

BROOK HOUSE INQUIRY

FIRST WITNESS STATEMENT OF JEREMY KENNETH PETHERICK

I, **Jeremy Kenneth Petherick**, will say as follows:

INTRODUCTION

1. My date of birth is DPA and I make this statement following the Inquiry's Rule 9 request dated 5 February 2022.

BACKGROUND & ROLE

2. Summary of Career

- May 2008 – August 2019: Managing Director ('MD'), G4S Custodial & Detention Services ('C&DS')
- July 2005 – May 2008: Managing Director, Offender Management & Immigration Services, GSL (UK) Ltd
- January 2000 – July 2005: Area Manager, South-West, HM Prison Service
- January 1999 – January 2000: Member of Senior Command Course, Royal College of Defence Studies
- March 1998 – December 1998: Head of HM Prison Service's Security Group
- June 1995 – December 1998: Governor, HMP Channings Wood
- February 1993 – June 1998: Governor, HMRC Reading
- 1982 – 1993: Various posts in the grades of assistant governor through to deputy governor, including operational postings ranging from youth custody centres to high-security establishments and one period in the human resources section of HM Prison Service headquarters.

3. Qualifications

B.Ed (Oxon).

PERSONAL OVERSIGHT

4. With regards to the Services Incident Reporting Procedures [CJS000706], my overall responsibility as MD was to:
 - Ensure such a policy was in place and that it was understood by the Directors and others reporting directly to me
 - To give clarity as to what type of incident should be reported immediately by telephone and which by the submission of a media incident report
 - To give clarity on the accountability of directors for the accuracy of the reporting system in their establishment; and
 - To review the reports that were submitted to satisfy myself that appropriate action(s) had been followed.
5. I am asked to explain my responsibilities as the Gold Commander in issuing Weekly Bulletins, and am referred to document CJS004112. I did not issue the Weekly Bulletins. Document CJS004112 appears to be a document internal to Brook House and Tinsley House that provided a list of all relevant staff availability (Duty Directors etc.). I did not receive copies of these.
6. I believe I am listed in this particular bulletin as I would have been the duty Gold Commander for the C&DS division and on-call for any serious incident as set out in the document.
7. I am referred to page 5 of my Verita interview [VER000263] and asked to comment on health and safety reporting matters. C&DS had a Head of Health, Safety and Environment ('H&S Head'), who reported into me. However, each establishment had its own health and safety function responsible for the overall health and safety of their establishment. This function reported into the establishment Director.
8. Health and safety data formed part of the establishment trading reviews (discussed in more detail later in this statement). My recall is that the relevant health and safety information was collected and reported at a site level, and that the data was primarily

reviewed in discussion at the trading reviews. The H&S Head was present at those reviews and participated in the related discussions. He would also report to me on any serious or significant incidents, or on any matters that I asked him to investigate or explore further, particularly in respect of serious or unusual events.

9. I am asked to comment on any challenges and/or trends that I noticed during the Relevant Period in respect of falls, assaults and fires. Given the passage of time, I cannot recall facing any particular, unusual challenges or trends in relation to these matters.
10. I have no recall of there having been any fires at Brook House during this period.
11. I am asked when the Chief Operating Officer's Forum was introduced, I believe this was introduced in the period following Paul Kempster's appointment.
12. The purpose of the forum was to:
 - Replace the previously existing Managing Director (MD)/Senior Management Team (SMT) meeting structure;
 - Reinforce the COOs role in being the line manager of the establishment Directors; and
 - Enable me, as MD to concentrate on strategic issues relating both to the C&DS division and the wider G4S Care & Justice Services business.
13. Whilst I refer to violence reduction initiatives within my interview, I recall that I was talking about the C&DS business unit as a whole rather than any specific policy or initiative at Brook House.

TRADING REVIEWS

14. The trading review purpose was to review the business unit's performance across several deliverables – Health & Safety, operational performance, Human Resources, commercial and so forth. This allowed the unit to report current delivery, celebrate success and discuss challenges. It provided an opportunity to discuss/debate issues impacting on the unit and to examine business opportunities.

15. The structure was pyramidal in nature. As MD, I would have held a monthly trading review with each of my establishments. They would present a trading pack at the meeting – they were encouraged to submit the pack prior to the meeting – and this acted as the base for the discussions. Additionally, I would have spent some time at the end of the review in a 1-to-1 meeting with the Director – this allowed for discussion on any issues either (s)he or I wanted to discuss in a confidential forum.
16. The outputs from those meetings served as the basis for the papers that were prepared for my monthly trading review with my line manager, Peter Neden. The format of those trading reviews was similar in approach to mine with my establishments. Objective data was discussed, but it was also my opportunity to flag up and discuss any issues of concern I had, and Peter could similarly raise areas of concern he had.
17. Until the COO's appointment, I normally chaired the C&DS trading reviews. If, for any reason I was absent, it would usually then have been chaired by either Lee Hanford or Martyn Kenyon.
18. Attendees from the central team would usually consist of:
- Chairman (as above, usually me);
 - Operational lead (Lee Hanford);
 - H&S Head;
 - HR adviser;
 - Commercial manager (Martyn Kenyon);
 - Audit Manager (Mike Gibson); and
 - A notetaker.
19. There would also be core attendees from the establishment teams, but the Director had the freedom to decide their total team attendance (some used the opportunity to attend to develop team members or they brought individual managers to “talk to” agenda items) but would be the Director (or Deputy Director in absence), the HR advisor and Commercial Manager.

DETAINEE SURVEY

20. My attention is drawn to page 8 of document VER000217, Mark Demian's Verita interview transcript, in which I am asked to comment on the Detainee Survey. This survey was not introduced by me, but implemented as part of the 3-Month Action Plan dated 19 January 2018 (see CJS007395, page 20). As this shows, the survey was introduced to "*assess the climate in the centre with the results presented [to] the SMT & Safer Custody Team.*"
21. I am not on the proposed distribution list for the survey results and cannot recall whether they were ever shared with me. I am not therefore able to assist the Inquiry further on what the results of the survey showed, although it does appear from paragraph 77 of the transcript that nothing was seen to indicate that detainees felt threatened or bullied by staff.

STAFF SURVEY

22. My attention is drawn to page 20 of Debbie Walker's Verita interview transcript [VER000241] where she talks about a staff survey that took place in September 2017. This survey, I believe, was distributed to all Gatwick IRC staff. As Brook House is part of the Gatwick IRC, I must assume that they were included and note from Debbie's interview that 160 colleagues responded.
23. I am not sure exactly what survey Ms Walker refers to and whether she is talking about a specific survey sent to C&DS staff, or the annual G4S Group staff survey, which was sent to every G4S employee across the world. I do not recall a specific survey being sent to Brook House or C&DS staff. The Group staff survey would have been conducted at a Group level. I believe this survey covered a range of questions relating to colleague opinions, both about the specific company and site/business unit they work for. I also recall that it sought both their views on matters directly impacting on them as well as seeking suggestions for how their working lives could be improved.

QUARTERLY EXECUTIVE BOARD MEETINGS

24. I am asked about the Quarterly Executive Board meetings and am referred here to document HOM0331981 (at 64 of page 17).

25. The Quarterly Executive Oversight Board was an opportunity for senior executives from both the Home Office and G4S to discuss any significant operational or commercial issues, and to “horizon scan” for any upcoming issues. It was an opportunity for the organisations to discuss any issue or strategic developments. Similar meetings were held between the Home Office and other contractors. Brook House would have been discussed within the context described in this paragraph. Prior to the meetings, a report would have been completed and shared that “RAG” rated the establishment’s delivery across several measures. That document was discussed at the meeting.

26. I do not have copies of any minutes between 2016 and 2018. My recall is that these were prepared (with input from the relevant stakeholders, including G4S) and shared by the Home Office.

HOM005917 (PAGE 2)

27. I am asked to comment on the departure of myself, Peter Neden and Paul Kempster, I am also asked to comment on the replacement of the entire management chain.

28. When HOM005917 talks about the replacement of the entire management chain, I assume it is talking about the local management chain within/for Brook House as Peter was the Regional President of G4S (UK & Ireland). He was not part of the local management chain. I do not know the reasons why he left G4S.

29. My recall is that following a restructure, Paul Kempster’s role was made redundant.

30. I retired on the month of my DPA

RELATIONSHIP WITH THE HOME OFFICE

31. I believe my relationship with the Home Office in relation to Brook House was a mutually professional one. There was a respect for the others’ roles and responsibilities. Equally, there was a respect for the integrity of others. It was an open relationship

within which discussions could be had at several levels – from the Home Office staff on site through to the Home Office Director with responsibility for Immigration Removal Centres. The nature of those relationships meant, when necessary, I was able to contact them directly to discuss issues as they arose.

RELATIONSHIP WITH THE IMB

32. I believe my relationship with the Brook House IMB was mutually respectful and professional. I would not describe it as being overly “close” in nature. When visiting Brook House, I would speak with any IMB member who was visiting. They struck me as a good, interested IMB who took an appropriately active interest in the people and events at the establishment. I knew one of the members (who was Chairman of the IMB for a period) from our time as colleague Governors in the Prison Service. His presence, and experience gave me further assurance in relation to Brook House’s delivery
33. I am specifically asked to comment on whether I agree that the IMB members had a tendency in the IMB meetings to over empathise with the G4S management team and the Home Office (page 31 of CJS0073709). Given the years that have passed since, I cannot recall attending any IMB meetings at Brook House. However, from my interactions with Board members generally, I did not form an impression that they were “over-empathising” with either the G4S management team or the Home Office.
34. Reflecting on this through the prisms of my role with G4S (responsible for 6 establishments) as well as formerly an Area Manager (with HMPPS responsible for 13 prison establishments) and a Governor (within HMPPS), I consider the Brook House IMB had a professional interest in, and commitment to, the appropriate discharge of their responsibilities. Their approach compared favourably with other establishment IMBs.
35. I also believe that the IMB had sufficient independence from the G4S management team and the Home Office. I do not believe that it would be correct to view or interpret positive and appropriately professional relationships as being overly “soft” or compliant in approach. In my experience, the IMB were able to raise issues and express opinions.

PHYSICAL LAYOUT PRIOR TO THE RELEVANT PERIOD

36. I am referred to document CJS004405, the Brook House IRC Service Provider Change Request dated 19 December 2011 (which I believe was in place during the Relevant Period), regarding the adaptation of the CSU, as authorised by me.
37. I am asked why it was proposed that the RFA section consisting of 13 single beds should be converted into a 26 bed residential unit (twin rooms). I firstly note that this is an incomplete Service Provider Request Form (Form A) in that it is unsigned. My experience is that the final, signed document, together with consequent discussions and the final Notice of Change document would provide a far more comprehensive pack of information on which to comment.
38. On reading the document, it appears to me that the proposal was to reduce the size of the current CSU and to utilise the accommodation freed up by this as a pre-discharge unit/unit to provide constant supervision and/or welfare needs. Some 11 years on, I cannot recall specific discussions on this, but it would seem to me to be an appropriate proposal. Experience gained from other locations throughout my career leads me to believe there was a risk that occupation of CSUs might be driven by physical capacity rather than actual need. It was far better to utilise unneeded capacity for other uses such as, in this case, a pre-discharge unit.
39. In my considered view, there was adequate space both for detained persons and staff on this unit. The reduced CSU capacity meant individuals held there had, if anything, more direct interactions with staff rather than less. In my experience, increased staff interaction normally enabled a swifter resolution of issues related to individual detainees.
40. My recollection from my visits to this unit indicated that staff morale was generally positive. Inevitably, there were some days when that was not so – such days could be attributed to several factors. It is my general experience that staff morale in specialised units is generally positive.

DL0000141 (PAGES 32-33) & CJS000768 (PAGE 24)

41. In relation to the introduction of the additional 22 bed spaces in March 2013. My recollection some 9 years after the event is that this followed discussions between Home Office representatives and G4S representatives. As I recall, the aim was to make more effective use of the accommodation, for example to provide additional scope for monitoring detainees at risk of self-harm.
42. I am asked whether I agree that before the introduction of 22 additional beds there were already pressures and demands on the staff from the existing population and inadequate staff. I do not.
43. There will always be differing opinions on staffing ratios but in my professional view and experience, the agreed ratios were appropriate. In that experience, I know unions would raise concerns if they thought agreed ratios were inadequate. I have no recall of any such approach from the relevant union and that contributes to my view of the adequacy.
44. It is axiomatic that there are “pressures and demands” on staff working in every secure environment. From my visits to the establishment and feedback from others, I do not consider the pressures and demands on Brook House staff were unrealistic.
45. I am asked whether the introduction of the additional 22 bed spaces were introduced to increase profit. They were not. The beds were introduced to make more effective use of the available accommodation and to increase operational efficiency by, for example, having a specified pre-departure unit, rooms designed for the constant monitoring of individuals at risk of self-harm and so forth. Profit was not the causal factor in the creation of these additional places.
46. I am asked whether profit-increasing measures were a priority over the safety and wellbeing of the detainees and staff. This was never the case. The safety and wellbeing of detained persons and staff were always the prime considerations.

60-BED INCREASE IN CAPACITY

47. I am referred to HOM000859 and asked why the decision was made to increase the capacity at Brook House by 60 spaces.
48. This decision followed discussions between the Home Office and G4S. As I recall, those discussions arose out of a wish by the Home Office to maximise the safe usage of the IRC estate and to deal with population pressures.
49. Prior to the change notice being issued, there would have been discussions at a site level between the organisations, as well as between members of my central C&DS team and regional Home Office officials. It was probable that the proposals were also discussed at the establishment's trading review with me. Any necessary reports such as covering Health & Safety matters would have been done, and there would have been local discussions/agreement with the relevant union(s). Lastly, my C&DS commercial manager would have agreed the commercial details with the Home Office commercial team.
50. I am asked to comment on the cost impact on G4S when the additional beds were introduced. I have limited recall on this but note that it is set out in document CJS000768.

VER000263 (PAGE 16)

51. I am asked to comment on why I believed Oakhill Secure Training Centre was unsafe and why this was relevant to the addition of beds at Brook House.
52. At the time I reduced Oakhill's population, C&DS were experiencing operational challenges there, and there was a staff shortage. I therefore took the decision to reduce the population until the situation stabilised. I cited this in the interview as one example of how G4S placed safety above profit.
53. I am asked to comment on whether I considered the concerns raised by Nathan Ward about the room sizes on the detainees' mental health and whether they met international standards (see DL0000141, page 33). Given the passage of time, I cannot recall specific

discussions on these issues, although I would have expected such discussions to have occurred, both within G4S and the Home Office.

54. On 14 September 2017, I gave evidence to the House of Commons Select Committee, where I was specifically asked about this issue. I understand for reasons of Parliamentary Privilege that the Inquiry cannot rely on the transcript of that evidence. I do however repeat what I said to the Select Committee in that all rooms were approved (certified) by the Home Office.

55. Pursuant to Rule 15 the Detention Centre Rules 2001, before any room could be used to accommodate destined persons, it had to be certified as being adequate in terms of size, lighting, heating, ventilation and fittings. All rooms used for this purpose at Brook were, as I explained above, duly certified by the Home Office.

STEPHEN SHAW REPORT

56. I am asked to comment on whether I considered the Stephen Shaw Review from January 2016, where he did not recommend that the installation of a third bunk in the double rooms should go ahead (INQ000060, page 45). Given the passage of time, I cannot recall specific discussions about this. I would however have expected Mr Shaw's opinion to have been duly considered.

VER000263 (PAGE) 16

57. I am asked for the results of the Health and Safety reviews referred to in page 16 of my Verita interview transcript [VER000263]. Whilst I could not see reference to this at page 16, I did make reference at page 15. My recall is that the H&S Head looked at this and this review was focussed on the impact of the additional beds (bunk beds) on the existing building fire strategy and systems. This contributed to the HO subsequently making investments in enhancing fire fighting equipment (portable misting machines/inundation ports (indoors)).

58. In addition to fire safety, I believe that he also looked at the risk of falls from the use of the newly proposed bunk beds and provided support and guidance to the local health and safety function.

DL0000141 (PAGE 33)

59. I am referred to Nathan Ward's first statement to the Inquiry where he states that he finds it difficult to understand how I could have given approval for the addition of 60 beds at Brook House, and he further states it was negligent, reckless and that it was done without regard for the impact on detainees.

60. Whilst I note his opinion I entirely disagree. This wasn't an arbitrarily imposed increase, but one that was agreed following discussions between several operators within both the Home Office and G4S. The increase was agreed to address operational needs, and with appropriate thought given to the issues involved.

INQ000101 (PAGE 34-35)

61. I am referred to, and asked to comment on, the Live Evidence Transcript of Owen Syred's questioning, and in particular, pages 34-35 (of the document pagination but page 133-140 of the transcripts) where he states that the infrastructure for Brook House was designed for 72 hours, that Schedule D of the contract points to a short-term holding centre and that Brook House was designed as a Cat B prison with limited space for association/recreation, and that natural air and daylight was not present.

62. Brook House was built to Category B construction standards (rather than being designed as a Cat B prison). This was because of lessons learnt by the Home Office following significant past disturbances at Colnbrook IRC (2004 and 2006) and Harmondsworth IRC (2006).

63. An actual Category B prison would typically be holding prisoners serving a minimum imprisonment term of 4 years. It would have the additional facilities and resources to deliver a commensurate regime. I do not have the design specification documents to comment for certainty around the 72 hours point, but that accords with my

understanding. If not 72 hours, I do certainly recall that it was intended as a short-term holding facility.

64. Mr Syred also states that he believed that G4S would have done due diligence of the contract for Brook House prior to its acquisition of GLS. I could not see from the transcript the basis for this statement, but I was not employed by G4S at that time and cannot therefore comment on what reviews or processes were following prior to the takeover. I do recall that the contract had already been concluded between GLS and the Home Office by that time.

65. I am asked whether the design and specification of the building had an impact upon the activities and welfare provision that was provided. The physical structure of any custodial establishment will inevitably significantly impact on the regime that can be operated.. That was so at Brook House. There was limited provision for activities, this was determined in large part by the very “tight” site dimensions. The style and construction of the wings did generate a harsh physical environment which G4S did, as much as possible, try to soften by the introduction of wall decorations and so forth.

66. I am asked to address in my reply the impact the infrastructure at Brook House had on the mental health of detained persons. I am not a mental health practitioner so cannot answer that from a medical or clinical perspective, but I do believe that the greater impact on detainees’ mental health arose from the uncertainty of their situation and progress of their case, rather than the physical environment, although I am of the view that the latter is likely to have had a negative impact on that.

67. As to the question of whether the infrastructure had an impact on how staff treated detained persons, it would in my view have had an impact in terms of detainee/staff interactions around the restrictions created by that infrastructure (such as the provision of ancillary activity space, access to open air and so forth) but not to mistreatment of detainees.

MANAGERIAL OVERSIGHT

68. I am asked to comment on the development of the Senior Management Team (SMT) at Brook House [CJS0073667, page 1].
69. In 2011 when the then head of G4S Immigration Services (Andy Clark) left and took up a post with a potential competitor, he took the three most senior Brook House managers with him. This was seen at the time, and subsequently, as poor professional practice, as the impact on the stability of any establishment by such a loss of the “top team” would be considerable. I was then asked to take on the responsibility for the IRCs.
70. A competition for the vacant posts was held and Ben Saunders was appointed as Director and Duncan Partridge as Deputy Director. Both had been applicants for the Director role. Eventually, it became clear that there were some tensions between the two. Such tensions were not unique to Brook House, as they do emerge in other management teams, both within and external to custodial environments. Other tensions between senior management team members also emerged.
71. I and some members of my central team spent some time and energy on working to resolve these issues, both through formal processes and informal guidance and coaching. Some issues were intractable, and were only resolved through some individuals leaving the establishment.
72. Mr Saunders and I had an open, professional relationship that allowed us to have conversations on all matters, including managerial approaches, specific challenges and so forth. He was very aware of the deliverables set out in the contract and his responsibilities in their delivery. He was extremely adept in building strong, open relationships with others, and that was particularly notable in his stakeholder management.
73. In my opinion, his skill base was different, and complementary to that of his deputy. In my experience of managing establishments, it was beneficial to have a balance of skills between the “in charge” and their deputy. It was preferable for the in-charge to lead on stakeholder management, and this is what Mr Saunders did. The deputy should lead on the operational matters.

74. There were challenges to Mr Saunders from some of his SMT. In my view, some came from his management style and some came from historical issues arising from time spent at other sites, differing managerial philosophies/approaches, and the inappropriate ambitions of some SMT members. Those issues weren't restricted to only the Gatwick SMT, but they did seem to be more acute there.
75. The challenges of managing the Gatwick sites were exacerbated by the dual nature of the site. The two component sites (Brook House and Tinsley House) had different challenges and, I know from managing other dual sites, tensions can develop in such situations. Often, they grow out of one site feeling the more dominant and the other believing they have a satellite status.
76. I am referred to, and asked to comment on, my file note I prepared following a visit to Brook House on 28 October 2014 [VER000103]. As I recall, I made this visit at short notice because of the situation. I had received an e-mail from Michelle Brown. I cannot after the time that has since passed remember the precise content of the e-mail, but I do recall it generally in that she had expressed several concerns, largely around Mr Saudners' management (as generally explained in this statement). This, together with my general awareness of stresses amongst the SMT led me to decide to visit as swiftly as I could.
77. During the visit, I had separate meetings with Mr Saunders and Mr Partridge. With my meeting with Mr Saunders, I discussed the reason for my visit, disclosed the contents of Ms Brown's e-mail, the number of grievances/investigations related to SMT members and duty Director cover arrangements. I also discussed his managerial relationship with Mr Partridge, stressing my expectation that the relationship should remain professional. I also said that I was intending to deploy a further managerial resource into the establishment. Mr Saunders welcomed this. We also discussed the deployment of the SMT as well as his general managerial approach. I gave him some advice about that. Lastly, we discussed his own wellbeing.
78. In my meeting with Mr Partridge, I again explained the reason for my visit and expressed some surprise at the length of time before he would be able to meet Lee

Hanford, who was investigating the grievance he had submitted against Mr Saunders. My recall is that it was at Mr Partridge's request that the meeting had been delayed. I asked if he was content to continue working at Gatwick IRCs at that time. He did say he was keen to do so, albeit with some concerns. I set out to him, in the same way as I had to Mr Saunders, my expectations of professional behaviours.

79. I told him of my intention to deploy a further managerial resource, but formed an impression that he was unhappy about it. I enquired about the occupational health appointment that had been agreed would happen and was disappointed to hear that he was still awaiting that. I said I would follow-up it up. I also said that I would ask the Health and Safety Manager to undertake a stress risk-assessment. Lastly, we discussed duty Director deployment.

80. I was concerned about the stability of the management team at Brook House due to the unusual number of grievances that had been submitted by SMT members. That was an indicator of an unsettled team, and I wanted to try and resolve the issues. When I raised these concerns with Mr Saunders, there was understandable disappointment, tinged with a degree of embarrassment that these matters had reached my level.

81. I am asked to comment on the "clumsy managerial issue" I witnessed when I was with Mr Saudners, but feel that the file note accurately records my observations at that time.

82. I am also asked to comment on the changes and improvements that were implemented to the SMT following this meeting. The most significant one that I can recall was the deployment of a further, experienced managerial resource into the establishment. Given the years that have since passed, I do not recall any specifics about other initiatives or their effect.

83. I am reminded of my investigation interview with Stephen Cotter on 17 October 2017, in which I stated that there were concerns about Mr Saunders' management style and relationships, and that I had many conversations with Alison Ashcroft about this.

84. Ms Ashcroft was my Senior Human Resources Business Partner (SHBRP) at that time. I valued and trusted her advice and would often invite her to be a "sounding board".

We regularly discussed the abilities and needs of Directors and SMTs. As I recall, the discussions with her in respect of Mr Saunders reflected his developmental needs and managerial approaches.

85. This was couched in the context of the number of grievances amongst his SMT and the causes of those grievances. We also reflected on whether he was getting the support from SMT members that he could legitimately expect or whether some were seeking to undermine his role.

86. The main concerns about Mr Saunders' management style and relationships primarily arose from the grievances that had been submitted, but also from some personal observation as well as reports from my central team members following visits to Brook House. For the avoidance of any doubt there were never any concerns related to his care and treatment of detainees.

87. I sought to resolve those concerns through giving support and guidance (formally and informally), as well as commissioning grievance investigations where appropriate. I also tasked members of my central team to give advice and guidance to Mr Saunders (and others) at Gatwick.

CONTRACT

88. There were monthly contract review meetings chaired by the Home Office. These were however attended by the Brook House SMT. I did not attend these meetings and am therefore unable to assist the Inquiry on what issues were raised or discussed.

89. I am asked to comment on the Service Provider Change of Request Form dated 19 December 2011 [CJS004405] and the Notice of Change notification dated 19 June 2014 [CJS004457]. Service Provider Change of Request Forms were used when there was a requirement for G4S to change the terms of the contract.

90. Such requests were generated either following discussions with the Home Office or as a result of discussions within the provider's company, generally at a local level. Some might also be stimulated by a change in legislation or following the issuing of a new or

revised Detention Services Order. The change request would also address, to the extent applicable, any upward or downward revision to the contract price required to reflect the change in circumstances occasioned by the change request.

91. Once generated, the Home Office would consider the request, seek clarification as necessary and generally discuss the request with G4S. If the Change Request was granted, the necessary Contractual Change Notice would then be drawn up to give contractual effect to the agreed changes, which G4S would then implement.
92. Before G4S would propose a change, it would usually have been discussed between the establishment and me/members of my central team. If the financial impact was over certain limits, there was a company governance structure that also had to agree to the request. Once the required governance processes were completed and approval given the proposal was submitted to the Home Office.
93. The Home Office would then undertake their own due diligence processes, seeking clarification as necessary. I am unaware of the Home Office's own governance/approvals structure, but once agreed the change request would be the subject of a formal Contractual Change Notice as I explain above.
94. Whilst I had overall responsibility for the C&DS business division's profitability, each establishment Director was responsible for the profitability of their own contracts.
95. I am asked to explain what steps, if any, I took to increase profitability for the Brook House contract prior to the Relevant Period. I cannot recall at this time period any specific steps as such - contracts were not run with specific profit driven objectives. The focus was always on ensuring that the services provided were provided in accordance with the contractual requirements, for which would be delivered at the agreed price.
96. I am asked to explain whether the Brook House management team would have been aware of the contract profitability. Some, although not all, of the SMT would have had an awareness of the profitability. They had to manage budgets and their performance

was in part measured against that. I am not however sure as to whether they would have been aware of profit at a pound and pence level.

97. As I recall, G4S did not release individual contract account profitability figures. I do recall this as being an issue that was discussed at the Select Committee (in which I attended with Peter Neden). I believe that the National Audit Office provided a report which addressed the contract profitability.

PENALTY POINTS, FINES AND MITIGATION

98. I cannot now at this time recall details about any penalties or fines applied to the contract. I do however believe that the penalties provided for under the contract were sufficient to discourage non-compliance.
99. With regards to financial penalties in relation to staffing levels and the relationship between the levels of penalty for understaffing and any financial savings to G4S. There was no correlation between penalties and savings and I did not expect any of my contracts to be managed on the basis of a trade-off between understaffing and financial savings. I have no knowledge of any of my contracts, including Brook House, being run in that way.
100. I understand that the Inquiry has been provided with the Monthly Performance Reports covering the Relevant Period [CJS004580, CJS004579, CJS004586, CJS004581 and CJS004585]. These would have been prepared by a member of the Director's team on his behalf. Whilst I am familiar with the documents, they weren't provided to me at the time - I would see a summary at the monthly trading reviews.
101. Whilst I would expect that these reports would have been considered during the monthly contract meetings with the Home Office, I was not present at those meetings, so cannot be sure as to whether or not this was the case.
102. The contract required G4S to self-report any relevant contract failures. This responsibility sat with the establishment director.

103. Since taking up the position as MD in 2005, I made it absolutely clear to all my establishment directors that my expectations were of complete honesty/accuracy in self-reporting, and how I would address any misreporting. Those views were unequivocal and made known to any new director appointment.
104. I made it clear that should an unintentional misreport occur, I expected transparency in advising the relevant Authority (Home Office in the case of Brook House) of the event, the payment of any fines (including any application of the multiple for the misreport) and of the actions taken/to be taken to avoid any repetition.
105. I do not recall being aware of any inaccurate reporting at Brook House and it is my recall that the outcome of the Moore-Stephens audit (commissioned by the Home Office) in connection with this issue did not find any systematic inaccuracies with the self-reporting regime.
106. I also recall to the extent that there was any inaccurate self-reporting, there was an applicable penalty multiplier clause within the contract.
107. I am referred to Schedule G which states that one of the performance measures was in respect of substantiated complaints, which warranted performance points of 300/100 per day, depending on the seriousness of the complaint [HOM000921, page 3]. Owen Syred stated in his evidence to the Inquiry [INQ000101, page 38] that there was a great effort not to substantiate complaints so as to avoid penalties.
108. Whilst I was not involved in the day-to-day management of Brook House or of any complaints raised, my expectation of all Directors was clear – where G4S were required to self-report issues, then that had to be done, and any resulting penalty incurred. I also expected any complaints to be appropriately, and robustly, investigated and the outcome accurately reported in line with the applicable complaints procedures.
109. I am advised that the Inquiry understands that according to the contract and KPIs, 400 points could be deducted where a detained person had been injured by self-harm, (see Schedule G HOM000921, page 2).

110. Detainee acts of self-harm of and in themselves do not trigger penalty points. The reference to the potential 400 points on page 2 has to be read alongside the further definition on page 4, which states (section (iii): Untoward Events (c)): *“Any known incident of deliberate self-harm resulting in physical injury requiring any form of healthcare intervention and involves any failure to follow laid down procedures for the safety of Detainees as set out in Schedule D.”*
111. I am referred to page 3 of the Removal Centre Monthly Report for the month ending July 2017 [CJS004581] which records that there were no *“Self harm resulting in injury”* events during July. I am also referred to page 2 of the Combined Report to the Independent Monitoring - July 2017 [IMB000047] which records that there were 14 acts of self-harm during July 2017, by 11 individuals. One required treatment off-site and 2 required treatment on-site.
112. These 2 reports serve different purposes. CJS004581 relates to the incidents that attracted penalty points arising following appropriate investigation and application of the definition given at section (iii) (c) of schedule G; whereas the combined Home Office/G4S report to the IMB [IMB000047] gives the total number of self-harm incidents that occurred.
113. I am then referred to page 38 of Owen Syred’s evidence to the Inquiry, [INQ000101] where he states that considering the number of ACDT cases which documented evidence of self-harm, you would have expected more penalty points to be awarded.
114. Whilst that is Mr Syred’s opinion, it is probable he gave it without full knowledge of the contract as expressed in Schedule G, section (iii) (c).
115. It was ultimately for the establishment director to determine whether there had been a failure to follow procedure such that an incident of self-harm had to be reported in line with the contract criterion.
116. I am asked to explain if G4S failed to report to the Home Office when there was an injury by self-harm to avoid the 400 penalty points. Given that the report to the IMB

[IMB000047] was a joint Home Office/G4S report, it is axiomatic that the Home Office was aware of these incidents and I can only assume that their consideration concluded that the incidents did not meet the conditions set out in Schedule G section (iii) (c).

117. I am asked to comment on whether I agree with Mr Syred that considering the number of ACDTs (in July 2017), I would have expected more penalty points to be awarded. It should however be evident from what I explain above that there is no direct relationship between the number of ACDTs and penalty points; not all ACDTs follow an actual incident of self-harm as ACDTs are frequently initiated following concerns that a detainee was at risk of harming themselves. Where an ACDT is opened following an actual act of self-harm, the subsequent investigation would determine whether it falls within the definition set out in Schedule G section (iii) (c).

118. I am told that it is the Inquiry's understanding that the Home Office would have been made aware of self-harm through Part C of IS91 risk assessment and ACDT notifications [INQ000101, page 44]. I am therefore asked to explain why they did not award G4S points in line with the number of ACDT cases which documented self-harm. Whilst I cannot speak for the Home Office, I can only assume they applied the test set out in Schedule G section (iii) (c), as explained above.

STAFFING LEVELS

119. I am referred to the Service Provider Change Request dated 27 October 2016 regarding staffing [HOM002079], which I authorised on 22 November 2016. The proposed change was to remove, "*Full-time DCO staff will work an average 48-hour week. The longest shift will be 12 hours*" from the contract following changes to the DCO average weekly working hours through pay negotiations. The cost impact was calculated to be zero.

120. My recall on this is limited due to the years that have since passed, but I believe that this change was implemented to bring the contract into line with working practises, which required greater flexibility and removal of the maximum shift restriction.

121. I note from the request that the change did not require any change in the staffing provision.
122. On 26 July 2018, the Home Office wrote to me [HOM0331947] regarding the reduction of DCO contracted hours from 46 to 40. It is noted that it was recommended that DCO contracted hours should be reduced. This was done to reduce the impact of long shift lengths on individual staff and to assist in the recruitment and retention as it was believed the longer shifts prior to this change were having an adverse impact on those factors.
123. The overall impact on staffing level is set out in the letter – the provision of three DCOs per Residential Unit and one DCO for each of the four Exercise yards. The target staffing complement increased by 13 DCO FTEs to a total of 145 DCOs.
124. I am referred to the Gatwick IRC's Yearly Target and Activity Report. Please refer (tab "Slide Lrk") [CJS000524]. Given the passage of time, I cannot recall whether I saw this specific document, but I would have seen similar spreadsheets in my C&DS trading reviews.
125. I am asked to explain the meaning of the term, "Staffing Levels – 95% daily (at no more than 2 days)". I understand this is the measure of designated staff on duty, the target set as being at least 95% of the contractual level. I further understand the bracketed comment "at no more than 2 days" is a reminder that, under the contract no penalties would be applied if the delivery percentage fell below 2 days in any calendar month. Actual penalties incurred are as defined in the relevant individual cells on the spreadsheet.
126. I am referred to the staffing profile (pages 179-188) within Schedule D [HOM000798] in which it appears that the Home Office agreed set numbers of staff for different periods during the day. However, in (page 7) Schedule G [HOM000921], it appears to show that the Home Office assessed whether the staffing levels have been met over a 24-hour period and asked for my comments on whether this means if there was overstaffing at certain points of the day, there could have been understaffing at other points and penalty points would not have been awarded. However, the paragraph

immediately following the first table on page 7 of Schedule G states: *“In assessing whether the Contractor has met the Required Staffing Levels the Authority shall determine the aggregate number of Detainee Custody Officers and Detainee Custody Officer Managers in the Removal Centre during the twenty four period on the day in question”* I would expect this process to be followed.

COMPLAINTS

127. I am referred to an e-mail sent to me by Linsey Tunbridge-Adams on 25 August 2017 [CJS000755], which Ben Saunders forwarded to me. As will be noted in the chain, I forwarded the e-mail to Bryony Tedder on 28 August 2017. As I recall, she was acting as the point of contact for the G4S in-house investigation team on matters related to the Panorama programme. Given the independence of that investigation, and given the years that have passed since, I cannot recall any further personal involvement with this matter.

NATHAN WARD

128. I am referred to page 3 of the Panorama Viewing Note [VER000192] in which it is noted that Nathan Ward raised concerns with me regarding roughness and Use of Force. Whilst I can recall a conversation with Mr Ward about the use of C & R, I cannot now, given the passing of time, recall when this was, nor can I recall the specific content or context of that discussion. I would however expect that I would have discussed the comments with the Director/Deputy Director, and possibly members of my central C&DS team.

129. 17 October 2017, I was interviewed about Mr Ward’s allegations [CJS0073667], which were said to have been raised during his exit interview conducted by myself and Alison Ashcroft in April 2014 when he resigned.

130. My recollection of the exit interview was that Mr Ward was not speaking from a written note, but Ms Ashcroft did recall he had speaking notes, but said he didn’t mention specific names. Having subsequently read the note, I am confident that Ms Ashcroft’s recall is accurate.

131. Pages 113-116 of Mr Ward's witness statement to the Inquiry dated 10 November 2021 [DL0000141] states that in his exit interview, he read out a list of grievances. These are listed in i-xvi.

132. As I touch on above, the discussions during the exit meeting with Mr Ward were wide ranging and largely general in nature. They included discussions about his future plans, exploring welfare issues for him and his family and at some stage agreeing the approach we would take about announcing his departure. There were discussions about certain aspects of his concerns, but as I explain above, I believe that CJS0073667 is accurately representative of the discussions that took place.

133. I am specifically asked to comment on whether I recall the list of grievances raised by Mr Ward. Whilst I recall some of the issues, they were not discussed "one by one". I note that Mr Ward goes on to say in paragraph 331 of his statement to the effect that he did not wish for the information disclosed at the meeting to be treated as a formal grievance. I also note Ms Ashcroft's assertion that he, as explained above, did not state names during this meeting.

134. Having viewed Mr Ward's list of grievances (i-xiv), my professional view is that many of them are comments about a conflicting management philosophy to his. In my view, a number set out expectations I would have of an experienced junior manager in discharging their duties. I was aware of several of the instances quoted and was aware of actions that had already been completed or were in the process of investigation. I cannot recall which were new cases. If they were new, and if they were of sufficient concern, I would have followed up on them.

135. I gave evidence to the Select Committee on this topic. I repeat to the Inquiry what I said to them in that I am clear in my mind that had Mr Ward named any individuals, I absolutely would have taken action.

136. Prior to retiring from G4S, I checked my electronic files and notebooks but couldn't find any contemporaneous notes that I may have prepared for the exit meeting,

but as explained above, I believe Ms Ashcroft's note is an accurate representation of what was discussed.

137. As I had met Mr Ward for a meeting rather than an interview, this may explain why I might not have made my own notes. The meeting was conversational in nature and free flowing. My impression was that Mr Ward was generally 'unloading' rather than setting out a few grievances. As the Brook House director, I did give verbal feedback on the meeting to Ben Saunders. As explained above, some of the issues had already been raised and were subject to review but I cannot recall now after the passing of these years as to precisely what was said in the feedback of what Mr Saunders' response was.

STACIE DEAN

138. Stacie Dean sent a letter to Mr Neden (written as Mr Needham) in which she states that she submitted a grievance to me in October 2014 [CJS00073632].

139. Whilst I recall receiving a grievance from Ms Dean, I do not recall the content of what that grievance was about. I note however from the document that I appointed Lee Hanford to investigate.

140. I am asked to comment on who persuaded Ms Dean to withdraw her grievance on the understanding that Mr Saunders would be "dealt" with. I did not have such a conversation with her and I have no awareness of anyone else having had such a conversation with her. I have no recall on whether any responses were issued, particularly in relation to the policy element of her grievance. I do however expect that G4S will have such documentation.

141. Ms Dean suggests in the grievance letter that the real G4S profit margin on Tinsley House was mistakenly revealed to the Home Office [CJS0073632, page 3]. As I recall from the contract, there was neither a "cap" nor a "collar" set in respect of profitability.

142. I have read the notes for the meeting of her grievance meeting on 3 January 2017 [CJS00073633] in that overall, she believed that the integrity of the Senior Management Team (SMT) at Gatwick was at odds.

143. Whilst I would agree that there were issues amongst the SMT at that time (which I touch on elsewhere in this statement), those issues were being addressed. Other organisations that were working in/with Brook House were not reporting concerns about the establishment's operation and delivery from such issues at the time.

144. I am specifically asked to comment on Ben Saunders and the SMT's conduct with regards to: (1) Ms Dean's removal from post at Tinsley House; (2) Ms Dean's report that Luke Instone-Brewer and Babs-Fagbo were bullying detained persons; and (3) Ms Dean being taken off the investigation into the above staff members on Mr Saunders' return from Medway.

145. In relation to the first point, I do not believe that 'removal' is correct. As I recall, the intention was for her to have a lateral transfer in the same management grade. My recollection is that another manager who was substantively in a management grade higher was to undertake the role of head of Tinsley House. That establishment's role was being expanded and made more complex, so it was appropriate that the person in the higher management grade be appointed to that post. I accept that the communications related to this issue could have been better handled by everyone involved. The paucity of that local communication exacerbated an already complex situation.

146. On the second point, from the documentation provided to me, it seems that the Head of Security was aware of concerns with those personnel, and were managing it accordingly. For obvious reasons, the management of such information is frequently limited to a small number of people, and not all managers would have been aware of the ongoing case management.

147. I am unable to assist the Inquiry on the final of the three points as I do not have sufficient information. Pivotal in that is the fact that I do not know Mr Saunders' reasoning.

148. I am asked to comment on whether Mr Saunders and others were challenged for their involvement in the above three specific matters raised by Ms Dean. I am unable to fully respond due to the passage of time. I do however recall that I did discuss the first point with Mr Saunders, and offered counsel as to how the situation could have been better handled.
149. Given the time that has now passed, I am unable to assist the Inquiry as to how these grievances were followed up, investigated (other than as I have explained above about the referral to Lee Hanford as detailed in document CJS0073681) and ultimately resolved, although I believe a short time later Ms Dean left the establishment. I would however expect that all relevant grievance documentation will be with G4S.
150. I am referred to document CJS0073668, which is e-mail correspondence between myself and Stephen Cotter from November 2017. I am reminded that when asked whether I received electronic data from Ms Dean following the meeting, I stated that I could not find an e-mail from her.
151. I am referred to page 12 of CJS0073678, investigation interview with Heather Noble on 10 November 2017. She confirms that Ms Dean e-mailed us both on 5 January 2017 [CJS0073679]. I do not however have any recall of seeing that e-mail. As I have explained already, following my interview with Mr Cotter, I conducted an electronic search for that e-mail, but was unable to locate it.
152. Ms Noble and I carried out a conference call with Lee Hanford on 17 January 2017 regarding Ms Dean's grievance [CJS0073681]. This call took place to explore aspects of her grievance, particularly those relating to her lateral transfer from Tinsley House, her non-appointment to a project management role and the staff re-profiling exercise that had been conducted at that establishment. I do not recall conducting any follow-up investigations as I was content with Mr Hanford's responses.
153. I am referred to page 2 of document CJS0073682, investigation interview with Stephen Skitt on 6 November 2017, and asked to comment on whether I was aware that

Luke Instone-Brewer and Babs Fagbo were being looked at from a Corruption Prevention point of view at the time Ms Dean raised the grievance with me. I was not aware of this (establishments would only refer up to me the most serious incidents). I am also unaware of the outcome of that work.

MICHELLE BROWN

154. I am referred to page 3 of document CJS0073671, Investigation interview with Michelle Brown on 27 October 2017, and pages 6-7 of document CJS0073663 in which she states that she was off work for 4 weeks due to exhaustion brought on by excessive workload, interactions with Ben Saunders and thinking about injustices and wrongdoings both historical and recent.

155. The following day, I spoke with Mr Saunders and Duncan Partridge about several issues. I was aware of stresses between them and spoke of how I expected them to interact professionally. I also discussed management styles and counselled them appropriately. It is difficult to define the objective outcome, but I believe that the discussions were positive and did impact on their behaviours.

156. Neither Mr Saudners nor Mr Partridge were disciplined for their role in Ms Brown going off sick as I did not consider the actions warranted formal disciplinary action and did not believe that this was necessary to achieve the necessary improvements.

DUNCAN PARTRIDGE

157. I am referred to the notes of my investigation interview with Stephen Cotter, [CJS0073667, page 5 and CJS0073663, page 6]. I stated that Duncan Patridge raised a grievance in 2014 regarding Ben Sauners' management style. My recollection of this grievance was that Mr Partridge claimed to find Mr Saunders to be more disorganised than he would have preferred, and that the latter wouldn't grasp difficult issues in the same manner as the former would have done.

158. My further recollection is that Lee Hanford, assisted by Peter Corrigan, investigated the grievances raised by Mr Partridge.

159. Mr Saunders was not disciplined in relation to the grievance – my firm opinion was that this was a clash of styles that both parties had some responsibility for. I felt that Mr Partridge had an agenda, and was not giving Mr Saunders the support I would expect from a deputy towards the director. Equally, Mr Saunders needed to develop some of his management and communication skills. I spoke with both about those issues and counselled them for the need to work on their respective areas for development.

160. I am asked why, in light of the complaints and grievances that were made against Mr Saunders, he was able to stay in his role until his departure in September 2017. As a line manager, I needed to balance a range of assessments and informational sources as to an individual's performance.

161. In respect of Mr Saudners. I received positive comments and reports from organisations such as the Home Office and the IMB. Inspectorate reports were generally positive and feedback from other managers/people at Gatwick gave a balance to the negative comments from others.

162. In my position, I also had to evaluate whether there were other factors impacting those expressing concerns. I had a duty of care to all involved in those situations and I, together with others, worked assiduously to resolve the dynamics at play at Gatwick.

163. I am specifically asked why I asked Mr Saunders to take over Medway in 2016 after the Panorama documentary into that centre, despite knowledge of those concerns as documented in page 17 of document HOM0331981. I did not however make this decision. This was taken jointly between the Ministry of Justice and the then Managing Director of G4S Children's Services. I was asked to broker that request with the Home Office because of the impact on Brook House of Mr Saunders' limited term transfer to Medway STC until the end of the contract for that establishment.

164. I am further specifically asked why I decided that Mr Saunders should return to Brook House. However, Mr Saudners was the employed Director at Brook House. He was only placed on temporary seconded deployment to Medway, and therefore entitled to return to Director position at the end of that temporary seconded deployment.

165. I was not involved in the negotiations in respect of Mr Saunders' settlement agreement on his departure from G4S, although I was made aware after the event.

WHISTLEBLOWING

166. I am asked to explain my understanding of the whistleblowing processes in place at Brook House during the Relevant Period. In short, the G4S whistleblowing policy was entitled "Speakout", and was in place at Brook House throughout the contractual period.

167. My recollection is that an external company operated this process and reported approaches to them to G4S for G4S to then investigate in accordance with the "Speakout" process. This essentially meant that allegations made through "Speakout" were properly and fully investigated for resolution. The investigation would be conducted by a senior member of G4S (I believe either a lawyer or manager within the UK & Ireland regional management team). The investigation would be outwith and independent of local reporting lines. I do however believe that the policy is addressed in more detail in G4S' corporate witness statement.

168. I am asked for my assessment of whether the whistleblowing procedures were adequate. It did seem to me that people were either unaware or nervous of utilising this system. Because of those concerns, I made a "secret shopper" call to register a complaint. Given the passing of the years since, I cannot recall when this was. I believe it was after the Relevant Period, but I cannot be sure about that. I do however recall being unimpressed with the system's response and reported those concerns through my managerial line. Those concerns were acted upon, and changes were made. I then made a second "secret shopper" call and noted improvements in the call handling.

169. As a result of the Panorama programme, G4S contacted Nick Ross and Professor Professor Richard Wortley at the UCL Jill Dando Institute of Security and Crime Science. They are acknowledged experts in whistleblowing processes. They visited Brook House and gave advice on ways in which G4S could encourage the use of the Speakout process.
170. I am asked for my comments on any oversight or monitoring which was in place during the Relevant Period to assess the adequacy of the whistleblowing processes, including whether any report would be provided to a sub-committee of the G4S Board, and/or any review that would be carried out by that sub-committee
171. I understand these processes were in place but have no detail of them as they were conducted independently of any business unit. As I explained above, I made a “Secret shopper” call in connection with my concerns, and following the subsequent actions, that appeared to have been rectified when I repeated the exercise at a later date.
172. I am unable to assist the Inquiry on any questions in relation to the number of whistleblowing complaints G4S received between 2016 and 2018 as I do not have access to that information. For the same reason, I am also unable to assist the Inquiry as to how many whistleblowing complaints G4S received relating specifically to Brook House during this period, although I would normally be informed of any whistleblowing complaints received arising from any of my establishments and have no recollection of being informed of any in relation to Brook House.
173. I was not involved in reviewing all whistleblowing allegations within G4S. I did occasionally investigate such allegations arising from other business units, but I would never be asked to personally investigate those arising from C&DS sites.
174. I am referred to page 105 of document DL0000141, the witness statement of Nathan Ward dated 10 November 2021 in which he states that he believed that staff were dissuaded to complain or use the whistleblowing policy, due to a culture of fear that is instilled.

175. I do not agree with that statement. The fact that there were a number of complaints and grievances arising from the Gatwick sites would indicate an awareness of and a preparedness to use reporting systems. From the discussions that took place with Nick Ross and Professor Richard Wortley, most organisations experience similar challenges in building staff confidence in whistleblowing lines and encouraging staff to utilise them. Their advice was invaluable in beginning to address those issues.

REACTION TO PANORAMA AND EVENT THEREAFTER

176. On viewing the Panorama programme, I experienced a range of emotions – shock, surprise, disappointment, anger amongst them. I also felt a sense of failure in that the portrayed events had happened within one of my establishments, together with a determination to get to the facts of the situation and to resolve them. I also wanted to take the learning to prevent recurrence anywhere.

177. I am referred to the letter I wrote to the BBC on 25 August 2017 [CJS000793]. I took responsibility for sending this letter as I was the MD of the business unit within which Brook House operated. The letter sought the BBC's support in assisting G4S' investigation. It also affirmed its intentions to forward the BBC's individual letters to those cited in the programme.

178. With regards to the events following Panorama, I am asked to specifically comment on: (a) The process you developed of sharing and checking the list of incidents from the BBC letter, how it was used and the end result (being referred to CJS000752, page 3); (b) The steps taken by G4S and the Home Office prior, during and after the release of the BBC documentary. To what extent did G4S and the Home Office act in concert in response to Panorama (being referred to CJS000801); (c) your communication with BBC Panorama following the documentary (being referred to BBC000003 (letter from 07 September 2017) and BBC000004 (letter from Joe Plomin); and (d) My involvement with the G4S Press Office (being referred to BBC000010 and CQC000013).

179. With regards to point (a). Following the programme, G4S commissioned an internal investigation, led by an experienced Director and reporting to the Head of G4S

in the UK. I linked the Home Office into the business manager supporting that investigation who functioned as the liaison point. I do not have access to the necessary papers to assist the Inquiry in setting out the investigation outcomes.

180. With regards to point (b). Upon receipt of the BBC's initial letter, G4S alerted the Home Office to that letter, and shared it with them. Ongoing dialogue and appropriate information sharing took place both before and following the programme's broadcast.

181. With regards to point (c). The BBC's e-mail of 26 August 2017 was in response to my letter to them of 25 August 2017, in which I had sought their support in providing any evidence they held to the G4S inquiry team. My letter of 7 September 2017 to the BBC again sought their assistance, post programme broadcast in providing evidence to the internal G4S inquiry team to facilitate their investigations.

182. With regards to point (d). Given my role as MD, I regularly liaised with the G4S press office, this was so throughout the investigations related to the Panorama program.

183. I am referred to as an example of a G4S Project Brook House Action Plans at CJS0073950, where it is understood I was the project sponsor. I am also referred to CJS0073952, an example of a G4S Brook House 3 Month Action Plans where it is understood the Project Team reported to me.

184. The purpose of the action plan was to ensure the safety and dignity of detainees and to develop our management team and colleagues at Brook House and to take any learning from there across our other establishments. As project Sponsor, I was responsible for the overall delivery of the plan.

185. The action plan achieved numerous gains, perhaps most significantly in revisions to the management structure, staff development including the introduction of Level 5 Strategic Leadership Apprenticeship courses and improvements to the living environment at Brook House

186. To the best of my recollection, the plan was drawn up by Paul Kempster/Lee Hanford and supported by HR, Operational, Audit and Commercial representatives.
187. The Project Team would report to me matters such as progress against the targets, delays/blockages, plans to resolve any delays and other issues as they emerged.
188. I am asked to comment on whether I had any involvement in the suspension of DCMs/DCOs following panorama such as DCM Webb [CJS000799] and to what extent I was kept aware of disciplinary action being taken.
189. Alongside other senior managers, I was appropriately involved in several discussions about these suspensions. I was aware of disciplinary actions that were being taken and their eventual outcomes. I did not have any role or input to the actual disciplinary hearings.
190. I am referred to document VER000043, BBC Webpage Article where it is recorded that I stated G4S does its “upmost” to train staff properly and to comment on whether this statement accurately reflects the standard of training considering the issues that arose with Jason Riggs and David Webb (am further referred to VER000113 and HOM001429).
191. I stand by my comment that G4S does its utmost to train staff properly. Where standards fell below expectation, and G4S made aware of that, action was taken to address those issues. Following the Jason Rigg and David Webb issue, G4S introduced the video recording of training sessions, and an audit system was initiated to view those tapes.
192. I am referred to page 13 of document VER000271, in which Paul Kempster says that after Panorama, Peter Neden and I decided that G4S needed to improve the assurance at Brook House. The initial thought was that a C&DS Assurance manager would be appointed, and that post would be a direct report into the MD rather than into the Chief Operating Officer (COO). This gave both independence to that Assurance Manager as well as unfiltered access to me. Following further discussion, it was agreed

that the Assurance Manager role should be a direct report into the Head of G4S in the UK. That in my opinion was the correct model.

193. The role was in its infancy when I retired, but the early signs were positive – it gave confidence at both the Corporate and the C&DS level. I'm unaware of how the role developed since.

STATEMENT OF TRUTH

I believe that the facts stated herein are true.

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

Signed:

Signature

Dated:

17th February 2022