

<p>1 Monday, 29 November 2021</p> <p>2 (10.00 am)</p> <p>3 MR ALTMAN: Chair, as you know, we were due to hear from</p> <p>4 Michelle Smith, who Ms Simcock was calling. Unhappily,</p> <p>5 she is unwell, and although there has been an exchange</p> <p>6 with her about the possibility of her giving her</p> <p>7 evidence remotely, which was technically doable, the</p> <p>8 assessment is that she is too unwell to give her</p> <p>9 evidence this morning, albeit, and to her credit, she</p> <p>10 was willing to soldier on. But the decision has been</p> <p>11 taken that she ought not to, in the circumstances.</p> <p>12 THE CHAIR: Okay.</p> <p>13 MR ALTMAN: Callum Tulley is the next witness. He was due</p> <p>14 to give his evidence when Ms Smith finished, which,</p> <p>15 albeit was felt to be some of the morning, not all of</p> <p>16 it, he was nonetheless programmed to be here this</p> <p>17 afternoon.</p> <p>18 He is now coming and hopefully will be here by</p> <p>19 12.00 noon. Clearly, I will need to have a conversation</p> <p>20 with him before he gives evidence, together with</p> <p>21 Mr Bunting no doubt, and so what we hope to do is to</p> <p>22 commence his evidence at 1.00 pm, instead of 2.00 pm,</p> <p>23 which will mean an earlier lunch break commencing at</p> <p>24 12.00 noon for everybody else. So if you approve that</p> <p>25 plan, that's what we propose doing.</p> <p style="text-align: center;">Page 1</p>	<p>1 A. That's correct.</p> <p>2 Q. You have been employed in that role since August 2019,</p> <p>3 19 August?</p> <p>4 A. (Witness nods).</p> <p>5 Q. Prior to which you spent a year on the Journalism</p> <p>6 Trainee Scheme based with the BBC in Scotland?</p> <p>7 A. Yes.</p> <p>8 Q. But, as we all know, formerly employed, and we will come</p> <p>9 to the circumstances in a while, by G4S, working at</p> <p>10 Brook House Immigration Removal Centre from</p> <p>11 6 January 2015 to 7 July 2017?</p> <p>12 A. That's correct.</p> <p>13 Q. Between 6 March and 17 September of that year, 2017, can</p> <p>14 you confirm you were employed by the BBC as a specialist</p> <p>15 researcher working for Panorama, the Panorama programme?</p> <p>16 A. That's true.</p> <p>17 Q. Assisting with their investigation into Brook House?</p> <p>18 A. Yes.</p> <p>19 Q. Was it during that time -- again, I will ask you some</p> <p>20 more questions about it a little later -- that you were</p> <p>21 trained in, and you subsequently undertook, secret</p> <p>22 filming and undercover reporting in Brook House, the</p> <p>23 product of which, as we know, was the programme which</p> <p>24 was aired on Monday, 4 September 2017, "Britain's</p> <p>25 Immigration Secrets"?</p> <p style="text-align: center;">Page 3</p>
<p>1 THE CHAIR: I do. I'm sorry to hear Ms Smith is unwell, but</p> <p>2 I think, in the circumstances, that makes sense, so we</p> <p>3 can reconvene at 1.00 pm.</p> <p>4 (10.10 am)</p> <p>5 (The short adjournment)</p> <p>6 (1.05 pm)</p> <p>7 MR ALTMAN: Chair, the first witness is Callum Tulley, who</p> <p>8 will either be sworn or affirmed, as the case may be.</p> <p>9 MR CALLUM MICHAEL TULLEY (affirmed)</p> <p>10 Examination by MR ALTMAN</p> <p>11 MR ALTMAN: First of all, please, your full name?</p> <p>12 A. My name is Callum Michael Tulley.</p> <p>13 Q. Mr Tulley, you made a statement to the inquiry which is</p> <p>14 dated 15 November of this year. Do you have it in front</p> <p>15 of you?</p> <p>16 A. I do.</p> <p>17 Q. Chair, if you are following this in hard copy files,</p> <p>18 it's the very first document behind tab 1, right at the</p> <p>19 start of volume 1.</p> <p>20 THE CHAIR: Thank you.</p> <p>21 MR ALTMAN: Mr Tulley, I am just looking at the introduction</p> <p>22 so that you can see where I'm going. Paragraph 1 and</p> <p>23 onwards. I'm going to ask you to tell us a little about</p> <p>24 yourself. You are now employed as a journalist by the</p> <p>25 BBC; is that right?</p> <p style="text-align: center;">Page 2</p>	<p>1 A. Yes, that's correct.</p> <p>2 MR ALTMAN: Chair, Mr Tulley has produced a number of</p> <p>3 statements and accompanying documents. I am going to</p> <p>4 ask for them to be adduced in full so that, chair, the</p> <p>5 inquiry has them as evidence in their entirety. I am</p> <p>6 just going to call out the numbers. They are the</p> <p>7 statement from which I'm now examining him, <INQ000052>;</p> <p>8 the second witness statement -- in fact, it is the</p> <p>9 second witness statement which is dated 15 November. It</p> <p>10 was the first which is, in fact, 7 October.</p> <p>11 <BBC000651>. That exhibited two documents -- first,</p> <p>12 a Word document, which responded to specific questions</p> <p>13 asked by the inquiry on 30 September of this year, which</p> <p>14 is <BBC000653> and, secondly, an Excel spreadsheet,</p> <p>15 "A Table to Key Footage" was its title, <BBC000652>.</p> <p>16 Exhibited to Mr Tulley's first witness statement was</p> <p>17 an exhibit <INQ000051>, so two witness statements and,</p> <p>18 in fact, three exhibits, CT1 is <INQ000051> and CT2 and</p> <p>19 3 are <BBC000652> and <BBC000653></p> <p>20 THE CHAIR: Thank you.</p> <p>21 MR ALTMAN: Let me ask you a little, please, about your</p> <p>22 initial employment and training with G4S and how,</p> <p>23 really, it all started. To give you the right place,</p> <p>24 I'm at paragraph 12 of your statement, which is on</p> <p>25 page 3.</p> <p style="text-align: center;">Page 4</p>

1 As you have told us, you were employed with G4S from
 2 6 January 2015. I think you spent two weeks, you
 3 believe, in the spring of 2016, working at a sister
 4 immigration removal centre to Brook House,
 5 Tinsley House?
 6 **A. Yes.**
 7 Q. Is that right?
 8 **A. That's correct.**
 9 Q. Was that because there was an outbreak of chickenpox --
 10 **A. At Brook House.**
 11 Q. -- at Brook House? You're not immune, so they sent you
 12 to Tinsley House?
 13 **A. Yes, sir, that's correct.**
 14 Q. We have not heard, and perhaps we may not hear, very
 15 much about Tinsley House, but in terms of location, was
 16 it close to Brook House?
 17 **A. Yes, sir, it's very close, maybe 300 metres down the**
 18 **road.**
 19 Q. I'm just wondering if everybody can hear, because I'm
 20 struggling a little.
 21 **A. I can bring this closer, if you like. Maybe I'll have**
 22 **to lean forward slightly.**
 23 Q. Say again, please?
 24 **A. It's about 300 metres down the road from Brook House, so**
 25 **very close, sir.**

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1 nervous and everybody will understand that. But if you
 2 see these poor ladies to your left --
 3 **A. I'm sorry.**
 4 Q. -- this one in particular, who is trying to transcribe
 5 everything you are saying, then she will start getting
 6 cross with me if I don't slow you down.
 7 **A. I apologise, I will try and be slower.**
 8 Q. So your mum found an advert?
 9 **A. Yes.**
 10 Q. Was it an online advert or a newspaper print-out?
 11 **A. Online, sir.**
 12 Q. Which was as an assistant custody officer -- where? At
 13 Brook House or the Gatwick immigration removal centre
 14 complex?
 15 **A. It was at Brook House.**
 16 Q. What did you understand that meant?
 17 **A. Initially, it was advertised as a holding facility for**
 18 **people with immigration statuses that had not been**
 19 **decided, for want of a better term; a holding facility**
 20 **for 72 hours, is what I recall it being advertised as:**
 21 **I had no idea that it was a prison and my mum would**
 22 **never have suggested I work in a prison. It seemed**
 23 **a decent salary for someone of my age leaving college**
 24 **without a university education, so we applied for the**
 25 **job online and I got an interview.**

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1 Q. So along the same perimeter road and along the Gatwick
 2 runway?
 3 **A. That is correct, sir.**
 4 Q. Now, you started as an assistant custody officer; is
 5 that correct?
 6 **A. That's correct, sir, yes.**
 7 Q. How was it you came to get the job in the first place?
 8 You deal with this, if you want to look, at your
 9 paragraphs 10 and 11, but I'm sure you remember it well.
 10 **A. My mum spotted the vacancy online. I had wanted to go**
 11 **to university to become a PE teacher and pursue my**
 12 **career in refereeing, which was going well. I was**
 13 **18 years at the time. I was refereeing**
 14 **semi-professional football. On a number of occasions,**
 15 **I was invited up to St George's Park to train with the**
 16 **next generation of young referees. My refereeing career**
 17 **was going very well but I was worried about the debt**
 18 **I would get into if I went to university to study PE, so**
 19 **I decided to just find a job and leave college. My mum**
 20 **saw the job at Brook House online, assistant custody**
 21 **officer. Initially, it was advertised not as a prison,**
 22 **but as a holding facility for people --**
 23 Q. Can I ask you, Mr Tulley, you're racing a little --
 24 **A. I'm sorry.**
 25 Q. -- and I know why you are, because I am sure you are

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1 Q. Pause there. In applying online, you say in your
 2 paragraph 11 you believe it involved you uploading a CV.
 3 **A. Yes, sir, that's correct.**
 4 Q. Then you were invited to interview. What do you recall
 5 about the interview? Paragraph 11.
 6 **A. I can't remember a great deal, if I'm honest, sir.**
 7 **I had a short meeting with a member of the SMT.**
 8 Q. Pause there.
 9 **A. Senior management team.**
 10 Q. It is not your fault. We have heard lots of acronyms.
 11 We are probably acronymed out. But that one means
 12 senior management team?
 13 **A. Yes, sir. I can't remember the name of the member of**
 14 **the senior management team who interviewed me. It was**
 15 **a short interview, at Brook House.**
 16 Q. Where in Brook House, as a matter of interest, did the
 17 interview take place?
 18 **A. In the first unit, I think. Not in the area in which**
 19 **detainees were kept.**
 20 Q. So a short interview?
 21 **A. Yes.**
 22 Q. And you get the job?
 23 **A. Yes.**
 24 Q. Now, can we have a look at some documents to begin with.
 25 You have a file there, but I'm going to try to avoid

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2 (Pages 5 to 8)

<p>1 taking you to hard copy files, because we can put these</p> <p>2 things up on screen. You provided, didn't you, and this</p> <p>3 is one of the exhibits I've already mentioned, CT1, your</p> <p>4 initials, Callum Tulley, your first exhibit, and you</p> <p>5 provided a number of documents with your first inquiry</p> <p>6 witness statement within that exhibit reference, and</p> <p>7 they include certificates and a couple of letters; is</p> <p>8 that right?</p> <p>9 A. That's right, sir.</p> <p>10 Q. Let's have a look, please, and, chair, you will find</p> <p>11 this in the very first section of your volume 1, behind</p> <p>12 divider 3. Let's put up on screen, please, and let's</p> <p>13 hope this all goes very well, <INQ000051>. I want to go</p> <p>14 to page 10 of that exhibit, so <INQ000051>, page 10.</p> <p>15 This is going to be the first of many things that you</p> <p>16 and I are going to look at together, Mr Tulley. There</p> <p>17 we are. Success.</p> <p>18 We are going to have to zoom in on that. Now, it</p> <p>19 calls itself at the top an enhanced certificate, page 1</p> <p>20 of 2. We can see at the top right "Disclosure & Barring</p> <p>21 Service", but of all the documents you provided us, this</p> <p>22 is the earliest in time, 18 November 2014. Does that</p> <p>23 give us a clue to the date when you first applied for</p> <p>24 the job?</p> <p>25 A. Yes, sir, only insofar as it was sometime before</p> <p style="text-align: center;">Page 9</p>	<p>1 G4S operated immigration removal centres. If you do use</p> <p>2 the powers of a DCO you will be personally liable for</p> <p>3 any damages that may result."</p> <p>4 Then the next paragraph is about clearance:</p> <p>5 "Unless this clearance is withdrawn by the</p> <p>6 Secretary of State, it will remain valid for six months</p> <p>7 after you cease employment ..."</p> <p>8 Was this in relation to the job you got as an ACO?</p> <p>9 A. Yes, sir.</p> <p>10 Q. What was this document telling you, as you understood</p> <p>11 it?</p> <p>12 A. My understanding is that it was giving me the clearance</p> <p>13 to work in Brook House as an ACO.</p> <p>14 Q. But not as a DCO?</p> <p>15 A. But not as a DCO and, therefore, not to have any contact</p> <p>16 with detainees.</p> <p>17 Q. Was that the major difference, as you understood it?</p> <p>18 A. It was the major difference between a DCO and ACO, yes,</p> <p>19 sir.</p> <p>20 Q. Then one other document I'll ask you to look at for the</p> <p>21 moment, which is on page 11 and begins on page 11 of</p> <p>22 the same clutch of documents. If we scroll to the top,</p> <p>23 perhaps zoom out a little, please, this is a G4S</p> <p>24 security screening booklet, and we will have seen at the</p> <p>25 bottom "Callum Michael Tulley, DCO". So later we will</p> <p style="text-align: center;">Page 11</p>
<p>1 18 November 2014.</p> <p>2 Q. We can see under the date, "Employment details",</p> <p>3 "Position applied for: Assistant custody officer child +</p> <p>4 adult work force." Name of employer is G4S Care &</p> <p>5 Justice, and so on. Enhanced certificate. So,</p> <p>6 presumably, this is a certificate that says you've got</p> <p>7 nothing adverse, in general terms, recorded against you</p> <p>8 for the DBS checks?</p> <p>9 A. Yes, sir.</p> <p>10 Q. As I say, this is the earliest document certainly,</p> <p>11 amongst the ones you provided us, which I have been able</p> <p>12 to find.</p> <p>13 Then, please, if we go within the same bundle, at</p> <p>14 the very first page where the evidence handler started</p> <p>15 in bringing up these documents, there we see the next,</p> <p>16 I think, we have in time from you. Well, not quite by</p> <p>17 about five days, but I will come to another document,</p> <p>18 which is a certificate, a little later.</p> <p>19 But this is 10 February 2015. It is the</p> <p>20 Home Office, addressed to you, subject "Clearance to</p> <p>21 work/visit at G4S operated immigration removal centres".</p> <p>22 I'm not going to read all of it in, but if we drop down</p> <p>23 three paragraphs:</p> <p>24 "You must be aware that this letter gives you no</p> <p>25 authority to act as a detainee custody officer (DCO) in</p> <p style="text-align: center;">Page 10</p>	<p>1 understand from you, and perhaps you can tell us now,</p> <p>2 that you eventually applied to become a detainee custody</p> <p>3 officer; is that right?</p> <p>4 A. That's correct, sir, yes.</p> <p>5 Q. A DCO. All right. Let's pause there for the moment and</p> <p>6 pick up the story, as it were, of your work at</p> <p>7 Brook House as an ACO, to begin with, an assistant</p> <p>8 custody officer.</p> <p>9 You had your check, your CRB check, which I think</p> <p>10 that enhanced certificate referred to. What training</p> <p>11 did you do as an ACO?</p> <p>12 A. We did two weeks' training. It was the first -- the</p> <p>13 only two weeks that we did as an ACO. We joined the</p> <p>14 DCOs, who were also training at around the same time.</p> <p>15 They were doing a six-week training course, and we</p> <p>16 joined them for the first two weeks of that training</p> <p>17 course.</p> <p>18 Q. Pausing there, please, and I'm really looking at your</p> <p>19 paragraph 14. During those first two weeks, received</p> <p>20 training in areas such as first aid and fire safety; is</p> <p>21 that right?</p> <p>22 A. That's correct, yes.</p> <p>23 Q. If we look on page 5 of the bundle that we have up on</p> <p>24 screen, first aid work, certified Callum Tulley</p> <p>25 successfully completed the following course, first aid</p> <p style="text-align: center;">Page 12</p>

<p>1 at work, held at Gatwick, 20 May 2015, certificate valid</p> <p>2 for three years. Was that one of those certificates?</p> <p>3 A. I think this was actually for my DCO, because I did the</p> <p>4 six weeks again when I became a DCO. So I think this is</p> <p>5 for the DCO.</p> <p>6 Q. So May '15, nothing to do with ACO. This one is to do</p> <p>7 with being a DCO?</p> <p>8 A. I think so, yes.</p> <p>9 Q. The other one, you say, was fire training. While we</p> <p>10 have it open, so we can be clear, let's go to the next</p> <p>11 page, page 6, please. Page 6. This should be page 5 we</p> <p>12 have open. That's first aid. The following page is the</p> <p>13 one I want. Thank you.</p> <p>14 Completed a fire marshal course, 8 June. So</p> <p>15 presumably 8 June 2015, presumably, given what you have</p> <p>16 just said, this is more likely to have been part of your</p> <p>17 training as a DCO rather than as an ACO?</p> <p>18 A. I think so, sir, yes.</p> <p>19 Q. But you did two similar courses or identical courses to</p> <p>20 become an ACO?</p> <p>21 A. I think so, to the best of my recollection.</p> <p>22 Q. Identical or similar?</p> <p>23 A. It's hard to say. It's five years ago, sir.</p> <p>24 Q. If we go to the next page, page 7, this one is</p> <p>25 definitely assistant custody officer initial training</p> <p style="text-align: center;">Page 13</p>	<p>1 Q. Pause there, Mr Tulley. Out of sync, but as you're</p> <p>2 mentioning part of the building, we will come back to</p> <p>3 it. <INQ000062>, please. This is one image. I don't</p> <p>4 know if this helps you. We can also put up <INQ000063></p> <p>5 to see if that is maybe better. Thank you. If you can</p> <p>6 keep that there.</p> <p>7 At the top of the image, Mr Tulley, you will agree,</p> <p>8 going left to right, is the perimeter road, and we</p> <p>9 should imagine, therefore, we are looking at the back of</p> <p>10 the centre and the runway is just out of picture at the</p> <p>11 top?</p> <p>12 A. That's correct, sir.</p> <p>13 Q. While we think about it, can we see Tinsley House in</p> <p>14 either of these images?</p> <p>15 A. We can't, sir, no.</p> <p>16 Q. Where would it be, looking at the left-hand image?</p> <p>17 A. Looking at the left-hand image, it would be down the</p> <p>18 perimeter road to the right.</p> <p>19 Q. To the right.</p> <p>20 A. Yes.</p> <p>21 Q. The left-hand image, for the purposes of</p> <p>22 the transcription, is <INQ000063>. As I say, I will</p> <p>23 come back to other aspects of this and I don't want to</p> <p>24 get diverted now, but you were telling us where you were</p> <p>25 permitted to work as an ACO. When you used the word</p> <p style="text-align: center;">Page 15</p>
<p>1 course, because that's what it says?</p> <p>2 A. Correct.</p> <p>3 Q. It's dated 9 February, so it's the day preceding that</p> <p>4 letter of 10 February that we saw about what you could</p> <p>5 and couldn't do as an ACO. So is that the initial</p> <p>6 training course you've been telling us about, often</p> <p>7 referred to as an ITC? That's the two-week course?</p> <p>8 A. Yes, sir, that's correct.</p> <p>9 Q. Presumably, that course finished by 9 February, you</p> <p>10 having applied at the end of 2014-ish, and you become an</p> <p>11 assistant custody officer?</p> <p>12 A. Yes, sir.</p> <p>13 Q. What were your tasks, in short? You have told us the</p> <p>14 distinction between an assistant custody officer and</p> <p>15 a detainee custody officer, but what were the tasks that</p> <p>16 that involved you doing? If you want to refresh your</p> <p>17 memory, it's paragraph 15 of your statement.</p> <p>18 A. The tasks were menial. I would sit in the gatehouse,</p> <p>19 which I know was discussed last week, but it was the</p> <p>20 building at the front of Brook House through which vans</p> <p>21 would enter with detainees and through which vans would</p> <p>22 leave with detainees. I'd sit at the gatehouse and I'd</p> <p>23 open the doors for the vans, I'd unlock the electronic</p> <p>24 doors for staff to pass through when they were trying to</p> <p>25 get through the gatehouse.</p> <p style="text-align: center;">Page 14</p>	<p>1 "gatehouse", which building, or part of the building,</p> <p>2 are you referring to in either of these images?</p> <p>3 A. If you look at the top of the image on the right --</p> <p>4 Q. Which is <INQ000062>.</p> <p>5 A. -- you will see a building -- there's a building at the</p> <p>6 top there which is kind of separate from the H, at the</p> <p>7 head of the H. That's where the gatehouse was</p> <p>8 stationed. If you look at the picture on the left, you</p> <p>9 can see to the right of the picture on the left that</p> <p>10 there is kind of a red wall.</p> <p>11 Q. Yes.</p> <p>12 A. That's the building I'm talking about. That's the</p> <p>13 building in which I was stationed most of the time, in</p> <p>14 the gatehouse.</p> <p>15 Q. So it's the one -- if we are looking at the image on the</p> <p>16 right, ending 62, it's that long building which seems to</p> <p>17 have a double roof, in effect?</p> <p>18 A. Yes, that's right.</p> <p>19 Q. It's not the -- it is not the building at the top right,</p> <p>20 that single storey building on its lonesome, as it were,</p> <p>21 right in that corner, which is also a gatehouse of kind?</p> <p>22 A. Well, sir, the building at the top right in the picture</p> <p>23 on the right-hand side is the visits centre. Sometimes</p> <p>24 I would work here as an ACO as well. You'd check in</p> <p>25 visitors for their visits, essentially, and show them to</p> <p style="text-align: center;">Page 16</p>

<p>1 the sat gate.</p> <p>2 Q. The sat gate, S-A-T?</p> <p>3 A. Yes.</p> <p>4 Q. Which is where the sat desk was?</p> <p>5 A. That's correct, sat desk or sat gate, sir.</p> <p>6 Q. Just focusing in at the moment on what I'm asking you</p> <p>7 about, we have established it is that building at the</p> <p>8 top of the image in either of the images we are looking</p> <p>9 at, or the top right in the one on the left, it's the</p> <p>10 gatehouse where you worked as an ACO?</p> <p>11 A. Yes, sir.</p> <p>12 Q. Coming back to the kind of work that you did, "mundane</p> <p>13 tasks" is what you call them in your witness statement,</p> <p>14 but what do you regard as "mundane"?</p> <p>15 A. Sitting in a chair and buzzing members of staff through</p> <p>16 doors when they pressed a buzzer at the door to alert</p> <p>17 you that they wanted to pass through it; escorting vans</p> <p>18 around to the kitchen or around to the solitary</p> <p>19 confinement block or to detainee reception. That was my</p> <p>20 work in the gatehouse. If I was working in the sat desk</p> <p>21 or at sat gate --</p> <p>22 Q. Pause there. Let's just explain some terms. You</p> <p>23 certainly mention "sat desk" in your witness statement?</p> <p>24 A. Yes.</p> <p>25 Q. "Sat gate", I'm not sure you do, but it doesn't matter.</p> <p style="text-align: center;">Page 17</p>	<p>1 A. They would show me how to --</p> <p>2 Q. Who is "they"?</p> <p>3 A. The ACOs who I shadowed. They would show me how to use</p> <p>4 the electronic doors. They would show me how I should</p> <p>5 search vans as they came into the detention centre.</p> <p>6 Q. Vans?</p> <p>7 A. Tascor vans and vans which would bring in food and other</p> <p>8 stuff. They would show me how I should search staff --</p> <p>9 not staff, sorry, visitors when visiting detainees.</p> <p>10 Although this was also covered in our training, in the</p> <p>11 initial training course. That's, to my recollection,</p> <p>12 what I was shown when shadowing.</p> <p>13 Q. Did the shadowing immediately follow on the initial</p> <p>14 training course? So you did your two weeks --</p> <p>15 A. Yes.</p> <p>16 Q. -- got your certificate in early February, second week</p> <p>17 of February, or just before, and you're shadowing</p> <p>18 thereafter immediately. How long did the shadowing</p> <p>19 last?</p> <p>20 A. One week, sir.</p> <p>21 Q. Then were you an ACO?</p> <p>22 A. Yes, sir.</p> <p>23 Q. So we should imagine that by about the middle</p> <p>24 of February, maybe a little after, of 2015, you were</p> <p>25 working at G4S as an ACO?</p> <p style="text-align: center;">Page 19</p>
<p>1 Just tell us what that means? What is a sat gate and</p> <p>2 a sat desk? What does it mean to you?</p> <p>3 A. That's just what we called it, sir. It was -- but it</p> <p>4 was somewhere where we would search through visitors on</p> <p>5 their way to the visit. It was in that -- it's in that</p> <p>6 building at the top.</p> <p>7 Q. Let's be careful. "That building at the top" can mean</p> <p>8 two things in these images. Which building at the top?</p> <p>9 A. On the right-hand side, the picture that you see, at the</p> <p>10 top of this image, it's the building which appears to</p> <p>11 have kind of two storeys.</p> <p>12 Q. Not the one in the top right-hand corner with that red</p> <p>13 on the wall?</p> <p>14 A. No, sorry, I wasn't very clear there.</p> <p>15 Q. Did it describe sat desk/sat gate because people sat</p> <p>16 there? Is that what it means or is it an acronym?</p> <p>17 A. I think it might have meant satellite gate or satellite</p> <p>18 desk, but I'm not quite sure, sir, why it's called that.</p> <p>19 Q. But that's what you understood it to be?</p> <p>20 A. Yes.</p> <p>21 Q. So those were your tasks as an ACO. Before moving on,</p> <p>22 having done your two-week initial training course as an</p> <p>23 ACO, did you shadow anyone?</p> <p>24 A. As an ACO, yes, yes, I did.</p> <p>25 Q. What did that shadowing involve?</p> <p style="text-align: center;">Page 18</p>	<p>1 A. Yes, sir.</p> <p>2 Q. There came a time, I think, when you understood that G4S</p> <p>3 was recruiting for DCOs?</p> <p>4 A. Yes, sir, that's correct.</p> <p>5 Q. For you, because of your interest in sport, did you</p> <p>6 understand that that might mean you could become an</p> <p>7 activities officer?</p> <p>8 A. Yes, sir, a member of the senior management team called</p> <p>9 Michelle Brown told me that there would be a place for</p> <p>10 me in the activities department and so I kind of took</p> <p>11 that to mean that I would be given the nod for that</p> <p>12 position, given my background in sport.</p> <p>13 Q. Did you formally apply? You talk about, for example, in</p> <p>14 paragraph 16, "at the assessment day". Was that after</p> <p>15 you had formally applied or before you made formal</p> <p>16 application?</p> <p>17 A. The assessment day was after I'd formally applied, sir.</p> <p>18 Q. The nature of the formal application, what was that?</p> <p>19 A. I can't really remember, sir, to be honest, I'm sorry.</p> <p>20 Q. Was it also similar to the --</p> <p>21 A. I think it was similar to the ACO --</p> <p>22 Q. -- ACO CV --</p> <p>23 A. -- CV upload online.</p> <p>24 Q. -- and that sort of thing?</p> <p>25 A. I think so.</p> <p style="text-align: center;">Page 20</p>

<p>1 Q. Before we come on to the assessment day, then, let's 2 just -- and the training, let's just look at some of 3 the other documents along the way. Please, can we put 4 back up on screen <INQ000051>. If we go on, please, to 5 page 11, which is what I had up on screen before, this 6 is the security screening booklet. Did you get one of 7 those for the ACO position? Because we will find that 8 this one is signed by you in several places on 5 March 9 of 2015. So presumably this was part of your 10 application to become a DCO?</p> <p>11 A. I think so, sir. It is such a long time ago.</p> <p>12 Q. If we look at the bottom, it says "Position applied for, 13 DCO"?</p> <p>14 A. Yes.</p> <p>15 Q. We can assume that you must have applied for that 16 position around that time?</p> <p>17 A. Yes, sir.</p> <p>18 Q. So you hadn't been an ACO very long, by the look of it?</p> <p>19 A. No, not long at all.</p> <p>20 Q. Maybe a month, maybe less?</p> <p>21 A. Correct.</p> <p>22 Q. Let's turn over the page because I want to ask you about 23 a few entries. "G4S Care & Justice Services. Security 24 screening policy". Under the introduction -- and if we 25 can just try and -- thank you:</p> <p style="text-align: center;">Page 21</p>	<p>1 Q. On the next page at the top, "Background": 2 "All individuals or organisations using the Criminal 3 Records Bureau (CRB) Disclosure service to help assess 4 the suitability of applicants for positions of trust and 5 who are recipients of disclosure information must comply 6 fully with the CRB Code of Practice." 7 Under the policy statement, the second bullet: 8 "We are committed to the fair treatment of its 9 staff, potential staff or users of its services, 10 regardless of race, gender, religion, sexual 11 orientation, responsibilities for dependents, age, 12 physical/mental disability or offending background." 13 At the bottom of the second column: 14 "Having a criminal record will not necessarily bar 15 you from working with us." 16 If we look, for example, at the bottom of page 16, 17 there is your name printed, your signature has been 18 labelled over, but the date is 5 March 2015. Then you 19 make a declaration on the next page, page 17. I'm 20 taking you through this, Mr Tulley, because we are going 21 to assume that everybody who applied to work as a DCO 22 had to go through the same process: 23 "Declaration form. 24 "The company prohibits the employment of staff in 25 G4S Care & Justice ... who are members of groups or</p> <p style="text-align: center;">Page 23</p>
<p>1 "G4S Care & Justice Services (UK) Limited ... 2 accepts and adopts as a minimum the security screening 3 requirements of the British standard ...", which is 4 given: 5 "Code of practice for security screening of 6 personnel employed in a security environment. 7 "Scope. 8 "This policy applies to all staff employed withing 9 Care & Justice Services ... 10 "Policy. 11 "The company will not employ persons whose history 12 indicates that they would be unlikely to resist the 13 opportunities for illicit personal gain or the 14 possibility of being compromised, or the opportunities 15 for creating any other improper breach of security, 16 which such employment might offer." 17 At the bottom: 18 "All personnel engaged in the security screening 19 process and those who have the authority to offer 20 probationary or permanent employment have high standards 21 to meet and should be aware of their responsibilities to 22 both the company and the customer." 23 Did you read all of this before signing it? Were 24 you told to read it before signing it? 25 A. I can't remember, sir, I'm sorry.</p> <p style="text-align: center;">Page 22</p>	<p>1 organisations considered to have a racist philosophy, 2 principles, aims or policies. This is in support of our 3 policy of promoting and sustaining racial equality. It 4 applies to staff who have direct contact with people in 5 our care on a regular basis whose actions may directly 6 or indirectly affect their rights, entitlements or 7 welfare. In applying for a position in these areas of 8 C&JS's business, therefore, you must complete this 9 declaration. 10 "Your certification is subject to approval by the 11 UK Borders Agency/National Offender Management 12 Service/Ministry of Justice or a UK police force. 13 Before deciding whether to agree to your appointment, we 14 require you to confirm that you are not a member of 15 the following organisations. 16 "British National Party. 17 "National Front. 18 "Combat 18. 19 "Or any group or organisation promoting racism. 20 Racism is defined, in general terms, as consisting of: 21 'conduct or words or practices which disadvantage or 22 advantage people because of their colour, culture or 23 ethnic origin. In its more subtle form it is as 24 damaging as in its overt form'. 25 Taken from the Stephen Lawrence Report. And you</p> <p style="text-align: center;">Page 24</p>

<p>1 tick, as we can see, to take it shortly, "I'm not 2 a member of any such groups", signed and dated as we 3 see. 4 Then on page 19, at the top, you are reminded of 5 your obligations under -- it is slightly off the page, 6 but under the Official Secrets Acts of 1911 and 1989, 7 and on page 24 at the top: 8 "I have signed an Official Secrets Act declaration 9 form", and that you understood the implications of 10 non-compliance, and the bullet on the right, I just want 11 to ask you about this: 12 "I do not now, or intend during the period of my 13 employment, to work for any print, broadcast or other 14 media organisation or carry out any freelance research 15 work of any nature ..." 16 Of course, at the date 5 March 2015, that was 17 probably furthest from your mind. At the time you -- 18 that changed, did you have this declaration in mind? 19 A. I didn't have the declaration in mind when that changed. 20 Q. Finally, please, the next page, 25, which is Detention 21 Services form R2, membership of prohibited 22 organisations, and this is really a declaration which 23 you signed in relation to those kinds of organisations 24 which G4S's policy prohibited its employees or anybody 25 applying to be an employee from being members of. On</p> <p style="text-align: center;">Page 25</p>	<p>1 conference room. We were in groups of five. There were 2 more than five people there. Probably about 15 to 20 3 applicants. We were divided up into about groups of 4 five, I'd say, and we were kind of given a scenario and 5 we had to resolve it. Those who were seen to be -- who 6 appeared to work well in a team obviously did well in 7 that test, if you like. It's hard to remember exactly 8 what it was. Sorry. 9 Q. I think what you do say in your statement is, it didn't 10 have any particular focus on the work you would do? 11 A. No, no. Very little -- 12 Q. So psychometric testing? 13 A. It didn't relate to Brook House, that's for sure. 14 Q. You say you were also required to undertake a medical 15 test/examination which assessed your fitness for the 16 job? 17 A. Yes, sir. 18 Q. Does that mean physical fitness? 19 A. Yeah. We spoke -- we all had, like, an individual 20 meeting with -- I think it was a doctor, or -- 21 Q. Was it a G4S doctor or some external doctor that was 22 brought in? 23 A. I'm not sure, sir, I'm sorry. It was done in a room, so 24 we weren't sort of -- it wasn't like a bleep test or we 25 didn't do any running or --</p> <p style="text-align: center;">Page 27</p>
<p>1 page 26, we can see at the top you tick the box, right 2 at the top, "I am not currently and have never been 3 a member of any group or organisation ...", so it's the 4 same declaration we saw you make earlier and, again, 5 signed 5 March. 6 So that is the nature of the policies which G4S had 7 and the sort of declarations not only that the company 8 required, but clearly were required by government 9 agencies in order to work in an establishment like 10 Brook House? 11 A. Mmm-hmm. 12 Q. Going back to your witness statement, please, the 13 assessment day, and I diverted from paragraph 16. You 14 make application. At some point, you fill out that 15 document and you sign it on 5 March. The assessment 16 day, then, is after your application, is it, but before 17 you are given the job or after you've been given the 18 job? 19 A. Before we're given the job. 20 Q. What did the assessment day involve? 21 A. It involved some group exercises to assess our -- how 22 well we worked in a team. 23 Q. Such as? 24 A. It's hard to remember exactly what it was about, but 25 I think there were five of us sat in some sort of</p> <p style="text-align: center;">Page 26</p>	<p>1 Q. For anybody who doesn't know what the bleep test is, 2 that's, what, running between two points in the least 3 time possible? 4 A. Yes, sir. It's hard to remember the -- we did some 5 balance -- you know, you're balancing on one leg, that 6 kind of stuff. It wasn't a very intense medical test, 7 as far as I was aware. 8 Q. You remembered a remember of the SMT called Michelle -- 9 was that Michelle Brown again? -- 10 A. That's correct, sir. 11 Q. -- giving you some information about Brook House. But 12 you say little information about the realities of life 13 in the centre? 14 A. Yes, sir, that's correct. 15 Q. We won't ask you now what you mean by that, but 16 presumably we will find out what you meant by "the 17 realities of life at the centre" when we get through 18 your evidence? 19 A. Yes, sir. 20 Q. You were successful and, you say, by April 2015, 21 training to become a DCO? 22 A. Yes, sir. 23 Q. Tell us about the training. You deal with this at your 24 paragraph 18. 25 A. The training involved, as we have mentioned, the fire</p> <p style="text-align: center;">Page 28</p>

<p>1 safety marshal stuff, the first aid training. We were</p> <p>2 told how we would search detainees and how we would</p> <p>3 search detainees' cells. We were told to spot the signs</p> <p>4 of efforts by detainees to condition staff.</p> <p>5 Q. Meaning?</p> <p>6 A. Meaning efforts the detainees would make to get staff to</p> <p>7 treat them favourably. We were -- we did a week-long</p> <p>8 control and restraint training at the end of the</p> <p>9 six-week training course. There was a corporation day,</p> <p>10 as there was with the ACO training.</p> <p>11 Q. Did you say "corporation day"?</p> <p>12 A. Yes.</p> <p>13 Q. What does that mean?</p> <p>14 A. It was the first day of the training and we were just</p> <p>15 told about G4S as a company, how big they were, how many</p> <p>16 countries they operated in, that kind of stuff.</p> <p>17 Q. So recapping, the training you get -- I'm simply picking</p> <p>18 this from your paragraph 18 -- searching detainees and</p> <p>19 cells, or detained persons and rooms, as we sometimes</p> <p>20 refer to them, first aid, fire safety, control and</p> <p>21 restraint, conditioning that you told us about?</p> <p>22 A. Yes, sir.</p> <p>23 Q. Diversity and inclusion?</p> <p>24 A. Yes, sir.</p> <p>25 Q. And how to deal with self-harm and suicidal ideation?</p> <p style="text-align: center;">Page 29</p>	<p>1 Q. But John Connolly is somebody we will come back to for</p> <p>2 events that took place on 17 May 2017?</p> <p>3 A. Yes, sir.</p> <p>4 Q. So that was control and restraint. What about the</p> <p>5 course in how to deal with self-harm and suicidal</p> <p>6 detainees? First of all, who provided the course?</p> <p>7 A. This course was provided by a DCM.</p> <p>8 Q. Who?</p> <p>9 A. I can't remember his name, I'm sorry. We were told how</p> <p>10 to try and identify when detainees might be feeling low.</p> <p>11 We were told about obvious signs, them explicitly</p> <p>12 telling you, other more subtle signs, like</p> <p>13 a deterioration in their physical appearance, perhaps</p> <p>14 they were refusing food and fluids, that kind of stuff.</p> <p>15 A lot of the focus was on how to prevent detainees from</p> <p>16 self-harming. If you found a detainee hanging in their</p> <p>17 cell, then you would use the fish knife which you had</p> <p>18 been provided with --</p> <p>19 Q. That was part of your kit?</p> <p>20 A. It was part of the kit.</p> <p>21 Q. We will hear from time to time about ligatures being</p> <p>22 removed from people with a knife, or a fish knife?</p> <p>23 A. Yes, fish knife.</p> <p>24 Q. That was common kit for all DCOs and DCMs, was it?</p> <p>25 A. Yes, sir, we were all issued with a fish knife. We were</p> <p style="text-align: center;">Page 31</p>
<p>1 A. Yes, sir.</p> <p>2 Q. Who gave those courses? Let's deal, first of all, with</p> <p>3 control and restraint. What level of employee of G4S</p> <p>4 provided that course to you? You said that was</p> <p>5 a week-long control and restraint?</p> <p>6 A. Yes, sir. The entire six-week course was overseen by</p> <p>7 a DCM called Peter Compton, I think.</p> <p>8 Q. Pause there. "DCM" is the detention custody manager or</p> <p>9 detainee custody manager?</p> <p>10 A. Yes, sir, detainee custody manager.</p> <p>11 Q. So that's a level above the DCO?</p> <p>12 A. Yes. The control and restraint training in particular</p> <p>13 I guess came under the oversight of Peter Compton.</p> <p>14 Q. Pause there. Peter Compton?</p> <p>15 A. I think so. Peter Compton.</p> <p>16 Q. He was a DCM?</p> <p>17 A. Yes, sir. He had overall oversight of the training.</p> <p>18 Specifically, the control and restraint training was</p> <p>19 delivered by DCOs who were restraint trainers, so they</p> <p>20 had some additional advance training in control and</p> <p>21 restraint. The DCO who had kind of overall</p> <p>22 responsibility for the control and restraint training</p> <p>23 was DCO John Connolly. He also had a couple of other</p> <p>24 DCOs working with him at various times during the week.</p> <p>25 I can't remember their names, I'm afraid.</p> <p style="text-align: center;">Page 30</p>	<p>1 given a ligature and we were taught how to use the fish</p> <p>2 knife and --</p> <p>3 Q. When you say "given a ligature", what was it made of?</p> <p>4 A. Bedsheets.</p> <p>5 Q. Bedsheets?</p> <p>6 A. Yes. We were told what to do if you walked into a cell</p> <p>7 or onto a landing and you saw a detainee was hanging</p> <p>8 from a ligature point. We were instructed to -- not to</p> <p>9 immediately sort of try and cut the ligature, but</p> <p>10 actually to support the detainee's body so that he would</p> <p>11 not be choking on the ligature. You'd wrap your arms</p> <p>12 around him and try and lift him up.</p> <p>13 Q. Support him?</p> <p>14 A. Support him, to try and preserve his life, and you'd</p> <p>15 call for help and then it would be the second DCO or</p> <p>16 manager or maybe a detainee who would try and remove the</p> <p>17 ligature. That's as far as my recollection of</p> <p>18 the self-harm and suicidal sort of prevention training</p> <p>19 takes me.</p> <p>20 Q. You told us control and restraint was a week-long course</p> <p>21 and, by "control and restraint", while I have it in</p> <p>22 mind, would that include all forms of use of force,</p> <p>23 planned and unplanned?</p> <p>24 A. Yes, sir.</p> <p>25 Q. That was a week-long course. How long was the course</p> <p style="text-align: center;">Page 32</p>

<p>1 that you have just been describing, self-harm and</p> <p>2 suicide?</p> <p>3 A. I'd be guessing, sir, if I answered that.</p> <p>4 Q. Was it a week, less than a week, more than a week?</p> <p>5 A. It certainly wasn't a week, no. It could have been</p> <p>6 a couple of days --</p> <p>7 Q. Yes.</p> <p>8 A. -- it could have been half a day. I can't quite</p> <p>9 remember, I'm sorry.</p> <p>10 Q. So that we are clear on that particular topic, the</p> <p>11 person who instructed you was a single person?</p> <p>12 A. Yes, he was a DCM.</p> <p>13 Q. A manager?</p> <p>14 A. Yes, sir.</p> <p>15 Q. No medical healthcare instruction at that point, or</p> <p>16 during that part of the course?</p> <p>17 A. Not to my recollection.</p> <p>18 Q. Did you have any healthcare instruction from any medical</p> <p>19 practitioners?</p> <p>20 A. Not in relation to self-harm and suicide attempts.</p> <p>21 I mean, we obviously did get our first aid training.</p> <p>22 Q. First aid?</p> <p>23 A. Yes. I don't recall there being anyone of a medical</p> <p>24 background being at the training regarding self-harm and</p> <p>25 suicide.</p> <p style="text-align: right;">Page 33</p>	<p>1 restraint --</p> <p>2 A. For a week.</p> <p>3 Q. -- for a week, you think?</p> <p>4 A. Yes.</p> <p>5 Q. Self-harm and suicide, maybe not even a day?</p> <p>6 A. But potentially half a week. I mean, it's just that</p> <p>7 I can't remember.</p> <p>8 Q. Let's give it half a week. What made up the rest of all</p> <p>9 that time?</p> <p>10 A. You had searching -- other than what I've said in the</p> <p>11 statement about the searching of cells, searching of</p> <p>12 detainees, the corporation day, I'm not saying there</p> <p>13 weren't any other elements to the training, it's just</p> <p>14 those are the elements of the training that I can</p> <p>15 remember. Because it was such a long time ago, it's</p> <p>16 hard to recall exactly what happened, what we talked</p> <p>17 about. I appreciate that's not particularly useful.</p> <p>18 Q. Don't worry. This training, was it all classroom based?</p> <p>19 A. Apart from the control and restraint training, yes.</p> <p>20 Q. Where was the control and restraint training?</p> <p>21 A. That was in a -- some of it was in a hall.</p> <p>22 Q. In Brook House?</p> <p>23 A. Outside of Brook House.</p> <p>24 Q. Outside?</p> <p>25 A. Somewhere in Sussex, near Crawley. Some of it was</p> <p style="text-align: right;">Page 35</p>
<p>1 Q. Had you heard -- I'm just going to ask you for now -- of</p> <p>2 the Detention Centre Rules during that training?</p> <p>3 A. Yes. Yes, sir.</p> <p>4 Q. Were you trained -- did you hear about rule 35, for</p> <p>5 example?</p> <p>6 A. It's very likely that I was told about it. I can't</p> <p>7 remember. But an emphasis was put on learning the</p> <p>8 Detention Centre Rules. So I probably did know of that</p> <p>9 rule at the time.</p> <p>10 Q. Would that have been self-learning or do you think that</p> <p>11 was instruction?</p> <p>12 A. Well, we were told about certain rules in particular by</p> <p>13 the -- but we weren't told about all of them. I can't</p> <p>14 remember if rule 35 was one of the rules we were told</p> <p>15 about or not. But we were told to read through all of</p> <p>16 the rules carefully and to try to learn all of them, if</p> <p>17 we could.</p> <p>18 Q. That would have included rules 40 and 42, for example?</p> <p>19 A. Yes, we were specifically told about those rules.</p> <p>20 Q. So about temporary association being restricted and</p> <p>21 about confinement in the block?</p> <p>22 A. Yes, sir.</p> <p>23 Q. So that was six weeks, did you say, of training?</p> <p>24 A. I'm almost certain, yes.</p> <p>25 Q. What took up the bulk of it? We have control and</p> <p style="text-align: right;">Page 34</p>	<p>1 downstairs from the training rooms, which were in that</p> <p>2 first building which we spoke about earlier, the same</p> <p>3 building that the gatehouse is in, in which there is</p> <p>4 kind of like a small exercise room -- I mean, it's not</p> <p>5 a hall, but it's sort of maybe half the size of this</p> <p>6 room, in which there was kind of padded walls, crash</p> <p>7 mats and then a mockup padded cell, and it was in that</p> <p>8 room and in that mockup cell that we would train.</p> <p>9 Q. Do you remember now offhand, just as a rough and ready</p> <p>10 figure, how many people you trained with throughout the</p> <p>11 six weeks?</p> <p>12 A. Fifteen people, perhaps.</p> <p>13 Q. Male and female?</p> <p>14 A. Yes, sir.</p> <p>15 Q. During that six weeks, were you taken around the</p> <p>16 building, the residential parts, which, as an ACO, you</p> <p>17 weren't admitted to?</p> <p>18 A. No, we weren't, actually, sir, and it was a source of</p> <p>19 frustration for people who kind of wanted to understand</p> <p>20 where they were going to be working. Because, as I've</p> <p>21 said, the jobs aren't advertised sort of as</p> <p>22 a prison-like environment where you're meeting hostility</p> <p>23 and dealing with self-harm. Obviously I had an</p> <p>24 indication of this myself because I had been an ACO, but</p> <p>25 for staff members that had just applied directly to</p> <p style="text-align: right;">Page 36</p>

<p>1 become a DCO, they were anxious to find out what it was</p> <p>2 like on the main unit because we were being taught about</p> <p>3 self-harm, we were being taught about control and</p> <p>4 restraint, and yet we didn't really have much of an</p> <p>5 insight into what Brook House was really like.</p> <p>6 Q. The realities?</p> <p>7 A. The realities, exactly. It's hard to -- it's kind of</p> <p>8 hard to -- you can't really teach in a training room</p> <p>9 what it's like, what it smells like, what it sounds</p> <p>10 like, the atmosphere. But it was only sort of --</p> <p>11 I mean, we didn't get any access to the detainee areas</p> <p>12 until the first day on the job in which we were</p> <p>13 shadowing.</p> <p>14 Q. That was my next question because you told us that you</p> <p>15 shadowed someone for a week --</p> <p>16 A. Yes, sir.</p> <p>17 Q. -- after your initial training as an ACO, or for the ACO</p> <p>18 position. What about shadowing as a DCO?</p> <p>19 A. That was a week as well, sir.</p> <p>20 Q. Did that take you inside the building, obviously?</p> <p>21 A. It did, sir, yes.</p> <p>22 Q. So after the initial training, or that six-week</p> <p>23 period -- I don't know if that's called initial training</p> <p>24 or did. Did you call that initial training?</p> <p>25 A. We referred to the first six weeks as initial training,</p> <p style="text-align: center;">Page 37</p>	<p>1 "rooms" and not "cells"? Did you understand?</p> <p>2 A. Well, they didn't tell us exactly why. We were just</p> <p>3 told, you know, that "We refer to them as rooms, not</p> <p>4 cells, and you should refer to them as such".</p> <p>5 Q. Was it because it wasn't a prison?</p> <p>6 A. Brook House is built to the standard of a category B</p> <p>7 prison. In my eyes, it is a prison. But I suppose</p> <p>8 it -- G4S were anxious to perhaps have us think that it</p> <p>9 wasn't. But, I mean, it was obvious to us that it was:</p> <p>10 Q. As far as you're concerned, despite being told that,</p> <p>11 what did you customarily refer to the rooms as?</p> <p>12 A. Well, we -- most of us referred to them as cells. Some</p> <p>13 of us would refer to them as rooms at times. They were</p> <p>14 small rooms. There was no handle on the inside of</p> <p>15 the cell door, there was no openable window, there was</p> <p>16 a toilet in the cell. I mean, they were so obviously</p> <p>17 cells that people referred to them as cells.</p> <p>18 Q. At your paragraph 19, you say that the focus of</p> <p>19 the training was the Detention Centre Rules and the use</p> <p>20 of force:</p> <p>21 "We were told clearly that force may only be used</p> <p>22 when absolutely necessary and, when it is necessary,</p> <p>23 only the least amount of force necessary should be</p> <p>24 used."</p> <p>25 A. Yes, sir.</p> <p style="text-align: center;">Page 39</p>
<p>1 but the -- once that was over, the first week was just</p> <p>2 your first week in the real job, shadowing.</p> <p>3 Q. So that was shadowing, what, DCOs?</p> <p>4 A. Yes.</p> <p>5 Q. Around the whole building?</p> <p>6 A. Not for me, no, sir. I was just shadowing in the</p> <p>7 activities department.</p> <p>8 Q. Where was the activities department?</p> <p>9 A. At that time, on the ground floor of the main unit but</p> <p>10 in a corridor which was not accessible to detainees.</p> <p>11 There was an activities office. That's where we were</p> <p>12 kind of based, where we'd meet in the morning before</p> <p>13 we'd go to our stations come the beginning of</p> <p>14 the association periods.</p> <p>15 Q. So was that -- but that's the residential block that</p> <p>16 you're talking about?</p> <p>17 A. Yes, sir.</p> <p>18 Q. Now, one of the things you say in your paragraph 18 is</p> <p>19 that during your training "we were explicitly told not</p> <p>20 to refer to the rooms in which detainees were</p> <p>21 incarcerated as 'cells'. Instead, we were told to refer</p> <p>22 to them as rooms". Who told you that and why?</p> <p>23 A. The DCMs that delivered elements of the course told us</p> <p>24 that.</p> <p>25 Q. What was the purpose behind them telling you that? Why</p> <p style="text-align: center;">Page 38</p>	<p>1 Q. Is that something that was, as it were, drummed home?</p> <p>2 A. It was, yes.</p> <p>3 Q. Did you, Callum Tulley, understand what was meant when</p> <p>4 you were told that?</p> <p>5 A. Yes, I did.</p> <p>6 Q. Was John Connolly one of those persons who told you</p> <p>7 that? Was he one of those persons who said to you,</p> <p>8 "This is what use of force means for the purposes of</p> <p>9 your position"?</p> <p>10 A. I can't remember exactly. It's like that he did tell us</p> <p>11 that because, you know, he was under the oversight of</p> <p>12 DCM Pete Compton.</p> <p>13 Q. He was one of your trainers, I thought you told us?</p> <p>14 A. Yes. I didn't think there was anything in the training</p> <p>15 or in the control and restraint training that actually</p> <p>16 was of particular concern, to be completely honest. We</p> <p>17 weren't told to use force excessively, we were told it</p> <p>18 was only to be used when necessary and, when it was</p> <p>19 necessary, the least amount of force necessary should be</p> <p>20 used. Now, I can't remember John Connolly telling us</p> <p>21 that himself, but it's likely that he was one of</p> <p>22 the people that did tell us that.</p> <p>23 Q. But it's an important principle which anybody doing</p> <p>24 their job properly as a trainer should be imparting to</p> <p>25 those who are being trained in the use of force and</p> <p style="text-align: center;">Page 40</p>

<p>1 control and restraint, isn't it?</p> <p>2 A. Yes, sir.</p> <p>3 Q. What about self-learning? You have told us about six</p> <p>4 weeks of training and then shadowing. Did you have</p> <p>5 manuals to take home with you and study at home? Did</p> <p>6 you have to take exams?</p> <p>7 A. We did some sort of exam at the end of the training.</p> <p>8 I can't remember exactly --</p> <p>9 Q. Was it a written exam?</p> <p>10 A. It was a multiple choice exam, I think. I think --</p> <p>11 I think we were given manuals, but I haven't -- I never</p> <p>12 retained copies of these, so I can't really remember</p> <p>13 what was in them.</p> <p>14 Q. Were you expected to prepare for individual courses? In</p> <p>15 other words, "Here you are, Callum, there's your manual</p> <p>16 for control and restraint. There's your manual for</p> <p>17 self-harm and suicide. Go off, learn it and we will</p> <p>18 talk about it during the class"?</p> <p>19 A. I'm sorry, sir, I --</p> <p>20 Q. You don't remember?</p> <p>21 A. I can't remember, I'm sorry.</p> <p>22 Q. Were you encouraged to continue your development after</p> <p>23 you'd done your course?</p> <p>24 A. Not as --</p> <p>25 Q. Any refresher training? Were you told to do any</p> <p style="text-align: center;">Page 41</p>	<p>1 A. It was shorter, much shorter. I think it was just</p> <p>2 a day. Obviously your initial training in C&R, control</p> <p>3 and restraint, was one week, so it was much more</p> <p>4 condensed.</p> <p>5 Q. Before I move on, then, let's just put up on screen</p> <p>6 again, please, <INQ000051>. I just want to cover off</p> <p>7 the other certificates that you have provided us with.</p> <p>8 Can we look, please, within that document, first of all,</p> <p>9 before we go to the certificates, the letter at page 2,</p> <p>10 so on the next page, this one dated 4 June:</p> <p>11 "Dear Mr Tulley."</p> <p>12 June 2015, I should say:</p> <p>13 "Dear Mr Tulley."</p> <p>14 Subject:</p> <p>15 "Detainee custody officer: certification under</p> <p>16 section 155 and 156 of the Immigration and Asylum Act</p> <p>17 1999.</p> <p>18 "This letter is to certify that the</p> <p>19 Secretary of State is satisfied that you are a fit and</p> <p>20 proper person and that you have received training to an</p> <p>21 appropriate standard for the purpose of performing</p> <p>22 custodial and in-country escorting functions in</p> <p>23 accordance with [those sections of the Act].</p> <p>24 "Your statutory powers and duties are set out in</p> <p>25 part VIII of, and schedules 11, 12 and 13, to, the</p> <p style="text-align: center;">Page 43</p>
<p>1 refresher training courses?</p> <p>2 A. There was compulsory refresher training for control and</p> <p>3 restraint.</p> <p>4 Q. Did you do one?</p> <p>5 A. Yes.</p> <p>6 Q. How long after the first one you'd done as part of your</p> <p>7 initial training as a detention custody officer?</p> <p>8 A. I don't know, sir, I'm sorry.</p> <p>9 Q. Years, months?</p> <p>10 A. Probably 12 months. My understanding was that you had</p> <p>11 to do a refresher every six or 12 months, I think.</p> <p>12 Q. Did somebody remind you or did you diarise it yourself?</p> <p>13 A. You were told, "It's time for your refresher, you need</p> <p>14 to do it again". I think there was only a certain</p> <p>15 amount of time from when you had done your control and</p> <p>16 restraint training that you were in ticket, as it was</p> <p>17 called, which would mean that you were permitted to --</p> <p>18 eventually, your training would go out of date,</p> <p>19 essentially, so --</p> <p>20 Q. It had expired, so you would have to do your refresher</p> <p>21 training?</p> <p>22 A. Yes.</p> <p>23 Q. The refresher training, such as you recall of it, was it</p> <p>24 identical to what you'd done initially or was it</p> <p>25 different, more advanced?</p> <p style="text-align: center;">Page 42</p>	<p>1 Immigration and Asylum Act ... and the Detention Centre</p> <p>2 Rules."</p> <p>3 Then you've got the duration of the certificate:</p> <p>4 "Unless your certificate is suspended or withdrawn,</p> <p>5 it will remain in force for as long as you are employed</p> <p>6 as a detainee custody officer (DCO) and have in place</p> <p>7 the required CTC ..."</p> <p>8 That's counter-terrorism check, a form of security</p> <p>9 clearance?</p> <p>10 A. Mmm-hmm.</p> <p>11 Q. " .../DBS [Disclosure and Barring Service] clearances</p> <p>12 and have completed mandatory training."</p> <p>13 Then, under the heading "Counter-terrorism check":</p> <p>14 "CTC clearance must be in place and must be renewed</p> <p>15 every 5 years."</p> <p>16 Then there is a reference under the heading</p> <p>17 "Disclosure and Barring Service":</p> <p>18 "DBS clearance must be in place and must be renewed</p> <p>19 every 5 years."</p> <p>20 In both cases, it's your responsibility to renew</p> <p>21 your CTC clearance and your DBS clearance prior to the</p> <p>22 expiry date.</p> <p>23 So that was your certificate.</p> <p>24 Over the page, please, on page 3, under the heading</p> <p>25 "Minimum training requirements", we can skip over that</p> <p style="text-align: center;">Page 44</p>

<p>1 and then "General":</p> <p>2 "You are reminded that under section 158 of</p> <p>3 the Immigration and Asylum Act 1999 a person who is, or</p> <p>4 has been, employed in pursuance of custodial functions</p> <p>5 or in-country escorting duties at a removal centre,</p> <p>6 shall be guilty of an offence if he or she discloses,</p> <p>7 other than in the course of duty or as authorised by the</p> <p>8 Secretary of State, any information that he or she</p> <p>9 acquired in the course of his or her duty and which</p> <p>10 relates to a particular detainee."</p> <p>11 What did you understand all of that to be about?</p> <p>12 A. I understood that was an instruction not to talk.</p> <p>13 Q. About detainees in particular or your work in general?</p> <p>14 A. And the environment in which they were detained.</p> <p>15 Q. Then let's just pick up some more certificates, please,</p> <p>16 on the next page. Now, as far as I can tell, this one</p> <p>17 isn't dated: level 2 award in health and safety. Is</p> <p>18 that as part of your initial training course as a DCO or</p> <p>19 after?</p> <p>20 A. It was either my training course as DCO or maybe even</p> <p>21 ACO, but it was not after -- certainly not after my</p> <p>22 training for DCO.</p> <p>23 Q. Not after your training, or could it be during the</p> <p>24 training?</p> <p>25 A. Yes, sorry, yes, during.</p> <p style="text-align: center;">Page 45</p>	<p>1 how to defend themselves.</p> <p>2 Q. We can see what it covered: guideline on the use of</p> <p>3 force; handling confrontational situations; report</p> <p>4 writing; simple breakaways. What does that mean?</p> <p>5 What's a simple breakaway?</p> <p>6 A. To try and kind of break free from being in someone's --</p> <p>7 if someone had hold of you or they had cornered you.</p> <p>8 Q. I see.</p> <p>9 A. A way of quickly escaping.</p> <p>10 Q. Defensive strikes; disarming techniques against edged</p> <p>11 weapons -- handguns -- shotguns; scenario based</p> <p>12 training?</p> <p>13 A. Yes, sir.</p> <p>14 Q. We can see at the bottom instructors, someone called</p> <p>15 Mike Trott and John Connolly?</p> <p>16 A. Yes, sir.</p> <p>17 Q. Is that the John Connolly you have been telling us</p> <p>18 about?</p> <p>19 A. Yes, sir.</p> <p>20 Q. Good. I think that's all we have to look at with that</p> <p>21 document, or that collection of documents for now. Back</p> <p>22 to your witness statement, focusing on your</p> <p>23 paragraph 20. You say, as part of your training, you</p> <p>24 were also familiarised with three key forms. There was</p> <p>25 the ACDT form, assessment care detention and teamwork</p> <p style="text-align: center;">Page 47</p>
<p>1 Q. The next page we already looked at, which was first aid</p> <p>2 at work, 20 May. So that's as a DCO?</p> <p>3 A. Yes.</p> <p>4 Q. The next one, page 6, 8 June of 2015, the fire marshal</p> <p>5 course. Skate over page 7 because we have seen that.</p> <p>6 Go to page 8, please. You have completed the DCO</p> <p>7 initial training course and that's 5 June --</p> <p>8 A. Mmm-hmm.</p> <p>9 Q. -- 2015. And page 9 -- out of sync, I'm afraid, but</p> <p>10 going slightly backwards, 5 February 2015, defensive</p> <p>11 technique course.</p> <p>12 That's 5 February.</p> <p>13 A. Yes, sir.</p> <p>14 Q. Your certification that you had completed the DCO</p> <p>15 initial training course is dated 5 June?</p> <p>16 A. Mmm-hmm.</p> <p>17 Q. So that's four months in between. What was this one</p> <p>18 that we are looking at now? Was that also part of</p> <p>19 the DCO initial training course?</p> <p>20 A. This was part of the ACO initial training course.</p> <p>21 Q. ACO?</p> <p>22 A. Yes. This isn't regarding control and restraint, but it</p> <p>23 is sort of a self-defence kind of course, so if staff</p> <p>24 found themselves in -- if ACOs found themselves in</p> <p>25 a position in which they were attacked, they would know</p> <p style="text-align: center;">Page 46</p>	<p>1 form, which was for monitoring detainees at risk of</p> <p>2 self-harm and suicide. You say you were told how to</p> <p>3 fill it in and when it was to be used and to whom</p> <p>4 a report should be made?</p> <p>5 A. Yes, sir.</p> <p>6 Q. Was that as part of the self-harm/suicidal ideation part</p> <p>7 of the course, however long that took?</p> <p>8 A. Yes, sir.</p> <p>9 Q. When you say you were familiarised, of course that's the</p> <p>10 word you're using. What does that mean to you, that you</p> <p>11 were familiarised with?</p> <p>12 A. We were talked through what the form was for, you know,</p> <p>13 how to fill it in, pages which we were entitled to fill</p> <p>14 in as DCOs, because I think there were other pages for</p> <p>15 DCMs to fill in when they were sort of assessing how at</p> <p>16 risk a detainee was with regard to self-harm or</p> <p>17 attempted suicide. So we were kind of just talked</p> <p>18 through the form, really. There wasn't a great deal to</p> <p>19 it.</p> <p>20 Q. What, to the form or to the training?</p> <p>21 A. To the form.</p> <p>22 Q. So you came away from that course thinking, "I,</p> <p>23 Callum Tulley, understand everything I have to do as</p> <p>24 regards this form if I have to complete it"?</p> <p>25 A. Yes, I felt like I knew how to open a form and who to</p> <p style="text-align: center;">Page 48</p>

12 (Pages 45 to 48)

<p>1 inform when I opened a form.</p> <p>2 Q. The second of three forms you say that you were</p> <p>3 familiarised with was use of force reports?</p> <p>4 A. Yes, sir.</p> <p>5 Q. We will see some of those later. But you say you were</p> <p>6 told, if there was any occasion on which you used force</p> <p>7 against a detained person, you had to fill one of them</p> <p>8 in?</p> <p>9 A. That's correct.</p> <p>10 Q. You were given detailed instruction on the sort of</p> <p>11 language which it was encouraged to use on the form.</p> <p>12 One example you say they used was, when you go into</p> <p>13 a control and restraint and you use the shield -- one of</p> <p>14 those big plastic, perspex jobs --</p> <p>15 A. Yes, a riot shield.</p> <p>16 Q. -- a riot shield to make contact, you do it with</p> <p>17 a certain amount of force, but you were told to record</p> <p>18 that using the words "I placed the shield onto the</p> <p>19 detainee"?</p> <p>20 A. Yes, sir.</p> <p>21 Q. Similarly, when describing restraint, you say:</p> <p>22 "We were taught that the appropriate language to use</p> <p>23 is that we were supporting the arm or supporting the</p> <p>24 head."</p> <p>25 But you add in this part of your statement that you</p> <p style="text-align: center;">Page 49</p>	<p>1 A. That's correct.</p> <p>2 Q. The shield is just one example, presumably there were</p> <p>3 examples of other uses of force which were standardised,</p> <p>4 in terms of language, in the same way, or am I wrong</p> <p>5 about that?</p> <p>6 A. You are right, sir.</p> <p>7 THE CHAIR: Mr Altman, can I just ask a quick question of</p> <p>8 clarification?</p> <p>9 MR ALTMAN: Yes, of course.</p> <p>10 THE CHAIR: Mr Tulley, do you remember the same kind of</p> <p>11 conversations happening with regard to the completion of</p> <p>12 any other different types of form, so such as the ACDT</p> <p>13 form, or is it specifically the C&R related forms that</p> <p>14 you remember?</p> <p>15 A. Specifically, the C&R forms, chair.</p> <p>16 THE CHAIR: Thank you.</p> <p>17 MR ALTMAN: The third of the three forms that you were</p> <p>18 familiarised with, to use your words, was an incident</p> <p>19 report form, sometimes referred to as an IR.</p> <p>20 A. Yes, sir.</p> <p>21 Q. You were told to fill out those when you saw a fight on</p> <p>22 the wing or a similar incident, and you were given</p> <p>23 instructions on how to complete those as well?</p> <p>24 A. Yes, sir, or an attempt to self-harm. Although this</p> <p>25 would also result in the filling out of an ACDT form.</p> <p style="text-align: center;">Page 51</p>
<p>1 want it to be clear that nobody was expressly suggesting</p> <p>2 that you shouldn't report or cover up excessive use of</p> <p>3 force. However, you felt later that these terms were</p> <p>4 sometimes used to mask the extent to which force was</p> <p>5 applied in some restraints?</p> <p>6 A. Yes, sir.</p> <p>7 Q. Are you saying, so that we are clear about what you mean</p> <p>8 here, that this was a form of cosmeticisation of what</p> <p>9 was going on or were you being given legitimate</p> <p>10 instruction in how to complete these forms?</p> <p>11 A. I'm not sure what the intention was behind the</p> <p>12 instruction -- instructors when we were told this, but,</p> <p>13 regardless of how much force was used on a detainee when</p> <p>14 using the shield, I never saw or heard of any officer</p> <p>15 using any other term than "placing the shield". So</p> <p>16 whilst, at the time, I didn't feel that we were being</p> <p>17 told to mask the extent to which force was used, I later</p> <p>18 felt that the word "placed" did not accurately describe</p> <p>19 how the use of the shield was sometimes used.</p> <p>20 Q. So it was a standard form of words, is what I'm taking</p> <p>21 from what you're saying, a standard form of words that</p> <p>22 was to be applied across the board by everybody who was</p> <p>23 trained in that way so that anybody reading the form</p> <p>24 from outside might not understand exactly what happened</p> <p>25 if all you ever had was the form to go by?</p> <p style="text-align: center;">Page 50</p>	<p>1 Q. You rather rushed that. Can you say that again?</p> <p>2 A. You'd also fill out an incident report form if you</p> <p>3 witnessed self-harm or an attempted suicide. But this</p> <p>4 would also involve the use of an ACDT form.</p> <p>5 Q. You mean if there was attempted suicide or self-harm --</p> <p>6 A. Yes, sir.</p> <p>7 Q. -- that would require an ACDT form as well as an</p> <p>8 incident report form?</p> <p>9 A. Yes, sir.</p> <p>10 Q. What about a security incident report form? Did you</p> <p>11 have anything to do with those, a SIR, as it is</p> <p>12 sometimes called, an SIR?</p> <p>13 A. It definitely rings a bell, sir, yes. Yes, the term SIR</p> <p>14 sounds familiar.</p> <p>15 Q. But anything you were instructed on at the time, or you</p> <p>16 can't remember?</p> <p>17 A. I'm sorry, I can't remember.</p> <p>18 Q. No, no, don't worry. Again, a question I asked you</p> <p>19 a little earlier: were you happy, as far as incident</p> <p>20 report forms, that you knew what you were doing when the</p> <p>21 time came to fill out one of those, whether it involved</p> <p>22 or was coupled with, or overlapped with, an ACDT form or</p> <p>23 any other kind of incident that had to be reported?</p> <p>24 A. Yes, sir, I was happy.</p> <p>25 Q. Were you equally happy -- let me ask you the question</p> <p style="text-align: center;">Page 52</p>

1 about the second of the three forms, use of force --
 2 that you knew what you were doing when the time came?
 3 **A. Yes, at the time, I was happy.**
 4 Q. That rather suggests that you weren't later?
 5 **A. In terms of the sort of language that was encouraged to**
 6 **be used, in terms of "placing the shield" and**
 7 **"supporting head", and such, I didn't feel comfortable**
 8 **with this type of language later on. At the time, I had**
 9 **no reason to believe it wasn't appropriate language to**
 10 **use in all circumstances.**
 11 MR ALTMAN: I haven't yet finished with training and other
 12 organisations you may have spoken to while you were in
 13 your training phase, but, chair, it's 2.20 pm, and
 14 perhaps we can give the transcribers a break. Can
 15 I suggest that everybody be ready, perhaps, to return at
 16 about 2.35 pm?
 17 THE CHAIR: Thank you very much.
 18 (2.20 pm)
 19 (A short break)
 20 (2.40 pm)
 21 MR ALTMAN: Mr Tulley, did you also have a talk from the
 22 Independent Monitoring Board --
 23 **A. Yes, sir.**
 24 Q. -- about their role?
 25 **A. Yes, sir.**

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1 Q. Did you remember -- I'm looking at your paragraph 21 of
 2 your witness statement -- about a couple of officers who
 3 were on your course had previously worked at
 4 HMIP Wandsworth, Her Majesty's prison Wandsworth?
 5 **A. Yes, sir.**
 6 Q. Did they tell you how they despised the IMB or how
 7 despised the IMB were at that institution?
 8 **A. Yes, sir.**
 9 Q. Were you the only person that they told about that or
 10 was it a sort of general chat among the group, that the
 11 IMB were a despised organisation?
 12 **A. Well, we were sat in -- there was kind of like a row of**
 13 **it, so it wasn't announced to the whole training course,**
 14 **but five or six officers, trainee officers, probably**
 15 **heard.**
 16 Q. What were the IMB there to do? What was their purpose
 17 in speaking to you?
 18 **A. They were there to explain their role. As I understood**
 19 **it, it was to just be some independent organisation in**
 20 **the centre that would attend certain incidents and the**
 21 **IMB assured staff that they weren't there to catch**
 22 **people out or get people sacked. That wasn't**
 23 **necessarily their exact wording, but words to that**
 24 **effect.**
 25 Q. Do you remember the training ran all day from

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1 9.00 to 5.00? You say different instructors had conduct
 2 of different parts of the course. You remember this
 3 Peter, Peter Compton, had ultimate oversight and one of
 4 the things you pick up on in your paragraph 22 is that
 5 there was some external providers and that included for
 6 first aid?
 7 **A. I think so, sir, yes.**
 8 Q. That's what you record. If you didn't get through the
 9 course, did you get the job?
 10 **A. No, you didn't. My understanding was that you would**
 11 **become an ACO.**
 12 Q. But not a DCO?
 13 **A. Correct, sir.**
 14 Q. You told us about your control and restraint training,
 15 and you told us about the room in which it was
 16 conducted, with crash mats and that sort of thing. Did
 17 you actually get kitted out in riot gear as well during
 18 that part of the training?
 19 **A. Yes, sir.**
 20 Q. So you could understand how it felt and looked to wear
 21 the gear that was required if you had to use planned
 22 force?
 23 **A. Yes, sir.**
 24 Q. Did you understand -- this is a question we have been
 25 asked to ask on behalf of Duncan Lewis Solicitors --

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1 during your training how or why detained persons might
 2 go on to the Care and Separation Unit? Was that part of
 3 the training you had for the self-harm and suicidal part
 4 of the course? Do you remember that then or did you
 5 learn about it afterwards?
 6 **A. We were told about rules 40 and 42. We didn't really**
 7 **understand why -- at least, I didn't understand why or**
 8 **when they would be applied.**
 9 Q. For vulnerable men, mentally ill men, did you understand
 10 how they would be -- apart from the things you were
 11 telling us about, how you support a man who might be
 12 hanging, how you cut a ligature from his neck and that
 13 sort of thing. But did you understand the processes by
 14 which those men were dealt with in the unit, in
 15 residential parts of the unit, why they might be taken
 16 on to E wing or care and separation?
 17 **A. The term that would be used would be they would be moved**
 18 **to solitary confinement and this was the word that was**
 19 **used, and it was "refractory behaviour".**
 20 Q. Refractory and violent behaviour?
 21 **A. Perhaps "violent" was used, yes.**
 22 Q. In terms of those men who were unwell, not just
 23 misbehaving, perhaps, or refractory, as the word is
 24 used, but those men who were genuinely ill, mentally
 25 ill, did you understand why they might be moved from the

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14 (Pages 53 to 56)

<p>1 ordinary residential wings into E wing or CSU?</p> <p>2 A. We were never told why people who were ill with,</p> <p>3 perhaps, mental health conditions would be moved into</p> <p>4 solitary confinement.</p> <p>5 Q. Let me ask you something else that I have been asked to</p> <p>6 ask: how far were staff trained on and aware of G4S's</p> <p>7 own policies? You mentioned a corporate day. I have</p> <p>8 shown you a document that you signed in several places</p> <p>9 which includes G4S policies. But, apart from that, did</p> <p>10 you understand G4S's policies?</p> <p>11 A. I wouldn't say we understood the policies. I think we</p> <p>12 were told about principles. It's been such a long time</p> <p>13 that I can't remember what those principles were.</p> <p>14 I think there were seven of them. It might have</p> <p>15 involved inclusivity and fairness, those kind of buzz</p> <p>16 words, but, apart from that, I can't remember, sorry.</p> <p>17 Q. What about the Home Office? Any policies? Were you</p> <p>18 aware of any policies that the Home Office insisted</p> <p>19 people applying for the job that you applied for needed</p> <p>20 to understand or be familiar with?</p> <p>21 A. It's very likely we were told about them at some point</p> <p>22 during the training, but just because it's been so long,</p> <p>23 I couldn't tell you what policies they were.</p> <p>24 Q. The other individuals who were on the training course</p> <p>25 with you -- you've mentioned some form of prison staff.</p> <p style="text-align: center;">Page 57</p>	<p>1 stood out."</p> <p>2 You refer to three, and I am going to ask you about</p> <p>3 them now, in this statement, in order to give context to</p> <p>4 the concerns you had which led you to contact the BBC</p> <p>5 Panorama programme.</p> <p>6 First of all, should we understand, because I will</p> <p>7 probably come back to this, that the incidents which</p> <p>8 stand out, are they the only incidents or simply</p> <p>9 representative of the kind of behaviour that you</p> <p>10 witnessed?</p> <p>11 A. They're the incidents that I remember most clearly,</p> <p>12 perhaps because I found them the most shocking. They</p> <p>13 weren't the only incidents, but because I can remember</p> <p>14 them clearly, I feel it's -- they were the most useful</p> <p>15 incidents to talk about to the inquiry, to avoid</p> <p>16 speculating about other incidents.</p> <p>17 Q. Well, the first of which you refer to in paragraph 37</p> <p>18 through to 43, and you refer to this as happening during</p> <p>19 your ACO training, so we are going right back to the</p> <p>20 early part of 2015: you don't have to repeat word for</p> <p>21 word what you say in the statement because we have the</p> <p>22 statement, and that's now adduced in evidence, so we</p> <p>23 have it all. But tell us in your own words what the</p> <p>24 first incident, as you call it, was and why it stands</p> <p>25 out?</p> <p style="text-align: center;">Page 59</p>
<p>1 Were there any others that you remember from any other</p> <p>2 backgrounds?</p> <p>3 A. There was a mix of backgrounds. There were people from</p> <p>4 Her Majesty's Prisons, people with a military</p> <p>5 background. But also people with -- graduates and</p> <p>6 I remember one member of staff worked as a call handler</p> <p>7 for the police, 999, various roles. Anyone, really.</p> <p>8 Q. And the atmosphere among the trainees? How was that?</p> <p>9 A. It was positive, it was professional, on the most part.</p> <p>10 Q. Let's, please, move on. I want to ask you now about</p> <p>11 your initial experiences at Brook House, and we will</p> <p>12 come, eventually, to your decision to contact the BBC.</p> <p>13 So that begins at your paragraph 36 and onwards.</p> <p>14 A. Yes.</p> <p>15 Q. You say at paragraph 36:</p> <p>16 "From early on in my employment at Brook House,</p> <p>17 I began to hear about and witness incidents which gave</p> <p>18 me cause for real concern."</p> <p>19 You make the point -- and you have expressed</p> <p>20 yourself in this way, really, quite often already,</p> <p>21 understandably:</p> <p>22 "This was, of course, six years ago ..."</p> <p>23 And while there were a large number of incidents</p> <p>24 which caused you concern at the time, you say:</p> <p>25 "... my memories now relate to those which really</p> <p style="text-align: center;">Page 58</p>	<p>1 A. It was in those first two weeks of my initial training</p> <p>2 as an assistant custody officer. We were sat in the</p> <p>3 training room, which was in the first building, the</p> <p>4 non-detainee building. The tables were arranged in</p> <p>5 a kind of horseshoe, rectangular-ish shape. The staff</p> <p>6 were sitting around them. I was sat at the back of</p> <p>7 the room. I had a female officer to my left, trainee</p> <p>8 officer, I had a DCO to my right called Tom Bass.</p> <p>9 Q. Tom Bass?</p> <p>10 A. Bass. To his right, there was another trainee DCO. So</p> <p>11 the four of us were sat at the back of</p> <p>12 the rectangular-shaped desks.</p> <p>13 Tom Bass was not a trainee DCO. He was a DCO who</p> <p>14 had been employed at Brook House for some time. He was</p> <p>15 on a phased return to work. It wasn't clear at the time</p> <p>16 why he was on a phased return to work, although we were</p> <p>17 later told it was because he had been suspended for</p> <p>18 using excessive force on a detainee.</p> <p>19 Q. Who told you that?</p> <p>20 A. It was said by a number of staff. The names, I couldn't</p> <p>21 recall.</p> <p>22 Q. So that we understand, did you learn this at the time</p> <p>23 that you were in this course with him or sometime</p> <p>24 afterwards?</p> <p>25 A. I learnt at the time that he was on a phased return but</p> <p style="text-align: center;">Page 60</p>

<p>1 I didn't understand why at the time. It was only later</p> <p>2 that we were told it was because of excessive use of</p> <p>3 force.</p> <p>4 Q. Why was he on the training course?</p> <p>5 A. I assumed it was because he was -- because of why he was</p> <p>6 suspended, that he was required reminding of the roles</p> <p>7 of a DCO and was, therefore, placed on the training</p> <p>8 course with us.</p> <p>9 Q. At paragraph 40, you say he was gossiping about his time</p> <p>10 at Brook House?</p> <p>11 A. Yes.</p> <p>12 Q. Tell us, really, what it was that stands out for you?</p> <p>13 A. He was telling us about -- he was gossiping about</p> <p>14 Brook House, and he was telling me about how a number of</p> <p>15 members of staff had been relieved of their duties</p> <p>16 because --</p> <p>17 Q. We will come to the "because". Relieved of their</p> <p>18 duties. A euphemism for what? What does that mean?</p> <p>19 A. I took it to mean marched off site or suspended.</p> <p>20 Q. Because?</p> <p>21 A. Because, whilst on a night shift, they stood outside the</p> <p>22 cell of a suicidal detainee, who was under constant</p> <p>23 supervision, wearing George Michael masks and they</p> <p>24 danced outside the cell whilst staring at the detainee.</p> <p>25 Q. First this: did you believe him?</p> <p style="text-align: center;">Page 61</p>	<p>1 have the bigger viewing panels?</p> <p>2 A. That's right, sir.</p> <p>3 Q. Because, otherwise, if we are just talking about a tiny</p> <p>4 window, of course the story couldn't work?</p> <p>5 A. That's right, sir.</p> <p>6 Q. But if you have a number of these officers, if he is</p> <p>7 being accurate and truthful, wearing George Michael</p> <p>8 masks, trying to scare a detainee through that great big</p> <p>9 pane, and we have seen it in videos ourselves, would</p> <p>10 that be possible and feasible?</p> <p>11 A. It would be possible in rooms 7 and 8, sir.</p> <p>12 Q. Did he give you a date for the incident?</p> <p>13 A. No.</p> <p>14 Q. Did you ever follow it up with anybody?</p> <p>15 A. When I was an ACO, I had heard the same stories from</p> <p>16 other ACOs. I'd never seen any evidence to suggest that</p> <p>17 the incident had happened, and I very much doubt they</p> <p>18 would have seen the incident happen because they were</p> <p>19 ACOs and would not have had much access to E wing.</p> <p>20 Q. By reference to paragraph 42 of your statement, did you</p> <p>21 ask Bass why the officers did that and, if so, what was</p> <p>22 his response?</p> <p>23 A. "To shit him up".</p> <p>24 Q. "To shit him up"?</p> <p>25 A. Yes.</p> <p style="text-align: center;">Page 63</p>
<p>1 A. Not really. No, I don't think so. I mean, I wasn't</p> <p>2 completely dismissive, I just didn't know what to</p> <p>3 believe. I just felt like I'd met people like him</p> <p>4 100 times before, where they sort of -- you know, I'm</p> <p>5 new, I'm young, I'm impressionable, I'm probably quite</p> <p>6 nervous about working there.</p> <p>7 Q. You were 18 at the time?</p> <p>8 A. I was 18. Maybe he was trying to, I don't know, scare</p> <p>9 me or ...</p> <p>10 Q. What was his demeanour when he was telling you this?</p> <p>11 Was he serious, was he joking?</p> <p>12 A. He was smiling, he was laughing. I mean, I had no</p> <p>13 reason not to believe him or not to believe him. I was</p> <p>14 just -- I was shocked by it. I didn't completely</p> <p>15 disbelieve him, but I also didn't -- I wasn't buying</p> <p>16 it --</p> <p>17 Q. Of course, you were young and green, if you don't mind</p> <p>18 me saying so, 18, you had no experience of life inside</p> <p>19 Brook House. But obviously there came a time when you</p> <p>20 did, and you would know where, and did clearly become</p> <p>21 aware, of where a suicidal man would have been held?</p> <p>22 A. Yes.</p> <p>23 Q. You would have had in mind E wing?</p> <p>24 A. Mmm.</p> <p>25 Q. You might also have had in mind rooms 7 and 8. Did they</p> <p style="text-align: center;">Page 62</p>	<p>1 Q. By which you understood, what?</p> <p>2 A. To scare him or to freak him out.</p> <p>3 Q. You think the conversation took place in</p> <p>4 about January 2015?</p> <p>5 A. I think so, sir.</p> <p>6 Q. And you say that you remembered feeling uncomfortable</p> <p>7 about what he told you and hoped there may not have been</p> <p>8 truth in it because he was just trying to show off?</p> <p>9 A. Yes, sir.</p> <p>10 Q. But, as you say, you heard the story, it came around</p> <p>11 from another source?</p> <p>12 A. It was a rumour, yes.</p> <p>13 Q. So that was incident one. The second incident you deal</p> <p>14 with at your paragraphs 44 to 62?</p> <p>15 A. Yes, sir.</p> <p>16 Q. Tell us about the second one, please, because this one</p> <p>17 involved you.</p> <p>18 A. Yes, this was something I witnessed myself. I was an</p> <p>19 ACO still, 18 at the time. I was working in the</p> <p>20 gatehouse and a van, Tascor van, arrived to pick up</p> <p>21 a detainee.</p> <p>22 Q. Just pause there. Sorry to interrupt every now and</p> <p>23 then, but it is just really to help understand some of</p> <p>24 the terms and names you're using. Tascor. Who are</p> <p>25 Tascor?</p> <p style="text-align: center;">Page 64</p>

<p>1 A. They're the company that are contracted to escort 2 detainees to airports, to other prisons, to other 3 detention centres. 4 Q. So they're the escorting, one of the escorting, services 5 used by the Home Office -- 6 A. Yes, sir. 7 Q. -- to escort prisoners or detained men? 8 A. Correct, sir. 9 Q. Sorry to interrupt. 10 A. The Tascor van arrived. I was working at the gatehouse. 11 It came to pick up a detainee who was refusing to leave 12 the detention centre. As such, he was being held in 13 solitary confinement at the back of E wing, in what we 14 called "the block". The Home Office referred to it as 15 CSU or the Care and Separation Unit. I buzzed the van 16 in, checked the underside of the van -- 17 Q. Slow down a bit. 18 A. -- with a mirror. I checked inside the van to make sure 19 nothing -- no contraband was being smuggled into the 20 centre. 21 I then buzzed the van through the second gate and 22 I escorted the van to the solitary confinement block. 23 To do this, I had to sort of go around -- there was like 24 a mini perimeter road that would go around the detention 25 centre. It was inside of the razor-wire fencing.</p> <p style="text-align: center;">Page 65</p>	<p>1 on the right-hand image, which is the one ending 63, you 2 can make out, at the end of the orange building, some 3 blue, I think. 4 A. Yes. 5 Q. We are sort of missing -- we can just make out some red 6 at the end of the block that starts green? 7 A. Yes, sir. 8 Q. For our purposes just now, where was the E wing? 9 A. E wing is at the back of the detention centre on the 10 right where the green is. 11 Q. Green. So help us. You were -- we will keep these 12 images up, because it will help us visualise what you 13 are telling us. So the van comes in at the front. 14 A. Yes, sir. 15 Q. The gatehouse is the building right at the top? 16 A. Yes, sir. 17 Q. That's where you're working? 18 A. That's where I'm working. 19 Q. The van, did you say, has to come through the gate and 20 then there's a second gate? 21 A. Yes, sir. So if you look at the picture on the left, 22 and you look at the first building at the top of 23 the picture. 24 Q. The one which seems to have two roofs on it? 25 A. Yes. You can slightly make out, on the bottom left of</p> <p style="text-align: center;">Page 67</p>
<p>1 Q. Pause there. Let's see if we can bring up one of those 2 or both of those images again, <INQ000062> and 3 <INQ000063>, please. 4 Does this one help, Mr Tulley? 5 A. It helps a little bit. You can see, if you look at each 6 of the wings of the H on the left -- 7 Q. What colours? 8 A. If you look at the orange on the left and the green on 9 the right, keep looking at the left picture, the picture 10 on the left, you can see -- just to the right of 11 the green wing and to the left of the orange wing, you 12 can just see there is sort of a wide enough space 13 between the wings and the razor-wire fencing for 14 a vehicle to pass through. 15 Q. So those are -- the fences are sort of on the perimeter 16 of the long parts of the H shape in both cases, both 17 sides. Is that what you're talking about? 18 A. Yes, around the outside. There is a small perimeter 19 road that's going around the detention centre and then 20 there is -- 21 Q. Like part of a square? 22 A. Yes, sir. 23 Q. While we are looking at it -- as I say, I will come back 24 to aspects of the layout later, but colour coding. We 25 have got the green, we have got orange, and if you look</p> <p style="text-align: center;">Page 66</p>	<p>1 that building and the bottom right of that building, 2 there are kind of brown -- two big brown gates. 3 Q. Yes. 4 A. So if we look at the brown gates on the left, you can 5 only see about a third of it. That is the gates through 6 which I buzzed the Tascor van. 7 Q. So it comes through there. Where does the van travel to 8 get to E wing to pick up the detained man? 9 A. It comes out of that gate and turns right. To us it's 10 left. It goes around the perimeter road, the small 11 perimeter road. It goes past the back of delta -- 12 D wing, which is the orange thing -- the orange wing 13 that you see at the bottom left. It goes along the back 14 of the building where it arrives at the back of 15 the green wing. 16 Q. E wing? 17 A. E wing, yes. 18 Q. So, somewhere there, there is an exit from E wing where 19 the detained man who is on E wing could be put into 20 a van. Do we understand that that's the same -- we will 21 have it in mind for all of the wings, that if a detained 22 man is being picked up from, say, A or C or D wings, 23 they would be picked up in different parts of 24 the estate? 25 A. Technically, that could happen in practice, but --</p> <p style="text-align: center;">Page 68</p>

1 because there is an exit to each wing at the base of
2 the wing, just as there is with E wing. But if
3 a detainee was refusing to leave, then he would be most
4 likely moved to E wing or solitary confinement. And so,
5 if a detainee was residing on C wing, B wing, A wing or
6 D wing, and they were to be removed, they would either
7 just leave voluntarily, and so they would leave through
8 discharge, which was detainee reception, or they would
9 leave -- or they would refuse to leave and they'd be
10 moved to CSU or the E wing.

11 Q. So in the case of a detained man who it was thought
12 would refuse, and continue to refuse, to leave and,
13 therefore, fail to co-operate, if he found himself on
14 E wing, that's where the Tascor van would go in order to
15 perhaps reduce the distance between the van --

16 A. Yes.

17 Q. -- and the person rather than he be discharged perhaps
18 in a way he might otherwise be if he was co-operating?

19 A. Yes, sir.

20 Q. So we have got the van. Did you follow the van around?

21 A. Yes, I kind of -- I think I followed it behind or I may
22 have been walking in front. I think I was behind the
23 van.

24 Q. Tell us then what happened, now we can visualise where
25 you are.

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1 his body, a comment was made about his penis. The staff
2 started laughing.

3 Q. Was it some of them or all of them who were laughing?

4 A. Some of them were making comments. All of them were
5 laughing.

6 Q. You said, of these five, some were managers. How many
7 were managers amongst these officers?

8 A. So there were at least two DCMs and there were at least
9 five people and there could have been more.

10 Q. How was he reacting to the laughing and mocking?

11 A. He was clearly distressed and upset. I mean, he was
12 just -- I mean, you can imagine. You're stood naked in
13 front of five blokes. They're laughing at you. They're
14 taking the mick out of you. I mean, he was completely
15 humiliated. He was just clearly distressed. He was --
16 I mean, not only did he want to be removed from the
17 centre, but his clothes had been either removed or -- to
18 be honest, I didn't see how or why his clothes were --
19 why they were removed, so I guess it's technically
20 possible that he removed them himself, but I don't see
21 why he would have done that.

22 Q. Forgive me, you said he was either inside or outside the
23 cell. So that suggests the cell or the room door was
24 open?

25 A. Yes, the cell door was open.

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1 A. So we arrive at E wing, the back of E wing, which is
2 actually the solitary confinement block, and we --
3 I press the buzzer on the electronic door. I show my
4 pass. Someone in the control room lets us through.

5 Q. Pause there. Control room. Is that in the gatehouse?

6 A. No, that's on the second floor of the first building
7 above the gatehouse.

8 Q. That controls all the CCTV, all of the exits, entrances,
9 and that sort of thing?

10 A. Yes, sir.

11 Q. And monitors them, presumably?

12 A. Yes, sir.

13 Q. Sorry. Carry on.

14 A. We get buzzed through the electronic door. I show the
15 Tascor members of staff through the door. They don't
16 have keys, which is why I'm escorting them. I then use
17 my own keys to go through another locked door, which
18 takes us directly onto the solitary confinement block.

19 When we get onto the block, there is a -- I think
20 outside cell 5, either just outside cell 5 or inside
21 cell 5, there's a detainee who appears to be of
22 Middle Eastern descent. He is completely naked and
23 there are about five or six members of staff stood
24 around him. Some of them are managers, some of them are
25 DCOs. They are laughing at him, making comments about

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1 Q. Was he standing or on the floor?

2 A. He was standing.

3 Q. Just, what, standing just, as it were, still, or was he
4 moving around? Do you remember now?

5 A. He was stood still. There was -- what I can remember
6 is, he was stood still, he was naked, there were five to
7 six members of staff stood around him. They were
8 laughing at him. They were making snide comments,
9 including about his body. He was clearly distressed.
10 He was upset. It was just -- it was shocking to see.
11 I mean, I was 18. I'd just stepped onto the wing, never
12 been in solitary confinement before. The smell of
13 disinfectant and urine is most prevalent in the solitary
14 confinement block. It was just like -- it was -- it's
15 sort of seared into my memory, just stepping into such
16 a bleak and depressing situation in which -- I still
17 kind of struggle to understand why he was -- why they
18 were doing what they were doing.

19 He was just a -- he was a defenceless detainee.

20 I just could not understand why he was being treated in
21 the way he was being treated.

22 Q. Now, you say he was there because, as you understood it,
23 he was failing to co-operate, failing to --

24 A. Yes, he didn't want to leave -- I think he was being
25 deported. I'm not --

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18 (Pages 69 to 72)

1 Q. Did he manifest his failure to co-operate in front of
 2 you? In other words, you say he was standing still, but
 3 was he reacting to the idea, because you were there to
 4 escort him to the van?
 5 **A. He was begging not to be removed. He was begging for**
 6 **them to let him stay. He was repeatedly being told that**
 7 **he was being removed. He was saying, "Please, please",**
 8 **you know, not much -- his English wasn't great. There**
 9 **was just lots of "pleases", crying.**
 10 Q. Was he given any clothes at any time or any part --
 11 **A. Yes.**
 12 Q. Any type of clothing?
 13 **A. Yes, he was given some boxer shorts.**
 14 Q. Was any force applied to him?
 15 **A. Handcuffs were applied to him.**
 16 Q. Why was that?
 17 **A. I don't know.**
 18 Q. How were the handcuffs applied -- in front of his body
 19 or behind him?
 20 **A. Behind him.**
 21 Q. Were they applied in front of you or by the time you got
 22 there was he already handcuffed?
 23 **A. No, they were applied in front of me.**
 24 Q. What was he doing to warrant handcuffs being applied?
 25 Was he being violent or physically threatening?

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1 **A. He wasn't being violent or physically threatening. He**
 2 **wasn't leaving. He was refusing to go.**
 3 Q. Yes.
 4 **A. So he was handcuffed.**
 5 Q. When he was handcuffed, did he resist?
 6 **A. Not in a violent manner. I mean, he was so desperate to**
 7 **stay that he was sort of begging and -- you know when,**
 8 **kind of, people protest and they don't resist but they**
 9 **also don't co-operate. A bit like the Insulate Britain**
 10 **protesters that lie in the roads. I mean, he wasn't,**
 11 **like, lying down, but he wasn't allowing himself to**
 12 **be -- he wasn't going compliantly. He just wasn't --**
 13 **but he wasn't kind of being violent, or ...**
 14 Q. You say in your statement, at paragraph 52, that one of
 15 the reasons he might have been naked is because he'd
 16 been strip searched?
 17 **A. It's possible.**
 18 Q. Would a strip search involve the man being entirely
 19 naked?
 20 **A. Yes, sir.**
 21 Q. Right.
 22 **A. I think it was referred to as "a full search", is the**
 23 **correct term.**
 24 Q. So after that, he's handcuffed, naked but for a pair of
 25 shorts?

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1 **A. Yes.**
 2 Q. Was he taken to the van?
 3 **A. Yes, sir.**
 4 Q. Who took him to the van?
 5 **A. The Tascor team.**
 6 Q. You went with them?
 7 **A. Yes, sir.**
 8 Q. So, what, the Tascor team comes in --
 9 **A. Yes.**
 10 Q. -- at that point?
 11 **A. Yes.**
 12 Q. But were they in at the point at which the officers were
 13 laughing and mocking him?
 14 **A. They were still at the door. They were still at the**
 15 **door through which I had shown them.**
 16 Q. Yes.
 17 **A. They would wait at the door.**
 18 Q. Outside or inside?
 19 **A. Inside --**
 20 Q. Yes.
 21 **A. -- with the cell in sight. So they could have seen --**
 22 **I mean, the block is not that big.**
 23 Q. No.
 24 **A. So they would have seen and heard the abuse.**
 25 Q. Is it at the end of the -- forgive me, is it at the

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1 end -- there is a sort of gate, looks like a sort of
 2 prison gate --
 3 **A. Yes.**
 4 Q. -- with bars. Is that the door that you're talking
 5 about?
 6 **A. No. That door will lead you on to E wing.**
 7 Q. I see.
 8 **A. Because we have gone -- so E wing is where detainees are**
 9 **removed from association but they are not held in**
 10 **solitary confinement. They can't leave the wing and**
 11 **associate with the rest of the population. There are**
 12 **a number of reasons why they are put on the wing. But**
 13 **they can leave their cells, play pool, go to the wing**
 14 **office --**
 15 Q. Yes.
 16 **A. -- eat dinner at the tables. At the end of E wing is**
 17 **the prison gate you're referring to.**
 18 Q. Right, okay.
 19 **A. There's the prison gate and then immediately behind it**
 20 **is a locked door, so you have to pass through them both**
 21 **with a lock and key.**
 22 **Once you pass through them both, you're onto the**
 23 **block where people are held in solitary confinement.**
 24 Q. CSU?
 25 **A. CSU. If you were to pass through those two doors,**

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19 (Pages 73 to 76)

<p>1 immediately to your right is the cell in which the</p> <p>2 detainee was stood at. But obviously I had entered</p> <p>3 through the rear of the block, so I had come from the</p> <p>4 other side. When I entered the block, everything was</p> <p>5 happening to my left, in the corner. But the Tascor van</p> <p>6 members of staff were stood at the entrance to the rear,</p> <p>7 the rear entrance door.</p> <p>8 Q. I see. So they were in a position to witness what was</p> <p>9 going on?</p> <p>10 A. Yes, sir.</p> <p>11 Q. In terms of distance, just so we get an idea, how far</p> <p>12 away were they from what was going on? Use anything in</p> <p>13 this hearing room?</p> <p>14 A. Ten yards. Between me and the wall over there.</p> <p>15 Q. You're look at the back wall behind me?</p> <p>16 A. The back wall behind you.</p> <p>17 Q. So this man was eventually taken down to the van; is</p> <p>18 that right?</p> <p>19 A. Yes, sir.</p> <p>20 Q. You say it concerned you. Did you raise a concern about</p> <p>21 it?</p> <p>22 A. No, sir.</p> <p>23 Q. Because ...?</p> <p>24 A. I was 18 at the time and during our training we were</p> <p>25 told we could raise our concerns to DCMs in the first</p> <p style="text-align: center;">Page 77</p>	<p>1 A. We were never told about whistleblowing in terms of</p> <p>2 a confidential whistleblowing line. We were told if we</p> <p>3 had concerns about the treatment of detainees, we could</p> <p>4 raise them to DCMs.</p> <p>5 Q. Who told you that?</p> <p>6 A. Pete Compton told us that.</p> <p>7 Q. During the training?</p> <p>8 A. During the training.</p> <p>9 Q. So here you were in a situation, as you say, where DCMs</p> <p>10 were involved in the conduct?</p> <p>11 A. Essentially, I was -- if I were to follow my training,</p> <p>12 I was to complain to the very people that were abusing</p> <p>13 the detainees.</p> <p>14 Q. Were you aware of posters around the please, "Speak Out"</p> <p>15 posters that you mention in your paragraph 58?</p> <p>16 A. Not at this point, no. I became aware of them later on.</p> <p>17 As I've said in my statement, these had the words</p> <p>18 "snitches" and "grass" and "don't be a rat" written</p> <p>19 across them.</p> <p>20 Q. They were in the staff toilets?</p> <p>21 A. Opposite the detainee shop. But it was not accessible</p> <p>22 to detainees, only to staff.</p> <p>23 Q. But the whistleblowing policy was directed to staff not</p> <p>24 to detainees, presumably?</p> <p>25 A. Yes, sir.</p> <p style="text-align: center;">Page 79</p>
<p>1 instance. DCMs were participating in the abuse. So</p> <p>2 I was -- I had no confidence that going to DCMs would be</p> <p>3 anything other than fruitless. So I didn't speak to</p> <p>4 anyone about it. We were not told in our training about</p> <p>5 this so-called whistleblowing line, which I only learnt</p> <p>6 about in early 2016.</p> <p>7 Q. I was going to ask, because you deal with that as part</p> <p>8 of your statement.</p> <p>9 A. Yes.</p> <p>10 Q. So you learned about the whistleblowing helpline --</p> <p>11 A. Yes, sir.</p> <p>12 Q. -- when did you say, in --</p> <p>13 A. 2016.</p> <p>14 Q. -- 2016?</p> <p>15 A. I only learned about the whistleblowing helpline in the</p> <p>16 aftermath of another Panorama programme, called "Teenage</p> <p>17 Prison Abuse Exposed", in which children were -- young</p> <p>18 offenders were being secretly filmed in another G4S</p> <p>19 institution being abused. And it was in the aftermath</p> <p>20 of that that G4S alerted staff to this whistleblowing</p> <p>21 line.</p> <p>22 Q. When I asked you earlier about any G4S policies you</p> <p>23 might have been trained on, corporate day, how certain</p> <p>24 are you that the whistleblowing policy wasn't part of</p> <p>25 it?</p> <p style="text-align: center;">Page 78</p>	<p>1 Q. So we are clear, at this point in time, all you</p> <p>2 understood was, if you had a complaint, you take it to</p> <p>3 a DCM?</p> <p>4 A. Yes, sir.</p> <p>5 Q. But your evidence is that you had not heard about the</p> <p>6 G4S whistleblowing policy until --</p> <p>7 A. Much later.</p> <p>8 Q. -- much later? And, equally, you weren't aware of</p> <p>9 the "Speak Out" posters until later?</p> <p>10 A. Much later, sir, yes.</p> <p>11 Q. That's because you were an ACO, presumably, so you</p> <p>12 didn't have access to where these posters were, or is</p> <p>13 that wrong?</p> <p>14 A. As an ACO, I would sometimes go to the gym when</p> <p>15 detainees were locked in their cells. So I -- I mean,</p> <p>16 I could access different parts of the centre. I just</p> <p>17 wasn't really meant to be there. But in terms of</p> <p>18 the gym, I was entitled to go there in my breaks and</p> <p>19 that was near where some of these posters were.</p> <p>20 Q. Are you saying it was only afterwards that you saw them</p> <p>21 for the first time?</p> <p>22 A. Yes.</p> <p>23 Q. One of the things I would also like to ask you is this,</p> <p>24 while we are on it: you mentioned the Medway programme?</p> <p>25 A. Yes, sir.</p> <p style="text-align: center;">Page 80</p>

1 Q. Was anything ever said to you about journalists working
2 at Brook House?
3 **A. Yes, sir.**
4 Q. What was said?
5 **A. We were told to be aware of journalists working within**
6 **the detention centre.**
7 Q. Was that when you were an ACO or a DCO?
8 **A. This was when I was a DCO.**
9 Q. Who told you that?
10 **A. After this Panorama was broadcast --**
11 Q. That's the Medway one?
12 **A. The "Teenage Prison Abuse Exposed" --**
13 Q. Let's just fix that in time. When do you think that
14 was?
15 **A. I think this is around 11 or 12 January 2016. At that**
16 **point, either on the 11th or on the 12th, I was writing**
17 **up my resignation letter to leave Brook House because**
18 **I couldn't cope with what I was seeing. I was sick of**
19 **it. I mean, I'd stayed in the job for a year not**
20 **because I particularly wanted to, but because I was**
21 **worried about unemployment. But a year in, I'd become**
22 **so sick of the job that I'd just decided I would quit.**
23 **I was sat at home. I was writing my resignation letter.**
24 **As I said, I never felt I could complain internally**
25 **about the abuse that I had witnessed at Brook House. So**

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1 I had decided that I would leave.
2 Whilst I was writing my resignation letter, the
3 "Panorama: Teenage Prison Abuse Exposed" started
4 playing. This was either on 11 or 12 January. I was
5 watching staff members who wore the same uniform as me,
6 in a custodial setting, abusing people in their care.
7 It was -- it reminded me of the things that I had
8 witnessed at Brook House.
9 I formed the view that the only way of holding the
10 G4S, the Home Office and individuals to account for the
11 abuse that was exacted upon detainees was to contact
12 Panorama in the hope that they might send in one of
13 their own undercover reporters and that they would make
14 a similar film about Brook House and that there would be
15 similar cause for change. So I deleted my resignation
16 letter to G4S and instead emailed BBC Panorama.
17 Q. We will come to that in a second. When you say you
18 deleted the letter, was that the letter that you had
19 created on a computer?
20 **A. I was typing it on my laptop, yes.**
21 Q. When you say deleted it, deleted it from your --
22 **A. Well, I just -- you know, I just deleted what was on the**
23 **page.**
24 Q. So it doesn't exist anymore in draft or anything like
25 that?

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1 **A. No.**
2 Q. So you've dealt with two incidents so far which had got
3 you this far. So that we can understand, because we
4 have slightly moved on, as you had in your statement,
5 you're talking about the Medway programme --
6 **A. Yes.**
7 Q. -- which was between 11 and 12 January 2016. How long
8 before that was the incident you were telling us about
9 with the naked man on E wing?
10 **A. Probably about nine months.**
11 Q. So quite some distance before?
12 **A. Yes, sir, because this was in my time as an ACO. I was**
13 **only an ACO for about a month.**
14 Q. We know you become a DCO around March time of 2015, or
15 thereabouts?
16 **A. Yes, sir.**
17 Q. Or certainly gone through the training around that time.
18 So that was that particular instance. Help us with
19 this: that particular incident took place when you were
20 an ACO. Why, having seen that particular incident you
21 just told us about -- you've got the Tom Bass thing.
22 That was the first one. The second thing is this
23 incident, nine months before the Medway programme. So
24 we are going back to, what, around the spring of 2015?
25 It's about the time you're thinking of becoming a DCO?

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1 **A. Yes, sir.**
2 Q. Why didn't you cash in your chips then, as it were, and
3 just say, "This isn't for me"? Why did you apply to
4 become a DCO having seen what you'd witnessed?
5 **A. There were two reasons. The first was, I didn't know**
6 **what I had heard from Bass and seen in the solitary**
7 **confinement block that this was indicative of a culture**
8 **of abuse that existed in Brook House or indicative of,**
9 **you know, the systemic failings which led to and gave**
10 **rise to such abuse. The messaging on the training**
11 **course was that a detainee should be treated with**
12 **respect. We were told to use force only when necessary,**
13 **and so on.**
14 So whilst the conversations with Tom Bass and what
15 I had seen in the solitary confinement block
16 contradicted such messaging, I had no reason to believe
17 that it was emblematic or a much wider problem.
18 I had -- the DCOs I'd met on my training course, many of
19 them seemed like good people. The ACOs I'd worked with
20 didn't seem capable of such behaviour. I just did not
21 know enough about the centre to cash in my chips, as you
22 say. I felt confused and conflicted.
23 The second reason is that I didn't see any value in
24 quitting because, if members of staff quit upon
25 witnessing unacceptable behaviour, then the only members

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21 (Pages 81 to 84)

<p>1 of staff that would remain would be those that behaved</p> <p>2 unacceptably. So I didn't feel that me leaving would,</p> <p>3 you know, be of any benefit to anyone, and certainly not</p> <p>4 the detainees, because I considered myself</p> <p>5 a compassionate and empathetic member of staff that</p> <p>6 might be able to make a positive difference in the</p> <p>7 detention centre.</p> <p>8 Q. There was a third incident. So the third of the three</p> <p>9 that you talk about, which led to, really, where you are</p> <p>10 today. That begins at paragraph 63 of your statement.</p> <p>11 Tell us about that, please?</p> <p>12 A. This was around quarter to 9.00 pm. I had been working</p> <p>13 in the library as an activities DCO. So I was a DCO at</p> <p>14 this point. Probably three months into the job as</p> <p>15 a DCO, perhaps. I was sat outside the library. I had</p> <p>16 just locked up the library.</p> <p>17 Q. The library is where you conducted your -- or ran the</p> <p>18 activities department, was it?</p> <p>19 A. It's where I would be stationed for part of my shift as</p> <p>20 an activities officer. From the library, I would lend</p> <p>21 out books, hand out games like chess and hand out bail</p> <p>22 application forms.</p> <p>23 Q. Did it mean, as activities officer, you weren't obliged</p> <p>24 to do the other jobs that DCOs did, or was it just part</p> <p>25 of your shift that enabled you to do that?</p> <p style="text-align: center;">Page 85</p>	<p>1 you could be called upon to do any of the duties of</p> <p>2 a DCO in your role as an activities officer.</p> <p>3 Q. I see. So there you were. I think you said that you</p> <p>4 were on activities, or did I hear you say you were</p> <p>5 locking up the library?</p> <p>6 A. Yes, sir. I'd been working in the library for that</p> <p>7 evening. It was --</p> <p>8 Q. Time?</p> <p>9 A. -- time for the end of association.</p> <p>10 Q. What time would that be?</p> <p>11 A. 8.45 in the evening. I locked up the library and</p> <p>12 outside the library was an American detainee. He was</p> <p>13 stood on -- sat on some chairs which were fixated to the</p> <p>14 ground against the wall in the association corridor. He</p> <p>15 was refusing to go back to his room.</p> <p>16 Usually, detainees would just make their way back to</p> <p>17 their wings and back to their cells, so I didn't really</p> <p>18 make much of it initially. I went to check C and D wing</p> <p>19 courtyards to make sure no detainees were there and they</p> <p>20 were clear to be locked. And then I came back to the</p> <p>21 library, told the detainee he'd need to return to his</p> <p>22 cell. I think I then recall going to the activities</p> <p>23 office, which was slightly along the corridor from where</p> <p>24 the detainee was sitting. I entered the activities</p> <p>25 office. I came back out a few moments later and the</p> <p style="text-align: center;">Page 87</p>
<p>1 A. I'm not quite sure I understand your question, sir.</p> <p>2 Q. You were an activities officer. Did that mean that that</p> <p>3 was all you did or were you obliged also to do all the</p> <p>4 other things that other DCOs had to do?</p> <p>5 A. As an activities officer, we had three responsibilities.</p> <p>6 One was to be the library officer, in which you would</p> <p>7 sit in the library and do the things I've mentioned.</p> <p>8 The other would be to be the sports officer. It</p> <p>9 wouldn't involve much sport, but you would sort of --</p> <p>10 you'd have sort of free rein of the centre. You'd move</p> <p>11 between wings, you'd check equipment on the wings, you'd</p> <p>12 play pool with detainees, you'd hand out sporting</p> <p>13 equipment like footballs and cricket bats. The third</p> <p>14 role of an activities officer would be to work in the</p> <p>15 IT suite in which you would give detainees access to</p> <p>16 computers.</p> <p>17 So we didn't have to do the jobs of other DCOs that</p> <p>18 would work on the wings or the -- in detainee reception</p> <p>19 or visits hall. Basically, depending on what department</p> <p>20 you worked in, you had specific areas of responsibility.</p> <p>21 But your role was -- you had the same clearance and</p> <p>22 qualifications as a DCO. So you would -- you know,</p> <p>23 often, because Brook House was so short staffed, the</p> <p>24 role of the sports officer would be sacrificed and you</p> <p>25 would be put onto the wings to work, for example. So</p> <p style="text-align: center;">Page 86</p>	<p>1 detainee was sat in the same position.</p> <p>2 Q. Just pause there. Looking at these images, which part</p> <p>3 of the residential block is this all happening?</p> <p>4 A. So it's happening on the ground floor of the association</p> <p>5 corridors. So if you look at the bottom left of</p> <p>6 the picture on the left, you will see the orange -- the</p> <p>7 back of D wing, which is the orange bit. Then you will</p> <p>8 see, just to the right of that, you can just make out</p> <p>9 a courtyard.</p> <p>10 Q. With some awning?</p> <p>11 A. On which there is some tables and fake grass.</p> <p>12 Q. Yes.</p> <p>13 A. One of the windows sort of in the middle of that, which</p> <p>14 you can barely see, but you may just be able --</p> <p>15 Q. Is that where they put a canvas awning?</p> <p>16 A. Just underneath the canvas awning, yes, is the library.</p> <p>17 So we are on the ground floor of the library.</p> <p>18 Q. So it's in the cross-section?</p> <p>19 A. In the cross-section, yes. Then just outside the</p> <p>20 library, in the middle of that cross-section, is the</p> <p>21 association corridor in which the detainee is sitting.</p> <p>22 So by this point, I've left the activities office and</p> <p>23 I've gone back to the position and the detainee is still</p> <p>24 sat in the same position. There are two members of</p> <p>25 staff around the detainee and one manager.</p> <p style="text-align: center;">Page 88</p>

<p>1 Q. Who was the manager?</p> <p>2 A. Graham Panel. DCM Graham Panel.</p> <p>3 Q. Is that spelt P-A-N-E-L or E-L-L. How do you remember</p> <p>4 it?</p> <p>5 A. I think it's P-A-N-E-L, but I could be wrong.</p> <p>6 Q. Did he pronounce it "Pan-ell" rather than "Panel"?</p> <p>7 I know that can't be transcribed.</p> <p>8 A. Yes, it was pronounced "Pan-ell". Staff were talking to</p> <p>9 him for probably about five or six minutes, trying to</p> <p>10 encourage him to go back to his cell. As far as I was</p> <p>11 concerned, no real effort was made to understand why he</p> <p>12 was refusing to go back. He was just frustrated about</p> <p>13 the progress of his case and why he was in detention.</p> <p>14 He said he wouldn't be going back to be his cell.</p> <p>15 At the very most, 15 minutes was afforded to him.</p> <p>16 I think, in reality, it was probably more like seven or</p> <p>17 eight minutes before Graham Panel instructed the</p> <p>18 officers around him to restrain him and return him to</p> <p>19 his cell or to CSU. I didn't see where he was taken to.</p> <p>20 Q. In your judgment at that time -- and by now you were</p> <p>21 a DCO, you had your training -- did you think</p> <p>22 restraining him in that way, given he wasn't presenting</p> <p>23 any threat, he was just refusing to return to his room,</p> <p>24 was justified?</p> <p>25 A. It wasn't the way in which he was restrained which</p> <p style="text-align: center;">Page 89</p>	<p>1 Q. Do you think --</p> <p>2 A. And the only reason --</p> <p>3 Q. Carry on.</p> <p>4 A. The only conclusion that can be drawn is, because it was</p> <p>5 the end of our shift and we did not want -- Panel did</p> <p>6 not want the end of the shift to be delayed, he wanted</p> <p>7 to get home, staff wanted to get home, and so, to avoid</p> <p>8 personal inconveniences of having to go through the</p> <p>9 planning of a restraint, maybe taking it up the chain of</p> <p>10 command to a member of the senior management team or</p> <p>11 a more senior DCM, it was easier for DCM Panel to</p> <p>12 initiate a spontaneous use of force.</p> <p>13 Q. So the way you describe it, it was a personal</p> <p>14 convenience, or to avoid personal inconvenience to those</p> <p>15 who were off shift? By now, you say, if it lasted</p> <p>16 15 minutes, it was around 9 o'clock --</p> <p>17 A. Yes.</p> <p>18 Q. -- they should be going home?</p> <p>19 A. Yes, absolutely, sir, the shift finished at 9.15.</p> <p>20 Q. Did you raise any concern with anyone about that?</p> <p>21 A. No, sir.</p> <p>22 Q. Just tell us why?</p> <p>23 A. Again, it was a use of force initiated by detainee</p> <p>24 custody manager. Panel had described detainees in</p> <p>25 disparaging terms to me on numerous occasions. He often</p> <p style="text-align: center;">Page 91</p>
<p>1 concerned me --</p> <p>2 Q. How was he restrained?</p> <p>3 A. In that I think, technically, you know, the holds that</p> <p>4 were applied were done to the letter, were done as you</p> <p>5 were told in your course, but the fact that the</p> <p>6 restraint was instructed, initiated, was completely</p> <p>7 unnecessary. Here was a detainee who was not being</p> <p>8 violent or was self-harming, he was not being abusive to</p> <p>9 staff. Barely any time had been afforded to him to try</p> <p>10 and encourage him to go back to his cell before</p> <p>11 a spontaneous restraint was initiated, and there was</p> <p>12 absolutely no need or justification for a spontaneous</p> <p>13 restraint to be initiated because there was no risk to</p> <p>14 the detainee, in that he was not self-harming, and there</p> <p>15 was no risk to staff, in that he was not being violent</p> <p>16 or disruptive.</p> <p>17 So even if a use of force was justified, staff would</p> <p>18 have had to get into protective clothing for the safety</p> <p>19 of themselves and for the detainee to return the</p> <p>20 detainee either to his cell or to the solitary</p> <p>21 confinement block.</p> <p>22 The use of force was not planned. The staff were</p> <p>23 not instructed to get into protective equipment. They</p> <p>24 were told by DCM Panel to restrain the detainee, which</p> <p>25 was completely uncalled for.</p> <p style="text-align: center;">Page 90</p>	<p>1 referred to them as "cunts". I did not have any</p> <p>2 confidence that complaining about this use of force</p> <p>3 would need to anything other than marginalisation --</p> <p>4 Q. Of whom?</p> <p>5 A. Of me.</p> <p>6 Q. I will almost certainly be asking you something about</p> <p>7 that a little later, but without diverting to other</p> <p>8 examples, was marginalisation of officers who conducted</p> <p>9 themselves appropriately something you'd seen?</p> <p>10 A. Officers that were deemed too empathetic or</p> <p>11 compassionate towards detainees were mocked. I remember</p> <p>12 a female DCO who was particularly empathetic towards</p> <p>13 detainees. Rumours were spread about her having slept</p> <p>14 with detainees, comments were made behind her back.</p> <p>15 Rumours were spread about her. If you were seen to be</p> <p>16 too friendly, then you were seen as one of them.</p> <p>17 I mean, that's not the only example. I think you're</p> <p>18 going to ask me about a more specific example later.</p> <p>19 But I was aware of a -- I later became aware of a DCO</p> <p>20 who complained to staff -- DCMs and the senior</p> <p>21 management team -- about Panel. This was much later.</p> <p>22 But I'm just giving you an indication of how staff were</p> <p>23 treated when they raised concerns. She complained that</p> <p>24 Panel had stolen money, cash, from a detainee when it</p> <p>25 was sent in to him by his family or relative or friend.</p> <p style="text-align: center;">Page 92</p>

<p>1 She complained to senior management team about this and</p> <p>2 she was taken off duty as a DCO, placed on menial tasks.</p> <p>3 She was bullied.</p> <p>4 Q. Is this the same woman who --</p> <p>5 A. This is a different woman. She was bullied. Again,</p> <p>6 rumours were spread about her. She was seen as too</p> <p>7 soft.</p> <p>8 Q. Can I ask -- I'm not suggesting it was, but just so that</p> <p>9 we understand what the culture was, was this</p> <p>10 misogynistic, because they were women, in the instances</p> <p>11 of these two women, or was it because they were</p> <p>12 empathetic?</p> <p>13 A. Male officers who were deemed too empathetic were</p> <p>14 also -- the mick was taken out of them.</p> <p>15 Q. So they would be at the wrong end of that kind of</p> <p>16 treatment, whatever gender they were?</p> <p>17 A. Yes. And it was often, you know, if you were a woman</p> <p>18 and you were too empathetic towards a detainee, you were</p> <p>19 shagging them behind closed doors; if you were a male</p> <p>20 DCO and you were too empathetic towards a detainee, you</p> <p>21 were shagging them behind closed doors.</p> <p>22 Q. So there were no subtle distinctions made?</p> <p>23 A. No, no.</p> <p>24 Q. You say in your paragraph 68, coming back to the</p> <p>25 personal inconveniences that you were discussing with</p> <p style="text-align: center;">Page 93</p>	<p>1 how you think -- what you think it was, it was just</p> <p>2 banter, or was it part of a culture going beyond banter</p> <p>3 and perhaps bravado? What do you think?</p> <p>4 A. The word "banter" would be used by them to justify such</p> <p>5 language. I mean, I obviously felt it was much more</p> <p>6 damaging than banter. I mean, banter is -- I see it as</p> <p>7 kind of playful. It is something that's not sinister.</p> <p>8 But there was a language around detainees and the way in</p> <p>9 which they were restrained which was sinister. So it</p> <p>10 was more than banter.</p> <p>11 Q. From your perspective, do you think that this kind of --</p> <p>12 we will come to other examples later, but do you think</p> <p>13 this kind of -- these exchanges, did they, as it were,</p> <p>14 encourage this culture? In other words, did everybody</p> <p>15 join in or many of the people join in it becoming part</p> <p>16 of a developing culture, an evolving culture, among</p> <p>17 individual staff members, that if it was acceptable for</p> <p>18 a manager to describe a detained man as a "cunt" or</p> <p>19 refer to a use of force of "fucking someone up", did</p> <p>20 everybody seem to understand that that was all</p> <p>21 acceptable conduct?</p> <p>22 A. That culture existed when I arrived at Brook House so</p> <p>23 how it developed into that culture, I'm not sure. But</p> <p>24 it was obvious to me from the start that there was</p> <p>25 a toxic culture amongst staff with regard to use of</p> <p style="text-align: center;">Page 95</p>
<p>1 the incident of the American detained man, that you</p> <p>2 belief it was reflective of a broader culture among</p> <p>3 certain Brook House staff in which they showed apathy to</p> <p>4 vulnerable, disturbed or distressed detainees and acted</p> <p>5 not in the interests of the detainee's safety or welfare</p> <p>6 but with the sole intention of creating less work or</p> <p>7 inconvenience for themselves?</p> <p>8 A. Mmm-hmm.</p> <p>9 Q. So that was a culture around detained men --</p> <p>10 A. Mmm-hmm.</p> <p>11 Q. -- by certain of the staff in Brook House, and you've</p> <p>12 mentioned how verbal abuse was one manifestation of</p> <p>13 it --</p> <p>14 A. Mmm-hmm.</p> <p>15 Q. -- and a word in particular that Graham Panel used to</p> <p>16 describe detained men. Was he the only one?</p> <p>17 A. No, no, absolutely not.</p> <p>18 Q. You say, at your paragraph 70, this was reflected in how</p> <p>19 staff at the centre referred to incidents involving use</p> <p>20 of force. Staff would exchange anecdotes about force</p> <p>21 being used and would use words such as "battered" or</p> <p>22 "fucked up" to describe the impact on detained men,</p> <p>23 including where force had been used by managers?</p> <p>24 A. Yes, sir.</p> <p>25 Q. You describe that as "banter" that was used. Is that</p> <p style="text-align: center;">Page 94</p>	<p>1 force and their attitudes towards detainees.</p> <p>2 Q. You say at your paragraph 71 "there was an 'us and them'</p> <p>3 mentality among Brook House staff"?</p> <p>4 A. Yes, exactly.</p> <p>5 Q. What do you mean by "us and them"? What do you mean</p> <p>6 when you say "us and them"?</p> <p>7 A. Two teams. We are the staff. We look out for</p> <p>8 ourselves. We protect ourselves. And the other team</p> <p>9 are the detainees, who are to be looked upon</p> <p>10 suspiciously, should not be trusted, they're not one of</p> <p>11 us; otherisms, essentially, is what it was.</p> <p>12 Q. You told us a little earlier that part of your training</p> <p>13 involved familiarity with the Detention Centre Rules?</p> <p>14 A. Yes, sir.</p> <p>15 Q. I want to put up on screen part of the BBC protocol,</p> <p>16 which included your guiding principles and some</p> <p>17 hypothetical examples of the way that you should conduct</p> <p>18 yourself. But just for a particular reason, can we put</p> <p>19 up, please, <CPS000025>. Right at the bottom, if we can</p> <p>20 focus in on that, please, do you see "General duty of</p> <p>21 officers" under "Legal and employee guidelines"?</p> <p>22 A. Mmm-hmm.</p> <p>23 Q. This is rule 45 of the Detention Centre Rules:</p> <p>24 "(1) it shall be the duty of every officer to</p> <p>25 conform to these rules and the rules and regulations of</p> <p style="text-align: center;">Page 96</p>

<p>1 the detention centre, to assist and support the manager</p> <p>2 in their maintenance and to obey his lawful</p> <p>3 instructions.</p> <p>4 "(2) an officer shall inform the manager and the</p> <p>5 Secretary of State promptly of any abuse or impropriety</p> <p>6 which comes to his knowledge."</p> <p>7 Can we go to the next page, please. I'm going to</p> <p>8 skate over (3):</p> <p>9 "(4) detainee custody officers shall notify the</p> <p>10 healthcare team of any concern they have about the</p> <p>11 physical or mental health of a detainee.</p> <p>12 "(5) in managing detained persons, all officers</p> <p>13 shall seek by their own example and leadership to enlist</p> <p>14 their willing co-operation.</p> <p>15 "(6) at all times the treatment of detained persons</p> <p>16 shall be such as to encourage their self-respect,</p> <p>17 a sense of personal responsibility and tolerance towards</p> <p>18 others."</p> <p>19 Now, they seem to be pretty well-founded guiding</p> <p>20 principles. The Detention Centre Rules go back as far</p> <p>21 as 2001, so they certainly applied during your period at</p> <p>22 Brook House. Was rule 45 part of the Detention Centre</p> <p>23 Rules training that you had?</p> <p>24 A. Most likely.</p> <p>25 Q. You did tell us earlier that respect was one of</p> <p style="text-align: center;">Page 97</p>	<p>1 from activities and had to do the jobs that other DCOs</p> <p>2 did on the wing, were you ever aware by any means that</p> <p>3 a particular detained man had a particular mental health</p> <p>4 or perhaps a physical health vulnerability?</p> <p>5 A. I don't recall ever being told by sort of anyone with</p> <p>6 a medical background, like a nurse or a doctor. If you</p> <p>7 went onto the sort of G4S database and you searched</p> <p>8 a detainee's name, it's possible that you may have</p> <p>9 learnt that he -- in notes about him or observations</p> <p>10 that he was believed to maybe suffer with bipolar or</p> <p>11 schizophrenia or PTSD or whatever it might be. So it</p> <p>12 was possible to learn of detainees having mental health</p> <p>13 conditions or problems, but there wasn't kind of a rule</p> <p>14 by which you'd enter the wing and you'd be responsible</p> <p>15 for someone who had a mental health problem and you were</p> <p>16 sort of told about it and advised about it.</p> <p>17 I mean, if I was to go and work on E wing, for</p> <p>18 example, to cover short staffing, I might be told by the</p> <p>19 DCOs on the wing, the wing officers, that a detainee had</p> <p>20 mental health problems, but, again, not from, like,</p> <p>21 a nurse or a doctor or anyone qualified, really, to be</p> <p>22 making such an assessment.</p> <p>23 Q. A couple of things. First of all, you said "if you were</p> <p>24 to go onto the G4S database". Did you have general</p> <p>25 access to that?</p> <p style="text-align: center;">Page 99</p>
<p>1 the things that was emphasised?</p> <p>2 A. Yes.</p> <p>3 Q. Certainly that comes within those rules. What about the</p> <p>4 second paragraph:</p> <p>5 "An officer shall inform the manager and the</p> <p>6 Secretary of State promptly about any abuse or</p> <p>7 impropriety."</p> <p>8 Did you have that in mind yourself before going to</p> <p>9 the BBC? Forget G4S whistleblowing policies. Was that</p> <p>10 ever in your mind?</p> <p>11 A. I didn't know how to raise concerns, other than to go to</p> <p>12 my manager.</p> <p>13 Q. For which you say it was a waste of time?</p> <p>14 A. Of course. A waste of time because managers were</p> <p>15 complicit and involved in the abuse of detainees.</p> <p>16 I should be clear about that.</p> <p>17 Q. You have made that clear, more than once. Just thinking</p> <p>18 about, before we come on to something else that you've</p> <p>19 raised, which is the level of staffing, I'd like to ask</p> <p>20 you the following, and it is really about communication</p> <p>21 and information that you, as a DCO, had, going about</p> <p>22 your daily task. Were you ever informed by anyone</p> <p>23 whether any detained person had a particular mental</p> <p>24 illness or other vulnerability? In other words, as you</p> <p>25 were going around your duties, if you were pulled off</p> <p style="text-align: center;">Page 98</p>	<p>1 A. Yes.</p> <p>2 Q. So if you were interested or curious enough, you could</p> <p>3 look at the database all day long to find out about</p> <p>4 everybody who was on the wing?</p> <p>5 A. If you had time.</p> <p>6 Q. If you had time. Where would you find that --</p> <p>7 A. But there's no guarantee that sort of the medical</p> <p>8 records of the detainee would be held in the database.</p> <p>9 In fact, I'm not even sure that would have been allowed.</p> <p>10 But on the database, staff would make observations about</p> <p>11 detainees and sometimes information would be put on the</p> <p>12 database about a detainee's sort of previous behaviour</p> <p>13 in another detention centre or -- so you might get an</p> <p>14 indication through that as to what mental health</p> <p>15 problems the detainee had. There might be some</p> <p>16 information on there.</p> <p>17 Q. Where would you have access to it, through a computer?</p> <p>18 A. Yes, on any computer in the detention centre. You'd log</p> <p>19 into your account, onto your -- you'd put in your user</p> <p>20 name and password. You'd click on the G4S sort of --</p> <p>21 there was like -- I can't remember the name for it now,</p> <p>22 but if you click on the G4S kind of data logo and you</p> <p>23 could search the detainee's name, you could search his</p> <p>24 reference number and then some information about him</p> <p>25 would come up.</p> <p style="text-align: center;">Page 100</p>

25 (Pages 97 to 100)

1 For most detainees, there is very, very little
 2 information about them on there. For the most
 3 challenging detainees, because they required the most
 4 attention, there would be lots of observations written
 5 about these detainees.
 6 Q. But all of that depended on time, access to
 7 a computer --
 8 A. Yes.
 9 Q. -- and being interested and sufficiently curious?
 10 A. Yes. There was nothing -- I mean, so when we talk about
 11 when -- later in the week, I imagine we will talk about
 12 when a detainee is strangled and when another detainee
 13 is -- I'm observing another detainee who is on constant
 14 supervision but being held in solitary confinement and
 15 is being denied his medication. You know, those are
 16 just two examples when I was clearly looking after --
 17 you know, observing someone with mental health problems
 18 and I had no idea as to what those mental health
 19 problems were or how I might respond if --
 20 Q. That's what I'm really driving at. So either you do it
 21 yourself --
 22 A. Yes.
 23 Q. -- or you're on a wing and you find out by a fault of
 24 circumstance?
 25 A. Or guesswork.

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1 Q. Or rumour?
 2 A. Yes.
 3 Q. Or somebody happens to tell you or you happen to ask
 4 when you go on a wing to work there. What about formal
 5 handovers, for example, between shifts? Did the DCOs
 6 who came on in the morning or came on at night, did they
 7 get any formal handover, "X is in cell 7 of the CSU.
 8 Y is in cell or room 8 of the CSU, and they individually
 9 have those kind of problems you need to be aware of" or,
 10 "He's been doing that during the day. You need to be
 11 aware of it". Did any of that happen?
 12 A. There was an ACDT form, on which detainees were
 13 constantly observed, would have to be handed over. It
 14 was obvious, when you went into the wing office, which
 15 detainees were being held in which cells because there
 16 was a notice board in the wings and a whiteboard in the
 17 wings which said which detainees were being held in
 18 which cells, whether it was on the E wing or the
 19 solitary confinement block. There was no indication as
 20 to whether those detainees had any mental health
 21 problems or any issues. I mean, that could have been
 22 handed over, but there was no sort of protocol or there
 23 was nothing put in practice that -- through which you
 24 had to notify -- there was no kind of -- there was no
 25 handover to staff in which you'd kind of have to tick

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1 a box to say whether a detainee in one of the cells had
 2 a mental health problem, for example. It was just up to
 3 the wing officers to find out for themselves and pass
 4 the information on to their colleagues.
 5 Q. And a wing officer is, what?
 6 A. A DCO working on the wing.
 7 Q. What special job does the wing officer have that other
 8 officers working on the wing don't have? Is it
 9 a particular -- does he manage the wing when he's on?
 10 Is that what it means?
 11 A. The DCM would manage the wing -- a DCM would manage the
 12 wing. The DCM wouldn't always be present on the wing
 13 so, yes, it was the responsibility of the wing managers
 14 to manage the day-to-day running of the wing, so handing
 15 out soap and toiletries, settling disputes, responding
 16 to self-harm or fighting, unlocking cells, locking
 17 cells.
 18 Q. So forgive me, when you talk about wing officers, are
 19 you simply talking about officers who were working on
 20 the wing from time to time?
 21 A. Yes, sorry. So when I was working on a wing, I was
 22 a wing officer even though I was assigned to the
 23 activities department.
 24 Q. I see.
 25 A. So --

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1 Q. But there's a manager for each wing during each shift
 2 and on each day, is there?
 3 A. Yes, you'd have a C and D wing manager and then you'd
 4 have, I think, an A and B wing manager and then I think
 5 you'd have an E wing CSU manager, I think.
 6 Q. All right.
 7 A. I think.
 8 THE CHAIR: Mr Altman, sorry to interrupt, but may I ask
 9 a question at this point? It fits probably quite well
 10 here, Mr Tulley.
 11 In your training in that six-week initial training,
 12 do you recall having any training relating to common
 13 mental health diagnoses that you were likely to
 14 encounter as a DCO?
 15 A. No, chair, no.
 16 MR ALTMAN: So, looking at all of that, and perhaps there's
 17 more to ask you about it, but just -- let me just ask
 18 you this question, which perhaps many have in mind: how
 19 did non-medical staff, which is what you were -- you
 20 weren't healthcare, you certainly weren't a doctor --
 21 how did non-medical staff, like yourself and your
 22 colleagues, manage people whose particular conditions
 23 they knew little or nothing about other than received by
 24 rumour or happenstance?
 25 A. We managed them just as we did anybody else.

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26 (Pages 101 to 104)

1 Q. But, I mean, would you know if you were dealing with
2 somebody who might be dangerous or who might be
3 suicidal? You could be sitting there on a wing not
4 really knowing the kind of person that you were dealing
5 with and any particular issues you had to be alive to?
6 **A. Unless you had gone onto the database system and seen
7 something helpful, which wasn't necessarily guaranteed
8 to be there, or you had sort of -- you knew from
9 previous actions from the detainee that they might be
10 likely to self-harm or be unpredictable, then there was
11 nothing really to help you form that view.**
12 Q. So that we are clear, there was nothing, no vertical
13 line of information from the senior management team down
14 through the DCMs to the DCOs, the guys on the floor in
15 the wing managing these detained men?
16 **A. No.**
17 Q. Or via healthcare or among discipline staff in a sort of
18 horizontal sense, other than pure chance or finding out
19 because you had to find out?
20 **A. Yes, that's correct.**
21 Q. So no formality about information sharing?
22 **A. No formality.**
23 Q. Communication?
24 **A. Around mental health conditions, no formality
25 whatsoever.**

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1 Q. You mentioned a little earlier, of course, about the
2 kind of abuse that was common -- "cunts" and perhaps
3 other language, some such language. On the occasions
4 when the IMB visitors arrived, and I think you saw them
5 from time to time, and I will ask you a bit about that
6 later, was that language tailored? In other words, were
7 people far more polite and more careful around them, or
8 did they use that language in front of IMB visitors or
9 perhaps when the inspectorate turned up, or not? It may
10 be an obvious question with an obvious answer, but help
11 us.
12 **A. I was never aware of any abusive language or treatment
13 being demonstrated in front of the IMB.**
14 Q. Tell us about understaffing. You deal with that in your
15 paragraphs 71 and 72. It is something you have
16 mentioned and it is something we are going to hear from
17 other staff members in due course. Having dealt with
18 the "us and them" mentality, you say Brook House was
19 often severely understaffed?
20 **A. Yes.**
21 Q. Tell us about that. How many people would be working on
22 wings, what did it mean, what was the reality of life on
23 the ground, as it were, where there was understaffing?
24 **A. We were told in training that there should be three
25 members of staff on a wing. This was very rarely the**

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1 **case. There was often just two or one member of staff
2 working on a wing.**
3 Q. Forgive me, DCOs and --
4 **A. DCOs, sorry.**
5 Q. When you were told three --
6 **A. Three DCOs.**
7 Q. -- what did that mean? Three DCOs?
8 **A. Three DCOs. There are over 100 detainees on each wing,
9 roughly, so two members of staff, or one member of staff
10 is a completely inadequate number of staff members to
11 have on a wing and to see to the needs of the detainees
12 on that wing. Staff members would be responsible for
13 responding to instances of self-harm or drug misuse or
14 violence. They would be responsible for handing out
15 soap and other essentials like toilet roll. They would
16 be responsible for unlocking cells, admitting detainees
17 onto the wing, searching rooms, making property
18 appointments, handing out equipment like table tennis
19 bats.**
20 Q. What's a property appointment?
21 **A. Sometimes detainees would have things stored in detainee
22 reception, which they may want access to. So they could
23 make an appointment to -- with property to access
24 that -- access that property.**
25 Q. Yes.

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1 **A. There were a whole manner of responsibilities that
2 a wing officer had. They were under a lot of pressure.
3 Working on the wings was tough, probably the toughest
4 place to work in the detention centre, because you had
5 so many people to see to. It was intense work for
6 13 and a half hours a day for the wing officers that did
7 it every day.**
8 Q. That was the shift length, was it?
9 **A. Yes. For me, because I was an activities officer, my
10 lift was 8.15 in the morning to 9.15 at night. For the
11 wing officers, it was 7.45 in the morning to 9.15 at
12 night.**
13 Q. What about the night-time shift?
14 **A. 9.00 in the evening until 8.00 am in the morning.**
15 Q. While we are thinking about it, what about breaks?
16 Presumably, there were allowable breaks?
17 **A. Yes.**
18 Q. Tell us what they were, but the question is, were DCOs,
19 when wings were understaffed, able to take them?
20 **A. DCOs on the wings would often miss out on a break
21 because the centre was short staffed. They were
22 entitled to two 30-minute unpaid breaks a shift whilst
23 the detainees were locked in their cells, which would be
24 from around 12 o'clock to 12.30 in the afternoon and
25 5 o'clock to 5.30 in the afternoon/evening. As an**

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27 (Pages 105 to 108)

<p>1 activities officer, if I was not pulled away from the</p> <p>2 activities department to cover short staffing, I would</p> <p>3 cover breaks for colleagues, but I think, often, wing</p> <p>4 officers were -- the wings were so poorly staffed that</p> <p>5 wing officers could not get away to take a break.</p> <p>6 Q. You were there from 2015 through to the summer of 2017?</p> <p>7 A. Mmm-hmm.</p> <p>8 Q. Was there any particular period of time when staffing</p> <p>9 was particularly bad or was this a common occurrence all</p> <p>10 the way through?</p> <p>11 A. It was a common occurrence the whole way through. There</p> <p>12 was no time in particular that springs to mind. It was</p> <p>13 a poorly staffed detention centre.</p> <p>14 Q. You say:</p> <p>15 "The turnover of staff was high [I'm looking at your</p> <p>16 paragraph 71] and the workload placed upon wing officers</p> <p>17 and detainee reception officers was often unmanageable,</p> <p>18 by which I mean they could not manage the volume of jobs</p> <p>19 they had been tasked with and the time in which they had</p> <p>20 to complete them."</p> <p>21 A. Yes.</p> <p>22 Q. Detention or detainee reception officers, who are they?</p> <p>23 A. These were DCOs that worked in detainee reception, which</p> <p>24 is at the front of the main unit, the detainee unit.</p> <p>25 Q. Yes.</p> <p style="text-align: center;">Page 109</p>	<p>1 Q. More importantly, it meant that the detained men</p> <p>2 couldn't get the help and assistance that they were</p> <p>3 entitled to expect, presumably from officers like you</p> <p>4 who were working there?</p> <p>5 A. That's correct, and, as a consequence of that, they</p> <p>6 became more frustrated with the conditions in which they</p> <p>7 were kept, complained more, some might have been more</p> <p>8 abusive, more difficult to manage as a consequence of</p> <p>9 all of this, and then that in turn led staff to resent</p> <p>10 the detainees further for the additional work and stress</p> <p>11 this added to their lives, so it was a vicious cycle.</p> <p>12 Q. It just went around and around?</p> <p>13 A. It went round and round, staff blaming detainees,</p> <p>14 detainees blaming staff. I mean, if you set the abuse</p> <p>15 aside, this was an impossible place for detainees to</p> <p>16 live, in any case. The staffing was abysmal. There</p> <p>17 was -- it was so hard to see to the needs of</p> <p>18 the detainees in Brook House because there were so many</p> <p>19 more detainees to staff members. So, you know, even if</p> <p>20 you forget the abuse and the racism that I bore witness</p> <p>21 to, it was not a fit and proper place or a humane place</p> <p>22 in which to house detainees because their needs just</p> <p>23 could not be met. It's as simple as that. Poor</p> <p>24 staffing was a part of that, but obviously it's not the</p> <p>25 only reason.</p> <p style="text-align: center;">Page 111</p>
<p>1 A. Not accessible to detainees unless they are being</p> <p>2 discharged and admitted or they have a property</p> <p>3 appointment.</p> <p>4 You'd often have just two DCOs, maximum three,</p> <p>5 admitting detainees into the detention centre, but</p> <p>6 I think the -- I mean, I never worked in detainee</p> <p>7 reception myself, but the process of admitting detainees</p> <p>8 to the centre was quite a long one. And yet you'd</p> <p>9 sometimes have sort of five, six, seven detainees turn</p> <p>10 up in a Tascor van to be admitted. So it took a long</p> <p>11 time and a lot of work for staff to admit these</p> <p>12 detainees, and it was a workload which I know detainee</p> <p>13 reception staff struggled with at times, especially when</p> <p>14 staffing was short.</p> <p>15 Q. At the end of paragraph 71, you say:</p> <p>16 "Such an unmanageable workload for staff meant they</p> <p>17 were often irritable, stretched, overworked,</p> <p>18 unapproachable and tired."</p> <p>19 A. Yes, sir.</p> <p>20 Q. "This would often lead to staff taking their</p> <p>21 frustrations out on detainees."</p> <p>22 A. Yes, sir.</p> <p>23 Q. How would that manifest itself?</p> <p>24 A. It would manifest itself in the form of verbal abuse</p> <p>25 and, at times, physical abuse.</p> <p style="text-align: center;">Page 110</p>	<p>1 Q. Let me ask you this: doing the best you can, what</p> <p>2 proportion of officers behaved in the way that you have</p> <p>3 described, in general terms -- was it just a couple of</p> <p>4 bad apples or was it a significant majority or</p> <p>5 significant minority? How do you remember it?</p> <p>6 A. There was a significant minority of staff members who</p> <p>7 engaged in abuse in some form or another, and it was --</p> <p>8 you know, when I say "significant", I mean significant.</p> <p>9 It was a minority, but it was a significant minority.</p> <p>10 The majority of staff, apart from a couple of cases that</p> <p>11 I can remember, turned a blind eye to abuse, and there</p> <p>12 was a culture of silence, perhaps because of</p> <p>13 the hostility towards raising complaints and hostility</p> <p>14 towards treating detainees sort of kindly and with</p> <p>15 compassion, which was probably as a consequence of this</p> <p>16 behaviour, because staff who were otherwise well</p> <p>17 behaving members of staff were complicit in the abuse</p> <p>18 insofar as they did not complain about it.</p> <p>19 Q. And so we come back to the "Speak Out" posters, for</p> <p>20 example, which had scrawled across them "Snitches",</p> <p>21 "Don't be a rat", "Grasses" and marginalisation which</p> <p>22 you were talking about earlier?</p> <p>23 A. That certainly was a big element of it, but I think to</p> <p>24 be honest, more than anything, the fact that managers,</p> <p>25 the people above us as DCOs, were abusive towards</p> <p style="text-align: center;">Page 112</p>

1 detainees, I mean, besides when Yan Paschali throttled
 2 a detainee and threatened to put him to sleep --
 3 Q. We will come back to that.
 4 A. -- the most egregious act of cruelty and mistreatment of
 5 a detainee I can remember was performed by two DCMs. So
 6 I think, when you're a DCO, if the people above you are
 7 treating people so abhorrently, then you're not going to
 8 have any confidence in raising complaints. The SMT were
 9 barely visible. Members of the SMT, like
 10 Jules Williams, were close to abusive members of staff
 11 like Graham Panel. So people like myself had no
 12 confidence that going to the SMT would be anything other
 13 than fruitless and whose word was it going to be? The
 14 word of a DCO against the word of a DCM? Much of
 15 the abuse would happen inside cells in which there were
 16 no cameras. So how you would substantiate any of your
 17 complaints would be very difficult unless you had other
 18 officers who would co-operate with you. But my
 19 experience was most staff were too scared to raise
 20 concerns.
 21 MR ALTMAN: I see the time. For some of us, it's been
 22 a long day, Mr Tulley. So I will invite the chair to
 23 rise now and, perhaps, if that is all right for you and
 24 all right for you, chair, we will start again at
 25 10.00 am tomorrow.

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1 THE CHAIR: Thank you, and thank you for your flexibility.
 2 I know you came earlier, so much appreciated.
 3 A. No problem.
 4 THE CHAIR: Thank you. We will see you again tomorrow.
 5 A. Thank you, chair.
 6 (4.05 pm)
 7 (The hearing was adjourned to
 8 Tuesday, 30 November 2021 at 10.00 am)
 9
 10 I N D E X
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 12 MR CALLUM MICHAEL TULLEY (affirmed)2
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 14 Examination by MR ALTMAN2
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29 (Pages 113 to 114)

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