

<p>1 Wednesday, 23 February 2022</p> <p>2 (10.00 am)</p> <p>3 THE CHAIR: Good morning, Ms Luh. I understand that we are</p> <p>4 hearing from you first, on behalf of D1473. Thank you.</p> <p>5 MS LUH: D1473's evidence to the inquiry ...</p> <p>6 (Microphone not working)</p> <p>7 THE CHAIR: It is rather quiet.</p> <p>8 MS LUH: Should I move it closer?</p> <p>9 THE CHAIR: Let's just pause momentarily and see if we can</p> <p>10 sort that out.</p> <p>11 (Technical problem)</p> <p>12 THE CHAIR: We can hear you. Thank you very much. Please</p> <p>13 carry on.</p> <p>14 Statement of D1473 (read)</p> <p>15 MS LUH: If I can just start again. D1473's witness</p> <p>16 statement to the inquiry is dated 26 January 2022. It</p> <p>17 is at &lt;BHM000039&gt;:</p> <p>18 "I was detained in Brook House from 19 August to</p> <p>19 29 September 2017 for a total of 41 days. The</p> <p>20 experience of detention was very difficult for me,</p> <p>21 especially my time at Brook House. I still find it</p> <p>22 painful to try and remember some aspects. I suffer from</p> <p>23 mental health symptoms related to my past history of</p> <p>24 trauma, which was made worse by detention. Since being</p> <p>25 released from detention, I have been diagnosed with</p> <p>Page 1</p>	<p>1 was on ACDT and was given antidepressants and received</p> <p>2 very limited mental health support, was not seen by</p> <p>3 a psychiatrist, despite reassurances that he would be.</p> <p>4 He attempted suicide by using a belt around his neck.</p> <p>5 He was put in segregation as a result. An ACDT had been</p> <p>6 previously opened because of ongoing thoughts of</p> <p>7 self-harm and suicide [&lt;HOM029928_0012&gt;]. He was placed</p> <p>8 back on ACDT after his attempted suicide.</p> <p>9 "On 14 August 2017, D1473 saw a doctor for an</p> <p>10 assessment and report on his mistreatment in Nigeria.</p> <p>11 This was a month after he'd been detained. This led to</p> <p>12 a rule 35(3) report in which the GP expressed concerns</p> <p>13 that D1473 may be a victim of torture and suffered</p> <p>14 symptoms of depression and trauma which worsened in</p> <p>15 detention due to provoking factors such as hearing the</p> <p>16 keys, sounds of doors and transport in van.</p> <p>17 "The Home Office accepted the rule 35(3) report</p> <p>18 showed that D1473 was an Adult at Risk level 3.</p> <p>19 However, detention was maintained because the</p> <p>20 Home Office considered D1473 could be removed within two</p> <p>21 to three weeks. D1473 said this was not in accordance</p> <p>22 with the Home Office policy.</p> <p>23 "On 16 August 2017, my solicitors, Thompson &amp; Co,</p> <p>24 confirmed to me that they had sent fresh representations</p> <p>25 to the Home Office about my family life in the UK,</p> <p>Page 3</p>
<p>1 moderate PTSD. I have some problems remembering certain</p> <p>2 events that happened and when. I can also sometimes</p> <p>3 become too distressed to continue to speak or reflect on</p> <p>4 my experiences in detention.</p> <p>5 "I am still taking medication for my PTSD and</p> <p>6 depression symptoms. I am receiving calls every couple</p> <p>7 of weeks from a secondary mental health care team in the</p> <p>8 community who ask me how I am. I was having counselling</p> <p>9 but this stopped during the pandemic. I am hoping it</p> <p>10 will restart.</p> <p>11 "My background.</p> <p>12 "D1473 is a Nigerian national and suffered serious</p> <p>13 violence there. He explains his immigration history in</p> <p>14 the UK, his conviction, and his first period of</p> <p>15 immigration detention at the Verne IRC (from</p> <p>16 22 August 2014 to 24 February 2015) during which his</p> <p>17 mental health started to deteriorate. He struggled to</p> <p>18 be separated from his partner and his British daughter.</p> <p>19 Although he initially succeeded in his appeal against</p> <p>20 deportation and asylum refusal, this outcome was</p> <p>21 subsequently overturned.</p> <p>22 "My second period of detention.</p> <p>23 "D1473 was re-detained on 13 July 2017. He was at</p> <p>24 first held at the Verne IRC before transferring to</p> <p>25 Brook House. At the Verne, he became mentally unwell,</p> <p>Page 2</p>	<p>1 including my new partner and baby."</p> <p>2 D1473 understood this meant he could not be removed</p> <p>3 until those representations were determined, but</p> <p>4 detention was nevertheless maintained.</p> <p>5 D1473 transferred to Brook House on 19 August 2017,</p> <p>6 which he recalls was with little notice:</p> <p>7 "My detention at Brook House.</p> <p>8 "I arrived at Brook House late at night. I felt</p> <p>9 really tired and confused as to where I was. I remember</p> <p>10 being seen by a nurse at some point in the early hours</p> <p>11 of the morning. This appointment took place at around</p> <p>12 12.30 am, on 20 August 2017 [&lt;HOM029928_0014&gt;].</p> <p>13 "The nurse asked me some general questions about my</p> <p>14 health and history. I do not remember what was</p> <p>15 discussed at this appointment. However, I have now seen</p> <p>16 the nurse's entry in the records which state I was on</p> <p>17 ACDT and had a depressive disorder and appeared mentally</p> <p>18 low in mood [&lt;HOM029928_0014&gt;]. There is no record of</p> <p>19 me being asked about my history of torture or rule 35</p> <p>20 report."</p> <p>21 The following is a summary of paragraphs 28 to 29.</p> <p>22 D1473 explains that he did not have an induction at</p> <p>23 Brook House and was taken straight to E wing. He was</p> <p>24 placed on constant watch, having arrived at Brook House</p> <p>25 on an open ACDT. He notes that this was notified to the</p> <p>Page 4</p>

<p>1 Home Office via IS91 RA Part C. &lt;HOM025617_0008&gt;:</p> <p>2 "I found being in Brook House to be a real shock.</p> <p>3 Its setup and operation was much more like an ordinary</p> <p>4 prison than the Verne. At the Verne, although we were</p> <p>5 in cells, the cells were not locked and you had a key to</p> <p>6 your own cell. The landing was locked at night but you</p> <p>7 could still leave your cell to go to the toilet.</p> <p>8 The Verne was still detention and made me feel really</p> <p>9 depressed, as explained earlier. However, compared to</p> <p>10 Brook House, it did not feel nearly as oppressive.</p> <p>11 E wing was next to what was called 'the block', that is</p> <p>12 CSU, which was used to segregate detainees. My</p> <p>13 understanding of what E wing was for developed during my</p> <p>14 time at Brook House. I came to understand that it was</p> <p>15 for people like me who were being monitored because of</p> <p>16 a risk of self-harm. It was also where they put people</p> <p>17 who were obviously very seriously mentally unwell.</p> <p>18 People were also put in E wing when they were coming</p> <p>19 down from spice or if they were generally behaving</p> <p>20 badly.</p> <p>21 "Some of the people there were very ill and did not</p> <p>22 make any sense when they spoke. I could not understand</p> <p>23 why people who were so ill were being detained there."</p> <p>24 Records note that observations about D1473 were</p> <p>25 reduced to every three hours after several days. D1473</p> <p style="text-align: center;">Page 5</p>	<p>1 appointment. I don't understand these entries, as I had</p> <p>2 agreed to see a mental health nurse on that day and</p> <p>3 don't think I would have refused further support.</p> <p>4 "The entry also refers to my attendance and an ACDT</p> <p>5 review that day. I note it states, 'He becomes very</p> <p>6 afraid whenever he is behind locked doors. He does not</p> <p>7 want to be there' [&lt;HOM029928_0018&gt;]. I remember trying</p> <p>8 to explain to staff about how unwell I felt on E wing.</p> <p>9 However, nothing was done in response. I was not, in</p> <p>10 fact, reviewed by a member of the mental health team</p> <p>11 until a week into my detention at Brook House. From the</p> <p>12 medical records I have now seen, it does not appear that</p> <p>13 I had my first GP appointment until 24 August 2017,</p> <p>14 after my attempted removal."</p> <p>15 The following is a summary of paragraphs 36 to 40.</p> <p>16 D1473 describes requesting to move from E wing, but this</p> <p>17 was refused at first. He was eventually moved from</p> <p>18 E wing to B wing on 25 August 2017 after his unlawful</p> <p>19 attempted removal. He was in a room alone due to his</p> <p>20 mental health.</p> <p>21 D1473 describes that there were very few things to</p> <p>22 do at Brook House and no organised activities. Whilst</p> <p>23 he could speak English, he saw other detainees</p> <p>24 struggling to communicate or understand what was</p> <p>25 happening:</p> <p style="text-align: center;">Page 7</p>
<p>1 does not recall officers or healthcare staff regularly</p> <p>2 speaking to him or asking how he was on E wing:</p> <p>3 "I found my time in E wing really difficult. When</p> <p>4 I first arrived, I felt like I was just being monitored</p> <p>5 and watched on self-harm measures and that no-one</p> <p>6 actually cared about me. I felt trapped on the wing.</p> <p>7 We were locked in overnight from about 8.00 pm to the</p> <p>8 morning and could only go out onto the E wing during the</p> <p>9 day, although we were locked in for an hour or so for</p> <p>10 roll count.</p> <p>11 "I found being locked in the room very stressful and</p> <p>12 scary. Every time the door locked behind, I felt really</p> <p>13 claustrophobic and I could not escape my bad thoughts</p> <p>14 and memories of my past mistreatment. I started to feel</p> <p>15 less like myself, less like a human at all. I started</p> <p>16 to have bad dreams and more intrusive thoughts about</p> <p>17 what had happened to me in Nigeria. Both of my rooms in</p> <p>18 E wing were small, with an unscreened toilet in them,</p> <p>19 and because the staff could look through the observation</p> <p>20 panel in the door, it felt like I had no privacy and</p> <p>21 added to my feeling of claustrophobia.</p> <p>22 I felt increasingly depressed and anxious about my</p> <p>23 situation whilst at Brook House. The medical records</p> <p>24 indicate that, on 20 August 2017, I declined to see</p> <p>25 a mental health nurse and I did not attend a GP</p> <p style="text-align: center;">Page 6</p>	<p>1 "I thought the atmosphere in Brook House was</p> <p>2 oppressive. It did not seem that the officers cared</p> <p>3 about the detainees. I remember one incident on B wing</p> <p>4 at the servery when someone complained about the food</p> <p>5 and a woman working there said, 'If you want to stay in</p> <p>6 this country, you have to take what you're given'.</p> <p>7 I heard another officer, who said he used to be in the</p> <p>8 military, tell a detainee, 'I used to kill people like</p> <p>9 you for fun'. I took that to mean he was talking about</p> <p>10 killing black people, as the man the officer was</p> <p>11 addressing his comment to was African. This kind of</p> <p>12 attitude and language was common. Officers would even</p> <p>13 say that they didn't care when you asked them for help.</p> <p>14 "I tried to keep to myself and keep out of harm's</p> <p>15 way. I felt like staff at Brook House wanted</p> <p>16 deliberately to put you down, to kill your spirit,</p> <p>17 because then you feel less of yourself, less human, and</p> <p>18 you are less likely to speak up or resist.</p> <p>19 "When I was at the Verne, there was a board that had</p> <p>20 information about how to complain and useful numbers on</p> <p>21 it. However, at Brook House, there didn't seem to be</p> <p>22 any information about how to complain. I didn't see</p> <p>23 there was any complaints procedure I could use. I would</p> <p>24 verbally complain to staff. For example, I complained</p> <p>25 to a nurse about my treatment when the Home Office tried</p> <p style="text-align: center;">Page 8</p>

<p>1 to remove me. But they didn't take that forward, or  2 suggest how I could do that myself. I think the  3 atmosphere in Brook House was so oppressive that people  4 didn't feel they had the power to complain anyway and  5 were scared to do so."</p> <p>6 The following is a summary of paragraphs 44 to 47.  7 D1473 explains that he didn't see a member of IMB at  8 Brook House but regularly did at the Verne. He says  9 that there was no explanation of what support groups  10 were available. D1473 explains that, on one occasion,  11 an officer recorded he'd already eaten when he hadn't,  12 so he didn't get a meal. No action was taken against  13 that officer, despite him being told that the officer  14 would be disciplined. This made him feel hopeless.</p> <p>15 He describes receiving only limited mental health  16 care comprising intermittent support sessions with  17 a nurse:</p> <p>18 "I felt that healthcare at Brook House was really on  19 the side of the detention centre, rather than being  20 focused on looking after vulnerable detainees such as  21 myself. Healthcare never sent a rule 35 report to the  22 Home Office about my situation, despite knowing that  23 I am a victim of torture and was suffering from serious  24 mental health problems [&lt;HOM029928_0021]. There were  25 a lot of drugs in Brook House. They were much more</p> <p style="text-align: center;">Page 9</p>	<p>1 leave them as it was a drugs reaction and assumed staff  2 knew that it would pass. As far as I was aware, there  3 wasn't any rehabilitative programmes or support for drug  4 users at Brook House.</p> <p>5 "The unlawful attempt to remove me on  6 23 and 24 August 2017.</p> <p>7 "Although I had been given some documents saying  8 I could be removed from the UK, I hadn't been given  9 a specific date and didn't think this could happen until  10 my representations had been dealt with. I was told by  11 staff at Brook House they contacted the Home Office and  12 they had received my outstanding representations. I was  13 not worried, as I wouldn't be removed. It was therefore  14 a shocking and terrifying experience for me when the  15 Home Office tried to remove me to Nigeria."</p> <p>16 The inquiry already has a full statement of D1473's  17 experiences, dated 20 November 2017:</p> <p>18 "I think it is important, though, to set out the key  19 features of what happened to me here. But I hope that  20 whatever I don't mention here is not taken as not being  21 important or affecting me in particular. I have been  22 asked various questions by the inquiry about this  23 attempted removal and use of force but I still haven't  24 received disclosure of the CCTV footage of the removal.  25 I have been asking for that footage since 2017, when</p> <p style="text-align: center;">Page 11</p>
<p>1 available than in the Verne. The drug most commonly  2 used was spice. You would see people quite often in  3 a very bad way, hallucinating or screaming and banging  4 their heads. Occasionally, when someone overdosed on  5 spice, they would disappear and we would never see them  6 again. I took spice a couple of times in Brook House.  7 I was given it by people in the exercise yard. I did  8 this just to try and make myself feel better as my time  9 at Brook House was so difficult.</p> <p>10 "However, it didn't help and I didn't use spice  11 again, nor did I try any other drugs after these times.</p> <p>12 "I think there were multiple ways to get spice or  13 other drugs into Brook House. I understood that people  14 on the outside would fly the drugs into the outside area  15 using a drone or to a helicopter. I also heard rumours  16 that staff would facilitate detainees getting drugs by  17 taking drugs from visitors who would bring it into  18 Brook House and then the officer would pass the drugs on  19 to the detainee.</p> <p>20 "I didn't report drug use to staff because it was so  21 obvious that staff knew. When someone was being really  22 disruptive on drugs, staff would call healthcare. But  23 when people were calm but clearly high or stoned, staff  24 would just walk past and ignore them. I remember  25 someone fitting, seizing, and staff telling detainees to</p> <p style="text-align: center;">Page 10</p>	<p>1 I made my complaint to the Home Office, but still  2 haven't seen it.</p> <p>3 "I had been aware that day, from other people at  4 Brook House, that there was going to be a charter flight  5 to Nigeria on 23 August 2017, but because of what I was  6 told by my solicitors and the manager at Brook House,  7 I was therefore not worried about being affected by this  8 charter flight.</p> <p>9 "Throughout the day on 23 August, people were told  10 that they would be on the charter flight and people were  11 being moved around as a result. No-one came to speak to  12 me about this, which made me feel more assured.</p> <p>13 "Then, in the early evening, around 6.10 pm,  14 a manager at Brook House came and told me that I would  15 be on the flight. I explained I shouldn't be on the  16 flight because the Home Office had yet to consider my  17 further representations for leave to remain. The  18 manager told me to go get a copy of the application form  19 from my room and then speak to the Home Office officials  20 in reception. I was shocked and frightened about what  21 was going to happen to me.</p> <p>22 "I remember that an officer then escorted me to my  23 room in E wing to collect my papers. I returned to  24 reception to wait to speak to the Home Office officials.  25 Whilst I was waiting, I noticed that several bags had</p> <p style="text-align: center;">Page 12</p>

<p>1 been put behind me containing my belongings. This</p> <p>2 happened so quickly and I was upset and embarrassed that</p> <p>3 someone had packed my personal things without my</p> <p>4 knowledge. I didn't know who to trust. I knew that my</p> <p>5 immigration solicitors wouldn't be able to help me</p> <p>6 because their offices were closed. I just carried on</p> <p>7 waiting to speak to a Home Office official to explain</p> <p>8 again that I should not be removed. I never got the</p> <p>9 chance to do that.</p> <p>10 The next thing that happened was two officers came</p> <p>11 to find me. They seemed to be security guards of some</p> <p>12 kind, though I now know they were Tascor escort officers</p> <p>13 contracted by the Home Office. I told them I was</p> <p>14 waiting to see a Home Office official and that</p> <p>15 I shouldn't be put on a plane that evening to Nigeria.</p> <p>16 They didn't listen and just gave me instructions on</p> <p>17 signing some forms. I complied. I didn't resist, even</p> <p>18 though I didn't want to be removed, and didn't think it</p> <p>19 was right that I was being forcibly removed when the</p> <p>20 Home Office had yet to make a decision on my</p> <p>21 representations.</p> <p>22 "Despite this, I was put in a waist restraint belt</p> <p>23 by the two officers. This was most painful and</p> <p>24 humiliating. Both my hands were tied in front of me to</p> <p>25 the belt so I could barely lift my arms. I kept telling</p> <p style="text-align: center;">Page 13</p>	<p>1 very tight around his stomach and caused him a lot of</p> <p>2 pain. At the military base, he suffered further</p> <p>3 humiliation as two officers watched him whilst he went</p> <p>4 to the toilet with the waist restraint belt still on</p> <p>5 him. He was returned to Brook House in the early hours</p> <p>6 of the morning after it was confirmed that he had</p> <p>7 outstanding representations. The waist restraint belt</p> <p>8 was removed for the journey back. He was told this was</p> <p>9 because the risk had gone down:</p> <p>10 "I found the experience of that night terrifying and</p> <p>11 humiliating from start to finish. I was treated like an</p> <p>12 animal you were transporting. I had no experience like</p> <p>13 this before. I couldn't believe this was happening to</p> <p>14 me. The whole experience lasted about ten and a half</p> <p>15 hours. The terror of facing removal to Nigeria, of</p> <p>16 being ignored when I tried to explain I had an</p> <p>17 application preventing this, and being placed in</p> <p>18 prolonged restraint throughout was indescribable.</p> <p>19 I still find it difficult to think about the experience</p> <p>20 and it makes me feel very uneasy remembering it. I am</p> <p>21 often having nightmares about it, waking up sweating so</p> <p>22 much that my bedsheets are wet."</p> <p>23 Next, "The remainder of my experience at</p> <p>24 Brook House". The following is a summary of paragraphs</p> <p>25 65 to 67. D1473 saw a nurse after returning to</p> <p style="text-align: center;">Page 15</p>
<p>1 the officers that the belt was too tight but they didn't</p> <p>2 seem to be listening to me. I continued to complain</p> <p>3 about the stomach pain and discomfort it was causing me</p> <p>4 throughout the journey to the airport but no-one</p> <p>5 listened to me or made any attempt to loosen the belt.</p> <p>6 I was kept in a waist restraint belt for a total of five</p> <p>7 and a half hours and didn't ever resist.</p> <p>8 "Being held in that belt for so long made me recall</p> <p>9 my traumatic experiences in detention in Nigeria.</p> <p>10 I understand from the documents that Tascor disclosed in</p> <p>11 my litigation against them that they say the waist</p> <p>12 restraint belt was used because I had a history of being</p> <p>13 disruptive and was on ACDT. I understand that this</p> <p>14 information had come, at least in part, from the</p> <p>15 Home Office. However, this is just not correct.</p> <p>16 I wasn't resisting at all. They weren't listening to me</p> <p>17 and I couldn't access a Home Office official, either in</p> <p>18 the detention centre or on arrival at the airport.</p> <p>19 Moreover, I can't see how my being on self-harm measures</p> <p>20 should have resulted in me being put in this kind of</p> <p>21 restraint."</p> <p>22 I'm summarising paragraphs 61 to 62. On the way to</p> <p>23 the military base where the flight was going, D1473 says</p> <p>24 he kept trying to explain he shouldn't be removed. The</p> <p>25 officers didn't respond. The waist restraint belt was</p> <p style="text-align: center;">Page 14</p>	<p>1 Brook House on 24 August 2017. &lt;HOM029928_0019&gt;. He</p> <p>2 told the nurse of pains to his stomach and shoulder</p> <p>3 caused by the waist restraint belt. The abdominal pains</p> <p>4 continued for several days. He was not seen by a GP</p> <p>5 until 5 September 2017. The stomach pains eventually</p> <p>6 resolved but his shoulders are still very sore from time</p> <p>7 to time. He also asked to see a psychiatrist, as he</p> <p>8 felt mentally unwell. A medical record dated</p> <p>9 26 August 2017, &lt;HOM020028&gt;, noted that D1473 was</p> <p>10 traumatised by his unlawful removal and that it brought</p> <p>11 back memories of -- flashbacks of previous mistreatment</p> <p>12 in Nigeria. He was noted to be hearing voices. He</p> <p>13 started to feel paranoid. No rule 35 report was raised.</p> <p>14 Instead, D1473 was downgraded from Adult at Risk level 3</p> <p>15 to level 2 by the Home Office after a detention review</p> <p>16 on 7 September 2017, &lt;HOM024617&gt;.</p> <p>17 He understands that this was owing to healthcare</p> <p>18 telling the Home Office that D1473's mental health was</p> <p>19 being managed well and that detention didn't appear to</p> <p>20 be making his health worse. I don't understand why</p> <p>21 healthcare would have said that, as it clearly wasn't</p> <p>22 true. The doctor had said the opposite of that in my</p> <p>23 rule 35(3) report. I would have thought I would need to</p> <p>24 be assessed by a psychiatrist before I could be</p> <p>25 downgraded in this way. It doesn't make sense to me</p> <p style="text-align: center;">Page 16</p>

<p>1 that it could be suggested I was improving, especially</p> <p>2 when I was feeling even worse after the failed removal</p> <p>3 and had told healthcare that I felt traumatised, I was</p> <p>4 having flashbacks and hearing voices."</p> <p>5 The summary of paragraphs 69 to 70. D1473 describes</p> <p>6 how Tascor escorts refused to take him to a bail hearing</p> <p>7 on 18 September 2017 because he was on ACDT.</p> <p>8 &lt;HOM025617_0007&gt;. He couldn't understand this, given</p> <p>9 his recent attempted removal whilst on ACDT. He stopped</p> <p>10 eating for a few days. The Home Office refused his</p> <p>11 fresh claim and set a removal window which was only</p> <p>12 deferred following a judicial review. He described</p> <p>13 further thoughts of self-harm at this time:</p> <p>14 "The day before I was released on bail on</p> <p>15 28 September 2017, the IRC staff tried to make me share</p> <p>16 a room with someone I didn't know and I was segregated</p> <p>17 for refusing to do this. At this point, I was feeling</p> <p>18 desperate and couldn't face sharing a cell on B wing.</p> <p>19 I understand from my solicitors that detainees should</p> <p>20 only be segregated in what I would call 'the block' at</p> <p>21 the end of E wing on grounds of security or safety under</p> <p>22 rule 40 of the Detention Centre Rules. I don't know why</p> <p>23 it was necessary to do this to me. Being segregated</p> <p>24 made me feel vulnerable and scared again. This is the</p> <p>25 only time I was in segregation in Brook House.</p> <p style="text-align: center;">Page 17</p>	<p>1 mental health problems was a serious issue. The</p> <p>2 Home Office claimed it was reasonable for me to be</p> <p>3 restrained by the body belt for five and a half hours,</p> <p>4 even though I was compliant.</p> <p>5 "The response to the complaint about being</p> <p>6 unlawfully removed stated that I would not have been</p> <p>7 removed without the representations being dealt with.</p> <p>8 I didn't understand this. Why was I taken to the</p> <p>9 airport under forced restraint and only released from</p> <p>10 them at early in the morning then? I think the</p> <p>11 Home Office can't properly investigate its own staff or</p> <p>12 Tascor because they work together. They don't want to</p> <p>13 own up when something like this happens because it's</p> <p>14 good business to work together and they don't want</p> <p>15 problems. But if the Home Office doesn't deal with</p> <p>16 these types of complaints properly, they will never</p> <p>17 learn from their mistakes and detainees will continue to</p> <p>18 be treated badly.</p> <p>19 "The Home Office didn't even think about whether, if</p> <p>20 they did refuse my representations, I should be able to</p> <p>21 get legal advice and challenge the decision before I was</p> <p>22 removed. My solicitors have advised me that this is an</p> <p>23 important right I had. In the end, the Home Office did</p> <p>24 refuse my representations, but they accepted I should</p> <p>25 have another right of appeal. This would not have</p> <p style="text-align: center;">Page 19</p>
<p>1 "Complaints.</p> <p>2 "I did ask the Home Office, through my solicitors,</p> <p>3 to investigate a complaint about my treatment when I was</p> <p>4 taken from Brook House for removal by the escort on</p> <p>5 23 and 24 August. I also made a complaint about the</p> <p>6 fact that the Home Office had tried to remove me. At</p> <p>7 first, I understand that the Home Office referred the</p> <p>8 complaint about my restraint back to Tascor to deal with</p> <p>9 internally. I have seen email correspondence between</p> <p>10 Tascor and the Home Office [&lt;CAP000539&gt;] confirming that</p> <p>11 the Home Office's initial view was my complaint was</p> <p>12 unlikely to constitute serious or gross misconduct. It</p> <p>13 was minor. I think this shows that they didn't take the</p> <p>14 complaint seriously. I don't think being wrongly</p> <p>15 restrained for five and a half hours was a minor matter.</p> <p>16 My solicitors made representations that the Home Office</p> <p>17 should investigate this complaint, which was accepted.</p> <p>18 "Both complaints were rejected. I was disappointed</p> <p>19 because they didn't seem to deal with my complaints</p> <p>20 properly. The complaint response in relation to the</p> <p>21 restraints stated that there was CCTV from inside the</p> <p>22 vehicle which took me to the airport. My solicitors</p> <p>23 asked for a copy of the CCTV but it was never disclosed.</p> <p>24 The response to the complaint on restraint didn't seem</p> <p>25 to recognise that the use of a body belt when I had</p> <p style="text-align: center;">Page 18</p>	<p>1 happened if I had been forcibly removed as they'd</p> <p>2 planned."</p> <p>3 D1473 describes his complaint was referred to</p> <p>4 Sussex Police but they didn't investigate.</p> <p>5 D1473 describes how Bhatt Murphy brought civil</p> <p>6 claims against the Home Office for unlawful detention</p> <p>7 and Tascor for the use of force, both of which settled</p> <p>8 for compensation without an admission of liability or</p> <p>9 apology:</p> <p>10 "I'm not aware that any steps have been taken by the</p> <p>11 Home Office or Tascor to hold any of their staff</p> <p>12 responsible for these actions and the harm caused to me.</p> <p>13 That is one of the reasons I am participating in this</p> <p>14 inquiry. Paying me compensation without acknowledging</p> <p>15 that they did wrong is not enough. I don't see how</p> <p>16 things will change if nobody is held to account for</p> <p>17 their decisions and actions. They just seem to get away</p> <p>18 with it. I'm also frustrated that my complaints were</p> <p>19 just dismissed. I was made to feel, again, like they</p> <p>20 didn't listen, didn't care about what had happened to</p> <p>21 me. Feeling worthless is one of the worst feelings you</p> <p>22 can have. It still really affects me."</p> <p>23 D1473 has provided a signed statement of truth.</p> <p>24 THE CHAIR: I understand that we are now hearing from you on</p> <p>25 behalf of D2158?</p> <p style="text-align: center;">Page 20</p>

<p>1 MS LUH: Yes.</p> <p>2 Statement of D2158 (read)</p> <p>3 MS LUH: D2158's witness statement to the inquiry is dated</p> <p>4 13 January 2022. It is at &lt;BHM000029&gt;:</p> <p>5 "I was detained at Brook House over four years ago,</p> <p>6 between 10 April and 15 May 2017, for a total of</p> <p>7 35 days. I found my time there difficult and</p> <p>8 distressing and for a long time I tried to forget what</p> <p>9 had happened to me there in order to cope with it.</p> <p>10 I have asked my barrister to read my statement on my</p> <p>11 behalf for this reason.</p> <p>12 "My background.</p> <p>13 "D2158 was born in Iran. He is a victim of child</p> <p>14 sexual abuse. In 2016, he had to flee Iran because he</p> <p>15 had been detained and tortured by police after he</p> <p>16 converted to Christianity. He was also violently</p> <p>17 attacked and stabbed in the street for wearing a cross,</p> <p>18 sustaining serious injuries. He arrived in the UK</p> <p>19 in September 2016, after passing through several</p> <p>20 European countries, including Germany. He made his</p> <p>21 asylum claim on arrival, was interviewed briefly and</p> <p>22 then was granted temporary admission by the Home Office.</p> <p>23 "In November 2016, D2158 received a letter from the</p> <p>24 Home Office informing him of its intention to request</p> <p>25 Germany to take responsibility for his asylum claim</p> <p>Page 21</p>	<p>1 knowledge of English to understand a few things, like</p> <p>2 the healthcare assistant said. Even on the questions</p> <p>3 I understood, I didn't feel I was able to give proper</p> <p>4 answers because there was no interpreter and I didn't</p> <p>5 feel I could explain myself.</p> <p>6 "I do remember being asked whether I had been</p> <p>7 tortured and I said yes, I had been tortured in Iran.</p> <p>8 "An IS91 RA Part A risk factor sheet [&lt;HOM014697&gt;],</p> <p>9 dated 10 April 2017, recorded D2158 had had a stomach</p> <p>10 operation in Iran after being stabbed. He continued to</p> <p>11 suffer stomach pains at the time. D2158 had not been</p> <p>12 able to see a doctor or receive medication for his pain</p> <p>13 since arriving in the UK.</p> <p>14 "The conditions at Brook House and the deterioration</p> <p>15 in my health.</p> <p>16 "After the appointment with the healthcare</p> <p>17 assistant, I was led to another room. I was initially</p> <p>18 placed on what I believed was the induction wing,</p> <p>19 B wing. I was locked into the cell. I would soon find</p> <p>20 out that every day in the evening we were locked in the</p> <p>21 cell by officers and remained locked in until about</p> <p>22 9.00 am the following morning. I found this really hard</p> <p>23 to cope with. Often, I felt claustrophobic. But I felt</p> <p>24 there was nothing I could do once I was locked in, that</p> <p>25 I couldn't ask for help. I was afraid something worse</p> <p>Page 23</p>
<p>1 under the Dublin III regulations. D2158 didn't</p> <p>2 understand what the letter meant.</p> <p>3 "In February 2017, D2158 was asked to report to the</p> <p>4 Home Office every two weeks. He did this regularly</p> <p>5 until he was detained on 10 April 2017 when he reported</p> <p>6 to the Home Office. He was handcuffed and taken to</p> <p>7 Brook House IRC with several other men that day. This</p> <p>8 was late in the night.</p> <p>9 "My detention at Brook House.</p> <p>10 "At first, I didn't know what the place was, but</p> <p>11 when I saw the layout of the centre, the doors which</p> <p>12 were like those of a prison, and that there were people</p> <p>13 of different nationalities there, I realised that I must</p> <p>14 have been taken to a detention centre. I still didn't</p> <p>15 know where I was, what was happening or why I had been</p> <p>16 taken there. By the time we arrived at Brook House, it</p> <p>17 was dark and late. I wanted to say to the officers,</p> <p>18 'Please do not send me back' but my English was very</p> <p>19 limited so I think all I managed to say was 'No back'.</p> <p>20 I was then seen by a person who I now know as</p> <p>21 a healthcare assistant. I was tired, disorientated and</p> <p>22 confused when the appointment with the healthcare</p> <p>23 assistant started. I didn't understand many of</p> <p>24 the questions that I was being asked, because there was</p> <p>25 no interpreter at the appointment. I only had enough</p> <p>Page 22</p>	<p>1 would happen to me if I asked to be let out because,</p> <p>2 more than once, I heard officers take other detainees</p> <p>3 out of their cells and the detainee sounding like they</p> <p>4 were in distress.</p> <p>5 "I was in my cell on my own for one or two nights.</p> <p>6 Then another detainee was put in the cell to share it</p> <p>7 with me. The cell was small and the toilet was inside</p> <p>8 it. There were two walls on either side of the toilet,</p> <p>9 but there was a gap between them and no door to close</p> <p>10 the gap. So if I was in the cell, even sitting or lying</p> <p>11 on the bed, and the person I shared the cell with was on</p> <p>12 the toilet, I could see him or vice versa. It was just</p> <p>13 humiliating for both of us. I still find it very</p> <p>14 difficult to think about the cells I lived in at</p> <p>15 Brook House.</p> <p>16 "The conditions generally at Brook House were</p> <p>17 unhygienic and unsanitary. The shower rooms in</p> <p>18 particular were always dirty. I remember that I once</p> <p>19 went into the showers and, soon after I turned on the</p> <p>20 water, what looked like dirty toilet water started</p> <p>21 coming out of the shower drain. It was awful and</p> <p>22 smelled badly. I also started having palpitations at</p> <p>23 night. I had suffered from these before but in</p> <p>24 detention they became worse. Often, at night, I also</p> <p>25 felt like someone was putting their hands around my</p> <p>Page 24</p>

<p>1 throat and I struggled to breathe. I started having</p> <p>2 nightmares, but while I was not fully asleep. They were</p> <p>3 very vivid. I had never felt like that before. And it</p> <p>4 frightened me.</p> <p>5 "I couldn't stop them from happening. I also</p> <p>6 started suffering from headaches almost every day.</p> <p>7 "On 17 April 2017, I complained to a nurse that</p> <p>8 I was having palpitations and tried to explain that</p> <p>9 I felt like someone was putting their hands around my</p> <p>10 throat. There was no interpreter available, so I had to</p> <p>11 ask another Iranian detainee, who spoke better English</p> <p>12 than me, to attend with me so he could help me</p> <p>13 communicate with the nurse. I had my first appointment</p> <p>14 with the doctor at Brook House after more than two weeks</p> <p>15 there. My solicitors have told me that I should have</p> <p>16 seen a doctor within 24 hours of being at Brook House.</p> <p>17 I didn't know this. No-one told me anything about what</p> <p>18 I should expect in detention or what rights I had. The</p> <p>19 healthcare records say that the doctor was called</p> <p>20 Dr Oozeerally.</p> <p>21 "I do not feel like the doctor examined me in detail</p> <p>22 at the appointment and I struggled to explain myself</p> <p>23 because there was no interpreter in the room. There was</p> <p>24 someone who spoke Farsi on the phone who assisted with</p> <p>25 the appointment but I found it difficult to properly</p> <p style="text-align: center;">Page 25</p>	<p>1 he would do with the information I was providing.</p> <p>2 I didn't know what a rule 35 report was."</p> <p>3 D2158 has not seen a copy of the rule 35 report. It</p> <p>4 has not been disclosed by the Home Office to his</p> <p>5 solicitors or the inquiry. An entry in the medical</p> <p>6 records summarised the report and the Home Office's</p> <p>7 response, &lt;HOM014757&gt;. The entry in my medical records</p> <p>8 say no scars declared observed. But later records</p> <p>9 'small scars on the abdomen noted on left side'. I'm</p> <p>10 confused by this as it appears to be clearly</p> <p>11 contradictory. I also find the Home Office's response</p> <p>12 to the report confusing, as it first says that, 'The</p> <p>13 doctor has noted that you have small scars on the left</p> <p>14 side of the abdomen' but then says, 'In their final</p> <p>15 assessment, the doctor has noted that, whilst you have</p> <p>16 visibly poor dentition, you have no other scars or</p> <p>17 mental health issues which explicitly suggest torture'.</p> <p>18 "Moreover, I know now that the entry in the medical</p> <p>19 records state that I was suffering from palpitations at</p> <p>20 night and the Home Office's response says that,</p> <p>21 according to the doctor, this suggests that I suffered</p> <p>22 from anxiety. Again, confusingly, however, the entry in</p> <p>23 the medical records state that I had never had any</p> <p>24 mental health issues. The doctor didn't ask me about my</p> <p>25 mental health. Having reviewed the records, and the</p> <p style="text-align: center;">Page 27</p>
<p>1 communicate with the doctor through the interpreter on</p> <p>2 the telephone. I'm not sure whether the interpreter was</p> <p>3 a native Farsi speaker but they didn't sound fluent and</p> <p>4 I struggled to understand them and felt that they</p> <p>5 struggled to understand me.</p> <p>6 "The doctor asked me questions about what happened</p> <p>7 to me in the past. I tried to explain that I had been</p> <p>8 detained by the police in Iran, that I had been tortured</p> <p>9 during the time. I explained that the officers had tied</p> <p>10 me to a chair, handcuffed me, put a cloth soaked in oil</p> <p>11 in my mouth and broken my nails. I also told the doctor</p> <p>12 that I had been stabbed with a knife in a separate</p> <p>13 attack in Iran and told him about my scars and the</p> <p>14 surgery I had had after being stabbed.</p> <p>15 "I remember the doctor saw the scars on my abdomen.</p> <p>16 This was the first time I told anyone about what</p> <p>17 happened to me in Iran since I had fled. It was</p> <p>18 difficult to talk about it, especially through an</p> <p>19 interpreter, who I felt didn't understand me, and who</p> <p>20 I couldn't see. It was made even harder because I also</p> <p>21 didn't know why I was being asked questions about it and</p> <p>22 I felt the doctor wasn't really listening to me or</p> <p>23 didn't care. I felt as if he didn't really see me. The</p> <p>24 purpose of the appointment with the doctor wasn't</p> <p>25 explained to me. I didn't understand at the time what</p> <p style="text-align: center;">Page 26</p>	<p>1 Home Office's response, I do not feel that I was</p> <p>2 listened to or assessed properly.</p> <p>3 "The day after my appointment with Dr Oozeerally,</p> <p>4 a nurse told me I had to sign something. I tried to</p> <p>5 explain I couldn't sign because I didn't understand what</p> <p>6 the form they were asking me to sign said. I didn't</p> <p>7 sign the form. I still don't know what it was that</p> <p>8 I was asked to sign. I was never given a copy of it.</p> <p>9 There were rarely interpreters available at Brook House</p> <p>10 and I remember other Iranian detainees also struggled to</p> <p>11 understand what was being said to them and communicated</p> <p>12 with the staff.</p> <p>13 "Throughout my detention, I continued to feel really</p> <p>14 anxious and have palpitations, especially at night.</p> <p>15 I went to healthcare several times to ask for help</p> <p>16 because of this but, more than once, I was told no</p> <p>17 doctor could see me. I also had really severe toothache</p> <p>18 and bleeding from my gums whilst I was at Brook House</p> <p>19 and reported this to healthcare several times since my</p> <p>20 first week in detention. But I was just given some</p> <p>21 painkillers and wasn't seen by a dentist for several</p> <p>22 weeks. The pain and bleeding made it difficult for me</p> <p>23 to eat or drink properly. It also made it hard for me</p> <p>24 to sleep and I felt anxious. After I finally saw the</p> <p>25 dentist, I was given antibiotics. I felt frustrated by</p> <p style="text-align: center;">Page 28</p>

7 (Pages 25 to 28)

<p>1 this, that no-one cared. I felt as though the</p> <p>2 healthcare professionals at Brook House were not</p> <p>3 treating the medical issues I raised seriously.</p> <p>4 "Violence and mistreatment by staff at Brook House.</p> <p>5 "After I moved from B to C wing, things became much</p> <p>6 worse. I was already very anxious. In the new wing,</p> <p>7 I and other detainees were treated badly and often</p> <p>8 bullied by the officers. I felt like the officers at</p> <p>9 Brook House, particularly the ones in C wing, often</p> <p>10 treated us more like animals than human beings.</p> <p>11 I remember two episodes when officers kicked me</p> <p>12 completely without justification."</p> <p>13 D2158 understands that the inquiry will want to know</p> <p>14 the names of the officers who mistreated him or</p> <p>15 mistreated others, but this is difficult because the</p> <p>16 officers didn't normally introduce themselves to the</p> <p>17 detainees or tell them their names:</p> <p>18 "The first time I was in the corridor with other</p> <p>19 detainees and we were about to go into our cells for the</p> <p>20 night lock-up, I was entering my cell on my own because</p> <p>21 my cellmate wasn't there, when an officer approached me</p> <p>22 from behind. At first, I didn't think anything of it</p> <p>23 because I knew he was there to lock my room. However,</p> <p>24 he then kicked me in the bottom of one of my feet,</p> <p>25 pushing me further into the cell. I was shocked when</p> <p style="text-align: center;">Page 29</p>	<p>1 through the first door which led to the corridor. There</p> <p>2 was then a second door at the end of the corridor</p> <p>3 through which you accessed the main building. There was</p> <p>4 an officer standing near the first door. When</p> <p>5 I entered, he just kicked the back of my knees with his</p> <p>6 boots. The kick hurt, especially because he was wearing</p> <p>7 boots, and I stumbled forward. The officer also said</p> <p>8 something to me which I didn't understand. There were</p> <p>9 no other detainees or members of staff present at that</p> <p>10 time. When I went back to my cell, I saw that my</p> <p>11 trousers had been stamped with dirt from his boot. It</p> <p>12 was just humiliating. I don't know why he did that.</p> <p>13 I didn't know the officer. I hadn't spoken to him</p> <p>14 before, so far as I can remember. And I hadn't said</p> <p>15 anything to him when I was in the outdoor yard.</p> <p>16 "I didn't understand what reason he would have to</p> <p>17 treat me like that. I don't know the officer's name,</p> <p>18 but I remember he had short hair and was wearing a dark</p> <p>19 navy shirt with G4S logo on it. It wasn't the same</p> <p>20 officer who kicked me in the first incident that</p> <p>21 I mentioned.</p> <p>22 "There were also other ways in which officers</p> <p>23 mistreated us. For example, I once accidentally dropped</p> <p>24 a plastic spoon I had been given with my meal in the bin</p> <p>25 by mistake and had no cutlery to eat as a result.</p> <p style="text-align: center;">Page 31</p>
<p>1 the officer kicked me. I didn't expect it and</p> <p>2 I stumbled forward. I was wearing flip-flops and he was</p> <p>3 wearing boots, so it hurt the sole of my foot. The</p> <p>4 officer said something in a low voice which I couldn't</p> <p>5 understand. He then left and locked the door to my</p> <p>6 cell. I don't know the officer's name. He was white,</p> <p>7 of medium or large build and had short hair. He looked</p> <p>8 like he was in his mid 30s at the time. I felt too</p> <p>9 scared to react when I was kicked so I didn't say</p> <p>10 anything at that time. In fact, I was scared all the</p> <p>11 time of what the officers could do to me. I had</p> <p>12 previously, not on the same day, heard other detainees</p> <p>13 screaming when my cell door was locked at night and it</p> <p>14 sounded like they were being physically assaulted by</p> <p>15 officers.</p> <p>16 "I couldn't see them, but they sounded like they</p> <p>17 were in pain. I was scared something like that would</p> <p>18 happen to me, so I never put the complaint in about this</p> <p>19 incident.</p> <p>20 "I also didn't know about the complaint system in</p> <p>21 the centre, nor of any organisations that I could speak</p> <p>22 to about complaints. No-one ever told me a complaints</p> <p>23 system existed or how to access it.</p> <p>24 "The second time an officer kicked me, I was coming</p> <p>25 back to C wing from the outdoor yard. I was going</p> <p style="text-align: center;">Page 30</p>	<p>1 I tried to ask an officer for a spoon and a fork to eat</p> <p>2 and explained that I had dropped my spoon in the bin by</p> <p>3 accident. The officer shook his head at me and said no.</p> <p>4 The officer didn't give me any cutlery and gestured to</p> <p>5 one of the bins. An Iranian detainee translated the</p> <p>6 officer's response for me, which was that I would just</p> <p>7 have to take the spoon out of the bin and wash it and</p> <p>8 use it. I was eventually able to get a clean fork from</p> <p>9 another detainee but it felt humiliating and</p> <p>10 unnecessary. I don't remember having any dealings with</p> <p>11 this officer in the past. I don't know why it would</p> <p>12 have been a problem to give me a clean fork or spoon.</p> <p>13 It felt like he was just trying to make me feel like</p> <p>14 I was not a human being.</p> <p>15 "After I was moved to C wing, I also witnessed</p> <p>16 people self-harming and getting no proper help. It was</p> <p>17 horrible. I find remembering these events particularly</p> <p>18 difficult. On one occasion, I was coming back from the</p> <p>19 outdoor yard with other detainees and I heard people</p> <p>20 shouting that a man had cut himself. I went towards the</p> <p>21 place where I thought the shouting was coming from.</p> <p>22 There were several detainees crowding at the door of</p> <p>23 the cell of another Iranian detainee. I can't remember</p> <p>24 his name. But I remember he was from Southern Iran. He</p> <p>25 was young, he couldn't speak English. I entered the</p> <p style="text-align: center;">Page 32</p>



<p>1 cell and saw that he had blood on one of his wrists and</p> <p>2 his hand. He had cut himself with a razor. I started</p> <p>3 talking to him in Farsi, just trying to reassure him</p> <p>4 that he would be okay. There were other people watching</p> <p>5 from the doorway. Not long after I entered, a G4S</p> <p>6 officer entered. He just grabbed me and pushed me out</p> <p>7 of the cell. He said something I couldn't understand.</p> <p>8 This officer was a white male, large build. I recall</p> <p>9 him having very big feet and a shaved head. He appeared</p> <p>10 in his 40s.</p> <p>11 "As I was pushed out of the cell, I saw that there</p> <p>12 was another officer present just outside the room near</p> <p>13 the door. I didn't sustain any injuries as a result of</p> <p>14 the push but I was shocked that the officer had grabbed</p> <p>15 me and forced me out of the cell when I was just trying</p> <p>16 to help the other detainee. I have been asked whether</p> <p>17 I was given any form to fill out after this incident</p> <p>18 happened. I didn't know that there was a procedure</p> <p>19 whereby I may be asked to give my account of what I saw.</p> <p>20 I was not given any form to fill out. I don't know what</p> <p>21 happened to the young man in the cell after the</p> <p>22 incident, but I know that when I left Brook House he was</p> <p>23 still detained there.</p> <p>24 "I also witnessed a second incident where someone</p> <p>25 cut his wrist with a razor while we were in the area</p> <p style="text-align: center;">Page 33</p>	<p>1 it to the door frame. I could see the wire wrapped</p> <p>2 around his neck. There was another detainee shouting</p> <p>3 and calling for help. The man with the wire around his</p> <p>4 neck looked like he was suffocating. It was distressing</p> <p>5 to watch.</p> <p>6 "Two officers arrived and took him away. I don't</p> <p>7 remember healthcare ever arriving. I do not know what</p> <p>8 happened to him."</p> <p>9 Next, "The attempt to remove me and my decision to</p> <p>10 refuse food".</p> <p>11 On 9 May 2017, the Home Office sought to remove</p> <p>12 D2158 to Germany. He wasn't told in advance and he</p> <p>13 didn't know what was going on. He refused to go by</p> <p>14 shaking his head. He was very scared. The removal was</p> <p>15 later cancelled:</p> <p>16 "After that day, I felt even more scared and anxious</p> <p>17 that I would be removed and I stopped eating. I did</p> <p>18 this because I was struggling to cope with detention and</p> <p>19 felt I needed something to happen. I couldn't take it</p> <p>20 anymore. I can't remember how many days I went without</p> <p>21 eating but I think it was three to four days. I was</p> <p>22 checked by healthcare during this time but their checks</p> <p>23 just consisted of asking me whether I had eaten and</p> <p>24 I think ticking a box when I said I hadn't. It looked</p> <p>25 like they did this on a form, but I was never given</p> <p style="text-align: center;">Page 35</p>
<p>1 where we normally ate. I didn't know that detainee. It</p> <p>2 was horrible. There was blood everywhere. I was not</p> <p>3 closely involved but I saw it. Officers came and took</p> <p>4 him away from the area.</p> <p>5 "There was a third incident that I witnessed through</p> <p>6 my time in Brook House. I was watching television in</p> <p>7 the indoor recreation area when suddenly I heard a loud</p> <p>8 noise. It sounded like people shouting. I went towards</p> <p>9 where the noise was coming from in the eating area</p> <p>10 opposite where I was and there was already other</p> <p>11 detainees gathered around the table where we normally</p> <p>12 ate. We were on the ground floor of the building and</p> <p>13 the noise was coming from the floor above us. You could</p> <p>14 see the landing of that floor; if you stood on top of</p> <p>15 the table at the central area, it was open and there was</p> <p>16 no ceiling there dividing it from the floor above.</p> <p>17 "When I got onto the table, I saw that on the floor</p> <p>18 above us there was a detainee who had wrapped what</p> <p>19 I believe was the wire of an electric shaver around his</p> <p>20 neck and was trying to either strangle or hang himself</p> <p>21 with it. He was standing in the doorway of a cell. I'm</p> <p>22 not sure whether his feet were fully on the floor.</p> <p>23 I didn't know the detainee but I remember he was a black</p> <p>24 man. I couldn't see well, from where I was standing,</p> <p>25 where the wire went, but I believe he had tried to tie</p> <p style="text-align: center;">Page 34</p>	<p>1 a copy of it. I don't believe they took any</p> <p>2 observations. I remember, once, during this period,</p> <p>3 a male member of staff asked me why I was not eating or</p> <p>4 drinking and I just said no and shook my head. He</p> <p>5 didn't ask me any further questions. There were no</p> <p>6 interpreters present during this exchange or any other</p> <p>7 checks from officers about my food or drink refusal.</p> <p>8 "On 12 May 2017, I had an appointment with the</p> <p>9 nurse. I struggle to remember exactly what happened</p> <p>10 exactly at the appointment as I was going through a very</p> <p>11 difficult time. I was not eating and I felt weak.</p> <p>12 I remember I just had my head down and I felt weak.</p> <p>13 I remember saying I wanted to leave Brook House. I felt</p> <p>14 depressed and just didn't want to be there. The women,</p> <p>15 who could speak Farsi, asked me to try and speak to them</p> <p>16 as they may be able to help me. I did speak to them for</p> <p>17 some time, although I don't remember what was discussed</p> <p>18 exactly. However, after a while, I felt trapped and</p> <p>19 claustrophobic in the room, like I was in a cage, and</p> <p>20 I asked to leave and they allowed me to do so.</p> <p>21 "My release from Brook House and the impact on me.</p> <p>22 "I was released from Brook House on 15 May 2017. My</p> <p>23 solicitor has told me that my release was in fact</p> <p>24 authorised on 11 May 2017. I don't know why I was not</p> <p>25 told that my release had been authorised and the reasons</p> <p style="text-align: center;">Page 36</p>

<p>1 for this. I have now been told by my solicitor that the</p> <p>2 decision was made because I couldn't be removed to</p> <p>3 Germany. I find it difficult to understand why the</p> <p>4 Home Office didn't tell me this and left me without any</p> <p>5 knowledge that I would be released, especially when it</p> <p>6 was such a distressing time for me. I find talking</p> <p>7 about my detention at Brook House really difficult and</p> <p>8 thinking about what happened to me there makes me really</p> <p>9 anxious. Since being released, I have struggled to</p> <p>10 sleep properly. I have had nightmares and flashbacks to</p> <p>11 my treatment in Iran and to my time at Brook House and</p> <p>12 the things I witnessed there. I also still suffer from</p> <p>13 heart palpitations. In December 2017, my GP diagnosed</p> <p>14 me with PTSD. I was also, more recently, in June 2021,</p> <p>15 assessed by a psychiatrist, Dr Paula Murphy, who</p> <p>16 prepared a report for me and diagnosed me with PTSD and</p> <p>17 said, in her opinion, this was made worse by my</p> <p>18 detention at Brook House."</p> <p>19 D2158 has provided a statement of truth. He</p> <p>20 confirms that the statement has been translated and read</p> <p>21 to him in Farsi by a professional interpreter.</p> <p>22 THE CHAIR: Thank you very much, Ms Luh. I would like to</p> <p>23 thank your clients, D1473 and D2158, for providing that</p> <p>24 information to the inquiry.</p> <p>25 I'm going to ask that we take a short five-minute</p> <p style="text-align: center;">Page 37</p>	<p>1 an article 3 basis.</p> <p>2 He explains that he has suffered from a drug</p> <p>3 addiction for some years, which has resulted in him</p> <p>4 spending time in prison. D313 stopped using drugs when</p> <p>5 he was released from immigration detention in 2019. He</p> <p>6 is now drug free and his life has completely changed for</p> <p>7 the better.</p> <p>8 D313 has not been detained nor had any legal issues</p> <p>9 since, which allows him to take care of his elderly</p> <p>10 mother and unwell brother.</p> <p>11 When his appeal was allowed, the immigration judge</p> <p>12 complimented his hard work.</p> <p>13 D313 also explains that he has suffered from mental</p> <p>14 ill-health for many years, which he still struggles to</p> <p>15 cope with. He has been diagnosed as suffering from</p> <p>16 severe depression and anxiety. He has self-harmed for</p> <p>17 a number of years, including whilst in detention.</p> <p>18 D313 explains that, whilst detained at</p> <p>19 Harmondsworth IRC, Dr Lisa Wootton diagnosed him with</p> <p>20 a learning difficulty, attention deficit hyperactivity</p> <p>21 disorder and conduct disorder, a personality disorder,</p> <p>22 a mood disorder and substance dependence. Dr Wootton</p> <p>23 also stated in her report that detention was likely to</p> <p>24 increase D313's stress levels and have a negative effect</p> <p>25 on his mental health, which led to an increased risk of</p> <p style="text-align: center;">Page 39</p>
<p>1 comfort break before we then hear from you, Mr Lee.</p> <p>2 Thank you very much.</p> <p>3 (11.00 am)</p> <p>4 (A short break)</p> <p>5 (11.12 am)</p> <p>6 THE CHAIR: Mr Lee, I understand we are hearing from you on</p> <p>7 behalf of your client D313.</p> <p>8 MR LEE: Thank you, chair. D313, in fact, attends. He sits</p> <p>9 in the public gallery but would prefer me to read and</p> <p>10 summarise his statement.</p> <p>11 Statement of D313 (read)</p> <p>12 MR LEE: His statement is dated 21 February 2022 and has</p> <p>13 been given the reference &lt;DL0000233&gt; and in common with</p> <p>14 the other witnesses, there is both a witness statement</p> <p>15 and a summary note, chair, which I hope you have.</p> <p>16 THE CHAIR: I do, thank you.</p> <p>17 MR LEE: The first 17 paragraphs can be summarised as</p> <p>18 follows. D313 explains that he is a national of Morocco</p> <p>19 and that he was detained at Brook House between</p> <p>20 30 May 2017 and 28 June 2017, when he was released on</p> <p>21 bail.</p> <p>22 It was not his first time in immigration detention,</p> <p>23 nor his last. However, in June 2021, he was granted</p> <p>24 30 months leave to remain, after his appeal against the</p> <p>25 decision to revoke his deportation order was allowed on</p> <p style="text-align: center;">Page 38</p>	<p>1 self-harm and suicide in detention.</p> <p>2 She noted that D313 was likely to continue to</p> <p>3 self-harm and that he had a number of risk factors for</p> <p>4 completed suicide.</p> <p>5 Dr Wootton also noted D313's achievements, as the</p> <p>6 immigration judge had, when she further assessed him and</p> <p>7 prepared another report in 2020. At that time, she</p> <p>8 considered the risk of self-harm to be moderate, and his</p> <p>9 risk of suicide to be reduced by his relative stability,</p> <p>10 the family support available to him and his abstinence</p> <p>11 from illicit substances.</p> <p>12 Dr Wootton identified a number of factors, including</p> <p>13 detention and return to Morocco, which were likely to</p> <p>14 render the risk of self-harm and suicide as high.</p> <p>15 D313 also explains that he has suffered from</p> <p>16 a severe learning disability since childhood. He was</p> <p>17 assessed by a learning psychologist, Dr Tim Green, who</p> <p>18 prepared a report in 2020. Dr Green noted in his report</p> <p>19 that D313's IQ falls well below the fifth percentile and</p> <p>20 that his intellectual functioning and memory were</p> <p>21 significantly impaired. D313 was deemed not to have</p> <p>22 litigation capacity during his successful appeal.</p> <p>23 Paragraphs 23 to 24, chair, can be summarised as</p> <p>24 follows. D313 states that he was transferred to</p> <p>25 Brook House from Harmondsworth IRC on 29 May 2017. It</p> <p style="text-align: center;">Page 40</p>

10 (Pages 37 to 40)

<p>1 was not his first time in Brook House. There was a plan</p> <p>2 to deport him to Morocco on 30 May 2017. He was held in</p> <p>3 rule 40 isolation before the proposed flight.</p> <p>4 Picking up the witness statement at paragraph 25:</p> <p>5 "It was really frightening to be held in isolation</p> <p>6 at this point. I felt like harming myself. I was</p> <p>7 getting removed to a country that I hadn't been to for</p> <p>8 so many years. I didn't know when my flight was and</p> <p>9 I couldn't prepare for it. I was by myself and I was</p> <p>10 just walking up and down. I had no-one to talk to.</p> <p>11 I was very upset and I was in tears."</p> <p>12 Paragraph 26 is summarised as, a.</p> <p>13 "N application for judicial review stopped D313's</p> <p>14 deportation."</p> <p>15 Picking up the statement again, chair, at</p> <p>16 paragraph 28:</p> <p>17 "My experiences at Brook House IRC are extremely</p> <p>18 negative. In particular, the conditions at Brook House</p> <p>19 were very similar to a prison, as we were locked in for</p> <p>20 much of the day and we were treated like prisoners."</p> <p>21 Summary of paragraphs 29 to 30. D313 explains that</p> <p>22 the mobile phones only worked outside at Brook House and</p> <p>23 only in some areas indoors. He states that detainees</p> <p>24 were locked in at night between 9.00 pm and 8.00 am and</p> <p>25 at lunch time.</p> <p style="text-align: center;">Page 41</p>	<p>1 aspects of culture."</p> <p>2 Paragraph 39 is summarised as:</p> <p>3 "D313 talks about officers taking a lot of time to</p> <p>4 respond when other detainees pushed their cell bells."</p> <p>5 He states that he could hear noises of officers</p> <p>6 talking and moving around in a room nearby when this</p> <p>7 happened. He also describes difficulties in sleeping</p> <p>8 due to the noise at Brook House.</p> <p>9 Paragraphs 42 and 45 are summarised as:</p> <p>10 "D313 refers to his first night healthcare screening</p> <p>11 which took place when he arrived at Brook House during</p> <p>12 the relevant period."</p> <p>13 He refers to the record of that screening at</p> <p>14 &lt;CJS006629_001&gt;. It suggests that he had not tried to</p> <p>15 harm himself in prison or out of prison and he did not</p> <p>16 have thoughts of deliberate self-harm.</p> <p>17 D313 states that he cannot recall whether he was</p> <p>18 asked questions about these matters, but explains the</p> <p>19 difficulties he would have had in talking about</p> <p>20 self-harm to a stranger who he had just met shortly</p> <p>21 after arriving at Brook House.</p> <p>22 D313 explains that he needs a lot of support to talk</p> <p>23 about his problems. However, there were numerous</p> <p>24 entries in D313's medical records which confirmed D313's</p> <p>25 history of self-harm and attempts at suicide. He notes</p> <p style="text-align: center;">Page 43</p>
<p>1 Paragraph 31:</p> <p>2 "The worst thing for me about being in a detention</p> <p>3 centre, including whilst at Brook House, is that I was</p> <p>4 so worried about getting deported all of the time."</p> <p>5 Paragraph 32. D313 states he had his own cell at</p> <p>6 Brook House and he is aware that he had been assessed as</p> <p>7 not suitable for a shared cell.</p> <p>8 Paragraphs 35 and 36:</p> <p>9 "At Brook House, I felt depressed and lonely, as</p> <p>10 I had no-one to talk to during long periods locked into</p> <p>11 my cell. The cell was cold and I had nothing to do.</p> <p>12 I would often self-harm whilst I was alone at night.</p> <p>13 I felt I had no hope and I thought about ending my life.</p> <p>14 I didn't report how I was feeling as there was no-one</p> <p>15 I trusted enough to open up to. I didn't want everyone</p> <p>16 to know how bad my mental health was. I was really</p> <p>17 worried that if I trusted one staff member and opened up</p> <p>18 to them, that they would tell someone else and everyone</p> <p>19 would find out. I was very scared that people would</p> <p>20 know how I was truly feeling.</p> <p>21 "It was normal for detainees at Brook House to spend</p> <p>22 time with people from the same country as it was</p> <p>23 difficult to survive in a place like that without any</p> <p>24 friends, and it was often easier to establish</p> <p>25 friendships with people who shared a language and</p> <p style="text-align: center;">Page 42</p>	<p>1 that the entry relating to the first night's screening</p> <p>2 states that health information had not been received</p> <p>3 from an outside source. He states that it seems his</p> <p>4 history was not considered. He also notes that the</p> <p>5 Home Office was aware of the contents of Dr Wootton's</p> <p>6 report of 25 May 2017 by 30 May 2017, at the latest, due</p> <p>7 to the available records.</p> <p>8 He also notes, in relation to the first night's</p> <p>9 screening, that, while the entry states that he had not</p> <p>10 received medication for mental health problems, he had</p> <p>11 been taking medication for his mental health whilst in</p> <p>12 prison, as confirmed by his medical records.</p> <p>13 Paragraphs 48 to 50. D313 believes he saw a nurse</p> <p>14 once or twice more during this period of detention at</p> <p>15 Brook House. He refers to an entry in his medical</p> <p>16 records at &lt;CJS006629_0003, where he was complaining</p> <p>17 about pain which he thought was stress related. He</p> <p>18 believes he was given some tablets by healthcare but did</p> <p>19 not know exactly what they were, but thought they were</p> <p>20 for his mental health. D313 states that he did not</p> <p>21 attend some prebooked appointments either because he was</p> <p>22 unwell or didn't feel with it. Also, he didn't</p> <p>23 particularly trust anyone who was working at</p> <p>24 Brook House.</p> <p>25 He explains that he wanted to build a relationship</p> <p style="text-align: center;">Page 44</p>

<p>1 before he would come to trust a medical professional, 2 but this never happened at Brook House. He thought they 3 were part of the system and he was scared of asking for 4 help.</p> <p>5 Paragraphs 53 and 54. D313 discusses having 6 a reduction in dosage of medication to prepare him for 7 being deported to Morocco. He describes it as inhumane 8 and states it made him feel really unwell. D313 states 9 that it made him want to hurt himself. He refers to 10 previous examples of the negative impact of withdrawal 11 on him during his detention, including sweating, chills, 12 aches and pains.</p> <p>13 Picking up the witness statement, chair, at 14 paragraph 55:</p> <p>15 "I didn't get clean or think about getting clean at 16 Brook House because I was too worried about getting 17 deported. My experience was that the people who worked 18 at Brook House were extremely aggressive and they seemed 19 to enjoy punishing detainees. The officers maintained 20 a culture of intimidation and fear within Brook House, 21 which they used to control the detainees. I remember 22 many of us were scared of the staff. I was worried that 23 if I did anything that they thought was bad, I would be 24 targeted by the officers. This was a very common topic 25 of conversation amongst detainees. A lot of people said</p> <p style="text-align: center;">Page 45</p>	<p>1 and was, at the time, coming back down to normal. 2 DCO Sayers took D313 back to his cell. D313 does not 3 know what provoked the attack by DCO Sayers. He did not 4 assault DCO Sayers. D313 states that he thinks 5 DCO Sayers was just angry at something and did not like 6 him and gave him a full punch to the face.</p> <p>7 Picking up the witness statement at paragraph 68: 8 "It was extremely painful and I was knocked 9 completely over. Officer Sayers then picked me up by my 10 face and threw me back on the bed. There was nothing 11 I could do to stop him hurting me. He was so much 12 bigger and more powerful than me.</p> <p>13 "I remember that when Officer Sayers assaulted me, 14 there was at least one other officer with him. Nobody 15 offered me any help and support afterwards.</p> <p>16 "After he attacked me, I just sat there on the bed 17 and cried. I wondered why he'd done this to me, but 18 there didn't appear to be any explanation, except that 19 he wanted to hurt me and felt able to abuse me in this 20 way without any negative consequences. I remember 21 self-harming and thinking about what had happened to me 22 and how unfair it was.</p> <p>23 "I was in a lot of pain afterwards in my cheek. It 24 was red and bruised. My mental health suffered for some 25 time afterwards. I still think about this incident.</p> <p style="text-align: center;">Page 47</p>
<p>1 they were scared of what might happen to them. There 2 was a horrible tension in the air. I know that a lot of 3 individuals were assaulted by the officers because 4 I either witnessed it or heard about it from other 5 detainees. However, on many occasions, the detainees 6 who had been assaulted would be removed from the country 7 and nobody would hear from them again. Individuals who 8 didn't speak English had it particularly bad. The 9 officers would therefore get away with it. This allowed 10 the violence to continue."</p> <p>11 Paragraphs 60 to 67 are summarised as follows. 12 D313, who is very slight, remembers when he was 13 assaulted by DCO Sayers on 15 June 2017. He states that 14 he knew DCO Sayers as a big man who was very aggressive 15 towards the detainees. He was aware of DCO Sayers' 16 reputation, even before the assault, and found him 17 extremely intimidating. D313 refers to an incident when 18 DCO Sayers used force on a Romanian detainee who didn't 19 speak English. D313 believed the man had mental health 20 issues. He witnessed the detainee say something and 21 DCO Sayers grabbed him, put him on the floor and put 22 a knee on the man's back. The bell went and lots of 23 officers arrived, put handcuffs on the detainee and took 24 him away screaming and crying.</p> <p>25 On 15 June 2017, D313 had suffered a spice attack</p> <p style="text-align: center;">Page 46</p>	<p>1 I remember that my family came to visit me when I still 2 had marks from this assault. I didn't want to tell them 3 what had happened. They were already suffering because 4 I was in detention and I didn't want them to suffer 5 more."</p> <p>6 Paragraphs 72 and 73 are summarised as follows. 7 D313 now understands that DCO Sayers was investigated 8 for this assault after footage from the BBC showed what 9 he had done. It led to an investigation report which 10 notes, at &lt;HOM001585_0006&gt;, that DCO Sayers had claimed 11 that he'd accidentally used D313's face to get up off 12 the bed. However, according to a witness, DCO Sayers 13 had struck D313 with the back of his hand. It's also 14 noted that a fellow officer had asked DCO Sayers whether 15 he had a good team, which was taken to mean if he had 16 officers who would cover up his actions. DCO Sayers 17 replied, 'No, that's why I did it on my own'.</p> <p>18 D313 explains that the allegation was only partially 19 substantiated, including, at &lt;HOM001585_0009&gt;, that 20 there was insufficient evidence to support the 21 allegation of assault on D313, but that there was 22 sufficient evidence to demonstrate that DCO Sayers 23 employed an unapproved use of force and lied when he 24 stated that he was alone during the incident.</p> <p>25 Picking up the witness statement, chair, at</p> <p style="text-align: center;">Page 48</p>

<p>1 paragraph 74:</p> <p>2 "I think that DCO Sayers and the other officers</p> <p>3 attempted to cover up what happened to me. It's clear</p> <p>4 from the investigation report that the officers stuck</p> <p>5 together and tried to help each other out. They thought</p> <p>6 that they would get away with it because most detainees</p> <p>7 couldn't speak up or out for themselves."</p> <p>8 Paragraphs 75 and 77 are summarised as follows.</p> <p>9 D313 notes that it appears from the investigation report</p> <p>10 that the officers did not report the incident and that</p> <p>11 they also did not ask for him to get medical care, which</p> <p>12 shows that they did not want anyone to find out what had</p> <p>13 happened. D313 is really upset by the outcome. He's</p> <p>14 not sure why, when it had been found that DCO Sayers had</p> <p>15 lied about what happened, that anything he had to say</p> <p>16 about the incident was believed. D313 does not know why</p> <p>17 anyone would believe he tried to assault DCO Sayers,</p> <p>18 given how big he was compared to him.</p> <p>19 Back to the witness statement, chair, at</p> <p>20 paragraph 78:</p> <p>21 "I was not asked any questions by the investigators</p> <p>22 and I was not given an opportunity to explain what had</p> <p>23 happened to me. I think this is completely wrong.</p> <p>24 I was the victim and they should have asked me what</p> <p>25 happened. Without asking me any questions, the</p> <p style="text-align: center;">Page 49</p>	<p>1 no-one there who I felt that I was able to confide in</p> <p>2 and who may have been able to help me with any</p> <p>3 complaints. In any event, I was too frightened to say</p> <p>4 anything anyway. I knew exactly what could happen when</p> <p>5 you got on the wrong side of one of the officers and</p> <p>6 I was too scared. I retreated into myself after I was</p> <p>7 assaulted and I did not want to raise too much of</p> <p>8 a fuss. I would have been too scared to speak out.</p> <p>9 I also did not think I would be taken seriously if</p> <p>10 I complained. The investigation into the assault on me</p> <p>11 by Officer Sayers on 15 June 2017, which failed to get</p> <p>12 an account from me, only confirms my feelings about the</p> <p>13 complaints process."</p> <p>14 Paragraphs 89 to 90 are summarised as:</p> <p>15 "D313 did not have a rule 35 assessment at</p> <p>16 Brook House. He did not understand what one was and</p> <p>17 nobody explained or provided any support."</p> <p>18 Paragraphs 91 and 92 are summarised. D313 does not</p> <p>19 believe he was on ACDT whilst at Brook House although he</p> <p>20 did feel suicidal and hurt himself. He notes he had</p> <p>21 regularly been placed on ACDT whilst in prison. D313</p> <p>22 used spice whilst at Brook House but not very often. He</p> <p>23 knew it was bad for him and saw how it affected others</p> <p>24 but was suggestible in relation to drugs at that time.</p> <p>25 He describes spice use as absolutely widespread and</p> <p style="text-align: center;">Page 51</p>
<p>1 investigation only had one side of the story, which</p> <p>2 wasn't true. I remember another incident at Brook House</p> <p>3 which happened before I was granted bail. The officers</p> <p>4 told me that I was going to be moved to another</p> <p>5 detention centre, Morton Hall. My bail hearing was</p> <p>6 coming up soon and I knew that I had an opportunity to</p> <p>7 be released. I also knew my family was going to attend</p> <p>8 court to act as referees for me. I was desperate to</p> <p>9 have my bail hearing and to have a chance at being</p> <p>10 released from detention, so I said that I did not want</p> <p>11 to be transferred. The officers were very angry at me</p> <p>12 and they handcuffed me and pulled my hands back. This</p> <p>13 was extremely painful."</p> <p>14 Paragraph 82 is summarised as:</p> <p>15 "D313 had his bail hearing the next day and was</p> <p>16 granted bail and released."</p> <p>17 Back to the witness statement at paragraph 83:</p> <p>18 "Use of force and complaints.</p> <p>19 "I was not aware of how to complain or what the</p> <p>20 processes were whilst at Brook House and I did not make</p> <p>21 a complaint after I was assaulted by Officer Sayers or</p> <p>22 for the assault on me before I was granted bail. I have</p> <p>23 a serious learning disability, so, even if there were</p> <p>24 materials available telling me how to complain,</p> <p>25 I wouldn't have been able to read them. There was</p> <p style="text-align: center;">Page 50</p>	<p>1 states it was really easy to get hold of, everyone had</p> <p>2 it. He is sure that officers must have been aware of</p> <p>3 how spice was getting in or been involved, as it was</p> <p>4 obvious someone was helping to get it in. D313 was not</p> <p>5 aware of spice coming in through visits. He states that</p> <p>6 detainees could get hold of anything at Brook House,</p> <p>7 including any drugs, cigarettes and mobile phones.</p> <p>8 Finally, chair, back to the witness statement at</p> <p>9 paragraph 98, under the heading "Impact":</p> <p>10 "I still have bad memories about what happened to me</p> <p>11 in Brook House. I still think about the bad things that</p> <p>12 have happened in the past, including my experiences in</p> <p>13 Brook House. This makes me struggle to sleep at night.</p> <p>14 I remember the violence in the detention centre between</p> <p>15 officers and other detainees and when I was assaulted.</p> <p>16 Everything that I've been through makes it difficult to</p> <p>17 recover fully. I spend most of my time indoors and</p> <p>18 I find it difficult to go out. Whilst I've been granted</p> <p>19 leave to remain now, I've not escaped my past</p> <p>20 experiences in immigration detention."</p> <p>21 That witness statement is signed, chair, and has the</p> <p>22 usual statement of truth at the end.</p> <p>23 THE CHAIR: Thank you very much. Thank you, Mr Lee, and</p> <p>24 thank you, too, to D313 for taking the time to attend</p> <p>25 today. It is very much appreciated.</p> <p style="text-align: center;">Page 52</p>

<p>1 I suggest we now take our 15-minute break. We are</p> <p>2 going to be hearing from a live witness following that</p> <p>3 break, so that should give us time to organise that. We</p> <p>4 will reconvene at 11.45 am. Thank you.</p> <p>5 (11.33 am)</p> <p>6 (A short break)</p> <p>7 (11.50 am)</p> <p>8 MR ALTMAN: Chair, the next witness is Chris Donnelly.</p> <p>9 MR CHRISTOPHER MARTIN DONNELLY (affirmed)</p> <p>10 Examination by MR ALTMAN</p> <p>11 MR ALTMAN: Let us have your full name, please.</p> <p>12 <b>A. Christopher Martin Donnelly.</b></p> <p>13 Q. Mr Donnelly, you will confirm that you have provided two</p> <p>14 witness statements to the inquiry; is that right?</p> <p>15 <b>A. That's correct.</b></p> <p>16 Q. The first of them dated 17 February of this year, which</p> <p>17 is &lt;SER000444&gt;, and the second of which, I think, is</p> <p>18 dated, curiously, 16 February, but that is &lt;SER000442&gt;.</p> <p>19 Chair, I invite you to adduce those two statements,</p> <p>20 please, in full.</p> <p>21 THE CHAIR: Indeed, thank you.</p> <p>22 MR ALTMAN: Mr Donnelly, first of all, I want you to tell us</p> <p>23 something about yourself. Clearly, you worked at G4S,</p> <p>24 becoming a detainee custody manager, or a DCM. When did</p> <p>25 you become a DCM at Brook House?</p> <p style="text-align: center;">Page 53</p>	<p>1 <b>A. I worked for Safeway, later Morrisons, for 20 years as</b></p> <p>2 <b>a deputy store manager.</b></p> <p>3 Q. How did that equip you for work at Brook House?</p> <p>4 <b>A. It taught me to manage teams of people and also dealing</b></p> <p>5 <b>with the public, which I had to do quite a lot in my</b></p> <p>6 <b>role. So, yes, it was fairly good preparation.</b></p> <p>7 Q. Fairly good, but was it, in your view, adequate</p> <p>8 preparation for the kind of people, if you like, the</p> <p>9 customers, who you were dealing with at Brook House?</p> <p>10 <b>A. Probably not. It was a bit of a shock.</b></p> <p>11 Q. Yes. "Shock" in the sense that dealing with customers</p> <p>12 in a Safeway supermarket is not going to confront you</p> <p>13 with the kind of issues, of which there were many, that</p> <p>14 confronted you at Brook House, presumably?</p> <p>15 <b>A. That's fair to say.</b></p> <p>16 Q. And almost the same would be true of any other custody</p> <p>17 officer, whether a DCM or DCO, at Brook House during</p> <p>18 that period?</p> <p>19 <b>A. I would say so.</b></p> <p>20 Q. You say it was, I think, a bit of a shock?</p> <p>21 <b>A. Yes.</b></p> <p>22 Q. In what way?</p> <p>23 <b>A. Just when the centre first opened, a huge percentage of</b></p> <p>24 <b>the detainees were --</b></p> <p>25 Q. "Detainees", detained persons?</p> <p style="text-align: center;">Page 55</p>
<p>1 <b>A. I joined the company in 2008, and I applied, before the</b></p> <p>2 <b>centre opened, to become a detainee custody manager.</b></p> <p>3 <b>So, when the centre opened, I was a manager.</b></p> <p>4 Q. The centre opened in March 2009, didn't it?</p> <p>5 <b>A. That's right.</b></p> <p>6 Q. You joined the company when in 2008?</p> <p>7 <b>A. December 2008.</b></p> <p>8 Q. December?</p> <p>9 <b>A. Yes.</b></p> <p>10 Q. So a few months before Brook House opened?</p> <p>11 <b>A. Yes.</b></p> <p>12 Q. You left, just so we can get an idea of the period of</p> <p>13 time when you were a DCM at Brook House, when did you</p> <p>14 leave?</p> <p>15 <b>A. I am still --</b></p> <p>16 Q. You're still there with Serco?</p> <p>17 <b>A. -- at Brook House, yes.</b></p> <p>18 Q. When the company lost its contract, you carried on when</p> <p>19 Serco took over?</p> <p>20 <b>A. That's correct.</b></p> <p>21 Q. Are you still a DCM at Brook House?</p> <p>22 <b>A. Yes.</b></p> <p>23 Q. Prior to you gaining that appointment in 2008 and when</p> <p>24 the centre opened in March 2009, what previous</p> <p>25 experience did you have?</p> <p style="text-align: center;">Page 54</p>	<p>1 <b>A. Detained persons, sorry, were ex-HMP, and the level of</b></p> <p>2 <b>verbal abuse that we used to receive was quite a --</b></p> <p>3 <b>quite a shock.</b></p> <p>4 Q. We will come to what you have to say about it in a few</p> <p>5 moments, but it was, as you have just described it, the</p> <p>6 treatment that the detained persons were meting out</p> <p>7 towards the officers?</p> <p>8 <b>A. Yes.</b></p> <p>9 Q. Not the other way around?</p> <p>10 <b>A. No, not the other way around.</b></p> <p>11 Q. Amongst the population of Brook House were also</p> <p>12 time-served foreign national offenders?</p> <p>13 <b>A. Yes.</b></p> <p>14 Q. What impact did they have on the life and running of</p> <p>15 the centre?</p> <p>16 <b>A. When we first opened, the detained people were much more</b></p> <p>17 <b>familiar with the sort of regime of a prison or</b></p> <p>18 <b>detention centre than we were, initially, so we did find</b></p> <p>19 <b>it quite difficult to find the right level of care.</b></p> <p>20 Q. By which you mean?</p> <p>21 <b>A. Just that they were more familiar with the environment</b></p> <p>22 <b>than we were.</b></p> <p>23 Q. So they had experience of having served time in prison,</p> <p>24 however long that time had been, whereas</p> <p>25 Christopher Donnelly, in your case, was, effectively,</p> <p style="text-align: center;">Page 56</p>

<p>1 fresh faced from Safeway or Morrisons, wherever it was,</p> <p>2 as a manager in a supermarket, and there you were</p> <p>3 confronted by a completely different ball game, really?</p> <p>4 <b>A. Yes.</b></p> <p>5 Q. You say in your first witness statement -- we don't have</p> <p>6 to put it up, but for reference, it's at paragraph 6:</p> <p>7 "In retrospect, I do not believe the recruitment</p> <p>8 process prepared any of us for the reality of life in an</p> <p>9 IRC."</p> <p>10 <b>A. Yes.</b></p> <p>11 Q. What was it about the recruitment process that you think</p> <p>12 didn't prepare you?</p> <p>13 <b>A. It didn't make clear the sort of environment that we</b></p> <p>14 <b>would be going into. There was nothing specifically</b></p> <p>15 <b>about we were going to be dealing with so many foreign</b></p> <p>16 <b>national prisoners, ex-foreign national prisoners.</b></p> <p>17 <b>There was nothing like that in the recruitment.</b></p> <p>18 Q. When you talk about the recruitment process, what part</p> <p>19 of the process do you have in mind? What do you mean by</p> <p>20 "recruitment"?</p> <p>21 <b>A. The initial job advertisement, I think, which was in --</b></p> <p>22 <b>I can't remember which paper, but it was in the paper.</b></p> <p>23 Q. That's what you reacted to to take the job?</p> <p>24 <b>A. Yes.</b></p> <p>25 Q. I suppose you're not going to expect G4S or any other</p> <p style="text-align: center;">Page 57</p>	<p>1 Q. Managing people?</p> <p>2 <b>A. Yes.</b></p> <p>3 Q. You say in paragraph 6 -- have you got your statement in</p> <p>4 front of you?</p> <p>5 <b>A. Yes.</b></p> <p>6 Q. By all means, you can refer to them. As I say, I'm not</p> <p>7 going to put this up on screen. It's your first witness</p> <p>8 statement ending, for our purposes, 444. It is your</p> <p>9 paragraph 6 on page 2. Chair, you should have this</p> <p>10 behind your first flag.</p> <p>11 THE CHAIR: Thank you.</p> <p>12 MR ALTMAN: You say at the end of that paragraph,</p> <p>13 paragraph 6:</p> <p>14 "To be fair to G4S, the existing IRCs [immigration</p> <p>15 removal centres] Tinsley House and Oakington, which the</p> <p>16 company managed, were a far smaller, calmer and less</p> <p>17 challenging centre than Brook House turned out to be."</p> <p>18 Had you ever worked at them?</p> <p>19 <b>A. No.</b></p> <p>20 Q. Did you ever work at them?</p> <p>21 <b>A. No.</b></p> <p>22 Q. How do you know that?</p> <p>23 <b>A. Through the passage of time. Obviously, Tinsley was</b></p> <p>24 <b>opened before Brook House. I went to Tinsley</b></p> <p>25 <b>subsequently and we found out from detained people and</b></p> <p style="text-align: center;">Page 59</p>
<p>1 company to advertise working at Brook House as, "This is</p> <p>2 a rotten place to come. The detainees are awful and</p> <p>3 it's going to be a terrible shock because they're going</p> <p>4 to be abusive to you". So, presumably, it was just</p> <p>5 a fairly mundane advertisement inviting people to apply</p> <p>6 for, what, jobs as DCOs and DCMs?</p> <p>7 <b>A. I think it was just DCOs.</b></p> <p>8 Q. Did you start life there as a DCO, then, and get</p> <p>9 promoted?</p> <p>10 <b>A. I applied and got the DCO position and, in between then</b></p> <p>11 <b>and the centre opening, the advertisement for DCMs came</b></p> <p>12 <b>up and I applied.</b></p> <p>13 Q. So that we understand it, did you go straight in as</p> <p>14 a DCM?</p> <p>15 <b>A. Yes.</b></p> <p>16 Q. What was the fundamental difference between working</p> <p>17 there as a DCO and as a DCM? What was it that gave you</p> <p>18 managerial status rather than officer status?</p> <p>19 <b>A. I'm not quite sure what you mean.</b></p> <p>20 Q. Well, what was it that distinguished you to take the</p> <p>21 more senior position rather than the more junior</p> <p>22 position, when you hadn't, as it were, done the hard</p> <p>23 yards as a DCO?</p> <p>24 <b>A. I can only imagine that it was my experience as</b></p> <p>25 <b>a manager of teams and of people.</b></p> <p style="text-align: center;">Page 58</p>	<p>1 <b>staff transferring down to Brook House what Oakington --</b></p> <p>2 <b>what sort of centre it was. So it was over a period of</b></p> <p>3 <b>time that I found out that Tinsley was much calmer, and</b></p> <p>4 <b>Oakington similarly.</b></p> <p>5 Q. Calmer in what sense? What does that mean "calmer"?</p> <p>6 <b>A. Less incidences of violence, abuse, much less recourse</b></p> <p>7 <b>to use of force. I think the profile of a detained</b></p> <p>8 <b>person was different in these centres.</b></p> <p>9 Q. By which you mean?</p> <p>10 <b>A. Well, Tinsley, for example, I don't think sex offenders</b></p> <p>11 <b>can go to Tinsley House because they sometimes have</b></p> <p>12 <b>families, for example.</b></p> <p>13 Q. What about Oakington? These were presumably rumours you</p> <p>14 were picking up from others who had experience of these</p> <p>15 places?</p> <p>16 <b>A. One of our managers, Jules --</b></p> <p>17 Q. Jules Williams?</p> <p>18 <b>A. Yes, came from Oakington, and he told us quite a bit</b></p> <p>19 <b>about what life was like at Oakington.</b></p> <p>20 Q. Where is Oakington? Or was Oakington?</p> <p>21 <b>A. I think it's up near -- in Cambridgeshire.</b></p> <p>22 Q. While we have Jules Williams in mind, he was the</p> <p>23 residential manager?</p> <p>24 <b>A. That's right.</b></p> <p>25 Q. Were you close to him?</p> <p style="text-align: center;">Page 60</p>

<p>1 <b>A. Not really, no.</b></p> <p>2 Q. Were others close to him?</p> <p>3 <b>A. He had his own set of DCMs which he managed.</b></p> <p>4 Q. "Managed" in a professional way or they were his close</p> <p>5 chums?</p> <p>6 <b>A. From what I saw, professional.</b></p> <p>7 Q. Were there any cliques?</p> <p>8 <b>A. There were groups of friends, but I wouldn't say</b></p> <p>9 <b>cliques, no.</b></p> <p>10 Q. It may be a use of language, Mr Donnelly, but just think</p> <p>11 about Jules Williams for the moment. Did he have people</p> <p>12 who were part of a group who were particularly close to</p> <p>13 him, like Nathan Ring, perhaps, and one or two others?</p> <p>14 <b>A. Not that I'm aware of, no.</b></p> <p>15 Q. Did -- carry on.</p> <p>16 <b>A. Sorry. I wasn't aware of any specific friendship</b></p> <p>17 <b>between them.</b></p> <p>18 Q. So whether we call it friendships, groups or cliques, so</p> <p>19 that we understand it, in all the time that you were</p> <p>20 there, up to and including the end of August 2017, and</p> <p>21 you were there from March 2009, you were completely</p> <p>22 unaware, so that we understand your evidence, of any</p> <p>23 groups, cliques, personal relationships, which impacted</p> <p>24 on the professionalism of the individuals who worked</p> <p>25 there?</p> <p style="text-align: right;">Page 61</p>	<p>1 Have you changed your mind about that, Mr Donnelly?</p> <p>2 <b>A. No.</b></p> <p>3 Q. I take it you've seen Panorama?</p> <p>4 <b>A. Yes.</b></p> <p>5 Q. And nothing you saw there makes you change your mind</p> <p>6 about what you say here?</p> <p>7 <b>A. The vast majority, I still believe, are decent, ordinary</b></p> <p>8 <b>people.</b></p> <p>9 Q. Obviously, you don't use the words "vast majority" in</p> <p>10 this sentence, but is that, having seen Panorama, what</p> <p>11 you now think?</p> <p>12 <b>A. Some of them were shown to be not --</b></p> <p>13 Q. Yes.</p> <p>14 <b>A. -- very decent.</b></p> <p>15 Q. Who do you have in mind?</p> <p>16 <b>A. Yan, John Connolly.</b></p> <p>17 Q. Is it Pascali or Paschali?</p> <p>18 <b>A. Pascali, I think.</b></p> <p>19 Q. So Yan, John Connolly. Who else?</p> <p>20 <b>A. Nathan Ring. Some of the others -- I can't quite</b></p> <p>21 <b>remember the names.</b></p> <p>22 Q. You say:</p> <p>23 "Within my own work group, Oscar 1 and DCMs, we</p> <p>24 would all endeavour to work co-operatively and help each</p> <p>25 other in difficult situations and share workloads. This</p> <p style="text-align: right;">Page 63</p>
<p>1 <b>A. I would say so, yes.</b></p> <p>2 Q. You were totally unaware, hadn't heard about it, hadn't</p> <p>3 seen it for yourself, or anything like that?</p> <p>4 <b>A. Not that impacted any -- the performance of the managers</b></p> <p>5 <b>in question, no.</b></p> <p>6 Q. Can we just have a look at what you say about culture at</p> <p>7 Brook House. If you have your statement open, you will</p> <p>8 find it at paragraph 7. That's your first statement:</p> <p>9 "As far as 'culture' at Brook House is concerned,</p> <p>10 I would characterise it as co-operative ..."</p> <p>11 Do you still agree with that word "co-operative"?</p> <p>12 <b>A. Yes.</b></p> <p>13 Q. "... working together as a team in the face of sometimes</p> <p>14 horrendous abuse and violence from some detainees."</p> <p>15 So that we are clear about what you are saying here,</p> <p>16 the abuse and the violence is from whom to whom?</p> <p>17 <b>A. From detained persons towards staff.</b></p> <p>18 Q. When you use the word "violence", what do you mean by</p> <p>19 "violence"?</p> <p>20 <b>A. Assaults, spitting, kicking, punching.</b></p> <p>21 Q. "The ethos", you continue, "was to try our best to care</p> <p>22 for detainees, and also to support coworkers, and try to</p> <p>23 be professional at all times. The staff and managers</p> <p>24 were all ordinary, decent people in a very challenging</p> <p>25 situation."</p> <p style="text-align: right;">Page 62</p>	<p>1 was a particular source of pride and pleasure for me and</p> <p>2 one of the best aspects of the job. The majority of</p> <p>3 detainees were also a pleasure to work with, and had</p> <p>4 positive and cordial working relationships with them,</p> <p>5 assisting many of them, particularly those in distress,</p> <p>6 through ACDT case reviews. This cooperative teamworking</p> <p>7 ethos, from my perspective, has been a constant</p> <p>8 throughout my time in Brook House."</p> <p>9 So, subject to the few qualifications which I have</p> <p>10 asked you about to what you say here at paragraph 7, do</p> <p>11 you stand by every word of this, even today?</p> <p>12 <b>A. Yes.</b></p> <p>13 Q. Let me ask you, please, about the values, as well as</p> <p>14 aspects of culture, that you mention in this statement,</p> <p>15 paragraph 10. All of your statement will be published,</p> <p>16 subject to redactions in due course, Mr Donnelly, so if</p> <p>17 I skate over anything, that means it is not going to be</p> <p>18 missed. But obviously, in the time we have, I can only</p> <p>19 take you to parts of it. But let me ask you about</p> <p>20 paragraph 10:</p> <p>21 "The values and culture of G4S at Brook House were,</p> <p>22 on the whole, professional and caring. Officers, DCMs,</p> <p>23 senior management, were genuinely interested in the</p> <p>24 welfare of detainees and staff. Protection of</p> <p>25 vulnerable detainees was, and is, taken very seriously</p> <p style="text-align: right;">Page 64</p>



<p>1 by everyone who works at Brook House. The culture and</p> <p>2 values of G4S were perfectly appropriate to the care of</p> <p>3 all detainees and, in my opinion, the care for the</p> <p>4 vulnerable through the management of ACDTs, raised</p> <p>5 concern documents, the violence reduction programme,</p> <p>6 etc, were of a high standard, and I believe this has</p> <p>7 been borne out during HMIP inspections. I personally</p> <p>8 conducted numerous ACDT case reviews daily with</p> <p>9 vulnerable detainees and had a very positive and</p> <p>10 collaborative relationship with all the RMNs [mental</p> <p>11 health nurses] and healthcare staff and I can state very</p> <p>12 strongly that the level of care for detainees was of</p> <p>13 a high standard. Attitudes towards detainees, for my</p> <p>14 own part, and from what I saw and heard from other</p> <p>15 officers, were overwhelmingly positive and professional.</p> <p>16 As I have stated before, the vast majority of detainees</p> <p>17 were polite, well behaved and staff had no issues</p> <p>18 working with them. The minority of detainees who were</p> <p>19 rude and/or violent to others, staff and detainees, were</p> <p>20 more challenging, but I have always been surprised and</p> <p>21 impressed by the resilience and professionalism of</p> <p>22 the officers at Brook House."</p> <p>23 Paragraph 11, just the first line:</p> <p>24 "I believe the culture and values were to provide</p> <p>25 a genuinely good environment for detainees and staff."</p> <p style="text-align: center;">Page 65</p>	<p>1 Q. C?</p> <p>2 <b>A. Yes.</b></p> <p>3 Q. D? E --</p> <p>4 <b>A. Mmm-hmm.</b></p> <p>5 Q. -- care and separation?</p> <p>6 <b>A. Yes.</b></p> <p>7 Q. Reception?</p> <p>8 <b>A. No.</b></p> <p>9 Q. Never reception. Activities?</p> <p>10 <b>A. No.</b></p> <p>11 Q. Any other parts of Brook House?</p> <p>12 <b>A. Visits.</b></p> <p>13 Q. Visits?</p> <p>14 <b>A. Yes.</b></p> <p>15 Q. Admin?</p> <p>16 <b>A. No.</b></p> <p>17 Q. And you were never part of the SMT?</p> <p>18 <b>A. No.</b></p> <p>19 Q. We can assume, in all of those years, Mr Donnelly, that</p> <p>20 you had walked the corridors, unlocked the rooms, done</p> <p>21 the roll counts, the food refusal lists, you had worked</p> <p>22 night shifts, day shifts, weekends, you'd done it all?</p> <p>23 <b>A. Yes.</b></p> <p>24 Q. So that we understand your position, not once -- and</p> <p>25 I don't want to put words into your mouth, but I want to</p> <p style="text-align: center;">Page 67</p>
<p>1 If that was all we had, Mr Donnelly, it painted</p> <p>2 a rather positive picture of Brook House during the time</p> <p>3 you were there, yet Panorama shows a different side to</p> <p>4 it. Do you agree?</p> <p>5 <b>A. Yes, it does.</b></p> <p>6 Q. What the inquiry might struggle to understand is why,</p> <p>7 Mr Donnelly, the picture you paint in this statement is</p> <p>8 so out of kilter to what we saw on Panorama? Can you</p> <p>9 explain it?</p> <p>10 <b>A. What I have said is how I genuinely feel about</b></p> <p>11 <b>Brook House and the environment that we worked in. What</b></p> <p>12 <b>was shown on Panorama is not something that I witnessed</b></p> <p>13 <b>in my time at Brook House.</b></p> <p>14 Q. I assume, maybe wrongly -- you tell us -- that you</p> <p>15 worked in all parts of Brook House during the time that</p> <p>16 you were there.</p> <p>17 <b>A. Yes.</b></p> <p>18 Q. I'm talking about -- forget the Serco years. I'm</p> <p>19 talking about the G4S years?</p> <p>20 <b>A. Mmm-hmm.</b></p> <p>21 Q. We can assume, can we, from your evidence, you worked on</p> <p>22 A wing?</p> <p>23 <b>A. Yes.</b></p> <p>24 Q. B wing?</p> <p>25 <b>A. Yes.</b></p> <p style="text-align: center;">Page 66</p>	<p>1 understand your position -- had you seen anything of</p> <p>2 the kind that Callum Tulley was able to covertly record?</p> <p>3 <b>A. That's right.</b></p> <p>4 Q. Not once?</p> <p>5 <b>A. No.</b></p> <p>6 Q. Ever?</p> <p>7 <b>A. No.</b></p> <p>8 Q. Not in terms of physical abuse?</p> <p>9 <b>A. No.</b></p> <p>10 Q. Not in terms of verbal abuse?</p> <p>11 <b>A. No.</b></p> <p>12 Q. Nothing? No racism? No homophobic or misogynistic</p> <p>13 language? No?</p> <p>14 <b>A. No.</b></p> <p>15 Q. Nothing?</p> <p>16 <b>A. No.</b></p> <p>17 Q. You deal with -- before I move on, you deal with -- just</p> <p>18 for completeness, you were asked about staff morale, and</p> <p>19 you deal with that at your paragraph 8 in your first</p> <p>20 witness statement. You say:</p> <p>21 "I believe that staff morale was what it usually was</p> <p>22 at Brook House; most just getting on with the job,</p> <p>23 others genuinely not happy. Staff morale is something</p> <p>24 that is always fluctuating, with the most dissatisfied</p> <p>25 people usually being the most vocal."</p> <p style="text-align: center;">Page 68</p>

<p>1 Who do you remember now as being the most</p> <p>2 dissatisfied people among your colleagues?</p> <p>3 <b>A. Nobody in particular springs to mind. Just as a general</b></p> <p>4 <b>principle, the ones who are unhappy usually are more</b></p> <p>5 <b>vocal.</b></p> <p>6 Q. Were you unhappy?</p> <p>7 <b>A. No.</b></p> <p>8 Q. Never?</p> <p>9 <b>A. Challenged, but I wouldn't say unhappy.</b></p> <p>10 Q. What about understaffing? Was that anything that ever</p> <p>11 affected your morale?</p> <p>12 <b>A. Sometimes, yes.</b></p> <p>13 Q. I will come to that in a second and we will see what you</p> <p>14 have to say about it.</p> <p>15 One of the other things that you say, and if you</p> <p>16 turn the page to page 4, paragraph 14, you talk about</p> <p>17 your duties as a DCM. You say:</p> <p>18 "As part of my DCM duties, I deal with formal</p> <p>19 detainee complaints and I have dealt with dozens over</p> <p>20 the years. These complaints have included allegations</p> <p>21 of victimisation or unfair treatment by staff. I can't</p> <p>22 recall the exact details, but after rigorous, documented</p> <p>23 investigations, I didn't uphold a single complaint.</p> <p>24 Every one of them, without exception, was entirely</p> <p>25 without merit. Other complaints, regarding missing</p> <p style="text-align: center;">Page 69</p>	<p>1 diagonally opposite, the toilet side?</p> <p>2 <b>A. It was on the same side as the toilet, so the bunk would</b></p> <p>3 <b>attach to the surrounding toilet wall.</b></p> <p>4 Q. You say a stable-type door was fitted to the toilet.</p> <p>5 Was that at the same time as those bunks were fitted?</p> <p>6 <b>A. Yes.</b></p> <p>7 Q. When you say "a stable door", was that a fixed type of</p> <p>8 door? Did it allow any privacy?</p> <p>9 <b>A. I believe it had some space at the bottom and space at</b></p> <p>10 <b>the top, but more privacy than the curtain that we used</b></p> <p>11 <b>to use.</b></p> <p>12 Q. You say, "This increased our capacity by", as you have</p> <p>13 already indicated, "60 beds, but was hardly ever used".</p> <p>14 Why?</p> <p>15 <b>A. We didn't -- well, we didn't think it was safe.</b></p> <p>16 Q. "We"? Who is "we"?</p> <p>17 <b>A. The staff.</b></p> <p>18 Q. What do you mean --</p> <p>19 <b>A. Myself and other staff.</b></p> <p>20 Q. Well, at what level? Your level, senior management, the</p> <p>21 company?</p> <p>22 <b>A. Certainly at my level and DCOs'.</b></p> <p>23 Q. Where did the order come from for these beds to be</p> <p>24 fitted -- company level or the Home Office?</p> <p>25 <b>A. I believe it was the Home Office.</b></p> <p style="text-align: center;">Page 71</p>
<p>1 property, for example, I have upheld and recommended</p> <p>2 reimbursement, but nothing regarding victimisation."</p> <p>3 Anything you want to change about that?</p> <p>4 <b>A. No.</b></p> <p>5 Q. You were asked, for the purposes of your first witness</p> <p>6 statement, to consider the layout of Brook House. There</p> <p>7 is one thing I'd like to ask you, please, which is about</p> <p>8 the addition of a third bunk. You deal with this at</p> <p>9 your paragraph 18 of your first statement. We have been</p> <p>10 told that, in May 2017, a third bunk was added to</p> <p>11 a number of the rooms. Do you remember which rooms they</p> <p>12 were?</p> <p>13 <b>A. It was --</b></p> <p>14 Q. Which wing or wings?</p> <p>15 <b>A. I think it was A, C and D wings, the ground floor rooms,</b></p> <p>16 <b>I think there was another 60 bunks put in.</b></p> <p>17 Q. Yes, 6-0. So that we understand, we have seen a few</p> <p>18 video clips of some of the rooms, but so that we</p> <p>19 understand it, whereas a room would have, ordinarily,</p> <p>20 a bed either side with a window and a sort of joined</p> <p>21 desk-type contraption under the window, and you'd have</p> <p>22 the loo on one side, where the third bed was added was</p> <p>23 as a bunk; is that correct?</p> <p>24 <b>A. That's right.</b></p> <p>25 Q. Was that on the toilet side or was it opposite,</p> <p style="text-align: center;">Page 70</p>	<p>1 Q. To increase capacity?</p> <p>2 <b>A. Yes.</b></p> <p>3 Q. Why was it a bad idea?</p> <p>4 <b>A. I had concerns that three people in one room would be</b></p> <p>5 <b>unpleasant for those involved. The top bunk, I thought</b></p> <p>6 <b>it would be unsafe getting up and getting down from it,</b></p> <p>7 <b>especially at night.</b></p> <p>8 Q. Did it have a ladder, or a ladder fixed to it?</p> <p>9 <b>A. Yes.</b></p> <p>10 Q. How much -- for those who haven't been there, how much</p> <p>11 head space would it have afforded for the person in the</p> <p>12 top bunk?</p> <p>13 <b>A. Possibly three feet, something of that order.</b></p> <p>14 Q. "Hardly ever used" suggests it was used, or they were</p> <p>15 used?</p> <p>16 <b>A. From memory, some groups of detained persons were very</b></p> <p>17 <b>eager to share three to a room, principally Chinese and</b></p> <p>18 <b>Vietnamese.</b></p> <p>19 Q. Because?</p> <p>20 <b>A. Because they'd just like that. Everybody else wasn't</b></p> <p>21 <b>keen.</b></p> <p>22 Q. So how long did this experiment last?</p> <p>23 <b>A. Several months.</b></p> <p>24 Q. Was it eventually abandoned?</p> <p>25 <b>A. Yes.</b></p> <p style="text-align: center;">Page 72</p>

<p>1 Q. Do you remember when?</p> <p>2 <b>A. Not exactly, no.</b></p> <p>3 Q. Several months?</p> <p>4 <b>A. I think, of that sort of time, yes.</b></p> <p>5 Q. You say staff -- looking at your statement again:</p> <p>6 "Staff had major concerns about 3 detainees in such</p> <p>7 a confined space, health and safety concerns about</p> <p>8 accessing the top bunk via a very small, thin ladder ...</p> <p>9 risk of serious injury if a detainee had to be removed</p> <p>10 from the top bunk using force ..."</p> <p>11 You say:</p> <p>12 "In the end, the third bunk was never used, and the</p> <p>13 idea was eventually abandoned and the extra bunk</p> <p>14 removed, quite rightly, in my opinion."</p> <p>15 So we absolutely understand what you are telling us,</p> <p>16 "hardly ever used" or "never used"?</p> <p>17 <b>A. Hardly ever used.</b></p> <p>18 Q. I asked you a little earlier about understaffing. Can</p> <p>19 we go to paragraph 40 of your first statement, please.</p> <p>20 When I say 40, we have to go to page 10 because I think</p> <p>21 the numbering went out. That's not your fault, it's the</p> <p>22 way you were asked the questions. It's 40 with</p> <p>23 a closing bracket on page 10 of your statement. You</p> <p>24 say:</p> <p>25 "The staffing levels always met the minimum contract</p> <p style="text-align: center;">Page 73</p>	<p>1 the period?</p> <p>2 <b>A. Yes.</b></p> <p>3 Q. What did that mean to you, as Oscar 1? How were the</p> <p>4 terms of the contract to be met when you were on duty?</p> <p>5 What was it you were looking out for? What was it your</p> <p>6 job to do?</p> <p>7 <b>A. Principally, that all the activity departments were</b></p> <p>8 <b>opened -- library, IT, that sort of thing; that the</b></p> <p>9 <b>visits function was operating normally, and that</b></p> <p>10 <b>reception had enough staff to process arrivals within</b></p> <p>11 <b>the time period.</b></p> <p>12 Q. What was the consequence, from your perspective, of</p> <p>13 the contract not being met?</p> <p>14 <b>A. I'm not sure what you mean.</b></p> <p>15 Q. Well, weren't there penalties --</p> <p>16 <b>A. There were financial --</b></p> <p>17 Q. -- that the Home Office could impose on the company?</p> <p>18 <b>A. Yes.</b></p> <p>19 Q. You must have known about that?</p> <p>20 <b>A. Yes.</b></p> <p>21 Q. You sound unsure?</p> <p>22 <b>A. It wasn't referred to very often, but, yes, reference</b></p> <p>23 <b>was made if the Home Office fined the company.</b></p> <p>24 Q. When you say "reference", reference by whom to whom?</p> <p>25 <b>A. From senior management to us.</b></p> <p style="text-align: center;">Page 75</p>
<p>1 standard."</p> <p>2 Just tell us what you mean by that?</p> <p>3 <b>A. Two officers to a wing and the activity functions open</b></p> <p>4 <b>and available for detained persons.</b></p> <p>5 Q. You continue by saying:</p> <p>6 "Sometimes we struggled to provide emergency</p> <p>7 escorts, bed watches ..."</p> <p>8 What do you mean by a "bed watch"?</p> <p>9 <b>A. Where a detained person is admitted to hospital and we</b></p> <p>10 <b>have to --</b></p> <p>11 Q. What, travel with them?</p> <p>12 <b>A. Yes, and stay with them.</b></p> <p>13 Q. "... but as Oscar 1, I would say that we met the</p> <p>14 contract during this period."</p> <p>15 Oscar 1, just remind us what that means, please?</p> <p>16 <b>A. Oscar 1 is the duty operations manager.</b></p> <p>17 Q. Yes.</p> <p>18 <b>A. So it's my sort of job to oversee the delivery of</b></p> <p>19 <b>the contract.</b></p> <p>20 Q. Was that your job every day of every week, or was it</p> <p>21 just you were sometimes Oscar 1?</p> <p>22 <b>A. Mostly Oscar 1. Not all the times. Occasionally, there</b></p> <p>23 <b>would be two of us in and one of us would take the</b></p> <p>24 <b>Oscar 1 role and somebody would do another role.</b></p> <p>25 Q. So your job was to make sure the contract was met during</p> <p style="text-align: center;">Page 74</p>	<p>1 Q. What did "reference" really look like? What did it</p> <p>2 mean? You know, "Chris, you've cost the company</p> <p>3 a fortune because you took your eyes off the ball"? Is</p> <p>4 that what "reference" looked like, or was "reference"</p> <p>5 a nice sitdown and saying, "The company can't afford to</p> <p>6 be fined by the Home Office for this, that or the</p> <p>7 other"? What did it look like?</p> <p>8 <b>A. It was a sitdown sort of lessons learned. "We have just</b></p> <p>9 <b>picked up this fine. How did it happen? What are we</b></p> <p>10 <b>going to do to make sure it doesn't happen again?"</b></p> <p>11 Q. To the extent that picking up penalties from the</p> <p>12 Home Office for non-compliance with aspects of the</p> <p>13 contract impacted on you, how did that impact on</p> <p>14 detainees?</p> <p>15 <b>A. They didn't get the service that they were entitled to,</b></p> <p>16 <b>basically.</b></p> <p>17 Q. What service was that?</p> <p>18 <b>A. Whether it was not having enough staff, so the IT wasn't</b></p> <p>19 <b>open or the cultural kitchen or some aspect of provision</b></p> <p>20 <b>of service didn't happen, then that would be detrimental</b></p> <p>21 <b>to their experience at Brook House.</b></p> <p>22 Q. It was pretty dismal anyway, wasn't it?</p> <p>23 <b>A. It was, to begin with. But we did make efforts,</b></p> <p>24 <b>concerted efforts, to make the place more -- a softer</b></p> <p>25 <b>environment and less daunting.</b></p> <p style="text-align: center;">Page 76</p>

<p>1 Q. If you didn't know better, you'd think it was a prison, 2 just looking at the place?</p> <p>3 <b>A. Yes.</b></p> <p>4 Q. It was modelled, as you must know, on a category B 5 prison?</p> <p>6 <b>A. That's right.</b></p> <p>7 Q. It looked like one and almost certainly felt like that?</p> <p>8 <b>A. I imagine it did.</b></p> <p>9 Q. Imagine?</p> <p>10 <b>A. Well, I haven't been a detained person, but yes --</b> 11 Q. No, but you were an officer in one.</p> <p>12 <b>A. Yes, it was very prison-like.</b></p> <p>13 Q. You say, going to the next page: 14 "To my recollection ..." 15 This is paragraph 44: 16 "... although staffing levels were 'tight', we 17 offered, by and large, the contracted level of 18 activities and services under the contract. This was 19 monitored constantly by the Home Office, and I do not 20 remember any significant discussion regarding any 21 shortfall." 22 You talked a little earlier about staff being 23 dissatisfied and staff morale. Understaffing was one of 24 the key frustrations, wasn't it? Understaffing was one 25 of the issues and one of the frustrations, presumably,</p> <p style="text-align: center;">Page 77</p>	<p>1 <b>a problem for the company. I think, as well, that we --</b> 2 <b>the DCOs were working a 46-hour week, and it just wasn't</b> 3 <b>a very attractive proposition for a lot of people.</b></p> <p>4 Q. So, what, they came and they went?</p> <p>5 <b>A. Yes.</b></p> <p>6 Q. And getting new staff was, what, problematic, or did 7 they just recruit more and they came and went as well?</p> <p>8 <b>A. That, yes.</b></p> <p>9 Q. And only the die-hards remained behind?</p> <p>10 <b>A. Yes.</b></p> <p>11 Q. You say at your paragraph 45 on page 11: 12 "I believe that the impact of perceived staff 13 shortages had a negative effect on morale for some, but 14 not all, staff." 15 You say: 16 "I have worked at Brook House since it opened and so 17 not consider that particular period as drastically worse 18 than any other period. I don't believe staff safety was 19 compromised." 20 Thinking about life now under Serco, Mr Donnelly, 21 while I have it in mind, have things improved? I mean, 22 if you want to compare your experience now with that 23 during the G4S years, is it favourable? I mean, I know 24 I'm putting you in a difficult position because you're 25 almost certainly a company man, but is it more</p> <p style="text-align: center;">Page 79</p>
<p>1 for other officers; is that right? We have heard it 2 from others in their evidence, and I'm sure we are going 3 to hear it again.</p> <p>4 <b>A. Yes.</b></p> <p>5 Q. But you don't remember any significant discussion around 6 it?</p> <p>7 <b>A. Certainly not regarding not providing the activities</b> 8 <b>under the contract. Sometimes if you had sick, then</b> 9 <b>things were quite tight.</b></p> <p>10 Q. We have heard, and we will hear again, I'm sure, about 11 roll counts, lock-ins, covering the wings, too few DCOs 12 on the wing at any given time. All of those sorts of 13 problems. And you must have been aware of that kind of 14 issue during your time there?</p> <p>15 <b>A. Mmm-hmm.</b></p> <p>16 Q. Was it a constant or do you think it was just the odd 17 rare exception?</p> <p>18 <b>A. I don't think it's constant. I think it was by</b> 19 <b>exception.</b></p> <p>20 Q. What was the problem of understaffing, from your 21 perspective? What was it -- why couldn't the company 22 recruit or why didn't they have sufficient staff to do 23 the job that they were contracted to do?</p> <p>24 <b>A. I think that the environment came as quite a major shock</b> 25 <b>to a lot of the new starters, and that retention was</b></p> <p style="text-align: center;">Page 78</p>	<p>1 favourable now?</p> <p>2 <b>A. I would say it is. The staffing profile is huge --</b> 3 <b>hugely increased from what it was at G4S. I think the</b> 4 <b>company undertook to hire an extra 180 staff from --</b></p> <p>5 Q. We are talking about Serco?</p> <p>6 <b>A. -- Serco -- from what the G4S profile was. But it was</b> 7 <b>a different contract.</b></p> <p>8 Q. A new contract.</p> <p>9 <b>A. So I would say things have improved, yes.</b></p> <p>10 Q. From your perspective, did it suit G4S to keep staff 11 numbers low? It saved the expenses bill a bit, didn't 12 it? It would have helped their profits?</p> <p>13 <b>A. I don't believe that to be the case. I think constant</b> 14 <b>recruitment is very, very expensive. So I don't think</b> 15 <b>there was any financial benefit to keeping numbers</b> 16 <b>down --</b></p> <p>17 Q. Yes.</p> <p>18 <b>A. -- at all.</b></p> <p>19 Q. Or certainly nothing you ever heard along those lines?</p> <p>20 <b>A. No.</b></p> <p>21 Q. I don't know if you watched his evidence or have read 22 any of the transcripts that are online, but 23 Callum Tulley, who gave evidence to us back in 24 late November and early December, said, in particular on 25 29 November, that it was poorly staffed, a poorly</p> <p style="text-align: center;">Page 80</p>

<p>1       staffed detention centre, and, to use his term, staffing</p> <p>2       was abysmal. Do you agree with that or disagree?</p> <p>3       <b>A. I disagree.</b></p> <p>4       Q. In what way?</p> <p>5       <b>A. I wouldn't say it was abysmal; certainly not abysmal.</b></p> <p>6       Q. How do you describe it, then?</p> <p>7       <b>A. Adequate, just.</b></p> <p>8       Q. Now, a little earlier, I was asking you about values and</p> <p>9       culture, and do you remember telling us, by reference to</p> <p>10      paragraph 10 on page 3, that the minority of detainees</p> <p>11      who were rude and/or violent to others were more</p> <p>12      challenging?</p> <p>13      <b>A. Yes.</b></p> <p>14      Q. So that we understand the picture, from your experience,</p> <p>15      it was only a minority of detainees who were rude?</p> <p>16      <b>A. Yes.</b></p> <p>17      Q. On page 12, you say:</p> <p>18      "To my recollection ..."</p> <p>19      Forgive me, paragraph 12 on page 4:</p> <p>20      "To my recollection, I cannot recall a situation</p> <p>21      regarding mistreatment of individuals or groups or</p> <p>22      allegations thereof."</p> <p>23      So you will remember I was asking you about that</p> <p>24      a little earlier, and then, if we go, please, on to</p> <p>25      page 15, just to pick up the same theme, at paragraph 77</p> <p style="text-align: center;">Page 81</p>	<p>1       Q. Have you reviewed it?</p> <p>2       <b>A. I have.</b></p> <p>3       Q. How often?</p> <p>4       <b>A. Once.</b></p> <p>5       Q. So you have seen it twice: live and a recording?</p> <p>6       <b>A. Yes.</b></p> <p>7       Q. You were asked the question, and your response is to be</p> <p>8       found at 85, of what your view was about it:</p> <p>9       "Devastatingly negative."</p> <p>10      I suppose you could say that. You were outraged;</p> <p>11      yes?</p> <p>12      <b>A. I was, and I think most of the, if not all of the, staff</b></p> <p>13      <b>at Brook House were.</b></p> <p>14      Q. Outraged by what?</p> <p>15      <b>A. Just how unfair they thought it was.</b></p> <p>16      Q. Because it was all one way?</p> <p>17      <b>A. Basically.</b></p> <p>18      Q. Unfair. Biased?</p> <p>19      <b>A. Yes.</b></p> <p>20      Q. You say:</p> <p>21      "People felt betrayed, cheated and lied to."</p> <p>22      By whom about what?</p> <p>23      <b>A. Callum Tulley.</b></p> <p>24      Q. Did you know Callum Tulley.</p> <p>25      <b>A. I'd worked with Callum Tulley, yes, all the time he was</b></p> <p style="text-align: center;">Page 83</p>
<p>1       on page 15:</p> <p>2       "I didn't witness any verbal or physical abuse of</p> <p>3       detainees by officers at Brook House. Verbal and</p> <p>4       physical abuse of officers, myself included, by</p> <p>5       detainees was a regular, if not daily, occurrence."</p> <p>6       And paragraph 78:</p> <p>7       "No, I did not."</p> <p>8       And the, "No, I did not", is a reference to the</p> <p>9       question whether you witnessed any abuse going the other</p> <p>10      way. You say:</p> <p>11      "In my experience, abuse was a one-way street:</p> <p>12      detainees, a small minority, abusing staff and others."</p> <p>13      So something you have already told us, but I want to</p> <p>14      be absolutely clear, from the perspective of</p> <p>15      Chris Donnelly, you mean what you say here, it was all</p> <p>16      a one-way street?</p> <p>17      <b>A. Yes.</b></p> <p>18      Q. Despite what we see in Panorama?</p> <p>19      <b>A. Yes.</b></p> <p>20      Q. Let me ask you about Panorama, please, because, if you</p> <p>21      go to your page 16, I want to understand your takeout</p> <p>22      from having viewed it. Did you view it on the evening</p> <p>23      it went out, which was, if my memory serves me, Monday,</p> <p>24      4 September 2017?</p> <p>25      <b>A. Yes.</b></p> <p style="text-align: center;">Page 82</p>	<p>1       <b>there.</b></p> <p>2       Q. You say:</p> <p>3       "Overwhelmingly, every staff member said it was an</p> <p>4       outrageous travesty, unfair, biased and deceitful. They</p> <p>5       did not recognise it as the place where they worked."</p> <p>6       Presumably, that final sentence applies to you as</p> <p>7       well?</p> <p>8       <b>A. Yes.</b></p> <p>9       Q. So, for you, completely unrecognisable?</p> <p>10      <b>A. Yes.</b></p> <p>11      Q. You accept that Callum Tulley didn't make it all up?</p> <p>12      <b>A. I do accept that.</b></p> <p>13      Q. And you accept that these things happened, and, for the</p> <p>14      reasons he has given us, he worked as an undercover</p> <p>15      operative for the BBC and recorded these things, and so</p> <p>16      they played out in front of a camera, and he was simply</p> <p>17      the vehicle by which that happened. So can you explain,</p> <p>18      Mr Donnelly, the rather pleasant picture you have</p> <p>19      painted for us of the Brook House you knew with the</p> <p>20      Panorama one that he recorded for us which you say you</p> <p>21      didn't? Can you explain how all of that you failed to</p> <p>22      observe?</p> <p>23      <b>A. All I can tell you is that I didn't see anything like</b></p> <p>24      <b>that that Callum Tulley recorded.</b></p> <p>25      Q. No. Either he was very lucky, in that during the period</p> <p style="text-align: center;">Page 84</p>

1 that he recorded these things, between 24 April and  
 2 around the middle of -- early/middle of July, and he was  
 3 able to capture a number of incidents, not just physical  
 4 but verbal, or they had been going on all along. Do you  
 5 agree with that? I mean, these things don't just happen  
 6 by coincidence, do they?  
 7 **A. No. What I've said, I do not recall any -- seeing**  
 8 **anything that he recorded in front of me. Never seen**  
 9 **that.**  
 10 Q. So he was just lucky?  
 11 **A. I don't know.**  
 12 Q. Now, who were the other staff who were as outraged as  
 13 you were by this travesty of a BBC broadcast? Who were  
 14 the others?  
 15 **A. Virtually everyone.**  
 16 Q. Well, that doesn't help us.  
 17 **A. Right.**  
 18 Q. Did you speak to them afterwards?  
 19 **A. Yes, it was a topic of conversation the next day,**  
 20 **certainly.**  
 21 Q. What, on phones or messaging?  
 22 **A. No, actually at work.**  
 23 Q. At work. So you all go back to work and say, "This is  
 24 all a terrible travesty. Brook House is a wonderful  
 25 place to work and look what the BBC has done". Who in

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1 about it as you were?  
 2 **A. I can't give you a specific name. I don't think any of**  
 3 **the guys that you mentioned were still there after**  
 4 **the --**  
 5 Q. True, some had left.  
 6 **A. Yeah. But it was just a general consensus amongst the**  
 7 **staff that it was -- they didn't recognise it as the**  
 8 **place where they worked.**  
 9 Q. Were you in touch with any of the people who had left?  
 10 **A. No.**  
 11 Q. I think Paschali had left by then. You're right about  
 12 that?  
 13 **A. No.**  
 14 Q. You were asked, if you look on page 16 and onwards, for  
 15 your views about individuals. I'm not going to go  
 16 through them all because they are there set out in your  
 17 statement. But can I just pick you up on a few of them.  
 18 You deal with Derek Murphy at 89(e):  
 19 "Derek Murphy ... I worked with Derek, he was one of  
 20 the DCMs I worked with."  
 21 In actual fact, you may remember, Mr Donnelly, he  
 22 wasn't a DCM until he was acting up at the end of July,  
 23 so in the period we are talking about, to the end  
 24 of August, he was only a DCM for a month. For the rest,  
 25 he was a DCO. But be that as it may, you worked with

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1 particular were the most vocal with their outrage?  
 2 **A. I don't understand what you mean.**  
 3 Q. Who were the most vocal with their outrage? Who made  
 4 the most noise about how outrageous the BBC programme  
 5 was? Who were the ones who were saying, "That's not the  
 6 Brook House we know"?  
 7 **A. Generally, everyone. Nobody in particular sticks out.**  
 8 Q. Well, who did you speak to?  
 9 **A. I go around the building, so I speak to virtually**  
 10 **everyone.**  
 11 Q. All right. Did you speak to Yan Paschali?  
 12 **A. Not that I recall, no.**  
 13 Q. So we don't know what he told you. Did you speak to  
 14 Nathan Ring?  
 15 **A. No.**  
 16 Q. Did you speak to John Connolly?  
 17 **A. No.**  
 18 Q. Derek Murphy?  
 19 **A. Not that I recall, no.**  
 20 Q. Dan Small?  
 21 **A. No.**  
 22 Q. Dan Lee?  
 23 **A. No.**  
 24 Q. And any number of others. Who, in your mind, sticks out  
 25 as somebody whom you did speak to who was as outraged

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1 him, you had no concerns, you say, about his  
 2 professionalism; is that right?  
 3 **A. Yes.**  
 4 Q. Never saw him verbally abusing anyone?  
 5 **A. No.**  
 6 Q. Never saw him physically attack anyone?  
 7 **A. No.**  
 8 Q. Or use unnecessary or excessive force in any use of  
 9 force incident?  
 10 **A. No.**  
 11 Q. This is Derek Murphy we are talking about. Big guy?  
 12 **A. Yes.**  
 13 Q. Beard?  
 14 **A. Yes.**  
 15 Q. You can't recall any instances of verbal abuse by him?  
 16 **A. No.**  
 17 Q. You worked with him, presumably?  
 18 **A. Yes.**  
 19 Q. Pretty often, one imagines?  
 20 **A. Yes.**  
 21 Q. On use of force incidents?  
 22 **A. Sometimes, yes.**  
 23 Q. And around the wings?  
 24 **A. Yes.**  
 25 Q. And on E wing?

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22 (Pages 85 to 88)

<p>1 <b>A. Yes.</b></p> <p>2 Q. You say of John Connolly:</p> <p>3 "I very seldom worked with John as he was based</p> <p>4 mostly at Tinsley House. I never had any concerns about</p> <p>5 John's professionalism ... never witnessed any verbal</p> <p>6 abuse ... [or] any physical abuse [by him]."</p> <p>7 John Connolly was a C&amp;R or use of force trainer.</p> <p>8 You clearly must have done control and restraint</p> <p>9 training --</p> <p>10 <b>A. Yes.</b></p> <p>11 Q. -- when you began and you must have done several</p> <p>12 refresher courses?</p> <p>13 <b>A. Mmm-hmm.</b></p> <p>14 Q. Did he ever train you?</p> <p>15 <b>A. I believe I have been trained by John, yes.</b></p> <p>16 Q. How did you find his training and his instruction?</p> <p>17 <b>A. Fine.</b></p> <p>18 Q. Yes?</p> <p>19 <b>A. Good.</b></p> <p>20 Q. Professional?</p> <p>21 <b>A. Yes.</b></p> <p>22 Q. Do you remember, on Panorama, that part of Panorama</p> <p>23 where he is in a stairwell where one of the detainees,</p> <p>24 D275, on 17 May, is on the netting and they are all</p> <p>25 waiting there and some of them are in riot gear and they</p> <p style="text-align: center;">Page 89</p>	<p>1 officer."</p> <p>2 What do you mean by an "E wing officer"?</p> <p>3 <b>A. That was his usual area of work, E wing.</b></p> <p>4 Q. "He was an experienced ex-HMP [Her Majesty's Prisons]</p> <p>5 officer."</p> <p>6 Pausing there, how did you know that, that he was</p> <p>7 a former prison officer?</p> <p>8 <b>A. I'm sure he mentioned it.</b></p> <p>9 Q. Did you ever pick up any stories from him about what he</p> <p>10 would do or what he got up to when he was working in the</p> <p>11 Prison Service?</p> <p>12 <b>A. Not that I recall, no.</b></p> <p>13 Q. How he would assault people?</p> <p>14 <b>A. No.</b></p> <p>15 Q. No?</p> <p>16 <b>A. No.</b></p> <p>17 Q. You continue:</p> <p>18 "I always thought he was very capable and</p> <p>19 knowledgeable."</p> <p>20 In what way was he capable and knowledgeable?</p> <p>21 <b>A. He knew a lot about regimes, how --</b></p> <p>22 Q. About, forgive me?</p> <p>23 <b>A. Regimes and how places like Brook House or an HMP</b></p> <p>24 <b>worked. In my experience, the way he dealt with</b></p> <p>25 <b>detained persons was -- well, I thought he was good with</b></p> <p style="text-align: center;">Page 91</p>
<p>1 are waiting for the Nationals to turn up. Do you</p> <p>2 remember that?</p> <p>3 <b>A. Yes.</b></p> <p>4 Q. One of the things he advises Callum Tulley to do is to</p> <p>5 say to the guy, "Listen here, nigger". Did that</p> <p>6 surprise you?</p> <p>7 <b>A. It did.</b></p> <p>8 Q. You'd never heard that word or anything like it out of</p> <p>9 his mouth before?</p> <p>10 <b>A. Never.</b></p> <p>11 Q. So, it so happens, Callum Tulley catches it for the</p> <p>12 camera on 17 May, but you'd never heard it in all the</p> <p>13 time that you had been there? Am I right in thinking</p> <p>14 Connolly had been there almost as long as you had?</p> <p>15 Although he'd worked at Tinsley House, but you'd known</p> <p>16 him, presumably?</p> <p>17 <b>A. Yes.</b></p> <p>18 Q. Or anything misogynistic from him or homophobic or</p> <p>19 nothing like that from John --</p> <p>20 <b>A. No.</b></p> <p>21 Q. Straight guy, never said anything untoward?</p> <p>22 <b>A. No.</b></p> <p>23 Q. Then on the next page, Yan Paschali, you deal with at</p> <p>24 (p):</p> <p>25 "I worked with Yan quite a lot as he was an E wing</p> <p style="text-align: center;">Page 90</p>	<p>1 <b>them.</b></p> <p>2 Q. How did his experience in the Prison Service equip him,</p> <p>3 do you think, for work in a detention centre?</p> <p>4 <b>A. I guess he wasn't easily shocked.</b></p> <p>5 Q. What about in terms of control and restraint? Do you</p> <p>6 think that impacted on the way he went about his</p> <p>7 business?</p> <p>8 <b>A. I think he was experienced.</b></p> <p>9 Q. Yes. How did he show his experience in the physical use</p> <p>10 of force?</p> <p>11 <b>A. I'm not quite sure what you mean.</b></p> <p>12 Q. Well, you say he was experienced. What I want to</p> <p>13 understand is how he demonstrated that level of</p> <p>14 experience? How did he bring his experience from the</p> <p>15 Prison Service into the detention centre? What was it</p> <p>16 he was equipped to do that others who had not had his</p> <p>17 experience were not equipped to do? What did he bring</p> <p>18 to the party, if you like?</p> <p>19 <b>A. Right. I can only say that when he did control and</b></p> <p>20 <b>restraint, his experience. I don't know what else to</b></p> <p>21 <b>say, really.</b></p> <p>22 Q. Was he better than others at doing it?</p> <p>23 <b>A. He was competent.</b></p> <p>24 Q. A physical man?</p> <p>25 <b>A. He was a big lad, yes.</b></p> <p style="text-align: center;">Page 92</p>

<p>1 Q. Did he do boxing or MMA or something like that?</p> <p>2 <b>A. I don't know.</b></p> <p>3 Q. You say:</p> <p>4 "I ... found him to be helpful and professional when</p> <p>5 dealing with detainees."</p> <p>6 So you never had any doubts or concerns about his</p> <p>7 dealings, verbal or physical, with any of the detainees</p> <p>8 at Brook House?</p> <p>9 <b>A. No.</b></p> <p>10 Q. So not verbal, not physical; again, nothing you had ever</p> <p>11 witnessed Paschali doing?</p> <p>12 <b>A. No, I thought he was -- like I said before, I always</b></p> <p>13 <b>thought he was a good officer.</b></p> <p>14 Q. Say that again?</p> <p>15 <b>A. I thought he was a good officer.</b></p> <p>16 Q. A good officer. Let's go to the final page of your</p> <p>17 statement, paragraph 90, please. I've asked you one</p> <p>18 thing on this topic but let's just, as it were, clear it</p> <p>19 out of the way for now:</p> <p>20 "Many things were changed after the programme came</p> <p>21 out. Those things were changed again when Serco took</p> <p>22 over in May 2020."</p> <p>23 First of all, to your recollection, what changed</p> <p>24 after September 2017 while G4S were still in harness?</p> <p>25 <b>A. The main thing that I remember is that the DCO contract</b></p> <p style="text-align: center;">Page 93</p>	<p>1 <b>A. Staffing is the main one that springs to mind.</b></p> <p>2 Q. Anything else?</p> <p>3 <b>A. Not that I can think.</b></p> <p>4 Q. So do we understand that there are the same sort of</p> <p>5 levels of dissatisfaction among certain staff, in terms</p> <p>6 of morale?</p> <p>7 <b>A. No, that has improved.</b></p> <p>8 Q. That has improved?</p> <p>9 <b>A. Yes.</b></p> <p>10 Q. And the culture and values of Serco against the culture</p> <p>11 of values of G4S -- the same or different?</p> <p>12 <b>A. Like I said in my statement, my understanding of</b></p> <p>13 <b>the values of G4S were about decency and providing</b></p> <p>14 <b>a good environment for the detained people and staff,</b></p> <p>15 <b>and that's obviously the same for Serco.</b></p> <p>16 Q. Obviously, times have changed. We have gone through</p> <p>17 a couple of years of a pandemic, which will have reduced</p> <p>18 the numbers at Brook House.</p> <p>19 <b>A. Mmm-hmm.</b></p> <p>20 Q. What's capacity like now?</p> <p>21 <b>A. Very low. Probably about a third of -- around about the</b></p> <p>22 <b>150 mark.</b></p> <p>23 Q. So we have to recall that, since Serco have taken over,</p> <p>24 those have been the pandemic years?</p> <p>25 <b>A. Yes.</b></p> <p style="text-align: center;">Page 95</p>
<p>1 <b>was brought down from 46 to 40 hours on the same money,</b></p> <p>2 <b>and the -- all the staff rosters were reviewed and</b></p> <p>3 <b>changed, with staff voting on them, and I think it was</b></p> <p>4 <b>a very, very positive move.</b></p> <p>5 Q. The point of bringing down the working week and the</p> <p>6 rosters, what impact was that designed to have?</p> <p>7 <b>A. To improve officers' work/life balance, I guess.</b></p> <p>8 Q. Make the job more attractive?</p> <p>9 <b>A. To make the job more attractive, to stop the turnover of</b></p> <p>10 <b>staff, to improve retention.</b></p> <p>11 Q. Did it have that impact?</p> <p>12 <b>A. I believe it did.</b></p> <p>13 Q. What else do you remember G4S changing, apart from the</p> <p>14 sweep-out of certain people, resignations and</p> <p>15 dismissals, but apart from that, what else do you</p> <p>16 remember?</p> <p>17 <b>A. Not much, to be honest.</b></p> <p>18 Q. That was September 2017. Serco -- G4S retains</p> <p>19 a contract, or at least an interim contract, until Serco</p> <p>20 come in in May 2020. So you're talking about at least</p> <p>21 two and a half years of G4S continuing in Brook House.</p> <p>22 Serco. How did they change things after the initial</p> <p>23 changes by G4S, apart from staffing, which you say is</p> <p>24 better. What else do you think is a marked improvement</p> <p>25 by Serco?</p> <p style="text-align: center;">Page 94</p>	<p>1 Q. So Serco have had to deal with a very different set of</p> <p>2 circumstances, and one which is almost certainly more</p> <p>3 favourable to them than it was to G4S during the period</p> <p>4 that they were in charge?</p> <p>5 <b>A. I think that's fair to say.</b></p> <p>6 Q. So what, to your knowledge, has been -- I don't want</p> <p>7 a precise figure, but a ballpark. What has been the</p> <p>8 maximum capacity since May 2020, do you think? Very</p> <p>9 roughly?</p> <p>10 <b>A. I think the most that we have had is probably what we</b></p> <p>11 <b>have got now, around about 150.</b></p> <p>12 Q. Which is at least a third of what Brook House was</p> <p>13 supposed to hold, I think, before the third beds went in</p> <p>14 in May 2017. What about staff numbers? What's the</p> <p>15 ratio?</p> <p>16 <b>A. What, staff to residents?</b></p> <p>17 Q. Now, yes.</p> <p>18 <b>A. I'm not sure.</b></p> <p>19 Q. Because you say it's better.</p> <p>20 <b>A. Yes.</b></p> <p>21 Q. But we have to be slightly careful because the</p> <p>22 demographics and the population is different?</p> <p>23 <b>A. That's true.</b></p> <p>24 Q. But looking at your general daily work, is your sense</p> <p>25 that, even though the capacity of the detainee</p> <p style="text-align: center;">Page 96</p>



<p>1 population is far less than it was during the period</p> <p>2 that this inquiry is examining, is, nonetheless, the</p> <p>3 staffing better pro rata than it was during that period?</p> <p>4 <b>A. Definitely.</b></p> <p>5 Q. What about the detainee population? Do they appear to</p> <p>6 you to be better disposed than they were during the</p> <p>7 period we are looking at?</p> <p>8 <b>A. Again, it's all about proportion. We have still got</b></p> <p>9 <b>some challenging guys in there, but, overall, I would</b></p> <p>10 <b>say the profile -- I would say it's probably about the</b></p> <p>11 <b>same.</b></p> <p>12 Q. Is there anything else, Mr Donnelly, that you can tell</p> <p>13 us about, in terms of Serco, that has improved, taking</p> <p>14 into account all of those factors and different</p> <p>15 circumstances. Is there anything else that you feel</p> <p>16 makes it a happier place? I accept you say it was</p> <p>17 a pretty happy place at the time under G4S, but has it</p> <p>18 improved markedly? Would those of us who might have</p> <p>19 seen it during the G4S years come back under Serco's</p> <p>20 charge and say, "This is so different. It's just</p> <p>21 unbelievable", or are we saying it's really very much</p> <p>22 the same place, with a few tweaks here and there?</p> <p>23 <b>A. Like we discussed before, the staffing is hugely</b></p> <p>24 <b>improved. A lot of the softening of the environment</b></p> <p>25 <b>happened in the G4S years. But I would say staff morale</b></p> <p style="text-align: center;">Page 97</p>	<p>1 If we can expand the top, this is the BBC incident log,</p> <p>2 Mr Donnelly, which you should have seen before. It</p> <p>3 relates to 4 July, Tuesday:</p> <p>4 "Something on the kit broke or stopped working --</p> <p>5 need to establish why.</p> <p>6 "Did manage to record though -- around lunchtime</p> <p>7 first response ran over Chris Donnelly stood with two</p> <p>8 other officers outside room peering at detainee. XXX</p> <p>9 believes must have been stood for at least one minute,</p> <p>10 maybe two. Chris D was saying 'not hung himself' when</p> <p>11 XXX could see clearly that there was a ligature around</p> <p>12 detainee's neck attached to the TV bracket. XXX cannot</p> <p>13 prove CD knew it was there but would be extreme</p> <p>14 incompetence not to see it can't believe didn't see --</p> <p>15 and two other officers too. XXX believes unlikely to</p> <p>16 kill himself (brackets made so come off wall if enough</p> <p>17 force) but Algerian detainee in question D865 (known to</p> <p>18 have committed serious crimes previously) was</p> <p>19 unconscious and could have meant to commit himself</p> <p>20 serious harm. XXX said what's that on the bracket and</p> <p>21 the CD went in and took it off."</p> <p>22 So that's a fairly contemporaneous narrative</p> <p>23 account, clearly, by Callum Tulley, to the BBC producers</p> <p>24 about what he had seen. Now let's have a look at what</p> <p>25 he said in a witness statement he made on</p> <p style="text-align: center;">Page 99</p>
<p>1 <b>has improved under Serco.</b></p> <p>2 Q. What's your job there now?</p> <p>3 <b>A. I'm still the --</b></p> <p>4 Q. Same position?</p> <p>5 <b>A. Yes.</b></p> <p>6 Q. Doing the same work, operations?</p> <p>7 <b>A. Yes.</b></p> <p>8 Q. Oscar 1, or do they have the same terminology?</p> <p>9 <b>A. Yes, we do.</b></p> <p>10 MR ALTMAN: That's all I'm going to ask you, for the most</p> <p>11 part, on the generality.</p> <p>12 Chair, it is slightly early, but I'm going to move</p> <p>13 to specifics next, and so it may be slightly early, but</p> <p>14 not very much, a good time to rise, and come back at</p> <p>15 2.00 pm.</p> <p>16 THE CHAIR: Indeed. Thank you very much. We will see you</p> <p>17 at 2.00 pm.</p> <p>18 (12.54 pm)</p> <p>19 (A short break)</p> <p>20 (2.00 pm)</p> <p>21 MR ALTMAN: Mr Donnelly, I am going to come on to some</p> <p>22 specific incidents, the first of which relates to</p> <p>23 a ciphered detained person, D865, on 4 July 2017. The</p> <p>24 first thing I want to do is ask the evidence handler to</p> <p>25 put up on screen &lt;CPS000025&gt; at page 37, tab 22, chair.</p> <p style="text-align: center;">Page 98</p>	<p>1 23 November 2017. Chair, that's tab 32. If we can take</p> <p>2 this down and if we can put up, please,</p> <p>3 &lt;SXP000120_0008&gt;.</p> <p>4 If we scroll down to about the bottom half:</p> <p>5 "On 4 July ..."</p> <p>6 This is Callum Tulley's statement to the police:</p> <p>7 "... I was working my normal 13-hour shift. At some</p> <p>8 point during the afternoon, a first response was called</p> <p>9 to a self-harming incident. I arrived after about</p> <p>10 30 seconds from when the first response was called. As</p> <p>11 I arrived, I could see three or four other DCOs stood</p> <p>12 outside the detainee's room. I knew the detainee as</p> <p>13 D865. The other DCOs were just looking at him. I could</p> <p>14 see that he had something similar to a thick lace tied</p> <p>15 around his neck. It was obvious that there was</p> <p>16 something around his neck and I could not understand why</p> <p>17 no-one else could see it. A DCM present at the time was</p> <p>18 Chris Donnelly. He was stood directly in front of me</p> <p>19 and had direct sight of D865. Donnelly said, 'there is</p> <p>20 nothing around his neck'. I could not really understand</p> <p>21 why no-one could see the ligature around his neck.</p> <p>22 I was still stood outside the room and yet I could see</p> <p>23 it clearly. I said, 'No, what's that tied around his</p> <p>24 neck'. At this point, Chris Donnelly took his fish</p> <p>25 knife from his belt and cut the ligature off. I was</p> <p style="text-align: center;">Page 100</p>

<p>1 stood about 2 metres away and could clearly see the</p> <p>2 ligature. D865 was lying on his front, head to the</p> <p>3 side, was motionless on the floor and appeared</p> <p>4 unconscious. I could see that the thick lace was tied</p> <p>5 to a TV bracket which would have been fixed to the wall</p> <p>6 around 7 feet up and would have held the TV which was</p> <p>7 also on the floor with the bracket. He tried to use the</p> <p>8 bracket to hang himself."</p> <p>9 Then he says this:</p> <p>10 "Chris Donnelly demonstrated hatred towards the</p> <p>11 detainees. I am sure he was intent on letting the</p> <p>12 detainees suffer. I would say that it was at least</p> <p>13 2 minutes between the first response being called and</p> <p>14 Chris Donnelly removing the ligature from the detainee's</p> <p>15 neck. The nurse came in soon after to check him over.</p> <p>16 At this point, D865 was sat on the bed. Nurse tried to</p> <p>17 establish why he appeared down, and Connolly just said</p> <p>18 [it should be Donnelly] 'Were you trying to kill</p> <p>19 yourself?'"</p> <p>20 So that's what Callum Tulley had to say, and he</p> <p>21 dealt with this in his evidence as well. I don't know</p> <p>22 if you have followed it, Mr Donnelly, but we can see</p> <p>23 that as well. It is tab 37, &lt;INQ000098&gt;. He dealt with</p> <p>24 this on 2 December, in the course of his evidence.</p> <p>25 First of all, at page 6. It begins at the top on</p> <p style="text-align: center;">Page 101</p>	<p>1 Q. Why didn't you know that Callum Tulley gave evidence?</p> <p>2 Had you nowhere seen any media about the fact that</p> <p>3 Callum Tulley had given evidence?</p> <p>4 <b>A. I don't -- I haven't followed it at all.</b></p> <p>5 Q. At all?</p> <p>6 <b>A. No.</b></p> <p>7 Q. So my telling you that he gave evidence to the inquiry</p> <p>8 in November and December last year, is that a complete</p> <p>9 surprise?</p> <p>10 <b>A. No.</b></p> <p>11 Q. It's not a surprise?</p> <p>12 <b>A. No.</b></p> <p>13 Q. So you did know?</p> <p>14 <b>A. I didn't know specifically that he'd given evidence, but</b></p> <p>15 <b>it's not a surprise to me that he would be called to</b></p> <p>16 <b>give evidence.</b></p> <p>17 Q. Let me be clear. When is the first time that you</p> <p>18 understood that Callum Tulley gave evidence to the</p> <p>19 inquiry? Not whether it was a surprise or not, but when</p> <p>20 is the first time that you have understood that</p> <p>21 Callum Tulley gave evidence, in fact, over four days?</p> <p>22 <b>A. I can't remember when I became aware.</b></p> <p>23 Q. But, presumably, before you are sitting there now in the</p> <p>24 witness box?</p> <p>25 <b>A. Yes.</b></p> <p style="text-align: center;">Page 103</p>
<p>1 page 6. You will see that the transcript is divided</p> <p>2 into four pages, so it is page 23 of the transcript, but</p> <p>3 page 6 of the overall document. This was me asking him</p> <p>4 questions on 2 December, asking him about the 4 July</p> <p>5 incident. You can see, and I'm not going to read it</p> <p>6 all, that this is where I started asking him questions.</p> <p>7 Mr Donnelly, have you had a chance to look at what he</p> <p>8 had to say?</p> <p>9 <b>A. No.</b></p> <p>10 Q. You know it's been available to you?</p> <p>11 <b>A. Yes.</b></p> <p>12 Q. But you've not bothered to look?</p> <p>13 <b>A. Well, I didn't know that it happened.</b></p> <p>14 Q. You didn't know that he gave evidence in November</p> <p>15 and December; is that what you mean? Or what didn't you</p> <p>16 know happened?</p> <p>17 <b>A. No, I didn't know he'd given evidence.</b></p> <p>18 Q. So my telling you, is that the first time you've</p> <p>19 understood that Callum Tulley gave evidence to the</p> <p>20 inquiry?</p> <p>21 <b>A. It doesn't surprise me, but I hadn't followed it.</b></p> <p>22 Q. It hadn't registered?</p> <p>23 <b>A. No.</b></p> <p>24 Q. All right. Why is that, do you think?</p> <p>25 <b>A. What, that I hadn't watched the ...?</b></p> <p style="text-align: center;">Page 102</p>	<p>1 Q. But you've not tried to find out what he actually said?</p> <p>2 <b>A. No.</b></p> <p>3 Q. Because?</p> <p>4 <b>A. Because I haven't followed the case at all, the inquiry,</b></p> <p>5 <b>and I've just come to give my evidence.</b></p> <p>6 Q. I get that. But don't you think that's something that</p> <p>7 you might have shown a little interest in doing? I'm</p> <p>8 just struggling to understand why you weren't, at the</p> <p>9 very least, curious to see what he'd said about you?</p> <p>10 <b>A. Well, like I said, I haven't -- didn't want to hear what</b></p> <p>11 <b>he said about anybody, so I haven't followed it.</b></p> <p>12 Q. So is it because you are angry with him and you don't</p> <p>13 want to see what he had to say?</p> <p>14 <b>A. Not especially that. I just wanted to come and give my</b></p> <p>15 <b>evidence without looking at what he said or ...</b></p> <p>16 Q. All right. Let's have a look on the next page, page 7,</p> <p>17 which is page 26, because one of the things I asked him</p> <p>18 about was whether delaying going to the aid of</p> <p>19 a detainee in these circumstances -- it is page 26. In</p> <p>20 bold:</p> <p>21 "Answer: I wouldn't say this was widespread.</p> <p>22 I mean, most staff at Brook House when faced with</p> <p>23 a detainee with a ligature around his neck who has</p> <p>24 either fallen to the ground or was swinging from</p> <p>25 a banister or bracket, or whatever it was, would make</p> <p style="text-align: center;">Page 104</p>

<p>1 every effort to preserve life. This was just</p> <p>2 a particularly sickening incident in which DCM ..."</p> <p>3 He meant Donnelly:</p> <p>4 "... appeared to be intent on allowing the detainee</p> <p>5 to suffer."</p> <p>6 I take it you don't agree with that?</p> <p>7 <b>A. No, I don't.</b></p> <p>8 Q. Can you think of any reason why Callum Tulley might have</p> <p>9 said that?</p> <p>10 <b>A. Not really, no.</b></p> <p>11 Q. Either he's made it up, for reasons of his own, or that</p> <p>12 was his honest, general appraisal of you as a person.</p> <p>13 Which would you say it is?</p> <p>14 <b>A. I can't really put my mind in his mind. If he thinks --</b></p> <p>15 <b>if that's his genuine opinion of me as a person, that</b></p> <p>16 <b>I'd deliberately let somebody suffer, then he's</b></p> <p>17 <b>mistaken.</b></p> <p>18 Q. Mistaken. Let's actually look at the transcript of</p> <p>19 these events, which, as I say, took place on 4 July. We</p> <p>20 can take that down, thank you, and put up the transcript</p> <p>21 &lt;TRN0000033&gt;. Chair, tab 39. The second page, please.</p> <p>22 This is a transcript of the events. This is</p> <p>23 a transcript taken from Callum Tulley's recording of</p> <p>24 these events. Do you see, at line 21, he says:</p> <p>25 "Has he tied something to the ...?"</p> <p style="text-align: center;">Page 105</p>	<p>1 <b>immediately.</b></p> <p>2 Q. Immediately. Because what Callum Tulley was telling the</p> <p>3 police and the impact, or the import, of what he is</p> <p>4 saying is that it was pointed out to you but you</p> <p>5 deliberately delayed going to his aid. You understand</p> <p>6 the allegation?</p> <p>7 <b>A. Yes.</b></p> <p>8 Q. It is a serious allegation?</p> <p>9 <b>A. Yes.</b></p> <p>10 Q. But you say, "Callum Tulley is completely wrong because</p> <p>11 I, Chris Donnelly, went to his aid immediately"? Is</p> <p>12 that what you mean? There was no delay?</p> <p>13 <b>A. Yes, we went into the room, with -- me and another</b></p> <p>14 <b>officer. I assumed he was first on scene, the other</b></p> <p>15 <b>officer.</b></p> <p>16 Q. The other officer Opoku?</p> <p>17 <b>A. That's right. I hold my hands up. I should have</b></p> <p>18 <b>carried out the checks myself, but I didn't.</b></p> <p>19 Q. Yes.</p> <p>20 <b>A. Then, when Callum turned up, he pointed out that there</b></p> <p>21 <b>was a ligature around his neck, and as soon as he said,</b></p> <p>22 <b>"There is a ligature around his neck", I took my fish</b></p> <p>23 <b>knife out and removed it.</b></p> <p>24 Q. So, so that we understand from your perspective, the</p> <p>25 other officer, who was I think a DCO, Opoku, was there</p> <p style="text-align: center;">Page 107</p>
<p>1 At line 22, you say:</p> <p>2 "No. It's not round his neck."</p> <p>3 Tulley says:</p> <p>4 "No, but what's that tied around the actual</p> <p>5 bracket?"</p> <p>6 And you say:</p> <p>7 "Is he -- he's not charged [?] is he?"</p> <p>8 That may be a mistranscription. Then he offers you</p> <p>9 a fish knife. You say something inaudible, and then he</p> <p>10 says:</p> <p>11 "Here you are, use it."</p> <p>12 And then you produce a fish knife from your belt and</p> <p>13 you cut the lace, or whatever it was, from D865's neck</p> <p>14 and discard it on the ground:</p> <p>15 "That's all I need.</p> <p>16 "Oh, that will help him."</p> <p>17 A member of the medical staff is present to say:</p> <p>18 "Need to get some air in him."</p> <p>19 His allegation, Callum Tulley's allegation, is that</p> <p>20 it took you a couple of minutes for you to remove</p> <p>21 a ligature from the man's neck, even though it was</p> <p>22 pointed out to you. You accept that, don't you?</p> <p>23 <b>A. No, I don't.</b></p> <p>24 Q. You don't accept it? What don't you accept?</p> <p>25 <b>A. As soon as it was pointed out to me, I removed it</b></p> <p style="text-align: center;">Page 106</p>	<p>1 first. He points something out to you. You go into the</p> <p>2 room. Is that what we should understand?</p> <p>3 <b>A. No --</b></p> <p>4 Q. Or are you outside the room?</p> <p>5 <b>A. No, I attended, and I think Officer Opoku was already in</b></p> <p>6 <b>the room and I went into the room as well.</b></p> <p>7 Q. This was what, E wing?</p> <p>8 <b>A. I can't remember which wing it was.</b></p> <p>9 Q. Was this a vulnerable detainee?</p> <p>10 <b>A. No.</b></p> <p>11 Q. It wasn't?</p> <p>12 <b>A. It wasn't Echo wing, which is the vulnerable detainee</b></p> <p>13 <b>wing.</b></p> <p>14 Q. E wing. So you're sure he wasn't on E wing?</p> <p>15 <b>A. Yes.</b></p> <p>16 Q. And you assume he wasn't vulnerable because he wasn't on</p> <p>17 E wing?</p> <p>18 <b>A. No, I don't think I would make that assumption, no.</b></p> <p>19 Q. So are you saying that, as far as you're concerned, 865</p> <p>20 was not vulnerable?</p> <p>21 <b>A. No, I'm not saying that.</b></p> <p>22 Q. So you don't know?</p> <p>23 <b>A. All I'm saying is that I should have checked for the</b></p> <p>24 <b>ligature, and I didn't.</b></p> <p>25 Q. Yes. But I'm asking you something slightly different at</p> <p style="text-align: center;">Page 108</p>

<p>1 the moment, which is whether, at the time you went into</p> <p>2 that room, obviously somebody who makes an attempt on</p> <p>3 his own life is vulnerable --</p> <p>4 <b>A. Yes.</b></p> <p>5 Q. -- but did you know, before he did that, that that man</p> <p>6 in particular had vulnerabilities or was prone to</p> <p>7 self-harm or to commit, or attempt to commit, suicide?</p> <p>8 <b>A. I believe he was on an ACDT, so, yes, I did, yes.</b></p> <p>9 Q. Because, if Callum Tulley is right, that you</p> <p>10 deliberately delayed going to this man's aid, then</p> <p>11 you'll admit, Mr Donnelly, that it shows a certain</p> <p>12 callousness, doesn't it?</p> <p>13 <b>A. It certainly would show a degree of callousness, yes.</b></p> <p>14 Q. But you deny it?</p> <p>15 <b>A. Yes.</b></p> <p>16 Q. Can we go back to one of your witness statements, and it</p> <p>17 is the second witness statement that you made, on</p> <p>18 16 February. Do you have it in front of you,</p> <p>19 Mr Donnelly?</p> <p>20 <b>A. Yes.</b></p> <p>21 Q. What you say, at paragraph 11, on page 7 -- we don't</p> <p>22 have to put it up -- is:</p> <p>23 "I have reviewed &lt;CPS000025&gt; page 37 ..."</p> <p>24 So that was the BBC incident log:</p> <p>25 "... and &lt;SXP000120&gt; page 8. &lt;CPS000025&gt; page 37</p> <p style="text-align: center;">Page 109</p>	<p>1 judge says they will be released, then I will write</p> <p>2 a ticket and shake their hand. I believe</p> <p>3 Callum Tulley's remark comes from his preconceived</p> <p>4 political and professional agenda, and his naive</p> <p>5 misunderstanding of the environment he worked in."</p> <p>6 Do you still hold to those views, Mr Donnelly?</p> <p>7 <b>A. Yes, I do.</b></p> <p>8 Q. So you think that, although I asked you a few minutes</p> <p>9 ago why Callum Tulley, in your view, was saying this, or</p> <p>10 what the options available were, but according to this,</p> <p>11 a statement you signed off only days ago, it was all</p> <p>12 about a preconceived political and professional agenda?</p> <p>13 So, what, just making it up for his own ends?</p> <p>14 <b>A. The fact that he said that I acted out of hatred,</b></p> <p>15 <b>I believe that's the case.</b></p> <p>16 Q. "I'd further like to comment that I, unlike</p> <p>17 Callum Tulley, didn't break the law, breach my contract</p> <p>18 with my employer, deliberately refuse to follow company</p> <p>19 and Home Office policies, failing my duty of care</p> <p>20 towards detainees or betray the trust of fellow officers</p> <p>21 for financial and professional gain. I find it</p> <p>22 ridiculous that someone like Callum Tulley is asked to</p> <p>23 comment on my inner thoughts and emotions and his</p> <p>24 opinions are recorded and placed in the public domain as</p> <p>25 if they carried some credibility, which I believe, by</p> <p style="text-align: center;">Page 111</p>
<p>1 does not mention my name, or indicate I was involved."</p> <p>2 Certainly the document we have seen does mention</p> <p>3 your name, but be that as it may, at (a):</p> <p>4 "Callum Tulley states it was two minutes between the</p> <p>5 first response being called and me entering the room.</p> <p>6 He doesn't state I waited outside the room for two</p> <p>7 minutes. I wouldn't do that as Oscar 1. He does not</p> <p>8 state, and I do not recall, where in the building I was</p> <p>9 when the first response was called. I may have been at</p> <p>10 the other end of the building or in a separate building</p> <p>11 entirely. I always respond immediately to first</p> <p>12 response calls and I reject the allegation I waited</p> <p>13 outside the room. As soon as I saw the ligature, I cut</p> <p>14 it off. As I have already stated, it was an oversight</p> <p>15 that it had not been cut off sooner. I learned from</p> <p>16 this incident and it has not been repeated."</p> <p>17 And (b):</p> <p>18 "I utterly and categorically deny that I expressed</p> <p>19 hatred towards any detainee at any time at Brook House.</p> <p>20 The detainees are there for us to look after. We</p> <p>21 provide them with care. We do our best for them. If</p> <p>22 they need extra help then we provide that. We treat</p> <p>23 them with respect and we let judges decide which door of</p> <p>24 the centre they leave. If the judge says that they have</p> <p>25 to be returned, then we will facilitate that. If the</p> <p style="text-align: center;">Page 110</p>	<p>1 the end of this inquiry, it will be public knowledge</p> <p>2 that they do not. I have always acted in good faith.</p> <p>3 Callum Tulley clearly did not."</p> <p>4 You stick by those views, I assume, Mr Donnelly?</p> <p>5 <b>A. I said them, so yes.</b></p> <p>6 Q. So the picture we have is, not only from your</p> <p>7 perspective, by and large Brook House was a happy place,</p> <p>8 but the spin that the BBC, with Callum Tulley's</p> <p>9 assistance, put on Brook House was, as you said earlier,</p> <p>10 unfair, biased and, really, based on preconceptions,</p> <p>11 political ideology and all the rest of it?</p> <p>12 <b>A. Yes.</b></p> <p>13 Q. Can I show you, please, something you ought to have</p> <p>14 seen. It's at tab 19 for you, chair, and I'm going to</p> <p>15 ask for this document to go up. &lt;CJS005952&gt;. What this</p> <p>16 is, Mr Donnelly, and you should have seen it before --</p> <p>17 ordinarily, there is a photograph of you there, but it's</p> <p>18 been removed from the document and redacted out -- is</p> <p>19 G4S's investigation report. You have seen this?</p> <p>20 <b>A. Yes.</b></p> <p>21 Q. If we look on the next page, we find two allegations</p> <p>22 which were to be investigated:</p> <p>23 "BBC raised allegations which may constitute</p> <p>24 misconduct in a letter dated 24 August 2017 to G4S about</p> <p>25 DCM Donnelly's alleged involvement in the following</p> <p style="text-align: center;">Page 112</p>

<p>1 incidents ..."</p> <p>2 The first of which I will come back to is an</p> <p>3 incident on 3 July; the second of which:</p> <p>4 "On the 4th of July, after detainee D865 tried to</p> <p>5 hang himself in his room, you said [he] had not tied</p> <p>6 anything to his neck when it was apparent that the</p> <p>7 detainee had, in fact, tied a television cable around</p> <p>8 his neck and was unconscious. You did not remove the</p> <p>9 ligature around his neck until approximately two minutes</p> <p>10 after the medical emergency was announced."</p> <p>11 If we go, then, please, to page 3, at the foot of</p> <p>12 the page, allegation 2, it sets out more fully. We find</p> <p>13 the same allegations in bold type:</p> <p>14 "DCM Connolly [it says all the way through; clearly</p> <p>15 it's about you, Donnelly] confirmed he was on duty</p> <p>16 4 July 2017.</p> <p>17 "He was asked to explain the incident and the</p> <p>18 allegation made against him."</p> <p>19 Next page, please, at the top:</p> <p>20 "DCM [Donnelly] stated that he responded to a first</p> <p>21 response call on A wing."</p> <p>22 So that helps us as to where it was:</p> <p>23 "He stated he made his way from B wing to the</p> <p>24 emergency and commented that it took him about a minute</p> <p>25 to arrive.</p> <p style="text-align: center;">Page 113</p>	<p>1 preservation of life is his priority which should have</p> <p>2 included checking for ligatures.</p> <p>3 "... stated that he assumed wrongly that DCO Opoku</p> <p>4 who raised the original alarm and was first on the scene</p> <p>5 had removed the ligature.</p> <p>6 "... acknowledged there was a delay in removing the</p> <p>7 ligature and the allegation made by the BBC may be</p> <p>8 accurate."</p> <p>9 Pausing there, do you accept that the allegation</p> <p>10 that was made by Callum Tulley was, in fact, accurate?</p> <p>11 <b>A. What, that I did delay?</b></p> <p>12 Q. Yes.</p> <p>13 <b>A. Yes.</b></p> <p>14 Q. "He was very clear that there was no intent on his part</p> <p>15 to cause D865 any further harm or distress and he</p> <p>16 genuinely did not see the ligature when he arrived.</p> <p>17 "... all the relevant documentation was completed.</p> <p>18 "... stated that he has worked here a long time, he</p> <p>19 takes his job very seriously and he responds to</p> <p>20 incidents quickly and has saved many lives."</p> <p>21 Just focusing on what you said, this is clearly</p> <p>22 a summary of an interview that you had with G4S. So</p> <p>23 that we understand it, you accept, as you have just told</p> <p>24 us, there was a delay. When did the time start ticking</p> <p>25 for that delay to have occurred, from your perspective?</p> <p style="text-align: center;">Page 115</p>
<p>1 "On his arrival ... stated he observed PCO ..."</p> <p>2 Is that right or should it be "DCO"?</p> <p>3 <b>A. DCO.</b></p> <p>4 Q. "... Opoku in room A110 and the detainee was lying on</p> <p>5 his side with a television beneath his head.</p> <p>6 "DCM Donnelly stated that on his arrival he could</p> <p>7 see the detainee was breathing, semi-conscious and</p> <p>8 groaning.</p> <p>9 "Stated he was joined by other staff members</p> <p>10 responding to the incident.</p> <p>11 "... recalled someone asking him in the room if</p> <p>12 something was tied around his neck. On closer</p> <p>13 inspection, DCM [Donnelly] noticed a thin cord tied</p> <p>14 loosely around the detainee's neck.</p> <p>15 "... stated that the cord was loose enough for him</p> <p>16 to get his fingers underneath and cut the ligature off</p> <p>17 with his fish-knife. He described the ligature as</p> <p>18 a blue shoelace and not a black TV cable, commenting</p> <p>19 that a black TV cable would be more difficult to cut</p> <p>20 with a fish-knife and the shoelace cut easily and was</p> <p>21 removed quickly.</p> <p>22 "When asked about the delay ... [Donnelly]</p> <p>23 acknowledged that on arrival at the scene in the room he</p> <p>24 'missed' the ligature ... acknowledged when questioned</p> <p>25 about his training regarding first on scene that</p> <p style="text-align: center;">Page 114</p>	<p>1 When was it obvious that you should have done what you</p> <p>2 failed to do and what do you say the delay was?</p> <p>3 <b>A. I should have checked for myself the minute I arrived in</b></p> <p>4 <b>the room, and I didn't.</b></p> <p>5 Q. Yes.</p> <p>6 <b>A. As soon as Callum mentioned that there was actually</b></p> <p>7 <b>a ligature around his neck, I got my fish out --</b></p> <p>8 <b>fish knife out and removed it, but I accept that</b></p> <p>9 <b>I didn't do what I should have done.</b></p> <p>10 Q. No. Are you prepared to accept, although, of course,</p> <p>11 nobody is going to hold anybody to a precise time, that</p> <p>12 it could have been to the order of two minutes, or do</p> <p>13 you not accept that?</p> <p>14 <b>A. In the room, possibly two minutes.</b></p> <p>15 Q. So that rather suggests that what Callum Tulley had to</p> <p>16 say was accurate?</p> <p>17 <b>A. Well, I think he said that I was outside the room,</b></p> <p>18 <b>hovering outside the room.</b></p> <p>19 Q. Yes.</p> <p>20 <b>A. Which isn't accurate.</b></p> <p>21 Q. So that's the quibble is it, what you were inside or</p> <p>22 outside?</p> <p>23 <b>A. Yes.</b></p> <p>24 Q. It's not much of a quibble in the scheme of things, is</p> <p>25 it?</p> <p style="text-align: center;">Page 116</p>

<p>1 <b>A. Well, I think if I'd stayed outside the room, that would</b>  2 <b>have been even more unforgivable.</b>  3 Q. Which is better: being in the room and hanging around  4 for two minutes before you do anything, or staying  5 outside and hanging around for two minutes before doing  6 anything?  7 <b>A. Neither of them are good.</b>  8 Q. No.  9 <b>A. But certainly --</b>  10 Q. So --  11 <b>A. -- being in the room is marginally less bad than not</b>  12 <b>entering the room.</b>  13 Q. Not much between them, really, is there, Mr Donnelly?  14 <b>A. Not really, no.</b>  15 Q. Let me ask you something else. We have page 4 up.  16 Right at the top of the page, as we have it on screen,  17 the fifth paragraph down:  18 "DCM [Donnelly] recalled someone asking him in the  19 room if something was tied around his neck."  20 Who was the "someone"?  21 <b>A. I'm guessing it was Callum.</b>  22 Q. Are you guessing?  23 <b>A. I think it was Callum.</b>  24 Q. Who else was there?  25 <b>A. There were several people there.</b></p> <p style="text-align: center;">Page 117</p>	<p>1 consult with his colleague:  2 "On his return, he changed his version of events and  3 stated he did not see any ligature when he observed the  4 detainee lying on the floor.  5 "Stated he was in shock and froze and this is why he  6 took no action.  7 "... stated that when DCM [Donnelly] arrived he  8 provided no handover."  9 Although this is a summary, there is no mention of  10 Callum Tulley there either. Was there any possibility  11 you and he spoke about events afterwards?  12 <b>A. No.</b>  13 Q. No. A bit of a curiosity here that Opoku says  14 originally that he saw the man lying on the floor with  15 a ligature tied around his neck and after a break  16 completely does a 180 and changes his story immediately.  17 Do you understand that, why he changed his story?  18 <b>A. I don't know why he changed his story, no.</b>  19 Q. Then over the page, please, page 6, allegation 2 was  20 substantiated. So the conclusions of G4S are:  21 "This incident was captured ... on the ... Panorama  22 programme ..."  23 Opoku raised the alarm and saw him lying on the  24 floor and failed to render immediate first aid and  25 remove the ligature and Opoku waited for the first</p> <p style="text-align: center;">Page 119</p>
<p>1 Q. You see, by this time, you knew what the allegation was,  2 and you knew that it was Callum Tulley who was alleging  3 that you had delayed. Had you deliberately just avoided  4 his name? Rather than say Callum Tulley asked you in  5 the room if something was tied around this man's neck --  6 I'm just interested why it was "someone" rather than  7 Callum Tulley when it was obviously Callum Tulley?  8 <b>A. I really don't have an answer for that.</b>  9 Q. You don't have an answer. Let's look at what Ben Opoku  10 had to say. If we go to page 5, this is a summary of  11 what he had to tell G4S. He confirmed he raised the  12 alarm on discovery of 865 lying on the floor in his  13 room. Initially stated that he saw 865 lying on the  14 floor with a ligature tied around his neck and a TV  15 bracket had come away from the wall:  16 "When challenged ... stated that he waited at the  17 door until first responders arrived and did not render  18 first aid or remove the ligature.  19 "... stated when enough people arrived he left the  20 unit and took no further part in the management of  21 the incident.  22 "... asked about his ... responsibilities as first  23 on scene. He acknowledged that his role was to provide  24 emergency aid and preserve life."  25 Then he requested a break from the interview to</p> <p style="text-align: center;">Page 118</p>	<p>1 response to arrive and then entered the room. You see,  2 if Opoku had seen a ligature around a man's neck, which  3 was his first account, then he would have said to you  4 when he arrived, he not having done what he should have  5 done, which is to remove the ligature, he would have  6 said to you, "Chris, this man has got a ligature around  7 his neck. We need to take it off", but having changed  8 his story, having originally suggested that he saw the  9 ligature and then changed it to say he hadn't after all,  10 it rather suggests that (a) he avoids any responsibility  11 himself, but also, not having seen the ligature, avoids  12 responsibility for not giving you the information that  13 you needed. Did you two discuss this after the event?  14 <b>A. No.</b>  15 Q. Not at all?  16 <b>A. I haven't spoken to Ben. Not at all.</b>  17 Q. You never once mentioned this to him?  18 <b>A. No.</b>  19 Q. He not to you?  20 <b>A. Absolutely not, no.</b>  21 Q. "Opoku waited for the first response to arrive then  22 entered the room.  23 "DCM [Donnelly] arrived approximately 1 minute later  24 and entered the room and did not initially observe  25 a ligature tied around the neck of D865.</p> <p style="text-align: center;">Page 120</p>

<p>1 "DCM [Donnelly] was prompted by DCO Tulley who 2 arrived in the room that there may be a ligature tied 3 around his neck." 4 G4S may have put two and two together because it 5 seems you didn't mention the name Callum Tulley when you 6 spoke to them, whereas, in their conclusions in 7 substantiating the allegations against you, here we see 8 Callum Tulley's name mentioned? 9 <b>A. Mmm.</b> 10 Q. Do you understand how that happened? 11 <b>A. I'm not sure what you mean.</b> 12 Q. Well, do you agree it appears as if G4S must have 13 concluded it was only Callum Tulley who told you about 14 the ligature around the man's neck because, if Opoku was 15 telling the truth, he never saw it? 16 <b>A. Yes.</b> 17 Q. And you never saw it until you were prompted to go to 18 him and then remove it from his neck? 19 <b>A. I'm not sure why I didn't mention Callum Tulley's name,</b> 20 <b>but it was -- even on the footage, it -- I recognise</b> 21 <b>Callum Tulley's voice prompting me that there was</b> 22 <b>something around his neck.</b> 23 Q. Presumably you saw the footage, did you, before or 24 during this investigation? 25 <b>A. Yes, I think the interview was after the programme had</b></p> <p style="text-align: center;">Page 121</p>	<p>1 Now, this is an incident report that you completed; 2 is that right? You have seen this before? 3 <b>A. Yes.</b> 4 Q. We can see it is for 4 July. It was timed at 12.25. If 5 we look on page 2, is this your handwriting, 6 Mr Donnelly? 7 <b>A. It is.</b> 8 Q. This is your statement, your incident statement. It 9 reads this way -- because it is your handwriting, if 10 I get anything wrong, please correct me: 11 "I DCM Chris Donnelly was on duty at Brook House 12 IRC, Gatwick, Tuesday, 4 July 2017, as detainee custody 13 manager, Oscar 2, in charge of B wing and detainee 14 reception." 15 So on this occasion, you weren't Oscar 1, you were 16 Oscar 2, which is what, residential duties? 17 <b>A. Oscar 2 is mainly reception, overseeing reception and</b> 18 <b>visits and, I think, Bravo wing, which was the induction</b> 19 <b>wing at that time.</b> 20 Q. Well, it was supposed to be? 21 <b>A. Yes.</b> 22 Q. "At 12.25, I was on B wing when I heard an emergency 23 response call on the radio, announcing 'First response' 24 to A110. 25 "I made my way there immediately with other</p> <p style="text-align: center;">Page 123</p>
<p>1 <b>aired. I can't quite remember.</b> 2 Q. Your interview, you mean? 3 <b>A. Yes.</b> 4 Q. Yes. It would have been probably around September, 5 a couple of days after? 6 <b>A. Yes.</b> 7 Q. Most people were interviewed around 6 or 7 September, 8 I think. 9 <b>A. Mmm.</b> 10 Q. So: 11 "... [Donnelly] was prompted by DCO Tulley who 12 arrived in the room that there may be a ligature tied 13 around [his] neck. On further inspection of the neck, 14 DCM [Donnelly] observed a ligature around [the] neck and 15 immediately used his fish-knife to cut the ligature 16 away." 17 Then there is a bit more information about it. 18 Can we look, please, at another document 19 &lt;CJS004312&gt;. Can I add, I ought to say -- we don't have 20 to put it back up -- that on page 7, the conclusions of 21 G4S were that the team was satisfied you didn't act with 22 any intent to cause harm or distress. You will remember 23 that? 24 <b>A. Yes.</b> 25 Q. &lt;CJS004312&gt;. Chair, that's tab 14 for you.</p> <p style="text-align: center;">Page 122</p>	<p>1 officers. On arrival, I saw DCO B Opoku by the open 2 door of A110. Inside on the floor facedown was 3 a detainee I knew to be D865. He was lying under the 4 place where the TV should be in recovery position. The 5 TV was off the wall and he was lying facedown on top of 6 it. There was a thin blue cord like a shoelace around 7 D865's neck and attached to the TV bracket which had 8 broken off the wall. I used my fish-knife to cut the 9 ligature off from around his neck. It was tight, but 10 not so tight I could not easily get my fingers in to cut 11 it. At that point, healthcare arrived." 12 Next page, please: 13 "I could see when I cut the ligature that D865 was 14 still alive but not visibly conscious because he moved 15 and reacted when I cut the ligature but would not answer 16 or open his eyes when I called to him. After healthcare 17 had been with him several minutes, he regained 18 consciousness and got up and sat on his bed. 19 "By this time Oscar 1, DCM Loughton and A wing 20 manager DCM R Giraldo had arrived. It was agreed that 21 an ACDT would be opened by DCM Giraldo. I instructed 22 him to do so, and also that D865 should move to E wing 23 on ACDT constant supervision. 24 "When he had recovered sufficiently, I asked him if 25 he had tried to kill himself. He replied, 'I don't</p> <p style="text-align: center;">Page 124</p>

<p>1 know'.</p> <p>2 "His roommate, D1538, said when I asked him, that he</p> <p>3 had gone to the toilet, heard a loud bang, had come out</p> <p>4 of the toilet and found D865 on the floor. Just as</p> <p>5 I had described -- he then called A wing office on cell</p> <p>6 call and DCO Opoku had arrived and called first</p> <p>7 response. This ends my report."</p> <p>8 At 1.30. So the writing of this report must have</p> <p>9 taken you the better part of an hour?</p> <p>10 <b>A. Quite possibly, yes.</b></p> <p>11 Q. Is there anything that's wrong about it?</p> <p>12 <b>A. It doesn't mention that Callum Tulley had to point out</b></p> <p>13 <b>the ligature to me.</b></p> <p>14 Q. Again, we don't see the name Callum Tulley, do we?</p> <p>15 <b>A. No.</b></p> <p>16 Q. We don't see the fact that Callum Tulley drew your</p> <p>17 attention to the fact that there was a ligature around</p> <p>18 this man's neck. It doesn't draw attention to the fact</p> <p>19 that there was a delay before you attended him?</p> <p>20 <b>A. Sorry?</b></p> <p>21 Q. It doesn't draw attention to the fact that there was</p> <p>22 a delay before you attended on him. In fact, if you</p> <p>23 read this, particularly the middle or third paragraph</p> <p>24 and the fourth paragraph on page 2, which we can go back</p> <p>25 to, the green highlighted parts, "shoelace around neck</p> <p style="text-align: center;">Page 125</p>	<p>1 <b>A. Yes.</b></p> <p>2 Q. So why did you leave it out?</p> <p>3 <b>A. Probably because I didn't want to make myself look bad.</b></p> <p>4 Q. No.</p> <p>5 <b>A. And the guy -- the resident was recovered.</b></p> <p>6 Q. Yes. But for Callum Tulley recording what had happened,</p> <p>7 nobody would have been the wiser, would they?</p> <p>8 <b>A. No.</b></p> <p>9 Q. Can we think a little more about D865, because the ACDT</p> <p>10 was opened that day; is that right?</p> <p>11 <b>A. It looks that way.</b></p> <p>12 Q. Can we open it up on screen. It's &lt;CJS001034&gt;, tab 7,</p> <p>13 chair. If we scroll down to the bottom, 4 July it was</p> <p>14 opened. 2 August closed. Is that correct?</p> <p>15 <b>A. It appears to be, yes.</b></p> <p>16 Q. If we go to the next -- can we just scroll up to the top</p> <p>17 again, please. Then if we can go to the next page:</p> <p>18 "Triggers/warning signs to prompt immediate review</p> <p>19 and persons/department to be called ...</p> <p>20 "Being in detention for two years.</p> <p>21 "Possibly suffering from depression."</p> <p>22 If we scroll down, we see the date of that, 4 July,</p> <p>23 Angela O'Connor. Who was she?</p> <p>24 <b>A. She would be the ACDT assessor who asked the preliminary</b></p> <p>25 <b>questions about the background to the resident, what</b></p> <p style="text-align: center;">Page 127</p>
<p>1 attached to TV bracket which had broken off the wall.</p> <p>2 I used my fish-knife", there should be at least another</p> <p>3 paragraph in between there, shouldn't there,</p> <p>4 Mr Donnelly?</p> <p>5 <b>A. Yes, there should.</b></p> <p>6 Q. Why did you leave out information which, of course,</p> <p>7 wouldn't have made you look particularly good --</p> <p>8 "unforgivable" is your word? Why did you leave it out?</p> <p>9 <b>A. I'm not sure, to be honest.</b></p> <p>10 Q. It feels a bit like a coverup, doesn't it?</p> <p>11 <b>A. Possibly.</b></p> <p>12 Q. In the end, Mr Donnelly, nobody wants to 'fess up to</p> <p>13 omissions, mistakes, things they should have done</p> <p>14 differently or better, and certainly nobody wants to</p> <p>15 'fess up to deliberate omissions, but do you understand,</p> <p>16 in leaving out a narrative which was very important to</p> <p>17 what happened, it lends itself to the suggestion that</p> <p>18 what you had done is exactly what Callum Tulley suggests</p> <p>19 you did, which was deliberately failing to go to this</p> <p>20 man's aid? Do you understand that?</p> <p>21 <b>A. Yes, I do.</b></p> <p>22 Q. In deliberately omitting important information, if this</p> <p>23 man had died, you would be looking at the wrong end of</p> <p>24 a criminal accusation, wouldn't you, of at least</p> <p>25 perverting the course of justice, potentially?</p> <p style="text-align: center;">Page 126</p>	<p>1 <b>their current state of mind is.</b></p> <p>2 Q. If we go, then, to the next page, page 3, at the top, we</p> <p>3 see the notification form to be completed by the DCM:</p> <p>4 "Has the detainee self-harmed: yes. Tried to kill</p> <p>5 himself by hanging from the TV cables in his room."</p> <p>6 Who completed that?</p> <p>7 <b>A. I'm not sure.</b></p> <p>8 Q. I think we will find at the bottom it was Mr Giraldo.</p> <p>9 If he said that, that was wrong?</p> <p>10 <b>A. What, about trying to kill himself.</b></p> <p>11 Q. No, TV cables. Weren't we told it was a shoelace?</p> <p>12 <b>A. Yes.</b></p> <p>13 Q. "Has an incident report been completed and passed to the</p> <p>14 DD?"</p> <p>15 The DD is the duty director?</p> <p>16 <b>A. That's right.</b></p> <p>17 Q. "Awaiting completion by the DCM". That was you. And</p> <p>18 the incident report is the document I have just read</p> <p>19 from.</p> <p>20 If we go to page 10, again, Mr Giraldo, 4 July, if</p> <p>21 we go to the top. He ticks the box "Suicide attempt or</p> <p>22 statement of intent to kill self" under a "Concern and</p> <p>23 keep safe form". What is a "Concern and keep safe</p> <p>24 form"?</p> <p>25 <b>A. That's the page in the ACDT document outlining the</b></p> <p style="text-align: center;">Page 128</p>



<p>1 <b>reasons why the document was opened.</b></p> <p>2 Q. "Today at approximately 12.30 pm, D865 tried to hurt</p> <p>3 himself by hanging himself from the TV cable in his</p> <p>4 room."</p> <p>5 "Hurt himself" is probably a bit of an</p> <p>6 understatement. If we go to the next page, which is</p> <p>7 a page I think you completed, if we look to the bottom,</p> <p>8 please. Is this your document?</p> <p>9 <b>A. Yes.</b></p> <p>10 Q. And your handwriting on the same occasion, at a quarter</p> <p>11 to 1. At the top of the page:</p> <p>12 "Moved to E001 on constant supervision."</p> <p>13 By whom? Was that G4S?</p> <p>14 <b>A. Yes.</b></p> <p>15 Q. Completed 4 July.</p> <p>16 "Frequency of staff support: constant.</p> <p>17 "Phone access: Mobile in possession."</p> <p>18 So this is an immediate action plan for what, his</p> <p>19 move to E wing, and the support that would be offered to</p> <p>20 him?</p> <p>21 <b>A. The action plan is completed for every ACDT within an</b></p> <p>22 <b>hour of the document being opened.</b></p> <p>23 Q. Did you know that D865 had been on ACDT previously? On</p> <p>24 4 July, at the time that you entered that room, A110 on</p> <p>25 A wing, did you know that this man had previously been</p> <p style="text-align: center;">Page 129</p>	<p>1 harming himself or taking his own life -- he wants to</p> <p>2 see his family again. The nurse also advised him he had</p> <p>3 an appointment to see the nurse at 2.30 today. He</p> <p>4 stated that he does not have solicitor and that he is</p> <p>5 using BID and that he has not yet made a bail</p> <p>6 application through them.</p> <p>7 "All present agreed that the ACDT should remain open</p> <p>8 due to his low mood and unresolved bail issues. It was</p> <p>9 agreed, however, that the risk of self-harm was low, and</p> <p>10 that, accordingly, the observation level could be</p> <p>11 reduced."</p> <p>12 So are you prepared to accept, having seen that,</p> <p>13 Mr Donnelly, that, by the time the events of 4 July came</p> <p>14 around, you knew something about this man and knew that</p> <p>15 there were risks around his mental health?</p> <p>16 <b>A. Yes.</b></p> <p>17 Q. Of course he wasn't the only person who bore witness to</p> <p>18 what had happened, because he had a roommate, D1538. If</p> <p>19 we look at another document, chair, behind tab 21,</p> <p>20 &lt;CJS007239&gt;, and if we go, please, to page 8 at the</p> <p>21 bottom, this is 5 July.</p> <p>22 These notes, medical notes, relate to D1538, not to</p> <p>23 D865. It is 5 July, 15:20:</p> <p>24 "Surgery: Churcher [Karen Churcher, the mental</p> <p>25 health nurse]."</p> <p style="text-align: center;">Page 131</p>
<p>1 on ACDT?</p> <p>2 <b>A. I believe I did.</b></p> <p>3 Q. Let's look at the document, &lt;CJS000955&gt;, which, chair,</p> <p>4 I think you will find at tab 48. If we look at the</p> <p>5 front page, again, it relates to 865. If we scroll down</p> <p>6 to the bottom, we will see he was on ACDT between</p> <p>7 18 and 28 May. Can we go to page 20. If we look at the</p> <p>8 top, you were the case manager; yes? This was a case</p> <p>9 review document?</p> <p>10 <b>A. Yes.</b></p> <p>11 Q. Dated 22 May at 10.00 o'clock in the morning.</p> <p>12 "C Donnelly", you're the case manager. Karen Churcher</p> <p>13 is the RMN and two others, DCO and Home Office are</p> <p>14 named. The summary of the review, was this written by</p> <p>15 you, Mr Donnelly?</p> <p>16 <b>A. I think it would be, yes.</b></p> <p>17 Q. "D865 subdued at interview, appeared to be in low mood.</p> <p>18 I asked how he was feeling today, he said okay but</p> <p>19 looked down in mood. I asked him for an update on his</p> <p>20 case. He said that the Probation Service had contacted</p> <p>21 his friend outside on Friday, and that they [Probation]</p> <p>22 would be visiting the friend's property sometime this</p> <p>23 week to assess whether that address was suitable for him</p> <p>24 to be bailed there. He seemed quite upbeat about that.</p> <p>25 He reiterated when asked that he had no thoughts of</p> <p style="text-align: center;">Page 130</p>	<p>1 Top of the next page, please:</p> <p>2 "Examination: seen on wing after request from</p> <p>3 DCM Donnelly."</p> <p>4 So it was your request, was it, for D1538 to be seen</p> <p>5 by the nurse?</p> <p>6 <b>A. Yes.</b></p> <p>7 Q. Because?</p> <p>8 <b>A. Because he'd witnessed something traumatic and he might</b></p> <p>9 <b>need some assistance or be seen by a mental health</b></p> <p>10 <b>nurse.</b></p> <p>11 Q. Can you speak up a bit?</p> <p>12 <b>A. Sorry, because he'd witnessed something traumatic and he</b></p> <p>13 <b>might need some assistance.</b></p> <p>14 Q. Clearly, he was traumatised by the event. Shared</p> <p>15 a room, as this note says, "with a fellow detainee who</p> <p>16 attempted to hang himself yesterday":</p> <p>17 "States he is shaken and has recurrent thoughts and</p> <p>18 dreams about it. Is also stressed about being detained</p> <p>19 and has been placed on a raised concern."</p> <p>20 What does that mean, "a raised concern"?</p> <p>21 <b>A. It's a document that should be opened for no more than</b></p> <p>22 <b>two days. It involves regular observations by officers</b></p> <p>23 <b>and a daily review with a DCM to assess whether it needs</b></p> <p>24 <b>to -- if it can be closed or an ACDT needs to be opened.</b></p> <p>25 Q. "Had a fellow detainee in his room when visited and</p> <p style="text-align: center;">Page 132</p>

1 suggested that he ask to share with his friend. Would  
 2 like to be referred to the mental health team."  
 3 First of all, Mr Donnelly, and I'm asked in  
 4 particular to ask you these questions on behalf of  
 5 Duncan Lewis Solicitors, what training did you receive  
 6 to equip you to care for someone who had been an  
 7 eyewitness to an attempted suicide?  
 8 **A. Just the basic Safer Community training about the**  
 9 **options that are open to us. So does an ACDT need to be**  
 10 **opened --**  
 11 Q. Can you just speak up? It may be just me.  
 12 **A. Sorry. Does an ACDT need to be opened, is it a raised**  
 13 **concerns, do we need to refer him to an RMN? That's**  
 14 **basically the training that we had.**  
 15 Q. Do you think that equipped you to deal with, in  
 16 particular, D1538 and his traumatisation by what he'd  
 17 witnessed?  
 18 **A. No. That's why I referred him to a mental health**  
 19 **professional.**  
 20 Q. Do you know offhand whether there was a follow-up to his  
 21 request for mental health, a referral, as we see in this  
 22 note?  
 23 **A. I believe he was seen by the RMN.**  
 24 Q. As far as that -- what, you don't personally follow it  
 25 up? You leave it with healthcare?

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1 **A. Yes.**  
 2 Q. Do you happen to know at that time, in the G4S years,  
 3 what measures were in place across the immigration  
 4 removal centre to support detainees who witnessed  
 5 self-harm and suicide?  
 6 **A. No, I don't.**  
 7 Q. What measures are in place now at Serco?  
 8 **A. I would imagine it would be the same for any resident.**  
 9 **If there's a suspicion that they might harm themselves,**  
 10 **we'd open an ACDT. Otherwise, we might open a raised**  
 11 **concern. But we'd refer them to healthcare and if they**  
 12 **thought they needed a supported living plan, then that**  
 13 **would be opened.**  
 14 Q. So that applies now as well at Serco, does it?  
 15 **A. Yes.**  
 16 Q. A similar system or identical system?  
 17 **A. Pretty much identical.**  
 18 Q. We saw, didn't we, in the G4S investigation report that  
 19 they substantiated the allegation that you were  
 20 inappropriately slow in removing the ligature from 865's  
 21 neck on 4 July. Do you think that, having been there  
 22 all of those years, in 2017, as you were, that there was  
 23 an element of desensitisation to self-harm and attempted  
 24 suicide? In other words, was it normalised?  
 25 **A. We certainly saw a lot of it. I don't think I would**

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1 **class that as desensitised.**  
 2 Q. No? Having seen a lot of it, however you class it, do  
 3 you think it had an impact on you, how you reacted to  
 4 these things, what you thought about it?  
 5 **A. No, I honestly don't. I think, in that incident,**  
 6 **I didn't do what I should have done, but that was an**  
 7 **oversight and it's certainly not something that's**  
 8 **happened since or before.**  
 9 Q. What explains it, though?  
 10 **A. My wrong assumption that somebody else had done the**  
 11 **checks. It's as simple as that.**  
 12 Q. We know nobody else had.  
 13 **A. Yes.**  
 14 Q. And we know that Mr Opoku decided to change his mind  
 15 about what he had and hadn't seen. The moment you  
 16 entered that room and you saw what was laid out in front  
 17 of you -- a man on the ground with a television off the  
 18 wall -- you didn't need many more triggers to understand  
 19 what might have happened, did you?  
 20 **A. No.**  
 21 Q. What the inquiry would struggle to understand is why you  
 22 didn't react, given your experience?  
 23 **A. Like I said, it was an oversight. I should have --**  
 24 **I shouldn't have assumed that somebody else would have**  
 25 **done the first checks and --**

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1 Q. Well, you can only make assumptions based on what you  
 2 see around you or perhaps what you are told. Did you  
 3 make any enquiry of anybody else, whether they had  
 4 actually done the check that you, yourself, accept you  
 5 should have done?  
 6 **A. No, I didn't.**  
 7 Q. So what explains all of this, Mr Donnelly? You don't  
 8 get the information from anyone around you. Nobody says  
 9 anything to you. There's a man on the ground with  
 10 a television on the floor. And then Callum Tulley comes  
 11 along and says, "Look, there's a ligature around his  
 12 neck". Before he points that out to you and before you  
 13 actually react to it, what everybody might be struggling  
 14 to understand is why you've done nothing, and, had it  
 15 not been for Callum Tulley, who knows what the outcome  
 16 might have been. So what's the explanation?  
 17 **A. I'm not honestly sure what the explanation is.**  
 18 Q. You have had a long time to think about it.  
 19 **A. It was a wrong assumption on my part that Ben had done**  
 20 **the check. I can't say any more than that.**  
 21 Q. Were you one of those who perhaps subscribed to the idea  
 22 that self-harm and suicidal behaviour was attention  
 23 seeking or manipulation by detainees?  
 24 **A. No.**  
 25 Q. You seem hesitant?

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34 (Pages 133 to 136)

1 **A. Some residents, I would say yes.**  
 2 Q. So some residents, what you're telling us is, would,  
 3 what, use self-harm as a means of seeking attention?  
 4 **A. They would use the threat of self-harm in the belief it**  
 5 **would help their case.**  
 6 Q. How could you tell the difference between those who were  
 7 genuine and those who were simply being manipulative or  
 8 even disruptive?  
 9 **A. We always opened the ACDT anyway so that we didn't have**  
 10 **to guess.**  
 11 Q. No, but somebody could be very good at manipulation and  
 12 be manipulating every officer around him and the  
 13 healthcare team. What training did you and your brother  
 14 and sister officers have to say, "This is clearly a case  
 15 of a man who is ill", as against, "This is clearly the  
 16 case of a man who is just disruptive and not ill". How  
 17 did you know the difference? Opening an ACDT doesn't  
 18 tell you one way or the other because it's all  
 19 subjective. How did you objectively make that  
 20 determination?  
 21 **A. I wouldn't.**  
 22 Q. Who did?  
 23 **A. What we would do is open a document and, subsequent to**  
 24 **that, we'd have multi-disciplinary case reviews. We**  
 25 **would have the Home Office -- the mental health**

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1 **professionals, chaplaincy, Home Office input. So we**  
 2 **wouldn't make that determination.**  
 3 Q. One of the problems with you officers not making that  
 4 determination is, do you agree, it could be very easy to  
 5 slip into the idea that they're all attention seekers?  
 6 **A. What I would say is that we always erred on the side of**  
 7 **caution.**  
 8 Q. Which means?  
 9 **A. That we would open an ACDT document and begin that**  
 10 **process.**  
 11 Q. So you would assume, in all cases, that the man was  
 12 vulnerable and potentially mentally unwell?  
 13 **A. We would assume that if somebody says that they're going**  
 14 **to harm themselves, that they might.**  
 15 Q. In between the ACDT that was opened in respect of D865  
 16 and closed on 28 May and the one that was opened on  
 17 4 July and ultimately closed on 2 August, what was going  
 18 on in his life? How do we know, if no other ACDTs were  
 19 opened, whether this very vulnerable man was being  
 20 looked after and properly cared for?  
 21 **A. Sorry, I'm not sure.**  
 22 Q. Well, you set great store by the opening of an ACDT.  
 23 **A. Yes.**  
 24 Q. Because the idea of that is to monitor somebody who is  
 25 believed to be at risk?

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1 **A. Mmm-hmm.**  
 2 Q. In the case of D865, we have seen two ACDT forms: one  
 3 that was opened on 17 May and closed on the 28th; and  
 4 the other that was opened on 4 July, because of these  
 5 events, and ultimately closed on 2 August. What I would  
 6 like to know is, in the gap in between, assuming there  
 7 were no other ACDT forms in his case, has he been  
 8 unsupervised?  
 9 **A. He would be supervised in the same way that all the**  
 10 **residents would be supervised, that the staff would**  
 11 **interact with him, observe him --**  
 12 Q. But not in the way a mentally unwell person should be?  
 13 **A. Possibly not, no.**  
 14 Q. Well, definitely not. Because if there is no ACDT or if  
 15 he's not in E wing on constant observations, then there  
 16 is a risk that somebody like him falls through the gap,  
 17 through the crack, and then does what he does on 4 July.  
 18 That's what happened here. There must be many 865s who  
 19 came and went through Brook House who performed in  
 20 exactly the same way. Is that something you're prepared  
 21 to agree with?  
 22 **A. I'll agree it's a possibility. The ACDT is not closed**  
 23 **lightly. It's multi-disciplinary, and with the input of**  
 24 **a mental health professional. But it is possible.**  
 25 Q. Let's move on. We are going slightly backwards in time,

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1 to 13 May. But I want to ask you about another detained  
 2 person, D687. If we can please put up on screen a use  
 3 of force form, which is <CJS005652>. D687. The date is  
 4 13 May. If we go to page 15 of this document, there is  
 5 footage -- and you will have seen it, Mr Donnelly. Do  
 6 you remember, it was a detained man who was due to be  
 7 transported away from Brook House to the Verne?  
 8 **A. Yes.**  
 9 Q. He tied himself to either the cistern or a handle in  
 10 a disabled lavatory, sitting on the loo, refusing to  
 11 move, and telling you of his distress, of how long he'd  
 12 been at Brook House, that he wanted to die with his --  
 13 be buried next to his brother, and so on and so forth.  
 14 Do you remember that?  
 15 **A. Yes.**  
 16 Q. Yes, hard to forget. Here, on page 15, is your  
 17 statement within the use of force pack, annex A, and if  
 18 we can go to the bottom, please. You were the handcuff  
 19 officer --  
 20 **A. Yes.**  
 21 Q. -- according to this. If we go over the page:  
 22 "I, DCM Chris Donnelly, was on duty at Brook House  
 23 on Saturday, 13 May, Oscar 2, in charge of detainee  
 24 reception/discharge and B wing.  
 25 "At approximately 1.30, I was informed that

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35 (Pages 137 to 140)

<p>1 a detainee that I know to be 687 was in discharge</p> <p>2 waiting room toilet with a ligature around his neck. He</p> <p>3 was in the waiting room awaiting suitable crew move to</p> <p>4 the Verne IRC."</p> <p>5 Clear up a mystery, at least for me, if for no-one</p> <p>6 else. "Suitable crew", what does it actually mean?</p> <p>7 <b>A. It means that, as the contractor, we are obliged to</b></p> <p>8 <b>present the detainee under force if necessary. It just</b></p> <p>9 <b>means that there's enough officers in the escorting crew</b></p> <p>10 <b>to take him under restraint.</b></p> <p>11 Q. Right.</p> <p>12 <b>A. So it has to happen.</b></p> <p>13 Q. It's just the words "suitable crew" which seem pretty</p> <p>14 meaningless?</p> <p>15 <b>A. Yeah.</b></p> <p>16 Q. Is that a sort of --</p> <p>17 <b>A. Jargon.</b></p> <p>18 Q. -- Brook House jargon?</p> <p>19 <b>A. It's not just Brook House. It comes from the</b></p> <p>20 <b>Home Office. It's on the movement orders. It will say</b></p> <p>21 <b>"in country" or "suitable crew".</b></p> <p>22 Q. "I went to speak to him with some other officers. He</p> <p>23 was sitting on the toilet of the detainee discharge</p> <p>24 toilet with a white ligature around his neck saying he</p> <p>25 didn't want to go to the Verne. Too far away from his</p> <p style="text-align: center;">Page 141</p>	<p>1 chair, it's tab 24 and it's &lt;HOM002652&gt;. This is your</p> <p>2 account to the PSU, who were asking you about it on</p> <p>3 17 January 2018. One of the questions was, why, if you</p> <p>4 were wearing body-worn camera, you didn't activate it,</p> <p>5 and you will remember that. If you look about</p> <p>6 two-thirds of the way down -- in fact, at the bottom of</p> <p>7 the page as it is up on the screen -- as it was up on</p> <p>8 the screen -- as it is up on the screen, he said that</p> <p>9 the slings were to hold body-worn camera. In response</p> <p>10 to why there was no body-worn -- BWV, BWC, it doesn't</p> <p>11 really matter:</p> <p>12 "... given there were cameras worn by two managers</p> <p>13 and why the camera was not switched on, he had</p> <p>14 'evidently not' switched it on and he could not remember</p> <p>15 why not."</p> <p>16 What is your explanation for not switching it on?</p> <p>17 You were, at the time, a very experienced man. Why</p> <p>18 didn't you put it on?</p> <p>19 <b>A. Not experienced with body-worn cameras. I'm not sure</b></p> <p>20 <b>how long they'd been introduced. I just simply forgot</b></p> <p>21 <b>to put it on.</b></p> <p>22 Q. I mean, do you accept you weren't most directly involved</p> <p>23 in this; it was Mr Haughton who removed the ligature?</p> <p>24 Once he was, I think, taken to the ground, you applied</p> <p>25 the handcuffs. Is that right?</p> <p style="text-align: center;">Page 143</p>
<p>1 family. He wouldn't desist or remove the ligature</p> <p>2 despite several DCOs, myself and DCM [is it 'Farnell'?]</p> <p>3 trying to persuade him. Duty Director Dan Haughton</p> <p>4 arrived and after further attempts to de-escalate</p> <p>5 peacefully, Duty Director Haughton initiated</p> <p>6 a spontaneous use of force to prevent self-harm. He</p> <p>7 grabbed the ligature from 687. Other officers --</p> <p>8 DCM Farrell ..."</p> <p>9 Is it Farrell or Farnell?</p> <p>10 <b>A. Farrell.</b></p> <p>11 Q. "DCOs Martin and Tulley then controlled [687] on the</p> <p>12 floor. I made the decision that to move [687] from the</p> <p>13 area he would need to be handcuffed for his own safety</p> <p>14 and the safety of officers. I applied the ratchet cuffs</p> <p>15 to [687] when he was on the floor. He was then helped</p> <p>16 to his feet and he walked compliantly to detainee</p> <p>17 discharge to talk to waiting Tascor suitable crew.</p> <p>18 "After five to ten minutes he had de-escalated</p> <p>19 sufficiently that the Tascor crew asked for the cuffs to</p> <p>20 be removed and they accepted him into their custody."</p> <p>21 So that's what you had to say at the time, and that</p> <p>22 report presumably was written by you on the same date</p> <p>23 because it is dated 13 May.</p> <p>24 <b>A. Right.</b></p> <p>25 Q. Can we look at another document, please. For you,</p> <p style="text-align: center;">Page 142</p>	<p>1 <b>A. Yes.</b></p> <p>2 Q. So can you explain, it wasn't just one of you, it was</p> <p>3 two of you, who didn't activate -- it wasn't just you</p> <p>4 who forgot to do so, it was also Mr Farrell. Any</p> <p>5 explanation for that?</p> <p>6 <b>A. Apart from the fact that the body-worns were a fairly</b></p> <p>7 <b>new introduction to our way of life and we just weren't</b></p> <p>8 <b>in the habit of activating them.</b></p> <p>9 Q. If we go to tab 30 for you, chair, and to a different</p> <p>10 document, the investigation report, which you will have</p> <p>11 seen, into this by the PSU, &lt;HOM002725&gt;. If we go, once</p> <p>12 we get there, to page 44, please. We will see the</p> <p>13 paragraph at the bottom, 7.5.31:</p> <p>14 "The Panorama footage did not show the use of force.</p> <p>15 Officers could be heard trying to de-escalate and</p> <p>16 someone said 'Okay it's off. Right the ligature's away'</p> <p>17 soon after all the officers moved forward and the</p> <p>18 footage ended. I was satisfied the footage ended</p> <p>19 because DCO Tulley had become involved in the use of</p> <p>20 force so was unable to continue covert filming. A major</p> <p>21 concern was that two managers had body-worn cameras on</p> <p>22 but had not activated this (DCMs Donnelly and Farrell)</p> <p>23 as this would have been overwhelming evidence of events</p> <p>24 in the toilet area.</p> <p>25 "DCM Donnelly said ..."</p> <p style="text-align: center;">Page 144</p>

<p>1 This is obviously from the interview that I just 2 touched on in January 2018: 3 "... he could not remember why he had not switched 4 his on. DCM Farrell said he could not remember if he 5 had had a camera on the strap or was just wearing the 6 strap. He said the cameras were small and there had 7 only been a limited amount. He could not remember 8 switching it on. The ... policy said 'BWC shall be worn 9 at all times while the manager is on duty 24/7, unless 10 an exception is granted by the G4S duty director ... 11 staff should activate the [camera] to record all 12 contacts with detainees in the performance of official 13 duties dealing with incidents and responding to alarm 14 calls ... use of force'. If it is not activated 15 a record should be made of the reasons. A BWC recording 16 should not be made in an area where individuals have an 17 expectation of privacy, ie toilet'. 18 "None of the officers said they had not switched the 19 camera on because of the latter, so it is reasonable to 20 assume this was not a factor in their decision ..." 21 The report continues in that vein until 7.5.35: 22 "Whilst an unsatisfactory response in relation to 23 events on 13 May ... it does show these significant 24 organisational failings in respect of body-worn cameras 25 have now been addressed. It does not detract from the</p> <p style="text-align: center;">Page 145</p>	<p>1 broke, to look at the transcript, or part of 2 the transcript, of the events of 13 May. If we can put 3 up, please, &lt;TRN0000095&gt; at page 33. That's tab 36 for 4 you, chair -- oh, no, 38. If we go to the top of 5 the page, this is part of the key footage which was 6 shown on Panorama, I'm reasonably confident, and was 7 shown during an earlier part of the inquiry. You see 8 687 at the top saying: 9 "You put me in a body bag and out of here lot going 10 to take me I've explained to you bruv fuck off. 11 "I swear to God I'll let myself ... don't force me. 12 "Don't come near me bruv. Come near me and I swear 13 to God I'll, I'll let myself go. 14 "That's the only way I'm leaving this toilet bruv 15 I'm telling you this now I'm not having it: I've had 16 enough I don't want to live no more ..." 17 You'll see there is a reference to Officer 4. 18 That's you. Are you prepared to accept you were 19 Officer 4 and you were doing some of the talking here? 20 <b>A. Yes.</b> 21 <b>Q.</b> He says: 22 "The reason I given because of my mum." 23 And then Officer 4 at line 1068, being you: 24 "Then we'll wait for a minute until you pass out and 25 then we'll cut you down. Nobody is dying today."</p> <p style="text-align: center;">Page 147</p>
<p>1 fact that the report said it was used, yet none is 2 available." 3 Do you accept that you had plenty of time to 4 activate it, had you remembered to do so? 5 <b>A. Yes.</b> 6 <b>Q.</b> It was several minutes, I think, you were there before, 7 as it were, any action took place. Are you prepared to 8 accept that this was a serious failure, in the 9 circumstances? 10 <b>A. Yes, it was.</b> 11 <b>MR ALTMAN:</b> Now I'd like to take you to the transcript, 12 because I've got some other questions to ask you about 13 this. 14 Chair, Mr Livingston reminds me that it is break 15 time -- it may be his break time, anyway. Can 16 I suggest, before I move on to that, that we break for 17 15 minutes? I make it 20 past. We can come back at 25 18 to? 19 <b>THE CHAIR:</b> Yes. We can have a cup of tea, Mr Donnelly, and 20 return in 15 minutes. 21 <b>A. Thank you.</b> 22 <b>(3.20 pm)</b> 23 <b>(A short break)</b> 24 <b>(3.40 pm)</b> 25 <b>MR ALTMAN:</b> Mr Donnelly, I was inviting you, before we</p> <p style="text-align: center;">Page 146</p>	<p>1 And he says: 2 "There's no passing out bruv. I'm looking to die 3 bruv, you got to understand bruv I've had enough bruv 4 I don't want to live no more bruv." 5 We could go further through the transcript -- I'm 6 not going to in the interests of time, but you'll 7 remember I said earlier that, later on, he says he wants 8 to be buried next to his brother, he felt alienated 9 going to the Verne and, on page 11 or 12, if we were to 10 look, he talks about his mental health deteriorating. 11 Going back to the first page where we were, you will 12 remember you said: 13 "Then we'll wait for a minute until you pass out and 14 then we'll cut you down." 15 One of the things that D687 says in a statement he 16 made to the inquiry -- it's not in your bundle -- he 17 said: 18 "I remember that." 19 In other words, he remembered you saying, "We'll 20 wait for a minute until you pass out and then we'll cut 21 you down." 22 He said: 23 "It added to my feeling of worthlessness." 24 Do you accept, Mr Donnelly, that it is something 25 that you ought not to have said?</p> <p style="text-align: center;">Page 148</p>

<p>1 <b>A. Yes.</b></p> <p>2 Q. Why did you say it?</p> <p>3 <b>A. To point out the futility of him harming himself,</b></p> <p>4 <b>bearing in mind that the ligature point was a foot and</b></p> <p>5 <b>a half off the floor, so he wouldn't have been able to</b></p> <p>6 <b>harm himself, and we were all there on hand to make sure</b></p> <p>7 <b>that he didn't. I was trying to persuade him to give up</b></p> <p>8 <b>the ligature.</b></p> <p>9 Q. This was another man that you surely knew had mental</p> <p>10 health problems. In fact, you didn't need to know the</p> <p>11 history. You just needed to know this was a man sitting</p> <p>12 on a toilet with a ligature around his neck fastened to</p> <p>13 some item on the wall. That's enough information for</p> <p>14 anybody to say this man is not well, or potentially</p> <p>15 unwell, and is certainly vulnerable and is certainly</p> <p>16 upset and distressed, by the way he was speaking. You</p> <p>17 didn't need any more information than that, did you?</p> <p>18 <b>A. No.</b></p> <p>19 Q. So it was the wrong thing to say. It was certainly an</p> <p>20 unwise thing to say. Do you agree, Mr Donnelly?</p> <p>21 <b>A. On reflection, possibly, yes, but the message I wanted</b></p> <p>22 <b>to get across to him was that, "Nobody is going to die</b></p> <p>23 <b>today, you're not going to die today".</b></p> <p>24 Q. You did say that. When you look at what you said here</p> <p>25 on 13 May and when you look at 4 July, it lends itself,</p> <p style="text-align: center;">Page 149</p>	<p>1 the events of 13 May:</p> <p>2 "The use of force was 'calm, reasonable use of force</p> <p>3 and no excessive violence (no-one lost their cool). He</p> <p>4 was putting up quite a fight (lashing out with his arms</p> <p>5 and legs), so I applied the cuffs for his safety and</p> <p>6 ours'. D687 had been facedown (position for</p> <p>7 handcuffing) and his arms behind him when handcuffs were</p> <p>8 applied."</p> <p>9 Pausing there, Mr Donnelly, how do you think you</p> <p>10 forgot -- when you made the statement in your annex A on</p> <p>11 13 May, how do you think you forgot the justification</p> <p>12 for applying the handcuffs was because he was putting up</p> <p>13 quite a fight, lashing out with his arms and legs?</p> <p>14 Because it is not there, is it?</p> <p>15 <b>A. No.</b></p> <p>16 Q. How is it, by the time the PSU is interviewing you on</p> <p>17 17 January 2018, several months later, the story is</p> <p>18 embellished a little? How does that happen?</p> <p>19 <b>A. Well, I can say it's not embellished, and I don't know</b></p> <p>20 <b>why it wasn't in the original report. It was in front</b></p> <p>21 <b>of colleagues, in front of the duty director, and so it</b></p> <p>22 <b>was, in my mind, necessary to apply cuffs.</b></p> <p>23 Q. Either it's been embellished because it didn't happen,</p> <p>24 and you sought to improve your position with the PSU, or</p> <p>25 it did, and somehow you and the other officers forgot to</p> <p style="text-align: center;">Page 151</p>
<p>1 don't you think, Mr Donnelly, to the suggestion that</p> <p>2 what you said to this man on 13 May is what you actually</p> <p>3 put into practice on 4 July? Unfortunate, isn't it?</p> <p>4 <b>A. It is, yes, and that's not the case.</b></p> <p>5 Q. Can I ask you about another thing in relation to this</p> <p>6 event. We looked -- let's go back to it, please, at</p> <p>7 tab 16 for you, chair -- the use of force form,</p> <p>8 &lt;CJS005652&gt;. We looked at what you had to say at</p> <p>9 page 15 of this document about what you did and why you</p> <p>10 did it. Go to the next page, just to remind ourselves</p> <p>11 briefly.</p> <p>12 If we go to the second page, do you remember you</p> <p>13 wrote that Haughton initiated a spontaneous use of force</p> <p>14 to prevent self-harm, grabbed the ligature and Tulley</p> <p>15 and Martin and other officers controlled 687 on the</p> <p>16 floor and it was you who made the decision to move him</p> <p>17 from the area for which he would need to be handcuffed</p> <p>18 for his own safety and the safety of officers who</p> <p>19 applied the cuffs. When he was on the floor, he was</p> <p>20 then helped to his feet and you described how he, as it</p> <p>21 were, self-de-escalated.</p> <p>22 Can I ask you to look, please, again, but for</p> <p>23 a different reason, at your interview to the PSU on</p> <p>24 17 January 2018? It is tab 24, &lt;HOM002652&gt;, at page 3.</p> <p>25 Towards the top of the page, here you are talking about</p> <p style="text-align: center;">Page 150</p>	<p>1 put it in their annex As in the use of force form</p> <p>2 package. What do you think it is? Because nobody else</p> <p>3 talks about him lashing out with his arms and legs. So</p> <p>4 how do you think it comes about that, by</p> <p>5 17 January 2018, you are adding to the story?</p> <p>6 <b>A. I think it should have been in the original statement.</b></p> <p>7 <b>I don't know why it wasn't.</b></p> <p>8 Q. There is one obvious answer, Mr Donnelly: because it</p> <p>9 didn't happen that way.</p> <p>10 <b>A. I don't think that's the case.</b></p> <p>11 Q. You don't think.</p> <p>12 <b>A. No.</b></p> <p>13 Q. The reality is that he wasn't lashing out, either with</p> <p>14 his arms or with his legs, and he was, in the</p> <p>15 circumstances, fairly easily subdued, wasn't he?</p> <p>16 <b>A. I don't think so, no.</b></p> <p>17 Q. Well, we have only just read the statement that you made</p> <p>18 on the day, which rather suggests he was. I mean, you</p> <p>19 applied handcuffs for what reason? We can go back and</p> <p>20 look at what you had to say in the annex A -- at tab 16</p> <p>21 for you, chair -- &lt;CJS005652&gt; at page 16:</p> <p>22 "He was controlled on the floor. I made the</p> <p>23 decision that I move [687] from the area. He would need</p> <p>24 to be handcuffed for his own safety and the safety of</p> <p>25 officers. I applied the ratchet cuffs to him when he</p> <p style="text-align: center;">Page 152</p>

<p>1 was on the floor."</p> <p>2 I mean, if ever there was an opportunity for you to</p> <p>3 say he was thrashing around with his legs and arms, that</p> <p>4 was it, don't you think? I mean, this is when it was</p> <p>5 fresh in your memory, not January 2018?</p> <p>6 <b>A. It was implicit, not explicit and I should have made it</b></p> <p>7 <b>explicit.</b></p> <p>8 Q. Can I suggest it is not even implicit. What is explicit</p> <p>9 is it was generally for the safety of him and for the</p> <p>10 safety of you and your brother officers, but there is</p> <p>11 nothing here, you would accept, Mr Donnelly -- you can</p> <p>12 shake the page but the letters are still there. There</p> <p>13 is nothing there about legs and arms flailing or lashing</p> <p>14 around, is there?</p> <p>15 <b>A. No, there isn't.</b></p> <p>16 Q. So some listening to this may think that you have</p> <p>17 embellished your account with the PSU in January 2018 to</p> <p>18 improve your position when you were being quizzed about</p> <p>19 what happened. Is that the truth of it?</p> <p>20 <b>A. No, it's not.</b></p> <p>21 Q. You will remember the G4S investigation report, and we</p> <p>22 can go back to that, tab 19. I'm moving on to something</p> <p>23 different, Mr Donnelly. Tab 19, &lt;CJS005952&gt;. If we go</p> <p>24 to page 2, allegation 1 happened to precede the events</p> <p>25 with D865 by one day, because this is on 3 July, when</p> <p style="text-align: center;">Page 153</p>	<p>1 <b>A. They were inappropriate because we shouldn't be talking</b></p> <p>2 <b>about residents in that way.</b></p> <p>3 Q. So where do we end up with this? You said them? Do you</p> <p>4 accept you said those words? Where are we going to end</p> <p>5 up with this, Mr Donnelly: you accept you said them; you</p> <p>6 may have said them; you don't remember saying them, but</p> <p>7 you accept, if you said them, they were inappropriate?</p> <p>8 What is it?</p> <p>9 <b>A. If I said them, they were inappropriate.</b></p> <p>10 Q. If you said them?</p> <p>11 <b>A. Yeah, I don't have any recollection of saying those</b></p> <p>12 <b>words.</b></p> <p>13 Q. Because, if you did, they provide a little window into</p> <p>14 you, don't they, into what you thought about the</p> <p>15 detainees who you say you cared for?</p> <p>16 <b>A. And I do.</b></p> <p>17 Q. Yes.</p> <p>18 <b>A. On that point, the food and fluid refusal, in ACDT</b></p> <p>19 <b>reviews, if somebody is on food and fluid refusal, I'm</b></p> <p>20 <b>quite open with them, trying to encourage them to stop</b></p> <p>21 <b>it, because it's not a substitute for a legal defence.</b></p> <p>22 Q. So that rather suggests that you are prepared to accept</p> <p>23 that you may have said something like this?</p> <p>24 <b>A. I may have said it, but I don't remember saying it.</b></p> <p>25 Q. Did you think that they thought you were all as soft as</p> <p style="text-align: center;">Page 155</p>
<p>1 you said of detainees who go on hunger strike that</p> <p>2 "I don't know if these guys here have all got</p> <p>3 overprotective mums", imitated a mother feeding a baby</p> <p>4 and said, "They think we are all as soft as shite and</p> <p>5 will let them out".</p> <p>6 Can we go, please, to the next page, page 3. We</p> <p>7 will see allegation 1 is there set out in the top half,</p> <p>8 the top two-thirds of this page. About halfway down,</p> <p>9 you were asked about this allegation and initially said:</p> <p>10 "... he did not remember the incident and said it</p> <p>11 was not usually how he would talk.</p> <p>12 "When pressed further, [you] accepted that [you] may</p> <p>13 well have made these comments to ... colleagues."</p> <p>14 When asked again why, you said, "This was relating</p> <p>15 to when they misbehave, we just let them back out</p> <p>16 again". And then you acknowledged the comments were</p> <p>17 inappropriate and you appeared genuinely regretful.</p> <p>18 So we understand, Mr Donnelly, did you end up</p> <p>19 actually accepting, despite denial, that you did say</p> <p>20 these things?</p> <p>21 <b>A. I don't have any recollection of saying that, but I'm</b></p> <p>22 <b>not going to deny that I said it.</b></p> <p>23 Q. So why did you acknowledge the comments were</p> <p>24 inappropriate? What was the point in genuine regret, if</p> <p>25 you hadn't said them?</p> <p style="text-align: center;">Page 154</p>	<p>1 shite and would let them out? Is that something you</p> <p>2 said or are likely to have said?</p> <p>3 <b>A. I don't remember saying it.</b></p> <p>4 Q. Did you think food refusal was a kind of misbehaviour?</p> <p>5 <b>A. For some detainees, they did believe that it was a means</b></p> <p>6 <b>of being released from the centre.</b></p> <p>7 Q. Those were the manipulative ones, not the genuinely ill</p> <p>8 ones?</p> <p>9 <b>A. Yes.</b></p> <p>10 Q. I assume, if I was to ask you whether there was a toxic</p> <p>11 culture at Brook House during this period, it is nothing</p> <p>12 you would recognise?</p> <p>13 <b>A. I didn't find it toxic, no.</b></p> <p>14 Q. I'm going to move on now to something else that you have</p> <p>15 been asked to consider: D1853, in relation to 11 June.</p> <p>16 Now, on that occasion, you were the DCM in charge of</p> <p>17 a use of force, and we can look, please, at another use</p> <p>18 of force form. It's tab 15, chair, &lt;CJS005591&gt;. When</p> <p>19 we get there, if we go to page 22, please, this is the</p> <p>20 briefing document. If we look at the top, you will see</p> <p>21 your name, "Briefing script". It is 5.00 in the</p> <p>22 morning, 11 June:</p> <p>23 "The current situation is that detainee D1853.</p> <p>24 "Currently in B/115."</p> <p>25 So that's B wing; is that right? Room 115 in</p> <p style="text-align: center;">Page 156</p>

<p>1 B wing?</p> <p>2 <b>A. Yes.</b></p> <p>3 Q. "Has escorted removal directions to the Netherlands ..."</p> <p>4 Can you tell us what "escorted removal directions"</p> <p>5 means for anybody watching who doesn't understand the</p> <p>6 jargon. What does that mean?</p> <p>7 <b>A. It means the crew that's despatched will be on the</b></p> <p>8 <b>aeroplane with the resident and, therefore, they can</b></p> <p>9 <b>take him under restraint and, therefore, we're obliged</b></p> <p>10 <b>to present him under restraint if necessary.</b></p> <p>11 Q. And removal directions are the directions from the</p> <p>12 Home Office to remove someone from the country?</p> <p>13 <b>A. That's correct.</b></p> <p>14 Q. So he was off to the Netherlands that morning with</p> <p>15 Tascor:</p> <p>16 "After speaking with D1853 he has refused several</p> <p>17 requests to walk compliantly with us to meet with Tascor</p> <p>18 stating his solicitor has told him to stay here."</p> <p>19 Do we understand it that you had been to see him</p> <p>20 originally to tell him, "You're off to the Netherlands,</p> <p>21 you've got removal directions, will you go peacefully?"</p> <p>22 His response to you was "No" and, therefore, you decided</p> <p>23 there has to be a planned use of force in order to</p> <p>24 effect his removal to the Tascor escort?</p> <p>25 <b>A. Yes.</b></p> <p style="text-align: center;">Page 157</p>	<p>1 We were given the initial brief by ... Chris Donnelly</p> <p>2 and were informed of the situation and our roles."</p> <p>3 He talks about the role he was given, and then,</p> <p>4 a few lines down:</p> <p>5 "As DCM Donnelly asked 1853 if he was going to walk</p> <p>6 down with us, he then proceeded to say 'I've got</p> <p>7 razorblades in my mouth and I'm going to swallow them'.</p> <p>8 At no point [says White] did I see any razorblades in</p> <p>9 the mouth of the detainee when he opened it and after</p> <p>10 being asked for a second time by Donnelly we were given</p> <p>11 instructions to advance into the room."</p> <p>12 Then at the foot of the page:</p> <p>13 "He wasn't taken by the Tascor escorts due to them</p> <p>14 not having a nurse present with their escort team as he</p> <p>15 said he still had a blade in his mouth. Because of this</p> <p>16 he was placed into one of the CSU rooms at 5.16."</p> <p>17 If we look, please -- we can look at other officers.</p> <p>18 I'm not going to, in the interests of saving time. But</p> <p>19 what I will ask us all to look at is the final page of</p> <p>20 this document, page 25. This is a report written by</p> <p>21 Grace Sihlali, who I think was one of the healthcare</p> <p>22 nurses?</p> <p>23 <b>A. Yes.</b></p> <p>24 Q. In relation to this individual. It's part of her report</p> <p>25 of injury to detainee. The time and date of</p> <p style="text-align: center;">Page 159</p>
<p>1 Q. You add:</p> <p>2 "[He] has been in prison ... history of poor</p> <p>3 custodial behaviour, assaults, threats and fighting.</p> <p>4 "He has previously refused to transfer for removal</p> <p>5 directions in April [of that year].</p> <p>6 "The Plan ..."</p> <p>7 That is then set out. You will go to the room with</p> <p>8 a team of officers in full PPE. That's, what,</p> <p>9 effectively riot gear, personal protective equipment.</p> <p>10 And then you describe the entry to the room which will</p> <p>11 be facilitated by you. You will explain to him again</p> <p>12 that he has a flight that morning and you need him to</p> <p>13 get up and come with you to meet with the escorts. I'm</p> <p>14 not going to read any more of that out, at least for the</p> <p>15 moment.</p> <p>16 Then we look, please, at page 9 of this document.</p> <p>17 If we look at page 9, for example, and I'm just plucking</p> <p>18 an example, of the same document, we see the statement</p> <p>19 which was compiled by one of the DCOs, Ollie White, who</p> <p>20 was involved in the use of force. It is a bit difficult</p> <p>21 to read. I wonder if you can just expand it a smidge,</p> <p>22 please.</p> <p>23 About five lines down, he says:</p> <p>24 "We got kitted up in a team of four officers ...</p> <p>25 Jonny Martin ... Andy Simmons and ... Mohammed Shaukat.</p> <p style="text-align: center;">Page 158</p>	<p>1 examination, 11 June, at a few minutes after 5.00 in the</p> <p>2 morning:</p> <p>3 "Went to room with officers. They informed detainee</p> <p>4 that he has a flight. He stated that he has blades in</p> <p>5 his mouth. Team went in and was transferred to CSU</p> <p>6 where he was handed over to overseas."</p> <p>7 Does that mean handed over to Tascor?</p> <p>8 <b>A. Yes.</b></p> <p>9 Q. "One blade fell out from his mouth according to the team</p> <p>10 of escort. They saw one blade and was unable to take</p> <p>11 him. No medic on site with them. No injuries</p> <p>12 sustained."</p> <p>13 So that seems to have been what happened. He says</p> <p>14 he's got blades in his mouth, the use of force is</p> <p>15 executed and he's removed to the CSU, but after all, he</p> <p>16 doesn't go because Tascor weren't prepared to take him</p> <p>17 in the circumstances where he might have, and in fact</p> <p>18 did have, a razor blade or blades in his mouth; yes?</p> <p>19 First of all, a few questions, please. Had you,</p> <p>20 yourself, received training on how to respond to and</p> <p>21 de-escalate episodes such as this?</p> <p>22 <b>A. Not specifically, no.</b></p> <p>23 Q. Once he told you that he had razorblades in his mouth --</p> <p>24 these are questions I'm asked to ask you on behalf of</p> <p>25 Bhatt Murphy -- why didn't you consider that an</p> <p style="text-align: center;">Page 160</p>



1 emergency medical response was required, rather than  
2 execute the use of force plan?

3 **A. It was an escorted removal, so we were obliged to**  
4 **present him. If he had swallowed a blade, it would not**  
5 **have presented a huge medical problem. They pass**  
6 **straight through the body. So I thought it was safe to**  
7 **continue.**

8 Q. How confident can you be, Mr Donnelly, that when  
9 somebody swallows razorblades, no great injury is going  
10 to be occasioned to them?

11 **A. It's happened quite a few times.**

12 Q. How often has it happened that somebody has done  
13 themselves some serious damage?

14 **A. Never.**

15 Q. Never?

16 **A. No.**

17 Q. In your experience?

18 **A. Yes.**

19 Q. So, as far as you're concerned, the threat to swallow  
20 razorblades is an empty threat?

21 **A. Yes.**

22 Q. Why did the escort crew refuse to take him?

23 **A. Because he still had one in his mouth, which he may**  
24 **subsequently have produced on the plane and maybe**  
25 **self-harmed.**

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1 Q. What about your officers and yourself? When he tells  
2 you he's got two razorblades in his mouth and you  
3 execute the use of force plan, how did you guard against  
4 the risk, even if what you say is right, that there was  
5 no possibility of him doing any personal injury to  
6 himself, how do you guard against the risk he takes  
7 a razor blade out of his mouth and slashes one of your  
8 officers around the neck, or -- even if they're wearing  
9 a helmet, maybe not, but to an arm or to the back or to  
10 the front? How do you guard against that?

11 **A. Basically, the PPE and the training that they receive.**

12 Q. Can you speak up?

13 **A. Sorry, they were all wearing PPE.**

14 Q. Yes, I know.

15 **A. And the training they'd received, so they would enter**  
16 **the room quickly, very quickly, and take control of**  
17 **the resident.**

18 Q. You weren't wearing PPE, though, were you?

19 **A. No.**

20 Q. Do you accept, or do you not, that this was a fairly  
21 dangerous thing, to effect control and restraint removal  
22 in those circumstances?

23 **A. I don't accept that, no.**

24 Q. Did you ever feel that there was pressure on you and  
25 your officers to effect a removal at all costs, even

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1 where a detainee was telling you he had razorblades in  
2 his mouth?

3 **A. There was pressure, yes, to present residents.**

4 Q. Do you think you took risks, unnecessary risks, because  
5 of it?

6 **A. I don't feel so, no.**

7 Q. Against that, Mr Donnelly, you will have seen this  
8 footage which we have quite recently received from G4S,  
9 and I'm going to show it now, but, chair, because it's  
10 unpixelated, it's not redacted, and because it shows the  
11 detainee's face and identifies him, for that reason, I'm  
12 going to ask that the inquiry, this hearing, goes into  
13 closed session, which means, I'm afraid, that it will  
14 not be open to the public and what I am about to show  
15 will not be live streamed. Then, when it is completed,  
16 which won't take very long, we will come back into open  
17 session, and I will ask Mr Donnelly some questions about  
18 it.

19 So if somebody can tell me when we are ready to  
20 proceed.

21 (In closed session)

22 MR ALTMAN: While we are waiting, I know we may not be in  
23 public, it is just a timing issue. I'm not going to  
24 finish at 4.30. I have told those behind me I have had  
25 to cut out certain things in the interests of

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1 timekeeping, but I will finish this evening, if we sit  
2 a little longer.

3 THE CHAIR: Mr Donnelly, that will mean it will be slightly  
4 later, but it will prevent us having to call you back  
5 tomorrow morning, if I'm understanding correctly,  
6 Mr Altman. Is that the case?

7 MR ALTMAN: I hope so, yes.

8 THE CHAIR: Is that okay with you, if we continue slightly  
9 longer than 4.30?

10 **A. Yes.**

11 MR ALTMAN: Can we put up, please, footage S215002. I am  
12 not going to play a huge amount of it, but just enough  
13 for my purposes, please.

14 (Video played)

15 (In open session)

16 MR ALTMAN: Mr Donnelly, you were the manager, obviously,  
17 shown on this footage.

18 **A. Yes.**

19 Q. You were clearly supervising this use of force; yes?

20 **A. Yes.**

21 Q. As we clearly hear for ourselves, the moment the door is  
22 opened, he says, "I've got two blades in my mouth", and  
23 then obviously you order the officers in to commence the  
24 control and restraint. Again, you felt there was  
25 nothing inappropriate about it, in the circumstances?

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41 (Pages 161 to 164)

<p>1 <b>A. Yes.</b></p> <p>2 Q. That's what you are telling us. Do you remember hearing</p> <p>3 yourself saying to him, at the time that the other</p> <p>4 officers have control of him, and when he's telling you</p> <p>5 that "I've got razors in my mouth" and he screams, and</p> <p>6 we can hear some grunting, and then he says,</p> <p>7 "I swallowed a razor" and about 40 seconds in, you say,</p> <p>8 "Doesn't matter about razors, mate. Swallow as many as</p> <p>9 you want". Do you remember saying that?</p> <p>10 <b>A. Well, it's on the footage.</b></p> <p>11 Q. Why did you say that?</p> <p>12 <b>A. Just to let him know that he's not going to harm himself</b></p> <p>13 <b>by swallowing razorblades.</b></p> <p>14 Q. "Doesn't matter about razors, mate. Swallow as many as</p> <p>15 you want". So that was designed to tell him that it was</p> <p>16 open to him to swallow as many razors as he had in his</p> <p>17 mouth?</p> <p>18 <b>A. It wouldn't do him any harm, no.</b></p> <p>19 Q. Then, when he's taken down the stairs, he says, "I've</p> <p>20 got razors in my fucking mouth. See that, nurse, yeah,</p> <p>21 blood, blood. Look, fucking blood". Do you remember</p> <p>22 seeing any blood?</p> <p>23 <b>A. No.</b></p> <p>24 Q. Was he making that up?</p> <p>25 <b>A. It's the first time I've seen the footage, today.</b></p> <p style="text-align: center;">Page 165</p>	<p>1 that detainee 1853 ... in B115 had escorted removal</p> <p>2 directions to the Netherlands today, with an approximate</p> <p>3 pick-up time of 4.30. We had been informed by day staff</p> <p>4 that he had been spoken to regarding his flight and we</p> <p>5 were informed he was happy to go. He had been left on</p> <p>6 his own in room [whatever it was] as a precaution. At</p> <p>7 approximately 4.30, myself and Oscar 1 DCM Dave Aldis</p> <p>8 went to talk to him about his flight. He told us he was</p> <p>9 refusing to go on his flight. He said his solicitor had</p> <p>10 told him to refuse, as he had a good case. We explained</p> <p>11 that we had to present him to the escorts, as it was an</p> <p>12 escorted flight, due to a previous refusal of unescorted</p> <p>13 RDs."</p> <p>14 That's removal directions:</p> <p>15 "We tried at length to get D1853 to come down to</p> <p>16 talk to the escorts. He refused. We informed him that</p> <p>17 if he did not comply, force would be necessary, as it</p> <p>18 was a lawful instruction from the Home Office."</p> <p>19 Then to the next page:</p> <p>20 "He still refused. We had no option then but to</p> <p>21 assemble a team of officers in PPE for a planned use of</p> <p>22 force to present him to Tascor overseas escorts. The</p> <p>23 team was assembled ..."</p> <p>24 And you deal with that:</p> <p>25 "DCM Aldis had spoken to Tascor overseas, who said</p> <p style="text-align: center;">Page 167</p>
<p>1 <b>I didn't see any blood.</b></p> <p>2 Q. So, looking at that now, Mr Donnelly, you see nothing</p> <p>3 wrong with any of it: what you said, what you did, what</p> <p>4 you directed your officers to do?</p> <p>5 <b>A. I probably shouldn't have said, "Swallow as many as you</b></p> <p>6 <b>like".</b></p> <p>7 Q. No, "probably shouldn't have said"?</p> <p>8 <b>A. Shouldn't have said.</b></p> <p>9 Q. No.</p> <p>10 <b>A. But I think the use of force --</b></p> <p>11 Q. Can you say that again?</p> <p>12 <b>A. The use of force needed to go ahead.</b></p> <p>13 Q. Because you were under pressure or it just needed to go</p> <p>14 ahead?</p> <p>15 <b>A. Well, we were obliged to present the residents for</b></p> <p>16 <b>escorted removal.</b></p> <p>17 Q. Can we put up another document, please, &lt;HOM004424&gt;.</p> <p>18 Chair, you will find this in the final tab in the second</p> <p>19 volume.</p> <p>20 THE CHAIR: Thank you.</p> <p>21 MR ALTMAN: This is your incident report, written up by you</p> <p>22 at 5.08 that morning. If we go to the narrative account</p> <p>23 on the next page, which should be on page 3:</p> <p>24 "I, DCM Chris Donnelly, was on duty at Brook House</p> <p>25 on the 11 June night shift as Oscar 2. We were aware</p> <p style="text-align: center;">Page 166</p>	<p>1 they would take him as long as he had not started</p> <p>2 a dirty protest. They said they would accept him under</p> <p>3 restraint. I went to the door with the team behind me.</p> <p>4 I opened the door to D1853 to walk compliantly. He</p> <p>5 immediately said 'I've got blades in my mouth'. I told</p> <p>6 the team to enter and take control of D1853, which they</p> <p>7 did. Handcuffs were applied and he was moved under</p> <p>8 restraint down the C&amp;R stairwell to CSU to meet waiting</p> <p>9 Tascor escorts. During Tascor search he showed</p> <p>10 them ..."</p> <p>11 What does that read? "A blade", what's the next</p> <p>12 word, "he had in his mouth"?</p> <p>13 <b>A. Yes.</b></p> <p>14 Q. "One blade fell out of his mouth during the search.</p> <p>15 Tascor refused to take him due to the blades as he did</p> <p>16 not have a medic. He was then placed in CSU under</p> <p>17 rule 40 for disruptive behaviour."</p> <p>18 I assume what you said to him, the comment you made,</p> <p>19 "Swallow as many as you want", was left out of account</p> <p>20 here because it wouldn't have made you look particularly</p> <p>21 good, would it, Mr Donnelly, if you had included it? It</p> <p>22 is not a complete account, is it?</p> <p>23 <b>A. No, it's not.</b></p> <p>24 Q. Why did you leave out of account, however bad it made</p> <p>25 you look, the comment you made to him?</p> <p style="text-align: center;">Page 168</p>

<p>1 <b>A. I don't honestly remember making it. I obviously didn't</b>  2 <b>mention that we let his head up during the use of force.</b>  3 Q. Can you say that again?  4 <b>A. I made the decision to get the head officer to release</b>  5 <b>his head. I didn't put that in either.</b>  6 Q. What I'm just wondering, Mr Donnelly, is whether,  7 whenever we look at these incident reports or use of  8 force reports -- because if we went through the use of  9 force reports, we won't find, I think, any of your  10 brother officers mentioning it either. Do people pick  11 and choose what they're prepared to put in their  12 statements?  13 <b>A. I don't remember saying it. You don't write down every</b>  14 <b>single thing that you say during an incident.</b>  15 Q. The final thing I'm going to ask you about is an  16 entirely different incident, and this is one that  17 concerns you in an indirect kind of way. It is  18 a complaint made by another detained person, D119,  19 in July 2017 about two incidents on the 21st and 23rd of  20 that month. So can we go, please, to an entirely  21 different document, tab 10, chair, &lt;CJS001415&gt;, please.  22 This is a complaint document, Mr Donnelly, completed by  23 D119 at Brook House, and if we go to the next page,  24 page 2, we see written out, presumably by the detained  25 man, or on his behalf:</p> <p style="text-align: center;">Page 169</p>	<p>1 involved? Did you speak to everybody involved?  2 <b>A. That's what we would normally do. I don't actually</b>  3 <b>remember the incident, but, yeah, you speak to everybody</b>  4 <b>you can, really.</b>  5 Q. "This investigation was conducted by myself and involved  6 speaking to the staff involved and reviewing security  7 reports.  8 "Your complaint contained one main issue which has  9 been investigated.  10 "You felt unhappy that a particular officer did not  11 let you out to complete your cleaning duties on  12 2 separate occasions and was rude to you.  13 "You stated that on the 21st of July ..."  14 And here you simply recite the complaint which  15 I have already read:  16 "After receiving your complaint, I went to speak to  17 the officer in question and Detainee Custody Manager  18 S Dix, who you mentioned, to discuss the incident  19 further. I also reviewed security reports submitted at  20 the time by the officer regarding the events of that  21 day.  22 "The Deputy Director and Head of Brook House,  23 Steve Skitt, has commissioned a separate internal  24 investigation to be completed under the company  25 disciplinary procedures and I can confirm at this point</p> <p style="text-align: center;">Page 171</p>
<p>1 "On Friday, 21st July I spoke to DCO Teyron Evans as  2 she did not let me out of my room for my lunchtime  3 cleaning duties. She was rude to me and slammed the  4 door, narrowly missing my face. Today, she once again  5 refused ..."  6 "Today", therefore, being the 23rd, which is the  7 date of the document:  8 "Today she once again refused to let me out for my  9 cleaning duties despite letting other workers out on the  10 same floor as me. When I rang my call bell to speak to  11 the officer she called me a knobhead and hung up. She  12 was very rude and I asked to speak to DCM Steve Dix.  13 I spoke to DCM Dix with DCO Evans and she confirmed she  14 had called me a knobhead. She was rude to myself and  15 the manager and stormed out of the office."  16 That was the nature of the complaint. If we go,  17 please, to a letter that you were responsible for on the  18 next page, page 3, we see at the top the date is  19 21 August:  20 "Thank you for your complaint dated the 23rd  21 of July 2017 treatment you received from an officer at  22 Brook House. I am writing to advise that I have now  23 completed my investigation and would like to offer the  24 following response."  25 First of all, do you remember what the investigation</p> <p style="text-align: center;">Page 170</p>	<p>1 that concerns have been identified.  2 "The internal investigation is still ongoing at  3 present, but Mr Skitt has confirmed that he will advise  4 the Home Office with the full outcome from this  5 investigation."  6 Over the page, please:  7 "At this point, I can confirm that your complaint  8 will be upheld due to you not being allowed out of your  9 room to carry out your cleaning duties. I would also  10 like to apologise for the behaviour displayed by the  11 member of staff in question and I can assure you that we  12 do not condone bad behaviour from residents or staff and  13 this is what the ongoing internal investigation is  14 looking into further.  15 "I hope you feel satisfied with the way in which  16 your complaint has been handled, however, should you  17 wish to discuss any aspect of it, please feel free to  18 contact me."  19 Now, you upheld that complaint; yes?  20 <b>A. Yes.</b>  21 Q. In your first witness statement, and something you told  22 us a little earlier, I thought you said you had never  23 witnessed any verbal abuse by staff to detained persons.  24 So when you use the word "witness" in your statement,  25 you mean actually hear it --</p> <p style="text-align: center;">Page 172</p>

<p>1 <b>A. Yes.</b></p> <p>2 Q. -- or experience it yourself?</p> <p>3 <b>A. Yes.</b></p> <p>4 Q. But here the allegation, amongst others, was that this</p> <p>5 DCO had called this man a knobhead?</p> <p>6 <b>A. Mmm.</b></p> <p>7 Q. But because you hadn't witnessed it, that is something</p> <p>8 qualitatively different to, as it were, what you had to</p> <p>9 investigate? So here was something indirect, you hadn't</p> <p>10 directly heard anybody use any such language towards any</p> <p>11 detainee in all the years you'd been there?</p> <p>12 <b>A. Yes.</b></p> <p>13 Q. That's what you're telling us. Because, as you have</p> <p>14 said, abuse was a one-way street?</p> <p>15 <b>A. I didn't witness this.</b></p> <p>16 Q. No. But you knew about it, so abuse clearly wasn't</p> <p>17 a one-way street, was it?</p> <p>18 <b>A. No.</b></p> <p>19 Q. You apologised for the behaviour of this DCO, and that</p> <p>20 behaviour included the rudeness, presumably?</p> <p>21 <b>A. Yes.</b></p> <p>22 Q. And calling this man a knobhead.</p> <p>23 Something else you told us a little earlier as well,</p> <p>24 and this is in paragraph 14 of your first witness</p> <p>25 statement; do you remember in the witness statement you</p> <p style="text-align: center;">Page 173</p>	<p>1 Questions from THE CHAIR</p> <p>2 THE CHAIR: Just two, Mr Donnelly. I won't keep you any</p> <p>3 longer than necessary.</p> <p>4 The first is, you obviously -- as Mr Altman was just</p> <p>5 saying, you have told us, and you have put it in your</p> <p>6 witness statement as well, that you didn't witness any</p> <p>7 of the types of behaves or language that we saw on the</p> <p>8 Panorama documentary.</p> <p>9 In your opinion, is it possible that staff could</p> <p>10 have deliberately not used certain language or not</p> <p>11 behaved in a certain way around you or other members of</p> <p>12 staff if they believed that certain -- there would be</p> <p>13 certain repercussions for that?</p> <p>14 <b>A. I think that it's possible, yes. I mean, the DCMs are</b></p> <p>15 <b>kind of like the bosses on the day -- not obviously</b></p> <p>16 <b>senior management -- but it's possible that they</b></p> <p>17 <b>wouldn't do it in front of us.</b></p> <p>18 THE CHAIR: Thank you. Related to that, when there were,</p> <p>19 for example, inspections taking place -- and you've</p> <p>20 obviously worked at Brook House for a number of years</p> <p>21 and, therefore, will have experienced a number of</p> <p>22 inspections -- in your own experience, do you think</p> <p>23 there's ever a change in behaviour of staff or managers</p> <p>24 or senior managers when they are aware that they're</p> <p>25 under scrutiny?</p> <p style="text-align: center;">Page 175</p>
<p>1 said you had never once upheld a complaint, apart from</p> <p>2 those dealing with loss of personal items.</p> <p>3 <b>A. Yes.</b></p> <p>4 Q. Well, here is just one example?</p> <p>5 <b>A. Yes.</b></p> <p>6 Q. So how accurate is the evidence that you have given by</p> <p>7 way of your witness statement to this inquiry, do you</p> <p>8 think, Mr Donnelly, or are you painting a picture of</p> <p>9 Brook House and of your own duties and responsibilities</p> <p>10 which plainly isn't accurate?</p> <p>11 <b>A. I'd completely forgotten about that complaint.</b></p> <p>12 Q. Well, you have had this material and you could have</p> <p>13 corrected it, couldn't you, at any time and said,</p> <p>14 "Actually, I have made a terrible mistake, because this</p> <p>15 is one example of where I did uphold a complaint of</p> <p>16 verbal abuse by a DCO towards a detainee". Do you</p> <p>17 think, Mr Donnelly, that you're a little in denial about</p> <p>18 Brook House during the G4S years? Do you think you're</p> <p>19 a little in denial about the reality of life there?</p> <p>20 <b>A. I don't think so, no.</b></p> <p>21 MR ALTMAN: You don't think so, all right.</p> <p>22 Chair, that's all I'm going to ask. Do you have any</p> <p>23 questions?</p> <p>24 THE CHAIR: I do.</p> <p>25</p> <p style="text-align: center;">Page 174</p>	<p>1 <b>A. What, when the inspectors are in? Not in my opinion.</b></p> <p>2 <b>I think we just carry on as normal and wait for the</b></p> <p>3 <b>report to come out and do a remedial action plan.</b></p> <p>4 THE CHAIR: Okay. Sorry, three questions, there is one</p> <p>5 final one as well.</p> <p>6 Mr Altman asked you about exposure to traumatic</p> <p>7 events, such as somebody self-harming.</p> <p>8 <b>A. Mmm-hmm.</b></p> <p>9 THE CHAIR: Mr Altman asked you questions about what was</p> <p>10 available in terms of services for detained people who</p> <p>11 may have witnessed traumatic events. As a member of</p> <p>12 staff witnessing traumatic events, whether that's</p> <p>13 literally seeing something happen, whether it's being</p> <p>14 part of -- somebody who may cut somebody down or respond</p> <p>15 to a self-harm incident, what happens to a member of</p> <p>16 staff following an incident?</p> <p>17 <b>A. From memory, there is -- there was a care team, which is</b></p> <p>18 <b>a team of people dedicated, but I think you had to sort</b></p> <p>19 <b>of reach out to them, they wouldn't routinely come and</b></p> <p>20 <b>seek you out, if you needed sort of to talk about it or</b></p> <p>21 <b>anything like that.</b></p> <p>22 THE CHAIR: Do you ever remember seeking them out?</p> <p>23 <b>A. No.</b></p> <p>24 THE CHAIR: Are you aware of any other staff seeking that</p> <p>25 care team out following incidents?</p> <p style="text-align: center;">Page 176</p>

<p>1 <b>A. Not that I can recall. I'm not saying it didn't happen;</b></p> <p>2 <b>just that it's kind of a private thing. So they</b></p> <p>3 <b>wouldn't -- nobody knew -- the whole place wouldn't know</b></p> <p>4 <b>that somebody had sought support.</b></p> <p>5 THE CHAIR: They wouldn't be visible necessarily following</p> <p>6 an incident; would make themselves known to you, follow</p> <p>7 up with people, for example.</p> <p>8 <b>A. Not really, no.</b></p> <p>9 THE CHAIR: Thank you. During the relevant period, would</p> <p>10 a senior manager ever come and speak to you following</p> <p>11 a self-harm incident or another potentially traumatic</p> <p>12 incident?</p> <p>13 <b>A. No, not to my recollection.</b></p> <p>14 THE CHAIR: Does that ever happen now?</p> <p>15 <b>A. I would say it's getting better. We have sort of more</b></p> <p>16 <b>formalised kind of debriefs and, you know, the question</b></p> <p>17 <b>is asked and, you know, we've got a social worker who is</b></p> <p>18 <b>in charge of the care team, so they are a lot more</b></p> <p>19 <b>proactive now than they were.</b></p> <p>20 THE CHAIR: Would you say, on balance -- is it easier to</p> <p>21 access talking to somebody after an incident like that?</p> <p>22 <b>A. Yes, and I think, at Serco, they approach you, rather</b></p> <p>23 <b>than the other way around. They will seek you out,</b></p> <p>24 <b>a member of the care team or a social worker will come</b></p> <p>25 <b>and say, "How are you?"</b></p> <p style="text-align: center;">Page 177</p>	<p>1</p> <p>2 Questions from THE CHAIR .....175</p> <p>3</p> <p>4</p> <p>5</p> <p>6</p> <p>7</p> <p>8</p> <p>9</p> <p>10</p> <p>11</p> <p>12</p> <p>13</p> <p>14</p> <p>15</p> <p>16</p> <p>17</p> <p>18</p> <p>19</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 179</p>
<p>1 THE CHAIR: Thank you. I have no other questions. Thank</p> <p>2 you very much, Mr Donnelly. I understand it is not an</p> <p>3 easy experience, but I'm grateful for your evidence.</p> <p>4 <b>A. Thank you.</b></p> <p>5 <b>(The witness withdrew)</b></p> <p>6 MR ALTMAN: 10.00 am tomorrow is when we have Mr Paschali.</p> <p>7 THE CHAIR: Thank you very much. See you tomorrow at</p> <p>8 10.00 am.</p> <p>9 (4.34 pm)</p> <p>10 (The hearing was adjourned to</p> <p>11 Thursday, 24 February 2022 at 10.00 am)</p> <p>12</p> <p>13</p> <p>14 <b>I N D E X</b></p> <p>15</p> <p>16 Statement of D1473 (read) .....1</p> <p>17</p> <p>18 Statement of D2158 (read) .....21</p> <p>19</p> <p>20 Statement of D313 (read) .....38</p> <p>21</p> <p>22 MR CHRISTOPHER MARTIN DONNELLY .....53</p> <p>23 (affirmed)</p> <p>24</p> <p>25 Examination by MR ALTMAN .....53</p> <p style="text-align: center;">Page 178</p>	

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