

## **Brook House Inquiry**

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First Witness statement of IOANNIS PASCALI

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I, **Ioannis Paschali**, state the following which I am writing in response to the Rule 9 request for a witness statement, received from the Brook House Inquiry:

### **Background**

1. My name is Ioannis Paschali. My date of birth is already known to the Inquiry, and I am not including it in my statement as I do wish it to become public information.
2. I have no professional qualifications and have never held a professional job. Prior to joining G4S, I worked as a Prison Officer.
3. I worked at G4S from 2016 to 2017 as a Detainee Custody Officer.
4. I left G4S because I found a better job. I left because I could not handle the stress of working there. It has affected my mental health.

### **Application process**

5. I was attracted to the position of Detainee Custody Office at Brook House as I needed a job and I felt it would be easier than the Prison Service. I felt my skills were transferrable. I felt the turnaround of Detainees would be quicker, but the reality was that Brook House is a long-term holding prison for Detainees which brings with it worse problems than a Prison.
6. I cannot remember the recruitment process and I cannot explain any detail of it.

### **Culture**

7. Brook House was a horrible place to work. I do not remember a particular culture. The environment was hostile, aggressive and violent. Staff and Detainees used bad language. If this is what you mean by culture, that is what it was.

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8. I cannot remember what staff morale was like between 1 April 2017 and 31 August 2017. I do not believe I was there for all of that time. For me personally, my morale was low to the point that I left.
9. I do not recall individual attitudes towards Detainees whilst I worked at Brook House. Officers got on with the job. Looking at the footage, attitudes towards Detainees was often distasteful. The attitude of Detainees towards Officers was often distasteful. When humans are faced with constant awful conditions, it wears them down.
10. In relation to my concerns regarding how the values of G4S or its culture impacted on the general protection of those detained at Brook House I would comment that G4S and all the staff at Brook House are not trained to deal with those with mental health issues. They do not have the expertise or the skills to help mentally impaired people. Anyone with mental health issues should not be detained at Brook House or any other establishment; they should be sent to a centre that is fully equipped to help them such as a mental health hospital.
11. In relation to my concerns regarding how the values of G4S or its culture impacted on the management of staff I would say that G4S used the same staff repeatedly for C&R. There were not enough staff to cover for breaks, not enough time for report writing, staff were expected to squeeze report writing in whilst on the wing performing other duties. It was challenging and wrong. There was not a proper procedure for handing in report forms which would then go missing and staff were accused of not completing their paperwork. Managers and Senior Managers were not visible on the wing. They were operationally trained and should have been involved in more operational duties.
12. In relation to concerns surrounding the protection of especially vulnerable detainees I would say that there was no protection for vulnerable people with mental health issues as Brook House is the wrong place for them to be. All Officers were trained to do was restrain people when they became violent or aggressive, or committed acts of self-harm and that was the scope of the training. They should have been sent to a mental health institute where they could receive appropriate treatment. Brook House provided no treatment. It was obvious to me that by incarcerating such individuals, the Home Office were making their issues worse.
13. I do not recall having any problems with the senior management, management or leadership at Brook House. I did not have much interaction with senior managers during a working day as they were rarely visible on the wing. I do not have any understanding of the management values and priorities.

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14. I was never aware of any issues being raised about the treatment of detained persons. I was only at Brook House for a short period of time. I had already left G4S by the time the Panorama program aired so I do not know the reactions from DCOs, DCMs and senior managers.

**Physical layout of Brook House**

15. I do not ever recall a Detainee complaining about the layout of Brook House the establishment. I have looked at the map at Document Reference CJS004587 and do not have any comment to make on the layout.
16. With regards to improvements at Brook House I would say that as Detainees are not allowed to leave the establishment, they only have access to what is available. They have not committed a crime; they are not prisoners so they should have access to things which everyone else does normally. So, there should be a cinema, swimming pool, a gym, a library, access to shops on site and good restaurants such as McDonalds, KFC and Nandos.
17. I would say that E wing was used to put Detainees and prisoners who were violent and abusive. It was also used as a holding area for Detainees who were due to leave Brook House.
18. Individuals would be moved there if they were violent and abusive. They would have attacked a Detainee, member of staff or themselves. They would also be ordered to be placed on E Wing by a Manager, sometimes when they had not committed any acts of violence, aggression or self-harm. This instruction would come from the Home Office as far as I am aware.
19. Whilst on E wing they would be allowed out of their rooms during the day, play chess with staff, go on the yard outside and play football, have showers, watch TV; unless they were not allowed out of their room because they were deemed too dangerous to themselves or others. These decisions would be taken by senior management.
20. From what I recall there was no real difference for Detainees on E Wing, than any other wing, other than they were not permitted to mix with Detainees from the rest of the establishment, nor could they move around the centre freely. It became very boring for them very quickly, which led to frustration.
21. I cannot recall in detail what criteria needed to be satisfied in order for Detainees to be moved to E Wing, but I believe that a manager or Senior Manager would need to make the decision.

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## **Policies and Procedures**

- 22. I cannot recall with any detail the policies and procedures for Brook House. They may have been drawn to my attention during training, but I cannot say for certain.
- 23. I cannot remember using the policies, but I would have followed the rules of the establishment.
- 24. I cannot remember needing to refer to the policies. I remember that the rules were to unlock at a certain time, lock up at a certain time, carry out counts, if someone was violent and aggressive, they needed to be restrained, if we were told by Managers that we needed to get into riot kit for a planned intervention, we would do that. These are the kind of rules that I remember and which I followed. As an Officer I was to do what I was told by a higher rank.
- 25. I do not know if policies were properly maintained and updated as this would be a senior management issue.

## **Training**

- 26. Usually, DCO recruits undertake an eight-week initial training course when starting at Brook House. I do not remember details of when I attended the training. I know I attended some training and I believe that G4S would have records of all my training. I do not recall ever receiving mental health training on how to deal with a mentally unwell Detainee.
- 27. I cannot remember if the training was adequate since I do not remember any detail of it.
- 28. I know staff had refresher training, but I do not remember any detail.
- 29. I do not recall the role of Activities Officer and I know nothing about it.

## **Personal protection training**

- 30. I have no memory of attending a personal protection course when I joined G4S, or if there was one offered. There may well have been one. It may have been included within the Control & Restraint training which I do recall attending.
- 31. I do not have any observations on the content or delivery of the personal protection training. If there was a problem, I believe I would have said something at the time.

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32. I do recall having use of force training, but I do not remember dates. I believe G4S would have records of this as it is a legal requirement.
33. I do not remember having any particular opinion regarding the quality of the Use of Force training either regarding its content or delivery. If there was a problem, I would have raised this at the time.

#### **The role of a DCO and relationships with Detained Persons**

34. The general duties included in the DCO job description set out in document CJS004294 are true of the role. What the job description does not reflect is that the environment is highly aggressive and volatile. Daily staff must deal with violence, threats, abuse and self-harm. Detainees are threatening and violent towards each other and towards staff and it is constant throughout the day. It is a high-pressured environment which affects everyone who works there or is detained there. There is no mention of the amount of self-harm or suicide attempts that an Officer would be expected to deal with. There is no mention of the mental health issues an Officer would encounter or experience themselves whilst working at Brook House.
35. I cannot remember specific interactions with detained persons, but I would have done the best I could at the time, with the tools I had at my disposal. Interpreters were available if needed but it was often easier to use other Detainees to assist in interpreting for me as interpretation services were usually carried out over the phone.
36. I do not remember any incentives to encourage positive behavior by detained persons. I do think incentives are a good idea.
37. My understanding of the DCO role during the ACDT process during the Relevant Period was that if I saw someone hurting themselves, I would stop them or if someone told me they were upset or feeling depressed I would write it down. I am not a doctor; I am not a nurse, and I am not a psychiatrist. The ACDT document does nothing to help Detainees. It is merely a document where staff write down what they observe. There is no medication, no counselling, no therapy. If anything, having an Officer following a Detainee around with an ACDT document, probably makes a Detainee's mental health worse.
38. The process, from what I can remember, for preventing drugs entering Brook House is that staff would be searched on arrival. I was searched and I had no problem with this. I cannot comment on whether the processes were successful as I had nothing to do with it. You would need to speak to senior management or staff who were tasked to deal with it.
39. I did not work as one of the welfare team nor was I part of the security team.

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**Relationships with staff**

40. I was not aware of any racist attitudes or behaviours. I am not English myself and am sensitive to such matters. Racist people generally do not make racist comments around people who are not of the same race as them.
41. I was not aware of any homophobic or misogynistic attitudes or behaviours that I can remember.
42. I do not remember any staff bringing drugs into Brook House. Any staff members bringing in drugs to Brook House would only make problems worse for themselves. Detainees taking drugs are far harder to manage than Detainees who do not take drugs.
43. I do not remember experiencing any bullying.
44. I do not remember any staff being bullied.

**Relationship with the Home Office**

45. I did not work with any Home Office staff.

**Relationship with Senior Managers**

46. I had no problem with any senior managers at Brook House. On E Wing, Senior Managers visited once per day. Other than the daily visit to E Wing, they were not visible at all. On other wings, Senior Managers did not visit at all. Senior Manager visibility and availability was poor.
47. I think it would be beneficial for Senior Managers to be based on the wings or to spend a considerable part of their day on the wings. If they were based there, they would be able to give instant approval for applications from Detainees for things such as property, or give permission for loves ones to send things in.
48. Anything that a Detainee wants, needs to be applied for and approved by a Senior Manager. The delay in getting applications approved, adds to Detainee's frustrations and the process itself is laborious and lengthy. That additional frustration and uncertainty leads to violence, aggression and restraints.
49. The quality of Senior Managers at Brook House is probably very good, and I expect they are highly trained individuals. However, even the most experienced or highly skilled Senior Manager, cannot manage what they cannot see. In my opinion, Senior Managers

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did not come onto the wings because it was not a nice place to be. I think they were scared.

### **Relationship with DCMs**

- 50. I do not remember having problems with any of the DCMs and I think they were all pretty good. I do not remember who my direct line manager was neither do I remember any appraisal meetings.
- 51. I believe the quality of management by DCMs was good. To get value out of a DCM, I believe they should be placed on one wing and be solely responsible for that wing. I do not think they have the capacity to be Oscar 1 or Oscar 2 at the same time. They seemed to have an unfair workload which Senior Managers may be able to help with.

### **Relationship with other DCOs**

- 52. I had good relationships with my colleagues from what I can remember. I was not friends with anyone at Brook House and I did not socialise with anyone outside of Brook House.
- 53. Some DCOs avoided the control and restraint element of the role and I found this unfair. The same staff were always used. This was something I raised often but nothing ever changed.

### **Relationship with Healthcare Staff**

- 54. I remember the Healthcare Team being present in the establishment, but I do not remember working with them other than them attending incidents.
- 55. I remember the Healthcare Team being present at use of force incidents but I do not remember any detail so I cannot comment of the effectiveness of them.
- 56. I do not recall having any communication with the Healthcare Team about any detained person with ongoing medical needs.
- 57. I do not remember the attitude of the Healthcare Team.

### **Disciplinary and Grievance processes**

- 58. I was never involved in any disciplinary investigations in any way shape or form, either for myself or as a witness.
- 59. I was never involved in any grievance investigations in any way shape or form either for myself or as a witness.

### **Staffing Levels**

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60. From what I can remember, there were always staff shortages at Brook House. Low staffing levels were the catalyst for many issues with Detainees asking for things, or asking to do things, that we were not able to facilitate because staffing levels were too low. Staff shortages adds to frustration for both staff and Detainees. It was the root of all evil.
61. Being short staffed meant that staff who were working were tired, over worked, stressed and depressed. There was not enough time to do the job properly. Staff hated coming into work.
62. With not enough staff on the wing, Detainees should not have been unlocked as there was not enough staff to manage them. This creates a huge risk for staff and Detainees.
63. As an example, I found a Detainee by the name of Dx hanging in the showers. He had self-ligated around his neck and was hanging unconscious. By myself, I had to lift him up, hold his weight and cut the ligature from his neck. I carried him to the landing floor on E Wing and called for help using the radio. Ideally, I should not have been on my own. When Healthcare staff and a manager did arrive, whilst watching Healthcare attempt to resuscitate Dx I was tapped on the shoulder by a manager who asked me to go and put my kit on to deal with a barricade incident on C Wing. My reply was "Are you fucking serious?" I did not go to the incident, I remained to assist with the first incident, and I wanted to check that Dx was ok. It is problems like this that arise with staff shortages.
64. I do not remember the staffing levels of the Healthcare Team. I do not remember anything about the staffing levels of the Healthcare Team.
65. I do not remember the staffing levels of the Activities Team and I do not remember such a Team.

#### **Tinsley House Staff**

66. I do not remember having worked at Tinsley House and nor do I remember working with staff from Tinsley House, so I am unable to answer the question.

#### **Treatment of Detained Persons**

67. I do not remember having worked in Reception and am therefore unable to comment on the process by which detainees arrive and leave the centre.
68. I do remember the induction process and as far as I can recall, it was followed. Unfortunately, I do not remember specific details.

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### **Activities for Individuals**

69. I had nothing to do with the activities program and therefore I cannot comment in any way shape or form as to whether the number of activities available were sufficient to keep individuals engaged/occupied.
70. I often played chess with Detainees on the wing, or I would play football with Detainees on the yard if they asked me and they appreciated this. There was not enough footballs or chess boards for everyone to get involved. From what I can remember, more equipment would be useful to help Detainees have some variety as to activities and get involved. Detainees often asked for football/cricket/basketball/rounders tournaments to be organised, but this was ignored. In my opinion this would have helped with Detainee and staff morale and provided a positive sense of community.

### **Immigration Rule 35 process**

71. My involvement of the Rule 35 process was as a DCO dealing with Detainees on both Rule 35 and Rule 40.
72. If I recall correctly, a detained person would be reviewed by the DCM and a Senior Manager. A detained person under Rule 35 would be seen at least once per day by a DCM and a Senior Manager. I am not aware of a detained person being refused any appointments in any way shape or form.
73. In my opinion, the process did not move swiftly at all. No staff were mentally health trained and there was nothing provided for or catered for, to help improve the mental health of Detainees that I can remember. They would often be left in Rule 35 conditions for lengthy periods of time which in my opinion, made their mental health worse with further acts of self-harm, violence, aggression and attempted suicide. The only training staff were provided with was to restrain individuals when they behaved in this way. It is a vicious cycle which also affected the mental health of staff, including myself.

### **Use of Force**

74. I most certainly would have been involved in use of force incidents involving control & restraint techniques, because I worked on E Wing. I cannot remember who was involved, the outcomes or changes made (if any) for these incidents. It was over 4 years ago, and I left many years ago.
75. I was used many times for use of force incidents, either being ordered by management or often called upon by other members of staff to help. I did not feel comfortable about being used all the time for use of force and I complained about this to Managers and Senior

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Managers. The reality of it is that other staff would not come forward to do use of force because they feared getting hurt and they did not want to do it. For the Senior Managers and DCMs, I understand their predicament; the pool of resources was very limited. This is not fair and leads to staff becoming desensitised to acts of self-harm, suicide and extreme violence. This is a procedural error, in my opinion. Use of force should be limited to one occasion per day, at most, in order to share the burden of such a demand on a member of staff.

76. I was not aware of reviews or lessons learned. It seems to me that these would be beneficial, but I do not believe the staffing levels during my employment would have allowed for these things to happen.
77. I do not remember being concerned about any incidents that I was or was not involved in. I was never a Manager at Brook House.
78. I feel that control and restraint is a good technique when used correctly. If Detainees are not being violent, I do not feel it should be used. For example, a Detainee that needs to be moved to another wing but is not being violent or aggressive, should not be restrained. I do feel that the orders given to restrain individuals were not always needed and I fail to understand why someone who is not being violent or aggressive or is not committing an act of self-harm; would need an Officer to put hands on them (use force).
79. I do not feel the use of control and restraint was used excessively at Brook House in relation to individual incidents, but I believe it was directed unnecessarily. It seemed to be the 'go-to' order given by Senior Managers which DCO's then had to follow.
80. I am not aware of any alternatives to using control & restraint other than lengthy negotiations which would sometimes involve buying pizzas or fish and chips for Detainees. I feel that is a good alternative as no one got hurt.

#### **Individual welfare**

81. I do not recall any training relating to the welfare of those detained at Brook House but G4S would have full details of all the training I received. I do not believe I ever received any kind of mental health training. I also did not receive any mental health guidance for myself after witnessing hangings and self-harm by way of serious cuts to detained men's bodies to which I still have nightmares about to this day.
82. I do not remember detail of managing the mental health of Detainees in general. I had no mental health training, and I did not feel equipped to deal with the issues which presented themselves whilst working at Brook House.

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83. I do not remember details of managing the mental health of Detainees involved with the Healthcare Team. The Healthcare Team did provide assistance to Detainees, but I cannot remember any detail of this. They came to check Detainees, but this seemed to be more of a physical check. I do not believe there was any counselling for Detainees or any help to deal with mental health issues. I never witnessed any lengthy conversations taking place in the form of counselling.
84. I worked at Brook House a long time ago. I do recall a problem with drugs being used by Detainees, but I cannot remember the detail. If I had seen anything personally, I would have reported it at the time. The use of drugs was rife, and this had a detrimental effect on Detainees causing violence, depression, acts of self-harm and arguments over drug debts.
85. The use of drugs at Brook House had a huge impact on staff. It presented more problems for them to deal with, in order to manage violence, depression, acts of self-harm and arguments over drug debts. I do not know what the policies or procedures were for preventing drugs getting into the establishment, but they clearly were not working. Everyone who worked at Brook House knew there was a drug problem. Everyone.
86. I do not recall any drug rehabilitation support at Brook House.
87. My understanding of the role of Chaplaincy is that they provided religious services for Christians, Muslims and other religions. They would come to speak to Detainees daily and provide them comfort and support which I feel was a good idea. No one from the Chaplaincy team ever raised an issue with me regarding the welfare of Detainees.
88. I do not remember detail of the processes or the policies in place when an individual self-harmed as I worked at Brook House a very long time ago. However, the policies processes and practices must have been successful to a point whilst I was working there; from what I can remember, not one Detainee successfully ended his life or seriously injured himself or endangered his life to the point he needed hospital treatment. However, this is all that the policies achieved; they did not address the problem. Nothing was done to improve the mental health of Detainees. I would like to add that whilst no one ended their life at Brook House whilst I worked there; there is no help for Detainees to assist them in coping or managing their mental health issues.
89. I cannot remember dealing with food refusals personally. I do believe there was a form that Officers completed to say whether Detainees had refused food, where they ticked if the Detainee had collected their meal. I know they occurred, but I do not remember being involved in managing them, nor do I remember the policy or process for dealing with them.

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### **Detained Persons as time served foreign national offenders (TSFNOs)**

- 90. I did not work on Reception for TSFNO individuals detained at Brook House, and I am therefore unable to comment regarding this.
- 91. I know that TSFNOs were at Brook House. I did not treat them any differently.
- 92. I do believe that the colocation of TSFNOs with other detained persons caused significant issues within Brook House. The ex-prisoners would bully and attack the other Detainees. This was unfair and I believe the staff did the best they could to manage this, with the limited resources available.

### **Abuse of individuals detained at Brook House**

- 93. I worked at Brook House a very long time ago, but I do not recall having any concerns of abuse or mistreatment of Detainees, by staff towards Detainees. If there was, I would have reported it at the time using an incident report form.
- 94. The comments I have made above, of the hundreds of hours of footage that was secretly recorded, without any members of staff knowing; there is absolutely no evidence to show anyone punching, kicking, cutting, abusing, smashing, breaking bones or beating detained men, or detained men needing treatment for such acts. I feel this question is unfair; it simply did not happen. I have explained my involvement in the incident on 25<sup>th</sup> April 2017. I did not witness any abuse and if it was happening, it would have been recorded. There is evidence of staff talking in private areas using distasteful language and letting off steam in order to cope with the environment that was Brook House.
- 95. Staff are also human beings. Everyone has their breaking point. Not everyone will appreciate the language used by staff, but it is how they coped working in the environment, it was accepted language in what was a toxic environment, and it was not challenged.
- 96. There is evidence of staff mocking and swearing at Detainees, but the difficult environment must be taken into account. I refer you to DL0000120.pdf which is a letter from C Pickering, Senior Prosecutor of the Crown Prosecution Service which states, "This is a difficult environment for all concerned. It is equally clear from the footage that some of the Detainees are violent and volatile, attacking both each other and staff. The context of this behaviour is that Brook House can be an unpredictable place to work with self-harm and suicide attempts being rife. It is a toxic atmosphere that can erupt into violence in seconds".

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97. Detainees abusing each other happened all the time. I did not have any concerns as it was everyday life. This was the norm. If I witnessed it, I dealt with it and would intervene.

### **Complaints**

98. I do not recall the complaints process as I left over 4 years ago but I would imagine that if a Detainee had a complaint relating to mistreatment by staff the Detainee would complain to any member of staff in person (not involved in the complaint), a custodial manager, a senior manager, to a member of chaplaincy, to the Healthcare Staff, to a member of the IMB or they could write a letter to complain, or they could tell their solicitor to complain as they are all provided with one. If they felt their life was in danger, they could dial 999. There were complaint forms available on all wings and these were accessible to Detainees. They would be able to complain in some way shape or form. I cannot recall any detail of the exact process.

99. I do not recall the complaints process as I left over 4 years ago but I would imagine that if a Detainee had a complaint relating to mistreatment by other detainees then the Detainee would complain to any member of staff in person, a custodial manager, a senior manager, to a member of chaplaincy, to the Healthcare Staff, to a member of the IMB or they could write a letter to complain, or they could tell their solicitor to complain as they are all provided with one. If they felt their life was in danger, they could dial 999. There were complaint forms available on all wings and these were accessible to Detainees. They would be able to complain in some way shape or form. I cannot recall any detail of the exact process.

100. Detainees often complained about everyday issues. I do not recall a complaint being made to me about abuse or violence from staff.

101. I was not involved in any investigation or complaint process. I never had a complaint made against me in the entire time I worked at Brook House.

102. In relation to the Panorama programme, the BBC and the undercover reporter who was making a financial gain and was looking to forge a new career in journalism, edited the footage to make me appear like a monster.

103. In the entire time I worked at Brook House, as I have stated, I never had a complaint or an investigation against me. The Inquiry has jumped to the conclusion that I manipulated and controlled every member of staff and Detainee at Brook House and have assumed that this is why there are no complaints against me. If I *was* the monster I have been made out to be, there would have been multiple complaints made against me.

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104. I was not involved in any investigation against any member of staff at Brook House.
105. I have no opinion on the complaint process as I have never been involved in an investigation at G4S.
106. I do not recall the complaints process as I left over 4 years ago but I would imagine that if a Detainee had a complaint relating to any other matters including healthcare then the Detainee would complain to any member of staff in person (not involved in the complaint), a custodial manager, a senior manager, to a member of chaplaincy, to the Healthcare Staff, to a member of the IMB or they could write a letter to complain, or they could tell their solicitor to complain as they are all provided with one. If they felt their life was in danger, they could dial 999. There were complaint forms available on all wings and these were accessible to Detainees. They would be able to complain in some way shape or form. I cannot recall any detail of the exact process.

### **The Panorama programme**

107. I did work with Callum Tulley, but I do not remember details.
108. I appear in the Panorama programme. My name is Yan. I would also like to point out that there are no tattoos on the side of my head, or any part of my body whatsoever. In his statement to the Police, Detainee D1527 described the person who was rude to him, as having a tattoo on the side of his head.
109. I have no opinion on the impact of the programme as I left many months before 4<sup>th</sup> September 2017.
110. I have no opinion on the detained persons becoming aware of the programme because I left many months before 4<sup>th</sup> September 2017. I would like to point out that it was only *after* the programme aired that a complaint was made against me.
111. As far as I am aware, I never worked with anyone who was underage. If I became aware of a Detainee who was underage, I would have reported it immediately to a DCM and a Senior Manager.
112. I do not know if there were any changes at Brook House following the programme as I left many months before 4<sup>th</sup> September 2017.
113. I worked at Brook House many years ago. Following the Panorma programme a number of individuals were either investigated, disciplined or dismissed. I know I must have worked with some of those people, but I cannot remember any detail. I, along with other

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staff, used distasteful language in what was a very difficult working environment. I never witnessed abuse of Detainees in all the time I worked at Brook House.

114. I worked at Brook House many years ago. I do not remember any incidents where staff used derogatory language or racist remarks. No one ever made racist comments in front of me; I did not witness this. There is some language in the Panorama programme that the Inquiry may deem to be derogatory. To me, many of the comments are distasteful or silly but staff are exposed to many difficult situations over and over and when you become desensitized, silly comments are made.
115. I do not believe that the language used by staff impacted on the care of individuals detained at Brook House.
116. I worked at Brook House a long time ago, but I do not remember witnessing any physical abuse.

### **Suggestions of improvement**

117. I think that Detainees should be allowed to leave the establishment during the day and come and go, to return in the evening. We should provide them with a daily allowance and a travel card so they can go on day trips, see family members and buy themselves things. They should be able to access their own bank accounts, have all their own belongings including mobile phones and laptops. Detainees should be provided with a facility that includes accommodation which enables their friends and family to visit for long periods of time. They should have access to shops, or shops on site that sell anything a free person can buy. Detainees should not have their liberty taken away from them as they have not committed a crime. Ultimately, there should not be any detention centres.
118. From everything you have sent me, not from my personal experience; clearly security is an issue at Brook House, as Callum Tulley was able to bring in prohibited items daily, for a number of months. This would ordinarily be punishable by a prison sentence for anyone else. At least one Detainee was able to bring in recording equipment to Brook House. I would therefore assume there must be a massive problem with security at Brook House if individuals can enter and leave the establishment, with whatever they want, on their person. Notwithstanding the massive drug problem at Brook House, security is clearly an issue.
119. Everybody who worked at Brook House at the time has full knowledge about the matters I have mentioned in my statement.

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120. I feel you should speak to the people who work or who are detained in Brook House at this moment in time to see what changes need to be made; not someone who left over 4 years ago, who has very little memory of their time in Brook House. I feel this is where the most improvements can be made.

121. The issues raised have been brought up time and time again. I do not feel that improvements will be made. I feel the purpose of the Inquiry is to vilify staff and is 'trial by media'. If you really want to make a difference, you should consider staff welfare as well as Detainee welfare. They are both equally important.

122. I have been interviewed by Sussex Police in relation to the panorama footage and the Inquiry has access to the transcript of the interview. I agree to it being disclosed to the Inquiry for use in evidence.

123. On 13<sup>th</sup> January 2022, the Inquiry Team edited my original statement and stated the following: "The Inquiry has reviewed the statement and formatted it into the narrative style that it has requested. The changes are made in 'tracked changes' within the document so that Mr Paschali can clearly see what additions are suggested in order to incorporate the question within the answer. I have reviewed those changes to the best of my ability.

I do not give permission for any part of this signed statement to be altered in any way, regardless of whether it fits the Inquiry's format, or not.

Statement 17/1/22

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 of its truth.

**Name: Ioannis Paschali**

**Signature:**

Signature

**DATE**

Witness name: Ioannis Paschali

Statement no: 1



Witness name: Ioannis Paschali

Statement no: 1