

<p>1 Friday, 10 December 2021</p> <p>2 (9.30 am)</p> <p>3 MR LIVINGSTON: Good morning, chair. We will now be hearing</p> <p>4 from James Wilson, if he can be sworn, please.</p> <p>5 MR JAMES WILSON (affirmed)</p> <p>6 Examination by MR LIVINGSTON</p> <p>7 MR LIVINGSTON: Mr Wilson, you gave a statement to the</p> <p>8 inquiry on 15 November 2021. Chair, that's at</p> <p>9 <DPG000003> and I ask for that to be adduced in full,</p> <p>10 please.</p> <p>11 Mr Wilson, that's the one at tab 1 of your bundle.</p> <p>12 Then, Mr Wilson, you also gave a statement in other</p> <p>13 proceedings as part of a judicial review claim</p> <p>14 in September 2018. That's at reference <GDW000001>.</p> <p>15 I ask for that to be adduced in full as well, please,</p> <p>16 chair. Mr Wilson, I will refer to this as your 2018</p> <p>17 statement. Hopefully it will be clear, as I'm asking</p> <p>18 questions, which statement I'm referring to, but if</p> <p>19 I have ever not made that clear, then just ask, please.</p> <p>20 A. Thank you.</p> <p>21 Q. Because those two statements are adduced into evidence,</p> <p>22 I won't be going through every paragraph in each of your</p> <p>23 statements in full, but I will just be asking you to</p> <p>24 focus on some issues.</p> <p>25 Is it correct, Mr Wilson, that your current role is</p> <p style="text-align: center;">Page 1</p>	<p>1 in your statement so that the transcriber can put them</p> <p>2 in, but in paragraph 25 [sic] of your 2018 statement,</p> <p>3 you say that, in July 2016, just after taking up your</p> <p>4 post, you met with Dan Haughton of G4S, Paul Gasson from</p> <p>5 the Home Office and Neil Davies, who I think was G4S</p> <p>6 head of visits at the time?</p> <p>7 A. Yes, that's correct.</p> <p>8 Q. You say that you were told at that point that G4S were</p> <p>9 keen that your work centred on social visits; is that</p> <p>10 right?</p> <p>11 A. Yes, that's correct.</p> <p>12 Q. Throughout your time as director of GDWG, was that</p> <p>13 a common theme?</p> <p>14 A. Very common theme, very much, yes.</p> <p>15 Q. Is it fair to say that there was some dispute between</p> <p>16 you and your organisation and G4S and the Home Office as</p> <p>17 to the limits of GDWG's role?</p> <p>18 A. Yes, very much so.</p> <p>19 Q. You say that you then met Ben Saunders, who was the</p> <p>20 director of Brook House -- of Gatwick IRCs, actually,</p> <p>21 in August 2016. You refer to this at paragraph 26 of</p> <p>22 your 2018 statement. Do you remember what was discussed</p> <p>23 then with Mr Saunders?</p> <p>24 A. Yes. I'm not certain on this point, but I think the</p> <p>25 previous meeting, that first meeting, I had with</p> <p style="text-align: center;">Page 3</p>
<p>1 as deputy director of Detention Action?</p> <p>2 A. Yes, that's correct.</p> <p>3 Q. But from June 2016 to December 2018, you were the</p> <p>4 director of Gatwick Detainees Welfare Group?</p> <p>5 A. Yes, that's right.</p> <p>6 Q. GDWG. In that role, in summary, you were responsible</p> <p>7 for the charity's day-to-day operations, strategic</p> <p>8 activities, line managing other staff members, working</p> <p>9 with volunteers and front-line work, including visits to</p> <p>10 detained people?</p> <p>11 A. Yes, that's correct.</p> <p>12 Q. We heard evidence from Ms Pincus yesterday -- she was</p> <p>13 the senior advocacy coordinator at the time. Were you</p> <p>14 her manager at the time?</p> <p>15 A. Yes, that's correct.</p> <p>16 Q. But did you also do the type of drop-in sessions that</p> <p>17 she talked about doing?</p> <p>18 A. Yes, I did.</p> <p>19 Q. Firstly, I want to ask you, for contextual purposes,</p> <p>20 about the relationship between your organisation and G4S</p> <p>21 and the Home Office prior to the relevant period. You</p> <p>22 will know that the relevant period is April 2017</p> <p>23 to August 2017.</p> <p>24 Looking, first, and you don't need to turn to it</p> <p>25 each time, but I'm just referring to paragraph numbers</p> <p style="text-align: center;">Page 2</p>	<p>1 Paul Gasson and Dan Haughton and Neil Davies was</p> <p>2 prompted by me. I had just come into post.</p> <p>3 I understood from my predecessor that the</p> <p>4 relationship -- that there could be work done on the</p> <p>5 relationship. I reached out to them for that meeting.</p> <p>6 I think Ben Saunders then subsequently contacted me</p> <p>7 directly and asked for a meeting, but I'm not certain on</p> <p>8 that point. I remember the meeting being fairly</p> <p>9 amenable, but he did very much emphasise that he saw our</p> <p>10 role as being there to do social visits, as they would</p> <p>11 repeatedly put that, only, and he would refer to -- this</p> <p>12 was also a common theme of meetings, three particular</p> <p>13 instances from the past where he felt we had stepped</p> <p>14 over certain lines.</p> <p>15 Q. When you had taken up your role in the summer of 2016,</p> <p>16 when you were given your handover -- I assume there was</p> <p>17 some sort of handover. How was the relationship with</p> <p>18 G4S and the Home Office described to you at that point?</p> <p>19 A. In my handover with my predecessor, I think his phrase</p> <p>20 was that we didn't really have a relationship with</p> <p>21 management. I subsequently learnt about the draft MoU</p> <p>22 that had happened in the previous month before</p> <p>23 I started, but my predecessor phrased it as there wasn't</p> <p>24 really a relationship and he said it would be very good</p> <p>25 if we could have a relationship with management.</p> <p style="text-align: center;">Page 4</p>

1 Q. So you saw, upon taking up the role, that there was an
2 importance of building up a relationship with both G4S
3 and the Home Office?
4 **A. Yeah. Just for sort of context, my previous role to**
5 **that had been as a service manager at the Red Cross**
6 **Family Tracing Service in London. We were going into**
7 **detention at the Heathrow centres and my team, that**
8 **team, had had some success in increasing access to the**
9 **centre there for family tracing purposes. So I guess**
10 **I had some, perhaps naive, perhaps slightly arrogant,**
11 **optimism, but I thought that I could help us build**
12 **a more cordial relationship.**
13 Q. Thanks, Mr Wilson. Just one thing. You will know that
14 the transcribers are taking a note of everything you
15 say. If you try and slow down just a little bit.
16 **A. Oh, of course.**
17 Q. It is obviously very normal, and I would do the same,
18 but if you can try to do that, I think that would be
19 appreciated.
20 In your 2018 statement, you say that, after that
21 meeting with Ben Saunders -- so that was summer 2016.
22 Then coming on to 2017, in February 2017, you tried to
23 secure the use of a desk in Brook House alongside
24 welfare officers. Was that in the welfare office?
25 **A. Yes.**

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1 Q. What was the reception to that proposal at that time; do
2 you remember?
3 **A. So this -- it was not -- there was precedent for that**
4 **happening, we knew, from other organisations. Actually,**
5 **again, in my Red Cross role, we'd managed to do that, to**
6 **start having some access in the welfare area at**
7 **Heathrow, and I know there were other charities,**
8 **including my current employers, Detention Action, at**
9 **Heathrow, who have a similar arrangement where they have**
10 **times to go into the welfare space.**
11 Q. Just to clarify, you were aware that other NGOs --
12 **A. In other centres.**
13 Q. -- in other centres had a desk or some sort of presence
14 in the welfare office, which means inside the actual
15 centre; yes?
16 **A. Yes, which has numerous advantages, not least -- you**
17 **know, we always referred to -- I'm sure we will talk**
18 **about our drop-in surgery arrangements. They were**
19 **never, in my time, truly drop-in because people had to**
20 **prebook appointments. A desk in the welfare area**
21 **further into the centre could be a genuine drop-in where**
22 **people could come, so much more accessible, particularly**
23 **to vulnerable clients.**
24 **But, sorry, to answer your question, the response**
25 **from -- we initially spoke to the welfare officers that**

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1 **we were in frequent contact with. We usually had a very**
2 **good relationship with the welfare -- individual welfare**
3 **officers and had very positive impressions of them, and**
4 **our impressions of them were always that they --**
5 **invariably, I think, that they were doing a very good**
6 **job but were very stretched, very short staffed. They**
7 **were very positive about this idea. But the proposal**
8 **was then escalated and it was then declined by**
9 **management.**
10 Q. Did they ever give you a reason for why it was declined?
11 **A. No. I think I said in the statement I checked back and**
12 **I couldn't find -- wasn't able to find, even while at**
13 **GDWG, a sort of written list of reasons, but it was**
14 **Dan Haughton and Michelle Brown, I understand, that**
15 **turned that down. I think the only reasons we were**
16 **given was that there was no need, and that the welfare**
17 **officers wouldn't have capacity to support us then**
18 **coming in and doing that role.**
19 Q. So they were suggesting that you being there alongside
20 the welfare office might increase the amount of work
21 that the welfare office had to do, whereas your point,
22 presumably, was that it might actually decrease the
23 amount of work that the welfare office had to do?
24 **A. We felt confident it would decrease that work and,**
25 **indeed, that was the impression we were getting from the**

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1 **welfare officers themselves.**
2 Q. Did you consider that that response from G4S was
3 a genuine one? Do you think that they genuinely thought
4 that it would increase the work and thought that there
5 was no need, or did you see that as an excuse or a fig
6 leaf?
7 **A. It's hard to speculate.**
8 Q. Sorry, Mr Wilson, I don't really want you to speculate
9 now. It's more, you know, at the time, that was the
10 response. What was your thinking when you got that
11 response?
12 **A. I didn't think -- I didn't know exactly what was behind**
13 **it. I don't think it surprised us in the context of**
14 **other messages we had around sort of suspicions or lack**
15 **of clarity around our work.**
16 **I didn't -- the reasons didn't make sense because**
17 **our impressions were the welfare area was very busy,**
18 **there were large numbers of vulnerable people, we were**
19 **seeing lots of clients, so there was a need, and, again,**
20 **it wasn't -- again, if they'd spoken to the welfare**
21 **officers, I don't think they would have said, "We don't**
22 **have capacity to support this charity being there". So**
23 **those didn't make sense, those reasons.**
24 Q. Coming on to a meeting that you had in March 2017, so
25 this is just a month before the relevant period, you

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2 (Pages 5 to 8)

<p>1 were invited to this meeting by Mr Gasson of</p> <p>2 the Home Office, I think, and he said that he had some</p> <p>3 concerns about some staff and volunteers within GDWG and</p> <p>4 he wanted to meet to clarify the role that GDWG carry</p> <p>5 out in the centre and if that needed to be revisited.</p> <p>6 You address this a little in your statement at</p> <p>7 paragraph 29, but, in summary, is it right that</p> <p>8 Mr Gasson, Mr Haughton and Mr Skitt were all there?</p> <p>9 Mr Gasson of the Home Office and Mr Haughton and</p> <p>10 Mr Skitt of G4S?</p> <p>11 A. Yes, that's correct.</p> <p>12 Q. They referred, as you said in your statement, to some of</p> <p>13 the historical complaints that were raised about GDWG,</p> <p>14 so about someone giving a witness statement in support,</p> <p>15 someone standing surety for a detainee and that you were</p> <p>16 sometimes not obtaining consent about repeat drop-ins,</p> <p>17 and an accusation that your organisation had been giving</p> <p>18 legal advice. Is that right?</p> <p>19 A. Yes, that's correct.</p> <p>20 Q. How did you feel about that meeting at the time; do you</p> <p>21 recall?</p> <p>22 A. I remember -- I mean, I note from the emails -- and this</p> <p>23 was a trend that happened at later meetings -- that</p> <p>24 I was trying to ask when these requests came from the</p> <p>25 IRC management for these meetings, I would try to ask</p> <p style="text-align: center;">Page 9</p>	<p>1 A. It felt very joint. It didn't, in terms of -- it felt</p> <p>2 like, in this case, three people from the same</p> <p>3 organisation very much on the same page.</p> <p>4 Q. Building on that, what was your impression at this</p> <p>5 stage -- so we are talking just before the relevant</p> <p>6 period -- about the relationship between, if not G4S and</p> <p>7 the Home Office as a whole, at least between these</p> <p>8 people who were employees of G4S and the Home Office?</p> <p>9 A. I don't think I had a sense, at that sort of management</p> <p>10 level, of there being -- as I say, there was very much</p> <p>11 a sense certainly we got at these meetings, which was my</p> <p>12 main contact with management, they were very much, yeah,</p> <p>13 on the same page. So there wasn't a sense of -- I mean,</p> <p>14 for example, one could be in that situation and get the</p> <p>15 sense of G4S that there being a tension between the</p> <p>16 parties or all coming from slightly different angles.</p> <p>17 I didn't get that sense.</p> <p>18 Q. In your experience prior to taking up this role and sort</p> <p>19 of up until this point, what would you have expected --</p> <p>20 so we know that Brook House was run by G4S, but the</p> <p>21 Home Office have overall responsibility for it. Did you</p> <p>22 have any expectation about how you would encounter those</p> <p>23 two organisations?</p> <p>24 A. No. Possibly -- I think I was a little surprised from</p> <p>25 the first meeting. I mean, Paul Gasson was a very --</p> <p style="text-align: center;">Page 11</p>
<p>1 for more information about what had prompted it and they</p> <p>2 were reluctant to share things ahead of the meeting,</p> <p>3 which made it difficult, because I couldn't -- you know,</p> <p>4 I couldn't look into any concerns they might have had.</p> <p>5 I felt concerned about that meeting. It was quite</p> <p>6 a negative meeting. I was -- I think I was surprised</p> <p>7 already by that point they were still referring back to</p> <p>8 increasingly historical things where, you know, from our</p> <p>9 point of view, we hadn't stepped over any line -- any</p> <p>10 inappropriate line anyway, but they were increasingly in</p> <p>11 the past.</p> <p>12 Q. Just to anchor these in dates, I think I'm right in</p> <p>13 thinking that the issue about the Twitter post was in</p> <p>14 2013. The issue about the witness statement in support</p> <p>15 of a claim was in 2015. And then the standing surety</p> <p>16 was around then as well; is that right?</p> <p>17 A. That's correct, absolutely.</p> <p>18 Q. So this was all at least a year, and sometimes a few</p> <p>19 years, before you even came into post?</p> <p>20 A. That's correct, yes.</p> <p>21 Q. You have already explained that, at this meeting, you</p> <p>22 had two people from the G4S and somebody from the</p> <p>23 Home Office. Did you feel like these were concerns</p> <p>24 being raised by G4S, by the Home Office or jointly by</p> <p>25 the two of them?</p> <p style="text-align: center;">Page 10</p>	<p>1 I think more or less constant figure at the meetings</p> <p>2 that I had during my time at GDWG. I think I was</p> <p>3 initially surprised that there was necessarily</p> <p>4 a Home Office manager there because G4S had the contract</p> <p>5 to run the centre. That was the operational</p> <p>6 responsibility. That's who I imagined, coming into</p> <p>7 post, our main relationship point would be.</p> <p>8 Q. Was it ever explained to you why the Home Office had</p> <p>9 a presence there?</p> <p>10 A. No, I don't believe it was, no.</p> <p>11 Q. If we could bring up on screen, please, <GDW000003> at</p> <p>12 page 11. Chair, that's tab 4 of your bundle.</p> <p>13 If we could zoom in on the bottom half of that page,</p> <p>14 please. Mr Wilson, this is an email you sent four days</p> <p>15 after that meeting, on 13 March 2017. It says:</p> <p>16 "Dear Paul, I hope you had a good weekend.</p> <p>17 "Thank you very much for the meeting last week.</p> <p>18 I really appreciated your, Dan and Steve's time, the</p> <p>19 chance to catch up and the opportunity to address some</p> <p>20 current concerns. I particularly appreciated the honest</p> <p>21 and positive conversation we were able to have; we</p> <p>22 continue to value highly our good working relationship</p> <p>23 with the Home Office and with G4S."</p> <p>24 Did you consider yourself to have a good working</p> <p>25 relationship with the Home Office and G4S at this time?</p> <p style="text-align: center;">Page 12</p>

<p>1 A. I certainly wouldn't have been able to honestly say that</p> <p>2 a few months down the line, after subsequent meetings.</p> <p>3 I think possibly, at this point, I was still hopeful of</p> <p>4 having that, but I think, to be candid, I was being --</p> <p>5 this was putting a very positive and diplomatic take on</p> <p>6 it because I wanted to build that, I wanted to be as</p> <p>7 responsive as I possibly could to the concerns.</p> <p>8 Q. Because, obviously, this -- that paragraph I just read</p> <p>9 out reads quite positively, other than the thing I said,</p> <p>10 you know, "Thank you very much ... really appreciated</p> <p>11 [the opportunity] ... honest and positive conversation".</p> <p>12 You have said that you were trying to put a sort of</p> <p>13 positive spin on things. Is that what we can take from</p> <p>14 this paragraph?</p> <p>15 A. I think that would be -- that's what I would suggest</p> <p>16 would be the main --</p> <p>17 Q. Okay.</p> <p>18 A. I mean, I would say that -- you may come on to this --</p> <p>19 in terms of the specific concerns of that meeting, I did</p> <p>20 then go on to respond in writing. I did -- of course</p> <p>21 I would rather they raised things to me rather than not,</p> <p>22 as long as they were then open to discussion about them.</p> <p>23 Q. One thing I wanted to check while we are on this is, the</p> <p>24 people that you met with on a fairly regular basis who</p> <p>25 come up, and we will come to them, which is Paul Gasson</p> <p style="text-align: center;">Page 13</p>	<p>1 a document that we ever signed, but it was something</p> <p>2 that increasingly came up as a request in meetings and</p> <p>3 in correspondence, and it's something that, in practice,</p> <p>4 I had more or less agreed to follow.</p> <p>5 Q. If we can go to that draft MoU, that's at <GDW000003> at</p> <p>6 page 1. If it helps for the evidence handler, I'm going</p> <p>7 to be going to this document and pages from it a fair</p> <p>8 amount.</p> <p>9 If we can zoom in on the bullet points, the first</p> <p>10 few bullet points. I already asked Anna Pincus about</p> <p>11 this yesterday, but as you were the director during the</p> <p>12 relevant period, I need to ask you as well. So, as you</p> <p>13 have alluded to, this was a draft memorandum of</p> <p>14 understanding. When you came into your post, were you</p> <p>15 told there was a draft MoU that had never been agreed?</p> <p>16 A. I don't remember being told that immediately. I may be</p> <p>17 misremembering. I don't think my predecessor</p> <p>18 highlighted that to me. So that's something that</p> <p>19 emerged in the course of meetings with Brook House</p> <p>20 management.</p> <p>21 Q. You will see here, obviously, it says at the second</p> <p>22 bullet point what the purpose of meetings was, and it</p> <p>23 says:</p> <p>24 "On occasion it may be in the interest of a detainee</p> <p>25 to have a further follow-up meeting in private with GDWG</p> <p style="text-align: center;">Page 15</p>
<p>1 from the Home Office, Dan Haughton and Steve Skitt, and</p> <p>2 there are other people as well. Were you ever told that</p> <p>3 you had a specific liaison at G4S? Was there anyone who</p> <p>4 was your sort of go-to person?</p> <p>5 A. I don't think I was, no. I think increasingly I, in the</p> <p>6 first instance, would probably have gone to Steve Skitt.</p> <p>7 He became our de facto -- my de facto first point of</p> <p>8 contact. But I don't think that was ever formalised.</p> <p>9 Q. He was the deputy director of Brook House at the</p> <p>10 relevant time; is that right? To your understanding?</p> <p>11 A. I think that's correct, yes.</p> <p>12 Q. I want to come on now to the issue of restrictions on</p> <p>13 visits and your work done with or for detained people.</p> <p>14 We have already heard evidence yesterday from</p> <p>15 Ms Pincus about the position regarding drop-ins, as they</p> <p>16 are called, although, as you say, I think they weren't</p> <p>17 actually drop-ins. In summary, am I right in saying</p> <p>18 that the position as at this point, the beginning of</p> <p>19 the relevant period, was agreed that you would make</p> <p>20 a request on each occasion that you wanted to have</p> <p>21 a repeat drop-in, so a second drop-in visit with</p> <p>22 a detained person; is that right?</p> <p>23 A. In practice, more or less. I mean, I think that that</p> <p>24 request for -- you know, for us to seek explicit</p> <p>25 permission was in the draft MoU, although that wasn't</p> <p style="text-align: center;">Page 14</p>	<p>1 staff. These will be exceptional circumstances</p> <p>2 requiring prior agreement ..."</p> <p>3 Whether or not the memorandum of understanding was</p> <p>4 ever agreed, was it your position that that bullet point</p> <p>5 setting out that there would need to be exceptional</p> <p>6 circumstances requiring prior agreement, did that govern</p> <p>7 your relationship?</p> <p>8 A. It was made increasingly clear to me by management that</p> <p>9 they expected that to be happening and, therefore,</p> <p>10 that's what we tried to follow.</p> <p>11 Q. If we can go down to the penultimate paragraph of this</p> <p>12 page, I'm going to, again, come on to the issue of</p> <p>13 reporting safeguarding in due course, but you will see</p> <p>14 the top paragraph there sets out that:</p> <p>15 "As part of the GDWG surgery meetings with</p> <p>16 detainees, it is critical that where any ... staff</p> <p>17 member has reasonable cause to believe that a detainee</p> <p>18 may be suffering or may be at risk of suffering</p> <p>19 significant harm, a member of Brook House IRC staff is</p> <p>20 notified immediately."</p> <p>21 Would you say that that, even if the document wasn't</p> <p>22 agreed, set out your understanding of what the agreement</p> <p>23 was as to what you would do?</p> <p>24 A. Yes, essentially. We had a number of concerns about the</p> <p>25 draft MoU as it stood and the reasons why we would -- if</p> <p style="text-align: center;">Page 16</p>

<p>1 we were going to sign it, we would have wanted to amend</p> <p>2 it substantially. We were concerned about -- I was</p> <p>3 concerned about this paragraph potentially tying us to</p> <p>4 a particular standard in terms of when we would report</p> <p>5 to management that may not have aligned with our</p> <p>6 safeguarding policy. But, essentially, this is -- this</p> <p>7 is correct.</p> <p>8 Q. Were you concerned that the standard here was too low,</p> <p>9 too high?</p> <p>10 A. Potentially. Potentially too high.</p> <p>11 Q. You thought that, in fact, you might want to notify</p> <p>12 Brook House staff even where they weren't suffering, or</p> <p>13 at risk of suffering, significant harm but there might</p> <p>14 be lower-level things?</p> <p>15 A. Oh, sorry, no, I think what I mean is, this may have</p> <p>16 put -- set an imposition on us to report in cases where</p> <p>17 we wouldn't have felt that threshold or the need, or the</p> <p>18 appropriateness was there.</p> <p>19 Q. So is it fair to say, and we can come on to some</p> <p>20 specific examples in due course, that there may have</p> <p>21 been situations during the relevant period where you or</p> <p>22 your staff members thought that a detainee was</p> <p>23 suffering, or was at risk of suffering, significant harm</p> <p>24 but, for other reasons, you would have decided not to</p> <p>25 report that?</p> <p style="text-align: center;">Page 17</p>	<p>1 I recall the standard was along the lines that I am</p> <p>2 describing. So it was around immediate harm, active</p> <p>3 suicidal thoughts, feelings, plans, imminent risk of</p> <p>4 self-harm where that wasn't known to the centre. We may</p> <p>5 go on to talk about this. I feel clear that that was --</p> <p>6 that was clear to staff and volunteers across the</p> <p>7 organisation.</p> <p>8 Q. We will come back to the safeguarding issue in due</p> <p>9 course. Sticking to visits, if we can turn to page 14</p> <p>10 of this document, please, this is an email which can be</p> <p>11 seen from the previous page is dated 22 March, and it is</p> <p>12 sent to Dan Haughton from Naomi Blackwell, who was one</p> <p>13 of your team. Yes?</p> <p>14 A. Yes.</p> <p>15 Q. It says, as you can see:</p> <p>16 "Apologies for eating into your time, but I just</p> <p>17 wanted to clarify this so we are all clear. Are you</p> <p>18 happy for us to request repeat (drop-in) visits and</p> <p>19 attend, provided we have informed you prior to the</p> <p>20 visit, ie, we don't need to wait for your permission?"</p> <p>21 If we can go to the previous page, please, page 13,</p> <p>22 if we can expand the text a little bit, this is</p> <p>23 Dan Haughton's email in reply, copying in you, and it</p> <p>24 says:</p> <p>25 "Hi Naomi, it's not a problem.</p> <p style="text-align: center;">Page 19</p>
<p>1 A. I mean, I'm happy to, you know, talk around -- maybe we</p> <p>2 will come to this in terms of the context and the type</p> <p>3 of situations where we might have raised something</p> <p>4 immediately or not. But I guess there are certainly</p> <p>5 situations where -- I think, for us, the test would be</p> <p>6 around immediate -- the key thing would be around</p> <p>7 immediate harm, particularly around active suicidal</p> <p>8 thoughts and feelings and plans, and active risk of</p> <p>9 self-harm where we were clear, or where there was</p> <p>10 a doubt, that the centre already knew, which in many</p> <p>11 cases they would. Unfortunately, people in detention</p> <p>12 are often in very desperate situations, there are lots</p> <p>13 of things that come up, there are lots of things where,</p> <p>14 for a variety of reasons, it wouldn't be appropriate or</p> <p>15 wouldn't feel necessary to flag that immediately up with</p> <p>16 the management -- or may not be appropriate.</p> <p>17 Q. Do you remember Ms Pincus said that she thought there</p> <p>18 was a safeguarding policy in place at GDWG at the time?</p> <p>19 Is that your recollection as well?</p> <p>20 A. Yes, yes.</p> <p>21 Q. Obviously, it is possible that -- you may be able to</p> <p>22 disclose this in due course, if it hasn't been disclosed</p> <p>23 already, but do you remember whether that set a standard</p> <p>24 as to when you had to notify G4S staff?</p> <p>25 A. Yes. I don't recall the exact wording, but I think --</p> <p style="text-align: center;">Page 18</p>	<p>1 "We should keep to the current memorandum of</p> <p>2 understanding which states ..."</p> <p>3 And there's two bullet points there:</p> <p>4 "During our recent meeting with James, it was agreed</p> <p>5 that should a follow-up surgery appointment be required</p> <p>6 the purpose of this would be to identify another GDWG</p> <p>7 visitor should the original matching not be appropriate.</p> <p>8 "So moving forward any requests should be given</p> <p>9 prior permission before progressing."</p> <p>10 First of all, you will see there it says "we should</p> <p>11 keep to the current memorandum of understanding". Did</p> <p>12 you think that there was a current memorandum of</p> <p>13 understanding agreed?</p> <p>14 A. No. It had never been finalised or signed.</p> <p>15 Q. Where it says "during our recent meeting with James" and</p> <p>16 it says what you'd agreed, ie, that the purpose of any</p> <p>17 repeat drop-in would be to identify another visitor for</p> <p>18 an inappropriate matching, was that agreed?</p> <p>19 A. No. That was very much what they wanted -- from the</p> <p>20 point of view of IRC management.</p> <p>21 (Fire alarm test)</p> <p>22 MR LIVINGSTON: Sorry, I should have highlighted that at the</p> <p>23 beginning. I forgot.</p> <p>24 Just to get my place with what you just said, you</p> <p>25 have said that, in terms of them saying here that this</p> <p style="text-align: center;">Page 20</p>

<p>1 was agreed with you, that was what they wanted the</p> <p>2 position to be, but it's already -- your position was</p> <p>3 that wasn't the agreed position?</p> <p>4 A. If I can elaborate slightly, their repeat message on</p> <p>5 this was, what they wanted to be the case was that the</p> <p>6 purpose of our -- we are calling it a drop-in -- the</p> <p>7 drop-in appointment in the legal visit room was for us</p> <p>8 to speak to a detainee and assign a social visitor and</p> <p>9 from their point of view, therefore, the only reason you</p> <p>10 need to see the same client again was if, for example,</p> <p>11 the first social visitor had had to -- was away and you</p> <p>12 needed to assign somebody else to step in for them. I'm</p> <p>13 confident I was always diplomatic in how I responded to</p> <p>14 that but, from our point of view, that wasn't the only</p> <p>15 purpose of the surgery because we were also working with</p> <p>16 clients on a range of other needs and, therefore, that</p> <p>17 would be a possible reason, reassigning a different</p> <p>18 visitor for a second visit, but by no means the only one</p> <p>19 and I think I was always clear on that.</p> <p>20 Q. Do you think that this was a misunderstanding of what</p> <p>21 had been agreed or do you think that this was trying to</p> <p>22 suggest something had been agreed that hadn't been?</p> <p>23 A. I think it's the latter. I think it's trying to insist</p> <p>24 on something that had been, when what had happened at</p> <p>25 those meetings is I had been told that this should be</p> <p style="text-align: center;">Page 21</p>	<p>1 As you note in your statement, you note that the</p> <p>2 reason -- it is actually at the bottom of this page --</p> <p>3 why Ms Blackwell was requesting a repeat drop-in was</p> <p>4 that this detained person was unable to correspond</p> <p>5 meaningfully via telephone or fax. GDWG had concerns</p> <p>6 about his mental health and wanted to be able to</p> <p>7 maintain regular contact with him to support him.</p> <p>8 Then, if we go up to the top half of the page,</p> <p>9 please, as we can see, 6 April, from Dan Haughton,</p> <p>10 copying in you, Steve Skitt and Paul Gasson. This says,</p> <p>11 in the third paragraph:</p> <p>12 "From the shared understanding we have with James,</p> <p>13 drop-in clinics are not the place to maintain regular</p> <p>14 contacts with detainees. This should be taking place in</p> <p>15 the context of social visits."</p> <p>16 Do you think that was a shared understanding with</p> <p>17 you?</p> <p>18 A. No. No, in short.</p> <p>19 Q. If we actually see the top bit of that, it says:</p> <p>20 "Thank you for raising concerns about [this person]</p> <p>21 have you raised these concerns with the officers at</p> <p>22 Brook House before?"</p> <p>23 Do you know if those concerns had been raised</p> <p>24 before?</p> <p>25 A. I'm sorry, I don't recall that.</p> <p style="text-align: center;">Page 23</p>
<p>1 the case rather than us mutually agreeing.</p> <p>2 Q. If we can turn to page 10 of this document, please, and</p> <p>3 if we can go to the first paragraph that has the bold in</p> <p>4 it, and starts with "Firstly". This is your email in</p> <p>5 response, on 29 March, and you respond to various</p> <p>6 points, but on the issue we have just been talking about</p> <p>7 here, you say, in summary, that you are happy to ask for</p> <p>8 approval for second drop-in visits, but you say "there</p> <p>9 are a number of reasons why we may wish to see</p> <p>10 a detainee for a second time, and I am happy to</p> <p>11 elaborate if ever needed"?</p> <p>12 A. (Witness nods).</p> <p>13 Q. Am I right in thinking that you were content to agree to</p> <p>14 the limit that you had to ask for approval for a repeat</p> <p>15 drop-in, but you weren't content to agree that there was</p> <p>16 only one purpose of a repeat drop-in?</p> <p>17 A. Yes, absolutely.</p> <p>18 Q. Coming on to sort of chronologically, so this is the end</p> <p>19 of March, so a couple of days before the relevant</p> <p>20 period. At paragraph 30 of your 2018 statement --</p> <p>21 that's page 10, for the transcribers, of <GDW000001>,</p> <p>22 you discuss an incident in April 2017 where Dan Haughton</p> <p>23 refused a request by your colleague Ms Blackwell to see</p> <p>24 a detainee for a repeat drop-in session. If we can go</p> <p>25 to page 15 of this document, please.</p> <p style="text-align: center;">Page 22</p>	<p>1 Q. It says in the second paragraph:</p> <p>2 "I have passed your concerns about [this person's]</p> <p>3 mental health to our healthcare team who will refer him</p> <p>4 to see our onsite registered mental health nurse if this</p> <p>5 is not already in place."</p> <p>6 What would you say about this reaction to it? So</p> <p>7 saying no to the second drop-in, but it is taking action</p> <p>8 in relation to concerns about mental health raised?</p> <p>9 A. I mean, it's welcome, if there's an indication of steps</p> <p>10 being taken to give -- you know, somebody who needs</p> <p>11 extra support with their mental health. You know, we</p> <p>12 saw very frequently in our work clients whose mental</p> <p>13 health needs didn't seem to be being appropriately met.</p> <p>14 We had generally, as I've mentioned, a very positive</p> <p>15 relationship with the welfare team, a more difficult</p> <p>16 relationship with healthcare, and therefore we'd often</p> <p>17 be making enquiries ourselves and were often</p> <p>18 unsatisfied -- you know, it seemed to us the correct</p> <p>19 support wasn't in place. So it is a welcome, you know,</p> <p>20 action and update, but it would be unlikely, because of</p> <p>21 our experience elsewhere, to have satisfied us. We</p> <p>22 would have wanted at least to speak to the client more</p> <p>23 to see what had happened and what had changed.</p> <p>24 Q. We see here, and we will see throughout, and we have</p> <p>25 already discussed, this distinction being made, quite</p> <p style="text-align: center;">Page 24</p>

<p>1 a sort of stark distinction between drop-in clinics</p> <p>2 where staff can go and see someone in the legal visits</p> <p>3 room, and social visits, which are a visitor,</p> <p>4 a volunteer visitor, seeing someone. Here we have</p> <p>5 Dan Haughton saying, "You can't maintain regular</p> <p>6 contacts in the drop-ins, but that can happen in the</p> <p>7 context of social visits". Did you have any</p> <p>8 understanding as to why there was seen to be this stark</p> <p>9 difference between the two types of contact?</p> <p>10 A. I'm sorry, I'm not clear, in terms of -- from</p> <p>11 management's point of view?</p> <p>12 Q. Yes. Firstly, did you understand why they saw it as</p> <p>13 essentially fine to keep contact with visitors but not</p> <p>14 fine to keep contact with -- by GDWG staff?</p> <p>15 A. I mean, the message they gave us was that they -- and on</p> <p>16 reviewing the emails, this will be made more -- clearly</p> <p>17 more directly to me perhaps in my notes from meetings</p> <p>18 than perhaps I would necessarily recall. Their message</p> <p>19 was, "We see you as a visitors organisation, not -- we</p> <p>20 don't see the need for your wider work, your casework,</p> <p>21 with clients. Therefore, why do you need to see</p> <p>22 somebody in a private room more than this one time? You</p> <p>23 can see them in the visits hall". Where, in fact, there</p> <p>24 are clear limitations, I think -- yeah, there are</p> <p>25 limitations on what can be covered, what support can be</p> <p style="text-align: right;">Page 25</p>	<p>1 A. I was very concerned. I mean, firstly, there remains</p> <p>2 the sort of general point, from our point of view, there</p> <p>3 were a number of reasons why we might want a second or</p> <p>4 more meetings with a client. There might be, for</p> <p>5 example, vulnerabilities, things that they only felt</p> <p>6 able to disclose to us and wouldn't be disclosing to the</p> <p>7 centre in the first instance. There may be issues we</p> <p>8 wanted to explore more, which, in the limited time of</p> <p>9 that -- the drop-in meeting, where we're trying to see</p> <p>10 a number of people, we couldn't see -- couldn't be</p> <p>11 covered. There's a variety of reasons why we wanted --</p> <p>12 would have wanted to do that, why it would have been</p> <p>13 useful to do that. But particularly, I mean, the</p> <p>14 particular aspect, it was concerning as a refusal anyway</p> <p>15 and generally, but particularly here, we have a client</p> <p>16 who is telling us that they are 14, so should not, if</p> <p>17 they are under 18, be in detention. What Ana is</p> <p>18 referring to here is the Refugee Council Children's</p> <p>19 Panel who, at the time, were the main NGO providing</p> <p>20 support across the detention system where there were</p> <p>21 age-dispute cases, who would come in very rapidly, very</p> <p>22 responsively, to look at arrangements for an age</p> <p>23 assessment. This was a very appropriate pathway for us</p> <p>24 to be looking at. So the main purpose of the next</p> <p>25 meeting, as I understood, was to get a form signed so</p> <p style="text-align: right;">Page 27</p>
<p>1 given to somebody, in the visits hall environment.</p> <p>2 Q. You come on in your statement to discuss a further</p> <p>3 occasion in May 2017 -- this is, for the transcriber, at</p> <p>4 paragraphs 31 to 32 on the 2018 statement. You describe</p> <p>5 this further occasion where a request was made to have</p> <p>6 a second meeting with the detained person, and if we can</p> <p>7 bring that up at <GDW000003> page 27, please. This is</p> <p>8 an email from Ana Szopa to you, giving you an update on</p> <p>9 what was going on, and saying that this person met</p> <p>10 a vulnerable 14-year-old boy and that she wanted to have</p> <p>11 a repeat visit because she believed that he was very</p> <p>12 vulnerable and potentially under age and that he</p> <p>13 potentially wanted to disclose something but time had</p> <p>14 run out, and we can see here she quotes what</p> <p>15 Dan Haughton said to her in refusing that request for</p> <p>16 a repeat drop-in. It says:</p> <p>17 "To put it bluntly: no. There has been scrutiny</p> <p>18 from outside and concerns raised about your drop-ins.</p> <p>19 It has developed into a welfare surgery. This is not</p> <p>20 its intended purpose. From the HO's [Home Office's]</p> <p>21 point of view this is not the purpose of your drop-in.</p> <p>22 The detainee has been integrated into the general</p> <p>23 population and is doing well. We have built the support</p> <p>24 plan with him and he likes it."</p> <p>25 What was your reaction to this email from Ms Szopa?</p> <p style="text-align: right;">Page 26</p>	<p>1 that referral could happen. So it seemed very clear.</p> <p>2 So it seemed a very -- yes, a very unreasonable refusal.</p> <p>3 Q. It refers to, here, "scrutiny from outside". What, if</p> <p>4 anything, did you understand that to refer to?</p> <p>5 A. I'm not sure that, at the time, I was clear what that</p> <p>6 meant or where "outside" was.</p> <p>7 Q. You flag in your statement, your 2018 statement, at</p> <p>8 paragraphs 33 to 34, that this person was someone, who</p> <p>9 the inquiry knows as D852, who was the person shown on</p> <p>10 Panorama as being suspected of being under age and</p> <p>11 having been forced to test spice, and obviously it says</p> <p>12 here that he was scared of sharing a room with adults,</p> <p>13 which is also something, I think, which was reflected on</p> <p>14 Panorama. What do you think or what do you say about</p> <p>15 the consequences of this refusal to have a repeat</p> <p>16 drop-in visit?</p> <p>17 A. Yes. I mean, it seems clear to me that they were</p> <p>18 serious. I mean, had we been able to have this visit,</p> <p>19 we would have completed that referral to the</p> <p>20 Refugee Council, who were the most expert, as I say, on</p> <p>21 cases in detention where somebody may be, or was</p> <p>22 believed to be, under 18. They would have responded</p> <p>23 very rapidly. And I'm as confident as I can be that</p> <p>24 their intervention, whether or not it led to a swift</p> <p>25 release from detention, they would have looked quickly</p> <p style="text-align: right;">Page 28</p>

<p>1 at issues like the room-sharing situation. So I'm</p> <p>2 confident that the client was put in a -- was left in</p> <p>3 a vulnerable position that they probably otherwise</p> <p>4 wouldn't have been in.</p> <p>5 Q. It refers here to the fact that Ms Szopa had referred</p> <p>6 him to the Safer Community Team. Ms Pincus told us</p> <p>7 a little bit about that yesterday. Do you know whether</p> <p>8 there was anything -- any quick response or any response</p> <p>9 from the safer community team?</p> <p>10 A. I don't recall, I'm afraid. I don't recall.</p> <p>11 Q. Did you, at the time, have confidence in raising things</p> <p>12 with the Safer Community Team that they would take</p> <p>13 action?</p> <p>14 A. We did -- we certainly did receive things from the Safer</p> <p>15 Community Team. My recollection is, I don't remember</p> <p>16 many detailed responses from the Safer Community Team.</p> <p>17 I remember acknowledgements that they had received the</p> <p>18 concern and passed it on to someone else, but I don't</p> <p>19 remember much follow-up beyond that.</p> <p>20 Q. In your statement, jumping a bit, you also give, just on</p> <p>21 the issue of visits here, an example about a detention</p> <p>22 officer, DCO Gayatri Mehraa, who would challenge staff</p> <p>23 if she thought there was a repeat visit and even</p> <p>24 interrupted a meeting on one occasion. Ms Pincus told</p> <p>25 us yesterday that she was in the meeting that DCO Mehraa</p> <p style="text-align: center;">Page 29</p>	<p>1 you consider it was just G4S who were doing so or</p> <p>2 whether you think the Home Office were also involved in</p> <p>3 this?</p> <p>4 A. I think -- I can go on, you know, in terms of my direct</p> <p>5 communication with management and the meetings that</p> <p>6 I had. Again, my impression was that this was -- that</p> <p>7 management of G4S and the Home Office management</p> <p>8 presence within the centre were very much working in</p> <p>9 sync.</p> <p>10 Q. I'm going to come on a bit later in time to some other</p> <p>11 things. Also, going back in time a little bit, at</p> <p>12 paragraph 18 of your witness statement, you say that G4S</p> <p>13 were highly critical of a member of GDWG staff,</p> <p>14 Naomi Blackwell, having made a witness statement in</p> <p>15 support of a claim for judicial review. We have already</p> <p>16 briefly touched upon that.</p> <p>17 By way of background about that case, although we</p> <p>18 won't refer to the case by its name, to your knowledge,</p> <p>19 was it right that this was a judicial review claim</p> <p>20 advanced on behalf of a detained person at Brook House</p> <p>21 who was severely mentally unwell, lacked mental capacity</p> <p>22 and could not advocate for himself in relation to</p> <p>23 unlawful detention at Brook House?</p> <p>24 A. Yes, that's correct.</p> <p>25 Q. Is it right that Ms Blackwell made a witness statement</p> <p style="text-align: center;">Page 31</p>
<p>1 interrupted. Was that the only occasion you heard of</p> <p>2 her challenging GDWG volunteers or staff or were there</p> <p>3 others as well?</p> <p>4 A. I don't recall meeting -- although I sometimes ran those</p> <p>5 sessions, I don't think I met the officer myself, or met</p> <p>6 her very briefly and didn't have any particular</p> <p>7 concerns. But I was made aware that she had been</p> <p>8 difficult. I heard about the incident with Anna where</p> <p>9 she invaded the meeting and accused us of having</p> <p>10 a second meeting. And I think, if I recall correctly,</p> <p>11 that Ana Szopa also had a very similar experience.</p> <p>12 Q. I'm asked on behalf of Duncan Lewis to ask you what you</p> <p>13 think, if you do have a view on this, the reason for her</p> <p>14 attitude towards GDWG was?</p> <p>15 A. It's hard to answer that. My impression was there was</p> <p>16 a strong hostility there towards us, our presence.</p> <p>17 Q. Did you have any understanding or experience that there</p> <p>18 was any sort of communication from management towards</p> <p>19 DCOs and DCMs about the approach that should or -- that</p> <p>20 should be taken to GDWG?</p> <p>21 A. I don't know that there was.</p> <p>22 Q. Overall, did you consider that G4S were limiting your</p> <p>23 access to detained people?</p> <p>24 A. Yes, yes.</p> <p>25 Q. I'm asked on behalf of Bhatt Murphy to ask you whether</p> <p style="text-align: center;">Page 30</p>	<p>1 as part of that claim setting out her dealings with that</p> <p>2 particular detained person?</p> <p>3 A. Yes, I believe that's correct.</p> <p>4 Q. This was before you were director; yes?</p> <p>5 A. Yes.</p> <p>6 Q. To your knowledge, what happened as a result of</p> <p>7 Ms Blackwell making that witness statement in terms of</p> <p>8 how GDWG were treated?</p> <p>9 A. I mean, my understanding was that it had firstly --</p> <p>10 I think that was around October 2015, the statement.</p> <p>11 I think that had -- I understood subsequently that had</p> <p>12 prompted conversations that led to the draft memorandum</p> <p>13 of understanding around February 2016. Otherwise, in</p> <p>14 terms of how -- it's difficult to say, without obviously</p> <p>15 being in meetings, you know, internally, what the impact</p> <p>16 was specifically, but I can only reasonably assume that</p> <p>17 it was a very -- that it was a key part of -- either</p> <p>18 a cause of, or an excuse for, some suspicion and</p> <p>19 hostility we were receiving, because it was referred to</p> <p>20 in, I think, more or less every meeting I went on to</p> <p>21 have with the management, even, yeah, meetings that</p> <p>22 weren't -- so meetings towards the end of my time that</p> <p>23 were more amenable, it was still referred to as if this</p> <p>24 is a piece of information that we all have about GDWG.</p> <p>25 Q. Okay. You say, at paragraph 25 of your 2018 statement,</p> <p style="text-align: center;">Page 32</p>

<p>1 that Neil Davies, who I think we said was head of visits</p> <p>2 at Brook House when you first started, told you,</p> <p>3 in July 2016, that he didn't want people providing</p> <p>4 witness statements in support of detainees' legal cases.</p> <p>5 Was that said explicitly?</p> <p>6 A. Yes. I recall him saying words to the effect of, but</p> <p>7 more or less these words, "We see you have been doing</p> <p>8 social visits, no case work, not standing as sureties</p> <p>9 and not giving witness statements".</p> <p>10 Q. Was any reason given for that?</p> <p>11 A. I don't recall any reason being given for that.</p> <p>12 Q. You have said in evidence and you say in your statement</p> <p>13 that this issue was raised repeatedly and you say in</p> <p>14 your statement, actually, that this was raised,</p> <p>15 including by the Home Office, up to and including the</p> <p>16 meeting with Michelle Smith in January 2018; is that</p> <p>17 right?</p> <p>18 A. That's correct.</p> <p>19 Q. I'm asked on behalf of Bhatt Murphy to ask if you have</p> <p>20 a view as to why you think it was repeatedly raised?</p> <p>21 A. I think that the meeting you're referring to in 2018 --</p> <p>22 I mean -- well, the prior meetings, I think it was being</p> <p>23 described to me as one of the -- as an example of GDWG</p> <p>24 having stepped over a particular line. In the 2018</p> <p>25 meeting in relation to Tinsley, that was nothing to do</p> <p style="text-align: center;">Page 33</p>	<p>1 have discussed -- if there had been a further request</p> <p>2 for a witness statement from a solicitor in relation to</p> <p>3 a particular client, we would have discussed it and done</p> <p>4 it if it felt appropriate to do so.</p> <p>5 Q. So during the relevant period, if that had come up in</p> <p>6 a relevant case, you feel like you could have done so,</p> <p>7 if it was appropriate to do so, in your view?</p> <p>8 A. Yes, yes.</p> <p>9 Q. Now, we have already discussed the memorandum of</p> <p>10 understanding, but just so that we can follow this</p> <p>11 chronologically, you had another meeting in June 2017 to</p> <p>12 discuss that draft memorandum of understanding. You set</p> <p>13 that out at paragraph 38 of your 2018 statement.</p> <p>14 I think, prior to that meeting, you'd requested that you</p> <p>15 be accompanied at that meeting by somebody called</p> <p>16 Ali McGinley of the Association of Visitors to</p> <p>17 Immigration Detainees; is that right?</p> <p>18 A. That's correct, yes.</p> <p>19 Q. If we can bring up, please, <GDW000003>, page 18,</p> <p>20 firstly, why did you want to be accompanied by</p> <p>21 Ali McGinley?</p> <p>22 A. So, as you said, Ali is -- was and is the director of</p> <p>23 the Association of Visitors to Immigration Detainees --</p> <p>24 AVID -- who are an umbrella body supporting groups</p> <p>25 visiting people in detention around the UK. Their role</p> <p style="text-align: center;">Page 35</p>
<p>1 with Brook House and it wasn't, from my recollection,</p> <p>2 a difficult meeting, it was a positive meeting towards</p> <p>3 setting up a new drop-in space. It was referred to</p> <p>4 relatively in passing but as something that we know</p> <p>5 about GDWG where you've stepped over a line in the past.</p> <p>6 Q. Other --</p> <p>7 A. The impression -- sorry.</p> <p>8 Q. No, no.</p> <p>9 A. The impression I had was that, "This is quite a wide --</p> <p>10 this is a widely-known piece of information that we know</p> <p>11 as the wider management team across the IRCs".</p> <p>12 Q. Is it fair to say that they saw this as an example of</p> <p>13 something negative that you'd done and you didn't see it</p> <p>14 like that?</p> <p>15 A. Absolutely, that's correct, yes.</p> <p>16 Q. Other than your own statement, which I'm referring to,</p> <p>17 from 2018, are you aware in your time at GDWG whether</p> <p>18 staff provided statements in any other litigation in</p> <p>19 support of detained people between 2015 and 2018?</p> <p>20 A. To my recollection, I don't recall us doing so.</p> <p>21 Q. Did you ever tell them -- tell your staff or your</p> <p>22 visitors not to do so?</p> <p>23 A. No. It wasn't, as a matter of practice, something we</p> <p>24 would normally do, although I don't remember there ever</p> <p>25 being any kind of rule around it. And I think we would</p> <p style="text-align: center;">Page 34</p>	<p>1 is -- can be to train up new visitors groups and support</p> <p>2 visitors groups to gain access to centres. I knew</p> <p>3 anecdotally that there had sometimes been issues with</p> <p>4 access at Gatwick IRCs and other centres, and AVID would</p> <p>5 sometimes work with the local group. So I wanted -- and</p> <p>6 Ali was very diplomatic and skilled at those</p> <p>7 conversations and in providing assistance and I was,</p> <p>8 I think, you know, reflecting on the fact that the last</p> <p>9 meeting had been difficult, there had been, since then,</p> <p>10 some refusals of second visits, so things seemed to be</p> <p>11 deteriorating and I felt a back-up and support in that</p> <p>12 meeting would be useful.</p> <p>13 Q. Obviously we can see here that your suggestion to be</p> <p>14 accompanied was refused by Stephen Skitt, saying:</p> <p>15 "In regards to attendance, this meeting is to</p> <p>16 discuss an MoU with yourselves and a number of local</p> <p>17 issues that involve your staff support, and I do not</p> <p>18 feel it appropriate to involve other organisations at</p> <p>19 this point, you can of course outside of this speak with</p> <p>20 AVID and they can offer you some advice."</p> <p>21 What was your response or how did you feel upon</p> <p>22 receiving this response?</p> <p>23 A. I was disappointed because I felt it might be an</p> <p>24 important back-up for me in the meetings but also</p> <p>25 a useful kind of expert view in the room for the</p> <p style="text-align: center;">Page 36</p>

<p>1 discussions. So I was disappointed by that response.</p> <p>2 Q. Looking at the meeting that did take place in June, you</p> <p>3 say at paragraph 39 of your 2018 statement that, at that</p> <p>4 meeting, Steve Skitt complained that GDWG were</p> <p>5 requesting repeated meetings and that -- and he implied</p> <p>6 that you were offering counselling. Why do you think</p> <p>7 Brook House or management were concerned about you using</p> <p>8 the drop-in surgeries to do casework or counselling?</p> <p>9 A. I think, on the counselling point, if I may take that</p> <p>10 first, I'm not -- to be honest, I'm not sure why they</p> <p>11 would think that would be the case. I didn't -- was</p> <p>12 never presented with any evidence as to that. We were</p> <p>13 clear we were not counsellors, and that was made clear</p> <p>14 to all staff, all volunteers, even if they happened to</p> <p>15 have, you know, in other parts of their life, experience</p> <p>16 around therapeutic support. And I had no -- I don't</p> <p>17 believe, or I was never given any evidence, that that</p> <p>18 was happening. So I couldn't say what that was, other</p> <p>19 than we were raising, you know, in terms of our reasons</p> <p>20 for seeing -- wanting to see clients for a second time</p> <p>21 at the drop-in, sometimes we were referencing exploring</p> <p>22 mental health issues, but that would have been to</p> <p>23 provide for appropriate, emotional, first-hand support</p> <p>24 but also to refer on to other specialist agencies. So</p> <p>25 I'm unsure about that.</p> <p style="text-align: center;">Page 37</p>	<p>1 now we were getting -- not just being told, "You must</p> <p>2 request every time", but also being told, "You're</p> <p>3 requesting this too much", so I was concerned by that</p> <p>4 direction.</p> <p>5 Q. You just said there, just to clarify, that there was an</p> <p>6 increasing sort of worsening of the tone of meetings; is</p> <p>7 that right? That you felt that this was just getting</p> <p>8 worse with each meeting?</p> <p>9 A. Yes. Yes, that's correct.</p> <p>10 Q. If we can bring up page 29 of this document, please,</p> <p>11 this is an email sent by you, Mr Wilson, the week after</p> <p>12 the meeting. If we can go to the bottom half of</p> <p>13 the page. You say in the bottom paragraph here:</p> <p>14 "... grateful to Steve for raising the concern about</p> <p>15 our implying the provision of counselling, and was sorry</p> <p>16 we weren't able to finish this conversation. If you</p> <p>17 feel that we had somehow stepped over a line of what is</p> <p>18 acceptable, please do let me know. We are not</p> <p>19 counsellors and are clear that we are not providing</p> <p>20 a therapeutic or psychiatric service to detainees.</p> <p>21 However, being a listening ear, a befriender, and a form</p> <p>22 of emotional support for detainees who need someone to</p> <p>23 talk to is at the core of what we do. The distinction</p> <p>24 between providing emotional support and befriending, as</p> <p>25 opposed to counselling, feels clear to me (one I am very</p> <p style="text-align: center;">Page 39</p>
<p>1 In terms of the wider point around casework, they</p> <p>2 seemed to have -- there seemed a deep, ongoing suspicion</p> <p>3 about doing casework, about doing anything, from their</p> <p>4 point of view, more than social visits and giving very</p> <p>5 practical things that we did, like second-hand clothing.</p> <p>6 If I might add, I was never clear why that suspicion</p> <p>7 was there around casework, because we were very clear,</p> <p>8 and I spelt out to them, we were not solicitors, we were</p> <p>9 not OISC regulated, we weren't giving that kind of</p> <p>10 advice, we were referring and signposting on. So, for</p> <p>11 a variety of reasons, I never understood the basis for</p> <p>12 that suspicion.</p> <p>13 Q. How would you, looking back, describe the tone of that</p> <p>14 meeting in June 2017?</p> <p>15 A. I think it was in -- the pattern of meetings over those</p> <p>16 few months was becoming increasingly difficult. It was</p> <p>17 difficult. I think I felt that -- I think I felt that,</p> <p>18 after the last meeting, after the March meeting. I had</p> <p>19 responded on the two -- they raised two other issues,</p> <p>20 which I was able to respond to. And I had agreed that</p> <p>21 we would seek agreement for the second visits, second</p> <p>22 drop-in appointments, so I'd hoped we'd reached</p> <p>23 a reasonable point at that -- that things were</p> <p>24 deteriorating, we then had second visits being turned</p> <p>25 down, and it seemed that things were worsening because</p> <p style="text-align: center;">Page 38</p>	<p>1 familiar with from other jobs and from being a volunteer</p> <p>2 with Samaritans elsewhere). If we need to discuss</p> <p>3 further, though, please do say."</p> <p>4 Did you feel at this time that G4S genuinely thought</p> <p>5 you were crossing the line over to providing counselling</p> <p>6 or did you think this was being used as some sort of</p> <p>7 excuse?</p> <p>8 A. Taken alongside the other concerns they were</p> <p>9 increasingly raising, it felt like an excuse. But,</p> <p>10 again, particularly because I don't think I -- I'm not</p> <p>11 sure whether I had a response to this particular email.</p> <p>12 I'm clear I don't think I was ever presented with</p> <p>13 evidence that we were providing counselling or a basis</p> <p>14 for that.</p> <p>15 Q. You say at the end here, as we can see, "Thank you very</p> <p>16 much again for your ongoing support". What should we</p> <p>17 take from that?</p> <p>18 A. I mean, I was seeking to be as diplomatic as possible,</p> <p>19 and I did -- would -- I was still -- I wanted there to</p> <p>20 be a conversation. So I wanted the issues, when they</p> <p>21 came up, to be raised to me as much as possible. There</p> <p>22 was a lot I was frustrated about with those</p> <p>23 conversations but I was grateful for the dialogue.</p> <p>24 Q. Did you feel like you were getting ongoing support?</p> <p>25 A. I don't think I would -- I wouldn't -- no. I don't</p> <p style="text-align: center;">Page 40</p>

<p>1 think that would be quite accurate.</p> <p>2 Q. In paragraph 42 of your 2018 statement, you say that at</p> <p>3 the time -- sorry, that the time at the meetings -- so</p> <p>4 we have been through a couple of them -- was being</p> <p>5 almost entirely taken up by complaints about GDWG and</p> <p>6 that you tried to encourage quarterly meetings and for</p> <p>7 them to provide you with a list of issues for discussion</p> <p>8 in advance which could allow you to prepare for meetings</p> <p>9 by consulting colleagues.</p> <p>10 Now, we will be able to see later that you set that</p> <p>11 out in a letter after the relevant period, I think,</p> <p>12 in September 2017. Did you make that proposal about the</p> <p>13 quarterly meetings and the list of concerns in advance</p> <p>14 prior to that? Do you know?</p> <p>15 A. I don't recall. I think -- from memory, I made that</p> <p>16 suggestion a few times, maybe in meetings rather than in</p> <p>17 writing. But I can't recall, I'm afraid.</p> <p>18 Q. You say at paragraph 42:</p> <p>19 "I tried to encourage them to set up quarterly</p> <p>20 meetings and to provide me with a list of issues for</p> <p>21 discussion in advance so that I could prepare for</p> <p>22 meetings (including by consulting with colleagues</p> <p>23 involved) but I got no response."</p> <p>24 Is that right that you suggested it but didn't</p> <p>25 really receive a response?</p> <p style="text-align: center;">Page 41</p>	<p>1 that was June 2017, and then you come on in your</p> <p>2 statement at paragraph 44 to discuss a further meeting</p> <p>3 that you had a couple of months later in August 2017</p> <p>4 with Steve Skitt and Paul Gasson. You note in your</p> <p>5 statement that Steve Skitt and Paul Gasson said they</p> <p>6 were seriously considering ending the drop-in surgeries</p> <p>7 altogether. Did they give you a reason for that?</p> <p>8 A. In the meeting itself?</p> <p>9 Q. Yes.</p> <p>10 A. Yes, they -- to a point, they referred to recent</p> <p>11 incidents where they felt we had, in their view, stepped</p> <p>12 over a particular line, and the impression that they</p> <p>13 were giving was that we were -- we had repeatedly -- or</p> <p>14 we were increasingly going over a particular line and</p> <p>15 that, therefore, it should be taken away.</p> <p>16 Q. If we can go through some of the things that you have</p> <p>17 set out in your statement that occurred at this meeting,</p> <p>18 or that you say occurred at this meeting, one of</p> <p>19 the things you say at paragraph 45 is that Steve Skitt</p> <p>20 complained about two emails sent by your advocacy</p> <p>21 coordinator, Ms Szopa, in August 2017, about a detained</p> <p>22 person who had burn injuries. If we can turn -- for the</p> <p>23 record, the emails are at <GDW000003> pages 36 to 37,</p> <p>24 but I think you summarise it in your witness statement</p> <p>25 at paragraph 45.</p> <p style="text-align: center;">Page 43</p>
<p>1 A. What I was increasingly feeling was, you know,</p> <p>2 I welcomed the conversations but they were happening</p> <p>3 very reactively. I think it's the case that in between</p> <p>4 some of these meetings, maybe going back before the</p> <p>5 relevant period into, say, the autumn of 2016, I think</p> <p>6 I'm right in saying that I was -- there were maybe times</p> <p>7 when I suggested a meeting and got no response and then</p> <p>8 would get a response at a time later when there was</p> <p>9 a particular issue they wanted to discuss. So it was</p> <p>10 both -- it was very reactive. It meant that the</p> <p>11 general -- the fact that generally they would give me</p> <p>12 little information before the meetings meant that</p> <p>13 I was -- would be limited and put in a difficult</p> <p>14 position in the meeting itself. I also wanted, in my --</p> <p>15 I wanted the meeting to be a positive, regular space</p> <p>16 where I could also say, you know, "We are seeing these</p> <p>17 issues. How can we work together to resolve them?"</p> <p>18 I wanted it to be as constructive as possible.</p> <p>19 Q. Anna Pincus said yesterday that she thought that G4S</p> <p>20 wasn't a listening organisation. Do you have a view on</p> <p>21 that?</p> <p>22 A. I think certainly the impression that I had from those</p> <p>23 meetings was that that was not the -- I never felt that</p> <p>24 that was what they were seeking to do.</p> <p>25 Q. I'm going to move on, again, a little bit in time, so</p> <p style="text-align: center;">Page 42</p>	<p>1 You say that Ms Szopa had explained she met the</p> <p>2 detained person at the drop-in surgery the day before,</p> <p>3 that his legs and feet had been burnt in a house fire</p> <p>4 ten years previously and he could not walk for more than</p> <p>5 a few minutes, was falling frequently on the stairs,</p> <p>6 could not access the shower or meals unless assisted and</p> <p>7 other detainees had to bring food to him. She asked if</p> <p>8 he could be provided with crutches or a wheelchair as</p> <p>9 soon as possible and suggested that GDWG could provide</p> <p>10 crutches if cost was an issue. She also requested that</p> <p>11 he be referred to an occupational therapist. As she</p> <p>12 received no response, she sent a remainder email on</p> <p>13 15 August 2017, stressing that the detained person was</p> <p>14 in a lot of pain and could not do basic things such as</p> <p>15 shower or carry food on a tray without help from others.</p> <p>16 She commented that he was in a wheelchair before he was</p> <p>17 detained but had been told he was not allowed to bring</p> <p>18 it into the centre with him.</p> <p>19 If we can just bring up page 36, please. The</p> <p>20 response to this email from Michael Wells, who is listed</p> <p>21 as healthcare practice manager at Brook House, ccing in</p> <p>22 the Safer Community Team, Steve Skitt, Dan Haughton and</p> <p>23 yourself, says:</p> <p>24 "Many thanks for your email stressing your</p> <p>25 concern ... I can confirm that the healthcare department</p> <p style="text-align: center;">Page 44</p>

<p>1 are aware of this patient and are caring for his medical 2 needs on site."</p> <p>3 What was your response upon receiving that email 4 three days prior to the meeting?</p> <p>5 A. We were -- I remember being very concerned. I had 6 spoken with Ana Szopa about her concerns about this 7 particular client and the very bad state he appeared to 8 be in. He needed additional support as a matter of 9 urgency, so this seemed a very limited and unreassuring 10 response.</p> <p>11 Q. You say in your witness statement that at the meeting -- 12 so it's three days after this, I believe -- Mr Skitt 13 accepted that this concern had been raised through the 14 appropriate channel but was strongly critical of what he 15 described as the "aggressive" tone and wording of 16 the email, that it was patronising and that GDWG were 17 inappropriately taking the detained person's story at 18 face value. Did you agree with what Mr Skitt was 19 saying?</p> <p>20 A. I strongly disagreed with it. I mean, on tone, that's 21 something only one -- you know, one can assess 22 individually on tone in an email, but, for me, the email 23 was entirely polite and professional and appropriate.</p> <p>24 In terms of that point around believing a client's 25 account, I think this was raised more than once to me in</p> <p style="text-align: center;">Page 45</p>	<p>1 paragraph 48 -- it is actually at 49, that Mr Gasson 2 from the Home Office's criticism was that Ms Blackwell 3 had described the detainee as a "boy" and that she 4 appeared to accept his account of being under age. Does 5 that feed into the thing you were just talking about 6 there about taking things at face value?</p> <p>7 A. Yes.</p> <p>8 Q. You note that both Mr Gasson and Steve Skitt were 9 adamant that it was inappropriate to ask the IMB to 10 intervene on behalf of detainees. Did you think that it 11 was appropriate to do so?</p> <p>12 A. I thought, firstly, that it was appropriate for us to 13 raise individual clients' situations with the IMB and, 14 secondly, I think maybe -- it sounds like we will come 15 on to this, but if a particular request to the IMB was 16 inappropriate, then the IMB would have a right to tell 17 us that. But I didn't see why it was a matter for 18 management.</p> <p>19 Might I just add something to my previous answer 20 just in relation to Ana Szopa's request and the client 21 who was badly burnt? There is another thing to say 22 there in terms of, the client's account was, in this 23 case -- this wouldn't always be the case because a lot 24 of contact with our clients was by phone, but she'd met 25 him at the surgery, she'd seen visibly -- I think he</p> <p style="text-align: center;">Page 47</p>
<p>1 these meetings as an aside, that we took the client's -- 2 the accusation, I suppose, was we just took the client's 3 story at face value. It's difficult to know how to 4 respond to that because we were responding -- that was 5 our role, to assist clients, and so we would be, on the 6 face of it, taking things at face value insofar as we 7 understand this person has a concern and we are 8 following up on it. Every staff and volunteer 9 understands more -- understood there was -- there could 10 be more to a story, that the client might misunderstand 11 something or a client might occasionally be embellishing 12 something. There was that understanding. So we were 13 always very careful how we made referrals and we 14 couldn't verify the truth of anything but we were acting 15 on what we knew. So I never really understood that 16 point.</p> <p>17 Q. You say, at paragraph 48 of your statement, that at the 18 meeting in August 2017, Brook House also took great 19 exception to an email which a member of GDWG staff had 20 sent to the IMB asking whether the IMB could check 21 whether a request for a transfer to Tinsley House could 22 be addressed by them. We will deal a little bit later 23 with the IMB's response to that, but just looking at the 24 fact that this was raised by G4S and the Home Office at 25 this meeting, I think you say in your statement at</p> <p style="text-align: center;">Page 46</p>	<p>1 described him struggling into the room really not being 2 able to walk. There is no reason why she would 3 exaggerate that or seek to inflate that. She was acting 4 on genuine concern. I have no doubt about that.</p> <p>5 Q. Thank you, Mr Wilson. Just on this point about raising 6 things with the IMB, you say in your statement that you 7 were told, I think by Mr Skitt, that disapproval of your 8 referrals to the IMB had "got as high as board level at 9 Brook House". What did you take that to mean?</p> <p>10 A. I remember being concerned but also frankly mystified by 11 it. Again, I didn't see why it was a matter for 12 management. I didn't see why us raising what was 13 just -- it was a request to IMB, was a matter for anyone 14 other than us and the IMB. It wasn't clear.</p> <p>15 Q. Do you have any insight as to what "board level" means? 16 Because we know that Mr Skitt was deputy director, so he 17 is the second-in-command. Do you know what that means?</p> <p>18 A. No, I wasn't clear on that.</p> <p>19 Q. You also say at paragraph 50 of your statement that you 20 were told during this meeting that you shouldn't be 21 referring detained people on to other agencies, such as 22 RAPT or, as they are now known, or were known, the 23 Forward Trust or any other organisations. Was there any 24 main reason given as to why you shouldn't be referring 25 people on to other agencies?</p> <p style="text-align: center;">Page 48</p>

1 **A. I think that there was some message there around IMB in**
 2 **particular, around us perhaps misunderstanding IMB's**
 3 **role. Again, I thought that was a matter for the IMB.**
 4 **I think, in terms of RAPT, the drug support charity, the**
 5 **message that I was given was that they are -- "These**
 6 **issues are considered on induction into the centre. We**
 7 **will take care of those referrals, you don't need --**
 8 **these needs are being taken care of". I think -- sorry,**
 9 **I was just going to add, I think something that was, if**
 10 **not explicitly spelt out, but the language here became**
 11 **much broader than -- was also broader than "Don't refer**
 12 **to IMB or don't refer to RAPT". I think Steve Skitt**
 13 **used more or less words along the lines of, "You are**
 14 **making referrals", full stop. By implication, that**
 15 **would imply that any referrals were becoming, they**
 16 **considered, inappropriate. So whether regular referrals**
 17 **we might make to Medical Justice, Bail for Immigration**
 18 **Detainees, even organisations such as Red Cross or**
 19 **Samaritans who had some presence in the centre.**
 20 **Q. Just talking about referrals, because you said that**
 21 **their approach was that, "People are told about RAPT and**
 22 **the Forward Trust at the time of their induction, so you**
 23 **can leave that to us". I asked Ms Pincus this**
 24 **yesterday, but do you have any understanding about what**
 25 **detained people were told about GDWG upon induction?**

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1 **A. I'm not sure -- I'm not certain on that.**
 2 **Q. Now, you refer at paragraph 51 of your statement, your**
 3 **2018 statement, to some other discussions at that**
 4 **meeting and you note that Steve Skitt expressed the view**
 5 **that he thought that you didn't seem to think that**
 6 **Brook House management was doing the best for detainees.**
 7 **Did you think that Brook House management was doing the**
 8 **best for detainees?**
 9 **A. No. It's fair to say we had significant concerns about**
 10 **that. What we were certain of, from the range of our**
 11 **experience throughout and before and after the relevant**
 12 **period, is that there were a large -- we hadn't -- there**
 13 **were a large number of concerning things happening in**
 14 **terms of clients' cases and the support they were**
 15 **receiving. It doesn't mean that in every case the fault**
 16 **was with management, but there were a number -- concerns**
 17 **were coming up increasingly. So the message made,**
 18 **I think, really clear at this meeting was that they --**
 19 **that I was being given in more or less these words was,**
 20 **"You are being insulting. You are implying we don't**
 21 **have all of these things covered", and we knew that**
 22 **there were needs not being met, we knew that there were**
 23 **things, through whatever reason, not being picked up and**
 24 **we were trying to refer appropriately, and I didn't**
 25 **understand, and don't understand, what the issue was**

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1 **with us doing that.**
 2 **Q. You also note that you were accused of "raising the**
 3 **expectations of detainees as to what they could expect**
 4 **from Brook House management". What did you take that to**
 5 **mean?**
 6 **A. I don't know what that was based on. No, I don't know**
 7 **what that was based on. I am confident that we would**
 8 **always -- we would always be careful about managing**
 9 **expectations wherever we were raising a particular issue**
 10 **to, because we knew, whether we were referring to**
 11 **another NGO or to healthcare or to management, there**
 12 **were limitations in what -- you know, what the response**
 13 **that we might get or what might be possible. So I --**
 14 **yeah.**
 15 **Q. You say at paragraph 52 of your statement:**
 16 **"I repeatedly pointed out that it was legitimate for**
 17 **GDWG to raise concerns about detainees. This drew**
 18 **a heated response that we were not doing this 'in the**
 19 **right way'. I said that if I received a complaint about**
 20 **GDWG's work, for example, from someone who had been**
 21 **turned down for a voluntary role, I would respond to the**
 22 **complaint, so what was the issue with Brook House**
 23 **management acting in the same way? Mr Skitt's response**
 24 **was, 'But are you being audited?' I thought this was**
 25 **telling. I took it as an important indication of what**

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1 **was motivating their attitude to this."**
 2 **What do you mean by "I thought it was a telling and**
 3 **important indication of what was motivating their**
 4 **attitude"?**
 5 **A. Well, I think it seemed a very strange comment, the**
 6 **comment about being audited. It seemed to imply they**
 7 **felt under pressure about how they were running the**
 8 **centre and that this was causing more aggravation.**
 9 **I just didn't -- as I said at the time, I didn't**
 10 **understand where that was coming from because, surely,**
 11 **any organisation, any body, should welcome complaints.**
 12 **If it thinks the complaint is unfounded, it can respond**
 13 **to say that. It should investigate properly and then**
 14 **respond to say that.**
 15 **I didn't understand the issue and I didn't**
 16 **understand the suggestion that we were doing so -- to**
 17 **start with, around the complaints, I thought that was**
 18 **entirely legitimate for us to do, and I was never given**
 19 **any evidence of us doing so, when we did so, in any way**
 20 **that seemed anything other than very respectful and**
 21 **polite.**
 22 **Q. You say here, "I took it as an important indication of**
 23 **what was motivating their attitude". What did you think**
 24 **was motivating their attitude or what was the**
 25 **indication?**

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13 (Pages 49 to 52)

<p>1 A. I thought that they -- I felt that they felt under 2 pressure. I couldn't say from where, but they felt 3 under pressure to be seen to be covering or to be -- how 4 they -- all needs met or all safeguarding concerns 5 addressed in an appropriate way and that us doing this 6 was undermining that in some way. 7 Q. Do you know what they meant by "being audited"? 8 A. No, I assume that related to their contract with the 9 Home Office in terms of running the centre. 10 Q. I have already asked you a little bit about this, but 11 you say that, at this meeting, they repeatedly said they 12 might end GDWG's drop-in sessions and surgeries and that 13 you were left in no doubt this might happen if you 14 raised any further concerns. Was this threatened 15 explicitly? 16 A. Yes, very explicitly and repeatedly. 17 Q. You say in your statement that this had an obvious 18 impact on you, presumably personally and as an 19 organisation, and must have been intended to do so. 20 What do you think that intention was? 21 A. I felt, and this is a reflection I've had more since, 22 but I remember it very vividly coming out of 23 the meeting, that there was a dynamic, in that room in 24 particular, in that moment, that meeting, that was 25 tantamount to bullying towards me and towards GDWG and</p> <p style="text-align: center;">Page 53</p>	<p>1 with the Home Office? 2 A. I'm so sorry, do you mind repeating the question? 3 Q. Yes. The suggestion is that Mr Gasson expressed during 4 that meeting that a key issue for the Home Office was 5 that concerns were being raised by your organisation 6 about detainees but not being shared with the IRC or 7 with the Home Office. So, presumably, that they were 8 being raised with other people and not shared with the 9 IRC or the Home Office? 10 A. I don't recall that being explicitly said. It was -- in 11 some ways, it seemed at that meeting, and I wouldn't 12 draw a distinction between G4S and the Home Office in 13 terms of who was giving this message, it was very much 14 both were leading the meeting, giving the same message. 15 They seemed to be objecting to both things, to both us 16 referring to other agencies, where, again, we felt that 17 was entirely appropriate to do, and to us having raised 18 direct things to IRC management. 19 Q. If we can bring up on screen <GDW000008>, please. 20 Chair, that's at tab 5 of your bundle. If we can just 21 enlarge all of the text, please. This is an email which 22 you sent at 4.16 pm. Was it an email that was sent to 23 colleagues at GDWG? 24 A. Yes. 25 Q. It says:</p> <p style="text-align: center;">Page 55</p>
<p>1 the organisation. I felt I was being almost toyed with. 2 I think the threat was being -- they raised it 3 repeatedly during the meeting. It was a very heated 4 meeting. I remember both Steve Skitt and Paul Gasson 5 being very heated, shouting at points. I was in the 6 meeting on my own. It felt a very difficult one. I -- 7 my focus and my top priority on behalf of 8 the organisation was -- and this was very much at the 9 forefront of my mind -- access to the centre is so vital 10 to what we do. If we lose that, we lose -- you know, we 11 lose what we -- you know, that's what we are able to do. 12 We provide -- we can only provide any kind of emotional 13 and practical support to clients if we have some access 14 to the centre. They are now threatening taking away a 15 major part of that. In my head was very clearly, 16 "I must get out of this room without that having 17 happened. I need to ..." and I think I use this 18 language in my statement, that I almost felt I needed 19 to -- was in a position of having to beg for that access 20 to continue. 21 Q. I'm asked to ask you this on behalf of the Home Office. 22 During this meeting, do you recall if Mr Gasson 23 expressed that a key issue for the Home Office was that 24 concerns were being raised about detainees by your 25 organisation but were not being shared with the IRC or</p> <p style="text-align: center;">Page 54</p>	<p>1 "... this sort of thing is why it's nice to lighten 2 the mood with baby news, et cetera ... 3 "I just a pretty gruelling meeting with Brook 4 management. The continuation of the drop-ins is on 5 something of a knife-edge. 6 "For the time being, if you are considering raising 7 any concerns with G4S (including healthcare) or with any 8 of the agencies that work within Brook or Tinsley House 9 (IMB, RAPT, et cetera), please let me know and we can 10 discuss -- I've offered to make any necessary contacts 11 for the next few weeks. In other words, [this is in 12 bold] please make sure any concerns raised are going 13 through me. 14 "I realise this sounds quite draconian but it's 15 a serious situation." 16 You say: 17 "No immediate silver lining, but here's that classic 18 video of a baby monkey riding backwards on a pig." 19 Which I'm sure we have all seen. Why did you 20 describe this as "quite draconian"? 21 A. So this was, just to be clear, only four staff members 22 at that time, so this was me and three caseworkers. 23 Q. Is that Anna Pincus, Naomi Blackwell and Ana Szopa? 24 A. That's correct. Because if I had suggested it without 25 context, that would have sounded very controlling.</p> <p style="text-align: center;">Page 56</p>

<p>1 These were three very experienced caseworkers who were</p> <p>2 leading the case. I was doing some casework and client</p> <p>3 work myself because of the size of the organisation, but</p> <p>4 they were leading on it, they were all very capable.</p> <p>5 They wouldn't normally -- they would normally raise</p> <p>6 things of particular issues or safeguarding or</p> <p>7 particular things to me, but they wouldn't be running</p> <p>8 every -- you know, referrals of one type or another are</p> <p>9 a very regular part of casework.</p> <p>10 Q. Is the draconian bit that, previously, they were senior</p> <p>11 enough that they could email people, whereas you were</p> <p>12 now saying, "I have to be the filter for everything that</p> <p>13 goes out"?</p> <p>14 A. Yes. If I had sent this out without context or just</p> <p>15 said this, I think it would have sounded very</p> <p>16 unnecessarily top-down and of a micro-management style</p> <p>17 I would never, unless absolutely necessary, adopt. So</p> <p>18 I needed to explain.</p> <p>19 It may be stating the obvious, but the context was,</p> <p>20 this was an agreement I had made at the end of that</p> <p>21 meeting verbally as, you know, I didn't think it was</p> <p>22 something that was going to be sustainable for very long</p> <p>23 because of the volume -- apart from anything else, the</p> <p>24 volume would have needed me to be signing things off</p> <p>25 very, very frequently.</p> <p style="text-align: center;">Page 57</p>	<p>1 and us having the chance to discuss them."</p> <p>2 What are we to take from your description of it as</p> <p>3 a useful meeting?</p> <p>4 A. Yes. I think I was being polite and diplomatic.</p> <p>5 I mean, the subsequent phrase about raising -- I did</p> <p>6 appreciate them raising concerns directly and us</p> <p>7 discussing them. I would rather that than -- I guess</p> <p>8 the alternative is they just cut access without</p> <p>9 discussing them. But it is a stretch to describe it as</p> <p>10 useful, from our point of view.</p> <p>11 Q. In your inquiry statement, which is, for the</p> <p>12 transcribers, at <DPG000003> at page 3, paragraph 8, you</p> <p>13 describe Mr Gasson and Mr Skitt as having taken</p> <p>14 "a highly combative and distrustful approach at [the]</p> <p>15 meeting". How do you reconcile this description of it</p> <p>16 as a useful meeting with your description of them having</p> <p>17 taken a highly combative and distrustful approach?</p> <p>18 A. Well, I mean, I wanted, and needed, the relationship to</p> <p>19 be as -- for us to be able to progress, so, again, my</p> <p>20 absolute focus was on maintaining our access to the</p> <p>21 centres. So I wanted to be as diplomatic and polite as</p> <p>22 I possibly could be. I felt in a very powerless</p> <p>23 situation. I would go back to my feeling in the meeting</p> <p>24 of almost needing to beg for the access to continue. So</p> <p>25 I was very much in that mode: what can I put in place?</p> <p style="text-align: center;">Page 59</p>
<p>1 Q. So you say "for the next few weeks"?</p> <p>2 A. It was something I agreed in the moment because, again,</p> <p>3 my top priority was to get out of the meeting with our</p> <p>4 access intact.</p> <p>5 Q. I notice you say there -- you don't list there about</p> <p>6 raising any concerns with the Home Office directly. Is</p> <p>7 that -- was that a deliberate omission or did you</p> <p>8 consider that they could have raised something with the</p> <p>9 Home Office directly without going through you?</p> <p>10 A. No. I mean, it would be rare -- we were never --</p> <p>11 I don't think we were ever told to raise -- you know,</p> <p>12 Paul Gasson wouldn't have been our first point -- it</p> <p>13 would have been management, which would usually have</p> <p>14 been Steve Skitt or Dan Haughton. We might have copied</p> <p>15 everyone in. I think -- I would -- maybe I should have</p> <p>16 said explicitly, but where I say "raising any concerns</p> <p>17 with G4S", I meant management plus any other parts of</p> <p>18 G4S.</p> <p>19 Q. So that's then at 4.16 pm. If we can also bring up on</p> <p>20 screen, back to <GDW000003>, page 40, please, this is an</p> <p>21 email which is sent on the same day at 16:37, so about</p> <p>22 20 minutes after the email sent to your colleagues, and</p> <p>23 here you say:</p> <p>24 "Thank you for the useful meeting this afternoon.</p> <p>25 I very much appreciate your raising concerns directly</p> <p style="text-align: center;">Page 58</p>	<p>1 You know, within reason, but what can I put in place</p> <p>2 organisationally now for us to keep the access intact?</p> <p>3 So that was the situation.</p> <p>4 Q. You describe in your inquiry statement, and also you</p> <p>5 have repeated just now, that the approach to GDWG was</p> <p>6 increasingly becoming one that was tantamount to</p> <p>7 bullying. Why do you say that?</p> <p>8 A. That was a dynamic that I felt was increasing there.</p> <p>9 I was particularly -- I was vividly aware of that in</p> <p>10 that meeting, the dynamic. I remember -- I can remember</p> <p>11 the meeting very vividly. I remember it was just -- it</p> <p>12 was Steve Skitt and Paul Gasson who were in the meeting.</p> <p>13 They were nearest the door. I was on my own. They were</p> <p>14 very, very agitated. Very -- as I put it, I felt that</p> <p>15 they were toying with me, they were threatening with</p> <p>16 something, with something -- a very immediate threat to</p> <p>17 our access. I remember it being -- in my recollection,</p> <p>18 it was a dark and rainy day, I remember walking out of</p> <p>19 the centre feeling shaken by the meeting, and I'd had</p> <p>20 meetings before where they had been difficult, but I was</p> <p>21 really shaken by the meeting.</p> <p>22 Q. When you talk about that approach that was tantamount to</p> <p>23 bullying, are you referring to G4S, to the Home Office</p> <p>24 or both?</p> <p>25 A. To both. I didn't feel, again, a distinction between</p> <p style="text-align: center;">Page 60</p>

<p>1 them in the meeting.</p> <p>2 Q. I'm asked on behalf of Duncan Lewis to ask you if you</p> <p>3 have any understanding of why G4S and the Home Office</p> <p>4 became so hostile, as you describe it?</p> <p>5 A. It's difficult. It's difficult to say. Obviously, the</p> <p>6 subsequent development of Panorama puts a context on</p> <p>7 that time, but I didn't know that at the time. Again,</p> <p>8 I -- they were raising things to me, but looked at</p> <p>9 individually, I didn't understand the basis of those</p> <p>10 concerns.</p> <p>11 MR LIVINGSTON: Chair, I think that might be an appropriate</p> <p>12 time to have a break. I probably have another half an</p> <p>13 hour or 45 minutes or so with this witness, and then we</p> <p>14 will move to reading-in after that. So if we could</p> <p>15 perhaps have the half-hour break that we usually have on</p> <p>16 Fridays now.</p> <p>17 THE CHAIR: Shall we begin again at 11.30?</p> <p>18 MR LIVINGSTON: Yes.</p> <p>19 THE CHAIR: Thank you, Mr Wilson. See you at 11.30.</p> <p>20 (10.58 am)</p> <p>21 (A short break)</p> <p>22 (11.30 am)</p> <p>23 MR LIVINGSTON: Thank you, chair.</p> <p>24 Mr Wilson, we have discussed up to the middle</p> <p>25 of August 2017, how your relationship with G4S and the</p> <p style="text-align: center;">Page 61</p>	<p>1 it explicitly or not, a decision, essentially, that you</p> <p>2 came to, or whether it developed or not as well, that</p> <p>3 you would somewhat restrict the amount of work that you</p> <p>4 did for people, somewhat restrict how far you would go</p> <p>5 in order to try to mollify or maintain a relationship</p> <p>6 with G4S and the Home Office. Is that fair?</p> <p>7 A. Yes.</p> <p>8 Q. Looking back on that -- obviously, you could have gone</p> <p>9 one of a few ways, presumably. You could have tried to</p> <p>10 get that balance. You could have just decided, you</p> <p>11 know, "I don't care. I'm just going to keep raising</p> <p>12 everything and we will see what happens" or you could</p> <p>13 have completely acceded to the Home Office and G4S</p> <p>14 requests and stopped raising things at all, if that's</p> <p>15 what they requested. Did you weigh up those options?</p> <p>16 A. That feeling that I described, in terms of me being in</p> <p>17 that particular -- particularly in that August meeting</p> <p>18 and the immediate aftermath, you know, my -- I was just</p> <p>19 absolutely focused on maintaining our access, so we</p> <p>20 were, as you put it, seeking to mollify or to avoid</p> <p>21 antagonising, much as I was confused about the reasons</p> <p>22 for the reaction we were getting, that was a very big</p> <p>23 focus for us.</p> <p>24 I think it's fair to say that Panorama then came out</p> <p>25 soon after that, and I felt this was not something that</p> <p style="text-align: center;">Page 63</p>
<p>1 Home Office developed. I now want to ask you a little</p> <p>2 bit about the impact of that relationship. At</p> <p>3 paragraph 58 of your 2018 statement, you said that the</p> <p>4 behaviour of managers towards GDWG, the criticisms and</p> <p>5 attempts to restrict your visits and the type of work</p> <p>6 that you did, had an impact on the way you advocated for</p> <p>7 detainees. How would you describe that impact?</p> <p>8 A. I think there were a few consequences. So, at that</p> <p>9 point, as of August/September 2017, we felt, I think, as</p> <p>10 I had put it in the email to my staff at the time, it</p> <p>11 felt on a knife-edge in terms of access continuing, so</p> <p>12 we were very conscious of that. So I'm sure that, in my</p> <p>13 mind, and in the staff, whether this was always</p> <p>14 conscious or not, we were holding back on making -- for</p> <p>15 example, in particular, requesting second appointments</p> <p>16 at the drop-in, when that was becoming so difficult. So</p> <p>17 that would then have a direct impact on the client</p> <p>18 because then we were trying to do everything we could in</p> <p>19 a first meeting. It meant we couldn't necessarily give</p> <p>20 the client the space that we would like to. You then --</p> <p>21 you build in complications like having a phone</p> <p>22 interpreter, and it limits very much what you can cover</p> <p>23 in that time. So those kind of consequences were</p> <p>24 affecting a lot of our work.</p> <p>25 Q. Presumably, this is, whether you actually thought about</p> <p style="text-align: center;">Page 62</p>	<p>1 was explicit, and, actually, one of the trends over the</p> <p>2 subsequent time into 2018 was less communication from</p> <p>3 management, certainly far fewer requests for meetings or</p> <p>4 issues being raised. But I felt that that had changed</p> <p>5 the dynamic and the power situation a bit, because it</p> <p>6 felt clear to me, to us, that, at that point, Brook</p> <p>7 management would surely be -- there was fallout</p> <p>8 happening from Panorama, and would be relatively on the</p> <p>9 back foot, so there was a change in dynamic. That was</p> <p>10 a transition point. I do reflect a lot, I do reflect on</p> <p>11 that period and that dynamic that I do think had become</p> <p>12 increasingly one of a bullying dynamic towards me, as an</p> <p>13 individual, but the organisation in particular, and I do</p> <p>14 think, you know, in the relevant period and after and</p> <p>15 before, should we have been different? And my instinct</p> <p>16 is, there is a cliché around, a truism around -- you</p> <p>17 know, if you're the victim standing up to a bully, they</p> <p>18 will often back down. Should we have been more</p> <p>19 forthright, should we have pushed more things?</p> <p>20 Instinctively, I feel maybe I wish at some level we had,</p> <p>21 but, then again, I don't know where that would have led</p> <p>22 to and there were very good reasons why I and</p> <p>23 my predecessor I think felt we had to mollify, pacify,</p> <p>24 because we were so focused on keeping access and, on the</p> <p>25 face of it, they had the power.</p> <p style="text-align: center;">Page 64</p>

<p>1 Q. Was there any -- "dissent" is maybe putting it too 2 highly, but were there any people within GDWG who 3 disagreed with your approach?</p> <p>4 A. I don't -- I wouldn't say that I remember anyone 5 disagreeing, as such. I would say -- I think I would -- 6 I think that the casework team and any visitors, where 7 this is appropriate, would want to be raising particular 8 things and pushing more, where possible. I think there 9 was clear understanding of the situation we were in and 10 why we were where we were.</p> <p>11 Q. Okay.</p> <p>12 A. I would understand if they had frustrations at points 13 around my willing -- my, small c, conservative 14 reluctance to raise certain things but I think they 15 understood why we were having to do that.</p> <p>16 Q. Jamie MacPherson, one of the visitors at the time, and 17 I think still, gave evidence on Wednesday and said that 18 he understood that you had been told that it was not 19 GDWG's place to make complaints about healthcare and 20 that you were told, in no uncertain terms, that visitors 21 should stay out of it and stick to visiting. Does that 22 accord with your recollection?</p> <p>23 A. I can't remember which -- in terms of a management 24 conversation, which that relates to particularly, but 25 that's certainly the impression I was being given, yes.</p> <p style="text-align: center;">Page 65</p>	<p>1 particular client details.</p> <p>2 Q. I suppose, more broadly, then, because I think you've -- 3 you state in one of your statements that -- perhaps it 4 was in evidence somewhere else -- you found it shocking 5 when you saw it. Were you surprised about the type of 6 mistreatment that was shown on Panorama?</p> <p>7 A. I don't know whether maybe shocked but not surprised is 8 coherent as a reaction. I think we heard anecdotally 9 from clients about issues with officers. You know, 10 there would be -- you know, issues within the centre; 11 references to mistreatment. Sometimes, and maybe quite 12 often, not by the client who allegedly experienced this, 13 but by a third party mentioning things.</p> <p>14 I can't remember -- I'm sorry, I'm having to talk 15 generally just because I can't refresh myself on the 16 details, but that was something that was quite often the 17 case. We wouldn't know -- we would often be very much 18 aware, going back to that point around taking what the 19 client says at face value, that we didn't know the full 20 story. Clients would often say, or friends of clients 21 would say specifically explicitly, "I don't want this to 22 be raised but this is happening, I'm letting you know". 23 So there wouldn't really be -- unless we felt a certain 24 threshold -- much we could do without being much more 25 explicit. What was shocking was seeing it happening so</p> <p style="text-align: center;">Page 67</p>
<p>1 Q. I'm going to come on to your personal and organisational 2 awareness of what was seen on Panorama. Firstly, before 3 Panorama was shown, were you aware of any of 4 the specific incidents of mistreatment which were 5 featured, even if you didn't witness them yourself, 6 obviously?</p> <p>7 A. To my recollection, no, not specifically.</p> <p>8 Q. Did you have any -- when did you first learn that 9 Panorama was going to be broadcast? Do you remember?</p> <p>10 A. As I recall, we knew a few days -- I think the Panorama 11 was on the Monday night. I think we knew during the 12 previous week there was a Panorama about detention 13 coming up. I think we found out -- I can't remember 14 how, but it was to feature Gatwick, in particular, very 15 late on, maybe three days before, no more than that.</p> <p>16 Q. The first time you -- was the first time that you learnt 17 of the contents when you saw it?</p> <p>18 A. Was watching it, absolutely.</p> <p>19 Q. So you've said that you weren't aware of any of 20 the specific incidents of mistreatment seen on Panorama. 21 Were you personally aware of any similar types of 22 mistreatment to that shown on Panorama?</p> <p>23 A. It's difficult for me, at this point, to recollect, and 24 without, you know, without being at GDWG currently to 25 refresh my memory in terms of access to the database and</p> <p style="text-align: center;">Page 66</p>	<p>1 directly. Obviously, particularly the physical incident 2 where a person is being restrained on the ground where 3 there are racist remarks being issued. It was, yes, 4 shocking. It was shocking.</p> <p>5 Q. Did you reflect at the time about how you had missed or 6 how you didn't know of this sort of stuff happening?</p> <p>7 A. Yes, to a point. I mean, I'm a reflective and 8 self-critical person. I think GDWG was also a very 9 reflective organisation. I don't think you can work, 10 you know, as a charity providing this sort of service -- 11 if you are a person who has gone in to do that as your 12 work or an organisation trying to do that, you can't 13 help but want to do more because the needs in this area 14 of work are so immense. You can't help but reflect on 15 that.</p> <p>16 I think, being very fair to myself, and to ourselves 17 as an organisation, I think the reasons why we had very 18 limited awareness of the issues were quite -- there's 19 quite clear reasons in terms of our level of access to 20 the centre, particularly how limited we were in terms of 21 not even having a presence in the welfare space, where, 22 again, that's not being on the wings, but, you know, we 23 were so far back, we were -- our contact with the client 24 was kept to -- clients was kept at a certain distance. 25 There were lots of reasons why clients might not have</p> <p style="text-align: center;">Page 68</p>

17 (Pages 65 to 68)

<p>1 felt able or wanted us to escalate certain things.</p> <p>2 I don't know how much more we could have done with those</p> <p>3 restrictions in place.</p> <p>4 Q. I was going to ask, with those restrictions in place,</p> <p>5 looking back, do you think there is anything that you,</p> <p>6 as an organisation, or as a person, could have done to</p> <p>7 increase the likelihood that you would be aware of</p> <p>8 the type of things shown?</p> <p>9 A. I'm not aware of any, as you say, with that caveat, with</p> <p>10 those restrictions in place. I think I would feel</p> <p>11 confident that if I had -- if I was to look back and</p> <p>12 review cases from the time where there were issues</p> <p>13 raised, whether we raised them or how we raised them was</p> <p>14 thought about very carefully and careful decisions made.</p> <p>15 So I don't think that there was more we could do.</p> <p>16 Q. On a sort of similar issue, but not specifically in</p> <p>17 relation to what was shown on Panorama, you say at</p> <p>18 paragraph 16 of your inquiry statement, which is at</p> <p>19 page 5 of that document, that you wouldn't have reported</p> <p>20 a safeguarding concern in relation to each and every use</p> <p>21 of force that was applied during the relevant period.</p> <p>22 I think you say that because you thought there was</p> <p>23 already channels where those were being recorded and</p> <p>24 reviewed; is that right?</p> <p>25 A. Yes.</p> <p style="text-align: right;">Page 69</p>	<p>1 as a sort of safeguarding concern, and you talked about</p> <p>2 immediacy being a key factor for you, at least, that you</p> <p>3 applied. Taking the situation where a detained person</p> <p>4 tells you something but says, "I don't want to make</p> <p>5 a complaint", would you have reported, for example, if</p> <p>6 there was physical violence outside of a use of force?</p> <p>7 A. It's very hard to comment generally without a specific</p> <p>8 example, I think, in mind.</p> <p>9 Q. I will ask you again, but maybe it's the same answer,</p> <p>10 but if a client, a detained person, told you that they'd</p> <p>11 been subjected to racial abuse but said they didn't want</p> <p>12 to report it, is that something you would feel that you</p> <p>13 had to report as a safeguarding concern, or as any</p> <p>14 concern?</p> <p>15 A. Again, I'm sorry, I think it's difficult without</p> <p>16 specific examples in mind. I think we wouldn't</p> <p>17 necessarily have reported that, particularly if the</p> <p>18 client was telling us not to.</p> <p>19 Q. Is it fair to say that, in these situations, really, you</p> <p>20 took a fact-specific approach, rather than a sort of --</p> <p>21 any sort of categorical one where this category of</p> <p>22 reports always goes forward?</p> <p>23 A. Yes. Beyond that threshold, as I mentioned, of an</p> <p>24 immediate risk, particularly through suicide or</p> <p>25 self-harm, yes. That's correct.</p> <p style="text-align: right;">Page 71</p>
<p>1 Q. Is it right that you were the safeguarding lead for GDWG</p> <p>2 at the time?</p> <p>3 A. Yes, that's correct.</p> <p>4 Q. I'm asked on behalf of G4S to ask you whether you would</p> <p>5 have reported any use of force if you were concerned or</p> <p>6 told that it was disproportionate or unnecessary?</p> <p>7 A. I'm as confident as I can be that we would have raised</p> <p>8 use of force at a certain -- I think what was often the</p> <p>9 case was that the client might refer to us -- to a use</p> <p>10 of force in quite general terms, but not want us to</p> <p>11 raise anything or tell us explicitly they thought things</p> <p>12 would be made worse for them if it was raised. That</p> <p>13 might have happened.</p> <p>14 I think -- there's lots -- a context to a lot of</p> <p>15 the concerns we might have about clients is often -- you</p> <p>16 know, in a number of cases, it might be the welfare</p> <p>17 officers that are referring us to the client in the</p> <p>18 first place. So they would tell us -- so, for</p> <p>19 example -- yeah, they might give us context about what</p> <p>20 had happened to a client or what the client alleged had</p> <p>21 happened, so it was already made clear to us at the</p> <p>22 outset that the centre were aware, or should be aware,</p> <p>23 of the particular thing.</p> <p>24 Q. We talked a little bit before about the sort of</p> <p>25 threshold that might apply for you referring something</p> <p style="text-align: right;">Page 70</p>	<p>1 Q. You set out in your inquiry statement at paragraph 19</p> <p>2 a number of possible reasons why GDWG were unaware of</p> <p>3 the mistreatment that was shown on Panorama. I've</p> <p>4 already -- we can see those in your statement and we</p> <p>5 have already dealt with that with Ms Pincus. But just</p> <p>6 on one of the things, one thing you say is that detained</p> <p>7 people sometimes lacked faith, even in third parties'</p> <p>8 independence, like NGOs, and you also talk about how, in</p> <p>9 your experience, detainees were fearful of raising</p> <p>10 concerns or complaints and that that can lead to</p> <p>11 punitive measures or damage in some way for their</p> <p>12 immigration cases, applications for bail or other</p> <p>13 claims.</p> <p>14 Were you ever told by a detained person that they</p> <p>15 lacked faith or trust in your own independence as an</p> <p>16 organisation?</p> <p>17 A. I don't recall instances of that happening. I certainly</p> <p>18 recall examples of clients being frustrated with our</p> <p>19 limitations as an organisation, so, for example, not</p> <p>20 being able to give legal advice or make bail</p> <p>21 applications or other limitations we were hitting.</p> <p>22 I don't remember our independence, so to speak, being</p> <p>23 directly questioned by clients.</p> <p>24 If I might just add, what I think was definitely the</p> <p>25 case was a more general, pervasive sense of distrust.</p> <p style="text-align: right;">Page 72</p>

<p>1 I think it's -- you know, clients put in indefinite 2 detention in prison conditions and increasingly, at this 3 point, in crowded rooms in desperate situations, I think 4 it's reasonably understandable that clients would be -- 5 people detained would find it difficult to know who to 6 trust, find it difficult to know how to distinguish 7 between who is, you know, a G4S representative versus 8 who is an NGO, where do those sit. I think 9 a generalised sense of, "Nobody is helping me" was 10 understandable and probably common.</p> <p>11 Q. You also state that a large number of people were not 12 aware of GDWG and did not realise that they could raise 13 welfare or other concerns with GDWG or receive help with 14 making complaints. What, if any, steps did you take to 15 try and tackle those issues as an organisation?</p> <p>16 A. In terms of knowledge of our --</p> <p>17 Q. Yes, increasing awareness or increasing awareness about 18 what they could report to you or talk to you about as an 19 organisation?</p> <p>20 A. Well, I think the main things, we would certainly have 21 tried, where possible -- it was -- again, our limited 22 physical access into the centre was a barrier. So, for 23 example, we tried to ensure there were posters with, you 24 know, contact information and basic information about 25 our services available, and I think in different</p> <p style="text-align: center;">Page 73</p>	<p>1 purpose of the drop-in sessions and the reasons why they 2 needed to take place in a private room. Why did you 3 feel that they needed to be set out in this way at this 4 time?</p> <p>5 A. I wanted to -- my purpose of this letter was to try and 6 be as diplomatic as possible but also as clear as 7 possible. I wanted to both reassure them, so I wanted 8 to -- you know, I stressed again to management that we 9 weren't providing legal advice, that we weren't 10 providing counselling, that we were clear and that 11 everyone volunteering or working for us was clear on 12 those boundaries, "Here are the, we think, completely 13 reasonable things to do". I think even in the context 14 of that time and the aftermath of that August meeting -- 15 well, I wasn't prepared to agree to what they thought 16 that -- what they really wanted was me to say, "We will 17 meet clients in a private room to assign a social 18 visitor, check that this came up in meetings at points 19 to check -- because we also gave out second-hand 20 clothing on request, to check measurements for clothing. 21 "These are the things we will do, and absolutely no more 22 than that". I wasn't going to commit to that because 23 that wasn't where we saw the remit of our work stopping.</p> <p>24 Q. Did you feel like you could be more assertive, as at 25 25 September 2017, because Panorama had been shown and</p> <p style="text-align: center;">Page 75</p>
<p>1 languages within the centre. But because we weren't 2 actually going in ourselves, even to put things on 3 a notice board, we were reliant on staff putting those 4 up, checking they were up, updating them. I don't know 5 how often that was happening. Otherwise, we were 6 dependent very much on the welfare officers referring to 7 us frequently and spreading the word about us, which 8 I think they generally very much did, and on strong word 9 of mouth around clients and on keeping our access going, 10 I mean, keeping -- we were responsive on our free 11 helpline, keeping our drop-ins running, even when we 12 were, you know, a very small-staffed team, but keeping 13 those running as much as possible so we were there as 14 much as possible so that we were known as much as 15 possible.</p> <p>16 Q. I want to come on to talk about some stuff after 17 Panorama and how the relationship was in the immediate 18 aftermath.</p> <p>19 We can see, if we can bring up on screen <GDW000003> 20 at page 41, this is a letter that you sent on 21 25 September 2017, so about three weeks after Panorama 22 was broadcast, to Steve Skitt, but copying in 23 Paul Gasson. The letter carries on from 41 to 44, and 24 without going through each bit of it, in summary, you 25 set out in this letter in detail the work of GDWG, the</p> <p style="text-align: center;">Page 74</p>	<p>1 you already said there was a sort of slight change in 2 the balance of power?</p> <p>3 A. I'm sure that was in my mind. Although, you know, 4 I think this letter is quite detailed and I wanted to 5 respond as constructively as possible, but I think that 6 dynamic was in my mind, yes.</p> <p>7 Q. If we go over to page 43, which is still part of that 8 letter, you also set out here -- you address some of 9 the concerns that had been raised at the most recent 10 meeting in August, which you have already talked about. 11 In relation to referring people to IMB and RAPT, you 12 emphasise in your letter that, in your view, the nature 13 of your contact with those agencies was a matter for you 14 and those organisations. Is that right?</p> <p>15 A. Yes.</p> <p>16 Q. You also respond to the concerns raised about the tone 17 of emails, saying that your view was that you didn't 18 think the tone was disrespectful, but noting that tone 19 can be subjective. Is that right?</p> <p>20 A. Yes, that's correct.</p> <p>21 Q. You say that you're happy to continue the arrangement 22 you offered immediately after the meeting and it says 23 "where I will be the individual conduit for any concerns 24 raised to you by GDWG for the time being". Was that 25 what happened in the period from this time?</p> <p style="text-align: center;">Page 76</p>

<p>1 A. Yes, as far as I can recall. I don't think I had 2 a response to this letter, and I think there was then 3 a period following on from this where there were far 4 fewer requests for meetings from management. But 5 I think, as far as I'm aware, we continued with that 6 arrangement. 7 Q. You go on, from the bottom here, to make suggestions 8 about the future conduct of the meetings, saying you'd 9 like to bring a trustee to meetings. You say in your 10 statement that was so that somebody could take a note; 11 is that right? 12 A. Yes. Yes, that's correct. I mean, I also -- yeah, 13 I mean, I also felt that, having had that experience of 14 that August meeting, I wanted a back-up, another witness 15 in the room, apart from anything else, but also 16 additional support for me, given that dynamic. 17 Q. Because in meetings it was you and at least two other 18 people -- 19 A. Three managers, yes. 20 Q. As you say -- you also say in here, and these are the 21 proposals we talked about before, that you would like, 22 for future meetings, there to be an agenda agreed 23 beforehand and, if they had concerns, you'd like them to 24 them out in summary before the meeting. Did you ever 25 receive a response to this?</p> <p style="text-align: center;">Page 77</p>	<p>1 what it was made clear to me was that, in the 2 0.01 per cent of issues, they were very, very agitated 3 about that. 4 Q. At paragraph 57 of your 2018 statement, you say that it 5 must have been around a week after this you refer to the 6 fact that your colleague, Ms Blackwell, emailed the 7 Forward Trust, Anton Bole, who was a witness on 8 Wednesday, to check that GDWG could continue to refer 9 detainees directly to the Forward Trust, and that they 10 could refer people directly to you for help in return. 11 If we can turn up page 46 of this document, you will see 12 the email there: 13 "Can you confirm we both continue to agree that we 14 can refer cases directly to you and vice versa?" 15 And then if we go up, in response: 16 "Dear Naomi, I hope you are well. I was informed 17 that referral process has to go through Welfare Office 18 please." 19 If we can go to page 45, the previous page. 20 Naomi Blackwell responds saying: 21 "Can you tell me when you were informed this and by 22 whom? If you get a chance, can we discuss this?" 23 The response from Anton Bole is: 24 "I am not allowed to give any information regarding 25 your questions. It would be best to contact Deputy</p> <p style="text-align: center;">Page 79</p>
<p>1 A. I don't believe I did, no. 2 Q. At the bottom of page 44, if we can -- sorry, the top of 3 that page. You say in the final paragraph: 4 "Finally, to end on a positive note, I was really 5 encouraged to hear you say at the meeting that you felt 6 that in 99.9 per cent of cases that GDWG was doing good 7 work." 8 How do you reconcile the -- I'm asked to ask you 9 this on behalf of the Home Office or G4S, I can't 10 remember exactly which one -- how do you reconcile this 11 comment that had been made, that in 99.9 per cent of 12 cases you were doing good work, with the suggestion at 13 that meeting that they were being bullying and combative 14 and distrustful? 15 A. I don't recall the exact wording in the meeting, so I -- 16 but I'm confident it happened because I referred to it. 17 My recollection of that meeting is that it was strongly 18 hostile and, as I described, repeated threats to take 19 the drop-in away, raised voices. I think somebody may 20 have banged the table at some point. It was a very 21 agitated meeting. So I think -- I'm confident in saying 22 that this comment would have been an effective aside. 23 It would have been a specific reference to visiting, 24 which they didn't have an issue with. So it was a, 25 "This is what you are doing. You are doing well", but</p> <p style="text-align: center;">Page 78</p>	<p>1 Director Stephen Skitt who can give you more informed 2 information." 3 And Stephen Skitt is cc'd in there. Do you now know 4 or have any view as to who made this decision? 5 A. I don't. Well, no, I don't know for certain. I mean, 6 this chimes very much with the message I was given and 7 the fact that the referrals to the RAPT organisation, 8 the Forward Trust, was one of the things they wanted to 9 discuss at that August meeting and were clear they 10 didn't think was appropriate. 11 Q. So although you'd said previously that you felt there 12 was some shift in the balance of power after Panorama, 13 this was three or four weeks on from Panorama, and 14 you're being told that you can't refer people to the 15 drugs and alcohol charity and they can't refer them to 16 you directly. Is that right? 17 A. Yes. If I might add, and the context was that, prior to 18 this, although I think -- I think, for a variety of 19 reasons, we may not have referred large numbers of 20 clients to RAPT, but Anton had been into our office 21 earlier that year, I think to train staff and talk about 22 his work. He was very welcoming and friendly, 23 encouraging referrals. He was a very open, 24 straightforward person offering that support, and we 25 found him very easy to speak with and refer to. So it</p> <p style="text-align: center;">Page 80</p>

20 (Pages 77 to 80)

<p>1 seemed clear this wasn't -- I would be very surprised to</p> <p>2 learn it doesn't fit with the August meeting that all of</p> <p>3 this was led by -- that this was driven by RAPT deciding</p> <p>4 that things were inappropriate. It seemed clear that</p> <p>5 that was management influencing and saying this wasn't</p> <p>6 appropriate.</p> <p>7 Q. In fact, Anton Bole gave evidence on Wednesday saying</p> <p>8 that they were told not to contact GDWG but not given an</p> <p>9 explanation as to why. Does that surprise you or does</p> <p>10 that accord with what you thought at the time?</p> <p>11 A. No, that accords with what I thought.</p> <p>12 Q. So we have seen your letter, which was in</p> <p>13 September 2017, two or three weeks after Panorama, and</p> <p>14 you say in your inquiry statement, at paragraph 10, that</p> <p>15 Brook House management did not arrange a further meeting</p> <p>16 with you until September 2018, a full year after</p> <p>17 Panorama. Is that right?</p> <p>18 A. Yes.</p> <p>19 Q. Had you made any requests for meetings?</p> <p>20 A. I don't recall -- I don't recall doing so. I think</p> <p>21 my -- the assessment that I made was that we were --</p> <p>22 strategically, the context of Panorama meant that the</p> <p>23 power dynamic was different. I would have welcomed what</p> <p>24 I'd set out, you know, previously, but also in</p> <p>25 that September 2017 letter, in terms of quarterly</p> <p style="text-align: center;">Page 81</p>	<p>1 A. Yes.</p> <p>2 Q. I think in your 2018 statement, you said, and without</p> <p>3 going to the specific paragraph, I think it's fair to</p> <p>4 summarise that you were slightly concerned when you were</p> <p>5 giving that statement that there might be negative</p> <p>6 consequences for you?</p> <p>7 A. Yes.</p> <p>8 Q. Is that fair?</p> <p>9 A. Yes.</p> <p>10 Q. But I think it's right you say in your inquiry witness</p> <p>11 statement that, in fact, there weren't any negative</p> <p>12 consequences for you, after giving that statement?</p> <p>13 A. No, that's correct.</p> <p>14 Q. But you do -- sorry, carry on?</p> <p>15 A. I was just going to mention that we also actually had</p> <p>16 a positive development at Tinsley House rather than</p> <p>17 Brook, in that, in the early part of 2018, where we had</p> <p>18 long wanted to set up an equivalent drop-in surgery</p> <p>19 space within Tinsley House, and that was able to happen</p> <p>20 quite positively.</p> <p>21 Q. Was it the same -- I think we have heard evidence</p> <p>22 there's the same management, G4S management, that were</p> <p>23 running Brook House and Tinsley House at the relevant</p> <p>24 period, and I think some Home Office staff as well. Was</p> <p>25 it the same people you were dealing with?</p> <p style="text-align: center;">Page 83</p>
<p>1 meetings but an agreed format. I would have welcomed</p> <p>2 that. They never responded on that. Since the dynamic</p> <p>3 leading up to then, over a period of time, and I think</p> <p>4 it had been the time -- it had been the case in the time</p> <p>5 of my predecessor too, was of management effectively --</p> <p>6 and it felt like this to me and I think my predecessor</p> <p>7 alluded to this too, that it was us being sort of called</p> <p>8 in to be told off, for want of a better way of putting</p> <p>9 it, about a particular incident. I wasn't, therefore,</p> <p>10 chasing particular meetings, apart from that point,</p> <p>11 unless they wanted to agree to a new format.</p> <p>12 Q. Was there any change, for example, in the willingness of</p> <p>13 Brook House management to agree to repeat visits after</p> <p>14 Panorama?</p> <p>15 A. My recollection is that -- a subtle one. My</p> <p>16 recollection is that there were at least some occasions</p> <p>17 in the year or so after the relevant period that there</p> <p>18 would be occasions where we would request -- a staff</p> <p>19 member would request a second visit and not get</p> <p>20 a response and we would make a judgment call that -- and</p> <p>21 probably chase it and still get no response. So we</p> <p>22 would make a judgment call that we would, in effect,</p> <p>23 risk their wrath because we would put the person in</p> <p>24 anyway and it wouldn't be an issue. I don't remember --</p> <p>25 Q. You were more willing to risk the wrath from then; yes?</p> <p style="text-align: center;">Page 82</p>	<p>1 A. From recollection, Naomi Blackwell and I met with</p> <p>2 a manager at Tinsley who had certainly worked across</p> <p>3 both sites and referred back to, relatively, in passing,</p> <p>4 the witness statement alleged issue.</p> <p>5 Q. You say in your inquiry statement that, despite these</p> <p>6 sort of improvements, you remained cautious about what</p> <p>7 issues you raised, even after Panorama, and you give the</p> <p>8 example of a detained person being put on closed visits</p> <p>9 as an apparently punitive measure -- that's at</p> <p>10 paragraph 12 of your inquiry statement. We heard</p> <p>11 evidence from Jamie MacPherson on Wednesday that he, in</p> <p>12 fact, raised an occasion with you when he thought</p> <p>13 a detained person, D191, had been put on closed visits</p> <p>14 as a punitive measure, and you had said that you didn't</p> <p>15 feel that you could raise that with G4S without</p> <p>16 destabilising the relationship. Is that the occasion</p> <p>17 that you are talking about or was there more than one?</p> <p>18 A. Oh, in terms of us going ahead with a second --</p> <p>19 Q. So you were saying -- you say in your statement that</p> <p>20 there's an example of detained people being put on</p> <p>21 closed visits as an apparently punitive measure.</p> <p>22 Jamie MacPherson gave evidence about one of those. Was</p> <p>23 there only one situation like that or were there more</p> <p>24 situations like that?</p> <p>25 A. My apologies, I'm clear now. From my recollection, that</p> <p style="text-align: center;">Page 84</p>

<p>1 wasn't the only example of that. There weren't</p> <p>2 numerous -- many examples, but I think, in a similar</p> <p>3 period, there may have been one or two other examples of</p> <p>4 different visitors experiencing that issue.</p> <p>5 Q. I'm asked on behalf of G4S to ask you how you knew that</p> <p>6 this was happening as a punitive measure, as opposed to</p> <p>7 for any other reason?</p> <p>8 A. I think I was certainly clear on -- it was certainly</p> <p>9 clear from the time. I mean, I remember -- we certainly</p> <p>10 were clear on that from our understanding of what the</p> <p>11 person detained was being told and the fact that the</p> <p>12 closed visits seemed to be happening on a kind of --</p> <p>13 effectively on an indefinite basis, and our</p> <p>14 understanding was that shouldn't be the case. I think</p> <p>15 the conclusion that Jamie reached was that the -- in</p> <p>16 relation to this particular client was that the visits</p> <p>17 had been stopped because the client was allegedly</p> <p>18 receiving drugs, no-one else was visiting him apart from</p> <p>19 Jamie, there was an implied accusation to the GDWG</p> <p>20 visitor.</p> <p>21 Q. Is it fair to say, essentially, you believed what your</p> <p>22 visitors were telling you?</p> <p>23 A. Yes. Yes. I'm sorry to be vague. I think, if I could</p> <p>24 review the client information, I'd be clear on that.</p> <p>25 But I remember being very clear, it seemed, we were</p> <p style="text-align: center;">Page 85</p>	<p>1 "G4S don't like them referring cases to others.</p> <p>2 "Meets Steve Skitt, Dan Haughton, Paul Gasson ...</p> <p>3 "G4S feel openly threatened.</p> <p>4 "Don't want them [or you] contacting IMB, HO</p> <p>5 caseworker."</p> <p>6 "Struck by level of hostility."</p> <p>7 I presume that's from you:</p> <p>8 "Included Ben Saunders."</p> <p>9 Is that saying that the hostility included hostility</p> <p>10 from Ben Saunders?</p> <p>11 A. Yes, although certainly it felt that was also -- I think</p> <p>12 I only met with Ben Saunders on that one occasion</p> <p>13 relatively early in post, but he echoed very much the</p> <p>14 concerns I'd heard before and since.</p> <p>15 Q. "JW has never been in centre. Thinks G4S refused."</p> <p>16 Had you requested to go into the heart of the centre</p> <p>17 before?</p> <p>18 A. We'd requested a tour of the centre so we had a better</p> <p>19 understanding of the layout, which I knew was something</p> <p>20 that wasn't unprecedented in terms of other NGOs and,</p> <p>21 actually, I had at other centres outside of Gatwick.</p> <p>22 Q. Do you remember when that request was made and refused?</p> <p>23 A. I don't recall. I think I would have requested that</p> <p>24 fairly early on in post in 2016, but I don't recall.</p> <p>25 Q. Was there a reason ever given to you for refusing that</p> <p style="text-align: center;">Page 87</p>
<p>1 clear, we were looking back -- we were looking at the</p> <p>2 wording of the Detention Service Orders and checking on</p> <p>3 this point and it seemed clear to us it was being</p> <p>4 applied as a punitive measure, that there weren't other</p> <p>5 legitimate reasons for the closed visits being imposed.</p> <p>6 Q. I want to come on to discuss your interviews with Verita</p> <p>7 which happened after 2017/2018. You were interviewed</p> <p>8 firstly by -- you met firstly with Ed Marsden from</p> <p>9 Verita, I understand, on 24 October 2017. If we can</p> <p>10 bring that document up on screen, <VER000198>, please.</p> <p>11 So these are the notes from the meeting. Have you had</p> <p>12 the chance to look at these before?</p> <p>13 A. Yes.</p> <p>14 Q. We can see from the bottom -- it sets out the big</p> <p>15 issues, some notes on what your activities were at</p> <p>16 Brook House. At the bottom, it summarises your</p> <p>17 relationship with G4S. It says:</p> <p>18 "[Difficult] relationship with G4S."</p> <p>19 On the next page at the top:</p> <p>20 "... meets them quarterly.</p> <p>21 "G4S are defensive and suspicious -- want to</p> <p>22 restrict their role.</p> <p>23 "Happy with them doing non-controversial practical</p> <p>24 tasks.</p> <p>25 "Suspicious of casework.</p> <p style="text-align: center;">Page 86</p>	<p>1 request?</p> <p>2 A. I don't remember being given one, no.</p> <p>3 Q. We see at the bottom under "Incidents", starting from</p> <p>4 the third bullet point, a question:</p> <p>5 "Where does BBC programme fit in JW's experience?"</p> <p>6 Presumably a note of your response:</p> <p>7 "Can't place it. Shocked him. But had heard</p> <p>8 rumours. Can't compare it over time."</p> <p>9 What does "Can't place it" mean? I know these are</p> <p>10 only notes, but if you can help.</p> <p>11 A. "Can't place it". I think the context of the question</p> <p>12 was, how did this stand out as an unusual -- how did</p> <p>13 this relate to what happened -- experience of detention</p> <p>14 before that. I think that that phrase, "Can't compare</p> <p>15 it over time" is probably accurate because we only had</p> <p>16 the undercover footage at that particular point.</p> <p>17 Q. It says:</p> <p>18 "GDWG have good relations with some officers. Know</p> <p>19 that they are caring."</p> <p>20 "No notice removal adds to anxiety."</p> <p>21 Presumably of detained people:</p> <p>22 "Paul Gasson -- hostile.</p> <p>23 "Steve Skitt -- was helpful and now less so. Become</p> <p>24 more hostile. Don't refer to other agencies etc."</p> <p>25 Then it talks about a defensive response.</p> <p style="text-align: center;">Page 88</p>

<p>1 Then we know, Mr Wilson, that you gave an interview 2 to Kate Lampard's investigation in February 2018 that 3 covers much of the issues we have already discussed, so 4 I don't need to ask you about specific bits, but, chair, 5 I ask for that to be adduced in full and that is at 6 <VER000249>.</p> <p>7 Mr Wilson, I want to come on to ask you about your 8 relationship with the IMB. In your 2018 witness 9 statement, you speak about your dealings with the IMB, 10 the Independent Monitoring Board, at paragraphs 61 to 11 64. You refer to three meetings you had with IMB 12 members since becoming a director. You talk about one 13 when you first started in summer 2016, where you say 14 that you gained the impression that the IMB was too 15 close to Brook House management and that they had 16 advised you -- they were keen to advise you not to 17 overstep the mark with Brook House management. Is that 18 right?</p> <p>19 A. Yes, that's correct.</p> <p>20 Q. We have an email exchange between Ms Blackwell and 21 Jackie Colbran from the IMB which we have already seen 22 when looking at G4S's response to this. If we can bring 23 up on screen again <GDW000003>, page 38. Dealing now 24 with the IMB's response, with Jackie Colbran's response, 25 this was where Ms Blackwell wanted them to intervene to</p> <p style="text-align: center;">Page 89</p>	<p>1 being followed correctly" without saying, "We will look 2 into this", which I would expect an Independent 3 Monitoring Board to do.</p> <p>4 Q. The bottom couple of lines say:</p> <p>5 "If you have concerns about a detainee we should 6 always be more than glad to hear from you and where 7 appropriate pass the information to the Brook House 8 safeguarding manager, whose specific role is to protect 9 the vulnerable."</p> <p>10 Did you believe that during the relevant period -- 11 first of all, do you know who the safeguarding manager 12 was during the relevant period?</p> <p>13 A. We had a safeguarding -- the safeguarding contact email 14 and phone number to call. There was a member of staff 15 called James Begg who would often be the person 16 responding. I'm not sure -- I don't think his job title 17 was the safeguarding manager, so I'm not certain on that 18 point.</p> <p>19 Q. Do you feel like Brook House -- whether it is safer 20 custody or whatever it was called at the relevant 21 period, do you think that they did undertake a specific 22 role to protect the vulnerable?</p> <p>23 A. I think that should have been part of that role. 24 I think -- you know, it was clear to us -- we would 25 never -- we had nothing to be gained by raising things</p> <p style="text-align: center;">Page 91</p>
<p>1 check whether his request to move to Tinsley House would 2 be dealt with. She says:</p> <p>3 "This is beginning to step outside our remit ..."</p> <p>4 And that it would be inappropriate for them to 5 follow it up. There was no indication that correct 6 procedures were not being followed. Did you think this 7 was a reasonable response by the IMB?</p> <p>8 A. No. I think -- our understanding of the IMB's role was 9 that they were, you know, encouraging concerns to be 10 raised, particularly directly from people detained. 11 There was the actual complaints box system for that to 12 happen. Our impression was it was not used very much 13 but that was there, they had a regular presence in the 14 centres. So I -- I felt it was entirely appropriate 15 that we -- that Naomi had raised this with them. 16 I don't -- I think it would also have been -- it would 17 have been appropriate for them to not be able to give us 18 very much information back, but to say, "We will take 19 this away. Thank you for raising that". But I felt 20 this was, yes, very unnecessary.</p> <p>21 The phrase "There's no indication that the correct 22 procedures have not been followed", I think there was 23 quite a quick turnaround between emails here. It seemed 24 to me at the time, and seems now, looking back, to have 25 been a very quick, "We are confident that everything is</p> <p style="text-align: center;">Page 90</p>	<p>1 unless we felt they needed to be raised. So if we were 2 raising something to the IMB, it was because things 3 weren't -- support wasn't in place, for whatever reason, 4 within the centre and we were asking an independent 5 organisation to do it if there was anything they could 6 do to look into that.</p> <p>7 Q. Did you ever attend a safer custody meeting?</p> <p>8 A. No.</p> <p>9 Q. Were you ever invited to do so?</p> <p>10 A. No, I don't believe I was ever invited. I'm sure 11 I would have attended.</p> <p>12 Q. I'm asked to ask you a rule 10 from the IMB. Other than 13 this occasion, do you remember whether there were other 14 occasions during the relevant period when your 15 organisation sent emails to the IMB raising concerns 16 about specific detained people?</p> <p>17 A. I'm not certain. I think certainly not frequently. 18 I think we would occasionally, but I don't recall, I'm 19 afraid.</p> <p>20 Q. What about emails raising concerns about more general 21 matters, such as facilities on the wings and things like 22 that? Do you remember whether those types of issues 23 were raised with the IMB?</p> <p>24 A. I don't remember us doing that outside of where -- the 25 small number of meetings you mentioned during my time at</p> <p style="text-align: center;">Page 92</p>

<p>1 the organisation. I don't remember that kind of</p> <p>2 correspondence.</p> <p>3 Q. Did the IMB take up any referrals that you gave them</p> <p>4 during the relevant period, to the best of your</p> <p>5 recollection?</p> <p>6 A. I don't remember them doing so, no.</p> <p>7 Q. Were there occasions when the IMB would refer people to</p> <p>8 you as an organisation?</p> <p>9 A. I don't remember that happening, no. I'm not certain it</p> <p>10 didn't, but I don't remember that happening.</p> <p>11 Q. If we can bring up on screen, please, <VER000110>.</p> <p>12 Chair, that's at tab 7 of your bundle.</p> <p>13 A. Thank you.</p> <p>14 Q. These are notes of a meeting that you had with IMB</p> <p>15 members in November 2017. So this was two months after</p> <p>16 Panorama had been broadcast.</p> <p>17 You say in your statement, at paragraph 62, that</p> <p>18 they, the IMB, had clearly been in discussion with</p> <p>19 Brook House management about management's criticisms of</p> <p>20 your organisation, as they repeated a list of G4S</p> <p>21 complaints. Is that right?</p> <p>22 A. Yes.</p> <p>23 Q. We can see from the top there:</p> <p>24 "BH management suspicious that we give legal advice</p> <p>25 that we are not qualified to do, eg referral of</p> <p style="text-align: center;">Page 93</p>	<p>1 A. I'd had very little experience of going into prisons and</p> <p>2 working with prison officers, so we wouldn't be able to</p> <p>3 make that comparison ourselves. I mean -- I think maybe</p> <p>4 you were going to ask -- I mean, I felt very much they</p> <p>5 were passing on without having critically kind of</p> <p>6 processed the comments from management about what they</p> <p>7 thought our approach was. I felt this was quite</p> <p>8 defensive and did seem further evidence of a closeness</p> <p>9 which I had picked up at that first meeting I had with</p> <p>10 them in 2016.</p> <p>11 Q. Just so we know, did you know the provenance of this</p> <p>12 meeting note? Was this a note that was done by someone</p> <p>13 within GDWG?</p> <p>14 A. Yes, a member of the team.</p> <p>15 Q. The penultimate dash there says:</p> <p>16 "Our contract with HO at Brook House: Paul [Gasson]</p> <p>17 closed and hostile."</p> <p>18 Is that referring -- is that you saying that</p> <p>19 Paul Gasson was closed and hostile or is that IMB saying</p> <p>20 that? Do you remember?</p> <p>21 A. I honestly can't remember at this point. It's hard to</p> <p>22 imagine it was IMB saying that.</p> <p>23 Q. Going further down the page, please, if we could bring</p> <p>24 up the bottom half, just picking out another couple of</p> <p>25 things there about how the IMB operates, it says they</p> <p style="text-align: center;">Page 95</p>
<p>1 detainees to other agencies; these should be referred to</p> <p>2 BH management; described as 'insulting' and</p> <p>3 'patronising'."</p> <p>4 Is that what the IMB told you?</p> <p>5 A. Yes.</p> <p>6 Q. Just so that we can be as clear as possible, when we are</p> <p>7 talking about the IMB here, who were the individuals</p> <p>8 that you met; do you remember?</p> <p>9 A. At this particular meeting?</p> <p>10 Q. Yes. I think we know, if it helps, that Jackie Colbran</p> <p>11 was the chair of the IMB up until January 2018?</p> <p>12 A. She was handing over to Mary.</p> <p>13 Q. To Mary Molyneux?</p> <p>14 A. I think they were both present there. I think there was</p> <p>15 at least one or two other members of the IMB there.</p> <p>16 I can't recollect the names.</p> <p>17 Q. Still looking at that, a few lines down, it was noted:</p> <p>18 "IMB: G4S staff are more humane and have better</p> <p>19 social skills than prison officers; co-operation and</p> <p>20 openness."</p> <p>21 So was that the IMB saying that, actually, G4S staff</p> <p>22 are more humane and have better skills than prison</p> <p>23 officers?</p> <p>24 A. Yes.</p> <p>25 Q. What was your reaction to that?</p> <p style="text-align: center;">Page 94</p>	<p>1 are a "Monitoring role, not there to help the detainees</p> <p>2 on an individual basis". Did they tell you that it</p> <p>3 wasn't their role to help detainees on an individual</p> <p>4 basis?</p> <p>5 A. Yes. I mean -- yes. Yes.</p> <p>6 Q. The third dash says:</p> <p>7 "Detainees treated fairly and humanely."</p> <p>8 Was that them saying that detainees were treated</p> <p>9 fairly and humanely --</p> <p>10 A. I think they were saying their job was to ensure that</p> <p>11 happened.</p> <p>12 Q. The penultimate bullet point says:</p> <p>13 "Complaint re staff member, they do a full-scale</p> <p>14 investigation if it's serious."</p> <p>15 Was that the IMB saying that if there was</p> <p>16 a complaint about a staff member, they would do</p> <p>17 a full-scale investigation if it was serious?</p> <p>18 A. Or that it would happen. I don't know whether IMB would</p> <p>19 do that. They were referring to G4S doing that.</p> <p>20 Q. Okay. The bullet point above that, while I see it, is:</p> <p>21 "Three officers and a manager on each wing; now</p> <p>22 150 detainees per wing with just two officers."</p> <p>23 Was that an issue about staffing levels?</p> <p>24 A. Yes.</p> <p>25 Q. If we can go over to the next page, please, the third</p> <p style="text-align: center;">Page 96</p>

<p>1 bullet point from the bottom says:</p> <p>2 "IMB 'did not know' about Panorama issues raised(!).</p> <p>3 They felt that Panorama gave a distorted picture: in</p> <p>4 their (IMB's) [presuming 'mind'] there were undoubtedly</p> <p>5 'a couple' of serious incidents captured (including the</p> <p>6 strangulation) but much of the programme was dramatic</p> <p>7 music, blurry images giving an impression of chaos and</p> <p>8 'fluff'."</p> <p>9 Was that the message that came to you from the IMB?</p> <p>10 A. Very clearly, yes.</p> <p>11 Q. Do you remember who said that?</p> <p>12 A. I think it was Jackie leading the conversation and</p> <p>13 saying that, but I'm not 100 per cent sure at this</p> <p>14 point.</p> <p>15 Q. How did you react to that during the meeting?</p> <p>16 A. I was very surprised, and I remember, as a staff team,</p> <p>17 we discussed afterwards we were all taken aback by that.</p> <p>18 We were -- we had an impression of IMB having -- of</p> <p>19 being very close to management. We were concerned about</p> <p>20 how they were doing their role. We'd had that -- the</p> <p>21 issues around being told not -- you know, around the</p> <p>22 contact that had happened earlier in the year. We were</p> <p>23 expecting at this point -- so this is November 2017,</p> <p>24 a couple of months after Panorama, we were expecting --</p> <p>25 and, I have to say, IMB were always -- you know, in the</p> <p style="text-align: center;">Page 97</p>	<p>1 much direct contact with the IMB. I remember I think it</p> <p>2 was at this point that we had agreed a system where the</p> <p>3 IMB were copied in to safeguarding emails. I don't</p> <p>4 remember IMB then ever responding specifically on</p> <p>5 a chain. I don't remember that happening. I remember</p> <p>6 communication being quite little.</p> <p>7 Q. One final question, Mr Wilson, is, looking back on the</p> <p>8 relevant period, and we have gone through it sort of</p> <p>9 chronologically, your relationship personally and as an</p> <p>10 organisation with Brook House management and with</p> <p>11 Home Office managers, do you have any reflections on how</p> <p>12 GDWG were treated and how you were treated?</p> <p>13 A. Yes. It was baffling to me at the time, and I think is</p> <p>14 maybe more so in looking back, I think -- one of</p> <p>15 the things I never understood -- what we have discussed</p> <p>16 and discussed in the statements, there were specific</p> <p>17 things that management brought to me at particular</p> <p>18 points, none of which I felt were -- you know,</p> <p>19 I responded as best I could to those concerns, but there</p> <p>20 was never -- there was very little I felt was justified</p> <p>21 or required, you know, corrective measures by us or that</p> <p>22 were something we needed to apologise for or amend for.</p> <p>23 What I didn't understand -- I didn't understand, and</p> <p>24 don't understand, what was behind that and the culture</p> <p>25 that we were facing in terms of this deep suspicion and</p> <p style="text-align: center;">Page 99</p>
<p>1 meetings, were very friendly to us, but we were</p> <p>2 expecting there to be some reflection going on at the</p> <p>3 IMB about how the incidents during the relevant period</p> <p>4 happened, how they'd missed them, given their very</p> <p>5 active presence in the centre, and not for them to, you</p> <p>6 know, acknowledge responsibility or to have an awareness</p> <p>7 of that, to be learning from it, to want to -- and, from</p> <p>8 our point of view, we thought we could only help them in</p> <p>9 doing their role in raising issues to them so that they</p> <p>10 could -- we could help them to help make it a safer</p> <p>11 environment. We were expecting that kind of tone to the</p> <p>12 meeting, and instead, although, again, they were</p> <p>13 friendly, there's a lot of, you know, this note</p> <p>14 accurately captures they were very defensive and, it</p> <p>15 felt to us, were very much apologising for G4S, for</p> <p>16 Brook management, what had happened.</p> <p>17 Q. We heard evidence from Anna Pincus yesterday that the</p> <p>18 relationship with the IMB, and certainly her confidence</p> <p>19 in them, improved going forward. She referred to there</p> <p>20 being a new chair. You were still at GDWG for another</p> <p>21 year or so after this, I think. Was that your</p> <p>22 experience, that the relationship improved or that your</p> <p>23 confidence in them improved at all?</p> <p>24 A. That feels right, although I don't remember, during</p> <p>25 2018 -- so my last year at GDWG, I don't remember very</p> <p style="text-align: center;">Page 98</p>	<p>1 the need to restrict our work, because we were clear --</p> <p>2 I didn't see how we were a threat. We weren't even --</p> <p>3 and we would have been legitimate if we had been</p> <p>4 qualified to do the things and we were doing them, but</p> <p>5 we weren't giving legal advice, we weren't counselling.</p> <p>6 We gave clear parameters for our visitors around -- you</p> <p>7 know, we were working in a wider sense of</p> <p>8 the organisation for reform of the detention system, and</p> <p>9 particularly for an end to indefinite detention, but</p> <p>10 that was very much about wider policy reform. We</p> <p>11 weren't protesting about the Gatwick centres in</p> <p>12 particular. We made volunteers agree not to take part</p> <p>13 in protests outside the centres or do anything that</p> <p>14 might harm our relationship with management.</p> <p>15 In terms of all that our work was doing, you know,</p> <p>16 in effect, we were offering additional support to people</p> <p>17 detained who were -- for whatever reason, the staffing</p> <p>18 levels seemed extremely stretched, there were clearly</p> <p>19 things being missed. We were -- were being -- and --</p> <p>20 were in discussions, such as the request to have</p> <p>21 a presence within welfare. In effect, we were</p> <p>22 offering -- I think I use this phrase in my witness</p> <p>23 statement. We were, and were offering to further be, an</p> <p>24 auxiliary form of welfare service. That's not</p> <p>25 necessarily what GDWG would have -- how we would have</p> <p style="text-align: center;">Page 100</p>

1 framed that or, you know, there's a wider thing about
 2 whether charities should be doing that. But that's what
 3 we effectively were doing. We were flagging up
 4 everything when we thought that was appropriate to do
 5 so. I didn't see, and don't see, how that was anything
 6 other than a help to the centre, and so this deep
 7 suspicion of us was mystifying, and is mystifying.

8 MR LIVINGSTON: Thank you, Mr Wilson. Those are all my
 9 questions, chair. You may have some questions.

10 THE CHAIR: Thank you. I do have a few, Mr Wilson. One of
 11 the questions that I had relates, in one respect, to the
 12 IMB but a little bit more broadly as well. I understand
 13 from how you've explained it where you did have
 14 concerns, whether we describe those as safeguarding --
 15 if I give an example of the kind of thing that I mean.
 16 So if somebody were to tell one of your volunteers or
 17 members of staff that they felt at risk from another
 18 person, another detained person, or from a member of
 19 staff, or that a use of force had been used against them
 20 and that they felt it had been excessive, those kind of
 21 concerns. I understand from your evidence that you may
 22 have made case-by-case decisions on whether or not -- to
 23 whom you would report particular concerns like that.

24 My question, really, is whether, as an organisation,
 25 you kept records yourselves. Even if you decided not to

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1 disclose that information or to make a referral or to
 2 raise a complaint, did your staff, did your
 3 organisation, keep records yourself so that you had
 4 a picture of the type of issues that were being raised?

5 **A. Yes. We had an access database for all interactions**
 6 **from the office with clients, and we would have**
 7 **completed it -- endeavoured to complete a case note on**
 8 **every interaction and for every action we were doing for**
 9 **a client.**

10 THE CHAIR: Had you been asked to provide anonymised data in
 11 whatever form you needed to, would you -- could you --
 12 have provided that to G4S, the Home Office and the IMB
 13 to give them a picture of the type of issues that were
 14 being raised to you as an organisation?

15 **A. We certainly would have endeavoured to do that. The**
 16 **barrier would have been a technological one. We were**
 17 **using quite a limited access database that was based**
 18 **a lot around text, notes, rather than categories, so**
 19 **analysis of those notes at points would have been**
 20 **difficult. It might have been difficult to draw some of**
 21 **those issues out. That would have been the barrier.**

22 THE CHAIR: I suspect I know the answer to this --

23 **A. We --**

24 THE CHAIR: Sorry, do go ahead. I was going to say, were
 25 you ever asked for that information from either the

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1 Home Office, G4S or the IMB?

2 **A. No. To my recollection, no.**

3 THE CHAIR: Connected to that, we heard from Ms Pincus
 4 yesterday that she had experience of detainees being
 5 told directly not to make complaints by a member of
 6 staff. Did you have any experience of that or observe
 7 any of that yourself?

8 **A. I don't recall personally, and I was -- because we were**
 9 **a small team -- speaking to clients, visiting clients,**
 10 **myself, but less so than other members of staff.**
 11 **I don't recall clients saying that to me directly.**
 12 **I remember certainly a culture of a great reluctance to**
 13 **raise complaints for a variety of reasons.**

14 THE CHAIR: But you can't think of any particular instances
 15 yourself?

16 **A. I can't think of examples of a client reporting to me**
 17 **that a staff member had actually said that explicitly,**
 18 **"Do not make a complaint". Just that it was not**
 19 **encouraged. It wasn't something clients felt able to**
 20 **do.**

21 THE CHAIR: What about members of your organisation
 22 reporting to you that detained people had said that to
 23 them? Does that make sense? Did you hear --

24 **A. I don't remember that happening.**

25 THE CHAIR: Thank you. That's helpful. The other question

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1 that I had for you was in relation to the meeting that
 2 you told us about on 18 August, which you described as
 3 hostile. One of the things that you said was mentioned
 4 in that meeting was that you talked about -- I will read
 5 it to you, just so I'm not kind of paraphrasing you:
 6 "I repeatedly pointed out that it was legitimate for
 7 GDWG to raise concerns about detainees."
 8 You said in your statement that Mr Skitt's response
 9 was:
 10 "But are you being audited?"
 11 Can I just clarify, at that meeting when that was
 12 said, was Paul Gasson from the Home Office present in
 13 that meeting?

14 **A. Yes.**

15 THE CHAIR: Do you remember him saying anything in relation
 16 to the question of being audited?

17 **A. I don't recall him doing that, no.**

18 THE CHAIR: Thank you. That's helpful. They're the end of
 19 my questions. Thank you very much, Mr Wilson.

20 MR LIVINGSTON: Chair, thank you, and thank you, Mr Wilson.
 21 Chair, if I might suggest we have possibly
 22 a five-minute break or so, maybe a ten-minute break, so
 23 that we can then proceed with reading in evidence. So
 24 I would suggest, if you are okay with it, returning at
 25 12.40 pm?

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26 (Pages 101 to 104)

<p>1 THE CHAIR: That's fine. Mr Wilson, thank you very much.</p> <p>2 It has been a long morning, I'm sure, but I'm very</p> <p>3 grateful for your evidence.</p> <p>4 A. Thank you.</p> <p>5 (The witness withdrew)</p> <p>6 THE CHAIR: We will see you at 12.40 pm.</p> <p>7 (12.32 pm)</p> <p>8 (A short break)</p> <p>9 (12.44 pm)</p> <p>10 MS MOORE: We are now moving on to some evidence in respect</p> <p>11 of three detained persons who are not able to attend to</p> <p>12 give live evidence at this time. First in respect of</p> <p>13 D2033. Chair, we have received a witness statement from</p> <p>14 D2033 which is at <DL0000149>. I would ask for that to</p> <p>15 be adduced in full.</p> <p>16 THE CHAIR: Thank you.</p> <p>17 MS MOORE: Counsel to the Inquiry have also prepared</p> <p>18 a summary of that statement. D2033 has requested,</p> <p>19 through his representatives, that Mr Goodman be</p> <p>20 permitted to read out the inquiry's summary of his</p> <p>21 evidence, and, chair, you agreed to that request.</p> <p>22 THE CHAIR: Indeed, thank you.</p> <p>23 MS MOORE: As such, you will now hear that summary from</p> <p>24 Mr Goodman.</p> <p>25</p> <p style="text-align: center;">Page 105</p>	<p>1 House. He states that the Home Office did not accept</p> <p>2 this and had given him an earlier date of birth. Last</p> <p>3 year, the Upper Tribunal decided to accept his date of</p> <p>4 birth as claimed but the Home Office continues to state</p> <p>5 he was born earlier, despite the Upper Tribunal's order.</p> <p>6 The documents are available, but not being adduced</p> <p>7 at present:</p> <p>8 "I was detained at Brook House IRC from 3 April 2017</p> <p>9 until 11 April 2017, when I was unlawfully removed from</p> <p>10 the UK to Germany.</p> <p>11 "I myself don't remember which wing I was kept on,</p> <p>12 but I know that I was transferred from one wing to</p> <p>13 another during [this] week that I was at Brook House.</p> <p>14 Because I had argued with the officers about my age</p> <p>15 during the induction, they put me in an isolation wing.</p> <p>16 I have been advised by my solicitors that this was</p> <p>17 probably E wing. After a couple of days they put me in</p> <p>18 a wing where I had to share a room. Again I complained</p> <p>19 to the officers I was under 18 and then I was moved back</p> <p>20 to an isolation wing and from there I was unlawfully</p> <p>21 removed to Germany."</p> <p>22 I summarise paragraphs 7 to 12 as follows.</p> <p>23 D2033 provides some detail about his background,</p> <p>24 including that he was kidnapped, tortured and sexually</p> <p>25 abused in Afghanistan and his brother and father were</p> <p style="text-align: center;">Page 107</p>
<p>1 Reading in Evidence re D2033</p> <p>2 MR GOODMAN: Chair, thank you for the opportunity. D2033</p> <p>3 has asked me to thank you specifically for this because</p> <p>4 he is too unwell to attend himself and give evidence,</p> <p>5 and he is grateful for the opportunity for his statement</p> <p>6 to be read through me, his counsel. Can I also thank</p> <p>7 the inquiry counsel and solicitor team and of course the</p> <p>8 staff, and particularly the stenographers for their hard</p> <p>9 work and impeccable work throughout this.</p> <p>10 So this is the witness statement of D2033:</p> <p>11 "I D2033, [redacted date of birth], state as</p> <p>12 follows:</p> <p>13 "I make this statement as a witness in the inquiry</p> <p>14 into Brook House IRC where I was detained in April 2017</p> <p>15 when I was [a minor]. As it has been four years since</p> <p>16 I was detained at Brook House and I have memory problems</p> <p>17 because I suffer from post-traumatic stress disorder,</p> <p>18 I cannot recall every detail ... I reserve to right to</p> <p>19 add or amend my account at a later date, in particular</p> <p>20 in light of the content of further disclosure received</p> <p>21 from the inquiry or questions posed by the inquiry."</p> <p>22 I summarise paragraphs 2 to 4 as follows. D2033</p> <p>23 provides his full name and states he is a national of</p> <p>24 Afghanistan. He provides his date of birth, which would</p> <p>25 make him a minor at the time of the detention in Brook</p> <p style="text-align: center;">Page 106</p>	<p>1 killed. He arrived in the UK and was looked after by</p> <p>2 social services and then by his uncle. He accessed</p> <p>3 mental health services in the community, was diagnosed</p> <p>4 with PTSD and depression, and was started on medication.</p> <p>5 D2033 is still working for a decision on his claim to</p> <p>6 asylum.</p> <p>7 "Detention". Paragraph 13:</p> <p>8 "I was detained by the Home Office after I attended</p> <p>9 the reporting centre in Croydon on 3 April 2017. Prior</p> <p>10 to being asked to report on this date, I had not</p> <p>11 previously been required to report to the Home Office.</p> <p>12 I did not expect that I would be taken to a detention</p> <p>13 centre from the reporting centre and so I had not</p> <p>14 brought my medication with me or other belongings such</p> <p>15 as spare clothes and toiletries. When the Home Office</p> <p>16 took me to a detention centre from the reporting centre,</p> <p>17 this dealt me a mental shock. When I saw what the</p> <p>18 detention centre was like, I became very afraid. The</p> <p>19 act of taking me to the detention centre conjured up all</p> <p>20 of the memories of what had happened to me in</p> <p>21 Afghanistan when I was abducted and detained against my</p> <p>22 will.</p> <p>23 "Induction.</p> <p>24 "I was taken to Brook House from the reporting</p> <p>25 centre in the evening after I had waited at the</p> <p style="text-align: center;">Page 108</p>

27 (Pages 105 to 108)

<p>1 reporting centre until the evening. When we entered 2 through the main entrance there was a reception and the 3 officers took me to the reception and went through the 4 induction and registration process with me. In the 5 meantime the officers were joking about me and laughing 6 at me. They were asking me ridiculous questions, 7 whether I was working with the army and whether I had 8 killed any people because I am from Afghanistan. 9 I found this very confusing and insulting, especially as 10 I was a child at the time. During the induction, I was 11 asked a number of questions, but I don't now remember 12 them. It was very stressful for me being detained and 13 on top of that the officers asked me very offensive; 14 questions. 15 "I found the entire induction process to be very 16 stressful. I never had an experience like it before and 17 I haven't since. It was dark when I arrived at 18 Brook House sometime between 7 pm and 10 pm. After the 19 induction they just put me in a cell on my own. As soon 20 as I arrived in this cell, I was locked in by officers. 21 It was an experience like nothing I had ever encountered 22 I was very scared and afraid and anxious. It was a real 23 shock to me. It felt like they had dealt me a real 24 psychological blow, worsening my feelings of self-harm 25 and suicide, which I had been experiencing since my</p> <p style="text-align: center;">Page 109</p>	<p>1 a result of this I was put in an isolation wing for 2 something like two nights. 3 "Physical environment. 4 "I don't know which wing I was accommodated in at 5 Brook House, but my solicitors have told me that it was 6 E wing. When I arrived at the wing on my first night 7 I realised that the wing I had been placed in was where 8 the troublemakers or disturbed people were, those who 9 were fighting and causing trouble. It was clear that 10 this was an exceptional wing for exceptional people. 11 The reason why I say this is that when I was taken to my 12 room the troublemakers were shouting and banging on the 13 doors to their rooms. The person just next to my room 14 was constantly kicking the door throughout the night. 15 This was very alarming. 16 "After around two nights, I was transferred to 17 another wing where they mixed me with adults. I was 18 placed in a cell with one other man, but several people 19 came and left whilst I was there. It was scary for me 20 to share with adults. I wasn't able to sleep at night 21 and I always worried that my roommate might attack me or 22 sexually assault me during the night. I think that 23 I was especially afraid of this because of my past 24 experiences of sexual assault in Afghanistan. I pleaded 25 with the officers that I should be kept somewhere safe</p> <p style="text-align: center;">Page 111</p>
<p>1 experiences of being captured and tortured in 2 Afghanistan. I felt that the Home Office were making 3 any problems worse considering that I was a very young 4 person and I was already suffering from post-traumatic 5 stress disorder and depression, for which I was 6 prescribed medication. They did not give me a tour of 7 Brook House, and no healthcare professional visited me. 8 I remember that they measured my waist and height during 9 the induction, but I'm not sure whether the person who 10 did this was from the healthcare department. 11 "I do not remember whether I had access to an 12 interpreter during the induction. As far as I can 13 recall, I had to communicate in English. At that time, 14 my level of English was not ... good, but I just did my 15 best to answer [the] questions. From what I can recall, 16 I was asked basic questions such as my name and what 17 country I came from. I didn't know that I could ask for 18 an interpreter. 19 "I don't recall being given any written materials 20 during my induction or being informed of my rights as 21 a detainee. 22 "When I arrived at Brook House I pleaded with the 23 officers to put me somewhere safe as I was a young 24 person and I was afraid. I feared I might be sexually 25 assaulted as I had been in Afghanistan. I think as</p> <p style="text-align: center;">Page 110</p>	<p>1 and transferred back to the first wing where I had 2 a room by myself. Although it wasn't easy for me being 3 in a room by myself, I thought it was preferable to me 4 sharing with adults. When they transferred me to the 5 public wing there was a lady, a middle aged woman, who 6 used to come to check in on me. I think that probably 7 she was from welfare. I believe this was because they 8 realised that I was underage. She used to come and talk 9 to me and ask how I am. Every night she would come to 10 my room. I am not sure how many times, but she came at 11 late hours." 12 Here I'm just going to summarise 13 paragraph 75(c)(ii). D2033 adds that, as far as he can 14 recall, every time he had an opportunity to, he would 15 ask the officers and the lady from welfare if he could 16 transfer rooms. 17 Paragraph 21: 18 "After a few nights, I was transferred back to the 19 first wing where I was detained on the first day. 20 "I am told that this wing is called the Care and 21 Separation Unit, or E wing, but there was no 'care' 22 there. The measures in that wing were very tough and 23 there was a high level of security and custody. I think 24 they kept me in E wing as a precautionary measure as 25 I was underage and they didn't want any problems later</p> <p style="text-align: center;">Page 112</p>

<p>1 on. The people who were kept in this wing were under 2 [strict] supervision. There were around ten detainees 3 held in separate rooms in my corridor and there were 4 around six security guards for these detainees, and so 5 there was a high ratio of guards to detainees. 6 "It was a horrible experience for me being detained 7 at Brook House. Most of the people there were suffering 8 from mental health problems and some of the detainees 9 looked like they were dangerous criminals. Some of them 10 had tattoos on their bodies and looked like very angry 11 people, and this made me feel very afraid. I kept 12 thinking that all I had done was come to the UK to seek 13 asylum and protection and instead the authorities had 14 placed me in detention with dangerous and damaged 15 adults, some of whom were using drugs. 16 "I was afraid that the other detainees would rape 17 me, and I constantly felt in danger. Being detained at 18 Brook House IRC reminded me of the torture that 19 I suffered in Afghanistan, which included rape; it was 20 very traumatising for me. 21 "For a few nights I was kept in a room with another 22 detainee who was very angry and was always shouting and 23 screaming. I was afraid that he would attack me. For 24 those few nights, I could not sleep at all. One time 25 when I returned to the room from getting some food I saw</p> <p style="text-align: center;">Page 113</p>	<p>1 sewn and bleeding. I had no contact with him; all I can 2 tell you is that I saw him in that condition. This was 3 the first time that I had seen that kind of thing and 4 I was scared. That incident always comes back to me and 5 I still have scary nightmares and flashbacks about that 6 incident and about being in detention in general. 7 I understand from my solicitors that they also represent 8 this man in the inquiry and that he is a core 9 participant. 10 "In both wings, the toilet was embedded inside of 11 the room and there was a very narrow partition which 12 made the toilet separate from the rest of the room, but 13 there was no door. It wasn't private. When someone was 14 using the toilet, you could also hear and smell the 15 stench of the toilet. That made me feel an additional 16 psychological blow and emotional torment. I had to wait 17 for the other roommate to go out or to dinner or lunch 18 and then there was a bit of space before I felt 19 comfortable to go to the toilet. Whenever my roommate 20 was in the room I did not feel comfortable to go to the 21 toilet. Being in Brook House was a nightmare for me. 22 "The layout of the shared room was as follows. When 23 you entered the room, in front of you were two 24 detainees' beds and to the side of the room there was 25 a toilet bowl that you could see. So if the other</p> <p style="text-align: center;">Page 115</p>
<p>1 that he had ripped up the bedsheets and made a mess in 2 the room. He had destroyed and broken everything in the 3 room. I felt very afraid; this was like a nightmare for 4 me. At one point this other detainee had a plastic 5 object in his hand and threatened me that if I stepped 6 forward he would hit me up with it. I think it was 7 a plastic knife." 8 He has summarised in paragraph 75(d) as follows. 9 D2033 said he did not have anything of his own in the 10 room, which was destroyed, as he was brought to 11 Brook House in just the clothes he was wearing, although 12 he may have had some documents. 13 Paragraph 26: 14 "After this, I reported [the] incident to the 15 security guards, who swapped that roommate with someone 16 else. Then the next day I again went to the officers 17 saying I'm not happy to share a room with an adult, 18 please put me somewhere safe and they moved me back to 19 the isolation wing. 20 "When I was in the isolation wing, I saw a man in 21 a very bad condition. He had stitched his lips together 22 as a protest and his lips were bloody. He was an 23 Iranian and was on hunger strike as he was going to be 24 returned to Germany. He was in a terrible, dangerous 25 condition, as you would imagine if a person's lips were</p> <p style="text-align: center;">Page 114</p>	<p>1 detainee was on his bed he couldn't see you going to the 2 toilet but if he walked to the side or went to leave the 3 room he could see you. It was not safe, always exposed. 4 It was a small room. 5 "I do not remember exactly the timetable when I was 6 at Brook House. During the night we had to stay in our 7 rooms and during the day there were certain hours when 8 we were allowed to go outside. Sometimes we were 9 allowed to go to the corridors or kitchen and there were 10 some times when we were able to walk to other wings. 11 "Every day when I was at Brook House we had 12 a lock-in for many of the hours. I can't tell you about 13 when exactly in the day that happened. There were times 14 when we were ordered to return to our rooms and [we] 15 were then locked in there. On the first day when an 16 officer told me to go back to my room I had a bad 17 feeling but thought that at least when I was in my room 18 I would be safe. Although the door to my room was 19 locked, I could hear a lot angry people around me 20 banging on their cells and shouting, which was very 21 scary. Naturally nobody likes to be locked in against 22 their will, but that was what it was. As humans, we 23 like to be free, but they had imposed these conditions 24 against me and there was nothing I could do about it. 25 We didn't have the ability to make our own decisions on</p> <p style="text-align: center;">Page 116</p>

<p>1 the wing, but I felt particularly bad when the security</p> <p>2 personnel ordered me to return to my room and locked the</p> <p>3 door on me.</p> <p>4 "In terms of activities to do, there was a billiard</p> <p>5 table and TV in the corridor and sometimes the officers</p> <p>6 gave me a pen and paper and then I had an opportunity to</p> <p>7 draw something. I'm not sure if there were education</p> <p>8 opportunities available. If there were then nobody told</p> <p>9 me about them. There was also a gym but I didn't go</p> <p>10 there. It was a very stressful time for me and I wasn't</p> <p>11 in a position to go to the gym and have fun. I was</p> <p>12 always scared of the others around me.</p> <p>13 "Shortly after I arrived at Brook House, I went to</p> <p>14 the healthcare department to ask for my antidepressant</p> <p>15 medication and the doctor sent me out of the room. I do</p> <p>16 not remember the name of the doctor. The way he forced</p> <p>17 me to leave the room felt very inhumane when I was</p> <p>18 seeking help. On this occasion, I had gone to the</p> <p>19 healthcare department to ask for my medication for my</p> <p>20 mental health. I didn't have a prescription with me,</p> <p>21 but I told the staff that I had been taking the</p> <p>22 medication before I was detained. The doctor began to</p> <p>23 speak on the phone and then he told me to leave the room</p> <p>24 in a very rude and bad manner. I didn't expect that</p> <p>25 from a doctor.</p> <p style="text-align: center;">Page 117</p>	<p>1 forcibly removed me I felt very betrayed and deceived.</p> <p>2 "I do not remember about the regime of accessing the</p> <p>3 telephone inside the detention centre but I remember</p> <p>4 when my maternal uncle came to visit me he gave me an</p> <p>5 old phone as we were not allowed a smartphone. Before</p> <p>6 my uncle provided me a telephone I had to use the</p> <p>7 detention centre phone. The extension centre staff</p> <p>8 never offered me a mobile phone to use when I was</p> <p>9 detained; I just had to make do with ... the public</p> <p>10 phone. I can't remember exactly how long it was before</p> <p>11 my uncle brought me a phone. I think they put me in</p> <p>12 detention on Monday and I think it was Friday when my</p> <p>13 uncle came to visit. So from around Monday until ...</p> <p>14 Friday I did not have a personal telephone.</p> <p>15 "As far as I recall, the only visit I had was from</p> <p>16 my uncle. I think it was a Friday when he came to</p> <p>17 visit, but I am not sure. It was quite a short amount</p> <p>18 of time. The security guards were present and told us</p> <p>19 when we had to finish. I'd never been detained before</p> <p>20 in the past apart from the incident when I was kidnapped</p> <p>21 in Afghanistan and so when I met with my maternal uncle</p> <p>22 he was trying to encourage me to be brave and patient.</p> <p>23 It was very hard for me to [be] strong.</p> <p>24 "Access to legal advice.</p> <p>25 "At the time that I was detained, I was represented</p> <p style="text-align: center;">Page 119</p>
<p>1 "As far as I can recall, there was no interpreter</p> <p>2 available for me at all when I was at Brook House.</p> <p>3 I had to just make do as best I could. My English was</p> <p>4 not so good at the time, and so it was difficult for me,</p> <p>5 but I had no choice. At one point, when the Home Office</p> <p>6 wanted to remove me to Germany the officer had an</p> <p>7 interpreter over the phone and that was when I was told</p> <p>8 I was going to be removed to Germany. I believe that</p> <p>9 this was one or two days before my removal. I was taken</p> <p>10 to an office and told that I would be removed to</p> <p>11 Germany. As far as I can remember, this was the only</p> <p>12 time that I was provided with an interpreter at</p> <p>13 Brook House. I never had an interpreter when I visited</p> <p>14 the healthcare department.</p> <p>15 "When I saw the immigration officers at the</p> <p>16 detention centre, they said to me, 'We are going to</p> <p>17 remove a group of people back to Germany but you are not</p> <p>18 among them'. The day after this they came and took me</p> <p>19 and I found out I was going to be removed. Being told</p> <p>20 this made me feel like I had been tricked and deceived.</p> <p>21 They gave me false hope and I thought that I had</p> <p>22 a chance to be released from the detention centre and</p> <p>23 back to my uncle. My solicitors at the time had told me</p> <p>24 that they were trying to get me released on bail. When</p> <p>25 the officers came in the middle of the night and</p> <p style="text-align: center;">Page 118</p>	<p>1 by a different solicitor's firm. It was my maternal</p> <p>2 uncle who was in contact with my solicitor. As far as</p> <p>3 I knew they were trying to stop my removal and bail me</p> <p>4 out of detention. I had two conversations with my legal</p> <p>5 representatives when I was in detention. The first time</p> <p>6 when I contacted him, I was at the reporting centre and</p> <p>7 had been told that I would be detained. I told my legal</p> <p>8 representative that I had not been allowed to leave the</p> <p>9 reporting centre and my solicitor told me not to worry,</p> <p>10 that he was going to sort things out. The second time</p> <p>11 was when I was on the bus on the way to the plane. This</p> <p>12 was the last time that I spoke to him. I never had</p> <p>13 a meeting with my legal representative inside detention.</p> <p>14 "Treatment.</p> <p>15 "When I was detained at Brook House IRC, I was still</p> <p>16 a young person ... It was mentally very hard for me</p> <p>17 being detained, and the way that I was treated was</p> <p>18 beyond my worst expectations. As I have explained</p> <p>19 above, during the induction the immigration officers</p> <p>20 spoke in a degrading and insulting way towards me.</p> <p>21 However, throughout my time in detention the staff did</p> <p>22 not behave in a good way towards me. There were many</p> <p>23 security guards working at Brook House. Some were good,</p> <p>24 some gave me the impression they did not like immigrants</p> <p>25 at all and behaved in an unwelcoming manner towards me</p> <p style="text-align: center;">Page 120</p>

<p>1 and some were in the middle. The guards were always 2 being verbally abusive towards me, but they were never 3 physically abusive. I never witnessed the guards being 4 physically abusive to the other detainees, but from what 5 I can remember, staff were often behaving in a verbally 6 abusive and degrading way to other detainees. For 7 example, when we were told to return to our cells for 8 lock-in, the detention centre staff would tell us very 9 rudely and aggressively to get to our cells. They would 10 act like our bosses rather than requesting politely that 11 we do this. Another example is when I wanted my 12 medicine and pressed the bell, a female officer would 13 come and from behind the door would ask rudely what 14 I was pressing the bell for. On another occasion, 15 a guard came to my room and asked me to go with them to 16 another room where I was asked a number of questions. 17 I was alone with him in the room without an interpreter 18 and he asked me a number of questions regarding what 19 I had done in Afghanistan and how I had come to [be in] 20 the UK. I can remember this man clearly even now. He 21 was around 35 years old, balding and carrying a bit of 22 extra weight. I did not want to ask [the] questions as 23 I felt that he was not from the Home Office and so I did 24 not see why he needed to ask me these questions. His 25 behaviour made me feel like he did not like foreigners</p> <p>Page 121</p>	<p>1 welfare team who would regularly check on me at night to 2 see how I was doing." 3 I'm just going to interpolate a summary of 4 paragraph 76 here. 5 D2033 emphasises that he was constantly telling the 6 detention centre staff that he was a minor. He says 7 that most of the time he told them this they didn't seem 8 to care or to be concerned for his welfare. Meaning he 9 had to plead and keep requesting that he was a minor and 10 that it was not safe for him to be detained or to share 11 with adults before anyone took any notice. 12 Paragraph 42. "Use of Force": 13 "When I was removed to Germany, I was physically 14 assaulted during the removal process. I was restrained 15 with handcuffs and I sustained an injury to my wrists. 16 Initially, about four to six Brook House security staff 17 came to the room in the early hours of the morning and 18 said, 'You will be taken to Germany'. The officers were 19 wearing full riot gear with batons and shields and so 20 I felt that I could not resist them. They handed me to 21 other officers who fitted a waist restraint belt which 22 was connected to handcuffs around me. I remained in 23 this waist restraint belt and handcuffs until I reached 24 Germany. I think that the handcuffs were made of 25 plastic but I cannot remember exactly. These officers</p> <p>Page 123</p>
<p>1 and I found his manner of questioning to be offensive. 2 "During the induction, when I told the staff that 3 I was [a minor], they just began laughing at me. When 4 I asked them to at least put me in a separate room 5 because of my age, they just laughed at me. I was 6 crying and begging the guards that I didn't want to be 7 kept in the a room with adults. In the end, they gave 8 me my own room for a night or two and then I shared with 9 someone else. 10 "One day I was walking down a corridor and saw 11 a woman walking the other way. I asked her if I could 12 speak to her. I later visited her in the welfare 13 department and told her that I am [a minor]. But the 14 officers are not listening to me. I told her that 15 I have my Taskera to prove it. A Taskera is an Afghan 16 photographic identity document stating a person's name 17 and age. I asked my maternal uncle to get my Taskera to 18 me, which he did. I told her about my situation and she 19 was helpful and listened. She said that if I can prove 20 that I am under 18 years old, the Home Office won't be 21 allowed to send me to Germany. This gave me hope but 22 later I brought my Taskera in to the Home Office at the 23 detention centre, but they disregarded it and still sent 24 me to Germany. The lady at the welfare department then 25 shared what I had told her with a colleague in the</p> <p>Page 122</p>	<p>1 were not in full riot gear but they were wearing their 2 normal uniform which I think was black and had the name 3 of their company on it. 4 "I do not remember the name of the company they were 5 working for. My solicitors told me that the second 6 group of officers worked for a different company to the 7 officers who were at Brook House but to me they were all 8 connected to Brook House and part of the same 9 experience. 10 "I screamed and tried as much as I could to stop 11 them taking me to the airport, but it was no use I was 12 clinging onto the handrails in order to resist being 13 taken with the officers. 14 "The officer deliberately placed himself in 15 a comfortable position, kneeling on the chair with one 16 leg and standing with the other so that he could drag me 17 with ease. He fitted another pair of handcuffs around 18 one of my wrists and he held the other handcuff in his 19 hand so that he could pull me out of the bus when 20 I resisted. 21 "When he was unable to forcibly remove me from the 22 bus, he called several of his colleagues over. The 23 officers were so aggressive in forcing me to come with 24 them that they pulled my trousers off. My trousers came 25 off when the four or five officers were trying to force</p> <p>Page 124</p>

<p>1 me off the bus. They were pulling my legs and arms and</p> <p>2 using all of the force that they could to pull me out of</p> <p>3 the bus. It was in this struggle that my trousers came</p> <p>4 off. When the officers were pulling my arms and wrists</p> <p>5 using the handcuffs it felt like my arm was coming off.</p> <p>6 One end of the handcuff was around my wrist and the</p> <p>7 other was in his hand and he pulled me along using the</p> <p>8 handcuffs. I still have scars on my wrists from the</p> <p>9 handcuffs from when they dug into my skin leaving deep</p> <p>10 bloody cuts on my wrists. My whole body was hurting.</p> <p>11 It felt like I had been beaten up for the next few days.</p> <p>12 They then put us onto the plane and then we were</p> <p>13 deported to Germany. It was not until I got onto the</p> <p>14 plane that I was able to pull my trousers up. Before,</p> <p>15 they had been around my ankles, since the officers</p> <p>16 pulled them off and I was so focused on resisting</p> <p>17 removal that I wasn't interested in pulling them up</p> <p>18 until I knew I had no hope of resisting removal anymore.</p> <p>19 Throughout the whole of the journey to Germany on the</p> <p>20 plane I was restrained. One officer was sitting to one</p> <p>21 side of me holding my arms and legs, and another officer</p> <p>22 on the other side holding my arms and legs. There was</p> <p>23 another officer behind me forcibly holding my head.</p> <p>24 I could not move at all. I told the officers that the</p> <p>25 handcuffs and belt were very tight and causing me a lot</p> <p style="text-align: center;">Page 125</p>	<p>1 I returned to the isolation wing from the public wing,</p> <p>2 that guy was still there. We were all treated badly and</p> <p>3 without respect, but apart from the incident where the</p> <p>4 officers taunted me during the induction, which I think</p> <p>5 may have been due to me being from Afghanistan and the</p> <p>6 stereotype they had about people from Afghanistan being</p> <p>7 connected to the Taliban or the army, I do not believe</p> <p>8 that I was specifically singled out to be treated badly</p> <p>9 because of my ethnicity, nationality or religion, but</p> <p>10 this may have been why they treated us all badly.</p> <p>11 "Use of Force.</p> <p>12 "I have described how force was used on me to remove</p> <p>13 me and when I was in the plane. I was assaulted and</p> <p>14 physically restrained and put in waist restraints and</p> <p>15 handcuffs. They did this even though I was a young</p> <p>16 person and had mental health problems. When I was</p> <p>17 detained in the isolation wing, there was another Afghan</p> <p>18 boy detained near to me. He was making a lot of noise</p> <p>19 and banging the doors. I remember that on one occasion</p> <p>20 a member of staff did restrain this Afghan boy in</p> <p>21 another room because he was causing so much fuss. I can</p> <p>22 remember hearing him shouting and kicking and punching</p> <p>23 the door. I think this happened when I was brought back</p> <p>24 to the isolation wing at the end of my detention.</p> <p>25 "Rule 35.</p> <p style="text-align: center;">Page 127</p>
<p>1 of pain. But they told me that I would need to wait</p> <p>2 until I arrived in Germany until they could remove my</p> <p>3 handcuffs. It is very distressing for me to think about</p> <p>4 or talk about this incident. The way that I was</p> <p>5 forcibly removed, handcuffed and dragged like an animal</p> <p>6 onto the plane was very inhumane and dealt</p> <p>7 a psychological blow to me and is not something I will</p> <p>8 forget."</p> <p>9 I summarise paragraph 78 here. D2033 goes on in</p> <p>10 more detail in his statement about the impact removal to</p> <p>11 Germany had on him, in particular on his mental health.</p> <p>12 He says he was in physical pain following the removal</p> <p>13 but, moreover, in psychological pain and in despair.</p> <p>14 Returning to paragraph 43:</p> <p>15 "I remember on another occasion a detainee cut his</p> <p>16 wrist and it was very bloody and the detention centre</p> <p>17 staff called an ambulance. This was another incident</p> <p>18 I will never forget. That was a very horrible moment</p> <p>19 for me. I think they took him to the hospital. I think</p> <p>20 this happened when I was in the public wing.</p> <p>21 "When I was in the isolation wing, in the next room</p> <p>22 to me there was a guy who was constantly beating and</p> <p>23 punching the door. There was no way to stop him from</p> <p>24 doing this. This was very scary for me. The door was</p> <p>25 locked to my room and it was very noisy. When</p> <p style="text-align: center;">Page 126</p>	<p>1 "I did not have a rule 35 report prepared for me by</p> <p>2 the healthcare department whilst I was in detention.</p> <p>3 I am not aware of what a rule 35 report is and no-one</p> <p>4 explained to me what a rule 35 report is or its purpose</p> <p>5 while I was at Brook House. I cannot remember whether</p> <p>6 or not I was asked and told a doctor at the detention</p> <p>7 centre about the torture I sustained in Afghanistan, but</p> <p>8 my solicitors have confirmed to me that, according to my</p> <p>9 medical records, I did inform a nurse when I first</p> <p>10 arrived and I was to discuss it with a doctor. However,</p> <p>11 I was not offered an appointment for a doctor at the</p> <p>12 detention centre to examine my scars.</p> <p>13 "If I had had the opportunity, I would do everything</p> <p>14 not to be separated from my family, including requesting</p> <p>15 a rule 35 report. But I unfortunately did not have this</p> <p>16 opportunity.</p> <p>17 "I had an appointment with Freedom from Torture when</p> <p>18 I was detained but I missed this appointment. Then,</p> <p>19 when I was in detention, Freedom from Torture called me</p> <p>20 and asked why I did not attend this appointment and</p> <p>21 I said that I was in detention and they said, sorry, and</p> <p>22 that they wished they could help.</p> <p>23 "ACDT.</p> <p>24 "Whilst I was detained at Brook House, my mental</p> <p>25 health was very poor. Even before I was detained, I had</p> <p style="text-align: center;">Page 128</p>

<p>1 considered ending my life and I had even made an attempt</p> <p>2 to do so by walking in front of incoming traffic. Being</p> <p>3 detained just made my suicidal feelings worse. Because</p> <p>4 of my suicidal thoughts, I was placed under constant</p> <p>5 watch and supervision. The level of supervision was</p> <p>6 particularly strong when I was detained on the isolation</p> <p>7 wing which my solicitors say was called E wing. I think</p> <p>8 it might have been because I was seen to be a danger to</p> <p>9 myself. I was under immense psychological pressure when</p> <p>10 I was detained at Brook House. I wanted to self-harm</p> <p>11 but couldn't find anything to harm myself with, such as</p> <p>12 a knife, as they gave us plastic cutlery. I could not</p> <p>13 believe that, despite the past problems I had been</p> <p>14 through, the Home Office just took me and detained me in</p> <p>15 a place that I never imagined myself in. This made me</p> <p>16 feel hopeless.</p> <p>17 "Being observed all day felt intrusive and</p> <p>18 uncomfortable. At all times I felt like someone was</p> <p>19 watching me or following me, like someone was filming</p> <p>20 me. Being watched all of the time actually made my</p> <p>21 mental health and suicidality worse. I felt restricted</p> <p>22 all of the time."</p> <p>23 Here I just summarise paragraph 84 of the witness</p> <p>24 statement. D2033 cannot be sure why he was under</p> <p>25 supervision but believes it might be due to his age or</p> <p style="text-align: center;">Page 129</p>	<p>1 "Clinical care issues.</p> <p>2 "As I have explained above, when I was detained at</p> <p>3 Brook House, I was mentally unwell and psychologically</p> <p>4 under pressure and I suffered more than I ever imagined</p> <p>5 myself due to being in a place like that. I saw people</p> <p>6 with knife wounds and I was kept in a room by myself.</p> <p>7 I always felt stressed, worried, concerned, scared</p> <p>8 someone would assault me, including sexual assault, from</p> <p>9 the day they took me there to when I was released.</p> <p>10 "When I was at Brook House I couldn't sleep at night</p> <p>11 due to the concerns I had about my future. When they</p> <p>12 were doing the registration process at Brook House,</p> <p>13 I told them I am taking medication. That night, they</p> <p>14 didn't give me medication and the same the following</p> <p>15 night. There was a two- to three-day gap between when</p> <p>16 I arrived at the detention centre and when I began</p> <p>17 receiving the medication.</p> <p>18 "During the time that I wasn't receiving medication,</p> <p>19 I used to push the emergency button to ask for my</p> <p>20 medication and the officers came to me and I told them</p> <p>21 I needed my medication or else I would not be able to</p> <p>22 sleep. I would often have to wait for someone to answer</p> <p>23 the buzzer and, even then, they did not provide me with</p> <p>24 my medication and did not seem to care about the impact</p> <p>25 of me stopping taking my medication on me. When they</p> <p style="text-align: center;">Page 131</p>
<p>1 due to his disclosures about his mental health, and</p> <p>2 notes that, when he arrived, he was scared, crying and</p> <p>3 pleading to be put somewhere safe. He says no-one</p> <p>4 explained to him what an ACDT was. He said he felt</p> <p>5 under enormous pressure and stress and being locked in</p> <p>6 and monitored did not help at all.</p> <p>7 Returning to paragraph 51 of the statement:</p> <p>8 "Food refusals.</p> <p>9 "Although I didn't have the appetite to eat or drink</p> <p>10 when I was at Brook House, I never refused food and</p> <p>11 fluids in protest at the way I was being treated. When</p> <p>12 I was hungry, I ate and drunk, but often, because of how</p> <p>13 distressed I was, I didn't feel like it.</p> <p>14 "Drugs.</p> <p>15 "I never used drugs when I was detained at</p> <p>16 Brook House. At one point, another detainee told me it</p> <p>17 was possible to get illegal drugs, but I did not witness</p> <p>18 anyone taking or using drugs or illegal highs.</p> <p>19 "Protests.</p> <p>20 "I did not participate in any protests while I was</p> <p>21 at Brook House. I didn't see any mass protests. But</p> <p>22 I did see individual detainees doing things like banging</p> <p>23 doors, sewing their lips together and cutting their</p> <p>24 arteries, which I think might have been a protest</p> <p>25 against being detained.</p> <p style="text-align: center;">Page 130</p>	<p>1 didn't provide the medication, I would go myself to</p> <p>2 healthcare to get the medication."</p> <p>3 I now summarise paragraphs 77 to 79 and then 80 to</p> <p>4 83.</p> <p>5 D2033 recalls that when his uncle came to visit, he</p> <p>6 brought him his medication, but can't remember if he was</p> <p>7 able to take this to his room or whether he could only</p> <p>8 take medications supplied by healthcare. As far as he</p> <p>9 can recall, he did tell staff he had been prescribed</p> <p>10 medication but cannot be sure if he was able to tell</p> <p>11 them the dose. This was prescribed before his detention</p> <p>12 by a psychiatrist in the community. He does not know if</p> <p>13 the Home Office knew of his diagnosis at the time they</p> <p>14 were made and prior to his being detained.</p> <p>15 80 and 83 are summarised as follows.</p> <p>16 D2033's medical records contain an entry from</p> <p>17 7 April 2017 where he was asked if he had thoughts of</p> <p>18 self-harm or suicide and "I don't know" is recorded.</p> <p>19 D2033 notes in his statement that he doesn't remember</p> <p>20 the conversation as it was so long ago, but as far as he</p> <p>21 can recall, he did not have a Dari interpreter so it is</p> <p>22 possible he did not understand the question. He</p> <p>23 reiterates that he was feeling suicidal throughout his</p> <p>24 detention. He cannot recall each specific event, but he</p> <p>25 thinks he told officers on a number of occasions that he</p> <p style="text-align: center;">Page 132</p>

<p>1 was feeling suicidal and hopeless about his life.</p> <p>2 Turning to paragraph 56:</p> <p>3 "When I was unable to access my medication when</p> <p>4 I was detained, I suffered from tiredness and body</p> <p>5 aches. I also lost my balance and control of my body.</p> <p>6 I didn't know what I was doing. It felt like I had lost</p> <p>7 an important part of myself because I hadn't taken my</p> <p>8 medication and I was so stressed. As I have explained</p> <p>9 above, when I tried to approach a doctor at the</p> <p>10 healthcare department to tell him that I needed my</p> <p>11 medication, he reacted very rudely towards me. After</p> <p>12 this, I repeatedly asked the officers for my medication,</p> <p>13 but it took two to three days before they realised that</p> <p>14 I was being serious when I said that I needed the</p> <p>15 medication.</p> <p>16 "There was a bell in my room that I could ring at</p> <p>17 night and an officer who was on duty who would come to</p> <p>18 me. It was only when this happened repeatedly that they</p> <p>19 realised how much I needed the medication."</p> <p>20 I summarise 82(a) and 82(c). D2033 cannot recall</p> <p>21 a doctor seeing him as part of his induction or on his</p> <p>22 first day. He adds that the doctor who was rude to him</p> <p>23 was aged 50 to 60 with glasses and a greying beard and</p> <p>24 he doesn't recall anyone else being present during this</p> <p>25 incident.</p> <p style="text-align: center;">Page 133</p>	<p>1 medication and give me recommendations on what should</p> <p>2 and shouldn't do, like when I go to my GP now. But he</p> <p>3 didn't seem to be concerned for my welfare. Although</p> <p>4 I wasn't happy with the medical treatment I received at</p> <p>5 Brook House, I didn't make a complaint about it as</p> <p>6 I didn't think there was anyone there to listen to my</p> <p>7 concerns.</p> <p>8 "Complaints and oversight.</p> <p>9 "As far as I can recall, I think that there was</p> <p>10 a complaints box at Brook House but I can't remember</p> <p>11 where it was. Although making a complaint about being</p> <p>12 detained crossed my mind while I was at Brook House, as</p> <p>13 far as I can recall I did not make a complaint. I do</p> <p>14 not feel that I was given the opportunity to raise my</p> <p>15 concerns with anyone when I was in detention. I was</p> <p>16 only a minor and didn't know what to do and was too</p> <p>17 scared and nervous to complain to anyone. As far as</p> <p>18 I can recall, I did not make any complaints about the</p> <p>19 way other detainees were treated when I was at</p> <p>20 Brook House. I did not go to the police with my</p> <p>21 concerns or anyone else. In reality, no-one informed me</p> <p>22 there was a complaints procedure. When I went to the</p> <p>23 welfare department, I informed them that I was under</p> <p>24 18 years old and that I shouldn't be in detention.</p> <p>25 However, as far as I can recall, they never informed me</p> <p style="text-align: center;">Page 135</p>
<p>1 Then from 82(b):</p> <p>2 "I did not feel that the officers appreciated the</p> <p>3 seriousness of me not receiving my prescribed</p> <p>4 medication. The staff were very dismissive, rude and</p> <p>5 harsh, saying things like "It's not in our hands" and</p> <p>6 'You must wait'. This demonstrated that they did not</p> <p>7 care what I was going through. Because I had been</p> <p>8 taking the medication regularly and then I was forced to</p> <p>9 stop taking the medication, the consequences were</p> <p>10 fatigue, body aches, anxiety, bad feelings and thoughts</p> <p>11 of self-harm. I was in shock not only because I did not</p> <p>12 have access to my medication, but also because I had</p> <p>13 been placed in a position which reminded me of my past</p> <p>14 experiences. These acts of detaining me made me feel as</p> <p>15 though I was reliving the experiences of my past."</p> <p>16 Returning to paragraph 58 of the statement:</p> <p>17 "At Brook House, all the healthcare department did</p> <p>18 was to eventually give me my medication. This is very</p> <p>19 different to when I see my doctor now and I explain all</p> <p>20 my problems to them and they help me. At Brook House,</p> <p>21 the healthcare department just didn't care. All I did</p> <p>22 was go to the pharmacy and took my medication and that</p> <p>23 was it. I felt like I didn't have the right kind of</p> <p>24 medical support at Brook House. The doctor should have</p> <p>25 sat down with me when I got there and prescribed</p> <p style="text-align: center;">Page 134</p>	<p>1 of the complaints procedure.</p> <p>2 "I do not know what the Professional Standards Unit</p> <p>3 is or the Independent Monitoring Board or the Prisons</p> <p>4 and Probations Ombudsman. As far as I can recall, I was</p> <p>5 not told that I could complain to these bodies or about</p> <p>6 the complaints procedure.</p> <p>7 "The day after I arrived at Brook House, the</p> <p>8 officers brought an imam to me, who gave me reassurance</p> <p>9 and said 'We pray on Fridays here'. I had no other</p> <p>10 contact with him. I did go to Friday prayers but</p> <p>11 I don't know if it was the same imam who conducted the</p> <p>12 prayers. I was not able to pray inside my room as there</p> <p>13 was no space to do so. As a Muslim, I have to pray five</p> <p>14 times a day, but I wasn't aware that the place where the</p> <p>15 Friday prayers were held was open for praying five times</p> <p>16 a day and I was unable to pray inside my room due to</p> <p>17 lack of space. I was unable to practise my religion</p> <p>18 properly whilst I was detained at Brook House.</p> <p>19 "Because of the emotional and mental pressure I was</p> <p>20 under whilst in Brook House, I was not able to think</p> <p>21 straight in order to ensure that everything was in place</p> <p>22 for me to practise my religion there. All I was</p> <p>23 concerned about at the time was about getting out of</p> <p>24 Brook House, and so it was not possible for me to think</p> <p>25 about anything else, such as when I needed to pray or</p> <p style="text-align: center;">Page 136</p>

<p>1 the fact that I could not do so properly.</p> <p>2 "I did not try to find the imam to see if he could</p> <p>3 help me as, to be honest, I was too scared to leave my</p> <p>4 room as I was afraid somebody might harm me. I also</p> <p>5 didn't think the imam was able to help me with the</p> <p>6 practical problems. I thought he was there just for</p> <p>7 religious support.</p> <p>8 "The imam never told me he would be able to help me</p> <p>9 with any of the concerns I had with being in detention.</p> <p>10 He said a few words to me but I don't remember what he</p> <p>11 said.</p> <p>12 "The welfare department at Brook House seemed</p> <p>13 helpful to me and they provided me with some support,</p> <p>14 but I'm not clear what information they gave to the</p> <p>15 Home Office regarding my age or whether they gave the</p> <p>16 Home Office a copy of my Taskera and, ultimately, the</p> <p>17 Home Office removed me on the basis they claimed I was</p> <p>18 an adult.</p> <p>19 "I do not know whether the people I met with were</p> <p>20 members of Gatwick Detainees Welfare Group but I think</p> <p>21 this is likely.</p> <p>22 "I was not in contact with any other detainees or</p> <p>23 visitors when I was at Brook House and I wasn't aware</p> <p>24 about any other support organisations. Although making</p> <p>25 a complaint about being in detained crossed my mind</p> <p style="text-align: center;">Page 137</p>	<p>1 that's at the end of the statement, chair. It was</p> <p>2 countersigned on behalf of a Dari interpreter on</p> <p>3 19 November 2021. Chair, thank you very much for that</p> <p>4 opportunity.</p> <p>5 THE CHAIR: Thank you, Mr Goodman for that, and also to</p> <p>6 D2033. Thank you.</p> <p>7 MS MOORE: Chair, just a quick note on timings. You will</p> <p>8 see it is about 1.25 pm. In order to ensure that we</p> <p>9 hear all of the outstanding read evidence today, we may</p> <p>10 need to sit a little later than planned, so probably</p> <p>11 just after 2.00 pm, if that suits.</p> <p>12 Chair, D1713 has also provided a statement to the</p> <p>13 inquiry. This is at <BHM000018>. I would ask for this,</p> <p>14 too, to be adduced in full. As with D2033, counsel to</p> <p>15 the inquiry has produced a summary of this evidence.</p> <p>16 You received a request from D1713 via his</p> <p>17 representatives that Ms Profumo be permitted to read out</p> <p>18 this summary. As you agreed to that request, we will</p> <p>19 now be hearing from Ms Profumo.</p> <p>20 Reading in Evidence re D1713</p> <p>21 MS PROFUMO: Chair, as indicated, I now read in the evidence</p> <p>22 of and on behalf of D1713:</p> <p>23 "I, D1713, make this statement to assist the</p> <p>24 Brook House Inquiry. Although I will concentrate on the</p> <p>25 time that I was detained at Brook House, I also cover in</p> <p style="text-align: center;">Page 139</p>
<p>1 whilst I was at Brook House, as far as I can recall,</p> <p>2 I did not make a complaint while I was at Brook House.</p> <p>3 I do not feel that I was given the opportunity to raise</p> <p>4 my concerns with anyone when I was in detention. I was</p> <p>5 only a child and didn't know what to do and was too</p> <p>6 scared and nervous to speak to anyone.</p> <p>7 "As far as I can recall, I did not make any</p> <p>8 complaints about the way that other detainees were being</p> <p>9 treated when I was at Brook House. I did not go to the</p> <p>10 police with my concerns or to anyone else. In reality,</p> <p>11 no-one informed me there was a complaints procedure.</p> <p>12 When I went to the welfare department, I informed them</p> <p>13 I was under 18 years old and I should not be in</p> <p>14 detention. However, as far as I can recall, they never</p> <p>15 informed me of a complaints procedure."</p> <p>16 I'm going to read a summary of paragraph 73 as</p> <p>17 follows.</p> <p>18 Following a judicial review brought by D2033, it was</p> <p>19 determined that his removal to Germany had been</p> <p>20 unlawful. He has received no apology about his</p> <p>21 detention or removal and says, "That makes me feel that</p> <p>22 I don't count for anything and they don't care that</p> <p>23 I suffered these things".</p> <p>24 D2033 then provides a statement of truth and the</p> <p>25 statement is signed and dated 18 November 2021, and</p> <p style="text-align: center;">Page 138</p>	<p>1 this statement other events which are relevant to the</p> <p>2 circumstances in which I was detained there and to my</p> <p>3 experience in Brook House. Because of the COVID-19</p> <p>4 pandemic restrictions, I prepared this statement with my</p> <p>5 solicitor over the course of several conferences which</p> <p>6 have taken place via Zoom and telephone.</p> <p>7 "I was detained at Brook House more than four years</p> <p>8 ago, between 31 March and 17 April 2017, and 20 April</p> <p>9 and 22 April 2017 for a total of 19 days. It felt like</p> <p>10 I was there for a lot longer and I found my time in</p> <p>11 detention very difficult. I find it painful and at</p> <p>12 times difficult to remember the events there because of</p> <p>13 it. Since being released from detention, I have been</p> <p>14 diagnosed with depression and PTSD and I continue to</p> <p>15 suffer from mental health symptoms.</p> <p>16 I sometimes become too distressed to continue to</p> <p>17 speak or reflect on the events I witnessed and</p> <p>18 experienced in detention. For the same reason, I am</p> <p>19 also not always able to date these events. I have,</p> <p>20 however, tried to describe these and my overall</p> <p>21 experience of Brook House to the best of my knowledge to</p> <p>22 assist the inquiry.</p> <p>23 My solicitors have told me that they have submitted</p> <p>24 the inquiry bundle of documents related to my detention</p> <p>25 together with a chronology of events they have prepared</p> <p style="text-align: center;">Page 140</p>

<p>1 and a list of key issues arising from my time at 2 Brook House in particular. I would ask that this 3 statement be considered together with these documents 4 which I hope will help the inquiry to understand my 5 experience at Brook House."</p> <p>6 Chair, I then summarise paragraphs 3 through to 16 7 as follows.</p> <p>8 D1713 provides some detail about his background. He 9 says that, as a child growing up in Nigeria, he was 10 sexually abused, physically mistreated and forced into 11 labour exploitation. He says that he was also violently 12 attacked in Nigeria because of his sexuality. He goes 13 on to explain the circumstances of his arrival in the 14 UK, his arrest by the police on 31 March 2017 and his 15 detention at Brook House later that night.</p> <p>16 He says he felt depressed and suicidal on his 17 transfer to Brook House.</p> <p>18 Chair, returning, then, to paragraph 17 of his 19 statement:</p> <p>20 "I arrived at Brook House late at night. I just 21 felt scared. I was led by officers to a waiting room 22 area. As I was waiting there, I saw a young man whom 23 I believe was of Indian origin, and had been sitting 24 quietly in the waiting area when I arrived, being 25 approached by several detention officers. I do not</p> <p style="text-align: center;">Page 141</p>	<p>1 questions about my mental health during this appointment 2 or how I was feeling at the time. I have considered 3 document <CJS007130> as requested by the inquiry. The 4 document indicates that between 03:35 am and 03:56 am on 5 1 April 2017, I was held in room 4A in the CSU, which 6 I understand to be the segregation unit. I am not sure 7 where in the centre I was, but in the early hours of 8 1 April 2017, I remained in what I would describe as 9 a waiting area with other detainees and staff rather 10 than a room or cell with beds until I was seen by the 11 nurse. I do not remember ever staying in the CSU at 12 Brook House.</p> <p>13 "After the assessment by the nurse, I was taken to 14 a room or cell. It felt more like a cell. There was 15 a bunk bed and another bed on the side. The toilet was 16 inside the room separated by a partition or wall but 17 with no door or curtain to protect the person in the 18 toilet from view. I cannot remember which wing I was 19 placed on, but I recall that the room was on the ground 20 floor. I have since seen an entry in my medical 21 records, dated 7 April 2017 at 19:28, which suggests 22 that I was on C wing. I also cannot remember the room 23 number, but I have now seen document <CJS007130> which 24 indicates that I stayed in room number 19 on C wing from 25 1 to 17 April 2017. There were two other people sharing</p> <p style="text-align: center;">Page 143</p>
<p>1 remember how many officers there were, but it was more 2 than two.</p> <p>3 "I heard the officers telling the man that he would 4 be taken away and then proceeding to hold his arms and 5 handcuff them behind his back, despite the fact that he 6 had not been posing any resistance to the officers. 7 Witnessing this made me feel even more scared and 8 I feared that I could be handcuffed and taken away at 9 any time to be removed to Nigeria.</p> <p>10 "I remained seated in the waiting area for what felt 11 like hours. I was then seen by a nurse. My medical 12 records from Brook House, which I have since seen, 13 suggest that my examination took place at around 5.23 in 14 the morning of 1 April 2017. I cannot recall exactly 15 when the appointment took place, but I remember it being 16 very late and in the early hours of the morning. I felt 17 tired and confused. The nurse asked me some general 18 questions about my health and history. She did not ask 19 me whether I was a victim of torture or had been 20 tortured in the past. I have now seen that the nurse's 21 entry in my medical records states that I declined an 22 appointment with a doctor. I was not asked whether 23 I wanted to see a doctor. If I had been asked if 24 I wanted to see a doctor, I would have said that I did. 25 "I also do not recall being asked any specific</p> <p style="text-align: center;">Page 142</p>	<p>1 my cell. I believe one was a Ghanaian man [and the name 2 is redacted]. I think he was a little bit older than 3 I was at the time, in his late 20s or early 30s. My 4 other roommate was a man from Grenada who called himself 5 [and again the name is redacted].</p> <p>6 "I was not provided with an induction at 7 Brook House. I was not interviewed by any officer upon 8 arrival or given a tour of the detention centre 9 building. I also did not have contact with the detainee 10 welfare officer while I was at Brook House and was not 11 informed of my rights as a detainee. I was not aware 12 that an induction process was, or should have been, in 13 place at Brook House or that there was a welfare office 14 there.</p> <p>15 "After I was taken to the cell on 1 April 2017, the 16 door was locked. I felt desperate and petrified. 17 I could not sleep or eat and I remember sitting on the 18 floor of the room not knowing what to do. It was dark. 19 I started having hot flashes and flashbacks to events in 20 my childhood and mistreatment I had suffered, including 21 being attacked and physically abused. I felt really low 22 and started to have thoughts about hurting myself, which 23 scared me.</p> <p>24 I felt claustrophobic being locked in a cell. It 25 also felt humiliating that we would be locked up all</p> <p style="text-align: center;">Page 144</p>

1 night until someone came to release us in the morning,
 2 like animals. When the cell door was unlocked later in
 3 the morning on 1 April 2017, I came out of the cell and
 4 sat on the floor in the corridor. I remained there for
 5 what felt like a long time. Eventually, I asked another
 6 detainee how I could get to see a doctor and he told me
 7 I would need to go to healthcare. I then went to
 8 healthcare and I asked a nurse if I could see a doctor
 9 because I was feeling really unwell and continued to
 10 have hot flashes and flashbacks.

11 "Later that morning, I was seen by a doctor, whom
 12 I now know to be Dr Saeed Chaudhary from the medical
 13 records that I have since been shown. I told
 14 Dr Chaudhary that I was having flashbacks and that I had
 15 scars on my face and on my back and that I had been
 16 mistreated in the past. I also told him that I could
 17 not eat. I said that I was scared and I would harm
 18 myself. I felt, throughout the appointment, that
 19 Dr Chaudhary was not fully paying attention to me or at
 20 least he did not ask me many questions about my physical
 21 or mental health. He did not ask me whether I had been
 22 tortured or ask to see my scars or to explain how I had
 23 sustained them. He prescribed me sertraline, which
 24 I understand is an antidepressant, and I felt in part
 25 that that was just a way to deal with me quickly.

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1 me or ask how I was.

2 "I have now seen documents relating to the level of
 3 ACDT observations that I was on in April 2017. These
 4 records appear to be extracts of shift handover notes
 5 for the staff. I have not yet seen my full ACDT
 6 records, although I understand that my current
 7 solicitors have asked for these to be disclosed. The
 8 ACDT references that I have seen in the handover notes
 9 do not reflect the level of observations that I actually
 10 received. Document <CJS0072752> states that, on
 11 5 April 2017, I was supposed to be observed hourly, and
 12 that staff should have at least two conversations with
 13 me per day. Document <CJS0072752> suggests that, on
 14 6 April 2017, I was to be observed every two hours
 15 during the night and again to have 'two good quality
 16 cons a day' with staff.

17 "I remember the checks being far less frequent than
 18 these recorded levels. The staff at Brook House never
 19 approached me to ask me any questions about my problems
 20 or my mental health unless I was attending an
 21 appointment with the mental health nurse. When they
 22 came to observe me, they just checked that I was in the
 23 cell.

24 Sometimes, when a member of staff came to check,
 25 I would try and have a conversation with them. I tried

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1 "That same day, I was then seen by a mental health
 2 nurse. I do not remember exactly what happened during
 3 the appointment, as I had several ones during my time at
 4 Brook House, and I find it difficult not to confuse some
 5 of the things that happened during each of them.

6 "However, I remember that in this first appointment
 7 I told the nurse that I had been abused and attacked in
 8 Nigeria. From the medical records that I have since
 9 read, I can see that I also showed the nurse the scars
 10 I sustained and told her that I was suffering from
 11 flashbacks. I do not recall the nurse asking me
 12 questions about my scars or whether I was a victim of
 13 torture. I continued to have thoughts of harming
 14 myself. I also have not been able to eat since I had
 15 entered Brook House because I felt so scared and unwell.
 16 I now know, having viewed the documents with the help of
 17 my solicitors, that later that day I was put on an ACDT
 18 document with hourly observations. I did not know what
 19 an ACDT was at the time, but I understood that someone
 20 was supposed to come to check regularly that I had not
 21 harmed myself. The people who came to do the checks
 22 were G4S officers and not healthcare staff. They just
 23 knocked on my cell door and looked through the
 24 observation panel instead of entering the room. They
 25 checked that I was in the room but they did not speak to

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1 to open up and discuss my problems with them. But I did
 2 not feel listened to or supported when I did so.

3 "Early on in my detention, I spoke to my roommate
 4 [whose name is redacted], and told him that I was scared
 5 I would be sent back to Nigeria and killed. He told me
 6 that there was something called asylum that I could make
 7 a claim for. That was the first time I learned about
 8 the asylum process. I also remember a nurse telling me
 9 what asylum was on the same day.

10 "I believe [and, again, this is a reference to the
 11 roommate whose name is redacted] then explained what
 12 I needed to do to submit my claim to the Home Office.
 13 I cannot remember exactly what I did, but after speaking
 14 to him, I sent a letter to the Home Office explaining
 15 that I wanted to claim asylum. I did not have legal
 16 representation at the time. I did not send a copy of
 17 the letter to anyone else. I have now had sight of that
 18 letter dated 1 April 2017. In that letter, I also
 19 stated that I felt depressed and suicidal, that I had
 20 lost my appetite and was suffering from flashbacks.

21 "During the first few days in detention, I saw
 22 a mental health nurse on several occasions. The medical
 23 records indicate that I saw this nurse for review on
 24 2 and 3 April 2017. I remember that I told her that
 25 I still could not eat as I felt stressed and scared.

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37 (Pages 145 to 148)

<p>1 The first day in detention I could not eat at all.</p> <p>2 I then kept having difficulties eating for several days.</p> <p>3 Sometimes I did not go to collect my meal at all and</p> <p>4 other times I went to collect it but then I was not able</p> <p>5 to eat much of it. The food tasted horrible and I felt</p> <p>6 so depressed that I had no appetite to eat.</p> <p>7 "No-one came to check whether or not I had eaten.</p> <p>8 I have not seen any records of my food refusal or not</p> <p>9 collecting a meal, although I understand my solicitors</p> <p>10 have requested disclosure of any records of this.</p> <p>11 "I started suffering from migraines and crying</p> <p>12 a lot. The mornings were always the worst part of</p> <p>13 the day. I also developed diarrhoea. I saw a doctor</p> <p>14 and was given some medication for it. Around this time,</p> <p>15 during one of the reviews with the mental health nurse,</p> <p>16 I told her that I struggled with being locked up in my</p> <p>17 room. I remember that I felt claustrophobic and</p> <p>18 suffered from flashbacks, particularly of the abuse in</p> <p>19 my childhood. The cell was always dark and I felt</p> <p>20 depressed. At the same time, I felt so unwell that</p> <p>21 I was unable to spend much time outside of the cell and</p> <p>22 off the wing corridor. I think I spent on average</p> <p>23 approximately 21 hours in the cell and three hours</p> <p>24 outside the cell on any given day. I was practically</p> <p>25 always in my cell as I felt there was nothing to leave</p> <p style="text-align: center;">Page 149</p>	<p>1 "I have read the entry in my medical records dated</p> <p>2 10 April 2017 at 14:46 referring to a further review</p> <p>3 which I had with a mental health nurse. I note that the</p> <p>4 nurse recorded that I appeared 'cheerful and talkative'</p> <p>5 and that she recorded that I was finding comfort in the</p> <p>6 church. In the days preceding this appointment, I had</p> <p>7 claimed asylum and that had given me a small hope that</p> <p>8 I would not be removed to Nigeria.</p> <p>9 "I had also met [again, the name is redacted] the</p> <p>10 detainee who was involved in running the prayer services</p> <p>11 at Brook House who helped me to concentrate on that</p> <p>12 small hope. Attending the prayer services had given me</p> <p>13 some slight comfort. Despite this, however, I was still</p> <p>14 feeling mentally very unwell. Every time I returned to</p> <p>15 my cell, I felt claustrophobic and continued to have</p> <p>16 flashbacks. I had flashbacks throughout my time in</p> <p>17 detention. This last mental health review on</p> <p>18 10 April 2017 was brief, and I did not feel I was given</p> <p>19 the time and space to explain how I actually felt.</p> <p>20 After the review, I was not given any further</p> <p>21 appointments with the mental health team. Some days</p> <p>22 later, I asked a G4S officer whether I could be seen</p> <p>23 again by a mental health nurse. I cannot remember what</p> <p>24 the officer told me, but it was not a concrete answer</p> <p>25 and I did not receive a further appointment. I did not</p> <p style="text-align: center;">Page 151</p>
<p>1 it for and I was too unwell to be around other people.</p> <p>2 I did not go to the library or take part in any</p> <p>3 educational courses. Many of the spaces that detainees</p> <p>4 were allowed in felt very confined. I only left my cell</p> <p>5 to watch the other detainees play football or to attend</p> <p>6 evening prayers. The evening prayers were organised by</p> <p>7 another detainee -- a Nigerian man known to me as D3704,</p> <p>8 organised a multi-faith service every evening before</p> <p>9 lock-up. He was Christian and preached from the Bible</p> <p>10 but detainees of all religions were welcome to attend.</p> <p>11 I felt safe at evening prayer, it was the only time of</p> <p>12 day at Brook House that I felt okay and ever felt any</p> <p>13 hope.</p> <p>14 "I remember being asked by the mental health nurse</p> <p>15 whether I had been sexually abused in the past. I could</p> <p>16 not explain what I had gone through and still find it</p> <p>17 extremely difficult to talk about it. From the medical</p> <p>18 records I have now seen, it looks like this discussion</p> <p>19 took place during an appointment on 8 April 2017. I was</p> <p>20 still on ACDT observations at the time, but they were</p> <p>21 less frequent and happened only after I had been locked</p> <p>22 up at night. When I had observations, it was still the</p> <p>23 same as before. They were carried out by an officer who</p> <p>24 just checked whether I was in the room. I felt that</p> <p>25 no-one cared how I was.</p> <p style="text-align: center;">Page 150</p>	<p>1 have any further contact with anyone from the</p> <p>2 Brook House mental health team after this point, even</p> <p>3 though I continued to feel unwell and suffered from</p> <p>4 flashbacks and nightmares.</p> <p>5 "Following the mental health review on</p> <p>6 10 April 2017, staff stopped coming to check on me when</p> <p>7 I was in my cell. Nobody explained to me that I was</p> <p>8 being taken off observations at that point. I never</p> <p>9 signed a form or was asked to provide any comments on</p> <p>10 the closing of my ACDT plan. Having since seen the</p> <p>11 observation records in the handover notes from that</p> <p>12 time, I understand that my ACDT plan was closed on</p> <p>13 11 April 2017. This was not communicated to me at the</p> <p>14 time.</p> <p>15 "When I next went to collect my anti-depressant</p> <p>16 medication, a nurse told me it was finished and that</p> <p>17 I did not have a further prescription. I have now seen</p> <p>18 an entry in my medical records, dated 15 April 2017 at</p> <p>19 19:50, which states that I had finished my sertraline</p> <p>20 tablets. The entry states that I refused to make</p> <p>21 another appointment with the doctor to renew my</p> <p>22 subscription as the tablets were making me sleepy. I do</p> <p>23 not recall being offered an appointment with the doctor</p> <p>24 to renew my prescription. If I had been offered an</p> <p>25 appointment, I believe I would have accepted. I still</p> <p style="text-align: center;">Page 152</p>

<p>1 felt unwell and depressed at the time, particularly when</p> <p>2 I was in my cell, and I felt that the medication was at</p> <p>3 least helping me to sleep.</p> <p>4 "Whilst I was at Brook House, I was threatened by</p> <p>5 staff and treated in a way that was often degrading and</p> <p>6 at times outright abusive and offensive. One night,</p> <p>7 a female officer came to lock my cell. I was struggling</p> <p>8 mentally and, as I have explained, I found the time when</p> <p>9 the cell was locked at night really difficult and</p> <p>10 triggering of my flashbacks. I asked her whether she</p> <p>11 would lock up a dog like she was locking myself and</p> <p>12 other detainees up every night. She responded with</p> <p>13 words to the effect of, 'I would never lock up my dog,</p> <p>14 but I would lock you up'. I was shocked. I did not</p> <p>15 know who to report the incident to or how to make</p> <p>16 a complaint.</p> <p>17 "I felt humiliated and scared. I felt like I was</p> <p>18 not being seen or treated as a human being. I do not</p> <p>19 remember the officer's name but I believe she was</p> <p>20 a white or mixed-race woman. She was of large build</p> <p>21 with dark hair and looked like she was in her 20s.</p> <p>22 I believed that what I was told by the officer had</p> <p>23 racial undertones. While the way all detainees at</p> <p>24 Brook House were treated was inhumane, I often felt that</p> <p>25 the way officers spoke to and acted around detainees of</p> <p style="text-align: center;">Page 153</p>	<p>1 attend the scene.</p> <p>2 "He seemed to have authority and carried himself in</p> <p>3 a commanding manner. The other detainees and I were all</p> <p>4 scared and did not know what to do. We ended up</p> <p>5 returning to our rooms and being locked up like every</p> <p>6 other night. There was no follow-up after the protest</p> <p>7 and we did not really get a chance to discuss what had</p> <p>8 happened, even amongst ourselves, because we were locked</p> <p>9 up immediately.</p> <p>10 "I was never physically abused at Brook House but</p> <p>11 I saw other people, who were vulnerable and often</p> <p>12 self-harming, being physically mistreated and</p> <p>13 manhandled. On one occasion, I was standing outside my</p> <p>14 room door on the ground floor when I saw an Iranian</p> <p>15 detainee on my wing -- which as mentioned above I</p> <p>16 understand to have been C wing -- walking towards the</p> <p>17 door opening onto a corridor which led to the outdoor</p> <p>18 yard. As he walked towards the door, I heard him</p> <p>19 mumbling words to the effect of, 'I want to go, I want</p> <p>20 to get a ticket'. He looked distressed. When he</p> <p>21 reached the door, he started banging his head on the</p> <p>22 glass panel that formed part of it. I was quite far</p> <p>23 from him, so I am not sure whether the glass smashed,</p> <p>24 but the banging was loud and I could see that he was</p> <p>25 hitting the door with force. Officers then came out of</p> <p style="text-align: center;">Page 155</p>
<p>1 black, African and Middle Eastern origin, including</p> <p>2 myself, was often even ruder and more aggressive than</p> <p>3 with others.</p> <p>4 "I remember that one day there was a protest which</p> <p>5 many of the detainees at Brook House took part in</p> <p>6 because of our conditions of detention. It was getting</p> <p>7 close to the evening lock-up time and some of us,</p> <p>8 including myself, had not gone into our rooms. I think</p> <p>9 almost every detainee on my wing, C wing, took part in</p> <p>10 the protest. It was a form of protest against how we</p> <p>11 were being treated every day, both in terms of</p> <p>12 the conditions in the centre and the way many detainees</p> <p>13 were mistreated and manhandled by officers.</p> <p>14 "We just stood outside our rooms peacefully.</p> <p>15 Eventually, a man whom I believe to have been a G4S</p> <p>16 senior manager, came to the wing and told us that if we</p> <p>17 didn't go back to our rooms by 9.00 pm and allow the</p> <p>18 lock-up to take place, we would be taken to the block,</p> <p>19 which we knew to be the segregation unit. This man was</p> <p>20 white, of average height and had grey spiky hair. He</p> <p>21 was wearing a G4S uniform. He looked as though he was</p> <p>22 in his mid 40s at the time. I had seen him around</p> <p>23 Brook House prior to the protest. I believe he was</p> <p>24 a senior manager because whenever a serious incident</p> <p>25 occurred, he was called up by other staff members to</p> <p style="text-align: center;">Page 154</p>	<p>1 the office, which was near the door, and took the</p> <p>2 detainee away by force. I believe it was four or five</p> <p>3 of them who surrounded him.</p> <p>4 "The officers shouted at him and other detainees to</p> <p>5 move back and it was difficult for me to properly see</p> <p>6 how they were holding the detainee who had banged his</p> <p>7 head on the glass, but they were clearly using force to</p> <p>8 take him away. I heard from others that he was taken to</p> <p>9 the block after the incident. We were always scared of</p> <p>10 being taken there. If there was an incident, even if it</p> <p>11 involved a detainee causing harm to themselves, you were</p> <p>12 just taken there. It never happened to me, but I heard</p> <p>13 it did to others.</p> <p>14 "On another occasion, I saw a young detainee,</p> <p>15 I believe he was white European, entering the wing</p> <p>16 holding his mattress and a duvet. He placed the bedding</p> <p>17 on the floor of the corridor across from my room. I was</p> <p>18 standing just outside my room. The detainee looked</p> <p>19 unkempt and distressed. I heard him say words to the</p> <p>20 effect of, 'Kill me. I am going to die'. Soon after,</p> <p>21 several officers approached him and surrounded him.</p> <p>22 I cannot remember how many officers were there, but it</p> <p>23 was more than two and they took the detainee away from</p> <p>24 the wing by force. They surrounded the detainee so,</p> <p>25 again, it was difficult to see, but from the way they</p> <p style="text-align: center;">Page 156</p>

<p>1 were moving, it was clear that they were using force on</p> <p>2 him. As far as I was able to see, the detainee was not</p> <p>3 resisting.</p> <p>4 "I also witnessed a third incident when a detainee</p> <p>5 self-harmed by cutting his hand or wrist with a sharp</p> <p>6 object while many of us were queuing in the canteen</p> <p>7 area. I was about 2 metres away from him, to his side.</p> <p>8 There was an officer in charge of distributing the food</p> <p>9 and one standing behind the canteen queue. I heard the</p> <p>10 detainee repeatedly asking the officer in charge of</p> <p>11 distributing the food to take him to healthcare because</p> <p>12 he felt unwell and needed his antidepressants, but the</p> <p>13 officer just ignored him and did not attend to him.</p> <p>14 "The detainee repeated several times that he needed</p> <p>15 his antidepressant medication but the officer did not</p> <p>16 reply to him. The detainee then cut himself with</p> <p>17 something sharp that he was holding in one of his hands.</p> <p>18 I'm not sure what it was, but there was a lot of blood.</p> <p>19 It was only once he'd cut himself and started bleeding</p> <p>20 heavily that a number of officers attended and took him</p> <p>21 away.</p> <p>22 "I think the officers came out of their office on</p> <p>23 the wing. There were more than two of them. I do not</p> <p>24 know where he was taken, but I remember him coming back</p> <p>25 to the wing later that day with his hand bandaged.</p> <p style="text-align: center;">Page 157</p>	<p>1 I could report this to anyone as I was scared of what</p> <p>2 could happen to me or him if I reported it. We were</p> <p>3 scared to call the officers when someone was under the</p> <p>4 influence of spice because we did not know what would</p> <p>5 happen and people thought they would not provide medical</p> <p>6 help but would instead punish the detainee who was under</p> <p>7 the influence.</p> <p>8 "I never saw this happening directly myself, but</p> <p>9 I heard from others that it did and that sometimes</p> <p>10 people were taken to the block when found under the</p> <p>11 influence. For someone to be under the influence of</p> <p>12 spice was, of course, dangerous, but I did not fully</p> <p>13 understand what it could do to you at the time. And we</p> <p>14 were more scared of the treatment we may be subjected to</p> <p>15 by the officers if we reported the incidents.</p> <p>16 "I never saw any rehabilitative support being given</p> <p>17 or available to the detainees who used drugs at</p> <p>18 Brook House.</p> <p>19 "I witnessed other detainees under the influence of</p> <p>20 drugs. There was a Moroccan man I played football with</p> <p>21 sometimes in the yard, whom I once saw sleeping on the</p> <p>22 floor of his room. I was walking past his room to do my</p> <p>23 laundry. I believe he was under the influence of drugs</p> <p>24 at the time as that type of behaviour was completely out</p> <p>25 of character for him. Again, I did not report this, as</p> <p style="text-align: center;">Page 159</p>
<p>1 I never complained of or reported these incidents.</p> <p>2 I did not know who to complain to and I was scared that</p> <p>3 officers may target me if I did complain and that I may</p> <p>4 be taken to the block. I asked my roommates how to make</p> <p>5 a complaint. They told me that there was no system of</p> <p>6 oversight at Brook House and no safe place in which to</p> <p>7 report a member of staff who had crossed the line.</p> <p>8 I did not see any other detainee making a complaint nor</p> <p>9 did I hear any specific accounts of someone who had</p> <p>10 complained. We were all scared of the consequences of</p> <p>11 speaking out in that environment. We were living in</p> <p>12 fear. Brook House was like hell.</p> <p>13 "I also did not think that anyone would listen to me</p> <p>14 if I reported these incidents or that anything would</p> <p>15 change because they happened so often and so many</p> <p>16 officers were involved.</p> <p>17 "I witnessed other detainees under the influence of</p> <p>18 drugs whilst I was at Brook House. I do not know where</p> <p>19 these detainees got the drugs from. One of my roommates</p> <p>20 was addicted to spice and smoked it in the room.</p> <p>21 I never smoked this myself but I was scared of</p> <p>22 the secondary effect that the smoke would have on me.</p> <p>23 I worried about my roommate, as he often looked</p> <p>24 unwell -- as if he was coming in and out of</p> <p>25 consciousness -- after taking spice. I did not feel</p> <p style="text-align: center;">Page 158</p>	<p>1 I was scared and I did not know what would happen if</p> <p>2 I did. I also once witnessed a young Somali man,</p> <p>3 I think he was 19 or 20 years old, sitting on a chair in</p> <p>4 his room with saliva coming out of his mouth. He was</p> <p>5 dribbling and clearly unwell. I only stopped briefly in</p> <p>6 front of his door. There were other detainees there.</p> <p>7 I then walked on, for the same reason I described above.</p> <p>8 "At times, I felt I was at risk of being harmed by</p> <p>9 other detainees because of my sexuality whilst I was at</p> <p>10 Brook House. Towards the beginning of my detention, in</p> <p>11 the first week or so, other men in the centre started</p> <p>12 making sexual advances towards me. I believe some of</p> <p>13 them knew I was bisexual. I felt that the advances</p> <p>14 were, in fact, a kind of mockery as well as a threat.</p> <p>15 I was scared that they would harm me. I did not want</p> <p>16 anyone else to find out about my sexuality because I was</p> <p>17 scared of being mistreated or attacked.</p> <p>18 "I told a mental health nurse during one of my</p> <p>19 appointments, which I know to have been the review which</p> <p>20 took place on 8 April 2017, on the basis of the records</p> <p>21 I have seen, that other detainees were making sexual</p> <p>22 advances towards me and that I was not comfortable with</p> <p>23 it. The nurse also recorded that I said that this was</p> <p>24 because I was not gay. I do not remember saying this.</p> <p>25 But I know that I was trying to hide my sexuality at the</p> <p style="text-align: center;">Page 160</p>

<p>1 time. I did not trust anyone. I felt that I needed to</p> <p>2 protect myself. I did not know what else to do about</p> <p>3 the detainees making advances towards me. I just</p> <p>4 started to ignore them and eventually they stopped.</p> <p>5 "I did not speak to the detention officers or</p> <p>6 healthcare staff about this again. I did not feel that</p> <p>7 anyone would help, and I was scared that some members of</p> <p>8 staff may be homophobic and that I would not be safe</p> <p>9 because of the way we were being treated generally at</p> <p>10 Brook House and on the basis of my past experiences in</p> <p>11 Nigeria.</p> <p>12 "During my period of detention at Brook House, I did</p> <p>13 not visit the welfare office. I was not told that such</p> <p>14 an office existed at the detention centre. I was not</p> <p>15 aware of what the PSU, IMB or PPO were, although my</p> <p>16 solicitor has now explained these acronyms to me. I was</p> <p>17 not in contact with any charities whilst at Brook House</p> <p>18 and at that stage had not heard of GDWG or</p> <p>19 Medical Justice.</p> <p>20 "I only received support from Medical Justice after</p> <p>21 I left Brook House and was transferred to Harmondsworth.</p> <p>22 I was not aware of any support services that I could</p> <p>23 access at Brook House, other than the evening prayer</p> <p>24 I attended which, as I mentioned, was organised by</p> <p>25 a fellow detainee. External pastors did come to</p> <p style="text-align: center;">Page 161</p>	<p>1 else to wear. I was cold and felt humiliated. I was</p> <p>2 transferred to Harmondsworth not long after in a van</p> <p>3 with other detainees and escort officers."</p> <p>4 Chair, I then summarise paragraphs 48 through to 49</p> <p>5 as follows.</p> <p>6 D1713 then gives an account of a screening</p> <p>7 appointment with a nurse at Harmondsworth in which he</p> <p>8 says that he reported he had been attacked in Nigeria</p> <p>9 and showed the nurse his scars. He says he does not</p> <p>10 recall being asked if he was a victim of torture or if</p> <p>11 he wanted to see a doctor for an initial assessment. He</p> <p>12 also states that, having reviewed the medical records,</p> <p>13 the nurse incorrectly recorded that he had not received</p> <p>14 any medication for mental health problems, despite</p> <p>15 having been prescribed antidepressant medication at</p> <p>16 Brook House. He does not recall being asked any</p> <p>17 questions about his mental health during this</p> <p>18 appointment, though he continued to feel unwell and</p> <p>19 suffered from ongoing flashbacks and nightmares.</p> <p>20 D1713 goes on to describe a nightmare he had during</p> <p>21 his first night at Harmondsworth about his experiences</p> <p>22 in Nigeria, which he informed the Home Office of.</p> <p>23 Returning, chair, to paragraph 50 of his witness</p> <p>24 statement:</p> <p>25 "A few days after, on or around 20 April 2017,</p> <p style="text-align: center;">Page 163</p>
<p>1 Brook House on Sundays, but I preferred to attend the</p> <p>2 detainee-run prayers.</p> <p>3 "While at Brook House, I had access to a basic cell</p> <p>4 phone on which calls could be made. However, I did not</p> <p>5 have credit on this phone for a long time and,</p> <p>6 therefore, could not use it to contact anyone. Nobody</p> <p>7 told me that I could have visitors at Brook House or</p> <p>8 explained to me how I could send a letter to my friends</p> <p>9 or family."</p> <p>10 Turning now to D1713's transfer between Brook House</p> <p>11 and Harmondsworth.</p> <p>12 "On 17 April 2017, I was in the laundry room washing</p> <p>13 my clothes. I was just wearing tracksuit bottoms and no</p> <p>14 top, as I had taken off my T-shirt to wash it. An</p> <p>15 officer entered the room and approached me. He told me</p> <p>16 that I was being transferred to Harmondsworth detention</p> <p>17 centre and that I had to get ready immediately. I did</p> <p>18 not understand why I was being transferred and the</p> <p>19 officer did not explain this to me. I explained to them</p> <p>20 that my clothes were all in the laundry and I had</p> <p>21 nothing dry to wear. The officer said that he did not</p> <p>22 care. His tone of voice was dismissive, and I felt that</p> <p>23 I had no choice. I took my clothes out of the laundry</p> <p>24 and returned to my room to pack them wet into my</p> <p>25 suitcase. I put on a wet T-shirt because I had nothing</p> <p style="text-align: center;">Page 162</p>	<p>1 officers came to see me -- I think I was in my room in</p> <p>2 the induction wing at the time -- and told me that I was</p> <p>3 being sent back to Brook House. They told me that I was</p> <p>4 being sent back there for my bail hearing. I felt</p> <p>5 confused and scared to be returned to Brook House</p> <p>6 because of how I had been treated there and what I had</p> <p>7 witnessed, but felt that I had no choice but to comply</p> <p>8 with the officers' orders.</p> <p>9 "After I arrived back at Brook House, I had</p> <p>10 a further screening appointment with a nurse. My</p> <p>11 memories of the screening appointments I had upon</p> <p>12 transfer to and from Harmondsworth sometimes overlap.</p> <p>13 However, I remember feeling like the nurse was not</p> <p>14 listening to me. I don't remember being asked at the</p> <p>15 second screening appointment at Brook House whether</p> <p>16 I was a victim of torture or whether I wished to have an</p> <p>17 appointment with the doctor.</p> <p>18 "I have seen the entry in my IRC medical records</p> <p>19 dated 20 April 2017 which states that I had 'no medical</p> <p>20 or mental health issues'. I consider this assessment to</p> <p>21 be plainly inaccurate. By that date, I had attended</p> <p>22 multiple mental health reviews at Brook House and had</p> <p>23 repeatedly told the doctors, nurses and detention centre</p> <p>24 staff that I felt depressed and was suffering from</p> <p>25 flashbacks from my previous mistreatment in Nigeria.</p> <p style="text-align: center;">Page 164</p>

<p>1 I do not know why my mental health issues were not 2 recorded in my medical records on that date. 3 "I was at Brook House during this second period for 4 only two days. I cannot remember what the number of my 5 cell was during that time, but I remember that the cell 6 was on the first floor. I have since considered 7 document <CJS007130>, which suggests that I was on 8 C wing in room number 2. The room had a similar layout 9 to my first cell at Brook House and the toilet was only 10 partially separated from the rest of the room. I shared 11 that room with one other person. I do not remember my 12 roommate's name, as I only stayed there for two nights. 13 "The Home Office records I have seen now confirm 14 that on 21 April 2017 my bail application was withdrawn. 15 I do not know the reason for this. I did not ask for 16 the application to be withdrawn and it was not explained 17 to me why the bail hearing didn't go ahead. 18 "I did not have any contact with the mental health 19 team during this second period at Brook House, even 20 though I continued to feel unwell and suffer from 21 flashbacks. I was not reviewed or asked any questions 22 about my history of torture, which I had reported to 23 healthcare during my first period of detention at 24 Brook House." 25 Chair, I then summarise paragraphs 54 through to 55</p> <p style="text-align: center;">Page 165</p>	<p>1 events in Nigeria and nightmares. I told the doctor 2 that I was distressed and that my mental health was not 3 in the right place, but he did not ask me to elaborate 4 on this. I did not feel that anyone cared or that 5 I would get any support. The doctor did not explain to 6 me the purpose of the appointment. 7 "I know now from the documents provided to me by my 8 solicitors that the above appointment on 6 May 2017 9 resulted in a rule 35(3) report being prepared for me. 10 I have now seen a copy of the report in which the 11 document summarises my account of torture and states 12 that the scars he observed on my body may be due to the 13 attack that I was subjected to in Nigeria. 14 "Although I agree with what the doctor recorded in 15 relation to my scars being due to the attack that 16 I suffered, I am surprised and upset that he did not 17 record anything about my mental health and the impact 18 that detention was having on me. 19 "I have also since learnt that the Home Office 20 responded to this report, accepting that my account met 21 the definition of torture, but deciding that I was to 22 remain in detention. I do not remember being provided 23 with this response at the time or having it explained to 24 me. 25 "I have reviewed a Home Office detention review</p> <p style="text-align: center;">Page 167</p>
<p>1 as follows. 2 D1713 was then transferred back to Harmondsworth on 3 22 April 2017. He states that the medical records 4 incorrectly record he declined his screening 5 appointment. He says he did not decline this 6 appointment; he simply struggled to understand why he 7 was being asked the same questions he had been asked 8 only a matter of days before, following his first 9 transfer to Harmondsworth, when nothing had changed in 10 his circumstances. 11 Resuming then, chair, at paragraph 56 of D1713's 12 statement: 13 "It was not until around five weeks after I was 14 first detained, on 6 May 2017 -- I know the precise date 15 from the records that I have seen -- that I had an 16 appointment with a doctor at Harmondsworth, where I was 17 asked questions for the first time about the torture 18 I had suffered in Nigeria. The appointment was brief, 19 and I did not feel I had enough time to properly explain 20 to the doctor what had happened to me. I showed him my 21 scars. He did not ask me whether I had any related 22 psychological symptoms or how I felt mentally whilst in 23 detention. 24 "I was still feeling really unwell. I felt 25 depressed and continued to have flashbacks of traumatic</p> <p style="text-align: center;">Page 166</p>	<p>1 dated 10 May 2017 which states that there was no 2 evidence from healthcare that detention was having 3 a detrimental impact on me. This document appears to 4 have been drafted on 10 May 2017, four days after my 5 rule 35(3) appointment. I do not understand how such 6 a conclusion could have been reached, given that I was 7 still suffering from serious mental ill-health and I had 8 explained my symptoms to healthcare on many occasions." 9 Chair, I then summarise paragraphs 59 through to 64 10 as follows. 11 D1713 then gives an account of his substantive 12 asylum interview in which he provided a detailed account 13 of his torture and past abuse. He says this led to him 14 being referred by the Home Office as a potential victim 15 of trafficking. He states that his asylum claim was 16 refused by the Home Office, though he appealed against 17 this decision. 18 D1713 states that he continued to struggle mentally 19 whilst at Harmondsworth. However, he did not receive 20 any mental health support during his several months' 21 detention there, nor was he prescribed any further 22 medication for his mental health issues. He explains he 23 contacted Medical Justice in around late June 2017, who 24 referred him to the Helen Bamber Foundation for 25 preparation of a medico-legal report.</p> <p style="text-align: center;">Page 168</p>

<p>1 D1713 was transferred to Colnbrook detention centre</p> <p>2 on 2 July 2017 and released the following day on bail.</p> <p>3 Following his release, he was diagnosed with PTSD in two</p> <p>4 separate medico-legal reports prepared by the</p> <p>5 Helen Bamber Foundation in 2018. In July 2019, his</p> <p>6 appeal against the Home Office's refusal of his asylum</p> <p>7 claim was allowed and he was granted refugee status.</p> <p>8 Returning finally, chair, to paragraph 65 of his</p> <p>9 witness statement:</p> <p>10 "I still struggle to remember my time in detention,</p> <p>11 and particularly at Brook House, but I am willing to</p> <p>12 assist the inquiry, to the extent that I am able, so</p> <p>13 that what happened to me and others does not happen</p> <p>14 again. I would, however, prefer to provide any further</p> <p>15 evidence in writing via my solicitors.</p> <p>16 "Detention has had a long-lasting effect on me and</p> <p>17 my mental health. I have struggled with symptoms of</p> <p>18 PTSD and depression since being released. I have</p> <p>19 frequent nightmares related to my time at Brook House</p> <p>20 and often feel very low. I easily feel scared if, for</p> <p>21 example, I hear a door banging, as it brings my mind</p> <p>22 back to the time I was in detention. I also suffer from</p> <p>23 flashbacks, which are both about my traumatic</p> <p>24 experiences in Nigeria and my time at Brook House.</p> <p>25 "I was recently assessed by a psychiatrist,</p> <p style="text-align: center;">Page 169</p>	<p>1 a two- or three-minute comfort break and then return</p> <p>2 shortly and finish off.</p> <p>3 THE CHAIR: That sounds like a good idea. Thank you. We</p> <p>4 will return in two or three minutes.</p> <p>5 (2.10 pm)</p> <p>6 (A short break)</p> <p>7 (2.15 pm)</p> <p>8 MS MOORE: The last piece of read evidence this afternoon</p> <p>9 relates to D1234.</p> <p>10 Reading in Evidence re D1234</p> <p>11 MS MOORE: D1234 was detained at Brook House in March</p> <p>12 and April 2017.</p> <p>13 He has not given an account of his experiences to</p> <p>14 the inquiry directly. However, on 25 April 2017, he</p> <p>15 made a written complaint to the Home Office about</p> <p>16 excessive force used by officers during his removal from</p> <p>17 Brook House to Stansted Airport on 28 March 2017. This</p> <p>18 complaint was copied to Harriet Harman QC MP, D1234's</p> <p>19 local MP. The Professional Standards Unit investigated</p> <p>20 the incident and produced a report dated 4 October 2017</p> <p>21 which we have at <HOM002750>. In terms of D1234's</p> <p>22 perspective, the investigation relied solely on the</p> <p>23 information in his written complaint as no contact</p> <p>24 information was available for him following his removal.</p> <p>25 In that written account, he explained what had</p> <p style="text-align: center;">Page 171</p>
<p>1 Dr Galappathie, who has prepared a report which</p> <p>2 I understand has been submitted to the inquiry by my</p> <p>3 solicitors. I also understand, from speaking to my</p> <p>4 solicitors, that Dr Galappathie is concerned about the</p> <p>5 deterioration in my mental health caused by my</p> <p>6 detention, including the development of my PTSD and</p> <p>7 depression, and that he considers that I should not give</p> <p>8 evidence to the inquiry other than in the form of</p> <p>9 a witness statement, as it would be too distressing for</p> <p>10 me. As I mentioned, I find it very difficult and</p> <p>11 triggering to talk about the events that I have</p> <p>12 described."</p> <p>13 D1713 then provides a statement of truth, chair, and</p> <p>14 that statement is then signed and dated 9 December 2021.</p> <p>15 Chair, that concludes the evidence to be read on</p> <p>16 behalf of D1713, and it just remains for me to thank</p> <p>17 both you and your team for allowing me the opportunity</p> <p>18 to read it on his behalf, which I know he is also</p> <p>19 grateful for.</p> <p>20 THE CHAIR: Thank you, Ms Profumo, and thank you to your</p> <p>21 client D1713 for providing the statement.</p> <p>22 MS MOORE: Chair, we have one last piece of read evidence</p> <p>23 this afternoon in relation to D1234. In total, with the</p> <p>24 video, it will be about 20 minutes. Before we hear that</p> <p>25 short summary and see the video, I suggest we might have</p> <p style="text-align: center;">Page 170</p>	<p>1 happened to him. He said that eight officers came into</p> <p>2 his cell on 28 March 2017. He said that two officers</p> <p>3 held his head and turned it violently to turn him around</p> <p>4 and that he felt a crack in his neck. He said he told</p> <p>5 officers this, but they took no notice. He said that</p> <p>6 then he was pushed and he hit his head on the floor. He</p> <p>7 said one officer held his throat and one officer stamped</p> <p>8 violently on his toes. He said that both of his wrists</p> <p>9 were handcuffed and the cuffs were cutting into his</p> <p>10 wrists. He said that his legs were grabbed, pushed</p> <p>11 upward from the feet and that this caused pain to his</p> <p>12 knees. D1234 said that both his legs were tied and a</p> <p>13 strap was applied over his stomach to strap him up, and</p> <p>14 this was applied over a lump in his stomach for which he</p> <p>15 was awaiting surgery.</p> <p>16 D1234 then said that he was thrown into a security</p> <p>17 van and driven naked to Stansted airport. D1234 said</p> <p>18 that he was screaming in pain, asking officers to stop</p> <p>19 and help him, but they refused and ignored him. He then</p> <p>20 said that he sustained injuries all over his body,</p> <p>21 bruises to his wrists, stomach and several other parts</p> <p>22 of his body. He said that he was returned to</p> <p>23 Brook House in a wheelchair, denied access to a doctor</p> <p>24 and only allowed to see a nurse.</p> <p>25 Enclosed within a letter to the Home Office from</p> <p style="text-align: center;">Page 172</p>

<p>1 Harriet Harman QC MP concerning D1234's complaint about 2 his treatment in Brook House was a handwritten statement 3 made by D1234 dated 12 May 2017. He provides therein 4 his account of what happened, which is consistent with 5 the earlier written complaint of 25 April 2017. I will 6 describe how he says he felt during this incident using 7 his own words. I quote: 8 "I was in extreme pain. I was screaming and asking 9 for help. I was ignored and completely helpless and 10 dehumanised. I thought I was going to die. I was 11 thrown into a security van and driven to Stansted 12 Airport naked. I was brought back to Brook House in 13 a wheelchair and thrown into a cell and locked up. The 14 cell was so cold that I was shivering. There was no 15 heating. I was extremely terrified. I thought that 16 I was going to die. I kept screaming that I was in 17 pain, but I was denied access to see a doctor. I was 18 told that I should go and treat myself when I get to 19 Nigeria. I am an innocent man and not a criminal, and 20 yet I have been subjected to the most extreme form of 21 violent and dehumanisation. My humanity, dignity and 22 sense of self-worth was stripped off. I am still having 23 pains and flashbacks. I can't sleep, and any time 24 I hear the jingle of keys or the steps of officers 25 I feel scared and unwell. I cannot walk properly, as</p> <p style="text-align: center;">Page 173</p>	<p>1 restraint techniques. They also said that D1234's 2 dignity was protected throughout by a sheet. 3 In their investigation report of 4 October 2017, the 4 PSU found the allegations unsubstantiated although 5 recommendations were made regarding training on control 6 and restraint techniques: on the use of handcuffs in 7 a supine position; head support; and the use of 8 controlling locks. 9 You will hear more, chair, about the accounts of 10 the officers and the PSU investigation in phase 2 of 11 the inquiry. 12 You will also hear, in phase 2, evidence from 13 Mr Jon Collier, who is the use of force expert 14 instructed by the inquiry, in relation specifically to 15 this incident. 16 Footage from this incident from a detention centre 17 officer's body-worn camera was retained and has been 18 provided to Jon Collier and to the inquiry, and a clip 19 of this incident can be played now. If we can play 20 disk 23 S1940003. 21 (Video played) 22 MR ALTMAN: Chair, that concludes all of the evidence in 23 this phase of the inquiry. Thank you. 24 THE CHAIR: Thank you, Mr Altman. 25</p> <p style="text-align: center;">Page 175</p>
<p>1 I drag one of my legs. I have pains and aches all over 2 my body." 3 That was from <HOM002492>. 4 His medical notes for that period, which are at 5 <HOM002492>, demonstrate that on the day of the incident 6 and for two days afterwards he complained to several 7 nurses, and then the following day, of pain all over his 8 body and difficulty breathing. When seen by Dr Hussein 9 Oozeerally, the doctor diagnosed him with a soft tissue 10 injury. 11 On 5 September 2017, a transfer of crime report was 12 sent to Sussex Police by the PSU via the Home Office, 13 which is at <HOM003398>, requesting that they be 14 notified if the police intend to begin a criminal 15 investigation. Sussex Police awaited the PSU's 16 investigation report, which we see from <SXP000030>. 17 The PSU considered the use of force forms completed 18 by G4S officers, and we have those at <HOM002496>, and 19 the interviews conducted by the PSU with DCOs named Dix, 20 Sayers, Murray, Olayie, as well as SDCOs Owen, Lawson, 21 Stevens, Jones and Hayes. The PSU also considered video 22 footage and an expert report from the National Tactical 23 Response Group which was commissioned by the PSU. 24 In short, the officers deny that they used excessive 25 force and say they were using approved control and</p> <p style="text-align: center;">Page 174</p>	<p>1 Closing remarks by THE CHAIR 2 THE CHAIR: So that concludes phase 1 of the inquiry 3 hearing. I would just like to say that I'm very 4 grateful to all the witnesses who have given evidence 5 before the inquiry over the past three weeks, and I am 6 especially grateful to those formerly detained persons 7 who have been able to give their evidence in person or 8 who have had their evidence read in. I, personally, am 9 very conscious of how challenging and difficult that has 10 been, and I acknowledge their courage in doing so 11 publicly. 12 I would also like to thank all of the core 13 participants and their legal representatives, as well as 14 the inquiry staff. I wish to thank the IDRC for hosting 15 us and RTS for their technical assistance, and of course 16 to Epiq and the transcribers. Thank you. 17 So the inquiry intends to resume phase 2 of 18 the hearing in the week commencing 21 February 2022. We 19 currently expect for those hearings to last up to 20 six weeks. The solicitor to the inquiry, I know, is 21 endeavouring to provide further information about 22 phase 2 as soon as possible. Having said that, I'm sure 23 you will all understand that we obviously will need to 24 be mindful of further Covid guidance or restrictions. 25 I remain very grateful for the high levels of</p> <p style="text-align: center;">Page 176</p>

1	engagement that there have been before and during the	
2	inquiry hearings, and I very much hope that that	
3	continues.	
4	I am expecting the inquiry to hear from a large	
5	number of witnesses in phase 2, and they are going to	
6	include several other formerly detained persons at	
7	Brook House, staff members, doctors, senior G4S managers	
8	and senior executives, Home Office officials, oversight	
9	bodies such as HMIP and the IMB, as well as corporate	
10	witnesses from the Home Office and from G4S. The	
11	inquiry will also be hearing from the three experts that	
12	I have instructed.	
13	I do recognise that there is a great deal of work to	
14	do between now and phase 2, and so I would like to thank	
15	you all in anticipation of that work.	
16	The only thing that remains for me to do is to wish	
17	you a healthy and relaxing, restful break when it comes.	
18	Thank you very much.	
19	(2.43 pm)	
20	(The inquiry was adjourned to	
21	the week commencing 21 February 2022)	
22		
23		
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