which I used the most and D wing courtyard was for weights and exercise machines.

You would also see officers who worked on activities as they had access to the whole

centre. You would sometimes see them on the wings if they were short staffed. But

you would also see them in the gym, library, courtyards and servery. Callum Tulley is

an example of someone who worked on activities and I would see regularly all over

the centre. So was DCO Luke Instone-Brewer, who I mention more below.

69. This sort of racist verbal abuse towards me and other detained people happened all the

time. But if I complained they could retaliate by destroying my paperwork or move

me to another block away from friends, or they could use violence. If I saw officers

abusing other detained people, I would stay quiet. To speak up risked putting a target

on your back.

70. I tried to brush off the abuse, so as not to give them an excuse to punish me. Like I

would just respond with "Oh, fuck you then you knob" and walk away. But I found

that the longer I was detained at Brook House, the more angry I became. It was like I

was trapped and both the system and officers were 'taking the mick' out of me. This

made it easier for staff to provoke me.

71. A common example of verbal abuse would have been how officers asked you to do

something. It was hardly ever politely. For example, if they were asking you to return

to your cell, all they had to say was, "Can you get back into your cell in the next 10

minutes please?". If that's how they spoke, I wouldn't have had a problem with them.

But instead, they would say it like, "Get into your fucking cell now, it's bang up". It

was so unnecessary and, the more you hear it, the more it feels normal.

72. Another example would be how staff tried to refer to us as some sort of "other" group.

When going for lunch, some officers would make comments like, "Oh, you've come

back for lunch? Migrants, fucking hell. You lot never get hungry." These sorts of

comments occurred as part of your daily routine, which would make it feel normal.

DCM Steve Webb

73. A manager called Steve, I think he is DCM Steve Webb, would regularly swear at me,

call me "a prick" and tell me to "go back to your own country."

Witness Name: Statement No:

D687

Exhibits: None

74. I remember one time, I think it was maybe around the summer of 2016 when I was still on C Wing. I was feeling low and depressed – I'd been in detention for so long, in Brook House for so long, but nothing was changing. My situation seemed endless. I started to think about ending it myself and got to the stage that I wanted to take my own life. I told an officer on my wing about this and shortly after, Steve Webb came around to my cell and asked me, "what's the problem?". I told him what I had told other staff and he responded, "stop being a prick". I wasn't taken seriously. I found opening up about my emotions at Brook House really difficult and exposing. When I tried it, because that's what everyone tells you to do, this happened. After that, I

decided not to share how bad I was feeling again – there was no point. If I did, I was worried that staff would use it as another excuse to abuse me, to take the mick out of

me.

DCO Marina Mansi

75. There was also a female officer who was abusive. She was a black woman with short and curly hair. I had thought she was called Maria, but the PSU identified her from

my description as DCO Marina Mansi.

76. My solicitors have explained the contents of HOM002565, HOM002645 and HOM002637. I do not believe I had any memorable contact with Maria Rodrigues whilst at Brook House. I believe DCO Marina Mansi is the officer involved in the incident I described. However, her description in her Security Information Report of that incident is wrong and it was one of the reasons why I was subsequently refused bail. It suggests I suddenly burst into a fit of rage because she let my cell mate out for work, but not me. As I have explained above, I would respond and swear at staff – I don't deny that. But I wouldn't do it for no reason. It was always in response to

provocation, either explicit verbal provocation or the conduct of officers. Also, I would challenge anyone experiencing that environment for any period of time and

still be able to behave reasonably at all times.

Witness Name: D687 Statement No:

Exhibits: None