

<p>1 Monday, 7 March 2022</p> <p>2 (10.00 am)</p> <p>3 MR LIVINGSTON: Good morning, chair. We will now be hearing</p> <p>4 from Darren Tomsett.</p> <p>5 MR DARREN TOMSETT (affirmed)</p> <p>6 Examination by MR LIVINGSTON</p> <p>7 MR LIVINGSTON: Good morning. Can you give us your full</p> <p>8 name, please?</p> <p>9 A. It's Darren Tomsett.</p> <p>10 Q. Thank you. Mr Tomsett, you gave a statement to the</p> <p>11 inquiry <INN000024>. Chair, if I can ask for that</p> <p>12 statement to be adduced in full?</p> <p>13 THE CHAIR: Indeed, thank you.</p> <p>14 MR LIVINGSTON: Mr Tomsett, what that means is that the</p> <p>15 whole statement is in evidence before the inquiry, so</p> <p>16 that I don't have to take you through every line and</p> <p>17 every word of that statement.</p> <p>18 Just to start with some issues about the background</p> <p>19 and recruitment, you worked at Brook House from</p> <p>20 about January 2015 until January 2018; is that right?</p> <p>21 A. That's right.</p> <p>22 Q. You were a DCO for most of it, but you acted up as a DCM</p> <p>23 from about August 2017; is that right?</p> <p>24 A. That's right.</p> <p>25 Q. And then, were you DCM, acting DCM, until you left?</p> <p>Page 1</p>	<p>1 the detainees on a day-to-day basis and everything that</p> <p>2 was kind of involved within working in the centre.</p> <p>3 Q. Thinking back, and I know that it is a while ago now, to</p> <p>4 the training that you received, do you think it painted</p> <p>5 an overly positive picture of life at Brook House?</p> <p>6 A. I don't know.</p> <p>7 Q. Sorry?</p> <p>8 A. Sorry, I don't know.</p> <p>9 Q. You don't know. Given what the training was like and</p> <p>10 what it was actually like at Brook House, did those</p> <p>11 things -- were they the same?</p> <p>12 A. In that case, I think it was slightly different, yeah.</p> <p>13 Yeah.</p> <p>14 Q. Okay. In what way?</p> <p>15 A. Just where the training kind of, like, prepared you for</p> <p>16 your sort of DCO role, I think, but, as I say, when it</p> <p>17 come to sort of, like, the day-to-day working and</p> <p>18 working with detainees, it was -- I don't think we had</p> <p>19 sort of any training with the detainees, as such.</p> <p>20 Q. Okay.</p> <p>21 A. So it would be nice if we could have, you know, spent --</p> <p>22 you know, had a bit of time and learning about them.</p> <p>23 Q. Did you do any shadowing as part of your training?</p> <p>24 A. I think the shadowing was, like, the last two weeks,</p> <p>25 I think it was, just after the training was finished.</p> <p>Page 3</p>
<p>1 A. That's right.</p> <p>2 Q. In your witness statement, at paragraph 4, you say that</p> <p>3 you were attracted to the DCO role because you wanted to</p> <p>4 work with people, and it sounded interesting, and you</p> <p>5 say you enjoyed it when you first started. Did that</p> <p>6 change?</p> <p>7 A. Slowly, progressively, as you -- you know, as you work</p> <p>8 there at the centre.</p> <p>9 Q. You began to enjoy it less?</p> <p>10 A. As I got further on into working in the centre, yeah.</p> <p>11 Q. Why was that?</p> <p>12 A. Just because of the environment, eventually. It just</p> <p>13 sort of, like, weighs you down in the end.</p> <p>14 Q. We will come on to that in a bit more detail in due</p> <p>15 course.</p> <p>16 You say somewhere in the middle of your statement,</p> <p>17 at paragraph 50, that the training that you received</p> <p>18 before starting allowed you to do the job, but didn't</p> <p>19 prepare you for how to cope with the day-to-day at</p> <p>20 Brook House; is that right?</p> <p>21 A. That's right.</p> <p>22 Q. What's the difference between that? Is it that it</p> <p>23 allowed you to do each task but it didn't prepare you to</p> <p>24 cope?</p> <p>25 A. I don't think it sort of prepared you for dealing with</p> <p>Page 2</p>	<p>1 Q. You also say in your statement that when you were</p> <p>2 seconded into the DCM role, so in August 2017, you don't</p> <p>3 feel that you received adequate training or time to</p> <p>4 prepare for that at that stage; is that right?</p> <p>5 A. Yes.</p> <p>6 Q. Did you receive any training on how to be a DCM at all?</p> <p>7 A. No sort of formal training. It was sort of shadowing</p> <p>8 a fellow detention centre manager, and observing and</p> <p>9 watching their role and how they did their job.</p> <p>10 Q. Becoming a DCM, did that give you line management</p> <p>11 responsibility for anyone?</p> <p>12 A. I can't remember. I think it did, yeah. I think it</p> <p>13 did.</p> <p>14 Q. Any idea, roughly, how many people you were line manager</p> <p>15 to?</p> <p>16 A. I can't really remember. Maybe two, two or three.</p> <p>17 Q. So it's not 15 or 20 or anything like that?</p> <p>18 A. No.</p> <p>19 Q. A few people. Okay. Do you recall who was involved in</p> <p>20 the decision that you be seconded into the DCM role?</p> <p>21 A. I believe it was Steve Skitt that interviewed me.</p> <p>22 Q. Was it an application process? So did you actually</p> <p>23 apply to be seconded --</p> <p>24 A. Yes.</p> <p>25 Q. -- or were you asked?</p> <p>Page 4</p>

<p>1 A. Yes.</p> <p>2 Q. Were you told that you should apply or did you just</p> <p>3 decide to apply?</p> <p>4 A. I think the -- I think the role come up and you were</p> <p>5 sort of, like -- you know, "It might be an idea for you</p> <p>6 to consider applying", or something like that, and</p> <p>7 I thought it would be a good step for myself.</p> <p>8 Q. Then you were interviewed by Steve Skitt, which you say</p> <p>9 in your statement, and you got the role as acting DCM?</p> <p>10 A. Yes.</p> <p>11 Q. "Acting" sounds a bit like it was a sort of temporary</p> <p>12 thing. Is that what you were told?</p> <p>13 A. That's right, it was, yeah.</p> <p>14 Q. For how long, were you told?</p> <p>15 A. I don't know. I wasn't -- you know, it was just as long</p> <p>16 as perhaps they needed me and then I would maybe return</p> <p>17 to become -- to a DCO role again.</p> <p>18 Q. Do you have any idea why you were being recruited as an</p> <p>19 acting DCM as opposed to just DCM?</p> <p>20 A. I don't.</p> <p>21 Q. I want to ask you a few questions about your role as</p> <p>22 a DCO first. You talk in your statement about the work</p> <p>23 you did as a DCO and say you enjoyed being in an</p> <p>24 environment with people around, and you describe at</p> <p>25 paragraph 8 of your statement that your role, as you saw</p> <p style="text-align: center;">Page 5</p>	<p>1 it was a managerial decision to house a detainee on the</p> <p>2 induction wing until -- it may be because of having --</p> <p>3 not having enough rooms and they might have been single</p> <p>4 occupants, so they would maybe require a room to</p> <p>5 themselves.</p> <p>6 Q. What were the consequences of someone being on B wing</p> <p>7 for that amount of time rather than moving to one of</p> <p>8 the residential wings?</p> <p>9 A. There was no consequences. It was just the fact that</p> <p>10 there was a room being taken up by somebody that was</p> <p>11 awaiting a charter flight, when, instead, perhaps, it</p> <p>12 should have been used for new detainees arriving.</p> <p>13 Q. So, presumably, the consequence could be that people who</p> <p>14 were due to be on the induction wing then couldn't stay</p> <p>15 in the induction wing because there was already someone</p> <p>16 in --</p> <p>17 A. Because there was already someone in the room.</p> <p>18 Q. Do you remember who would make the decision about how</p> <p>19 long people should stay?</p> <p>20 A. I don't.</p> <p>21 Q. I want to ask you about the atmosphere at Brook House.</p> <p>22 Paragraph 10 of your statement, you describe an</p> <p>23 intimidating and aggressive atmosphere at Brook House,</p> <p>24 and then you go on to talk about detainees getting angry</p> <p>25 and aggressive and threatening staff and other</p> <p style="text-align: center;">Page 7</p>
<p>1 it, was to help detainees; is that right?</p> <p>2 A. That's right.</p> <p>3 Q. Do you think that's how your colleagues saw it as well?</p> <p>4 A. Yeah, I think so, yeah.</p> <p>5 Q. Do you think that's how the detainees saw it, that your</p> <p>6 role was to help them?</p> <p>7 A. Yeah, I think so, yeah.</p> <p>8 Q. One of the things you say in your statement at</p> <p>9 paragraph 22 is that people were kept on B wing, which</p> <p>10 I believe was the induction wing, for a couple of weeks</p> <p>11 because a decision had been made from management that</p> <p>12 they were going to stay on that wing for a couple of</p> <p>13 weeks. Is that right?</p> <p>14 A. Wouldn't normally be -- it wouldn't normally be for</p> <p>15 a couple of weeks. Usually detainees, when they arrived</p> <p>16 on the induction wing, it should normally only be for</p> <p>17 a couple of days, maximum, and then they should be moved</p> <p>18 off the induction wing to a residential wing.</p> <p>19 Q. You say at paragraph 22 that, for example, someone who</p> <p>20 had a charter flight in two weeks was being kept on</p> <p>21 B wing until that flight, and you say it shouldn't have</p> <p>22 happened, but it did. Do you know why --</p> <p>23 A. Yes.</p> <p>24 Q. -- people were staying on the wing for two weeks?</p> <p>25 A. It could -- I think, at the end, it was probably just --</p> <p style="text-align: center;">Page 6</p>	<p>1 detainees. Do you think that staff contributed to that</p> <p>2 aggressive atmosphere as well or did you think it was</p> <p>3 just detainees?</p> <p>4 A. I don't think that's something that I thought when I was</p> <p>5 there.</p> <p>6 Q. So you thought that aggression was just coming from one</p> <p>7 side?</p> <p>8 A. It would appear to have, yeah, looked like that, yeah.</p> <p>9 Q. One of the things you say at paragraph 14 of your</p> <p>10 statement, Mr Tomsett, is that "staff needed to show</p> <p>11 they were willing to stand up to behaviour that was</p> <p>12 wrong". What does "stand up" mean to you?</p> <p>13 A. Sort of dealing with abusive and aggressive behaviour</p> <p>14 and sort of being able to show that you're -- you know,</p> <p>15 you're there, willing to deal with the situation, and to</p> <p>16 provide a point where a detainee can make -- you know,</p> <p>17 can see that you're actually trying to, you know, do</p> <p>18 your job and sort of protect others whilst you're</p> <p>19 dealing with, you know, certain situations.</p> <p>20 Q. But, I mean, in practical terms, does that mean sort of</p> <p>21 not backing down, does it mean not walking away, does it</p> <p>22 not mean giving in to requests?</p> <p>23 A. Not all the time. Sometimes you have to stand your</p> <p>24 ground or you de-escalate the situation by talking to</p> <p>25 the detainee. You always try and de-escalate the</p> <p style="text-align: center;">Page 8</p>

<p>1 situation as best as you can.</p> <p>2 Q. Did you think that that was something that set you apart</p> <p>3 from some of your colleagues, that you were willing to</p> <p>4 stand up and others weren't?</p> <p>5 A. Quite possibly. I can only, you know, sort of look at</p> <p>6 how I worked, and with my colleagues, on the wing.</p> <p>7 I don't sort of recollect how others used to work on the</p> <p>8 other wings, but yeah.</p> <p>9 Q. Even on your wing, for example, did you experience there</p> <p>10 were some colleagues who you felt weren't standing their</p> <p>11 ground?</p> <p>12 A. Yeah, yeah.</p> <p>13 Q. What were the consequences of that?</p> <p>14 A. We just ended up having to deal with those situations</p> <p>15 even more, so it sort of kind of looks like it's falling</p> <p>16 back on you all the time to sort of, like, deal with</p> <p>17 confrontation and, you know, issues like that at the</p> <p>18 time.</p> <p>19 Q. One of the things you say, Mr Tomsett, is that you</p> <p>20 received verbal abuse, threats, intimidation and</p> <p>21 violence, and you say that it became a very difficult</p> <p>22 place to work, Brook House. Do you think that,</p> <p>23 generally, you responded appropriately to this</p> <p>24 behaviour?</p> <p>25 A. I think generally, yeah, yeah.</p> <p style="text-align: center;">Page 9</p>	<p>1 intimidation sort of on a -- almost a daily basis.</p> <p>2 Q. So that example there about letting people go onto other</p> <p>3 wings, is that a scenario where you felt that you were</p> <p>4 keeping to the rules by saying, "No, you're not allowed</p> <p>5 to go onto this other wing"?</p> <p>6 A. Yes.</p> <p>7 Q. Whereas other colleagues might just take another route</p> <p>8 and say, "Yeah, fine, go on"?</p> <p>9 A. Yes.</p> <p>10 Q. And you saw other colleagues doing that?</p> <p>11 A. I've seen detainees who've been allowed on -- well,</p> <p>12 I say "allowed". They have entered the wing without</p> <p>13 sort of being challenged about why they're coming onto</p> <p>14 the wings.</p> <p>15 Q. Why weren't detainees allowed to go onto other wings?</p> <p>16 A. It was just one of the rules, where you're not allowed</p> <p>17 to move from one wing onto another wing. They all had</p> <p>18 ID cards. I was just following the centre rules and</p> <p>19 enforcing that.</p> <p>20 Q. It was never explained to you as to why that was</p> <p>21 necessary. Obviously, Mr Tomsett, these aren't</p> <p>22 prisoners. They are people that are being detained</p> <p>23 under immigration rules. Were you ever told about why</p> <p>24 they weren't allowed to move between the wings?</p> <p>25 A. I don't remember, no. No.</p> <p style="text-align: center;">Page 11</p>
<p>1 Q. Do you think you always did?</p> <p>2 A. Not always.</p> <p>3 Q. Maybe we will come back to some of those situations in</p> <p>4 a bit. Is there anything that comes to mind for you as</p> <p>5 to situations where you didn't respond appropriately?</p> <p>6 A. Well, there's going to be some situations that you'll</p> <p>7 look at later.</p> <p>8 Q. Okay. If I don't mention any that you are thinking of,</p> <p>9 then perhaps you can tell us in due course.</p> <p>10 Do you think that -- again, I know that you can only</p> <p>11 tell us about what you experienced around you, but did</p> <p>12 you find that you were receiving more abuse or threats</p> <p>13 from detainees than other staff, or did you think it was</p> <p>14 shared pretty equally?</p> <p>15 A. I suppose, when I look back, I think I was probably</p> <p>16 getting more than my fair share than what others maybe</p> <p>17 were receiving.</p> <p>18 Q. And any thoughts about why?</p> <p>19 A. Because I wanted to follow the centre rules and stand</p> <p>20 there and -- you know, if you're controlling the door,</p> <p>21 for example, if you're not allowed to come onto the</p> <p>22 wing, trying to maintain that control and security for</p> <p>23 the wing and for the detainees that are on there, so</p> <p>24 I just found that I was sort of consistently dealing</p> <p>25 with a lot of confrontation and verbal abuse and</p> <p style="text-align: center;">Page 10</p>	<p>1 Q. You say in your statement at paragraph 42 that having</p> <p>2 a detention centre that looks and runs like a prison</p> <p>3 does not leave detainees feeling too comfortable and</p> <p>4 that new detainees were concerned arriving into</p> <p>5 Brook House. Was there anything you could do, as a DCO,</p> <p>6 to reassure them when they arrived?</p> <p>7 A. You speak to them and just reassure them that, you know,</p> <p>8 you're there to sort of deal with your case and to get</p> <p>9 your immigration case sorted out and, if you needed any</p> <p>10 help, then we were there to assist you and to, you know,</p> <p>11 try and deal with your case as swiftly and as quickly as</p> <p>12 possible.</p> <p>13 Q. So you told them that you would be able to assist them</p> <p>14 with issues with their immigration cases?</p> <p>15 A. Not with their immigration cases. If they needed any</p> <p>16 help in, say, wanting to speak to Home Office or filling</p> <p>17 out forms on the wing, that type of thing. Assisting</p> <p>18 them in those sort of ways, yeah.</p> <p>19 Q. Is that what you saw the purpose of people being at</p> <p>20 Brook House was? They were there to sort out their</p> <p>21 immigration cases, essentially?</p> <p>22 A. For me, yeah, they were being detained because something</p> <p>23 had happened with their immigration status and they were</p> <p>24 there to get it fixed and to rectify it.</p> <p>25 Q. One of the things -- the quotes you give in your</p> <p style="text-align: center;">Page 12</p>

<p>1 statement at paragraph 44, you say:</p> <p>2 "Because it was a prison building, people behaved</p> <p>3 like they were in prison."</p> <p>4 Did that include staff and detainees?</p> <p>5 A. I can't really answer about the staff. But I think with</p> <p>6 some of the detainees, I think a lot of detainees, they</p> <p>7 arrived at Brook House and perhaps a lot of detainees</p> <p>8 had come from, like, a prison environment, which,</p> <p>9 I believe, is probably a lot harsher. So it just seemed</p> <p>10 that, you know, it was a more sort of challenging</p> <p>11 environment, when you're dealing with people that have</p> <p>12 moved from a prison environment into the detention</p> <p>13 centre environment.</p> <p>14 Q. What does "behaving like they're in prison" mean,</p> <p>15 though?</p> <p>16 A. It's just, like, the -- like, an attitude and the way</p> <p>17 they behaved, it just seemed that some people were a lot</p> <p>18 more aggressive.</p> <p>19 Q. Coming on to the issue of staff culture, you say in your</p> <p>20 statement that the overall culture was volatile,</p> <p>21 aggressive, pressurised and tense. And you say that</p> <p>22 morale among staff could alter day to day. What would</p> <p>23 change the morale?</p> <p>24 A. The staff morale?</p> <p>25 Q. Yes.</p> <p style="text-align: right;">Page 13</p>	<p>1 three years?</p> <p>2 A. Yeah.</p> <p>3 Q. You were there the whole time --</p> <p>4 A. Yes.</p> <p>5 Q. -- that Callum Tulley was filming. You have probably</p> <p>6 thought about it when you saw Panorama.</p> <p>7 A. Yes.</p> <p>8 Q. Did you come to any view as to how or why you didn't see</p> <p>9 it?</p> <p>10 A. No, I just spent most of my time working either on one</p> <p>11 wing or another. I wasn't sort of working effectively</p> <p>12 around the centre every day, but I just didn't see</p> <p>13 anything like that going on.</p> <p>14 Q. So was it just coincidence, would you say, that</p> <p>15 mistreatment was going on and you didn't see any of it?</p> <p>16 A. I didn't see it.</p> <p>17 Q. Did you hear about it at all?</p> <p>18 A. No, not as far as I'm aware.</p> <p>19 Q. You say in your statement that Brook House was not how</p> <p>20 it was shown on Panorama. In what way?</p> <p>21 A. Just that you -- it's -- you just sort of, like, see</p> <p>22 only snippets on the Panorama sort of programme, but</p> <p>23 I think, in general, day to day, it was a lot more sort</p> <p>24 of intimidating and sort of an aggressive environment,</p> <p>25 quite pressurised and tense.</p> <p style="text-align: right;">Page 15</p>
<p>1 A. I think it would just depend on, you know, how their</p> <p>2 working day had been and how they were feeling in</p> <p>3 themselves.</p> <p>4 Q. We have heard from some other witnesses talking about</p> <p>5 Brook House as a place where morale was absolutely shot</p> <p>6 and staff morale was, you know, at the very bottom. Was</p> <p>7 that not your experience?</p> <p>8 A. Yeah, I'd say that there was probably staff there that</p> <p>9 had low morale, there was probably other staff there</p> <p>10 that, you know, sort of can just get on with it and get</p> <p>11 through the day no problem at all.</p> <p>12 Q. So it wasn't uniform amongst the staff?</p> <p>13 A. I don't think it was uniform, no.</p> <p>14 Q. You say, Mr Tomsett, at paragraph 34 of your statement,</p> <p>15 that you were surprised by some of the things you saw on</p> <p>16 Panorama, as you didn't see anything like that when you</p> <p>17 were working at Brook House; is that right?</p> <p>18 A. Yes.</p> <p>19 Q. You say that you do not recall seeing mistreatment and</p> <p>20 it would surprise you if it was going on. But we know</p> <p>21 from Panorama that mistreatment was going on; yes?</p> <p>22 A. Mmm.</p> <p>23 Q. So why do you think you didn't see it?</p> <p>24 A. I just didn't see it.</p> <p>25 Q. Have you thought about -- I mean, you were there for</p> <p style="text-align: right;">Page 14</p>	<p>1 Q. Do you think it was more aggressive and pressurised and</p> <p>2 tense than it was shown in Panorama?</p> <p>3 A. I think so, yeah. Yeah.</p> <p>4 Q. Okay.</p> <p>5 A. In terms of coming -- like, some of the behaviours and</p> <p>6 the verbal sort of stuff that you tend to deal with with</p> <p>7 the detainees, yeah.</p> <p>8 Q. So you're saying that it didn't show the detainees being</p> <p>9 aggressive towards the staff; it only showed the other</p> <p>10 way around?</p> <p>11 A. From what I could see on the programme, yeah.</p> <p>12 Q. That didn't reflect your experience of Brook House?</p> <p>13 A. No.</p> <p>14 Q. Just a couple of issues about management, you say at</p> <p>15 paragraph 39 of your statement that you think staff were</p> <p>16 given support from the senior management team and that</p> <p>17 the SMT, the senior management team, would visit the</p> <p>18 wing and spend five to ten minutes there each day; is</p> <p>19 that right?</p> <p>20 A. Yeah, they'd come down to visit you on the wing.</p> <p>21 Q. Every day?</p> <p>22 A. I can't remember if it was every day. I think it was</p> <p>23 most days.</p> <p>24 Q. Okay. Who are we talking about here from the senior</p> <p>25 management team?</p> <p style="text-align: right;">Page 16</p>

<p>1 A. I would imagine it would just be whoever the oncall 2 senior manager -- 3 Q. Duty director? 4 A. -- duty director would be at the time. 5 Q. People like Steve Skitt? 6 A. Yes. 7 Q. Michelle Brown? 8 A. Yeah. 9 Q. Ben Saunders, would he be there? 10 A. I think he's come down once or twice. 11 Q. We have heard from some witnesses that they had no 12 interaction with members of the senior management team, 13 but that wasn't your experience; is that right? 14 A. Yeah, no, they used to come down and speak to you and 15 you'd speak with them, yeah. 16 Q. You say that -- at paragraph 68, you say they were 17 available throughout the day and were on call and they 18 were approachable; is that right? 19 A. Yeah, as far as I remember. 20 Q. So you felt that if you had any issues you could raise 21 it with any of them? 22 A. If they was on call, yeah. 23 Q. Any of the duty directors? 24 A. Yeah, yeah. 25 Q. Anyone working as duty director. But you do say that</p> <p style="text-align: center;">Page 17</p>	<p>1 and a DCM? 2 A. Yes, it was, yeah. 3 Q. When you were a DCO, did you have a line manager? Do 4 you remember? 5 A. I did, yeah. 6 Q. Who was that? 7 A. Off the top of my head, I believe it was possibly 8 Stuart Povey. 9 Q. Stuart Povey-Meier? 10 A. Sorry? 11 Q. Stuart Povey-Meier, is it? 12 A. That's right, yeah. I think it was possibly 13 Stuart Povey, possibly DCM Connolly, maybe DCM Ring. 14 Q. Did you -- what was your relationship like with your 15 line manager? What -- 16 A. Fine. 17 Q. Would they give you actual management? Were there 18 appraisals or performance reviews, or anything like 19 that? 20 A. I believe I had, like, reviews carried out periodically. 21 I can't remember how long, you know, the reviews were in 22 between, but I believe I had, like, PDR reviews carried 23 out. 24 Q. Moving on to the issue of the mental health of detained 25 people and the issue of self-harm, you say, Mr Tomsett,</p> <p style="text-align: center;">Page 19</p>
<p>1 you felt that if you went to the SMT with an issue, you 2 felt that they might have spoken to others about it as 3 well; is that right? 4 A. All I'm trying to say is, I think there was a lot of 5 gossiping going on in the centre, and whether you was 6 sort of senior management or whether you was an officer, 7 I just didn't feel comfortable sort of parting with 8 information that I felt maybe would, you know, sort of 9 go further and someone else might talk about it. So 10 I didn't tend to sort of bring things up. Just keep it 11 to me -- 12 Q. If you had had concerns about a fellow officer, would 13 that have prevented you from raising them with a senior 14 manager? 15 A. No, it wouldn't have done that. 16 Q. Sorry -- 17 A. It wouldn't have prevented me from speaking to 18 management. I would have spoken to a manager if I had 19 concerns over another officer. 20 Q. And that never happened? 21 A. I didn't have any, no. 22 Q. No. You also say, just whilst we are still on 23 management, that DCMs were doing the best they could, 24 you felt. You say that a couple of times in your 25 statement. That was your experience when you were a DCO</p> <p style="text-align: center;">Page 18</p>	<p>1 at paragraph 18 of your statement, that some detainees 2 would threaten self-harm just to get what they wanted; 3 is that right? 4 A. Sometimes, yeah. 5 Q. How did you know that that's why they were threatening 6 self-harm? 7 A. Sorry, can you ...? 8 Q. Yeah. You say they were threatening self-harm to get 9 what they wanted. How did you know that was the reason 10 they were doing it? 11 A. Well, for example, they'd say it because maybe they 12 wanted to speak to someone from the Home Office and it 13 would be, "If I don't get to speak to someone from the 14 Home Office, I'm going to hurt myself", and things like 15 that. 16 Q. What would you do if you didn't think that there was 17 a genuine threat to self-harm, then? 18 A. If I didn't think ...? 19 Q. So someone says, "I'm going to self-harm", or something 20 like that. Are you then assessing whether you think 21 it's a genuine threat to self-harm or not? 22 A. Well, yeah, yeah. You've got to, like, try to ascertain 23 if they're actually -- if they're taking it -- if 24 they're being serious or not over it. 25 Q. And what's the action you take if you think it's</p> <p style="text-align: center;">Page 20</p>

1 a genuine threat, if you think they are being serious?

2 **A. If they are being serious then I'd want to raise an**

3 **ACDT.**

4 Q. And if you don't think they're being serious?

5 **A. If I don't think they're being serious, I may even still**

6 **put them on an ACDT just because they even said it.**

7 Q. Would you always do it if they said it?

8 **A. I think it would just really depend on the situation at**

9 **the time and who you're talking to and sort of gauging**

10 **them.**

11 Q. One of the things you say -- I realise I'm jumping

12 around your statement a bit -- at paragraph 134 is that

13 individuals who self-harmed or said they were depressed

14 or wanted to hurt themselves were seen by healthcare and

15 spoken to in a review and placed on an ACDT or even

16 constant watch. Would you be referring them to

17 healthcare in that scenario?

18 **A. Sorry, can you just repeat that again?**

19 Q. Yes. One of the things you say is that individuals who

20 self-harm or say they're depressed or wanted to hurt

21 themselves were seen by healthcare, spoken to in

22 a review and placed on an ACDT; is that right?

23 **A. It's probably maybe the other way -- like, you'd refer**

24 **them -- sorry, you'd open up, like, an ACDT and then**

25 **they would be reviewed and seen by --**

Page 21

1 Q. When you were being trained both in your introductory

2 course and also your refreshers on use of force, was

3 there any training about particular considerations to

4 take into account when using force against someone with

5 mental health problems?

6 **A. Not as far as I remember.**

7 Q. Coming on to a couple of questions just about staffing

8 levels, you say, broadly, at paragraph 76, that you

9 didn't have enough staff for the work; is that right?

10 **A. I think, in general, yeah. I think we was -- you know,**

11 **you get quite short staffed at times. There were times**

12 **when we had enough staff on, you know, particular days,**

13 **but there were quite a few times when we were**

14 **short staffed.**

15 Q. Is that something that you and your colleagues would

16 talk about?

17 **A. Yeah, I think so, yeah, yeah.**

18 Q. You say at paragraphs 78 to 80 of your statement that

19 short staffing had a big impact on detainees, and so you

20 give an example of it meant they couldn't go outside to

21 get fresh air on occasions; is that right?

22 **A. Yes.**

23 Q. Was that the activities staff that would be responsible

24 for letting them go outside, or would you be responsible

25 as well?

Page 23

1 Q. By healthcare?

2 **A. -- as best as I remember, healthcare. And a DCM would**

3 **be present and they'd do a review with the detainee.**

4 Q. So it's not you directly contacting healthcare. You

5 open the ACDT and they learn about it and there's

6 a review carried out; is that right?

7 **A. You'd open the ACDT first and there was like a process**

8 **that would get followed.**

9 Q. One of the things you say in your statement is that you

10 think it would have been helpful to have more training

11 on how to deal with acts of self-harm, the reasons why

12 people did it and the ways to help people not to

13 self-harm; is that right?

14 **A. Yeah, yeah.**

15 Q. I think you say in your statement that you don't recall

16 receiving any training around mental health; is that

17 right?

18 **A. Yeah. I don't remember -- I don't remember any training**

19 **on mental health.**

20 Q. Did you ever ask for any training on that?

21 **A. Not personally. I don't remember that, no.**

22 Q. For example, we have heard evidence about a number of

23 detainees who had PTSD. Did you have any training on

24 how to deal with people who had PTSD?

25 **A. Not as far as I'm aware, no.**

Page 22

1 **A. Well, we ended up actually having to monitor -- like, an**

2 **officer on the wing would end up actually having to**

3 **monitor the courtyard. I can't remember what used to**

4 **happen before that. I don't think there was anybody --**

5 **there was no officer that used to monitor the**

6 **courtyards. I believe activities would open up the**

7 **courtyards for detainees to access them for exercise or**

8 **sport or whatever and then they'd just be left to their**

9 **own devices throughout the day until lock-up. And there**

10 **would come a point where DCOs were then having to**

11 **monitor the courtyards. So, for example, if you only**

12 **had three staff on duty, you know, on the wing at the**

13 **time, then one of you would -- you know, you'd do it**

14 **in -- spend an hour and go and monitor the courtyard and**

15 **go and stand out there. So then you're short staffed.**

16 Q. In terms of going out to the courtyard, would it be done

17 a wing at a time?

18 **A. Excuse me?**

19 Q. Would it be done one wing at a time in terms of going

20 out to the courtyard?

21 **A. No, I mean, the courtyards would all be open to all the**

22 **wings, but it's just that there was a time where DCOs**

23 **then had to stand outside and monitor the courtyards.**

24 Q. Was there ever days where detainees weren't able to go

25 outside at all?

Page 24

6 (Pages 21 to 24)

1 **A. I think so, yeah, because there might not have been**
2 **enough staff for someone to actually go and stand there**
3 **and keep the courtyard open.**
4 Q. Did you see that as a big deal?
5 **A. Yeah, yeah, because you should be allowed to -- you**
6 **should be able to go and get fresh air, you should be**
7 **allowed to go and exercise. You --**
8 Q. Do you -- sorry.
9 **A. I'm just saying you should be allowed to go out and**
10 **spend time with your friends and people you have met in**
11 **there so, yeah, you should be able to go outside.**
12 Q. Do you think managers saw it as a big deal?
13 **A. I'd like to think so. It was quite an important**
14 **situation. People need to get out and get some fresh**
15 **air, but I'm not a senior manager so I wouldn't be**
16 **involved in any of those conversations.**
17 Q. When you were a DCM for those four months or five months
18 or so, you say that you found yourself on occasion
19 covering all five wings as DCM; is that right?
20 **A. It should be four, because I included with that B wing,**
21 **but it was -- B wing, I was normally working as a DCO,**
22 **but I have covered four wings. It wasn't every sort of**
23 **shift but there were occasions when that was the case.**
24 Q. Was that something you could actually physically do?
25 **A. It took a lot of effort, but you -- you were just going**

Page 25

1 **from one end of the centre to the other and dealing with**
2 **issues constantly through the day, but I managed to keep**
3 **up and managed to get down there and check the wing**
4 **diaries and so on, if need be, and check the workers had**
5 **been paid, for example.**
6 Q. I want to come on to ask you a few questions about some
7 comments you're recorded as making. First of all, on
8 5 June. If we could have up on screen, Zaynab,
9 <TRN0000080> at page 2, please. Mr Tomsett, this is
10 a transcript of a recording of a conversation between
11 you and some others, mostly between you and a detained
12 person. Obviously, Callum Tulley was there as well.
13 **A. Yes.**
14 Q. I'm not going to read the whole thing, but just to take
15 some of your comments. It says at the top -- this is
16 you saying:
17 "... don't talk ... about me because you are
18 worried."
19 The detainee says:
20 "You know, you have to be sick, and --"
21 You say:
22 "I know, mate, the day I am fucking worried about
23 you, so I might as well pack it in [inaudible] do one."
24 A few lines down, you say:
25 "Well, fucking do it on your own then."

Page 26

1 This is line 17:
2 "I don't want to do it, stop whining."
3 A couple of lines down you say:
4 "... you're whining like a fucking girl."
5 Then a couple of lines down you say:
6 "It's dumb, innit? Moaning. Man up."
7 A couple of lines down you say:
8 "That is because I don't listen to your fucking
9 bollocks."
10 And the detainee says to you that you're a "prick"
11 and says that you're "racist" and "EDL" and a "fucking
12 dickhead". Now, you were asked about this and you
13 explained it in your statement, Mr Tomsett, as being
14 a conversation that arose because the detained person
15 had demanded new boxers, even though he'd been given
16 clothing; is that right?
17 **A. Yeah.**
18 Q. You say that he then became abusive. Looking back at
19 that, do you think that justified your comments towards
20 him?
21 **A. No, I totally regret those comments that I made on that**
22 **day, totally regret them. Sometimes you just get so**
23 **frustrated and so stressed out, you know, even first --**
24 **like, as soon as you walk into the building, and maybe**
25 **I'd had a bad shift before that and I'd come in, or**

Page 27

1 **maybe I'd had a bad night, but I totally regret saying**
2 **that and I wish I hadn't said those comments.**
3 Q. How often do you think you made comments like this to
4 detained people?
5 **A. I don't think I made them all that often. I think it**
6 **just -- when you just got so stressed and you just got**
7 **so sort of anxious and being under pressure, I think --**
8 **you know, with your frustrations, I think it just ends**
9 **up sort of spilling out of you.**
10 Q. You say in your statement that it was important to stand
11 your ground with detained people who were being abusive
12 and threatening. Do you accept that this is going
13 beyond standing your ground?
14 **A. I think I probably went over the line there. It's**
15 **a bit -- it's quite difficult sometimes. You're just**
16 **trying to maintain that line or that boundary. I think**
17 **maybe, on the odd occasion, I might have overstepped**
18 **that line. As I say, I apologise for my comments that**
19 **I made on that occasion, yes.**
20 Q. The background you have given to this is this was
21 someone asking for boxer shorts who had already been
22 given clothing?
23 **A. Yes.**
24 Q. Do you see, or did you see, that it might be quite
25 humiliating for a detained person to have to be at the

Page 28

7 (Pages 25 to 28)

1 mercy of officers to get underwear?

2 **A. I think so, yeah. I think it could be.**

3 Q. Do you think you had that awareness at the time, of that

4 sort of power dynamic, that there were these people who

5 had to ask you for underwear?

6 **A. Sorry, say ...?**

7 Q. Did you see at the time there was this power dynamic,

8 I'll call it, in which detained people had to ask

9 officers for underwear?

10 **A. They didn't necessarily have to ask for underwear. They**

11 **would normally have to put in a request form for**

12 **destitute clothing, so it wasn't normally the right**

13 **thing to come in and sort of ask, or request, or**

14 **whatever, actual clothing, because there was**

15 **a particular process to follow.**

16 Q. But I suppose, sort of taking a step back, there's

17 a group of officers who -- you're choosing to be there,

18 you're coming in every day, you're getting paid, and

19 there's this group of detained people that don't choose

20 to be there and that have to make a written request or

21 a verbal request to get underwear. There's quite

22 a difference, isn't there?

23 **A. Yes.**

24 Q. Do you think you were conscious of that at the time?

25 **A. I don't think I was, no.**

Page 29

1 Q. You would accept, I think, based on what you have just

2 said, that even if he was being abusive towards you, it

3 doesn't justify you saying that he was "whining like

4 a fucking girl"?

5 **A. No.**

6 Q. One of the things we have heard from a few other

7 witnesses, Mr Tomsett, is about what people have

8 described as a masculine culture, a macho culture, and

9 staff describe being told by fellow officers to sort of

10 "man up". Did you see there being a macho culture at

11 Brook House?

12 **A. Not particularly, from my point of view.**

13 Q. Because you're calling him a "fucking girl" and then

14 telling him to "man up" here. Do you think that might

15 have contributed to a macho culture?

16 **A. It's possible, yeah.**

17 Q. If we can turn to page 4 of this document, please,

18 Zaynab. This is a brief record of a chat between you

19 and Callum Tulley soon after this and talking about the

20 same thing. Callum Tulley asks you whether you made

21 a new friend. You say:

22 "... I thought you lot were doing quite well on

23 [your] own."

24 Then you say:

25 "He is fucking doing my head in. Cunt."

Page 30

1 Then you say:

2 "Fucking, he can't even speak -- fucking spell."

3 Do you think describing a detained person as

4 a "cunt" was appropriate?

5 **A. Absolutely not. I regret saying that. I'm sorry about**

6 **that.**

7 Q. Was that sort of language between the staff pretty

8 normal? We have heard some staff say words like "cunt"

9 were --

10 **A. That's quite a dominant sort of word or saying in**

11 **Brook House. There was a lot of swearing that used to**

12 **go on in there. Sometimes that was how you communicated**

13 **because, in some cases, that was how, you know, you**

14 **would be able to speak to somebody. It wasn't something**

15 **that happened all the time with regards, like, the**

16 **swearing, but those sort of words were used quite a lot**

17 **and I think I ended up adopting -- it just happened so**

18 **often that I think I just ended up adopting some of**

19 **those words, which I regret doing.**

20 Q. When you're describing detained people as a "cunt", do

21 you think that that can lead to you dehumanising them as

22 well? Do you think it affected the way that you

23 perceived them?

24 **A. Possibly.**

25 Q. The same day, Callum Tulley made a video diary. You've

Page 31

1 seen the transcript of it. This is whilst he was

2 recording the interview to camera at the end of each

3 day. I'm not going to go to the document. I just want

4 to put some of the quotes to you. The reference, for

5 the record, is <TRN0000063> and Callum Tulley described

6 you, and you have seen this, as having a short fuse, as

7 having lost your temper, and also as being extremely

8 efficient and working hard, but that, when the stress of

9 the job got to you, you took it out on detainees. Do

10 you think this is an example of that?

11 **A. I don't think -- I don't think he's -- I don't think**

12 **it's completely right with what he says. I think**

13 **sometimes you just become so stressed and frustrated**

14 **that you maybe end up just losing your patience with it**

15 **all; you know? And you're sort of dealing with the**

16 **verbal abuse and some of the intimidation and the**

17 **threats every day, it just sort of gets on top of you**

18 **and you just have a -- begin to have a -- you know,**

19 **you've had enough of it.**

20 Q. This was an example of you losing your temper?

21 **A. Yeah.**

22 Q. Do you accept that?

23 **A. Yes.**

24 Q. One of the other things that he suggested was that you

25 would jump at the opportunity to get involved in

Page 32

8 (Pages 29 to 32)

<p>1 conflicts?</p> <p>2 A. No.</p> <p>3 Q. Do you accept that?</p> <p>4 A. No, I don't, no.</p> <p>5 Q. Zaynab, if we could have up on screen <TRN0000081>, 6 please, page 6. This is the next day, and -- let me 7 just check I have the right page. I've obviously given 8 myself the wrong reference, but there is a passage, I'm 9 sure it was somewhere, and it was put to you, where 10 you're talking to Callum Tulley and you're saying -- 11 describing that interaction, and you say: 12 "You're moaning that you're being detained. Well, 13 fucking stop getting detained." 14 Do you remember that?</p> <p>15 A. I don't remember the conversation, as such.</p> <p>16 Q. You remember being asked about it, though; yeah?</p> <p>17 A. Yeah.</p> <p>18 Q. You say in your statement, at paragraph 149, that what 19 you meant by that is that the detainee should sort 20 himself out and get his immigration case sorted; is that 21 right?</p> <p>22 A. Yes.</p> <p>23 Q. How could he get his immigration case sorted?</p> <p>24 A. By -- if he needs -- putting a request in to speak to 25 the Home Office or get himself some legal advice from</p> <p style="text-align: center;">Page 33</p>	<p>1 possibly. That's a separate one. I'll ask you about 2 the comment anyway and we can find the reference later, 3 if necessary. There is a transcript that refers to you 4 talking about a detained person on drugs, and you say, 5 "Mate, fucking look at you. Fuck me, drugs, wanker, 6 drugs, fucking idiot, drugs, drugs, drugs", and you have 7 said at paragraph 152 of your witness statement that you 8 don't consider it was inappropriate to talk about 9 detainees and drugs in this way; is that right? Oh, 10 yes, I've got it there.</p> <p>11 A. I believe those comments when I was saying, "What's the 12 matter with you?", were actually out of concern, because 13 I was probably surprised to see someone that had -- they 14 were using the drugs of some description. So that's 15 probably just out of concern and I would have probably 16 advised and said to him, "You need to go and get 17 something to eat or something to drink".</p> <p>18 Q. It is up on screen. This is a conversation between you 19 and Callum Tulley and you were describing someone on 20 drugs. For example, at line 216, you say: 21 "Fuck me. Drugs. Wanker, drugs." 22 At 218: 23 "Yeah. Fucking idiot. Drugs, drugs, drugs." 24 I know you said in your statement, Mr Tomsett, that 25 you were concerned about people being on drugs and</p> <p style="text-align: center;">Page 35</p>
<p>1 the solicitor and seeing if there was any way that maybe 2 he could prompt -- you know, get a response about his 3 case and being in Brook House.</p> <p>4 Q. You were there for three years, and your experience 5 was -- did you think that detained people were 6 themselves to blame for being detained?</p> <p>7 A. No, no.</p> <p>8 Q. In your experience, could they -- was the fact that they 9 were being detained due to a lack of effort on their 10 part to sort their case out?</p> <p>11 A. No, I don't think so.</p> <p>12 Q. Because we have heard a lot of evidence from detainees 13 who said that all they did, a lot of the time, was try 14 to speak to the Home Office, try to get their case 15 sorted out. Was that your experience?</p> <p>16 A. Yes.</p> <p>17 Q. So "fucking stop getting detained" is not really very 18 fair, is it?</p> <p>19 A. It's -- I regret saying that, yes.</p> <p>20 Q. Okay.</p> <p>21 A. I do.</p> <p>22 Q. If we can turn to page 8 in this document, please -- 23 hopefully I've got the right page. No, I've got the 24 wrong page again. Just give me one second, sorry. Just 25 checking this is <TRN0000081>. Yes, sorry. Try page 7,</p> <p style="text-align: center;">Page 34</p>	<p>1 that's where this comes from; is that right?</p> <p>2 A. Yeah, I think that was when I was looking at the board 3 that had all the names on, you see who was on B wing, 4 and I think I was pointing out where the drug -- people 5 using drugs or possibly even dealing them were in the 6 wing.</p> <p>7 Q. And did you see people who were using drugs at 8 Brook House as "fucking idiots"?</p> <p>9 A. Because I didn't think that they should be taking and 10 using the spice and the different drugs that were in the 11 centre.</p> <p>12 Q. Did you have any understanding about why people at 13 Brook House used spice?</p> <p>14 A. Probably as a crutch. Probably as, you know, an escape, 15 an escapism from sort of, maybe, the realities of having 16 to reside in Brook House.</p> <p>17 Q. Just on the issue of spice, was there any set protocol 18 or process for responding to spice attacks?</p> <p>19 A. Healthcare. Like, there'd be a first response or 20 a call, "Someone's having a bad attack on spice, get 21 healthcare to attend as quick as possible", and in some 22 cases they were taken to hospital, ambulance called.</p> <p>23 Q. So from your perspective, it was just, "Get healthcare", 24 basically?</p> <p>25 A. Get healthcare, put them in a recovery position, make</p> <p style="text-align: center;">Page 36</p>

<p>1 sure they were comfortable until healthcare arrived.</p> <p>2 Q. For you it would be to put them in a recovery position?</p> <p>3 A. Yeah, if it needed it, absolutely, yeah, just making</p> <p>4 sure they were comfortable.</p> <p>5 Q. Did you have any training about spice or drugs or</p> <p>6 anything like that?</p> <p>7 A. I don't particularly remember any sort of training.</p> <p>8 There may have been something that might have cropped up</p> <p>9 in the initial training, but I can't remember exactly.</p> <p>10 Q. Was spice a big issue for you as an officer?</p> <p>11 A. Well, yeah, because the drugs, be it -- whether it was</p> <p>12 spice or any other drug -- used to cause issues with,</p> <p>13 you know, detainees in the centre, so it was quite</p> <p>14 important to try and deal with.</p> <p>15 Q. If we can have up on screen, please, <TRN0000083> at</p> <p>16 page 2, please. This is a conversation -- a record of</p> <p>17 a conversation between you and Dan Small and</p> <p>18 Callum Tulley, talking about a detained person.</p> <p>19 Although it is redacted, at the top there is</p> <p>20 a discussion about this detained person's criminal</p> <p>21 record, and you describe him as a "horrible bastard".</p> <p>22 You say that he put his chin out -- this is at lines 20</p> <p>23 to 21. You say:</p> <p>24 "Put his chin out", and he wanted you to "fucking</p> <p>25 dig him". That's 23. You say at line 25:</p> <p style="text-align: center;">Page 37</p>	<p>1 that people are threatening to assault you or</p> <p>2 threatening you.</p> <p>3 Q. Sure --</p> <p>4 A. Again, at that time, I've most likely lost my patience</p> <p>5 and said it out of frustration and stress.</p> <p>6 Q. This is just a conversation between you and</p> <p>7 Callum Tulley and Dan Small, though?</p> <p>8 A. Yes.</p> <p>9 Q. I appreciate you're saying that, you know, if you were</p> <p>10 defending yourself or standing your ground --</p> <p>11 A. Yeah.</p> <p>12 Q. -- but it's quite far beyond saying, you know, that</p> <p>13 you'd punch somebody back or you'd even push them or use</p> <p>14 force on them. "I'll fucking put you out of your</p> <p>15 misery" is pretty extreme, isn't it?</p> <p>16 A. Yes.</p> <p>17 Q. It goes beyond standing your ground. Do you accept</p> <p>18 that? Or it would have if it had happened?</p> <p>19 A. Yes.</p> <p>20 Q. Some other comments on the same day. At pages 15 to 16</p> <p>21 of this, please -- actually, before we do that, if we</p> <p>22 can just -- oh, no, we're fine here. This is part of</p> <p>23 a conversation between you and Callum Tulley about</p> <p>24 detained people, and you are saying at the top that it's</p> <p>25 "just a game to them", and then you say:</p> <p style="text-align: center;">Page 39</p>
<p>1 "Yeah. I went, 'No, mate. I said, 'You' -- I said,</p> <p>2 'Throw the first one. I said, 'You throw the first one,</p> <p>3 and I'll fucking put you out of your misery. If you</p> <p>4 throw the first one, I'll fucking put you out of this</p> <p>5 office. So it's up to you, mate'. Stinking attitude."</p> <p>6 Did you actually say that to the detained person?</p> <p>7 A. That's what it says in the transcript. I regret --</p> <p>8 I regret those words. I've seen it in the transcript</p> <p>9 and that, so if I said that to the detainee, I apologise</p> <p>10 and I regret that.</p> <p>11 Q. Do you accept that that's threatening someone, saying</p> <p>12 "I'll fucking put you out of your misery"?</p> <p>13 A. I think there was probably a bit more of a back story to</p> <p>14 it, in terms of stuff that had been going on before that</p> <p>15 and -- with the detainee, I'm not sure how long he'd</p> <p>16 been on the wing, or whatever, but there was probably</p> <p>17 a back story to it.</p> <p>18 Q. Regardless of that, Mr Tomsett, you say in your</p> <p>19 statement that you had never threatened a detainee. You</p> <p>20 say that at paragraph 161. But this is threatening,</p> <p>21 isn't it?</p> <p>22 A. If I was going to get -- if I was going to be assaulted.</p> <p>23 Q. That you would "fucking put them out of their misery"?</p> <p>24 A. I was just standing up for myself, because that's the</p> <p>25 sort of thing that, sometimes, you just come across,</p> <p style="text-align: center;">Page 38</p>	<p>1 "They come to -- they come -- they come to whatever</p> <p>2 country -- they go to whatever country. It doesn't</p> <p>3 matter where. They go to whatever country. They don't</p> <p>4 want to come here legally; they want to do it illegally</p> <p>5 under a lorry, back of a bus, whatever. And they arrive</p> <p>6 here, they get away with doing work, getting paid cash,</p> <p>7 paying no taxes, mate. You know, all of this sort of</p> <p>8 stuff."</p> <p>9 Then you say:</p> <p>10 "It's just a game. They get caught, they come in</p> <p>11 here. They get sent back, they come back again. Why?</p> <p>12 Because everything's here. They don't have this sort of</p> <p>13 shit going on over there in Albania or Poland ..."</p> <p>14 You say:</p> <p>15 "They don't have this great, amazing benefits</p> <p>16 system."</p> <p>17 You say:</p> <p>18 "So they come over here. It's incredible."</p> <p>19 Then you talk about something about someone getting</p> <p>20 a maisonette. If we can turn over to the next page,</p> <p>21 please, you say:</p> <p>22 "... I'm not really that bothered. You know, if</p> <p>23 people come -- want to come and live here, so be it.</p> <p>24 I really don't give a shit."</p> <p>25 Actually, back over to the previous page, sorry, at</p> <p style="text-align: center;">Page 40</p>

<p>1 the bottom, line 613, you say:</p> <p>2 "When they come over here, and they want this and</p> <p>3 they want that. It's like, hold on, how about we</p> <p>4 fucking look after and sort out, you know, your own kids</p> <p>5 first. Sort out our own fucking boys and girls."</p> <p>6 You were asked about this in your statement,</p> <p>7 Mr Tomsett, and you say that this view that you were</p> <p>8 expressing here didn't affect you in your role at</p> <p>9 Brook House; is that right?</p> <p>10 A. Yes.</p> <p>11 Q. Did you see the people who were detained at Brook House</p> <p>12 as having come to the UK for the benefits system?</p> <p>13 A. Some of the detainees actually told us that's what</p> <p>14 happened. That's what they did. Some detainees had</p> <p>15 said to me that they'd come to the country, they work</p> <p>16 and then send the money back home and they said that</p> <p>17 that's what they did and that's what happened.</p> <p>18 Q. That's working and sending the money home is different</p> <p>19 from coming over here and using the benefits system,</p> <p>20 isn't it?</p> <p>21 A. Yes.</p> <p>22 Q. Did you see that as being what most of the detainees at</p> <p>23 Brook House were doing?</p> <p>24 A. I don't know, because I don't know what their situation</p> <p>25 was, whether they were working or not. It was just sort</p> <p style="text-align: center;">Page 41</p>	<p>1 Q. When you say "Sort out our own fucking boys and girls</p> <p>2 first", does that not suggest it does matter to you</p> <p>3 where people come from?</p> <p>4 A. No.</p> <p>5 Q. Before we move on to some of the allegations that were</p> <p>6 made against you at the time, you may be aware that</p> <p>7 there's a -- someone who is a witness to the inquiry who</p> <p>8 has provided a draft witness statement. I'm just going</p> <p>9 to read what he says about you and ask you to comment on</p> <p>10 it. It's someone who we know as D180. He says:</p> <p>11 "Darren Tomsett was extremely nasty to detainees.</p> <p>12 He was very confrontational and appeared to really enjoy</p> <p>13 using force and restraining detainees. He was racist</p> <p>14 towards the detainees. For example, he would tell</p> <p>15 people who were applying to stay in the UK that they</p> <p>16 should just leave and go back to their country. He did</p> <p>17 not care about our well-being whatsoever and detainees</p> <p>18 disliked him. Darren is one of the wing officers who</p> <p>19 would let people out in the morning and lock people up</p> <p>20 at night."</p> <p>21 He then goes on to describe you working at the wing</p> <p>22 office and he says:</p> <p>23 "I began buying toiletries with money which friends</p> <p>24 and family had sent me and I made working just so that</p> <p>25 I didn't have to go to the office to ask Darren for</p> <p style="text-align: center;">Page 43</p>
<p>1 of generalised comments, what they would -- they'd be in</p> <p>2 the United Kingdom and they were, for whatever reason,</p> <p>3 sending money back, whether that was for, like, work or</p> <p>4 whatever.</p> <p>5 Q. Were you aware that many of the detainees at Brook House</p> <p>6 were seeking asylum?</p> <p>7 A. I didn't know what their -- some of their situations</p> <p>8 were.</p> <p>9 Q. But you knew, for example, lots of them were from</p> <p>10 countries like Afghanistan?</p> <p>11 A. Yeah, yeah.</p> <p>12 Q. Or other countries where they said that they'd fled</p> <p>13 from. You were aware of that?</p> <p>14 A. Yes.</p> <p>15 Q. Did you see that cohort of detainees differently from</p> <p>16 those who you saw as coming to use the benefits system?</p> <p>17 A. I don't know. I don't know.</p> <p>18 Q. You didn't treat them differently?</p> <p>19 A. No.</p> <p>20 Q. One of the things you say overall in your statement is</p> <p>21 that, although you've been accused of being racist --</p> <p>22 and we will come on to some of those accusations in</p> <p>23 a bit -- it doesn't matter to you where came people</p> <p>24 from; is that right?</p> <p>25 A. It doesn't, no.</p> <p style="text-align: center;">Page 42</p>	<p>1 anything. Life was less distressing if I avoided him."</p> <p>2 What do you say about those allegations?</p> <p>3 A. I think that's inaccurate and I don't think that's true</p> <p>4 and I wouldn't have told him to go back to his own</p> <p>5 country.</p> <p>6 Q. You never said that to a detainee?</p> <p>7 A. No. No, I think that's misconstrued.</p> <p>8 Q. What do you mean?</p> <p>9 A. Just sometimes when you're having a conversation with</p> <p>10 a detainee, you're kind of like saying -- you know,</p> <p>11 you'd be talking about something and you could say,</p> <p>12 "Well, you know, if things weren't going so well for you</p> <p>13 in the United Kingdom with regards to your case",</p> <p>14 sometimes you might say, "have you considered that you</p> <p>15 can return to your home country, your home country".</p> <p>16 And I think sometimes, when you're having conversations,</p> <p>17 I think -- and myself included, in different cultures</p> <p>18 you can sometimes maybe misconstrue what certain -- some</p> <p>19 things that are said. I wouldn't have said that, he</p> <p>20 should go back to his own country, no.</p> <p>21 Q. So you wouldn't have said that in anger?</p> <p>22 A. No.</p> <p>23 Q. "Go back to your own fucking country"?</p> <p>24 A. No.</p> <p>25 Q. Or anything like that?</p> <p style="text-align: center;">Page 44</p>

<p>1 A. No.</p> <p>2 Q. I want to come on to ask you, Mr Tomsett, about some of</p> <p>3 the complaints that were made against you during your</p> <p>4 employment. I'm not going to ask you about all of them.</p> <p>5 I think there were 13 complaints in total. You have</p> <p>6 addressed each of them in your witness statement?</p> <p>7 A. Mmm-hmm.</p> <p>8 Q. Before we get into the detail of some of them, do you</p> <p>9 have any view now, you know, with all of this having</p> <p>10 been put to you, why you were the subject of so many</p> <p>11 complaints?</p> <p>12 A. I think probably mainly because I would stand up and</p> <p>13 I would follow -- try and adhere to the centre rules,</p> <p>14 and I think that maybe detainees didn't like, sometimes,</p> <p>15 what I might say, in terms that maybe they weren't</p> <p>16 allowed to have something or they weren't allowed to do</p> <p>17 something, and I think that's where it all sort of comes</p> <p>18 from.</p> <p>19 Q. Do you think that, on reflection, given some of</p> <p>20 the recordings we have been talking about, your own</p> <p>21 behaviour was at all to blame for the number of</p> <p>22 complaints you got?</p> <p>23 A. I don't think so, not for those complaints, no. That</p> <p>24 was all found to be unsubstantiated bar one.</p> <p>25 Q. At any stage during the three years of your employment,</p> <p style="text-align: right;">Page 45</p>	<p>1 Q. Do you think that the volume of complaints suggests that</p> <p>2 that wasn't successful?</p> <p>3 A. No.</p> <p>4 Q. You don't think that?</p> <p>5 A. I think I built some very good relationships with a lot</p> <p>6 of detainees in the centre, especially where I was</p> <p>7 working on A and B wing.</p> <p>8 Q. But do you think there was also a group of detainees</p> <p>9 whom you weren't successful in building that</p> <p>10 relationship with?</p> <p>11 A. I think with the detainees, even the detainees that had</p> <p>12 put complaints in against me, I still had built a decent</p> <p>13 kind of working relationship with them, and I think</p> <p>14 perhaps there was just occasions where things might have</p> <p>15 just gotten to a point where they didn't like something</p> <p>16 and, at that particular point, they'd put a complaint in</p> <p>17 against me, for whichever reasons.</p> <p>18 Q. I'm going to ask you briefly about some of</p> <p>19 the complaints before 2017, before the relevant period,</p> <p>20 because although we are not concerned with the detail of</p> <p>21 those, we are concerned with the broad issues as</p> <p>22 context. So you deal with these from paragraph 168 of</p> <p>23 your witness statement, and, first of all, there is an</p> <p>24 allegation or a complaint from someone we know as D1985,</p> <p>25 in October 2015, that you were abusing and threatening</p> <p style="text-align: right;">Page 47</p>
<p>1 did anyone from the Home Office or G4S ever discuss with</p> <p>2 you the fact of the complaints in their totality? So</p> <p>3 rather than asking you about any specific complaint,</p> <p>4 saying, you know, "Mr Tomsett, taking a step back here,</p> <p>5 we have looked at this and you have been subject to</p> <p>6 13 complaints over the last two years", did you ever</p> <p>7 have any conversation like that?</p> <p>8 A. No.</p> <p>9 Q. Were you conscious at the time that you just kept on</p> <p>10 being subject to complaints?</p> <p>11 A. No, not really. Because I -- I think, when I would look</p> <p>12 at it, if there was 13 -- was it 13 complaints? -- over,</p> <p>13 like, a three-year period, I wasn't particularly</p> <p>14 concerned, but then I didn't know -- I didn't know how</p> <p>15 many complaints -- I wasn't keeping count of them and</p> <p>16 I didn't know that a complaint had been sort of put in</p> <p>17 against me until a manager or the -- DCM Edwards --</p> <p>18 Q. Conway Edwards?</p> <p>19 A. Conway Edwards would come and advise me of it and say</p> <p>20 that he wanted to speak with me and investigate the</p> <p>21 complaint.</p> <p>22 Q. One things you say at the beginning of your witness</p> <p>23 statement is that you would try, in your employment, to</p> <p>24 build a working relationship with detained people?</p> <p>25 A. Yes.</p> <p style="text-align: right;">Page 46</p>	<p>1 him and that you treat detainees like the worst scum on</p> <p>2 earth. What do you say about that?</p> <p>3 A. Well, I think that's false. I don't know anything about</p> <p>4 that, actually. I've done a statement and everything,</p> <p>5 but I've got nothing to say about it. It was found to</p> <p>6 be unsubstantiated.</p> <p>7 Q. Do you have any idea why someone would say that you were</p> <p>8 abusing and threatening them?</p> <p>9 A. No.</p> <p>10 Q. In this complaint, some of the other -- there was also</p> <p>11 some other residents that signed a petition and it was</p> <p>12 noted in the outcome that some of those who signed the</p> <p>13 petition said they didn't have a problem with you; is</p> <p>14 that right?</p> <p>15 A. Yes.</p> <p>16 Q. It was also noted that D1985 himself admitted using</p> <p>17 abusive language?</p> <p>18 A. Yes.</p> <p>19 Q. Given what we have seen in a couple of the recordings,</p> <p>20 do you think it's possible that you did respond in the</p> <p>21 same type of way as you did in that recording, by</p> <p>22 saying, you know, calling him a "cunt" or saying</p> <p>23 anything like that?</p> <p>24 A. I haven't done that in -- with this alleged -- with this</p> <p>25 complaint.</p> <p style="text-align: right;">Page 48</p>

<p>1 Q. Okay.</p> <p>2 A. So I haven't really got anything much more to say to it,</p> <p>3 apart from, it was investigated and it was found to be</p> <p>4 unsubstantiated, I hadn't done anything.</p> <p>5 Q. The next one, at paragraph 169, you deal with an</p> <p>6 allegation from D4277 in February 2016. He alleges that</p> <p>7 you were racist and said to him to go back to his</p> <p>8 country. Do you accept that?</p> <p>9 A. No, that's false. I never said that.</p> <p>10 Q. That's, of course, the same allegation that's made by</p> <p>11 D180 to this inquiry. Any idea why two detainees would</p> <p>12 allege that you made --</p> <p>13 A. No idea.</p> <p>14 Q. -- exactly the same comment?</p> <p>15 A. No.</p> <p>16 Q. You're sure that you never said it to someone in anger?</p> <p>17 A. Said what in anger?</p> <p>18 Q. Said "Go back to your fucking country", or anything like</p> <p>19 that?</p> <p>20 A. No, definitely not.</p> <p>21 Q. Paragraph 171 of your statement. There's an allegation</p> <p>22 from D4049 in September 2016 that you asked him</p> <p>23 questions in an argumentative tone, you made a racist</p> <p>24 comment and swore at him. I think you accept in your</p> <p>25 statement, Mr Tomsett, that you asked D4049 what he was</p> <p style="text-align: center;">Page 49</p>	<p>1 your conduct appeared as if you wanted to fight the</p> <p>2 detainees and were never in the wrong, that you behaved</p> <p>3 aggressively and were cocky, particularly when D381</p> <p>4 asked for a curtain, and it also notes at page 5 that</p> <p>5 the complaint was signed by some others as well.</p> <p>6 I think it's at the bottom of page 5. What do you say,</p> <p>7 Mr Tomsett, in response to those allegations, that you</p> <p>8 discriminated against black or Caribbean detainees,</p> <p>9 firstly?</p> <p>10 A. That's false.</p> <p>11 Q. False. Do you accept that you behaved aggressively</p> <p>12 towards detained people?</p> <p>13 A. No, that's false.</p> <p>14 Q. And do you accept that your conduct might have appeared</p> <p>15 as if you wanted to fight detainees?</p> <p>16 A. I didn't want to fight detainees. That's false.</p> <p>17 Q. We have already seen a recording of you saying, "Throw</p> <p>18 the first one and I'll fucking put you out of your</p> <p>19 misery". You think you might have said that sort of</p> <p>20 comment to someone?</p> <p>21 A. No.</p> <p>22 Q. In your statement, Mr Tomsett, you deal with this at</p> <p>23 paragraph 175. You say that you don't recall the</p> <p>24 incident with D381, but you told Conway Edwards, when he</p> <p>25 investigated, that you'd been asked for a curtain and</p> <p style="text-align: center;">Page 51</p>
<p>1 looking at; is that right?</p> <p>2 A. I believe he just kept staring at me and just kept</p> <p>3 looking at me from where the fax machine was into the</p> <p>4 office and I wondered what the issue was.</p> <p>5 Q. You note that a staff member from chaplaincy said that</p> <p>6 she'd observed a heated conversation. Do you accept</p> <p>7 that there was a heated conversation?</p> <p>8 A. I don't remember it, but I'll accept that that's what --</p> <p>9 if that's right.</p> <p>10 Q. What about swearing at him? Do you think you might have</p> <p>11 sworn at him?</p> <p>12 A. I don't know.</p> <p>13 Q. One of the allegations was that you said, "You lot think</p> <p>14 you're big men". Do you think that's something you</p> <p>15 might have said?</p> <p>16 A. I don't recollect what that means, or I don't recollect</p> <p>17 even saying that.</p> <p>18 Q. I now want to come on to some of the complaints that</p> <p>19 were made about you during the relevant period.</p> <p>20 Firstly, in relation to a complaint made by D381. If we</p> <p>21 can have up on screen <CJS001443>, please. I'm not</p> <p>22 going to go through each page of this, but, in summary,</p> <p>23 this complaint was that you discriminated against black</p> <p>24 or Caribbean detained people, that you got very</p> <p>25 aggressive and behaved like you owned Brook House, that</p> <p style="text-align: center;">Page 50</p>	<p>1 that you had said there were no curtains on D wing; is</p> <p>2 that right?</p> <p>3 A. I believe the detainee was diversity orderly, so he'd</p> <p>4 been coming over to Bravo wing. If he needed any form</p> <p>5 of curtain of any description, he'd be able to speak to</p> <p>6 his own wing officer on his own wing for that sort of</p> <p>7 thing.</p> <p>8 Q. Why were people coming onto your wing and asking for</p> <p>9 curtains if they could get them from their own?</p> <p>10 A. I don't know. Maybe just because they actually needed</p> <p>11 a curtain but they weren't being provided with one on</p> <p>12 their own wing, or maybe it was just a ploy to try to</p> <p>13 get onto the wing for some other reason.</p> <p>14 Q. If we can turn to page 10 of this document, please, this</p> <p>15 is part of the outcome letter from Conway Edwards, who</p> <p>16 investigated this. He concludes that the allegation was</p> <p>17 unsubstantiated and he notes that you had told the</p> <p>18 detainee that there were no curtains, you'd explained</p> <p>19 that you treat everyone with respect and dignity, you</p> <p>20 felt that you were pretty good at defusing situations</p> <p>21 and that you didn't have any issues with nationality or</p> <p>22 race; is that right?</p> <p>23 A. Yes.</p> <p>24 Q. Do you think, looking back, that you were good at</p> <p>25 defusing situations?</p> <p style="text-align: center;">Page 52</p>

<p>1 A. I think so, yeah, yeah.</p> <p>2 Q. Do you think you treated everyone with respect and</p> <p>3 dignity?</p> <p>4 A. As best as I could, yes, actually.</p> <p>5 Q. But not everyone, right, because you have accepted that</p> <p>6 there were a couple of times when you lost your temper?</p> <p>7 A. Yes, I accept that.</p> <p>8 Q. If we can turn to a different document, <TRN0000080>,</p> <p>9 please, at page 16, please. So this is a record of</p> <p>10 a conversation on 5 June, bearing in mind the complaint</p> <p>11 that was made that we are talking about was made the</p> <p>12 next day, on 6 June. This is a situation that you</p> <p>13 weren't a part of, but it is partly about you. It says</p> <p>14 at -- I'm just going to summarise some of what it says.</p> <p>15 It is a conversation between Dan Lake, Dan Small and</p> <p>16 Callum Tulley. There is a discussion about you having</p> <p>17 responded to someone pulling a curtain, Dan Lake says:</p> <p>18 "Geezer coming from C wing, he's pulling a curtain</p> <p>19 ... and Darren just had a go at him like you wouldn't</p> <p>20 believe."</p> <p>21 Dan Small says:</p> <p>22 "You could either tell him, 'okay, I will get you</p> <p>23 a curtain from the spare room that we have' or 'no, we</p> <p>24 don't have any, I'm afraid'. But Darren -- he's losing</p> <p>25 the plot man."</p> <p style="text-align: center;">Page 53</p>	<p>1 A. Yeah.</p> <p>2 Q. And you responding to it and then him complaining about</p> <p>3 your response to it. This suggests Dan Lake is</p> <p>4 suggesting here that, in response to being asked for</p> <p>5 a curtain, you went fucking nuts and said, "You ain't</p> <p>6 fucking having one". Is it possible that that's what</p> <p>7 you said in response?</p> <p>8 A. I don't think so, no.</p> <p>9 Q. Do you remember if other people were around when D381</p> <p>10 asked you for the curtain?</p> <p>11 A. I don't. I don't remember.</p> <p>12 Q. Do you accept that if Dan Lake is giving an accurate</p> <p>13 account here, where he says that you went nuts and said,</p> <p>14 "You ain't fucking having one", do you accept that that</p> <p>15 would have been an inappropriate way to respond to</p> <p>16 a request for a curtain?</p> <p>17 A. If that was the case, yes.</p> <p>18 Q. Just on this issue, in terms of asking for a curtain,</p> <p>19 what were curtains used for?</p> <p>20 A. They were the toilet curtains or the curtains that would</p> <p>21 go up on the windows.</p> <p>22 Q. Did you see, at the time, that having to ask for</p> <p>23 a curtain to hide yourself going to the toilet might be</p> <p>24 quite a demeaning thing to have to ask for?</p> <p>25 A. I don't think they looked at it -- I don't think anyone</p> <p style="text-align: center;">Page 55</p>
<p>1 And Callum Tulley says:</p> <p>2 "Who is this D381?"</p> <p>3 So it appears it's talking about the same gentleman</p> <p>4 who made the complaint against you. Dan Lake says about</p> <p>5 you:</p> <p>6 "He went nuts. He went 'you ain't fucking having</p> <p>7 one, they are for this week'."</p> <p>8 Dan Lake then describes it as "so extreme".</p> <p>9 Dan Small then describes an occasion where a detainee</p> <p>10 was looking at you and you responded saying, "Do you</p> <p>11 want to kiss me or something?" Dan Lake then describes</p> <p>12 you as a "fucking nutter" and says that you "completely</p> <p>13 lost the plot". He describes you as a "raving nutter".</p> <p>14 Then, at the bottom of the page, Dan Small says:</p> <p>15 "What he does is he will argue with them and then</p> <p>16 bin them off."</p> <p>17 And Dan Lake says:</p> <p>18 "Yeah, definitely, he winds them up and then sends</p> <p>19 them out."</p> <p>20 What do you say in relation to these comments?</p> <p>21 A. I don't know what -- I mean, I don't know what to say.</p> <p>22 That's their sort of -- their opinions, by the looks of</p> <p>23 it, but I don't recollect saying any of that.</p> <p>24 Q. The complaint that we're dealing with is D381 asking for</p> <p>25 a curtain.</p> <p style="text-align: center;">Page 54</p>	<p>1 looked at it as demeaning. It was just the fact they</p> <p>2 needed a curtain. But a lot of the times the curtains</p> <p>3 would get removed and go elsewhere and then you wouldn't</p> <p>4 even be able to find curtains within the centre, so</p> <p>5 therefore you'd have to -- what could you do? If you've</p> <p>6 got no curtains, you know, there's nothing you can do</p> <p>7 about it. I can imagine it would be quite a frustrating</p> <p>8 thing when you want to use the lavatory.</p> <p>9 Q. If someone didn't have a curtain, if, as you say, it had</p> <p>10 been taken and there weren't any, it would mean,</p> <p>11 presumably, they had to go to the toilet in front of</p> <p>12 someone else?</p> <p>13 A. If they were in the same room at the time, yeah.</p> <p>14 Q. There weren't just public toilets or anything they could</p> <p>15 use, were there?</p> <p>16 A. No, there wasn't. The toilets were in each of</p> <p>17 the rooms.</p> <p>18 Q. Do you accept that having to go to the toilet in your</p> <p>19 room in front of somebody else without a curtain would</p> <p>20 be pretty demeaning?</p> <p>21 A. Yeah, it could be, yeah.</p> <p>22 Q. Did you have sympathy for people having to ask for</p> <p>23 curtains?</p> <p>24 A. Yeah, the curtains and everything should have been in</p> <p>25 there, which is what they were at the time when we first</p> <p style="text-align: center;">Page 56</p>

<p>1 opened up and we first started using B wing as the</p> <p>2 induction wing, everything was in there, everything was</p> <p>3 in place, but over slowly -- slowly, over time, bits and</p> <p>4 pieces would eventually disappear and the curtains would</p> <p>5 disappear, so then you'd chase around or try and see if</p> <p>6 you could order some more and replace them.</p> <p>7 Q. We have heard some evidence over the last couple of</p> <p>8 weeks, and also in November, from former detainees who</p> <p>9 talk about having to go to the toilet in front of their</p> <p>10 roommates as being one of the worst things that they had</p> <p>11 to experience at Brook House. Did you appreciate that</p> <p>12 at the time?</p> <p>13 A. Not -- until you sort of mention it or talk about it</p> <p>14 like that, no-one has ever sort of brought that up with</p> <p>15 me or spoken to me about it.</p> <p>16 Q. But looking back now, you can accept that that would be</p> <p>17 a pretty demeaning thing to have to do?</p> <p>18 A. Yeah, yeah, yeah.</p> <p>19 Q. I now want to ask you about a complaint made by someone</p> <p>20 who we know as D1538. The complaint, Mr Tomsett, that</p> <p>21 was made was that, in August -- sorry, the complaint was</p> <p>22 made in August 2017, and the complaint was that, on</p> <p>23 28 June 2017, an officer had told him that he needed to</p> <p>24 change his clothes, as he looked gay, and then he</p> <p>25 reacted angrily and was given a written warning for his</p> <p style="text-align: center;">Page 57</p>	<p>1 statement to the inquiry. If we can have it up on</p> <p>2 screen, it is <DL0000231>, at page 28, please. This is</p> <p>3 where he starts talking about the incident at the bottom</p> <p>4 of that page, on 28 June. He says:</p> <p>5 "A detention officer told me that I was not allowed</p> <p>6 to go to C wing and that I should change my clothes</p> <p>7 because I looked gay."</p> <p>8 He says:</p> <p>9 "I reacted angrily to what he said because I could</p> <p>10 not believe that a detention officer would speak to me</p> <p>11 like that."</p> <p>12 Then if we can go over the page, please. At</p> <p>13 paragraph 104 he said that you made this comment in</p> <p>14 front of lots of other detainees and they laughed at him</p> <p>15 and teased him and mocked him for days after the</p> <p>16 comment. What do you say to this allegation?</p> <p>17 A. No, again, I think that's false and untrue.</p> <p>18 Q. You say in your statement, when talking about this, that</p> <p>19 you would never say a detainee looked gay or that he</p> <p>20 should change his clothes because he looked gay?</p> <p>21 A. No.</p> <p>22 Q. And that you didn't push him or push his head down?</p> <p>23 A. No.</p> <p>24 Q. Do you have any idea why someone might make</p> <p>25 a quite specific allegation about quite a specific</p> <p style="text-align: center;">Page 59</p>
<p>1 behaviour, and this officer was later identified as</p> <p>2 being you. You say in response to this in your</p> <p>3 statement, Mr Tomsett, that you'd issued the warning to</p> <p>4 D1538 that day, and you set out the contents of that</p> <p>5 warning.</p> <p>6 A. Yes.</p> <p>7 Q. And the complaint was eventually investigated by the</p> <p>8 Professional Standards Unit, which I think -- who</p> <p>9 I think interviewed you as part of that?</p> <p>10 A. Yes.</p> <p>11 Q. I think they might have used the G4S statement for it,</p> <p>12 but either way you knew about the investigation, and,</p> <p>13 again, he repeated the allegation that you'd said to him</p> <p>14 that he looked gay and said -- he also said during that</p> <p>15 investigation that you pushed him out and pushed his</p> <p>16 head down?</p> <p>17 A. No.</p> <p>18 Q. And he said he was concerned that other detained people</p> <p>19 would think that he was gay. Did you say to him that he</p> <p>20 looked gay?</p> <p>21 A. No, absolutely not.</p> <p>22 Q. Do you think there is no way you would have said that</p> <p>23 statement?</p> <p>24 A. Absolutely not, no.</p> <p>25 Q. You should have also seen, Mr Tomsett, his witness</p> <p style="text-align: center;">Page 58</p>	<p>1 comment against you?</p> <p>2 A. Maybe he was making it up because I wouldn't let him</p> <p>3 access onto the wing.</p> <p>4 Q. If he was going to make it up, he might make up</p> <p>5 something stronger than he looked gay, mightn't he?</p> <p>6 A. I can't answer it, but I know I never said that to him.</p> <p>7 Q. You think it was entirely invented, this allegation?</p> <p>8 A. Possibly.</p> <p>9 Q. Did you ever say anything like that to any detainee</p> <p>10 about their sexuality --</p> <p>11 A. No.</p> <p>12 Q. -- or anything like that?</p> <p>13 A. No.</p> <p>14 Q. Coming on to some complaints that were made by someone</p> <p>15 who we know as D668, he made a series of complaints,</p> <p>16 and, just to summarise what the complaints were against</p> <p>17 you, for your reference, Mr Tomsett, you deal with this</p> <p>18 at paragraphs 183 to 186 of your statement?</p> <p>19 A. I've got it, thank you.</p> <p>20 Q. But just to summarise the allegations that were made</p> <p>21 against you, one is that, on 29 June, you went to his</p> <p>22 room and told him to take your stuff and get out, in</p> <p>23 a rude manner that shocked him, in relation to him being</p> <p>24 due to be removed. And he also alleges that, on</p> <p>25 24 August, when he went for a visit with his brother,</p> <p style="text-align: center;">Page 60</p>

1 you asked him rudely to, "Come here", frisked him
 2 roughly, told him to shut up and left him feeling
 3 intimidated and humiliated, and he also said that you
 4 were racist. What do you say in relation to these
 5 allegations, Mr Tomsett?
 6 **A. Again, it's false and it's not accurate.**
 7 Q. You were interviewed by the PSU I think in
 8 late January 2018, after you'd left your employment at
 9 Brook House.
 10 **A. Yes.**
 11 Q. And, in summary, your response was that, first of all,
 12 in relation to 29 June, you wouldn't have spoken to him
 13 in the way suggested, but you'd have asked him to go to
 14 reception after he packed his things, and you say that
 15 you conducted the search in the same manner you'd have
 16 done --
 17 **A. Same manner, yes.**
 18 Q. Firm, but not too soft?
 19 **A. Just the regular pat-down search. It has to be -- you**
 20 **have to -- it has to be done firm enough through --**
 21 **like, because they have got their clothes on. They**
 22 **might have, like, a jumper on or something like that.**
 23 **So you just have to be able to do it so it's not too**
 24 **soft but it's got to be enough to be able to feel down**
 25 **the arms and the legs and the torso.**

Page 61

1 you have any idea why there might be that number of
 2 allegations of racism against you?
 3 **A. No, I don't. No.**
 4 Q. When you were interviewed by the PSU, you said, and you
 5 quote this in your statement at paragraph 183, you say
 6 that the word "racist" was a loose term that was thrown
 7 around in Brook House; is that right?
 8 **A. Yeah.**
 9 Q. Did you experience people calling you "racist" to your
 10 face?
 11 **A. Yes.**
 12 Q. Did you ever reflect on whether these allegations might
 13 have anything to them?
 14 **A. Sometimes they would just say it to me because they**
 15 **didn't like what I would have said to them; ie, if**
 16 **I said to them they weren't allowed to come onto the**
 17 **wing, for example, because that was quite a common**
 18 **thing, eventually they'd get tired of, you know, sort of**
 19 **keep asking you and, eventually, at some point, at some**
 20 **times, you can accused of being racist because you**
 21 **wouldn't let them come onto the wing.**
 22 Q. And you don't consider yourself to be racist at all?
 23 **A. No.**
 24 Q. Did you ever reflect on whether you needed to change
 25 your behaviour at all in this regard?

Page 63

1 Q. One of the allegations is that you told him to shut up.
 2 You say that you'd never have told a detained person to
 3 shut up. But we have already seen evidence of you
 4 telling a detained person to "stop whining like
 5 a fucking girl". So are you saying that you would never
 6 tell a detainee to shut up?
 7 **A. He said that I told him to shut but I never told him to**
 8 **shut up.**
 9 Q. You've never told a detainee to shut up?
 10 **A. I may have done previously, but I didn't tell him to**
 11 **shut up, no.**
 12 Q. How can you be so sure of that?
 13 **A. Because it's not something I would have said to him.**
 14 **I just asked him to get his stuff and he needs to come**
 15 **down to reception.**
 16 Q. Are you sure you weren't just denying having said that
 17 to protect yourself?
 18 **A. No, I don't think so, no. I didn't say that.**
 19 Q. You will have been aware from the documents provided to
 20 you that D668, who we are talking about, gave evidence
 21 to this inquiry last year, and he said that you were --
 22 he made these allegations again and said that you were
 23 racist and behaved differently towards black people and
 24 white people. There's obviously been quite a few
 25 allegations made against you of racism, Mr Tomsett. Do

Page 62

1 **A. Not as far as I was aware, no.**
 2 Q. I briefly want to ask you about another complaint. This
 3 is in relation to D1399. You deal with this at
 4 paragraph 188 of your statement.
 5 **A. Thank you.**
 6 Q. The complaint here is that -- by D1399 that he'd
 7 requested a curtain and you'd been aggressive in
 8 response, told him you'd change his wing and that you'd
 9 make his life difficult. First of all, you say,
 10 Mr Tomsett, at paragraph 189, you say you'd never have
 11 said that you'd make his life difficult; is that right?
 12 **A. No. I don't even recollect that -- this incident. But**
 13 **I wouldn't have said that to him. I'd have advised him**
 14 **if we had curtains or not, and I believe it was dealt**
 15 **with by the manager.**
 16 Q. This is obviously quite similar to one of the previous
 17 allegations, which was about asking you for a curtain
 18 and you getting aggressive in response. In fact,
 19 there's a pattern of allegations about you getting
 20 aggressive in response to requests. Is that something
 21 that you think is fair? Did you get aggressive?
 22 **A. No, I don't think I did.**
 23 Q. Do you think you lost your temper easily?
 24 **A. Not easily, no.**
 25 Q. On occasion, though?

Page 64

16 (Pages 61 to 64)

1 **A. I would say it's happened on occasion.**
 2 Q. How often are we talking? Are we talking once a month,
 3 once a year, once a week, once a day?
 4 **A. Maybe once every couple of months. It's very difficult**
 5 **to sort of judge or come up with something like that.**
 6 Q. The request, again, this time, is for a curtain. Again,
 7 that would be for use of the toilet; yes?
 8 **A. I'm not sure exactly what -- if it was a curtain for the**
 9 **toilet or was it a curtain for the window?**
 10 Q. So would there also be curtains for the windows as well?
 11 **A. Yeah. So it might not necessarily be curtains for the**
 12 **toilet. We could be talking about he wanted curtains**
 13 **for the window. Again, if they wasn't available or they**
 14 **weren't in the room -- I'd go and have a look. You'd**
 15 **generally go up and have a quick check and go, there's**
 16 **no curtains. So you'd either try and take them -- or**
 17 **put the detainee into another room with curtains or take**
 18 **the curtains out and put them into the room that he was**
 19 **in.**
 20 Q. The consequence of not having a curtain for the window
 21 presumably would be that, at 6 am, in the summer, you
 22 might wake up because it would be light?
 23 **A. Yes.**
 24 Q. So that's something which would be quite a big deal for
 25 someone, presumably?

Page 65

1 with a completely open mind?
 2 **A. Yeah, just trying to ascertain what the facts were of**
 3 **each of the complaints that I might have dealt with.**
 4 Q. Did you feel any pressure, or did you feel completely
 5 free to decide one way or another?
 6 **A. Like, was I the one that was making the decisions on --**
 7 Q. For example, some of the former detainees have given
 8 evidence saying that when they made a complaint, it
 9 would just be found to be unsubstantiated, officers
 10 would just back each other up. Did you feel any
 11 pressure to back up other officers?
 12 **A. No.**
 13 Q. We have seen that some of the allegations against you,
 14 but also some other allegations before this inquiry,
 15 a detained person complains and says that something
 16 happened or someone said something, the staff member
 17 denies it and it is one person's word against the other.
 18 What approach would you take to investigating
 19 a complaint where that was the case?
 20 **A. To get statements from everybody that was sort of, like,**
 21 **involved in that situation at the time and get -- try**
 22 **and get an account from, you know, everyone that was**
 23 **involved.**
 24 Q. If it is just one person's word against another, would
 25 that mean the complaint would be unsubstantiated?

Page 67

1 **A. I think so, if you didn't want to be woken up in the**
 2 **early hours of the morning because of the light coming**
 3 **through.**
 4 Q. Was there a chronic shortage of curtains? Was that an
 5 issue?
 6 **A. I don't know if it there was an actual shortage of**
 7 **curtains. I think it was just the case that when**
 8 **detainees were moved to another wing, they would**
 9 **sometimes take the curtains with them, but not all the**
 10 **time. So when you went and did your checks on the rooms**
 11 **and had the rooms cleaned out, just you found from time**
 12 **to time there was these things missing, so you need to**
 13 **try and replenish them and replace them.**
 14 Q. When people asked you for things like this, do you think
 15 you generally responded reasonably to that?
 16 **A. I think so, yeah. Yeah.**
 17 Q. Moving on to a different issue, Mr Tomsett, when you
 18 became acting DCM in August 2017, you took on a role for
 19 investigating complaints as well; is that right?
 20 **A. Yeah.**
 21 Q. Was there any issue raised by anyone about your fitness
 22 to investigate complaints, given the number of
 23 complaints against you?
 24 **A. No. No-one said anything to me.**
 25 Q. When you were investigating complaints, did you do so

Page 66

1 **A. I literally don't remember. I think if ever I did an**
 2 **investigation, I think I always -- I think I would speak**
 3 **to a senior manager to get clarification on where to**
 4 **move forward with it.**
 5 Q. So you'd seek assistance on how to reach a decision?
 6 **A. Yeah, because I hadn't been doing the job all that long**
 7 **and not having had any sort of training with regards to**
 8 **investigating and dealing with, you know, complaints**
 9 **like that, then I would need to go and -- if I remember**
 10 **rightly, I'd go and speak to a senior manager so I knew**
 11 **what sort of direction to take with it.**
 12 Q. We have obviously been over some of the complaints made
 13 against you, and obviously some of the complaints that
 14 you investigated as well. In your experience, did you
 15 think that it was easy for detained people to make
 16 complaints?
 17 **A. Well, yeah, I mean, I think the process was quite easy**
 18 **and straightforward, that if they wasn't -- if**
 19 **a detainee wasn't satisfied with something, they could**
 20 **fill out a complaint form, which would be on the wing,**
 21 **or in the library or the welfare centre, they could fill**
 22 **out a complaint form, and then that would go to the**
 23 **Home Office.**
 24 MR LIVINGSTON: I want to ask a couple of questions about
 25 use of force in general. Before we do, chair, would it

Page 68

17 (Pages 65 to 68)

<p>1 be possible just to have a five-minute break?</p> <p>2 THE CHAIR: Indeed, of course.</p> <p>3 MR LIVINGSTON: If you could rise for five minutes.</p> <p>4 (11.28 am)</p> <p>5 (A short break)</p> <p>6 (11.38 am)</p> <p>7 MR LIVINGSTON: Mr Tomsett, there's been a request from one</p> <p>8 of the core participants if you can take your mask off</p> <p>9 just for five seconds. Is that okay?</p> <p>10 A. Yes, sure.</p> <p>11 Q. You can put it back on now.</p> <p>12 A. Okay.</p> <p>13 Q. Just a couple of questions about use of force in</p> <p>14 general. Paragraph 94 of your statement, Mr Tomsett,</p> <p>15 you say that you tried to avoid force in general and</p> <p>16 that detainees were always given the opportunity to walk</p> <p>17 of their own accord; is that right --</p> <p>18 A. Yes.</p> <p>19 Q. -- in your experience?</p> <p>20 A. Is that in terms of, like, planned --</p> <p>21 Q. Well, either. I mean, you've said that detainees were</p> <p>22 given the opportunity to walk of their own accord, so --</p> <p>23 A. In C&Rs, yeah.</p> <p>24 Q. -- presuming this is situations where detainees were</p> <p>25 being taken to the CSU or being escorted for removal or</p> <p style="text-align: center;">Page 69</p>	<p>1 Mr Tomsett, in your statement, at paragraphs 126 and</p> <p>2 128, that you used reasonable and necessary force, and</p> <p>3 in response to the allegation that you put your hands</p> <p>4 around his neck or throat, you say that you never did</p> <p>5 that?</p> <p>6 A. Absolutely not.</p> <p>7 Q. Did you ever put your hands around a detained person's</p> <p>8 neck or throat?</p> <p>9 A. No, ever, no.</p> <p>10 Q. You filled out a lengthy incident report form about this</p> <p>11 incident. We have it in the bundle. I don't need to</p> <p>12 bring it up, but for the record it is <INN000018>. You</p> <p>13 included in that, Mr Tomsett, that you were verbally</p> <p>14 abused almost every day, and usually threatened in one</p> <p>15 way or another; is that right?</p> <p>16 A. Yes.</p> <p>17 Q. What impact did that have on you?</p> <p>18 A. Well, just -- it just sort of chips away at you every</p> <p>19 day, doesn't it, and eventually you just get to the</p> <p>20 point where, you know, you don't want to continue</p> <p>21 working there anymore. It's sort of a very different</p> <p>22 environment to working at Brook House as opposed to</p> <p>23 working in a job elsewhere, so, yeah, just -- it just</p> <p>24 chips away at you, just takes a little bit away from you</p> <p>25 each time, and then eventually I, yeah, got to the point</p> <p style="text-align: center;">Page 71</p>
<p>1 things like that. In your experience, detainees were</p> <p>2 always given the opportunity to walk of their own accord</p> <p>3 first; is that right?</p> <p>4 A. That's generally -- yes, generally the case, like with</p> <p>5 planned C&Rs. It's not often the case if it was sort of</p> <p>6 like a spontaneous use of force.</p> <p>7 Q. You say that force was always the last resort and that</p> <p>8 you tried to avoid using C&R techniques, talking to</p> <p>9 detainees to calm down the situation first. Is that</p> <p>10 something you did?</p> <p>11 A. Yes. C&R was to be used as a, like, last resort, yes.</p> <p>12 Q. Were there any staff that you perceived as not taking</p> <p>13 that approach?</p> <p>14 A. Not as far as I'm aware.</p> <p>15 Q. Did you ever see a colleague of yours using excessive</p> <p>16 force or unnecessary force?</p> <p>17 A. I haven't, no.</p> <p>18 Q. You have never seen a colleague doing that?</p> <p>19 A. I haven't, no.</p> <p>20 Q. Other than in Panorama, presumably?</p> <p>21 A. Other than viewing Panorama.</p> <p>22 Q. I want to ask you about an incident involving force used</p> <p>23 against someone we know as D1020. I'm not going to ask</p> <p>24 you in detail about it because the incident postdates</p> <p>25 the relevant period, but at a high level, you say,</p> <p style="text-align: center;">Page 70</p>	<p>1 where I decided to leave.</p> <p>2 Q. Did you -- did it affect the way that you saw detainees?</p> <p>3 Do you think that the fact that you say you were</p> <p>4 receiving this verbal abuse and threats from detainees,</p> <p>5 did that affect the way that you saw them?</p> <p>6 A. Not so much, no. Not the way that I saw them. But it</p> <p>7 might have been maybe in some of the areas that you've</p> <p>8 covered where I've said things that I shouldn't have</p> <p>9 done and I've regretted those. I think, in normal</p> <p>10 circumstances, I probably wouldn't have said those if it</p> <p>11 was in a different environment. As I say --</p> <p>12 Q. So language like describing someone as a "cunt" or</p> <p>13 a "wanker"?</p> <p>14 A. Yeah. It's just my frustration and my stress and my</p> <p>15 anxiety coming out, just because of those situations and</p> <p>16 having to deal with those things at the time.</p> <p>17 Q. Now, after this incident with D1020, you were suspended</p> <p>18 following this incident; is that right?</p> <p>19 A. That's right.</p> <p>20 Q. Is that the only time you were ever suspended after</p> <p>21 a complaint?</p> <p>22 A. Indeed, yes.</p> <p>23 Q. Were you told or do you have any idea about why you were</p> <p>24 suspended this time but never before?</p> <p>25 A. I was never -- I was never suspended for any of</p> <p style="text-align: center;">Page 72</p>

<p>1 the other complaints that were put towards me.</p> <p>2 Q. Yes.</p> <p>3 A. With this particular incident, I think I was just</p> <p>4 advised that I was going to be suspended pending an</p> <p>5 investigation. That was all I got told. I was sort of</p> <p>6 halfway -- or trying to write a statement out and the</p> <p>7 senior manager told me I had to leave site and I was</p> <p>8 suspended.</p> <p>9 Q. Did it --</p> <p>10 A. That's the only time.</p> <p>11 Q. Would that have surprised you, I suppose, given that</p> <p>12 you'd been subject to probably, I think by that time,</p> <p>13 12 complaints or something like that?</p> <p>14 A. Yep.</p> <p>15 Q. This time you're suspended?</p> <p>16 A. Yes.</p> <p>17 Q. Did you feel that that had anything to do with -- did</p> <p>18 you feel that that had anything to do with Panorama</p> <p>19 having been broadcast the month before?</p> <p>20 A. I don't know. I can't answer that. I don't know.</p> <p>21 Q. Paragraphs 74 to 75 of your statement. You say that you</p> <p>22 don't remember being involved in a disciplinary</p> <p>23 investigation, and you say that, although you were</p> <p>24 suspended on this occasion, this wasn't a disciplinary</p> <p>25 investigation; is that right?</p> <p style="text-align: center;">Page 73</p>	<p>1 for myself. I didn't -- I just thought I'd done as much</p> <p>2 as I could do and I wanted to leave.</p> <p>3 Q. One of the things you say in your statement, Mr Tomsett,</p> <p>4 is that, at paragraph 201, seeing the Panorama programme</p> <p>5 made you think about whether Brook House was somewhere</p> <p>6 where you wanted to work. Why did it have that impact</p> <p>7 on you?</p> <p>8 A. Sorry, can you repeat that?</p> <p>9 Q. Yes. You say at paragraph 201 that seeing the Panorama</p> <p>10 programme made you think about whether Brook House was</p> <p>11 somewhere where you wanted to work. Why did it have</p> <p>12 that impact on you?</p> <p>13 A. All it was, it was just another thing -- you know, it</p> <p>14 was just sort of like another sort of -- "Oh, it's just</p> <p>15 something else", you know, it was a collective of things</p> <p>16 and then, what, with the Panorama coming up and then</p> <p>17 being suspended afterwards for dealing with the</p> <p>18 situation, for me it was just the end. I'd just had</p> <p>19 enough and I didn't want to work there anymore.</p> <p>20 Q. I want to sort of check, are we talking here about what</p> <p>21 you saw in Panorama, so the fact that you saw detained</p> <p>22 people getting abused, or is it --</p> <p>23 A. No, just the fact --</p> <p>24 Q. -- the consequences of Panorama?</p> <p>25 A. Sorry. It was just because it was to do with</p> <p style="text-align: center;">Page 75</p>
<p>1 A. Yeah. I mean, I didn't -- I don't see that as --</p> <p>2 I wasn't aware that it was a disciplinary. If it was,</p> <p>3 like, a disciplinary into my own personal conduct or it</p> <p>4 was, for me, as far as I was aware, it was an</p> <p>5 investigation into a complaint that had been put in by</p> <p>6 not actually that detainee, it was by another detainee</p> <p>7 within the wing, and I think they'd put a complaint in</p> <p>8 for some reason, so the detainee that I had actually</p> <p>9 dealt with hadn't actually put the complaint in.</p> <p>10 Q. But then you were suspended and you were interviewed --</p> <p>11 A. Yes.</p> <p>12 Q. -- about it, so, I mean, if that's not a disciplinary</p> <p>13 investigation, what is?</p> <p>14 A. I understand the question that you're asking me, but</p> <p>15 I didn't -- I wasn't aware that it was a disciplinary.</p> <p>16 Q. Okay. You were never told it was a disciplinary?</p> <p>17 A. No, I didn't.</p> <p>18 Q. You say that even before being suspended, you felt</p> <p>19 unsupported, stressed out and anxious at Brook House; is</p> <p>20 that right?</p> <p>21 A. At times, yes.</p> <p>22 Q. Were you already intending to leave before you were</p> <p>23 suspended?</p> <p>24 A. There was kind of like a build-up, but having been</p> <p>25 suspended, that was, like, my -- that was the last straw</p> <p style="text-align: center;">Page 74</p>	<p>1 Brook House and I'm associated with Brook House, and</p> <p>2 then, all of a sudden, it's on the TV and --</p> <p>3 Q. So it was more about the reputational damage. Okay.</p> <p>4 A. Yeah, yeah. I was just going to -- and then it just</p> <p>5 followed on where, after being suspended for that -- for</p> <p>6 that incident, that was one when I decided that I didn't</p> <p>7 want to work for Brook House no more, G4S.</p> <p>8 Q. Did you watch the Panorama programme when it came out?</p> <p>9 A. Not at the beginning, no.</p> <p>10 Q. Do you remember when you watched it?</p> <p>11 A. Yeah, probably a year later, nine months later.</p> <p>12 Q. So you didn't watch it whilst you were still employed?</p> <p>13 A. Not initially, no.</p> <p>14 Q. Were you not curious as to what was in it?</p> <p>15 A. Well, kind of, but I wasn't, so I just sort of like</p> <p>16 wasn't really interested in watching it at the time.</p> <p>17 Q. You knew, presumably, that some of your colleagues had</p> <p>18 been shown mistreating detained people; yeah?</p> <p>19 A. I hadn't spoken or seen it, so I didn't know what was on</p> <p>20 it.</p> <p>21 Q. But you knew that some of your colleagues had lost their</p> <p>22 jobs about it?</p> <p>23 A. I was aware that my -- yeah, yeah.</p> <p>24 Q. You weren't curious as to what they'd been doing?</p> <p>25 A. No.</p> <p style="text-align: center;">Page 76</p>

1 Q. You put your notice in shortly after returning to work
2 in December 2017; is that right?

3 A. Yes.

4 Q. After your suspension?

5 A. Yes.

6 Q. And you say, "I'd had enough of Brook House and felt
7 that I could not do more than I had been doing". Do you
8 think, looking back, there is anything more you could
9 have done which might have resulted in fewer complaints
10 being made against you and fewer allegations being made
11 against you?

12 A. No.

13 MR LIVINGSTON: That's all my questions for you, Mr Tomsett.
14 Just one final thing: when I asked you to remove your
15 mask earlier, the camera was still on me rather than
16 you. If you would be able to do that again, that would
17 be appreciated, maybe just for ten seconds this time and
18 perhaps that'll be okay.

19 Chair, if you have any questions for Mr Tomsett?

20 Questions from THE PANEL

21 THE CHAIR: Thank you. I do just have two brief questions
22 for you, Mr Tomsett. I just want to make sure that
23 I have understood you correctly. When you were
24 temporarily promoted to DCM, so you then began having
25 a role in terms of investigating complaints --

Page 77

1 Mr Livingston asked you some of these questions
2 before -- did you receive no training whatsoever in how
3 to conduct a complaint investigation?

4 A. Not as far as I'm aware, ma'am. No, I would -- my
5 shadowing or that form of training was to follow an
6 already sort of established DCM, so I would shadow them,
7 but I don't recollect getting any formal training in
8 what you've just asked me.

9 THE CHAIR: Thank you. Do you remember which DCM it was who
10 you shadowed at the time?

11 A. It wasn't, like, one particular --

12 THE CHAIR: Okay.

13 A. Because it would -- because officers would be on
14 a different rota, so maybe I might be with the same DCM
15 for two or three days, and then, a bit later, I might be
16 with a different DCM.

17 THE CHAIR: So it wasn't consistent, necessarily?

18 A. As far as I recollect, no. It wasn't like, oh, that was
19 a DCM I would shadow for a full two or three weeks, or
20 whatever the time period.

21 THE CHAIR: That's fine. Thank you very much. The other
22 question I want to ask you about is, you've talked about
23 that, on occasion, you lost your temper, and you've
24 expressed regret for some of the language that we have
25 heard that you used towards detainees.

Page 78

1 A. Yes, ma'am.

2 THE CHAIR: Did you speak to anybody about the fact that you
3 were sometimes losing your temper? Did you speak to
4 your manager? Did you speak to anybody else?

5 A. No.

6 THE CHAIR: Is there a reason why you didn't do that?

7 A. I think it was -- what we spoke about earlier, I didn't
8 feel there was somebody I could go to and sort of talk
9 to knowing that maybe it would be sort of confidential.
10 I was just aware that there was a habit of people -- it
11 didn't matter if you was a senior manager or a DCO or --
12 it was just an issue with gossip and people were always
13 gossiping. I didn't want to sort of --

14 THE CHAIR: I don't want to put words in your mouth, but are
15 you saying you didn't necessarily have any faith in
16 being able to go to somebody and trusting that that
17 would be dealt with appropriately?

18 A. Personally, yes. That's just how I felt about it.

19 THE CHAIR: Those are all my questions, thank you very much.
20 I do understand, Mr Tomsett, it's not an easy experience
21 but it's been important to hear your evidence. So thank
22 you very much for coming this morning.

23 A. No problem.

24 (The witness withdrew)

25 MR LIVINGSTON: Chair, we will now take our mid-morning

Page 79

1 break, long enough for people to get a cup of tea.
2 15 minutes? Can I suggest we return at 12.10 pm for
3 Mr Bromley?

4 THE CHAIR: Thank you very much.

5 (11.52 am)

6 (A short break)

7 (12.12 am)

8 MS MOORE: Thank you, chair. We have the evidence of
9 Mr Ryan Bromley.

10 MR RYAN JOHN BROMLEY (sworn)

11 Examination by MS MOORE

12 MS MOORE: Good morning, Mr Bromley.

13 A. Good morning.

14 Q. Could you give us your full name?

15 A. Ryan John Bromley.

16 Q. You should have a folder of documents in front of you.
17 I may refer you to those or they will also be shown on
18 that screen that you can see on the left there. So
19 rather than having to turn them up, you can look at the
20 screen. At tab 1 of that folder in front of you,
21 though, is your witness statement, which you made to the
22 inquiry and you signed on 2 February 2022. That will be
23 adduced in full, please, chair. The reference for that
24 is <SER000434>. What that means is, we won't go through
25 everything in your statement today. That's already in

Page 80

20 (Pages 77 to 80)

<p>1 your evidence. We will just focus on some of the key</p> <p>2 issues. You might just want to have that open and, if</p> <p>3 I ask you about something you say in your statement,</p> <p>4 I will tell you which paragraph. So if you need to</p> <p>5 remind yourself, you can.</p> <p>6 Mr Bromley, you worked at Brook House for two</p> <p>7 different periods of time; is that right?</p> <p>8 A. That's correct.</p> <p>9 Q. There was December 2016 to December 2017, and then you</p> <p>10 went travelling and you returned in around 2020 and you</p> <p>11 still work there now?</p> <p>12 A. That's correct.</p> <p>13 Q. Have you always been a DCO?</p> <p>14 A. Yeah, I've always been a DCO.</p> <p>15 Q. I understand now you're within the activities team?</p> <p>16 A. Yeah, I'm the gym officer. But that's still a detainee</p> <p>17 custody officer.</p> <p>18 Q. So you're no longer on the wings?</p> <p>19 A. No.</p> <p>20 Q. How does being in the gym compare to being on the wings?</p> <p>21 A. It's a lot different. So, obviously, I don't have to --</p> <p>22 I'm not involved in, like, lock-up. The only time</p> <p>23 I really go on the wings is to cover breaks.</p> <p>24 Q. Are the hours different?</p> <p>25 A. I think there's about a half-hour difference between the</p> <p style="text-align: center;">Page 81</p>	<p>1 A. Yes.</p> <p>2 Q. I won't give your date of birth, but you were in your</p> <p>3 early 20s, I think, when Panorama was shown?</p> <p>4 A. That's correct.</p> <p>5 Q. Compared to other people there, you were one of the more</p> <p>6 experienced people left. Was it a permanent move to</p> <p>7 a DCM role you were offered --</p> <p>8 A. No.</p> <p>9 Q. -- or a temporary?</p> <p>10 A. No, it wasn't permanent.</p> <p>11 Q. Can you tell us why you turned that down?</p> <p>12 A. I have no intentions of moving into management.</p> <p>13 Q. Why didn't you want to be in management?</p> <p>14 A. I was just happy in my job and, for me, the work/life</p> <p>15 balance is more important than pay grades.</p> <p>16 Q. Did you understand that people would sort of take work</p> <p>17 home with them if they were DCMs and not so much if they</p> <p>18 were DCOs?</p> <p>19 A. Possibly. I can only speak for the job I have done.</p> <p>20 Q. You also say at paragraph 5:</p> <p>21 "I would have been expected to take on this role for</p> <p>22 the same salary as I was on as a DCO."</p> <p>23 Is that right?</p> <p>24 A. That's correct, because I haven't been offered the job.</p> <p>25 Q. Do you know why that would have been? So you were kind</p> <p style="text-align: center;">Page 83</p>
<p>1 start of my shift and the end of the shift --</p> <p>2 Q. And I understand --</p> <p>3 A. -- (overspeaking) officers.</p> <p>4 Q. Sorry. I understand you prefer the role you have now</p> <p>5 compared to being on the wings?</p> <p>6 A. Yes.</p> <p>7 Q. There was a time after Panorama, but before you left to</p> <p>8 go travelling, when you were asked to take on a DCM</p> <p>9 role. Sometime, then, it must have been,</p> <p>10 between September 2017 and you handing in your notice</p> <p>11 in November 2017. You cover this at paragraph 5 of your</p> <p>12 statement, which is on page 2. You describe -- you</p> <p>13 think the reason why you were asked to be a DCM is that</p> <p>14 you were one of the last experienced officers on the</p> <p>15 wing. Do you mean you were one of the most experienced</p> <p>16 people left after Panorama?</p> <p>17 A. Yeah, that's correct.</p> <p>18 Q. Did you consider yourself quite experienced at that</p> <p>19 point?</p> <p>20 A. I was considered -- I would say so, compared to what was</p> <p>21 there at the time.</p> <p>22 Q. So you'd worked at Brook House since, as I said,</p> <p>23 December 2016, so less than a year. I think some of</p> <p>24 that would have been the ITC, which is an eight-week</p> <p>25 course?</p> <p style="text-align: center;">Page 82</p>	<p>1 of acting up as a DCM but you still get paid as a DCO?</p> <p>2 A. I think just being a more experienced member of staff in</p> <p>3 the wing would be just organising the wing with the</p> <p>4 officers that aren't so experienced.</p> <p>5 Q. So you're sort of acting as a DCM but you're not</p> <p>6 officially a DCM so you don't get paid any more?</p> <p>7 A. Exactly.</p> <p>8 Q. You discuss life at Brook House and culture and working</p> <p>9 conditions in some detail in your statement. I wanted</p> <p>10 to ask you about something you say at paragraph 29,</p> <p>11 which is on page 8, under the subheading "Culture".</p> <p>12 A. Right.</p> <p>13 Q. You discuss the shift work, the shift patterns. You say</p> <p>14 that, during the relevant period, DCOs were contracted</p> <p>15 to work 49 hours of shift work per week. Is that right?</p> <p>16 A. Yes, that's correct.</p> <p>17 Q. You say that's usually 8 am until 9 pm and that could be</p> <p>18 four days in a row, one off and then two on?</p> <p>19 A. Yeah, I believe so.</p> <p>20 Q. Then would it be another one off and then it starts</p> <p>21 again with another 4?</p> <p>22 A. Unfortunately, I can't remember the exact roster we had.</p> <p>23 Q. Not to worry. But, as I said, 8 am until 9 pm most</p> <p>24 days?</p> <p>25 A. Yes.</p> <p style="text-align: center;">Page 84</p>

1 Q. You say in your statement that on some nights, in fact,
2 you wouldn't leave until midnight?
3 **A. That could be the case.**
4 Q. What sort of reasons would mean that you'd have to stay
5 that long?
6 **A. It could be due to a certain resident has a flight, it**
7 **could be a charter. It could be refusing to lock up, so**
8 **you're required to stay and you can't leave site until**
9 **that's the case.**
10 Q. So you can't leave unless everything's done?
11 **A. No.**
12 Q. Would you be paid for staying late if you had to stay
13 a few extra hours?
14 **A. No, you would get time in lieu, so TOIL.**
15 Q. So you'd get time in lieu that you could use at a later
16 date. So, say, you stay until midnight and you're due
17 in at 8 am the next morning, do you still have to come
18 in at 8 am?
19 **A. You still have to come at 8 am.**
20 Q. Then, at some later point, you can use the hours you've
21 accrued. So you could be quite tired if you had to stay
22 out until midnight and start again at 8.00?
23 **A. Possibly.**
24 Q. I suppose it depends how long you have to travel home.
25 You also say that morale was low during the relevant

Page 85

1 month or so, or you were searched less than that?
2 **A. I couldn't give you a number, to be honest.**
3 Q. Do you remember being searched?
4 **A. Yeah, I remember being searched.**
5 Q. But not every day?
6 **A. No.**
7 Q. Did people talk about suspicions about how the drugs
8 might be getting in among the staff or among the
9 detainees?
10 **A. I don't remember any certain conversations. I think it**
11 **was just common knowledge of there was a lot of drugs in**
12 **the centre. No-one has pinpointed where it's coming in**
13 **at.**
14 Q. Something you say which helped your morale from your
15 statement was working with the same people, so people
16 who you could trust. Would that be DCOs on the wing who
17 you were often working with?
18 **A. Yeah, yeah.**
19 Q. Do you tend to sort of be with the same people who were
20 based on the wing for extended periods of time?
21 **A. Yeah, back then, you used to be given a wing and you**
22 **kind of -- that was where you done most of your shifts.**
23 Q. When you say "back then", is it different now because
24 you're in the gym or is it different for all DCOs as far
25 as you know?

Page 87

1 period and you link this to, in part, staff turnover.
2 So, at paragraph 30, which starts with "During the
3 relevant period, I believe that the morale of staff
4 overall was very low", you say:
5 "Staff turnover was so bad that you almost did not
6 know who you could trust because at the time there was
7 also a big problem with drugs and it was difficult to
8 pinpoint where it was getting in from."
9 Does that mean you had some suspicion that there
10 might be staff who were bringing in drugs?
11 **A. I wouldn't know if it was suspicion of staff. I just**
12 **knew there was drugs in the centre.**
13 Q. Why does that relate to the turnover of staff?
14 **A. It could be -- there's not too many ways to get,**
15 **I suppose, drugs into the centre. It's not in the**
16 **public access and there's so much staff going into the**
17 **building, it's not just DCOs, it could be cleaning**
18 **staff, management.**
19 Q. Visitors are searched, I think, aren't they?
20 **A. Visitors are searched, correct.**
21 Q. But staff wouldn't be searched regularly; is that right?
22 **A. Not regularly.**
23 Q. Occasionally?
24 **A. Occasionally, yeah.**
25 Q. Do you remember how often, sort of approximately every

Page 86

1 **A. I don't know how it is now for the DCOs.**
2 Q. Thinking about your sort of working circle, the people
3 who you saw regularly at work at the time, that was some
4 DCOs. Were there any DCMs who you would work with
5 regularly or did they change more often?
6 **A. They changed day to day. Normally, there wouldn't be --**
7 **there might be two managers between four or five wings.**
8 Q. Do you remember if any of those DCMs were specifically
9 your line manager in 2017?
10 **A. To be honest, I can't remember.**
11 Q. You also talk about staffing levels. So this is page 18
12 of your statement. Paragraphs 75 to 76. It is under
13 the head "Staffing levels". In summary, you say that,
14 during the relevant period, Brook House was "extremely
15 understaffed", in your words. You say there was usually
16 three officers on a wing. So that's three DCOs per
17 wing. But there were so many control and restraints
18 that, in reality, there was only two people. Was there
19 a particularly high number of control and restraints
20 during the relevant period, such that people kept on
21 being taken off the wing to attend them?
22 **A. Yes.**
23 Q. Do you have any thoughts why it was so high during this
24 time?
25 **A. I'm not involved in making the decisions, but there**

Page 88

22 (Pages 85 to 88)

<p>1 could be charters, flights.</p> <p>2 Q. You say that, due to understaffing, it could be</p> <p>3 a dangerous place for staff?</p> <p>4 A. I agree.</p> <p>5 Q. Would you say it was also potentially dangerous for</p> <p>6 detained people?</p> <p>7 A. Yeah, you could say that.</p> <p>8 Q. Generally, what was the effect of the low staffing</p> <p>9 levels on morale? Did it -- what was the effect on the</p> <p>10 people working day to day when maybe there was two of</p> <p>11 you being made to cover a wing of 100 or so people?</p> <p>12 A. If there was just two officers on a wing, it could be</p> <p>13 challenging at times. I mean, like, the Dove wing that</p> <p>14 I worked on, it had three floors, so just during lock-up</p> <p>15 times, you've got to lock up three floors between two of</p> <p>16 you. So just that alone could be challenging.</p> <p>17 Q. You talk also about -- the teams used for use of force</p> <p>18 procedures, and you mention this at paragraph 84, which</p> <p>19 is page 20. You say -- it is about a specific question,</p> <p>20 but I wanted to ask you the general point:</p> <p>21 "The teams that were used for procedures like use of</p> <p>22 force rarely changed and so I'd say that my confidence</p> <p>23 in carrying out procedures such as use of force was not</p> <p>24 affected by high staff turnover."</p> <p>25 Help me with that, teams been rarely changed. Were</p> <p style="text-align: center;">Page 89</p>	<p>1 A. Yes.</p> <p>2 Q. You're experienced because you did it more at</p> <p>3 Brook House or was it from your job beforehand that you</p> <p>4 got the experience?</p> <p>5 A. No, just from Brook House.</p> <p>6 Q. You mention at the top of page 24 in relation to</p> <p>7 a particular use of force incident:</p> <p>8 "Often when participating in use of force incidents,</p> <p>9 you are running on adrenaline and everything can move so</p> <p>10 quickly."</p> <p>11 So just thinking about not just this particular</p> <p>12 example, but generally, you say you're running on</p> <p>13 adrenaline. Obviously it can be quite pressured, as an</p> <p>14 environment and as a moment to act in. When does the</p> <p>15 adrenaline start to kick in -- is it when it starts, is</p> <p>16 it beforehand?</p> <p>17 A. I can only talk for myself, but, for me, the adrenaline</p> <p>18 starts from the moment that you're told you're going to</p> <p>19 be involved, and my adrenaline is just to make sure I'm</p> <p>20 focused and with the job in hand. I don't talk about it</p> <p>21 to others. I normally stay quite quiet during the</p> <p>22 briefs and even after.</p> <p>23 Q. How does the team generally prepare itself for the</p> <p>24 moment? You obviously have a briefing?</p> <p>25 A. Yeah, so you have a briefing, you'd be briefed on the</p> <p style="text-align: center;">Page 91</p>
<p>1 there some staff who were either volunteering or were</p> <p>2 more frequently chosen than others to do use of force?</p> <p>3 A. I don't know about the decision-making on picking teams.</p> <p>4 I just know the individuals were 90 per cent of the time</p> <p>5 the same.</p> <p>6 Q. You don't know about the decisions. Who was it who</p> <p>7 would select teams?</p> <p>8 A. The manager in charge of the C&R.</p> <p>9 Q. Do you get a call saying, "You've been chosen"?</p> <p>10 A. Yes, you'd get a call to go and collect your kit and</p> <p>11 meet someone for a brief.</p> <p>12 Q. You were one of the people who was used more frequently,</p> <p>13 you say?</p> <p>14 A. Yes.</p> <p>15 Q. Do you know why that is?</p> <p>16 A. No.</p> <p>17 Q. Did some staff members seem to particularly dislike, or</p> <p>18 maybe like, being involved in use of force more than</p> <p>19 others?</p> <p>20 A. I mean, I can only talk for myself. I'm good, I'm</p> <p>21 experienced. I wouldn't say I enjoy it because there is</p> <p>22 no perks to doing C&Rs. Everyone is on the same money,</p> <p>23 it doesn't change because you do C&Rs.</p> <p>24 Q. You say you're experienced in it. So you've obviously</p> <p>25 done the same training as everybody else?</p> <p style="text-align: center;">Page 90</p>	<p>1 resident's name, his weight, his height, could be</p> <p>2 previous behaviour, previous convictions, and the</p> <p>3 condition that the detainee is in now.</p> <p>4 Q. You say during these you would stay quite quiet?</p> <p>5 A. I'd always stay quiet.</p> <p>6 Q. You discussed a number of specific people you were asked</p> <p>7 about by the inquiry and one of them is Yan Paschali?</p> <p>8 A. Yes.</p> <p>9 Q. You say in relation to him -- I will read it, but it is</p> <p>10 page 48:</p> <p>11 "The only knowledge I had of Yan is he was a big</p> <p>12 character on E wing. I was informed that he had</p> <p>13 previously worked at HMP Belmarsh before Brook House.</p> <p>14 He was known to be a very tough guy. The only time</p> <p>15 I worked with Yan would have been during use of force</p> <p>16 incidents."</p> <p>17 So was he one of the people who was also quite</p> <p>18 frequently picked for use of force incidents?</p> <p>19 A. That's correct.</p> <p>20 Q. So you would find yourself on the same team as him</p> <p>21 relatively frequently?</p> <p>22 A. Possibly.</p> <p>23 Q. Did you have any idea about why he was picked?</p> <p>24 A. Just, probably, the size of the guy.</p> <p>25 Q. I want to ask you now then about a few specific</p> <p style="text-align: center;">Page 92</p>

<p>1 incidents, Mr Bromley. As I have said, you provided 2 a statement which deals with lots of different matters 3 and lots of incidents within it. I want to focus on 4 just a couple. So we have your evidence about the 5 others, we have statements from other people involved 6 and we have an expert report as well. I'm not going to 7 take you to each of them. But I do want to ask you 8 about 4 May, which is the use of force on D1527 on 9 4 May 2017. This is covered in your statement at 10 pages 25 to 26. So paragraphs 104 to 107.</p> <p>11 The inquiry has heard before about the events of 12 4 May 2017. So D1527 had jumped onto netting in D wing. 13 He had been persuaded to come off the netting and two 14 other residents went to sit with him. There was 15 a decision then made to relocate him. Your statement 16 says he was going to be relocated to E wing although 17 some of the paperwork says CSU. Were you aware of 18 the netting incident or were you only involved later?</p> <p>19 A. I have no knowledge on the netting incident now. 20 Obviously it's five years ago. But I know it was the 21 policy, if someone did jump on the netting, it would be 22 possible for them to go down to E wing, to CSU.</p> <p>23 Q. You say at 104 and 105, and you have just said now, you 24 only have a vague recollection now. It was obviously 25 five years ago. But the account that you wrote after</p> <p style="text-align: center;">Page 93</p>	<p>1 Q. So somewhere residents couldn't access. A sterile area; 2 is that right?</p> <p>3 A. Yes, a sterile area.</p> <p>4 Q. Can we have a look at the documentation, <CJS005530>. 5 It is also at tab 6, chair, but we will show it on the 6 screen. We have seen these before. They have a red 7 cover for the use of force report. This is obviously 8 the one in relation to D1527. The date is there, 9 4 May 2017, and the time is 17:25. It is an unplanned 10 use of force, if you scroll down, and the nature of it 11 is handcuffs were applied for five minutes to the 12 detainee. Can we go to page 13, please. If we just 13 scroll up so we can see the whole form. This is your 14 account. It's got your name. There. It is dated 15 26/4/2017 which is obviously wrong. At the end of it, 16 where you signed it, it's got the correct date. I'm 17 guessing it's because maybe you've used one that you've 18 filled in so you don't have to copy your CID number 19 every time or something like that. But there is no 20 suggestion you filled this in on 26 April obviously. 21 The date was after the event, on the 4th. You record 22 there, if you scroll down a little, that you are on the 23 left arm, so you have crossed "next to left arm" if we 24 go to page 14 is your written account. As I say, you 25 find it. Starting with that big paragraph there:</p> <p style="text-align: center;">Page 95</p>
<p>1 your involvement would be the most accurate?</p> <p>2 A. That's correct.</p> <p>3 Q. That's because you'd have written it on the same day?</p> <p>4 A. Yeah.</p> <p>5 Q. After this incident, or after use of force incidents 6 generally, tell me about how you'd go and end up writing 7 your report. Do you have your debrief and then write 8 your report?</p> <p>9 A. Yes. So, as a team, you'd all have your debrief. And 10 it's if any injuries are present. You would then be 11 given time away from the wing to write your report. It 12 had to be done, back then, within 24 hours, but normally 13 you would do it straight after.</p> <p>14 Q. They are typed up, so do you go and use a computer?</p> <p>15 A. They are all typed up now. But, back then, there was 16 limited computers, so sometimes they might be hand done. 17 But if you could get a computer, you'd do it on the 18 computer.</p> <p>19 Q. You're right, sorry, some we have seen for the relevant 20 period are filled in by hand and some are typed. If 21 they are typed, as yours is on this occasion, would you 22 have gone to the wing office to use the computer?</p> <p>23 A. I wouldn't have gone to the wing office. I would have 24 gone somewhere quiet like admin, and just found 25 somewhere quiet.</p> <p style="text-align: center;">Page 94</p>	<p>1 "On May 4 2017, at approximately 17:15 on D wing 2 level 1, myself and DCO Mohammed Sheharyar Shaukat were 3 asked by DCM Steve Dix and DCM Michael Yates to wait 4 outside the room to which DCM Dix had begun verbal 5 communication with detainee D1527 following the detainee 6 coming off the first floor netting."</p> <p>7 So DCM Michael Yates is sometimes referred to as 8 DCO. I think he was acting up at the time. In any 9 event, one of those two gentlemen asked you to wait 10 outside the room. Do you think that would have been, 11 "In case you're needed, wait outside, but we don't need 12 you inside right now"?</p> <p>13 A. Possibly.</p> <p>14 Q. Would you have known at this point they were planning to 15 relocate him to E wing?</p> <p>16 A. No, I would have no knowledge on that.</p> <p>17 Q. When you're outside the room, can you see in?</p> <p>18 A. Unfortunately, I can't remember if the door was open or 19 closed.</p> <p>20 Q. Reading on:</p> <p>21 "At approximately 17:23, myself and DCO Shaukat 22 entered the detainee's room following hearing detainee 23 D1527 aggressively shouting."</p> <p>24 So about eight minutes later, although obviously the 25 times are a bit of an estimate, you enter together and</p> <p style="text-align: center;">Page 96</p>

<p>1 the reason, you say here, is because you hear shouting.</p> <p>2 Why would that make you enter a room generally?</p> <p>3 A. Because of the shouting in an aggressive manner.</p> <p>4 Q. Why --</p> <p>5 A. Duty of care. So I would have entered the room to see</p> <p>6 what was going on.</p> <p>7 Q. You don't say you were called in by one of the DCMs. It</p> <p>8 likes like, as you say, you hear someone shouting so you</p> <p>9 go in to see what's happening. You say:</p> <p>10 "... upon entering, detainee D1527 reached for his</p> <p>11 right pocket while trying to swallow his phone to which</p> <p>12 he didn't succeed and instead he dropped it onto the</p> <p>13 floor in the room by mistake. Immediately, D1527 stood</p> <p>14 up from sitting on the bed in an aggressive manner with</p> <p>15 both fists closed, insulting DCM Dix, and then reached</p> <p>16 for the phone for the second time."</p> <p>17 Given you say he stood up from sitting on the bed,</p> <p>18 it sounds, from your account, like he was sitting on the</p> <p>19 bed when you entered and then stood up:</p> <p>20 "From there he dropped his phone which he had been</p> <p>21 trying to swallow."</p> <p>22 You say in your statement he was trying to swallow</p> <p>23 a phone battery and in your account it says "mobile</p> <p>24 phone". Can you remember which one was correct?</p> <p>25 A. It would have been the phone battery. Phones are quite</p> <p style="text-align: center;">Page 97</p>	<p>1 my job.</p> <p>2 Q. It looks like, before this point, there had been no</p> <p>3 contact between the staff and the detainee since you'd</p> <p>4 entered the room. He was on the bed. You'd entered the</p> <p>5 room and then the first contact was to stop him from</p> <p>6 getting the phone battery, from what you said.</p> <p>7 DCM Dix's involvement, from your account, was at the</p> <p>8 point of applying the handcuffs, after the locks had</p> <p>9 been released. So that's after his arms had been put in</p> <p>10 the right position and the handcuffs go on. Is that</p> <p>11 right? Lastly on this page, the last line of the big</p> <p>12 paragraph:</p> <p>13 "He complied to a full search once entered ..."</p> <p>14 This is after he's on E wing:</p> <p>15 "... at approximately 17:40."</p> <p>16 Who would have to decide about whether a detainee</p> <p>17 can be fully searched?</p> <p>18 A. Upon being relocated?</p> <p>19 Q. Yes.</p> <p>20 A. I believe that's the policy. Once you get relocated, it</p> <p>21 would be the policy to search him to make sure there's</p> <p>22 no -- there's nothing on him that could harm him.</p> <p>23 Q. You conclude at the end:</p> <p>24 "I believe that the force used was proportionate to</p> <p>25 the seriousness of the situation."</p> <p style="text-align: center;">Page 99</p>
<p>1 hard to swallow.</p> <p>2 Q. You say:</p> <p>3 "He reached for the phone a second time."</p> <p>4 So it's on the floor, he's reaching for it. Then</p> <p>5 you say:</p> <p>6 "At this point DCO Shaukat took control on</p> <p>7 detainee 1527's head while myself took control of his</p> <p>8 left arm and DCM Michael Yates took control of his right</p> <p>9 arm. Once all locks were applied at approximately 17:26</p> <p>10 DCM Dix applied handcuffs on detainee 1527."</p> <p>11 Then you say you escorted him to E wing. It looks</p> <p>12 from this that DCO Shaukat made the first contact with</p> <p>13 his head, you on the left arm, Mr Yates on the right</p> <p>14 arm. Can you help us with why reaching for his phone</p> <p>15 would necessitate force being applied to him or him</p> <p>16 being restrained?</p> <p>17 A. If the detainee is trying to self-harm and he --</p> <p>18 obviously, if he's going to try and get a battery in his</p> <p>19 mouth, the last thing you want him to do is to succeed</p> <p>20 and actually get the battery in his mouth.</p> <p>21 Q. So it's to stop him from --</p> <p>22 A. Yes.</p> <p>23 Q. Can you help us with why the first thing to do might be</p> <p>24 to take control of the head?</p> <p>25 A. I can't talk for another officer. I was only following</p> <p style="text-align: center;">Page 98</p>	<p>1 I think you have already told us why you think force</p> <p>2 was needed?</p> <p>3 A. Yes, I believe the force was reasonable.</p> <p>4 Q. It was needed to ...?</p> <p>5 A. Duty of care for the detainee's welfare.</p> <p>6 Q. To stop him from reaching the phone battery; you said</p> <p>7 that before. Then just on to 15, just to finish off</p> <p>8 your part of this form, you have circled the left arm,</p> <p>9 and then, at 16, just so there is no doubt about it, you</p> <p>10 have signed it and dated it and it is "04/05" there, so</p> <p>11 the day it happened, at some point between when it</p> <p>12 happened and when you went home.</p> <p>13 Your witness statement also says that you can't</p> <p>14 comment on the accounts of others and, as I said,</p> <p>15 that's, as you say, because your account would have been</p> <p>16 the best recollection you have on the day it happened.</p> <p>17 The reason I'm asking is because we have a number of</p> <p>18 different accounts.</p> <p>19 If we can turn to page 11, please. You can help us</p> <p>20 as far as you can with this. This is Mr Shaukat's</p> <p>21 account of the events. If we look at that big first</p> <p>22 paragraph when we start with "Mr", so about halfway down</p> <p>23 that big paragraph:</p> <p>24 "Mr D1527 jumping on the netting."</p> <p>25 This is when we get into the incident in the room:</p> <p style="text-align: center;">Page 100</p>

<p>1 "At approximately 17:20 hours Mr Dix entered the</p> <p>2 room where Mr D1527 was present and advised Mr D1527 to</p> <p>3 walk to the E wing following his aggressive behaviour.</p> <p>4 At approximately 17:23, I, DCO Shaukat and DCO Bromley</p> <p>5 entered the room due to the loud aggressive tone</p> <p>6 Mr D1527 was using towards DCM Dix."</p> <p>7 It says he asked for co-operation but he was not</p> <p>8 willing to co-operate:</p> <p>9 "... stood up from the bed he was sitting on in an</p> <p>10 aggressive manner with both fists closed and tried to</p> <p>11 reach for his right pocket while trying to swallow his</p> <p>12 phone which then fell off."</p> <p>13 He's dropped it, perhaps. Then he goes on to say</p> <p>14 his name:</p> <p>15 "... took control of Mr D1527's head inside the</p> <p>16 room. Officers 2 and 3 then took control of Mr D1527's</p> <p>17 right and left arm as soon as they had locks on.</p> <p>18 Mr D1527 was then handcuffed by Steve Dix."</p> <p>19 So it is quite similar to your account. Mr Shaukat</p> <p>20 said he took control of the head. It says officers 2</p> <p>21 and 3 took control of the right and left arm. By</p> <p>22 "officers 2 and 3", would he mean the other two officers</p> <p>23 who were there?</p> <p>24 A. That's correct.</p> <p>25 Q. We know that there was obviously you, Mr Yates was there</p> <p style="text-align: center;">Page 101</p>	<p>1 do this. For this reason I felt fearful for his safety</p> <p>2 as he has a history of self-harm but also fearful for my</p> <p>3 own safety, so spontaneous force was required to prevent</p> <p>4 a possible weapon being produced.</p> <p>5 "I DCM S Dix took control of Mr D1527's right arm</p> <p>6 attempting to get it into a backhammer before handing</p> <p>7 over to DCO M Yates once officers came to assist."</p> <p>8 Then it says:</p> <p>9 "Once officers had control of [him] DCM Dix placed</p> <p>10 his left wrist into a handcuff followed by his right</p> <p>11 wrist."</p> <p>12 So he recalls being in the room with D1527. He</p> <p>13 doesn't mention the shouting you say you heard from</p> <p>14 outside. He doesn't mention seeing a phone, a phone</p> <p>15 falling on the floor or D1527 trying or threatening to</p> <p>16 swallow a phone. He says that D1527 put his hands in</p> <p>17 his pockets and refused, when asked, to empty his</p> <p>18 pockets and he didn't know what was in them. And he</p> <p>19 says he took control of D1527's right arm and attempted</p> <p>20 to get it into a backhammer before handing over to</p> <p>21 Mr Yates once officers came to assist. So it sounds</p> <p>22 from his account that he believed he was the first one</p> <p>23 to make contact, and then, after that had happened,</p> <p>24 officers came to assist. And obviously you recalled it</p> <p>25 differently. You believe that you entered the room</p> <p style="text-align: center;">Page 103</p>
<p>1 although he's sometimes a DCO and sometimes a DCM in the</p> <p>2 paperwork. Was there also a third man in the room, do</p> <p>3 you recall, Mr Ben Wright, DCO Ben Wright?</p> <p>4 A. I have no memory of anyone else.</p> <p>5 Q. Is it right to say that if somebody hasn't put hands on</p> <p>6 a detainee, they don't always fill in a use of force</p> <p>7 form?</p> <p>8 A. Back then, that was the policy. I believe now, if you</p> <p>9 are involved in the incident, you'd have to do at least</p> <p>10 an incident report.</p> <p>11 Q. Even if you just saw it. Then if we go to page 8,</p> <p>12 please, of the same document. This is Mr Dix's account.</p> <p>13 In the paragraph that starts "A short while later", so</p> <p>14 the second paragraph. First he talks about the detainee</p> <p>15 being on the netting:</p> <p>16 "A short while later I went back to that room to</p> <p>17 speak to D1527 about his actions."</p> <p>18 He says he explained the reasons:</p> <p>19 "I explained due to his behaviour that he would need</p> <p>20 to comply and go the CSU on rule 40 and he said no.</p> <p>21 I explained if he refused, then potentially, as</p> <p>22 a consequence of his actions, force could be used. At</p> <p>23 this moment he placed his hands in his pocket looking</p> <p>24 like he was trying to access something. I asked him to</p> <p>25 empty his pockets and remove his hands. He refused to</p> <p style="text-align: center;">Page 102</p>	<p>1 before any force was used and the detainee was still on</p> <p>2 the bed.</p> <p>3 Finally on this document, and then I will ask you</p> <p>4 about them, page 18, which is Mr Yates's account. Going</p> <p>5 about six lines down:</p> <p>6 "Myself and DCM Steve Dix agreed to enter the room</p> <p>7 and speak to Mr D1527 and ask him to walk with us to</p> <p>8 Eden wing as his behaviour was not acceptable. Before</p> <p>9 entering the room I asked DCO Bromley and DCO Mohammed</p> <p>10 Sheharyar Shaukat to remain outside of the room until</p> <p>11 otherwise advised."</p> <p>12 It says they entered the room. Mr Dix began talking</p> <p>13 to the detainee about what had happened: at this point,</p> <p>14 Mr D1527 said something along the lines of "Go and get</p> <p>15 your friends to get me. I am not going to go anywhere":</p> <p>16 "At this point Mr D1527 put his right hand into his</p> <p>17 pocket and looked to be reaching for something."</p> <p>18 It says Mr Dix asked what it was but he responded</p> <p>19 with:</p> <p>20 "'You will see what's in my pocket' and then he</p> <p>21 stood up with his fists clenched and started shouting.</p> <p>22 DCM Dix then grabbed hold of Mr D1527's right hand. At</p> <p>23 this point DCO Bromley and DCO Sheharyar Shaukat entered</p> <p>24 the room and began to restrain Mr D1527."</p> <p>25 It goes on to say:</p> <p style="text-align: center;">Page 104</p>

<p>1 "... DCM Dix [later] placed cuffs onto Mr D1527. We 2 released locks and held onto his arm and [we] began 3 moving him from the room but his level of aggression 4 escalated and DCO ... Shaukat took Mr D1527's head." 5 So again in this account, not written by you, 6 nothing about a phone, but something about something 7 being in the pocket and not knowing what it is. Again, 8 DCM Dix making first contact while you were outside the 9 room. It says that you entered the room after Mr Dix 10 had grabbed hold of D1527. 11 Just on the comment about DCO Shaukat taking his 12 head, so "took Mr D1527's head after he was in cuffs", 13 do you remember DCO Shaukat using force on his head 14 after he'd been cuffed or just from your account before? 15 A. I have no -- I have no knowledge. I can't remember back 16 then, to be honest. 17 Q. Did you know before the inquiry asked you about it that 18 these different accounts within the same single document 19 existed? 20 A. No, this is the first time I've seen other officers' 21 reports. We normally wouldn't share -- we wouldn't be 22 sharing reports. 23 Q. I see. So you don't see the completed use of force 24 document -- 25 A. No.</p> <p style="text-align: center;">Page 105</p>	<p>1 "They said I had to go to E wing and I said no." 2 It is said there was no negotiation and no 3 de-escalation: 4 "I had my phone in my hand. I think I may have said 5 something like I might swallow it." 6 Then he mentions you grabbing his arm and shoulder 7 and Michael Yates grabbing his other arm and shoulder. 8 If we go to page 28, he comments, at 79, at the 9 bottom, on the differences between the reports, and 10 says: 11 "I remember that DCO Ryan Bromley was the first 12 officer to use force on me. I understand that the 13 reports all say different things." 14 He says why he thinks you were the first one, 15 because he saw CCTV footage. Over the page, at the top: 16 "So as he was the first officer that rushes in the 17 room after Steve Dix and you can see him holding my arm 18 and shoulder, he was definitely the first officer who 19 used force on me." 20 Is there anything about that that jogs your memory 21 or that you think might be accurate compared to what you 22 wrote in your report? 23 A. There is nothing that jogs my memory. 24 Q. Might it be that you used force first and Mr Shaukat 25 took hold of Mr D1527's head after he was in handcuffs?</p> <p style="text-align: center;">Page 107</p>
<p>1 Q. -- you just see your part of it. Do you have any 2 explanation for why there might be two sets of accounts 3 that have two different versions of events? 4 A. Personally, no. I can only comment on my report and 5 I stand by my report. 6 Q. If, when you'd entered the room, Mr Dix already had hold 7 of D1527, you would have recorded that, would you? 8 A. That's correct. 9 Q. And your report says force was used at the point he 10 reached for the phone a second time. If, in fact, force 11 had been used because he was reaching for, possibly, an 12 unidentified weapon, you didn't know what it was, you 13 would have recorded that, would you? 14 A. I would have recorded that. 15 Q. Finally, we have D1527's own account. If we can see 16 that on the screen, please, it is <DL000144>, page 27 17 only. This is from the detainee's statement. At 75, he 18 discusses it. He says, while he was in another 19 detainee's room, a lot of officers came in. He recalls 20 that it was DCM Steve Dix and Michael Yates who told him 21 he had to go to E wing: 22 "After a while, Steve Dix asked for other officers 23 to come in, who I understand to be Ryan Bromley, 24 Mohammed Shaukat and Ben Wright." 25 He knows the names after seeing footage:</p> <p style="text-align: center;">Page 106</p>	<p>1 A. I have no knowledge of that incident. I can only go by 2 my report, I believe. 3 Q. You said at 104 of your own statement, so I'm back to 4 page 25 of your statement, you comment on the detainee 5 and say he was notorious for self-harming? 6 A. Correct. 7 Q. Did you know about his mental health before you were 8 involved in this incident? 9 A. Unfortunately, I'm not a doctor. I wouldn't -- I didn't 10 know any details. He might have been on an ACDT 11 previously. But he was on Dove wing for a period of 12 time. 13 Q. You mention he was on Dove wing, as in he wasn't always 14 on E wing. Is that what you're saying? 15 A. I don't know. 16 Q. You say you're not a doctor. Just help us with what 17 kind of training, if any, you had in dealing with people 18 who had mental health issues? 19 A. You do a bit of training through the ITC. 20 Q. What sort of stuff? 21 A. Classroom based, so theory. 22 Q. About people with mental health problems? 23 A. Yes. 24 Q. Did you feel like that was enough to help you deal with 25 the variety of people with mental health issues that you</p> <p style="text-align: center;">Page 108</p>

27 (Pages 105 to 108)

<p>1 came across?</p> <p>2 A. No.</p> <p>3 Q. Why not?</p> <p>4 A. That's why people would go to school, to do a degree in</p> <p>5 that sort of field.</p> <p>6 Q. Is it something you think would have helped you if you'd</p> <p>7 have known a bit more?</p> <p>8 A. Yes.</p> <p>9 Q. Were you, in general, aware of detained people in mental</p> <p>10 distress or, as you say, with this detainee, high risks</p> <p>11 of self-harm being moved to E wing under rule 40s?</p> <p>12 A. Sorry, can you ask that question again?</p> <p>13 Q. Were you aware of a process or that it was common for</p> <p>14 people who were at risk of self-harm being moved to</p> <p>15 E wing under a rule 40, rather than just moved there?</p> <p>16 A. Quite possibly, because, on Eden wing, you had constant</p> <p>17 supervision rooms.</p> <p>18 Q. They're the ones with the big pane in the window?</p> <p>19 A. That's correct.</p> <p>20 Q. I'm going to ask now about another use of force</p> <p>21 incident. This is one that involved D390 on</p> <p>22 5 June 2017. You discuss this from page 28 onwards of</p> <p>23 your statement, paragraph 116 onwards. Your account of</p> <p>24 this is -- this is an incident -- sorry, to jog your</p> <p>25 memory, 5 June 2017. A planned control and restraint to</p> <p style="text-align: center;">Page 109</p>	<p>1 happened and it must be completely independent of other</p> <p>2 staff involved in the incident. So you know all this</p> <p>3 from your training and your practice. Your account is</p> <p>4 on the next page, starting at page 21. If we look at</p> <p>5 the sort of big paragraph there that starts with "At</p> <p>6 approximately". You say you made your way down from the</p> <p>7 staff room where the brief was being held to the</p> <p>8 location of the detainee's room which was on A wing:</p> <p>9 "Once the team arrived at the door of A wing</p> <p>10 room 209, DCM Povey had begun to give D390 instructions</p> <p>11 through the closed door and immediately noticed D390</p> <p>12 repeatedly boiling his kettle in the room with the room</p> <p>13 floor already gathering a puddle. D390 continued to</p> <p>14 ignore instructions given but moved to face the door of</p> <p>15 the room. Immediately the team were instructed to</p> <p>16 advance into A wing room 209, with myself and</p> <p>17 DCO Shadbolt closely following DCO Sayers in. Upon</p> <p>18 entering, detainee 390 continued to ignore instructions</p> <p>19 from DCO Sayers. For the safety of the team, DCO Sayers</p> <p>20 advanced, placing the shield onto D390's chest placing</p> <p>21 him onto the bed on the room's left side."</p> <p>22 Then you say you took control of his arm and then he</p> <p>23 was more compliant and walked out. So you say that, at</p> <p>24 the time, D390 was repeatedly boiling a kettle. Do you</p> <p>25 remember if Mr Povey-Meier would have told you that or</p> <p style="text-align: center;">Page 111</p>
<p>1 remove D390 from his room in order to take him to</p> <p>2 a waiting escort. He had a roommate, D1851, who was in</p> <p>3 the room with him as well. Your account of this in</p> <p>4 summary was that DCM Povey-Meiers was the DCM running</p> <p>5 the use of force. You say in your statement, at 116,</p> <p>6 about halfway down:</p> <p>7 "If the detainee refuses, the DCM will use verbal</p> <p>8 communication to reason with the detainee to encourage</p> <p>9 them to be compliant. I do not recall being in the room</p> <p>10 at this time so I couldn't provide further comment on</p> <p>11 exactly what was said by DCM Povey."</p> <p>12 Then you were asked to address this in your</p> <p>13 statement and to mention the report that you made at the</p> <p>14 time. We will have a look at that written report on the</p> <p>15 screen, if we can. It is <CJS005624>. It is at tab 10</p> <p>16 as well of the chair's bundle. That's the front page.</p> <p>17 If we go to page 2, your name is on there. Your account</p> <p>18 starts at page 20. So if we could have that on the</p> <p>19 screen. These are the things -- some of it has been</p> <p>20 filled in by you and some of it is what's written on</p> <p>21 every form. So, for example, use of force must only be</p> <p>22 used when it is reasonable in the circumstances, an</p> <p>23 absolute necessity. No more force than necessary and</p> <p>24 proportionate to the seriousness of the situation. It</p> <p>25 says there that your statement must set out what</p> <p style="text-align: center;">Page 110</p>	<p>1 whether you saw it yourself?</p> <p>2 A. We would have been positioned to the side of the door</p> <p>3 while the manager was giving directions and trying to</p> <p>4 de-escalate him through the viewing panel on the door.</p> <p>5 So we wouldn't have actually seen in the room. We can</p> <p>6 only go off what was being fed back to us.</p> <p>7 Q. So it's a normal room on A wing rather than one of</p> <p>8 the big rooms with the viewing panel you mentioned?</p> <p>9 A. Correct.</p> <p>10 Q. So it has a small viewing panel. You say D390 continued</p> <p>11 to ignore instructions. This is before you have entered</p> <p>12 the room. So these weren't instructions you were giving</p> <p>13 to him?</p> <p>14 A. No, so the manager leading it would always use his</p> <p>15 de-escalation skills as use of force is always a last</p> <p>16 resort.</p> <p>17 Q. Then you say he moved to face the door of the room.</p> <p>18 Again, as you say, you wouldn't have been able to see in</p> <p>19 the room at this point, but you would have --</p> <p>20 A. We would have been looking at the manager.</p> <p>21 Q. The manager would have told you. You say the team were</p> <p>22 given instructions to advance. According to your note,</p> <p>23 it was you and DCO Shadbolt following DCO Sayers in, so</p> <p>24 DCO Sayers first and you two behind him. Then, as</p> <p>25 I have read:</p> <p style="text-align: center;">Page 112</p>

28 (Pages 109 to 112)

<p>1 "Upon entering, D390 continued to ignore 2 instructions from DCO Sayers. For the safety of 3 the team, DCO Sayers advanced, placing the shield into 4 his chest." 5 So, on entering, further instructions from 6 DCO Sayers which D390 ignored. 7 A. Yes, as a team, we entered the room. 8 Q. And D390 continued to ignore instructions from 9 DCO Sayers? 10 A. From what I -- from my knowledge. Although he wasn't 11 physically fighting us, he was non-compliant. 12 Q. So you said in your report that he was ignoring 13 instructions from DCO Sayers? 14 A. That's non-compliant, yes. 15 Q. We can go to DCO Sayers' account as well at page 26. It 16 is by him, but he also refers to himself as DCO Sayers. 17 The sixth line from the bottom: 18 "The team led by DCO Sayers on the shield and DCO 19 Shadbolt and Bromley as arm officers entered the room. 20 D390 continued to stand at the far end of the room next 21 to the desk and kettle. D390 didn't listen to me asking 22 him to sit on the bed as I entered the room. I feared 23 that myself and the team could be covered in boiling 24 water. I advanced with the team and placed the shield 25 onto the chest of D390, placing him onto the bed on the</p> <p style="text-align: center;">Page 113</p>	<p>1 speak with either of the men in the room before using 2 force, is there? 3 A. No. 4 Q. Not by DCM Povey-Meier or not by DCO Sayers? 5 A. No. The team were told to advance. 6 Q. So it's literally two or three seconds before the door 7 opening and D390 being pushed onto the bed with shields? 8 A. That's correct, because there's a kettle getting boiled 9 in the room. 10 Q. Do you now accept, having seen this, that DCO Sayers did 11 not give an opportunity to D390 to sit on the bed before 12 using force? 13 A. Obviously it's a long time ago, so I have no memory on 14 that, but if a detainee is boiling the kettle, 15 threatening officers with it, then I don't think that 16 would -- talking to them, they, I think, are past that. 17 Q. You said in your account: 18 "Upon entering, detainee 390 continued to ignore 19 instructions from DCO Sayers and for the safety of 20 the team DCO Sayers advanced." 21 There wasn't a period where he was ignoring 22 instructions, was there? It was immediate? 23 A. He was ignoring Stuart Povey. 24 Q. But he wasn't ignoring instructions from DCO Sayers? 25 A. That's correct.</p> <p style="text-align: center;">Page 115</p>
<p>1 right-hand side of the room." 2 So a similar account. DCO Sayers says the 3 instruction was to ask him to sit on the bed, which he 4 ignored, advanced and placed the shield onto his chest 5 and placed him onto the bed. So using the same phrase 6 as you, placing the shield onto his chest. I want to 7 show the footage of this now. We have to show it, 8 unfortunately, in closed session, but it is less than 9 two minutes long. If we can go into closed session and 10 can I have confirmation of when that's been done. The 11 footage is UOF 137.17 (2). Play it from the start, 12 please. 13 IN CLOSED SESSION 14 MS MOORE: Can we show the footage, then, please? 15 (Video played) 16 MS MOORE: If that comes off the screen, we can go back into 17 open session, please. 18 IN OPEN SESSION 19 MS MOORE: As we can see there, and as you mentioned, you 20 couldn't see into the room yourself before you entered, 21 only Mr Povey-Meier can see through there. He only 22 gives instructions to D390's roommate, doesn't he? 23 That's the only person he's speaking to. 24 A. I have no knowledge on that. 25 Q. Once the door is opened, there is no further attempt to</p> <p style="text-align: center;">Page 114</p>	<p>1 Q. How did you come to write in your report that he was 2 ignoring instructions from DCO Sayers? 3 A. I think because normally -- well, when you're the number 4 one officer, you are the voice, so there is only one 5 voice not to confuse the detainee. So he would be 6 giving instructions, and, once the locks have been 7 applied, it would be his voice trying to get the 8 detainee to relax, try to comply with us. 9 Q. So you're saying that Mr Povey-Meier did the 10 de-escalation outside the room? 11 A. Stuart Povey, as you can see on the footage, he was 12 doing the de-escalation from the door to try and get 13 this detainee to come to the door compliantly, which the 14 detainee refused to, and carried on boiling the kettle. 15 Q. If we can have <CJS005624> back up on the screen, 16 please, and page 21, and, again, that paragraph "At 17 approximately 17:00". Where you said: 18 "... immediately the team were instructed to advance 19 into A wing, room 209, with myself and DCO Shadbolt 20 closely following DCO Sayers. Upon entering, D390 21 continued to ignore instructions from DCO Sayers." 22 You accept now that he didn't ignore instructions 23 from DCO Sayers; there were no further instructions from 24 DCO Sayers, in fact? 25 A. DCO Sayers would have continued to do instructions</p> <p style="text-align: center;">Page 116</p>

<p>1 during the whole of the incident.</p> <p>2 Q. Was there a period when he was giving instructions and</p> <p>3 D390 ignored him before the shield was applied?</p> <p>4 A. I have no knowledge. It is a long time ago, to be</p> <p>5 honest.</p> <p>6 Q. Well, you just watched the footage a couple of seconds</p> <p>7 ago.</p> <p>8 A. Yes.</p> <p>9 Q. They immediately enter the room, don't they, and the</p> <p>10 shield is almost immediately applied to the detainee?</p> <p>11 A. Because there was a boiling kettle in the room.</p> <p>12 Q. I'm not asking for why it was; I'm just asking about</p> <p>13 what you saw on the footage?</p> <p>14 A. I've seen it on the footage, yes.</p> <p>15 Q. Can you help us with why you might have said in your</p> <p>16 report that D390 ignored instruction?</p> <p>17 A. No. I must have just been going off what</p> <p>18 Stuart Povey~...</p> <p>19 Q. Did you discuss what to write with DCO Sayers?</p> <p>20 A. No.</p> <p>21 Q. The action that we saw in that piece of footage, where</p> <p>22 DCO Sayers uses his shield on D390, you and DCO Sayers</p> <p>23 both describe as "placing" a shield onto him. Now that</p> <p>24 you've watched it again, can you think of a better word</p> <p>25 to use, or do you stand by the word "placing"?</p> <p style="text-align: center;">Page 117</p>	<p>1 the shield" was a correct term.</p> <p>2 Q. You should have seen the report by the inquiry's use of</p> <p>3 force expert, Mr Collier, but I will read out what he</p> <p>4 says about this event anyway. Chair, this is from his</p> <p>5 first report, <INQ000111>. We don't need it on the</p> <p>6 screen, thank you. It is paragraph 249. He says:</p> <p>7 "Once at the door, there was no clear conversation</p> <p>8 between DCM Povey-Meier and D390. Instead, he tries to</p> <p>9 persuade the second detainee to come to the door and</p> <p>10 follow the staff. He should have followed this with a</p> <p>11 further and last opportunity to for D390 to walk from</p> <p>12 the room. No effort was made to open the room door and</p> <p>13 give D390 a chance to speak with DCM Povey-Meier face to</p> <p>14 face. Instead, he opened the door and sent the team in.</p> <p>15 They immediately pin D390 and then remove the shield.</p> <p>16 The events that follow show D390 to be calm and</p> <p>17 explaining his reasons for not complying with the</p> <p>18 removal order."</p> <p>19 Then he concludes at 260/261:</p> <p>20 "All reasonable efforts had not been made for D390</p> <p>21 to comply ... force was not used as the last resort.</p> <p>22 "...</p> <p>23 "... [but] initial use of a shield was more than</p> <p>24 necessary as communication should have taken place</p> <p>25 first."</p> <p style="text-align: center;">Page 119</p>
<p>1 A. I stand by the word.</p> <p>2 Q. You wouldn't use a word like "pinning him down" with</p> <p>3 a shield?</p> <p>4 A. No.</p> <p>5 Q. Can we take it, then, in all the reports that we have</p> <p>6 seen from you where you've said a detainee has been</p> <p>7 given an opportunity to comply or has ignored</p> <p>8 instructions, you might be mistaken about that</p> <p>9 sometimes?</p> <p>10 A. No, during the course of any C&R, de-escalation tactics</p> <p>11 are always used to try and de-escalate the detainee if</p> <p>12 he's in an aggressive manner.</p> <p>13 Q. But sometimes the ignoring instructions might be before</p> <p>14 you enter the room, for example, but you might</p> <p>15 accidentally write that it was after?</p> <p>16 A. Could be human error.</p> <p>17 Q. In all reports where you use a word like "placed" to</p> <p>18 talk about placing a shield, you could be talking about</p> <p>19 force of the level that we saw on the footage?</p> <p>20 A. Pardon?</p> <p>21 Q. Where you have used words like "placed", placing</p> <p>22 a shield, we can imagine that to mean it might be force</p> <p>23 like you've seen on the footage? So you might use</p> <p>24 "placed" to describe that sort of level of force?</p> <p>25 A. I can only go off that report, and I stand by "placing</p> <p style="text-align: center;">Page 118</p>	<p>1 Do you agree with that?</p> <p>2 A. I mean, Jon Collier is the expert. I've never done</p> <p>3 a manager's job where I'm doing the de-escalation</p> <p>4 through the door. I was just doing my job as the arm</p> <p>5 officer on that scenario.</p> <p>6 MS MOORE: Chair, it is 1.00 o'clock now. I have some more</p> <p>7 questions for Mr Bromley. Rather than put off</p> <p>8 everyone's lunch until that's done, I suggest we have</p> <p>9 a break now for lunch and call him back at 2.00 o'clock.</p> <p>10 Unfortunately, this means you won't be able to speak</p> <p>11 to anyone about your evidence over the break, but it is</p> <p>12 just an hour for lunch and then we can return and carry</p> <p>13 on.</p> <p>14 Thank you, chair, 2 o'clock.</p> <p>15 THE CHAIR: Thank you very much.</p> <p>16 (1.00 pm)</p> <p>17 (The short adjournment)</p> <p>18 (2.00 pm)</p> <p>19 MS MOORE: Thank you, chair. We continue with the evidence</p> <p>20 of Mr Bromley.</p> <p>21 Mr Bromley, just before lunch, you were helping us</p> <p>22 with your recollection of an incident on 5 June 2017.</p> <p>23 I now want to ask you about something that happened the</p> <p>24 next day, 6 June, which is a totally unrelated account</p> <p>25 of a different use of force, but it just happened to be</p> <p style="text-align: center;">Page 120</p>

<p>1 the day after, which possibly illustrates what you say</p> <p>2 about lots of use of force events and you being involved</p> <p>3 in them.</p> <p>4 If you turn to page 30 of your statement, the topic</p> <p>5 I want to ask you about is covered in your statement at</p> <p>6 paragraphs 123 to 125. You briefly address this</p> <p>7 incident which involved a detainee called D1538, and it</p> <p>8 took place in the arts and crafts room. Have you got it</p> <p>9 there?</p> <p>10 A. Yes.</p> <p>11 Q. Your account, as you set out here at 123, is that, from</p> <p>12 memory, the first response went off, so you get told you</p> <p>13 need to go to the particular room. You went to the room</p> <p>14 the incident was in and you remember seeing D1538, you</p> <p>15 say, looking extremely aggressive because of his body</p> <p>16 language and expressions. Later, the situation was</p> <p>17 de-escalated and you later learned that he had been</p> <p>18 attacked by another detainee, I think, but you say you</p> <p>19 didn't know that at the time when you entered the room?</p> <p>20 A. That's right.</p> <p>21 Q. Mr Tulley's recollection about this, which we will come</p> <p>22 to, is that you told him that DCM Farrell, who was also</p> <p>23 involved, nearly took D1538's head off, and you say in</p> <p>24 your statement that that must be a mistake. If we go</p> <p>25 back to the footage, which we have now provided to you</p> <p style="text-align: center;">Page 121</p>	<p>1 "He was also holding a pencil in his left hand</p> <p>2 acting out a stabbing motion. Immediately</p> <p>3 DCM Nick London took control of D1538's left arm in</p> <p>4 a guided hold with the pencil dropping to the floor.</p> <p>5 D1538 continued to shout abuse so I then applied</p> <p>6 a guided hold to D1538's right arm. At this point, for</p> <p>7 the safety of the detainee, DCM Shane Farrell acted as</p> <p>8 head [officer] to protect the detainee from throwing his</p> <p>9 head back and forth."</p> <p>10 Then you go on to say he'd calmed down. Having seen</p> <p>11 that footage again, do you still believe that</p> <p>12 DCM Farrell took hold of D1538's head for his own</p> <p>13 safety?</p> <p>14 A. 100 per cent.</p> <p>15 Q. Mr Farrell, in his own report, says that he took control</p> <p>16 of the head so it didn't hit on a cabinet and to protect</p> <p>17 you and Mr London. Did you believe there was a risk of</p> <p>18 his head hitting a cabinet?</p> <p>19 A. That's correct, because, as you can see with the</p> <p>20 footage, there is a cabinet directly behind his head.</p> <p>21 Q. Did you have any concerns at the time about this</p> <p>22 incident, particularly Mr Farrell's use of force on the</p> <p>23 detainee's head?</p> <p>24 A. No, I personally thought it was textbook.</p> <p>25 Q. It was ...?</p> <p style="text-align: center;">Page 123</p>
<p>1 and we can show in open session, can we have a look,</p> <p>2 it's a very short clip, KENCOV1031-V2017060600011. If</p> <p>3 you play it from the very beginning, please. I will ask</p> <p>4 you to pause it shortly into the footage. Thank you.</p> <p>5 (Video played)</p> <p>6 MS MOORE: Can you pause it there? It is quite blurry.</p> <p>7 I think that's you at the back and Nick London on the</p> <p>8 other arm. Is that your recollection?</p> <p>9 A. Yes.</p> <p>10 Q. If you start again -- there is a man who is about to</p> <p>11 enter the shot from the left-hand side and that is going</p> <p>12 to be Shane Farrell. So if we keep an eye out for him</p> <p>13 and restart the footage, please.</p> <p>14 (Video played)</p> <p>15 MS MOORE: So we saw Shane Farrell was the one who came in</p> <p>16 from the left with the white shirt and the other</p> <p>17 gentleman in the white shirt, I believe, was Mr Dix,</p> <p>18 possibly. In any event, it's Shane Farrell who made</p> <p>19 contact with the detainee's head. Can we have a look at</p> <p>20 your use of force report, which is <CJS005615>, please,</p> <p>21 page 14. This is the start of yours. We see your name</p> <p>22 there and, again, it is done on the day. Going on to</p> <p>23 the next page, you mention that you are acting as first</p> <p>24 response. The first response call came out, and about</p> <p>25 halfway down that paragraph:</p> <p style="text-align: center;">Page 122</p>	<p>1 A. Textbook.</p> <p>2 Q. Textbook. You discuss the incident with Callum Tulley.</p> <p>3 We have a transcript and video of that. I know you said</p> <p>4 in your statement that you have no recollection of this</p> <p>5 and that Mr Tulley might have misremembered it, but you</p> <p>6 have now been shown or had a chance to see the footage,</p> <p>7 I believe?</p> <p>8 A. That's correct.</p> <p>9 Q. Do you now accept that the conversation happened?</p> <p>10 A. I do accept that was me.</p> <p>11 Q. Can I just put the transcript up on screen. We don't</p> <p>12 need to show the footage. It's <TRN0000091> page 6,</p> <p>13 please. This is from the same -- sorry, from a few days</p> <p>14 later, four days later. There's a conversation, Callum</p> <p>15 starts:</p> <p>16 "That guy in [something]. Well; it wasn't really</p> <p>17 a restraint ..."</p> <p>18 You say: "Yeah."</p> <p>19 Callum says:</p> <p>20 "... class room. Did you see Shane [something]?"</p> <p>21 You say:</p> <p>22 "He took his head clean off."</p> <p>23 Callum says:</p> <p>24 "Ahh.</p> <p>25 "I know, mate, I know."</p> <p style="text-align: center;">Page 124</p>

<p>1 Then you again:</p> <p>2 "Yeah, yeah, no worries ... I hate -- I hate being</p> <p>3 [inaudible] stuff like that."</p> <p>4 To me, it sounded like you said "head officer" on</p> <p>5 the video. I don't know if, when you watched the</p> <p>6 footage, you thought you might have said "head officer"?</p> <p>7 A. Possibly.</p> <p>8 Q. Callum said:</p> <p>9 "Because I only really clo -- I only really clocked</p> <p>10 it."</p> <p>11 You say:</p> <p>12 "... And they pulled him -- pulled his neck right</p> <p>13 down. That's why even D197's mates were like</p> <p>14 [something], but they're the ones that fight him. Do</p> <p>15 you know what I mean?"</p> <p>16 Callum says: "Yeah", and then there's more</p> <p>17 conversation.</p> <p>18 So this conversation with Callum Tulley suggests,</p> <p>19 doesn't it, that, at the time, you thought that</p> <p>20 Mr Farrell had gone too far because you say "He took his</p> <p>21 head clean off"?</p> <p>22 A. No, I still stand by my report. And if there was any</p> <p>23 concerns, I would have reported it immediately.</p> <p>24 Q. Do you remember why you said to Callum Tulley that</p> <p>25 Mr Farrell "took his head clean off"?</p> <p style="text-align: center;">Page 125</p>	<p>1 officers are on the arms. Is the head officer on the</p> <p>2 head?</p> <p>3 A. Yes, he's head officer.</p> <p>4 Q. Can we go to <TRN0000089>, please, page 26. Another</p> <p>5 conversation with Callum:</p> <p>6 "Ryan, what happened up there in the [something]?</p> <p>7 I missed the start of that."</p> <p>8 So this is the day -- so we can see the day at the</p> <p>9 top and this is the same day of the incident rather than</p> <p>10 later like the one we just looked at. You say:</p> <p>11 "[Something] I don't know what he was arguing over</p> <p>12 [inaudible]. When we got there, the kiddy was kicking</p> <p>13 off, trying to get back at him [inaudible] and he just</p> <p>14 put the guy -- grabs hold of the guy, that was it."</p> <p>15 I think that's talking about the detained person.</p> <p>16 Callum says:</p> <p>17 "I saw Shane put his head down."</p> <p>18 You say:</p> <p>19 "I don't know. But the thing was it was in front of</p> <p>20 everyone."</p> <p>21 Do you remember this conversation?</p> <p>22 A. I don't remember this conversation, but obviously seeing</p> <p>23 it there, it seems to be my name on the transcript.</p> <p>24 Q. Do you know what you might have meant by "it was in</p> <p>25 front of everyone"?</p> <p style="text-align: center;">Page 127</p>
<p>1 A. I have no idea why I said that to Callum Tulley.</p> <p>2 Q. And you say "He pulled his neck right down". That's</p> <p>3 something that can --</p> <p>4 A. I have no idea. I have no knowledge of that incident</p> <p>5 and this conversation between me and Callum.</p> <p>6 Q. You don't remember it happening?</p> <p>7 A. No.</p> <p>8 Q. You can't think why you would have described it as "head</p> <p>9 clean off" or "pulling his neck right down"?</p> <p>10 A. No. Like I said, I thought it was textbook.</p> <p>11 Q. If you did say, and I appreciate that it says</p> <p>12 "[inaudible]" here, that you hated being head officer</p> <p>13 for stuff like that, is that something you can comment</p> <p>14 on? Do you remember being --</p> <p>15 A. It doesn't actually say that about me being head</p> <p>16 officer, but, I mean, I'm confident in every role of use</p> <p>17 of force, whether it be an arm officer, a head officer,</p> <p>18 an anchor, a cuff officer. I'm confident in all</p> <p>19 aspects.</p> <p>20 Q. Just so we are clear, "head officer" doesn't mean in</p> <p>21 charge, it means literally the person who has control of</p> <p>22 the head?</p> <p>23 A. It's classed as number one officer. Yeah, so number one</p> <p>24 officer would be the head.</p> <p>25 Q. But it also means the head physically, the head? So arm</p> <p style="text-align: center;">Page 126</p>	<p>1 A. Yeah, as you can see with the footage, it is not an</p> <p>2 empty classroom.</p> <p>3 Q. At the bottom, so lines 921 to 923, you say:</p> <p>4 "Well, the thing is it was like halfway through my</p> <p>5 fourth [something] day and I was first response.</p> <p>6 I shouldn't have [something] to be fair, but you've got</p> <p>7 to, ain't you?"</p> <p>8 Are you talking about that you'd worked four days in</p> <p>9 a row?</p> <p>10 A. Yeah, looks like it.</p> <p>11 Q. Is this something that -- you didn't think you should be</p> <p>12 first response if you had been working four days in</p> <p>13 a row?</p> <p>14 A. I don't know. It isn't clear with that transcript.</p> <p>15 Q. Was it ever the case that you'd worked four days in</p> <p>16 a row and you thought, I'm too tired or I've been</p> <p>17 working too many days without a break to be use of</p> <p>18 force?</p> <p>19 A. No, I was always good at my job. I was always confident</p> <p>20 with it. And if I had any concerns, I would have taken</p> <p>21 time away from the building.</p> <p>22 Q. So you say that, if you had had concerns about</p> <p>23 Mr Farrell acting with excessive force, you would have</p> <p>24 reported this?</p> <p>25 A. Definitely.</p> <p style="text-align: center;">Page 128</p>

<p>1 Q. Who would you have reported it to?</p> <p>2 A. I would have SRed it. I would have gone -- spoken with</p> <p>3 a senior manager and discussed my concerns about it.</p> <p>4 Q. You say that, despite the conversation that you have now</p> <p>5 accepted happened with Callum, where you say "He took</p> <p>6 his head clean off", "He pulled his neck right down",</p> <p>7 this wasn't an occasion where you felt you needed to</p> <p>8 report?</p> <p>9 A. No. As I said, it was textbook.</p> <p>10 Q. Turning, then, to another use of force incident,</p> <p>11 however, this is a reported assault on you by</p> <p>12 a detainee, rather than any use of force against</p> <p>13 a detainee primarily. This is one that took place on</p> <p>14 14 April 2017, so right at the start of the relevant</p> <p>15 period that we are looking at. You deal with this,</p> <p>16 Mr Bromley, at pages 40 to 41 of your statement,</p> <p>17 paragraph 163 to 168. We have shown you a document.</p> <p>18 I don't need to bring it up on screen. Do you recall</p> <p>19 this event when you were monitoring detainees who were</p> <p>20 on the courtyard protesting?</p> <p>21 A. I vaguely remember it, yes.</p> <p>22 Q. I think you say in your statement you were inside</p> <p>23 because you were told it wasn't safe to be outside with</p> <p>24 them?</p> <p>25 A. I vaguely remember that. Obviously it is a long time</p> <p style="text-align: center;">Page 129</p>	<p>1 A. Yes.</p> <p>2 Q. "A detainee then punched me on the back of my head"?</p> <p>3 A. That's correct.</p> <p>4 Q. And you pushed him away?</p> <p>5 A. That's correct.</p> <p>6 Q. The next thing you say you recall is DCO Shadbolt was on</p> <p>7 one side of you and DCO Sayers on the other side and you</p> <p>8 call it marshalling. So they sort of protected you to</p> <p>9 go back inside?</p> <p>10 A. Yes.</p> <p>11 Q. After this had happened, were you injured, did you have</p> <p>12 a headache or any bruising?</p> <p>13 A. At the time, I had no bruising, but I was concussed.</p> <p>14 Q. Mmm.</p> <p>15 A. I was definitely concussed.</p> <p>16 Q. Were you taken off duty after this?</p> <p>17 A. I have no memory of that. I can't remember what</p> <p>18 happened after that courtyard incident.</p> <p>19 Q. Do you remember if you were offered any support by any</p> <p>20 of the staff?</p> <p>21 A. I can't remember.</p> <p>22 Q. You do recall, because you say in your statement, at</p> <p>23 167, that you were, the following day, asked to go to</p> <p>24 CSU and shake the detainee's hand and you say "to</p> <p>25 mediate the matter so that he could be released back</p> <p style="text-align: center;">Page 131</p>
<p>1 ago, so I don't have a fresh memory on it.</p> <p>2 Q. Do you happen to recall what the protest was about?</p> <p>3 A. No.</p> <p>4 Q. Do you remember other protests around this time?</p> <p>5 A. No.</p> <p>6 Q. Do you remember any protests at Brook House?</p> <p>7 A. Not from my -- not while I was on shift.</p> <p>8 Q. Turning back to this incident in particular, which you</p> <p>9 do seem to remember because you set it out in your</p> <p>10 statement, you said that you saw a detainee go to the</p> <p>11 floor and have what you suspected, I think, to be an</p> <p>12 epileptic fit?</p> <p>13 A. Correct.</p> <p>14 Q. What happened next?</p> <p>15 A. Obviously, as officers, we have got a duty of care, so</p> <p>16 the decision was made to enter the courtyard and try and</p> <p>17 clear the surrounding area so we could check the</p> <p>18 detainee's welfare.</p> <p>19 Q. You say that detainees told you to let the other</p> <p>20 detainee, who had gone to the ground, die?</p> <p>21 A. That's correct.</p> <p>22 Q. Obviously you didn't do so. You went to him?</p> <p>23 A. Yeah, we went straight to him, dispersed the crowd as</p> <p>24 much as we could, but that still didn't stop it.</p> <p>25 Q. You said "They were calling me a criminal"?</p> <p style="text-align: center;">Page 130</p>	<p>1 onto D wing"?</p> <p>2 A. That's correct.</p> <p>3 Q. Do you remember who asked you to shake his hand?</p> <p>4 A. No.</p> <p>5 Q. How did you feel about that request?</p> <p>6 A. Part of the job. I was just doing my job as a duty of</p> <p>7 care to see another resident that was in a vulnerable</p> <p>8 state. I suppose these things can happen in the</p> <p>9 security industry.</p> <p>10 Q. Do you remember if you did go and shake his hand?</p> <p>11 A. Yes, I did shake his hand.</p> <p>12 Q. The police were informed of the incident?</p> <p>13 A. That's correct.</p> <p>14 Q. And you had a meeting with the police about it?</p> <p>15 A. Yes.</p> <p>16 Q. Do you remember who informed the police?</p> <p>17 A. No. I would have thought it would have been the</p> <p>18 security department or someone higher up.</p> <p>19 Q. It wasn't that you called the police after it happened?</p> <p>20 A. No.</p> <p>21 Q. It goes through the channels?</p> <p>22 A. That's correct.</p> <p>23 Q. We have a document which I don't need to show on the</p> <p>24 screen, but, for reference, it's <SXP000102> from</p> <p>25 Sussex Police, which says "Victim declined to support".</p> <p style="text-align: center;">Page 132</p>

<p>1 We assume that means declined to support further action</p> <p>2 or declined to support prosecution. Obviously you're</p> <p>3 the victim in this reference. Meaning that no action</p> <p>4 was taken then by the police?</p> <p>5 A. Correct.</p> <p>6 Q. You say that's not right. You hadn't said that you</p> <p>7 wouldn't support the action?</p> <p>8 A. It wasn't I hadn't supported the action. I was just</p> <p>9 informed by the police that these sort of cases, when an</p> <p>10 individual's maybe awaiting flight details, their case</p> <p>11 is pending, my complaint wouldn't have been dealt with.</p> <p>12 Q. Why wouldn't it have been dealt with?</p> <p>13 A. I don't know. I'm not a police officer, unfortunately.</p> <p>14 Q. You say in your statement:</p> <p>15 "I was informed that if I did press any charges it</p> <p>16 would not be pursued because it would interfere with</p> <p>17 potential immigration removal directions for D1103."</p> <p>18 A. That's what I just said.</p> <p>19 Q. One of the police officers, rather than someone at G4S,</p> <p>20 told you --</p> <p>21 A. Correct.</p> <p>22 Q. Had you heard of this happening before? Is this</p> <p>23 something that -- is this the only time you'd come</p> <p>24 across it?</p> <p>25 A. I can't speak for any other cases, but assaults on staff</p> <p style="text-align: center;">Page 133</p>	<p>1 these events, which is at <CJS005955> -- we don't need</p> <p>2 that on screen -- DCO Sayers said during the interview</p> <p>3 that he did make the comments but he couldn't recall who</p> <p>4 the comments were made to and he wasn't sure whether or</p> <p>5 not it was you. We will go to the transcript, please,</p> <p>6 and see those comments. <TRN0000093> and page 31,</p> <p>7 please. It starts with a comment from Callum Tulley:</p> <p>8 "Hear you've made a new friend, Sean."</p> <p>9 And then somebody says, male officer 1:</p> <p>10 "Who have you fallen out with?</p> <p>11 "[Putting on an accent]. Alright governor?"</p> <p>12 Then there's some further discussion at 1112</p> <p>13 Callum Tulley says:</p> <p>14 "Do you know about the um, do you know about the</p> <p>15 threats he's made against you?</p> <p>16 "Sean Sayers: Threats against me?"</p> <p>17 "Callum Tulley: Dan Lake said you already know, so</p> <p>18 I haven't SR'd anything yet, but I'm in the library next</p> <p>19 so I can write an SR.</p> <p>20 "Sean Sayers: When? Was he doing it when I wasn't</p> <p>21 there?</p> <p>22 "Callum Tulley: When I went up to the wing he was</p> <p>23 saying, he was basically saying you've made the biggest</p> <p>24 mistake of your life and all that stuff, blah, blah,</p> <p>25 blah. 'You don't know who I am'."</p> <p style="text-align: center;">Page 135</p>
<p>1 were a regular occurrence.</p> <p>2 Q. Were what, sorry?</p> <p>3 A. A regular occurrence.</p> <p>4 Q. Had there been occasions where the police had said to</p> <p>5 you or colleagues that you'd spoken to --</p> <p>6 A. I don't know. I haven't spoken to any other colleagues</p> <p>7 regarding this issue.</p> <p>8 Q. Then you say he was placed back onto D wing where you</p> <p>9 were placed and it was fortunate that he was fine with</p> <p>10 you after this incident?</p> <p>11 A. Correct.</p> <p>12 Q. The last thing I want to ask you about is a conversation</p> <p>13 on 15 June 2017. So this is the day of an incident</p> <p>14 which involved DCO Sayers and D313. You were asked</p> <p>15 about this in a G4S investigation following the BBC</p> <p>16 raising allegations about Mr Sayers. The allegation</p> <p>17 that's made about Mr Sayers was that, on 15 June, he</p> <p>18 struck D313 with the back of his hand after physically</p> <p>19 lifting him in his room. I should stress, you were not</p> <p>20 alleged to have been involved in that alleged assault on</p> <p>21 D313. The allegation that was made against you was</p> <p>22 that, in a later conversation, you'd asked Mr Sayers if</p> <p>23 he had a good team and he said, "No, that's why I did it</p> <p>24 on my own", and then in front of you he described the</p> <p>25 assault. As we know from the G4S investigation into</p> <p style="text-align: center;">Page 134</p>	<p>1 Sean Sayers said:</p> <p>2 "Did that years ago when I got my misses</p> <p>3 [something]."</p> <p>4 Callum says:</p> <p>5 "I think he's saying to Nobby that he's going to</p> <p>6 mediate with you.</p> <p>7 "Sean Sayers: Fuck off, not going to mediate with</p> <p>8 me, cunt. Straighten things out [inaudible] fucking</p> <p>9 squeeze. [Inaudible].</p> <p>10 "Male officer 1: You got a good team down there?"</p> <p>11 "Sean Sayers: Huh? No, that's why I did it on my</p> <p>12 own.</p> <p>13 "Male officer 1: Yeah you gotta do it, don't</p> <p>14 don't --</p> <p>15 "Callum Tulley: What did you do?</p> <p>16 "Sean Sayers: Literally picked him up, off his feet</p> <p>17 took him to his room, [threw] him onto his bed,</p> <p>18 I slipped, accidentally landed on him then accidentally</p> <p>19 helped myself up off his face.</p> <p>20 "Male officer 1: Yeah, man ...</p> <p>21 "Callum Tulley: It wasn't on camera, was it?</p> <p>22 "Sean Sayers: Huh?</p> <p>23 "Callum Tulley: It wasn't on camera, was it?</p> <p>24 "Sean Sayers: No ...</p> <p>25 "Callum Tulley: Was gonna say mate, you should be</p> <p style="text-align: center;">Page 136</p>

<p>1 careful."</p> <p>2 And then a voice says:</p> <p>3 "Guy was well unlucky, mate."</p> <p>4 I understand you have now reviewed the footage of</p> <p>5 this conversation and the man that was referred to as</p> <p>6 "Male officer 1" is shown briefly at the end of</p> <p>7 the clip. The BBC identified this as you initially in</p> <p>8 a letter that you received before the broadcast and this</p> <p>9 will be because, on behalf of the BBC, they were told</p> <p>10 that it was you in the room. Do you now accept that it</p> <p>11 was you who made the comments attributed to "Male</p> <p>12 officer 1"?</p> <p>13 A. From looking at the footage, then, yeah, it could have</p> <p>14 been me that made that comment. But I remember you</p> <p>15 could hear in the -- in the news behind it, you could</p> <p>16 actually see the Grenfell Tower had just happened, so</p> <p>17 I was more concentrating on watching the news than I was</p> <p>18 any of this conversation.</p> <p>19 Q. So you might not have been listening to the</p> <p>20 conversation?</p> <p>21 A. I have no knowledge of this conversation.</p> <p>22 Q. Do you remember saying, "You got a good team down</p> <p>23 there"?</p> <p>24 A. I have no memory of this conversation.</p> <p>25 Q. We can watch it if you want to --</p> <p style="text-align: center;">Page 137</p>	<p>1 myself up off his face."</p> <p>2 That's describing assaulting a detainee, isn't it?</p> <p>3 A. Well, after hearing and seeing the footage, then if I --</p> <p>4 at the time, if I was actually paying attention to that</p> <p>5 conversation, I would definitely have reported Sayers,</p> <p>6 but because I didn't hear it, I didn't report it.</p> <p>7 Q. If you'd have heard those exact words, you would have</p> <p>8 reported it?</p> <p>9 A. Yes, because it's assault.</p> <p>10 Q. Who would you have reported him to?</p> <p>11 A. I would have put an SIR in and gone to senior management</p> <p>12 with my concerns.</p> <p>13 Q. Presumably, you wouldn't have asked him if he had a good</p> <p>14 team?</p> <p>15 A. Like I said, I was too busy watching the news to worry</p> <p>16 about this conversation.</p> <p>17 Q. You and Mr Sayers were on the initial training course</p> <p>18 together, I think?</p> <p>19 A. That's correct.</p> <p>20 Q. Then you worked on D wing together?</p> <p>21 A. For a short period.</p> <p>22 Q. You say in your statement you were split up from that to</p> <p>23 avoid being on the same wing because sometimes you were</p> <p>24 both needed in use of force so each wing wouldn't be</p> <p>25 short when you were split up?</p> <p style="text-align: center;">Page 139</p>
<p>1 A. Feel free.</p> <p>2 Q. -- remind yourself of it. I think we can watch this in</p> <p>3 open. If we put it on, KENCOV1036-V2017061500019. If</p> <p>4 you could start it at 3 minutes 35, please.</p> <p>5 (Video played)</p> <p>6 MS MOORE: So you accept that you may be the man who said,</p> <p>7 "Have you got a good team"?</p> <p>8 A. Yeah, I may be that man.</p> <p>9 Q. What would be meant by "Have you got a good team"?</p> <p>10 A. I wasn't even focusing on that conversation. As you can</p> <p>11 clearly hear at the end of the video, I was talking</p> <p>12 about the news.</p> <p>13 Q. You weren't talking about the news when you said "Have</p> <p>14 you got a good team", were you?</p> <p>15 A. I must have overheard the conversation, a slight point</p> <p>16 of it, but I have no knowledge on this incident.</p> <p>17 Q. Does it mean a team who will cover up for you if they</p> <p>18 see you assaulting a detainee?</p> <p>19 A. I just said, "Have you got a good team". I don't have</p> <p>20 anything else I can say on that.</p> <p>21 Q. Mr Sayers said in your presence -- I appreciate the TV</p> <p>22 is on, but you can hear him speaking:</p> <p>23 "Literally picked him up, off his feet took him to</p> <p>24 his room, [threw] him onto his bed, I slipped,</p> <p>25 accidentally landed on him then accidentally helped</p> <p style="text-align: center;">Page 138</p>	<p>1 A. That's correct.</p> <p>2 Q. And as we just heard, in the incident on the courtyard,</p> <p>3 he was one of the people who protected you and brought</p> <p>4 you back into the building?</p> <p>5 A. Yes.</p> <p>6 Q. We already discussed Mr Sayers and his use of force on</p> <p>7 D390, so where you've recorded on the form that he tried</p> <p>8 to negotiate, but was ignored by the detainee, and you</p> <p>9 said he placed a shield on D390 when his attempt to</p> <p>10 negotiate failed?</p> <p>11 A. That's correct.</p> <p>12 Q. You have accepted that he didn't give him a chance to</p> <p>13 ignore his instructions and try and sit on the bed. In</p> <p>14 fact, he rushed in?</p> <p>15 A. Throughout the course of the whole C&R, he was trying to</p> <p>16 de-escalate that detainee.</p> <p>17 Q. What I'm going to suggest here is Mr Sayers spoke in</p> <p>18 front of you about assaulting a detainee and you heard</p> <p>19 him and you chose not to report him?</p> <p>20 A. Unfortunately, like I said before, I wasn't paying</p> <p>21 attention to the conversation. I was concentrating on</p> <p>22 the Grenfell Tower fire.</p> <p>23 Q. Your statement reads, Mr Bromley, at page 48, when you</p> <p>24 were asked about Mr Sayers as well as other people:</p> <p>25 "I had no concerns about his views or behaviours.</p> <p style="text-align: center;">Page 140</p>

1 I do not recall ever witnessing Sean Sayers use
 2 derogatory, offensive or insensitive remarks and did not
 3 witness any incidents of verbal or physical abuse."
 4 So you had no concerns about his views or behaviours
 5 then. Have you changed your mind since seeing what he
 6 said on this footage?
 7 **A. Obviously, now I'm seeing the footage, then, yeah,**
 8 **because these things aren't right, but at the time of**
 9 **working with him, and during that whole course, I never**
 10 **saw anything about Sean that was bad. He was a good**
 11 **officer and experienced in C&R. He was well liked by**
 12 **the detainees and other staff.**
 13 Q. You never heard him say similar comments to this, but in
 14 a conversation where you were paying attention?
 15 **A. Absolutely not.**
 16 Q. Mr Bromley, I have no further questions for you. The
 17 chair may, though?
 18 THE CHAIR: I don't have any questions for you, Mr Bromley.
 19 Thank you very much for giving your evidence. I know it
 20 is not an easy experience, but I'm grateful for you
 21 coming today.
 22 **A. I appreciate that.**
 23 MS MOORE: Chair, we have Mr Fiddy now. I suggest we have
 24 a break of 15 minutes to allow us to swap around. If we
 25 return at 2.45 pm for his evidence.

Page 141

1 THE CHAIR: Thank you very much.
 2 (2.27 pm)
 3 (A short break)
 4 (2.45 pm)
 5 MR EDMUND JOHN FIDDY (sworn)
 6 Examination by MS TOWNSHEND
 7 MS TOWNSHEND: Chair, we will now hear from Mr Edmund Fiddy.
 8 Mr Fiddy, please could you give your full name?
 9 **A. Edmond John Fiddy.**
 10 Q. Is it correct that you have provided a witness statement
 11 to this inquiry, signed and dated 9 February 2022?
 12 **A. Yes.**
 13 Q. Chair, may this now stand as Mr Fiddy's evidence and be
 14 adduced into evidence in this inquiry?
 15 **A. Thank you.**
 16 Q. It is reference number <MAR000002>.
 17 Mr Fiddy, I want to ask you first about your
 18 employment at Brook House as a DCO and, in particular,
 19 the dates. Is it correct that you were a DCO from
 20 27 April 2015 to 12 October 2017?
 21 **A. I believe so.**
 22 Q. What was it that you did before becoming a DCO?
 23 **A. I worked as a project coordinator for**
 24 **a telecommunications company. So, like, I was**
 25 **coordinating people, installing fibre broadband in the**

Page 142

1 **ground. So office/admin type role.**
 2 Q. So you worked in an office?
 3 **A. Yes.**
 4 Q. Did you have any experience, before working at
 5 Brook House, of working in a custodial environment?
 6 **A. No.**
 7 Q. Since you've left Brook House, what have you done for
 8 a living?
 9 **A. So I'm in finance now, so I'm a mortgage advisor**
 10 **currently. Before that, I worked as a part-time**
 11 **delivery driver, because I took voluntary redundancy**
 12 **from the company that I went to after G4S. So I was at**
 13 **that company for two and a half years or so and then**
 14 **I took voluntary redundancy to -- to sort of see where**
 15 **I wanted to go next and I took qualifications to become**
 16 **what I am now.**
 17 Q. A mortgage advisor?
 18 **A. Yeah. Is that enough information?**
 19 Q. Thank you. You left, in October 2017, Brook House,
 20 which was just after Panorama aired. Did that influence
 21 your decision?
 22 **A. Partially. I wanted to leave before, and I didn't see**
 23 **a way out mentally. I became, I guess, conditioned to**
 24 **working the shifts, two days off, working the shifts,**
 25 **and I -- you know, had the -- I thought I wanted to, you**

Page 143

1 **know, go and sort of do another career, but, yeah, it**
 2 **was part of it. I couldn't believe what I saw on the**
 3 **TV. It was eye opening, to say the least.**
 4 Q. You said you didn't feel there was a way out. What do
 5 you mean by that?
 6 **A. I think being in the mental space that I was at the**
 7 **time, it was hard to sort of think about your own future**
 8 **and think, "What do I want to do with my life?", because**
 9 **you were so tired and it was always abuse and**
 10 **I wasn't -- it was really hard to focus on myself, if**
 11 **that makes sense.**
 12 Q. I don't want to ask you about details, but what do you
 13 mean about not being in the mental space?
 14 **A. Just mentally drained all the time, and, you know,**
 15 **that's what I mean. I don't know how to --**
 16 Q. Why were you mentally drained all the time?
 17 **A. The shifts were 13 hours or so and -- well, you wouldn't**
 18 **really get a break. It was relentless. I mean, there**
 19 **were good days, when things were running well, but,**
 20 **yeah, towards the end of my time there, yeah, you knew**
 21 **when you clocked in, that there wasn't going to be**
 22 **a reprieve, so to speak, until you clocked out, if you**
 23 **clocked out on time. Does that make sense?**
 24 Q. You mentioned just a moment ago that you felt
 25 conditioned. What do you mean by that, conditioned to

Page 144

36 (Pages 141 to 144)

1 do what?

2 **A. Just, I guess, the repetitive working environment,**

3 **I guess. Yeah, I guess -- not institutionalised, that's**

4 **the wrong word, but I guess it's -- monotonous, I guess.**

5 **It's routine. It's the working of the centre. It's --**

6 **does that make sense? I don't know.**

7 Q. Just before I ask another question, may I ask you to

8 move forward, closer to the microphone. I understand

9 not everybody can hear you on the live stream?

10 **A. Sorry. Is that better?**

11 Q. I'm afraid I don't know because I'm not watching, but if

12 you could just move a little bit closer. Thank you.

13 So you were saying that you felt conditioned by

14 being in a routine, in a shift pattern?

15 **A. Yes.**

16 Q. Did you feel conditioned in any other way to behave in

17 a certain way when you were a detention custody officer?

18 **A. I was very young at the time, and you're thrust into**

19 **a job of -- not authority, but, you know, you're sort of**

20 **looked to to organise the running of the centre, and**

21 **I was 24 or so; naive to custodial working and, yeah,**

22 **you had to encompass the role of a kind of a manager --**

23 **not an actual manager, but you're managing the routine**

24 **and the running.**

25 Q. I'm going to ask you about training. You say in your

Page 145

1 witness statement, paragraph 8:

2 "The application process and induction course did

3 not really prepare me for the reality of working at

4 Brook House."

5 Why do you say that?

6 **A. So there's an eight-week training period -- I think it**

7 **is eight weeks -- where you run through DCO rules. So**

8 **there was an onus on the sort of legal rules for**

9 **a detention centre generally. And so there were certain**

10 **rules that you needed to understand. I can't remember**

11 **the numbers.**

12 **They -- there wasn't any -- so I didn't understand,**

13 **even though it looked like a prison from the outside,**

14 **I didn't understand the -- what the wing would look**

15 **like, what it would feel like, the doors, the keys --**

16 **I know that's really silly things -- until maybe about**

17 **week seven, when they -- I'm guessing at that week, I'm**

18 **not sure, but they showed us a photo of, I assume, when**

19 **it was built, because it was very clean, you know, the**

20 **wing, and I was nervous, because it wasn't something**

21 **that I'd experienced.**

22 **So -- but a lot of people left. So they came --**

23 **after I'd been there a while, the new starters would**

24 **leave within two weeks or a few shifts, because it just**

25 **wasn't -- it was, like, chalk and cheese. There was**

Page 146

1 **training, but then they didn't tell you how -- just**

2 **basic things, how to run the gate, and that caused**

3 **problems because it was very overwhelming.**

4 Q. What were your expectations going into the job? What

5 did you think it was going to be like?

6 **A. I got told that it was a short-term place that, you**

7 **know, ex-prisoners or people that are waiting for asylum**

8 **or bail to go through with the solicitors and the**

9 **Home Office. I got told they would be there for**

10 **a maximum of 72 hours, or three days.**

11 Q. What was the reality?

12 **A. It was ridiculous for the detainees because it was**

13 **uncertain. You know, they would come from prison, for**

14 **example, and they'd done two years or whatever, and they**

15 **were coming to us and it was indefinite. You know,**

16 **people were there -- I remember there was a Vietnamese**

17 **chap, and he was there for -- it felt like two years.**

18 **I mean, he was there a long time. I don't know why.**

19 **I don't know why they were there for that long. Sorry.**

20 Q. So you've spoken about the differences between your

21 expectations and the reality in relation to what type

22 of -- or how long somebody was going to be detained

23 there and what type of person was going to be detained.

24 Were there any other differences between your

25 expectations matching that of the reality at

Page 147

1 Brook House?

2 **A. Sorry, can you say that again? Sorry.**

3 Q. You have yourself said now, and also in your witness

4 statement, that the reality was very different to what

5 you expected it to be like. Why, apart from how long

6 detainees were detained? What were the differences

7 between what you expected and how it actually turned out

8 to be?

9 **A. Being naive and young, I didn't -- I'd never come across**

10 **that much violence and aggression from another person,**

11 **and that was incredibly eye opening.**

12 Q. Who was the aggression from and to?

13 **A. So there were very -- some very aggressive detainees.**

14 **I'm not saying that they were all aggressive at all.**

15 **But there were certain individuals that were more**

16 **aggressive than others, and I wasn't mentally equipped**

17 **to deal with it. There wasn't any training, really,**

18 **regarding that, and you sort of -- you get thrown in and**

19 **go, "Right, the training course is done".**

20 Q. So you're thrown in the deep end?

21 **A. Yeah. It was very much sink or swim -- excuse the**

22 **colloquial term -- and, yeah, there was a lot of people**

23 **that, yeah, had to leave -- well, for themselves.**

24 Q. You say there wasn't really any training. You say in

25 your witness statement that additional training would

Page 148

37 (Pages 145 to 148)

1 have been helpful. That's paragraphs 11, 69 and 122 to
 2 123. What kind of training, additional training, would
 3 you like to have seen?
 4 **A. I think real life situations or -- because I -- we**
 5 **didn't go into the centre -- I don't know if that's**
 6 **a legal thing, when you can't -- because there was,**
 7 **like, a walkway between the training room or the**
 8 **gatehouse and the main residential unit. I don't know**
 9 **whether we weren't allowed in during the training course**
 10 **or -- for clearance or something, I don't know.**
 11 Q. So you couldn't do any work shadowing during the
 12 training course. Is that what you're saying?
 13 **A. No.**
 14 Q. Would that have been helpful?
 15 **A. Yes, because, in hindsight -- well, potentially,**
 16 **I wouldn't have, you know, been working there. Maybe if**
 17 **I saw that to begin with, it might have opened my eyes**
 18 **a little bit more to the situation.**
 19 Q. You said potentially you wouldn't have worked there if
 20 you'd had some work shadowing, and you'd seen the
 21 reality of it. Mr Fiddy, you did work there for two and
 22 a half years, so --
 23 **A. Yeah. Maybe that's a stretch. I think, at the**
 24 **beginning, there was quite a lot more staff, and**
 25 **I had -- there was a regular team that I worked with on**

Page 149

1 **D wing, Delta -- Dove -- Dove wing. I think they were**
 2 **a support bubble. I think everyone gets a bit nervous**
 3 **starting a new job. Yeah. I think I wanted to give it**
 4 **a go and try and make a difference, and I didn't want to**
 5 **be a quitter. You know, I didn't -- if that answers**
 6 **your question.**
 7 Q. I want to ask you about specifically use of force
 8 training. You said at paragraphs 12 and 18 of your
 9 witness statement that you had annual refreshers for use
 10 of force, but, and I quote:
 11 "... I do feel as though more regular training
 12 should have been provided because I know that I, and no
 13 doubt others, often felt uncomfortable when it came to
 14 use of force and/or confrontation with detainees."
 15 Why did you feel uncomfortable?
 16 **A. I didn't want to, you know, hurt anyone. You know,**
 17 **I wasn't there to restrain someone. I never felt**
 18 **comfortable. You know, you get the call to put on PPE**
 19 **and, instantly, you know, your body is -- well, my body**
 20 **is ... it's scary. What was the initial question,**
 21 **sorry? Training?**
 22 Q. It was about use of force training, and you'd said in
 23 your witness statement that you felt uncomfortable doing
 24 use of force. I was just asking you why you felt
 25 uncomfortable?

Page 150

1 **A. I think there was a week of use of force training with**
 2 **basic holds by the book, by the guidelines. "This is**
 3 **how you hold a hand" or, you know, how it works. I know**
 4 **it's difficult until maybe you've done it once or twice;**
 5 **it's all very different, all the -- every situation is**
 6 **very, very different. But I never felt comfortable.**
 7 **I didn't feel like there was enough onus on training --**
 8 **training, training, training. You know, it should have**
 9 **been done at least every month, potentially, in the**
 10 **classroom, and there just wasn't enough. It was assumed**
 11 **that you passed the course and you're legally trained to**
 12 **do it, which, after a week, is, in my opinion, not**
 13 **enough.**
 14 Q. You said that "no doubt others often felt
 15 uncomfortable". How did you know that other detention
 16 custody officers felt the same way?
 17 **A. They used to fear it. They used to say -- you used to**
 18 **get a phone call sometimes on the wing and it was, like,**
 19 **luck of the draw, and you wished it wasn't you**
 20 **personally, and you were in fear of, you know.**
 21 Q. What were you in fear of exactly?
 22 **A. It was a very dangerous place, and there was a lot of**
 23 **people who would be, like, injured. I didn't --**
 24 **I didn't want to go to the hospital or -- yeah,**
 25 **I didn't -- like ...**

Page 151

1 Q. When you say a lot of people got injured, do you mean
 2 detained persons or do you mean staff or both?
 3 **A. I assume both. I know I'm not -- I'm unsure about the**
 4 **detainees. I'm unsure. I don't know. But I know there**
 5 **were some staff members that sort of were taken to**
 6 **hospital and there were injuries and things because it**
 7 **was a bit of an unknown what's the situation in the room**
 8 **and things like that. Does that answer?**
 9 Q. I'll come back to specific use of force incidents in
 10 a moment. I want to now move on to your views about
 11 senior management. You say in your witness statement at
 12 paragraphs 47 to 48 that they were notoriously
 13 unavailable during a shift if they were asked to come to
 14 the wing floor. You said that they stay in their office
 15 on the top floor and only came down briefly to review
 16 and sign ACDT forms, which took about five minutes. Are
 17 you talking there about DCMs or are you talking about
 18 further up the line of senior management?
 19 **A. The senior management team.**
 20 Q. Anyone in particular that you felt should have been more
 21 visible and wasn't?
 22 **A. All. All of them.**
 23 Q. So Steve Skitt, for example, or Jules Williams,
 24 Michelle Brown?
 25 **A. Jules was around more than Michelle Brown and Steve --**

Page 152

38 (Pages 149 to 152)

<p>1 Steve. Ben, I'm not sure of his surname.</p> <p>2 Q. Ben Saunders.</p> <p>3 A. I don't recall seeing him ever on a residential unit.</p> <p>4 However, he was -- he would sometimes come to the</p> <p>5 briefings in the morning.</p> <p>6 Q. Are you able to give any examples of when it was an</p> <p>7 issue that there were no senior management -- members of</p> <p>8 the senior management team that were around on the wing?</p> <p>9 A. Like a specific --</p> <p>10 Q. Yes.</p> <p>11 A. I'm not sure. I can't -- I don't know.</p> <p>12 Q. So why was it -- or was it an issue, the fact that</p> <p>13 senior management weren't around?</p> <p>14 A. It was a lack of leadership across the whole company.</p> <p>15 I'm not -- you know, potentially, they can lead by</p> <p>16 example, and -- because a lot of them, I believe, have</p> <p>17 worked as a prison officer or on the wing or -- so their</p> <p>18 insights and their -- yeah. I think there were some</p> <p>19 detained persons that wanted to speak with a bit more</p> <p>20 higher manager, you know, not just a DCM, and it was</p> <p>21 tricky to get them to come down to speak with people.</p> <p>22 Q. What kind of issues would detainees raise which meant</p> <p>23 that they wanted to speak to senior management?</p> <p>24 A. I can't remember a specific -- I know food was an issue,</p> <p>25 but I don't know, sorry.</p> <p style="text-align: center;">Page 153</p>	<p>1 A. I can't remember specifically, to be honest.</p> <p>2 Q. Was it during use of force incidents or in relation to</p> <p>3 detained persons self-harming or can you think of an</p> <p>4 example?</p> <p>5 A. He didn't really get involved with use of force.</p> <p>6 I don't remember him -- I don't think that was his job.</p> <p>7 I don't know. It was just generally how he spoke to me</p> <p>8 all the time and -- yeah, it's quite not what you want</p> <p>9 from a manager.</p> <p>10 Q. Did he speak to other DCOs and DCMs like that?</p> <p>11 A. It didn't feel like it, which made it worse. Yeah,</p> <p>12 I tried to avoid him in the end because -- yeah. It</p> <p>13 felt like if I did the same thing as another officer, it</p> <p>14 would be, why am I doing that, or what -- you know, just</p> <p>15 things like that. I can't remember specific</p> <p>16 conversations or things like that.</p> <p>17 Q. We've heard from other DCOs during this inquiry about</p> <p>18 hearing the phrase, and the phrase being used, "man up".</p> <p>19 Dan Small spoke about the expectation of managers that</p> <p>20 DCOs would man up, and he also described a macho</p> <p>21 culture, as you have. We have also heard detention</p> <p>22 centre officers using that phrase "man up" towards</p> <p>23 detainees, so Charlie Francis last week told the inquiry</p> <p>24 the phrase was often -- he often used it towards</p> <p>25 detainees even when they were self-harming.</p> <p style="text-align: center;">Page 155</p>
<p>1 Q. You say food -- quality, quantity, that type of thing?</p> <p>2 A. I think both. Variety. Yeah.</p> <p>3 Q. You've mentioned Jules Williams. In your witness</p> <p>4 statement, paragraphs 43 to 45, you say that you felt</p> <p>5 bullied and treated unfairly by Jules Williams. In what</p> <p>6 way?</p> <p>7 A. I think -- because I was young, naive, as I've said,</p> <p>8 and, you know, you're trying to fit -- you fit in and do</p> <p>9 the best that you can, given the circumstances, or</p> <p>10 specific circumstances, daily, and naturally you want to</p> <p>11 know that you're, you know, doing well, and I guess</p> <p>12 people think of you as -- you know, they're doing the</p> <p>13 job well and he's working well.</p> <p>14 Q. So you were looking for reassurance and support from</p> <p>15 Jules Williams?</p> <p>16 A. I guess, naturally, you know, he was a powerful figure,</p> <p>17 but, yeah, I mean, there's things that I would do, you</p> <p>18 know, the same as someone that showed me, you know,</p> <p>19 like, in terms of, I don't know, unlocking the door, or</p> <p>20 whatever, and he would always undermine me in front of</p> <p>21 all the staff, belittle me, and it felt pretty</p> <p>22 humiliating, to be honest. It was quite a "man up"</p> <p>23 culture. Yeah.</p> <p>24 Q. In what situations did Jules Williams tell you to</p> <p>25 "man up"?</p> <p style="text-align: center;">Page 154</p>	<p>1 Darren Tomsett this morning admitted saying it when</p> <p>2 a detained person had asked for underwear. Was this</p> <p>3 a phrase that you heard a lot, "man up"?</p> <p>4 A. Not from -- not literally, I don't think. Not that</p> <p>5 I can recall.</p> <p>6 Q. Do you recognise the description that Dan Small said</p> <p>7 about the culture being a macho culture?</p> <p>8 A. Yes.</p> <p>9 Q. Why do you say that?</p> <p>10 A. It was -- it felt like it was assumed, you're the</p> <p>11 officer, you know, you have to just get on with it and</p> <p>12 deal with things that personally I needed more help</p> <p>13 with, you know, mentally, and it was just a "Get on, do</p> <p>14 it", and, yeah, like, the staff, if there was an</p> <p>15 incident or something, you would have to crack on and do</p> <p>16 it, and then try and make sure everything else is</p> <p>17 maintained and running and it's just, "Deal with it",</p> <p>18 basically, which I assume is like a macho thing to say</p> <p>19 and do.</p> <p>20 Q. That phrase "man up", do you think that kind of language</p> <p>21 contributed to that macho culture?</p> <p>22 A. If -- yeah, I guess, if it was used specifically, you</p> <p>23 know, the words, you know, you take from it. That --</p> <p>24 I take the word -- that's what you take from it.</p> <p>25 Q. Did you ever raise a grievance about Jules Williams with</p> <p style="text-align: center;">Page 156</p>

1 anybody?

2 **A. No.**

3 **Q. Why not?**

4 **A. I was scared. I didn't want to be sacked. I was close**

5 **to -- I can't remember specifically what happened.**

6 **I think it was just an accumulation of him sort of being**

7 **at me sort of thing, and I went to HR, because I was**

8 **upset. I can't remember why. As I say, it was more of**

9 **an accumulation. So I went to HR and I specifically**

10 **said it's borderline bullying. I don't know why**

11 **I remember that, but I -- so he -- I sat down for five**

12 **minutes, which was nice, and then I went back to the**

13 **wing and just got on with it.**

14 **Q. So you "sat down for five minutes, which was nice". Why**

15 **was it "nice"?**

16 **A. It was a nice atmosphere at the top of the building. It**

17 **was quiet. And it didn't feel like a prison, you know,**

18 **because it was like an admin-type -- the senior**

19 **managers' offices were there, the HR was there. So,**

20 **yeah, the noise is, yeah, loud, so it was nice. But**

21 **I guess I felt bad for leaving the unit, because, if you**

22 **leave to do something, you're leaving the unit -- sorry,**

23 **the wing, if you like, short staffed, and you felt bad.**

24 **You felt like your responsibility to -- the staff and**

25 **the detainees, because there's always things that need**

Page 157

1 **to be done, and if there's only one, unfortunately, you**

2 **can't do everything.**

3 **Q. We will come on to staffing levels in a moment. So you**

4 **went to HR about Jules Williams and complained about**

5 **what you have described as borderline bullying?**

6 **A. Yes.**

7 **Q. Was anything done by HR?**

8 **A. No. I didn't -- yeah. I didn't want to make waves.**

9 **I didn't -- you know, as I say, I needed the job, and --**

10 **yeah. Sometimes you just need to calm for two minutes**

11 **and just -- as I say, things need to keep running.**

12 **Q. Did you think about using a confidential whistleblowing**

13 **line, like "Speak Out", in terms of G4S?**

14 **A. I don't know what that is.**

15 **Q. I'll move on to staffing levels.**

16 **A. Right.**

17 **Q. You say in your witness statement that there were times**

18 **when there were only one or two staff on the wing. That**

19 **was for how many detainees?**

20 **A. On D wing, I think we had 102, 110, it was 20 -- I think**

21 **it was 20 rooms on each floor. Maybe 120 then. I'm not**

22 **sure. I can't remember.**

23 **Q. Why was that an issue, having only one or two for that**

24 **many detainees?**

25 **A. I think there's -- you would worry if there was -- if**

Page 158

1 **people needed your help, if there was some sort of**

2 **incident. You know, I don't know, if -- anything. You**

3 **know, if people needed you for something -- obviously**

4 **you'd be helping or doing the food, the servery bits,**

5 **and you just -- you can only spread yourself so thin,**

6 **and it just made things harder because, you know, you'd**

7 **just be trying to fight fires -- not literally, but just**

8 **to try and help everyone, and it was really hard, and**

9 **I appreciate that it wasn't the detainees' fault, and it**

10 **was -- you know, they were getting annoyed by it,**

11 **understandably.**

12 **Q. What wasn't the detainees' fault, sorry?**

13 **A. The staff. If I couldn't help, you know, tensions would**

14 **build because you might not be able to help someone,**

15 **I don't know, their phone was in the office or**

16 **something, but then you had to do the food as well. So**

17 **that's what I mean.**

18 **Q. So you were stretched?**

19 **A. Yes.**

20 **Q. That's the effect on detained persons of understaffing.**

21 **What about the effect on staff?**

22 **A. It became such a normal occurrence, in the end, that**

23 **it -- it was really bad to start off with, because you'd**

24 **think, "Oh, I'm used to three people here", so**

25 **everything can be done, and you don't have any issues**

Page 159

1 **and everyone can help everyone, and it's great. But**

2 **there was always fear -- I think there's no breaks, so**

3 **you can't leave -- you can't say, "Well, just sort the**

4 **wing out yourself", and you can't leave, I think is**

5 **a big -- there was no-one to cover breaks. And**

6 **mentally, I think, you know, if there was an issue or if**

7 **someone was angry with you or, you know, they wanted to**

8 **assault you or take the keys or something, you know,**

9 **hypothetical, it would -- yeah, it would happen. Yeah,**

10 **I think there was a worry, because there were makeshift**

11 **weapons and things like that, so it was a worry all the**

12 **time.**

13 **Q. You said in your witness statement that there was more**

14 **than one time that you had to unlock the entire wing by**

15 **yourself, particularly at meal times. Was this safe, do**

16 **you think?**

17 **A. That's a hard question. I think, if everything is**

18 **running smoothly, you know, everyone has their dinner**

19 **and things, but no. You've got 120 people. It's**

20 **something that you try and not think about it, so it's**

21 **not safe. Looking back, yeah, it's not good.**

22 **Q. How did this lack of staff affect staff morale?**

23 **A. It was always talked about. It was always sort of**

24 **a sore point. But it was -- again, it was, "Deal with**

25 **it". You know, you're working here, you've got**

Page 160

40 (Pages 157 to 160)

1 a responsibility to your wing, and, you know, I guess
 2 you did feel pride in your wing -- I did. There was
 3 points where we had an excellent wing, and you sort of
 4 felt responsibility to all the people under your care.
 5 I can't remember the question now.
 6 Q. I was asking you how it affected staff morale. I think
 7 you've answered it. Did you raise any concerns with
 8 anybody about staffing issues?
 9 A. Yes, I always mentioned it verbally to most people,
 10 because it was a general conversation. Everyone was
 11 moaning about it generally. I brought it up -- so we
 12 used to have meetings every six months or so when they
 13 used to lock down the centre so that we could have
 14 a staff briefing, or I'm not sure what they were called,
 15 but it was like an annual or biannual meeting, and
 16 I brought it up in the meeting in front of the whole
 17 centre, and afterwards people were saying, "Oh, we're
 18 glad that you brought it up", because not a lot of
 19 people did bring it up to sort of senior managers.
 20 Q. Just pause there. Do you remember when that was?
 21 A. No. I don't know.
 22 Q. Was it 2015, close to when you started or closer to when
 23 you finished in October 2017, do you think?
 24 A. Probably in the middle. I have no idea, I'm sorry.
 25 Q. You said you raised it with senior management. Was

Page 161

1 there anyone in particular that you raised it with?
 2 A. Well, Ben Saunders was in the meeting. I assume the
 3 other senior managers were there, because everyone was
 4 there. And Michelle Brown.
 5 Q. What did Michelle Brown say in response, if anything?
 6 A. Again, you know, "Deal with it", essentially. She said
 7 it was expensive to train officers and she said -- maybe
 8 not exactly this, but, you know, it's sort of upwards of
 9 £6,500 to -- for the recruitment process and the
 10 training and things like that. So, obviously, budget
 11 was a big thing for them. But they saw that we were
 12 struggling every day. So ...
 13 Q. I want to ask you now about use of force incidents.
 14 There were often unplanned use of force incidents to
 15 prevent detained persons self-harming. Were you often
 16 called to incidents like that?
 17 A. There was a use -- what's the word? -- first response.
 18 So in the morning, there would be -- I'm not sure how
 19 they used to do it, put a tick next to your name or --
 20 I'm not sure. So you'd be part of maybe five or six
 21 people and that if an officer or a detainee was -- there
 22 was an issue or trouble, you know, you would be required
 23 to give assistance. But in terms of unplanned, I guess
 24 everyone potentially would have been in that situation
 25 because things did escalate, you know, between -- you

Page 162

1 know, all the guys. I can't remember a specific
 2 instance of that.
 3 Q. So the documents show, and you will have been provided
 4 with these, I don't think it is necessary to bring them
 5 up on screen now, but you were involved in two use of
 6 force incidents for mentally unwell detainees. The
 7 first was in responding to D87, who had ripped up a bed
 8 sheet and placed a ligature around his neck, and you
 9 said that you could hear screaming prior to the control
 10 and restraint, and you removed items from his room,
 11 including his trainers. Do you remember that incident?
 12 A. Is it one of the videos?
 13 Q. No, it's a different one. You were provided with the
 14 references. I will just go to the other one to see if
 15 you remember this one as well. This was about D274,
 16 which recorded you as being a part of a team who
 17 responded with force to a detained person who had
 18 wrapped a sheet around a door handle in CSU. We have
 19 got the cipher list in front of you. I don't know --
 20 there should be a list of detained persons names.
 21 A. On (indicating)?
 22 Q. Not on the screen. It should be separate. I don't know
 23 if you have got a separate piece of paper.
 24 A. Is that the names?
 25 Q. Yes, it will be a list of names and a list of ciphers.

Page 163

1 Please don't mention the name aloud, but you will see
 2 D87 there. That was what I was talking about at the
 3 beginning, the first incident, which was about
 4 a ripped-up bed sheet had been used as a ligature. And
 5 then the second incident involving D274, which was about
 6 wrapping a sheet around a door handle.
 7 A. Okay.
 8 Q. Do you recall these at all, these incidents?
 9 A. No. No.
 10 Q. Was it quite common that you had to respond to incidents
 11 where detainees were self-harming?
 12 A. Yes. Yeah, I can't remember many instances from
 13 recollection, but I do know there was a lot of, you
 14 know, like, razorblades and -- yeah, the self-harm.
 15 Q. Did you receive any specific training to deal with
 16 detained persons who were self-harming and had mental
 17 health issues?
 18 A. No.
 19 Q. Did you have any training in particular for people who
 20 had PTSD, how to deal with people who had PTSD?
 21 A. No.
 22 Q. Do you think that that kind of training would have been
 23 useful in your job as a DCO?
 24 A. Absolutely. You would be able to potentially understand
 25 more about what they're going through, but we didn't --

Page 164

41 (Pages 161 to 164)

<p>1 we didn't have any training. It was -- if you could</p> <p>2 build a rapport with a detainee, that would be it. So</p> <p>3 you could try and understand them from a rapport point</p> <p>4 of view because you -- you see them every day, you know,</p> <p>5 so you can build up a rapport and you know with some</p> <p>6 detainees -- especially on your unit, you know about</p> <p>7 their family and you know about, you know, things that</p> <p>8 they enjoy. So that would be the only way to try and</p> <p>9 understand from a mental health perspective. But there</p> <p>10 was no training at all.</p> <p>11 Q. That building of rapport, was that enough to be able to</p> <p>12 deal with these very mentally unwell detainees?</p> <p>13 A. Sometimes, no. Especially, I guess, people on E wing,</p> <p>14 you know, that were really unwell. I think it was --</p> <p>15 good rapport, I think, sometimes was enough if you had</p> <p>16 ACDT observations, but I am just speculating, because</p> <p>17 I -- I don't know. Yeah. I don't know.</p> <p>18 Q. When that use of rapport or perhaps call it</p> <p>19 de-escalation techniques, as used in the training, when</p> <p>20 these weren't enough and force was used, was that</p> <p>21 a common occurrence, that force had to be used when the</p> <p>22 rapport wasn't enough?</p> <p>23 A. Can you -- sorry.</p> <p>24 Q. Let me rephrase the question. You said that sometimes</p> <p>25 that rapport building or de-escalation techniques,</p> <p style="text-align: center;">Page 165</p>	<p>1 didn't complain at the time, but, later on, did to the</p> <p>2 Professional Standards Unit.</p> <p>3 What you say in your witness statement,</p> <p>4 paragraph 87, is that you have read the documents and</p> <p>5 watched the associated footage that the inquiry has</p> <p>6 given to you but you have no recollection of it and that</p> <p>7 your actions were justified, reasonable and</p> <p>8 proportionate.</p> <p>9 Please could we bring up on to the screen</p> <p>10 <CJS001619> pages 3 and 4. That is the account that you</p> <p>11 gave just after the incident on the use of force</p> <p>12 documentation. So it is pages 3 to 4. I will summarise</p> <p>13 it, in any case. You said that you came into the</p> <p>14 computer room, you saw DCO Instone-Brewer getting</p> <p>15 shouted at by the detained person, calling him a "racist</p> <p>16 motherfucker". You went to the desk to put a coffee</p> <p>17 down and then the verbal abuse got worse. The detained</p> <p>18 person said, "I'm going to fucking deck him". You said</p> <p>19 the tension got worse and you worried for your</p> <p>20 colleague, DCO Instone-Brewer. He, D1538, stood up and</p> <p>21 started marching towards Luke in an extremely aggressive</p> <p>22 way:</p> <p>23 "He ... got ... into my personal space ... I told</p> <p>24 him to step away ... and back off ... he continued to</p> <p>25 [swear]."</p> <p style="text-align: center;">Page 167</p>
<p>1 talking to a detainee, it wasn't enough to help</p> <p>2 a detainee to stop them from self-harming. Did that</p> <p>3 mean that force sometimes had to be used to stop</p> <p>4 a detainee from self-harming?</p> <p>5 A. I can't remember. I guess with the ligatures, you</p> <p>6 know -- I mean, on the -- you know, obviously force team</p> <p>7 had to go in as shown on some of the footage with people</p> <p>8 that had the bedsheets and things, but I don't --</p> <p>9 I don't know -- frequency, I don't know how often or --</p> <p>10 I wouldn't know that information.</p> <p>11 Q. I want to now go on to a specific incident which you</p> <p>12 were involved in which we will go into in some depth and</p> <p>13 that's involving D1538. That was an incident that</p> <p>14 occurred on 3 June 2017. I don't think it is necessary</p> <p>15 to bring it up on screen, but you will have it in your</p> <p>16 bundle if you do want to refer to it. It's D1538's</p> <p>17 witness statement, which is <DL0000231> at pages 24 to</p> <p>18 27, paragraphs 89 to 90 and 96 to 98. I'm just going to</p> <p>19 summarise what he says for you. He says that he had</p> <p>20 a dispute with DCO Instone-Brewer about access to</p> <p>21 a computer. He was next to both of you and was not</p> <p>22 looking directly at you. You then pushed him twice.</p> <p>23 You were the first one to use force. He did not grab</p> <p>24 you around the neck as your use of force documentation</p> <p>25 says. He says he was simply defending himself. He</p> <p style="text-align: center;">Page 166</p>	<p>1 You were afraid and you did a defensive push. You</p> <p>2 told him to stay back and then there was verbal abuse:</p> <p>3 "He then came ... to [my] left ... to [maybe] attack</p> <p>4 us ... [so I pushed him again] ... he simultaneously</p> <p>5 grabbed [my back and neck] and ... I pushed him harder</p> <p>6 to stop him [from] assaulting me."</p> <p>7 If we can play now the CCTV footage, it is</p> <p>8 disc 4 UOF 136.17. If I could ask Zaynab to play from</p> <p>9 1:25, please, and playback speed 0.5. This is the CCTV</p> <p>10 from the incident.</p> <p>11 (Video played)</p> <p>12 MS TOWNSHEND: Just pause there a moment. Is that your</p> <p>13 pointing hand there that we can see; do you know?</p> <p>14 A. I assume so.</p> <p>15 Q. Carry on, please.</p> <p>16 (Video played)</p> <p>17 MS TOWNSHEND: Thank you. We also have the PSU complaint,</p> <p>18 which was found to be unsubstantiated. That's page 20</p> <p>19 of <CJS003348>. They found it unsubstantiated because,</p> <p>20 "Evidence supports that Mr D1538 was primarily directing</p> <p>21 his aggression towards DCO Instone-Brewer and that</p> <p>22 DCO Fiddy placed himself in a position to protect his</p> <p>23 colleague. That position was also an invasion of</p> <p>24 DCO Fiddy's personal space by D1538 and the resultant</p> <p>25 proportionate use of force."</p> <p style="text-align: center;">Page 168</p>

<p>1 Mr Collier, Jon Collier, who is an expert that the</p> <p>2 inquiry has commissioned to look at use of force</p> <p>3 incidents, says as follows -- and we can have a look at</p> <p>4 this on the screen, please, Zaynab, <INQ000111> at</p> <p>5 page 112, paragraph 474. I think it is just over the</p> <p>6 page. I'm going to start reading from the middle:</p> <p>7 "Although the grabbing by the neck is not</p> <p>8 a preferred option ..."</p> <p>9 I should say, the grabbing of the neck is you</p> <p>10 towards the detained person:</p> <p>11 "... I hold a view that DCO Fiddy may have raised</p> <p>12 his hands in response to the right arm and automatically</p> <p>13 grabbed the nearest point to push at. In times of</p> <p>14 confrontation staff can use the whole body as potential</p> <p>15 targets for defensive techniques. Training does</p> <p>16 highlight the extreme vulnerable areas, with the neck</p> <p>17 being among these. As a reactive motion the grab was</p> <p>18 momentarily and followed by a push away, as opposed to</p> <p>19 a grab and a 'strangling' type action. DCO Fiddy had</p> <p>20 every right under Common Law to protect himself and use</p> <p>21 reasonable force."</p> <p>22 Do you accept that the statement that you provided</p> <p>23 should be truthful and accurate in a use of force</p> <p>24 documentation?</p> <p>25 A. Yes.</p> <p style="text-align: center;">Page 169</p>	<p>1 THE CHAIR: Would you like Ms Townshend to re-ask the</p> <p>2 question again?</p> <p>3 A. Yes, sorry.</p> <p>4 THE CHAIR: Repeat the question, if you would, Ms Townshend.</p> <p>5 MS TOWNSHEND: We watched the CCTV just a moment ago.</p> <p>6 A. Yes.</p> <p>7 Q. I'm asking you if you accept that the CCTV shows that</p> <p>8 you grabbed the detained person around the neck? We can</p> <p>9 watch it again, if you would like?</p> <p>10 A. Yeah. Yeah. Can we see it again?</p> <p>11 Q. Yes. It's from 1:25, please. I ask again at 0.5</p> <p>12 playback speed.</p> <p>13 (Video played)</p> <p>14 MS TOWNSHEND: Perhaps I'll ask her to pause when we see it.</p> <p>15 Thank you.</p> <p>16 (Video played)</p> <p>17 MS TOWNSHEND: Pause there. Did you see that, Mr Fiddy?</p> <p>18 A. It looks like a push. I mean, he's grabbed my arm, by</p> <p>19 the looks of it, on the CCTV. I guess "grabbing" would</p> <p>20 insinuate wanting somebody to be closer to you, as</p> <p>21 opposed to being pushed away.</p> <p>22 Q. Would you agree that you -- that the contact that was</p> <p>23 made between you and the detainee was on the detainee's</p> <p>24 neck?</p> <p>25 A. It looks that way on the CCTV.</p> <p style="text-align: center;">Page 171</p>
<p>1 Q. It should contain all the relevant detail so that</p> <p>2 somebody who is reviewing the incident can work out if</p> <p>3 it's reasonable and proportionate and if there are any</p> <p>4 training needs?</p> <p>5 A. What do you mean, sorry?</p> <p>6 Q. Do you accept that it is important that your statement</p> <p>7 that you provide after a use of force incident is</p> <p>8 detailed?</p> <p>9 A. Yes.</p> <p>10 Q. And that it provides all of the detail necessary for</p> <p>11 somebody to properly review the incident?</p> <p>12 A. Yes.</p> <p>13 Q. Do you agree that the CCTV we have just shown shows that</p> <p>14 you grabbed D1538 by the head and the neck?</p> <p>15 A. In terms of grabbing -- I mean, I can't remember the</p> <p>16 incident before rewatching it on egress and just now,</p> <p>17 so, as I say, I'm only seeing the same. I can't</p> <p>18 remember the incident and --</p> <p>19 Q. Do you accept that the CCTV shows that you do grab the</p> <p>20 detained person by the neck?</p> <p>21 A. I can't -- I mean, if -- I guess I assume so.</p> <p>22 Q. I'm not asking you to assume anything. I'm asking if</p> <p>23 you saw the CCTV which showed you grab D1538 around the</p> <p>24 neck?</p> <p>25 A. So -- yeah, I don't know how to --</p> <p style="text-align: center;">Page 170</p>	<p>1 Q. Do you accept that you did not put that in your use of</p> <p>2 force statement?</p> <p>3 A. Well, I guess, if it's not in there, then yes.</p> <p>4 Q. Do you agree that the training provided to you was that</p> <p>5 you should not touch or grab or push a person by their</p> <p>6 neck because it's an extremely vulnerable area?</p> <p>7 A. I appreciate that it's definitely very vulnerable and,</p> <p>8 yes, that wasn't a training technique, but I guess, as</p> <p>9 shown in the report, you know, it was justified at the</p> <p>10 time to protect myself, and it was, in my opinion,</p> <p>11 reasonable and no more force was used than needed to be.</p> <p>12 Q. I want to ask you now about a conversation you had with</p> <p>13 Joe Marshall. Please could I ask Zaynab to put up</p> <p>14 <TRN0000030>, pages 15 to 16. This is a transcript of</p> <p>15 a conversation you had with Joe Marshall about use of</p> <p>16 force. It is tab 6 of the bundle if you want to follow</p> <p>17 it with me. Pages 15 to 16, line 466. Going from 463,</p> <p>18 Joe Marshall says:</p> <p>19 "And all you can hear on the body cam is just --</p> <p>20 it's fucking unbelievable. I pissed myself, most</p> <p>21 unbelievable screaming. You know what they do, how much</p> <p>22 unbelievable screaming.</p> <p>23 "Ed Fiddy: I do -- I do love watching the</p> <p>24 playbacks.</p> <p>25 "Joe Marshall: I know it sounds horrible, it sounds</p> <p style="text-align: center;">Page 172</p>

43 (Pages 169 to 172)

1 really horrible. But I found that quite funny.
 2 I remember the one that I'd done in CSU. Exactly the
 3 same thing, took him onto his front, not his back,
 4 obviously put his arm round and then mate his screaming.
 5 I couldn't help it I was laughing. You know 'Allah,
 6 they are killing me' sort of puts me in the mood for it
 7 again but I end up thinking, am I fucking retarded?
 8 You've got to be mentally retarded.
 9 "Ed Fiddy: I hate it -- I hate it when they're like
 10 'I'm resisting, I'm resisting', I'm like shut the fuck
 11 up."
 12 Do you remember this conversation, Mr Fiddy?
 13 **A. No, sorry, I don't remember.**
 14 Q. Do you know who you were talking about?
 15 **A. I don't know who -- I don't know who -- I don't know.**
 16 Q. Do you accept that it was you making these remarks?
 17 **A. I can't remember this conversation, so ...**
 18 Q. Do you know what you meant by the fact that you love
 19 watching playbacks?
 20 **A. I'm unsure what that would mean because -- well, the**
 21 **only -- the only -- from recollection, the only time you**
 22 **would potentially see camera footage would be during use**
 23 **of force training, so I don't understand -- I don't**
 24 **know -- in terms of playback, I don't know.**
 25 Q. Could you have watched it when you had to review any use

Page 173

1 of force incidents, and perhaps if there had been
 2 a training issue or something that you were being told
 3 you need to do differently, for example?
 4 **A. I wasn't aware of any specific sort of critique, you**
 5 **know, afterwards, in terms of, you know, what could have**
 6 **been done better or, you know, that sort of thing. So**
 7 **I'm unsure, I'm sorry.**
 8 Q. Do you know why you would have said that to Joe Marshall
 9 about "love watching playbacks"?
 10 **A. I don't know why I would have thought that would be an**
 11 **acceptable thing to say. I have no recollection of this**
 12 **conversation.**
 13 Q. What about saying, "I'm like shut the fuck up" to
 14 a detainee? Have you ever spoken to a detainee like
 15 that before?
 16 **A. Not to my recollection.**
 17 Q. Not to your recollection, or you haven't?
 18 **A. From my memory, no. I mean, you know, I would treat**
 19 **everyone as, you know, I would like to be treated.**
 20 **I think in the centre there was terrible swearwords used**
 21 **by everyone all the time and it was -- it was sort of**
 22 **ingrained sort of into the language. It was just**
 23 **prevalent in Brook House.**
 24 Q. So this kind of language was prevalent. So do you
 25 accept you could have said something like this, "Shut

Page 174

1 the fuck up", to a detainee?
 2 **A. I wouldn't say so. As I say, there was -- there would**
 3 **have been swearwords used all the time, and I'm not --**
 4 **I am not proud of the language at all. It was -- yeah,**
 5 **it was just -- it was like a normal language. Like,**
 6 **everyone -- it was -- you know, normalised, I guess, if**
 7 **that makes sense.**
 8 Q. You're talking about swearing being normal. But there
 9 are some ways to swear which don't involve threats, so
 10 would you agree that, "I'm like", talking to a detainee,
 11 "shut the fuck up", do you agree that that would be
 12 a threat?
 13 **A. No, I wouldn't -- I wouldn't see that as a threat**
 14 **per se. I don't --**
 15 Q. Mr Fiddy, you would be a person in power. You were
 16 a DCO. If you were talking to a detainee like that,
 17 it's likely that you would have more power over
 18 a detainee than he had over you. So a detention centre
 19 officer saying that to a detainee, "Shut the fuck up",
 20 you wouldn't agree that that could be interpreted as
 21 a threat?
 22 **A. Potentially. I mean, looking at the, you know,**
 23 **transcript, it's not enjoyable reading and it's -- as**
 24 **I say, I'm not proud of the swear -- you know ...**
 25 Q. So do you agree it is you, because you said, "I'm not

Page 175

1 proud of it"?
 2 **A. No, just swearing in general. Swearing was a normalised**
 3 **thing. As I say, I have no recollection of this**
 4 **conversation, so it's hard -- you know, it's five years**
 5 **ago. I have no recollection of this.**
 6 Q. So you said you're not proud. So even if you can't
 7 remember this specific incident, does that mean that
 8 maybe you've said similar things before, not including
 9 this incident?
 10 **A. Well, you just swear, like, in a normal conversation,**
 11 **you know, nothing, like -- it wouldn't be like**
 12 **a direct -- just like a -- when you're just conversing.**
 13 **Does that make sense?**
 14 Q. It does. There's a difference between swearing in
 15 a normal conversation, talking about a film, "That film
 16 was crap", something like that, and saying to a detainee
 17 when they're resisting use of force incident, "Shut the
 18 fuck up". Would you agree? The difference between
 19 those two types of -- swearing in everyday conversation
 20 and swearing towards somebody, towards a detainee?
 21 **A. I never told a detainee to -- that phrase.**
 22 Q. Do you think it would have been an appropriate thing to
 23 say to a detainee?
 24 **A. No.**
 25 Q. Would it be an appropriate thing to say about

Page 176

44 (Pages 173 to 176)

<p>1 a detainee?</p> <p>2 A. It's not professional.</p> <p>3 Q. You said earlier that you weren't proud when speaking</p> <p>4 like that. Were there other instances where you spoke</p> <p>5 about detainees like that?</p> <p>6 A. I don't believe so. As I say, it's a long time ago.</p> <p>7 I just remember that swearing was normalised language.</p> <p>8 Q. Let's go on to read what's in the transcript. So 475 on</p> <p>9 the same page, page 15. You say:</p> <p>10 "I mean we had one, the initial [inaudible] didn't</p> <p>11 really annoy me, it was just him, he kept, he was</p> <p>12 fucking in like this, holding his hands [Ed Fiddy mimics</p> <p>13 a detainee curling into a ball].</p> <p>14 "Joe Marshall: Yeah, that's the worse you can get.</p> <p>15 "Ed Fiddy: 'I'm not resisting, they're assaulting</p> <p>16 me, I'm willing to go, I'm not resisting' [inaudible]</p> <p>17 I gave him pain compliance in the end. Ah such</p> <p>18 [inaudible]."</p> <p>19 You say you can't remember that conversation?</p> <p>20 A. No.</p> <p>21 Q. You don't remember which use of force incident you were</p> <p>22 speaking about?</p> <p>23 A. No.</p> <p>24 Q. Which detained person?</p> <p>25 A. No, I'm sorry.</p> <p style="text-align: center;">Page 177</p>	<p>1 is at <INQ000088>. It's the third page. Tab 12. At</p> <p>2 the top of the page:</p> <p>3 "We have to get hands on C&R. We have to assault</p> <p>4 people, which is effectively what it is."</p> <p>5 Those comments indicate that you thought that many</p> <p>6 of the incidents of use of force or C&R at Brook House</p> <p>7 amounted to assault. Did you ever assault a detainee?</p> <p>8 A. When you have to get kitted up with the PPE, you're</p> <p>9 doing something that no-one wants to do. You know,</p> <p>10 no-one wants to put hands on someone else and, you know,</p> <p>11 I wouldn't want, you know, the same and it's -- yeah.</p> <p>12 It's just not -- can you ask me the question again,</p> <p>13 sorry?</p> <p>14 Q. I asked you if you ever assaulted a detainee?</p> <p>15 A. No. No. Absolutely not.</p> <p>16 Q. Why did you say in your interview that "we have to</p> <p>17 assault people, which effectively is what it is". What</p> <p>18 did you mean by that?</p> <p>19 A. Just C&R, control and restraint, in general. The whole</p> <p>20 having to resort to that. It's effectively -- well,</p> <p>21 putting hands on someone that doesn't want it, you know,</p> <p>22 it looks -- well, in my opinion, it's -- well, it's not</p> <p>23 good, is it, having to be in that situation? As I said</p> <p>24 earlier, it's just a terrible position to be in and --</p> <p>25 yeah. Yeah. It's not ...</p> <p style="text-align: center;">Page 179</p>
<p>1 Q. Do you think you actually did do that, that you gave him</p> <p>2 pain compliance in the end? Do you remember what you</p> <p>3 were talking about?</p> <p>4 A. I don't remember this conversation. However, with pain</p> <p>5 compliance, it was a sort of last resort use of force</p> <p>6 technique. But, as I say, I cannot remember this</p> <p>7 conversation, unfortunately.</p> <p>8 Q. Why would you use pain compliance if a detained person</p> <p>9 wasn't resisting?</p> <p>10 A. Well, you wouldn't.</p> <p>11 Q. So why did you say it?</p> <p>12 A. As I say, I can't remember this. But you wouldn't</p> <p>13 use -- you know, it would be a last resort technique.</p> <p>14 Q. So would you agree that it's not in accordance with your</p> <p>15 training on use of force to give pain compliance -- use</p> <p>16 pain compliance techniques where somebody isn't</p> <p>17 resisting?</p> <p>18 A. Yeah, you wouldn't -- if -- yeah, the only time I guess</p> <p>19 that was deemed acceptable was in an incident of that</p> <p>20 resisting.</p> <p>21 Q. Do you agree it sounds there that you were trying to</p> <p>22 cause pain to the detained person deliberately?</p> <p>23 A. I would never do that.</p> <p>24 Q. I want to take you to an interview that you gave with an</p> <p>25 academic, Dominic Aitken, whilst at Brook House, which</p> <p style="text-align: center;">Page 178</p>	<p>1 Q. I want to ask you about drugs. You say in your witness</p> <p>2 statement, at paragraphs 37 to 38, that in the reality</p> <p>3 of Brook House any drug prevention policy was not</p> <p>4 effective. Is that right?</p> <p>5 A. I am unsure what the policy was or is. I don't --</p> <p>6 I mean, if there was, it was evident that something was</p> <p>7 potentially not working.</p> <p>8 Q. You talk in your witness statement about the use of</p> <p>9 spice and that it turned detained persons into zombies.</p> <p>10 How do you think drugs got into the centre?</p> <p>11 A. Well, there was a common, I guess, idea, yeah, must have</p> <p>12 been through visits or -- well, I guess, post, parcels</p> <p>13 were, you know, like, sent in to reception, and I know</p> <p>14 there was -- I don't think she worked for G4S. Someone</p> <p>15 I think got sacked or something along those lines, I'm</p> <p>16 not sure.</p> <p>17 Q. Did you know of any officers bringing drugs in?</p> <p>18 A. No.</p> <p>19 Q. I want to take you now to another transcript,</p> <p>20 <TRN0000023>, page 2, lines 1 to 6. It's tab 7. These</p> <p>21 are comments that you made to Callum Tulley about drugs</p> <p>22 entering Brook House. You say:</p> <p>23 "We know there's not much coming through, like</p> <p>24 before ... I don't think it's a lot. It's not enough</p> <p>25 I mean."</p> <p style="text-align: center;">Page 180</p>

1 You were talking there about drugs, weren't you,
2 when you said, "I don't think it's a lot?"
3 **A. I don't know. I don't recall this conversation.**
4 Q. Well, what did you think about drugs? Did you think
5 there was not enough drugs coming into Brook House?
6 **A. There's no reason for me to think that. You know,**
7 **drugs, they're, well, terrible. I mean, it's just -- it**
8 **was a massive problem. So I don't know why, you know --**
9 **if this is correct, I don't know why I would say that.**
10 **As I say, I've no recollection of this conversation.**
11 Q. I want to take you to another transcript of comments
12 that you made, <TRN0000031>, page 5. This is tab 8.
13 This is a transcript from 2 June, a conversation with
14 Callum Tulley, where you described somebody as an
15 "Absolute poof. Absolute poofster". Who were you
16 talking about?
17 **A. I have no recollection of this.**
18 Q. Do you accept that it's you who says it?
19 **A. As I say, I have no recollection of this conversation.**
20 **It's not even words that would be in my sort of**
21 **vocabulary. So I'm unsure, you know, where sort of this**
22 **comes from.**
23 Q. Would you like to see the footage? We have got the
24 footage. We can play it. Shall we watch the footage?
25 It's KENCOV1029-V20170620013, and it's 00:25 to 00:45.

Page 181

1 (Video played)
2 MS TOWNSHEND: Can you just pause there? I don't think
3 that's the correct clip. Just give me a moment, please.
4 It should be V201706020013, clip 1.
5 EPE OPERATOR: Sorry, I don't think I have that.
6 MS TOWNSHEND: Chair, may I ask you to rise just for
7 a couple of minutes?
8 THE CHAIR: Of course, that's fine.
9 (4.09 pm)
10 (A short break)
11 (4.15 pm)
12 MS TOWNSHEND: Chair, apologies. We are going to sit in
13 closed for a minute. It is a very short clip.
14 THE CHAIR: Understood. Thank you.
15 IN CLOSED SESSION
16 MS TOWNSHEND: Can we have the volume turned up as much as
17 possible, please, because it is quite hard to hear.
18 Thank you.
19 (Video played)
20 IN OPEN SESSION
21 MS TOWNSHEND: Do you accept that that's you in the clip?
22 **A. Yes. I can only apologise wholeheartedly. It's**
23 **terrible language and behaviour, and I'm sorry.**
24 Q. Do you know who you're talking about?
25 **A. No. I don't know. I'm sorry.**

Page 182

1 Q. Have you used this type of language before at
2 Brook House?
3 **A. No.**
4 Q. Did you use it since?
5 **A. No.**
6 Q. Did you hear other DCOs using that kind of language at
7 Brook House?
8 **A. Not to my recollection. I can't remember.**
9 Q. So why was it that you used it at that time?
10 **A. I've no explanation for that type of language and, as**
11 **I say, I'm sorry. It's terrible.**
12 Q. Can we now turn to another transcript <TRN000019>?
13 THE CHAIR: Sorry, Ms Townshend, can I ask you to pause
14 momentarily? We need to restart the transcript.
15 MS TOWNSHEND: I'm so sorry, that was my fault.
16 THE CHAIR: Mr Fiddy, that's because, when Ms Townshend was
17 asking you questions, we needed to go back into open
18 session. We played the video which was in closed
19 session. We now go back into open session.
20 MS TOWNSHEND: I should have explained. We have to go into
21 closed session, which means it is not reported, so other
22 people don't hear it, because the video hadn't gone
23 through a security process. So we had to go in closed
24 session, which meant that anybody in the public gallery
25 had to leave. And now we are saying they can come back

Page 183

1 again because we have stopped playing the video.
2 **A. Thank you.**
3 Q. I want to ask you now about another transcript,
4 <TRN0000019>. Page 8, tab 9. Page 8, towards the
5 bottom. Scroll down, please. Joe Marshall, at line
6 252, says:
7 "Albanians"
8 "Ed Fiddy: No, Moroccans."
9 "Unknown: Ugh."
10 "Ed Fiddy: Absolute cunts."
11 In the same conversation, DCO Marshall later calls
12 a detained person a "dick" and a "penis". Can I then
13 move to <TRN0000023>, another transcript, tab 7.
14 Page 24 at line 764. You say:
15 "He was just being a cunt, mate."
16 Do you accept that you used this kind of language
17 about detainees?
18 **A. I assume this is a specific sort of situation. Maybe --**
19 **I'm speculating. You know, it looks like it's a sort of**
20 **comment, you know, that he was being an idiot or, you**
21 **know, I -- I can't remember this conversation.**
22 Q. Did you ever use this language in front of detainees?
23 **A. I don't believe so.**
24 Q. Do you agree that this language is derogatory type of
25 language?

Page 184

46 (Pages 181 to 184)

1 **A. It's not acceptable language, swearing as a whole. It's**
 2 **not acceptable.**
 3 Q. Why is it not acceptable?
 4 **A. It's not nice to hear from anyone. You sort of got**
 5 **unaccustomed to that type of language.**
 6 Q. Unaccustomed or accustomed? Was it usual or not usual
 7 to hear that kind of language?
 8 **A. Just swearwords in general in the centre? Yeah, it was,**
 9 **you know, bad, just generally, from detainees, staff, in**
 10 **conversation. It was normalised because it was --**
 11 **seemed to happen, you know, everyone was swearing.**
 12 Q. You say everyone was swearing. We are specifically here
 13 talking about calling detainees "cunts", "dicks" and
 14 "penises". Was that common?
 15 **A. Not to my recollection.**
 16 Q. There are at least two occasions that Callum Tulley
 17 filmed, within five months, you saying it. So you're
 18 saying that it's not to your recollection that it was
 19 common?
 20 **A. Yes, swearing. I can't remember, you know, specific**
 21 **conversations, and I'm not proud at all of some of**
 22 **the language because it's not professional and I can**
 23 **only apologise for it. As I say, it was -- it seemed to**
 24 **be all the time, everyone.**
 25 Q. Do you agree that that unprofessional language that's

Page 185

1 not nice to hear -- that's what you have just said
 2 now -- contributes to detainees being dehumanised, not
 3 seen as humans?
 4 **A. I don't -- can you rephrase the question, sorry?**
 5 Q. That kind of language, calling a detainee an "absolute
 6 cunt", a "dick", a "penis", all those type of
 7 swearwords, do you agree that using that kind of
 8 language about detainees, or to detainees, makes them
 9 seem less than human?
 10 **A. No, I never -- I never would have treated -- I never**
 11 **treated anyone like what you're describing. It's bad**
 12 **language. I don't know how else to ...**
 13 Q. You were using that language about detained persons,
 14 weren't you?
 15 **A. I assume, in, I guess, a private setting. I -- yeah.**
 16 Q. In the centre, you were free to come and go. You were
 17 paid to do your work at the centre?
 18 **A. Yes.**
 19 Q. And the detained persons had to be there?
 20 **A. Yes.**
 21 Q. You controlled what they did, when they did it, all day,
 22 generally -- opened the doors, closed the doors, and so
 23 on?
 24 **A. That was my role.**
 25 Q. So when you used bad language against them, there was

Page 186

1 a power dynamic there, where you were in charge and they
 2 had to do what you said?
 3 **A. I don't believe so.**
 4 Q. Well, you had more power than a detainee; would you
 5 agree with that?
 6 **A. Power in what sense?**
 7 Q. As I said before, you could come in and out of
 8 the centre as you wanted to, you could leave, you could
 9 resign, you didn't have to be there. Whereas a detained
 10 person was forced to be there, against their will?
 11 **A. I assume so, yeah.**
 12 Q. Well, we said at the beginning, or you said at the
 13 beginning, that detained persons sometimes were there
 14 for years.
 15 **A. Yeah.**
 16 Q. Obviously they didn't want to be in detention, did they?
 17 **A. Oh, definitely not.**
 18 Q. So if you were using that kind of language against
 19 detained persons who didn't want to be there, where you
 20 could choose to be there, can you see how that might be
 21 a problem?
 22 **A. I've said that the language is not acceptable from**
 23 **either side, and it was on either side. I appreciate**
 24 **that obviously I can go in and out of the centre,**
 25 **I appreciate that. The language was -- I was going to**

Page 187

1 **say normalised. It's ...**
 2 Q. I want to take you to a final transcript, <TRN0000030>,
 3 pages 3 and 4, lines 78 to 87, tab 6. It is towards the
 4 bottom of the page. Tam Burns says:
 5 "I know. This culture kitchen and I was here last
 6 Friday the form hadn't been handed in with the
 7 ingredients."
 8 You say:
 9 "Mate, I can't say what I used to say."
 10 Tam Burns says:
 11 "Oh my God."
 12 Joe Marshall said:
 13 "No that's the other thing."
 14 You say:
 15 "... If I used to say something I used to ... we
 16 have an amazing wing."
 17 "Tam Burns: Then you won't -- because you don't
 18 know who the new officers have been [inaudible]."
 19 "Joe Marshall: On that same day, [inaudible] you
 20 know that mental piece [inaudible] on D wing."
 21 "Tam Burns: I don't know who those people are."
 22 You see there you say, "Mate, I can't say what
 23 I used to say". Do you know what you're referring to
 24 there?
 25 **A. No, I don't understand that. I don't recall -- I don't**

Page 188

47 (Pages 185 to 188)

<p>1 know what that's referring to.</p> <p>2 Q. Could this suggest that language used before that was</p> <p>3 even more offensive than the language that you've just</p> <p>4 used?</p> <p>5 A. I'd be speculating. I don't know. I said bad language</p> <p>6 was the same -- I don't know.</p> <p>7 Q. You gave your evidence a little earlier, saying this --</p> <p>8 when I asked you, were there other incidents when you</p> <p>9 spoke about detainees like that, you said it wasn't</p> <p>10 professional and you said:</p> <p>11 "I don't believe so. It was a long time ago."</p> <p>12 Are you reminded now, from those transcripts, of</p> <p>13 other times when you did speak about detainees in those</p> <p>14 derogatory terms?</p> <p>15 A. No.</p> <p>16 Q. Well, I have reminded you because we have been through</p> <p>17 them. It is not true, is it, that it was only a one-off</p> <p>18 occasion where you spoke about detainees in this way?</p> <p>19 A. As I say, it was normalised. I don't know whether it</p> <p>20 was stress related. I don't know. As I say, it was</p> <p>21 just all the time, the bad language from everyone.</p> <p>22 I can only apologise for it because it's -- as I say,</p> <p>23 it's not acceptable.</p> <p>24 Q. You say, at paragraph 103 of your statement, that you</p> <p>25 treated all detained persons with dignity and respect.</p> <p style="text-align: center;">Page 189</p>	<p>1</p> <p>2 MR DARREN TOMSETT (affirmed)1</p> <p>3</p> <p>4 Examination by MR LIVINGSTON1</p> <p>5</p> <p>6 Questions from THE PANEL77</p> <p>7</p> <p>8 MR RYAN JOHN BROMLEY (sworn)80</p> <p>9</p> <p>10 Examination by MS MOORE80</p> <p>11</p> <p>12 MR EDMUND JOHN FIDDY (sworn)142</p> <p>13</p> <p>14 Examination by MS TOWNSHEND142</p> <p>15</p> <p>16</p> <p>17</p> <p>18</p> <p>19</p> <p>20</p> <p>21</p> <p>22</p> <p>23</p> <p>24</p> <p>25</p> <p style="text-align: center;">Page 191</p>
<p>1 Do you wish to now amend that part of your statement?</p> <p>2 A. No. I treated everyone -- we had a great -- I had</p> <p>3 a great rapport with the majority, and I think the bad</p> <p>4 language has been, I guess, taken out of context</p> <p>5 a little. You know, looking at it, yeah, I still think</p> <p>6 I had a great rapport and worked well with a lot of</p> <p>7 the detainee persons -- sorry, detainees -- detained</p> <p>8 persons, sorry.</p> <p>9 MS TOWNSHEND: I don't have any more questions. Chair, do</p> <p>10 you have any questions?</p> <p>11 THE CHAIR: I don't have any questions, Mr Fiddy. Thank you</p> <p>12 for coming to give your evidence. I appreciate it's not</p> <p>13 an easy experience, but thank you.</p> <p>14 Ms Townshend, we will be returning at 10 am?</p> <p>15 MS TOWNSHEND: Yes, and we are going to hear from</p> <p>16 Luke Instone-Brewer, Shane Farrell and Stephen Webb</p> <p>17 tomorrow.</p> <p>18 THE CHAIR: Thank you very much. Obviously, I'll see you</p> <p>19 all tomorrow at 10 am. Thank you, Mr Fiddy.</p> <p>20 (4.30 pm)</p> <p>21 (The hearing was adjourned to</p> <p>22 Tuesday, 8 March 2022 at 10.00 am)</p> <p>23</p> <p>24</p> <p>25 INDEX</p> <p style="text-align: center;">Page 190</p>	

A				
able 8:14 12:13 24:24 25:6,11 31:14 52:5 56:4 61:23,24 77:16 79:16 112:18 120:10 153:6 159:14 164:24 165:11	access 24:7 60:3 86:16 95:1 102:24 166:20 accidentally 118:15 136:18,18 138:25,25 accord 69:17,22 70:2 account 23:4 55:13 67:22 93:25 95:14,24 97:18,23 99:7 100:15,21 101:19 102:12 103:22 104:4 105:5,14 106:15 109:23 110:3,17 111:3 113:15 114:2 115:17 120:24 121:11 167:10 accounts 100:14 100:18 105:18 106:2 accrued 85:21 accumulation 157:6,9 accurate 55:12 61:6 94:1 107:21 169:23 accusations 42:22 accused 42:21 63:20 accustomed 185:6 ACDT 21:3,6,15 21:22,24 22:5,7 108:10 152:16 165:16 act 91:14 acted 1:22 123:7 acting 1:25 5:9,11 5:19 66:18 84:1 84:5 96:8 122:23 123:2 128:23 action 20:25 117:21 133:1,3,7 133:8 169:19 actions 102:17,22 167:7 activities 23:23	24:6 81:15 acts 22:11 actual 19:17 29:14 66:6 145:23 additional 148:25 149:2 address 110:12 121:6 addressed 45:6 adduced 1:12 80:23 142:14 adequate 4:3 adhere 45:13 adjourned 190:21 adjournment 120:17 admin 94:24 adminy-type 157:18 admitted 48:16 156:1 adopting 31:17,18 adrenaline 91:9,13 91:15,17,19 advance 111:16 112:22 115:5 116:18 advanced 111:20 113:3,24 114:4 115:20 advice 33:25 advise 46:19 advised 35:16 64:13 73:4 101:2 104:11 advisor 143:9,17 affect 41:8 72:2,5 160:22 affirmed 1:5 191:2 Afghanistan 42:10 afraid 145:11 168:1 afraid' 53:24 aggression 8:6 105:3 148:10,12 168:21 aggressive 7:23,25 8:2,13 13:18,21 15:24 16:1,9	50:25 64:7,18,20 64:21 97:3,14 101:3,5,10 118:12 121:15 148:13,14,16 167:21 aggressively 51:3 51:11 96:23 ago 3:3 93:20,25 115:13 117:4,7 130:1 136:2 144:24 171:5 176:5 177:6 189:11 agree 89:4 120:1 170:13 171:22 172:4 175:10,11 175:20,25 176:18 178:14,21 184:24 185:25 186:7 187:5 agreed 104:6 Ah 177:17 Ahh 124:24 ain't 54:6 55:5,14 128:7 air 23:21 25:6,15 aired 143:20 Aitken 178:25 Albania 40:13 Albanians 184:7 Allah 173:5 allegation 47:24 49:6,10,21 52:16 58:13 59:16,25 60:7 71:3 134:16 134:21 allegations 43:5 44:2 50:13 51:7 60:20 61:5 62:1 62:22,25 63:2,12 64:17,19 67:13 67:14 77:10 134:16 allege 49:12 alleged 48:24 134:20,20 alleges 49:6 60:24 allow 141:24	allowed 2:18,23 10:21 11:4,11,12 11:15,16,24 25:5 25:7,9 45:16,16 59:5 63:16 149:9 aloud 164:1 Alright 135:11 alter 13:22 am' 135:25 amazing 40:15 188:16 ambulance 36:22 amend 190:1 amount 7:7 amounted 179:7 anchor 126:18 and/or 150:14 anger 44:21 49:16 49:17 angrily 57:25 59:9 angry 7:24 160:7 annoy 177:11 annoyed 159:10 annual 150:9 161:15 answer 13:5 60:6 73:20 152:8 answered 161:7 answers 150:5 anxiety 72:15 anxious 28:7 74:19 anybody 24:4 79:2 79:4 157:1 161:8 183:24 anymore 71:21 75:19 anyway 35:2 119:4 apart 9:2 49:3 148:5 apologies 182:12 apologise 28:18 38:9 182:22 185:23 189:22 appear 8:8 appeared 43:12 51:1,14 appears 54:3 application 4:22 146:2

<p>applied 95:11 98:9 98:10,15 116:7 117:3,10 123:5 apply 4:23 5:2,3 applying 5:6 43:15 99:8 appraisals 19:18 appreciate 39:9 57:11 126:11 138:21 141:22 159:9 172:7 187:23,25 190:12 appreciated 77:17 approach 67:18 70:13 approachable 17:18 appropriate 31:4 176:22,25 appropriately 9:23 10:5 79:17 approximately 86:25 96:1,21 98:9 99:15 101:1 101:4 111:6 116:17 April 95:20 129:14 142:20 area 95:1,3 130:17 172:6 areas 72:7 169:16 argue 54:15 arguing 127:11 argumentative 49:23 arm 95:23,23 98:8 98:9,13,14 100:8 101:17,21 103:5 103:19 105:2 107:6,7,17 111:22 113:19 120:4 122:8 123:3,6 126:17 126:25 169:12 171:18 173:4 arms 61:25 99:9 127:1 arose 27:14 arrive 40:5</p>	<p>arrived 6:15 12:6 13:7 37:1 111:9 arriving 7:12 12:4 arts 121:8 ascertain 20:22 67:2 asked 4:25 27:12 33:16 41:6 49:22 49:25 51:4,25 55:4,10 61:1,13 62:14 66:14 77:14 78:1,8 82:8,13 92:6 96:3,9 101:7 102:24 103:17 104:9,18 105:17 106:22 110:12 131:23 132:3 134:14,22 139:13 140:24 152:13 156:2 179:14 189:8 asking 28:21 46:3 52:8 54:24 55:18 63:19 64:17 74:14 100:17 113:21 117:12,12 150:24 161:6 170:22,22 171:7 183:17 asks 30:20 aspects 126:19 assault 39:1 129:11 134:20,25 139:9 160:8 179:3,7,7,17 assaulted 38:22 179:14 assaulting 138:18 139:2 140:18 168:6 177:15 assaults 133:25 assessing 20:20 assist 12:10,13 103:7,21,24 assistance 68:5 162:23 Assisting 12:17 associated 76:1</p>	<p>167:5 assume 133:1 146:18 152:3 156:18 162:2 168:14 170:21,22 184:18 186:15 187:11 assumed 151:10 156:10 asylum 42:6 147:7 atmosphere 7:21 7:23 8:2 157:16 attack 36:20 168:3 attacked 121:18 attacks 36:18 attempt 114:25 140:9 attempted 103:19 attempting 103:6 attend 36:21 88:21 attention 139:4 140:21 141:14 attitude 13:16 38:5 attracted 2:3 attributed 137:11 August 1:23 4:2 57:21,22 60:25 66:18 authority 145:19 automatically 169:12 available 17:17 65:13 avoid 69:15 70:8 139:23 155:12 avoided 44:1 awaiting 7:11 133:10 aware 15:18 22:25 42:5,13 43:6 62:19 64:1 70:14 74:2,4,15 76:23 78:4 79:10 93:17 109:9,13 174:4 awareness 29:3</p> <hr/> <p style="text-align: center;">B</p> <hr/> <p>B 6:9,21 7:6 25:20 25:21 36:3 47:7</p>	<p>57:1 back 3:3 9:16 10:3 10:15 27:18 29:16 38:13,17 39:13 40:5,11,11 40:25 41:16 42:3 43:16 44:4,20,23 46:4 49:7,18 52:24 57:16 67:10,11 69:11 77:8 87:21,23 94:12,15 102:8 102:16 105:15 108:3 112:6 114:16 116:15 120:9 121:25 122:7 123:9 127:13 130:8 131:2,9,25 134:8 134:18 140:4 152:9 157:12 160:21 167:24 168:2,5 173:3 183:17,19,25 background 1:18 28:20 backhammer 103:6,20 backing 8:21 bad 27:25 28:1 36:20 86:5 141:10 157:21,23 159:23 185:9 186:11,25 189:5 189:21 190:3 bail 147:8 balance 83:15 ball 177:13 bar 45:24 based 30:1 87:20 108:21 basic 147:2 151:2 basically 36:24 135:23 156:18 basis 3:1 11:1 bastard 37:21 battery 97:23,25 98:18,20 99:6 100:6</p>	<p>BBC 134:15 137:7 137:9 bearing 53:10 becoming 4:10 142:22 bed 97:14,17,19 99:4 101:9 104:2 111:21 113:22,25 114:3,5 115:7,11 136:17 138:24 140:13 163:7 164:4 bedsheets 166:8 began 2:9 43:23 77:24 104:12,24 105:2 beginning 46:22 76:9 122:3 149:24 164:3 187:12,13 begun 96:4 111:10 behalf 137:9 behave 145:16 behaved 13:2,17 50:25 51:2,11 62:23 behaving 13:14 behaviour 8:11,13 9:24 45:21 58:1 63:25 92:2 101:3 102:19 104:8 182:23 behaviours 16:5 140:25 141:4 believe 4:21 6:10 13:9 19:7,20,22 24:6 35:11 50:2 52:3 53:20 59:10 64:14 84:19 86:3 99:20,24 100:3 102:8 103:25 108:2 122:17 123:11,17 124:7 142:21 144:2 153:16 177:6 184:23 187:3 189:11 believed 103:22 belittle 154:21</p>
--	--	--	---	--

Belmarsh 92:13	158:5	3:5,10 7:21,23	C	51:8
Ben 17:9 102:3,3	bothered 40:22	9:22 12:5,20	C 53:18 59:6	carried 19:20,22
106:24 153:1,2	bottom 14:6 41:1	13:7 14:5,17	C&R 70:8,11 90:8	22:6 116:14
162:2	51:6 54:14 59:3	15:19 16:12	118:10 140:15	carry 120:12
benefits 40:15	107:9 113:17	30:11 31:11 34:3	141:11 179:3,6	168:15
41:12,19 42:16	128:3 184:5	36:8,13,16 41:9	179:19	carrying 89:23
best 9:1 18:23 22:2	188:4	41:11,23 42:5	C&Rs 69:23 70:5	case 3:12 12:8,9,11
53:4 100:16	boundary 28:16	50:25 57:11 61:9	90:22,23	25:23 33:20,23
154:9	boxer 28:21	63:7 71:22 74:19	cabinet 123:16,18	34:3,10,14 44:13
better 117:24	boxers 27:15	75:5,10 76:1,1,7	123:20	55:17 66:7 67:19
145:10 174:6	boys 41:5 43:1	77:6 81:6 82:22	call 17:17,22 29:8	70:4,5 85:3,9
beyond 28:13	Bravo 52:4	84:8 88:14 91:3	36:20 90:9,10	96:11 128:15
39:12,17	break 69:1,5 80:1	91:5 92:13 130:6	120:9 122:24	133:10 167:13
biannual 161:15	80:6 120:9,11	142:18 143:5,7	131:8 150:18	cases 12:14,15,21
big 23:19 25:4,12	128:17 141:24	143:19 146:4	151:18 165:18	31:13 36:22
37:10 50:14	142:3 144:18	148:1 174:23	called 36:22 97:7	133:9,25
65:24 86:7 92:11	182:10	178:25 179:6	121:7 132:19	cash 40:6
95:25 99:11	breaks 81:23	180:3,22 181:5	161:14 162:16	caught 40:10
100:21,23 109:18	160:2,5	183:2,7	calling 30:13	cause 37:12
111:5 112:8	brief 30:18 77:21	brother 60:25	48:22 63:9	178:22
160:5 162:11	90:11 111:7	brought 57:14	130:25 167:15	caused 147:2
biggest 135:23	briefed 91:25	140:3 161:11,16	185:13 186:5	CCTV 107:15
bin 54:16	briefing 91:24,25	161:18	calls 184:11	168:7,9 170:13
birth 83:2	161:14	Brown 17:7	Callum 15:5 26:12	170:19,23 171:5
bit 2:14 3:22 5:11	briefings 153:5	152:24,25 162:4	30:19,20 31:25	171:7,19,25
10:4 21:12 28:15	briefly 47:18 64:2	162:5	32:5 33:10 35:19	cent 90:4 123:14
38:13 42:23	121:6 137:6	bruising 131:12,13	37:18 39:7,23	centre 2:8,10 3:2
71:24 78:15	152:15	bubble 150:2	53:16 54:1 124:2	4:8 10:19 11:18
96:25 108:19	briefs 91:22	budget 162:10	124:14,19,23	12:2 13:13 15:12
109:7 145:12	bring 18:10 71:12	build 46:24 159:14	125:8,16,18,24	18:5 26:1 36:11
149:18 150:2	129:18 161:19	165:2,5	126:1,5 127:5,16	37:13 45:13 47:6
152:7 153:19	163:4 166:15	build-up 74:24	129:5 135:7,13	56:4 68:21 86:12
bits 57:3 159:4	167:9	building 13:2	135:17,22 136:4	86:15 87:12
black 50:23 51:8	bringing 86:10	27:24 47:9 86:17	136:15,21,23,25	145:5,20 146:9
62:23	180:17	128:21 140:4	180:21 181:14	149:5 155:22
blah 135:24,24,25	broad 47:21	157:16 165:11,25	185:16	161:13,17 174:20
blame 34:6 45:21	broadband 142:25	built 47:5,12	calm 70:9 119:16	175:18 180:10
blurry 122:6	broadcast 73:19	146:19	158:10	185:8 186:16,17
board 36:2	137:8	bullied 154:5	calmed 123:10	187:8,24
body 121:15	broadly 23:8	bullying 157:10	cam 172:19	certain 8:19 44:18
150:19,19 169:14	Bromley 80:3,9,10	158:5	camera 32:2 77:15	85:6 87:10
172:19	80:12,15 81:6	bundle 71:11	136:21,23 173:22	145:17 146:9
boiled 115:8	93:1 101:4 104:9	110:16 166:16	cards 11:18	148:15
boiling 111:12,24	104:23 106:23	172:16	care 43:17 97:5	chair 1:3,11,13
113:23 115:14	107:11 113:19	Burns 188:4,10,17	100:5 130:15	68:25 69:2 77:19
116:14 117:11	120:7,20,21	188:21	132:7 161:4	77:21 78:9,12,17
bollocks 27:9	129:16 140:23	bus 40:5	career 144:1	78:21 79:2,6,14
book 151:2	141:16,18 191:8	busy 139:15	careful 137:1	79:19,25 80:4,8
borderline 157:10	Brook 1:19 2:20	buying 43:23	Caribbean 50:24	80:23 95:5 119:4

120:6,14,15,19 141:17,18,23 142:1,7,13 171:1 171:4 182:6,8,12 182:14 183:13,16 190:9,11,18 chair's 110:16 chalk 146:25 challenged 11:13 challenging 13:10 89:13,16 chance 119:13 124:6 140:12 change 2:6 13:23 57:24 59:6,20 63:24 64:8 88:5 90:23 changed 88:6 89:22,25 141:5 channels 132:21 chap 147:17 chaplaincy 50:5 character 92:12 charge 90:8 126:21 187:1 charges 133:15 Charlie 155:23 charter 6:20 7:11 85:7 charters 89:1 chase 57:5 chat 30:18 check 26:3,4 33:7 65:15 75:20 130:17 checking 34:25 checks 66:10 cheese 146:25 chest 111:20 113:4 113:25 114:4,6 chin 37:22,24 chips 71:18,24 choose 29:19 187:20 choosing 29:17 chose 140:19 chosen 90:2,9 chronic 66:4 CID 95:18	cipher 163:19 ciphers 163:25 circle 88:2 circled 100:8 circumstances 72:10 110:22 154:9,10 CJS001443 50:21 CJS001619 167:10 CJS003348 168:19 CJS005530 95:4 CJS005615 122:20 CJS005624 110:15 116:15 CJS005955 135:1 clarification 68:3 class 124:20 classed 126:23 classroom 108:21 128:2 151:10 clean 124:22 125:21,25 126:9 129:6 146:19 cleaned 66:11 cleaning 86:17 clear 119:7 126:20 128:14 130:17 clearance 149:10 clearly 138:11 clenched 104:21 clip 122:2 137:7 182:3,4,13,21 clo 125:9 clocked 125:9 144:21,22,23 close 157:4 161:22 closed 96:19 97:15 101:10 111:11 114:8,9,13 182:13,15 183:18 183:21,23 186:22 closely 111:17 116:20 closer 145:8,12 161:22 171:20 clothes 57:24 59:6 59:20 61:21 clothing 27:16 28:22 29:12,14	co-operate 101:8 co-operation 101:7 cocky 51:3 coffee 167:16 cohort 42:15 coincidence 15:14 colleague 70:15,18 167:20 168:23 colleagues 6:3 9:3 9:6,10 11:7,10 23:15 76:17,21 134:5,6 collect 90:10 collective 75:15 Collier 119:3 120:2 169:1,1 colloquial 148:22 come 2:14 3:17 5:4 10:3,21 13:8 15:8 16:20 17:10 17:14 24:10 26:6 27:25 29:13 38:25 40:1,1,1,4 40:10,11,18,23 40:23 41:2,12,15 42:22 43:3 45:2 46:19 50:18 61:1 62:14 63:16,21 65:5 85:17,19 93:13 106:23 116:1,13 119:9 121:21 133:23 147:13 148:9 152:9,13 153:4 153:21 158:3 183:25 186:16 187:7 comes 10:4 36:1 45:17 114:16 181:22 comfortable 12:3 18:7 37:1,4 150:18 151:6 coming 8:6 11:13 13:19 16:5 23:7 29:18 41:19 42:16 52:4,8 53:18 60:14 66:2	72:15 75:16 79:22 87:12 96:6 141:21 147:15 180:23 181:5 190:12 comment 35:2 43:9 49:14,24 51:20 59:13,16 60:1 100:14 105:11 106:4 108:4 110:10 126:13 135:7 137:14 184:20 comments 26:7,15 27:19,21 28:2,3 28:18 35:11 39:20 42:1 54:20 107:8 135:3,4,6 137:11 141:13 179:5 180:21 181:11 commissioned 169:2 common 63:17 87:11 109:13 164:10 165:21 169:20 180:11 185:14,19 communicated 31:12 communication 96:5 110:8 119:24 company 142:24 143:12,13 153:14 compare 81:20 compared 82:5,20 83:5 107:21 complain 167:1 complained 158:4 complaining 55:2 complains 67:15 complaint 46:3,16 46:21 47:16,24 48:10,25 50:20 50:23 51:5 53:10 54:4,24 57:19,20 57:21,22 58:7 64:2,6 67:8,19,25	68:20,22 72:21 74:5,7,9 78:3 133:11 168:17 complaints 45:3,5 45:11,22,23 46:2 46:6,10,12,15 47:1,12,19 50:18 60:14,15,16 66:19,22,23,25 67:3 68:8,12,13 68:16 73:1,13 77:9,25 completed 105:23 completely 32:12 54:12 67:1,4 111:1 compliance 177:17 178:2,5,8,15,16 compliant 110:9 111:23 compliantly 116:13 complied 99:13 comply 102:20 116:8 118:7 119:21 complying 119:17 computer 94:14 94:17,18,22 166:21 167:14 computers 94:16 concentrating 137:17 140:21 concern 35:12,15 concerned 12:4 35:25 46:14 47:20,21 58:18 concerns 18:12,19 123:21 125:23 128:20,22 129:3 139:12 140:25 141:4 161:7 conclude 99:23 concludes 52:16 119:19 concussed 131:13 131:15 condition 92:3 conditioned
--	---	---	---	--

143:23 144:25,25 145:13,16 conditions 84:9 conduct 51:1,14 74:3 78:3 conducted 61:15 confidence 89:22 confident 126:16 126:18 128:19 confidential 79:9 158:12 confirmation 114:10 conflicts 33:1 confrontation 9:17 10:25 150:14 169:14 confrontational 43:12 confuse 116:5 Connolly 19:13 conscious 29:24 46:9 consequence 7:13 65:20 102:22 consequences 7:6 7:9 9:13 75:24 consider 5:6 35:8 63:22 82:18 considerations 23:3 considered 44:14 82:20 consistent 78:17 consistently 10:24 constant 21:16 109:16 constantly 26:2 contact 98:12 99:3 99:5 103:23 105:8 122:19 171:22 contacting 22:4 contain 170:1 contents 58:4 context 47:22 190:4 continue 71:20 120:19	continued 111:13 111:18 112:10 113:1,8,20 115:18 116:21,25 123:5 167:24 contracted 84:14 contributed 8:1 30:15 156:21 contributes 186:2 control 10:22 88:17,19 98:6,7,8 98:24 101:15,16 101:20,21 103:5 103:9,19 109:25 111:22 123:3,15 126:21 163:9 179:19 controlled 186:21 controlling 10:20 conversation 26:10 27:14 33:15 35:18 37:16,17 39:6,23 44:9 46:7 50:6,7 53:10,15 119:7 124:9,14 125:17 125:18 126:5 127:5,21,22 129:4 134:12,22 137:5,18,20,21 137:24 138:10,15 139:5,16 140:21 141:14 161:10 172:12,15 173:12 173:17 174:12 176:4,10,15,19 177:19 178:4,7 181:3,10,13,19 184:11,21 185:10 conversations 25:16 44:16 87:10 155:16 185:21 conversing 176:12 convictions 92:2 Conway 46:18,19 51:24 52:15 coordinating 142:25	coordinator 142:23 cope 2:19,24 copy 95:18 core 69:8 correct 81:8,12 82:17 83:4,24 84:16 86:20 92:19 94:2 95:16 97:24 101:24 106:8 108:6 109:19 112:9 115:8,25 119:1 123:19 124:8 130:13,21 131:3 131:5 132:2,13 132:22 133:5,21 134:11 139:19 140:1,11 142:10 142:19 181:9 182:3 correctly 77:23 count 46:15 countries 42:10,12 country 40:2,2,3 41:15 43:16 44:5 44:15,15,20,23 49:8,18 couple 6:10,12,15 6:17 16:14 18:24 23:7 27:3,5,7 48:19 53:6 57:7 65:4 68:24 69:13 93:4 117:6 182:7 course 2:15 10:9 23:2 49:10 69:2 82:25 118:10 139:17 140:15 141:9 146:2 148:19 149:9,12 151:11 182:8 courtyard 24:3,14 24:16,20 25:3 129:20 130:16 131:18 140:2 courtyards 24:6,7 24:11,21,23 cover 81:23 82:11 89:11 95:7	138:17 160:5 covered 25:22 72:8 93:9 113:23 121:5 covering 25:19 crack 156:15 crafts 121:8 crap 176:16 criminal 37:20 130:25 critique 174:4 cropped 37:8 crossed 95:23 crowd 130:23 crutch 36:14 CSU 69:25 93:17 93:22 102:20 131:24 163:18 173:2 cuff 126:18 cuffed 105:14 cuffs 105:1,12 culture 13:19,20 30:8,8,10,15 84:8 84:11 154:23 155:21 156:7,7 156:21 188:5 cultures 44:17 cunt 30:25 31:4,8 31:20 48:22 72:12 136:8 184:15 186:6 cunts 184:10 185:13 cup 80:1 curious 76:14,24 curling 177:13 currently 143:10 curtain 51:4,25 52:5,11 53:17,18 53:23 54:25 55:5 55:10,16,18,23 56:2,9,19 64:7,17 65:6,8,9,20 curtains 52:1,9,18 55:19,20,20 56:2 56:4,6,23,24 57:4 64:14 65:10,11 65:12,16,17,18	66:4,7,9 custodial 143:5 145:21 custody 81:17 145:17 151:16 <hr/> D D 52:1 93:12 96:1 132:1 134:8 139:20 150:1 158:20 188:20 190:25 D1020 70:23 72:17 D1103 133:17 D1399 64:3,6 D1527 93:8,12 95:8 96:5,23 97:10,13 100:24 101:2,2,6,18 102:17 103:12,15 103:16 104:7,14 104:16,24 105:1 105:10 106:7 D1527's 101:15,16 103:5,19 104:22 105:4,12 106:15 107:25 D1538 57:20 58:4 121:7,14 123:5 166:13 167:20 168:20,24 170:14 170:23 D1538's 121:23 123:3,6,12 166:16 D180 43:10 49:11 D1851 110:2 D197's 125:13 D1985 47:24 48:16 D274 163:15 164:5 D313 134:14,18,21 D381 50:20 51:3 51:24 54:2,24 55:9 D390 109:21 110:1 111:10,11,13,24 112:10 113:1,6,8 113:20,21,25 115:7,11 116:20 117:3,16,22
---	---	---	--	--

119:8,11,13,15 119:16,20 140:7 140:9 D390's 111:20 114:22 D4049 49:22,25 D4277 49:6 D668 60:15 62:20 D87 163:7 164:2 daily 11:1 154:10 damage 76:3 Dan 37:17 39:7 53:15,15,17,21 54:4,8,9,11,14,17 55:3,12 135:17 155:19 156:6 dangerous 89:3,5 151:22 Darren 1:4,5,9 43:11,18,25 53:19,24 156:1 191:2 date 83:2 85:16 95:8,16,21 dated 95:14 100:10 142:11 dates 142:19 day 13:22,22 14:2 14:11 15:12,23 15:23 16:18,21 16:22 17:17 24:9 26:2,22 27:22 29:18 31:25 32:3 32:17 33:6 39:20 53:12 58:4 65:3 71:14,19 87:5 88:6,6 89:10,10 94:3 100:11,16 120:24 121:1 122:22 127:8,8,9 128:5 131:23 134:13 162:12 165:4 186:21 188:19 day-to-day 2:19 3:1,17 days 6:17 16:23 23:12 24:24 59:15 78:15	84:18,24 124:13 124:14 128:8,12 128:15,17 143:24 144:19 147:10 DCM 1:22,25,25 4:2,6,10,20 5:9 5:19,19 19:1,13 19:13 22:2 25:17 25:19 46:17 66:18 77:24 78:6 78:9,14,16,19 82:8,13 83:7 84:1,5,6 96:3,3,4 96:7 97:15 98:8 98:10 99:7 101:6 102:1 103:5,9 104:6,22 105:1,8 106:20 110:4,4,7 110:11 111:10 115:4 119:8,13 121:22 123:3,7 123:12 153:20 DCMs 18:23 83:17 88:4,8 97:7 152:17 155:10 DCO 1:22 2:3 3:16 5:17,22,23 12:5 18:25 19:3 25:21 79:11 81:13,14 83:22 84:1 96:2 96:8,21 98:6,12 101:4,4 102:1,3 103:7 104:9,9,23 104:23 105:4,11 105:13 107:11 111:17,17,19,19 112:23,23,24 113:2,3,6,9,13,15 113:16,18,18 114:2 115:4,10 115:19,20,24 116:2,19,20,21 116:23,24,25 117:19,22,22 131:6,7 134:14 135:2 142:18,19 142:22 146:7 164:23 166:20 167:14,20 168:21	168:22,24 169:11 169:19 175:16 184:11 DCOs 24:10,22 83:18 84:14 86:17 87:16,24 88:1,4,16 155:10 155:17,20 183:6 de-escalate 8:24 8:25 112:4 118:11 140:16 de-escalated 121:17 de-escalation 107:3 112:15 116:10,12 118:10 120:3 165:19,25 deal 8:15 9:14,16 12:8,11 16:6 22:11,24 25:4,12 37:14 47:22 49:5 51:22 60:17 64:3 65:24 72:16 108:24 129:15 148:17 156:12,17 160:24 162:6 164:15,20 165:12 dealing 2:25 8:13 8:19 10:24 13:11 26:1 32:15 36:5 54:24 68:8 75:17 108:17 deals 93:2 dealt 64:14 67:3 74:9 79:17 133:11,12 debrief 94:7,9 December 77:2 81:9,9 82:23 decent 47:12 decide 5:3 67:5 99:16 decided 72:1 76:6 decision 4:20 6:11 7:1,18 68:5 93:15 130:16 143:21 decision-making 90:3	decisions 67:6 88:25 90:6 deck 167:18 declined 132:25 133:1,2 deemed 178:19 deep 148:20 defending 39:10 166:25 defensive 168:1 169:15 definitely 49:20 54:18 107:18 128:25 131:15 139:5 172:7 187:17 defusing 52:20,25 degree 109:4 dehumanised 186:2 dehumanising 31:21 deliberately 178:22 delivery 143:11 Delta 150:1 demand 27:15 demeaning 55:24 56:1,20 57:17 denies 67:17 denying 62:16 department 132:18 depend 14:1 21:8 depends 85:24 depressed 21:13 21:20 depth 166:12 derogatory 141:2 184:24 189:14 describe 5:24 7:22 30:9 37:21 43:21 82:12 117:23 118:24 described 30:8 32:5 126:8 134:24 155:20 158:5 181:14 describes 54:8,9	54:11,13 describing 31:3,20 33:11 35:19 72:12 139:2 186:11 description 35:14 52:5 156:6 desk 113:21 167:16 despite 129:4 destitute 29:12 detail 2:14 45:8 47:20 70:24 84:9 170:1,10 detailed 170:8 details 108:10 133:10 144:12 detained 11:22 12:22 19:24 26:11 27:14 28:4 28:11,25 29:8,19 31:3,20 33:12,13 34:5,6,9,17 35:4 37:18,20 38:6 39:24 41:11 46:24 50:24 51:12 58:18 62:2 62:4 67:15 68:15 71:7 75:21 76:18 89:6 109:9 127:15 147:22,23 148:6 152:2 153:19 155:3 156:2 159:20 162:15 163:17,20 164:16 167:15,17 169:10 170:20 171:8 177:24 178:8,22 180:9 184:12 186:13,19 187:9,13,19 189:25 190:7 detainee 7:1 8:16 8:25 22:3 26:19 27:10 33:19 38:9 38:15,19 44:6,10 52:3,18 54:9 59:19 60:9 62:6 62:9 65:17 68:19
--	--	--	---	---

74:6,6,8 81:16 92:3 95:12 96:5 96:5,22 97:10 98:7,10,17 99:3 99:16 102:6,14 104:1,13 108:4 109:10 110:7,8 111:18 115:14,18 116:5,8,13,14 117:10 118:6,11 119:9 121:7,18 123:7,8 129:12 129:13 130:10,20 131:2 138:18 139:2 140:8,16 140:18 162:21 165:2 166:1,2,4 171:23 174:14,14 175:1,10,16,18 175:19 176:16,20 176:21,23 177:1 177:13 179:7,14 186:5 187:4 190:7 detainee's 96:22 100:5 106:17,19 111:8 122:19 123:23 130:18 131:24 171:23 detainees 3:1,18 3:19 6:1,5,15 7:12,24 8:1,3 10:13,23 11:11 11:15 12:3,4 13:4,6,6,7 16:7,8 20:1 22:23 23:19 24:7,24 32:9 34:12 35:9 37:13 41:13,14,22 42:5 42:15 43:11,13 43:14,17 45:14 47:6,8,11,11 48:1 49:11 51:2,8,15 51:16 57:8 59:14 66:8 67:7 69:16 69:21,24 70:1,9 72:2,4 78:25 87:9 129:19 130:19 141:12	147:12 148:6,13 150:14 152:4 153:22 155:23,25 157:25 158:19,24 163:6 164:11 165:6,12 177:5 184:17,22 185:9 185:13 186:2,8,8 189:9,13,18 190:7 detainees' 159:9 159:12 detention 4:8 12:2 13:12 59:5,10 145:17 146:9 151:15 155:21 175:18 187:16 devices 24:9 diaries 26:4 diary 31:25 dick 184:12 186:6 dickhead 27:12 dicks 185:13 die 130:20 difference 2:22 29:22 81:25 150:4 176:14,18 differences 107:9 147:20,24 148:6 different 3:12 36:10 41:18 44:17 53:8 66:17 71:21 72:11 78:14,16 81:7,21 81:24 87:23,24 93:2 100:18 105:18 106:3 107:13 120:25 148:4 151:5,6 163:13 differently 42:15 42:18 62:23 103:25 174:3 difficult 9:21 28:15 64:9,11 65:4 86:7 151:4 dig 37:25 dignity 52:19 53:3 189:25	dinner 160:18 direct 176:12 directing 168:20 direction 68:11 directions 112:3 133:17 directly 22:4 123:20 166:22 director 17:3,4,25 directors 17:23 disappear 57:4,5 disc 168:8 disciplinary 73:22 73:24 74:2,3,12 74:15,16 discriminated 50:23 51:8 discuss 46:1 84:8 84:13 109:22 117:19 124:2 discussed 92:6 129:3 140:6 discusses 106:18 discussion 37:20 53:16 135:12 dislike 90:17 disliked 43:18 dispersed 130:23 dispute 166:20 distress 109:10 distressing 44:1 diversity 52:3 Dix 96:3,4 97:15 98:10 101:1,6,18 103:5,9 104:6,12 104:18,22 105:1 105:8,9 106:6,20 106:22 107:17 122:17 Dix's 99:7 102:12 DL0000231 59:2 166:17 DL000144 106:16 doctor 108:9,16 document 30:17 32:3 34:22 52:14 53:8 102:12 104:3 105:18,24 129:17 132:23	documentation 95:4 166:24 167:12 169:24 documents 62:19 80:16 163:3 167:4 doing 11:10 18:23 20:10 30:22,25 31:19 40:6 41:23 68:6 70:18 76:24 77:7 90:22 116:12 120:3,4 132:6 135:20 150:23 154:11,12 155:14 159:4 179:9 dominant 31:10 Dominic 178:25 door 10:20 96:18 111:9,11,14 112:2,4,17 114:25 115:6 116:12,13 119:7 119:9,12,14 120:4 154:19 163:18 164:6 doors 146:15 186:22,22 doubt 100:9 150:13 151:14 Dove 89:13 108:11 108:13 150:1,1 draft 43:8 drained 144:14,16 draw 151:19 drink 35:17 driver 143:11 dropped 97:12,20 101:13 dropping 123:4 drug 36:4 37:12 180:3 drugs 35:4,5,6,6,6 35:6,9,14,20,21 35:21,23,23,23 35:25 36:5,7,10 37:5,11 86:7,10 86:12,15 87:7,11 180:1,10,17,21	181:1,4,5,7 due 2:14 7:14 10:9 34:9 60:24 85:6 85:16 89:2 101:5 102:19 dumb 27:6 duty 17:3,4,23,25 24:12 97:5 100:5 130:15 131:16 132:6 dynamic 29:4,7 187:1 <hr/> E E 92:12 93:16,22 96:15 98:11 99:14 101:3 106:21 107:1 108:14 109:11,15 165:13 190:25 earlier 77:15 79:7 177:3 179:24 189:7 early 66:2 83:3 earth 48:2 easily 64:23,24 easy 68:15,17 79:20 141:20 190:13 eat 35:17 Ed 172:23 173:9 177:12,15 184:8 184:10 Eden 104:8 109:16 EDL 27:11 Edmond 142:9 Edmund 142:5,7 191:12 Edwards 46:17,18 46:19 51:24 52:15 effect 89:8,9 159:20,21 effective 180:4 effectively 15:11 179:4,17,20 efficient 32:8 effort 25:25 34:9 119:12 efforts 119:20
---	--	---	--	--

egress 170:16 eight 96:24 146:7 eight-week 82:24 146:6 either 15:10 53:22 58:12 65:16 69:21 90:1 115:1 187:23,23 employed 76:12 employment 45:4 45:25 46:23 61:8 142:18 empty 102:25 103:17 128:2 encompass 145:22 encourage 110:8 ended 9:14 24:1 31:17,18 ends 28:8 enforcing 11:19 enjoy 2:9 43:12 90:21 165:8 enjoyable 175:23 enjoyed 2:5 5:23 enter 96:25 97:2 104:6 117:9 118:14 122:11 130:16 entered 11:12 96:22 97:5,19 99:4,4,13 101:1,5 103:25 104:12,23 105:9 106:6 112:11 113:7,19 113:22 114:20 121:19 entering 97:10 104:9 111:18 113:1,5 115:18 116:20 180:22 entire 160:14 entirely 60:7 environment 2:12 5:24 13:8,11,12 13:13 15:24 71:22 72:11 91:14 143:5 145:2 EPE 182:5	epileptic 130:12 equally 10:14 equipped 148:16 error 118:16 escalate 162:25 escalated 105:4 escape 36:14 escapism 36:15 escort 110:2 escorted 69:25 98:11 especially 47:6 165:6,13 essentially 12:21 162:6 established 78:6 estimate 96:25 event 95:21 96:9 119:4 122:18 129:19 events 93:11 100:21 106:3 119:16 121:2 135:1 eventually 2:12 57:4 58:7 63:18 63:19 71:19,25 everybody 67:20 90:25 145:9 everyday 176:19 everyone's 120:8 everything's 40:12 85:10 evidence 1:15 22:22 34:12 57:7 62:3,20 67:8 79:21 80:8 81:1 93:4 120:11,19 141:19,25 142:13 142:14 168:20 189:7 190:12 evident 180:6 ex-prisoners 147:7 exact 84:22 139:7 exactly 37:9 49:14 65:8 84:7 110:11 151:21 162:8 173:2 Examination 1:6	80:11 142:6 191:4,10,14 example 6:19 9:9 10:21 11:2 20:11 22:22 23:20 24:11 26:5 32:10 32:20 35:20 42:9 43:14 63:17 67:7 91:12 110:21 118:14 147:14 152:23 153:16 155:4 174:3 examples 153:6 excellent 161:3 excessive 70:15 128:23 excuse 24:18 148:21 exercise 24:7 25:7 existed 105:19 expectation 155:19 expectations 147:4 147:21,25 expected 83:21 148:5,7 expensive 162:7 experience 9:9 14:7 16:12 17:13 18:25 34:4,8,15 57:11 63:9 68:14 69:19 70:1 79:20 91:4 141:20 143:4 190:13 experienced 10:11 82:14,15,18 83:6 84:2,4 90:21,24 91:2 141:11 146:21 expert 93:6 119:3 120:2 169:1 explained 11:20 27:13 52:18 102:18,19,21 183:20 explaining 119:17 explanation 106:2 183:10 expressed 78:24	expressing 41:8 expressions 121:16 extended 87:20 extra 85:13 extreme 39:15 54:8 169:16 extremely 32:7 43:11 88:14 121:15 167:21 172:6 eye 122:12 144:3 148:11 eyes 149:17 <hr/> F <hr/> face 63:10 111:14 112:17 119:13,14 136:19 139:1 fact 7:9 34:8 46:2 56:1 64:18 72:3 75:21,23 79:2 85:1 106:10 116:24 140:14 153:12 173:18 facts 67:2 failed 140:10 fair 10:16 34:18 64:21 128:6 faith 79:15 fallen 135:10 falling 9:15 103:15 false 48:3 49:9 51:10,11,13,16 59:17 61:6 family 43:24 165:7 far 15:18 17:19 22:25 23:6 39:12 64:1 70:14 74:4 78:4,18 87:24 100:20 113:20 125:20 Farrell 121:22 122:12,15,18 123:7,12,15 125:20,25 128:23 190:16 Farrell's 123:22 fault 159:9,12 183:15	fax 50:3 fear 151:17,20,21 160:2 feared 113:22 fearful 103:1,2 February 49:6 80:22 142:11 fed 112:6 feel 4:3 18:7 61:24 67:4,4,10 73:17 73:18 79:8 108:24 132:5 138:1 144:4 145:16 146:15 150:11,15 151:7 155:11 157:17 161:2 feeling 12:3 14:2 61:2 feet 136:16 138:23 fell 101:12 fellow 4:8 18:12 30:9 felt 9:10 11:3 17:20 18:1,2,8,24 52:20 74:18 77:6 79:18 103:1 129:7 144:24 145:13 147:17 150:13,17,23,24 151:6,14,16 152:20 154:4,21 155:13 156:10 157:21,23,24 161:4 fewer 77:9,10 fibre 142:25 Fiddy 141:23 142:5,7,8,9,17 149:21 168:22 169:11,19 171:17 172:23 173:9,12 175:15 177:12,15 183:16 184:8,10 190:11,19 191:12 Fiddy's 142:13 168:24 field 109:5 fight 51:1,15,16
--	---	--	--	---

125:14 159:7 fighting 113:11 figure 154:16 fill 68:20,21 102:6 filled 71:10 94:20 95:18,20 110:20 filling 12:16 film 176:15,15 filmed 185:17 filming 15:5 final 77:14 188:2 Finally 104:3 106:15 finance 143:9 find 10:12 35:2 56:4 92:20 95:25 fine 11:8 19:16 39:22 78:21 134:9 182:8 finish 100:7 finished 3:25 161:23 fire 140:22 fires 159:7 firm 61:18,20 first 2:5 5:22 22:7 26:7 27:23 36:19 38:2,2,4 41:5 43:2 47:23 51:18 56:25 57:1 61:11 64:9 70:3,9 96:6 98:12,23 99:5 100:21 102:14 103:22 105:8,20 107:11,14,16,18 107:24 112:24 119:5,25 121:12 122:23,24 128:5 128:12 142:17 162:17 163:7 164:3 166:23 firstly 50:20 51:9 fists 97:15 101:10 104:21 fit 130:12 154:8,8 fitness 66:21 five 16:18 25:17,19 69:3,9 88:7 93:20,25 95:11	152:16 157:11,14 162:20 176:4 185:17 five-minute 69:1 fixed 12:24 fled 42:12 flight 6:20,21 7:11 85:6 133:10 flights 89:1 floor 96:6 97:13 98:4 103:15 111:13 123:4 130:11 152:14,15 158:21 floors 89:14,15 focus 81:1 93:3 144:10 focused 91:20 focusing 138:10 folder 80:16,20 follow 10:19 29:15 45:13 78:5 119:10,16 172:16 followed 22:8 76:5 103:10 119:10 169:18 following 11:18 72:18 96:5,22 98:25 101:3 111:17 112:23 116:20 131:23 134:15 follows 169:3 food 153:24 154:1 159:4,16 footage 106:25 107:15 114:7,11 114:14 116:11 117:6,13,14,21 118:19,23 121:25 122:4,13 123:11 123:20 124:6,12 125:6 128:1 137:4,13 139:3 141:6,7 166:7 167:5 168:7 173:22 181:23,24 181:24 force 23:2,4 39:14	43:13 68:25 69:13,15 70:6,7 70:16,16,22 71:2 89:17,22,23 90:2 90:18 91:7,8 92:15,18 93:8 94:5 95:7,10 98:15 99:24 100:1,3 102:6,22 103:3 104:1 105:13,23 106:9 106:10 107:12,19 107:24 109:20 110:5,21,23 112:15 115:2,12 118:19,22,24 119:3,21 120:25 121:2 122:20 123:22 126:17 128:18,23 129:10 129:12 139:24 140:6 150:7,10 150:14,22,24 151:1 152:9 155:2,5 162:13 162:14 163:6,17 165:20,21 166:3 166:6,23,24 167:11 168:25 169:2,21,23 170:7 172:2,11 172:16 173:23 174:1 176:17 177:21 178:5,15 179:6 forced 187:10 form 29:11 52:4 68:20,22 71:10 78:5 95:13 100:8 102:7 110:21 140:7 188:6 formal 4:7 78:7 former 57:8 67:7 forms 12:17 152:16 forth 123:9 fortunate 134:9 forward 68:4 145:8	found 10:24 25:18 45:24 48:5 49:3 66:11 67:9 94:24 168:18,19 173:1 four 25:17,20,22 84:18 88:7 124:14 128:8,12 128:15 fourth 128:5 Francis 155:23 free 67:5 138:1 186:16 frequency 166:9 frequently 90:2,12 92:18,21 fresh 23:21 25:6 25:14 130:1 Friday 188:6 friend 30:21 135:8 friends 25:10 43:23 104:15 frisked 61:1 front 56:11,19 57:9 59:14 80:16 80:20 110:16 127:19,25 134:24 140:18 154:20 161:16 163:19 173:3 184:22 frustrated 27:23 32:13 frustrating 56:7 frustration 39:5 72:14 frustrations 28:8 fuck 35:5,21 136:7 173:10 174:13 175:1,11,19 176:18 fucking 26:22,25 27:4,8,11 30:4,13 30:25 31:2,2 33:13 34:17 35:5 35:6,23 36:8 37:24 38:3,4,12 38:23 39:14 41:4 41:5 43:1 44:23 49:18 51:18 54:6 54:12 55:5,6,14	62:5 136:8 167:18 172:20 173:7 177:12 full 1:7,12 78:19 80:14,23 99:13 142:8 fully 99:17 funny 173:1 further 2:10 18:9 110:10 113:5 114:25 116:23 119:11 133:1 135:12 141:16 152:18 fuse 32:6 future 144:7 <hr/> G <hr/> G4S 46:1 58:11 76:7 133:19 134:15,25 143:12 158:13 180:14 gallery 183:24 game 39:25 40:10 gate 147:2 gatehouse 149:8 gathering 111:13 gauging 21:9 gay 57:24 58:14,19 58:20 59:7,19,20 60:5 Geezer 53:18 general 15:23 23:10 68:25 69:14,15 89:20 109:9 161:10 176:2 179:19 185:8 generalised 42:1 generally 9:23,25 65:15 66:15 70:4 70:4 89:8 91:12 91:23 94:6 97:2 146:9 155:7 161:11 185:9 186:22 gentleman 54:3 122:17 gentlemen 96:9 genuine 20:17,21
--	--	---	--	--

21:1 getting 7:24 10:16 29:18 33:13 34:17 40:6,19 64:18,19 75:22 78:7 86:8 87:8 99:6 115:8 159:10 167:14 girl 27:4 30:4,13 62:5 girls 41:5 43:1 give 1:7 4:10 12:25 19:17 23:20 34:24 40:24 80:14 83:2 87:2 111:10 115:11 119:13 140:12 142:8 150:3 153:6 162:23 178:15 182:3 190:12 given 3:9 16:16 27:15 28:20,22 33:7 45:19 48:19 57:25 66:22 67:7 69:16,22 70:2 73:11 87:21 94:11 97:17 111:14 112:22 118:7 154:9 167:6 gives 114:22 giving 8:22 55:12 112:3,12 116:6 117:2 141:19 glad 161:18 go 7:24 11:2,5,8,15 18:9 23:20,24 24:14,15,24 25:2 25:6,7,9,11 31:12 32:3 35:16 40:2 40:3 43:16,25 44:4,20,23 49:7 49:18 50:22 53:19 55:21 56:3 56:11,18 57:9 59:6,12 61:13 65:14,15,15 68:9 68:10,22 79:8,16	80:24 81:23 82:8 90:10 93:22 94:6 94:14 95:12,24 97:9 99:10 102:11,20 104:14 104:15 106:21 107:1,8 108:1 109:4 110:17 112:6 113:15 114:9,16 118:25 121:13,24 123:10 127:4 130:10 131:9,23 132:10 135:5 143:15 144:1 147:8 148:19 149:5 150:4 151:24 163:14 166:7,11 166:12 177:8,16 183:17,19,20,23 186:16 187:24 God 188:11 goes 39:17 43:21 101:13 104:25 132:21 going 6:12 10:6 14:20,21 15:13 15:15 18:5 20:14 20:19 24:16,19 25:25 26:14 28:12 32:3 38:14 38:22,22 40:13 43:8 44:12 45:4 47:18 50:22 53:14 55:23 60:4 70:23 73:4 76:4 86:16 91:18 93:6 93:16 97:6 98:18 104:4,15 109:20 117:17 122:11,22 136:5,7 140:17 144:21 145:25 147:4,5,22,23 164:25 166:18 167:18 169:6 172:17 182:12 187:25 190:15 gonna 136:25 good 1:3,7 5:7	47:5 52:20,24 80:12,13 90:20 128:19 134:23 136:10 137:22 138:7,9,14,19 139:13 141:10 144:19 160:21 165:15 179:23 gossip 79:12 gossiping 18:5 gossiping 79:13 gotta 136:13 gotten 47:15 governor 135:11 grab 166:23 169:17,19 170:19 170:23 172:5 grabbed 104:22 105:10 168:5 169:13 170:14 171:8,18 grabbing 107:6,7 169:7,9 170:15 171:19 grabs 127:14 grades 83:15 grateful 141:20 great 40:15 160:1 190:2,3,6 Grenfell 137:16 140:22 grievance 156:25 ground 8:24 9:11 28:11,13 39:10 39:17 130:20 143:1 group 29:17,19 47:8 guess 143:23 145:2 145:3,3,4,4 154:11,16 156:22 157:21 161:1 162:23 165:13 166:5 170:21 171:19 172:3,8 175:6 178:18 180:11,12 186:15 190:4 guessing 95:17	146:17 guided 123:4,6 guidelines 151:2 guy 92:14,24 124:16 127:14,14 137:3 guys 163:1 gym 81:16,20 87:24 <hr/> H <hr/> habit 79:10 half 143:13 149:22 half-hour 81:25 halfway 73:6 100:22 110:6 122:25 128:4 hand 91:20 94:16 94:20 104:16,22 107:4 123:1 131:24 132:3,10 132:11 134:18 151:3 168:13 handcuff 103:10 handcuffed 101:18 handcuffs 95:11 98:10 99:8,10 107:25 handed 188:6 handing 82:10 103:6,20 handle 163:18 164:6 hands 71:3,7 102:5 102:23,25 103:16 169:12 177:12 179:3,10,21 happen 24:4 130:2 132:8 160:9 185:11 happened 6:22 12:23 18:20 31:15,17 39:18 41:14,17 65:1 67:16 100:11,12 100:16 103:23 104:13 111:1 120:23,25 124:9 127:6 129:5 130:14 131:11,18	132:19 137:16 157:5 happening 97:9 126:6 133:22 happy 83:14 hard 32:8 98:1 144:7,10 159:8 160:17 176:4 182:17 harder 159:6 168:5 harm 99:22 harsher 13:9 hate 125:2,2 173:9 173:9 hated 126:12 have' 53:23 head 19:7 30:25 58:16 59:22 88:13 98:7,13,24 101:15,20 105:4 105:12,12,13 107:25 121:23 122:19 123:8,9 123:12,16,18,20 123:23 124:22 125:4,6,21,25 126:8,12,15,17 126:20,22,24,25 126:25 127:1,2,3 127:17 129:6 131:2 170:14 headache 131:12 health 19:24 22:16 22:19 23:5 108:7 108:18,22,25 164:17 165:9 healthcare 21:14 21:17,21 22:1,2,4 36:19,21,23,25 37:1 hear 15:17 79:21 97:1,8 135:8 137:15 138:11,22 139:6 142:7 145:9 163:9 172:19 182:17 183:6,22 185:4,7 186:1 190:15
---	--	--	--	---

<p>heard 14:4 17:11 22:22 30:6 31:8 34:12 57:7 78:25 93:11 103:13 133:22 139:7 140:2,18 141:13 155:17,21 156:3 hearing 1:3 96:22 139:3 155:18 190:21 heated 50:6,7 height 92:1 held 105:2 111:7 help 6:1,6 12:10 12:16 22:12 89:25 98:14,23 100:19 108:16,24 117:15 156:12 159:1,8,13,14 160:1 166:1 173:5 helped 87:14 109:6 136:19 138:25 helpful 22:10 149:1,14 helping 120:21 159:4 hide 55:23 high 70:25 88:19 88:23 89:24 109:10 higher 132:18 153:20 highlight 169:16 hindsight 149:15 history 103:2 hit 123:16 hitting 123:18 HMP 92:13 hold 41:3 104:22 105:10 106:6 107:25 123:4,6 123:12 127:14 151:3 169:11 holding 107:17 123:1 177:12 holds 151:2 home 12:16 20:12</p>	<p>20:14 33:25 34:14 41:16,18 44:15,15 46:1 68:23 83:17 85:24 100:12 147:9 honest 87:2 88:10 105:16 117:5 154:22 155:1 hopefully 34:23 horrible 37:21 172:25 173:1 hospital 36:22 151:24 152:6 hour 24:14 120:12 hours 66:2 81:24 84:15 85:13,20 94:12 101:1 144:17 147:10 house 1:19 2:20 3:5,10 7:1,21,23 9:22 12:5,20 13:7 14:5,17 15:19 16:12 30:11 31:11 34:3 36:8,13,16 41:9 41:11,23 42:5 50:25 57:11 61:9 63:7 71:22 74:19 75:5,10 76:1,1,7 77:6 81:6 82:22 84:8 88:14 91:3 91:5 92:13 130:6 142:18 143:5,7 143:19 146:4 148:1 174:23 178:25 179:6 180:3,22 181:5 183:2,7 HR 157:7,9,19 158:4,7 Huh 136:11,22 human 118:16 186:9 humans 186:3 humiliated 61:3 humiliating 28:25 154:22 hurt 20:14 21:14</p>	<p>21:20 150:16 hypothetical 160:9</p> <hr/> <p>I</p> <hr/> <p>ID 11:18 idea 4:14 5:5,18 48:7 49:11,13 59:24 63:1 72:23 92:23 126:1,4 161:24 180:11 identified 58:1 137:7 idiot 35:6,23 184:20 idiots 36:8 ignore 111:14,18 112:11 113:1,8 115:18 116:21,22 140:13 ignored 113:6 114:4 117:3,16 118:7 140:8 ignoring 113:12 115:21,23,24 116:2 118:13 illegally 40:4 illustrates 121:1 imagine 17:1 56:7 118:22 immediate 115:22 immediately 97:13 111:11,15 116:18 117:9,10 119:15 123:2 125:23 immigration 11:23 12:9,14,15,21,23 33:20,23 133:17 impact 23:19 71:17 75:6,12 important 25:13 28:10 37:14 79:21 83:15 170:6 inaccurate 44:3 inappropriate 35:8 55:15 inaudible 26:23 125:3 126:12 127:12,13 136:8 136:9 177:10,16</p>	<p>177:18 188:18,19 188:20 incident 51:24 59:3 64:12 70:22 70:24 71:10,11 72:17,18 73:3 76:6 91:7 93:18 93:19 94:5 100:25 102:9,10 108:1,8 109:21 109:24 111:2 117:1 120:22 121:7,14 123:22 124:2 126:4 127:9 129:10 130:8 131:18 132:12 134:10,13 138:16 140:2 156:15 159:2 163:11 164:3,5 166:11,13 167:11 168:10 170:2,7 170:11,16,18 176:7,9,17 177:21 178:19 incidents 91:8 92:16,18 93:1,3 94:5 141:3 152:9 155:2 162:13,14 162:16 163:6 164:8,10 169:3 174:1 179:6 189:8 include 13:4 included 25:20 44:17 71:13 including 163:11 176:8 incredible 40:18 incredibly 148:11 indefinite 147:15 independent 111:1 indicate 179:5 indicating 163:21 individual's 133:10 individuals 21:13 21:19 90:4 148:15</p>	<p>induction 6:10,16 6:18 7:2,14,15 57:2 146:2 industry 132:9 influence 143:20 information 18:8 143:18 166:10 informed 92:12 132:12,16 133:9 133:15 ingrained 174:22 ingredients 188:7 initial 37:9 119:23 139:17 150:20 177:10 initially 76:13 137:7 injured 131:11 151:23 152:1 injuries 94:10 152:6 INN000018 71:12 INN000024 1:11 innit 27:6 INQ000088 179:1 INQ000111 119:5 169:4 inquiry 1:11,15 43:7 49:11 59:1 62:21 67:14 80:22 92:7 93:11 105:17 142:11,14 155:17,23 167:5 169:2 inquiry's 119:2 insensitive 141:2 inside 96:12 101:15 129:22 131:9 insights 153:18 insinuate 171:20 installing 142:25 instance 163:2 instances 164:12 177:4 instantly 150:19 institutionalised 145:3 Instone-Brewer</p>
--	---	---	---	--

166:20 167:14,20 168:21 190:16 instructed 111:15 116:18 instruction 114:3 117:16 instructions 111:10,14,18 112:11,12,22 113:2,5,8,13 114:22 115:19,22 115:24 116:2,6 116:21,22,23,25 117:2 118:8,13 140:13 insulting 97:15 intending 74:22 intentions 83:12 interaction 17:12 33:11 interested 76:16 interesting 2:4 interfere 133:16 interpreted 175:20 interview 32:2 135:2 178:24 179:16 interviewed 4:21 5:8 58:9 61:7 63:4 74:10 intimidated 61:3 intimidating 7:23 15:24 intimidation 9:20 11:1 32:16 introductory 23:1 invasion 168:23 invented 60:7 investigate 46:20 66:22 investigated 49:3 51:25 52:16 58:7 68:14 investigating 66:19,25 67:18 68:8 77:25 investigation 58:12,15 68:2 73:5,23,25 74:5	74:13 78:3 134:15,25 involve 175:9 involved 3:2 4:19 25:16 32:25 67:21,23 73:22 81:22 88:25 90:18 91:19 93:5 93:18 102:9 108:8 109:21 111:2 121:2,7,23 134:14,20 155:5 163:5 166:12 involvement 94:1 99:7 involving 70:22 164:5 166:13 issue 13:19 18:1 19:24,25 36:17 37:10 50:4 55:18 66:5,17,21 79:12 134:7 153:7,12 153:24 158:23 160:6 162:22 174:2 issued 58:3 issues 1:18 9:17 12:14 16:14 17:20 26:2 37:12 47:21 52:21 81:2 108:18,25 153:22 159:25 161:8 164:17 ITC 82:24 108:19 items 163:10 J January 1:20,20 61:8 job 2:18 4:9 8:18 32:9 68:6 71:23 83:14,19,24 91:3 91:20 99:1 120:3 120:4 128:19 132:6,6 145:19 147:4 150:3 154:13 155:6 158:9 164:23 jobs 76:22 Joe 172:13,15,18	172:25 174:8 177:14 184:5 188:12,19 jog 109:24 jogs 107:20,23 John 80:10,15 142:5,9 191:8,12 Jon 120:2 169:1 judge 65:5 Jules 152:23,25 154:3,5,15,24 156:25 158:4 jump 32:25 93:21 jumped 93:12 jumper 61:22 jumping 21:11 100:24 June 26:8 53:10,12 57:23 59:4 60:21 61:12 109:22,25 120:22,24 134:13 134:17 166:14 181:13 justified 27:19 167:7 172:9 justify 30:3 K keep 18:10 25:3 26:2 63:19 122:12 158:11 keeping 11:4 46:15 KENCOV1029-... 181:25 KENCOV1031-... 122:2 KENCOV1036-... 138:3 kept 6:9,20 46:9 50:2,2 88:20 177:11 kettle 111:12,24 113:21 115:8,14 116:14 117:11 key 81:1 keys 146:15 160:8 kick 91:15 kicking 127:12 kiddy 127:12	kids 41:4 killing 173:6 kind 3:2,15 9:15 44:10 47:13 74:24 76:15 83:25 87:22 108:17 145:22 149:2 153:22 156:20 164:22 174:24 183:6 184:16 185:7 186:5,7 187:18 Kingdom 42:2 44:13 kiss 54:11 kit 90:10 kitchen 188:5 kitted 179:8 knew 42:9 58:12 68:10 76:17,21 86:12 144:20 know 2:7 3:3,6,8,9 3:21,22 5:5,15,15 6:22 8:14,16,17 8:19 9:5,17 10:10,20 12:7,10 13:10 14:1,6,10 14:20 18:8 19:21 20:5,9 23:10,12 24:12,13 26:20 26:22 27:23 28:8 31:13 32:15,18 34:2 35:24 36:14 37:13 39:9,12 40:7,22 41:4,24 41:24 42:7,17,17 43:10 44:10,12 45:9 46:4,14,14 46:16 47:24 48:3 48:22 50:12 52:10 54:21,21 56:6 57:20 60:6 60:15 63:18 66:6 67:22 68:8 70:23 71:20 73:20,20 75:13,15 76:19 83:25 86:6,11 87:25 88:1 90:3 90:4,6,15 93:20	101:25 103:18 105:17 106:12 108:7,10,15 111:2 121:19 124:3,25,25 125:5,15 127:11 127:19,24 128:14 133:13 134:6,25 135:14,14,17,25 141:19 143:25 144:1,14,15 145:6,11,19 146:16,19 147:7 147:13,15,18,19 149:5,8,10,16 150:5,12,16,16 150:18,19 151:3 151:3,8,15,20 152:3,4,4 153:11 153:15,20,24,25 154:8,11,11,12 154:16,18,18,19 155:7,14 156:11 156:13,23,23 157:10,17 158:9 158:14 159:2,2,3 159:6,10,13,15 160:6,7,8,18,25 161:1,21 162:6,8 162:22,25 163:1 163:19,22 164:13 164:14 165:4,5,6 165:7,7,14,17,17 166:6,6,9,9,10 168:13 170:25 172:9,21,25 173:5,14,15,15 173:15,18,24,24 174:5,5,6,8,10,18 174:19 175:6,22 175:24 176:4,11 178:13 179:9,10 179:11,21 180:13 180:13,17,23 181:3,6,8,8,9,21 182:24,25 184:19 184:20,21 185:9 185:11,20 186:12 188:5,18,20,21
---	---	---	--	---

189:19,20 190:5 knowing 79:9 105:7 knowledge 87:11 92:11 93:19 96:16 105:15 108:1 113:10 114:24 117:4 126:4 137:21 138:16 known 92:14 96:14 109:7 knows 106:25	143:22 146:24 148:23 157:22 160:3,4 183:25 187:8 leaving 157:21,22 led 113:18 left 1:25 24:8 61:2 61:8 80:18 82:7 82:16 83:6 95:23 95:23 98:8,13 100:8 101:17,21 103:10 111:21 122:16 123:1,3 143:7,19 146:22 168:3 left-hand 122:11 legal 33:25 146:8 149:6 legally 40:4 151:11 legs 61:25 lengthy 71:10 Let's 177:8 letter 52:15 137:8 letting 11:2 23:24 level 70:25 96:2 105:3 118:19,24 levels 23:8 88:11 88:13 89:9 158:3 158:15 library 68:21 135:18 lieu 85:14,15 life 3:5 44:1 64:9 64:11 84:8 135:24 144:8 149:4 lifting 134:19 ligature 163:8 164:4 ligatures 166:5 light 65:22 66:2 liked 141:11 likes 97:8 limited 94:16 line 1:16 4:10,14 19:3,15 27:1 28:14,16,18 35:20 37:25 41:1 88:9 99:11	113:17 152:18 158:13 172:17 184:5,14 lines 26:24 27:3,5 27:7 37:22 104:5 104:14 128:3 180:15,20 188:3 link 86:1 list 163:19,20,25 163:25 listen 27:8 113:21 listening 137:19 literally 68:1 115:6 126:21 136:16 138:23 156:4 159:7 little 71:24 95:22 145:12 149:18 189:7 190:5 live 40:23 145:9 living 143:8 Livingston 1:3,6,7 1:14 68:24 69:3 69:7 77:13 78:1 79:25 191:4 location 111:8 lock 43:19 85:7 89:15 161:13 lock-up 24:9 81:22 89:14 locks 98:9 99:8 101:17 105:2 116:6 London 122:7 123:3,17 long 5:14,15 7:19 19:21 38:15 68:6 80:1 85:5,24 114:9 115:13 117:4 129:25 147:18,19,22 148:5 177:6 189:11 longer 81:18 look 9:5 10:7,15 35:5 41:4 46:11 65:14 80:19 95:4 100:21 110:14 111:4 122:1,19	146:14 169:2,3 looked 8:8 46:5 55:25 56:1 57:24 58:14,20 59:7,19 59:20 60:5 104:17 127:10 145:20 146:13 looking 27:18 36:2 50:1,3 52:24 54:10 57:16 77:8 102:23 112:20 121:15 129:15 137:13 154:14 160:21 166:22 175:22 190:5 looks 9:15 12:2 54:22 98:11 99:2 128:10 171:18,19 171:25 179:22 184:19 loose 63:6 lorry 40:5 losing 32:14,20 53:24 79:3 lost 32:7 39:4 53:6 54:13 64:23 76:21 78:23 lot 10:25 13:6,7,9 13:17 15:23 18:4 25:25 30:22 31:11,16 34:12 34:13 47:5 50:13 56:2 81:21 87:11 106:19 146:22 148:22 149:24 151:22 152:1 153:16 156:3 161:18 164:13 180:24 181:2 190:6 lots 42:9 59:14 93:2,3 121:2 loud 101:5 157:20 love 172:23 173:18 174:9 low 14:9 85:25 86:4 89:8 luck 151:19 Luke 167:21	190:16 lunch 120:8,9,12 120:21 <hr/> M <hr/> M 103:7 ma'am 78:4 79:1 machine 50:3 macho 30:8,10,15 155:20 156:7,18 156:21 main 149:8 maintain 10:22 28:16 maintained 156:17 maisonette 40:20 majority 190:3 makeshift 160:10 making 26:7 37:3 60:2 67:6 88:25 105:8 173:16 male 135:9 136:10 136:13,20 137:6 137:11 man 27:6 30:10,14 53:25 102:2 122:10 136:20 137:5 138:6,8 154:22,25 155:18 155:20,22 156:3 156:20 managed 26:2,3 management 4:10 6:11 16:14,16,17 16:25 17:12 18:6 18:18,23 19:17 83:12,13 86:18 139:11 152:11,18 152:19 153:7,8 153:13,23 161:25 manager 4:8,14 17:2 18:14,18 19:3,15 25:15 46:17 64:15 68:3 68:10 73:7 79:4 79:11 88:9 90:8 112:3,14,20,21 129:3 145:22,23 153:20 155:9 manager's 120:3
--	--	--	--	--

managerial 7:1	144:5,13,15,18	103:13,14 108:13	131:14	mouth 79:14 98:19
managers 25:12	144:25 147:18	110:13 122:23	Mmm-hmm 45:7	98:20
88:7 155:19	152:1,2 154:17	164:1	moaning 27:6	move 11:17,24
161:19 162:3	159:17 166:3,6	mentioned 112:8	33:12 161:11	43:5 68:4 83:6
managers' 157:19	170:5,15,21	114:19 144:24	mobile 97:23	91:9 145:8,12
managing 145:23	171:18 173:20	154:3 161:9	mocked 59:15	152:10 158:15
manner 60:23	174:18 175:22	mentions 107:6	Mohammed 96:2	184:13
61:15,17 97:3,14	176:7 177:10	mercy 29:1	104:9 106:24	moved 6:17 13:12
101:10 118:12	179:18 180:6,25	met 25:10	moment 91:14,18	66:8 109:11,14
MAR000002	181:7	Michael 96:3,7	91:24 102:23	109:15 111:14
142:16	Meaning 133:3	98:8 106:20	144:24 152:10	112:17
March 1:1 190:22	means 1:14 50:16	107:7	158:3 168:12	moving 7:7 19:24
marching 167:21	80:24 120:10	Michelle 17:7	171:5 182:3	66:17 83:12
Marshall 172:13	126:21,25 133:1	152:24,25 162:4	momentarily	105:3
172:15,18,25	183:21	162:5	169:18 183:14	
174:8 177:14	meant 23:20 33:19	microphone 145:8	Monday 1:1	N
184:5,11 188:12	127:24 138:9	mid-morning	money 41:16,18	N 190:25
188:19	153:22 173:18	79:25	42:3 43:23 90:22	naive 145:21 148:9
marshalling 131:8	183:24	middle 2:16	monitor 24:1,3,5	154:7
masculine 30:8	mediate 131:25	161:24 169:6	24:11,14,23	name 1:8 80:14
mask 69:8 77:15	136:6,7	midnight 85:2,16	monitoring 129:19	92:1 95:14
massive 181:8	meet 90:11	85:22	monotonous 145:4	101:14 110:17
matching 147:25	meeting 132:14	mightn't 60:5	month 65:2 73:19	122:21 127:23
mate 26:22 35:5	161:15,16 162:2	mimics 177:12	87:1 151:9	142:8 162:19
38:1 40:7 124:25	meetings 161:12	mind 10:4 53:10	months 25:17,17	164:1
136:25 137:3	member 50:5	67:1 141:5	65:4 76:11	names 36:3 106:25
173:4 184:15	67:16 84:2	minute 182:13	161:12 185:17	163:20,24,25
188:9,22	members 17:12	minutes 16:18	mood 173:6	nasty 43:11
mate' 38:5	90:17 152:5	69:3 80:2 95:11	MOORE 80:8,11	nationality 52:21
mates 125:13	153:7	96:24 114:9	80:12 114:14,16	naturally 154:10
matter 35:12 40:3	memory 102:4	138:4 141:24	114:19 120:6,19	154:16
42:23 43:2 79:11	107:20,23 109:25	152:16 157:12,14	122:6,15 138:6	nature 95:10
131:25	115:13 121:12	158:10 182:7	141:23 191:10	nearest 169:13
matters 93:2	130:1 131:17	misconstrue 44:18	morale 13:22,23	nearly 121:23
maximum 6:17	137:24 174:18	misconstrued 44:7	13:24 14:5,6,9	necessarily 29:10
147:10	men 50:14 115:1	misery 38:3,12,23	85:25 86:3 87:14	65:11 78:17
me' 173:6	mental 19:24	39:15 51:19	89:9 160:22	79:15
meal 160:15	22:16,19 23:5	misremembered	161:6	necessary 11:21
mean 8:12,20,20	108:7,18,22,25	124:5	morning 1:3,7	35:3 71:2 110:23
8:21,22 13:14	109:9 144:6,13	missed 127:7	43:19 66:2 79:22	119:24 163:4
14:25 24:21 44:8	164:16 165:9	misses 136:2	80:12,13 85:17	166:14 170:10
54:21 56:10	188:20	missing 66:12	153:5 156:1	necessitate 98:15
67:25 68:17	mentally 143:23	mistake 97:13	162:18	necessity 110:23
69:21 74:1,12	144:14,16 148:16	121:24 135:24	Moroccans 184:8	neck 71:4,8 125:12
82:15 85:4 86:9	156:13 160:6	mistaken 118:8	mortgage 143:9,17	126:2,9 129:6
89:13 90:20	163:6 165:12	mistreating 76:18	motherfucker	163:8 166:24
101:22 118:22	173:8	mistreatment	167:16	168:5 169:7,9,16
120:2 125:15	mention 10:8	14:19,21 15:15	motion 123:2	170:14,20,24
126:16,20 138:17	57:13 89:18 91:6	Mmm 14:22	169:17	171:8,24 172:6
				need 25:14 26:4

35:16 66:12 68:9 71:11 81:4 96:11 102:19 119:5 121:13 124:12 129:18 132:23 135:1 157:25 158:10,11 174:3 183:14 needed 5:16 8:10 12:9,15 37:3 52:4,10 56:2 57:23 63:24 96:11 100:2,4 129:7 139:24 146:10 156:12 158:9 159:1,3 172:11 183:17 needs 33:24 62:14 170:4 negotiate 140:8,10 negotiation 107:2 nervous 146:20 150:2 netting 93:12,13 93:18,19,21 96:6 100:24 102:15 never 11:20 18:20 38:19 44:6 49:9 49:16 51:2 59:19 60:6 62:2,5,7,9 64:10 70:18 71:4 72:24,25,25 74:16 120:2 141:9,13 148:9 150:17 151:6 176:21 178:23 186:10,10,10 new 7:12 12:4 27:15 30:21 135:8 146:23 150:3 188:18 news 137:15,17 138:12,13 139:15 nice 3:21 157:12 157:14,15,16,20 185:4 186:1 Nick 122:7 123:3 night 28:1 43:20 nights 85:1	nine 76:11 no-one 57:14 66:24 87:12 160:5 179:9,10 Nobby 136:5 noise 157:20 non-compliant 113:11,14 normal 31:8 72:9 112:7 159:22 175:5,8 176:10 176:15 normalised 175:6 176:2 177:7 185:10 188:1 189:19 normally 6:14,14 6:16 25:21 29:11 29:12 88:6 91:21 94:12 105:21 116:3 note 50:5 112:22 noted 48:12,16 notes 51:4 52:17 notice 77:1 82:10 noticed 111:11 notorious 108:5 notoriously 152:12 November 57:8 82:11 number 22:22 45:21 63:1 66:22 87:2 88:19 92:6 95:18 100:17 116:3 126:23,23 142:16 numbers 146:11 nuts 54:6 55:5,13 nutter 54:12,13 <hr/> O <hr/> o'clock 120:6,9,14 observations 165:16 observed 50:6 observing 4:8 obviously 11:21 26:12 33:7 62:24 64:16 68:12,13 81:21 90:24	91:13,24 93:20 93:24 95:7,15,20 96:24 98:18 101:25 103:24 115:13 127:22 129:25 130:15,22 133:2 141:7 159:3 162:10 166:6 173:4 187:16,24 190:18 occasion 25:18 28:17,19 54:9 64:25 65:1 73:24 78:23 94:21 129:7 189:18 Occasionally 86:23,24 occasions 23:21 25:23 47:14 134:4 185:16 occupants 7:4 occurred 166:14 occurrence 134:1 134:3 159:22 165:21 October 47:25 142:20 143:19 161:23 odd 28:17 offensive 141:2 189:3 offered 83:7,24 131:19 office 12:16 20:12 20:14 33:25 34:14 38:5 43:22 43:25 46:1 50:4 68:23 94:22,23 143:2 147:9 152:14 159:15 office/admin 143:1 officer 18:6,12,19 24:2,5 37:10 52:6 57:23 58:1 59:5,10 81:16,17 98:25 107:12,16 107:18 116:4 120:5 123:8 125:4,6 126:12	126:16,17,17,18 126:20,23,24 127:1,3 133:13 135:9 136:10,13 136:20 137:6,12 141:11 145:17 153:17 155:13 156:11 162:21 175:19 officers 29:1,9,17 30:9 43:18 67:9 67:11 78:13 82:3 82:14 84:4 88:16 89:12 101:16,20 101:22,22 103:7 103:9,21,24 106:19,22 113:19 115:15 127:1 130:15 133:19 151:16 155:22 162:7 180:17 188:18 officers' 105:20 offices 157:19 officially 84:6 oh 35:9 39:22 75:14 78:18 159:24 161:17 187:17 188:11 okay 3:14,20 4:19 10:8 16:4,24 34:20 49:1 53:22 69:9,12 74:16 76:3 77:18 78:12 164:7 oncall 17:1 once 17:10 65:2,3 65:3,3,4 98:9 99:13,20 103:7,9 103:21 111:9 114:25 116:6 119:7 151:4 one-off 189:17 ones 109:18 125:14 onus 146:8 151:7 onwards 109:22 109:23 open 21:24 22:5,7	24:6,21 25:3 67:1 81:2 96:18 114:17,18 119:12 122:1 138:3 182:20 183:17,19 opened 57:1 114:25 119:14 149:17 186:22 opening 115:7 144:3 148:11 OPERATOR 182:5 opinion 151:12 172:10 179:22 opinions 54:22 opportunity 32:25 69:16,22 70:2 115:11 118:7 119:11 opposed 5:19 71:22 169:18 171:21 option 169:8 order 57:6 110:1 119:18 orderly 52:3 organise 145:20 organising 84:3 outcome 48:12 52:15 outside 23:20,24 24:23,25 25:11 96:4,10,11,17 103:14 104:10 105:8 116:10 129:23 146:13 overall 13:20 42:20 86:4 overheard 138:15 overly 3:5 overspeaking 82:3 overstepped 28:17 overwhelming 147:3 owned 50:25 <hr/> P <hr/> pack 26:23 packed 61:14 page 26:9 30:17
---	--	---	---	--

33:6,7 34:22,23 34:24,25 37:16 40:20,25 50:22 51:4,6 52:14 53:9 54:14 59:2 59:4,12 82:12 84:11 88:11 89:19 91:6 92:10 95:12,24 99:11 100:19 102:11 104:4 106:16 107:8,15 108:4 109:22 110:16,17 110:18 111:4,4 113:15 116:16 121:4 122:21,23 124:12 127:4 135:6 140:23 168:18 169:5,6 177:9,9 179:1,2 180:20 181:12 184:4,4,14 188:4 pages 39:20 93:10 129:16 166:17 167:10,12 172:14 172:17 188:3 paid 26:5 29:18 40:6 84:1,6 85:12 186:17 pain 177:17 178:2 178:4,8,15,16,22 painted 3:4 pane 109:18 panel 77:20 112:4 112:8,10 191:6 Panorama 14:16 14:21 15:6,20,22 16:2 70:20,21 73:18 75:4,9,16 75:21,24 76:8 82:7,16 83:3 143:20 paper 163:23 paperwork 93:17 102:2 paragraph 2:2,17 5:25 6:9,19 7:22 8:9 12:1 13:1 14:14 16:15	17:16 20:1 21:12 23:8 33:18 35:7 38:20 47:22 49:5 49:21 51:23 59:13 63:5 64:4 64:10 69:14 75:4 75:9 81:4 82:11 83:20 84:10 86:2 89:18 95:25 99:12 100:22,23 102:13,14 109:23 111:5 116:16 119:6 122:25 129:17 146:1 167:4 169:5 189:24 paragraphs 23:18 60:18 71:1 73:21 88:12 93:10 121:6 149:1 150:8 152:12 154:4 166:18 180:2 parcels 180:12 Pardon 118:20 part 3:23 34:10 39:22 52:15 53:13 58:9 86:1 100:8 106:1 132:6 144:2 162:20 163:16 190:1 part-time 143:10 Partially 143:22 participants 69:8 participating 91:8 particular 23:3,12 29:15 47:16 73:3 78:11 91:7,11 121:13 130:8 142:18 152:20 162:1 164:19 particularly 30:12 37:7 46:13 51:3 88:19 90:17 123:22 160:15 parting 18:7 partly 53:13 Paschali 92:7	passage 33:8 passed 151:11 pat-down 61:19 patience 32:14 39:4 pattern 64:19 145:14 patterns 84:13 pause 122:4,6 161:20 168:12 171:14,17 182:2 183:13 pay 83:15 paying 40:7 139:4 140:20 141:14 PDR 19:22 pencil 123:1,4 pending 73:4 133:11 penis 184:12 186:6 penises 185:14 people 2:4 4:14,19 5:24 6:9,24 7:13 7:19 11:2,22 12:19 13:2,11,17 17:5 19:25 22:12 22:12,24 25:10 25:14 28:4,11 29:4,8,19 30:7 31:20 34:5 35:25 36:4,7,12 39:1,24 40:23 41:11 42:23 43:3,15,19 43:19 46:24 50:24 51:12 52:8 55:9 56:22 58:18 62:23,24 63:9 66:14 68:15 75:22 76:18 79:10,12 80:1 82:16 83:5,6,16 87:7,15,15,19 88:2,18,20 89:6 89:10,11 90:12 92:6,17 93:5 108:17,22,25 109:4,9,14 140:3 140:24 142:25 146:22 147:7,16	148:22 151:23 152:1 153:21 154:12 159:1,3 159:24 160:19 161:4,9,17,19 162:21 164:19,20 165:13 166:7 179:4,17 183:22 188:21 perceived 31:23 70:12 performance 19:18 period 46:13 47:19 50:19 70:25 78:20 84:14 86:1 86:3 88:14,20 94:20 108:11 115:21 117:2 129:15 139:21 146:6 periodically 19:20 periods 81:7 87:20 perks 90:22 permanent 83:6 83:10 person 26:12 27:14 28:25 31:3 35:4 37:18 38:6 62:2,4 67:15 114:23 126:21 127:15 147:23 148:10 156:2 163:17 167:15,18 169:10 170:20 171:8 172:5 175:15 177:24 178:8,22 184:12 187:10 person's 37:20 67:17,24 71:7 personal 74:3 167:23 168:24 personally 22:21 79:18 106:4 123:24 151:20 156:12 persons 152:2 153:19 155:3	159:20 162:15 163:20 164:16 180:9 186:13,19 187:13,19 189:25 190:7,8 perspective 36:23 165:9 persuade 119:9 persuaded 93:13 petition 48:11,13 phone 97:11,16,20 97:23,24,25 98:3 98:14 99:6 100:6 101:12 103:14,14 103:16 105:6 106:10 107:4 151:18 159:15 Phones 97:25 photo 146:18 phrase 114:5 155:18,18,22,24 156:3,20 176:21 physical 141:3 physically 25:24 113:11 126:25 134:18 picked 92:18,23 136:16 138:23 picking 90:3 picture 3:5 piece 117:21 163:23 188:20 pieces 57:4 pin 119:15 pinning 118:2 pinpoint 86:8 pinpointed 87:12 pissed 172:20 place 9:22 14:5 57:3 89:3 119:24 121:8 129:13 147:6 151:22 placed 21:15,22 102:23 103:9 105:1 113:24 114:4,5 118:17 118:21,24 134:8 134:9 140:9 163:8 168:22
--	--	---	---	---

<p>placing 111:20,20 113:3,25 114:6 117:23,25 118:18 118:21,25</p> <p>planned 69:20 70:5 109:25</p> <p>planning 96:14</p> <p>play 114:11 122:3 168:7,8 181:24</p> <p>playback 168:9 171:12 173:24</p> <p>playbacks 172:24 173:19 174:9</p> <p>played 114:15 122:5,14 138:5 168:11,16 171:13 171:16 182:1,19 183:18</p> <p>playing 184:1</p> <p>please 1:8 26:9 30:17 33:6 34:22 37:15,16 39:21 40:21 50:21 52:14 53:9,9 59:2,12 80:23 95:12 100:19 102:12 106:16 114:12,14,17 116:16 122:3,13 122:20 124:13 127:4 135:5,7 138:4 142:8 164:1 167:9 168:9,15 169:4 171:11 172:13 182:3,17 184:5</p> <p>plot 53:25 54:13</p> <p>ploy 52:12</p> <p>pm 80:2 84:17,23 120:16,18 141:25 142:2,4 182:9,11 190:20</p> <p>pocket 97:11 101:11 102:23 104:17 105:7</p> <p>pocket' 104:20</p> <p>pockets 102:25 103:17,18</p> <p>point 8:16 24:10</p>	<p>30:12 47:15,16 63:19 71:20,25 82:19 85:20 89:20 96:14 98:6 99:2,8 100:11 104:13,16,23 106:9 112:19 123:6 138:15 160:24 165:3 169:13</p> <p>pointing 36:4 168:13</p> <p>points 161:3</p> <p>Poland 40:13</p> <p>police 132:12,14 132:16,19,25 133:4,9,13,19 134:4</p> <p>policy 93:21 99:20 99:21 102:8 180:3,5</p> <p>poof 181:15</p> <p>poofster 181:15</p> <p>position 36:25 37:2 99:10 168:22,23 179:24</p> <p>positioned 112:2</p> <p>positive 3:5</p> <p>possible 12:12 30:16 36:21 48:20 55:6 69:1 93:22 103:4 182:17</p> <p>possibly 9:5 19:7 19:12,13 31:24 35:1 36:5 60:8 83:19 85:23 92:22 96:13 106:11 109:16 121:1 122:18 125:7</p> <p>post 180:12</p> <p>postdates 70:24</p> <p>potential 133:17 169:14</p> <p>potentially 89:5 102:21 149:15,19 151:9 153:15 162:24 164:24</p>	<p>173:22 175:22 180:7</p> <p>Povey 19:8,13 110:11 111:10 115:23 116:11 117:18</p> <p>Povey-Meier 19:9 19:11 111:25 114:21 115:4 116:9 119:8,13</p> <p>Povey-Meiers 110:4</p> <p>power 29:4,7 175:15,17 187:1 187:4,6</p> <p>powerful 154:16</p> <p>PPE 150:18 179:8</p> <p>practical 8:20</p> <p>practice 111:3</p> <p>prefer 82:4</p> <p>preferred 169:8</p> <p>prepare 2:19,23 4:4 91:23 146:3</p> <p>prepared 2:25 3:15</p> <p>presence 138:21</p> <p>present 22:3 94:10 101:2</p> <p>press 133:15</p> <p>pressure 28:7 67:4 67:11</p> <p>pressured 91:13</p> <p>pressurised 13:21 15:25 16:1</p> <p>presumably 7:13 56:11 65:21,25 70:20 76:17 139:13</p> <p>presuming 69:24</p> <p>pretty 10:14 31:7 39:15 52:20 56:20 57:17 154:21</p> <p>prevalent 174:23 174:24</p> <p>prevent 103:3 162:15</p> <p>prevented 18:13 18:17</p>	<p>prevention 180:3</p> <p>previous 40:25 64:16 92:2,2</p> <p>previously 62:10 92:13 108:11</p> <p>prick 27:10</p> <p>pride 161:2</p> <p>primarily 129:13 168:20</p> <p>prior 163:9</p> <p>prison 12:2 13:2,3 13:8,12,14 146:13 147:13 153:17 157:17</p> <p>prisoners 11:22</p> <p>private 186:15</p> <p>probably 6:25 10:15 13:9 14:8 14:9 15:5 21:23 28:14 35:13,15 35:15 36:14,14 38:13,16 45:12 72:10 73:12 76:11 92:24 161:24</p> <p>problem 14:11 48:13 79:23 86:7 181:8 187:21</p> <p>problems 23:5 108:22 147:3</p> <p>procedures 89:18 89:21,23</p> <p>process 4:22 22:7 29:15 36:18 68:17 109:13 146:2 162:9 183:23</p> <p>produced 103:4</p> <p>professional 58:8 167:2 177:2 185:22 189:10</p> <p>programme 15:22 16:11 75:4,10 76:8</p> <p>progressively 2:7</p> <p>project 142:23</p> <p>promoted 77:24</p> <p>prompt 34:2</p> <p>properly 170:11</p>	<p>proportionate 99:24 110:24 167:8 168:25 170:3</p> <p>prosecution 133:2</p> <p>protect 8:18 62:17 123:8,16 168:22 169:20 172:10</p> <p>protected 131:8 140:3</p> <p>protest 130:2</p> <p>protesting 129:20</p> <p>protests 130:4,6</p> <p>protocol 36:17</p> <p>proud 175:4,24 176:1,6 177:3 185:21</p> <p>provide 8:16 110:10 170:7</p> <p>provided 43:8 52:11 62:19 93:1 121:25 142:10 150:12 163:3,13 169:22 172:4</p> <p>provides 170:10</p> <p>PSU 61:7 63:4 168:17</p> <p>PTSD 22:23,24 164:20,20</p> <p>public 56:14 86:16 183:24</p> <p>puddle 111:13</p> <p>pulled 125:12,12 126:2 129:6</p> <p>pulling 53:17,18 126:9</p> <p>punch 39:13</p> <p>punched 131:2</p> <p>purpose 12:19</p> <p>pursued 133:16</p> <p>push 39:13 59:22 59:22 168:1 169:13,18 171:18 172:5</p> <p>pushed 58:15,15 115:7 131:4 166:22 168:4,5 171:21</p> <p>put 21:6 29:11</p>
---	---	---	--	---

32:4 33:9 36:25 37:2,22,24 38:3,4 38:12,23 39:14 45:10 46:16 47:12,16 51:18 65:17,18 69:11 71:3,7 73:1 74:5 74:7,9 77:1 79:14 99:9 102:5 103:16 104:16 120:7 124:11 127:14,17 138:3 139:11 150:18 162:19 167:16 172:1,13 173:4 179:10 puts 173:6 putting 33:24 135:11 179:21 <hr/> Q qualifications 143:15 quality 154:1 quantity 154:1 question 74:14 78:22 89:19 109:12 145:7 150:6,20 160:17 161:5 165:24 171:2,4 179:12 186:4 questions 5:21 23:7 26:6 49:23 68:24 69:13 77:13,19,20,21 78:1 79:19 120:7 141:16,18 183:17 190:9,10,11 191:6 quick 36:21 65:15 quickly 12:11 91:10 quiet 91:21 92:4,5 94:24,25 157:17 quite 9:5 15:25 23:11,13 25:13 28:15,24 29:21 30:22 31:10,16 37:13 39:12	55:24 56:7 59:25 59:25 62:24 63:17 64:16 65:24 68:17 82:18 85:21 91:13,21 92:4,17 97:25 101:19 109:16 122:6 149:24 154:22 155:8 164:10 173:1 182:17 quitter 150:5 quote 63:5 150:10 quotes 12:25 32:4 <hr/> R race 52:22 racism 62:25 63:2 racist 27:11 42:21 43:13 49:7,23 61:4 62:23 63:6 63:9,20,22 167:15 raise 17:20 21:2 153:22 156:25 161:7 raised 66:21 161:25 162:1 169:11 raising 18:13 134:16 rapport 165:2,3,5 165:11,15,18,22 165:25 190:3,6 rarely 89:22,25 raving 54:13 razorblades 164:14 re-ask 171:1 reach 68:5 101:11 reached 97:10,15 98:3 106:10 reaching 98:4,14 100:6 104:17 106:11 reacted 57:25 59:9 reactive 169:17 read 26:14 43:9 92:9 112:25 119:3 167:4	177:8 reading 96:20 169:6 175:23 reads 140:23 real 149:4 realise 21:11 realities 36:15 reality 88:18 146:3 147:11,21,25 148:4 149:21 180:2 really 4:16 13:5 21:8 34:17 40:22 40:24 43:12 46:11 49:2 76:16 81:23 124:16 125:9,9 144:10 144:18 146:3,16 148:17,24 155:5 159:8,23 165:14 173:1 177:11 reason 20:9 42:2 52:13 74:8 79:6 82:13 97:1 100:17 103:1 110:8 181:6 reasonable 71:2 100:3 110:22 119:20 167:7 169:21 170:3 172:11 reasonably 66:15 reasons 22:11 47:17 85:4 102:18 119:17 reassurance 154:14 reassure 12:6,7 recall 4:19 14:19 22:15 51:23 102:3 110:9 129:18 130:2 131:6,22 135:3 141:1 153:3 156:5 164:8 181:3 188:25 recalled 103:24 recalls 103:12 106:19	receive 4:6 78:2 164:15 received 2:17 3:4 4:3 9:20 137:8 receiving 10:12,17 22:16 72:4 reception 61:14 62:15 180:13 recognise 156:6 recollect 9:7 50:16 50:16 54:23 64:12 78:7,18 recollection 93:24 100:16 120:22 121:21 122:8 124:4 164:13 167:6 173:21 174:11,16,17 176:3,5 181:10 181:17,19 183:8 185:15,18 record 30:18 32:5 37:16,21 53:9 71:12 95:21 recorded 26:7 106:7,13,14 140:7 163:16 recording 26:10 32:2 48:21 51:17 recordings 45:20 48:19 recovery 36:25 37:2 recruited 5:18 recruitment 1:19 162:9 rectify 12:24 red 95:6 redacted 37:19 redundancy 143:11,14 refer 21:23 80:17 166:16 reference 32:4 33:8 35:2 60:17 80:23 132:24 133:3 142:16 references 163:14 referred 96:7	137:5 referring 21:16 188:23 189:1 refers 35:3 113:16 reflect 16:12 63:12 63:24 reflection 45:19 refreshers 23:2 150:9 refused 102:21,25 103:17 116:14 refuses 110:7 refusing 85:7 regard 63:25 regarding 134:7 148:18 Regardless 38:18 regards 31:15 44:13 68:7 regret 27:21,22 28:1 31:5,19 34:19 38:7,8,10 78:24 regretted 72:9 regular 61:19 134:1,3 149:25 150:11 regularly 86:21,22 88:3,5 relate 86:13 related 189:20 relation 50:20 54:20 60:23 61:4 61:12 64:3 91:6 92:9 95:8 147:21 155:2 relationship 19:14 46:24 47:10,13 relationships 47:5 relatively 92:21 relax 116:8 released 99:9 105:2 131:25 relentless 144:18 relevant 47:19 50:19 70:25 84:14 85:25 86:3 88:14,20 94:19 129:14 170:1
---	--	---	---	--

relocate 93:15 96:15 relocated 93:16 99:18,20 remain 104:10 remarks 141:2 173:16 remember 4:12,16 7:18 11:25 16:22 17:19 19:4,21 22:2,18,18,21 23:6 24:3 33:14 33:15,16 37:7,9 50:8 55:9,11 68:1,9 73:22 76:10 78:9 84:22 86:25 87:3,4,10 88:8,10 96:18 97:24 105:13,15 107:11 111:25 121:14 125:24 126:6,14 127:21 127:22 129:21,25 130:4,6,9 131:17 131:19,21 132:3 132:10,16 137:14 137:22 146:10 147:16 153:24 155:1,6,15 157:5 157:8,11 158:22 161:5,20 163:1 163:11,15 164:12 166:5 170:15,18 173:2,12,13,17 176:7 177:7,19 177:21 178:2,4,6 178:12 183:8 184:21 185:20 remind 81:5 138:2 reminded 189:12 189:16 removal 69:25 119:18 133:17 remove 77:14 102:25 110:1 119:15 removed 56:3 60:24 163:10 repeat 21:18 75:8	171:4 repeated 58:13 repeatedly 111:12 111:24 repetitive 145:2 rephrase 165:24 186:4 replace 57:6 66:13 replenish 66:13 report 71:10 93:6 94:7,8,11 95:7 102:10 106:4,5,9 107:22 108:2 110:13,14 113:12 116:1 117:16 118:25 119:2,5 122:20 123:15 125:22 129:8 139:6 140:19 172:9 reported 125:23 128:24 129:1,11 139:5,8,10 183:21 reports 105:21,22 107:9,13 118:5 118:17 reprieve 144:22 reputational 76:3 request 29:11,13 29:20,21 33:24 55:16 65:6 69:7 132:5 requested 64:7 requests 8:22 64:20 require 7:4 required 85:8 103:3 162:22 reside 36:16 resident 85:6 132:7 resident's 92:1 residential 6:18 7:8 149:8 153:3 residents 48:11 93:14 95:1 resign 187:9 resisting 173:10	176:17 177:15 178:9,17,20 resisting' 173:10 177:16 resort 70:7,11 112:16 119:21 178:5,13 179:20 respect 52:19 53:2 189:25 respond 10:5 48:20 55:15 164:10 responded 9:23 53:17 54:10 66:15 104:18 163:17 responding 36:18 55:2 163:7 response 34:2 36:19 51:7 55:3 55:4,7 58:2 61:11 64:8,18,20 71:3 121:12 122:24,24 128:5 128:12 162:5,17 169:12 responsibility 4:11 157:24 161:1,4 responsible 23:23 23:24 restart 122:13 183:14 restrain 104:24 150:17 restrained 98:16 restraining 43:13 restraint 109:25 124:17 163:10 179:19 restraints 88:17 88:19 resultant 168:24 resulted 77:9 retarded 173:7,8 return 5:16 44:15 80:2 120:12 141:25 returned 81:10 returning 77:1	190:14 review 21:15,22 22:3,6 152:15 170:11 173:25 reviewed 21:25 137:4 reviewing 170:2 reviews 19:18,20 19:21,22 rewatching 170:16 ridiculous 147:12 right 1:20,21,23 1:24 2:1,20,21 4:4 5:13 6:1,2,13 14:17 16:19 17:13,18 18:3 19:12 20:3 21:22 22:6,13,17 23:9 23:21 25:19 27:16 29:12 32:12 33:7,21 34:23 35:9 36:1 41:9 42:24 48:14 50:1,9 52:2,22 53:5 63:7 64:11 66:19 69:17 70:3 71:15 72:18,19 73:25 74:20 77:2 81:7 83:23 84:12 84:15 86:21 94:19 95:2 96:12 97:11 98:8,13 99:10,11 101:11 101:17,21 102:5 103:5,10,19 104:16,22 121:20 123:6 125:12 126:2,9 129:6,14 133:6 141:8 148:19 158:16 169:12,20 180:4 right-hand 114:1 rightly 68:10 Ring 19:13 ripped 163:7 ripped-up 164:4 rise 69:3 182:6 risk 109:14 123:17 risks 109:10	role 2:3 3:16 4:2,9 4:20 5:4,9,17,21 5:25 6:6 41:8 66:18 77:25 82:4 82:9 83:7,21 126:16 143:1 145:22 186:24 room 7:4,10,17 53:23 56:13,19 60:22 65:14,17 65:18 96:4,10,17 96:22 97:2,5,13 99:4,5 100:25 101:2,5,16 102:2 102:16 103:12,25 104:6,9,10,12,24 105:3,9,9 106:6 106:19 107:17 110:1,3,9 111:7,8 111:10,12,12,15 111:16 112:5,7 112:12,17,19 113:7,19,20,22 114:1,20 115:1,9 116:10,19 117:9 117:11 118:14 119:12,12 121:8 121:13,13,19 124:20 134:19 136:17 137:10 138:24 149:7 152:7 163:10 167:14 room's 111:21 roommate 110:2 114:22 roommates 57:10 rooms 7:3 56:17 66:10,11 109:17 112:8 158:21 roster 84:22 rota 78:14 roughly 4:14 61:2 round 173:4 route 11:7 routine 145:5,14 145:23 row 84:18 128:9 128:13,16
--	---	--	--	---

rude 60:23 rudely 61:1 rule 102:20 109:11 109:15 rules 10:19 11:4 11:16,18,23 45:13 146:7,8,10 run 146:7 147:2 running 91:9,12 110:4 144:19 145:20,24 156:17 158:11 160:18 runs 12:2 rushed 140:14 rushes 107:16 Ryan 80:9,10,15 106:23 107:11 127:6 191:8 <hr/> S S 103:5 sacked 157:4 180:15 safe 129:23 160:15 160:21 safety 103:1,3 111:19 113:2 115:19 123:7,13 salary 83:22 sat 157:11,14 satisfied 68:19 Saunders 17:9 153:2 162:2 saw 5:25 6:3,5 11:10 12:19 14:15 15:6 25:12 42:16 72:2,5,6 75:21,21 88:3 102:11 107:15 112:1 117:13,21 118:19 122:15 127:17 130:10 141:10 144:2 149:17 162:11 167:14 170:23 Sayers 111:17,19 111:19 112:23,24 113:2,3,6,9,13,16 113:18 114:2 115:4,10,19,20	115:24 116:2,20 116:21,23,24,25 117:19,22,22 131:7 134:14,16 134:17,22 135:2 135:16,20 136:1 136:7,11,16,22 136:24 138:21 139:5,17 140:6 140:17,24 141:1 Sayers' 113:15 saying 11:4 16:8 25:9 26:16 28:1 30:3 31:5,10 33:10 34:19 35:11 38:11 39:9 39:12,24 44:10 46:4 48:22,22 50:17 51:17 54:10,23 62:5 67:8 79:15 90:9 108:14 116:9 135:23,23 136:5 137:22 145:13 148:14 149:12 156:1 161:17 174:13 175:19 176:16 183:25 185:17,18 189:7 says 20:19 26:15 26:19 27:10,11 32:12 38:7 43:9 43:10,22 53:13 53:14,17,21 54:1 54:4,12,14,17 55:13 59:4,8 67:15 93:16,17 97:23 100:13 101:7,20 102:18 103:8,16,19 104:12,18 105:9 106:9,18 107:10 107:14 110:25 114:2 119:4,6 123:15 124:19,23 125:16 126:11 127:16 132:25 135:9,13 136:4 137:2 166:19,19	166:25,25 169:3 172:18 181:18 184:6 188:4,10 scared 157:4 scary 150:20 scenario 11:3 21:17 120:5 school 109:4 screaming 163:9 172:21,22 173:4 screen 26:8 33:5 35:18 37:15 50:21 59:2 80:18 80:20 95:6 106:16 110:15,19 114:16 116:15 119:6 124:11 129:18 132:24 135:2 163:5,22 166:15 167:9 169:4 scroll 95:10,13,22 184:5 scum 48:1 se 175:14 Sean 135:8,16,20 136:1,7,11,16,22 136:24 141:1,10 search 61:15,19 99:13,21 searched 86:19,20 86:21 87:1,3,4 99:17 second 34:24 97:16 98:3 102:14 106:10 119:9 164:5 seconded 4:2,20 4:23 seconds 69:9 77:17 115:6 117:6 security 10:22 132:9,18 183:23 see 8:17 14:16,23 14:24 15:8,12,15 15:16,21 16:11 25:4 28:24,24 29:7 30:10 35:13 36:3,7 41:11,22	42:15 55:22 57:5 70:15 74:1 80:18 95:13 96:17 97:5 97:9 104:20 105:23,23 106:1 106:15 107:17 112:18 114:19,20 114:21 116:11 122:21 123:19 124:6,20 127:8 128:1 132:7 135:6 137:16 138:18 143:14,22 163:14 164:1 165:4 168:13 171:10,14,17 173:22 175:13 181:23 187:20 188:22 190:18 seeing 14:19 34:1 75:4,9 103:14 106:25 121:14 127:22 139:3 141:5,7 153:3 170:17 seek 68:5 seeking 42:6 seen 11:11 21:14 21:21,25 32:1,6 38:8 48:19 51:17 58:25 62:3 67:13 70:18 76:19 94:19 95:6 105:20 112:5 115:10 117:14 118:6,23 119:2 123:10 149:3,20 186:3 select 90:7 self-harm 19:25 20:2,6,8,17,19,21 21:20 22:11,13 98:17 103:2 109:11,14 164:14 self-harmed 21:13 self-harming 108:5 155:3,25 162:15 164:11,16 166:2,4	send 41:16 sending 41:18 42:3 sends 54:18 senior 16:16,17,24 17:2,12 18:6,13 25:15 68:3,10 73:7 79:11 129:3 139:11 152:11,18 152:19 153:7,8 153:13,23 157:18 161:19,25 162:3 sense 144:11,23 145:6 175:7 176:13 187:6 sent 40:11 43:24 119:14 180:13 separate 35:1 163:22,23 September 49:22 82:10 SER000434 80:24 series 60:15 serious 20:24 21:1 21:2,4,5 seriousness 99:25 110:24 server 159:4 session 114:8,9,13 114:17,18 122:1 182:15,20 183:18 183:19,19,21,24 set 9:2 36:17 58:4 110:25 121:11 130:9 sets 106:2 setting 186:15 seven 146:17 sexuality 60:10 Shadbolt 111:17 112:23 113:19 116:19 131:6 shadow 78:6,19 shadowed 78:10 shadowing 3:23,24 4:7 78:5 149:11 149:20 shake 131:24 132:3,10,11 Shane 122:12,15
--	---	--	---	---

122:18 123:7 124:20 127:17 190:16 share 10:16 105:21 shared 10:14 sharing 105:22 Shaukat 96:2,21 98:6,12 101:4,19 104:10,23 105:4 105:11,13 106:24 107:24 Shaukat's 100:20 she'd 50:6 sheet 163:8,18 164:4,6 Sheharyar 96:2 104:10,23 shield 111:20 113:3,18,24 114:4,6 117:3,10 117:22,23 118:3 118:18,22 119:1 119:15,23 140:9 shields 115:7 shift 25:23 27:25 82:1,1 84:13,13 84:15 130:7 145:14 152:13 shifts 87:22 143:24 143:24 144:17 146:24 shirt 122:16,17 shit 40:13,24 shocked 60:23 short 23:11,14,19 24:15 32:6 69:5 80:6 102:13,16 120:17 122:2 139:21,25 142:3 157:23 182:10,13 short-term 147:6 shortage 66:4,6 shortly 77:1 122:4 shorts 28:21 shot 14:5 122:11 shoulder 107:6,7 107:18 shout 123:5	shouted 167:15 shouting 96:23 97:1,3,8 103:13 104:21 show 8:10,14 16:8 95:5 114:7,7,14 119:16 122:1 124:12 132:23 163:3 showed 16:9 146:18 154:18 170:23 shown 15:20 16:2 76:18 80:17 83:3 124:6 129:17 137:6 166:7 170:13 172:9 shows 170:13,19 171:7 shut 61:2 62:1,3,6 62:7,8,9,11 173:10 174:13,25 175:11,19 176:17 sick 26:20 side 8:7 111:21 112:2 114:1 122:11 131:7,7 187:23,23 sign 152:16 signed 48:11,12 51:5 80:22 95:16 100:10 142:11 silly 146:16 similar 64:16 101:19 114:2 141:13 176:8 simply 166:25 simultaneously 168:4 single 7:3 105:18 sink 148:21 SIR 139:11 SIRed 129:2 sit 93:14 113:22 114:3 115:11 140:13 182:12 site 73:7 85:8 sitting 97:14,17,18 101:9	situation 8:15,24 9:1 21:8 25:14 41:24 53:12 67:21 70:9 75:18 99:25 110:24 121:16 149:18 151:5 152:7 162:24 179:23 184:18 situations 8:19 9:14 10:3,5,6 42:7 52:20,25 69:24 72:15 149:4 154:24 six 104:5 161:12 162:20 sixth 113:17 size 92:24 skills 112:15 Skitt 4:21 5:8 17:5 152:23 slight 138:15 slightly 3:12 slipped 136:18 138:24 slowly 2:7 57:3,3 small 37:17 39:7 53:15,21 54:9,14 112:10 155:19 156:6 smoothly 160:18 SMT 16:17 18:1 snippets 15:22 soft 61:18,24 solicitor 34:1 solicitors 147:8 somebody 7:10 31:14 39:13 56:19 79:8,16 102:5 135:9 147:22 170:2,11 171:20 176:20 178:16 181:14 Someone's 36:20 soon 27:24 30:19 101:17 sore 160:24 sorry 3:7,8 18:16 19:10 20:7 21:18	21:24 25:8 29:6 31:5 34:24,25 40:25 57:21 75:8 75:25 82:4 94:19 109:12,24 124:13 134:2 145:10 147:19 148:2,2 150:21 153:25 157:22 159:12 161:24 165:23 170:5 171:3 173:13 174:7 177:25 179:13 182:5,23,25 183:11,13,15 186:4 190:7,8 sort 2:13,25 3:16 3:17,19 4:7,7 5:5 5:11 8:13,14,18 8:20 9:5,7,15,16 10:24 11:1,13 12:8,18,20 13:10 14:10 15:11,21 15:22,23,24 16:6 18:6,7,8,10 21:9 25:22 28:7,9 29:4,13,16 30:9 31:7,10,16 32:15 32:17 33:19 34:10 36:15 37:7 38:25 40:7,12 41:4,5,25 43:1 45:17 46:16 51:19 52:6 54:22 57:13,14 63:18 65:5 67:20 68:7 68:11 70:5 71:18 71:21 73:5 75:14 75:14,20 76:15 78:6 79:8,9,13 83:16 84:5 85:4 86:25 87:19 88:2 108:20 109:5 111:5 118:24 131:8 133:9 143:14 144:1,7 145:19 146:8 148:18 152:5 157:6,7 159:1	160:3,23 161:3 161:19 162:8 173:6 174:4,6,21 174:22 178:5 181:20,21 184:18 184:19 185:4 sorted 12:9 33:20 33:23 34:15 sounded 2:4 125:4 sounds 5:11 97:18 103:21 172:25,25 178:21 space 144:6,13 167:23 168:24 spare 53:23 speak 12:7,16 17:14,15 20:12 20:13 31:2,14 33:24 34:14 46:20 52:5 59:10 68:2,10 79:2,3,4 83:19 102:17 104:7 115:1 119:13 120:10 133:25 144:22 153:19,21,23 155:10 158:13 189:13 speaking 18:17 114:23 138:22 177:3,22 specific 46:3 59:25 59:25 89:19 92:6 92:25 152:9 153:9,24 154:10 155:15 163:1 164:15 166:11 174:4 176:7 184:18 185:20 specifically 88:8 150:7 155:1 156:22 157:5,9 185:12 speculating 165:16 184:19 189:5 speed 168:9 171:12 spell 31:2 spend 16:18 24:14
---	--	---	--	---

25:10 spent 3:21 15:10 spice 36:10,13,17 36:18,20 37:5,10 37:12 180:9 spilling 28:9 split 139:22,25 spoke 79:7 140:17 155:7,19 177:4 189:9,18 spoken 18:2,18 21:15,21 57:15 61:12 76:19 129:2 134:5,6 147:20 174:14 spontaneous 70:6 103:3 sport 24:8 spread 159:5 squeeze 136:9 SR 135:19 SR'd 135:18 stabbing 123:2 staff 7:25 8:1,10 10:13 13:4,5,19 13:22,24 14:6,8,9 14:12 16:9,15 23:9,12,23 24:12 25:2 30:9 31:7,8 50:5 67:16 70:12 84:2 86:1,3,5,10 86:11,13,16,18 86:21 87:8 89:3 89:24 90:1,17 99:3 111:2,7 119:10 131:20 133:25 141:12 149:24 152:2,5 154:21 156:14 157:24 158:18 159:13,21 160:22 160:22 161:6,14 169:14 185:9 staffed 23:11,14 24:15 157:23 staffing 23:7,19 88:11,13 89:8 158:3,15 161:8 stage 4:4 45:25	stand 8:11,12,23 9:4 10:19 24:15 24:23 25:2 28:10 45:12 106:5 113:20 117:25 118:1,25 125:22 142:13 Standards 58:8 167:2 standing 9:10 28:13 38:24 39:10,17 staring 50:2 start 1:18 82:1 85:22 91:15 100:22 114:11 122:10,21 127:7 129:14 138:4 159:23 169:6 started 2:5 57:1 104:21 161:22 167:21 starters 146:23 starting 2:18 95:25 111:4 150:3 starts 59:3 84:20 86:2 91:15,18 102:13 110:18 111:5 124:15 135:7 state 132:8 statement 1:10,12 1:15,17 2:2,16 4:1 5:9,22,25 6:8 7:22 8:10 12:1 13:1,20 14:14 15:19 16:15 18:25 20:1 21:12 22:9,15 23:18 27:13 28:10 33:18 35:7,24 38:19 41:6 42:20 43:8 45:6 46:23 47:23 48:4 49:21 49:25 51:22 58:3 58:11,23 59:1,18 60:18 63:5 64:4 69:14 71:1 73:6	73:21 75:3 80:21 80:25 81:3 82:12 84:9 85:1 87:15 88:12 93:2,9,15 97:22 100:13 106:17 108:3,4 109:23 110:5,13 110:25 121:4,5 121:24 124:4 129:16,22 130:10 131:22 133:14 139:22 140:23 142:10 146:1 148:4,25 150:9 150:23 152:11 154:4 158:17 160:13 166:17 167:3 169:22 170:6 172:2 180:2,8 189:24 190:1 statements 67:20 93:5 status 12:23 stay 6:12 7:14,19 43:15 85:4,8,12 85:16,21 91:21 92:4,5 152:14 168:2 staying 6:24 85:12 step 5:7 29:16 46:4 167:24 Stephen 190:16 sterile 95:1,3 Steve 4:21 5:8 17:5 96:3 101:18 104:6 106:20,22 107:17 152:23,25 153:1 Stinking 38:5 stood 97:13,17,19 101:9 104:21 167:20 stop 27:2 33:13 34:17 62:4 98:21 99:5 100:6 130:24 166:2,3 168:6 stopped 184:1	story 38:13,17 straight 94:13 130:23 Straighten 136:8 straightforward 68:18 strangling' 169:19 straw 74:25 stream 145:9 stress 32:8 39:5 72:14 134:19 189:20 stressed 27:23 28:6 32:13 74:19 stretch 149:23 stretched 159:18 stronger 60:5 struck 134:18 struggling 162:12 Stuart 19:8,9,11 19:13 115:23 116:11 117:18 stuff 16:6 38:14 40:8 60:22 62:14 108:20 125:3 126:13 135:24 subheading 84:11 subject 45:10 46:5 46:10 73:12 succeed 97:12 98:19 successful 47:2,9 sudden 76:2 suggest 43:2 80:2 120:8 140:17 141:23 189:2 suggested 32:24 61:13 suggesting 55:4 suggestion 95:20 suggests 47:1 55:3 125:18 summarise 53:14 60:16,20 166:19 167:12 summary 50:22 61:11 88:13 110:4 summer 65:21	supervision 109:17 support 16:16 131:19 132:25 133:1,2,7 150:2 154:14 supported 133:8 supports 168:20 suppose 10:15 29:16 73:11 85:24 86:15 132:8 sure 33:9 37:1,4 38:15 39:3 49:16 62:12,16 65:8 69:10 77:22 91:19 99:21 135:4 146:18 153:1,11 156:16 158:22 161:14 162:18,20 180:16 surname 153:1 surprise 14:20 surprised 14:15 35:13 73:11 surrounding 130:17 suspected 130:11 suspended 72:17 72:20,24,25 73:4 73:8,15,24 74:10 74:18,23,25 75:17 76:5 suspension 77:4 suspicion 86:9,11 suspicious 87:7 Sussex 132:25 swallow 97:11,21 97:22 98:1 101:11 103:16 107:5 swap 141:24 swear 167:25 175:9,24 176:10 swearing 31:11,16 50:10 175:8 176:2,2,14,19,20 177:7 185:1,11 185:12,20
---	--	---	---	--

swearwords 174:20 175:3 185:8 186:7	33:10 35:4 37:18 44:11 45:20 53:11 54:3 59:3 59:18 62:20 65:2 65:2,12 70:8 75:20 104:12 115:16 118:18 127:15 128:8 138:11,13 152:17 152:17 164:2 166:1 173:14 175:8,10,16 176:15 178:3 181:1,16 182:24 185:13	telling 30:14 62:4 temper 32:7,20 53:6 64:23 78:23 79:3 temporarily 77:24 temporary 5:11 83:9 ten 16:18 77:17 tend 16:6 18:10 87:19 tense 13:21 15:25 16:2 tension 167:19 tensions 159:13 term 63:6 119:1 148:22 terms 8:20 16:5 24:16,19 38:14 45:15 55:18 69:20 77:25 154:19 158:13 162:23 170:15 173:24 174:5 189:14 terrible 174:20 179:24 181:7 182:23 183:11 textbook 123:24 124:1,2 126:10 129:9 thank 1:10,13 60:19 64:5 77:21 78:9,21 79:19,21 80:4,8 119:6 120:14,15,19 122:4 141:19 142:1,15 143:19 145:12 168:17 171:15 182:14,18 184:2 190:11,13 190:18,19 theory 108:21 they'd 16:20 20:11 22:3 24:8 41:15 42:1,12 47:16 63:18 74:7 76:24 147:14 thin 159:5 thing 5:12 12:17	26:14 29:13 30:20 38:25 52:7 55:24 56:8 57:17 63:18 75:13 77:14 98:19,23 127:19 128:4 131:6 134:12 149:6 154:1 155:13 156:18 157:7 162:11 173:3 174:6,11 176:3,22,25 188:13 things 3:11 6:8 8:9 9:19 12:25 14:15 18:10 20:14 21:11,19 22:9 30:6 32:24 42:20 44:12,19 46:22 47:14 57:10 61:14 66:12,14 70:1 72:8,16 75:3,15 107:13 110:19 132:8 136:8 141:8 144:19 146:16 147:2 152:6,8 154:17 155:15,16 156:12 157:25 158:11 159:6 160:11,19 162:10 162:25 165:7 166:8 176:8 think 2:25 3:4,12 3:16,18,24,25 4:12,12 5:4,4 6:3 6:4,5,7,25 8:1,2,4 9:2,22,25 10:1,10 10:13,15 13:5,6 14:1,13,23 15:23 16:1,3,15,22 17:10 18:4 19:12 20:16,18,20,25 21:1,4,5,8 22:10 22:15 23:10,10 23:17 24:4 25:1 25:12,13 27:19 28:3,5,5,7,8,14 28:16 29:2,2,3,24	29:25 30:1,14 31:3,17,18,21,22 32:10,11,11,11 32:12 34:5,11 36:2,4,9 38:13 44:3,3,7,16,17 45:5,12,14,17,19 45:23 46:11 47:1 47:4,5,8,11,13 48:3,20 49:24 50:10,13,14 51:6 51:19 52:24 53:1 53:2 55:8,25,25 58:8,9,11,19,22 59:17 60:7 61:7 62:18 64:21,22 64:23 66:1,7,14 66:16 68:1,2,2,15 68:17 72:3,9 73:3,12 74:7 75:5,10 77:8 79:7 81:25 82:13 82:23 83:3 84:2 86:19 87:10 96:8 96:10 100:1,1 107:4,21 109:6 115:15,16 116:3 117:24 121:18 122:7 126:8 127:15 128:11 129:22 130:11 136:5 138:2 139:18 144:6,7,8 146:6 147:5 149:4,23 150:1,2 150:3 151:1 153:18 154:2,7 154:12 155:3,6 156:4,20 157:6 158:12,20,20,25 159:24 160:2,4,6 160:10,16,17,20 161:6,23 163:4 164:22 165:14,15 166:14 169:5 174:20 176:22 178:1 180:10,14 180:15,24 181:2 181:4,4,6 182:2,5
T				
tab 80:20 95:5 110:15 172:16 179:1 180:20 181:12 184:4,13 188:3 tactics 118:10 take 1:16 11:7 20:25 23:4 26:14 60:22 65:16,17 66:9 67:18 68:11 69:8 79:25 82:8 83:16,21 93:7 98:24 110:1 118:5 156:23,24 156:24 160:8 178:24 180:19 181:11 188:2 taken 7:10 36:22 56:10 69:25 88:21 119:24 128:20 131:16 133:4 152:5 190:4 takes 71:24 talk 5:22 7:24 18:9 23:16 26:17 35:8 40:19 57:9,13 79:8 87:7 88:11 89:17 90:20 91:17,20 98:25 118:18 180:8 talked 78:22 160:23 talking 8:24 14:4 16:24 21:9 30:19	talks 102:14 Tam 188:4,10,17 188:21 targets 169:15 task 2:23 taxes 40:7 tea 80:1 team 16:16,17,25 17:12 81:15 91:23 92:20 94:9 111:9,15,19 112:21 113:3,7 113:18,23,24 115:5,20 116:18 119:14 134:23 136:10 137:22 138:7,9,14,17,19 139:14 149:25 152:19 153:8 163:16 166:6 teams 89:17,21,25 90:3,7 teased 59:15 technique 172:8 178:6,13 techniques 70:8 165:19,25 169:15 178:16 telecommunicati... 142:24 tell 10:9,11 43:14 53:22 62:6,10 81:4 83:11 94:6 147:1 154:24			

<p>190:3,5 thinking 3:3 10:8 88:2 91:11 173:7 thinks 107:14 third 102:2 179:1 thought 5:7 8:4,6 14:25 15:6 30:22 75:1 123:24 125:6,19 126:10 128:16 132:17 143:25 174:10 179:5 thoughts 10:18 88:23 threat 20:17,21 21:1 175:12,13 175:21 threaten 20:2 threatened 38:19 71:14 threatening 7:25 20:8 28:12 38:11 38:20 39:1,2 47:25 48:8 103:15 115:15 threatening 20:5 threats 9:20 10:12 32:17 72:4 135:15,16 175:9 three 4:16 15:1 24:12 34:4 45:25 78:15,19 88:16 88:16 89:14,15 115:6 147:10 159:24 three-year 46:13 threw 136:17 138:24 throat 71:4,8 throw 38:2,2,4 51:17 throwing 123:8 thrown 63:6 148:18,20 thrust 145:18 tick 162:19 time 3:22 4:3 7:7 8:23 9:16,18 15:3,10 17:4</p>	<p>21:9 24:13,17,19 24:22 25:10 29:3 29:7,24 31:15 34:13 39:4 43:6 46:9 55:22 56:13 56:25 57:3,12 65:6 66:10,11,12 67:21 71:25 72:16,20,24 73:10,12,15 76:16 77:17 78:10,20 81:7,22 82:7,21 85:14,15 86:6 87:20 88:3 88:24 90:4 92:14 94:11 95:9,19 96:8 97:16 98:3 105:20 106:10 108:12 110:10,14 111:24 115:13 117:4 121:19 123:21 125:19 128:21 129:25 130:4 131:13 133:23 139:4 141:8 144:7,14 144:16,20,23 145:18 147:18 155:8 160:12,14 167:1 172:10 173:21 174:21 175:3 177:6 178:18 183:9 185:24 189:11,21 times 18:24 23:11 23:11,13 53:6 56:2 63:20 74:21 89:13,15 96:25 158:17 160:15 169:13 189:13 tired 63:18 85:21 128:16 144:9 today 80:25 141:21 TOIL 85:14 toilet 55:20,23 56:11,18 57:9 65:7,9,12 toiletries 43:23</p>	<p>toilets 56:14,16 told 5:2,12,14 11:23 12:13 30:9 41:13 44:4 51:24 52:17 57:23 59:5 60:22 61:2 62:1 62:2,7,7,9 64:8 72:23 73:5,7 74:16 91:18 100:1 106:20 111:25 112:21 115:5 121:12,22 129:23 130:19 133:20 137:9 147:6,9 155:23 167:23 168:2 174:2 176:21 tomorrow 190:17 190:19 Tomsett 1:4,5,9,10 1:14 8:10 9:19 11:21 14:14 19:25 26:9 27:13 30:7 35:24 38:18 41:7 43:11 45:2 46:4 49:25 51:7 51:22 57:20 58:3 58:25 60:17 61:5 62:25 64:10 66:17 69:7,14 71:1,13 75:3 77:13,19,22 79:20 156:1 191:2 tone 49:23 101:5 top 19:7 26:15 32:17 37:19 39:24 91:6 107:15 127:9 152:15 157:16 179:2 topic 121:4 torso 61:25 total 45:5 totality 46:2 totally 27:21,22 28:1 120:24 touch 172:5 tough 92:14</p>	<p>Tower 137:16 140:22 Townshend 142:6 142:7 168:12,17 171:1,4,5,14,17 182:2,6,12,16,21 183:13,15,16,20 190:9,14,15 191:14 train 162:7 trained 23:1 151:11 trainers 163:11 training 2:17 3:4,9 3:15,19,23,25 4:3 4:6,7 22:10,16,18 22:20,23 23:3 37:5,7,9 68:7 78:2,5,7 90:25 108:17,19 111:3 139:17 145:25 146:6 147:1 148:17,19,24,25 149:2,2,7,9,12 150:8,11,21,22 151:1,7,8,8,8 162:10 164:15,19 164:22 165:1,10 165:19 169:15 170:4 172:4,8 173:23 174:2 178:15 transcript 26:10 32:1 35:3 38:7,8 124:3,11 127:23 128:14 135:5 172:14 175:23 177:8 180:19 181:11,13 183:12 183:14 184:3,13 188:2 transcripts 189:12 travel 85:24 travelling 81:10 82:8 treat 42:18 48:1 52:19 174:18 treated 53:2 154:5 174:19 186:10,11</p>	<p>189:25 190:2 tricky 153:21 tried 69:15 70:8 101:10 140:7 155:12 tries 119:8 TRN0000019 184:4 TRN0000023 180:20 184:13 TRN0000030 172:14 188:2 TRN0000031 181:12 TRN0000063 32:5 TRN0000080 26:9 53:8 TRN0000081 33:5 34:25 TRN0000083 37:15 TRN0000089 127:4 TRN0000091 124:12 TRN0000093 135:6 TRN000019 183:12 trouble 162:22 true 44:3 189:17 trust 86:6 87:16 trusting 79:16 truthful 169:23 try 8:25 12:11 20:22 34:13,14 34:25 37:14 45:13 46:23 52:12 57:5 65:16 66:13 67:21 98:18 116:8,12 118:11 130:16 140:13 150:4 156:16 159:8 160:20 165:3,8 trying 8:17 10:22 18:4 28:16 67:2 73:6 97:11,21,22 98:17 101:11</p>
--	--	--	---	--

102:24 103:15 112:3 116:7 127:13 140:15 154:8 159:7 178:21 Tuesday 190:22 Tulley 15:5 26:12 30:19,20 31:25 32:5 33:10 35:19 37:18 39:7,23 53:16 54:1 124:2 124:5 125:18,24 126:1 135:7,13 135:17,22 136:15 136:21,23,25 180:21 181:14 185:16 Tulley's 121:21 turn 30:17 34:22 40:20 52:14 53:8 80:19 100:19 121:4 183:12 turned 83:11 148:7 180:9 182:16 Turning 129:10 130:8 turnover 86:1,5,13 89:24 TV 76:2 138:21 144:3 twice 17:10 151:4 166:22 two 3:24 4:16,16 6:20,24 46:6 49:11 77:21 78:15,19 81:6 84:18 88:7,18 89:10,12,15 93:13 96:9 101:22 106:2,3 112:24 114:9 115:6 143:13,24 146:24 147:14,17 149:21 158:10,18 158:23 163:5 176:19 185:16 type 12:17 48:21 143:1 147:21,23	154:1 169:19 183:1,10 184:24 185:5 186:6 typed 94:14,15,20 94:21 types 176:19 <hr/> U <hr/> Ugh 184:9 UK 41:12 43:15 um 135:14 unaccustomed 185:5,6 unavailable 152:13 unbelievable 172:20,21,22 uncertain 147:13 uncomfortable 150:13,15,23,25 151:15 undermine 154:20 understaffed 88:15 understaffing 89:2 159:20 understand 74:14 79:20 81:15 82:2 82:4 83:16 106:23 107:12 137:4 145:8 146:10,12,14 164:24 165:3,9 173:23 188:25 understandably 159:11 understanding 36:12 understood 77:23 182:14 underwear 29:1,5 29:9,10,21 156:2 unfairly 154:5 unfortunately 84:22 96:18 108:9 114:8 120:10 133:13 140:20 158:1 178:7 unidentified	106:12 uniform 14:12,13 unit 58:8 149:8 153:3 157:21,22 165:6 167:2 United 42:2 44:13 unknown 152:7 184:9 unlock 160:14 unlocking 154:19 unlucky 137:3 unnecessary 70:16 unplanned 95:9 162:14,23 unprofessional 185:25 unrelated 120:24 unsubstantiated 45:24 48:6 49:4 52:17 67:9,25 168:18,19 unsupported 74:19 unsure 152:3,4 173:20 174:7 180:5 181:21 untrue 59:17 unwell 163:6 165:12,14 UOF 114:11 168:8 upset 157:8 upwards 162:8 use 23:2 39:13 42:16 56:8,15 65:7 68:25 69:13 70:6 85:15,20 89:17,21,23 90:2 90:18 91:7,8 92:15,18 93:8 94:5,14,22 95:7 95:10 102:6 105:23 107:12 109:20 110:5,7 110:21 112:14,15 117:25 118:2,17 118:23 119:2,23 120:25 121:2 122:20 123:22 126:16 128:17	129:10,12 139:24 140:6 141:1 150:7,9,14,22,24 151:1 152:9 155:2,5 162:13 162:14,17 163:5 165:18 166:23,24 167:11 168:25 169:2,14,20,23 170:7 172:1,15 173:22,25 176:17 177:21 178:5,8 178:13,15,15 179:6 180:8 183:4 184:22 useful 164:23 uses 117:22 usual 185:6,6 usually 6:15 71:14 84:17 88:15 <hr/> V <hr/> V201706020013 182:4 vague 93:24 vaguely 129:21,25 variety 108:25 154:2 verbal 9:20 10:25 16:6 29:21 32:16 72:4 96:4 110:7 141:3 167:17 168:2 verbally 71:13 161:9 versions 106:3 victim 132:25 133:3 video 31:25 114:15 122:5,14 124:3 125:5 138:5,11 168:11,16 171:13 171:16 182:1,19 183:18,22 184:1 videos 163:12 Vietnamese 147:16 view 15:8 30:12 41:7 45:9 165:4 169:11	viewing 70:21 112:4,8,10 views 140:25 141:4 152:10 violence 9:21 148:10 visible 152:21 visit 16:17,20 60:25 Visitors 86:19,20 visits 180:12 vocabulary 181:21 voice 116:4,5,7 137:2 volatile 13:20 volume 47:1 182:16 voluntary 143:11 143:14 volunteering 90:1 vulnerable 132:7 169:16 172:6,7 <hr/> W <hr/> wait 96:3,9,11 waiting 110:2 147:7 wake 65:22 walk 27:24 69:16 69:22 70:2 101:3 104:7 119:11 walked 111:23 walking 8:21 walkway 149:7 wanker 35:5,21 72:13 want 5:21 7:21 21:2 26:6 27:2 32:3 40:4,4,23 41:2,3 45:2 50:18 51:16 54:11 56:8 57:19 64:2 66:1 68:24 70:22 71:20 75:19,20 76:7 77:22 78:22 79:13,14 81:2 83:13 92:25 93:3 93:7 98:19 114:6 120:23 121:5
--	--	---	---	---

134:12 137:25 142:17 144:8,12 150:4,7,16 151:24 152:10 154:10 155:8 157:4 158:8 162:13 166:11,16 172:12,16 178:24 179:11,21 180:1 180:19 181:11 184:3 187:16,19 188:2 wanted 2:3 10:19 20:2,9,12 21:14 21:20 37:24 46:20 51:1,15 65:12 75:2,6,11 84:9 89:20 143:15,22,25 150:3 153:19,23 160:7 187:8 wanting 12:16 171:20 wants 179:9,10 warning 57:25 58:3,5 wasn't 5:15 14:12 15:11 17:13 25:22 29:12 31:14 46:13,15 47:2 56:16 65:13 68:18,19 73:24 74:2,15 76:15,16 78:11,17,18 83:10 108:13 113:10 115:21,24 124:16 129:7,23 132:19 133:8 135:4,20 136:21 136:23 138:10 140:20 144:10,21 146:12,20,25 148:16,17,24 150:17 151:10,19 152:21 159:9,12 165:22 166:1 172:8 174:4 178:9 189:9 watch 21:16 76:8	76:12 137:25 138:2 171:9 181:24 watched 76:10 117:6,24 125:5 167:5 171:5 173:25 watching 4:9 76:16 137:17 139:15 145:11 172:23 173:19 174:9 water 113:24 waves 158:8 way 3:14 13:16 15:20 16:10 21:23 31:22 34:1 35:9 48:21 55:15 58:12,22 61:13 67:5 71:15 72:2 72:5,6 111:6 143:23 144:4 145:16,17 151:16 154:6 165:8 167:22 171:25 189:18 ways 12:18 22:12 86:14 175:9 we're 39:22 54:24 161:17 We've 155:17 weapon 103:4 106:12 weapons 160:11 Webb 190:16 week 65:3 84:15 146:17,17 151:1 151:12 155:23 week' 54:7 weeks 3:24 6:10,13 6:15,20,24 57:8 78:19 146:7,24 weighs 2:13 weight 92:1 welfare 68:21 100:5 130:18 well-being 43:17 went 18:1 28:14 38:1 54:6,6 55:5	55:13 60:21,25 66:10 81:10 93:14 100:12 102:16 121:12,13 130:22,23 135:22 143:12 157:7,9 157:12 158:4 167:16 weren't 9:4,10 11:15,24 24:24 44:12 45:15,16 47:9 52:11 53:13 56:10,14 62:16 63:16 65:14 76:24 112:12 138:13 149:9 153:13 165:20 177:3 181:1 186:14 whatsoever 43:17 78:2 whichever 47:17 whilst 8:18 18:22 32:1 76:12 178:25 whining 27:2,4 30:3 62:4 whistleblowing 158:12 white 62:24 122:16,17 who've 11:11 wholeheartedly 182:22 Williams 152:23 154:3,5,15,24 156:25 158:4 willing 8:11,15 9:3 101:8 177:16 window 65:9,13,20 109:18 windows 55:21 65:10 winds 54:18 wing 6:9,10,12,16 6:18,18,21,24 7:2 7:6,14,15 9:6,9 10:22,23 11:5,12 11:17,17 12:17	15:11 16:18,20 24:2,12,17,19 25:20,21 26:3 36:3,6 38:16 43:18,21 47:7 52:1,4,6,6,8,12 52:13 53:18 57:1 57:2 59:6 60:3 63:17,21 64:8 66:8 68:20 74:7 82:15 84:3,3 87:16,20,21 88:16,17,21 89:11,12,13 92:12 93:12,16 93:22 94:11,22 94:23 96:1,15 98:11 99:14 101:3 104:8 106:21 107:1 108:11,13,14 109:11,15,16 111:8,9,16 112:7 116:19 132:1 134:8 135:22 139:20,23,24 146:14,20 150:1 150:1 151:18 152:14 153:8,17 157:13,23 158:18 158:20 160:4,14 161:1,2,3 165:13 188:16,20 wings 7:8 9:8 11:3 11:14,15,24 24:22 25:19,22 81:18,20,23 82:5 88:7 wish 28:2 190:1 wished 151:19 withdrew 79:24 witness 2:2 35:7 43:7,8 45:6 46:22 47:23 58:25 79:24 80:21 100:13 141:3 142:10 146:1 148:3,25 150:9,23 152:11	154:3 158:17 160:13 166:17 167:3 180:1,8 witnesses 14:4 17:11 30:7 witnessing 141:1 woken 66:1 wondered 50:4 word 1:17 31:10 63:6 67:17,24 117:24,25 118:1 118:2,17 145:4 156:24 162:17 words 31:8,16,19 38:8 79:14 88:15 118:21 139:7 156:23 181:20 work 2:4,7 5:22 9:7,22 23:9 40:6 41:15 42:3 75:6 75:11,19 76:7 77:1 81:11 83:16 84:13,15,15 88:3 88:4 149:11,20 149:21 170:2 186:17 work/life 83:14 worked 1:19 9:6 81:6 82:22 89:14 92:13,15 128:8 128:15 139:20 142:23 143:2,10 149:19,25 153:17 180:14 190:6 workers 26:4 working 2:10 3:2 3:17,18 14:2,17 15:10,11 17:25 25:21 32:8 41:18 41:25 43:21,24 46:24 47:7,13 71:21,22,23 84:8 87:15,17 88:2 89:10 128:12,17 141:9 143:4,5,24 143:24 145:2,5 145:21 146:3 149:16 154:13 160:25 180:7
--	---	--	--	---

works 151:3	98:13 101:25	160:9,9,21	11 100:19 149:1	171 49:21
worried 26:18,22	103:7,21 106:20	164:12,14 165:17	11.28 69:4	175 51:23
167:19	107:7	170:25 171:10,10	11.38 69:6	18 20:1 88:11
worries 125:2	Yates's 104:4	175:4 177:14	11.52 80:5	104:4 150:8
worry 84:23	yeah 2:10 3:12,13	178:18,18 179:11	110 158:20	183 60:18 63:5
139:15 158:25	4:12 5:13 6:4,4,7	179:25,25 180:11	1112 135:12	186 60:18
160:10,11	6:7 8:8,8 9:8,12	185:8 186:15	112 169:5	188 64:4
worse 155:11	9:12,25,25 11:8	187:11,15 190:5	116 109:23 110:5	189 64:10
167:17,19 177:14	12:18,22 14:8	year 62:21 65:3	12 73:13 142:20	
worst 48:1 57:10	15:2 16:3,3,7,11	76:11 82:23	150:8 179:1	2
wouldn't 6:14,14	16:20 17:8,14,15	years 15:1 34:4	12.10 80:2	2 26:9 37:16 80:22
18:15,17 25:15	17:19,22,24,24	45:25 46:6 93:20	12.12 80:7	82:12 101:16,20
44:4,19,21 53:19	19:2,5,12 20:4,8	93:25 136:2	120 158:21 160:19	101:22 110:17
56:3 60:2 61:12	20:22,22 22:14	143:13 147:14,17	122 149:1	114:11 120:14
63:21 64:13	22:14,18 23:10	149:22 176:4	123 121:6,11 149:2	180:20 181:13
72:10 85:2 86:11	23:17,17,17 25:1	187:14	125 121:6	2.00 120:9,18
86:21 88:6 90:21	25:5,5,11 27:17	Yep 73:14	126 71:1	2.27 142:2
94:23 105:21,21	29:2 30:16 32:21	You' 38:1	128 71:2	2.45 141:25 142:4
108:9 112:5,18	33:16,17 35:23	young 145:18	13 45:5 46:6,12,12	20 4:17 37:22
118:2 133:7,11	36:2 37:3,3,11	148:9 154:7	95:12 144:17	89:19 110:18
133:12 139:13,24	38:1 39:11 42:11		134 21:12	158:20,21 168:18
144:17 149:16,19	42:11 53:1,1	Z	136.17 168:8	201 75:4,9
166:10 175:2,13	54:18 55:1 56:13	Zaynab 26:8 30:18	137.17 114:11	2015 1:20 47:25
175:13,20 176:11	56:21,21,24	33:5 168:8 169:4	14 8:9 95:24	142:20 161:22
178:10,12,18	57:18,18,18 63:8	172:13	122:21 129:14	2016 49:6,22 81:9
179:11	65:11 66:16,16	zombies 180:9	142 191:12,14	82:23
wrapped 163:18	66:20 67:2 68:6		149 33:18	2017 1:23 4:2
wrapping 164:6	68:17 69:23	0	15 4:17 39:20 80:2	47:19 57:22,23
Wright 102:3,3	71:23,25 72:14	0.5 168:9 171:11	100:7 134:13,17	66:18 77:2 81:9
106:24	74:1 76:4,4,11,18	00:25 181:25	141:24 172:14,17	82:10,11 88:9
wrist 103:10,11	76:23,23 81:14	00:45 181:25	177:9	93:9,12 95:9
write 73:6 94:7,11	81:16 82:17	04/05 100:10	152 35:7	96:1 109:22,25
116:1 117:19	84:19 86:24 87:4		1527 98:10	120:22 129:14
118:15 135:19	87:18,18,21 89:7	1	1527's 98:7	134:13 142:20
writing 94:6	91:25 94:4	1 80:20 96:2 135:9	16 39:20 53:9	143:19 161:23
written 29:20	124:18 125:2,2	136:10,13,20	100:9 172:14,17	166:14
57:25 94:3 95:24	125:16 126:23	137:6,12 180:20	161 38:20	2018 1:20 61:8
105:5 110:14,20	128:1,10 130:23	182:4 191:2,4	163 129:17	2020 81:10
wrong 8:12 33:8	136:13,20 137:13	1.00 120:6,16	167 131:23	2022 1:1 80:22
34:24 51:2 95:15	138:8 141:7	1:25 168:9 171:11	168 47:22 129:17	142:11 190:22
145:4	143:18 144:1,20	10 7:22 52:14	169 49:5	209 111:10,16
wrote 93:25	144:20 145:3,21	110:15 190:14,19	172:7:1	116:19
107:22	148:21,22,23	10.00 1:2 190:22	17:00 116:17	20s 83:3
	149:23 150:3	100 89:11 123:14	17:15 96:1	21 37:23 111:4
X	151:24 153:18	102 158:20	17:20 101:1	116:16
X 190:25	154:2,17,23	103 189:24	17:23 96:21 101:4	216 35:20
	155:8,11,12	104 59:13 93:10,23	17:25 95:9	218 35:22
Y	156:14,22 157:20	108:3	17:26 98:9	22 6:9,19
Yan 92:7,11,15	157:20 158:8,10	105 93:23	17:40 99:15	23 37:25
Yates 96:3,7 98:8		107 93:10		24 60:25 91:6

94:12 145:21 166:17 184:14 249 119:6 25 37:25 93:10 108:4 252 184:6 26 93:10 95:20 113:15 127:4 26/4/2017 95:15 260/261 119:19 27 106:16 142:20 166:18 28 57:23 59:2,4 107:8 109:22 29 60:21 61:12 84:10	475 177:8 48 92:10 140:23 152:12 49 84:15 4th 95:21 <hr/> 5 5 26:8 51:4,6 53:10 82:11 83:20 109:22,25 120:22 181:12 50 2:17 <hr/> 6 6 33:6 53:12 65:21 95:5 120:24 124:12 172:16 180:20 188:3 6,500 162:9 613 41:1 68 17:16 69 149:1 <hr/> 7 7 1:1 34:25 180:20 184:13 72 147:10 74 73:21 75 73:21 88:12 106:17 76 23:8 88:12 764 184:14 77 191:6 78 23:18 188:3 79 107:8 <hr/> 8 8 5:25 34:22 84:11 84:17,23 85:17 85:18,19 102:11 146:1 181:12 184:4,4 190:22 8.00 85:22 80 23:18 191:8,10 84 89:18 87 167:4 188:3 89 166:18 <hr/> 9 9 84:17,23 142:11	184:4 90 90:4 166:18 921 128:3 923 128:3 94 69:14 96 166:18 98 166:18		
--	--	---	--	--