

<p>1 Thursday, 9 December 2021</p> <p>2 (10.00 am)</p> <p>3 MS ANNA MARIE PINCUS (affirmed)</p> <p>4 Examination by MR LIVINGSTON</p> <p>5 MR LIVINGSTON: Thanks, Ms Pincus. Take a seat. You</p> <p>6 provided a large first statement to the inquiry on</p> <p>7 10 November 2021, which I think you have in front of</p> <p>8 you. For the transcript reference, that's <DPG000002>,</p> <p>9 and I ask for that to be adduced in full, please.</p> <p>10 Ms Pincus, you also provided a shorter second</p> <p>11 statement, which I think was dated 18 November 2021, and</p> <p>12 that's reference <DPG000005>, and I would ask for that</p> <p>13 to be adduced in full as well.</p> <p>14 Ms Pincus, what that means is that the whole</p> <p>15 statement will be available on the inquiry's website, so</p> <p>16 it means I don't need to ask you about every paragraph.</p> <p>17 I will just be taking you to some paragraphs and then</p> <p>18 asking you questions about them; okay?</p> <p>19 A. Thank you.</p> <p>20 Q. Firstly, looking at your role, you're currently the</p> <p>21 director of the Gatwick Detainees Welfare Group; is that</p> <p>22 right?</p> <p>23 A. That's correct, yes.</p> <p>24 Q. I'm going to shorten it to GDWG, which I understand lots</p> <p>25 of people do anyway, so I don't trip up over it too</p> <p style="text-align: center;">Page 1</p>	<p>1 consideration to things, and you can see from the range</p> <p>2 of things that, in a small NGO, everyone does a bit of</p> <p>3 everything. So although some of these things weren't</p> <p>4 central to everything that I did, it was just important</p> <p>5 to be broadening my learning.</p> <p>6 Q. On things like working with those suffering from PTSD,</p> <p>7 do you think you'd have been able to do the work that</p> <p>8 you did at GDWG without that training?</p> <p>9 A. Because, at GDWG, we aren't trained counsellors and</p> <p>10 we're not therapists, we are responding to people on</p> <p>11 a human level with our instinct, I think I could have</p> <p>12 been effective at supporting people, even manifesting</p> <p>13 those quite serious mental health problems. But where</p> <p>14 it was particularly useful for me, that particular</p> <p>15 course, was so that I could recognise if this was</p> <p>16 someone that I should be referring to an expert so that</p> <p>17 they could give more detailed support and encouragement.</p> <p>18 Q. As part of that training, were you trained -- trying to</p> <p>19 think back to 2017, can you remember, had you received</p> <p>20 training on drug awareness at that time?</p> <p>21 A. I think we did a training within our charity with the</p> <p>22 involvement of Anton Bole.</p> <p>23 Q. We are obviously focusing on 2017, and much of</p> <p>24 the questions are going to be about that, but we also</p> <p>25 want to understand a little bit about the current</p> <p style="text-align: center;">Page 3</p>
<p>1 much?</p> <p>2 A. Mmm-hmm.</p> <p>3 Q. During the relevant period, which in this inquiry</p> <p>4 is April to August 2017, you were at GDWG, but you were</p> <p>5 the senior advocacy coordinator and outreach manager; is</p> <p>6 that right?</p> <p>7 A. Yes, that's correct.</p> <p>8 Q. You initially started in 2005 as a volunteer visitor at</p> <p>9 GDWG, and then became employed a year later; is that</p> <p>10 right?</p> <p>11 A. That's right, yes.</p> <p>12 Q. In your statement, at paragraph 4, you set out some</p> <p>13 training which you received whilst you were at the GDWG,</p> <p>14 including on things like developing supportive</p> <p>15 relationships, understanding suicidal language, working</p> <p>16 with those suffering PTSD. When you were being trained</p> <p>17 on that, was that with other NGOs, was that with anyone</p> <p>18 else working at Brook House?</p> <p>19 A. Those were external training sessions that I attended</p> <p>20 individually.</p> <p>21 Q. Okay.</p> <p>22 A. Yes, I was requested to by my organisation.</p> <p>23 Q. Did you find that type of training helpful?</p> <p>24 A. Incredibly helpful, yes. It was helpful just to take</p> <p>25 time away from the workplace, to give extra</p> <p style="text-align: center;">Page 2</p>	<p>1 situation and current practice.</p> <p>2 A. Yes.</p> <p>3 Q. Have you received any more sort of significant training</p> <p>4 since that 2017?</p> <p>5 A. I have been on a safeguarding training. We do</p> <p>6 safeguarding training annually, and I've recently been</p> <p>7 on an equalities for recruitment training. As I say,</p> <p>8 because we are a small charity and we are doing a little</p> <p>9 of everything, it's quite important to keep updated in</p> <p>10 lots of different areas.</p> <p>11 Q. I'm going to move on to ask you a bit about GDWG and the</p> <p>12 role that the organisation played in 2017. You've set</p> <p>13 that out in some detail in your witness statement, so</p> <p>14 instead of getting you to repeat it all, I'm going to</p> <p>15 summarise it and you can tell me if you think that is</p> <p>16 about right.</p> <p>17 You set out, at paragraphs 7 to 13 of your</p> <p>18 statement, a summary of what GDWG does, saying it</p> <p>19 provides a wide range of emotional and practical support</p> <p>20 to detained people held at Gatwick IRCs and that this</p> <p>21 includes offering friendship and support, advocating for</p> <p>22 fair treatment and calling for positive change and</p> <p>23 a future without detention.</p> <p>24 You also say you try to use your own insight as an</p> <p>25 organisation to try to improve conditions for people</p> <p style="text-align: center;">Page 4</p>

<p>1 held in detention, inform policy and challenge negative 2 images of people affected by immigration. 3 Is that solely looking at Brook House and 4 Tinsley House, or is that more widely?</p> <p>5 A. The knowledge that we have is from our work in the 6 centre over 25 years, so we are in a privileged position 7 of having kind of unique access to all those stories, 8 all those data. We have to honour it and use it in the 9 best possible way that we can to effect change.</p> <p>10 So, yes, it's largely a focus on the information 11 that we get from there, but people who are detained at 12 Brook House and Tinsley House get moved around the 13 detention estate and, after detention, they also suffer 14 the effects of detention.</p> <p>15 So we reflect on how detention impacts their lives 16 after detention and upon, really, their entire journey 17 around the detention estate.</p> <p>18 Q. Have you ever found in your work for GDWG that the aims 19 of improving conditions, so within detention centres, 20 and offering support for people within detention centres 21 and your aim of calling for a future without detention, 22 have you ever found that those conflict or collide, or 23 do you find that you're able to pursue them all?</p> <p>24 A. They're all so closely related, so our work as visitors, 25 as a visitors group and a welfare group, the heart of</p> <p style="text-align: center;">Page 5</p>	<p>1 volunteer visitors. I'm not going to ask you much about 2 that, because we heard from Mr MacPherson yesterday, who 3 is a volunteer visitor. You also refer to a small team 4 of advocacy coordinators, staff who co-ordinate the work 5 of volunteers and provide support and advocacy 6 themselves. This is the team that you led during the 7 relevant period; yes?</p> <p>8 A. Yes.</p> <p>9 Q. You set out in your statement at paragraphs 10 to 11 10 what the team does and did?</p> <p>11 A. Yes.</p> <p>12 Q. Including matching volunteers with detained people, 13 referring detained people to external agencies and 14 helping detained people navigate the detention system, 15 and also providing sort of material support, whether 16 that's clothing or phone cards, and things like that?</p> <p>17 A. Yes.</p> <p>18 Q. Is that a fair summary of what your team did?</p> <p>19 A. Yes, it is, thank you.</p> <p>20 Q. One of the things you mention in your statement at 21 paragraph 11 is that part of the role was to raise 22 concerns with Brook House management where there were 23 concerns about a detained person. Is that something 24 that all advocacy coordinators were told was part of 25 their role?</p> <p style="text-align: center;">Page 7</p>
<p>1 that is conversations in the visits room. We have been 2 having those conversations for 25 years. There comes 3 a point where you have to recognise the harm that you 4 see being done to people and to express that and to work 5 for positive change.</p> <p>6 So, you know, people ask us if we're a campaigning 7 group. You know, if you think of the word "campaign" as 8 a signifier for marching or petitions, we aren't doing 9 those things, but we are using the stories of people who 10 have been detained. In our project called 11 Refugee Tales, we share those stories and then we use 12 the stories written down to have conversations with 13 people of influence, but those aren't kind of binary, 14 shouting Twitter arguments, it's very much trying to 15 connect people with the visceral power of story to make 16 them realise how a general policy impacts at human 17 level.</p> <p>18 So I think we're best placed to explain how policy 19 impacts individuals, and that has to be an important 20 theme.</p> <p>21 Q. So it's connecting the systemic issues with the 22 individual people who experience those issues?</p> <p>23 A. Yes.</p> <p>24 Q. You refer -- just looking at sort of how GDWG is 25 structured, you obviously talk about your network of</p> <p style="text-align: center;">Page 6</p>	<p>1 A. It was part of their role, yes.</p> <p>2 Q. You also mention about helping detained people to use 3 complaints processes that exist?</p> <p>4 A. Mmm-hmm.</p> <p>5 Q. Including contacting other organisations, such as the 6 IMB. I'm keen to get a sense of whether this was 7 proactive or reactive. So what I mean is, would you be 8 telling them that, you know, "If you ever need to make 9 a complaint, this is how you do it", or would it be that 10 if someone told you something or had a complaint, that 11 you would then say, "Well, this might be how you want to 12 do it"?</p> <p>13 A. So it would be reactive. If someone told us that there 14 was something that they were very upset about, something 15 that had happened recently, we would explain to them the 16 ways that they could make a complaint.</p> <p>17 Q. Okay.</p> <p>18 A. Sometimes they would ask for our help, and sometimes 19 they would just need us to talk through to give them the 20 confidence to do it for themselves. I'd have to say 21 that most people that we met did not feel safe enough to 22 make a complaint.</p> <p>23 Q. We will come on to the sort of issues about that a bit 24 in due course.</p> <p>25 In your statement, you talk at paragraph 23 about</p> <p style="text-align: center;">Page 8</p>

1 how detained people come to you as an organisation --
 2 when I say "you", I don't always just mean you
 3 personally -- and you describe a mixture of
 4 self-referrals from posters and leaflets, some word of
 5 mouth between detained people, some referrals from the
 6 welfare office, some from chaplaincy and some from
 7 elsewhere.

8 **A. Yes, Samaritans.**

9 Q. Were you aware of whether detained people were told
 10 about your organisation upon induction into Brook House?

11 **A. That's a really interesting question, because that was
 12 something we really wished for. We wished that we could
 13 have our flyer -- we have got a flyer that says, "Would
 14 you like a visitor?", and we really hoped that would be
 15 in the induction pack. At that time, I think, we
 16 weren't able to achieve it.**

17 Q. Do you know whether people were told about it without
 18 getting a flyer or do you not know?

19 **A. Although we weren't given permission to have the flyers
 20 in the induction pack, we understood that flyers were in
 21 the centre -- at least we used to take them in. We
 22 could never, of course, check for ourselves whether they
 23 were displayed, but we used to take them in to be in the
 24 library for people to hopefully see and pick up.**

25 Q. Were you ever told by a detained person or by someone

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1 else about whether detained people were encouraged or
 2 discouraged, or neither, by Brook House staff to contact
 3 you?

4 **A. I think we were certain that the welfare staff were
 5 encouraging people to contact us, because they would
 6 actually telephone us from welfare and say, "I've got
 7 a man here. He needs phone credit" or, "He's about to
 8 be removed. Can you give him removal money?", and hand
 9 the phone to the person to speak to us.**

10 Q. Was that Mr Syred from the welfare office?

11 **A. It may have been. I can't remember who it was at that
 12 time.**

13 Q. At paragraphs 26 and 27 of your statement, you talk
 14 about the sort of process once somebody came into
 15 contact with you as an organisation, and you say there
 16 would be an initial phone call with the detained person
 17 to take preliminary information --

18 **A. Yes.**

19 Q. -- and then make a connection, hopefully, over the
 20 phone, and then there would be a visit by a member of
 21 staff?

22 **A. Mmm-hmm.**

23 Q. Just on that phone call, would that be done using the
 24 phone that the detained people were given when they were
 25 admitted? Do you know?

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1 **A. Yes, I think it would.**

2 Q. In terms of that visit by the staff member, would there
 3 always be a member of staff who would see the detained
 4 person in person first, before a visitor saw them?

5 **A. That was our intention. There were very rare occasions
 6 when, for some reason, we were short staffed, when we'd
 7 have to just allocate someone a visitor on the back of
 8 a phone call. But, in general, we felt it was best to
 9 see somebody before we allocated a visitor.**

10 Q. We have heard evidence that obviously detention in
 11 Brook House was indefinite, in the sense that there
 12 wasn't a time limit on it.

13 **A. Yes.**

14 Q. But would you know, when you first came into contact
 15 with a detained person, how long they were likely to be
 16 in there? Would you know if you only had 48 hours to
 17 see them or if you had a week to see them or a month?

18 **A. Detained people had no idea how long they'd be detained.
 19 Detained people had no idea why they were detained.
 20 People would come and see us and say, "I don't know why
 21 I'm here. Please find out. Please explain to me what's
 22 going on". They had no clue what was happening to them,
 23 for many people.**

24 Q. That first in-person meeting that you say you tried to
 25 have, how long would that last, typically, or is there

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1 no typical time?

2 **A. So those first meetings were timetabled for half an hour
 3 so that we could see four people in the course of
 4 the two-hour period that we had the room for.**

5 Q. I think I'm right -- and we are going to come on to talk
 6 about this -- that these were called drop-in sessions,
 7 even though I think you say in your statement that they
 8 weren't technically drop-in sessions because somebody
 9 couldn't actually just drop in, they already needed to
 10 have an appointment. Is that right?

11 **A. Yes, exactly.**

12 Q. We will refer to them as drop-ins, because that seems to
 13 be the language that was used --

14 **A. Yes.**

15 Q. -- but it is noted that they weren't actually drop-ins.
 16 You have said that those usually took place in private
 17 rooms which were the same as those used for legal
 18 visits. Was that always the case, that they would take
 19 place in private rooms?

20 **A. Yes, they were always in private rooms. Sometimes if
 21 all the legal visit rooms were full, we'd use the rooms
 22 that were used for the videolink bail hearings. But
 23 always private rooms.**

24 Q. You never had to do those first meetings in the visits
 25 hall?

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3 (Pages 9 to 12)

<p>1 A. No. Only at the period in years before that when, once, 2 G4S suspended our drop-ins. 3 Q. When was that, roughly? 4 A. I think it was roughly 2013. 5 Q. That's obviously a few years before the relevant period, 6 so we won't go into that. 7 You have said it was far preferable to see 8 a detained person in a private room rather than the 9 visits hall? 10 A. Yes. 11 Q. It may seem obvious to you, but can you explain why that 12 was far preferable? 13 A. People were much more likely to be open about how upset 14 they were feeling. When our visitors see people in the 15 visits room, there are lots of other detained people 16 with their families, and sometimes there's a bit of kind 17 of macho bravado. They don't want to appear vulnerable 18 in front of other detained persons. So people would 19 definitely put on a bit of a front in the visits hall 20 that would not be evident in the room when we met them 21 one on one. 22 Q. You say in your statement at paragraph 30 that, in order 23 to get to these initial visits in legal rooms, detained 24 people had to go through a security search and then be 25 given access through barred gates and then often wait</p> <p style="text-align: center;">Page 13</p>	<p>1 need a phone card to be able to tell their family where 2 they are. Someone might be in the centre, not have 3 a pair of shoes, being sent back to a country and only 4 have the flip-flops they're walking in. They might only 5 contact us once. 6 Somebody might take a while to warm up with us, to 7 feel that they trusted us, and then it might be 8 irregular contact at first and then more frequent 9 contact. So these were not linear relationships. 10 People might contact us irregularly and then get bad 11 news from the Home Office or have a problem at home or 12 just start to feel escalating feelings of despair and 13 need more support. 14 Q. We will come on to talk a little bit more about how 15 there were restrictions on the number of times that you 16 could see -- as staff, the number of times you could see 17 someone for a drop-in? 18 A. Yes. 19 Q. Am I right in thinking that there was no restriction on 20 the number of times you could speak to them on the 21 phone? 22 A. There was no restriction, other than the difficulties of 23 reaching people on the phone because of poor 24 connectivity. 25 Q. I wanted to ask you about that. It is obviously quite</p> <p style="text-align: center;">Page 15</p>
<p>1 for a period of time. Would you, as an organisation, 2 have preferred to see people within the main communal 3 areas of the IRC so that they didn't have to go through 4 that? 5 A. Yes, it would be absolutely -- it would be so different 6 if the drop-in was a real drop-in, in the sense that 7 passing people could see us seated at a desk and just 8 sit down and talk, because the current structure of 9 drop-ins and the structure then and the need for people 10 to self-refer meant that people who didn't speak 11 English, who were illiterate and, you know, people who 12 lacked confidence, people who were unable to communicate 13 because of issues of capacity, all those people we 14 weren't able to reach and we would be much more likely 15 to reach them if we could just see them walking past, 16 you know, make eye contact, be welcoming and encourage 17 them to sit down and talk to us. 18 Q. You say in your statement that, after that initial 19 visit, staff would maintain contact and would often 20 speak regularly on the phone with the detained person. 21 Can you give any sort of estimate about how often staff 22 would speak on the phone with someone, or is it just 23 totally varied? 24 A. It's totally varied. So someone might see us, it might 25 be quite a transactional relationship, they might just</p> <p style="text-align: center;">Page 14</p>	<p>1 a practical question. 2 A. Yes. 3 Q. I mean, did you find that, generally, you were able to 4 get through to people if you wanted to speak to them or 5 they wanted to speak to you, or were there just sort of 6 areas where there was no signal? 7 A. Quite often, there was no signal. It was immensely 8 frustrating, and not just for us. For people's families 9 and their legal representatives, it was just another 10 thing that they had to battle with. 11 Q. What about text messages? Were you able to text with 12 people? 13 A. So that would be quite an informal level of 14 communication that, as a charity, we wouldn't really 15 use. We only ever use text to send somebody the numbers 16 for a phone card, to be sure that they were getting the 17 number for the phone card securely. 18 Q. So you wouldn't be chatting -- 19 A. We wouldn't be chatting or messaging, no. 20 Q. Coming on to the numbers of people that you saw, you set 21 this out at paragraph 32, which is on page 13 of your 22 statement. You have given some numbers for the numbers 23 of detained people you assisted across Brook House and 24 Tinsley, so the combined numbers. They are, you say, 25 1,376 people in 2016; 1,071 people in 2017; and then</p> <p style="text-align: center;">Page 16</p>

<p>1 almost double that in each of the next three years.</p> <p>2 What that suggests is that there was quite</p> <p>3 a significant -- there was quite significantly fewer</p> <p>4 people that you were able to assist in 2017 than in</p> <p>5 other years.</p> <p>6 I think you say, trying to look at Brook House</p> <p>7 individually and the relevant period individually, that</p> <p>8 you assisted in some way a total of about 380 people, so</p> <p>9 that, according to my maths, anyway, is about 76 people</p> <p>10 a month.</p> <p>11 Based on the figures that you have given overall and</p> <p>12 that figure of 76 a month, do you think that that -- was</p> <p>13 that quite low, that 76 a month, during the relevant</p> <p>14 period?</p> <p>15 A. It was a very interesting exercise, writing this</p> <p>16 statement and seeing those figures. Because, at the</p> <p>17 time, I had no sense that they were lower. We certainly</p> <p>18 weren't less busy. I've reflected on it since I --</p> <p>19 because I was asked by the inquiry for the reasons why,</p> <p>20 and I tried to work those out, but since then I've</p> <p>21 wondered whether it might also have been the severity of</p> <p>22 the situation -- of the level of desperation at that</p> <p>23 time that we were actually having to put a lot of time</p> <p>24 in to certain individuals, maybe why it wasn't</p> <p>25 experienced as a lower -- we weren't less busy, we</p> <p style="text-align: center;">Page 17</p>	<p>1 as well. Then, also, you say that you were told</p> <p>2 in February 2017 by Anton Bole of the Forward Trust that</p> <p>3 he hadn't seen your posters or leaflets in Brook House</p> <p>4 other than some French and Spanish --</p> <p>5 A. Mmm-hmm.</p> <p>6 Q. -- which you say may mean that detained people didn't</p> <p>7 know about GDWG?</p> <p>8 A. Mmm-hmm.</p> <p>9 Q. Trying to think back to 2017, did you think at the time</p> <p>10 that there was any sort of deliberate attempt to sort of</p> <p>11 suppress people's knowledge of GDWG, or do you think it</p> <p>12 was just that leaflets were not getting passed out</p> <p>13 properly?</p> <p>14 A. I'd have to be honest and say it could be that somebody</p> <p>15 tore down the leaflets or that other leaflets got put up</p> <p>16 over our leaflets. I couldn't be certain about the</p> <p>17 intention.</p> <p>18 Q. I want to come on to the issue about restrictions on</p> <p>19 repeat visits and your relationship with G4S and the</p> <p>20 Home Office.</p> <p>21 A. Yes.</p> <p>22 Q. We will also be talking tomorrow about this with</p> <p>23 James Wilson, who was the director of GDWG at the time.</p> <p>24 But a quick background for the chair and the public is</p> <p>25 that I think I'm right in saying that, in 2016 and 2017,</p> <p style="text-align: center;">Page 19</p>
<p>1 weren't twiddling our thumbs.</p> <p>2 Q. Just to get an idea of how we get to those numbers,</p> <p>3 because, obviously, you have just said that you weren't</p> <p>4 less busy. Is it possible, even if you can't remember</p> <p>5 exactly, that there would have been other detained</p> <p>6 people who had sought assistance from GDWG that you</p> <p>7 weren't able to assist because of capacity issues, or</p> <p>8 would that be everyone who came to you whom you were</p> <p>9 able to help in some way?</p> <p>10 A. That would have been everyone who came to us.</p> <p>11 Q. You have given in your statement some of the possible</p> <p>12 reasons -- you've just obviously given another one</p> <p>13 there -- for the lower numbers in 2017. One of</p> <p>14 the reasons that you have given was that Brook House</p> <p>15 were restricting the number of times that you could see</p> <p>16 detained people. Now, we are going to come on to that</p> <p>17 in more detail later, but presumably that wouldn't</p> <p>18 affect the number of people you could help as a whole;</p> <p>19 that just affects the number of times you could see</p> <p>20 them?</p> <p>21 A. Yes.</p> <p>22 Q. You also say that you had increased capacity from 2018;</p> <p>23 that a member of the chaplaincy team who had been</p> <p>24 referring people back in 2016 had left by 2017; also,</p> <p>25 from 2018, you started to hold drop-ins at Tinsley House</p> <p style="text-align: center;">Page 18</p>	<p>1 Brook House management generally restricted the number</p> <p>2 of drop-in sessions to one per detained person unless</p> <p>3 there were exceptional circumstances; is that right?</p> <p>4 A. That's correct.</p> <p>5 Q. So where you or one of your staff met a detained person</p> <p>6 in the legal visits room, as we have already discussed,</p> <p>7 unless there was an exceptional reason, you weren't</p> <p>8 generally allowed to then have a second visit with that</p> <p>9 same person?</p> <p>10 A. That's correct.</p> <p>11 Q. You say in your statement, at paragraph 37, that you</p> <p>12 understood that the reason given by Brook House</p> <p>13 management for seeking to limit those drop-in sessions</p> <p>14 to one per person was that they thought the role of GDWG</p> <p>15 was, or should be, limited to a befriender service only.</p> <p>16 I'm asked on behalf of G4S to ask you on what basis you</p> <p>17 understood that, that they thought you should be</p> <p>18 a befriender service only?</p> <p>19 A. Because members of G4S stated that to James in meetings.</p> <p>20 Q. Okay.</p> <p>21 A. And James will be able to give you the exact details of</p> <p>22 those meetings and exactly what was said.</p> <p>23 Q. Do you remember whether you were ever told that, or were</p> <p>24 you hearing from James the position, James Wilson?</p> <p>25 A. When James was told that -- actually, it was before</p> <p style="text-align: center;">Page 20</p>

<p>1 James. When the previous director was told that, he 2 wouldn't sign a memorandum of understanding on that 3 basis. 4 Q. Okay. 5 A. That continued into the time of James. James informed 6 me that we couldn't do a second drop-in. 7 Q. Unless there were exceptional circumstances? 8 A. Unless there were exceptional circumstances and we had 9 permission from management. I think I've said in my 10 statement, once, I was in a meeting and a DCO 11 interrupted my meeting and told me that this was the 12 second time I'd seen the person I was seeing. It was 13 not. I would not have seen someone a second time, as 14 I wasn't permitted to. 15 Q. You do refer to that, and that's at paragraph 42 of your 16 statement. You say it was DCO Gayatri Mehraa who burst 17 into the room saying this was a second visit and must 18 end now, even though, in fact, it was a first visit? 19 A. Yes. 20 Q. Do you remember, did that occur during the relevant 21 period, from April to August 2017? 22 A. It did, yes. 23 Q. Do you have any insight as to why she had that attitude 24 towards you as an organisation? 25 A. I have no idea why she was feeling it was necessary to</p> <p style="text-align: center;">Page 21</p>	<p>1 capacity. That's where the casework was coming into it, 2 and I think they [GDWG] were starting to interfere with 3 the Home Office in terms of the Home Office's objective 4 of removing people from the UK. Gatwick Welfare Group 5 were then starting, I think, to cause issues in that." 6 Do you accept that you were interfering with the 7 Home Office in terms of their objective of removing 8 people from the UK? 9 A. No, we were not. 10 Q. In terms of Mr Haughton, Dan Haughton, was he a sort of 11 liaison between you and G4S, or did it just so happen 12 that there was correspondence between you and him? Do 13 you remember? 14 A. So I had no contact with management at that time, I'm 15 afraid. That would be a question for James. 16 Q. What do you say about him commenting on his perception 17 that you were interfering with the Home Office's 18 objectives? Do you have any views on that? 19 A. I just find it unfathomable because we're a welfare 20 group. The reason we needed to see people more than 21 once was, as I've said, because relationships with 22 people aren't linear. If we needed to see someone three 23 times, it was because that person needed more support. 24 Very often, we were assisting Brook House by 25 explaining to people why they were being held, by</p> <p style="text-align: center;">Page 23</p>
<p>1 kind of police that rule. She must have been informed 2 by management that that was the rule, because she 3 wasn't, herself, a manager, I don't believe. 4 Q. We will go into, as I said, tomorrow, with James Wilson 5 how this restriction on drop-ins evolved, but you say at 6 paragraph 39 of your statement that your sense was that 7 the restriction in drop-in sessions to one per person 8 was done to try and limit GDWG's work for detained 9 people, to reduce, not encourage, safeguarding concerns 10 from being raised, and that this was because they 11 considered that your work interfered with the 12 Home Office's purpose of removing people. 13 You also refer, Ms Pincus, to a quote from 14 Dan Haughton, who I believe was a manager at G4S, at 15 Brook House, during the relevant period. For the 16 record, chair, that's <VER000290> but we don't need to 17 bring it up because it is within Ms Pincus's statement. 18 You extract that quote in which he says: 19 "They started seeing ..." 20 "They" is GDWG: 21 "... seeing the same detainee several times in a 22 month, they'd see the same person three time, and you 23 think, hold on, surely you've seen that person once, 24 you've said, you're the perfect person for this 25 volunteer, we'll get you to see them in a social</p> <p style="text-align: center;">Page 22</p>	<p>1 helping them to understand whether they had a legal 2 representative when they'd been to a legal advice 3 surgery and come away with no piece of paper saying who 4 they'd seen, whether they were represented. They just 5 had no clue about what was going on. 6 Q. Do you think that this is sort of the thrust of it, 7 which you just said there, which is, you felt that you 8 were helping them to be able to run Brook House, and did 9 you see that as a sort of opposing viewpoint, that you 10 saw yourselves as helping them, because you were helping 11 detained people understand things, whereas they saw you 12 as, perhaps, an impediment? 13 A. I can't say what their perception was, but we were not 14 an impediment. And very often our visitors defused 15 different situations that could have escalated and 16 caused problems for Brook House, just by calming people 17 down, making them feel heard, making kind of human 18 interventions that meant that moments of crisis didn't 19 occur. 20 Q. You say at the end of paragraph 39 that "G4S saw us 21 doing too much and they wanted to restrict what we were 22 doing for detained people". Do you maintain that 23 position? 24 A. Yes. 25 Q. I know I'm asking you often to comment on their reasons</p> <p style="text-align: center;">Page 24</p>

<p>1 for things, so I know you can only say what your</p> <p>2 perception is, but do you have any insight as to why</p> <p>3 they wanted to restrict you, what you were doing for</p> <p>4 detained people?</p> <p>5 A. It's just -- it's unfathomable. I don't know why they</p> <p>6 wanted to restrict what we were doing for detained</p> <p>7 people.</p> <p>8 Q. You also come on in your statement at paragraphs 40 to</p> <p>9 41 to discuss an occasion when a staff member at GDWG</p> <p>10 asked Dan Haughton to see a vulnerable detained person</p> <p>11 for the second time, so for a repeat visit, and you set</p> <p>12 out in your statement that this was refused by</p> <p>13 Mr Haughton on the basis that your drop-ins had</p> <p>14 "developed into a welfare surgery". Do you accept that</p> <p>15 your drop-ins had developed into a welfare surgery?</p> <p>16 A. Well, "welfare" is a word that means looking after the</p> <p>17 well-being of a person, and the well-being of a person</p> <p>18 depends upon them having information and understanding</p> <p>19 what's happening to them.</p> <p>20 Q. So I suppose is the answer, yes, you do accept that, but</p> <p>21 you don't see a problem with that, that you were</p> <p>22 providing welfare support?</p> <p>23 A. We were providing welfare support, yes.</p> <p>24 Q. You say in your statement, and this is at paragraph 41,</p> <p>25 that the consequences of Mr Haughton refusing that</p> <p style="text-align: center;">Page 25</p>	<p>1 intended purpose. From the Home Office's point of view,</p> <p>2 this [is] not the purpose of your drop-in. The detainee</p> <p>3 has been integrated into the general population and is</p> <p>4 doing well. We have built the support plan with him and</p> <p>5 he likes it."</p> <p>6 Just looking at those last two sentences, the</p> <p>7 suggestion that the detainee had been integrated, doing</p> <p>8 well and he likes his support plan, what did you take</p> <p>9 that to mean and what do you take that to mean?</p> <p>10 A. I think it was dismissive because it denied the detained</p> <p>11 person the choice to identify somebody in the centre</p> <p>12 that they felt comfortable talking to to make</p> <p>13 a potential disclosure. So a detained person might not</p> <p>14 go to officers in the centre as a first port of call to</p> <p>15 talk about something delicate, or even possibly about</p> <p>16 the way they were being treated in the centre. I think</p> <p>17 that person should have had the opportunity to share</p> <p>18 with us. All it was, was a second drop-in.</p> <p>19 Q. Again, trying to look at it now, do you have any view on</p> <p>20 the reason why G4S refused that request?</p> <p>21 A. I think the tone of the email -- I know it's hard to</p> <p>22 gauge the tone of an email, but it felt dismissive, it</p> <p>23 felt as if we were being kept at arm's length or</p> <p>24 excluded from developing supportive relationships with</p> <p>25 people in detention.</p> <p style="text-align: center;">Page 27</p>
<p>1 second drop-in were potentially very serious. Why do</p> <p>2 you say that? Do you remember? Why do you say the</p> <p>3 consequences were potentially very serious?</p> <p>4 A. Because a person who was possibly under 18, who was</p> <p>5 allegedly under 18, was asking to see us because they</p> <p>6 had something to tell us. We hadn't -- they did not</p> <p>7 want to tell us on the phone. It could have been, you</p> <p>8 know -- it could have been any manner of things, but it</p> <p>9 could have been a safeguarding issue.</p> <p>10 We thought -- we tried not to ask Brook House for</p> <p>11 second appointments unless it was really necessary,</p> <p>12 because our relationship with them was rocky. We</p> <p>13 thought that was a definite example when they would have</p> <p>14 to say yes, because it was someone who was potentially</p> <p>15 under age, and it was a potential safeguarding</p> <p>16 disclosure, and they said no.</p> <p>17 Q. In Mr Haughton's response, which is set out in your</p> <p>18 statement at paragraph 40, but is also, for the record,</p> <p>19 at <GDW000003>, page 27, Mr Haughton says, as</p> <p>20 explanation:</p> <p>21 "The detainee ..."</p> <p>22 I'll read it out:</p> <p>23 "To put it bluntly: no, there has been scrutiny from</p> <p>24 outside and concerns raised about your drop-ins. It has</p> <p>25 developed into a welfare surgery. This is not its</p> <p style="text-align: center;">Page 26</p>	<p>1 Q. You refer, when talking about repeat visits in general,</p> <p>2 at paragraph 43 of your statement, you suggest that</p> <p>3 detained people, in your experience, need time to build</p> <p>4 up trust and rapport and tend to convey information in</p> <p>5 stages. In your experience, both personally and sort of</p> <p>6 organisationally, what impact would repeat visits make</p> <p>7 on a detained person's ability to disclose things?</p> <p>8 A. I think they're crucial. I think they're crucial. You</p> <p>9 have to remember that we were in the -- we were in the</p> <p>10 drop-in corridor. It's the same corridor where</p> <p>11 embassies come and do interviews, where Home Office</p> <p>12 interviews sometimes take place, where legal visits take</p> <p>13 place. So it would be easy, in that context, for people</p> <p>14 not to understand, the first time they come and see us,</p> <p>15 that we're an independent charity.</p> <p>16 The room itself kind of belied the nature of our</p> <p>17 interaction. I think I say in my statement, on one side</p> <p>18 of the table there's a chair with a padded seat that</p> <p>19 I sit in, and on the other side there's a chair with</p> <p>20 a plastic seat that the detained person sits in.</p> <p>21 There's a power imbalance.</p> <p>22 So to make a connection in spite of that</p> <p>23 environment, in spite of the architecture, took some</p> <p>24 doing, and people would often come into the first</p> <p>25 meeting, you know, almost challenging you not to</p> <p style="text-align: center;">Page 28</p>

<p>1 connect, you know, not making eye contact, being</p> <p>2 brusque, and you'd have to work really hard to develop</p> <p>3 trust. It's not always easy to do that in half an hour,</p> <p>4 especially with a language barrier.</p> <p>5 Q. Were you ever told directly from a detained person, who</p> <p>6 you perhaps either spoke to on the phone again or had</p> <p>7 another visit with, that that first visit, they'd not</p> <p>8 felt comfortable or not felt able to disclose, or</p> <p>9 anything like that?</p> <p>10 A. Many times, yes. People would say -- people would</p> <p>11 reflect back, "I didn't trust you the first time I met</p> <p>12 you". You know, they'd sort of say, "Look how far we</p> <p>13 have come in our understanding of each other".</p> <p>14 Q. In your ideal world in which you're visiting people as</p> <p>15 an organisation, obviously you assign people volunteer</p> <p>16 visitors, if that's what they want. If you could have</p> <p>17 it, I suppose, as you wished, would you just wish there</p> <p>18 to be no restriction on the amount of times that you</p> <p>19 could see people if they requested it? Is that what you</p> <p>20 would like?</p> <p>21 A. I would, yes.</p> <p>22 Q. I suppose -- what did you see as the difference between</p> <p>23 someone's ability to disclose something to you, or</p> <p>24 another member of staff at GDWG, and their ability to</p> <p>25 disclose something to a volunteer visitor? Because,</p> <p style="text-align: center;">Page 29</p>	<p>1 where those requests were turned down, but presumably</p> <p>2 there were occasions where they were accepted as well?</p> <p>3 A. There were, yes. I can't say how many, but I know we</p> <p>4 weren't making many requests because -- I'm sure you'll</p> <p>5 come to this tomorrow, but James was threatened by</p> <p>6 management to cease our drop-ins if we overstepped</p> <p>7 certain boundaries, and that was something we were</p> <p>8 terrified of happening.</p> <p>9 Q. I know that it's difficult to give a number, but are we</p> <p>10 talking sort of that you would request a repeat drop-in</p> <p>11 once a month, once a week, or do you have any insight --</p> <p>12 you know, which one of those?</p> <p>13 A. To the best of my memory, it would have been twice</p> <p>14 a month.</p> <p>15 Q. That's helpful. You've already said that you felt -- or</p> <p>16 to your understanding, James was threatened with</p> <p>17 stopping the drop-ins, and I'll obviously speak with</p> <p>18 James about that tomorrow. You personally, and you as</p> <p>19 an organisation, did you feel deterred from making</p> <p>20 requests for drop-ins, for second drop-ins, during the</p> <p>21 relevant period?</p> <p>22 A. Yes, we did.</p> <p>23 Q. You've said, obviously, that your requests were often</p> <p>24 queried or denied or granted or made on exceptional</p> <p>25 basis. You have spoken about a draft memorandum of</p> <p style="text-align: center;">Page 31</p>
<p>1 obviously, visitors are allowed to see people as many</p> <p>2 times as they want, I believe. So why couldn't anything</p> <p>3 that they needed to disclose just be disclosed to</p> <p>4 a visitor?</p> <p>5 A. Some people would make disclosures to visitors, but very</p> <p>6 often -- not very often. Sometimes most vulnerable</p> <p>7 people actually didn't have a visitor, they didn't feel</p> <p>8 confident enough, they weren't well enough. It takes</p> <p>9 quite a lot of confidence to build a relationship with</p> <p>10 a stranger in a visits hall. For people who were that</p> <p>11 unwell, staff in the office would maintain</p> <p>12 communication. And there were certain people who were</p> <p>13 so unwell that we would telephone them every day just to</p> <p>14 check in and make sure they were safe, see how they were</p> <p>15 doing.</p> <p>16 Q. You say in your statement that where you had an</p> <p>17 exceptional need for it during the relevant period, you</p> <p>18 would ask G4S for a repeat visit?</p> <p>19 A. Yes.</p> <p>20 Q. But you tried not to do it unless it was really</p> <p>21 exceptional.</p> <p>22 A. Yes.</p> <p>23 Q. Do you have any sense of what sort of proportion of</p> <p>24 requests that you were making were being granted during</p> <p>25 that time? Because, obviously, we have got examples of</p> <p style="text-align: center;">Page 30</p>	<p>1 understanding. If we can bring that up on screen,</p> <p>2 please, at <GDW000003> at page 1, please. If we can</p> <p>3 zoom in on the first few bullet points, please.</p> <p>4 Ms Pincus, you have seen this document before, I guess?</p> <p>5 A. Yes.</p> <p>6 Q. So this is a draft memorandum of understanding between</p> <p>7 G4S and GDWG, dated February 2016. You referred to it</p> <p>8 as an unsigned memorandum of understanding. We can see</p> <p>9 that it's not signed. Was it your understanding that,</p> <p>10 during the relevant period, this wasn't agreed and so</p> <p>11 this was just a sort of working document, or did you</p> <p>12 understand this to set out the agreed position?</p> <p>13 A. It was my understanding that it was unsigned.</p> <p>14 Q. You will see, obviously, at bullet points 2 and 3 that</p> <p>15 it talks about "surgery sessions", which I think is</p> <p>16 another word for visits or drop-ins; yes?</p> <p>17 A. Yes.</p> <p>18 Q. And then the second bullet point says:</p> <p>19 "The purpose of the meetings is to allow for GDWG</p> <p>20 staff to conduct an initial interview with detainees in</p> <p>21 order to assess the individual needs of detainees and</p> <p>22 identify an appropriate GDWG visitor to attend for</p> <p>23 ongoing ... visits."</p> <p>24 Do you accept that that does describe the purpose of</p> <p>25 the meetings?</p> <p style="text-align: center;">Page 32</p>

<p>1 A. I do, but I think it also doesn't recognise the dynamic 2 nature of assessment. You don't see somebody once and 3 assess them and then they maintain the same level of 4 vulnerability for their entire time in a detention 5 centre. 6 Q. The third bullet point says: 7 "On occasion it may be in the interest of a detainee 8 to have a further follow-up meeting in private with GDWG 9 staff. These will be exceptional circumstances 10 requiring prior agreement with G4S and Home Office 11 management." 12 Did you understand that to have been the agreed 13 position during the relevant period? 14 A. Yes. 15 Q. It says there that it required prior agreement with G4S 16 and Home Office management. Did you understand that you 17 needed to get both of their agreement or just G4S's 18 agreement? 19 A. At that time, we would only email a member of G4S 20 management. I don't know if they would also forward the 21 request to the Home Office. 22 Q. Just while I remember, because it occurs to me, when 23 talking about repeat visits, if somebody was detained at 24 Brook House, then transferred to the Verne, for example, 25 and then went back to Brook House, would that still</p> <p style="text-align: center;">Page 33</p>	<p>1 A. Yes. Yes, that's our policy. 2 Q. "... may be suffering or may be at risk of suffering 3 significant harm" is obviously language that often tends 4 to be used in safeguarding policies, and things like 5 that. What did you take that to mean? 6 A. I would take that as "at an imminent risk". 7 Q. What sort of risk could that be? 8 A. If someone told us that -- you have to understand that 9 most people in Brook House would tell us that they felt 10 generally hopeless and that they were suffering with 11 anxiety and had low mood. So that would be for most 12 people that we met. But if somebody was talking about 13 committing suicide, had a plan, was displaying any of 14 the manifestations that we'd been trained to recognise, 15 then we would make an immediate disclosure to the 16 centre -- 17 Q. What about -- 18 A. -- and our volunteers would do the same. 19 Q. Okay. What about if somebody said that they were scared 20 of their roommate or somebody else who was on their wing 21 or somebody else in the centre? Would that fall within 22 that, to your view? 23 A. It would, yes. 24 Q. What about if they said they were scared of a member of 25 staff?</p> <p style="text-align: center;">Page 35</p>
<p>1 count as a repeat visit, if you saw them during the 2 first time of detention and their second time of 3 detention? 4 A. I don't think it would, no. 5 Q. If we can stay on that document but go a bit further 6 down to the penultimate paragraph, please, we are going 7 to come on to a bit about safeguarding and referrals and 8 things later, but just while we are on this, you will 9 see that it says: 10 "As part of the GDWG surgery meetings with 11 detainees, it is critical that where any GDWG staff 12 member has reasonable cause to believe that a detainee 13 may be suffering or may be at risk of suffering 14 significant harm, a member of Brook House IRC staff is 15 notified immediately." 16 Did you follow that paragraph? 17 A. We did. In fact, I can remember one meeting when I was 18 in a drop-in when I was extremely concerned about the 19 man I was seeing, and I actually refused to leave the 20 room at the end until one of the members of staff had 21 called Oscar One. 22 Q. Do you remember whether that was during the relevant 23 period? 24 A. It may not have been during the relevant period, sorry. 25 Q. No, it's obviously difficult to date things.</p> <p style="text-align: center;">Page 34</p>	<p>1 A. Yes. 2 Q. We will come back to referrals and stuff later. Just 3 sticking -- coming back to the visits issue. You say in 4 your statement that the rule on repeat visits, as in 5 that you can't have them unless there's exceptional 6 circumstances, hasn't been formally lifted and you have, 7 over time, become used to trying to avoid repeat visits, 8 wherever possible? 9 A. Mmm-hmm. 10 Q. Obviously Brook House is now run by Serco. 11 A. Mmm-hmm. 12 Q. Is that still the position now, that you wouldn't do 13 a repeat visit without permission? 14 A. We haven't had an open -- we haven't raised it as an 15 issue, but we do do repeat visits now. 16 Q. Without needing to seek permission? 17 A. Yes. 18 Q. Now, I want to come on more broadly to the relationship 19 between GDWG and various of the people that worked at 20 Brook House, or with Brook House. You've said in your 21 statement that you had a very good -- that's at 22 paragraph 156, for the transcriber -- collaborative 23 working relationship with welfare officers at 24 Brook House. Can you expand a bit on that? 25 A. I think welfare officers were extremely overworked.</p> <p style="text-align: center;">Page 36</p>

<p>1 They always seemed to have a queue of people or they</p> <p>2 would describe to us they had queues of people waiting</p> <p>3 to see them. So it was in their best interests to</p> <p>4 maintain a good relationship with us because we were</p> <p>5 able to assist them in many different ways. So not just</p> <p>6 in allocating a visitor so that somebody was less</p> <p>7 dependent solely on the support of the welfare office,</p> <p>8 but also it's extremely time consuming reuniting people</p> <p>9 with their property, and, you know, sometimes we would</p> <p>10 go to police stations and collect it for people and we</p> <p>11 would take that off their shoulders.</p> <p>12 Q. So you were essentially able to collaborate because you</p> <p>13 were able to do some of the work that they didn't have</p> <p>14 the resources to do?</p> <p>15 A. Yes.</p> <p>16 Q. Now, you describe also your relationship with front-line</p> <p>17 detention staff. How would you describe that</p> <p>18 relationship with the DCOs and DCMs at Brook House?</p> <p>19 A. I think there were some DCOs -- first of all, I should</p> <p>20 say most of our contact was with DCOs, because we didn't</p> <p>21 have access to the wings, we weren't in the main body of</p> <p>22 the centre. The only time we -- sorry, ACOs. Most of</p> <p>23 our contact was with ACOs. We only came into contact</p> <p>24 with DCOs when we were on the corridor, on the visits</p> <p>25 corridor.</p> <p style="text-align: center;">Page 37</p>	<p>1 officers, we could have said, "Oh, I've got this person</p> <p>2 down. They are on E wing now. Could someone bring them</p> <p>3 up, please?", and that would have worked fine, but it</p> <p>4 was usually, "They're in E wing. They can't see you".</p> <p>5 Q. So you were sometimes told you couldn't see someone</p> <p>6 because they were too vulnerable?</p> <p>7 A. Yes.</p> <p>8 Q. You do say in your statement that there were some</p> <p>9 positive reports about staff and that this wasn't the</p> <p>10 norm. Was this generally positive reports about</p> <p>11 individual members of staff or was it about staff as</p> <p>12 a whole?</p> <p>13 A. Individual members.</p> <p>14 Q. Turning to the relationship between G4S and Home Office</p> <p>15 management, you say that the relationship was generally</p> <p>16 poor. In your mind, was it equally poor with G4S and</p> <p>17 with the Home Office or was there a significant</p> <p>18 difference in your relationship with either of them?</p> <p>19 A. Every time -- so, again, this is a question for James.</p> <p>20 But every time he had a meeting with G4S, the</p> <p>21 Home Office were also present, and they were displaying</p> <p>22 the same views and behaviours.</p> <p>23 Q. In your statement, at paragraphs 163 to 164, you echo</p> <p>24 James Wilson's view that:</p> <p>25 "... the behaviour of managers towards GDWG, the</p> <p style="text-align: center;">Page 39</p>
<p>1 It was really important for our charity that we</p> <p>2 built the best relationship that we could with them. We</p> <p>3 had no gripe with them. We wanted to be able to help</p> <p>4 people in detention. Having a good relationship with</p> <p>5 them was by far the easiest way for us to do that.</p> <p>6 When we took on new visitors, we'd say, "When you're</p> <p>7 going into the centre, if it's particularly slow or you</p> <p>8 see something that is trying your patience, please don't</p> <p>9 express that. You know, remain courteous and patient at</p> <p>10 all times. Come back and report any concerns to the</p> <p>11 office and we will raise the issues".</p> <p>12 Q. You do say in your statement, at paragraph 157, you say:</p> <p>13 "However, the treatment of detained people by</p> <p>14 front-line staff ..."</p> <p>15 Some of which you have described in your statement:</p> <p>16 "... impacted on GDWG's working relationship with</p> <p>17 them."</p> <p>18 A. Mmm-hmm.</p> <p>19 Q. In what way did it impact on it?</p> <p>20 A. So I'll just give you an example. People would make an</p> <p>21 appointment to come and see us at a drop-in. Sometimes</p> <p>22 that person might then be moved to E wing or CSU. They</p> <p>23 might be quite poorly in E wing and need an officer to</p> <p>24 physically bring them to the drop-in corridor.</p> <p>25 If we had a good relationship with Brook House</p> <p style="text-align: center;">Page 38</p>	<p>1 criticisms and the attempts to restrict the number of</p> <p>2 visits and the type of work we do had an impact on how</p> <p>3 we have advocated for detained [persons]".</p> <p>4 In what way did it have that impact, in your</p> <p>5 experience?</p> <p>6 A. Sorry, just let me read that paragraph.</p> <p>7 Q. Yes, of course.</p> <p>8 A. So this relates to the issue of complaints, and if</p> <p>9 a person in detention was apprehensive of raising</p> <p>10 a complaint themselves, they might ask us if we could</p> <p>11 raise it for them. This is not of a threshold of</p> <p>12 a safeguarding issue.</p> <p>13 Q. Right.</p> <p>14 A. In this case, because there was a kind of a culture of</p> <p>15 fear at the time, the Home Office and G4S were very</p> <p>16 effective at silencing GDWG with the threat of removing</p> <p>17 our drop-ins.</p> <p>18 Q. Do you think that they were trying to silence GDWG?</p> <p>19 A. I believe so, yes. Because of that, those kind of</p> <p>20 routine complaints -- I'm not talking about ones on the</p> <p>21 threshold of a safeguarding issue --</p> <p>22 Q. Just to get some examples, routine complaints, might we</p> <p>23 be talking about, you know, whether they have got</p> <p>24 toothpaste or clothing or conditions in their cell or</p> <p>25 room? Would it be that type of thing?</p> <p style="text-align: center;">Page 40</p>

<p>1 A. General conditions. We would say to people, "Please, 2 you know, speak to your legal representative. They may 3 be able to raise those issues with the centre more 4 effectively than us". 5 Q. You say in your statement that you felt forced to advise 6 people to go via their legal representatives because 7 you, as an organisation, were fearful of antagonising 8 those at Brook House in case they punished you for 9 speaking out by restricting your access to clients. Was 10 that something that you felt during the relevant period? 11 A. Yes, it was. 12 Q. You have been asked to comment in your statement, at 13 paragraph 166, on some minutes which refer to comments 14 from G4S and the Home Office that they had reservations 15 about some less-appropriate actions from GDWG. That's 16 quoted in your statement at paragraph 166. For the 17 transcriber, it's <IMB000003> pages 3 to 4. You come on 18 to say, at paragraph 167 of your statement, what you 19 think was meant by that, and you say that you think it 20 refers to some Twitter posts by a staff member back in 21 2013, and also the fact that one of your staff members, 22 Naomi Blackwell, gave a witness statement as part of 23 a detained person's judicial review. Is that right? 24 A. Yes. 25 Q. I will be able to ask Mr Wilson more about this</p> <p style="text-align: right;">Page 41</p>	<p>1 A. I think very often we are literally the only people in 2 a position to see what's happening to an extremely 3 vulnerable person, or maybe somebody lacking capacity 4 isn't going to be reaching out, advocating for 5 themselves, making external contacts beyond the four 6 walls of the detention centre. In those circumstances, 7 we are the only people who can bear witness. So if we 8 can't write a statement saying, "This is what we see", 9 then no-one will ever know what's happening to that 10 person. They're literally invisible. 11 Q. Hypothetically, during the relevant period, 2017, if you 12 had been asked to provide a statement in support of 13 someone whom you'd visited, do you think that you would 14 have done so or do you think that you would have not 15 done so? 16 A. I would have had to ask the director. He may have had 17 to consult with the trustees. It wouldn't have been 18 something I would have felt I had licence to do. 19 Q. You also give another example in your statement of what 20 you think they meant by "less appropriate actions" such 21 as a volunteer visitor who provided surety as part of 22 a bail application. I don't need to go into that in 23 detail. But you say overall at paragraph 169 of your 24 statement: 25 "... it felt to me that G4S's continued reference to</p> <p style="text-align: right;">Page 43</p>
<p>1 tomorrow, but were you, yourself, aware of a negative 2 reaction towards GDWG as a result of Ms Blackwell 3 providing that statement? 4 A. This is a question for James, but I do believe he had 5 a meeting with G4S and the Home Office where they were 6 particularly aggressive about the fact that she had done 7 that. 8 Q. Do you know, from your personal experience, whether, 9 since then, GDWG staff have provided witness statements 10 in support of litigation brought by any detainees about 11 detention, other than the one that James Wilson provided 12 in 2018? 13 A. I believe we have, but only very rarely, in 14 extraordinary circumstances. It's not something we 15 regularly do. 16 Q. Have you ever communicated to staff, or has it ever been 17 communicated to you, that you shouldn't do this because 18 it might antagonise the Home Office or G4S? 19 A. Not recently, no. 20 Q. You say in your statement, talking about these issues, 21 that there are obvious concerns about trying to stymie 22 such evidence. It might be obvious, but if you can 23 help, what are the concerns that you see about trying to 24 prevent GDWG staff giving evidence in support of 25 detained people?</p> <p style="text-align: right;">Page 42</p>	<p>1 these incidents was a way of exerting control, and 2 justifying the position they wished to take, which was 3 to curtail our activities and therefore any criticism of 4 them, or, worst of all, reduce the number of removals. 5 This attitude and approach prevented a more positive 6 working relationship and meant that Brook House managers 7 could not learn from the information we could provide to 8 them." 9 Do you have anything to add to that? 10 A. No. I think that's very clear. I just -- when you 11 consider, at that time, the number of visitors we had, 12 the number of visits they were doing, the number of 13 relationships they were developing -- 14 Q. When you say "the number", do you mean that there were 15 lots? 16 A. There were lots. Sometimes you'd go in the visits room 17 and every single visitor would be a GDWG visitor. Think 18 of all of that work we were doing, and it was beautiful 19 work, you know, it was connecting with people in the 20 most difficult times, making transformational 21 relationships in a context that was pretty brutal, it 22 was bringing humanity to a very, very difficult 23 situation. You know, that's something to be celebrated, 24 not to find the one or two misdemeanours that we may 25 have committed four years ago to give us a reason for</p> <p style="text-align: right;">Page 44</p>

<p>1 denying us better connection with them. It just -- it</p> <p>2 was really hard to understand.</p> <p>3 Q. I know you say it's hard to understand, but I'm asked on</p> <p>4 behalf of Duncan Lewis and their clients about whether</p> <p>5 you have any view on why G4S took this approach to you?</p> <p>6 A. There was a -- you've heard other witnesses saying there</p> <p>7 was a culture in the centre that was not positive, and</p> <p>8 I think this is a manifestation of that culture.</p> <p>9 Q. Okay. I'm going to come on to that now, because you</p> <p>10 refer in your statement, at paragraph 171, to a comment</p> <p>11 that you made to the interviewers from Verita, the</p> <p>12 Lampard Inquiry, that Brook House management was</p> <p>13 a closed culture. If we can bring up on screen</p> <p>14 <VER000249> at page 15. Chair, that's at your tab 11.</p> <p>15 Is there a problem getting it up?</p> <p>16 EPE OPERATOR: I don't have it.</p> <p>17 MR LIVINGSTON: I can ask you about it. It was <VER000249>,</p> <p>18 but if you don't have it, I can ask about the contents</p> <p>19 anyway, because you have extracted them in your</p> <p>20 statement, I think. We can come back to it, if</p> <p>21 necessary, later.</p> <p>22 This is where you said, Ms Pincus, that Brook House</p> <p>23 management was a closed culture. I'm just going to</p> <p>24 check the exact wording, so that I'm not misleading</p> <p>25 anyone.</p> <p style="text-align: center;">Page 45</p>	<p>1 at your tab 15. The previous page shows that this was</p> <p>2 an email on 7 August 2017 from you to Dan Haughton. If</p> <p>3 we can go back to page 33, please, it says:</p> <p>4 "Hello Dan.</p> <p>5 "I met a detainee that I was concerned about last</p> <p>6 week and in view of the symptoms of stress he is</p> <p>7 manifesting, I wonder whether you would consider moving</p> <p>8 him to Tinsley House where the environment might give</p> <p>9 him fewer triggers for post-traumatic stress from his</p> <p>10 time of imprisonment ... Obviously you know the case</p> <p>11 much better than I, but I would appreciate any</p> <p>12 consideration you can give the request particularly at</p> <p>13 a time when his stress is likely to escalate with his</p> <p>14 partner being about to have a baby without him there.</p> <p>15 "With many thanks and all good wishes."</p> <p>16 Is that the email you were talking about?</p> <p>17 A. Yes. Chair, I was trying to be as polite as I possibly</p> <p>18 could and make a request, and the response that came</p> <p>19 back -- maybe you could --</p> <p>20 Q. The response, I think, is on the previous page. Yes,</p> <p>21 there is a response, or an email, that was sent from</p> <p>22 Steve Skitt to James Wilson about this email. Is that</p> <p>23 what you're referring to? Or is there a specific</p> <p>24 response to you?</p> <p>25 A. Yes, that's the one.</p> <p style="text-align: center;">Page 47</p>
<p>1 If we could zoom in on paragraphs 177 and 179,</p> <p>2 please, towards the top third. You say -- you said at</p> <p>3 the top before that, "A closed culture" and then you say</p> <p>4 you don't like focusing on individuals. Then you say</p> <p>5 "The whole thing is the broken culture", and you say</p> <p>6 "That reflects the culture of disbelief of</p> <p>7 the Home Office".</p> <p>8 So, first of all, looking at the sort of closed</p> <p>9 culture, the broken culture, what did you mean by that?</p> <p>10 A. I meant that the institution was not a listening one,</p> <p>11 and, therefore, it was not a learning one. May I give</p> <p>12 an example from my witness statement?</p> <p>13 Q. Yes, please do.</p> <p>14 A. So in the witness statement, there's an example of an</p> <p>15 email that I sent to management asking whether they</p> <p>16 would consider moving someone from Brook House to</p> <p>17 Tinsley House. Tinsley House was a much more humane</p> <p>18 environment than Brook House, and this was a man who was</p> <p>19 in crisis, whose partner was about to give birth.</p> <p>20 I felt that, if he were to be moved to a different</p> <p>21 environment that wasn't re-traumatising, because he'd</p> <p>22 been imprisoned in his own country, he might cope with</p> <p>23 the coming few weeks --</p> <p>24 Q. We can actually bring that up on screen as well, if</p> <p>25 possible. It's <GDW000003> at page 33. Chair, that's</p> <p style="text-align: center;">Page 46</p>	<p>1 Q. So it says:</p> <p>2 "James, please see below and your staff contacting</p> <p>3 the IMB ..."</p> <p>4 A. No, that's a different --</p> <p>5 Q. That's a separate one, isn't it?</p> <p>6 A. That's a separate one.</p> <p>7 Q. Let me find the response.</p> <p>8 A. No, sorry, I must be remembering a different disclosure,</p> <p>9 when James was told that my email had been inappropriate</p> <p>10 because I was assuming clinical knowledge about</p> <p>11 post-traumatic stress that was inappropriate for me as</p> <p>12 a GDWG employee.</p> <p>13 Q. You say in your statement, actually, that this email</p> <p>14 from you was discussed during a meeting on 18 August and</p> <p>15 that Steve Skitt complained that your email was an</p> <p>16 example of a concern raised to the right person but in</p> <p>17 the wrong way because it was not for you to diagnose</p> <p>18 a risk of PTSD or to request the move. Is that right?</p> <p>19 A. That's right. So, I mean, first of all, I had actually</p> <p>20 attended a training on PTSD, which you mentioned at the</p> <p>21 beginning, but, second of all, if I was expressing</p> <p>22 something inappropriately, that was not the point. The</p> <p>23 point was, his concern should have been directed at how</p> <p>24 well the person -- the detained person was, and to focus</p> <p>25 on the tone of my email rather than the issue of</p> <p style="text-align: center;">Page 48</p>

12 (Pages 45 to 48)

<p>1 the well-being of the detained person seemed to me</p> <p>2 illustrates that it was a broken culture.</p> <p>3 Q. You have referred to "broken culture", "closed culture",</p> <p>4 and you have also referred to a "culture of disbelief</p> <p>5 within the Home Office". What do you mean by that?</p> <p>6 A. So people felt -- when we met people in detention, they</p> <p>7 would say that, when they spoke to people in the</p> <p>8 Home Office, and when they spoke to people in G4S,</p> <p>9 people didn't believe what they said.</p> <p>10 Q. You say in your statement that, at the time -- so you</p> <p>11 first of all talk about this email that you sent</p> <p>12 in August. Then you say that, at the time, many</p> <p>13 detained people had problems which you wanted to raise</p> <p>14 with Brook House management but which James Wilson</p> <p>15 thought it unwise to raise for fear of antagonising the</p> <p>16 Home Office. Was this case one of many similar ones,</p> <p>17 but this is one of the only ones that you actually</p> <p>18 emailed G4S about?</p> <p>19 A. This was such a delicate -- such a reasonable request</p> <p>20 that James, in his judgment, thought they could not</p> <p>21 possibly object to it. So he let me send the email.</p> <p>22 Q. Just to check, was there a sort of filter: so you have</p> <p>23 met with someone, you have a concern and you check with</p> <p>24 James whether you should email or whether he should</p> <p>25 email or whether someone should email? You wouldn't</p> <p style="text-align: center;">Page 49</p>	<p>1 around a bit -- at paragraph 83 you say that when</p> <p>2 detained people mentioned that there had been</p> <p>3 mistreatment, they would usually say that they didn't</p> <p>4 want a complaint to be made. What reasons would they</p> <p>5 give you, if they gave you reasons, for not wanting to</p> <p>6 make a complaint?</p> <p>7 A. So the most important thing to someone in detention is</p> <p>8 what's going to happen to them in the future: how long</p> <p>9 they are going to be detained; whether they will be</p> <p>10 returned to their family; whether they will be returned</p> <p>11 to another country where maybe they fear for their</p> <p>12 safety.</p> <p>13 The people who make the decisions about that are the</p> <p>14 Home Office.</p> <p>15 People learn from a young age to be acquiescent to</p> <p>16 the people making decisions about their future. It</p> <p>17 would be like a child challenging a teacher. The stakes</p> <p>18 were so high for people, they would tolerate a great</p> <p>19 deal before they would wish to bring something to the</p> <p>20 attention of the Home Office and risk putting their head</p> <p>21 above the parapet and any reprisals. And I'm not saying</p> <p>22 there would be reprisals, but that was a very real fear</p> <p>23 that people had.</p> <p>24 Q. Was that something that people actually expressed to</p> <p>25 you, that they -- something had happened but they didn't</p> <p style="text-align: center;">Page 51</p>
<p>1 just go ahead and email yourself?</p> <p>2 A. At that time, we would check with the director, because</p> <p>3 he was -- he wished to oversee our relationship with G4S</p> <p>4 because it felt so rocky.</p> <p>5 Q. Now, more broadly, talking about this "broken culture"</p> <p>6 or "closed culture", a "culture of disbelief", you say</p> <p>7 in your statement, at paragraph 176, that if Brook House</p> <p>8 managers had adopted a relationship which involved</p> <p>9 openness and a willingness to listen, that you would</p> <p>10 have been able to provide valuable insights that would</p> <p>11 have been beneficial both to detained people and in the</p> <p>12 running of the centre. In what way do you think it</p> <p>13 would have benefited the running of the centre?</p> <p>14 A. I think we -- not just because staff were meeting people</p> <p>15 in drop-in, but because our visitors were seeing people</p> <p>16 weekly, they could gauge the mood of the centre, they</p> <p>17 could tell when people were frustrated by different</p> <p>18 sequences of events.</p> <p>19 Q. And you think that if you had been able to have</p> <p>20 communicated that, that that would have helped G4S</p> <p>21 and/or the Home Office to sort of know what was going</p> <p>22 on?</p> <p>23 A. Yes.</p> <p>24 Q. I want to come on to a separate topic now about</p> <p>25 complaints. This your statement -- sorry I'm jumping</p> <p style="text-align: center;">Page 50</p>	<p>1 want to make a complaint because they were worried about</p> <p>2 their immigration case or what might happen to them?</p> <p>3 A. Yes.</p> <p>4 Q. If someone, or when someone said that, did you see it as</p> <p>5 your role to try and sort of reassure them or how would</p> <p>6 you respond to that?</p> <p>7 A. We would explain the different ways that they could make</p> <p>8 a complaint. So they could make an anonymous complaint.</p> <p>9 I think there was a box, like a letterbox, in the</p> <p>10 centre. They could post a message in there. If they</p> <p>11 couldn't write or their English wasn't very good, they</p> <p>12 could speak it to us, we could actually write it down</p> <p>13 for them and give them a piece of paper for them to put</p> <p>14 in the box. So we would explore the options for people</p> <p>15 as best we could.</p> <p>16 Q. You come on to say in your statement -- this is still at</p> <p>17 paragraph 83:</p> <p>18 "If the disclosure raised a safeguarding concern, we</p> <p>19 would request the detained person's consent to inform</p> <p>20 Brook House's Safer Community Team. If consent was</p> <p>21 refused, but we continued to believe that there was</p> <p>22 a safeguarding risk about which we were required to</p> <p>23 breach confidentiality, we would raise this with the</p> <p>24 Safer Community Team."</p> <p>25 So what constituted a safeguarding concern or</p> <p style="text-align: center;">Page 52</p>

<p>1 a safeguarding risk? Is that the sort of thing we were</p> <p>2 talking about earlier, about significant risk of harm?</p> <p>3 A. Yes.</p> <p>4 Q. So, in that circumstance, you'd ask if they were okay</p> <p>5 with you raising it, but, even if they weren't, you had</p> <p>6 a duty, as you saw it, to pass that on?</p> <p>7 A. We did, and also our visitors were trained to have those</p> <p>8 conversations, to say to someone, you know, "I am your</p> <p>9 befriender, but you have told me something that affects</p> <p>10 your safety. You have made this disclosure to me.</p> <p>11 I now have to inform someone in the centre".</p> <p>12 Q. We will come on to some specific examples in due course,</p> <p>13 but when you're looking at safeguarding concerns, and we</p> <p>14 have talked about this significant risk of harm,</p> <p>15 presumably you're looking very much at the risk to them</p> <p>16 at the moment and potentially any risk in the future,</p> <p>17 rather than what might have happened in the past; is</p> <p>18 that fair?</p> <p>19 A. It is fair.</p> <p>20 Q. So is it right to say that if somebody told you that</p> <p>21 something bad had happened to them three months before,</p> <p>22 but that they were fine now and, you know, they were</p> <p>23 content or they didn't see themselves at any risk</p> <p>24 anymore, would you still see that as the same type of</p> <p>25 safeguarding concern or would that be different because</p> <p style="text-align: center;">Page 53</p>	<p>1 is that right?</p> <p>2 A. Yes, although, obviously, we weren't acting as legal</p> <p>3 representatives.</p> <p>4 Q. This is the general approach of what GDWG would do in</p> <p>5 relation to a complaint. Was this process ever written</p> <p>6 out somewhere? Was there ever a policy which said, you</p> <p>7 know, "If you hear this, you have to do this", or</p> <p>8 anything like that?</p> <p>9 A. There is a safeguarding policy and there was one at that</p> <p>10 time, yes.</p> <p>11 Q. At the relevant time, okay. Was that communicated to</p> <p>12 staff and volunteers?</p> <p>13 A. Yes.</p> <p>14 MR LIVINGSTON: Chair, I think that might be an appropriate</p> <p>15 moment to have a break, if that's okay.</p> <p>16 THE CHAIR: Absolutely.</p> <p>17 MR LIVINGSTON: Maybe returning at -- my maths has gone, but</p> <p>18 25 to?</p> <p>19 THE CHAIR: So has mine. Shall we make it 11.40 am?</p> <p>20 MR LIVINGSTON: Yes.</p> <p>21 THE CHAIR: See you then.</p> <p>22 (11.23 am)</p> <p>23 (A short break)</p> <p>24 (11.43 am)</p> <p>25 MR LIVINGSTON: Ms Pincus, before the break, we were talking</p> <p style="text-align: center;">Page 55</p>
<p>1 they weren't, as you might see it, at risk at the time?</p> <p>2 A. I think it's not black and white, so it would depend on</p> <p>3 the circumstances. Obviously, all of these calls need</p> <p>4 kind of fine and sensitive judgments, and we would take</p> <p>5 advice where necessary.</p> <p>6 Q. Is that legal advice, or is that --</p> <p>7 A. West Sussex Adult Social Care. We can call them about</p> <p>8 safeguarding issues.</p> <p>9 Q. You say where a detained person wished to raise</p> <p>10 a complaint, you would explain their options and you</p> <p>11 would offer to help to write the complaint and</p> <p>12 potentially make the complaint yourselves, if necessary;</p> <p>13 is that right?</p> <p>14 A. Yes.</p> <p>15 Q. But you say that your preferred approach was to</p> <p>16 encourage or assist them to share their concerns with</p> <p>17 their legal representatives; is that right?</p> <p>18 A. At that time.</p> <p>19 Q. But, as you say at paragraph 88, many detained people</p> <p>20 had no legal representatives, in your experience; is</p> <p>21 that right?</p> <p>22 A. Yes. I think about a third of people didn't.</p> <p>23 Q. So, in those circumstances, you might be more likely to</p> <p>24 offer to do it yourselves, rather than -- because they</p> <p>25 didn't have someone else to do the complaint for them;</p> <p style="text-align: center;">Page 54</p>	<p>1 a little bit about the safeguarding policy and the</p> <p>2 approach that you would take to complaints or disclosing</p> <p>3 safeguarding concerns.</p> <p>4 Jamie MacPherson said in evidence yesterday that</p> <p>5 visitors were encouraged to report issues raised by</p> <p>6 detained persons with them to central office. Would</p> <p>7 that have been to your team?</p> <p>8 A. Yes, so we are one office.</p> <p>9 Q. The central office just meaning the organisation,</p> <p>10 basically?</p> <p>11 A. Yes, six members of staff, yes.</p> <p>12 Q. Is there a sort of central email address or would it</p> <p>13 just be whoever he knows that's in the team, he might</p> <p>14 just email one of you?</p> <p>15 A. When we met somebody for the first time in a drop-in,</p> <p>16 whichever member of staff met that person and made the</p> <p>17 connection would then connect them with a visitor and</p> <p>18 become the point of contact for that person.</p> <p>19 Q. So a sort of liaison staff member for each person?</p> <p>20 A. So they would either contact the person who was</p> <p>21 concerned with the person they were visiting or, if they</p> <p>22 identified it as a safeguarding issue, they might have</p> <p>23 gone straight to the director at that time, who was the</p> <p>24 safeguarding lead.</p> <p>25 Q. So you had a safeguarding lead within your organisation,</p> <p style="text-align: center;">Page 56</p>

1 and that was James Wilson at the time; is that right?

2 **A. Yes, and now it's me.**

3 Q. Jamie MacPherson also said that central office would

4 investigate, if they deemed it appropriate to do so, but

5 that you would have to pick and choose which complaints

6 you'd raise with G4S because, otherwise, he said, you'd

7 be constantly complaining. What do you say about that?

8 Is that right?

9 **A. Yes. Probably every single person that we met, for**

10 **example, would complain about the food. So we wouldn't**

11 **be complaining to G4S every time we had a complaint**

12 **about the food.**

13 Q. Just to get an idea --

14 **A. But if someone was a diabetic and they needed**

15 **a particular diet and we thought, you know, their health**

16 **was suffering as a result, then we might raise the issue**

17 **with the centre. But that would probably be with**

18 **healthcare.**

19 Q. Just to get an idea of the sort of filtering process,

20 I guess, presumably, as far as you understand,

21 a detained person chats to a visitor and then the

22 visitor won't report every thing that the person said to

23 central office, but presumably you would expect the

24 visitor to filter out some things and only report some

25 things, some concerns, to you; is that right?

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1 **A. If the visitor had a matter of concern, they would give**

2 **us a call. We were very approachable. We made sure**

3 **they knew that, better to be in touch with us over**

4 **something that was trivial than to hold that worry to**

5 **themselves.**

6 Q. During the relevant period, I think you've said that you

7 would go to -- you would check with James Wilson before

8 you went to G4S to raise a complaint. Does that apply

9 to things raised by visitors as well?

10 **A. Yes.**

11 Q. So it would be essentially James Wilson's decision at

12 that time whether something went to G4S or whether you

13 sort of just kept it?

14 **A. That's correct.**

15 Q. I understand -- this is a rule 10 from G4S saying that

16 they understand that there's now a form to be filled in

17 for safeguarding concerns. Does such a form -- first of

18 all, is that right? Do you have a form now that you

19 fill in if there's a safeguarding concern?

20 **A. Do you mean a form within our organisation?**

21 Q. Yes. Well, or a G4S form that you're meant to fill in?

22 **A. I'm not aware of any G4S forms now.**

23 Q. Okay. Or Serco forms?

24 **A. Serco, sorry. If I raise a safeguarding issue with**

25 **Serco, I write "Safeguarding issue" in the heading of**

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1 **the email.**

2 Q. Okay. So it's still done by email? There's no separate

3 form?

4 **A. It's still done by email. We, as an organisation, have**

5 **safeguarding forms and those can be raised by a member**

6 **of staff or a visitor or a trustee.**

7 Q. Did you have them at the relevant period as well?

8 **A. I don't think we did, no.**

9 Q. Okay, that's a newer thing.

10 **A. Mmm-hmm.**

11 Q. Do you know how many safeguarding concerns were raised

12 by GDWG or volunteers with G4S during the relevant

13 period?

14 **A. I'm sorry, I don't.**

15 Q. Did you, as an organisation, have any monitoring

16 processes in place to ensure the safeguarding procedures

17 were being followed by staff and volunteers, so anything

18 to check that a visitor is correctly passing things on?

19 Was there any way you had of monitoring that?

20 **A. So we had training for our visitors, and -- it's hard to**

21 **remember in the relevant period. I can tell you what we**

22 **do now, if that's helpful.**

23 Q. Yes, that's helpful as well.

24 **A. So we have a safeguarding strategy. That includes that**

25 **all staff have to attend safeguarding training once**

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1 **a year. Safeguarding is on the agenda of every staff**

2 **meeting, every trustee meeting and every local visitor**

3 **group meeting. Those local group meetings are every six**

4 **weeks, where visitors come together for peer support**

5 **with a member of staff.**

6 Q. Is there any way of checking that a visitor is passing

7 on serious concerns?

8 **A. Once we allocate a detained person to a visitor, that**

9 **doesn't mean that then the office absents ourselves from**

10 **having a connection with a detained person. So we**

11 **maintain that connection. We ask them how visits are**

12 **going. We are not checking up on our visitors, but just**

13 **to make sure everything is okay.**

14 Q. So you sort of hope that something would come up there?

15 **A. So they would be able to tell us, yes.**

16 Q. One of the things you refer to in relation to complaints

17 in your statement -- this is paragraph 86, for the

18 transcriber -- is you refer to detained persons being

19 unwilling to make complaints about other detained people

20 by whom they were being targeted. What, if anything, do

21 you think could be done to improve willingness to make

22 complaints about other detained people?

23 **A. I think the only way that could happen is if there was**

24 **an atmosphere of trust. So if people knew that if they**

25 **spoke to an officer, it would be in confidence; if they**

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15 (Pages 57 to 60)

<p>1 knew that a resulting action would be proportional -- 2 proportionate, sorry, I think it would be -- it's 3 probably not a very helpful answer. 4 Q. That's your answer, so that's helpful. 5 A. Yes. 6 Q. You give, at paragraph 87, some of the reasons why 7 people were reluctant to make complaints, in your 8 experience, and they will all be considered, and, in 9 summary, those were including that people would 10 sometimes be too unwell or vulnerable to make 11 complaints, some of them viewed complaining as pointless 12 or they were dissuaded by detention staff. What do you 13 mean by "dissuaded by detention staff"? 14 A. Detention staff would tell them not to -- don't make the 15 complaint or withdraw the complaint. 16 Q. Explicitly? 17 A. Explicitly. 18 Q. Were they ever given a reason or told why they should 19 withdraw a complaint or not make a complaint, to your 20 knowledge? 21 A. I think they were trying to prevent greater 22 accountability, but I don't know -- I can't remember the 23 detail of the conversations. 24 Q. Are there any staff members that you were specifically 25 told had been dissuading people from making complaints</p> <p style="text-align: center;">Page 61</p>	<p>1 at least a sort of sketch of how many times? Was it 2 a very frequent thing, was it very rare? 3 A. It's hard to say because I find it so shocking that it 4 would stick in my mind. So it would probably be more 5 prominent in my mind than actually the number of times 6 would belie. So it may only have been one a month. 7 Q. Okay, one a month -- 8 A. But, to us, one instance of that would be shocking. 9 Q. But you think one a month, is that a fair estimate? We 10 are not going to hold you to that. It's an estimate. 11 A. At that time, yes. 12 Q. Is that something that still is an issue now, that 13 people say they're being dissuaded from making 14 complaints or told to withdraw complaints? 15 A. I think it happened rarely outside the relevant period. 16 Q. But now, looking at the position now? 17 A. Now it's hard for me personally to say, because I'm not 18 doing the drop-ins. 19 Q. Okay. 20 A. So I'd have to ask my colleagues. 21 Q. Now I want to come on to the issue of physical 22 mistreatment of detained persons. I think you've 23 already answered this, but, generally, were staff within 24 your organisation, or volunteers within your 25 organisation, told that they should ask detained people</p> <p style="text-align: center;">Page 63</p>
<p>1 or telling people to withdraw complaints? 2 A. Not by name. This is one of the problems, that I don't 3 think detained people were always aware of the name of 4 the person that was addressing them. So I don't think 5 people wore visible name labels. I think they had the 6 names on kind of lanyards that would flick backwards and 7 forwards or be under a jumper. So they wouldn't always 8 know the name of the person who had been -- they'd had 9 an encounter with. 10 Q. Do you recall, is that specific issue, so about staff 11 telling people not to make complaints or dissuading 12 people from making complaints, was that something that 13 you or your organisation ever raised with G4S or the 14 Home Office? 15 A. We didn't, because, very often, when people made 16 complaints, and when they make complaints now, they are 17 ruled to be unsubstantiated. So if it's the word of 18 a detained person against an officer whose name they 19 don't know, it's very difficult to take that complaint 20 further. 21 Q. Just so that we have an idea of the sort of scale of 22 this specific issue about dissuading or telling people 23 to withdraw, a suggestion that they withdraw, can you 24 give us any indication for how many times you were told 25 that, ideally during the relevant period, but, if not,</p> <p style="text-align: center;">Page 62</p>	<p>1 whether they'd been mistreated or were they just trained 2 to listen and, if there was a report, react to that? 3 A. We didn't have a checklist of questions to ask people. 4 We weren't mimicking the Home Office. We were a welfare 5 group. Our conversations were led by the people that we 6 were visiting. 7 Q. So there was no standard question of, you know, "Are you 8 suffering any mistreatment?" 9 A. No. 10 Q. We have spoken a bit about the sort of process if there 11 was a safeguarding concern. Now, an allegation of 12 mistreatment, starting with physical mistreatment. 13 Presumably, that might be a safeguarding concern or it 14 might not. Is that right? 15 A. I think it would relate to the safety of a person. 16 Q. Okay. 17 A. Yes. 18 Q. You've already told us about what the process was if you 19 had a significant risk, if you thought someone was at 20 significant risk. I mean, being quite specific, if 21 someone said to you a month ago they were assaulted by 22 a staff member, would you consider that to be 23 a safeguarding concern? 24 A. I think I would, yes. 25 Q. In your statement, at paragraph 58 -- again, sorry for</p> <p style="text-align: center;">Page 64</p>

<p>1 jumping around, but it is page 23 -- you say that you're</p> <p>2 aware of five detained people who told GDWG they'd been</p> <p>3 physically mistreated by staff during the relevant</p> <p>4 period; a further three who alleged mistreatment by</p> <p>5 escort staff; and some others who alleged mistreatment</p> <p>6 outside of the relevant period.</p> <p>7 You have provided anonymised summaries of these</p> <p>8 reports at <GDW000010>, if we can bring that up on</p> <p>9 screen, please. Chair, could I ask for this to be</p> <p>10 adduced in full, please?</p> <p>11 Ms Pincus, I appreciate that you don't have the</p> <p>12 permission of detained people to provide any more</p> <p>13 details of these incidents than is set out, so I'm not</p> <p>14 going to ask you in any more detail about what happened</p> <p>15 to them, but I do want to understand a bit more about</p> <p>16 the response of GDWG and how those allegations came</p> <p>17 about.</p> <p>18 But I'm right in saying that, on some of</p> <p>19 the occasions within this table, staff or volunteers of</p> <p>20 GDWG were told about mistreatment at the time?</p> <p>21 A. Mmm-hmm.</p> <p>22 Q. I'm going to go through a few of the examples. So</p> <p>23 example 1, we can see that it refers to a detained</p> <p>24 person telling your organisation that he'd been sworn</p> <p>25 at, punched in the chest and pushed to the ground by</p> <p style="text-align: center;">Page 65</p>	<p>1 Q. Understood. Do you know whether the complaint that was</p> <p>2 sent to the Home Office and IMB led to any</p> <p>3 investigation?</p> <p>4 A. I don't know that, sorry. I'd have to look at our</p> <p>5 records.</p> <p>6 Q. As far as you know, because it is not written here,</p> <p>7 there is no safeguarding referral or form completed on</p> <p>8 this occasion?</p> <p>9 A. It doesn't appear so from the summary.</p> <p>10 Q. If we can go to example 4, please. This refers to</p> <p>11 a detained person who you say appeared as very</p> <p>12 vulnerable, complained of mistreatment, and then, if we</p> <p>13 go over to the next page, please, where that's</p> <p>14 continued, it notes:</p> <p>15 "A few days later, in a phone call ... he told GDWG</p> <p>16 that he had been hit on the left side of his head by</p> <p>17 a staff member. [He] was not fully coherent and did not</p> <p>18 provide clear information ..."</p> <p>19 You spoke with him again. You say it appeared</p> <p>20 during that call that he was self-harming. You spoke</p> <p>21 with him again and he presented with delusions and</p> <p>22 paranoia. You understand that his solicitor raised</p> <p>23 concerns but there was no response within a week. And</p> <p>24 then you sent a further email, and then, six days later,</p> <p>25 you received an update that they'd been transferred to</p> <p style="text-align: center;">Page 67</p>
<p>1 a member of staff. And you say that you sent</p> <p>2 a complaint to the Home Office, the IMB and you referred</p> <p>3 him to a solicitor. Were you making those complaints on</p> <p>4 his behalf or was that a sort of safeguarding referral</p> <p>5 or both? Do you remember?</p> <p>6 A. Well, a safeguarding referral would be on his behalf.</p> <p>7 Q. Okay. A safeguarding referral would presumably be to</p> <p>8 G4S, telling them that somebody is a risk of harm.</p> <p>9 Whereas this refers to a complaint. So is that</p> <p>10 different?</p> <p>11 A. Oh, I see what you mean. Did we flag it up as</p> <p>12 a complaint or as a safeguarding issue?</p> <p>13 Q. Exactly. So it's -- a complaint to the Home Office or</p> <p>14 IMB or from a solicitor might be, "This thing happened</p> <p>15 to me and I want redress. I want it to be</p> <p>16 investigated". Whereas, presumably -- and this is what</p> <p>17 I've been trying, perhaps clumsily, to get out --</p> <p>18 there's a bit of a difference between that and</p> <p>19 a safeguarding concern which is you saying, "G4S Safer</p> <p>20 Community Team or management, this person is at risk".</p> <p>21 What I want to understand is whether you know whether,</p> <p>22 in this case, there was a safeguarding referral made or</p> <p>23 whether it was just a complaint?</p> <p>24 A. So this is a complaint because he's not saying that the</p> <p>25 officers pose a continued threat.</p> <p style="text-align: center;">Page 66</p>	<p>1 another IRC following an altercation between him and</p> <p>2 detention officers.</p> <p>3 Looking specifically at the allegation that he'd</p> <p>4 been hit on the left-hand side of his head by a staff</p> <p>5 member, do you know if that specific allegation was ever</p> <p>6 reported by GDWG to G4S?</p> <p>7 A. It was. In fact, I was looking at this before this --</p> <p>8 before today, and if you notice, further down in the</p> <p>9 report it said, "Sent another email to the Safer</p> <p>10 Community Team", and when I -- that's called the Safer</p> <p>11 Community or the Safer Custody Team, that's the</p> <p>12 reporting email for safeguarding. When I looked back on</p> <p>13 the record, in our haste to summarise this, we had</p> <p>14 missed that we made an earlier -- there was an earlier</p> <p>15 email to the Safer Community Team after the first phone</p> <p>16 call, which is why it says "another email" further down.</p> <p>17 Q. So you think --</p> <p>18 A. We reported that.</p> <p>19 Q. The being hit on the left-hand side of his head? And do</p> <p>20 you know if that was ever investigated?</p> <p>21 A. I don't know that, no.</p> <p>22 Q. Are you aware of whether the name of a staff member was</p> <p>23 given? I know you have said that often they weren't,</p> <p>24 but do you know whether it was in this case?</p> <p>25 A. I very much doubt it, because the man found</p> <p style="text-align: center;">Page 68</p>

<p>1 communication extremely difficult. Just to make two 2 points, if I may. The first is, this is an example of 3 someone who should never have been detained. By the 4 Home Office's own principles, this was someone who was 5 clearly unwell. It didn't take anyone with any 6 knowledge of mental health to see that this was someone 7 presenting in such a way that he lacked capacity. So 8 the fact that he was detained at all was just 9 incomprehensible.</p> <p>10 The second thing just to mention, and this relates 11 to quite a few of these case studies -- you will see 12 some of these other case studies -- not case studies, 13 snippets of case studies, it says something was 14 disclosed to us and then it looks as if we took no 15 action. I looked back at all of these. In nearly every 16 case the person was -- you know, had a conversation with 17 us, we tried to follow up on it, the person was moved to 18 the Verne or -- you know, people were moved around the 19 detention estate. This is a great problem for people 20 becoming visible with their complaints. They are 21 constantly being moved from pillar to post. As soon as 22 they make a connection with someone, or someone starts 23 advocating for them, the whole thing, you know, happens 24 again. That's a really important thing to bear in mind 25 when you're looking at the ability of people in</p> <p style="text-align: right;">Page 69</p>	<p>1 to the Verne."</p> <p>2 I'm asked on behalf of G4S to ask why you describe 3 this as physical mistreatment, rather than just being 4 a use of force?</p> <p>5 A. Because that was how he described it to us.</p> <p>6 Q. While we are on this case, you talk about it a little 7 bit in your statement elsewhere, but you say that he 8 told you -- when I say "you", I, of course, again mean 9 your organisation -- about an incident of use of force 10 at Brook House, but it was only after he'd moved to the 11 Verne, I understand. For the record, those case records 12 are at <GDW000006>, pages 17 to 22. But we don't need 13 to bring them up on screen.</p> <p>14 Ms Pincus, you say that because he was at the Verne 15 at the time that he raised this allegation with you, 16 that the organisation's approach was to refer him to the 17 visitors group at the Verne; is that right?</p> <p>18 A. Yes, that's generally the way it works. All the 19 visitors groups collaborate very well with each other. 20 We don't tread on each other's toes.</p> <p>21 Q. Given that the incident that he was disclosing referred 22 to mistreatment at Brook House, did you consider that it 23 might have been a matter for GDWG to take forward, 24 rather than the Verne visitors group?</p> <p>25 A. So we made sure that the Verne visitors group were</p> <p style="text-align: right;">Page 71</p>
<p>1 a detention estate to make complaints.</p> <p>2 Q. Presumably, people are moved between detention centres 3 run by different companies as well, so we know that some 4 were run by G4S, some were run by other companies as 5 well; is that right?</p> <p>6 A. Yes.</p> <p>7 Q. But, given that the Home Office has a responsibility for 8 all of these detention centres, did you consider raising 9 a complaint to the Home Office about this allegation?</p> <p>10 A. Which allegation?</p> <p>11 Q. The specific one about being hit on the left-hand side 12 of his head?</p> <p>13 A. Well, I didn't, because I wasn't the safeguarding lead.</p> <p>14 Q. Okay.</p> <p>15 A. I don't know whether James considered it.</p> <p>16 Q. It may be useful in relation to some of these, if you 17 have further email evidence, that they can be disclosed 18 in due course, so that we can consider them.</p> <p>19 A. Yes.</p> <p>20 Q. Going to the next example, which is number 5, this 21 relates to D687, who is also known as "BB". It says: 22 "[He] telephoned GDWG ... from the Verne ... He 23 reported feeling sad and down. He said he tried to hang 24 himself at Brook House. He said 6 or 7 officers had 25 jumped on him and he was handcuffed. He had been taken</p> <p style="text-align: right;">Page 70</p>	<p>1 supporting him in relation to his emotional needs in 2 processing that -- what he had experienced as a trauma, 3 and we made sure that they had -- they told us, 4 actually, that they had referred him to a public law 5 solicitor to take up the issue.</p> <p>6 Q. Do you know whether any safeguarding referral was made 7 by yourselves to G4S in this case, or would it not have 8 been, because he was at the Verne at time?</p> <p>9 A. It wouldn't have been, because he was at the Verne at 10 the time.</p> <p>11 Q. If we can go to example 6, please?</p> <p>12 THE CHAIR: Mr Livingston, sorry, just while you pause, 13 I wonder if I can just ask a quick point of 14 clarification, just while we are on the subject.</p> <p>15 Ms Pincus, when you refer to "Safer Community Team", 16 is that what might sometimes be termed the Safer Custody 17 Team? Is that a team within G4S?</p> <p>18 A. Yes.</p> <p>19 THE CHAIR: Just so that we are not confused, that's not any 20 safeguarding mechanism in the community, such as the 21 Adult Safeguarding Board?</p> <p>22 A. No.</p> <p>23 THE CHAIR: So it is within G4S. Thank you.</p> <p>24 MR LIVINGSTON: While we are talking about that, was there 25 a specific contact that you had there? I think we have</p> <p style="text-align: right;">Page 72</p>

<p>1 heard evidence that James Begg was one of the DCMs in</p> <p>2 the Safer Community Team. Do you know if that was who</p> <p>3 you would contact or can you not remember.</p> <p>4 A. Because I wasn't the safeguarding lead, I wasn't making</p> <p>5 those contacts.</p> <p>6 Q. Okay.</p> <p>7 A. When I was looking through historic emails for the</p> <p>8 purpose of building this evidence for the inquiry, I saw</p> <p>9 James Begg's name.</p> <p>10 Q. Okay.</p> <p>11 A. I think that would be a question for James.</p> <p>12 Q. Okay. Thank you, chair.</p> <p>13 Yes, example 6. This is one of the ones in relation</p> <p>14 to mistreatment by escort staff, and you say in this</p> <p>15 example that the detained person called GDWG two days</p> <p>16 after an attempt to transfer him and complained that</p> <p>17 escorts had hurt his wrist after handcuffing him while</p> <p>18 he was being transferred. It was noted he was in great</p> <p>19 pain to his wrist and he was taken to hospital. The</p> <p>20 wrist wasn't broken but it was swollen. He had photos</p> <p>21 of the injuries and it says that G4S officers in</p> <p>22 Brook House recommended that he should report the</p> <p>23 incident, and it notes that he'd been held in</p> <p>24 segregation since the incident.</p> <p>25 Just a couple of questions about this. First of</p> <p style="text-align: center;">Page 73</p>	<p>1 initially told him that he just needed to speak to</p> <p>2 a manager about some documents, but then ended up being</p> <p>3 handed over to escorts for removal. He said he'd become</p> <p>4 very distressed, feeling he'd been tricked. He resisted</p> <p>5 removal, whereupon officers used force. He reported</p> <p>6 they assaulted him, causing him a head injury. He was</p> <p>7 taken to hospital on account of the head injury and he</p> <p>8 felt he was treated like an animal by Brook House</p> <p>9 officers.</p> <p>10 Do you know, in relation to this case, whether you</p> <p>11 reported it to anyone?</p> <p>12 A. I'm sorry, I don't know what action we took as a result</p> <p>13 of that.</p> <p>14 Q. As a general rule, would you expect that, in all of</p> <p>15 these cases, the person who has spoken to this person on</p> <p>16 the phone or met with this person to receive this</p> <p>17 information, would you expect that someone from GDWG</p> <p>18 would at least ask them if they wanted to make</p> <p>19 a complaint about it?</p> <p>20 A. Yes.</p> <p>21 Q. If we can look at example 8, please. This is described</p> <p>22 as physical mistreatment by escort staff occurring</p> <p>23 within Brook House during the relevant period. It says</p> <p>24 that GDWG met with someone who said that officers were</p> <p>25 very rough with him when he was taken to the airport.</p> <p style="text-align: center;">Page 75</p>
<p>1 all, do you know whether this was reported by your</p> <p>2 organisation to anyone, at the time?</p> <p>3 A. No, it's not clear from that whether he reported it or</p> <p>4 whether we did.</p> <p>5 Q. It obviously says here that G4S officers in Brook House</p> <p>6 recommended that he should report the incident.</p> <p>7 A. Mmm.</p> <p>8 Q. To your understanding, is that because the escorts are</p> <p>9 obviously employed -- I say "obviously". The escorts</p> <p>10 were employed by a different company, which, at that</p> <p>11 time, was called Tascor?</p> <p>12 A. Yes.</p> <p>13 Q. To your understanding, from what you understand, had G4S</p> <p>14 officers suggested that he make a complaint about the</p> <p>15 Tascor officers?</p> <p>16 A. That's my understanding, yes.</p> <p>17 Q. Was any referral made in relation to this case that you</p> <p>18 know of?</p> <p>19 A. I'm sorry, I don't remember the detail of the case.</p> <p>20 Q. The next example, please, example 7. This says that</p> <p>21 GDWG received a call from the detained person during the</p> <p>22 relevant period, who said he'd been -- I'm summarising</p> <p>23 this -- subject to a use of force during an attempt to</p> <p>24 transfer him. Going over to the next page, in summary,</p> <p>25 he says that he'd been tricked by officers, who had</p> <p style="text-align: center;">Page 74</p>	<p>1 Do you know if any report or referral was made in this</p> <p>2 case?</p> <p>3 A. I think applying a rule of proportionality to</p> <p>4 safeguarding, I don't think this would be an example of</p> <p>5 a case, because it would be almost inevitable that, when</p> <p>6 someone is being moved against their will, they would</p> <p>7 experience treatment as very rough.</p> <p>8 Q. Okay. We don't need to go to them individually, because</p> <p>9 they refer to outside the relevant period, but you do</p> <p>10 give some examples in this table where people have told</p> <p>11 you -- people who were detained during the relevant</p> <p>12 period have told you, your organisation, that they</p> <p>13 suffered mistreatment outside of the relevant period?</p> <p>14 A. Mmm-hmm.</p> <p>15 Q. Do you know, in those cases, whether there would be any</p> <p>16 referrals made?</p> <p>17 A. Do you mean when we were interviewing people in 2020 and</p> <p>18 they told us about things that happened historically?</p> <p>19 Q. Yes, I framed that wrongly, yes, but you've correctly</p> <p>20 interpreted what I wanted to ask. So in 2020, you have</p> <p>21 set out some of the things -- because I think, in 2020,</p> <p>22 you called some of the people that you'd been in touch</p> <p>23 with a few years previously --</p> <p>24 A. Mmm.</p> <p>25 Q. -- in order to provide evidence to this inquiry. Some</p> <p style="text-align: center;">Page 76</p>

1 of them told you about things that had happened during
 2 the relevant period, in 2017. What action would you
 3 have taken if someone -- or did you take when people
 4 told you about that?

5 **A. Well, we gave them emotional support throughout those**
 6 **conversations, but those people are all safe now. They**
 7 **have moved on in their own minds. I believe people**
 8 **interviewing them -- I can't honestly be certain if they**
 9 **asked them if they wanted to make an historic complaint.**
 10 **That wasn't the purpose of the phone call.**

11 Q. To your knowledge, and you may not be able to help with
 12 this, was there any sort of limitation on how long ago
 13 you could make a complaint about, so if a detained
 14 person called one of your staff members tomorrow and
 15 said, "I'd like to make a complaint about something that
 16 happened to me in 2015 or 2017", to your knowledge, is
 17 there any limit on how far back those complaints can be
 18 made about?

19 **A. Do you mean as a policy of the charity?**

20 Q. As a policy of the charity or, to your knowledge, any
 21 policy of the Home Office or G4S or anything like that?
 22 Would you still write to the Home Office potentially, if
 23 someone asked you to, about something that happened to
 24 them in 2015?

25 **A. If someone requested that we did it, yes, of course we**

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1 **would.**

2 Q. On reflection, I know that you have been able to look at
 3 some of the emails behind some of these things and that,
 4 on other occasions, you just don't know because you
 5 weren't the safeguarding lead, but, having looked at the
 6 examples you've given, do you consider, on reflection,
 7 that you should have, as an organisation, made more
 8 referrals to G4S or the Home Office or any other
 9 oversight body?

10 **A. I think you have to understand that there were very,**
 11 **very many people complaining about very, very many**
 12 **things. We could have overwhelmed G4S and the**
 13 **Home Office with emails pointing out things that we**
 14 **thought weren't good practice. It would have used up**
 15 **a lot of our staff time and resources. It would have**
 16 **made them even more angry with us than they already were**
 17 **when we asked once if someone could be moved to another**
 18 **centre.**

19 **James didn't have a positive relationship with them**
 20 **where it was easy for us to send every single item. We**
 21 **have a much better relationship now. Every time**
 22 **something is raised, I literally scatter-gun it, we**
 23 **write to the IMB, we write to welfare, we write to safer**
 24 **custody, I write to Steve Hewer --**

25 Q. Is that someone who works for Serco?

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1 **A. He's the head of the centre.**

2 Q. Okay.

3 **A. He hasn't told me not to write to him. So it's**
 4 **a different -- we have a different relationship with**
 5 **Serco now. But, at that time, there was definitely**
 6 **a culture of silencing. It was extremely effective upon**
 7 **GDWG.**

8 Q. I want to ask you a bit about verbal mistreatment, which
 9 is another thing that you talk about in your statement,
 10 and also in these examples.

11 Now, I understand, like with physical mistreatment,
 12 because you weren't in the wings, you wouldn't have
 13 witnessed this verbal mistreatment yourself.

14 **A. Yes.**

15 Q. It would be things that you were told about; is that
 16 right?

17 **A. Yes.**

18 Q. You give examples of some detained people that did
 19 report verbal abuse from staff. We can see here that
 20 there are examples over the page about detention
 21 officers telling detained people to go back to their own
 22 country, for example; is that right?

23 **A. Yes.**

24 Q. And you, or your organisation, received complaints that
 25 staff had told detained people that?

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1 **A. Yes.**

2 Q. You also give examples, at paragraph 64 of your
 3 statement, that you had been told, as an organisation,
 4 that staff called detained people racist names, such as
 5 "Monkey" and "Blacky"; is that right?

6 **A. It is.**

7 Q. Do you know if those examples were during the relevant
 8 period?

9 **A. Yes, they were.**

10 Q. Were you told which staff members had used this sort of
 11 language?

12 **A. As I said, people weren't aware of the names of staff --**
 13 **weren't always aware.**

14 Q. Where they were aware -- I appreciate you've said that
 15 often they wouldn't know. But if they did report
 16 a name, would that make you more likely to report it?

17 **A. It's very difficult for us to report it when it's the**
 18 **word of a detained person against an officer, where it's**
 19 **an unsubstantiated complaint. And you've seen how**
 20 **normalised -- you've seen from the footage how**
 21 **normalised racist language or unkind language was at**
 22 **that time. So many people expected that and didn't even**
 23 **probably tell us about it. People would say things in**
 24 **generalised terms to us, like, you know, "The officers**
 25 **are bad here, Miss", and I'd say, "Oh, do you want to**

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20 (Pages 77 to 80)

<p>1 tell me" -- "No, no, I don't want you to know, Miss. 2 It's too bad to know, Miss", or, "They treat us like 3 animals, Miss". So people would tell us in general 4 terms, would express their dehumanisation in general 5 terms, and I think that's what the language was doing. 6 It was dehumanising detained people. 7 Q. I understand that -- where it's told in general terms, 8 I can see how it would be very difficult to make 9 a complaint about that, because it would be almost 10 impossible to investigate, presumably. 11 A. Mmm-hmm. 12 Q. But just coming back to the specifics -- I know these 13 are only examples -- of the allegation that staff had 14 called detained people "Monkey" and "Blacky", did you 15 consider reporting that allegation, or those 16 allegations, to G4S? 17 A. Those allegations came to light when we were doing our 18 interviews in 2020. 19 Q. Okay. 20 A. And the detained person has moved on now and he didn't 21 wish us to make an historic complaint. But, in any 22 case, for someone to make a complaint, they have to 23 believe that there's a reasonable chance that it will be 24 upheld. Otherwise, it makes them lose even more faith 25 in the system and it makes them feel even more that they</p> <p style="text-align: right;">Page 81</p>	<p>1 the way staff reacted to detained persons that they were 2 not treating them with the level of respect that I would 3 have wished or expected. 4 Q. You say overall -- I'm looking at verbal mistreatment, 5 and you say this -- at paragraph 66 for the 6 transcriber -- that your impression was that "many 7 detention officers viewed detained people in a negative 8 way and behaved towards them in a manner which 9 ultimately dehumanised them or contributed to a 10 dehumanisation". You have already talked a bit about 11 dehumanisation, but why did you come to that view? Was 12 that based on what you had been told by people directly 13 and by your colleagues? 14 A. I guess it's two things, really. So the first is that 15 we were witnessing the impact of that treatment. So we 16 were seeing how people were cowed, how they would kind 17 of be sweating with fear. We saw how people, you know, 18 lost weight and how people were generally made unwell by 19 being in the centre and how they would describe their 20 treatment. So there's what they said, how they looked, 21 and then there were also the things that I personally 22 witnessed, most of which are very, very tiny, especially 23 in the context of what we saw in the footage for the 24 inquiry, but things where, even when people were 25 behaving well to me, people would give themselves away</p> <p style="text-align: right;">Page 83</p>
<p>1 aren't heard. I think, in 2019, there were 2 95 complaints and one was upheld. So in order to make 3 a complaint, I don't think it would be responsible for 4 it to be for the use of a racist word where it's one 5 person's word against another's and there's no proof. 6 I think it would be unsubstantiated. 7 Q. So you, yourself, or your organisation, wouldn't have 8 had confidence that that would have been investigated 9 properly or would have reached an outcome that would be 10 satisfactory to the detained person; is that fair? 11 A. If someone said, "Someone called me a name", in the 12 context of a detention centre, where that was part of 13 the culture and where the centre were not encouraging us 14 to share our observations about the way people were 15 treated, or any observations, I don't think we would 16 have registered that as a complaint. 17 Q. I know that you received this -- you were told this in 18 2020, it's obviously three years after Panorama and the 19 relevant period, so obviously, by that time, you'd 20 watched Panorama, presumably, and seen some of 21 the language being used. If you can try and transplant 22 yourself back to the relevant period before Panorama, if 23 you had been told that type of language had been used, 24 would you have been surprised? 25 A. I wouldn't have been surprised, because I could see from</p> <p style="text-align: right;">Page 82</p>	<p>1 by their actions. You know, it might just be eye 2 rolling -- 3 Q. By "people", you mean staff, presumably? 4 A. Staff, yes, DCOs. Eye rolling when someone says 5 something to them; speaking very loudly and in an 6 exaggerated manner when someone doesn't understand 7 English, and then, if the person gives another response, 8 laughing or speaking the same words again even louder. 9 Little things, like somebody -- people go through 10 security to come to the visits corridor. Someone might 11 drop the contents of their pockets all over the floor. 12 The most instinctive thing to do is to, like, give them 13 a hand, but people would stand over them. I said it's 14 tone and bearing. It's really hard to put into words, 15 but if you see it with your eyes, you know exactly 16 what's going on. 17 Comparing it to what we saw on the footage, it's 18 small fry, it's nothing. We never could have imagined 19 it could be on that scale. But it all indicates -- 20 those little things are indicators of the wider culture 21 that led to the types of dehumanising that you saw when 22 the man was howling on the ground. 23 Q. Just to check on a small point of detail on that: you 24 say it was DCOs, but I think you said earlier that most 25 of your contact was with ACOs. Are you talking about</p> <p style="text-align: right;">Page 84</p>

<p>1 both or -- when you are talking about these sorts of</p> <p>2 acts, is it both or is it just DCOs?</p> <p>3 A. It's very interesting, isn't it, that it was ACOs and</p> <p>4 DCOs. So the DCOs we'd see on the visits corridor when</p> <p>5 we were doing our drop-ins, but the ACOs our visitors</p> <p>6 would come into contact with every day when they were</p> <p>7 coming to visit detained persons. I think Jamie</p> <p>8 mentioned it: the ACOs would treat them, GDWG visitors,</p> <p>9 mostly white, mostly middle-class, in one way; and then</p> <p>10 have a completely different tone and bearing to the</p> <p>11 families of detained persons, who actually needed a lot</p> <p>12 more understanding and compassion because they were</p> <p>13 frequently maybe visiting someone for the final time,</p> <p>14 certainly visiting someone who they knew was going to be</p> <p>15 anxious, may not have understood the procedure, may have</p> <p>16 had a long journey, some people travelled down from</p> <p>17 Yorkshire to visit someone in Brook House. So many</p> <p>18 reasons why those people needed a lot more understanding</p> <p>19 than our visitors, but the behaviours were the other way</p> <p>20 around.</p> <p>21 Q. One of the things that you said in your statement,</p> <p>22 I think, when talking about the sort of dehumanisation</p> <p>23 or the general treatment, is that people reported that</p> <p>24 room searches were carried out in a manner which left</p> <p>25 them feeling bullied by staff, with personal items</p> <p style="text-align: center;">Page 85</p>	<p>1 due to Covid has changed the atmosphere. But members of</p> <p>2 staff still say to detained people, "Well, you chose to</p> <p>3 come here. Go back to your own country". I think those</p> <p>4 types of utterances aren't rare.</p> <p>5 Q. One of the things that you refer to, also, when talking</p> <p>6 about this general type of mistreatment, is that you say</p> <p>7 that you witnessed staff mishandling situations where</p> <p>8 detained people were distressed, having not been granted</p> <p>9 bail. Would that be -- that would be DCOs or would that</p> <p>10 be ACOs? DCOs?</p> <p>11 A. Yes.</p> <p>12 Q. You say, at paragraph 67 of your statement, that you</p> <p>13 chose not to intervene in that situation, in the example</p> <p>14 you can remember, because it might have put your drop-in</p> <p>15 sessions at risk?</p> <p>16 A. Yes.</p> <p>17 Q. Although you chose not to intervene at the time, did you</p> <p>18 consider reporting it afterwards, or is this another</p> <p>19 situation that the threshold isn't crossed?</p> <p>20 A. This was definitely not of a threshold where it would</p> <p>21 have been something to report. It just showed how</p> <p>22 ill-equipped staff were to respond to vulnerable people</p> <p>23 at a time of crisis. So the event that I referred to</p> <p>24 there was a man who had just come out of a bail hearing,</p> <p>25 having been refused bail, and he'd kind of sunk to his</p> <p style="text-align: center;">Page 87</p>
<p>1 strewn around the cell. I have already asked you this</p> <p>2 in another context, but were you told which staff</p> <p>3 members had done this type of thing?</p> <p>4 A. No, we weren't.</p> <p>5 Q. Do you know whether this type of conduct of sort of</p> <p>6 bullying-style searches, do you know whether that was</p> <p>7 said to have happened during the relevant period?</p> <p>8 A. Yes, I'm sure it was.</p> <p>9 Q. Would you have reported that type of thing?</p> <p>10 A. No, we wouldn't.</p> <p>11 Q. Why not?</p> <p>12 A. I think it just wouldn't cross the threshold of</p> <p>13 something we would feel able to report to G4S. We might</p> <p>14 now, but at that time, there was effective silencing,</p> <p>15 I think, of GDWG. James could answer that better than</p> <p>16 me.</p> <p>17 Q. I just want to check, actually -- you talked about the</p> <p>18 dehumanising and some of the small-scale culture that</p> <p>19 existed. In your experience -- and I know things have</p> <p>20 been strange because of Covid and, therefore, visits are</p> <p>21 different and there's different people -- is the</p> <p>22 situation different now?</p> <p>23 A. I really hope it's not on the scale that it was.</p> <p>24 I think the fact there's less spice in the centre, the</p> <p>25 fact that numbers have been much reduced in the centre</p> <p style="text-align: center;">Page 86</p>	<p>1 knees in the corridor and was shouting that he didn't</p> <p>2 want to go -- raising his voice, saying he didn't want</p> <p>3 to go back, meaning go back into the main body of</p> <p>4 the centre.</p> <p>5 It was a bit of a commotion, which was why I went to</p> <p>6 the doorway of the room, and once I looked out, I could</p> <p>7 see the man and he was tearful and it was almost as if</p> <p>8 he couldn't see the people around him, he was kind of in</p> <p>9 his own world of misery, and I had a kind of -- like,</p> <p>10 I have a professional caring in my job, which I don't</p> <p>11 cross, but, occasionally, you have a visceral sense of</p> <p>12 emotion and, in this case, my visceral sense of emotion</p> <p>13 was that -- my instinct was to just -- would have been</p> <p>14 to have knelt down next to the man and looked him in the</p> <p>15 face and encouraged him. You know, "You can do this".</p> <p>16 But what the officers did was to raise their own voices</p> <p>17 louder than his, so that they were escalating</p> <p>18 a situation which was a man who wasn't trying to be</p> <p>19 non-compliant, he was just expressing in the moment his</p> <p>20 extreme distress, and he could have had a chance to</p> <p>21 bring himself out of that with some encouragement.</p> <p>22 Now, obviously, the officers aren't social workers,</p> <p>23 they're not necessarily trained in therapeutic support;</p> <p>24 neither am I, but, as a human being, there was</p> <p>25 a different response from the one that they gave, and</p> <p style="text-align: center;">Page 88</p>

<p>1 the one that they gave ended up in the kind of scuffle</p> <p>2 of dragging him to his feet and him getting more upset</p> <p>3 and, to be honest, him losing a bit of dignity, which he</p> <p>4 could have maintained if someone had talked to him.</p> <p>5 I remember it because I was having to restrict my</p> <p>6 instinct, my visceral response, and that was</p> <p>7 uncomfortable --</p> <p>8 Q. Just so that we are clear about that, Ms Pincus, because</p> <p>9 you said, you know, that your instinct was to</p> <p>10 potentially kneel down next to him and help him.</p> <p>11 A. Yes.</p> <p>12 Q. Why did you choose not to do that on that occasion?</p> <p>13 A. Well, there were signs in the room that said that people</p> <p>14 using the rooms as interview rooms are not allowed to</p> <p>15 leave the room unless taken by an officer. So that's</p> <p>16 like a rule. Occasionally, if I had been in a drop-in</p> <p>17 room and someone had not come to see me, I might have</p> <p>18 suspected that they were waiting in the waiting room and</p> <p>19 that the staff hadn't had time or had forgotten to bring</p> <p>20 the person to me, and I'd leave the room to just say,</p> <p>21 "Hi, I'm still here waiting. Is there someone for me?",</p> <p>22 and I'd get reprimanded for doing that.</p> <p>23 Plus, at the time, we were concerned that anything</p> <p>24 we did that angered G4S might threaten our drop-in.</p> <p>25 Q. So that was all going through your head?</p> <p style="text-align: center;">Page 89</p>	<p>1 as an organisation, awareness of what was reported on</p> <p>2 Panorama. Broadly, to summarise, and you can tell me if</p> <p>3 this is wrong, I think your evidence is that you, as an</p> <p>4 organisation, knew that some detained people had</p> <p>5 complaints about treatment and weren't treated well?</p> <p>6 A. Mmm-hmm.</p> <p>7 Q. But that you only realised the gravity of the situation</p> <p>8 upon watching Panorama; is that right?</p> <p>9 A. It is.</p> <p>10 Q. I know you've set out some reasons for this at</p> <p>11 paragraph 76 onwards of your statement, but if you can</p> <p>12 sort of summarise for us why do you think that you, as</p> <p>13 an organisation, didn't realise the gravity of</p> <p>14 the situation at the time?</p> <p>15 A. Well, I think the most -- it sounds an obvious reason,</p> <p>16 but it is the most -- it is the main factor, is that we</p> <p>17 simply weren't permitted beyond that door in the visits</p> <p>18 corridor, so we never saw how people were treated on the</p> <p>19 wings.</p> <p>20 Q. That obviously applies to seeing things yourselves, but</p> <p>21 I suppose there's obviously the other issue of why you</p> <p>22 think you didn't realise the gravity of the situation</p> <p>23 from all of the people that you were seeing, both the</p> <p>24 staff and the visitors, of what was going on at the</p> <p>25 time?</p> <p style="text-align: center;">Page 91</p>
<p>1 A. That was all going through my mind: I've got to conform,</p> <p>2 I've got to do what G4S wishes of me. And I repressed</p> <p>3 that instinct to just take my head down to the same</p> <p>4 level as the man and encourage him. It was very</p> <p>5 uncomfortable. In retrospect, I probably wished I had.</p> <p>6 Q. Looking back, we have talked a bit about the approach</p> <p>7 that GDWG took in terms of raising complaints and when</p> <p>8 you felt that you could, and you talked about the</p> <p>9 culture of silencing. Did you, at the time, agree with</p> <p>10 the approach that James Wilson, the director of GDWG at</p> <p>11 the time, was taking to when you should report</p> <p>12 complaints and things like that?</p> <p>13 A. I did, because we're a welfare group. We exist for the</p> <p>14 welfare -- to support people. If our drop-in had been</p> <p>15 taken away from us, that would have become much more</p> <p>16 difficult. We would have been able to help only a small</p> <p>17 proportion of the people that we were able to help with</p> <p>18 the drop-in. People who were extremely vulnerable, who</p> <p>19 found it hard to communicate on the phone or who had</p> <p>20 very poor English, found it hard to communicate on the</p> <p>21 phone, we wouldn't have been able to help to the same</p> <p>22 extent.</p> <p>23 So it was crucial that we did everything we could to</p> <p>24 maintain our drop-ins.</p> <p>25 Q. I want to come on to a new topic, which is about your,</p> <p style="text-align: center;">Page 90</p>	<p>1 A. I think it's important to realise that detained people</p> <p>2 are experiencing many levels of harm, so the</p> <p>3 architecture of the centre itself is experienced as</p> <p>4 a harm. It's a very brutal place to be.</p> <p>5 The fact that people are detained indefinitely</p> <p>6 causes harm and mental health distress. So, for people</p> <p>7 in detention, they would express their feelings about</p> <p>8 the situation, but it would be about many of</p> <p>9 the different harms -- the fact that they were detained</p> <p>10 at all; the fact that they had no idea what was</p> <p>11 happening with their case; their sense of bewilderment;</p> <p>12 the fact that there was no privacy.</p> <p>13 Q. So --</p> <p>14 A. So this was another kind of manifestation of an</p> <p>15 injustice that they felt, but it was one of many, and</p> <p>16 they were bringing them all to us.</p> <p>17 Q. Sometimes these type of complaints might have got lost</p> <p>18 or just immersed within complaints about access to</p> <p>19 healthcare, complaints about the conditions, complaints</p> <p>20 about the food all sort of coming together; is that</p> <p>21 right?</p> <p>22 A. Mmm-hmm.</p> <p>23 Q. To the extent that you have been able to do this, when</p> <p>24 reflecting on this period, do you think that there's</p> <p>25 anything, as an organisation, that you could have done</p> <p style="text-align: center;">Page 92</p>

1 in order to better -- to have a better understanding of
 2 what was going on at the time?
 3 **A. With the amount of access that we had, I don't think**
 4 **there is. We knew what was happening on one level. You**
 5 **know, we knew that people said they were treated like**
 6 **animals, we knew whispers of occasional events of**
 7 **mistreatment. We had no idea of the scale. Like, the**
 8 **things that we saw on the footage, just beyond the scale**
 9 **of, you know, what is shocking or what is acceptable.**
 10 **We never could have imagined it.**
 11 Q. I know you've said, and I've asked you about this a few
 12 times, about the names of staff members responsible for
 13 this stuff, and you said that often they wouldn't know,
 14 so you wouldn't get told. Were there any names that
 15 were -- that came up in Panorama or that have come up
 16 since that has occurred to you, "Oh, yeah, we heard
 17 quite a lot of things about that person"?
 18 **A. No, people would never name a person.**
 19 Q. One of the things you say at paragraph 73 of your
 20 statement, Ms Pincus, is that one of the detained people
 21 who appeared in Panorama reported to GDWG something of
 22 the incident he was involved in, but you don't have his
 23 authority to provide the details. So without going into
 24 those details, are you able to tell us what steps GDWG
 25 did take in response to that?

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1 **A. I'm sorry, without my -- without the notes of that --**
 2 **I can report that to the inquiry afterwards --**
 3 Q. That would be helpful.
 4 **A. -- having checked our database.**
 5 Q. That would be helpful, thank you. One of the things
 6 that you have said in your statement that you think
 7 might improve your ability to identify mistreatment, as
 8 an organisation, is, I think, by holding your drop-in
 9 sessions in the library, so in the main bit of
 10 the centre. Is that right?
 11 **A. Yes.**
 12 Q. Why is that, if it doesn't seem too obvious?
 13 **A. I just think we would be able to see for ourselves how**
 14 **people are moving around, how they're interacting with**
 15 **staff, and we'd be able to meet with a greater range of**
 16 **people, not just people who are, as I said before, well**
 17 **enough to self-refer through a telephone call.**
 18 Q. Has the idea of you holding drop-ins in the library, to
 19 your knowledge, ever been raised, either with G4S at the
 20 time or with Serco more recently?
 21 **A. I have mentioned it to Serco since they took over the**
 22 **contract.**
 23 Q. Where have you got with that?
 24 **A. I think they're considering it.**
 25 Q. Are there any reasons given for not doing it? Is it

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1 about security or do you not know the reasons?
 2 **A. I don't think there were any reasons. There were no**
 3 **negative -- it wasn't a negative response.**
 4 MR LIVINGSTON: Chair, I have about another half an hour to
 5 45 minutes for this witness. I wonder, just to avoid us
 6 sort of having just a short period after, whether it's
 7 a good idea to break for lunch now a bit early and then
 8 come back at, say, 1.45, if that's possible?
 9 THE CHAIR: That sounds like a good idea. Thank you very
 10 much, Ms Pincus. We will return at 1.45 pm.
 11 (12.43 pm)
 12 (The short adjournment)
 13 (1.49 pm)
 14 MR LIVINGSTON: Good afternoon, chair. Good afternoon,
 15 Ms Pincus.
 16 I am now going to ask you some questions about
 17 healthcare at Brook House. You have provided to the
 18 inquiry a report which was compiled by Gatwick Detainee
 19 Welfare Group back in 2017, <VER000106>, if we could
 20 bring that up on screen. As we can see, that was
 21 provided as part of evidence for the Stephen Shaw
 22 Inquiry in 2017, dated November 2017. Is that right,
 23 Ms Pincus?
 24 **A. Yes, it is.**
 25 Q. I would ask for that to be adduced in full, please,

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1 chair, but, Ms Pincus, I'm not going to ask you in too
 2 much detail about this because we have the report and it
 3 provides the detail and you have provided some more
 4 detail in your statement as well. But just to ask you
 5 about a few of the themes. It is right that this report
 6 focused on detained people at Brook House between
 7 15 March and 31 October 2017; yes?
 8 **A. That's correct.**
 9 Q. One of the things that the report talks about and that
 10 you talk about in your statement is about the scale of
 11 vulnerabilities within the detained population at
 12 Brook House.
 13 **A. Yes.**
 14 Q. You note that, of the 220 people seen by GDWG during
 15 that period, 105 were identified as vulnerable by your
 16 organisation. First of all, that's right, in terms of
 17 the numbers; yes?
 18 **A. Yes.**
 19 Q. The definition, I suppose, of "vulnerability" that you
 20 have used for this is someone who had a diagnosed mental
 21 illness, a serious physical health condition or had
 22 expressed a wish of self-harm; is that right?
 23 **A. That's correct.**
 24 Q. Did that sort of number -- so that's 105 of 220, about
 25 half -- accord with your own experience of the scale

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24 (Pages 93 to 96)

<p>1 of -- the amount of people in Brook House who had</p> <p>2 vulnerabilities like that?</p> <p>3 A. It did, yes.</p> <p>4 Q. Was that level, so, like, one in two people you see</p> <p>5 having that sort of vulnerability, was that pretty</p> <p>6 consistent across the years, or is that high or low or</p> <p>7 pretty consistent?</p> <p>8 A. I would say it's consistent in the years since we have</p> <p>9 been working in Brook House.</p> <p>10 Q. The report also notes that you found, from your own</p> <p>11 records, that 17 per cent of people that you saw had</p> <p>12 feelings of self-harm, which you note is likely to</p> <p>13 represent a significant underestimate. Is that right?</p> <p>14 A. That's correct.</p> <p>15 Q. I'm asked to ask you on behalf of G4S, on each occasion</p> <p>16 when a detainee or a detained person reported feelings</p> <p>17 of self-harm, would that trigger a safeguarding</p> <p>18 referral?</p> <p>19 A. I think it would depend upon the degree to which it was</p> <p>20 expressed to us.</p> <p>21 Q. Okay. So, again, is that just going back to whether you</p> <p>22 thought they were at risk of significant harm based on</p> <p>23 what they told you?</p> <p>24 A. Yes.</p> <p>25 Q. You also, in your report, identified significant flaws</p> <p style="text-align: center;">Page 97</p>	<p>1 Q. One is about confusion among medical staff about the</p> <p>2 role of rule 35?</p> <p>3 A. (Witness nods).</p> <p>4 Q. One is about evidence of increasing vulnerability rarely</p> <p>5 being communicated by healthcare to the Home Office, and</p> <p>6 then there's also about practical difficulties</p> <p>7 restricting detained people from accessing medical</p> <p>8 practitioners. If I can just ask you briefly about each</p> <p>9 of those.</p> <p>10 In terms of evidence of vulnerability not being</p> <p>11 shared using the rule 35 system, presumably, that links</p> <p>12 with the next one, which is about confusion about what</p> <p>13 rule 35 was?</p> <p>14 A. Yes. I think we have heard in previous evidence there</p> <p>15 are three categories of rule 35: one is if detention is</p> <p>16 injurious to health; one is if someone is suicidal; and</p> <p>17 one is if someone is a victim of torture. I believe</p> <p>18 that there were only rule 35s relating to the third</p> <p>19 category, to the torture category. This continues to</p> <p>20 this day.</p> <p>21 Q. From your experience, is the sort of failure to raise or</p> <p>22 to share information using the rule 35 system about the</p> <p>23 other two bits of the detention, being injurious to</p> <p>24 health or feelings of suicide, is that due to lack of</p> <p>25 knowledge, is that due to any instruction from the</p> <p style="text-align: center;">Page 99</p>
<p>1 in the role of the healthcare department at Brook House</p> <p>2 in identifying vulnerable people and in reporting</p> <p>3 clinical concerns to the Home Office?</p> <p>4 A. Yes.</p> <p>5 Q. For the record, that's dealt with from paragraph 97 of</p> <p>6 the statement onwards. You explain, Ms Pincus, that</p> <p>7 these failures related to failures to carry out</p> <p>8 effective screening, so that's right at the beginning of</p> <p>9 the detention -- yes?</p> <p>10 A. It's probably even before then. It's -- oh, yes, sorry,</p> <p>11 in relation to informing the Home Office?</p> <p>12 Q. Yes.</p> <p>13 A. Yes.</p> <p>14 Q. And failures to correct omissions or mistakes in those</p> <p>15 initial screenings as well?</p> <p>16 A. Omissions, yes. So when further information came</p> <p>17 available, when, for example, health records arrived at</p> <p>18 the centre after the initial screening, there was no</p> <p>19 evidence that the Home Office had been updated.</p> <p>20 Q. Then, as you say, failure to share information with the</p> <p>21 Home Office. You summarise in your statement four key</p> <p>22 areas of concern about that failure of information</p> <p>23 sharing. One is about evidence of vulnerability not</p> <p>24 being shared using the rule 35 system?</p> <p>25 A. (Witness nods).</p> <p style="text-align: center;">Page 98</p>	<p>1 Home Office? Can you help us with why that happens?</p> <p>2 A. I would not know whether it was poor training, but --</p> <p>3 I don't know if you want me to --</p> <p>4 Q. Yes, yes, you can expand on it.</p> <p>5 A. -- speculate?</p> <p>6 Q. Only if you have any experience of knowing why it hadn't</p> <p>7 happened on any particular occasions.</p> <p>8 A. I don't have experience, but it's interesting that the</p> <p>9 category that has visual evidence is the only one that</p> <p>10 is reported.</p> <p>11 Q. That's the torture one, you're talking about?</p> <p>12 A. Yes. One wonders if people are reticent to make a claim</p> <p>13 based on the subjective perception of the other two,</p> <p>14 either due to not wanting to bring too many cases to the</p> <p>15 Home Office or due to their lack of training.</p> <p>16 Q. One of the things you also say is that there was</p> <p>17 a failure of information sharing in relation to evidence</p> <p>18 of increasing vulnerability. You talked a bit earlier</p> <p>19 in a different context about the dynamic risk and</p> <p>20 dynamic vulnerabilities. Is that the same issue, that</p> <p>21 people's risk changed over time and you didn't see that</p> <p>22 communicated?</p> <p>23 A. Absolutely. Yes.</p> <p>24 Q. Then the final thing, which is relating to practical</p> <p>25 difficulties restricting detained people from accessing</p> <p style="text-align: center;">Page 100</p>

25 (Pages 97 to 100)

<p>1 medical practitioners, in your experience, was that an</p> <p>2 issue of resources or was that an issue of language, or</p> <p>3 is it a mixture of lots of different things?</p> <p>4 A. It's really hard for me to be able to know the answer to</p> <p>5 that, but certainly, when people presented at healthcare</p> <p>6 and requested appointments, they weren't available.</p> <p>7 Q. One of the things that the inquiry has heard from</p> <p>8 a couple of sources is that, when detained people were</p> <p>9 interviewed by various different agencies, there was</p> <p>10 a general feeling that almost the majority of concerns</p> <p>11 expressed were about healthcare-related issues. Are you</p> <p>12 able to tell us, was that your experience within GDWG?</p> <p>13 A. It was definitely our experience, and I think it was</p> <p>14 also the experience of our visitors, as Jamie said</p> <p>15 yesterday.</p> <p>16 Q. I'd also ask, chair, although I'm not going to take</p> <p>17 Ms Pincus to it, for the analysis of information sharing</p> <p>18 with the Home Office at <VER000104> to be adduced in</p> <p>19 full as well.</p> <p>20 One of the things you do refer to specifically</p> <p>21 within your statement is that a lack of interpreters</p> <p>22 added to the difficulties of accessing healthcare. Do</p> <p>23 you have any insight -- I know you're not in there, but</p> <p>24 do you have any insight, from your experience, as to</p> <p>25 what impact this had on the disclosure of mental health</p> <p style="text-align: center;">Page 101</p>	<p>1 was it easier, harder?</p> <p>2 A. Well, there were phones in the room, and we could use</p> <p>3 those to dial up the interpreters that our organisation</p> <p>4 use, so at our cost, but we would use interpreters that</p> <p>5 way.</p> <p>6 Q. So you used your own interpreters. I think we have</p> <p>7 heard -- I could be getting the name wrong --</p> <p>8 LanguageLine was something that was used within</p> <p>9 Brook House?</p> <p>10 A. Yes.</p> <p>11 Q. Were you able to use --</p> <p>12 A. I think it's LanguageLine that we used.</p> <p>13 Q. To the best of your knowledge, you were having to use</p> <p>14 that at your own expense?</p> <p>15 A. Yes, we would call up and give them our --</p> <p>16 Q. Details.</p> <p>17 A. -- code.</p> <p>18 Q. If somebody spoke no English and you knew that in</p> <p>19 advance, could you request an interpreter from G4S or</p> <p>20 the Home Office?</p> <p>21 A. No.</p> <p>22 Q. We have already talked a little bit about the culture of</p> <p>23 disbelief in the context of staff, DCOs, DCMs,</p> <p>24 et cetera, and the Home Office, but you also in your</p> <p>25 statement describe a culture of disbelief within</p> <p style="text-align: center;">Page 103</p>
<p>1 issues?</p> <p>2 A. I think it had -- the disclosure meant it had huge</p> <p>3 impact on every interaction that people had with</p> <p>4 healthcare. I think people reported to us that staff</p> <p>5 even used Google Translate, which is not a professional</p> <p>6 way of interpreting, especially for something as</p> <p>7 sensitive as medical care.</p> <p>8 Q. Jamie MacPherson talked a bit yesterday about</p> <p>9 interpreters being an issue for visitors and they</p> <p>10 couldn't always get access, and he gave an example of,</p> <p>11 I think, a time where he had an hour with an Iranian</p> <p>12 detainee and they just had to use a dictionary to try to</p> <p>13 communicate a little bit.</p> <p>14 In terms of when you and other staff were seeing</p> <p>15 detained people in the visits hall, were language</p> <p>16 barriers a big issue?</p> <p>17 A. I think our visitors would say it's miraculous how far</p> <p>18 you can get with no common language, with a lot of</p> <p>19 goodwill and time and intention and miming and a piece</p> <p>20 of paper and a pen. So I think visitors did remarkably</p> <p>21 well. But it would be wonderful to have the facility of</p> <p>22 interpreters.</p> <p>23 Q. What about staff? So when you were going to see someone</p> <p>24 for a drop-in session or your colleagues were, was it</p> <p>25 a similar -- were you at a similar level of barriers or</p> <p style="text-align: center;">Page 102</p>	<p>1 healthcare staff at Brook House. Do you have any</p> <p>2 insight as to how that culture amongst healthcare staff</p> <p>3 came about?</p> <p>4 A. I have no idea how that came about. I mean, it's not</p> <p>5 the culture that you encounter in the community when you</p> <p>6 go and see your GP. So --</p> <p>7 Q. You think -- and so, is your evidence that, from what</p> <p>8 you were told, there was quite a stark difference in the</p> <p>9 extent to which healthcare staff at Brook House believed</p> <p>10 what they were being told, compared to --</p> <p>11 A. Exactly, yes.</p> <p>12 Q. -- anyone's experience outside?</p> <p>13 A. Mmm-hmm.</p> <p>14 Q. You say in your statement, at paragraph 123, that, in</p> <p>15 the main, detained people were distrustful of healthcare</p> <p>16 staff, and you give your view that they did not play an</p> <p>17 objective role because they aligned themselves with the</p> <p>18 Home Office and with Brook House management. In what</p> <p>19 way did healthcare align themselves with the Home Office</p> <p>20 and Brook House management?</p> <p>21 A. Well, I think they would express the view to detained</p> <p>22 people that they were feigning an illness in order to</p> <p>23 try and not be placed on a flight.</p> <p>24 Q. Were you told that healthcare staff would actually say</p> <p>25 that to someone, as opposed to writing it in the notes</p> <p style="text-align: center;">Page 104</p>

<p>1 or something?</p> <p>2 A. Yes.</p> <p>3 Q. Because of that, did detained people tell you that they</p> <p>4 didn't trust healthcare staff?</p> <p>5 A. Yes. I mean, it was also a question of feeling</p> <p>6 dismissed when they presented with illnesses. They</p> <p>7 would be always endlessly told to come back later. They</p> <p>8 just didn't feel listened to.</p> <p>9 Q. In your experience, again, trying to think back to 2017,</p> <p>10 did you perceive there to be a resource issue as well?</p> <p>11 Was it that there wasn't enough staff, healthcare staff,</p> <p>12 or do you not know?</p> <p>13 A. I didn't know. From what we've heard in the inquiry, it</p> <p>14 seems likely that was.</p> <p>15 Q. One of the things you also say in your statement -- this</p> <p>16 is at paragraph 130 -- is that the healthcare department</p> <p>17 at Brook House didn't encourage you to raise concerns</p> <p>18 and didn't reply when you did raise concerns. First of</p> <p>19 all, on the not encouraging, is that passively not</p> <p>20 encouraging or is that actively discouraging?</p> <p>21 A. Well, if we had -- if a detained person asked us to</p> <p>22 raise a matter with healthcare and signed a form to give</p> <p>23 us permission to do so and, when we called up healthcare</p> <p>24 and told them that we had the permission, they still</p> <p>25 refused to speak to us and said the detained person</p> <p style="text-align: center;">Page 105</p>	<p>1 us to raise a concern. We have a formal authority.</p> <p>2 Will you talk to us about the detained person?", and</p> <p>3 they'd say, "No, for reasons of confidentiality". So</p> <p>4 then we would say, "Okay, we are going to tell you some</p> <p>5 information. Please make sure that you record it and</p> <p>6 act accordingly", and then we'd pass on the information,</p> <p>7 even though we had no way of knowing how they were</p> <p>8 receiving it or what action they were taking.</p> <p>9 Q. We have talked a little bit about -- we have talked</p> <p>10 a while about complaints in the context of staff and</p> <p>11 physical mistreatment and verbal mistreatment. When it</p> <p>12 comes to complaints about healthcare, we have talked</p> <p>13 a little bit just there about you were complaining to</p> <p>14 healthcare about healthcare. In terms of sort of going</p> <p>15 higher than that, were you aware of, or were detained</p> <p>16 people aware of, the ability to complain to the NHS</p> <p>17 directly, to NHS England, or was that not something that</p> <p>18 you were aware of?</p> <p>19 A. That's something we weren't aware of. But we did,</p> <p>20 I think -- at that time, James, I'm sure, did raise in</p> <p>21 his meetings with senior management and the</p> <p>22 Home Office -- I'm sure he raised the issue of our</p> <p>23 difficulties with healthcare. And someone from</p> <p>24 healthcare may even have been present at those meetings.</p> <p>25 Q. Thank you. One of the things on that note that you say</p> <p style="text-align: center;">Page 107</p>
<p>1 would have to come and raise the matter for themselves.</p> <p>2 Q. Did they give data protection reasons or something like</p> <p>3 that?</p> <p>4 A. Yes, confidentiality.</p> <p>5 Q. You spoke a little earlier about staff at Brook House</p> <p>6 dissuading people from raising complaints. Did that</p> <p>7 just apply to staff, DCOs, DCMs, et cetera, or did that</p> <p>8 apply to healthcare staff as well, in your knowledge?</p> <p>9 A. I can't honestly remember whether any healthcare staff</p> <p>10 at that time told detained persons not to complain.</p> <p>11 Q. Was there a specific person, or people, within</p> <p>12 healthcare at Brook House that you were told to liaise</p> <p>13 with if you had a concern about someone's situation, or</p> <p>14 was it just the department as a whole?</p> <p>15 A. I think it was the department as a whole.</p> <p>16 Q. I've asked you, I suppose, about that type of thing in</p> <p>17 a couple of ways, about whether it was just an inbox</p> <p>18 or -- would having specific liaisons have been helpful</p> <p>19 to you?</p> <p>20 A. I'm not sure, because I think, after the given period,</p> <p>21 we did have a specific liaison, and that was no more</p> <p>22 successful.</p> <p>23 Q. No more helpful. Do you have one now?</p> <p>24 A. No, we don't. But what we used to do at the time was to</p> <p>25 call up healthcare and say, "A detained person has asked</p> <p style="text-align: center;">Page 106</p>	<p>1 is that you generally found healthcare to be dismissive</p> <p>2 of concerns and that action would rarely be taken, other</p> <p>3 than when you reported that a detained person was</p> <p>4 expressing thoughts of immediately committing suicide.</p> <p>5 In that specific example, where someone expressed</p> <p>6 immediate thoughts about committing suicide, what action</p> <p>7 would be taken in those circumstances?</p> <p>8 A. Well, all that would happen, we would be told that they</p> <p>9 would take immediate action.</p> <p>10 Q. Okay.</p> <p>11 A. Whereas, as I said before, whenever we told them about</p> <p>12 an issue, we would ask them to report it but they would</p> <p>13 not give us a verbal response to indicate the message</p> <p>14 was understood or action would be taken. In that case,</p> <p>15 there was a verbal response to indicate that action</p> <p>16 would be taken.</p> <p>17 Q. Where you told someone that a detained person had</p> <p>18 thoughts of immediately, or imminently, committing</p> <p>19 suicide, were you ever aware of rule 35 reports being</p> <p>20 completed in those situations?</p> <p>21 A. I wasn't aware of that.</p> <p>22 Q. Do you think you would have been aware if they had been</p> <p>23 completed?</p> <p>24 A. Only if the detained person was aware.</p> <p>25 Q. I want to move on to the next topic, which is about</p> <p style="text-align: center;">Page 108</p>

<p>1 staffing levels at Brook House, only relatively briefly,</p> <p>2 because we obviously have a fair amount of evidence</p> <p>3 about this issue. You discuss in your statement being</p> <p>4 aware of delays within various parts of Brook House, so</p> <p>5 visits, healthcare, welfare and front-line detention</p> <p>6 officers. You say in your statement, at paragraphs 176</p> <p>7 and 179 to 181, that staff would actually expressly tell</p> <p>8 you they felt overstretched and understaffing made their</p> <p>9 roles much more difficult. If we can bring up on</p> <p>10 screen, please, <VER000249> at page 21. Chair, that's</p> <p>11 tab 11 of your bundle.</p> <p>12 I think you said to Verita -- I'm just going to get</p> <p>13 the exact bit of the page -- that staff would talk to</p> <p>14 you about staffing levels often, and you said they are</p> <p>15 very, very understaffed; is that right?</p> <p>16 A. That was what they told me, yes.</p> <p>17 Q. In what context would they tell you it? Was this sort</p> <p>18 of said almost as an excuse or was it said just sort of</p> <p>19 off the cuff to vent frustration? Why would they be</p> <p>20 telling you?</p> <p>21 A. When I went into the centre, I'd try and build as big</p> <p>22 a rapport as I possibly could with the staff, just to</p> <p>23 make that part of the day pleasant. And sometimes, if</p> <p>24 I was left waiting in a room as part of the entry</p> <p>25 process, they would come and say, you know, "Really</p> <p style="text-align: center;">Page 109</p>	<p>1 incident occurred, there was no back-up. And -- and</p> <p>2 people described to me how it made me [sic] feel.</p> <p>3 That's why I made that comment.</p> <p>4 Q. We can bring that down, I think. But in your statement,</p> <p>5 at paragraph 181, you say:</p> <p>6 "One officer told me that if he became friendly with</p> <p>7 detained people this made it emotionally difficult if he</p> <p>8 was later instructed to be part of a team going into the</p> <p>9 cell with shields and full riot gear to restrain</p> <p>10 people."</p> <p>11 We heard evidence about almost exactly this issue</p> <p>12 from Callum Tulley, saying that he covered his face on</p> <p>13 one occasion, I think, when he had to -- was this just</p> <p>14 one officer that told you this?</p> <p>15 A. It was just one officer.</p> <p>16 Q. Was this during the relevant period?</p> <p>17 A. It was, yes.</p> <p>18 Q. Do you remember, was he sort of -- again, the context of</p> <p>19 this, was this an explanation as to why they couldn't be</p> <p>20 friendly with detained people, or what was it?</p> <p>21 A. He was explaining to me why he felt stressed in the job,</p> <p>22 and he was saying, you know, "It's not easy doing this</p> <p>23 job. You get to know people and then they look at you</p> <p>24 as if, like, 'What are you doing?', when you're dressed</p> <p>25 up in gear going into their room to restrain them".</p> <p style="text-align: center;">Page 111</p>
<p>1 sorry about this, but someone's just gone off on their</p> <p>2 break and there's no-one to cover, so I can't take you,</p> <p>3 so you'll have to wait a while". That could be quite</p> <p>4 a long time. So it would be, in that context, as an</p> <p>5 apology.</p> <p>6 Other times, I'd ask people how they were, and</p> <p>7 they'd just start complaining because they had a lot to</p> <p>8 complain about -- they had long shifts and the</p> <p>9 environment they were working in was not pleasant.</p> <p>10 I mean, in terms of the physicality of the building.</p> <p>11 And they would start complaining about short staffing</p> <p>12 making their lives a nightmare.</p> <p>13 Q. I've found it now, thankfully. At paragraph 296, it is</p> <p>14 here at the bottom of the page, that's where you say:</p> <p>15 "The officers talk to us about it. They are very,</p> <p>16 very understaffed and obviously that can make staff</p> <p>17 quite fearful and that doesn't help them to react calmly</p> <p>18 to situations."</p> <p>19 What did you mean by "fearful", do you remember?</p> <p>20 A. I think staff expressed to me that when they were on</p> <p>21 a wing, if there were very few officers on the wing,</p> <p>22 they felt kind of out of control; it made them feel out</p> <p>23 of control. I don't mean that they were acting out of</p> <p>24 control, but they just felt they didn't have control of</p> <p>25 what was happening. I think they were aware that if any</p> <p style="text-align: center;">Page 110</p>	<p>1 Q. Just finishing on the topic of staffing levels, you say</p> <p>2 at paragraph 184:</p> <p>3 "GDWG suspected that there might be a financial</p> <p>4 incentive to G4S to keep staffing levels at a minimum</p> <p>5 [in order] to maximise profit."</p> <p>6 On what basis did you come to that view?</p> <p>7 A. I just think you couldn't -- there could be no other</p> <p>8 reason for it, because it wasn't an operationally-sound</p> <p>9 practice. It didn't benefit their staff, it didn't</p> <p>10 benefit detained people. Therefore, one looks for what</p> <p>11 logical answer there could be and one can only think it</p> <p>12 must be financial.</p> <p>13 Q. The next topic I want to ask you about is oversight by</p> <p>14 the IMB, the Monitoring Board. At paragraph 187 of your</p> <p>15 statement, page 66, you say that, in your view, the IMB</p> <p>16 did not provide an adequate level of oversight and</p> <p>17 scrutiny during the relevant period; that they weren't</p> <p>18 sufficiently independent from Brook House management;</p> <p>19 that they weren't sufficiently critical of problems at</p> <p>20 Brook House; that they failed to deal with referrals</p> <p>21 from GDWG or foster a good relationship with you; and</p> <p>22 that they implicitly adopted Brook House managers'</p> <p>23 criticisms of your work. Is that fair, as a summary?</p> <p>24 A. It is, yes.</p> <p>25 Q. Do you have a view on why this developed at that time,</p> <p style="text-align: center;">Page 112</p>

<p>1 why this poor relationship, why this inadequate level of</p> <p>2 scrutiny, developed at that time?</p> <p>3 A. I think it built to this point over many years, and</p> <p>4 I can remember interactions with the IMB many years</p> <p>5 before which were similar.</p> <p>6 Q. To the best of your knowledge or your experience, was it</p> <p>7 the same people that stayed on the IMB for a while and</p> <p>8 so it was felt because the same person would sort of</p> <p>9 develop these views?</p> <p>10 A. I believe so, and when you look at the disclosures to</p> <p>11 the inquiry, very often it's one named individual making</p> <p>12 extraordinary statements about GDWG, and I think it</p> <p>13 would be interesting for the IMB to analyse how much</p> <p>14 power one individual in the IMB has in relation to</p> <p>15 policy.</p> <p>16 Q. If we can bring up <GDW000007>, please, and that's at</p> <p>17 tab 3 of your bundle, chair. Ms Pincus, this is</p> <p>18 a document which was disclosed by GDWG, and it is</p> <p>19 a document which arises from an interview carried out</p> <p>20 with Jackie Colbran of the IMB in September 2015. We</p> <p>21 understand it was carried out by a trustee of GDWG; is</p> <p>22 that right?</p> <p>23 A. That's correct.</p> <p>24 Q. It says "Stakeholder interview with the IMB". Just so</p> <p>25 we are clear about this, your organisation would carry</p> <p style="text-align: center;">Page 113</p>	<p>1 Q. I appreciate it's not written by you, but looking at</p> <p>2 what it says, is that something that you would echo? Is</p> <p>3 that something that rings true with you?</p> <p>4 A. It is, yes. I mean, I think it's important to say two</p> <p>5 things in terms of believing: (a) believing doesn't mean</p> <p>6 that we exercise no discretion at what we are told, so</p> <p>7 we understand that sometimes people exaggerate, that</p> <p>8 sometimes their understanding of the situation varies</p> <p>9 over time, that on occasion people tell untruths; but we</p> <p>10 also believe that if you deny that the person in front</p> <p>11 of you is telling you any form of truth, then you're</p> <p>12 denying the person. That's the most basic form of</p> <p>13 dehumanisation. If every person that presents to you is</p> <p>14 conditioning you, if they're being friendly, or feigning</p> <p>15 an illness, which were the types of things that were</p> <p>16 said by, for example, healthcare and G4S, if the IMB</p> <p>17 started to echo those patterns of thought that meant</p> <p>18 that every interaction with a detainee was potentially</p> <p>19 an interaction with a new falsehood, then they were</p> <p>20 absolutely denying the person in front of them. That's</p> <p>21 like the most basic form of dehumanisation.</p> <p>22 Q. This is in September 2015. In your experience, was this</p> <p>23 summary difference of your approach and the IMB's</p> <p>24 approach something that still rang true in 2017?</p> <p>25 A. Yes.</p> <p style="text-align: center;">Page 115</p>
<p>1 out interviews with different organisations and people</p> <p>2 you come into interaction with?</p> <p>3 A. Yes.</p> <p>4 Q. Just to get a flavour of what they were thinking?</p> <p>5 A. Work out if we were doing a good job, yes.</p> <p>6 Q. This was with Jackie Colbran, who is listed as the chair</p> <p>7 of the IMB. Is that the one individual you were talking</p> <p>8 about earlier?</p> <p>9 A. I think her name does appear many times in the</p> <p>10 disclosure, so yes.</p> <p>11 Q. Just reading from the top of here, in bold italics it</p> <p>12 says:</p> <p>13 "This was a friendly meeting of people who all want</p> <p>14 to help detainees but with a totally different view of</p> <p>15 the situation detainees are in. I think you could sum</p> <p>16 it up by saying they believe what G4S say and we believe</p> <p>17 what detainees say. They believe we could be so much</p> <p>18 more effective if we were 'friends' with G4S, ie if we</p> <p>19 were more like them!</p> <p>20 "Although our approach is very different to theirs</p> <p>21 I think we could fruitfully work together for the</p> <p>22 benefit of detainees."</p> <p>23 I presume that was written by your trustee?</p> <p>24 A. It was. This was an informal judgment that was just</p> <p>25 updating people internally as a result of a meeting.</p> <p style="text-align: center;">Page 114</p>	<p>1 Q. The relevant period. How about today? Is it something</p> <p>2 that rings true today?</p> <p>3 A. Today, there's a different chair of the IMB and there</p> <p>4 are some new members. I had a meeting with the IMB in</p> <p>5 2019 and I could see a clear divide between some of</p> <p>6 the people who had been in the organisation for a long</p> <p>7 time, some of the newer members. Some people were</p> <p>8 definitely more keen to engage with us. The current</p> <p>9 chair, who has been with the IMB for a number of years,</p> <p>10 has been meeting us regularly for us to exchange our</p> <p>11 impressions and experiences of what's happening in</p> <p>12 Brook House and, at the time of the period in question</p> <p>13 for the inquiry, if we raised a matter to the IMB, they</p> <p>14 would go first and foremost to management -- to officers</p> <p>15 to check out the situation, and they would take their</p> <p>16 view of the situation, which was usually that everything</p> <p>17 was fine.</p> <p>18 Today, I really believe that the IMB are currently</p> <p>19 also going -- also, or first, going to speak to the</p> <p>20 detained person, which I think is as it should be.</p> <p>21 Q. We can see on this document, which, again, is obviously</p> <p>22 from September 2015, towards the first hole punch, which</p> <p>23 obviously you can't see on the screen, it has got some</p> <p>24 quotes. Is it your understanding that those quotes are</p> <p>25 things that were said by Jackie Colbran?</p> <p style="text-align: center;">Page 116</p>

<p>1 A. Yes.</p> <p>2 Q. One of the things it says is there is an element of</p> <p>3 suspicion about you. What do you take that to mean?</p> <p>4 A. "There is an element of suspicion about you". My</p> <p>5 understanding of that is she was reflecting the views of</p> <p>6 G4S or the Home Office, because she's not saying, "We</p> <p>7 are suspicious about you".</p> <p>8 Q. To the best of your experience, was that suspicion still</p> <p>9 something that applied during the relevant period as</p> <p>10 well?</p> <p>11 A. It is.</p> <p>12 Q. Then towards the bottom of the page, under "What could</p> <p>13 we do better", it says:</p> <p>14 "Get a better relationship with senior management.</p> <p>15 You would be more effective if you had a positive</p> <p>16 relation with Ben and Steve Skitt."</p> <p>17 I presume "Ben" there, to the best of your</p> <p>18 knowledge, is Ben Saunders, the former director of</p> <p>19 Brook House?</p> <p>20 A. Yes.</p> <p>21 Q. Do you think that approach of the IMB thinking that you</p> <p>22 needed to be more positive with Ben Saunders and</p> <p>23 Steve Skitt, was that still something that applied</p> <p>24 during the relevant period?</p> <p>25 A. I think it was.</p> <p style="text-align: center;">Page 117</p>	<p>1 complain to the IMB during that period?</p> <p>2 A. We would have, but we would also have managed their</p> <p>3 expectations by explaining that the IMB had limited</p> <p>4 resources, so the day they put their complaint in, it</p> <p>5 wouldn't be the case that they'd have -- meet an IMB</p> <p>6 member within the next day or so, because they were</p> <p>7 coming into the centre less frequently than that.</p> <p>8 Q. Now do you have confidence in detained people making</p> <p>9 complaints to the IMB?</p> <p>10 A. I would be more optimistic than I was then. The</p> <p>11 document that you're referring to, there's a couple of</p> <p>12 other extraordinary parts, and one is where the IMB said</p> <p>13 it would be better if no-one was permitted to visit the</p> <p>14 same detainee for more than three months, which showed</p> <p>15 an extraordinary lack of insight into the detained</p> <p>16 persons' experience.</p> <p>17 Q. Do you have any idea where they were coming from with</p> <p>18 that suggestion, like why they thought it would be</p> <p>19 better?</p> <p>20 A. They were saying you should be friendly, but not</p> <p>21 friends, it would be better if no-one was permitted to</p> <p>22 visit the same detainee for more than three months. It</p> <p>23 was almost like we were, I don't know, fraternising with</p> <p>24 the enemy or something. It was an "us and them" kind of</p> <p>25 thing.</p> <p style="text-align: center;">Page 119</p>
<p>1 Q. And the suggestion, as noted at the bottom:</p> <p>2 "They suggested that we should get the detainees to</p> <p>3 complain, rather than complaining ourselves and</p> <p>4 mentioned their IMB complaints box but did say that it</p> <p>5 wasn't emptied very often."</p> <p>6 Was that your approach, that you would try and</p> <p>7 facilitate the complaint from the detainee themselves</p> <p>8 first, and then only make the complaint yourselves if</p> <p>9 they were unwilling to do so?</p> <p>10 A. Yes, because the whole basis of the charity is that we</p> <p>11 are trying to empower people, not trying to infantilise</p> <p>12 them by doing things on their behalf. So we'd do things</p> <p>13 on their behalf if they requested it or couldn't, but</p> <p>14 we'd always try to work with the person so they felt</p> <p>15 they had some agency.</p> <p>16 Q. We have talked a little bit in the context of complaints</p> <p>17 about the lack of confidence that both you, as an</p> <p>18 organisation, and detained people had in the complaints</p> <p>19 process, where they felt, you know, one person's word</p> <p>20 against another or it wouldn't be substantiated. When</p> <p>21 it comes to complaints to the IMB, during the relevant</p> <p>22 period, did you have confidence in that complaints</p> <p>23 avenue?</p> <p>24 A. We didn't, no.</p> <p>25 Q. Would you have advised people, detained people, to</p> <p style="text-align: center;">Page 118</p>	<p>1 Q. This is obviously, as we have said a few times, in 2015.</p> <p>2 There was a meeting held with the IMB in November 2017,</p> <p>3 just after Panorama and the relevant period, which</p> <p>4 I know you didn't attend, and so I will be able to ask</p> <p>5 James Wilson a bit more about that tomorrow. But you do</p> <p>6 address in your statement the fact that, during that</p> <p>7 meeting, someone from the IMB described much of Panorama</p> <p>8 as being "fluff" and suggested that Panorama was just</p> <p>9 showing extreme moments unrepresentative of day-to-day</p> <p>10 experiences of detained people. What's your reflection</p> <p>11 on that, on those comments?</p> <p>12 A. I just found it unbelievably shocking.</p> <p>13 Q. Why?</p> <p>14 A. Because the level of depravity in the footage was</p> <p>15 extraordinary, and I would have expected the IMB to be</p> <p>16 deeply shocked and reflective about it having happened</p> <p>17 on their watch.</p> <p>18 Q. You've said in your statement that you think that this</p> <p>19 is all a reflection of the IMB's tendency to accept</p> <p>20 uncritically what went on, to overlook or fail to</p> <p>21 empathise with detained persons and to overempathise</p> <p>22 with Brook House management. Can you give any insight</p> <p>23 as to why you think that that happened, that there was</p> <p>24 an underempathy with detained people and an overempathy</p> <p>25 with Brook House management?</p> <p style="text-align: center;">Page 120</p>

<p>1 A. No. I mean, I don't know whether, over time, people 2 become inured to the suffering that they see when it 3 happens repeatedly, but other people who understand more 4 about how cultures develop in institutions I think would 5 be able to explain that rather than me. 6 Q. You talk about this tendency to accept uncritically and 7 failing to empathise with detained people, 8 overempathising with Brook House management. Do you 9 think that position remains the case today, or is there 10 an improvement? 11 A. I don't think I see enough of the day-to-day work to be 12 able to comment on that. 13 Q. I just wanted to ask you a few more questions about the 14 current position at Brook House now. You understand 15 that the inquiry is looking at the relevant period in 16 2017 but needs to understand a bit about the current 17 situation so that the chair can be assisted with making 18 recommendations in due course. 19 I asked you before about whether, on reflection, you 20 felt that there was anything that you could have done as 21 an organisation to understand more about the severity of 22 the mistreatment that was shown in Panorama, and you 23 said that, with the access that you had been given, you 24 didn't think there was anything. Have there been any 25 changes made to your own policies and procedures since</p> <p style="text-align: center;">Page 121</p>	<p>1 too frequently and that too often disproportionate force 2 is used, causing injuries. I'm asked to ask you 3 a rule 10 on behalf of Bhatt Murphy, which is, how do 4 you think the number of reports of disproportionate 5 force now compares to the relevant period? Can you 6 compare them? 7 A. It's very, very difficult to compare numbers because the 8 number in the centre is so much lower now. 9 Q. I suppose the number of -- I suppose the proportion of 10 people you speak to that are complaining about that type 11 of thing. Are you able to help us in that sense? 12 A. I think if you were to look at the numbers of people 13 going to segregation, you would gain a sense of 14 the numbers of people who feel they have experienced 15 disproportionate force. 16 Q. You think those two go essentially hand in hand? 17 A. Mmm-hmm. 18 Q. We have talked, obviously, about the complaints 19 processes. Do you think that there continues to be 20 a culture of detained people feeling it is pointless to 21 raise complaints or that doing so could put them at risk 22 of jeopardising their immigration case? 23 A. Yes, I think people are very fearful of complaining. 24 Q. One of the things that you refer to in your statement 25 when we're looking at the current situation is, you say,</p> <p style="text-align: center;">Page 123</p>
<p>1 Panorama was broadcast in order to try and get a better 2 understanding? 3 A. I mean, so many changes -- 4 Q. So any changes that -- 5 A. -- in our work since 2017. 6 Q. I suppose, any changes that you can think of that, to 7 your knowledge, were done specifically to try and get 8 a handle on the stuff that was shown in Panorama? 9 A. That's quite difficult to answer that, sorry. 10 Q. In terms of drop-in sessions today, or now, are these 11 occurring in person again post Covid, or are they -- 12 A. They are, yes. 13 Q. Do they continue to be in the legal visits corridor at 14 the moment? 15 A. They do, yes. 16 Q. Are detainees still required to go through a security 17 search and barred gate to reach you? 18 A. They are, yes. 19 Q. You say you have suggested to Serco they could 20 potentially take place in the library and they are 21 considering that at the moment; is that right? 22 A. Yes. 23 Q. One of the things you say in your statement -- at 24 paragraph 214, for the transcriber -- is that you 25 continue to be told that control and restraint is used</p> <p style="text-align: center;">Page 122</p>	<p>1 first of all, at paragraph 52, that there was a group of 2 detained people in 2020/21 who were highly vulnerable, 3 and then you come on at paragraph 221 to quote from the 4 IMB's annual report, which I think was published 5 in May 2021. 6 A. Mmm-hmm. 7 Q. I'm just going to read to you what you quote. So that 8 report said: 9 "The combination of the compressed nature of 10 the charter flight programme with Brook House as its 11 sole basis for Dublin Convention flights, and the 12 fundamental changes in the centre's population and 13 nationalities, their different vulnerabilities and their 14 needs, put the centre's systems, detainees and staff 15 under great stress and raised some serious concerns for 16 the board. Most notably, there was a dramatic increase 17 in levels of self-harm and suicidal ideation, 18 deficiencies in the induction process and increased 19 needs for legal support and ... rule 35 assessments." 20 Then you continue -- this is what the IMB were 21 saying: 22 "The board's view is that, due to circumstances 23 related to the Dublin Convention charter programme, in 24 the latter months of 2020 Brook House was not a safe 25 place for vulnerable detainees who had crossed the</p> <p style="text-align: center;">Page 124</p>

<p>1 channel in small boats."</p> <p>2 They said:</p> <p>3 "This is evidenced by the high levels of self-harm</p> <p>4 and suicidal ideation in that time."</p> <p>5 You then quote them saying:</p> <p>6 "The board's view is that circumstances in</p> <p>7 Brook House related to the Dublin Convention charter</p> <p>8 programme amounted to inhumane treatment of the whole</p> <p>9 detainee population by the Home Office in the latter</p> <p>10 months of 2020."</p> <p>11 And they also note "serious delays in access to</p> <p>12 rule 35 assessments during August through December."</p> <p>13 Casting your mind back to the latter half of 2020,</p> <p>14 last year, does that accord with your experience at</p> <p>15 Gatwick Detainee Welfare Group?</p> <p>16 A. Yes, we would agree with the IMB.</p> <p>17 Q. Do you have anything to add or any more comment to make</p> <p>18 about what they say?</p> <p>19 A. At that time, the people who had come across on small</p> <p>20 boats and been housed in the community were brought to</p> <p>21 detention, without knowing that that would be</p> <p>22 a possibility, and were in great distress. Most of them</p> <p>23 didn't speak English. A good proportion of them were</p> <p>24 victims of trafficking, but were never assessed as such,</p> <p>25 and because there were large numbers of people going</p> <p style="text-align: center;">Page 125</p>	<p>1 impressions, then that's definitely something I would</p> <p>2 share. I don't think it would be severe enough for</p> <p>3 a formal complaint.</p> <p>4 Q. Do you think that, physically, you would have been able</p> <p>5 to -- you said that you sort of wanted to kneel down</p> <p>6 next to them. Do you think you would be able to do that</p> <p>7 now?</p> <p>8 A. I think I would have more confidence to do that, yes.</p> <p>9 MR LIVINGSTON: Chair, that's all the questions I have for</p> <p>10 Ms Pincus. Do you have any questions, chair?</p> <p>11 THE CHAIR: Thank you. Just a few.</p> <p>12 The first one I'll ask you is just in relation to</p> <p>13 that last point, really. So in your role as</p> <p>14 safeguarding lead now, do you ever get invited to the</p> <p>15 safer custody management or safer community management</p> <p>16 meetings with G4S?</p> <p>17 A. No.</p> <p>18 THE CHAIR: Do you know if anybody else from your</p> <p>19 organisation does?</p> <p>20 A. No-one does.</p> <p>21 THE CHAIR: That has not happened historically either, or</p> <p>22 did it happen in the relevant period, from your memory?</p> <p>23 A. That's never happened.</p> <p>24 THE CHAIR: Can I ask, you have an opinion on whether that</p> <p>25 would be helpful?</p> <p style="text-align: center;">Page 127</p>
<p>1 through the centre, the delays for them getting legal</p> <p>2 advice were considerable. So it was an extraordinarily</p> <p>3 difficult time.</p> <p>4 Q. I'm asked to ask you on behalf of Bhatt Murphy, we have</p> <p>5 spoken about how, during the relevant period, you were</p> <p>6 worried at GDWG about making complaints because of</p> <p>7 a fear about antagonising Brook House management or the</p> <p>8 Home Office. Looking at the position now, if you,</p> <p>9 yourself, or your organisation, witnessed or overheard</p> <p>10 ill-treatment, would you feel able to intervene or</p> <p>11 complain?</p> <p>12 A. I would, yes.</p> <p>13 Q. You're obviously the director now and the safeguarding</p> <p>14 lead. Is that the message which you have given to your</p> <p>15 staff as well?</p> <p>16 A. It is, yes.</p> <p>17 Q. So, to give a very, I suppose, stark example, the</p> <p>18 example you gave about seeing the detained person on the</p> <p>19 floor and wanting to kneel down and help them after</p> <p>20 they'd been refused bail, is that something that you</p> <p>21 think now you would feel able to intervene in?</p> <p>22 A. That was a general manifestation of how people were</p> <p>23 unskilled in being able to relate to a vulnerable</p> <p>24 person. If I had a relationship where I was meeting the</p> <p>25 head of the centre and I could talk through my</p> <p style="text-align: center;">Page 126</p>	<p>1 A. Any opportunity to engage constructively with the centre</p> <p>2 would be helpful, yes.</p> <p>3 THE CHAIR: Thank you, that's really helpful. So my other</p> <p>4 questions relate to some of the evidence you gave us</p> <p>5 a little earlier, so my apologies if they might be</p> <p>6 slightly out of context. You mentioned the need for us</p> <p>7 to be mindful of the fact that, often, when detained</p> <p>8 people are complaining, they may be moved elsewhere</p> <p>9 around the immigration detention estate and so it can be</p> <p>10 difficult to kind of maybe track what happens to that</p> <p>11 complaint. Did you have any sense that there was</p> <p>12 anything deliberate about that? Do you think there was</p> <p>13 a connection between people complaining and then them</p> <p>14 being moved or was it just that was the way the system</p> <p>15 worked?</p> <p>16 A. I don't know if it was allied to complaints, but</p> <p>17 sometimes, if people encountered situations where they</p> <p>18 became difficult for the centre to manage, they would be</p> <p>19 moved on on their way, and, of course, those were</p> <p>20 exactly the type of events where there would be</p> <p>21 interactions that could create a complaint to arise.</p> <p>22 THE CHAIR: Thank you. Then my final question: you</p> <p>23 mentioned also a little earlier in your evidence about</p> <p>24 the fact that staff names would be seen on a lanyard</p> <p>25 that they would often kind of wear around their neck,</p> <p style="text-align: center;">Page 128</p>

<p>1 perhaps.</p> <p>2 A. Yes.</p> <p>3 THE CHAIR: Would you, yourself, know how to -- would you be</p> <p>4 able to identify a member of staff by name that you</p> <p>5 would see frequently? Would you have been able to see</p> <p>6 the name on the lanyard, for example?</p> <p>7 A. No. No. In fact, there were some staff that I might</p> <p>8 have known for many years and, you know, be embarrassed</p> <p>9 to ask them their name because of feeling I ought to</p> <p>10 know them, having seen them so many times. I'd have no</p> <p>11 way of establishing their name.</p> <p>12 THE CHAIR: Again, did you get any sense that that was in</p> <p>13 any way deliberate, that people were not displaying</p> <p>14 their name, or was it just simply the fact that it's on</p> <p>15 a lanyard and sometimes you can see it and sometimes you</p> <p>16 can't?</p> <p>17 A. I think with me on the visits corridor, it was probably</p> <p>18 accidental, but my impression is that, in the centre, if</p> <p>19 someone was doing something and they wanted to be</p> <p>20 unaccountable, that would be a way of enabling that to</p> <p>21 happen.</p> <p>22 THE CHAIR: Did you ever have any complaints in respect of</p> <p>23 that, or is that just your impression?</p> <p>24 A. No, people would say, "I wanted to raise a complaint.</p> <p>25 I asked another officer what the officer's name was and</p> <p style="text-align: center;">Page 129</p>	<p>1 Reading in Evidence re D87</p> <p>2 MS MOORE: D87 was detained in Brook House between 22 March</p> <p>3 and 14 July 2017. He is a Nigerian national and was</p> <p>4 41 years old during the relevant period. The inquiry</p> <p>5 attempted to contact him in October 2020, but has not</p> <p>6 managed to make contact with him. He has never provided</p> <p>7 a witness statement to the inquiry or, as far as we have</p> <p>8 seen, in any other context, but we do have his account</p> <p>9 of certain events which happened during his detention</p> <p>10 because he spoke to the Professional Standards Unit, the</p> <p>11 PSU, about them and he is also feature on some footage.</p> <p>12 A brief record on 12 April 2017 shows that D87 was</p> <p>13 stopped by a member of staff whose name is not on their</p> <p>14 note. Chair, this is at <CJS004739> page 2. When asked</p> <p>15 what he was doing, he said he was collecting the</p> <p>16 signatures of detained people with families and children</p> <p>17 in the UK, to raise human rights issues to the</p> <p>18 Home Office, and D87 himself has a partner and a young</p> <p>19 family in the UK.</p> <p>20 The staff member's note, which I've given you the</p> <p>21 reference for, says:</p> <p>22 "I explained that he should be fighting his own</p> <p>23 cause and not everyone else's and [D87] said that he</p> <p>24 wanted to have a meeting with Home Office to tell them</p> <p>25 about people being detained. I explained that he could</p> <p style="text-align: center;">Page 131</p>
<p>1 he wouldn't tell me".</p> <p>2 THE CHAIR: I believe you've mentioned that in some of your</p> <p>3 evidence.</p> <p>4 A. Yes.</p> <p>5 THE CHAIR: Thank you very much. They are all my questions.</p> <p>6 MR LIVINGSTON: Thank you, chair, and thank you, Ms Pincus.</p> <p>7 Chair, if you are agreeable to it, I think the idea</p> <p>8 now would be to have a 15-minute break and then return</p> <p>9 for some reading in of detained person evidence.</p> <p>10 I think that reading in should take about 45 minutes,</p> <p>11 half an hour to 45 minutes.</p> <p>12 THE CHAIR: That's fine. We will return at 2.55 pm. If</p> <p>13 I can just thank you for your evidence. You have been</p> <p>14 with us for a long day and I know it is not an easy</p> <p>15 experience but I'm very grateful. So thank you very</p> <p>16 much.</p> <p>17 A. Thank you.</p> <p>18 (The witness withdrew)</p> <p>19 THE CHAIR: I will see the rest of you in 15 minutes.</p> <p>20 (2.39 pm)</p> <p>21 (A short break)</p> <p>22 (2.59 pm)</p> <p>23 MS MOORE: Thank you, chair. We will be moving to some</p> <p>24 read-in evidence on behalf of detained persons. The</p> <p>25 first account is on behalf of D87.</p> <p style="text-align: center;">Page 130</p>	<p>1 be deemed as inciting others -- [D87] said that wasn't</p> <p>2 his agenda and he doesn't want to cause trouble -- he</p> <p>3 just wanted to make a statement. Again, I offered him</p> <p>4 words of advice about 'stirring up emotions' and he said</p> <p>5 that he speaks to truth -- but peacefully."</p> <p>6 Chair, D87's records show that, on 21 April 2017, he</p> <p>7 was due to be transferred to the Verne, an immigration</p> <p>8 detention centre in Dorset. However, he refused to go</p> <p>9 to reception, saying the Verne was too far away from his</p> <p>10 family. He was not transferred. On 31 May 2017, he was</p> <p>11 moved to a single occupancy room. Documents</p> <p>12 representing to those events are at <CJS003531> pages 4</p> <p>13 and 6.</p> <p>14 On 9 May 2017, D87 was again meant to be transferred</p> <p>15 to the Verne. Some of the events of this day featuring</p> <p>16 D87 were filmed by Callum Tulley, along with discussions</p> <p>17 about the events between staff.</p> <p>18 The transcripts, which are all within <TRN0000077></p> <p>19 at pages 7 to 16, 19 to 30 and 35 to 39, include</p> <p>20 discussions about the planned transfer, D87 speaking to</p> <p>21 Brook House staff about not wanting to go to the Verne,</p> <p>22 including because his children were able to visit him at</p> <p>23 Brook House, and then being told he needed to be</p> <p>24 presented to Tascor so he can explain those reasons to</p> <p>25 them. He then went with the Brook House staff and was</p> <p style="text-align: center;">Page 132</p>

<p>1 met by Tascor. D87 again said he did not want to go.</p> <p>2 He asked to see a member of healthcare staff who took</p> <p>3 his blood pressure, which was normal. He said he had</p> <p>4 only been given 30 minutes' notice to move and that he</p> <p>5 understood he was being moved due to bed space. Indeed,</p> <p>6 the earlier footage does record Shane Farrell telling</p> <p>7 D87 "Immigration, Home Office, whatever you want to call</p> <p>8 them. Spoken to them, okay, and they just told me that</p> <p>9 the reasons is they're trying to move out the single</p> <p>10 occs out of here to create more bed space". D87 said</p> <p>11 that if he had to move, he would want to go to another</p> <p>12 London-based centre, and he said to a Tascor agent:</p> <p>13 "If you was taking me to Harmondsworth or Colnbrook</p> <p>14 I'd go with you. It's in London. That's even closer to</p> <p>15 my family."</p> <p>16 He told the removal team that he had explained this</p> <p>17 to the Home Office. Eventually, after protracted</p> <p>18 discussions about his transfer, which he remained</p> <p>19 opposed to, the removal was abandoned. D87 returned to</p> <p>20 E wing. Further footage shows him complaining to</p> <p>21 Mr Paschali and Mr Tulley about the events of the day</p> <p>22 and about being returned to E wing rather than to</p> <p>23 a standard residential wing, which he had been told he</p> <p>24 could return to. When he is told that he's in E wing</p> <p>25 but not in solitary confinement, he says, "Block is</p> <p style="text-align: center;">Page 133</p>	<p>1 to say about that.</p> <p>2 Chair, the most significant events involving D87</p> <p>3 occurred on the night of 30 June 2017. This is when D87</p> <p>4 was relocated from E wing back to the CSU under rule 40.</p> <p>5 There was a further event later that night when centre</p> <p>6 staff entered D87's room on the CSU.</p> <p>7 D87 made complaints about both of these events,</p> <p>8 which were investigated by the PSU, and the events of</p> <p>9 that night were also referred to Sussex Police.</p> <p>10 D87 has described his recollection of events to the</p> <p>11 PSU and we have a very detailed note of his interview</p> <p>12 with the PSU, which is at <HOM002721>. This interview</p> <p>13 was carried out by telephone as D87 was, at the time,</p> <p>14 still within the CSU.</p> <p>15 Chair, the first event that night started about</p> <p>16 5.00 pm. What follows is from the account that he gave</p> <p>17 to the PSU.</p> <p>18 D87 described being released from CSU back to E wing</p> <p>19 but still segregated. He asked DCM Dean Brackenridge</p> <p>20 about this situation and, when no sufficient answer was</p> <p>21 given, he said he would "deal with G4S". He later told</p> <p>22 the PSU he meant this in a legal sense, not as</p> <p>23 a personal threat to staff.</p> <p>24 He says his door opened at about 5.20 pm and he was</p> <p>25 told he would be moved back to CSU due to making</p> <p style="text-align: center;">Page 135</p>
<p>1 block, you're segregating me, that's what it means".</p> <p>2 During his time at Brook House, D87 made a number of</p> <p>3 complaints against the head of security, Michelle Brown,</p> <p>4 including allegations that she victimised him and was</p> <p>5 instrumental in his being wrongly placed in removal from</p> <p>6 association. That's rule 40.</p> <p>7 On 29 June 2017, D87 made a written complaint, which</p> <p>8 we have at <HOM003105>. He said that he had been</p> <p>9 speaking to the drug and alcohol support team about how</p> <p>10 it was important for staff to know the signs of spice</p> <p>11 users. He said that, unexpectedly, the woman he had</p> <p>12 spoken to told the head of security, Michelle Brown,</p> <p>13 that D87 had threatened to take a member of staff</p> <p>14 hostage, which he said he had not. He wrote that</p> <p>15 Michelle Brown had in the past segregated him for no</p> <p>16 reason, then authorised his removal from association,</p> <p>17 with no evidence of what was alleged to have been said.</p> <p>18 This had happened, he said, on 27 June, and then he</p> <p>19 said, on the 28th, Michelle Brown again authorised</p> <p>20 a rule 40 against him. He wrote that Michelle Brown was</p> <p>21 out to get him, although he did not know why.</p> <p>22 He made a further complaint about his removal from</p> <p>23 association and about Ms Brown on 30 June, which is at</p> <p>24 <HOM003106>, adding that he challenged her to contact</p> <p>25 the police about the allegation and that she had nothing</p> <p style="text-align: center;">Page 134</p>	<p>1 threats. Shortly after, he said a number of officers</p> <p>2 entered his room wearing protective equipment and with</p> <p>3 no warning, and without having a conversation about what</p> <p>4 was happening and why. D87 told the PSU he remained</p> <p>5 compliant. He said they struggled to hold him but that</p> <p>6 he was using resistance and not aggression.</p> <p>7 In his own words, again as recorded by PSU, he says</p> <p>8 that then "They floored me, they slammed me onto the</p> <p>9 floor; we all fell to the floor together, I was on my</p> <p>10 back. The two officers that were holding me, we all</p> <p>11 fell to the floor together; and another officer grabbed</p> <p>12 my head and pinned it onto the floor". D87 then told</p> <p>13 the PSU investigator that he walked to the CSU and sat</p> <p>14 down while they left the room. This event, he said,</p> <p>15 amounted to an assault. He told the PSU he did not</p> <p>16 believe they had simply misunderstood what he said as</p> <p>17 being a threat. Rather, that it was a conspiracy, to</p> <p>18 use his words, to punish him. He believed</p> <p>19 Michelle Brown was behind it, although she was not</p> <p>20 present.</p> <p>21 D87 said that, as a result of this incident, he</p> <p>22 sustained a painful knee, bruises on his arms and grazes</p> <p>23 on both elbows. He said that he did not at that point</p> <p>24 receive any medical attention.</p> <p>25 The second incident he spoke to the PSU about</p> <p style="text-align: center;">Page 136</p>

<p>1 happened shortly after he had been put in the room in 2 the CSU, so on the same night. Again, this is his 3 account.</p> <p>4 D87 had covered the observation flap with tissue 5 because people looking in were making him agitated. 6 Officers then went around the back of the wing to look 7 in through the window, as there were no curtains on the 8 windows, which he saw as an invasion of privacy. He was 9 also upset as he had not eaten. He began to get 10 frustrated as he was being watched and started to ask 11 for water and food and to say, "This is a human rights 12 breach". He says no-one explained why he could not have 13 food and water, and hours passed. In D87's words, 14 "I was so frustrated that I actually started thinking 15 that I was going to hurt myself. So the sheet that was 16 in the room, I took it, the bed sheet, and put it around 17 my neck, not in a way that I was tying my neck or 18 anything, just for attention. I did it purely for 19 attention so that the door could open and I could get 20 food".</p> <p>21 He says this went on for five to ten minutes. Then 22 he made pretend choking noises and stopped talking, and 23 some of the female staff on E wing were concerned. He 24 said he then leant towards the wall with his head down 25 silently for an hour or more. His flap was covered, but</p> <p style="text-align: center;">Page 137</p>	<p>1 they were told to and told they would be disciplined if 2 they did not.</p> <p>3 He said he was seen by a doctor five days later.</p> <p>4 The inquiry has seen records which show that D87 5 remained on CSU under rule 40 from 30 June to 6 14 July 2017, ie, until he left Brook House. These are 7 at <CJS001419>. The reason for the use of rule 40 is 8 recorded as maintaining the good order and security of 9 the centre.</p> <p>10 On 2 July 2017, D87 made a further complaint about 11 Michelle Brown and his detention in CSU, which is at 12 <HOM003107>. He wrote that Michelle Brown was supposed 13 to be in charge of security, "and yet Brook House is 14 drug infested, ie, spice". He accuses her of picking on 15 people she did not like and of using "her power and 16 authority to impose punishment on her victims". He said 17 that she continues to make unfounded accusations against 18 him. He says on the complaint form that he had asked 19 Mrs Brown if they had met before and, "She said that she 20 met me once when I was collecting names of detainees who 21 had British-born children and she advised me not to do 22 that because it might be deemed as an incitement. When 23 I said, 'Could that be the reason you might be picking 24 on me?', she said no". He said he asked her about her 25 judgment and where she gets information and eventually</p> <p style="text-align: center;">Page 139</p>
<p>1 from the back of the room he could be observed through 2 the window. He kept his eyes a little open and so could 3 see people watching him but not helping, which he found 4 "chilling". They kept asking him to uncover the panel, 5 but he remained silent and they did not enter.</p> <p>6 He said the door finally opened after an hour or 7 more and "13 geared-up officers", in his words, entered, 8 some with shields. He said he was attacked by them 9 while on the floor. He have said they cut the fabric 10 which was loosely around his neck, took his trainers and 11 took the bedsheets, mattresses, pillow and clothes from 12 the room. He said they struck him with the shields and 13 he could not react as he was not expecting it. They 14 left the room within three to four minutes. He said he 15 was now very upset and shouted until he lost his voice, 16 including saying that he hoped the staff would die and 17 likening them to the KKK. He says he was not examined 18 by a doctor or a nurse after the incident, although his 19 face was injured and his whole body hurt. He said, 20 although he was still supposed to be on a four-man 21 unlock, in fact, the staff on CSU that night were people 22 he knew and who were worried about him and opened his 23 door, chatted to him and gave him cigarettes. He said 24 two of the officers involved in the first incident 25 attended his room and said they had only done so because</p> <p style="text-align: center;">Page 138</p>	<p>1 she "stormed off" and authorised another 24-hour 2 segregation.</p> <p>3 On 26 July 2017, then deputy director of the Gatwick 4 IRCs and head of Brook House, Steve Skitt, wrote to D87 5 to tell him that the complaints about Michelle Brown had 6 been investigated and not upheld. In summary, the 7 response was that the decisions to place D87 on rule 40 8 were due to his own behaviour, including that he had 9 made threats to staff. Mr Skitt's letter is at 10 <HOM002361> and summarises both the complaints and the 11 response.</p> <p>12 There was also an investigation into D87's 13 complaints regarding 30 June by the PSU and a report was 14 produced. D87 was interviewed, as I have mentioned, by 15 phone on 11 July 2017. The PSU also considered footage 16 and staff accounts, which have also been provided to the 17 inquiry.</p> <p>18 By letter dated 21 September 2017, D87 was informed 19 of the PSU's findings. He had left Brook House by that 20 point. The letter he received is at <HOM002364>. The 21 PSU's detailed report is at <HOM003153> and then there 22 is a brief closure report at <HOM002363>. The PSU found 23 his complaints were both unsubstantiated. Chair, the 24 accounts of others interviewed by PSU and the 25 investigations carried out by G4S and the PSU in</p> <p style="text-align: center;">Page 140</p>

<p>1 relation to those events will be considered during</p> <p>2 phase 2.</p> <p>3 THE CHAIR: Thank you.</p> <p>4 MS MOORE: Next, there's reading-in evidence in relation to</p> <p>5 the detained person we have been calling D2054.</p> <p>6 Reading in Evidence re D2054</p> <p>7 MS MOORE: D2054 is a Nigerian man who was detained at</p> <p>8 Brook House for just under two weeks, from</p> <p>9 15 to 28 June 2017. He has not provided a statement to</p> <p>10 the inquiry and the inquiry has not been in contact with</p> <p>11 him, but we have his own account of certain events</p> <p>12 because he made complaints to the PSU and we have</p> <p>13 documents relating to his time in Brook House.</p> <p>14 D2054 arrived in the UK around March 2005 on a visit</p> <p>15 visa. In 2016, he was arrested as an overstayer. He</p> <p>16 submitted a claim under article 8 and later a leave to</p> <p>17 remain application based on his long residence in the UK</p> <p>18 and his family and private life, but both were refused.</p> <p>19 He was detained at Tinsley House in 2016. However, on</p> <p>20 4 June 2016, a rule 35(3) assessment by the doctor</p> <p>21 there, at Tinsley House, concluded that his significant</p> <p>22 scarring was consistent with his claim to have been</p> <p>23 tortured. The Home Office accepted that the rule 35</p> <p>24 report constituted independent evidence of torture and</p> <p>25 he was released from detention. He claimed asylum</p> <p style="text-align: center;">Page 141</p>	<p>1 country". He said the food at Brook House upset his</p> <p>2 stomach so he had not been taking the servery food. She</p> <p>3 suggested he make an appointment with the mental health</p> <p>4 nurse as well as speak to the solicitor when they</p> <p>5 visited.</p> <p>6 He was seen by Dr Oozeerally on 27 June, who noted:</p> <p>7 "Food refusal prev for five days."</p> <p>8 He was seen later that day by the mental health</p> <p>9 nurse in his room and she recorded that he was feeling</p> <p>10 a bit stressed. A mental health appointment was booked</p> <p>11 for 29 June. It is not clear whether the nurse knew</p> <p>12 about the removal directions in place.</p> <p>13 D2054 complained to the PSU about events on</p> <p>14 28 June 2017 and we have his account of what he says</p> <p>15 happened.</p> <p>16 D2054's account of the day can be found in an email</p> <p>17 he sent to the PSU after his removal and the PSU's</p> <p>18 records of further correspondence with him. We have</p> <p>19 these at <CJS001627>.</p> <p>20 He said, while in Brook House, he was starved for</p> <p>21 five days without food as he would only eat boiled</p> <p>22 potatoes and the other food made him ill, and he wasn't</p> <p>23 always provided with food he could eat. He told the PSU</p> <p>24 that healthcare said he had lost 3kg in five days.</p> <p>25 He recalls that, on 28 June, he was given food</p> <p style="text-align: center;">Page 143</p>
<p>1 around this time, which was refused on 23 November 2016.</p> <p>2 Chair, documents relating to those events and to his</p> <p>3 ongoing detention are at <HOM022941> and <HOM015482>.</p> <p>4 On 15 June 2017, while reporting as he was required</p> <p>5 to do due to his immigration status, he was detained and</p> <p>6 transferred to Brook House. On 19 June, he submitted</p> <p>7 further representations in support of an application for</p> <p>8 asylum. On 21 June, removal directions were set; that</p> <p>9 is, a place was booked for him on a charter flight to</p> <p>10 Lagos in Nigeria for 28 June. His detention review from</p> <p>11 21 June notes that he had been considered under the</p> <p>12 Adults at Risk policy and assessed as risk level 2. He</p> <p>13 had no criminal history and was considered low risk so</p> <p>14 escorts were not planned for his removal.</p> <p>15 An assessment care and detention and teamwork, ACDT,</p> <p>16 document was opened on 21 June which is at <HOM002388>,</p> <p>17 which says that D2054 had "stated that he wants to die".</p> <p>18 I'm quoting from the ACDT now:</p> <p>19 "... stated that he wanted to die after being given</p> <p>20 removal directions. When asked, he said he would not</p> <p>21 harm himself or try to take his own life. Low mood and</p> <p>22 crying uncontrollably."</p> <p>23 Within those ACDT notes, a member of staff,</p> <p>24 Ms Murray, has recorded that D2054 "told me that he was</p> <p>25 tortured in Nigeria and cannot return back to his home</p> <p style="text-align: center;">Page 142</p>	<p>1 separately to others. He said it was boiled potatoes</p> <p>2 that looked like they had been boiled in a chemical but</p> <p>3 he didn't have any choice but to eat. He told the PSU</p> <p>4 the food made him feel lazy and uncomfortable and he</p> <p>5 felt it had been poisoned, not to kill him but to make</p> <p>6 him removable to Nigeria. He goes on:</p> <p>7 "One hour later they came and told me that I will be</p> <p>8 flying to Nigeria in a few hours. I don't even know</p> <p>9 what happened to me. I got angry and started using</p> <p>10 shaving stick blade, stabbed myself three times on my</p> <p>11 arms, which I don't know why I did that."</p> <p>12 He says his room mate fetched help.</p> <p>13 D2054's medical notes that day show that one of</p> <p>14 the nurses who attended saw him bleeding, clearly upset</p> <p>15 and at times hyperventilating. His medical records show</p> <p>16 that one of his wounds required steri strips and</p> <p>17 dressing. He was moved to E wing for constant</p> <p>18 observations. He also told the PSU that when he was</p> <p>19 told about removal, he asked to see his solicitor and</p> <p>20 his sister visited him that day.</p> <p>21 His complaint goes on to say that a few hours later</p> <p>22 he was brought food and asked for his medication, but</p> <p>23 they didn't know about it. He said he had not been seen</p> <p>24 by healthcare and had requested paracetamol for</p> <p>25 a headache but hadn't been given any. He wrote:</p> <p style="text-align: center;">Page 144</p>

<p>1 "Then around 9 pm one of the security came in and 2 informed the one on my door that they are moving me to 3 Nigeria in a few hours. Then I started crying because 4 I'm still bleeding a bit and lost some blood already. 5 Then, around 11 pm, I saw a lot of security men, some 6 with video cameras recording what was going on. They 7 came to me that they are moving me to the airport. 8 I was trying to explain to them my condition. They 9 rushed me and I hit my head on the floor and I became 10 unconscious, then I started shouting 'Jesus'."</p> <p>11 He told the PSU during the later telephone interview 12 that he had been semi-conscious and six officers had 13 been on top of him holding his legs and arms. One had 14 handcuffed him causing him a lot of pain, and he said 15 one of the officers was covered in blood from D2054's 16 self-harm wounds.</p> <p>17 He said they then handcuffed him to one of 18 the officers and that he was still bleeding and had been 19 dressed in a long-sleeved T-shirt to hide the bleeding. 20 He said he was put in the van and that he told them he 21 had lost his memory and was promised that there would be 22 healthcare at the airport, but there was not, and he was 23 put on a plain to Nigeria with only one of the six 24 medications he required and with no healthcare 25 assistance.</p> <p style="text-align: center;">Page 145</p>	<p>1 conclusion will be considered during phase 2. 2 MR LIVINGSTON: Chair, thank you. 3 Reading in Evidence re D2953 4 Chair, I'm now going to read in evidence in relation 5 to D2953. He's another individual who has not given his 6 account of his experiences to the inquiry directly, but 7 following his detention and after making complaints 8 about his treatment, he was interviewed by 9 Rukshana Rafique of the Professional Standards Unit, the 10 PSU, on 18 October 2017. That's <HOM004880> and D2953 11 was also interviewed by Stephen Cotter of G4S on 12 6 November 2017, and that's at <CJS0073658>. Both 13 interviews were conducted via an interpreter. 14 Chair, in summary, on 15 February 2018, the 15 Professional Standards Unit concluded -- <CJS001506> at 16 pages 20 to 37, that: 17 (a) on 10 June 2017 "DCM Murphy hit him hard on the 18 left thigh, leaving a bruise". 19 (b) on 11 June 2017, "DCM Murphy punched him on the 20 chest/lower abdomen". 21 (c) on 16 June 2017, "DCM Murphy punched him on the 22 left side of his head". 23 Chair, various staff members were interviewed in 24 relation to these allegations -- this evidence, along 25 with other evidence relating to the investigations into</p> <p style="text-align: center;">Page 147</p>
<p>1 His email says he was at risk of bleeding while on 2 board and he says: 3 "I have been asking myself, where is the human 4 right? Instead, people are being treated like this. 5 Please, I will like the police to investigate on this 6 matter, it's very bad, there is CCTV around the 7 premises."</p> <p>8 Due to the nature and allegations of excessive force 9 and food tampering, the complaint was referred to 10 Sussex Police on 20 July 2017.</p> <p>11 On 11 August, the PSU conducted a telephone 12 interview with D2054 who was in Nigeria at the time. He 13 also provided photographs of his injuries. He suggested 14 his former roommate could provide his own account but he 15 had already left Brook House with no forwarding address. 16 The PSU considered his photographs, D2054's account, the 17 paperwork, accounts of Brook House staff and video 18 footage.</p> <p>19 On 15 September 2017, D2054 was informed by the PSU 20 that all of his complaints had been found to be 21 unsubstantiated. The PSU's findings were passed on to 22 Sussex Police who considered that report and filed the 23 incident with no further criminal investigation 24 required. This is at <SXP000018>. Other materials and 25 accounts considered by the PSU in reaching this</p> <p style="text-align: center;">Page 146</p>	<p>1 the complaints, will be addressed in phase 2. For now, 2 I'm going to concentrate on the account given by D2953. 3 In his interview with the PSU, D2953 started by 4 saying that he wanted compensation and that the first 5 time, 10 June, he was punched on the left thigh; the 6 second time was on 11 June, in the same part of 7 the centre, when he was punched on the abdomen and near 8 to the chest area; the third time was 16 June, when he 9 was punched on the left side of the head and face near 10 his left ear.</p> <p>11 Firstly, in relation to the first incident on 12 10 June, D2953 said in his interview with the PSU "he 13 was transferred during the night to Brook House 14 Immigration Removal Centre (IRC) by British Transport 15 Police. Between. 3.00 and 3.30 hours they left the 16 police station and arrived at Brook House IRC after 17 5 pm. He was feeling a bit stressed, the centre had an 18 appearance of a prison with big steel gates and guards. 19 He has not been in any such establishment/prison 20 before."</p> <p>21 D2953 said he was locked up in a room and started 22 kicking a plastic bucket because he was feeling 23 stressed.</p> <p>24 He said that he wanted to go for a walk, but was 25 told by a female guard it was not possible.</p> <p style="text-align: center;">Page 148</p>

<p>1 He then describes how he was transferred to what he</p> <p>2 described as "the awful wing", saying that</p> <p>3 Officer Derek, as he called him at the time, searched</p> <p>4 him before putting him in the room. He said that he did</p> <p>5 not resist on transfer, saying, "I have had two</p> <p>6 operations on my chest as well as a hernia operation.</p> <p>7 There is no way I would get physical and resist".</p> <p>8 Contemporaneous records show that D2953 was placed on</p> <p>9 E wing, with an entry recording this made by</p> <p>10 Derek Murphy in the evening of 9 June 2017.</p> <p>11 D2953 describes being on this wing as making him</p> <p>12 even more stressed "because there was nothing there; no</p> <p>13 TV, his phone was removed, there were no sockets to</p> <p>14 charge anything, he did not think there was even</p> <p>15 a toilet. There was no bedding, only a blanket and</p> <p>16 pillow."</p> <p>17 D2953 then gave a description of "Officer Derek",</p> <p>18 which both the PSU and G4S later concluded referred to</p> <p>19 Derek Murphy.</p> <p>20 D2953 said there was someone else present when Derek</p> <p>21 punched him on his left thigh, describing how "there was</p> <p>22 a young lad at the door, only Derek entered the room and</p> <p>23 hit me hard on the left thigh".</p> <p>24 When asked why he was hit, D2953 said, "Because</p> <p>25 I was banging the door and shouting; that doesn't give</p> <p style="text-align: center;">Page 149</p>	<p>1 account in which D2953 said he was hit by Derek with his</p> <p>2 right fist to his left leg and pointed to his outer</p> <p>3 thigh as the spot. He said that he was hit by Derek</p> <p>4 because "I was hitting the door, shouting and kicking at</p> <p>5 it". He said that a boy (young guard) saw it.</p> <p>6 In relation to the second incident, this is on</p> <p>7 11 June, D2953 said in his interview with the PSU that</p> <p>8 Derek punched him on the left side of his chest and the</p> <p>9 lower abdomen near the ribs.</p> <p>10 When asked why this happened, D2953 said:</p> <p>11 "Because I was banging on the door and windows; why</p> <p>12 else would he do it? You could ask him why he did it.</p> <p>13 I haven't hit him, he hit me, you should ask him."</p> <p>14 D2953 said he was banging on the door and window</p> <p>15 because he was fed up with being in that room behind the</p> <p>16 steel door.</p> <p>17 When asked how many times Derek hit him, he said,</p> <p>18 "He hit me once, and if he hit me any more times I don't</p> <p>19 think I would have made it; would have been alive".</p> <p>20 He says that he was sitting on his bed and Derek</p> <p>21 opened the door, entered and punched him. D2953 said,</p> <p>22 about Derek Murphy, "He said something, but it can't</p> <p>23 have been important. I can't remember what he said.</p> <p>24 The important thing is he hit me. He was telling me off</p> <p>25 because I was speaking against the police, saying they'</p> <p style="text-align: center;">Page 151</p>
<p>1 him the right. I was even more stressed having been</p> <p>2 transferred to that wing in those facilities; there was</p> <p>3 no TV". He said that he didn't remember if Derek said</p> <p>4 anything and said, "The important thing is, he hit me",</p> <p>5 and that he had hit him once with his right hand.</p> <p>6 D2953 said he got a bruise from the punch, but said</p> <p>7 "I did not receive any medical help. There was nobody</p> <p>8 else there; there were hardly any guards or staff on</p> <p>9 that wing".</p> <p>10 He also said that the young officer at the door</p> <p>11 "must have seen it because the door was open".</p> <p>12 D2953 said, "The way I was treated was just</p> <p>13 barbaric".</p> <p>14 In response to a question about whether he went to</p> <p>15 healthcare to ask them to take a picture of the bruise</p> <p>16 or anything, he said, "How can I ask for anything, after</p> <p>17 hitting me, he locked the door and left with the young</p> <p>18 lad. There was nobody else in sight to ask and seek</p> <p>19 help".</p> <p>20 When asked whether he had told anyone else, he said,</p> <p>21 "How could I tell anybody else; I was locked up in my</p> <p>22 room and could not even go near the window. There was</p> <p>23 nobody to talk to".</p> <p>24 During his interview with Stephen Cotter on</p> <p>25 6 November, the interview summary records a similar</p> <p style="text-align: center;">Page 150</p>	<p>1 were all corrupt because of some incident which happened</p> <p>2 in May".</p> <p>3 He added that "It wasn't as strong a hit as it was</p> <p>4 on my left thigh, but it was still very painful because</p> <p>5 I have had two operations on my chest".</p> <p>6 He thought it happened in the afternoon and that</p> <p>7 there was somebody else at the door who didn't come into</p> <p>8 the room.</p> <p>9 He also noted, "I was locked up in that room, I was</p> <p>10 banging on the door and windows. Nobody offered me any</p> <p>11 medication; any antidepressants. I hardly got any sleep</p> <p>12 whilst I was in there; one or two hours a day".</p> <p>13 In his interview with Stephen Cotter of G4S on</p> <p>14 6 November, D2953 gave a similar account saying that</p> <p>15 Derek came in and hit him because he was "shouting,</p> <p>16 pushing, kicking" and was stressed. He demonstrated to</p> <p>17 Mr Cotter that he was punched in the kidney area on his</p> <p>18 left side and said there was another officer with Derek.</p> <p>19 In relation to the third incident on 16 June, D2953</p> <p>20 said that this happened on a different part of the wing</p> <p>21 and was just before lunch.</p> <p>22 He said that he was punched on the head and ear and</p> <p>23 that this happened because "I told him I had human</p> <p>24 rights. He wanted to transfer me to another wing with</p> <p>25 two others. I told him I was a citizen and had human</p> <p style="text-align: center;">Page 152</p>

<p>1 rights. I can't sleep when there's one person around, 2 never mind two". He wanted his own room.</p> <p>3 In response to this, D2953 says that Derek "told me 4 to follow him to the staff room; when we got in, he 5 closed the door and hit me on the left side of the head. 6 There was another man there who was roughly about my age 7 who was wearing a white shirt and red tie". He noted 8 "the other person in the room was a manager, he was 9 a witness and I am guessing that, because of 10 the witness, he later came to apologise for what he did 11 and shook my hand". D2953 suggested that it might have 12 been because of having a witness there that Derek later 13 came and apologised and shook his hand, given that he'd 14 never had any apology from him the first or second time.</p> <p>15 He says that following the punch "I was aching for 16 a few days", and that it must have been his right -- 17 Derek's right hand which he used. D2953 recalled that 18 Derek "hit me between the jaw and the ear; where the 19 glasses frame would normally sit".</p> <p>20 Again, he said "I was not offered any medical help. 21 I went back to my room to watch TV and was not offered 22 any medical help".</p> <p>23 D2953 was asked by Stephen Cotter of G4S about 24 whether he had been punched or bitten, in light of 25 the other records, which did record the word "bitten".</p> <p style="text-align: center;">Page 153</p>	<p>1 a room and that he was treated badly.</p> <p>2 Of particular note, chair, on 16 June 2017 -- so 3 that's the day of the third incident -- D2953 said in 4 his final of seven calls to the helpline that day, and 5 this was the only call in which he had access to an 6 interpreter, "Guard hit me three times, the man was 7 aggressive to me and apologised after. After third time 8 he hit me, he sat on the bed next to me and was 9 explaining something". The operator asked if they 10 should call Brook House, to which D2953 said, "I don't 11 want to make things worse, but you can". The operator 12 did not phone Brook House.</p> <p>13 On 20 June, it's recorded that D2953 entered the 14 library at Brook House and asked to speak to the 15 manager, saying he had been bitten, as it's recorded, by 16 a staff member three times and wanted compensation.</p> <p>17 We also have a complaint document dated 18 23 June 2017 -- so that's seven days after the third 19 incident -- which is not referred to by either the PSU's 20 investigation or the G4S investigation conducted by 21 Stephen Cotter and which says:</p> <p>22 "I was beaten from an old (almost 60 years old) and 23 high (almost two metres) three times. The name to this 24 old man, from security staff to Brook House, is Eric, 25 maybe."</p> <p style="text-align: center;">Page 155</p>
<p>1 D2953 said "punched" and demonstrated being punched on 2 his leg, side and face.</p> <p>3 When asked whether a manager came to speak to him 4 about these incidents later in June and asked whether he 5 wanted to inform the police, he said that he didn't 6 remember this happening but it was possible.</p> <p>7 When asked about other officers, he said to the PSU, 8 "They were not all as bad as Derek. There were some 9 other guards, they seemed quite nice and they have never 10 lifted a hand; they were just like prison guards".</p> <p>11 Chair, Derek Murphy was interviewed by the PSU and 12 denied the allegations against him. However, as already 13 mentioned, the PSU concluded that the three allegations 14 of assault were substantiated.</p> <p>15 You will hear more about Derek Murphy's account and 16 the PSU investigation in phase 2.</p> <p>17 Chair, I will briefly summarise the evidence 18 relating to the complaints and other contemporaneous 19 evidence that was documented. As mentioned, the three 20 incidents which I have discussed happened on 10 June, 21 11 June and 16 June.</p> <p>22 In total, D2953 rang the Equalities Advisory Support 23 Service helpline on 40 occasions, between 10 June and 24 17 July 2017. These calls included general complaints 25 about his human rights, that he was having to share</p> <p style="text-align: center;">Page 154</p>	<p>1 D2953 then goes on in this complaint document to 2 describe the three times:</p> <p>3 "In left leg on 10 June in a locked room with steel 4 door room on ground floor Eden wing (I was to have 5 a blue areas to my left leg). 6 "In left side to my chest." 7 On 11 June: 8 "And in the left side to my head nearby to the left 9 ear. (Every shot to the head is very dangerous, 10 sometimes and for the life) on 16 June 2017 in the staff 11 room on Eden wing." 12 He says: 13 "Was another security staff near in this staff room, 14 this man was wacking this shot to my head." 15 At the end, it says: 16 "I want very big compensation." 17 That document also complains that he was not given 18 his medicines for nine days, including antidepressants 19 which helped him with terrible insomnia. That part of 20 his complaint, chair, in relation to the medicines, did 21 receive a response on 5 July 2017, saying that they 22 apologised for him not receiving some of his medication 23 for seven days but they had had to request his medical 24 records from his GP. That is at <CJS001616>. 25 On 29 June 2017, so that's 13 days after the third</p> <p style="text-align: center;">Page 156</p>

<p>1 incident, D2953 said in one of 11 calls he made that day</p> <p>2 to the Equalities Advisory Support Service helpline that</p> <p>3 he had been bit or hit three times. No interpreter was</p> <p>4 on this call.</p> <p>5 On the same day, 29 June, there was a recorded use</p> <p>6 of force against D2953. In his incident report,</p> <p>7 DCM Philip Page records that D2953 "kept repeating that</p> <p>8 he had been assaulted and he wanted compensation, he</p> <p>9 said the assault had happened on 16 June". That's at</p> <p>10 <CJS0073644>.</p> <p>11 In the report of injuries to detainee by</p> <p>12 Nurse Donna Batchelor that day, on 29 June, it was</p> <p>13 noted:</p> <p>14 "No new red marks, bruising, lacerations were noted.</p> <p>15 He does have multiple scarring from surgeries. [Query]</p> <p>16 injuries prior to today."</p> <p>17 Ms Batchelor also recorded in D2953's records on</p> <p>18 that day, in his medical records:</p> <p>19 "States has been punched and hit by officers; states</p> <p>20 hit around side of head, no bruising or red marks</p> <p>21 noted."</p> <p>22 That's <HOM032247> page 9. On 3 July 2017, it was</p> <p>23 noted again in his records "detainee has been disruptive</p> <p>24 since his arrival, he claims he was bitten by staff</p> <p>25 three times".</p> <p style="text-align: center;">Page 157</p>	<p>1 surname of this officer, she did not give it to me."</p> <p>2 D1747 said:</p> <p>3 "During this incident, there were a couple of other</p> <p>4 officers in the room and a few prisoners from the</p> <p>5 abovementioned detention facility. There are also two</p> <p>6 monitoring cameras. I reported this incident to the</p> <p>7 police too."</p> <p>8 He then identified three witnesses who the inquiry</p> <p>9 knows as D1771, D1686 and an officer called</p> <p>10 Kristian Brown.</p> <p>11 As part of a PSU investigation into his complaint,</p> <p>12 D1747 was interviewed on 26 July. A summary of that</p> <p>13 interview is at <HOM002521>.</p> <p>14 D1747 said that he was in healthcare to get his</p> <p>15 medication and, having taken it, he put his cup in the</p> <p>16 rubbish bin and moved away from the hatch to make space</p> <p>17 for the next person.</p> <p>18 When asked, D1747 said it was "a lie that he had his</p> <p>19 medication in his left hand and only pretended to take</p> <p>20 it", saying that he needed the medication, so why</p> <p>21 wouldn't he have taken it? He also said he did not hide</p> <p>22 his medicine.</p> <p>23 D1747 said that DCO Murphy may have thought he</p> <p>24 hadn't taken the pills, but he did and put the empty</p> <p>25 pill container and water cup in the rubbish bin.</p> <p style="text-align: center;">Page 159</p>
<p>1 Chair, as you heard briefly during the opening to</p> <p>2 this inquiry, and as you will hear more about in</p> <p>3 phase 2, several of these complaints were not passed on</p> <p>4 and none of these complaints regarding assaults were</p> <p>5 investigated at the time. It was not until at</p> <p>6 least September 2017, three months later, and after</p> <p>7 Panorama had been broadcast, that D2953's complaints</p> <p>8 about being punched three times by a member of staff</p> <p>9 began to be investigated by both G4S and the PSU.</p> <p>10 Chair, that concludes the evidence for D2953.</p> <p>11 Finally, for today, I'm going to read in evidence</p> <p>12 relating to D1747.</p> <p>13 Reading in Evidence re D1747</p> <p>14 MR LIVINGSTON: On 20 June 2017, D1747 made a complaint</p> <p>15 about an incident that had occurred that same day. That</p> <p>16 complaint is at <HOM002520> and is recorded as having</p> <p>17 been received on 22 June 2017.</p> <p>18 The complaint read:</p> <p>19 "On 20 June 2017, at 8.20, in the room where the</p> <p>20 medicines are being dispensed, got attacked by one of</p> <p>21 the officers. At first he started abusing me verbally</p> <p>22 in an obscene manner. When I pointed it out, he hit me</p> <p>23 twice with his fists in my chest. Whilst still abusing</p> <p>24 me verbally, he threw my ID card under my legs. When</p> <p>25 later on my wing I asked my manager Hailey for the</p> <p style="text-align: center;">Page 158</p>	<p>1 According to D1747, an officer, who we know to have</p> <p>2 been DCO Murphy, then came up to him and said, "What you</p> <p>3 doing, fucking idiot?". D1747 later said that</p> <p>4 DCO Murphy also said other "very bad" things and that he</p> <p>5 was very shocked that officers who worked in the</p> <p>6 detention centre could say such things.</p> <p>7 When asked during his interview, D1747 said that</p> <p>8 Derek Murphy did not ask him "not to be silly" but said</p> <p>9 "What are you doing, fucking idiot?"</p> <p>10 D1747 said that maybe DCO Murphy and he were quite</p> <p>11 close together, or maybe too close, but he didn't know.</p> <p>12 When asked to comment on the statement from another</p> <p>13 detainee, D71, that he went close to DCO Murphy, he</p> <p>14 didn't agree. He said, "Next time, I promise I smash</p> <p>15 this guy ... who touch me I smash as well ... but me</p> <p>16 I have to go to prison".</p> <p>17 He recalled that maybe another DCO held DCO Murphy</p> <p>18 but he wasn't sure.</p> <p>19 D1747 said that he held his hands behind his back</p> <p>20 and said, "Excuse me, what you say?".</p> <p>21 According to D1747, Derek Murphy then hit him in the</p> <p>22 chest with his fists, with both hands, to which he</p> <p>23 responded by saying, "What you doing?". He recalled,</p> <p>24 "The DCO hit him very hard, enough to make him take</p> <p>25 a few steps back but could not remember if the DCO</p> <p style="text-align: center;">Page 160</p>

<p>1 pulled his hands back to hit him or if it was with hand 2 or fist".</p> <p>3 D1747 says that Derek Murphy then tried to hit him 4 again, but D1747 pushed his hands down and another 5 detainee came between them.</p> <p>6 A second officer, DCO Brown, then took D1747 out of 7 the room and told him to relax, and Derek Murphy then 8 came and threw D1747's ID card at his feet, saying 9 something like, and this is according to D1747, "You 10 fucking idiot wanker". D1747 said he was not shouting 11 but was nervous as it was a stressful situation.</p> <p>12 D1747 says that he later called the police to report 13 this incident.</p> <p>14 He also said that he asked a female DCO wing manager 15 for the name of the DCO who had hit him, she said she 16 didn't know, but came back an hour later saying she had 17 his name.</p> <p>18 D1747 said he did not believe it possible that the 19 wing manager didn't remember DCO Murphy's name, and 20 thought it was because she wanted to speak to DCO Murphy 21 first.</p> <p>22 When he was told the name, at this point, D1747 says 23 that he said he didn't need it now as he was going to 24 complain and he had her name for the complaint. He did 25 not recall if he was angry and shouting when he got back</p> <p style="text-align: center;">Page 161</p>	<p>1 D1747 said that he wanted to continue with his 2 complaint because "does not want other detainees to 3 suffer".</p> <p>4 When asked, D1747 said he didn't know why his 5 version of events differed from the staff witnesses, but 6 thought it "a simple answer that they were all working 7 together and were taking care of each other".</p> <p>8 In relation to the two detained persons identified 9 by D1747 as witnesses, firstly, D1686 was approached by 10 two staff members to give a statement on 5 July. D1686 11 said he remembered the incident but declined to give 12 a statement. He said that if it went to court, he would 13 testify or talk to the police but would not give 14 a statement now. That's recorded at <HOM003493>.</p> <p>15 The second individual, D1771, was noted to have been 16 removed, and therefore no statement could be obtained 17 from him.</p> <p>18 Additionally, and as I have already referred to, on 19 6 July, a statement was provided on behalf of D71. He 20 was identified by a staff member, as opposed to D1747, 21 as having been present. That statement, at <HOM002419> 22 records that D71 witnessed an officer push D1747 as he 23 encroached into his personal space. The statement says: 24 "I don't believe the officer did anything wrong as 25 the detainee got in his face unnecessarily."</p> <p style="text-align: center;">Page 163</p>
<p>1 to the wing. He said that maybe he was speaking loudly 2 and fast because he was nervous, and accepted it was 3 "possible that the wing manager could have mistaken this 4 with him appearing to be angry".</p> <p>5 D1747 didn't complain to the wing manager at first 6 because he didn't think there was any point. Later, 7 another detainee told D1747 about the locked yellow box 8 and that complaints go straight to the Home Office, not 9 detention centre staff.</p> <p>10 D1747 is recorded as confirming that "he had no 11 injuries, was not hurt, did not go to healthcare and the 12 incident would not be mentioned on his health record".</p> <p>13 D1747 also recounts that when he saw DCO Murphy 14 later, DCO Murphy laughed in his face.</p> <p>15 Additionally, the day after the incident, D1747 says 16 that he saw DCO Murphy give a pack of tobacco to the 17 detainee who came between them.</p> <p>18 He says that, after a month, the police came and 19 talked to him, but, despite D1747 calling them several 20 times since, they have said nothing.</p> <p>21 This is what he said during his interview with the 22 PSU on 26 July 2017.</p> <p>23 In that interview, D1747 said that he didn't want 24 DCO Murphy to go to prison, but felt the detention 25 centre wasn't the right place for him to work.</p> <p style="text-align: center;">Page 162</p>	<p>1 At the bottom of the statement, it says: 2 "DCM D Brackenridge has written this information for 3 me at my request and is a true version of events."</p> <p>4 The statement is signed by D71 and witnessed by 5 DCM Brackenridge and another member of staff.</p> <p>6 It is not explained in the PSU's report why the PSU 7 investigator, Nick Adamson, asked for these statements 8 to be obtained by G4S staff rather than doing so 9 himself.</p> <p>10 When D1747 was asked why D71's statement agreed with 11 that of the staff, he said that he thought maybe the 12 detainee had problems as well but couldn't say what was 13 going on in other people's heads.</p> <p>14 We have a record of a Sussex Police log <SXP000055> 15 which records D1747 having phoned the police on the day 16 of the incident and saying that he was beaten up by an 17 officer and sworn at. It records that he was beaten on 18 his chest, fell on the ground, and the officer kept 19 beating him. The officer is recorded as being called 20 Derek. The police log records that D1747 was speaking 21 Polish and that a colleague interpreted and got the 22 details.</p> <p>23 The following day, 21 June, there is a record of 24 another phone call to the police during which D1747 says 25 that he wants the police to come that day, saying that</p> <p style="text-align: center;">Page 164</p>

<p>1 he thinks there were camera filming, he is worried it</p> <p>2 will be his word against the offender, that the officer</p> <p>3 keeps walking around and smiling at him, that the</p> <p>4 officer weighs 100 kg and he only weighs 60 kg and that</p> <p>5 the officer was hitting him very hard and could have</p> <p>6 killed him.</p> <p>7 There is a further entry on 25 June 2017 where an</p> <p>8 officer spoke with DCM Nick London, the security manager</p> <p>9 on the day, who told the police that D1747 tried to</p> <p>10 conceal meds, then became aggressive towards the officer</p> <p>11 and the officer used reasonable force and an open-hand</p> <p>12 palm push to move him away.</p> <p>13 It appears, chair, that, based on this, the matter</p> <p>14 was recorded by the police as no crime, and it was noted</p> <p>15 that it would not be investigated.</p> <p>16 However, there is a subsequent record that the</p> <p>17 police came to Brook House and viewed the CCTV footage</p> <p>18 on 6 July 2017, and that's at <HOM003492>.</p> <p>19 Chair, as I have already intimated, the PSU</p> <p>20 investigation also included an interview with</p> <p>21 DCO Derek Murphy, who denied the allegation of assault,</p> <p>22 and witness statements from others. As mentioned</p> <p>23 previously, you will hear more about their accounts and</p> <p>24 the PSU investigation in phase 2, but for present</p> <p>25 purposes, in summary, it can be noted that in the</p> <p style="text-align: center;">Page 165</p>	<p>1 THE CHAIR: Indeed. Thank you very much. See you at</p> <p>2 9.30 am tomorrow.</p> <p>3 (3.52 pm)</p> <p>4 (The hearing was adjourned to</p> <p>5 Friday, 10 December 2021 at 9.30 am)</p> <p>6</p> <p>7 I N D E X</p> <p>8</p> <p>9 MS ANNA MARIE PINCUS (affirmed)1</p> <p>10</p> <p>11 Examination by MR LIVINGSTON1</p> <p>12</p> <p>13 Reading in Evidence re D87131</p> <p>14</p> <p>15 Reading in Evidence re D2054141</p> <p>16</p> <p>17 Reading in Evidence re D2953147</p> <p>18</p> <p>19 Reading in Evidence re D1747158</p> <p>20</p> <p>21</p> <p>22</p> <p>23</p> <p>24</p> <p>25</p> <p style="text-align: center;">Page 167</p>
<p>1 report, which is at <HOM003522>, it was noted that the</p> <p>2 police visited D1747 and viewed CCTV and decided not to</p> <p>3 take any further action, concluding that DCO Murphy was</p> <p>4 not at fault and was within his rights to openly push</p> <p>5 D1747 away as he had entered DCO Murphy's space in an</p> <p>6 aggressive manner. The PSU investigation concluded on</p> <p>7 the basis of statements from other members of staff, one</p> <p>8 other detained person and the CCTV that the allegation</p> <p>9 by D1747 against DCO Murphy was unsubstantiated and that</p> <p>10 the use of force by DCO Murphy was justified.</p> <p>11 You will also hear, chair, in phase 2 evidence from</p> <p>12 Jon Collier, the use of force expert instructed by the</p> <p>13 inquiry, in relation to this incident.</p> <p>14 Chair, the inquiry does have CCTV footage of this</p> <p>15 incident, which has been retained and provided to</p> <p>16 Jon Collier, and can be played now. That's at disk 08</p> <p>17 and it is from 2.40 minutes, please.</p> <p>18 (Video played)</p> <p>19 MR LIVINGSTON: Chair, this is CCTV, so it will obviously be</p> <p>20 silent.</p> <p>21 It can be stopped there, thank you.</p> <p>22 Chair, that concludes the reading-in evidence in</p> <p>23 relation to D1747 and it concludes the evidence for</p> <p>24 today. I think, with your permission, we will sit again</p> <p>25 tomorrow morning at 9.30 am.</p> <p style="text-align: center;">Page 166</p>	

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