

<p>1 Monday, 6 December 2021</p> <p>2 (10.00 am)</p> <p>3 (Proceedings delayed)</p> <p>4 (11.05 am)</p> <p>5 THE CHAIR: Good morning. My apologies -- Monday morning</p> <p>6 gremlins, I think it's safe to say.</p> <p>7 MR ALTMAN: Chair, thank you. The next witness is D668.</p> <p>8 WITNESS D668 (sworn)</p> <p>9 THE CHAIR: Sir, perhaps I can just by just saying, you will</p> <p>10 understand why I won't be referring to you by your name,</p> <p>11 and my apologies if it seems rather impersonal, but</p> <p>12 I will just refer to you as "sir" throughout your</p> <p>13 evidence. Thank you.</p> <p>14 A. Thank you.</p> <p>15 Examination by MR ALTMAN</p> <p>16 MR ALTMAN: For the purposes of this inquiry, as the chair</p> <p>17 has just said, you are ciphered as D668. Can you</p> <p>18 confirm, please, that you have made a statement to the</p> <p>19 inquiry, you may remember, you signed and dated it</p> <p>20 22 November 2021, this year. Chair, that's <DL0000153>,</p> <p>21 to which there were two annexes <DL0000151>, annex 1,</p> <p>22 and <DL0000152>, annex 2. You also made a witness</p> <p>23 statement, you will recall, on 12 October 2017, so some</p> <p>24 years ago now. Chair, that's <HOM002543>. I'm going to</p> <p>25 ask that all of those documents be adduced in evidence</p> <p>Page 1</p>	<p>1 Q. -- before you came to this country. You also said that,</p> <p>2 although your asylum claims had been refused, and</p> <p>3 elements of your claim were not believed, the</p> <p>4 Home Office has always accepted, since determining your</p> <p>5 claim back in March 2009, that you were a member of an</p> <p>6 opposition party in the Ivory Coast and that you were</p> <p>7 arrested and detained on a number of occasions between</p> <p>8 2002 and 2006. Is that right?</p> <p>9 A. Correct.</p> <p>10 Q. You will remember that in June 2009, there was a court</p> <p>11 hearing in which the court dismissed your appeal against</p> <p>12 the Home Office refusal of your asylum claim; yes?</p> <p>13 A. Yes.</p> <p>14 Q. You made further submissions on human rights grounds to</p> <p>15 the Home Office, which, again, they refused?</p> <p>16 A. Yes.</p> <p>17 Q. In August 2010, there was a further court judgment in</p> <p>18 which your appeal was again dismissed. Do you remember</p> <p>19 that?</p> <p>20 A. Yes.</p> <p>21 Q. The following questions I'm about to ask you are asked</p> <p>22 on behalf of the Home Office. You understand I have to</p> <p>23 ask questions --</p> <p>24 A. Yes.</p> <p>25 Q. -- which the chair agrees for me to ask on behalf of</p> <p>Page 3</p>
<p>1 in totality.</p> <p>2 THE CHAIR: Agreed. Thank you very much.</p> <p>3 MR ALTMAN: As I say, you have made several witness</p> <p>4 statements. What I want to try to avoid, because there</p> <p>5 are four of them, is to go between them, because,</p> <p>6 otherwise, we will get bogged down in just looking at</p> <p>7 different paragraphs of different statements. If you</p> <p>8 need to refer to any statement to refresh your memory at</p> <p>9 any time, let me know, but let's see how your memory is</p> <p>10 and, if needs be, if I think you're struggling, I'll</p> <p>11 take you to a paragraph of a witness statement. All</p> <p>12 right?</p> <p>13 A. All right.</p> <p>14 Q. First of all, you will confirm that you are an asylum</p> <p>15 seeker from the Ivory Coast?</p> <p>16 A. Correct.</p> <p>17 Q. Is that right? Your language is French, but you speak</p> <p>18 English very well, and you understand English; is that</p> <p>19 right?</p> <p>20 A. Correct.</p> <p>21 Q. I want to ask you immediately about something that you</p> <p>22 say in your witness statement to the inquiry, and, just</p> <p>23 for the record, that's at paragraph 3. You say that you</p> <p>24 were tortured and mistreated in your home country --</p> <p>25 A. Correct.</p> <p>Page 2</p>	<p>1 other core participants, the Home Office being one of</p> <p>2 them?</p> <p>3 These are the questions. First of all, will you</p> <p>4 confirm that in the judgment of the court, which is the</p> <p>5 First-tier Tribunal, of 12 June 2009, the judge ruled</p> <p>6 that what you had said about being persecuted in your</p> <p>7 home country wasn't believable. Do you remember that's</p> <p>8 what the judge said? It wasn't credible?</p> <p>9 A. Yes.</p> <p>10 Q. Will you confirm that in the First-tier Tribunal</p> <p>11 judgment -- again, this time in August 2010 -- the judge</p> <p>12 said that the evidence you provided showed, in effect,</p> <p>13 that your claim was false, your claim to persecution was</p> <p>14 false. Do you remember that?</p> <p>15 A. Yes.</p> <p>16 Q. The question I ask you arising out of those two</p> <p>17 questions is, do you accept what those judges found</p> <p>18 against you, that your claimed persecution and torture</p> <p>19 were false?</p> <p>20 A. No.</p> <p>21 Q. I'm going to ask you some extra questions which I have</p> <p>22 been asked this morning --</p> <p>23 THE CHAIR: Sir, yes?</p> <p>24 A. I want to add something, if I can. In 2010, I was my</p> <p>25 own --</p> <p>Page 4</p>

1 MR ALTMAN: You wait for me to ask the questions, then you
 2 can answer.
 3 **A. Okay. Okay, thanks.**
 4 Q. That's why I'm about to ask questions which we were only
 5 asked to ask you this morning. So you just be patient
 6 with me and answer the questions.
 7 The first question is the very one that you were
 8 about to answer for yourself, that at the time of your
 9 appeal in 2010, first of all, there was no medical
 10 evidence put before the court; is that right?
 11 **A. Yes, that's correct.**
 12 Q. Secondly, you were unrepresented?
 13 **A. Correct.**
 14 Q. And you can confirm, and we will look at this later,
 15 that on 24 July 2017, Dr Chaudhary at Brook House
 16 carried out a medical examination on you -- do you
 17 remember?
 18 **A. Yes.**
 19 Q. And he assessed that there was independent medical
 20 evidence that supported your claim that you had been
 21 tortured. Do you remember it was a rule 35 report?
 22 **A. Yes.**
 23 Q. Is it also right that the Home Office responded to that
 24 rule 35 report on the next day, 25 July, noting the
 25 appeal decision of 2010 but accepting that your account

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1 in the rule 35 report met the definition of torture?
 2 **A. Yes.**
 3 Q. Do you understand what I've just asked you?
 4 **A. Yes.**
 5 Q. Is it also right that, in the following year,
 6 in November 2018, you were assessed by another doctor,
 7 Dr James Brockbank of the Helen Bamber Foundation --
 8 **A. Yes.**
 9 Q. -- who diagnosed you with PTSD and found your clinical
 10 presentation to be entirely in keeping with a history of
 11 torture?
 12 **A. Yes.**
 13 Q. And also found, as he put it, that most of your scars
 14 were highly consistent with the account of torture that
 15 you gave?
 16 **A. Yes.**
 17 Q. And finally in this regard, is it right that the
 18 Home Office has since given you a fresh right of appeal,
 19 and that was in June of this year --
 20 **A. Correct.**
 21 Q. -- in your immigration and asylum case, accepting that
 22 you have a fresh claim under the immigration rules --
 23 **A. Correct.**
 24 Q. -- so that your evidence creates a realistic prospect of
 25 success if it went before an immigration judge again?

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1 **A. Exactly.**
 2 Q. Are you happy now I've asked all those questions?
 3 **A. Yes, I do.**
 4 Q. Let's go back in time, then, please. You were
 5 detained -- again, I'm looking at your witness
 6 statement. Chair, it's paragraph 9 onwards of
 7 the inquiry statement, tab A/1. You were detained on
 8 17 May 2017; is that right?
 9 **A. Correct.**
 10 Q. After you went through a marriage interview which the
 11 Home Office said was a sham?
 12 **A. Correct.**
 13 Q. You remember that. You were detained until 14 October
 14 of that same year; is that correct?
 15 **A. 4 October.**
 16 Q. The 4th or 14th?
 17 **A. Fourth. 04.**
 18 Q. All right.
 19 **A. It was a Wednesday.**
 20 Q. I'm not going to quibble with you. I found the date
 21 somewhere else, but it doesn't matter. In October, let
 22 us say, 2017.
 23 **A. Yes.**
 24 Q. Your detention at Brook House began a little after
 25 4.00 o'clock on the morning of 18 May when -- did you

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1 see a nurse for health screening on that morning?
 2 **A. Yes.**
 3 Q. Do you remember telling the nurse -- I'm going to
 4 summarise some of this to you. You told the nurse you'd
 5 been assaulted by police in the Ivory Coast on two
 6 occasions while on a protest rally. Do you remember
 7 saying that?
 8 **A. Yes, correct.**
 9 Q. But there was no rule 35 appointment made at that time?
 10 **A. Not at all.**
 11 Q. Did you also disclose that there had been previous
 12 self-harming by you?
 13 **A. Yes.**
 14 Q. Do you understand my question, that you had harmed
 15 yourself before?
 16 **A. Yes.**
 17 Q. And you had no recollection of being seen by a doctor
 18 within 24 hours of being detained at Brook House --
 19 **A. Correct.**
 20 Q. -- as required by rule 34 of the Detention Centre
 21 Rules?
 22 **A. (Witness nods).**
 23 Q. Now, that was 18 May. You stayed at Brook House one day
 24 at that time?
 25 **A. Exactly.**

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2 (Pages 5 to 8)

1 Q. And you were transferred to the Verne the next day?

2 **A. Yes.**

3 Q. Why were you transferred? Do you know?

4 **A. Abiding to my memory, my previous solicitor make appeal.**

5 **They said, "We are going to give you time. Two weeks.**

6 **Return. We process the case, and then we will take**

7 **a decision". So what is -- it is about. So the reason**

8 **for why they send me to the Verne.**

9 Q. So it was something to do with something your previous

10 solicitors had done?

11 **A. Yes.**

12 Q. And because of it, they sent you away from the Gatwick

13 area to the Verne?

14 **A. Yes.**

15 Q. Is that what we understand?

16 **A. Yes.**

17 Q. Can we put up on the screen, please, <HOM0322022>.

18 Chair, it's B/2. It's not coming up on the screen.

19 I just have a feeling it is going to be one of those

20 days.

21 THE CHAIR: My apologies, sir. We have a technical problem.

22 (11.19 am)

23 (A short break)

24 (12.03 pm)

25 THE CHAIR: Thank you very much.

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1 MR ALTMAN: Chair, given the snail-like progress, can

2 I suggest we sit through until 1.00 pm, instead of

3 12.30 pm?

4 THE CHAIR: Thank you.

5 MR ALTMAN: Up on screen is a document headed "Immigration

6 removal centre. Detainee induction sheet". I was

7 asking you about your first admission to Brook House.

8 If we can just expand the top, please, for a moment.

9 You will see it shows at the top under your cipher

10 "Detained since: 17 May 2017 at 01.59 pm". Do you

11 remember what 1.59 is, or should it be 1.59 pm or

12 1.59 am or does that time make any sense to you?

13 **A. Pm. 1.59 pm.**

14 Q. Is right?

15 **A. Yes.**

16 Q. You were asked, if we look at the form, various

17 questions, and whoever completed the form was able to

18 tick "yes" or "no". Can we go to the bottom of

19 the form, because you deal with this in your second

20 annex. Why are you holding up Post-its?

21 **A. It is about the time, the day, 1.59 pm. I'm sorry.**

22 **That time, on 17 May, I was in the Home Office in**

23 **Croydon.**

24 Q. So that's the time?

25 **A. That time is wrong.**

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1 Q. What time should it be?

2 **A. It should be "am".**

3 Q. "am". That's why I asked.

4 **A. Yes, because I didn't -- I'm not sure, I'm sorry.**

5 Q. You don't have to be sorry. Looking at the bottom of

6 the form now that you have on screen, do you see that

7 there are three "Free text" boxes at the bottom?

8 **A. Yes.**

9 Q. Do you see the second one, "Welfare issues/behaviour

10 issues/other observations". You dealt with this in your

11 second annex. Were you asked about any special needs,

12 that you remember?

13 **A. I don't.**

14 Q. You don't. If you had been asked, would you have

15 answered that you had a previous diagnosis of

16 post-traumatic stress disorder?

17 **A. Yes.**

18 Q. Or that you had been previously tortured?

19 **A. Yes, I would have said that.**

20 Q. Can you explain why that box is empty? If you weren't

21 asked questions, did you not say to the person who was

22 completing this form that you had particular issues?

23 Can you understand why the form is blank?

24 **A. No.**

25 Q. Let's move on, then, please. I want to ask you from

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1 various -- we will see how we get on, but some various

2 entries in your medical records, and you will have seen

3 these. Can we put up on screen -- take this down,

4 please, and we will be coming back to this document from

5 time to time. Chair, it's bundle B/3 for you. For us,

6 it's <DL0000040>. We start at page 49, please. Right

7 at the bottom of that page, you will see "18 May" at

8 4.17, so that's in the morning. This is at Brook House

9 you were seen by somebody called Christopher Paynter,

10 a staff nurse. Here you give a history. You will see

11 it says "New admission -- from sign in Centre in

12 London". Is that where you were detained, somewhere in

13 London?

14 **A. Croydon. Home Office reporting centre.**

15 Q. You were brought from there to Brook House. "No medical

16 problems/no thoughts of self-harm or suicide -- no known

17 allergies. States he was assaulted by police on two

18 separate occasions when on a protest rally."

19 Do you remember I asked you that before?

20 **A. (Witness nods).**

21 Q. It may seem a long time ago now, but I asked you that

22 before and you confirmed it:

23 "Previous self-harm 2009 left wrist injury --

24 punched wall ..."

25 Do you remember that?

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3 (Pages 9 to 12)

<p>1 A. (Witness nods).</p> <p>2 Q. So that's what you told the nurse on 18 May in the early</p> <p>3 hours of the morning. Do you remember what time you</p> <p>4 arrived at Brook House?</p> <p>5 A. According to my memory, it was after 1.00 o'clock in the</p> <p>6 morning.</p> <p>7 Q. But the other time was 17 May. If it was after</p> <p>8 1 o'clock, that other document should have said the</p> <p>9 18th, presumably?</p> <p>10 A. I don't get it. Could you repeat, please?</p> <p>11 Q. Do you remember the document I showed you a little</p> <p>12 before?</p> <p>13 A. Yes.</p> <p>14 Q. When it said 17 May, 1.59 pm?</p> <p>15 A. Yes.</p> <p>16 Q. Should that have been 18 May as well?</p> <p>17 A. No, because --</p> <p>18 Q. It shouldn't?</p> <p>19 A. -- that time was -- until past midnight, I was still in</p> <p>20 Croydon.</p> <p>21 Q. You were still in Croydon?</p> <p>22 A. Yes, so it might be am, not pm.</p> <p>23 Q. That relates to Croydon, all right. Let's look at</p> <p>24 another page, please, of these medical records. The way</p> <p>25 they are copied, unfortunately, chair, is they are</p> <p style="text-align: center;">Page 13</p>	<p>1 "Prisoner has a psychiatric nurse or care worker in</p> <p>2 the community ...</p> <p>3 "No suicidal thoughts.</p> <p>4 "No thoughts of deliberate self-harm ...</p> <p>5 "...</p> <p>6 "Has not stayed in psychiatric hospital ...</p> <p>7 "Prisoner has received medication for mental health</p> <p>8 problems ...</p> <p>9 "Prisoner has received treatment from a psychiatrist</p> <p>10 outside prison ..."</p> <p>11 Do you agree that these are the -- this was the kind</p> <p>12 of conversation you had with the person who saw you on</p> <p>13 that occasion?</p> <p>14 A. Disagree. I've never been in prison, I've never been in</p> <p>15 prison. So that's a lie.</p> <p>16 Q. What's a lie?</p> <p>17 A. About me to be as prisoner. I never go to prison.</p> <p>18 Q. This is the form that is filled out, and it uses the</p> <p>19 word "prison", I suspect, that's why it says "Prisoner"?</p> <p>20 A. Who filled this form?</p> <p>21 Q. It was Mr Paynter.</p> <p>22 A. So he did wrong.</p> <p>23 Q. Say that again?</p> <p>24 A. He did wrong.</p> <p>25 Q. But he was right to take down, "Victim of torture,</p> <p style="text-align: center;">Page 15</p>
<p>1 backwards, so we work backwards in this document, as far</p> <p>2 as I have been able to tell. So we start at page 48,</p> <p>3 please. If we look at the bottom third -- it is hard to</p> <p>4 pinpoint, but if we can start with:</p> <p>5 "Health information the prisoner thinks is important</p> <p>6 ... -- self-harmed in 2009 -- injured left hand --</p> <p>7 punched a wall.</p> <p>8 "Prisoner has not tried to harm themselves (in</p> <p>9 prison)."</p> <p>10 Had you ever been in prison?</p> <p>11 A. Here or back home?</p> <p>12 Q. In this country.</p> <p>13 A. Never.</p> <p>14 Q. "Prisoner has tried to harm themselves (outside</p> <p>15 prison)."</p> <p>16 That's presumably the punching a wall. Then:</p> <p>17 "Impressions of the prisoner's behaviour and mental</p> <p>18 state ... -- calm -- co-operative -- good eye contact."</p> <p>19 Do you see beneath that "Victim of torture"; do you</p> <p>20 see that?</p> <p>21 A. Yes.</p> <p>22 Q. "Beaten by police in 2009 -- he was hit by wood and</p> <p>23 plastic rods -- on two occasions while on a protest</p> <p>24 rally."</p> <p>25 Then two lines beneath that:</p> <p style="text-align: center;">Page 14</p>	<p>1 beaten by police" --</p> <p>2 A. Correct.</p> <p>3 Q. That's accurate?</p> <p>4 A. Yes.</p> <p>5 Q. That must have come from you?</p> <p>6 A. Yes.</p> <p>7 Q. On page 47 of this document, please, there is another</p> <p>8 entry that I want you to look at. It is the 18 May one</p> <p>9 just before halfway down, it's the long entry, where you</p> <p>10 saw Maria Barclay, a healthcare assistant. This time,</p> <p>11 you'd been sent to the Verne by now. Do you see in the</p> <p>12 right-hand entries, this is at the Verne? So you'd been</p> <p>13 moved from Brook House. Do you see at the bottom:</p> <p>14 "18 May 2017 23:56."</p> <p>15 So just before midnight. Are you with me?</p> <p>16 A. Yes.</p> <p>17 Q. If we can look at the entry below that, please, because</p> <p>18 it's the entry I want to see, so all of that text. You</p> <p>19 can see at the top:</p> <p>20 "New patient screening ..."</p> <p>21 So, as far as the Verne is concerned, it was another</p> <p>22 admission, so you went through the same process. There</p> <p>23 is only one thing I want to ask you about here, which we</p> <p>24 are asked to ask you on behalf of G4S: did you see it</p> <p>25 says "Referred to GP"? Do you see it says "referred to</p> <p style="text-align: center;">Page 16</p>

<p>1 GP" about five lines down?</p> <p>2 A. Yes.</p> <p>3 Q. Were you referred to a GP?</p> <p>4 A. At the Verne.</p> <p>5 Q. At the Verne; yes?</p> <p>6 A. Yes.</p> <p>7 Q. Why was that?</p> <p>8 A. It was a normal check-in for any detainees who will be</p> <p>9 staying there for the first day.</p> <p>10 Q. Was it the rule 34?</p> <p>11 A. No. That's -- the rule 34 -- the rule 35, you're</p> <p>12 talking about?</p> <p>13 Q. No. Do you remember you have to be seen by a medical</p> <p>14 practitioner or a healthcare person within 24 hours? Do</p> <p>15 you remember you referred to rule 34, not 35, earlier?</p> <p>16 Was that it, or for some other reason?</p> <p>17 A. Could you explain me about the rule 34?</p> <p>18 Q. Let's make it more simple than that. Why were you</p> <p>19 referred to a GP?</p> <p>20 A. To see the doctor there.</p> <p>21 Q. To see ...?</p> <p>22 A. To see the doctor in the Verne.</p> <p>23 Q. In the Verne. Why?</p> <p>24 A. Abiding to my memory, when I get there, again</p> <p>25 I explained my mental health to be a victim of torture.</p> <p style="text-align: center;">Page 17</p>	<p>1 Q. "Phx", past history, "of torture according to patient</p> <p>2 report (although states has had torture report in past</p> <p>3 which Home Office doesn't accept). No previous</p> <p>4 rule 35 -- not previously detained. Requires rule 35</p> <p>5 full assessment completion in view of past history."</p> <p>6 Then there are some aspects of the examination of</p> <p>7 you. It looks like you had some pain and you were</p> <p>8 prescribed ibuprofen and you were told what to do with</p> <p>9 that. So that's you seeing Dr Fowler. Do you know if,</p> <p>10 at the Verne, a rule 35 referral was in fact made, at</p> <p>11 the Verne?</p> <p>12 A. At the Verne, yes.</p> <p>13 Q. You think it was?</p> <p>14 A. Yes.</p> <p>15 Q. Do you know who you saw?</p> <p>16 A. The doctor, the lady.</p> <p>17 Q. Which one? Dr Fowler, or somebody else?</p> <p>18 A. She's -- background is Asian.</p> <p>19 Q. She's ...?</p> <p>20 A. Asian.</p> <p>21 Q. Asian?</p> <p>22 A. Yes.</p> <p>23 Q. So not Dr Fowler?</p> <p>24 A. Dr Fowler is British.</p> <p>25 Q. Yes, yes.</p> <p style="text-align: center;">Page 19</p>
<p>1 Q. So you explained that you had been a victim of torture?</p> <p>2 A. Yes.</p> <p>3 Q. Was that why you were referred to a GP?</p> <p>4 A. It might be that, because when I went there, rather than</p> <p>5 go through my mental health, they just saw check-in --</p> <p>6 make a general check-in.</p> <p>7 Q. So rather than go through your mental health, this was</p> <p>8 a general check-in, is the way you're putting it?</p> <p>9 A. Yes.</p> <p>10 Q. Now, if we can go to another page of these reports,</p> <p>11 medical records, sorry, page 45, and see if we can</p> <p>12 follow this up. Towards the top half of the page, do</p> <p>13 you see again at the Verne on 23 May, so a few days</p> <p>14 later, at 10.47 in the morning, you were seen by</p> <p>15 Dr Jane Fowler. Do you see that, also at the Verne?</p> <p>16 A. Yes.</p> <p>17 Q. Was that the GP you were referred to?</p> <p>18 A. That day --</p> <p>19 Q. No. When we saw that you were referred to GP, is she</p> <p>20 the GP who was to see you?</p> <p>21 A. Yes, correct.</p> <p>22 Q. You told her about torture. Do you see that four lines</p> <p>23 down there is an entry "Phx", "Phx of torture". Can you</p> <p>24 highlight that, please, just that section?</p> <p>25 A. Yes.</p> <p style="text-align: center;">Page 18</p>	<p>1 A. No.</p> <p>2 Q. So you saw another doctor?</p> <p>3 A. Another doctor.</p> <p>4 Q. At the Verne or Brook House?</p> <p>5 A. The Verne.</p> <p>6 Q. Man or woman?</p> <p>7 A. Woman.</p> <p>8 Q. When you saw that doctor, did she complete a rule 35</p> <p>9 report on you?</p> <p>10 A. No.</p> <p>11 Q. Why not?</p> <p>12 A. When I get there, I didn't know she would do a rule 35,</p> <p>13 I didn't know about rule 35 at this --</p> <p>14 Q. At that point, okay.</p> <p>15 A. Then she asked me, "Do you know why I call you?" I said</p> <p>16 no. Because I got a slip under my door.</p> <p>17 Q. You got a slip under your door?</p> <p>18 A. Letting me know that I have an appointment with the</p> <p>19 doctor.</p> <p>20 Q. So you had an appointment from the doctor, you knew that</p> <p>21 from the slip under the door. When you saw her, she</p> <p>22 asked you whether you understood why you were seeing</p> <p>23 her. You said no, and what happened?</p> <p>24 A. She said okay. "I saw your file. You have been</p> <p>25 a victim of the torture".</p> <p style="text-align: center;">Page 20</p>

1 Q. "I saw your file. You've been a victim of torture?"
 2 **A. So had to do a rule 35.**
 3 Q. Is that the first time you heard of rule 35?
 4 **A. Yes.**
 5 Q. All right.
 6 **A. So she asked me what happened, so I was sitting there**
 7 **without knowing about that. My mental health was worse.**
 8 Q. Yes.
 9 **A. So I tried to recollect my memory, and start to tell her**
 10 **what happened to me back home. She stopped me and tell**
 11 **me that she needs the dates for each event.**
 12 Q. Of what, of the torture?
 13 **A. Of the torture. So I said, "I'm sorry, I'm not right**
 14 **now to recollect my brains to give you the exact date".**
 15 **So what I've got to do, I need some time to consult**
 16 **myself, mentally focus, and I will come back". So we**
 17 **agree we will meet up.**
 18 Q. Another time?
 19 **A. Another time.**
 20 Q. Did you, in fact, see her another time?
 21 **A. No.**
 22 Q. Because, what, you went back to the Brook House?
 23 **A. Exactly.**
 24 Q. You did see another doctor, though, it appears, on
 25 1 June 2017 at the Verne. If we can go, please, to

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1 page 44 of the medical records, at the top. Do you see
 2 on 1 June at 14:07, so 7 minutes past 2 in the
 3 afternoon, you saw a doctor Margit Szel, a sessional GP,
 4 I suppose that could be the same sort of thing as
 5 a locum, at the Verne. Clinical examination:
 6 "On 6 February 2009 in Ivory Coast, he was
 7 confronted by the police after finishing a political
 8 meeting for his party ... He managed not to be arrested
 9 by the help of party members. Police did not hit or
 10 beat him."
 11 The plan was discussed:
 12 "... this is not a torture and he expressed that
 13 needs time to collect his memories what happened earlier
 14 when he thinks has been tortured and will come back to
 15 us."
 16 So that's the appointment you have been telling us
 17 about? That is right? That's, as you recollect it, the
 18 Asian female doctor. You said you need to think about
 19 dates?
 20 **A. Correct.**
 21 Q. And that is the entry that you have just been telling us
 22 about, on 1 June?
 23 **A. Correct.**
 24 Q. So that's 1 June. Maybe four weeks later, you go back
 25 to Brook House?

Page 22

1 **A. Correct.**
 2 Q. That's 28 June; is that right?
 3 **A. Yes. Correct.**
 4 Q. 2017. Why did you return to Brook House? Do you know
 5 why?
 6 **A. According to --**
 7 Q. Take your hand away from your mouth so we can hear you,
 8 please.
 9 **A. According to officials, because they didn't tell me the**
 10 **truth.**
 11 Q. Pause there. According to ...?
 12 **A. To the security guard.**
 13 Q. At?
 14 **A. At Verne, at the Verne.**
 15 Q. But they didn't tell you the truth?
 16 **A. Yes.**
 17 Q. Just tell us what you were told?
 18 **A. They told me that I have an appointment with my embassy,**
 19 **Ivory Coast embassy, in that week.**
 20 Q. Pause there. Stop. So they told you at the Verne that
 21 you had an appointment with your embassy at Gatwick?
 22 **A. Yes.**
 23 Q. Which is the reason you were being sent back to
 24 Brook House?
 25 **A. Exactly.**

Page 23

1 Q. You say it wasn't the truth?
 2 **A. Yes.**
 3 Q. What was the truth?
 4 **A. The truth, that I got a flight on the next day.**
 5 Q. So you had removal directions?
 6 **A. Yes.**
 7 Q. So you had a flight on the next day?
 8 **A. The next day.**
 9 Q. So that would be 29 June?
 10 **A. A Thursday.**
 11 Q. When you went back to Brook House, when was it you
 12 discovered the truth?
 13 **A. At reception.**
 14 Q. How did you feel when you were told the truth?
 15 **A. I was ...**
 16 Q. It's all right. Take your time. Do you want me to read
 17 what you said in one of your witness statements?
 18 **A. Yes.**
 19 Q. Shall I read to you and see if you agree with it?
 20 **A. Yes, please.**
 21 Q. You said -- and this is, chair, paragraph 16 of annex 1,
 22 which is A/2:
 23 "When I was in reception, I asked a security guard
 24 about my meeting with the embassy. He looked confused
 25 and asked me if I knew why I had been transferred to

Page 24

6 (Pages 21 to 24)

<p>1 Brook House. The guard explained that I had a flight to</p> <p>2 go to the Ivory Coast the next day. I had not received</p> <p>3 any notice of my removal.</p> <p>4 "I started seeing stars and my heart was beating</p> <p>5 very fast. I felt sick."</p> <p>6 Do you remember that?</p> <p>7 A. Yes, correct.</p> <p>8 Q. Because it was a shock to you?</p> <p>9 A. It was more than shock.</p> <p>10 Q. It was what?</p> <p>11 A. More than --</p> <p>12 Q. No, I understood. What was it, then?</p> <p>13 A. I was -- on the night time, I was thinking about a lot</p> <p>14 of worse things. For me, I tell myself it's rather that</p> <p>15 I end my life, than they force me to go back from where</p> <p>16 I flee from persecution. And I was -- all my body was</p> <p>17 shaking and I have some tears coming from my eyes. And</p> <p>18 then the guard -- I asked the reception, "I need to call</p> <p>19 my solicitor".</p> <p>20 Q. Did you call your solicitor at that point?</p> <p>21 A. After, when they finished the processing.</p> <p>22 Q. So after the reception process was finished, you were</p> <p>23 allowed to call your solicitor. Let's look again at the</p> <p>24 records. We have up page 44. Let's look at another</p> <p>25 entry, please, at 17:37. It is towards the bottom third</p> <p style="text-align: center;">Page 25</p>	<p>1 Q. Let me ask you, then, some other things. We will come</p> <p>2 back to other issues of your evidence. But when you</p> <p>3 came back to Brook House on 28 June, so on this</p> <p>4 occasion, did you stay on B wing?</p> <p>5 A. Yes.</p> <p>6 Q. For how long?</p> <p>7 A. Less than a week.</p> <p>8 Q. I think you said, to remind you of what you said in one</p> <p>9 of your statements, a couple of days?</p> <p>10 A. Yes.</p> <p>11 Q. Can I ask you this, so that we are clear: when you were</p> <p>12 detained at Brook House to begin with, the very first</p> <p>13 time, in May, did you stay overnight at Brook House or</p> <p>14 did you go straight to the Verne?</p> <p>15 A. No, straight away.</p> <p>16 Q. Straight away. On this occasion, you stayed a couple of</p> <p>17 days on B wing. I think you were moved to D wing?</p> <p>18 A. Correct.</p> <p>19 Q. Were you ever on E wing?</p> <p>20 A. Never.</p> <p>21 Q. Or the Care and Separation Unit, the block?</p> <p>22 A. No.</p> <p>23 Q. Tell us about the room conditions or the cell</p> <p>24 conditions? We just see you grimace, but tell us what</p> <p>25 you recall of the conditions that you were detained in?</p> <p style="text-align: center;">Page 27</p>
<p>1 of the page. So it is 28 June at 37 minutes past 5.</p> <p>2 This time you're seeing a mental health nurse by the</p> <p>3 name of Skeete Jitta. The information you give:</p> <p>4 "Born in Ivory Coast ...</p> <p>5 "Health information received from outside source ...</p> <p>6 "Has no outstanding hospital/doctors appointments</p> <p>7 ...</p> <p>8 "Speaks English well ...</p> <p>9 "Fit to attend gym ...</p> <p>10 "Main spoken language English ...</p> <p>11 "Christian ...</p> <p>12 "Prisoner has concerns over their physical health</p> <p>13 ... -- [apparently] none."</p> <p>14 Two lines below that, as we saw before:</p> <p>15 "Victim of torture ... -- said he was tortured by</p> <p>16 the police between 2004-2009. Came to the UK in 2009</p> <p>17 and claimed asylum."</p> <p>18 So this is 28 June. You're being seen by a mental</p> <p>19 health nurse. Do you remember being seen by any doctor</p> <p>20 within 24 hours --</p> <p>21 A. No.</p> <p>22 Q. -- of your return to Brook House?</p> <p>23 A. Not according to my memory, no.</p> <p>24 Q. Was any rule 35 assessment made at that time?</p> <p>25 A. No.</p> <p style="text-align: center;">Page 26</p>	<p>1 First of all, did you have a roommate?</p> <p>2 A. Yes, I did.</p> <p>3 Q. All the way through?</p> <p>4 A. Yes.</p> <p>5 Q. Were you with one man or two men?</p> <p>6 A. One man.</p> <p>7 Q. What were the conditions like? Were they good or bad?</p> <p>8 A. Worse.</p> <p>9 Q. Worse in what way?</p> <p>10 A. Worse that affect on my mental health.</p> <p>11 Q. So they affected your mental health?</p> <p>12 A. Yes.</p> <p>13 Q. Describe -- we have heard some evidence already about</p> <p>14 the cell or the room conditions, but from your</p> <p>15 perspective, what was the worst part of it?</p> <p>16 A. It remind me of bad time in prison back home on</p> <p>17 Ivory Coast.</p> <p>18 Q. On Ivory Coast?</p> <p>19 A. It's smelly.</p> <p>20 Q. So we have the smell. Because of the toilet?</p> <p>21 A. Yes.</p> <p>22 Q. All right. What else?</p> <p>23 THE CHAIR: Take your time, sir. Maybe have a sip of water.</p> <p>24 MR ALTMAN: If you don't want to tell me, do you want me to</p> <p>25 read what you said? Would that be easier? Would you</p> <p style="text-align: center;">Page 28</p>

<p>1 like me to read to you what you said? Would that be</p> <p>2 easier? Would it be easier if I read you what you said</p> <p>3 in your statement?</p> <p>4 A. Could I have a break, please?</p> <p>5 THE CHAIR: You'd like a break?</p> <p>6 A. Yes.</p> <p>7 THE CHAIR: Of course. I'll rise for five minutes and then</p> <p>8 see how you are. No problem.</p> <p>9 (12.32 pm)</p> <p>10 (A short break)</p> <p>11 (12.46 pm)</p> <p>12 MR ALTMAN: You will remember I was asking you about the</p> <p>13 conditions in which you were detained in the cell or the</p> <p>14 room. You mentioned smells. Were you locked in three</p> <p>15 times a day?</p> <p>16 A. Yes.</p> <p>17 Q. Do you remember that?</p> <p>18 A. Yes.</p> <p>19 Q. Did the lock-ins make you feel depressed?</p> <p>20 A. Yes.</p> <p>21 Q. Because they reminded you of the torture you had</p> <p>22 undergone?</p> <p>23 A. Correct.</p> <p>24 Q. Was there anything else about the rooms? We know about</p> <p>25 the toilets. Did you have to clean your room?</p> <p style="text-align: center;">Page 29</p>	<p>1 he was arrested and held in prison by the military</p> <p>2 police in his own country ..."</p> <p>3 Do you remember saying that?</p> <p>4 A. Yes.</p> <p>5 Q. "He also says this is causing him to have flashbacks</p> <p>6 which disturb his sleep at night.</p> <p>7 "Mental health assessment ...</p> <p>8 "...</p> <p>9 "He is a 46-year-old male who is originally from the</p> <p>10 Ivory Coast ... states that he came to the UK in 2009 to</p> <p>11 seek asylum because he was not safe in his own country,</p> <p>12 however, said that his application had been refused."</p> <p>13 If we go, please, to page 38. If we look roughly</p> <p>14 about ten lines down, and the line begins, "Feeling the</p> <p>15 way he does":</p> <p>16 "Also stated that being held here in detention</p> <p>17 reminds him of when he had been arrested by the military</p> <p>18 and tortured especially at night when he is locked in</p> <p>19 his room and he can hear doors opening with keys.</p> <p>20 During the appointment, although he did appear to be</p> <p>21 anxious, there was no evidence of any psychotic symptoms</p> <p>22 or content in his speech and denies any thoughts of</p> <p>23 self-harm at this time. However, did say that at times</p> <p>24 he did think about harming himself to see if immigration</p> <p>25 would pay attention to him."</p> <p style="text-align: center;">Page 31</p>
<p>1 A. Even if we have to clean, they didn't give us any</p> <p>2 product.</p> <p>3 Q. Did you ask?</p> <p>4 A. Yes. We asked.</p> <p>5 Q. For toilet brushes or --</p> <p>6 A. Toilet brushes.</p> <p>7 Q. Cleaning products?</p> <p>8 A. Cleaning products, like to clean inside there, so --</p> <p>9 Q. Did you get them --</p> <p>10 A. No.</p> <p>11 Q. -- when you asked?</p> <p>12 A. Yes.</p> <p>13 Q. Did you ask more than once?</p> <p>14 A. I asked twice. My cellmate did as well.</p> <p>15 Q. Yes.</p> <p>16 A. You didn't get any feedback.</p> <p>17 Q. Let's look, please, at another entry in the medical</p> <p>18 records, this time for 6 August, at page 39 to begin.</p> <p>19 It's the bottom third, please, 6 August at 16:22. Do</p> <p>20 you see then you saw a mental health nurse,</p> <p>21 James Newlands. Halfway through that entry, do you</p> <p>22 read:</p> <p>23 "Informs me that his problem of feeling stressed and</p> <p>24 anxious has started again now that he has been held here</p> <p>25 in detention. States this brings back memories of when</p> <p style="text-align: center;">Page 30</p>	<p>1 If we can go to page 32, please. 30 September at</p> <p>2 the top, second entry. Can we expand that, please. At</p> <p>3 11.29:</p> <p>4 "Seen by triage nurse ... -- seen in clinic, spoke</p> <p>5 about feeling anxious especially at night when the rooms</p> <p>6 are locked, spoke about stomach issues and waking when</p> <p>7 he hears the noise outside.</p> <p>8 "Overview notes ... -- suggested his issues could be</p> <p>9 anxiety related to being locked, suggested that he could</p> <p>10 consider asking for a transfer to Tinsley House as the</p> <p>11 rooms are not locked there at night, review in clinic in</p> <p>12 one week."</p> <p>13 Did you try to make any transfer to Tinsley House?</p> <p>14 A. Yes.</p> <p>15 Q. Without success?</p> <p>16 A. Yes.</p> <p>17 Q. You will recall that you raised a number of complaints</p> <p>18 which the Professional Standards Unit of the Home Office</p> <p>19 looked into. Do you remember that?</p> <p>20 A. No.</p> <p>21 Q. You remember you made 11 allegations?</p> <p>22 A. Yes.</p> <p>23 Q. Six of which were unsubstantiated, four of which were</p> <p>24 substantiated and one was partly substantiated. Do you</p> <p>25 remember?</p> <p style="text-align: center;">Page 32</p>

<p>1 A. According -- yes, according to the PCSU.</p> <p>2 Q. That's what I'm talking about, the PSU. Let's look at</p> <p>3 this. I will take you to the various parts of</p> <p>4 the report. I'm going to ask you about one of the</p> <p>5 allegations that you made, please, it's <HOM002748> at</p> <p>6 page 42. If we look at page 42, allegation 11 -- I'm</p> <p>7 not going to read through all of this, but we can just</p> <p>8 see the allegations you made. The allegation there,</p> <p>9 allegation 11, so that's the 11th of 11 allegations:</p> <p>10 "That the toilet facilities in [your] room were</p> <p>11 inadequate and lacked privacy, causing [you] humiliation</p> <p>12 when using during times when [your] room was locked."</p> <p>13 That was one of the complaints you had and it was</p> <p>14 one of the things you said in your witness statements.</p> <p>15 If we go to the next page, please, at page 43, at</p> <p>16 paragraph 7.11.6, your evidence about the toilet was</p> <p>17 that you were upset and humiliated about the state of</p> <p>18 the toilet and having to use this in front of a roommate</p> <p>19 and to be subject to being present when the roommate</p> <p>20 used this:</p> <p>21 "I understand ..."</p> <p>22 That's the investigator:</p> <p>23 "... that the responsibility for cleaning the</p> <p>24 toilets falls to the detainees themselves and cleaning</p> <p>25 products are available."</p> <p style="text-align: center;">Page 33</p>	<p>1 A. That day, when I went to -- it was at Croydon. At</p> <p>2 Croydon, we have this meeting to make an interview</p> <p>3 regarding --</p> <p>4 Q. In Croydon?</p> <p>5 A. In Croydon, yes. It is on the same place of 7th where</p> <p>6 I be arrested --</p> <p>7 Q. In the first place?</p> <p>8 A. In the first place. So I was so fretful, shocked, bring</p> <p>9 back my memory there. When you start the interview,</p> <p>10 I asked -- it was a lady -- if, by the hand, I can have</p> <p>11 a copy of audio.</p> <p>12 Q. A copy of ...?</p> <p>13 A. The audio. Because she --</p> <p>14 Q. Was it audio recorded?</p> <p>15 A. Yes, audio recorded. We agree about that.</p> <p>16 Surprisingly, from that day until now, I didn't receive</p> <p>17 anything.</p> <p>18 Q. So you've never heard the recording?</p> <p>19 A. Nothing.</p> <p>20 Q. But it's all written down, and we have the notes of</p> <p>21 the interview, which I'm sure you've seen?</p> <p>22 A. My point is that the audio would be more obvious what</p> <p>23 I said that day --</p> <p>24 Q. Yes, more accurate.</p> <p>25 A. -- than what she wrote down.</p> <p style="text-align: center;">Page 35</p>
<p>1 You say they weren't:</p> <p>2 "Other than that, the toilet in the room, room</p> <p>3 sharing and lock-up are an accepted norm by the</p> <p>4 Home Office at this time and no issue has been raised in</p> <p>5 the centre-wide review by Sir Shaw."</p> <p>6 That is how it reads, Stephen Shaw is what it is</p> <p>7 a reference to:</p> <p>8 "Current Home Office policy is that D668 need only</p> <p>9 have access to a toilet and he did. On the evidence and</p> <p>10 to a balance of probabilities, I find the allegation</p> <p>11 that the toilet facilities were inadequate and lacked</p> <p>12 privacy unsubstantiated unless found otherwise by the</p> <p>13 wider Home Office review."</p> <p>14 So that was the outcome of allegation 11. You will</p> <p>15 remember that, on 20 December 2017, you were interviewed</p> <p>16 by the PSU investigators over a lengthy period of time</p> <p>17 where you made all of your complaints?</p> <p>18 A. Correct.</p> <p>19 Q. This is the outcome of those complaints, obviously the</p> <p>20 PSU also having listened to and investigated the other</p> <p>21 side of your complaint. You understand that?</p> <p>22 Let me ask you about a different topic, please, and</p> <p>23 this is access to legal advice ... yes?</p> <p>24 A. Can I say something about the PSU?</p> <p>25 Q. Yes.</p> <p style="text-align: center;">Page 34</p>	<p>1 Q. Of course, of course. But you accept we have the notes</p> <p>2 of the interview. They go on for several pages. What</p> <p>3 you don't have is the audio, which would have been</p> <p>4 clearer, but you're not saying, are you, that you don't</p> <p>5 accept the record of the interview that was made?</p> <p>6 A. Some records I don't accept.</p> <p>7 Q. I'm not going to go into all of that detail, I'm afraid,</p> <p>8 now, but we understand that if we look at the interview</p> <p>9 record, it has to come with that health caution, all</p> <p>10 right?</p> <p>11 A. (Witness nods).</p> <p>12 Q. We understand that. One of the problems that you said</p> <p>13 there were, one of the problems that there was, at</p> <p>14 Brook House is, first of all, you said you had a mobile</p> <p>15 phone but it had no credit; do you remember?</p> <p>16 A. Correct.</p> <p>17 Q. And the IT system was not good?</p> <p>18 A. Correct.</p> <p>19 Q. And the internet, when it worked, was slow?</p> <p>20 A. Correct.</p> <p>21 Q. Tell us, it's something that we have heard from at least</p> <p>22 one other person, and may hear again, but did you notice</p> <p>23 the times when the internet was bad?</p> <p>24 A. Yes.</p> <p>25 Q. When? When would it go down?</p> <p style="text-align: center;">Page 36</p>

<p>1 A. It's especially the day the detainees are on charter 2 flight. 3 Q. So when there would be a charter flight -- 4 A. Yes. 5 Q. -- there was -- the internet seemed not to work? 6 A. Not to work. Surprisingly, the other room, I mean the 7 healthcare, where you are to make a copy of -- how they 8 call it? Welfare team, all maintained their working 9 efficiently. And the IT room for the detainees is not 10 working. 11 Q. So you're meaning -- I think I understand. The internet 12 for the welfare team was okay? 13 A. Yes. 14 Q. But for the detainees it wasn't? 15 A. It's not working. Moreover, you don't have signal on 16 mobile phone. 17 Q. No signal? 18 A. If you've got EE mobile phone or you got O2, you don't 19 get the chance to communicate with your solicitor. 20 Q. So EE and O2, the network signal was, what, always bad 21 or only sometimes bad? 22 A. Only Wednesday. 23 Q. Only on Wednesdays, what, when charter flights were due 24 to go out? 25 A. Yes.</p> <p style="text-align: center;">Page 37</p>	<p>1 persistent, problem solving and managing to get the 2 document delivered." 3 And then she noted other aspects of what you had to 4 say at the group. So this was a problem for you, 5 sending documents to your solicitor, because of, what, 6 slow internet? 7 A. Yes. 8 Q. Tell us a little about the emotional health group. What 9 was it, first of all? How many detained men would 10 attend this group? 11 A. From the beginning, it was around 14/15. 12 Q. 14 or 15. How often would you meet? 13 A. According to my memory, I think twice a week. 14 Q. Two hours a week? 15 A. No, twice. 16 Q. Twice a week? 17 A. Yes. 18 Q. Okay. When did you start going? 19 A. I don't remember. 20 Q. How long after you -- maybe not the precise date, but 21 you returned to Brook House at the end of June? 22 A. Yes. 23 Q. How long after that do you think -- a week, two weeks, 24 three weeks? 25 A. We start that from September, I think.</p> <p style="text-align: center;">Page 39</p>
<p>1 Q. Let's look at another part of your medical records, 2 please, because I was asking you specifically, and 3 I want to see what you said, about difficulties sending 4 documents to solicitors. 5 A. Yes. 6 Q. If we can go back to <DL0000040> at page 37, please. If 7 we can go right to the bottom of the page for 14 August 8 at 12.01, do you see you were at an emotional health 9 group? Did Deborah Alred run the group or was this 10 a personal appointment? 11 A. The person in charge, they're coming from outside. 12 Q. Yes. My question is, was this a personal appointment or 13 is this part of a group you attended on 14 August? 14 A. A group. 15 Q. It's a group. She is an occupational therapist, and the 16 note is you "Attended the group and engaged well". So 17 it looks like it is a note of your attendance at the 18 group: 19 "Described how he was managing being in Brook House 20 by mentally preparing himself. He described how stress 21 was affecting him, describing mainly physical symptoms." 22 And then this: 23 "He described his difficulty in sending an important 24 document to his case and how its delivery was delayed by 25 the slow internet connection. He was praised for being</p> <p style="text-align: center;">Page 38</p>	<p>1 Q. So much longer, from September. 2 A. Yes, yes. 3 MR ALTMAN: Chair, I notice the time. It's just gone 4 1.00 pm. I'm nowhere near finished, I'm afraid, so 5 there is a possibility that this witness will occupy the 6 rest of the afternoon. We are where we are. 7 THE CHAIR: Yes. Again, my apologies for the delay, and to 8 you, sir. I know it's very difficult with the 9 disruption, coming back and forth. But we will take 10 a lunch break now and come back at 2.00 pm. 11 (1.03 pm) 12 (The short adjournment) 13 (2.00 pm) 14 MR ALTMAN: You will remember before we broke I was asking 15 you about access to advice and visits, and that sort of 16 thing. You had a recollection of a visit on 17 25 September from the GDWG -- Gatwick Detainees Welfare 18 Group -- somebody called Martin -- 19 A. Yes. 20 Q. -- where you were made to wait for half an hour. Were 21 you told he didn't come or wasn't coming? 22 A. Correct. 23 Q. Is that what you were told by the guards at Brook House? 24 A. Correct. 25 Q. But then you found out he'd actually been there and he</p> <p style="text-align: center;">Page 40</p>

<p>1 himself had waited for three-quarters of an hour?</p> <p>2 A. Correct.</p> <p>3 Q. And that upset you and you complained about it?</p> <p>4 A. Yes.</p> <p>5 Q. Can we look at a letter, which should be on screen,</p> <p>6 please, or about to be put up on screen. It's</p> <p>7 <DL0000158> -- chair, A/8 for you.</p> <p>8 Can we see, first of all, do you see you've written</p> <p>9 "October" and struck it through and then you've written</p> <p>10 "27 September 2017", which is two days after the visit</p> <p>11 was supposed to happen:</p> <p>12 "I am writing today to complain of the poor service</p> <p>13 I received from your staff on ..."</p> <p>14 This is a draft, isn't it?</p> <p>15 A. Yes, it is.</p> <p>16 Q. A draft letter, "on ...", so the date is blank, but it</p> <p>17 says:</p> <p>18 "... 2017. I was visited by a representative of</p> <p>19 GDWG, Mr Martin, at Brook House on that day. Mr Martin</p> <p>20 ... waited for me for 45 minutes while your staff ..."</p> <p>21 What does that word say?</p> <p>22 A. "Informed me".</p> <p>23 Q. "... informed me that he still isn't [turned] up. After</p> <p>24 about 45 minutes had been call in visit corridor ..."</p> <p>25 what does that say?</p> <p style="text-align: right;">Page 41</p>	<p>1 questions about this.</p> <p>2 The question is, you say that this was written</p> <p>3 before you made the formal complaint and you made the</p> <p>4 formal complaint on 27 September. We saw on the first</p> <p>5 page at the top it said "October" and you crossed it</p> <p>6 through; yes? And you replaced "October" with</p> <p>7 "27 September 2017". But if we go to the next page,</p> <p>8 where we were, page 2, and I am going to ask the</p> <p>9 evidence handler to rotate the page completely, if we</p> <p>10 look right at the bottom, do you see on the right-hand</p> <p>11 corner it appears that the document on which you wrote</p> <p>12 the draft was, in fact, printed on 3 October 2017?</p> <p>13 A. (Witness nods).</p> <p>14 Q. So the question is, do you think you are mistaken when</p> <p>15 you say that you drafted this document on or before</p> <p>16 27 September?</p> <p>17 A. That draft, it's the second draft I made it.</p> <p>18 Q. Right.</p> <p>19 A. The first one, it was a blank paper where it was small.</p> <p>20 It was very tiny, you cannot read properly. When I get</p> <p>21 out of the detention, my first solicitor from</p> <p>22 Brook House was Puja.</p> <p>23 Q. Was what?</p> <p>24 A. Her name, my first solicitor before the second, Frankie,</p> <p>25 it was Puja who was --</p> <p style="text-align: right;">Page 43</p>
<p>1 A. The corridor -- "on the visit corridor, when arrive</p> <p>2 after check".</p> <p>3 Q. "I took a seat in the waiting room. Then after five</p> <p>4 minutes one of the officers came to inform me</p> <p>5 [something] visitor ..."</p> <p>6 A. My visitor.</p> <p>7 Q. "... is gone without offered anything by way of</p> <p>8 apology."</p> <p>9 Is that what you said?</p> <p>10 A. Yes.</p> <p>11 Q. This is a draft, was it, that you had written for</p> <p>12 yourself because the complaint was actually going to go</p> <p>13 into the proper form?</p> <p>14 A. Yes.</p> <p>15 Q. You continued on the second page:</p> <p>16 "I am most annoyed that I waited all day for</p> <p>17 Mr Martin to show up. My impression of that ..."</p> <p>18 And you've left something blank:</p> <p>19 "... and I am now concerned about other visit."</p> <p>20 So that was a draft, or a copy of a complaint in</p> <p>21 draft form before you copied it onto the complaint form,</p> <p>22 I think?</p> <p>23 A. (Witness nods).</p> <p>24 Q. Now, I'm asked to ask you this on behalf of G4S, who</p> <p>25 have asked me, with the chair's agreement, to ask you</p> <p style="text-align: right;">Page 42</p>	<p>1 Q. Puja?</p> <p>2 A. It's the one who make all my witness statement on</p> <p>3 12 October.</p> <p>4 Q. Yes.</p> <p>5 A. So when I went to -- in harrow, that's the head office.</p> <p>6 Q. Sorry, when you went to whose office?</p> <p>7 A. My previous solicitor, Puja. So when I showed her the</p> <p>8 letter, she saw it was so tiny, she cannot see it. So</p> <p>9 I said, "Let me write" --</p> <p>10 Q. Rewrite it?</p> <p>11 A. So I was with my back -- I've got some lot of documents</p> <p>12 there from the detention, so I grab this paper and</p> <p>13 rewrite it.</p> <p>14 Q. So you made a copy from a copy?</p> <p>15 A. A copy from a copy. From that, you can see this date.</p> <p>16 Q. So this is your second draft?</p> <p>17 A. Right, second draft.</p> <p>18 Q. And that explains why October is found in two places on</p> <p>19 the document?</p> <p>20 A. Exactly. Exactly.</p> <p>21 Q. Let's then, please, look at the PSU investigation report</p> <p>22 and go back to that, <HOM002748>, please. B/24, chair,</p> <p>23 at page 40. Right at the bottom, you have</p> <p>24 allegation 10, at 7.10:</p> <p>25 "That the IT system in Brook House is so bad that it</p> <p style="text-align: right;">Page 44</p>

<p>1 made it difficult for [you] to send emails to [your]</p> <p>2 lawyers."</p> <p>3 That's another allegation, allegation 10. Let's go</p> <p>4 to page 42, just before allegation 11 appears at 7.10.7.</p> <p>5 The conclusion there was:</p> <p>6 "On the evidence and to a balance of probabilities,</p> <p>7 I find the allegation that the IT system at</p> <p>8 Brook House ... was so bad that it made it difficult for</p> <p>9 [you] to send emails to [your] lawyers part</p> <p>10 substantiated ..."</p> <p>11 It was part substantiated because there was,</p> <p>12 according to the investigator, other means by which you</p> <p>13 could communicate with your solicitors. So that's what</p> <p>14 became of that allegation, still dealing with the same</p> <p>15 topic of the difficulties that you had in communication</p> <p>16 there.</p> <p>17 The other means of communication, if we were to read</p> <p>18 into the investigation report, were phones and fax</p> <p>19 machines, or machine?</p> <p>20 A. (Witness nods).</p> <p>21 Q. Let's look at another topic, please, rule 35 at</p> <p>22 Brook House. If we go back to the medical report,</p> <p>23 please, <DL0000040> at page 41 -- B/3, chair -- you will</p> <p>24 see about halfway down the date 17 July, so if we get</p> <p>25 our bearings, this is to the day, in effect, two months</p> <p style="text-align: center;">Page 45</p>	<p>1 A. No.</p> <p>2 Q. Is that why she referred you to a GP or --</p> <p>3 A. She was a bit confused. I think she was not aware about</p> <p>4 that. She is, like -- she wasn't knowing about the</p> <p>5 rule 35. So I was also in shock about our healthcare in</p> <p>6 detention don't know about rule 35.</p> <p>7 Q. Tell me this: this is 17 July. It's the first time you</p> <p>8 requested a rule 35 report. The question, why didn't</p> <p>9 you ask sooner, is presumably answered because you</p> <p>10 didn't know about it?</p> <p>11 A. No.</p> <p>12 Q. Now, we have here on the same page, 24 July at 13:48,</p> <p>13 where you see Dr Chaudhary. Can you see that?</p> <p>14 A. Yes.</p> <p>15 Q. On page 41 of the same document, which we have open:</p> <p>16 "History: patient claims he was tortured between</p> <p>17 2000 and 2007 in Ivory Coast ... He mentions in the year</p> <p>18 2000 after the presidential election he went to protest</p> <p>19 as he claims they were rigged. He mentions he walked to</p> <p>20 the presidential palace. He mentions he arrived on the</p> <p>21 bridge facing military soldiers who tried to shoot at</p> <p>22 him and others. He mentions he ran back and was</p> <p>23 caught ... he was beaten and mentions bleeding on his</p> <p>24 mouth. He mentions he was beaten on the buttocks by</p> <p>25 a metal object ... passed out ... waking up in</p> <p style="text-align: center;">Page 47</p>
<p>1 since you were first detained.</p> <p>2 On the 17th, do you see Carol Reed, staff nurse:</p> <p>3 "Seen by nurse ...</p> <p>4 "Diagnosis: Requests a rule 35 says he was tortured</p> <p>5 back in West Africa. I have booked a GP appointment for</p> <p>6 24 July."</p> <p>7 When did you first understand rule 35? You told us</p> <p>8 earlier that at first you hadn't even heard of it. When</p> <p>9 did you first become aware of it? Was it at the Verne</p> <p>10 or elsewhere?</p> <p>11 A. First on the detention it was at the Verne and on</p> <p>12 Brook House. I didn't know that there was a right to</p> <p>13 ask to have a rule 35 because, firstly, my first time on</p> <p>14 being there, on 18 May, on the early hour, nobody told</p> <p>15 me about that.</p> <p>16 Q. Okay.</p> <p>17 A. And it is my brother MP --</p> <p>18 Q. Your brother's MP?</p> <p>19 A. Lambeth, I got the letter there, she was send the email</p> <p>20 to me, ask me to request a rule 35.</p> <p>21 Q. So that's how you knew?</p> <p>22 A. Yes. She explained me what is it for, rule 35.</p> <p>23 Q. Did Nicola Wells, the healthcare assistant -- forgive</p> <p>24 me, Carol Reed, the staff nurse, did she know what</p> <p>25 rule 35 was when you asked for it?</p> <p style="text-align: center;">Page 46</p>	<p>1 hospital ..."</p> <p>2 There is more information here in this report,</p> <p>3 certainly the attendance note on the medical records.</p> <p>4 You say in your witness statement you felt rushed</p> <p>5 through this appointment. Is that how you felt, that</p> <p>6 the doctor rushed you through it?</p> <p>7 A. Yes, he did.</p> <p>8 Q. How long did it take? Do you remember now? The whole</p> <p>9 appointment?</p> <p>10 A. It didn't last for 20 minutes.</p> <p>11 Q. I'm also asked to ask you this on behalf of G4S: you</p> <p>12 also said in one of your witness statements that you</p> <p>13 felt intimidated by how the doctor carried out the</p> <p>14 assessment?</p> <p>15 A. Yes.</p> <p>16 Q. Why were you intimidated?</p> <p>17 A. He said, "Speak quick. I don't have enough time.</p> <p>18 People were waiting outside".</p> <p>19 Q. So that was part of feeling rushed?</p> <p>20 A. He spoke me to explain what I went through back home</p> <p>21 because it's not about some kind of story or fairytale</p> <p>22 to sit and talk about my torture. He didn't have</p> <p>23 compassion. One of the things I was waiting for him,</p> <p>24 his compassion, kindness. He didn't give me that. It's</p> <p>25 like he doesn't care.</p> <p style="text-align: center;">Page 48</p>

1 Q. Did you complain about that to anyone at the time?
 2 **A. I spoke to Martin.**
 3 Q. You spoke to Martin?
 4 **A. Yes. It still hurts me.**
 5 Q. Did you receive the rule 35 report after the
 6 appointment?
 7 **A. Yes, I did.**
 8 Q. About half an hour, I think you remember?
 9 **A. He told me to --**
 10 Q. Wait.
 11 **A. -- wait outside, and then he emailed for the nurse. At**
 12 **the end, the nurse came back to me. She handed me the**
 13 **rule 35.**
 14 Q. When you read it, did you discover that there were two
 15 parts that were incomplete?
 16 **A. I saw it but I don't know how important it was to put.**
 17 **I didn't know that.**
 18 Q. Shall we tell everybody what the two parts that were
 19 incomplete were? First was a body map; yes? Do you
 20 remember?
 21 **A. The second was ...**
 22 Q. The second was whether continued detention would harm
 23 you?
 24 **A. Yes. That's regarding to my mental health.**
 25 Q. Your solicitor at the time noticed, because you must

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1 have passed the report to your solicitor, your solicitor
 2 noticed the absence of those two things, and were you
 3 told to go back to the doctor?
 4 **A. Even though the Medical Justice, the lady who**
 5 **communicated with me that time, Theresa.**
 6 Q. Theresa?
 7 **A. Yes, and faxed the report to Theresa, and she said it's**
 8 **incomplete.**
 9 Q. Theresa at Medical Justice to whom you faxed the report
 10 said it was incomplete?
 11 **A. I've got it in my email.**
 12 Q. Don't worry. So you go back to -- did you go back to
 13 the doctor?
 14 **A. Yes, I did. I have to book again another appointment to**
 15 **see the doctor.**
 16 Q. One of the things that you recall Dr Chaudhary telling
 17 you was that the Home Office had told doctors not to
 18 complete those sections?
 19 **A. He told me that when I asked him.**
 20 Q. Do you remember how long after you went back to see him?
 21 **A. It taken me -- oh, perhaps a week, I don't know.**
 22 Q. A week. We have the rule 35 report. I see your
 23 reaction to hearing parts of it. Can I put it up on
 24 screen? But I'm not going to read it, unless --
 25 **A. Yes, please.**

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1 Q. You want me to put it up on screen?
 2 **A. But don't read it.**
 3 Q. But don't read it?
 4 **A. Yes, please.**
 5 Q. <HOM002582>. Chair, B/5. All I'm going to point out
 6 is, this is the report. It is a rule 35(3) report.
 7 We don't have to expand it, really. All I want to do is
 8 to go to one part. Chair, this can, of course, be
 9 published in full. I'm not going to ask the witness to
 10 look at it. But page 2 sets out what was said to
 11 Dr Chaudhary, in other words, his account. On page 4
 12 under section 5, "Physical signs of torture", if I can
 13 put it that way, and section 6 on page 5 said
 14 Dr Chaudhary, "His scars may be due to his account".
 15 It's signed and dated, if we look at page 6, 24 July by
 16 Dr Chaudhary. Let's take that down. All right. Was
 17 that quick enough? We went through it quickly.
 18 **A. That's fine.**
 19 Q. So that was the report. Then the very next day, there
 20 was a letter from the Home Office, <HOM002578>, B/6.
 21 I hope you don't mind if I read a few lines of this
 22 letter that you got. If we look at the top, it's to you
 23 at Brook House via solicitors. Those were your
 24 solicitors at the time, Gromyko Amedu. Is that where
 25 Puja came from?

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1 **A. No.**
 2 Q. This is somebody else, okay. So Brook House. The
 3 letter is from somebody with the name D Evans at
 4 Croydon. It is dated, we can see, 25 July. So it is
 5 the very next day after the rule 35 report was produced
 6 to you:
 7 "Dear ..."
 8 Your name is obviously given:
 9 "... I am writing to you to acknowledge receipt of
 10 a report dated 24 July provided by the medical
 11 practitioner at Brook House ... notifying us of
 12 a special illness or condition. Information contained
 13 within the report has been considered carefully and the
 14 decision to detain you has been reviewed."
 15 Then it sets out what you told the doctor. Let's go
 16 to the second page, please, at the top:
 17 "No body map has been provided with this report
 18 although the medical practitioner has noted the
 19 following."
 20 And the physical signs are there set out:
 21 "The medical practitioner has stated that your scars
 22 may be due to your account of assaults."
 23 Then before the next heading, please, those two
 24 lines:
 25 "Consequently, your detention has been reviewed and

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13 (Pages 49 to 52)

<p>1 the report considered when determining your suitability</p> <p>2 under the Adult at Risk policy."</p> <p>3 Then a number of immigration factors are set out.</p> <p>4 Page 3, please. "Balancing risk factors against</p> <p>5 immigration control factors":</p> <p>6 "Although it is accepted that you are an adult at</p> <p>7 risk, it should be noted that the medical practitioner</p> <p>8 has not indicated that a period of detention is likely</p> <p>9 to cause you harm."</p> <p>10 The author of the letter then goes through the basis</p> <p>11 of your place in this country and the basis of your stay</p> <p>12 in this country, and says at the bottom:</p> <p>13 "When balancing your indicators of vulnerability</p> <p>14 against the negative immigration factors above and the</p> <p>15 prospect of your removal is considered that the negative</p> <p>16 factors outweigh the risk in your particular</p> <p>17 circumstances."</p> <p>18 And so, for the reasons set out above, the author</p> <p>19 concludes, right at the bottom:</p> <p>20 "... it is considered that your detention remains</p> <p>21 lawful and appropriate in the particular circumstances</p> <p>22 of your case and in the absence of any other information</p> <p>23 to show detention to be inappropriate, you will remain</p> <p>24 detained."</p> <p>25 Can I just point out, chair -- I'm not going to go</p> <p style="text-align: center;">Page 53</p>	<p>1 will correct me if I am wrong. Chair, for your record,</p> <p>2 it's <HOM002564>. It's in your bundle at divider 13.</p> <p>3 The other thing he said, that had he had concerns</p> <p>4 about your continued detention, he would have said so,</p> <p>5 and the fact that what he called "no part C" was</p> <p>6 completed meant he had no concerns about your continued</p> <p>7 detention. Do you remember, now, him saying that in the</p> <p>8 course of his interview? Do you remember that?</p> <p>9 A. No.</p> <p>10 Q. He denies that he'd ever been told by the Home Office</p> <p>11 not to comment on the effects of detention. He said</p> <p>12 that was a matter for the Home Office and he said there</p> <p>13 was a blurred line, in effect, between his decision</p> <p>14 making and that of the Home Office.</p> <p>15 Let's go back to the PSU investigation report --</p> <p>16 yes, did you want to say something?</p> <p>17 A. I want to correct something there about the doctor.</p> <p>18 Q. Yes.</p> <p>19 A. When I went back to see, to ask him to correct -- to put</p> <p>20 the body map and the psychological effect, he refused to</p> <p>21 do that, saying that he told to do it the Home Office,</p> <p>22 and then I insisted. I say, I told you that you must to</p> <p>23 do that because my solicitor, Theresa, is -- he was so</p> <p>24 nervous --</p> <p>25 Q. He, Dr Chaudhary, was nervous?</p> <p style="text-align: center;">Page 55</p>
<p>1 back to the letter -- at page 2 -- I said we don't have</p> <p>2 to go back to the letter. In relation to your claim,</p> <p>3 the account was considered to meet the definition of</p> <p>4 torture as set out before in that letter, but it was</p> <p>5 accepted the evidence provided meets level 2 of</p> <p>6 the policy:</p> <p>7 "As such, you are regarded as an adult at risk under</p> <p>8 the policy."</p> <p>9 And level 2, chair, is that there is relevant</p> <p>10 professional evidence, for example, a medical report,</p> <p>11 social worker's report, confirming that the individual</p> <p>12 falls into one of the protected categories of persons at</p> <p>13 risk.</p> <p>14 THE CHAIR: Thank you.</p> <p>15 MR ALTMAN: I'm not going to take you through it because of</p> <p>16 the time involved, but you understand that Dr Chaudhary</p> <p>17 was also interviewed as part of the PSU investigation,</p> <p>18 and you've probably seen his interview; is that right?</p> <p>19 Do you remember seeing it.</p> <p>20 A. It might be.</p> <p>21 Q. One of the things he said is he didn't use body maps</p> <p>22 because he describes physical signs rather than body</p> <p>23 maps. Do you remember him saying that to the PSU?</p> <p>24 A. No.</p> <p>25 Q. Take it from me he did, though, and counsel behind me</p> <p style="text-align: center;">Page 54</p>	<p>1 A. Very nervous. I tried to tell him he didn't do his</p> <p>2 homework. So I was stand there, look at him. He was</p> <p>3 stand there look at me. He said that, "You know that</p> <p>4 I know you can cope".</p> <p>5 Q. Say that again? "You know that I know you can cope"?</p> <p>6 A. "You know that I know you can cope". I was in shock.</p> <p>7 I looked at him. The nurse who has -- I think it's</p> <p>8 Nana, she was there. She would go ahead and I feel</p> <p>9 so -- humility and then I am standing there for one or</p> <p>10 two minutes. He told me that, "You have to go", and</p> <p>11 then I walk out of the door and went back and that's the</p> <p>12 end of the story.</p> <p>13 Q. Thank you. Let's go back, please, to the PSU</p> <p>14 investigation report, <HOM002748>, this time at page 34.</p> <p>15 B/24.</p> <p>16 We see at 7.5 here is the allegation you made which</p> <p>17 the PSU investigated:</p> <p>18 "That Brook House officers informed the doctor not</p> <p>19 to complete ... rule 35 assessment fully."</p> <p>20 The first thing is, did you tell the doctor it was</p> <p>21 Brook House officers who told the doctor not to do it or</p> <p>22 it was the Home Office?</p> <p>23 A. I did.</p> <p>24 Q. Do you understand my question?</p> <p>25 A. I did tell the PCSU that the doctor told me that it's</p> <p style="text-align: center;">Page 56</p>

<p>1 Home Office who tell him not to do it.</p> <p>2 Q. That's my question. Why does allegation 5 read it was</p> <p>3 Brook House, not Home Office? Do you see what it says,</p> <p>4 "That Brook House officers informed the doctor not to</p> <p>5 complete ... rule 35". It doesn't say Home Office, does</p> <p>6 it?</p> <p>7 A. No.</p> <p>8 Q. There's a little more information we get, though, if we</p> <p>9 look at paragraph 7.5.1:</p> <p>10 "... said that on 28 July he had questioned [that's</p> <p>11 you] why the doctor completing his rule 35 assessment</p> <p>12 had not completed the body map and the impact detention</p> <p>13 was having on him and the likely impact of continued</p> <p>14 detention. He said initially that the doctor had told</p> <p>15 him that the Home Office had told him not to complete</p> <p>16 these sections but when pushed that the Home Office knew</p> <p>17 doctors had not completed body maps for over 12 months</p> <p>18 and he, the doctor, did not want to do the assessment on</p> <p>19 the effects of continued detention."</p> <p>20 If I may say, it's a particularly clumsily written</p> <p>21 paragraph. But at least there it accurately records</p> <p>22 that you had been talking about the Home Office; right?</p> <p>23 A. (Witness nods).</p> <p>24 Q. Let's, please, go to 7.5.9 on page 35, and the rest of</p> <p>25 that page:</p> <p style="text-align: right;">Page 57</p>	<p>1 put it and take the 'mystery' out of it all."</p> <p>2 Then it goes on to say:</p> <p>3 "The DSO [Detention Services Order] on rule 35 was</p> <p>4 very clear, as was the assessment form and instructions</p> <p>5 Dr Chaudhary had in front of him. It is acknowledged</p> <p>6 that Dr Chaudhary is making a number of these</p> <p>7 assessments daily and his reluctance about making</p> <p>8 a clinical assessment in case things changed, however,</p> <p>9 that should not detract from the importance of</p> <p>10 the process or the individual before him."</p> <p>11 Then the last two paragraphs under this section,</p> <p>12 please, 7.5.12 and 7.5.13:</p> <p>13 "Likewise, I was concerned that the caseowner had</p> <p>14 not queried the missing information and had just made</p> <p>15 her own assessment on an assumption that no impact</p> <p>16 stated meant there was no impact on continued</p> <p>17 detention."</p> <p>18 That's a reference, clearly, to the letter of</p> <p>19 25 July which I read out and which you had received:</p> <p>20 "These will be addressed in recommendations.</p> <p>21 "On the evidence and to a balance of probabilities,</p> <p>22 I find the allegation that Brook House officers informed</p> <p>23 the doctor not to complete his rule 35 assessment</p> <p>24 unsubstantiated. It was Dr Chaudhary who decided not to</p> <p>25 complete a body map and not to comment on the impact of</p> <p style="text-align: right;">Page 59</p>
<p>1 "The most concerning section was the assessment at</p> <p>2 section 6. This asked for Dr Chaudhary's reasoned</p> <p>3 assessment of why, on the basis of the detainee's</p> <p>4 account together with his own examination and clinical</p> <p>5 findings, he was concerned that the detainee may have</p> <p>6 been a victim of torture. There was a list of areas to</p> <p>7 address including 'impact detention is having on the</p> <p>8 detainee and why, including the likely impact of ongoing</p> <p>9 detention'. Dr Chaudhary chose not to address any of</p> <p>10 these. In terms of why he had objective grounds for his</p> <p>11 concern, he stated ..."</p> <p>12 Which is what we saw on the statement:</p> <p>13 "... 'his scars may be due to his account'. There</p> <p>14 was no assessment about the continued detention or</p> <p>15 anything else."</p> <p>16 Next paragraph. Can we just expand the last two</p> <p>17 paragraphs, please:</p> <p>18 "Dr Chaudhary said that the clarity about who made</p> <p>19 the decision about continued detention was a 'blurred</p> <p>20 line'. In his evidence he was quite clear that he did</p> <p>21 not feel that the decision about detention should be</p> <p>22 merely his and a clinical one. I was concerned ..."</p> <p>23 That's the investigator:</p> <p>24 "... about the lack of his comment being construed</p> <p>25 as an inference there was no concern. If so then just</p> <p style="text-align: right;">Page 58</p>	<p>1 continued detention and not Brook House officers or the</p> <p>2 Home Office as implied."</p> <p>3 Now, can you begin to understand why the author of</p> <p>4 this report seemed to think that you were talking about</p> <p>5 Brook House officers rather than the Home Office who had</p> <p>6 given this instruction to doctors? Do you understand</p> <p>7 that? Do you understand my question? It is a bit</p> <p>8 complicated. But the whole --</p> <p>9 A. That's meaning that -- each way, the decision has been</p> <p>10 taken by the doctor that you only -- you don't have to</p> <p>11 do it. What does it mean?</p> <p>12 Q. No, what I'm saying is, do you remember how we read that</p> <p>13 the PSU -- the author from the Professional Standards</p> <p>14 Unit, the author of this report, seems to be suggesting</p> <p>15 that what you were saying is that Dr Chaudhary has</p> <p>16 received his instruction from inside Brook House. But</p> <p>17 your allegation was that it was the Home Office</p> <p>18 instruction that doctors should not complete reports --</p> <p>19 A. Yes.</p> <p>20 Q. -- body maps or --</p> <p>21 A. That's the feedback from the doctor. What I asked him</p> <p>22 to do -- he said to me, it's the Home Office who told</p> <p>23 him not to do it.</p> <p>24 Q. Perhaps there's no point my asking you the question.</p> <p>25 All I'm asking you is whether you can understand why the</p> <p style="text-align: right;">Page 60</p>

<p>1 author of the report turned the Home Office into</p> <p>2 Brook House officers?</p> <p>3 A. No.</p> <p>4 Q. You don't understand. Okay. I hope it's clear what I'm</p> <p>5 asking. Right, more medical report entries, please.</p> <p>6 Let's see how we go. Back to <DL0000040>, please. We</p> <p>7 will begin at page 40 and work our way through some</p> <p>8 chronologies. Chair, it's divider 3, section B for you.</p> <p>9 We start with 28 July at page 40. Halfway down we find</p> <p>10 an entry 28 July 2017 at 15:20. Halfway down on the</p> <p>11 page but, as we have it up on the screen, it's the</p> <p>12 second entry:</p> <p>13 "Patient mentions depression ..."</p> <p>14 Here you are seeing Dr Chaudhary again:</p> <p>15 "... and sleeping problem and also has nightmares,</p> <p>16 would like to start mirtazepine, had this before.</p> <p>17 Explained will start and to review if not improving."</p> <p>18 Now, 28 July, you go to see Dr Chaudhary. Was this</p> <p>19 the occasion you went back and told him about the</p> <p>20 rule 35 report as well, or was that another occasion?</p> <p>21 A. I don't remember.</p> <p>22 Q. You understand what I'm saying?</p> <p>23 A. Yes, yes.</p> <p>24 Q. You remember you went back to see him because it's what</p> <p>25 Medical Justice told you to do and you said,</p> <p style="text-align: right;">Page 61</p>	<p>1 his sleep at night.</p> <p>2 "Mental health assessment -- States he has never</p> <p>3 been treated by any mental health team in the past,</p> <p>4 however said that his GP prescribed him [something] from</p> <p>5 2010 to 2011. Cannot remember the dose but says he</p> <p>6 stopped taking it when he felt better."</p> <p>7 So there's information there about your mental</p> <p>8 health. Then, please, on page 37, 14 August, right at</p> <p>9 the bottom, 12:01. This is an entry we saw before, you</p> <p>10 will remember, about the emotional health group and how</p> <p>11 stress was affecting you and so on. Let's move on,</p> <p>12 then, please, to page 36 for an entry on 21 August at</p> <p>13 12:06. You see the occupational therapist:</p> <p>14 "Engaged with the group today. Said that he</p> <p>15 experienced flashbacks during the day. That his</p> <p>16 night-time medication helped him to sleep but when he</p> <p>17 woke up in the cell he experienced flashbacks related to</p> <p>18 when he was imprisoned and tortured. He copes with this</p> <p>19 by leaving his cell during the day and spending time in</p> <p>20 the central areas. Took part in the breathing</p> <p>21 exercise."</p> <p>22 Then on the same day -- not the same day. I was</p> <p>23 going to ask you about suicidal thoughts. I would like,</p> <p>24 please, to look at page 37 again. This is 12 August,</p> <p>25 I think. At 13:12, you see Karen Churcher, a mental</p> <p style="text-align: right;">Page 63</p>
<p>1 "Dr Chaudhary, this report is incomplete". What I'm</p> <p>2 asking is whether it is this occasion or another</p> <p>3 occasion?</p> <p>4 A. I'm not sure 100 per cent. It might be.</p> <p>5 Q. You're not sure. It might be this one. Please, if we</p> <p>6 stay on the same page, 29 July at 10:59, this time</p> <p>7 you're seeing Sheila Trower, a staff nurse:</p> <p>8 "For more than two weeks unable to sleep has</p> <p>9 flashback of being tortured back home by police, started</p> <p>10 mirtazepine this morning and has appointment with</p> <p>11 relaxation group. Informed to keep appointments. Plan:</p> <p>12 would like to see doctor appointment booked to see</p> <p>13 mental health nurse informed medication needs time to</p> <p>14 work."</p> <p>15 So that's 29 July. Then if we go to page 39 for</p> <p>16 6 August, at 16:22, so the entry at the bottom, please.</p> <p>17 You see James Newlands the mental health nurse then on</p> <p>18 6 August. You give him some background about you and</p> <p>19 your family:</p> <p>20 "Informs me that his problem of feeling stressed and</p> <p>21 anxious has started again now that he has been held here</p> <p>22 in detention. States this brings back memories of when</p> <p>23 he was arrested and held in prison ..."</p> <p>24 I think we looked at this a little before:</p> <p>25 "... causing him to have flashbacks which disturb</p> <p style="text-align: right;">Page 62</p>	<p>1 health nurse, so we have gone slightly back in time.</p> <p>2 This is about thoughts of suicide. At the bottom of</p> <p>3 that entry:</p> <p>4 "States he sometimes has fleeting thoughts of ending</p> <p>5 his life but does not have any plan and thoughts pass.</p> <p>6 Angry with the way Home Office treat him."</p> <p>7 Did you have these thoughts from time to time? Did</p> <p>8 you have these thoughts from time to time?</p> <p>9 A. Yes.</p> <p>10 Q. You did. Then on 6 September, please, at page 35, right</p> <p>11 at the bottom, you are seen by Dr Chaudhary again:</p> <p>12 "Patient reviewed, mentions mirtazepine helping but</p> <p>13 would like us to increase the dose ... done this. To</p> <p>14 review progress, patient mentions has been helped by the</p> <p>15 medications but recently plateaued."</p> <p>16 That medication, what did it do for you, that</p> <p>17 medication?</p> <p>18 A. It's trying to balance my mental health.</p> <p>19 Q. Your?</p> <p>20 A. My mental health, my depression.</p> <p>21 Q. On 6 September, you got removal directions, did you?</p> <p>22 A. Yes.</p> <p>23 Q. Had your depression worsened when you got the removal</p> <p>24 directions?</p> <p>25 A. More than worse.</p> <p style="text-align: right;">Page 64</p>

<p>1 Q. More than worse. On the next day, the 7th, if we look 2 at the top of page 34, please, 7 September, do you see 3 a healthcare assistant by the name of 4 Nana Dankwaa-Akowuah was called at 5.30 by a wing 5 officer because detainee C/O complaining of abdominal 6 pain on examination. So you've got all of 7 the examination entries there: 8 "Patient advises he's had this pain since yesterday 9 evening ..." 10 And you were advised paracetamol for analgesia and 11 to attend the clinic at 9.30. 12 There's another entry at 5.51 which continued from 13 the entry earlier at 5.37, and then at 11.47, you see 14 another staff nurse: 15 "11.49 came in complaining of stomachache but not 16 happy to wait till next week. Was advised to take 17 paracetamol but claimed he is taking. When checked on 18 records nothing was taken. An appointment to see m/o 19 [medical orderly, perhaps] and a slip been given. Not 20 happy to wait for next week was expecting for one 21 appointment for headache and another for his bellyache 22 which I explained that he should [explain] everything to 23 m/o." 24 Then we see on 8 September you were referred to the 25 GP. What was the stomachache problem about? What</p> <p style="text-align: center;">Page 65</p>	<p>1 A. Yes. 2 Q. And now this is 7 September? 3 A. Yes. 4 Q. What was the problem with the same nurse? 5 A. The first incident, I get in on the healthcare. As soon 6 as I get in, she come out of -- from her office, asked 7 me the reason why I'm here in front of four other 8 detainees. 9 Q. So there were other detainees waiting for healthcare? 10 A. Yes. 11 Q. So this nurse -- this is in September, or July you're 12 talking about? 13 A. July. 14 Q. She comes out and says, "Why are you here?", in front of 15 other detained men? 16 A. Yes. 17 Q. And, what, she wanted you to explain your personal 18 problems in front of other people? 19 A. Exactly. Firstly, it's the way she asked me, she was so 20 aggressive way to ask me. 21 Q. Yes. 22 A. And I felt very uncomfortable to explain in front of the 23 other detainees why am I here. So I replied that it's 24 rude and inappropriate to ask me. 25 Q. It's not appropriate. And did you say that she was</p> <p style="text-align: center;">Page 67</p>
<p>1 brought that on, do you think? 2 A. It was because ... 3 Q. I can't hear you. Come closer to the microphone. 4 A. It's because on the -- the letter received concerning my 5 deportation. 6 Q. The removal directions? 7 A. Yes. 8 Q. 7 September, let me ask you something about that, 9 please. I wonder if we can put up on screen a different 10 document, please, for the moment. You were someone who 11 made lots of notes about your treatment, and I just want 12 to show you one <DL000156> at page 2. Right at the top, 13 the second entry: 14 "D/ Abused by a nurse this the healthcare." 15 Do you see that? 16 A. Yes. 17 Q. Did that relate, at least in part, to 7 September? Was 18 there a problem you had with the nurse on 7 September? 19 We have just looked at a couple of entries where you 20 attended healthcare? 21 A. Yes. 22 Q. What was the problem on the 7th? 23 A. The same nurse on two incidents. 24 Q. Let me pause there. There was an incident in July 25 sometime?</p> <p style="text-align: center;">Page 66</p>	<p>1 rude? 2 A. I said, "It's so rude to ask me that". And then she 3 moved to one of the detainees to ask, again, the same 4 question she asked me. 5 Q. Of him, of another man? 6 A. Another man. 7 Q. Okay. 8 A. And then all detainees, around four or seven, started to 9 tell her that she's wrong. She went back in her office 10 and another colleague comes. 11 Q. Colleague, yes. 12 A. To try to settle things down. 13 Q. So that was July? 14 A. Yes. 15 Q. If we go back to the medical records, please, 16 <DL0000040> at page 34, and if we look at the entry for 17 11.47 on 7 September, so about the fifth entry down, the 18 nurse I think you're complaining about is 19 Mrs Nombulelo Sihlali. Is that the one? 20 A. That is where -- African lady. 21 Q. I don't know. I don't know her. 22 A. She's not African. 23 Q. Did you think that was the woman? 24 A. That nurse, she came after the first one. The first one 25 is the same one who July --</p> <p style="text-align: center;">Page 68</p>

<p>1 Q. Are you saying -- forgive me. Let's look at the earlier 2 entry, for 7 September, then. Do you remember the name 3 I first tried reading out, Nana Dankwaa. Is that the 4 one? 5 A. No. 6 Q. That's not her either? 7 A. It's another lady. 8 Q. Not either of those two? 9 A. No. 10 Q. What happened on 7 September? 11 A. I didn't sleep. Let me explain, please, because hard to 12 work out all my feelings to deal with, please, I appeal 13 to you to accept the fact. And I didn't sleep all the 14 night at that day because I'm under hard stress, so on 15 the early morning when I get out, they open our 16 cell 8 o'clock, I went straight away out to get the 17 fresh air to deal, and then I came back. At 9 o'clock 18 I went straight away to the healthcare. They are not 19 yet ready to take any patient. So I went back to my 20 room and tried to be calm, de-stress. I went back again 21 at 10.30, before 11 o'clock. When I arrived there, the 22 door was closed. They have got some detainees inside 23 the healthcare. So I banged the door. The same nurse 24 who have a problem with me, she came and she said, "The 25 healthcare is full. You're not having appointment". So</p> <p style="text-align: center;">Page 69</p>	<p>1 detainees." 2 The reason I ask you about that particular nurse, 3 Sihlali, is, if we read the next paragraph: 4 "Whilst the member of healthcare staff described by 5 [you] has not been identified, significant checks have 6 been made with a nurse who was present on 7 September 7 ... Nurse Sihlali. This was to check the process for 8 detainees accessing the nurse clinic ..." 9 But you say it wasn't her at all, it was somebody 10 else? 11 A. Because there were two nurses, Nana, the nurse, the 12 African lady, the one who you don't quite got -- she 13 is -- she is not European, she is not African. 14 Q. But you're saying that wasn't her. Sihlali was the 15 wrong one? 16 A. I didn't say that. 17 Q. When we looked at the medical records, you did. I asked 18 you whether it was Nurse Dankwaa or Sihlali and you said 19 not Sihlali? 20 A. Sihlali -- what is her background? 21 Q. I was asking if that was the nurse you were complaining 22 about, Sihlali? 23 A. I want to know, firstly, what kind of background is 24 Sihlali? 25 Q. I can't tell you, I don't know.</p> <p style="text-align: center;">Page 71</p>
<p>1 I said, "It's no time. I'm not late". She said she 2 cannot let me in. She walk away back without assist me. 3 So to (inaudible) I carry on to bang the door and 4 then that second lady, she came, she opened the door, 5 she didn't let me in. She stand in front of the door 6 and she talking to me, "What do you want?" So 7 I explained my -- the problem I have the day before, 8 because they knew about that, I have early morning court 9 at 5 o' clock. She said, "Okay, we can give you 10 paracetamol, so take your paracetamol". I was stand on 11 the door not knowing why they don't let me in because 12 I'm still on time and nothing to do. I went back to see 13 the security there to have the paracetamol and, 14 surprisingly, when I see them, it's like I came late and 15 for that they didn't receive me. Someone didn't sleep 16 all the night. How can I come late that important 17 appointment? 18 Q. Thank you. Let's look, then, at what happened with the 19 investigation report. Back to <HOM002748> at page 36. 20 If we look at allegation 6, and if we expand that part 21 of the page all the way below, please: 22 "That on 14 July and 7 September a nurse in 23 healthcare had allegedly been rude to [you] denying 24 [you] access when the waiting room was not full and 25 asking [you] to reveal medical details in front of other</p> <p style="text-align: center;">Page 70</p>	<p>1 A. Because the person I have a problem, she is not African, 2 she is not European. She is Asian. East Asian or ... 3 Q. All right. It may not matter very much. All I want to 4 show you is the final paragraph at page 37 going into 5 38, that on the evidence, right at the bottom: 6 "On the evidence and to a balance of probabilities, 7 I find the allegation that on 17 July ..." 8 Which is curious, because it was the 14th: 9 "... and 7 September ... a nurse in healthcare had 10 been rude to [you] denying [you] access when the waiting 11 room was not full and asking [you] to reveal medical 12 details in front of other detainees unsubstantiated." 13 So that was the outcome of that and we have the rest 14 of the report to see on what basis the investigator came 15 to that conclusion. 16 Then can we look back to the medical records, 17 please, <DL0000040> at page 32. It is something we 18 looked at a little earlier, but just to remind us, 19 picking up the chronology, right at the top, the second 20 entry. At 11.29, you went to see another mental health 21 nurse, Skeete Jitta: 22 "Seen by triage nurse ... -- seen in clinic spoke 23 about feeling anxious especially at night when the rooms 24 are locked, spoke about stomach issues and waking when 25 he hears the noise outside.</p> <p style="text-align: center;">Page 72</p>

<p>1 "Overview notes ... -- suggested [to you that your] 2 issues could be anxiety related to being locked, 3 suggested that he could consider asking for a transfer 4 to Tinsley House ..."</p> <p>5 You will remember we looked at that a little 6 earlier. Now let me ask you about a number of other 7 issues, please. Your treatment by staff at Brook House. 8 You made a complaint about your treatment on 9 28 and 29 June. To remind ourselves, this is when you 10 had left the Verne and returned to Brook House; is that 11 right?</p> <p>12 A. Yes.</p> <p>13 Q. This was the day, you will remember, the 29th, when the 14 removal directions were going to be put in effect. Do 15 you remember you were taken to Gatwick and you arrived 16 there at 12.00 o'clock, midday, but you managed to call 17 your solicitor at about 3.00 o'clock in the afternoon to 18 say you shouldn't be removed. Do you remember that?</p> <p>19 A. Yes.</p> <p>20 Q. Was there a guard, an officer, at Brook House by the 21 name of Tomsett? Do you remember him?</p> <p>22 A. Yes.</p> <p>23 Q. Did you have a complaint about Mr Tomsett? What was 24 your complaint about him? Do you remember what your 25 complaint was?</p> <p style="text-align: right;">Page 73</p>	<p>1 So at least it was accepted that both of you were on 2 B wing at the time. At 7.1.3, in the second part of 3 the paragraph, you asking Tomsett to wait a minute given 4 the timescales could have escalated the situation to the 5 point that Tomsett felt he had to be direct to encourage 6 compliance. So it doesn't particularly seem that any 7 particular finding was made about him, but the rest of 8 the allegation, unless I have missed something, was, as 9 we see, unsubstantiated. Then there was an allegation 10 you make --</p> <p>11 THE CHAIR: Did you want to say something?</p> <p>12 A. I would like to come back to on 7 September for my way 13 back to the detention on the 29th about the officer who 14 mocked me on the reception, about Darren Tomsett, what 15 is said that day on the early morning, to have a proof 16 of all that situation. When I have my interview on the 17 26th or 27th with the PSU --</p> <p>18 Q. 20 December.</p> <p>19 A. 20 December in Croydon. When I make that complaint to 20 her, she asked me the question that what is -- where is 21 your proof to make my accusation very accurate. I told 22 her, you still have the CCTV on the detention centre 23 because my first day in the detention centre, when you 24 make the induction, you tell us that any abuse, any 25 physical threat, any aggression to any member of staff</p> <p style="text-align: right;">Page 75</p>
<p>1 A. On that day?</p> <p>2 Q. On that day. Let me see if we can remind you by going 3 back to the PSU report then. There are other documents 4 but I'm not going to take you to them, just to save 5 a little time. But if we go back to <HOM002748>, 6 please, at page 27. This was your allegation number 1. 7 If we can just look at the allegation:</p> <p>8 "That on 29 June, prior to leaving [your] room, DCM 9 Tomsett was rude to [you] saying, 'pack your stuff and 10 get out!'. [You were] later mocked by G4S officers when 11 [you] returned to Brook House ... following the 12 removal."</p> <p>13 Is that the complaint?</p> <p>14 A. (Witness nods).</p> <p>15 Q. Yes? If we look at the next page, page 28, again on the 16 evidence, the investigator did not find you were mocked 17 when you returned following the failed removal, and that 18 allegation was unsubstantiated. If we want to know what 19 happened to -- what you said about Tomsett, if we go 20 back to page 27, at paragraph 7.1.1:</p> <p>21 "... Tomsett could not recall this incident. The 22 roster showed that he had been a wing officer on the 23 induction wing on 29 June. He said that [you] would 24 have remained on B wing in readiness for [your] 25 removal."</p> <p style="text-align: right;">Page 74</p>	<p>1 will be -- any detainees who do that will be prosecuted 2 and go to the prison. So I told her, the CCTV is 3 working there, so it will be better for you to get back 4 to check the CCTV, start from the healthcare. You will 5 see what happened on 7 September, you will see what 6 happened in July and you will see when my way back to 7 the detention, and then you got to fill the truth, tell 8 if true or not. She told me that the CCTV had been 9 deleted, so I said to delete the CCTV in one important 10 place is -- it might be last maybe six months or a year 11 before they delete. She said -- whatever -- I say that 12 it's not serious because, if you take things seriously 13 about a building that's in detention, you have to have 14 a CCTV accurate, on time, in case if someone -- somebody 15 dies or somebody is attacked physically. It's obvious 16 proof who will tell themselves the truth.</p> <p>17 What I say -- what is said, he said, I said. So it 18 only takes to confirm the truth is the CCTV. You are 19 sit down there and you tell me the CCTV is not working, 20 and I understand why she didn't give me one copy of the 21 audio I asked for, because if I have the copy of 22 the audio, my solicitor, Frankie, who is sit down there, 23 will listen and she would know a lot of pieces have been 24 missing deliberately, I can say that. She didn't 25 deliver me a copy of the audio because she knew what she</p> <p style="text-align: right;">Page 76</p>

<p>1 got to do.</p> <p>2 Right now, we are seeing down there inconsistently,</p> <p>3 because it's what I say, is it because of what we</p> <p>4 (inaudible) say, is because of what G4S say? So say,</p> <p>5 say, say. Who is telling the truth? The only things to</p> <p>6 properly be true will be the CCTV, but you don't have</p> <p>7 the CCTV. She didn't give the audio to listen. She</p> <p>8 write what she want to write. It is up to her to write</p> <p>9 but I don't agree with what the PSU did. If she was</p> <p>10 right to write the law to save the law, she should</p> <p>11 provide the CCTV. So it's that update I want to make.</p> <p>12 Thank you very much.</p> <p>13 Q. You have made that clear, thank you. 14 August. I am</p> <p>14 going to deal with this briefly. Did you have</p> <p>15 a complaint that another detainee threw a bucket of</p> <p>16 water over you and a roommate?</p> <p>17 A. Yes.</p> <p>18 Q. You went to the wing office. You remembered complaining</p> <p>19 to Joe Bryant, the wing officer?</p> <p>20 A. I don't remember the name but I did have a complaint to</p> <p>21 the security office at that time.</p> <p>22 Q. But the core of your complaint was the detained person</p> <p>23 wasn't disciplined and no assurances were given to you</p> <p>24 about your safety?</p> <p>25 A. Exactly.</p> <p style="text-align: center;">Page 77</p>	<p>1 abused, you remember, by another detained person, an</p> <p>2 Albanian. He tried to attack you. An officer calmed it</p> <p>3 down. You say you didn't complain in writing but you</p> <p>4 did make a verbal complaint; yes? Is that right?</p> <p>5 A. It's right because the different officer who witnessed</p> <p>6 the event, his name is Bemba(?), and I was away for</p> <p>7 [redacted] and then people were shouting because there</p> <p>8 are really a lot of noises --</p> <p>9 MR ALTMAN: Just pause. Chair, I'm going to ask you, if we</p> <p>10 have got the live stream going, just to pause the live</p> <p>11 stream for a couple of minutes, because Mr Livingston</p> <p>12 thinks -- and I heard it. I thought he was referring to</p> <p>13 a staff member, but Mr Livingston thinks he was</p> <p>14 referring to a detained person and, if he was, we will</p> <p>15 have to break the link for a moment, just for a few</p> <p>16 minutes. It is covered by the restriction order, of</p> <p>17 course, and, if needs be, there can be a further</p> <p>18 restriction order in relation to the name that the</p> <p>19 gentleman just mentioned.</p> <p>20 It is not your fault, but you will remember we are</p> <p>21 not naming any of the detained men.</p> <p>22 A. Yes, sorry.</p> <p>23 Q. Don't apologise. It's easily done.</p> <p>24 The fact remains that you made a verbal complaint</p> <p>25 and nothing was done about it. Is that the point?</p> <p style="text-align: center;">Page 79</p>
<p>1 Q. You remembered eating in your room afterwards for two or</p> <p>2 three days because you felt unsafe?</p> <p>3 A. Two days.</p> <p>4 Q. Three days?</p> <p>5 A. Two, two.</p> <p>6 Q. Two. If we are still in the PSU investigation report,</p> <p>7 this is your second allegation. If we go to page 28,</p> <p>8 please. We see there allegation 2, that on 12 August,</p> <p>9 a detained person threw a bucket of water over you and</p> <p>10 a friend, which you reported to G4S but no action was</p> <p>11 taken. If we go to page 30 to see what the outcome was,</p> <p>12 at 7.2.13:</p> <p>13 "On the evidence (or in this case lack of it) ...</p> <p>14 I find that the complaint allegation that a fellow</p> <p>15 detainee threw a bucket of water on [you and a] friend</p> <p>16 which [you] reported to a G4S officer but no action was</p> <p>17 taken substantiated. There was no written record of</p> <p>18 the event, how it was dealt with or how the complaint</p> <p>19 was responded to, suggesting the complaint was not</p> <p>20 responded to."</p> <p>21 So that's one of the substantiated ones. Then in</p> <p>22 relation to 17 or 18 August, you will remember that</p> <p>23 something happened on a staircase; yes?</p> <p>24 A. (Witness nods).</p> <p>25 Q. You were going to church to pray, you were shoved and</p> <p style="text-align: center;">Page 78</p>	<p>1 A. Yes.</p> <p>2 Q. Let's have a look at what happened, as far as the PSU is</p> <p>3 concerned. If we are in that document, we are, at the</p> <p>4 bottom of the page, page 30, at 7.3, your allegation</p> <p>5 was, allegation 3:</p> <p>6 "That on 17 or 18 August [you were] allegedly</p> <p>7 assaulted by a detainee on D wing staircase which [you]</p> <p>8 reported to a G4S officer but no action was taken."</p> <p>9 Halfway down the next page, at 7.3.4, this</p> <p>10 allegation we will see was unsubstantiated. The</p> <p>11 investigator said:</p> <p>12 "Without anything more and on the evidence ...</p> <p>13 I find the allegation that on 17 or 18 August ... [you</p> <p>14 were] assaulted by a fellow detainee on the staircase,</p> <p>15 which [you] reported ... but no action was taken ..."</p> <p>16 For some obscure reason, that was an unsubstantiated</p> <p>17 allegation. Yes, what did you want to say?</p> <p>18 A. For all detainees or people who work on Brook House,</p> <p>19 between -- on the stairs they have the CCTV. So here we</p> <p>20 have no CCTV. If you can come back, you would see, "I</p> <p>21 saw no CCTV".</p> <p>22 Q. She says that at the bottom of page 30, that there was</p> <p>23 no CCTV?</p> <p>24 A. They have CCTV on the stairs.</p> <p>25 Q. So you're saying, if it was a proper investigation, they</p> <p style="text-align: center;">Page 80</p>

1 should have got the CCTV?

2 **A. That's the one. The second one is that being abused**

3 **and -- the event did happen. I mean that I been pulling**

4 **down the stairs by an Albania --**

5 Q. By an Albanian?

6 **A. -- prisoner coming from prison. There have been four of**

7 **them. So that's an event happening.**

8 Q. I'm sorry, I don't understand.

9 **A. I mean that, on that day, the situation that the PCLU**

10 **say is unsubstantiated, doesn't mean that it's not clear**

11 **at all. It's not true.**

12 Q. Well --

13 **A. If I get it.**

14 Q. Well, that's a question that we will have to consider,

15 but it simply says the allegation is unsubstantiated.

16 It doesn't necessarily say it's not true. Your

17 allegation was, "I was bullied and G4S took no action".

18 That's the allegation, that G4S took no action, not

19 whether you were bullied, I suspect?

20 **A. Further there, she said we don't have CCTV on the**

21 **stairs. I confirmed they got the CCTV on the stairs.**

22 **So why I don't get it, why she said we don't have CCTV**

23 **on the stairs, rather than say we have got the CCTV on**

24 **the stairs.**

25 Q. I can't answer that.

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1 **A. Okay.**

2 Q. You have made your point.

3 **A. This is fair enough.**

4 MR ALTMAN: You have made your point. Then there's an

5 incident -- chair, I see the time. Perhaps we can just

6 deal with one more. Then it will be time for a break?

7 THE CHAIR: Are you okay to deal with one more question

8 before we take a break?

9 **A. Yes, I'm fine.**

10 MR ALTMAN: 18 August. There was an issue about a friend

11 with a T-shirt; do you remember? A Barcelona T-shirt.

12 **A. Yes, it's my cellmate.**

13 Q. Was that taken from your cellmate and it was worn by the

14 person who took it the next day?

15 **A. Yes.**

16 Q. Was there a fight between a guard and a friend and

17 either the T-shirt was pulled or the guard grabbed the

18 person by the neck? Do you remember?

19 **A. I remember. But let me tell you what happened exactly.**

20 **The guards on the first step didn't be involved. It was**

21 **the thief and my cellmate they argued.**

22 Q. The thief and the cellmate were arguing?

23 **A. Arguing. Then the thief went aggressive, he assault --**

24 Q. The thief?

25 **A. Yes, he assault my cellmate. So in self-defence, my**

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1 **cellmate tried to defend himself. And then the security**

2 **guard jumped --**

3 Q. Your cellmate?

4 **A. Yes.**

5 Q. And not the thief?

6 **A. Yes.**

7 Q. Can I just ask you this, because it's been pointed out

8 on behalf of G4S that you have said slightly different

9 things about what happened, and although none of this is

10 going to be terribly important, I'm going to ask you

11 anyway. When you made a statement on 12 October 2017 --

12 do you remember about that witness statement? You said

13 that it had been the T-shirt which the guard had pulled.

14 When you spoke to the PSU on 20 December, you only

15 mentioned the neck, that the security guard had taken

16 the person, your roommate, by the neck. But when you

17 came to make your witness statement to the inquiry, in

18 your second annex to it, you mentioned both the T-shirt

19 and the neck. Can you remember which it was? Did the

20 guard have the T-shirt? Did he get hold of the neck?

21 Or did he get hold of both?

22 **A. He grabbed hold the T-shirt to my cellmate. The fight**

23 **is breaking. They start to fight it.**

24 Q. Yes.

25 **A. They then move on the next step to his neck.**

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1 Q. You're demonstrating like a stranglehold?

2 **A. Yes, that's when everybody get involved.**

3 Q. So it was both the T-shirt and then the neck?

4 **A. Yes.**

5 MR ALTMAN: Thank you. Chair, that might be a good time to

6 have our short afternoon break. Can I suggest we come

7 back and be ready to start at about 3.30 pm?

8 THE CHAIR: Yes, thank you.

9 (3.18 pm)

10 (A short break)

11 (3.39 pm)

12 MR ALTMAN: Let me ask you, please, about 24 August. On

13 that occasion, you were to receive a visit from your

14 brother. Do you remember?

15 **A. Yes.**

16 Q. Do you remember Darren Tomsett -- this is what you

17 allege -- told you to "Come here" aggressively, and he

18 searched you aggressively and you felt abused and

19 humiliated by him?

20 **A. Yes.**

21 Q. Do you remember that? When you challenged him, he said,

22 "Shut up. I'm just doing my job"?

23 **A. Yes.**

24 Q. It was witnessed by another detained man?

25 **A. Yes.**

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21 (Pages 81 to 84)

<p>1 Q. Did a woman officer say she would speak to her manager?</p> <p>2 A. Yes.</p> <p>3 Q. Did she?</p> <p>4 A. I don't know.</p> <p>5 Q. You don't know. You made a note of this. If we look</p> <p>6 very briefly at a document we looked at earlier,</p> <p>7 <DL0000156>, page 2, we see by letter F:</p> <p>8 "24 August", written in French:</p> <p>9 "Abused again by Darren in the visitor corridor."</p> <p>10 Yes? The PSU finding -- let's briefly look at that,</p> <p>11 <HOM00002748>, page 31, this is your fourth allegation</p> <p>12 that the PSU looked at. Allegation 4:</p> <p>13 "That on 24 August prior to a visit from his brother</p> <p>14 [you were] allegedly 'frisked extremely aggressively' by</p> <p>15 DCM Darren Tomsett and this intimidated [you]."</p> <p>16 Again, before you make the point, no CCTV is what's</p> <p>17 being said here. Then we go to the foot of page 33:</p> <p>18 "Based on the evidence ... I was satisfied that even</p> <p>19 if DCM Tomsett has been present on visits and conducted</p> <p>20 the level A rubdown search which I have already</p> <p>21 expressed doubt about, then the search that he described</p> <p>22 to me was the level A rub search required for all</p> <p>23 visits. It was not as described by [you]. I have also</p> <p>24 taken into account [your] intense dislike of being asked</p> <p>25 to submit to a search, as I witnessed this first hand</p> <p style="text-align: center;">Page 85</p>	<p>1 that was one allegation that was substantiated, and the</p> <p>2 reasoning is given in the intervening paragraphs, and</p> <p>3 that can all be read when the document is published.</p> <p>4 Further allegations you made in September,</p> <p>5 26 or 27 September, is you had returned to your room,</p> <p>6 having been to church, and you found your room was in</p> <p>7 a mess when you got back there. You spoke to a wing</p> <p>8 manager. Security told you that they saw who did it,</p> <p>9 and you say you returned to security three times that</p> <p>10 day. You complained verbally about it but you received</p> <p>11 no reassurance and there was no sanction for the</p> <p>12 behaviour. You were worried about legal papers going</p> <p>13 missing, and I think you reported some items had been</p> <p>14 taken from your room as well; is that correct?</p> <p>15 A. Correct.</p> <p>16 Q. Again, if we are in the PSU investigation report, can we</p> <p>17 go to page 40, please, for allegation 9 -- let me just</p> <p>18 finish and then you can ask your question.</p> <p>19 At 7.9, here was the allegation that on</p> <p>20 the 26th or 27th, items were stolen from your room in</p> <p>21 your absence. When you spoke to the wing manager, you</p> <p>22 were told an investigation would take place. Nothing</p> <p>23 happened and you felt angry that the behaviour had been</p> <p>24 sanctioned and you received no reassurance that that</p> <p>25 would not happen again and this allegation was</p> <p style="text-align: center;">Page 87</p>
<p>1 when I interviewed him at Lunar House. Whilst it is</p> <p>2 acknowledged that the search process could be found</p> <p>3 distressing to persons unused to this, such as you, it</p> <p>4 is necessary for the safe and secure running of</p> <p>5 the centre. Not least given the opportunity for drugs</p> <p>6 and other items being passed during visits. The</p> <p>7 allegation that on 20 August" -- note it was the 24th</p> <p>8 -- "[you were] 'frisked extremely aggressively' by</p> <p>9 DCM Darren Tomsett is unsubstantiated."</p> <p>10 So that was the outcome of that particular</p> <p>11 allegation. You then complained on 13 September, or in</p> <p>12 relation to an incident on 13 September, that you were</p> <p>13 spoken to rudely by a security officer, Bonnie Spark,</p> <p>14 when you were on the phone to your solicitor. You say</p> <p>15 that you had no signal for your phone, it was lock-up</p> <p>16 time and you were told to get back into your room. Is</p> <p>17 that right? Do you remember? Bonnie Spark? And the</p> <p>18 allegation is allegation 7 which we find on page 38 of</p> <p>19 the document which is up on screen:</p> <p>20 "That on 13 September ... [you were] allegedly</p> <p>21 spoken to very rudely by DCO Bonnie Spark during the</p> <p>22 lock-up for the evening mealtime."</p> <p>23 That one, if we look at page 39, was substantiated.</p> <p>24 She should have handled the situation more</p> <p>25 professionally and used the tools available to her. So</p> <p style="text-align: center;">Page 86</p>	<p>1 substantiated. So that's another of the four that were</p> <p>2 substantiated. What did you want to say?</p> <p>3 A. I would like to come back to -- about Darren Tomsett.</p> <p>4 Q. Yes.</p> <p>5 A. About what happened that day.</p> <p>6 Q. Which day? When your brother visited?</p> <p>7 A. Yes.</p> <p>8 Q. Go on then. Tell us.</p> <p>9 A. They still have CCTV on the corridor, and that's not</p> <p>10 true to say there was no CCTV. They have CCTV. If G4S</p> <p>11 staff -- someone can confirm that. They do have CCTV.</p> <p>12 And then I will come back on 20 December with the SPU,</p> <p>13 the lady who done the interview. She saw -- she showed</p> <p>14 me the picture of Darren Tomsett and I confirmed it's</p> <p>15 him the one. She told me that she received a lot of</p> <p>16 complaints about him. So I asked, "What have you done</p> <p>17 with the complaints?" She told me, she replied that he</p> <p>18 had been sacked because of his wrongdoing to detainees.</p> <p>19 I told her that, "If you have been sacked -- it's only</p> <p>20 by being sacked?", and she say "Yes". I say, "But he</p> <p>21 broke the law. If he broke the law, sacking is not</p> <p>22 something -- is not enough, because he done a lot of</p> <p>23 wrongdoing to detainees, he abused detainees.</p> <p>24 Sometimes, I'm sorry to say, all detainees at that time</p> <p>25 agree, even me, he's racist. And all the detainees,</p> <p style="text-align: center;">Page 88</p>

<p>1 they talk about that. And then he has wrongdoing, they</p> <p>2 sack him. Then she make the report there, you saw there</p> <p>3 it's unsubstantiated. So I still struggle with this</p> <p>4 word. I don't get it. Why I don't get it, what does it</p> <p>5 mean? Because it is, like, I don't know if it's true or</p> <p>6 it's no way to be -- a lot of ways to be true.</p> <p>7 Q. Repeat that, please, I didn't understand it. You don't</p> <p>8 know if it's true or --</p> <p>9 A. It is false.</p> <p>10 Q. It is false, yes, sir. What you're saying is, you</p> <p>11 struggle with the word "unsubstantiated", what that</p> <p>12 means?</p> <p>13 A. Yes.</p> <p>14 Q. Well, we know what you say, and that's something that we</p> <p>15 will discover.</p> <p>16 A. Thanks.</p> <p>17 Q. There was a further allegation you made in relation to</p> <p>18 a use of force on 27 September, not on you but on</p> <p>19 a friend of yours from Nigeria who was on removal</p> <p>20 directions, and do you remember you heard fighting to</p> <p>21 remove him? He wasn't your roommate.</p> <p>22 As far as you know, he was beaten and he was removed</p> <p>23 from his room naked. Is that correct? Is that right?</p> <p>24 A. (Witness nods).</p> <p>25 Q. I'm not going to ask you any more about that then.</p> <p style="text-align: center;">Page 89</p>	<p>1 came at me aggressively. He told me, "Take your stuff,</p> <p>2 get out". I tried to tell him that his colleague --</p> <p>3 a lady came before him, she told me to get ready, she</p> <p>4 would come to pick me up. So I tried to tell him the</p> <p>5 same way. He refused that. Aggressively told me to</p> <p>6 take the stuff, to get out.</p> <p>7 The second experience I have with him personally is</p> <p>8 the day my brother came to visit me. Then the way he</p> <p>9 searched me, I was in shock. Nobody ever -- they didn't</p> <p>10 search me like that. Then the same time I get it</p> <p>11 because I'm already hearing about him, about the first</p> <p>12 time I've been, about some friends in Brook House that</p> <p>13 says he's racist. So it was obvious, and that's my own</p> <p>14 experience, it is. For that I complained straight away.</p> <p>15 And other detainees who witnessed what happened is tell</p> <p>16 to come back to security to complain to him. They told</p> <p>17 the other detainees to mind its own business. So that's</p> <p>18 quite shock. And I said, yes, I agree that what people</p> <p>19 say is true, because, myself, I saw him with proper</p> <p>20 eyes, he done it to me.</p> <p>21 Q. But answer my question. I just want you to answer it.</p> <p>22 Of all of that, what is it about your experience with</p> <p>23 him that you say made him racist? That's what I want to</p> <p>24 understand?</p> <p>25 A. The first time he came to pick me up, the way he talked</p> <p style="text-align: center;">Page 91</p>
<p>1 You have just dealt with racism. Were you saying</p> <p>2 that Darren Tomsett was racist?</p> <p>3 A. Yes, it is.</p> <p>4 Q. We have Darren Tomsett's interview with the PSU. It was</p> <p>5 in January of 2018. I'm not going to put it up.</p> <p>6 <HOM002547>. He denies -- just so I can tell you what</p> <p>7 he said, and you may know this, he denies being</p> <p>8 a racist. He said he'd been called racist a number of</p> <p>9 times, but he was just doing his job. Do you accept</p> <p>10 that?</p> <p>11 A. No.</p> <p>12 Q. You're shaking your head?</p> <p>13 A. No, it's not true.</p> <p>14 Q. What makes you say he was racist?</p> <p>15 A. I found out myself.</p> <p>16 Q. Tell us, what experience do you have of his racism?</p> <p>17 A. The day I got my direction --</p> <p>18 Q. Your removal --</p> <p>19 A. On 28 June, come back to the Verne, and the next day</p> <p>20 I had to go to the Gatwick Airport.</p> <p>21 Q. So the day you went to Gatwick and came back?</p> <p>22 A. Yes, he came on the morning and he told me that I had to</p> <p>23 pack my staff and to get out.</p> <p>24 Q. That's right. But where was he racist?</p> <p>25 A. I'm coming. Just give me a second. It's the way he</p> <p style="text-align: center;">Page 90</p>	<p>1 to me. When I went back -- when I went down to meet the</p> <p>2 lady to take me to the Gatwick Airport, arrived on</p> <p>3 reception, he tell me to go quickly on with the lady.</p> <p>4 So I went there. So that one, they don't treat people</p> <p>5 like that. The way you treat someone, despite your --</p> <p>6 his colour of the skin, you have to give him some</p> <p>7 respect.</p> <p>8 Q. Well, everybody agrees. But tell me this, are you</p> <p>9 saying he didn't treat men who were not of colour in the</p> <p>10 same way?</p> <p>11 A. Personally, yes, because people in detention, I'm afraid</p> <p>12 to say that, in the white colour never complained about</p> <p>13 him. But it's only the black colour.</p> <p>14 Q. So that's what makes you say he was racist?</p> <p>15 A. Yes, so why he don't behave the same way with the other</p> <p>16 colour, only with the black people.</p> <p>17 Q. Let me ask you about something else. In August 2017,</p> <p>18 you lost a bail application, do you remember, and you</p> <p>19 went to your room and you didn't leave your room for</p> <p>20 a couple of days and you didn't eat. I simply want to</p> <p>21 know this: as far as you knew, did anybody know you</p> <p>22 weren't eating?</p> <p>23 A. Say again?</p> <p>24 Q. Did anybody know that you were not eating?</p> <p>25 A. I don't get it.</p> <p style="text-align: center;">Page 92</p>

1 Q. You were refusing food. You weren't eating --
 2 **A. Yes.**
 3 Q. -- in August, because you'd lost your bail application.
 4 Did anybody check to see whether you were eating?
 5 **A. No.**
 6 Q. Presumably, the only time they knew if you were eating
 7 is when they did a roll count?
 8 **A. Yes.**
 9 Q. In your first annex to your witness statement, and in
 10 your 12 October witness statement, you say a lot about
 11 spice and drugs. I'm not going to ask you any specific
 12 or general questions about it, because you deal with it
 13 at some length in the statements, but I do want to ask
 14 you about something else, a document we have not looked
 15 at yet. It is <HOM002540>, if we can put that up on
 16 screen. I'm just going to remind you what you said in
 17 your witness statement in October 2017 at paragraph 21.
 18 Do you remember saying you were invited to a meeting
 19 with a care officer on 16 September at 11.20 in the
 20 morning, and she asked you what complaints you had at
 21 Brook House:
 22 "And I filled in a form and indicated I didn't feel
 23 safe at Brook House. Since filling in this form and
 24 explaining my complaints to them, I have not heard back
 25 from Brook House management at all. Nothing has been

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1 done about the complaints I made. It makes me feel very
 2 neglected that they have not done anything about what
 3 I said. They clearly don't care about the welfare of
 4 detainees. I feel non-existent here because everything
 5 I say to staff is not really listened to."
 6 Can we just understand, the witness statement is
 7 dated 12 October. Were you still in Brook House or had
 8 you been released by then, on the 12th?
 9 **A. Released.**
 10 Q. You'd been released. You said earlier you thought
 11 4 October?
 12 **A. Yes.**
 13 Q. Let's just have a look at the document. Let's expand
 14 the top half, please. Whose handwriting is on this
 15 form, yours or someone else's?
 16 **A. Someone else's. If you go down there, "abused", that's**
 17 **my handwriting, the last word on the paper, "abused**
 18 **him", that's me. That one, "abused him".**
 19 Q. That's yours?
 20 **A. Yes, that one. The other form, it's the security guard**
 21 **who wrote down.**
 22 Q. It's what? I can't understand you, I'm sorry?
 23 **A. The others written down there, it's not from me.**
 24 Q. That's not your handwriting?
 25 **A. No.**

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1 Q. But these are your words?
 2 **A. Yes.**
 3 Q. But not your handwriting, okay. Let's look at the top
 4 of the document then. It's called a care officer
 5 monthly review. Then it gives some detail of you that
 6 perhaps we don't need to worry ourselves with, including
 7 "Has RDs been set", removal directions, "No". Then
 8 let's look further down the document, please:
 9 "Does the detainee have any problems on the
 10 wing/centre: Yes.
 11 "If yes what are they: issue with a female member of
 12 staff. Another member of staff witnessed."
 13 What was that? Who was the female member of staff?
 14 **A. It's another of the ladies, security ladies.**
 15 Q. Yes.
 16 **A. My way back to my room, to the canteen, 5 o'clock --**
 17 **before 5.00, anyway. So get into the D wing, she is**
 18 **standing there to check people to get in the D wing. If**
 19 **you are not member of the D wing, you are not allowed to**
 20 **get in.**
 21 Q. If you are not a member of D wing, you can't get in?
 22 **A. Because some people go wing to wing --**
 23 Q. You had cards?
 24 **A. Yes. So have the newspapers. I took some newspapers**
 25 **from the library. So in exchange to make sure I would**

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1 **bring back the newspapers, the officer there asked my**
 2 **card, so he keeping my card. So when I came back to the**
 3 **wing, D wing, I don't have my card on me. And this lady**
 4 **was standing with other colleagues who were D wing**
 5 **regularly security guard. So they recognise me, they**
 6 **know me. So when she asked for -- about my card, I say,**
 7 **"Ask your colleague", this is for D wing. "I took some**
 8 **newspapers so my card is with one of your colleagues in**
 9 **the library". She said, "No, if you don't get your**
 10 **card, you don't get in". So I said to them that,**
 11 **"Please ask your colleague". She said she don't want to**
 12 **listen to me. Then I was feeling very upset about --**
 13 **the next thing what she do is, she start laughing. Like**
 14 **she pick on me, making fun. So she really crossed my**
 15 **feelings and I lost my temper. I was very, very angry**
 16 **about that. One of her colleagues came to say,**
 17 **"[Redacted], calm down". This lady --**
 18 MR ALTMAN: Chair, I'm going to ask for the live stream to
 19 stop for a couple of minutes.
 20 THE CHAIR: Agreed. Thank you.
 21 MR ALTMAN: Obviously the transcript will have to be revised
 22 in due course, as with the other incident. Just
 23 a couple of minutes.
 24 It is not your fault, again. So another restriction
 25 order issue.

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24 (Pages 93 to 96)

<p>1 Without naming yourself, tell us what happened?</p> <p>2 A. So she making fun of me.</p> <p>3 Q. She made fun of you?</p> <p>4 A. Yes. Because she really crossed me and I feel upset,</p> <p>5 I lost my temper. Finally, one of the colleagues who</p> <p>6 work regularly based on D wing --</p> <p>7 Q. Sorry, pause there. Say that again. You rushed that.</p> <p>8 Say it again?</p> <p>9 A. One of --</p> <p>10 Q. The colleagues?</p> <p>11 A. One of the colleagues who knew me, working on a regular</p> <p>12 basis on the D wing, had to remind her that I'm compound</p> <p>13 D wing, he told me to walk in and then I walk in. So</p> <p>14 that second lady --</p> <p>15 Q. So somebody else allowed you to go on to D wing?</p> <p>16 A. Yes.</p> <p>17 Q. Even though your card was somewhere else?</p> <p>18 A. Yes.</p> <p>19 Q. Let's look at the other entry on this document:</p> <p>20 "Does the detainee feel safe on the wing/centre?"</p> <p>21 No.</p> <p>22 "If no why not and what has been done: people</p> <p>23 fighting and lots of spice around. Some staff no</p> <p>24 respect for detainees.</p> <p>25 "Any other issues: friend threatened in gym by other</p> <p style="text-align: center;">Page 97</p>	<p>1 [your] complaints. [You] indicated [you] didn't feel</p> <p>2 safe in Brook House ... but had received no feedback so</p> <p>3 [you] felt neglected and that G4S officers did not</p> <p>4 care."</p> <p>5 If we go to the next page at paragraph 7.8.6:</p> <p>6 "On the evidence ... I find that the allegation that</p> <p>7 ... [you] indicated [you] did not feel safe in</p> <p>8 Brook House ... but had no feedback so felt neglected</p> <p>9 and the G4S officers did not care substantiated."</p> <p>10 So that was one of the substantiated allegations as</p> <p>11 well; all right?</p> <p>12 A. Yes.</p> <p>13 Q. You deal with other matters about protests at</p> <p>14 Brook House in the annex, the first annex, to your</p> <p>15 witness statement. I'm not going to ask you about that,</p> <p>16 but then, again, it is there for anyone to read when the</p> <p>17 document is published in full.</p> <p>18 You then talk about the management of the complaints</p> <p>19 at Brook House. It is clear that you complained to the</p> <p>20 PSU?</p> <p>21 A. (Witness nods).</p> <p>22 Q. It is clear that you were interviewed at length by them</p> <p>23 on 20 December 2017 and they investigated those</p> <p>24 complaints. Just to reiterate, you made 11 allegations.</p> <p>25 Six of them were unsubstantiated, they were allegations</p> <p style="text-align: center;">Page 99</p>
<p>1 detainees and ['who', perhaps] abused him."</p> <p>2 The allegation that you made, do you see at the</p> <p>3 bottom, or these allegations, it's dated 16 October.</p> <p>4 That month appears to be wrong. It had to be September.</p> <p>5 You'd left by --</p> <p>6 A. If you look carefully, the officer will fill this form.</p> <p>7 He didn't put his name on the top of the page.</p> <p>8 Q. No.</p> <p>9 A. Secondly, when they fill that, on my knowledge, he</p> <p>10 didn't put the date, that day.</p> <p>11 Q. So --</p> <p>12 A. So it was blank.</p> <p>13 Q. Blank at the top and blank at the bottom?</p> <p>14 A. No name, no date.</p> <p>15 Q. So completed it later or was this completed in front of</p> <p>16 you?</p> <p>17 A. It was completed in front of me --</p> <p>18 Q. But the date --</p> <p>19 A. -- no date, no name.</p> <p>20 Q. -- it was dated afterwards? So --</p> <p>21 A. (Overspeaking) I can't see the date, but no name.</p> <p>22 Q. If we go back to the PSU report, <HOM002748> at page 39,</p> <p>23 do you see allegation 8 there:</p> <p>24 "That on 16 September ... [you] attended a meeting</p> <p>25 with the care officer and a form was filled in about</p> <p style="text-align: center;">Page 98</p>	<p>1 1, 3, 4, 5, 6 and 11. Four were substantiated -- 2, 7,</p> <p>2 8 and 9 -- and one was partly substantiated, and that</p> <p>3 was number 10.</p> <p>4 Let me ask you, please, to look at the letter you</p> <p>5 received -- the PSU investigation report, let me ask you</p> <p>6 this: did you just receive a letter that summarised the</p> <p>7 effect of the report?</p> <p>8 A. No.</p> <p>9 Q. Did you never receive a letter either?</p> <p>10 A. No.</p> <p>11 Q. I just want to show you something, please, <HOM002747>.</p> <p>12 Chair, it's right at the front of section B behind</p> <p>13 flag 1. Let's put that up. Do you see it's headed</p> <p>14 "Professional Standards Unit" and it is addressed to you</p> <p>15 with your cipher, D668. It says underneath:</p> <p>16 "Sent to GLD to issue."</p> <p>17 The GLD is the Government Legal Department. Can you</p> <p>18 see there is no date on it? It is dated blank. It sets</p> <p>19 out all the allegations and conclusions which are in the</p> <p>20 report which we have gone through in some detail. If</p> <p>21 you go right to the end, and I am going to ask you to</p> <p>22 look at page 17 into page 18 of this, and we will read</p> <p>23 it together, at the foot of the page on 17:</p> <p>24 "In conclusion, you raised 11 allegations ranging</p> <p>25 from inappropriate conduct by staff ... to officers</p> <p style="text-align: center;">Page 100</p>

25 (Pages 97 to 100)

1 ignoring complaints and providing insufficient feedback
 2 on any complaints you raised. You only ever raised
 3 verbal complaints and never used the Home Office
 4 complaints mechanism. You said that you had only ever
 5 submitted one complaint to the G4S complaint box in the
 6 library in August 2017. This was next to the
 7 Home Office complaints box. The form you had completed
 8 had been in the library. You received no response from
 9 G4S so did not use the formal complaints process again.
 10 You had not used the Home Office complaints process
 11 because a friend of [yours] had and was then removed."
 12 That is something you have told us about. The
 13 investigator says:
 14 "I conducted checks with Brook House ... to ensure
 15 that there was only the Home Office complaints box as
 16 there should not be and not a separate G4S complaints
 17 box. They confirmed that there was only the yellow
 18 immigration enforcement complaints box and this was on
 19 each wing. In the library there is a grey Samaritan's
 20 box and a red immigration enforcement box labelled
 21 complaints and requests. There is no box with a G4S
 22 sign on it. The Detention Centre Form ... 9 advises the
 23 detainee to place the form in the yellow box. G4S are
 24 copied in on the complaints that are sent to Detention
 25 Services. G4S provided the list from August 2017 and

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1 there were none from you.
 2 "Of the 11 allegations, I have found six
 3 unsubstantiated, four substantiated and one
 4 part-substantiated.
 5 "Turning to your policy issues on the guideline
 6 issued to G4S and Home Office staff on what to do if
 7 a detainee raises the fact that spice is being used in
 8 the centre ..."
 9 And there are four lots:
 10 "... on the rule 35 assessment and who makes the
 11 decision regarding continued detention, the
 12 accommodation ... including the toilet facilities and
 13 the time that detainees are locked up and any breaches
 14 to articles 3, 5 and 8 in respect of the conditions at
 15 Brook House ... and the lock-up ..."
 16 Then a final couple of lines:
 17 "Feedback on how the Home Office are monitoring how
 18 G4S are attempting to control how drugs come into the
 19 centre ..."
 20 The investigating officer there is Helen Wilkinson.
 21 This looks like a draft letter. It is not dated and it
 22 is not finished. Did you ever receive this letter in
 23 final form?
 24 **A. (Shakes head).**
 25 Q. Never? When did you first find out about the result of

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1 the allegations you made?
 2 **A. From my solicitor.**
 3 Q. When was that? You were interviewed in December 2017?
 4 **A. I think so, a year after that.**
 5 Q. Can I tell you before you answer, the report is dated
 6 21 February 2018. So in 2018, did you learn about the
 7 outcome of this investigation, some time
 8 after February 2018? It must be?
 9 **A. It was late after that, I think.**
 10 Q. Late?
 11 **A. Late after February.**
 12 Q. Sorry, say that again?
 13 **A. Late after February.**
 14 Q. Late February?
 15 **A. Yes.**
 16 Q. Late after February, okay. Thank you. If you didn't
 17 receive the letter, how did your solicitors find out
 18 about the outcome of the investigation? Did they ask
 19 the Professional Standards Unit for the outcome? Do you
 20 know?
 21 **A. I don't know.**
 22 Q. You don't know?
 23 **A. I don't know.**
 24 Q. By the time it was finished, you'd been released?
 25 **A. Sure, yes.**

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1 Q. In fact, by the time you were interviewed, you'd been
 2 released?
 3 **A. Yes.**
 4 Q. Because you'd been released in early October?
 5 **A. October.**
 6 MR ALTMAN: Thank you very much. Those are all the
 7 questions I am going to ask you. Chair, I don't know if
 8 you have any questions for the witness?
 9 THE CHAIR: I don't, sir. Thank you. I really appreciate
 10 you coming to give your evidence. It's been a difficult
 11 day with the IT problems. It is not an easy experience
 12 anyway, so I'm very grateful. Thank you.
 13 **A. You're welcome.**
 14 MR ALTMAN: Thank you very much for coming. Thank you.
 15 (The witness withdrew)
 16 MR ALTMAN: Chair, we have lost a lot of time today. As you
 17 know, we had programmed to hear Mr Syred this afternoon.
 18 It is not this witness's fault at all, it's the
 19 technical problems. We have lost a lot of time. I just
 20 wonder if it would be an inconvenience to anyone, not
 21 least yourself, if we were to sit a little early, at
 22 9.30 tomorrow, to try to win back some of the time we
 23 have lost today.
 24 THE CHAIR: I think that makes a lot of sense. Do we have
 25 any objections from anybody?

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26 (Pages 101 to 104)

1 MR ALTMAN: Unless anybody violently objects behind me,
2 I don't hear or see anybody doing so, shall we say 9.30?
3 We will clearly split the morning up, subject to
4 gremlins.
5 THE CHAIR: Thank you. Thank you, sir.
6 (4.13 pm)
7 (The hearing was adjourned to
8 Tuesday, 7 December 2021 at 9.30 am)

9
10 I N D E X

11
12 WITNESS D668 (sworn)1

13
14 Examination by MR ALTMAN1

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