 114:24	ago 80:18	72:19 102:20	66:5 73:7 75:15	August 25:20
115:5	agree 6:23 32:20	110:23	83:2,23,25,25	26:18 35:15,18
accounts 44:24	48:11,13 49:23	anxious 111:24	89:23 92:6 96:16	35:25 36:4,12,13
accurate 30:12	50:13,15 93:14	112:9,16	96:25 99:5	36:16 37:1,2
88:19,20 91:12	agreed 1:23 10:19	anybody 23:24	100:11 103:16	41:13 42:20
97:8	62:9 92:5	24:4 38:3	109:20 110:1	Authority 78:14
accused 10:6	agreement 9:24	Apart 68:2 71:11	asking 2:9 6:8 12:4	available 8:24
ACDT 38:11,13	ahead 46:6 108:7	apologies 1:11	12:7 29:14 40:5	13:20 32:18 35:6
act 15:10	air 71:10 112:15	apologise 58:4	55:15 62:12	42:15 47:7,16,16
action 41:19,25	aircraft 26:23 27:3	apologised 103:19	75:10 83:1,22	47:23 62:13,14
actions 45:17	45:5 47:7	apology 103:20	84:3 95:6 96:11	62:16 71:25 72:2
activities 17:15,16	airline 25:18 26:1	apparent 36:10	96:15,16 105:6	86:1
17:17	Airlines 22:19	apparently 32:23	108:24	avert 56:22
actual 53:6	airport 19:9,16	46:11	asks 5:19	avoid 86:22 98:23
added 45:2	30:14 43:15	appeal 3:22 10:5	aspect 10:13 34:12	103:15
addict 111:23	44:10	appear 6:22	aspects 34:14 61:3	avoidant 51:25
additional 56:14	alarm 13:14	appearance 6:1	98:8	avoiding 101:8
addressing 1:10	alerted 46:20	appears 5:16 6:1,6	assault 47:25 48:3	aware 57:2,4
adduce 1:22	allegation 27:11	appetite 111:20	assaulted 61:8	76:12,24 77:1,3
adduced 62:8	27:12 29:2 43:18	application 61:15	91:17	78:9,19,20,21,25
adjourned 115:18	43:19 47:11	63:3 79:2,10	assessment 6:14	82:6 83:17 110:5
Administrative	allegations 42:24	96:7	6:16 24:13 25:18	
96:7	allow 9:25 28:23	appointed 64:18	25:19 26:1 37:19	B
admission 2:20	52:18 56:22	appreciate 1:9	112:6,12	B 13:2 25:24 67:16
7:15	114:12	86:19	assessments	67:18,20,21,22
admitted 64:21	allowed 3:13 11:25	appreciated 115:5	102:10	67:23 68:1,3,15
66:4	altercation 96:20	appropriate 47:9	assistant 5:10 6:11	68:16,18
advice 35:22 57:13	99:16	approved 45:12	7:7	B/4 95:23
				back 7:13 8:10

16:20 17:4 19:3 19:7 20:5,16 21:15 23:7,17 25:5,7,10,11,14 28:4,5,5 29:17,23 30:5 31:17 33:6 43:5 47:19 50:3 50:11 61:3,6,13 61:21 63:6,7 73:5,7 74:25 84:24 85:1,9 87:5 88:14 89:14 89:15,16,17 90:20 91:2,5,20 92:1 100:10 105:10,19 108:5 108:9 109:19 110:17 112:24,25 113:12 background 58:11 62:6 backwards 84:11 bad 18:23,24 33:5 39:20,21,22,24 40:6,6 66:12 73:22,25 76:15 85:2 100:9 105:8 114:8 bail 3:8 8:6 42:2 49:7 61:15,17 62:2,2 88:24 balance 47:24 48:1 bang 112:9 113:18 banged 112:10,15 banging 102:23 106:12,16,17,18 barbed 64:2 barriers 78:15 based 45:17 85:3 91:1 96:21 baseline 73:1 basic 65:9 basically 70:3 basis 111:3 Batchelor 36:6 baton 95:17,20 96:23,23 batons 95:16 96:14,17	bed 14:8 71:1,2 85:9,12,17 87:2,5 87:6,18 88:13,15 88:21 89:11,12 89:13 90:10 95:2 95:9 97:4 bedding 14:7 bedroom 52:8,15 beginning 37:13 46:24 51:15 begins 62:19 behalf 8:4,17 51:19,21 96:11 96:25 behave 16:3 behaviour 6:5 26:5,22 29:3 46:25 believe 9:2,5 55:5 61:19,20 63:17 67:17 77:3 79:21 81:7,9 95:15 96:2 107:6 112:24 believed 19:6 63:3 believing 103:23 bell 105:25 106:1,2 belt 19:17,18,25 20:21 44:9 45:11 45:16,23,24 47:2 belt' 28:1 Bench 96:6 benefit 112:1 bent 97:14 best 39:20 40:12 66:22,22 71:21 78:1 98:22,23 101:4 better 24:15 32:25 33:2,11 36:25 59:10,21 100:2 104:13 112:21,24 114:20 beyond 94:25 big 77:18 84:13 bit 5:6 24:14 40:13 40:20 59:10 67:25 blanket 13:24 14:6	bleeding 32:7 blood 22:21 32:15 34:5 51:15 blow 71:10 blue 77:20 blurred 93:2 board 26:23 27:3 44:10 45:6 49:13 109:23 boarded 27:24 boarding 49:9 bodies 94:25 body 45:2 46:7,12 46:22 body-worn 80:13 80:17 92:24 boiled 82:8,10 86:3,5 boiling 82:6 85:16 86:4,8,13,23 94:13 booked 78:14 Born 5:24 Bose 8:16 bottom 8:25 10:7 25:24 29:20 31:19 36:3 47:3 49:3 79:18 101:22 110:18 111:1 box 1:4 16:17 26:10 31:23 57:24 80:12 boxes 27:17 boys 11:16,16 breaches 42:4,6 break 10:22 40:3 48:16,17,18,23 56:6,12 57:22 67:6,12 breaks 44:24 111:17 breathing 105:7 briefly 91:20 95:23 bring 59:17 109:2 broadcast 93:6,17 94:3 broke 114:3,3	Brook 2:4,14,16 3:1,11 4:1,21 5:5 5:8 7:2,3,8 8:6 11:9,11 15:8 16:13 20:6,9,16 23:8,18 24:3,23 25:6 29:23 30:14 37:12,19,21 39:19 41:21 44:22 46:5,25 51:22 52:14 53:4 53:11,13,25 54:5 55:5,9 59:11,23 59:25 63:14,20 64:21,25 65:10 66:12 69:4 98:9 98:12,17 101:17 101:25 103:5 104:21 107:4 113:6 114:2 brought 84:24 brown 42:19 71:15 Bruising 36:9 brush 60:22 building 28:6 63:9 bundle 2:10 bundles 41:18 burn 68:10 bursts 86:15 business 44:14 115:10 busy 38:23 75:24 75:24 <hr/> C <hr/> call 76:14 105:24 called 31:22 69:20 69:20,23 74:6 100:21 calls 27:18 calm 5:16 6:6 28:13 91:12,13 91:14,15,15 calmer 67:25 camcorder 80:12 camera 80:13,17 80:17 92:24 94:24,25 cancel 41:13,23 cancellation 27:21	cancelled 26:24 27:6 capable 99:25 care 47:9 66:23 99:24 103:22 cared 9:24 cares 98:20 caring 66:20 Carol 31:22 carried 97:6 102:10 case 1:5 42:5 45:25 95:25 97:17 105:4 109:2,3 caught 106:21 causation 9:5 cause 4:7 46:7,14 caused 9:6 causing 22:9 CCTV 45:7 cell 6:2,4 69:19,21 69:22 70:1,2,3,5 70:14,15 71:10 75:25 82:17 84:11,19,22 85:4 85:6 86:9,17,20 90:23 92:2,7 97:7 100:12 102:13 cellmate 68:6 71:4 80:6 85:15 86:3 96:9 106:17 cells 111:14 cent 73:21 centre 2:4 3:16 11:4 42:6 52:1,4 76:5,13 81:4,25 101:7 102:5,21 103:5 104:14 107:1,21 certain 9:21 61:17 69:5 73:18 74:11 certainly 52:21 62:12 80:16 chair 1:3,4,8,20,21 1:23 2:10 8:3 10:16,19,24 11:9 15:6,22 19:2 24:12 25:1 29:20
---	---	---	---	---

30:16 31:17 40:2 40:19,25 41:6,18 42:13 43:3 48:15 48:20 53:5 55:15 55:17,25 56:3,5 56:11,13,15,18 56:22 57:2,13,20 57:24 58:1 60:11 62:6,9,16 67:6,9 80:4 92:5,25 93:14,18 94:2 95:23 101:18 110:13 115:1,3,9 115:16 chance 82:12 chances 103:14 change 52:14,18 93:9 97:25 98:3 changed 52:24 103:25 changes 111:18 changing 98:6 chaplaincy 110:5 characterise 61:7 charter 78:15,17 78:22 chartered 77:5 check 38:9 choice 90:8 chronology 41:16 41:24 church 110:6 cipher 1:16 2:15 circle 80:14 circulating 34:5 circulation 32:12 32:15 circumstances 86:22 citizen 59:3 civil 101:23 CJS001309 29:19 CJS005624 80:3 claim 10:5 42:8,10 97:17,18 107:2 class 73:17 clean 11:12,13 13:21 71:12,13 71:14,18,21	101:5,6 cleaning 13:20,21 17:9,17 71:24 clear 64:20 clearly 6:18 43:11 47:15 client 9:2,3 10:11 client's 10:9 clinic 35:19 38:21 clogged 101:11 close 52:4 53:20 102:11 closed 93:7,9,21 closer 59:17 coincidence 108:21 cold 32:12 collapsing 103:3 104:3 Collar 35:6 come 1:25 11:2 13:12 14:25 22:21 46:12 51:15 61:3,6,13 73:7 74:14,25 79:22 83:3,23,24 83:25 84:3,9 85:1,11,13 87:7 90:3 91:21 94:20 108:9 109:19 110:9 comes 10:13 87:2 comfortably 9:13 coming 52:9 56:4 57:15 58:1 63:7 67:24 84:13 85:5 90:1,2 100:10 114:11,24 115:11 commenced 80:9 comment 10:10 common 74:9,9 commonplace 74:2 communal 100:14 101:2 communication 63:5 company 51:22 58:18	complain 16:11,15 16:16 76:2 92:9 92:13 98:14,16 100:1,3 complained 17:1 47:5 99:6,7 complaining 17:8 17:9,10,10,20 42:18 87:25 91:3 complaint 16:17 41:3 42:20 43:9 43:11,24 75:3,5,5 92:11,20,21 100:3,4 101:23 complaints 16:20 17:5,7,23 43:7 48:8 55:18,19 74:25 75:1 109:19 110:8 complete 9:20 completed 6:15 80:10 completely 102:17 107:3 compromise 34:7 computer 78:5 concentrate 69:8 concern 45:3 46:7 46:14,18 concerned 1:24 77:11 81:6 97:8 102:6 concerning 41:22 concludes 47:3 conclusion 46:13 47:17 condition 9:4 10:10 61:19 conditions 8:21 12:4 61:17,17 confirm 1:17 58:11 confirmed 93:10 connect 19:21 connected 19:23 19:25 20:20 connecting 25:23 consider 56:20 considered 92:21	consist 45:13 constant 102:20 112:17 constantly 101:25 consume 115:15 contact 7:16 65:23 65:25 107:12 content 5:16 6:6 111:5 context 102:4 continue 36:10 44:4 continued 50:10 55:3 continues 51:18 102:19 continuous 62:4 contractor 44:7 contributed 55:13 control 90:18 111:19 Convention 42:6 conversation 10:17 56:23 84:2 88:23 89:1,19,24 90:1 conversations 68:7 convicted 104:11 convictions 99:9 102:17 convicts 99:13 convince 109:17 cope 53:10,12 114:16 copy 107:13 cordon 56:9 correct 6:23 7:25 11:6 12:25 47:1 50:4 54:9 63:14 79:16 94:8 corrected 57:8 correctly 41:16 corridor 11:13 counsel 10:18 109:6 counselling 8:20 count 102:2 country 1:25 9:14 9:17 10:4 11:2	25:22 44:8 59:2 81:3 103:21 couple 80:18 104:16 course 53:4 62:17 67:9 69:17 80:19 court 81:17 95:25 96:6,7 107:11,23 109:2,6 courts 41:3 covered 56:15 cracked 13:23 Crawley 23:10 24:20 crew 84:19 85:3 cries 111:18 criminal 15:8 23:1 44:2 47:6 99:8 102:14,17 criminality 102:13 criminals 99:14 102:15 Croydon 63:10,11 crushing 60:6,7 crying 21:20,21,23 22:1 51:1,7 102:1 Cuff 35:7 cuffs 28:2 45:13 culture 102:9 current 5:13,13 7:16 currently 58:19 curtain 70:9,15,16 70:17,18,20 71:1 custody 44:6 46:2 46:11 cut 63:13 65:18 93:6,10,17 99:21 cutting 99:19
D				
D 13:8,9 25:11,12 30:10 115:22 D1618 1:5,7,16 9:11 30:4 49:9 51:23 115:24 D1851 56:5 57:25 58:7,10 97:3 116:3				

D390 61:12 70:19 80:6,25 90:23 95:20,24 96:9,13 97:2,7 102:14 D390's 87:10 97:22 D668 115:12 daily' 111:3 damaged 103:6 danger 49:14 50:2 date 2:16,19,23 5:12 24:22 25:20 30:2 31:19 35:24 35:24 78:17 dated 1:18 41:19 41:25 42:10 43:6 48:10 110:21 day 14:15 19:6 23:17,18,19,20 24:23 29:23 33:19 34:6,23 35:13 36:12 63:6 66:19 70:25 73:4 73:23 76:21 77:4 77:5 79:1,23 81:7 92:7 102:4 102:19 104:4,6 105:21 108:4,5,8 112:18 114:5 days 8:5 37:1 80:18 105:3,5 107:22 109:13,13 DCM 82:25 dead 106:9 deal 30:23 73:11 80:21 98:8 104:18 114:18 dealer 58:19 deals 11:9 40:24 dealt 30:15,16 December 1:1 112:22 115:19 decided 28:20 77:11 89:5 decision 45:18 47:2 48:10 57:10 60:24 70:22 78:10 106:23 definitely 66:7	69:14 78:25 82:18 84:6,12 98:4 deformity 34:14 delayed 27:23 deliberate 108:18 108:22,24 109:17 demeaning 73:25 102:8 Department 41:22 depending 53:8 depends 68:24 deportation 109:1 109:3 depressed 53:13 73:2 depression 60:16 61:2 110:23 Derek 23:14 describe 10:8 87:3 112:19 described 95:3 description 71:6 deserved 20:3 45:22 despite 46:9 detail 6:20 71:5 detained 2:4 4:14 13:6 24:7 31:3 40:8 59:11,12 62:1,20 66:9 67:20 69:5 93:2 98:9,11 99:8,13 99:18 103:19 115:11 detainee 27:18 45:16,18 46:2,11 66:18 75:25 76:1 106:12,14,15 detainees 23:1 30:3 44:8 60:1 77:7 92:18 101:1 101:6 107:7,21 108:13 110:3 detention 2:16,23 3:16 27:19 37:20 42:6 44:6 51:25 53:4 59:23,25 60:18,19 61:9,14	61:23,25 62:18 64:21 65:16 66:15 72:10,10 73:2,3 74:16 76:5 77:9 81:25 85:3 92:12 99:10 99:13 101:7 102:5,21 103:5 104:11,14 107:21 110:11 111:14,25 112:10 113:4 114:11,13 deteriorated 53:24 54:1 determination 57:11 93:1 diagnosed 4:1 54:19 60:15 61:1 110:24,24 Diagnosis 32:2,3 32:24 die 9:22 different 12:7 15:6 46:12 47:19,22 56:20 57:10 60:8 60:20,23 67:23 73:20 102:17 110:16 113:9,14 differently 8:10 difficult 5:7 14:19 14:21 20:6 27:11 53:10,11,12 61:22 68:12 94:23 95:3,7 108:15 111:19 difficulties 110:22 difficulty 26:9 dignity 47:9 direct 58:14 directed 41:25 directions 30:5 41:14,23 79:15 79:20 directly 71:3 director 58:18 dirty 11:12,14 71:12,13 disagreed 48:8 disclosed 78:18	discover 79:13 discuss 56:25 disdain 102:8 disgusted 111:25 disorder 4:2,6,8 4:18 7:1 8:23 60:16 disrespect 102:9 disrupt 45:3 46:21 disruptive 26:4,22 27:2,7 distressing 112:11 disturb 74:14 disturbing 90:11 91:4 Division 96:6 DL00000143 62:7 DL0000075 8:2 48:25 DL0000084 42:9 43:3 47:20 DL0000094 101:21 DL0000095 96:4 DL0000099 110:12 doctor 33:13,18 54:24 document 2:8 8:1 10:25 24:9,23,24 25:1,16 27:4,15 27:16,18,19 29:18 30:2,12,12 40:20 41:17 43:3 48:10 80:3,7,20 85:23 91:8 95:22 101:20,21 documentation 25:6,8 41:6,9 documents 40:21 41:11 42:15 76:19 80:2 109:6 doing 21:19 22:11 41:10 67:21 76:7 89:7,19,20 90:11 91:3 99:25 106:24 door 82:19 83:2,3 83:4,5,6,7,12,16	83:22,23,24,24 83:25 84:1,3,3,5 84:10,10,11,13 84:13,14 85:8,11 85:12 86:15 87:2 90:2,2,3,9,10 94:7,10,12 106:5 106:12,16 107:25 doors 102:23 112:13 down' 111:17 downstairs 106:4 Dr 8:16 33:15 110:14 draining 101:24 draw 44:15 drug 68:24,25 98:24 drugs 12:22,23 68:15,22 102:9 104:3 due 51:7,8 Duncan 41:7,12,19 42:9 duty 47:9
E				
E 13:3,4,11,12 19:7 25:7,9,14 30:7,13 115:22 earlier 15:5 49:2 73:8 109:19 earliest 105:2 early 63:20 108:5 easier 2:9 14:3,5 42:14 easiest 60:6 easily 71:2 easy 13:21 57:16 59:24 72:7 103:9 104:21,23 107:1 113:3,3 115:4 eat 114:2 Eden 30:3 edge 102:2 effect 10:10 103:9 effort 51:24 eight 100:24 either 1:5 21:7,13 85:20 106:8,9				

<p>electricity 94:17 embarrassed 43:21 emergencies 104:3 emergency 105:25 106:1,2,10 emotional 7:11 emotions 91:16 111:19 employed 58:15 58:16 engage 41:1 engaged 26:22 engineering 58:20 English 5:22 7:16 18:15 27:11 55:22,24 enjoyable 72:16 entries 35:2 36:14 37:3 entry 7:14 34:24 environment 11:8 98:18 100:11 equipped 114:17 error 65:22 erstwhile 96:9 escort 20:14 44:8 44:21 45:5,24 escorted 30:5 44:9 44:11 escorting 46:23 47:1 escorts 27:23 28:14,21,23 29:12 43:14 44:12,13,23,24 45:8 46:16,20 47:8,15,24 48:2 escorts' 45:18 especially 104:10 EU 59:2,3 Europe 9:15 European 42:5 evening 14:12 event 10:1 61:7 events 4:4 9:8 37:2 61:5,6 eventually 28:20 42:2 54:16 63:12</p>	<p>67:14 everybody 9:23 85:25 99:2 everyday 99:3 104:2 evidence 47:7,23 57:17 58:1 93:22 115:11,13,14 ex-convict 99:17 exact 74:2 exactly 35:24 58:17 74:9 78:24 83:20 87:6 114:3 Examination 1:14 58:8 116:1,5 example 9:7 37:20 98:12 106:12 109:10 excessive 47:13 excited 113:12 exhibited 26:4 exists 70:12 104:1 expand 2:12 5:5 6:12 8:12 24:13 25:3 27:17 35:1 80:4 101:21 expect 66:25 experience 57:16 59:24 60:2,3 91:1 97:21 98:2 98:4,5,9 100:4 103:7,8 104:12 104:13,24 105:3 106:15 115:4 experienced 69:24 72:23 85:2 91:17 91:18 97:20 99:15 102:18 103:10 104:2 112:17 experiences 55:5,9 74:7 104:7 111:2 111:12,17 experiencing 51:8 72:11,25 104:9 105:21 expert 60:25 114:6 explain 97:22 113:3</p>	<p>explained 92:10 expressed 10:6 extended 102:16 eye 7:15 eyes 12:21 17:25 53:20 56:22</p> <hr/> <p style="text-align: center;">F</p> <hr/> <p>fabric 45:12 face 60:23 91:7 faced 52:8 facedown 88:15 faces 76:10 facilities 17:15 39:19 45:10 fact 24:10 29:8 46:10 52:7 53:7 58:4 59:1 62:13 69:4 82:6 102:20 106:22 110:15 factor 55:6 factors 9:5 fail 102:25 failed 32:5 fall 32:8 false 29:6,7 family 102:16,16 fan 71:9 fancy 34:4 far 1:24 7:9 57:4 76:23 81:6 93:3 97:8 112:13 father 54:8,9,14 fault 47:21 110:16 fax 107:15 109:15 feared 85:3 86:23 feel 12:14 31:14 33:2,11 40:12 73:13 97:25 100:15 111:23 feeling 36:25 40:17 74:18 feels 1:11 58:5 fellow 24:7 31:3 102:12 felt 12:8 32:25 40:5 44:1 51:14 63:23 72:18,19 91:16 97:20 107:6 111:25</p>	<p>112:15 113:11 female 39:14 fences 64:3 fight 15:18,20 17:25 18:2 20:9 fighting 12:20 17:24 fight 15:14 file 3:6 filled 55:18 finally 42:8 52:23 53:3 62:2 105:5 107:23 110:9 112:8 financially 114:10 find 11:19 13:21 14:18 53:16,17 54:11 66:11 67:20 70:19,21 73:3 101:19 102:11 104:20,21 106:25 finding 34:13 60:5 finds 111:18 fine 40:2 90:23 fingers 32:10 finish 36:18 104:17 finished 48:17 Fire 13:14 first 3:15 7:13 10:8 10:15,25 11:3 12:24 13:3 25:21 29:21 35:5 38:9 41:10 44:10 49:10 51:24 56:7 60:21 64:22 68:14 79:25 87:3 93:11 94:7 97:13 104:18 106:21 113:7,9,24 fit 6:2 90:17 five 10:17 56:16,17 67:10 80:9 84:13 87:9 109:13 flag 2:11 24:12 flashbacks 111:12 111:16,17 flat 89:12,13</p>	<p>flex 34:15 flight 25:22 27:24 29:3 32:5 44:10 45:3 76:25 77:5 78:11,14 79:6,7 81:8,10 84:25 float 101:11 floor 82:17 86:7,9 86:13 106:3,3,5 flu 104:25 105:7 fly 28:21,23 focus 87:13,21 96:10 follow 27:15 followed 61:14 115:13 following 3:22 63:21 101:20 108:5 food 98:13 102:3 footage 79:25 80:17 90:15 92:24 93:1,4,7,9 93:11 94:6 97:24 football 17:14 force 28:12 32:8 45:4 47:13 50:7 79:24 80:3,9,19 82:6 85:23 91:11 92:9 forced 49:10 forcefully 84:22 forearm 34:1,2 forehead 28:17 forget 76:20 80:20 forgive 53:7 63:13 83:11 97:1 110:15 forgotten 34:21 form 24:13 38:17 44:13 66:19 82:6 85:23 forms 55:19 forward 59:5 92:11 found 53:10 59:23 61:22 68:12 79:3 101:2,17 four 37:2 87:10</p>
---	---	--	--	---

105:4 107:22 109:13 frankincense 68:11 free 11:25 freedom 102:4 frequency 109:18 frequently 73:25 102:1 Friday 1:1 friend 14:23 17:25 friends 24:6 55:23 102:16 113:16 frighten 15:12 front 20:24,25 58:12 88:15 89:14 96:4 frothing 103:4 Fuck 74:3,13 75:19 full 42:16 funnily 113:22 further 77:12 78:16 future 45:19	90:9 103:15 107:17 give 16:23,25 17:7 18:9 58:1 104:14 105:9,13,23 115:11 given 26:25 32:15 35:8,16,22,25 75:2 78:16 80:10 81:6 98:1 108:1 108:1 giving 114:24 globalises 101:16 go 1:21 2:10 3:13 6:4 7:13 8:10,24 9:25 10:15 11:25 21:15 25:23 31:16,17,18 33:6 34:11,17,17,24 35:1 36:3,4 37:22 38:21 43:5 43:17 46:6,10 47:14,19 50:10 53:16 60:24 62:3 63:7 64:7 67:14 71:5 74:10 75:23 75:24,24 83:22 85:8,12,24 88:2,3 88:16,24 90:25 94:19 96:9 105:10 108:5 110:17 113:12,16 113:17 114:5,14 God's 104:6 goes 5:18 6:12,17 34:9 76:23 93:4 100:8 going 1:9,20,21 6:19 8:12 9:22 14:23 18:25 19:3 19:7 20:5,9 25:2 25:9 27:8 34:11 36:21 38:9 40:19 40:20,23 41:8,14 42:12,15 45:20 47:14 48:15 51:20 52:10 56:6 58:3 59:8 61:5 62:7,22 63:12	75:10 77:1,4,5 79:24 80:17 81:8 81:9,11 85:24 86:18 88:22 89:1 90:10 91:9 92:23 92:23 95:1 110:11 111:25 112:14,18,18 good 1:3 7:15 32:12 39:19 48:16 60:2 66:12 69:25 73:21 101:5 107:4 114:23 gotten 114:18 GP 32:18,25 60:25 110:24 granted 3:20 54:16 78:15 graphically 100:13 grateful 57:17 Group 110:4 guard 17:25 18:3 21:7,7 22:7 38:7 38:19 39:11 50:17 guards 17:10,18 17:19,19 18:6 19:9 20:14 21:12 21:13 23:13 24:4 24:7,8 49:18 96:12 guy 23:1 77:18 90:17 guys 69:7,9 gym 111:23,25 gyms 111:24	48:2 50:6,18,20 50:25 51:8 89:16 90:19 99:21 Hand-held 80:12 handcuff 19:21 20:18,22 24:25 90:19,22 handcuffed 24:18 handcuffs 19:20 20:20 21:1 22:4 28:2 49:19 90:12 handing 76:19 Handler 93:22 hands 19:19 20:24 20:24 happen 25:4,5 62:22 63:2 81:12 81:15 84:4 85:7 93:3 98:22 108:23 112:19 happened 3:5 19:1 20:11,12,16 22:23 27:14 29:13,17 36:4 38:8 42:11 55:10 79:6 80:1,22 81:24 82:12 85:1 86:2,11 89:3 90:21 91:19 92:1 92:7,19 93:19 98:2 99:11,12 105:18 106:11,18 108:4 109:9,18 113:18 happening 65:8 81:20 83:10 86:13 96:19 97:11 98:20 113:5 happens 87:4 111:6 happy 9:12 12:14 46:6 91:23 hard 60:5 65:20 69:24 72:24 73:6 73:15,17 81:11 84:10 97:22 106:18 109:17 113:2	hardened 99:14 harder 24:14 harm 6:9 37:21 hated 102:18 head 16:25 28:17 28:19 39:7 84:15 90:9 99:19,21 headache 36:20 105:21 headaches 4:11,24 72:11,12,13 headbutt 28:13,15 28:18 heading 43:23 healing 36:9 health 4:21 5:25 6:22 9:4,9 38:3,4 39:11 53:24 54:2 54:4 55:3,6,13 60:4 66:6,8 110:11,19,22 healthcare 5:10 6:11 7:7 30:15 36:21 39:18 64:12,22 66:5 104:21,25 healthy 6:1 hear 16:20 59:5,8 59:8,18 94:18 97:4 102:21,23 103:2 106:1,4 112:8 heard 17:4,6 38:11 70:8,8 87:25 99:17 109:21 110:2,3 112:13 hearing 52:3,5 56:8 62:2 88:24 94:14,16,17 113:18 115:5,18 heavy 40:20 90:10 102:23 held 88:13,14 helmets 83:21 help 16:9,10 35:22 38:22 39:25 40:8 40:10 56:1 74:11 74:11 75:23 102:10 105:15,18
G G4S 51:21 76:25 96:25 99:5 100:21 game 98:13 gang 102:9,11,12 102:12 gangs 15:10 gates 64:3 Gatwick 25:10 43:15 44:9 52:3 52:8 55:10 63:14 110:3 113:8 gear 83:18 84:8 gem 58:19 general 32:18 66:11 generalised 75:1 generally 39:19 69:16 101:6 105:13 gentleman 57:24 gentleman's 41:7 getting 28:3 84:15				
		H Halari 110:14 half 2:12 6:12 8:25 25:24 32:22 33:2 35:1 49:3 56:9 65:7,15 70:16 80:4 101:22 107:9 Halfway 5:21 halve 5:6 hand 21:9,9,11,11 22:2,7,8 32:8		

106:14,17 110:6 114:9,14,19 helpful 56:10 helping 17:21 18:1 helps 29:19 105:13 high 64:3 69:9 81:17 95:25 96:6 history 2:20 3:18 5:9 6:10 7:14 10:2 27:19 31:2 31:25 35:4 36:7 hit 28:17 90:9 96:12 hits 74:21 84:12 hitting 84:14 95:20 holding 87:15,17 94:24 hole 35:23 HOM0322101 25:2 HOM0322267 27:16 HOM0322313 42:2 HOM0322322 41:11 HOM0322339 41:17 HOM0332009 2:12 24:11 31:18 home 3:7 27:19 41:21,25 42:4,23 43:8 44:7 45:12 51:19 63:4,8 65:25 76:4,12,13 92:4 96:11 97:1 97:1 98:21 107:12,24 113:2 113:13,20 114:12 honest 97:19 101:10 hope 2:13 42:12 43:4 109:3 hopefully 6:20 93:23 horrible 112:20,25 hospital 23:10,14 24:2,10,20,24	29:24 hour 28:3 32:22 33:2 64:11 65:7 hour's 56:9 hours 63:16,21 64:10,25 65:7 72:16 101:9 house 2:4,14,16,20 3:1,11 4:1,21 5:5 5:8 7:2,3,8,15 8:6 9:25 11:9,11 15:8 16:13 20:6 20:9,16 23:8,18 24:3,23 25:6 29:23 30:14 37:12,19,21 39:19 41:21 44:22 46:5,25 51:22 52:14 53:4 53:11,13,25 54:5 55:5,9 59:11,23 59:25 61:21 63:11,14,16,20 64:21,25 65:10 65:12 66:12 69:4 98:9,12,17 101:17,25 103:5 104:21 107:4 113:6,16 114:2 houses 40:23 huge 64:3 human 67:1 hurting 88:22 Husein 33:15 hygiene 101:4 hygienic 101:10 <hr/> I <hr/> ibuprofen 32:16 35:8,15,16,25 ice 32:18 35:6 idea 16:23,25 17:1 17:7 62:22 104:15 identify 93:1 idiot 74:4,14 ignored 16:8 97:6 ignoring 16:6,6,7 16:7 17:22 ill 60:9	illegible 8:13 imagine 5:18 101:23 Imagining 53:22 IMB 109:23 immediate 45:19 102:16 immediately 92:10 92:14 immigration 11:4 55:2 62:6 76:3 102:5,7 impact 9:8 10:8 53:4 97:21 110:11 impersonal 1:12 58:5 imposing 63:25 Impressions 6:5 improve 37:5 improvement 114:22 in-possession 6:14 inappropriate 47:12 incident 10:8,11 29:21 49:11 include 55:10 inconsistently 27:1 Independent 109:23 indicate 9:8 indicated 38:2 indicates 86:7 indicating 34:16 46:7,14 indication 93:16 94:2 indicator 26:18 indicators 25:25 individual 85:24 inductees 68:2 induction 12:25 64:7 67:2,15 infection 36:9 information 5:3,4 10:4 45:9 62:6 100:7 informed 77:8	78:8 initial 97:13 initially 60:21 61:1 61:19 91:1 95:11 injured 84:15 injuries 23:24 24:5 31:4 92:6 injurious 37:21 injury 14:25 22:6 24:18,25 29:9,10 29:13,15 30:16 30:19 31:12 34:8 37:5 innocent 104:10 INQ000055 1:20 inquiry 1:15,18 53:6,9 57:6 58:10 62:17 93:12 98:1,7 104:8 109:21 inside 11:13,24 83:17 instances 74:2 86:6 intended 45:3 46:21 intention 39:6 internet 106:25 107:10,10,16 108:10,11,11,15 109:15 interrupted 102:25 interview 42:19 43:24 interviewed 42:18 46:3,3 intolerable 104:22 introduced 58:9 introduction 59:22 73:8 intrusive 11:5 111:2 investigator 48:7 invite 1:21 93:5 invited 113:17 involved 100:7 issue 11:1,1 57:8 98:13 105:6	issues 4:19 6:17,22 45:6 66:6 75:1 99:6 Istanbul 25:23 44:10 italics 78:12 items 13:21 <hr/> J <hr/> Janina 35:14 January 101:18 jogs 88:9 journey 10:4 45:1 judicial 79:2,10 81:16 82:2 107:13,22 109:12 judicially 106:23 July 3:22 18:25 19:1,3 23:20 24:22 25:4 26:13 27:6,14,20 29:3 29:21 30:2,6 31:20 33:14 37:1 37:1 41:4,22 42:11,21 43:10 43:14 45:22 49:12 55:11 59:13 61:14 jump 112:9 jumping 113:18 June 42:10 61:9 79:16,20,22 80:23 81:9,10,13 86:21 Justice 96:6 justified 107:3 <hr/> K <hr/> Kabul 25:23 keep 5:1 16:6 22:2 22:7 52:15 76:7 107:5 kept 4:14 16:7 97:5 ketchup 114:2 kettle 82:7,7,9 85:16 86:2,4,8,13 86:22 94:13 key 25:24 keys 111:14
---	--	---	---	--

kidnapping 9:13 9:16,20 11:1,5 killing 103:1 kind 12:18 17:7,23 18:13 64:3 65:8 67:21,24 68:24 79:12 112:25 knew 77:9,23,25 99:2,11 109:11 know 20:13 22:11 23:1,10 28:15 31:2,9 37:24 38:10,17,23 39:12 48:9 52:2 54:8 57:16 58:13 61:12 64:15,18 66:2,16,21 68:13 69:3,7 70:7,9 71:9 73:10 74:16 75:17 76:9 77:19 78:2 79:8,23 80:16,16 81:8 82:4,19 85:5 86:24,25 91:24 95:17 97:10,12 99:3,22 102:15 102:15 107:20 108:17 109:16 112:17 114:17 115:2,4 knowledge 85:4 known 1:16 5:9 26:4 48:9 58:9 <hr/> L lack 46:18,19 70:11 75:24 lacking 101:2 lady 64:15 landed 27:23 language 45:2 46:7,12,22 74:1 74:10 late 5:11 law 59:2 103:22,23 103:24 law-abiding 102:14 lay 87:5 laying 91:4	lead 67:22 leaflet 45:9 leak 13:24 leaking 13:23 leave 54:16 84:18 85:4 89:2,22,23 89:25 96:15 97:5 113:15 led 26:23 27:21 89:18 left 9:14,17 21:9 21:11 60:19 91:6 101:6 113:4 legal 59:1 107:2,11 109:2 length 104:19 let's 2:8 5:1 11:8 29:17,19 30:15 31:16,17 33:23 43:2 58:14 80:2 87:13,21 88:9 89:2 96:3 110:19 111:10 letter 41:18,19,24 42:8 43:6 44:17 48:4 letters 41:6 levels 72:18 Lewis 41:7,12,19 42:9 life 39:4 49:14 50:2 60:3 91:18 99:9,15,16 100:2 101:25 103:12 112:15,23 113:21 lifestyle 73:1 light 8:20 46:25 47:23 lights 94:20 likes 88:23 liking 52:5 line 5:12 99:14 lines 10:25 79:17 list 5:19 6:17,19 36:18 41:8 77:8 78:7 listed 42:17 listen 14:4 53:19 98:19 100:4	listened 103:17 listening 76:8,10 literally 111:17 little 3:18 15:5 27:1 49:1 58:10 59:17,21 61:3 73:8 83:12,13,14 91:5 109:19 live 11:19 54:7,9 54:14 74:22 93:10 lives 67:22 living 9:12 53:12 location 6:2 lock-in 72:5 locked 12:19 14:10 14:15,18,21 15:2 63:15,17 64:10 70:24,24 72:3,4 92:1 101:9 102:3 106:5 112:13 locking 112:13 log 80:10 London 63:7 long 61:18 64:22 67:18 68:2 103:15 107:5 longer 48:18 101:8 101:9 look 2:8 5:11 8:1,8 8:9,11 14:2,4 25:8,16,25 31:16 32:25 35:17 36:4 43:17 49:2 78:11 79:24 88:8 95:22 96:24 99:7 110:19 looked 49:6 64:2,6 81:6 85:25 looking 15:6 31:19 34:20 44:3 46:16 47:21 49:1 63:23 76:23 104:3 110:16 looks 36:19 lost 102:2 111:21 112:2 lot 5:3 32:25 33:2 33:11 62:5 66:14	84:17 88:21 89:1 99:23 107:6 111:21,22 lots 72:11 91:15 loud 106:2,4 112:9 low 6:16 lucky 70:14,21 72:14 108:7 Lunar 2:20 7:15 61:21 63:11,16 65:12 lying 89:12 Lyn 34:25 <hr/> M machine 107:15 109:15 machines 106:25 Madam 93:22 main 9:5 maintained 7:15 61:18 majority 60:1 66:23 98:21 99:22 101:7 102:3 108:2 making 21:25 42:3 82:13 86:20 110:8 male 39:14,15 man 24:24 31:3 115:11 manager 28:20,22 39:16 75:20 77:21,22 82:23 94:7 managers 77:13 Maria 42:19 marijuana 69:1 marks 32:6 married 59:4 matter 2:24 25:17 30:11 45:17 103:25 matters 15:8 meal 14:16,17 meals 35:17 mean 12:8,9 14:8 16:23 42:25 70:2 70:17 75:14	90:22 91:6 meaning 34:4 means 26:21 28:5 32:15 34:16 52:2 54:1 62:10 107:17 meant 8:9 65:18 110:14,17 measure 40:22 medical 2:14 5:1 31:16 34:4,10 37:13 medication 5:13 5:14 6:14,16 7:17 8:20 36:11 54:22 meet 56:7 64:12 member 55:20 64:23 members 15:22,23 69:12,12 102:11 102:12,12 memory 4:12,15 4:19 88:9 89:10 95:6 men 11:24 12:5,20 13:16 23:4 24:7 40:9 67:21 69:5 84:13 98:9,11 99:8 mental 4:21 6:5,22 9:4,9 38:3,4 39:11 53:24 54:2 54:4 55:3,6,13 60:4 66:5,8 103:9 110:18 mentality 74:17 mentally 31:14 101:24 103:6 mention 29:10 62:13 86:6 mentioned 72:4 met 64:14 metal 21:1,2,3 84:10 90:10 102:23 method 43:21 microphone 59:17 59:19
---	--	---	---	---

middle 21:9 72:24 102:22 106:16 mind 9:22 83:15 mine 109:11 minimum 44:12 44:12 minute 10:14 67:4 minutes 10:17 32:24 33:14 34:24 56:16,18 67:10 92:2 93:11 104:17 mistaken 57:7 mistakes 103:24 Mmm 61:10,16 74:9 mobile 65:17 moment 31:8,10 45:20 87:21 89:2 96:10 moments 56:24 Monday 115:10,12 115:16,19 money 114:14 monitor 36:10 38:17 Monitoring 109:23 month 16:24 25:20 months 2:25 3:15 11:4 16:23 17:2 60:21 61:20 68:8 107:8 113:1 mood 111:18 morning 1:3 14:13 63:21 72:6,15 Moroccan 68:6 moron 74:6 Morris 10:16,20 56:11,13,19 mother 9:25 motivation 112:2 mouth 103:4 move 11:8 32:10 48:18 53:3 54:12 59:5 98:7 moved 30:6 54:17 68:19,20 80:23 movement 32:9	34:12,14 movements 34:10 movies 64:5 moving 13:15 88:25 Murphy 23:14 music 53:20 <hr/> N <hr/> n 35:7 115:22 naive 63:1 65:21 name 1:10 36:5 58:4 64:1,16,17 64:19 76:25 77:10,13 78:3,6 nasal 105:12 national 58:22 Nationality 24:17 natural 72:21 nature 59:22 near 63:14 nearly 64:10 necessary 32:9 need 14:3,4 17:13 17:22 35:1,5 41:12 43:16 58:12 69:22 93:14,16 99:1,4 106:14 114:5,19 needed 75:12,18 75:21 104:20,25 needs 25:16 57:10 93:2 98:5 106:17 negative 46:22 111:2 nerves 34:9 neurovascular 34:7 never 5:15 7:18,23 17:4,6 39:9 60:1 60:2 64:4 72:23 89:24 91:18 99:14,15,15 103:11,17 110:6 new 2:20 7:15 67:24 news 64:5 76:15 77:4 NGO 115:14 NHS 114:10	nice 15:24 Nigeria 77:5 Nigerian 58:22 77:6,7 80:7 night 14:10,18,22 15:2 30:10,22 31:22 54:12 63:19 64:24 70:25 72:3,8 102:22 105:21 106:16 nightmares 4:9,10 4:24 54:11 111:4 111:5 nights 12:24 102:2 no-one 38:24 76:8 98:19,20 noise 21:25 noises 70:10 71:6 100:12 non-existent 102:5 noon 57:20 normal 6:2 64:3 68:23 73:1 113:25 normality 34:13 noted 36:8 notes 37:13 notice 78:17 94:19 noticed 97:3 113:9 November 1:18 3:3,5,6,9 8:4,5 49:6 88:10 nowadays 62:25 number 2:14 24:16 25:25 26:3 26:19,25 27:1 30:3 44:12 80:10 83:18 107:20 108:1,1 numbers 16:25 58:14 110:17 nurse 5:18 31:22 32:1,22 33:4 34:6,25 35:3,9,18 36:5 64:16 68:13 105:2,8 <hr/> O <hr/> o'clock 14:12	63:23 115:10,12 O'Doherty 34:25 observations 5:25 38:15 obvious 29:12 51:23 86:4 obviously 1:9 46:3 56:7 occasion 26:10,12 27:2 52:22 occasionally 11:5 86:19 occasions 36:22,23 98:11 112:5 occupancy 6:3 occurred 9:14,21 occurrence 72:13 October 42:1 43:6 48:11 offer 76:5 offered 44:23,25 offering 45:8,8 office 3:7 27:19 35:7 41:25 42:4 42:23 43:8 44:7 45:12 51:19 52:23 63:4 65:25 75:10,13,14,15 75:15 76:4,12,13 78:4,4 92:4 96:11 97:1,1 98:21 105:11 106:4,6 107:12 107:18,24 108:12 114:12 officer 39:16,17,17 39:18 46:2,11 76:3 82:19 officers 15:20 32:7 44:7 47:12 61:9 76:25 77:19 82:5 83:18 86:1,19 87:9,19 88:5 89:4 90:24 94:19 95:1,16 97:13 98:21 102:6,7 officers' 43:21 official 92:20,22 105:1	officially 77:3 92:20 Oh 68:23 76:14 78:6 106:11 114:8 okay 6:21 11:13 40:5 56:24 57:13 59:7,20 60:10 62:15 66:14 68:23 73:16 74:21 81:23 82:9 87:10,11 88:3,12 93:18 99:13 103:23 105:14,17 old 2:2 58:24 71:14 Ombudsman 110:2 once 7:3 11:6 16:24,24 18:4,5 48:17 69:1,2 86:5 90:23 93:10 93:19 106:19 112:5 ones 16:3 21:1,2,3 42:16 ongoing 63:3 onwards 15:7 40:24 42:10 44:22 53:6 73:12 80:21 98:10 Oozeerally 33:15 open 5:1 84:11 86:15 87:2 93:8 94:5 opened 38:17 92:18 opening 71:9 opportunity 27:14 oppressed 66:16 oppressor 66:17 oral 92:21 order 27:20 41:23 50:6 56:7 81:19 86:22 91:9 107:1 112:5 ordinary 111:16 organisations 109:22
---	---	--	--	---

origin 1:25 original 2:23 originally 2:23 originating 42:8 outside 65:18 82:17 83:18 outstanding 78:15 overall 73:20 overmuch 30:11 41:10 overseas 43:13 44:11 oversight 75:2 109:20	15:23 19:1 30:18 44:4 45:14 46:24 49:4 53:5 58:14 62:19,19 63:24 73:12,24 76:24 78:12 79:14,17 88:8 96:10,24 98:10 101:22 103:7 108:15 110:18 111:1 112:3,8 paragraphs 11:10 40:24 43:16 44:4 80:21 111:9 parcel 112:5 part 35:5 84:2 88:23 89:19 104:7 113:17 particular 73:19 104:24 112:4 partition 100:19 partner 66:1,2 114:6 passage 51:21 passed 39:7 Passengers 22:17 22:18 pattern 108:23 Pause 87:21 pay 105:15,16 pending 82:2 people 15:7,16 22:15 40:7,8,10 40:11 44:3,13 66:14 67:24 68:1 68:3 69:7,20,24 73:15 74:19 81:25 84:8,22,25 93:12 100:9 102:12,21,23 103:3,23 104:3,3 104:9,10,11 108:4,7,20 109:1 109:5 113:9,11 perfused 34:4 period 3:15 59:11 60:17 72:11 108:25 109:11 periods 109:10	persistent 74:13 person 44:15,21 45:5 60:8,24 64:20 68:5 70:6 73:16 93:2 100:7 100:19,20 101:13 102:14 106:7 personally 59:25 phone 65:8,10,11 65:13,17 photocopiers 106:25 photographs 23:24 24:4 31:3 31:4,6,7 physical 6:1 10:12 20:15 92:6 110:19,22 physically 27:7 28:8 103:6 picked 63:18 73:4 picking 76:20 79:13 piled 69:9 piling 104:4 pilot 22:25 23:2,6 pinned 61:8 90:24 90:25 95:2,8 97:3 pinning 84:15 pinpoint 74:1 place 11:19,19 12:20 15:5 29:21 47:2 66:22 72:7 107:4 113:13 placed 35:6 44:8 49:18 90:19 places 30:17 53:16 Placing 45:16 plan 34:17 35:5 36:10 plane 20:11,12,15 20:22 21:3 22:15 22:19,24,24 23:5 23:7 27:23 28:3 28:5 29:13,15,22 49:9 50:7 55:10 planes 51:25 52:3 52:5,9,16,19	plans 46:19 plaques 71:15 plastic 21:1 114:1 plate 114:1 plates 113:24,25 114:2 play 92:23 played 93:7,12,25 playing 17:11,13 17:13 please 1:17 2:11 5:1,6 6:13 8:1,2 8:25 9:8 10:8,10 24:9,11,14,15 25:2,3,24 27:16 27:17 29:19,21 30:16 31:18,19 36:3,6,17 37:11 43:5,17 45:10 47:17,19 48:19 48:25 58:11 59:18 73:13 75:22 79:22 80:4 80:20 93:6 94:1 94:3 95:23 96:10 98:7 101:20 104:8 110:9,12 110:18 111:1,8 pm 57:23 63:17 67:11,13 72:5 115:17 point 9:20 20:6 41:1 49:22 50:12 60:23 63:1 64:13 64:14 65:21 69:6 69:22 70:19,22 81:14,16 84:1 86:15 91:25 94:24 96:19 104:25 106:24 107:12 pointed 57:7 police 99:16 pool 98:13 poor 55:3,6,13 102:3 position 6:25 possibility 46:20 77:10 81:13	90:16 97:11,12 97:15 possible 10:16 35:12 90:8 107:5 108:5 109:7 possibly 25:9 post-traumatic 4:2 4:6,18 7:1 8:23 60:16 potentially 61:2 Povy-Meier 77:16 82:25 91:10 94:8 power 66:17,18 74:17,22 86:17 86:18,20 practitioner 32:18 pray 104:7 precisely 85:22 premises 76:13 prepared 8:4 prescribed 36:12 36:13,16,20 present 5:14 7:17 26:8 45:19 pressed 51:14 presumably 61:22 65:1 69:11 71:5 78:19 pretty 60:5 86:11 prevent 78:16 previous 27:2 101:13 previously 26:20 26:21 prison 15:8 63:24 64:2,4,4 70:2,3,3 99:18 104:12 111:15 113:21,24 113:25 Prisoner 6:9,14 prisoner's 5:25 6:5 Prisons 110:2 privacy 12:6 70:5 70:11,12 101:3 private 100:15,21 100:22 probability 47:24 probably 8:9 14:5 33:17 36:13
---	--	--	---	--

47:21 59:21 64:24 65:15 69:23 72:22,25 74:19 75:5,20 82:13 85:20,21 87:11 92:10 100:24,25 104:9 104:14 105:2,3 107:8 108:6 110:14 113:1 Probation 110:2 problem 35:14 67:7 105:14 problems 4:6,7 66:8 98:15 procedure 45:17 proceeded 96:12 proceedings 82:2 process 37:22 61:24 62:4 64:8 65:22 83:3 84:16 84:23 89:17 107:11 114:15 products 13:20 17:9,17 71:24 professional 42:23 43:7 48:7 64:12 109:22 profit 41:10 programme 113:20,22 programmes 111:15 Proper 71:17 propose 55:15 protect 89:21 103:24 protesting 20:14 21:17 provide 36:7 62:5 provided 1:17 44:24 71:22,23 80:18 103:17 providing 45:9 psychiatric 8:3,13 10:9 49:6 psychiatrist 8:16 8:22 9:10 10:2,3 11:3 49:5,23,24	50:8,21 51:18 52:7,12 54:24 psychological 110:13 psychologist 110:20 111:22 112:7 PTSD 6:25 7:8 8:23 54:20 61:2 110:24 publicly 47:17 62:14 published 42:16 puddles 82:16 pulled 20:17 punch 35:23 purposes 1:15 58:10 62:17 94:2 101:23 109:20 pursue 107:2 push 28:3,5 84:14 87:18 89:16 91:2 95:13 97:15 pushed 28:5 88:14 put 2:9,11 8:2 10:24 12:9 16:17 19:7,12 20:8,22 21:2 24:9,11 25:7,11 29:18 38:11,13 40:21 41:12 43:2 45:22 48:25 50:18 60:13 66:16 70:20 79:6,7 80:2 81:8,10 88:21 89:5,8,15 89:17 90:12 91:22 93:23 96:3 97:14 101:19 105:1 110:12 112:10 putting 16:24 84:25	8:25 24:3 26:7 26:14 49:4 55:17 62:12 96:25 101:15 103:21 questions 5:2,20 8:17,18 46:17 51:19,20 55:16 92:4 93:20 94:4 96:11 99:5 100:11 115:1,2 queue 107:25 quiet 22:13 112:12 quite 40:19 52:13 61:22 79:25	reasons 1:12 58:3 84:17 86:4 recall 29:24 57:5 90:24 92:25 recalled 45:2 46:2 46:15,22 recalling 44:24 receive 107:14 received 79:15,19 93:5 reception 65:1,2,3 65:4,6 reciting 102:24 recognise 72:22 74:20 recognised 23:13 recollect 66:7 86:14 recollection 59:15 59:16 82:9,14 86:17 109:9 recommendations 8:19 record 7:10 33:17 40:21 44:21 45:5 78:9,12 recording 46:9 records 2:14 5:1 10:3 31:16 rectify 65:24 red 32:6 redacted 93:2 Reed 31:22 refer 1:10 58:3,5 referred 60:25 refreshment 45:8 refreshments 44:23 refugee 3:20 refusal 10:5 refuse 28:20 refusing 89:22 regard 69:21 regarding 42:20 43:13 regular 111:3 regularly 44:23 relate 41:8 related 5:25	111:15 relates 2:15 relation 26:18 42:11 78:22 80:5 80:5 release 61:14 110:3 released 3:8,11 8:6 42:2 49:7 54:7 56:14 113:6 114:13 relevant 58:14 religious 102:24 rely 105:22 remain 54:17 59:2 remember 2:6,7 7:8 14:2,7,15 17:23 19:2,4,10 19:16 20:12 23:15 25:9,10,11 30:9,9,10,20 33:15 35:10,20 36:21,22,24 37:12,22,23,24 42:18,19,23,25 49:5 50:19,21 51:3 52:5,9,16,18 53:9,14,19 54:19 62:20 63:20 64:9 64:17 65:8 66:4 68:3,5,18 70:15 71:1 73:17,20 74:6 75:11,11,19 75:19 77:2 80:22 80:25 81:15 82:7 82:9,15,16,18,20 82:25 83:2,6 84:2 85:10,15,18 85:21 86:12,12 86:18 87:3,8,10 87:11,15,17,23 88:3,7 89:10 90:12,13,18,22 91:19 92:8 94:12 94:13,16,16,21 94:22 95:5,21,24 96:1,19 100:25 104:23,24 105:6 106:3,15 107:7,9
--	--	--	---	--

107:10,21 111:4 113:2,7,19,19,24 remembered 13:25 remembering 113:23 remembrance 95:5 113:22 remind 19:1 111:13 reminded 66:19 66:21 73:4,23 reminder 76:21 112:14 reminding 76:19 removal 10:9,12 11:4 15:1 25:4 26:23 27:6,21 30:5,21 41:13,22 41:23 42:21 43:14 44:11,13 44:22 45:6,22 46:6,21 49:10,11 51:24 53:5 78:16 79:15,19 108:17 108:25 remove 25:19,21 41:15 78:11,15 84:22 97:6 removed 22:24 26:10,13 77:1 81:2,3,12 82:1 106:22 109:7,12 removing 26:2 43:21 84:23 repeated 72:13 repeatedly 86:5,6 repeating 10:2 report 8:3,13 49:6 61:20 63:7 74:19 86:1 91:10,11 110:13,20 112:3 reported 49:5,8 99:10,12 reporting 3:6 61:25 62:1,3,21 98:25 99:1,4 reputation 84:19 84:20	request 105:1 requested 41:13 required 44:13 resembled 63:24 reserve 78:7 resisting 20:5 resolved 55:3 respect 18:6,7,9 respected 73:13 respond 105:2,25 response 43:9 106:19 responses 45:2 rest 36:14 46:23 restful 72:8 restrain 28:12 restrained 19:15 33:24 restraint 19:18 20:1,21 28:1 32:5 44:9 45:11 45:12,16,23,24 47:2 86:21 restraints 19:12 19:13 28:9 50:6 50:18,20,25 51:9 restricted 96:20 restriction 34:12 result 4:4,7 15:1 29:13 43:7 60:17 106:13 results 23:22 31:2 resume 115:10 resumed 94:3 return 30:13 46:17 48:20 57:20 67:9 Returned 32:5 review 32:19 33:1 43:23 79:2,10 81:16 82:2 107:13,23 109:12 reviewed 32:24 44:21 45:7 47:7 106:23 109:3 right 3:4,24 11:7 13:24 14:6 21:9 21:11 22:6,7 24:18 25:20 26:11 29:20 31:4	31:11,18 32:6,7,9 33:25 34:1,2,5 35:6 36:8 37:13 40:3,4 43:4 49:16,17,20 51:16 52:4 54:16 55:7 58:16,21 59:1,9,14,15,16 60:5,14 61:12,15 61:16 67:5 73:9 75:17 76:9 80:11 81:21 82:11 87:2 92:10,14,14,16 94:23 96:18 110:7 right-hand 47:10 rights 10:6 ring 105:25 ringing 106:1,17 riot 83:18 84:8 rise 10:17 56:16,17 67:9 93:14 risk 6:16 24:13 25:18,18,24 26:1 26:8,18 risks 45:18 rival 102:12 room 11:14,15 12:1,3,5,19 13:15 13:21 30:6 52:19 52:24 56:8,19 61:11 63:15 64:10 65:2 68:11 69:7,10,21,21,23 69:24 70:11,15 70:20 71:8,18 82:4 89:22,23,25 91:20 93:13 94:3 rooms 99:3 rotate 32:9 Rozmin 110:14 rubbish 73:22 rude 102:8 rule 37:20,25 57:4 Rules 42:7 ruling 92:25 run 109:1 runway 52:4 runways 52:8	rush 60:11 rushed 40:13,13 40:14 <hr/> S <hr/> safe 11:19 12:8,9 safeguarding 102:6 safety 10:1 102:7 sake 104:6 sanitaire 56:9 satisfied 47:1,8,23 save 91:9 saw 17:24 18:2 33:14 37:12 38:19 40:11,11 78:6,9 83:20 96:17,22 98:24 103:10 104:2 105:5 saying 1:8 7:2 9:18 12:5 17:20,21 19:10 20:8 26:7 27:4 30:20 32:11 42:13 46:10 50:10 51:3 52:7 52:12 53:9,14,19 58:2 76:9 87:24 97:9 99:25 106:17 says 2:20 11:3 26:11,18 27:1,22 30:3 33:8,18 44:20 48:3,5 80:12 85:8 94:12 94:14 96:13 97:2 scan 107:16 scared 113:10 114:7 scream 22:3 103:1 screamed 50:17,19 screaming 20:14 20:18 21:25 28:7 50:11,25 51:7 88:16,21 89:18 96:15 97:4 102:21 106:14 screen 1:21 2:9,11 8:2 24:9,12 43:2 48:25 80:3 85:23	91:8 93:23 96:3 110:12 scriptures 102:24 scrolling 78:5 sealed 107:13,23 seat 21:5 seats 21:11 second 2:19 5:12 7:14 31:17 41:14 62:2 secondly 56:8 secret 69:4 Secretary 41:21 96:8 section 25:24 63:9 95:23 sections 85:24 sector 58:16 security 17:10,18 17:19,19,25 18:3 18:6 21:12 22:7 23:13 38:7,19 49:18 see 2:16,19 5:21 6:10 8:22 12:11 12:20 15:18 18:3 19:23 23:22 24:9 24:12,16,17 25:19 26:2,10 27:15,22 29:9,14 29:17,19 30:2,3,7 31:21,23 33:6,7 33:13,14,18,23 34:21,25,25 35:3 35:9,13,15,18,24 36:5 43:2 48:1 48:15 52:9,19 54:24 56:8 58:15 60:13,25 63:4 64:22 66:24 69:9 69:11,12,14 70:13 71:2,3,3 76:3 79:17 80:11 80:12,14,18 81:18,20 83:10 84:8 88:9 90:15 94:23 95:1,4,6,8 95:8,14,16,19 96:5,22,22 97:16
--	---	---	--	---

<p>98:5 99:3 103:3 104:5,25 105:1 108:23 112:1 114:6 115:16 seeing 33:15 52:2 52:5,15 69:16 84:13 90:2,19,22 94:21 104:5 113:24 seek 114:14 sought 114:8 seen 2:13 8:13 31:21 32:1,22 33:20 34:22,23 35:18 44:17 57:6 64:5,5 65:5,6 94:6,7 97:12,24 sees 111:13 Self 6:16 self-harm 5:14 7:17 39:2 self-harming 103:2 self-isolation 84:23 send 107:14 109:5 112:5 senior 46:2,10 75:20,21 sensitive 52:21,25 sent 99:18 September 41:20 September/Octo... 110:25 series 41:6 43:16 serious 39:6,8 106:10 seriously 43:12 services 110:6 session 93:7,8,9,21 94:5 95:11 set 79:15,19 107:5 sets 27:20 settings 70:14 100:21 settled 101:12 seven 2:25 shaft 83:9,10,12 83:12</p>	<p>shapes 104:6 share 11:15 shared 11:16 12:5 70:6 102:13 sharing 12:19 13:16 61:11 100:23 shield 83:20 87:15 87:17,22 88:1,13 89:5,9,15 91:22 95:12 97:14 shields 96:14 shock 62:24 shocking 69:15 short 10:22 13:11 13:12 14:25 40:22 48:23 56:6 57:22 63:13 67:12 shorter 48:16 shortly 30:18 40:19 shouting 21:25 49:22 50:10 54:12 97:5 102:25 show 25:1 41:12 showed 47:9 78:5 shower 100:17,18 100:18,20 101:12 showering 101:2 showers 100:15,16 100:24 101:2 shown 93:9 shows 7:10 24:10 25:6 44:22 45:5 45:7 shush 22:12 shut 100:2 side 21:7,13 47:10 83:16 87:10,19 87:19 89:4 91:22 sides 20:13 sign 112:15 significant 55:6 61:7 signs 36:9 similar 34:6 simpler 99:9</p>	<p>simply 41:8 60:14 79:13 98:10,14 102:6 sink 71:13 sir 1:11,19 2:18,21 3:2,10,17,19,21 3:23,25 4:3,5 8:15 9:19 13:1 13:10,18 14:1,9 14:11,14,20 15:3 15:9,11,13,15,17 15:19,21 16:12 16:14 18:8,10,12 18:16,20,24 19:5 19:11,14,24 20:2 20:4,7,10 21:4,6 21:16,18,22,24 22:5,10,14,16,20 22:22 23:3,9,12 23:16,21,23,25 25:13,15 26:15 26:17 27:5,10 28:11,16 29:1,5,7 29:11,16 30:1,8 30:24 31:1,5,8,13 31:24 32:4,14,17 32:21 33:3,10,16 33:22 34:3,19 35:11,21 36:2 37:4,6,8,10,15,23 38:1,5,12,14,16 38:18 39:1,3,5,8 39:10,13,15,21 39:23 40:16,18 41:2,5 42:22 43:1 44:18 46:1 48:6,12,14 49:21 49:25 50:5,9,14 50:16,22,24 51:2 51:4,6,11,13,17 52:6,11,17,20 53:2,15,18,21,23 54:3,6,10,13,15 54:18,21,23 55:1 55:4,8,12,14,17 56:24 57:15 58:6 58:17,23 sit 89:17 91:2 95:13 97:15</p>	<p>sitting 89:11 90:10 situation 11:20,22 12:18 75:12 76:2 76:22,23 84:21 97:23 101:16 103:11 106:13 situations 81:24 98:23 six 2:25 3:15 11:4 16:22 17:2 61:20 63:16 84:13 87:9 sleep 31:12 35:22 72:7,7,14,14 102:25 sleeping 35:19 72:10,15 106:7 sleepless 102:2 slight 32:6 slightly 8:10 32:12 63:13 small 56:23 57:8 smell 12:1,2,3 68:15,22 69:1 100:12 smelled 103:5 smelling 68:18,23 smells 12:6 13:20 70:10 71:6 smiling 46:16 smoke 68:13,14 smoker 68:9,10,12 social 58:16 solicitor 63:6 65:23 solicitors 8:17 41:1,7 64:18 somebody 11:15 28:18 56:1,2 61:12 someone's 99:19 sorry 12:17 24:3 40:1 47:18 60:10 67:1,4 69:22 83:11 sort 4:6 5:6 107:1 sorts 74:7 sought 110:6 sound 106:23 sounds 111:14</p>	<p>space 53:17 91:7 speak 38:3,6 65:24 75:22 76:16,18 speaking 64:18 76:17,18 83:9,16 87:5 94:10 speaks 5:22 7:16 speculate 85:19 spent 12:24 spice 68:25 69:3,5 69:9 103:4,5 104:2 spilled 86:8 spite 82:2 splashing 100:20 spoke 38:7 39:11 43:25 66:4 77:12 78:1 82:19 91:20 102:8 113:16 spoken 47:15,15 sports 17:15 spot 113:15 spouse 59:3 spray 105:12 staff 15:22,23 19:7 36:5 52:14 55:20 64:16,22 66:11 69:12 73:10,13 73:19,21 74:10 75:10,20 76:12 76:13 92:18 95:12 96:21 99:3 99:23,24 105:24 106:1,6,8,8 107:18,19 108:2 stained 71:16,17 stand 57:8 Standards 42:24 43:8 48:7 109:22 standing 18:1 85:16,21 87:12 stands 28:2 start 1:8 58:2 108:24 109:1 111:10 started 28:7 49:1 49:22 50:11 51:1 91:2 109:12 110:10</p>
--	---	---	---	---

startled 113:10 starts 110:15 state 6:6 41:21 96:8 stated 44:1 46:5 statement 1:17 2:5 11:10 13:19 14:3 14:4 19:2,6,8 30:17,21 53:6,9 54:1 57:5,6 58:12,18 60:15 62:5,7,13 72:18 73:11,24 81:7 88:8,10 95:25 96:2,5,8,24 98:8 101:18 104:19 108:14 109:21 states 5:15 7:18 stating 112:12 station 28:20,22 113:8 status 3:20 55:2 stay 83:4,5,6,7,25 84:3,5,10 85:8,11 85:12 101:8 stayed 9:22 staying 70:21 84:12 90:9 103:15 step 77:12 113:7 stepped 91:5 113:6 stepping 101:12 113:8 stick 95:19 stone 58:19 stop 6:7 13:24 20:9 20:19 22:1 27:8 44:19 45:20 74:4 109:8 stopped 49:2 109:4 stories 99:17 story 20:13 104:1 105:20 straight 16:16 straps 45:13 stream 93:10 stress 4:2,6,9,10 4:18 7:1 8:23	60:16 72:18 102:20 stressed 73:2 102:1 stressful 102:22 Striking 28:18 struggled 38:2 struggling 73:2 103:13 105:7 Stuart 77:13,14,16 77:23,24 79:5 82:22,23,25 83:16,22 85:8,10 87:5 91:10,19 92:14,15,21 94:8 studying 58:20 stuff 11:25 17:11 17:13 100:9 subject 9:16 26:4 26:20 27:24,25 28:7,13,21 78:16 submissions 42:3 submit 79:1 substantive 93:8 subtitled 93:3 successful 3:22 61:15 suddenly 94:20 suffer 4:24 15:2 37:17 suffered 29:12 30:19 74:7 suffers 8:21 9:4 110:23 Sufficient 28:12 suggest 2:22 suggested 57:2,3 97:18 suggestion 97:16 suggests 25:17 30:4,6 80:7 suicidal 5:17 suicide 5:15 7:18 suitable 84:19 summarise 5:4 36:14 summarising 45:14 summary 73:12	sums 103:7 supplied 65:9,14 65:17 96:2 support 95:25 97:17 supportive 114:7 sure 1:8,12 7:24 44:17 86:11 90:14 surgery 36:5 surrounded 51:25 suspect 34:16 sustain 92:6 sustained 60:17 Swearwords 18:17 18:18 sweating 111:6 swollen 32:6,7,25 sworn 1:5,7 115:24 symptom 51:23 system 66:15,15	talks 6:13 77:6 Tascor 23:4 42:10 43:13,21 44:7 47:12 taught 114:15 tea 82:13 team 44:13 46:23 47:1 tearful 112:11 tears 21:23 technicians 93:17 telephone 44:25 45:9 tell 7:7 38:22 40:6 55:20 56:19 59:21 60:14 62:25 70:9 75:21 76:3 83:15 85:1 97:19 103:8,22 telling 17:4 22:12 33:8 54:19 76:20 83:6 85:10 89:25 104:12 105:6 tells 30:12,13 ten 80:9 tend 69:6,6 76:14 98:18 109:1 tends 69:8 108:23 109:8 terminal 28:6 terms 34:10 66:11 terrible 114:4 test 13:14 thank 1:3,13,15,23 10:20,24 40:25 48:20 56:3,4 57:13,15,17,18 57:20 58:1,6 62:9 93:18 100:10 114:23,23 114:24 115:3,5,7 115:9,16 Thanks 24:15 theirs 108:12 theme 74:9 therapies 8:24 therapy 114:9 thing 7:22 29:8 33:5 65:8 72:25	84:17 86:12 98:22,24 100:23 104:10 107:1 things 5:19 16:4 17:11 30:19 69:16 71:15 72:9 74:3,15 88:23,25 98:22 100:14 104:16 108:14 115:12 think 2:4,8 3:3 8:8 11:11 13:3,4 14:3 17:1 18:6 19:21 20:3 22:25 23:13 25:6,8,14 26:12 30:15 31:6 34:20 36:25 37:7 38:2 39:4,18,20 40:11,22 45:21 47:20 53:7 54:7 60:5,19,21 62:25 64:1,17 66:14 67:19,23 68:6,12 68:24 69:23 70:12,18 71:10 73:14,17 77:13 78:3,8,21,21,22 80:6 81:14,19 82:22 84:1 85:20 87:8,9,10,11,25 90:16 91:2,12,19 91:21 93:16 95:1 95:7,12,14 96:25 98:24 100:17,24 103:10 104:1 105:4 107:4,20 108:20 113:3 114:5,7,17,19,21 thinking 4:14 81:12,14,20 third 31:19 41:24 56:8 80:11 thought 2:22 20:19 60:22 65:21,23 79:12 113:12 thoughts 5:14,17 7:17 11:5 111:3 threatened 99:20
---	--	---	---	--

threatening 98:11 threats 98:12 three 21:11 35:2 37:2 44:12 64:24 64:25 68:8 79:17 87:9 105:4 107:8 107:22 110:16 111:6 113:1 thrown 73:5 86:23 tightened 50:25 tighter 50:18,20 time 3:15 4:21 13:7,8,11,13 14:17 18:2 19:6 22:15 36:25 39:7 39:7 40:2,15 45:19 48:10,15 48:16 54:24,25 58:13,13 60:11 62:3 64:23,23 65:5,12,19 68:2 70:16 71:3 73:5 74:4,8,12,14,20 75:1 76:7,11,16 76:17 78:19 80:6 80:9 83:19 86:16 87:18 89:11,22 91:9 97:13 99:22 105:22 106:21 108:2,6,10 111:13 112:3 times 14:16 16:19 16:22,24 17:1,3 52:23 69:8 70:24 72:5 101:11 104:22 105:23 106:11 107:19 108:21 111:6 113:19 timetable 115:14 tired 101:25 title 96:5 today 57:17 58:2 73:19 103:13,18 103:20,25 115:10 toilet 11:25 13:23 14:23 44:23 70:8 70:17,18,23 71:2 71:4,12,14 75:12	75:16,17,22,25 76:1 told 13:15,19 30:19 49:8,9,23 49:24 50:1,8 55:21 62:21 63:1 66:21 71:19 75:16 80:25 83:3 84:1 85:10,14 87:6 88:24 89:6 89:20,20 91:3,21 92:19 95:9 99:20 99:20 100:13 105:8,11,14 106:20 107:13 110:8 111:2,12 tomorrow 32:19 33:1 top 2:12,15 6:12 8:11 10:25 20:23 24:16 27:17,18 30:2 36:6 47:22 71:6 80:4,11 106:3,5 111:9 topic 56:20 57:3 57:10 torture 37:14,16 37:18 tortured 5:15 7:18 7:19,21,23 total 62:24 107:20 totality 1:22 62:8 totally 103:12 touch 32:12 train 113:8 transfer 47:6 transferred 81:17 transported 63:12 trapped 112:16,16 traumatic 112:11 traumatised 52:13 52:13 treat 73:22 treated 19:9 20:3 41:4 43:20 44:2 47:5,8 73:25 85:2 treatment 8:20 43:13 66:25	73:22 75:4 tried 6:9 22:12 27:8 45:1 71:21 78:1 103:16 triggers 111:13 trousers 77:20 true 7:22,24 29:6 50:23,24 51:5,12 97:18 truthful 46:8,15 50:15 try 39:20 53:16 66:22,22 71:21 98:23 99:23 104:17 109:1 114:15 trying 28:12 40:12 50:1 90:21 97:6 101:24 Turkish 22:19 turn 45:10 86:20 108:8,8 turned 107:2 turning 9:20 94:17 TV 111:15 113:20 twice 11:6 twist 32:9 twisting 20:17 22:2,7,9 two 10:25 11:16,17 11:24 12:5,19,24 13:16 20:13 27:17 32:6 35:2 35:17 42:1 47:11 64:10,25 65:7 85:20 87:19 89:4 93:11 96:21 100:10 104:18,20 105:3 107:19 108:3 110:18 111:6 112:5 113:1 two/three 60:21 type 114:1	uncommon 103:3 uncontrollably 51:1 understand 1:12 4:16 6:25 7:19 11:21 12:6,8,9,11 13:17 14:8 18:7 19:12 20:8 21:19 26:6,7,13 27:4,13 28:10 29:14 32:3 32:13 33:4 37:17 42:25 48:5 52:25 53:11,25 58:3 62:10 66:15 72:5 81:5 89:8 97:18 98:17,19 100:10 110:4 113:5 understanding 69:25 81:1 84:9 90:3 100:3,22 understood 6:7 28:24 29:2,4 41:16 42:12 44:19 57:13 89:24,25 97:16 Unfortunately 65:15 unhappy 12:14,15 uniform 44:14 Unit 42:24 43:8 48:7 109:22 university 58:20 unkind 18:11 unlawfully 59:11 59:12 61:8 103:20 unreliable 108:19 unsafe 11:19,20,21 11:23 15:5 unsigned 96:2,3 UoF 93:23 uphold 42:24 use 13:24 18:11 44:25 47:13 58:13 66:20 69:3 70:23,23 75:17 79:23 80:3,9,19 82:5 85:23 89:16 92:9 98:24	106:25 108:10 ushered 63:8 usual 56:21 usually 111:12 utter 102:8
V				
vantage 94:24 various 30:17 61:5 109:21 vehicle 45:7 velcro 45:13 ventilated 71:8 verbal 10:12 75:5 75:9,9 100:5 verbally 28:8 92:13,14 version 53:8 vessels 34:9 video 79:25 93:25 95:7,8,14 97:24 videos 70:13 view 96:20,22 97:10,20,22 101:16 103:25 110:8 violence 12:11,12 12:13 111:14 violent 26:5,9,12 26:16,22 27:3,7 28:8,24 87:22 88:17				
W				
waist 19:17,18,23 19:25 20:20 28:1 44:9 45:11,16,24 47:2 wait 65:4,7 94:2 waiting 64:14 104:21 wake 106:7 108:5 wakes 111:5 walk 69:8 75:21 Walk-in 24:21 walked 113:11 walking 113:10 wall 84:12,15 89:17 90:25 95:9 want 5:2 6:18				
U				
UK 49:10 103:23 unable 34:15 uncertainty 112:17				

16:25 18:21,22 20:8 21:15 25:1 25:25 27:13,15 40:3 48:8 49:7 49:13 50:10 54:8 56:11 59:18 60:2 62:18 67:7 74:15 76:18 79:22,25 80:19 84:4,18 85:4,10,11,13,19 88:3,16,24 95:22 98:2,14 100:1,8 100:14 112:24 113:14,15 114:19 wanted 85:6 87:7 88:2 90:3 wanting 76:2 wants 14:23 wasn't 16:2 18:1 19:21 30:25 70:21 73:14 77:9 78:21 81:2,2,13 88:16 91:15,23 91:23 92:11 104:23 107:15 109:15 114:14 waste 66:24 76:11 watching 113:20 water 67:5 82:16 82:17 86:7,8,13 86:23 100:18,18 100:20 101:11,13 way 3:8 9:15 10:6 12:10 15:6 21:17 36:15 44:2 56:21 59:22 63:2 70:19 73:3,7,25 76:24 87:22 90:5,6,17 90:18,19,21 92:11 97:20 99:7 106:6 107:6,7 109:4 WC 71:14 we're 99:13 wear 44:14,14 77:20 wearing 45:11 94:25 week 9:14 11:6	16:24 65:15 67:19 68:20 111:7 112:4 115:15 weekly 61:20 62:4 weeks 37:2 42:1 59:13 weighed 48:1 weight 111:21 weird 113:11 welfare 9:24 102:7 107:18,25 108:2 110:4 well-being 46:18 46:19 went 3:6 13:4 25:14 29:24 33:18 35:3,9 37:1 38:22 49:14 50:2 52:23 54:7 54:8 61:24 63:6 75:13 86:17 87:5 87:10 92:19 105:19 110:5 112:4,4,12,20 weren't 16:3 35:19 68:19 73:21 78:19 81:9 wetting 103:3 whilst 28:3,8,12 53:10,24 55:2 101:25 white 77:20 willing 46:10 105:16 wind 106:22 window 52:8 83:13 83:14 wing 12:25 13:2,3 13:4,6,8,11,12 19:7 25:7,9,11,14 30:3,7,10,13 35:7 61:11 67:2,14,15 67:16,18,20,21 67:22,23 68:1,3 68:15,16,17,18 68:19,21,22 75:14,15,15 99:23 100:15	105:10,11 106:3 Wingert 35:14 64:16 wings 67:23 69:13 wires 64:3 wishes 52:21 withdrew 57:19 115:8 witness 1:4,4,7 2:5 11:9,10 19:2 30:20 40:22 41:9 41:15,20 48:17 48:19 55:15 56:5 56:13 57:19,24 58:7 59:18 62:5 85:6 88:8 93:12 95:24 101:18 104:19 115:2,8 115:24 116:3 witness's 30:17 42:5 53:6 witnesses 115:13 woman 42:19 wonder 10:16 56:15 93:22 wondered 56:15 word 12:11 18:7 19:13 21:19 27:12 32:3 53:25 60:5 69:23 70:12 74:13 80:14 83:11 104:18,19 108:19 words 6:4 7:23 9:6 18:11,13,14,15 18:23,24 26:6 27:8 28:10 32:13 34:8,15 60:13 66:20 70:10 97:7 101:22 112:19 work 6:2 101:7 108:16 114:12 working 58:19 107:15,16 108:11 108:12,13 world 65:18 102:18 104:5 113:7 worried 10:1 83:8	86:3 worry 35:5 worse 4:22,23,23 31:15 74:20 99:10 worsened 54:2,4 worst 113:17 wouldn't 66:25 90:4,8 106:7 108:16 113:15,17 114:12 wounded 36:7 WRB 28:1 wrist 22:6,21 24:18,19 25:1 29:9,10 32:6,6,7 32:9,25 34:1,2,13 34:15 35:14,16 36:1,8 45:13,23 49:19 wrists 19:25 22:4 51:15 write 16:16 35:4 55:19,21,21,23 55:23,25 writing 43:9 75:7 75:8 76:11 written 9:10 75:5 wrong 33:7,8 35:2 86:10 96:18 wrote 33:4,23	YMCA 54:17 <hr/> Z <hr/> zombies 69:10 104:4 <hr/> 0 <hr/> 1 <hr/> 1 2:12 29:20 35:15 41:11,17 42:9 96:4 115:24 116:1 1.00 63:17 1.43 115:17 10 8:4,5 57:4 110:13 115:10,12 10.00 31:22 115:19 10.54 48:22 100 73:15 108:15 11 24:11,13 36:4 11.00/11.30 63:19 11.10 48:20 11.17 48:24 11.28 57:21 12 36:12 59:13 62:19 101:21 12.00 57:20 12.03 57:23 12.17 67:11 12.24 67:13 13 2:11 24:12 31:17 33:14 137.7(2) 93:24 137/17 80:11 14 8:9,11 36:13 15 49:1 91:10 104:17 15th 36:15 16 2:5,6,17,19,22 2:24 3:3,5,6,9 5:11 14:2 63:24 91:10 16:40 27:23 16th 2:7 36:15 17 78:10 17:10 80:9,10 17:20 28:2 18 8:8,8 10:24 18th 36:15
---	--	--	---	---

19 88:10 19th 36:15	42:5 44:6 80:3 30 23:20 24:22 30:2,6 32:24 33:14 42:1 43:10 108:4 110:21 30th 29:23 30:4 33:19 34:23 31 58:25 31st 35:13 32 76:24 78:12 33 15:23 47:21 79:14,17 34 80:21 35 37:20,25 36 8:18 37 8:25 38 10:7 49:4 39 19:1 390 61:12 80:22,23 82:4,6 85:15 87:3,21 90:12,23 97:9	7 7 35:25 47:20,20 96:10 110:12,14 110:17 74 101:22 78 40:24		
2 2 11:10 25:25 26:3 27:1 30:6 31:18 35:18,25 41:11 42:3 101:19 2.00 33:14 63:23 20 17:3 34:24 20/25 92:2 2017 2:5,17,19 3:5 8:4,5 18:25 41:20 42:1 48:11 49:6 59:12 76:24 78:14 110:25 2018 42:10 110:21 112:21 2020 3:22 101:18 2021 1:1,18 112:22 115:19 20th 36:16 23 30:18 76:24 78:14 23rd 36:16 78:11 78:23 24 2:3 11:11 36:16 59:13 61:14 24th 79:1 25 15:7 109:12 25th 36:18,19 26 42:20 43:5 79:14,19 27 25:20 26:18 41:13 43:5 27th 36:18 28 62:20 73:12,24 29 18:25 19:1,3 25:4 26:13 27:6 27:14,20 29:3,21 31:20 41:4,22 42:10,11,21 43:14 45:22 49:12 55:11 59:12 73:12 29th 31:22	4 4 8:3 27:17 95:23 95:24 4.00 72:15 40 101:1 108:7 41 88:8 45 110:18 47 111:1 48 111:9,10 49 111:9	8 8 11:10 42:5 47:18 47:20 79:17 8.00 14:12 72:6 81 53:5,7 82 53:7		
3 3 1:1,18 26:19,25 33:13 36:3 41:17	5 5 11:10 25:2 29:20 29:20 42:3,5 61:9 79:16,20,22 80:23 81:9,10 86:21 5.00 72:15 50 108:1 111:9,11 112:3 51 111:10 112:8 52 98:10 58 116:3,5	9 9 43:6 48:11 110:15,15 9.00 14:12 72:5 9.30 1:2 9.52 10:21 9.57 10:23 95 73:21		
	6 6 41:20 43:3 96:24 115:19			