

BROOK HOUSE INQUIRY

First Witness Statement of Ben Saunders

I provide this statement in response to a request under Rule 9 of the Inquiry Rules 2006 dated 3 November 2021.

I, Ben Saunders, will say as follows:

1. I provide this statement with the benefit of seeing the documents that were subsequently disclosed to me by the Inquiry. Having left G4S in 2017, I have had no access to any documents from G4S. It appears from the documents disclosed to me that there may be other documents of relevance that I no longer have access to. In the course of preparing this statement within the time available, I have tried to answer the questions asked of me as fully as possible to the best of my ability and recollections.
2. I qualified as a social worker and worked for West Sussex County Council for approximately 10 years, in Children's Services within both secure and community children's homes. I left West Sussex County Council and joined G4S in 2002. I remained in Children's Services and went to work at Medway Secure Training Centre (STC) in Kent. My appointment formed part of a new management team at the STC following a management reorganisation after a period of disruption and instability. I spent a total of 10 years at Medway STC, approximately 5 of those years as Centre Director.
3. In 2012, an opportunity arose within G4S and I moved from Children's Services to Custodial and Detention Services to take on the role of Centre Director for the

Witness Name: [Witnesses full name]
Statement No: [INSERT]
Exhibits: [INSERT]

Gatwick IRCs. As Centre Director, I reported to G4S Managing Director Jerry Petherick. I left G4S in September 2017.

Medway

4. Following a Panorama programme into Medway STC, I was asked to take up the role of Interim Director replacing Ralph Marchant from January 2016 to July 2016. This followed a request from the Youth Justice Board as I had been the Director at Medway STC previously and they trusted my leadership of the Centre in what was a difficult time. Jerry Petherick spoke to the Home Office about this; they were reluctant for me to go but understood and agreed. I reported to the Managing Director of Children's Services, Paul Cook.
5. Having worked at Medway STC for 10 years, I was familiar with the role and with the Centre itself. A number of personnel who were there when I worked there remained and I was familiar with some of the people too.
6. There was no suggestion that I were to take on the Director role on a permanent basis; it was an interim role whilst a permanent replacement was found. Lee Hanford took on the role of Interim Director for Gatwick IRCs in my absence.
7. My role as Interim Director was to provide leadership and stability operationally, and manage the on-site relationship with the Youth Justice Board and any other stakeholders and investigators; to assist and support the senior managers in their posts and deal with day-to-day operations whilst investigations were carried out; to support safeguarding investigations and to liaise with the LADO in the local Children's Services team and provide access to all information available.
8. I undertook this role whilst longer term decisions were made by others on the future of Medway STC. In the end, G4S handed back the contract and Medway STC came to be managed by HM Prison and Probation Service (HMPPS). I recall this occurred whilst I was Interim Director still.

Witness Name: [Witnesses full name]
Statement No: [INSERT]
Exhibits: [INSERT]

9. In the time I was at Medway STC from 2002 until 2012, significant improvements were made in a number of areas including to the management structure, the provision of basic essentials and improved educational and recreational services, improved conditions and a generally better atmosphere for young people to live. Inspection outcomes went from uninspectable to outstanding.
10. The management team at Medway was a strong, cohesive and well performing team with a history together. There was mutual respect and trust. Members of the team were willing to take on responsibilities and develop their own way of managing their responsibilities without the need to be micro-managed, and I felt that was the right environment to allow them to develop and grow. They were able to be honest and direct with each other, they were self-effacing and they trusted each other. That helped in achieving the improvements at Medway.
11. This was my first role as Centre Director and from my experience at Medway STC and working with the management team there, I developed my own management style and processes which I moved over to my role as Centre Director of Gatwick IRCs. This was the management style I sought to apply at Gatwick IRCs.
12. It was not part of my role as Interim Director at Medway STC to carry out an investigation, make recommendations and report back. This responsibility fell to others.
13. I recall the investigation that was set up into the running of Medway, I cannot recall the terms of reference. I recall the Board were provided with unlimited access to the STC, to staff and any information; we were very open with them. I was interviewed by the Board and met with the Chair who was appointed to conduct the investigation.

Witness Name: [Witnesses full name]
Statement No: [INSERT]
Exhibits: [INSERT]

14. [INQ000010] I consider that paragraphs 2.23 to 2.25 of the report into Medway reflect my view of the situation at Medway STC in 2016 and they reflect my view generally on management structure, and the culture and behaviour.
15. Throughout my career, I have believed that the level of middle manager is fundamentally important to culture, reflection, leadership and guidance of the organisation, and that there should be investment in the development of front line managers. I have also believed that there should be a culture of appropriate challenge and for behaviour or performance to improve from such challenge.
16. These are views I had formed from my own experience of working at Medway STC between 2002 and 2012, and on what a strong management team and positive culture and behaviours can achieve.
17. Both Medway STC and Gatwick IRCs, in particular Brook House presented challenging circumstances but they were very different and there was little comparison between the two. Medway looked after children and Brook House looked after adults. There were very different circumstances to why people resided in the Centres; there were different legal bases, laws and statutory guidance to how to manage them; different contracts and different customers.
18. Gatwick IRCs is a much bigger establishment with two sites, a bigger staff team, bigger revenue and different complexities with the customer and the contract.
19. My experience at Medway STC reinforced to me the fundamental importance of front line managers and the need to invest in them, and the need for appropriate challenge. This involved professionalising the work force, having staff members who took responsibility and had accountability but at the same time making sure staff felt able to speak out. I remember conversations I had with SMT about my experience at Medway and that members of staff needed to be more inquisitive and less accepting of the type of behaviours highlighted at Medway.

Witness Name: [Witnesses full name]
Statement No: [INSERT]
Exhibits: [INSERT]

20. To my mind, the events at Brook House shown in the Panorama programme came completely out of the blue to me. There were relationships to manage and some things could undoubtedly have been done better but certainly there was never any complacency. However there were no indicators of the presence at Brook House of the behaviours at Medway nor that such events would occur.
21. I was generally quite content at the time about how things were at Brook House. There were independent reports into Brook House such as those by the Independent Monitoring Board (IMB) and Her Majesty's Inspectorate of Prisons (HMIP) which reported positively.
22. [VER000221 para 232] I never thought that the events at Medway could never happen at Brook House but at the same time, I never believed that the events at Medway STC shown by the Panorama programme would occur at Brook House. I remember having a conversation with the SMT about being vigilant with their staff and that they knew who in their staff teams were good performers and who they thought might not always behave in a way we would like even if there was no observable evidence, and that they should have proactive conversations with their staff teams. I do not recall Michelle Brown saying to me that we were going to have a Panorama on our hands if we did not learn from Medway.
23. On my return to Brook House from Medway STC in around June-July 2016, Lee Hanford, who had acted as Director in my absence, reported no particular concerns or issues to me or expressed any opinion of the sort Michelle Brown says she expressed to me. I never thought there were people behaving in the way shown in the Panorama programme, there was no evidence to suggest there was.

Management Structure

24. In terms of the management structure, there was the Centre Director who reported to Managing Director Custodial and Detention Services of G4S. Reporting into the Centre Director were the Deputy Director who was the Head of Brook House,

Witness Name: [Witnesses full name]
Statement No: [INSERT]
Exhibits: [INSERT]

Head of Tinsley House, Head of Security, and Head of Care and Regimes. The Heads formed the SMT and each Head managed their own team of direct reports.

25. The composition of the SMT changed over time but the management structure and reporting lines generally remained unchanged.
26. [VER000218 at paragraph 167 to 188; VER000256; VER000230] Members of the SMT were encouraged to be visible and to walk around Brook House as much as possible. They were encouraged to go into their areas, onto the wings, eat with detained persons. Some members walked around more than others depending on their roles. They may not have done this as often as they should have, I cannot say, but they were encouraged to do so and generally, I believe that members of the SMT were visible.
27. Duty Directors have a responsibility to go to every place in Brook House operationally every day. They had to sign a logbook to say they had been to those places. Other managers had to go to their different areas of responsibility.
28. I tried to walk around Brook House as much as possible. I tried to walk around the wings although I did not feel I had time to do this on a daily basis. I did at least one Duty Director shift a month, I ate with detained persons on the wings and with staff in the staff canteen. I was always available and tried to be as visible as I possibly could, but I accept not as visible as others might consider from what I have now read.
29. The system of appraisal, review and employment performance that was followed was a generic G4S system that was documented. As part of the employment development reviews (EDRs) employees were given objectives and targets to achieve, against which they were measured. They had to achieve 100% of their target in order to qualify for bonuses. There was a view that the appraisal and review of employees was done at pace and was process driven but I tried to make

Witness Name: [Witnesses full name]
Statement No: [INSERT]
Exhibits: [INSERT]

sure there was a level of reasonable scrutiny and integrity applied to the process. There was a push to improve the EDRs and I believe we achieved a better standard in the quality and staff engagement of reviews.

30. [VER000256 para 389] The level between DCM and the next level up was quite a large gap. The structure of a small SMT group, a number of DCMs and a bigger pool of DCOs is typical of the structure that exists.
31. [VER000256 para 388] I do not agree there was a lack of senior management oversight or that staff thought they could do what they wanted.
32. I completed staff reviews of my direct reports and I completed grandparent reviews. These followed a G4S template that set out the activity areas to be reviewed jointly between appraiser and appraisee; it identified areas of interest and areas for training and development; it set objectives and identified actions to be taken to achieve those objectives. The review invited comments from the appraisee which were discussed during the review.
33. [CJS004060, pages 28 to 32; 34 to 43; 100] I cannot now recall how my involvement with DCO Connolly's employee review came about, it may have been that his line manager was not available or there was issue trying to complete all EDRs by a certain time. I would not have conducted DCO Connolly's employee review as a matter of routine.
34. I cannot recall the circumstances of my involvement with the review, I am sure I would have conducted it based on information that was available to me at the time.

Communication

35. [VER000216 para 248] Morning briefings were held every morning at 8.30am in my office. They were typically attended by between 12-15 people including members of the SMT, representatives from each of the first line operational

Witness Name: [Witnesses full name]
Statement No: [INSERT]
Exhibits: [INSERT]

managers including Oscar 1 who managed front line incidents and Oscar 2 who managed reception and discharge. The morning briefings were also attended by a representative from Healthcare and a representative from the Home Office. I initiated the attendance by a Home Office representative for reasons of transparency and inclusion in reporting and planning.

36. I sent out messages at those briefings around the importance of doing our job professionally and compassionately. The human element was very important to me. I also talked about accountability and the need to have to justify our actions.
37. Morning briefings were attended not solely by Senior Managers but also other members of staff including first line managers, Chaplain, Safer Community manager, Diversity manager. All attendees were required to cascade down the contents and actions of the briefings to their reports and teams, and there was an expectation that they do so.
38. There was also the staff handover meeting first thing, usually attended by staff coming on duty, to be briefed by the Oscar 1. Steve Skitt, Michelle Brown and Juls Williams typically attended the staff handover meeting too and Duty Director.
39. Staff forums were held monthly in the visits hall and were attended by all the staff teams that could be released at that time of day. We tried to hold the forums during times when detained persons were in their rooms to get as many staff as possible to attend. Minutes were taken and actions noted and taken forward. The staff forums provided an open floor for staff to ask any questions they wanted.
40. Staff were given every opportunity to ask any questions at any time at the morning briefings and staff forums, and outside. I also held an informal forum "Breakfast with Ben" to which staff were invited and I saw staff when handing out Employee of the Month awards.

Culture and environment

8

Witness Name: [Witnesses full name]
Statement No: [INSERT]
Exhibits: [INSERT]

41. I remain of the view that generally, staff at Brook House were professional and they were concerned about the welfare of detained persons. They were there to perform a function, it was not their decision why detained persons were there or which detained persons came to us. Detained persons came from diverse cultures and religions and staff were expected to be respectful of the diverse cultures and religions. Staff were there to look after detained persons and support them whilst they were at Brook House. I did not think at the time there was anyone who did not want the best for detained persons.
42. There were some good managers and some good people too but clearly there were some poor ones. It remains my view that the majority of people at Brook House were devastated and appalled by the Panorama programme, they were floored by it. The majority were doing a good job.
43. [VER000216 para 176] When I arrived at Brook House in 2012, there existed a culture of staff members bringing grievances rather than talk through issues. I tried to encourage more open discussion between staff members, to have more open challenge with one another over issues and behaviours rather than go down the route of bringing grievances. Generally I tried to promote a culture of openness, of good behaviour, professionalism and of empathy.
44. The leadership values in Brook House were of professionalism, fairness, compassion, respect, dignity and equality.
45. There were two parts to my tenure as Centre Director, the first with Duncan Partridge as Deputy Director and the second with Steve Skitt.
46. [VER000266] I interviewed Duncan Partridge with Jerry Petherick at the time I was joining Gatwick IRCs and he was recruited as my deputy. It was a very difficult relationship and my experience of him was he was very divisive within

Witness Name: [Witnesses full name]
Statement No: [INSERT]
Exhibits: [INSERT]

the SMT. I never felt I had a camp or was in a camp but I felt that Duncan Partridge was trying to establish a camp.

47. Duncan Partridge left in 2015. When Steve Skitt came on board, this was opportunity to start afresh. Steve Skitt was much more mature and he was very loyal. There was no agenda with him.
48. Some of the dynamics between members of SMT needed to be managed but there were good quality members. DCMs were more operationally focussed and I considered there should have been more investment in terms of their management development. Members of SMT line managed many of the DCMs. I did not sense there was a big divide between SMT and DCMs.
49. I do not believe there was a divide between DCMs and DCOs. I felt some DCMs needed to be more engaged with their direct reports in terms of line management and 1:1s, and in their managing their people role. I wanted DCMs to take more control of their line management. There were some DCMs that were more singular in how they went about things, some were more thoughtful and there were others that were very good managers of their people. Some newer DCMs were very good managers of people and the feedback we received from their DCOs was that DCMs were very supportive and very present on the wings, they were very helpful in situations where detained persons were being quite difficult and DCMs helped come and defuse the situation, and they talked about it afterwards in terms of how they could develop and what they could have done differently. At the same time, I think there was feedback that some DCMs were more absent.
50. As regards the relationship between SMT and DCOs, I never felt DCOs could not approach SMT members and my view is they were talking all the time. I did not get sense there was a divide between them.

Witness Name: [Witnesses full name]
Statement No: [INSERT]
Exhibits: [INSERT]

51. Duncan Partridge left and he was replaced by Steve Skitt. I had underestimated the damage done by Duncan Partridge and after he left, I sought to rebuild relationships with certain staff, Stacey Dean and Michelle Brown in particular.
52. There was more investment in staff relations and development of staff, 360s and improving the standard of EDRs. There was an ongoing conscious leaders training programme.
53. I had never had a grievance raised against me before going to Brook House and I have not had one since leaving there. My experience on joining Brook House was very different to what I had experienced elsewhere within G4S and working for West Sussex County Council. I had always worked in an environment where staff members were encouraged to be open with one other and to discuss any problems or issues and resolve them.
54. I found at Brook House that staff members more readily brought grievances against a person, that this more formal grievance route was followed to resolve issues. I believe that the grievance culture was perpetuated by senior leaders in the team such as Duncan Partridge and Stacie Dean by reinforcing the grievance culture rather than seek to change that by role modelling behaviours.
55. This approach of resolving problems and issues existed certainly before I arrived at Gatwick IRCs although it seemed to be more so at Brook House than Tinsley House.
56. I do not know why that was so. Brook House and Tinsley House were very different. Tinsley House had been around since 1990s so a lot longer than Brook House. It had gone through a number of providers, it had a smaller staff team and there were staff who had been there a long time. Tinsley House was quiet, it had a much more open regime, it was softer and more relaxed. Brook House was a much harsher environment, it was designed more like a prison and it felt like a prison. There were four main wings and a much smaller one designed for more

Witness Name: [Witnesses full name]
Statement No: [INSERT]
Exhibits: [INSERT]

vulnerable and challenging individuals. It was a far more oppressive building which we tried to soften but there is only so much you can do with the existing infrastructure.

57. Ready use of the grievance procedure was something I wanted to change. Part of the messaging to tackle this was to encourage members of staff to listen, talk and resolve issues we had. At Medway STC, the approach was one of restorative practice, and improved understanding and communication. This was the approach I sought to encourage at Brook House.
58. I believe personnel changes brought about by Duncan Partridge's departure and the arrival of Steve Skitt helped in terms of grievances from members of SMT. Steve Skitt was more impartial and personable, and I believed that helped.

Reporting and whistleblowing procedures

59. The whistleblowing process and procedures were prescribed by G4S and were set out in a G4S document.
60. I have not seen those processes and procedures since I left G4S but I recall they were prominently displayed on posters in and around the Centre, in lifts, toilets and in notices to staff. They were included in ITC training, were well publicised and members of staff were encouraged to report anything they wanted to through the whistleblowing process, direct to their line manager or confidante. There was guidance issued in a NTS taken from guidance I received from the G4S lawyer, around when to use whistleblowing and grievance procedures or raise issues with their line manager.
61. Any report of a complaint or any issue raised through the whistleblowing process was treated seriously.

62. I have not seen the whistleblowing procedure since I left G4S in 2017 and do not feel I can comment on the changes I would make.
63. [VER000061] I was aware of the complaint raised by David Waldock which was investigated by Richard Allenby, Group Head of Audit G4S. I supported Richard Allenby in his investigation by providing him anything he wanted.
64. I had a reasonable relationship with David Waldock, I do not know why he did not raise issue with me. I recall I was advised not to contact him during the investigation.
65. I cannot recall seeing any report or resolution.

Priorities

66. My responsibilities as Centre Director were set out in a job description. I was required to run Gatwick IRCs, manage the customer and deliver the contract in the way that the initial contract bid anticipated with the expectation that I was to deliver more than the set profit margin with year on year improvement. My priorities included managing the transition after the three top managers left at the same time, providing stability of the operation, improving HMIP outcomes, and reviewing performance reporting and rigour of processes.
67. The focus of G4S seemed to be on targets, profit and on contract delivery. All targets were finance focussed. My briefing from Jerry Petherick when I became Centre Director was that more rigour was required in respect of contract management and leadership at the Centre.
68. I was also conscious that, when I joined, three members of the management team had left and that I was working with a new team. There was a priority to provide continuity and stability. Tinsley House was more settled, it was a more relaxed regime and it was longer established. Brook House was the Centre that demanded

Witness Name: [Witnesses full name]
Statement No: [INSERT]
Exhibits: [INSERT]

more focus and attention, there was a higher volume of detained persons, there were challenging behaviours, and higher throughput, but recognising that Tinsley House also needed attention.

69. My responsibilities remained the same and as Centre Director, there remained a requirement for me to deliver the contract and manage the relationship with the customer.
70. My priorities sometimes evolved according to what was happening at the time. Certainly there were times through the period of grievances with my Deputy Director Duncan Partridge when it was very difficult and my priority was to manage this without it impacting on the staff team and operation. When he left, that priority became rebuilding relationships with staff members. At other times, we were involved in work on bids and there was an expectation we would support that for example the Heathrow IRC bid. Throughout my time at Brook House, there was always a focus on recruitment and retention, doing the right thing in terms of treatment of detainees and effectively meeting contractual requirements.
71. On the operations side, I had an overview of and responsibility for operations but my priorities as Centre Director were wider which is why I had Operational Managers and Deputy Director in place to concentrate on the operations side.
72. There were issues that arose from time to time throughout my tenure that needed focus such as improvement on staff management programme, focus on EDRs, improvement on learning and development, and training.
73. We improved against the HMIP healthy establishment test, those all being reasonably good and some pushing towards “good” outcome ratings. That was the feedback from the lead inspector.
74. We improved the quality assurance and performance management, we were much more in touch with information about performance and how we could evidence it

Witness Name: [Witnesses full name]
Statement No: [INSERT]
Exhibits: [INSERT]

to the Home Office. Staff knew the contract requirements better and there was greater accountability.

75. There was clearer and more reliable reporting internally and externally in terms of management information and progress against action plans.
76. With the benefit of hindsight, there could have been more rigour around the management and review of incidents involving use of force. I tried to implement use of force meetings and I asked Steve to introduce them, but they did not really get established in the way I wanted them to.

Additional beds

77. An additional 60 beds were introduced into Brook House. This followed discussions with the Home Office and an assessment that 60 beds were reasonable on the basis that the rooms were relatively big. A detailed plan of this was drawn up and discussed regularly with the Home Office and in trading reviews. Brook House was an open regime during the day and people could move around when they were not in their rooms, and people should not be held in detention for long periods of time. On that basis, the view was taken that Brook House could accommodate an additional 60 beds into the wings without impacting on space in the wings.
78. [CJS000582] I do not believe that reference in the SMT minutes dated 13 April 2017 to the additional beds having no impact was a conclusion. As I recall, it was more a report from Juls Williams to the SMT reporting on his feedback from staff and detainees at a point in time, it was not a formal assessment.
79. [CJS000583, VER000230] There were two beds in each room and it was the suggestion of the Home Office for a third bed above one of the beds in some of the rooms.

80. There was anxiety from some staff around how to get a detained person down from the top bunk who did not want to come down and around the need to forcibly remove them from the top bunk. This was specifically around situations where a detained person needed to be physically removed as part of their removal from the country. There were other preventative ways of managing this including moving the person to a different room ahead of the removal time, which was not unusual, and seeking any intel about the detained person's attitude and feelings towards removal.
81. I sought guidance from C&R instructor Jack Bannister around this. He had sought advice from NTRG as there was no prescribed methodology in C&R manual. The advice was to apply approved techniques and safely. I am sure there was guidance issued and we briefed staff on it in C&R refreshers.

Staffing levels

82. [VER000227 pages 1; 4 to 9; 15 to 16] John Kench was one of the central Detail Managers. I had a reasonable professional relationship with him. I felt some frustrations around his management of staff but I do not recall ever having any particular conflict with him.
83. [VER000216 para 417] The challenges around staff recruitment at Gatwick IRCs were multiple.
84. One of those challenges was that the IRCs were in a very competitive area. Gatwick airport is a busy airport with many employment opportunities available and more competitive rates of pay. Several members of staff from the Tinsley team left G4S to work at Gatwick Airport. Challenges would fluctuate around local recruitment drives from other employers.
85. All certificated staff had to be vetted and be cleared to be a certificated custody officer by the Home Office and had to be deemed a "fit and proper" person to do

Witness Name: [Witnesses full name]
Statement No: [INSERT]
Exhibits: [INSERT]

this. This meant it reduced the eligibility of the population who could be appointed. They also needed the right value base, competencies, maturity and resilience and be physically able to pass the C&R training.

86. Another challenge is that, in the IRCs, staff are dealing with often difficult people within a secure environment, working rostered shifts including night shifts. The detained persons population at Brook House were some of the most difficult and challenging in the IRC estate. It was hard work and a challenging environment.
87. The recruitment of DCOs was a challenge. DCMs would be promoted from a pool of DCOs and those vacancies were backfilled. DCOs typically were paid about £22,000 - £24,000. The commercial contract dictated that staff at Brook House worked 48 hours week which was right up to Working Time Regulations. We reduced the contracted hours from 48 hours to 46 in association with and support of the trade union so that people did not lose out on money.
88. At the time, there were recruitment issues in all G4S facilities. In trying to overcome the challenges of recruitment at Gatwick IRCs, salaries were important. Salaries were benchmarked to make sure they were competitive and we consulted with HR on that.
89. We discussed recruitment issues in Trading Reviews and in Jerry Petherick's SLT, and around retention bonus payments for new staff, recommend a friend payments and other strategies to help staffing levels.
90. We re-evaluated advertisements to make sure we were attracting the right people and where we were placing the advertisements to make sure they were getting in front of the right people. We advertised vacancies in the local press, in different portals. Typically, we engaged an external agency to manage that.
91. A referral scheme was introduced whereby a member of staff would receive a financial payment for recommending someone.

Witness Name: [Witnesses full name]
Statement No: [INSERT]
Exhibits: [INSERT]

92. We did assessment days in the local hotel where I gave a power point presentation about the IRCs, and candidates undertook formal testing in order to find the right candidates. It was a competency based assessment, there was no particular experience required but we needed people who were empathetic, had the right values including to diversity and inclusion, were resilient and who had good interpersonal and communication skills.
93. A report by HR was submitted on a monthly basis that included details of attrition, number of resignations so you could forecast the level of attrition, which was discussed at HR Meetings and also fed into SMT meetings.
94. There were two central Detail Managers, one of whom was John Kench who had been in post for a number of years. It was the combined responsibility of the Detail Manager and Oscar 1 to deploy staff and prepare the rota. The Duty Director would have an overview of the deployment of staff.
95. Staff levels were openly discussed at SMT meetings and at staff forums including information about how many staff were on ITCs, when they were finishing the ITC to become operational.
96. As with morning briefings, all attendees at SMT meetings and other briefings were expected to cascade down the contents of the briefings to their direct reports and teams.

Absences

97. The absence policy that was applicable at Brook House was a standard G4S policy. We were required to apply it because we were measured on our management of absences as one of the key performance indicators. I cannot now recall the detail of the policy but the expectation was that sickness and unauthorised absence were generally line managed. Ultimately if sickness and unauthorised absence needed

Witness Name: [Witnesses full name]
Statement No: [INSERT]
Exhibits: [INSERT]

to be escalated, it would be escalated to HR and ultimately, Steve Skitt took ownership of it.

98. At the commencement of each year, all staff members were invited to submit their pre-planned leave for the year for the purposes of staff deployment and preparation of staff rotas. Staff members could also request ad hoc leave, which from memory was about 8 days, and there were days for mandatory training such as C&R, First Aid, DCO refresher training. The Centre's Detail Managers had to be informed of these days with some notice so that adjustments could be made to the rota. John Kench did not always have a good relationship with staff members and my impression was that he was not flexible and he could upset them at times. I remember discussing this with him and the benefits of being flexible meant staff would often be flexible back.
99. We always tried to be flexible with staff and ad hoc leave was generally granted unless there were real and genuine reasons not to. If staff were unable to get the day they wanted, there was opportunity for them to talk to other staff to negotiate the day. We also expected there to be some give and take with staff for example with requests for them to do overtime. There was a relationship management side to that.

Retention

100. There were corporate G4S incentives around retention of staff. This was an issue across all G4S establishments under Jerry Petherick and we discussed strategies at Jerry Petherick's SLT. A bonus payment scheme was in place to incentivise people and retain them beyond their probationary period or some other period of service but I am unable to recall the detail.
101. Absence free periods were rewarded and there were length of service awards. There were employee of the month and team of the month nominations, personal

Witness Name: [Witnesses full name]
Statement No: [INSERT]
Exhibits: [INSERT]

letters of thanks were sent to individual staff members for particular work they had carried out and gift vouchers were given.

102. I recall apprenticeships were offered so that people could get professional qualifications as they worked.
103. I could not initiate or negotiate local incentives around the retention of staff, I did not have the authority to do so.
104. I remember we had a recruitment and retention strategy in place which set this out to improve staff retention. This plan included members of SMT and those reporting to them, identifying members of staff to be mentors or buddies for newcomers. I believe I put together a plan with HR that was shared at the trading reviews.
105. [CJS000536] I cannot recall if employee of the month and team of the month awards were my initiative or something I introduced from seeing in place elsewhere. They were not uncommon and certainly I thought it was a good thing to have.
106. My opinion on the impact of those initiatives is that it was a good thing. Staff like to be told when they are doing well and they should be told when they are doing well. The awards were not simply a means by which people canvassed for nominations, it was important there was integrity in the awards and that good work was recognised. Nominations for the awards were discussed at SMT meetings, and employee and team of the month winners were invited to collect their awards.
107. [CJS000555] The desire was to support staff more effectively and improve staff engagement and staff retention at both Brook House and Tinsley House. We looked at different ways of doing so including staff forums and staff focus groups, we encouraged managers to be more visible, we sought to improve management of staff.

Witness Name: [Witnesses full name]
Statement No: [INSERT]
Exhibits: [INSERT]

108. I remember a poster and discussing it in the SMT but I cannot remember the outcome.
109. [CJS000583] Bryony Farey was the external HR business partner. We looked at the recruitment and retention strategy and plan together.
110. A recruitment and retention strategy was produced, which examined the reasons for attrition and identified ways to improve this.

Incidents

111. I was always made aware of serious incidents as defined in contingency arrangements and my reporting requirements up to Jerry Petherick or whoever was Duty Gold. There was a reporting form to complete, which listed the types of incident to report and how to report it.
112. I did not necessarily attend all incidents I was informed of. I did not see this as my role although I would sometimes observe from the Control Room or command suite if it was opened. Debriefs were held after each incident to discuss what happened and learning points arising from the incident.
113. The stage at which I would be informed depended on the time of day, nature of the incident, but typically when a “hold” had been put in place. This is part of the Management of Serious Incidents training “hold, plan, act” methodology.

Relationship with Detained Persons

114. [CJS000768_10] Detainee Consultative Meetings were held monthly and were minuted. They were typically attended by Juls Williams, Michelle Brown and representatives from the detained persons group although sometimes there was a lack of interest from detained persons. The purpose of the group was to bring

together representatives from the detained persons groups for them to raise any issues or concerns they had. It was the responsibility of managers attending the meetings to take matters forward.

115. Issues arising were typically fed into the SMT by Juls Williams as part of his Residential update.

116. The effectiveness of the meetings was probably mixed but certainly in terms of providing a forum for detained persons so they had opportunity to raise anything they wanted, then that must be reasonably effective.

117. They were advertised on notice boards, minutes were published and available on wings. In their 2016 inspection report HMIP noted “Regular consultation meetings were held, with Home Office and health care representation, but they were not consistently well attended by detainees”.

118. [CJS000575] Generally, I considered the relationship between staff and detained persons was good. This was supported by HMIP in their inspection as reported in November 2016. From the minutes, there were challenges in isolated areas of the Centre which we took some positive action to address.

119. Detention Service Orders (DSOs) are issued from the Home Office. I remember the food and fluid DSO being circulated for implementation.

120. Previously Fluid and Food Refusals (FFR) were managed via the ACDT process and this DSO sought to change that, which was a significant improvement. It also sought to address a spate of detained persons using FFR to protest and try to force release from IRCs.

121. The management of food and fluid refusals was part of safer community and was overseen and implemented by Michelle Brown.

122. Quarterly Child Protection Welfare Group meetings took place relating to Tinsley House due to the family suite. There were no children at Brook House. There was a process in place when detained persons claimed to be children to ensure necessary safeguarding arrangements were put in place.

Violence against staff

123. [CJS000536; CJS000462; CJS000555] Violence of any sort including violence against staff was taken very seriously by all staff including SMT. There was zero tolerance to violence and certainly, we wanted the Centre to be a safe environment for everyone both staff members and detained persons alike. We had a violence reduction strategy in place, which was communicated to staff.

124. There were no punitive measures for detained persons who had been violent. We always tried to defuse the situation, calm things down and speak with detained person if possible. A detained person who used violence against a member of staff was separated in order to manage the risk of any further violence and was subject to an assessment before they were able to return to the population in line with the requirements in the relevant DSO. If they were deemed unsuitable and presented a continued risk of violence towards staff or other detained persons, we recommended to the Home Office that they be moved to another IRC.

125. Incidents of violence against a member of staff were typically reported to the police.

126. I never got any sense and was never aware of any incident of staff dispensing their own justice or punishment.

127. I believe the measures taken at Brook House in response to violence by detained persons against staff were not an entirely effective deterrent given that Brook House accommodated some of the most difficult and challenging detained persons

Witness Name: [Witnesses full name]
Statement No: [INSERT]
Exhibits: [INSERT]

and given the challenges presented by the continuous throughput of detained persons. I raised issue with the Home Office about how difficult it was to manage the most challenging detainees with little consequence or incentive and questioned the suitability of some detained persons in the IRC estate.

128. There were very limited options to incentivise good behaviour or consequences for negative behaviour, which was very much felt by staff. Strategies in other custodial environments such as in prisons were not available in the immigration removal estate. These limitations were understood and appreciated by the Home Office.

129. There was a violence reduction plan in place that was briefed to staff. Every reported assault was investigated including talking to member of staff, reviewing incident reports and any video footage, with lessons learned and support for the staff involved.

130. Any acts of violence were discussed at monthly security meetings attended by representatives from all disciplines.

131. SIRs were written and potentially violent detained persons were highlighted to staff.

Detained Persons' complaints

132. Complaints from detained persons were handled by the Complaints Clerk, Karen Goulder. We never referred to detained persons by number, it was always by name.

133. All complaints were sent to Home Office who filtered out and distributed the complaints to the appropriate place.

134. Any complaints against Brook House were allocated to the most appropriate member of staff. Any complaints about a member of staff were flagged to me.

24

Witness Name: [Witnesses full name]
Statement No: [INSERT]
Exhibits: [INSERT]

135. I did not get involved in every complaint but I expected any particular concerns to be brought to my attention including any substantiated. I did occasionally look at the paperwork. I reviewed complaints on a monthly basis and to identify if there were any trends. I would want to know if a member of staff was featuring regularly in complaints from detained persons.

D1467's complaints

136. I was aware Peter Small was in the Centre investigating members of staff who had appeared on Panorama. Paul Kempster was my line manager at the time.

137. Simon Levitt was resident Deputy Manager for Home Office. He often attended the morning briefings and was part of operational briefing. We would typically talk with him or Paul Gasson about the more difficult to manage detained persons on the estate and the process of managing them.

138. [SXP000159] My knowledge of the G4S led investigation into D1467's complaints is minimal.

139. I have only a vague recollection of the detained person and the circumstances relating to his complaint. If the detained person had been assaulted, the assailants would have been removed from association and I would have been involved in discussions around transfers to other establishments.

140. I am sure Michelle Brown and Steve Skitt raised the allegations with me. I am sure we increased staff searches including inviting the police to participate in them with detection dogs.

141. I am unable to recall specific detail about the incident in December 2016. Ultimately, actions were taken involving the assailants being separated and transferred, and the detained person receiving medical attention.

142. Similarly in relation to the incident in January 2017, an investigation took place and mediation was conducted. I do not recall any further information.
143. Persons who had access to the Control Room were duty Control Room operatives, Operational Managers and Duty Director. A log was maintained of persons accessing the Control Room.
144. I would attend the Control Room when I was Duty Director as part of my rounds around the Centre, when I wanted to watch CCTV, or during an incident that I wanted to watch. Also I would attend if the Command Suite was open to have a view of the Centre.
145. I do not recall contact with DCO Tamzine McMillan in the Control Room.

Activities and entertainment

146. The Activities Steering Committee was devised to bring together members of staff from different disciplines and detained persons to discuss activities and events and to give opportunity for detained persons to have input into their activities. From memory we were not required to have this Committee under the contract but thought it a useful and consultative initiative.
147. Meetings were attended by detained persons and staff. From memory they were held quarterly.
148. I do not think I ever attended a meeting of the Activities Steering Committee.
149. Activities available at Brook House included gym, outside courtyards where people played sport, television rooms, classrooms and internet rooms. We had teachers and supervised access in the internet rooms which was part of the contractual requirement. Themed events were held such as Brooks Got Talent, and barbeques were held. The activities were not prescriptive, the Committee and

Witness Name: [Witnesses full name]
Statement No: [INSERT]
Exhibits: [INSERT]

meetings were a means by which detained persons could have a say about the activities they wanted or give feedback on the activities being provided.

150. The provision of activities was important. We prioritised core activities and those that would help with the core Home Office removal process. If we were short on activities, we would not stop educational or IT services and activities because they were key for the detained persons. We would manage the provision of other activities for example if we were unable to have one of the yards open, we would manage that because other activities were available still such as the gym, arts and craft.
151. We did not remove any roles within activities; when people moved on from those roles, the roles became vacant which we tried to fill. The activities team was a small team as well so any reduction in numbers had a greater impact and we started pulling people from across other teams.
152. Activities could have been done better by being better structured. With hindsight, we could have been more proactive and organised activities better rather than at times, give detained persons a football or cricket bat and ball. It was difficult sometimes when there were staffing issues and it was probably reflective of recruitment issues which were difficult.

SMT meetings

153. [CJS000462; CJS000492; CJS000501; CJS000536; CJS000555; CJS000575; CJS000582; CJS000583] The purpose of the SMT meetings was to bring all heads of department together into one room to discuss all manner of issues affecting the running of the IRCs including security, performance, safeguarding, HR, facilities, staffing, residential issues. The meetings also enabled the heads of department to understand what the current issues were, discuss what issues they were finding difficult and any initiatives to tackle the issues in the forthcoming months. Heads

Witness Name: [Witnesses full name]
Statement No: [INSERT]
Exhibits: [INSERT]

of department were invited to give departmental updates and actions arising. It was also a means of sharing information and I would often report back on meetings I had with the G4S senior management including trading reviews, meetings with the Home Office and other external bodies.

154. The meetings were held monthly and calendar appointments sent to attendees at the start of the calendar year. Typically they were held in my office, chaired by me and minutes were taken by my PA and distributed to attendees and apologies.
155. There was a set agenda for the meetings which would usually start with a review of previous minutes before moving onto matters arising, departmental updates. Any member of the SMT could contribute anything at any time.
156. SMT meetings could sometimes be long, up to 4 hours.
157. SMT meetings were quite difficult meetings to chair at times, the dynamics between some individuals was quite difficult.
158. [VER000218 at paragraphs 129 to 131] There were times when the meetings could have been left with a clearer outcome nevertheless I considered them to be generally effective, particularly in bringing the different heads of department together to understand the issues that we were facing at any particular time.
159. Actions were followed up by the action owner outside of the forum of the meetings, it was not just the meetings where actions, action plans and outcomes were discussed and taken forward. Where actions and outcomes were discussed at meetings, they would have been recorded.
160. There was accountability for individuals who did not implement their actions depending on the nature and severity of the issue and the action required to be taken. There would have been conversations between Steve Skitt and individuals about getting things done and I would become involved if necessary. Certainly my

Witness Name: [Witnesses full name]
Statement No: [INSERT]
Exhibits: [INSERT]

preferred style of management was to discuss issues rather than by strict hand but it depended on the issue.

Relationship with SMT members

161. The composition of the SMT changed over time and the dynamics between some individuals was difficult at times. There were relationships and dynamics that needed to be managed and were difficult to change.
162. [VER000216 para 171] There was some tension between members of SMT who I felt retreated into their own areas of responsibility too often rather than work in a more aligned and collegiate way.
163. There was a sensitivity around them when openness and appropriate challenge were more appropriate and a need to be more collaborative. At times, I felt that some managers needed to be told what to do when they should have been more proactive.
164. I believe managers in the SMT should have behaved more professionally and I accept I could have challenged this more however this should be viewed in the context of the legacy of Duncan Partridge and the grievance culture.
165. My approach to management of the SMT was very much how I have described my management style - professionalism, fairness, compassion, encourage people to talk through issues with each other and to encourage others to do so in a reasonable way rather than bring grievances, respect, dignity and equality.
166. In relation to the members of SMT listed as of February 2017:
- Steve Skitt – He was professional and positive. He was well intentioned, some people found him abrasive on first meeting him.

- Michelle Brown – She was quite an influential person. She was reasonable, generally professional. My personal perception is she could be defensive but she cared a lot, she was conscientious. She was part of the wider Duncan Partridge period and Steve Skitt period.
- Sara Edwards - I felt she did a good job and was largely professional. She could be vocal and opinionated but diligent and I felt her heart was in the right place.
- Dan Haughton - He was a good chap, self-effacing, professional, keen to please. He was little bit on the quieter side, he was newer into the SMT position.
- Mark Francis: was Head of Facilities and focused on that. He knew the Centre, he was very competent from a technical point of view. He could be quite vocal in terms of how he conducted himself at SMT level.
- Lorraine Higgins - she replaced my first PA when I joined as Centre Director. I had a good working relationship, she was very organised.
- Michael Gibson - was Audit and Assurance for Care and Justice and was part of Jerry Petherick's SMT. He was supportive and audit focused
- Kalpesh Mistry - He was a good accountant and knew the contract well. He was quiet, he was well thought of, diligent, supportive
- Michelle Fernandes - she was a good HR manager, we had a good working relationship. We spoke on a regular basis around recruitment, employee relations and activities.
- Sarah Newland - became Head of Tinsley House and from time to time did Duty Director role at Brook House. I had a positive relationship with her. She was very capable, ambitious and generally supportive

Witness Name: [Witnesses full name]
Statement No: [INSERT]
Exhibits: [INSERT]

- Juls Williams - as Residential Manager at Brook House, he had quite a large area of responsibility managing all issues of a residential nature. There were some things he did well. He could also become quite defensive and abrupt and there was tendency for him to be more critical rather than giving praise.
- Caz Dance-Jones - she had been DCM for long time. She was respected and trusted, we had good a good working relationship.

167. Any complaints and/ or grievances from G4S members of staff, detained persons, Home Office, IMB, GDWG and/or other external organisations would be recorded and I am not confident I can recall with accuracy the detail.

SMT Performance

168. My expectation of SMT members was that they would perform in line with their responsibilities set out in their job descriptions, have clear understanding of the contract and their areas of responsibilities under the contract, how to manage effectively their areas of responsibility in line with policy and procedures including responding to audit findings and lessons learned, and to carry out their responsibilities with the professionalism, compassion, respect and other leadership qualities I have spoken to.

169. [VER000216 at paragraphs 239, 357, 364 to 365] On a day to day basis, Steve Skitt and his team were responsible for operations in Brook House. The Duty Director would also have daily operational responsibility with the Operations Managers. Ultimately, I had overarching responsibility as Centre Director.

170. [CJS000503, CJS001567; CJS001496 see pages 4, 8, 12 to 13, 17 and 20] There were a number of IT issues that meant detained persons were unable to access the internet. The provision of internet access was important to detained persons for their communications. We would typically have incurred performance penalties

Witness Name: [Witnesses full name]
Statement No: [INSERT]
Exhibits: [INSERT]

under the contract with Home Office but there was a frustration that we were not getting the IT support that we needed both for the benefit of detained persons and in respect of the contract. I got involved to escalate this in the business.

171. As for other operational issues I was made aware of and/or sought to resolve, I recall issues around there being sufficient space for Friday prayers for our large Muslim population. We facilitated this by using the visits hall for Friday prayers. We discussed this with several Imams who were all positive about the work we did with them and with the Muslim population.
172. As mentioned, we had issues around IT and the provision of internet access for detained persons which we tried to fix as soon as we could. I recall the issue was with the network provider and from memory, we did a work around with increased supervision although I cannot remember the particular detail.
173. We kept detained persons informed of IT issues and we discussed the issues in the morning briefing which Home Office attended and we raised with Home Office direct. Having initially been made aware of the issue, I became involved when the matter needed to be escalated, to understand how quickly it could be resolved, to manage expectations of the detained person population and Home Office, consider what be done in the interim.
174. Aramark was a key partner for G4S, providing catering, cleaning and other services. The two organisations had worked together for many years. The whole award of contract was dealt with at Group level, I had no involvement with it.
175. Steve Skitt met with the Aramark manager for Gatwick on a regular basis to talk about service issues. Some of the issues that were picked up by Steve Skitt included around food. Food was very important as a basic need to residents and there was a staff canteen as well.

176. I had regular conversations with Steve Skitt who raised matters with me if he required my assistance.

Duty Director

177. The Duty Director is the most senior person operationally on-site including day and night. In order to carry out the role of Duty Director, the person needed to have completed the Management of Serious Incidents Course provided by HMPPS. The requirements for a Duty Director were set out in the contract including attending all areas of the operation including both Brook House and Tinsley House.

178. The roster was a simple rolling roster. I believe the roster was initially managed by Michelle Brown and approved by me and latterly I managed it. I can remember keeping a tally of rostered duties to ensure it was fairly applied.

179. We tried to organise the roster so that as many people as possible, including senior managers, took on the role and we tried to make sure the shifts were equal. They had to have done the HMPPS course and new Duty Directors were mentored. Senior managers acted as Duty Director typically 1 weekend in 4-6 weeks and 1 day in the week.

180. There was no formal requirement in the contract or in my job description for me to do Duty Director shifts but it was a good thing to do and it was something I wanted to do. It was a good way of speaking with staff and detained persons.

181. When I was Duty Director, I cleared my diary as there was a lot of work involved in terms of the ACDT and Rule 40 reviews or constant supervision reviews. I valued the opportunity to talk with staff and detained persons, be involved in decision making processes, be visible and be involved in all areas of the Centre.

Witness Name: [Witnesses full name]
Statement No: [INSERT]
Exhibits: [INSERT]

182. There were times when I was required to be involved in incident management depending on whether the incident was a serious incident.
183. The incident on page 23 of CPS000025 was a typically straightforward incident. I was Duty Director that day. The incident would be recorded on CCTV footage and incident reports, and I would need to review these to give detail of whether C&R techniques were used.
184. [CPS000025_25] I do not agree with DCO Tulley's assessment of the incident. I accept there were multiple incidents needing to be managed but I never had the feeling the Centre was out of control.
185. I cannot recall if this incident was discussed at SMT meeting. If it were discussed, it would be minuted.

Training

186. Jane Shannon was the Learning & Development Business Partner for the entire Care & Justice Services. Her role was a central function that covered the Gatwick IRCs and prisons. Jane Shannon was responsible for providing strategic direction for learning and development across the business.
187. Concerning my involvement with the ITC, I always gave a welcome to new starters and if I were unable to do it, Steve Skitt would but it was typically me. There was no power point presentation or script, it was a welcome. Typically I talked about being professional, our values working in the IRC including treating people humanely and with dignity and respect, and I talked about some of the rewards schemes that were in place.
188. I also talked about some of the challenges and risks, of working together, of working in the Centres. Those on the ITC often could not go into centres

Witness Name: [Witnesses full name]
Statement No: [INSERT]
Exhibits: [INSERT]

themselves because they were not cleared by Home Office, so I tried to give as realistic a description as possible. I also held a Q&A. Typically, this lasted last 30 minutes or so.

189. Sometimes I viewed C&R training sessions and sometimes I might attend for pass out when certificates were issued and awards given, to congratulate them.

190. I reviewed the ITC from time to time to see if there were any changes to policy, practice. There was a format for the ITC and I reviewed on regular basis.

191. There was no conscious decision to cease my involvement with the ITC and I did not know I had.

192. [VER000216 at paragraphs 427 to 430] The transition from being on the ITC to working in the Centre understandably involved some anxiety and apprehension for those transitioning.

193. Home Office did not allow anyone in the Centre who was not security clearance checked and without vetting.

194. I thought it really important to train people in the environment.. We introduced an extra week in ITC so that midway through the course, they went into the Centre to get the context for the course. They were accompanied by mentors or coaches, after which they came back into the classroom. I believe that the experience in the IRC environment enriched the ITC course and it softened the impact of when they graduated and started working.

195. A mentoring pack was discussed but I cannot remember if it was implemented.

Development

Witness Name: [Witnesses full name]
Statement No: [INSERT]
Exhibits: [INSERT]

196. The Central team recognised that highly motivated staff meant good staff and were trying to do something about it.
197. DCOs progressed through the ITC. There were annual appraisals where Learning & Development needs were considered and they were appraised against performance.
198. I felt we needed to improve the pathway from DCO to DCM and I spoke with Jane Shannon about this. We looked at the progression and development of a DCO to DCM, at the succession planning process, at grading people as higher performers with potential, identifying, training and experience-based opportunities including acting up in a role, shadowing DCMs on operational roles to understand the nature of work they had to do.
199. We wanted independent accreditations for our staff to achieve a career rather than a job and to professionalise the workforce. Many saw and used the job as a stepping stone to other jobs including public sector jobs. I believe we plugged into NVQs which Jane Shannon was involved in, but I cannot recall how far that got.
200. We were going down the route of apprenticeships and formalising the career development more with Jane Shannon. I introduced a probation tool pulled from Medway to formalise the way management of probation periods and signing off against competencies.
201. Every establishment will experience the same challenges in enabling DCOs to act up at a DCM level and gain experience as DCMs in a supported way. The period for new staff transitioning from ITC to operational was a difficult one and they needed support from existing experienced colleagues and managers.
202. SMT met to identify and discuss talent and succession planning linked to EDR appraisals. We were joined by HR Business Partner who supported this process

Witness Name: [Witnesses full name]
Statement No: [INSERT]
Exhibits: [INSERT]

and provided their input on individuals we had identified with potential to progress based on their EDR outcomes, and development opportunities.

203. The Creating Conscious Leaders programme was introduced by G4S as part of its corporate renewal process following the issue with G4S overcharging for electronic monitoring of offenders. The company significantly invested in the programme for all senior managers within the organisation. For Gatwick IRCs, this was myself, Michelle Brown, Duncan Partridge, Stacie Dean and Nathan Ward.
204. The programme was designed to help people understand what kind of leader they were and how they could be conscious in their leadership.
205. The course involved part coaching with a confidential coach and part reflection, and it involved a 360 degree feedback. There were six day-long training sessions held off-site and participants were paired up with a leadership coach from an external company.

Use of Force

206. I was notified of incidents of use of force through the morning briefings. It was not my role to be directly involved in incidents of use of force however I did review incidents and footage where concerns were highlighted following review.
207. [e.g. CJS000901] Use of force meetings were expected to take place monthly attended by senior manager to review all use of force incidents with the C&R instructor to ensure force was used in a reasonable, effective and justified manner.
208. The meetings did not happen as regularly as they should have. Nevertheless every use of force incident was reviewed by a C&R instructor including review of body worn camera footage, and they were discussed at monthly Security Meetings. They

Witness Name: [Witnesses full name]
Statement No: [INSERT]
Exhibits: [INSERT]

were reported to Home Office within 24 hours and they were reviewed by the Duty Director daily.

209. C&R instructor reviewed all relevant reports in conjunction with body worn camera footage and other evidence that might be available, and met with staff involved as necessary.
210. Undoubtedly there was system in place for reviewing incidents with a designated person.
211. DCM Steve Webb's role was C&R instructor. He was C&R instructor certificated and experienced, he was well qualified to conduct these reviews.
212. Incidents were critically reviewed from a learning point of view. Some reviews threw up issues and concerns which gave confidence they were not just a process driven exercise, that potentially there were investigation concerns and issues.
213. If I reviewed a use of force incident, I would make comment on it. If concerns were raised to me, which would typically be by Steve Skitt, we would discuss the incident and commission a review as necessary.
214. I had previously been a use of force instructor and was involved in working with the National Tactical Force Group in reviewing different systems of restraint and developing a new system and testing it out. I have done C&R training and have knowledge of approved techniques. I have experience of managing and leading in an operational environment. In the circumstances, I believe I have a reasonable standpoint to have an opinion.
215. [CJS004195] I remember attending the C&R refresher with Sarah Newland and Lynn Harthill which took place in the Dojo in Brook House gate house. I am unable to remember much of the detail about the course but there should be training records of who attended and who delivered it.

Witness Name: [Witnesses full name]
Statement No: [INSERT]
Exhibits: [INSERT]

216. It is quite possible that I attended a C&R course after 5 years at Brook House. It was not an expectation of my role to be involved in C&R incidents.
217. [CJS000582; CJS000583; CJS0000915; CJS000575] I am unsure whether there was an increase in incidents involving the use of force in the period 13 April 2017 and 3 May 2017, and if there were an increase, what the numbers were and the data and other information behind the increase.
218. There could be a number of reasons for an increase in incidents including an increase in arrivals, departures and charters. Spikes typically involved particular detainees who were more challenging or suffered from mental health difficulties. Without the information, I am unable to explain the increase in the period 13 April 2017 and 3 May 2017.
219. Monthly figures were produced into a monthly report so that levels of force could be monitored, any reason for use of force understood and whether there was reason for any increase. Also, use of force incidents were discussed at monthly Security meetings.
220. [VER000252_12] There was no indication and no evidence I was aware of to suggest there was excessive use of control and restraint techniques nor indeed use of force in general. This was based on information from reviews conducted, from CCTV footage and body worn camera footage, from discussions with Use of Force instructors, from discussions at SMT meetings and from training I attended which showed justified and proportionate use of force.

Relationship with junior staff

221. [CJS000555] There was an organisation chart which attributed staff members to their line manager and the onus was on each member of SMT to make sure staff members knew who their line managers were.

39

Witness Name: [Witnesses full name]
Statement No: [INSERT]
Exhibits: [INSERT]

222. I was very clear that everyone should know who their line manager was and I remember going through a process of making sure everyone knew who their line manager was, who the DCOs reported to, who the DCMs reported to and it was down to each department head to know the structure.
223. [VER000219] I had some contact with David Waldock. I knew who he was, I spoke to him when I was out in the Centre, and I recall speaking to him in the office one or two occasions.
224. [VER000252_11-13] I do remember Owen Syred coming to me with issues and I remember talking to him in a supportive way. I generally had a good relationship with Owen Syred.
225. I recall we used Owen Syred as part of a pilot about voluntary return scheme opportunities rather than escorted returns. He worked with the Home Office and achieved some success with that.

Security and Security Meetings

226. Neil Davies left November 2016 following an allegation of bullying. He resigned before he was suspended and left with immediate effect before a suitable candidate could be found. Steve Skitt took on the role in an interim capacity and in time, Michelle Brown was appointed Head of Security on 1 June 2017.
227. I believe the vacancy was advertised externally. Certainly when Michelle Brown was appointed into that role, her existing role was advertised externally.
228. [CJS000911; CJS000913; CJS000915; CJS0009170] Security meetings were held monthly in the boardroom.

Witness Name: [Witnesses full name]
Statement No: [INSERT]
Exhibits: [INSERT]

229. The attendees of the meetings were multi-disciplinary including from Home Office, IMB, Home Office Intelligence, as listed in the minutes.
230. I believe the meetings were effective insofar as there was a multidisciplinary approach to issues around security, people were engaged, actions came out of the meetings and were responded to.
231. Security Manager Caz Dance-Jones presented data at the meeting which was captured in the minutes of meetings. Incidents, use of force, assaults, security intelligence reports, contraband found and trends over the previous 12 months were viewed and we would seek to explain those trends. Strategies included intel gathering, management of particular detained persons, and violence reduction.

G4S Leadership

232. The focus of G4S was very much on contractual delivery; on performance, budget and targets. All targets, incentives and penalties were financial. This is what I, as Centre Director, was expected and required to deliver on.
233. There was very little in the culture of G4S that was about people. For example, in relation to the Creating Conscious Leaders Programme, there was talk about the need to get the right people and the best people in, about values and about how people were managed. In reality all objectives and targets were finance focused and performance driven. That was where the pressures were focussed.
234. In the wake of corporate renewal activities, we challenged the financial nature of bonus objectives which Jerry Petherick appeared sympathetic to but was unable to influence.
235. Generally speaking, the Gatwick IRCs did not experience many problems, there were no major safeguarding or other issues. The Centre was well performing

Witness Name: [Witnesses full name]
Statement No: [INSERT]
Exhibits: [INSERT]

against key indicators, audit and inspectorate reports and contract delivery. As a result, Gatwick IRCs were not visited frequently by G4S senior management.

236. Jerry Petherick was my immediate line manager. I would describe our relationship as very much a line management relationship rather than a coaching type relationship. I believe Jerry Petherick was very much of the view that I was the Centre Director and it was for me to manage. He could have been more supportive and provide more strategic direction in that regard.
237. He could also be very short, sharp and robust at times. I had some difficult and uncomfortable conversations with him at times which typically were around appropriate scrutiny and challenge. I found he was quite intolerant to weakness, I did not consider I could show weakness to him.
238. Jeremy Petherick was always very busy, he was very driven, working very long hours and he never seemed to tire. We had a good level of conversation on different issues that were occurring but I would generally pick my timing to be respectful of the complexity of his workload.
239. Jerry Petherick visited Gatwick IRCs infrequently. He attended quarterly contract review meetings and when he did, typically he arrived early and we would have an early coffee and a chat. I would give him the headlines of the contract review, of performance and financials so there were no surprises at the contract review meeting itself.
240. When Jerry Petherick attended Gatwick IRCs for the contract review meetings, he also attended the morning briefing. He would always sit and listen in the morning briefing and observe how I managed the briefing. He very occasionally walked around the Centre.

Witness Name: [Witnesses full name]
Statement No: [INSERT]
Exhibits: [INSERT]

241. I had a good relationship with Lee Hanford, we got on well together. Lee Hanford knew prisons well, he knew about commercials, he sat in trading reviews. He has good operations perspective and acted as gold commander in operational reviews.

Trading reviews

242. [VER000216 paras 44, 54, 79, 115-118] Trading reviews took place monthly in Birmingham and were chaired by Jerry Petherick.

243. They were attended by the Managing Director, Commercial Director, Head of Finance, Management Accountant, HR Business Partner and H&S Manager.

244. I normally attended with my deputy Steve Skitt and Kalpesh Mistry and usually HR Michelle Fernandes who joined remotely. Sometimes one of the managers attended for experience and to give them insight of the governance and reporting structure, and the challenges we faced. They could always talk about their departments far better than I. I recall taking Michelle Brown or Stacie Dean on occasions.

245. I attended to present on key issues such as financials, contract performance, HR, health and safety. The presentation was contained in a 70-80 slide power point that was circulated in advance of the review. I was given a two hour slot in which to go through the power point, highlighting the executive summary, key issues and items for discussion. Jerry Petherick or a member of his team dictated what they wanted to run through during the review based on their reading of the power point material beforehand. I went through department updates in preparing for trading reviews and it would take several days putting the pack together.

246. We were very transparent in reporting any performance failures. Through the course of my time as Centre Director, we developed a much more robust contract assurance model for the Home Office to monitor the contract.

Witness Name: [Witnesses full name]
Statement No: [INSERT]
Exhibits: [INSERT]

247. There was quite rigorous scrutiny of contract performance at the trading reviews. Any feedback or actions were taken back to Gatwick IRCs.
248. I provided feedback from every trading review to members of SMT at our meetings whether that feedback was positive or negative.
249. Typically, there were actions that one of the attendees took notes of and circulated following the meeting. There were normally a handful of actions that would come out and these were circulated.
250. On a personal level, one impact of the meetings was that a considerable amount of my time was taken up preparing for the meeting and attending the meeting itself, which meant that this was time not spent on the Centre.

Grievances and/or complaints against you

251. [CJS000494, VER000248 para 32] I interviewed Stacie Dean with Nathan Ward, Head of Tinsley House, who she reported to. Her background was in the prison service and she was given the role of Residential Manager at Tinsley House.
252. My relationship with Stacie Dean was good initially. The situation with Duncan Partridge, in which he encouraged people to take sides against me, had an impact and latterly my relationship with Stacie Dean became difficult at times. Other times it was better. After Duncan Partridge left, I tried to improve relations with her.
253. Stacie Dean brought two grievances against me, the first she withdrew. From memory, her grievance was around the role of Head of Tinsley House which she wanted rather than move to Brook House to become Head of Security. I had a discussion with Jerry Petherick about Sarah Newland becoming Head of Tinsley House. Sarah Newland had managed the pre-departure accommodation, she had a lot of experience and was on a higher grade to Stacie Dean.

Witness Name: [Witnesses full name]
Statement No: [INSERT]
Exhibits: [INSERT]

254. When I told Stacie Dean about Sarah Newland's appointment as Head of Tinsley House and that she was to become Head of Security, I believe that precipitated her grievance. Sarah Newland's appointment was supported by G4S management and the Home Office. With hindsight and from Stacie Dean's point of view, this could have been managed better, something I accepted at the time.
255. I am unclear of the provenance of document CJSJ000601, I do not believe I have seen this before.
256. I am unable to assist with timings in any event.
257. [VER000263, pages 18 to 19; VER000102] Duncan Partridge was recruited as my deputy. He started enthusiastically and positively but that relationship became difficult and one where I did not feel I could trust him. At the heart of it, I believe, was he had wanted the role of Centre Director and thought he should have it but ended up as my deputy. I felt he was actively trying to undermine me in my role and with staff members.
258. There was a point when I lost my trust in him. He brought a grievance against me, which I have not understood, and he persuaded my then PA to give him access to an email from my email account that he used in support of his grievance against me.
259. He must have spent an inordinate amount of time putting together his evidence files against me, but I remain unclear what the grievance was about and it was not substantiated to my knowledge. I understand he subsequently raised grievances against Lee Hanford and Jerry Petherick, but I do not know the details.
260. It was a relief when Duncan Partridge left but I have no doubt that he left with an impact on my relationships with staff members in particular Stacie Dean and Michelle Brown.
261. [VER000102] Generally I had a good relationship with Michelle Brown but it could be difficult at times. My relationship with her certainly improved after

Witness Name: [Witnesses full name]
Statement No: [INSERT]
Exhibits: [INSERT]

Duncan Partridge left. We had open and frank discussions about moving forward and arising out of the Creating Conscious Leaders Programme.

262. I cannot remember what the grievance was about, it may have been around working hours.

263. Zen Awan was the PA when I arrived and left in 2012 to work with the previous director.

264. I have not understood the relevance of this question.

265. Katie Rix was HR Advisor when I arrived and she was ultimately managed by the HR Business Partner. She redeployed in 2013.

266. I have not understood the relevance of this question.

267. Charlotte Bovill was my PA for a time. She was encouraged by Duncan Partridge to hand to him an email of mine which he used in his grievance against me.

268. I have not understood the relevance of this question.

269. Nathan Ward was Head of Tinsley. I had known him since 2002 from my time at Medway STC where he was a youth worker and Enrichment Manager. On the face of it, we had a good relationship.

270. I believe Nathan Ward brought a grievance against me after he left. That grievance went to Jerry Petherick and I believe I learnt of it after I left G4S. I do not know what it was about or the outcome.

Relationship with the Home Office

271. [VER000216 para.17] Prior to 2012, during my time at Medway STC, the contract between G4S and the Home Office was not robustly managed. This was the initial feel when I joined Gatwick IRCs in 2012.

46

Witness Name: [Witnesses full name]
Statement No: [INSERT]
Exhibits: [INSERT]

272. After G4S became embroiled in serious fraud issues around electronic monitoring after which, management of the contract became far more rigorous, far more performance orientated and finance focussed. This followed an audit commissioned by the Cabinet Office which was highly critical of the Home Office's management of the contract and there was a distinct change in HO behaviour. We developed a performance monitoring methodology which involved daily and monthly reports to a quality assurance manager, and these reports were discussed at SMT. Paul Gasson and his Home Office team were co-located at Brook House. Steve Skitt and I met with them regularly. I reported very transparently with the Home Office and fully accepted penalties when they were justifiable. I had an honest and open relationship with Home Office managers and worked hard to improve and develop this, while acknowledging the different roles.
273. [VER000216 para.126] Home Office did not like and were reluctant to walk around the Centre very much because detained persons tended to stop officials they saw walking around the Centre. Fundamentally the biggest issue detained persons had was with the Home Office as they wanted to know progress with their case.
274. It was important to me, and given my social work background, that people were looked after. For example, if a detained person was being released and had nowhere to go, we were told by the Home Office we had to release them and they had to leave. We made sure their welfare was looked after in the short term when they left the Centre.
275. In time, the Home Office developed a more formal process around adults at risk and meeting welfare needs which helped to provide focus.
276. [VER000216 at paragraphs 126; 129; 145] I had a good professional relationship with the Home office. My approach was to be open, honest and transparent with them. We talked about any issues we had, and we were open about any performance issues or any mistakes and accepted the contractual consequences.

Witness Name: [Witnesses full name]
Statement No: [INSERT]
Exhibits: [INSERT]

277. We worked in partnership with the Home Office.
278. There was a good working relationship between senior managers and the Home Office, and the Home Office in Brook House from both an operational perspective as well as a contractual perspective.
279. [CJS004575, CJS004576, CJS004577, CJS004582] Brook House's performance was measured by reference to a set of key performance indicators set out in a performance schedule under the contract. Many of the KPIs related to the Home Office process of removal and progressing detained persons' cases such as visits, releasing and removing detained persons, admitting them within a particular timescale, whereas others were around regime delivery, and staffing.
280. Certain penalty points attached to levels of performance measured against those performance indicators which translated into a monetary value being a percentage of the revenue.
281. Performance was measured by reference to audits and inspections by Home Office and HMIP.
282. The penalty points system is fairly typical as a measure of performance within a contract. The system as it applied to Brook House was fairly unforgiving; there was no real room for error and any failure was financial. I had no real opinion on it; it is one we were required to follow.
283. It was important that senior managers and staff were familiar with the contract from an operational performance point of view, and it was something I encouraged. The assurance booklets we introduced were designed to make DCMs and managers more aware of the contract. Staff training on policies and procedures was focussed on contractual and regulatory requirements. Also, I recall Michelle

Witness Name: [Witnesses full name]
Statement No: [INSERT]
Exhibits: [INSERT]

Brown was involved in an exercise with DCMs to make them more aware of and understood the contractual requirements.

284. It is not a reflection of my view that G4S prioritised commercial concerns over the welfare of detained persons.
285. [CJS000582, CJS000462, CJS000580, and VER000216 at paragraph 112] I cannot recall how often Gatwick IRCs challenged the penalty points under contract dated 11 February 2008. This was ultimately a process of acknowledging a non-compliance, setting out any mitigating circumstances and it was for the Home Office to determine and agree what was applied in penalties and what was not through mitigation. There was an appeal process, but it was used only this once. Examples are provided but there was nothing unusual in how we went about this; it is the same as any other contract.
286. [VER000216 para 145] It was the requirement of the contract. In fact the contract stated 15 mins, but a local agreement was 30 as this was the case in other IRCs including Heathrow. I would only be speculating as to the rationale, but it would be to ensure the case work process continues and enable the HO team to see detainees when required.

Home Office at Brook House

287. [VER000264 p.21] I have taken this question to be about my relationship and the Centre's relationship with the Home Office staff at Brook House. The relationship was positive and professional. The relationship was a formal one but we understood very clearly the roles we played.
288. We were always very honest open and transparent with them.
289. [VER000266 at paragraph 288] I agree with Lee Hanford in the sense that when working with people, you are empathetic and you do feel their pain. I take the view that building relationships with detained persons is a good thing as that helps

Witness Name: [Witnesses full name]
Statement No: [INSERT]
Exhibits: [INSERT]

manage relationships, including being more effective at managing challenging behaviour, support detainees when distressed or self-harming, promoting voluntary returns. We were not interfering in the case work process and we did not take sides; we were making sure that people we were looking after were looked after. We passed no judgement on detained persons as to why they were at the Centre. Those decisions were made elsewhere, it was our responsibility to look after them whilst they were with us.

The Bid

290. [CJS000582; CJS000583] The Bid was run by a dedicated Bid Director, external to the Centre, G4S management, SMT and all different subject matter experts were involved in understanding the requirements of the bid, how we could best respond to the bid, reviewing responses and considering solutions. As Centre Director, it was inevitable that I would be reasonably heavily involved with the bid process and there was an expectation from the company that I would do this.

291. [VER000216 para 285] I said in my interview with Kate Lampard and Ed Marsden in respect of the new bid that the figures were “*certainly lower but it wouldn’t necessarily be less people on a wing*”.

292. Profiling work was undertaken to build up a staffing profile based on the requirements in the bid as set by the Home Office. This was completed by experienced profilers, reviewed by me, Steve Skitt, Sarah Newland, Michelle Brown and Lee Hanford.

293. A site plan was produced and initial findings were made as to the number of people needed, where they were needed, and whether the number was operationally viable. I am unable to recall the exact number but there would not have been less people if it was not operationally viable and safe. An assessment would have been based on fewer staff being needed at some times for example

during activities when less staff might needed on the wings, and more staff during mealtimes when greater staff presence was required.

Police

294. I believe there was a good working relationship between Gatwick IRCs and Sussex Police, it was a positive one.
295. Sussex Police had a police liaison officer who mainly liaised through the Security Team and the police were invited to the Security meetings.
296. [paragraph 339 of VER000256] The Memorandum of Understanding was intended to document the working relationship between Sussex Police and the Centre. If the Memorandum of Understanding was not signed off then it was certainly in progress.
297. The type of incidents generally reported to the police involved escape, drugs, incidents of assault, generally any illegal activity.
298. Reports were made through the Police Liaison Officer via the Security team or to the local police station. Police were responsive and generally quite quick to respond.
299. We invited them to the Security Meetings, we talked to them about any intelligence or if we had any concerns about someone bringing drugs in. They helped us with staff searches.
300. I believe the relationship with Sussex Police remained good, professional and cooperative following broadcast of the Panorama programme.
301. We were very open with the police when we learnt about the allegations. Our approach was to be open and transparent with the information we had received, and to fully cooperate with the police without delay.

Witness Name: [Witnesses full name]
Statement No: [INSERT]
Exhibits: [INSERT]

302. I do not remember the visit by Sussex Police on 14 September 2017 and believe I may have left the Centre by this time.

Local Authority and Local Safeguarding Board

303. If there was suspicion that a detained person was under the age of 18 years, there was a safeguarding procedure in place requiring us to report them to the Local Authority who would arrange a social worker to attend and carry out a Merton assessment.

304. Our relationship with the Local Authority was good. I had greater involvement with them through Tinsley House because of the family suite there. There was less involvement with them through Brook House. The Local Authority were not very aware of our existence but I wanted to link with them more and we reached out to them for example, to inform them of the number of vulnerable adults in the area.

305. I cannot recall the frequency of safeguarding meetings between Gatwick IRCs and West Sussex County Council. These were mainly to do with Tinsley House due to the family suite.

306. I would be informed of any safeguarding issues. We had a team that was largely focussed on managing safeguarding issues.

307. Safeguarding was an agenda item and was discussed at SMT meetings as noted in the minutes.

308. The daily handover formed the basis of the daily morning briefing; it included details of anyone subject to bullying whether that person was the perpetrator or victim, and it included details of anyone on ACDT, the plan and review.

IMB

309. IMB meetings were held monthly.

52

Witness Name: [Witnesses full name]
Statement No: [INSERT]
Exhibits: [INSERT]

310. I was regular attendee. Steve Skitt attended in my absence.
311. IMB carried out visits to the Centre throughout each month with different members attending according to a rota. They spoke to detained persons and to staff and they were given unrestricted access. They produced a report and any actions that came out from their visits.
312. The meetings were IMB's meetings which we were invited to give an update.
313. Discussions and outcome of IMB meetings were disseminated at SMT meetings and other forums such as morning briefings, staff forums. IMB members attended these sometimes as well as other meetings, Safer Community.
314. I had a very good, honest and open working relationship with IMB, I found their chair and members were very professional. They performed a very important role and I made sure that IMB were welcomed into the Centre and given unrestricted access. I valued their role very much as they were independent eyes and ears from the Home Office and G4S.
315. [paras. 260 to 263 of VER000256 and CJS000770] I believe that the IMB and the meetings had a positive impact on the running of Brook House. IMB talked to staff and detained persons in a different way to others.
316. Actions from IMB annual reports were included in our consolidated action plan to respond to. Actions were monitored by Michael Gibson and at Trading Reviews If we were unable to implement a recommendation or request, we would always give reasons. There were no formal consequences of a failure to implement a recommendation or request but that did not make the recommendation or request any less important to take forward. We would agree our response to recommendations with the Home Office as some of them were dependent on Home Office policy.

Witness Name: [Witnesses full name]
Statement No: [INSERT]
Exhibits: [INSERT]

317. I believe IMB performed an important role and did a good job.

HMIP

318. HMIP visits lasted for two weeks at a time and they attended in the form of a reasonably well resourced team covering the different areas and disciplines, including Ofsted and CQC. We had a good relationship with HMIP. They were given unrestricted access to the Centre during their visits, there were no areas that were off limits.

319. We had inspection visits in 2013 and 2016. They drew keys and radios and were able to go where they liked. I always appreciated their feedback, they were well informed, had views of good and best practice and we able to provide valuable feedback and ways to improve our service.

320. The Home Office did not always agree with recommendation and there was a process after the inspection where recommendations would be reviewed and a view taken about whether to accept them or not. HMIP inspected against outcomes for detained persons and as such commented on the Home Office and their performance and the escorting contractor as well as us

GDWG

321. Brook House's relationship with GDWG was difficult at times. We supported the declared objectives of GDWG in supporting and looking after the welfare of detained persons however it often felt that GDWG sought to undermine the function of the Centre.

Panorama broadcast

322. Very lengthy and detailed letters setting out allegations were sent out to members of staff. I was sent copies of the letter and I believe they were also sent to the police and head office as well as the Home Office. This was the first I learnt of it.

54

Witness Name: [Witnesses full name]
Statement No: [INSERT]
Exhibits: [INSERT]

I can only speak on my own behalf but my reaction was one of grave shock, surprise and concern at the behaviour, and of the need to properly investigate to find out what happened.

323. We only had allegations at this time. Panorama refused to release any evidence to us. We carried out our own review; we looked at who was on duty at the appropriate time, we looked at footage and other evidence. This was done in conjunction with HR and senior managers.
324. We suspended staff initially. I should make it clear that I was instructed to suspend those members of staff and I was acting in accordance with instructions from above. Our findings from our review of the evidence resulted in disciplinary action taken of some members of staff.
325. I believe I can answer the question in general terms in that I would not have dismissed or suspended staff without first meeting with or talking to them.
326. [VER000230, pages 17 to 19; VER000269 at paragraph 416] I wrote a note to staff following the Panorama broadcast. We increased our visibility around the Centre and support to staff. We spoke at SMT to increase our presence and talk to staff members after the broadcast. We met with detained persons to explain that action had been taken and staff members dismissed, and recognise that it was a very difficult and sensitive time for all. The Care team was more active and on hand to speak with members of staff.

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

Witness Name: [Witnesses full name]
Statement No: [INSERT]
Exhibits: [INSERT]

I am content for this witness statement to form part of the evidence before the Brook House Inquiry and to be published on the Inquiry's website.	
Name	Ben Saunders
Signature	<div style="border: 1px dashed black; padding: 10px; display: inline-block;"> Signature </div>
Date	17 th February 2022

Witness Name: [Witnesses full name]
 Statement No: [INSERT]
 Exhibits: [INSERT]