

Brook House Inquiry

Witness Statement of John Joseph Connolly

I provide this statement in response to a request under rule 9 of the inquiry rules 2006 dated 24th July 2021

John Joseph Connolly ,will say as follows

Background

1 (a) The dates are correct.

2 (a) I was primarily based at Tinsley House.

(b) depending on the staff levels in the activities department at Brook House, On average, i'd say about three day shifts per month.

(c) I would mainly work in the library, and at meal times provide lunch cover on the wings ,so as officers could have their lunch breaks.

3 (a) I think it was the local immigration, that stopped the tours, owing to the fact that those taking part were not cleared to work in the center.

(b) If you had just left university and this was your first real employment ,I think most right minded people would feel a bit uncomfortable in those surroundings. At the open day lots of staff would inform people as to the day to day job and during the initial training you would get some insight .However ,that first day in the center ,well nothing prepares you for that. Quite a few officers only lasted a couple of weeks.

(c) being in a classroom environment , in some ways prepares you for the jobs but to actually see your future environment and also speak and interact with real people is priceless. It was also helpful to have saved everyone's time

(4) I never instructed in MMPR

Provision of C&R instruction

I decided to become a C&R instructor early

John Connolly (1)

5 (a) I put a request into the management to apply for the position of a local C&R

instructor. I then attended one day assessment at HMP Kiddleington to see if I was suitable for the post. Prior to

the assessment I was given a powerpoint to present to the national instructors and also a lesson to instruct fellow candidates in front of the national instructors. The final part of the assessment was a knowledge test. If you failed any part of the assessment, then you would not progress to the next. At the end of the day you were given feedback and that you would be given a future date for your two week instructors course.

(b) I could only start teaching once I had attended and passed the two week instructors course.

(6) It states in the Employee Development Review: - "WHILE" training to be a C&R instructor he visits other establishments for additional advice of his own accord.

- (a) Before going on my two week instructors course at HMP Kiddleington, I arranged to sit in on a refresher class at HMP Lewis, West Sussex.
- (b) As there were no initial C&R courses being held at either Tinsley House or Brook House, I needed to see how instructors ran courses.
- (c) Not much, it was a new experience. By that I mean, not being a student but an instructor.
- (d) No, as I wasn't an instructor then.

(7) (a) Sorry about the dates, it was a long time ago. I reviewed use of force incidents, be they spontaneous or planned. This included CCTV footage and prior to the body cameras, handheld camera footage. All the reports and any footage, were filed and handed to the security department. I was also responsible for making sure all operational officers were up to date with their annual training.

(bi) yes.

(bii) As I understood it, the management wanted an ACDT coordinator, so my post was made redundant.

(biii) No.

John Connolly (2)

(c) The role of the C&R coordinator differs from that of other C&R instructors in that you read all the incident reports and any video footage from any incidents and report on them. If I needed a second opinion, then having other instructors to give their input was invaluable.

- (8) (a) Daniel small YES.
- (b) Charles Francis NO.
- (c) Nathan Ring YES.
- (d) Dave Webb NO.

It was so far back ,I can't really recall how they each performed,during their initial or further refresher training.

(9) (a) I can't recall the exact dates but a DCO by the name of David Flack failed his refresher and we recommend that he had another refresher two weeks in the future.I remember we were not very popular with the scheduling department,Flack worked in the families unit at Tinsley so they were one officer short.He was put on non contact duties in the visits reception at Tinsley House.He did manage to pass his refresher on the second occasion.

(b) The officer who had failed ,would be either put on reception at either Brook House or Tinsley.

(c) Never.

(10) (a) It was from the same manual,so both non and operational staff received the same personal protection training,I can't personally recall instructing anyone from the IMB.

(b) Personal protection training ,was a one off session ,on refreshers were given.

(c) It takes 2000 repetitions to gain muscle memory,that is practising a technique 2000 times ,so that it becomes a natural reaction. The students didn't have the time in one afternoon to gain such experience.

(d) being aware of your surroundings,i.e where the exit doors are stairs helps ,putting objects between yourself and someone gives you space and slows that person down.rather than trying to disarm someone .Having said that sometimes your left with no other choice other than to try and disarm the person.

John Connolly (3)

- (11) (a) I passed the Bronze commanders course In January 2009.
- (b) It was a nine day course,four day in the classroom and five day in a realistic environment.During the the five day training phase I was jointly in charge of twelve officers ,which was a fourteen person unit,We being trained to take back control of prison establishments or detention centers from prisoners or detainees.the units were drilled in various techniques .I am afraid I haven't got the syllabus.

(c) I stopped being a bronze commander around 2014/15.

(d) My EDR from november stated that i was responsible for the introduction of the BWC at both Tinsely & Brook

(12) (a) Yes, I agree with this statement.

(b) I had seen traffic wardens wearing body worn cameras and their use diffusing volatile situations.I did some research into the use of BWC's and thought they'd make things a bit easier and a lot more transparent ,where confrontational situations arose in the centers.

(c) I loaned a camera from a firm call reveal (can't remember the exact name) i also looked on West Sussex police website and the sequence that police officers used before switching their cameras .Informing the person they were about to switch on their camera etc.

(d) We tried the camera for a month, the first DCM to use it was DCM G.Parnell .The trial was a huge success ,so more were purchased. Healthcare also purchased cameras for their reception and medication areas ,as the healthcare staff were getting a lot of verbal abuse.

(e) The cameras were user friendly and were signed in and out from the security department.After a camera was signed back in, any footage was downloaded and stored.

(13) (a) I wouldn't say I was skilled ,more competent.

(b) CCTV, no knowledge whatsoever,I was never trained in the control room.

(c) Knowledge concerning the BWC's ,I picked it up by reading and using the camera.

John Connolly (4)

(14) (i) If you were heading to a incident you would switch the camera on and start recording ,even before you reached the incident.If however you were in a discussion with a person and you felt the situation need it ,you would say"I am now going to switch on my camera for your safety and mine.",the time now is and to-days date is I am in E wing and I am talking to detainee Smith.

(ii) The footage was downloaded by the security and only the security.

(iii) Deleting footage,not possible,not even the security department could delete footage,It simply didn't happen.

(iv) The camera operators' job was to record an incident ,and not to worry about what was happening around or behind them.

(15) I might have shown IMB footage but I honestly can't recall what incident(s) nor the IMB members involved.We had nothing to hide from the IMB,most of them were ex-prison officers.

(16) (a) Yes I did make a statement concerning the staffing levels at Brook House. .

(b) Yes ,my comments were made in relation to Brook House .

(c) No,the level of "spice " that was entering the establishment had fallen considerably, (d) During November and March officers were overwhelmed by the numbers of medical emergencies and first ,second responses.It did take its toll on the mental health of some officers ,to a point where staffing levels were very low.

(e) Even though staffing numbers were low,this did not impact how officers reacted to either spontaneous or planned interventions.

(17) (a) A planned removal or intervention in my opinion,should have had the duty director or a member of the SMT present.

(bi) Relocation of a person ,from a wing to the CSU'

(bii) Overseas escort/transfer to an HMP establishment.

Normally The duty DCM,Immigration,and If IMB were on site they would be invited to attend along with health care who would have three personnel present at any incident.

(18) (a) I have never made ,nor would I make such a comment.

(b) I did not,nor would I have used such a team towards a female member of staff.

John Connolly (5)

(19) (a) Tully alleges that I showed complete contempt and hatred towards the detainees on a number of occasions and authorised a strip search of a male detainee and that I also called the detainee a "cunt" and mocked him. How would it be possible for a DCO, To take officers from their wings ,without the knowledge of either the control or ,or more importantly without the Oscar 1,s permission?So I just walked onto a wing pick on a detainee and ordered officers to remove clothes from a detainees back,I don't think so.Were talking about article 3 and article 8 of the ECHR. I've always treated people fairly. A strip search is always carried out under controlled conditions and in private.As for calling a detainee a "cunt" in front of other officers,it did not happen.Let me explain the procedures:- to carry out a strip search ,the detainee must have been involed in a fight or some sorts ,or has self harmed or to have been found in possession of illegal

substances.Therefore that detainee would be relocated to the CSU.Before that could take place ,authorisation would have to have been granted by either the Duty Director

or the Oscar 1. Fresh clothing would be placed in the room prior to the search being carried out. The detainee would be given the opportunity to remove his own clothes but if they refused then force would be used. The duty Director would be present and also healthcare, a handheld camera would be held outside of the room with the lens cap on, so only sound would be recorded.

How would it be possible for three officers to take a detainee through the center then into the CSU, strip that detainee without the control room staff informing the Oscar 1. If there was an illegal strip search of a detainee, then where are the police reports/the complaint from the detainee? Where are the use of force reports because it would have been a use of force? Where is the camera footage of me allegedly calling the detainee a "cunt"? Again in my opinion, Tully has fabricated this statement, for his own ends.

(20) (a) I first met Ganga-Valle around 2011, when he transferred from Brook to Tinsley. In his Ganga-Valle stated that I would say "Bloody Day and you Bloody Spanish come here". This apparently was said in front of 30-40 people. The only gathering of that many people would have been during his initial training. I never took part in this initial training as I didn't qualify as an instructor until July 2009. There would have also been a number of other instructors present, yet none challenged that comment, I find that strange.

(b) As for calling a fellow officer "Gay", I wouldn't, nor would I have said such a thing.

John Connolly (6)

(21) (a) No.

(b) No, I definitely would not consider myself falling into that category. (c) No, each team was picked from staff that were available on that particular shift. Each removal would take six officers off shift for around three hours. We sometimes had officers from Tinsley House doing the removals. So no, we did not specifically pick officers according to the nationality of the person and as for having an all "female team" there would not have been sufficient female staff on duty during shifts.

(22) (i) Yes I did attend

(bi) I think it was due to the person refusing food or drink.

(bii) I was rostered to work on E wing that day, the DCM asked me to escort the party to the detainees room.

(biii) I stood outside and did not take part in the actual review.

(biv) As I said, I filled in on the wings if there was a staff shortage, so I had very limited

knowledge of the detainees on the wings.

(bv) No .

(bvi) No, I didn't receive training but training would have been beneficial. Case reviews were either done by DCM'S or DCO'S who were specially trained.

(23) (a) When the position of C&R Coordinator was made redundant .The reviews were conducted by a DCM who was also a C&R instructor. (I was not a DCM, so I would not have taken part in reviews)

(b) One was footage shown on the BBC panorama programme.

© Nil.

(d) As no force was used ,no reports were submitted .

(e) I'd report that incident.

John Connolly (7)

(24) (a) No, I definitely was not suggesting that the use of force was ,or should have been used in relation to breaches of the center rules,using the term "Frowned upon" may have been too strong a phrase to have used. The number of times that force was used over a year ,did in my opinion reflect badly on the center.

(b) Officers felt that they would be suspended if the incident that they were involved in were to have been investigated. Officers were very hesitant to volunteer to take part in planned or spontaneous use of force.

(c) "Turning a blind Eye" No officer that I worked with ever broke the Centre Rules. However some did turn a blind eye. One of the duties of a wing officer was to control entry to the wing ,by standing next to the wing door. This was to ensure that only detainees that resided on that wing were granted access. The detainees had to produce their ID card to gain entry. Imagine, it's your fourth 12 hours day shift , on the other side of the door there is a large group of detainees kicking and banging on the door to gain entry. The detainees would be very intimidating and "in your face" and more often than not trying to and in most cases succeeding in pushing past the officer. Smoking on the landing was also prohibited but again for a " quiet life " some officer let this practice slip, if they did try to exert any form of authority they would be met with hostility ,so at the end of the day a "blind eye was turned " I could go on but I think you get the picture.

(d) Assault by a detainee on another detainee
Serious damage to centre property.

Assault on a member of staff (this would include anyone who worked in or visited the centre)

Refusal the transfer from the centre (i.e transfer back to an HMP establishment or an overseas flight)

Self Harm

(25) (a) 2013 - 2016

(b) A use of force report would have been submitted by the individual or team and any relevant hand held or body worn footage.

© I would read the use of force reports and view any footage, I would submit my find to the security manager.

(d) Had the officers involved exhausted all avenues open to them at the time ,talking to the detainee ,finding out what the issues were ,how they could resolve the issues in a peaceful way.Had they explained the consequences of non- compliance to the detainee.If force was the last resort,Could they then, Justify using force.Was the level of force no more than necessary,was the force used proportionate to the seriousness of the circumstances .

John Connolly (8)

(26) (a) Yes I am referring to Ben Saunders.

(b) How could a director comment on an officer using force on a detainee,if they had not practiced or used the techniques themselves? I knew Ben was an instructor using PCC (Physical control in care) on young persons at YOI Medway.The Law would have been the same but the techniques were vastly different.

(c) Yes,the C&R package was offered to Ben on several occasions during that period but the offer declined.

(d) Again Ben had a sound knowledge of the law surrounding the use of force but not the techniques employed to restraining an adult .If Ben had taken a course then there would have been no issues from the officers on his comments regarding use of force investigations .

(e) Operational staff might have had more respect for the director if he'd taken the course.Ben was trained in personal protection training physical control in care, at YOI Medway . This enabled him to venture onto the wings but his visits were very rare.Officers felt very abandoned,and let down.

(27) (a) I can't recall specific incidents or dates but some health care nurses did tell officers to move their positions when they were involved in incidents .Yes I can recall one incident, it was a Tascor in country team transfer to another establishment ,and one of our healthcare nurses did intervene as the detainee was becoming very stressed and anxious .I think in the end the moved was canceled.

(28) (a) I've read the use of force report (CJS005641) having read the report, the officers used force to gain control of the detainee, the detainee was offering little resistance, so the officers deescalated the incident very quickly, by releasing holds of the detainees head and letting him stand upright, they further deescalated the incident by the use of guiding holds. Once the detainee was relocated in the holding room. all holds were released.

(29) (a) I honestly can't remember this incident.

(b) What use of force? From the transcript, it seems officers are getting ready for an incident. In all my years as a Use of Force Instructor, I've never heard such tosh from an officer (Tully). "people dying during restraint". Never has an officer made such a comment. I think Tully made that comment only because he was wearing a recording device and the comment was made for effect.

(c) As I've already said, I can't remember the incident, and without seeing the Use of Force reports and any relevant footage I can not comment.

John Connolly (9)

30 (a) V2017051700009(CLIP I) This is the clip, where Tully was bleating again about having to be part of a C&R team. He's also discussing why the detainee is on the netting.

(b) V2017051700018(CLIP I) you can mostly hear Tully, offering his opinion on how best to restrain the detainee. My statement "christmas time" It was just a saying of mine, in that if a detainee initiated the use of force before an officer did (assault the officer first) that the officers could continue with the restraint without first trying to de-escalate the situation.

(c) V2017051700019(CLIP I) Jack Bannister (DCM & C&R instructor) talking to kitted officers and the Nationals leading a detainee out into the court yard. It appears that the detainee is suffering the effects of paver spray.

(31) (a) No I did not use racist language let me explain, once the team were close to the wing door all non essential communication stopped. The other side of the door contained a landing full of detainees and for that reason the team needed to be quiet. We were also waiting for the door to be opened. Prior to waiting at the wing door, the team had spent around three hours sitting on the stairs talking. we talked about a variety of subjects and told stories it was a private conversation, or so three members of the team thought, We talked about old C&R incidents and what occurred. At the time I thought nothing of it but Tully kept touching his watch, that action in itself was innocent enough, but prior to moving to the stairs when the team were "kitting up" it was standard practice to remove all jewelry, this included watches. I should have reminded Tully to remove his watch but thought as he was an activities officer he was probably monitoring his heart rate.

(32) (a) I probably did use derogatory language, in that I called the detainee an idiot, because in my opinion he was acting like one. I would not consider this to be racist language.

(b) I refute the accusation that I would have drag him down the stairs face first. Point one the nationals would have been there, plus a senior

manager. Second, dragging someone face down is not in the C&R manual, so no that would not have happened. Thirdly, the whole incident would have been recorded.

© Yes, I along with a team have strip searched a non-compliant but never as a method of control or punishment.

(d) I have never used unreasonable, unnecessary or unjustified force against a detainee.

John Connolly (10)

(33) (a) No, I did not make these statements, let me explain: The term "Boss" was never used at either Brook Or Tinsley by any member of staff. The only people to use this term were the detainees, when talking to a staff member, even the director was called by his first name. All those officers in the footage were trained to work in the control room. So why would a trained control officer point out a camera that he views all day long?

(b) Technical skills? There wasn't anyone at Brook House, including myself, who had the technical capability to delete CCTV or BodyWorn Camera Footage. The CCTV worked on a 31 day cycle and on the 31st day the system started erasing day one. That's why all incidents were downloaded and stored on a CD disk. To delete BWC footage you had to contact the makers of the system to ask their permission.

(c) As I've already stated, it's not possible.

(d) No, I do not recall DCO Small pointing at the camera. Again, DCO Small did not call me Boss. DCO Small stated in one interview CJS004056_0004-0008 that he didn't point at the camera and then in another interview stated that he did. Was he pressured to change his mind? I wonder.

(34) (a) I might have referred to him as an Idiot, as he probably was acting like one. The policy at that time concerning detainees going onto the netting, was as follows: -officers were **not** allowed to follow a detainee onto the netting, nor use any type of force to get them off the netting. So, why would I say to the [Small/In relevant] "we are just going to go in and twist his arm. Just get him and walk him off. "bend him over". I never said that

(b) Again, I would never condone the use of unauthorised techniques. The whole team

would have been seen by the detainees and other offices.

- (c) Kencocv1019 v2017051700018, Having viewed the footage, it also showed the Sensitive/irrelevant present. At no time did I say “just go in and twist his arm” and I was certainly never asked why I wanted to bend the detainee’s arm. The Sensitive/irrelevant also offered his opinion on how to restrain the detainee.

- (35) (a) Can’t recall that conversation.
(b) Can’t recall that conversation.
(c) Can’t recall that conversation.

John Connolly (11)

(36) If you listen to the footage again, I say” and remember scream lock-on lads because the Nationals are watching”. Not as you stated “and remember screen lock on lads because the nationals are watching” The term “lock-on” is given by the arm officers, when they have gained control of the detainee The No1 of the team needs to hear this response from the arm officers.

(37) There was nothing sinister in that comment. I’ve always said that if a detainee grabbed hold of you it was a present, in that it made it easier to gain control of the detainee, as they had initiated the incident

- (38) (a) That was completely fabricated, I was just telling “tall stories” to pass the time while we were in the stairwell. Three hours plus is a long time to spend sitting doing nothing.
(b) Happy days is just a saying that I use all the time, nothing sinister in that phrase whatsoever.
(c) During the insurrection at Brook House The officers belonging to Brook House, were used as admin. As Brook House was the establishment requiring help, then no officer (d) at Brook House was allowed to take part in the actual intervention to take back the wing.

I was in the command suite with the centre Director/Deputy Director and the prison service. We were employed manning the control room, manning the main gate house and escorting in-coming prison service Tornado units. Again, No G4S officers belonging to Brook House took part in the actual intervention. We knew the time of the intervention, the number of officers involved but not the tactics that were to be employed by the Prison Service.

- (39) (a) No I did not state that 35 officers tried to handcuff the ringleader at the same time, how could 35 officers try and handcuff one person?
(b) I was called in from home for that incident by Ian Danksin, the then deputy Director. As the incident was after lock down we used all available officers from Brook and Tinsley. I briefed the whole team and once the whole team were in position. I opened the door to the exercise yard and asked the detainee if they were going to leave the yard peacefully, the

detainee declined the officer. I then marched the team onto the yard. Again I asked the detainee to leave the yard. This time the detainees were willing to leave the yard. One at a time the detainees were instructed to walk to the wall, one at a time and face the wall. A three officer team then approached the detainee and the detainee was instructed to place their hands behind their back. Ratchet handcuffs were applied to the detainee and they were lead to the CSU. This whole incident was captured on the CCTV and Handheld cameras, also 16 use of force reports were submitted. One from myself and 15 from the teams that applied handcuffs. The deputy Director reviewed the incident and letters of commendation were given out.

John Connolly (12)

(40) (a) Yes.

(b) I spoke to my supervisor and showed the letter to him. I then met with Ben Saunders who informed me of my suspension.

(c) Yes.

(41) (a) Yes.

(b) Yes.

(c) Bad language, nothing more, no force was used by myself or by any member of the team.

(d) I don't understand the question.

(e) I did attend a formal interview with Ben Saunders 7th of September.

(42) (a) Having watched the BBC Programme, I knew I would have been sacked, as I felt I'd been stitched up.

(b) I knew there would be some sort of investertion .

(c) I knew I'd be "thrown under the bus" so I jumped before I was pushed.

(d) They said that I couldn't resign , as therey was an investigation pending .

(43) (a) Yes.

(b) I think G4S and particularly Ben Saunders had already made their decision prior to the hearing taking place. Nothing I say was taken into account. Oh and it was Joe Marshall who sat in with at the hearing , Not as stated in the letter Andy Lyden.

(c) On the original BBC programme Aired in September 2017 , The one Ben Saunders invited me to watch in his office, the subtitles appeared when we were in the lift outside of the directors(28:42) office. However on the may 2020 version the subtitles appear when we're in the stairwell with no one in sight. Was this footage changed to back up tully's and Small's witness statements? I would like to view the original programme. This was the clip that Ben Saunders showed me at my hearing. (d) I was not involved in any investigation , apart from the hearing with Ben Saunders.

(44) (a) I should clarify that I was suspended , so in my mind I was not working. Once I'd seen the programme I knew I'd be "thrown under the bus" so I jumped before I was pushed.

- (45) (a) Yes
(b) No

John Connolly (13)

(46) I agree in part with the findings, in that I may have been slightly unprofessional, Negligent never. I never used racist language in front of detainees and certainly never ever encouraged others to do so.

The footage of myself using the word “nigger” was in my opinion dubbed. I’ll explain why, The alleged incident occurred outside of the lift in the secure corridor. This lift is directly opposite the directors office, the door to that office is always open and is 2 metres away from the lift. I wear hearing aids in both ears and as a consequence I tend to shout. Tully was the No1 of the team, he asked me outside of the lift “John if he kicks off should I take his head. It’s makes no sense what’s so ever for me to have reply “just say listen here nigger”. I would have said yes if he get non-compliant, take control of his head.

KENCOV1019 Transcript Wednesday 17th May 2017 147. This is where the alleged foul language occurred. Look at the clip of me allegedly saying “listen here nigger “. At no point can you see my lip. This in my opinion was dubbed for dramatic effect. Both Small and Tully stated that this happened in the stairwell. Well, did it happen in the lift or the stairwell?. CJS004056-000-0008:- SN (Sarah Newland) posed a question to DS”so you don’t recall him (John Connolly) using the term when he was in the stairwell. DS replies :I don’t remember No. As i’ve already stated, it was only detainees that called officers “Boss”.

appear when we’re in the stairwell with no one in sight. Was this footage changed, so On the original BBC programme Aired in September 2017, the subtitles appeared when we were in the lift outside of the directors(28:42) office. However on the may 2020 version the subtitles to back up Tully’s and Small’s witness statements? I would like to view the original programme. This was the clip that Ben Saunders showed during my hearing. On the BBC panorama programme, Tully stated “I am glad we didn’t get the chance to attack [D275]” No detainee was ever attacked by any officer, How dare Tully blacken good officers' repetitions by a cheap shot .

I believe that the facts stated in this witness statement are true. I understand that proceedings for contempt of court may be brought against anyone who makes, or causes to be made, a false statement in a document verified by a statement of truth without an honest belief in its truth

Signature

John Connolly (14)

