

<p>1 Tuesday, 15 March 2022</p> <p>2 (10.00 am)</p> <p>3 MS MOORE: Good morning, chair. We start today with</p> <p>4 evidence from Mr Castle.</p> <p>5 MR IAN DEREK CASTLE (affirmed)</p> <p>6 Examination by MS MOORE</p> <p>7 MS MOORE: Good morning, Mr Castle.</p> <p>8 <b>A. Good morning.</b></p> <p>9 Q. Can we have your full name, please?</p> <p>10 <b>A. Ian Castle.</b></p> <p>11 Q. You should have a folder of documents in front of you</p> <p>12 and I may refer you to those or show you them up on the</p> <p>13 screen that is front of you. You have also provided us</p> <p>14 with two witness statements -- the first is at tab 1 and</p> <p>15 the second is at tab 2. They will be adduced in full,</p> <p>16 please. The reference for the first, which was signed</p> <p>17 on 4 November 2021, is &lt;INQ000056&gt; and the second, which</p> <p>18 you signed on 1 February 2022, is &lt;HOM0332049&gt;. What it</p> <p>19 means by adducing those is we don't have to go through</p> <p>20 everything that you wrote in them, that's already your</p> <p>21 evidence. I am going to ask you about some specific</p> <p>22 matters that arise from the statements.</p> <p>23 <b>A. Okay.</b></p> <p>24 Q. First to your role at Brook House, particularly during</p> <p>25 the relevant period. I understand, as to your</p> <p style="text-align: center;">Page 1</p>	<p>1 <b>A. (Witness nods).</b></p> <p>2 Q. From the Home Office?</p> <p>3 <b>A. That's correct.</b></p> <p>4 Q. On a day-to-day basis, you say you were responsible for</p> <p>5 overseeing that team which monitored contract</p> <p>6 compliance?</p> <p>7 <b>A. That's correct.</b></p> <p>8 Q. It is known sometimes as the compliance team?</p> <p>9 <b>A. That's right.</b></p> <p>10 Q. They initially monitored the contract with G4S and then,</p> <p>11 of course, the contract with Serco when they took over?</p> <p>12 <b>A. That's right.</b></p> <p>13 Q. We will be hearing this afternoon from Mr Paul Gasson.</p> <p>14 Where did he fit into your team?</p> <p>15 <b>A. He was the compliance manager, so he was one of</b></p> <p>16 <b>the HEOs.</b></p> <p>17 Q. You were line managed by Michelle Smith, I believe?</p> <p>18 <b>A. That's right.</b></p> <p>19 Q. I understand this was your first role in immigration</p> <p>20 detention?</p> <p>21 <b>A. It was, and my first role as a manager.</b></p> <p>22 Q. And your first role as well in contractual compliance?</p> <p>23 <b>A. Indeed.</b></p> <p>24 Q. You say in your second witness statement, at page 10,</p> <p>25 that you had no training pertinent to the role and you</p> <p style="text-align: center;">Page 3</p>
<p>1 background, you have been a Home Office employee from</p> <p>2 2002 until April 2021?</p> <p>3 <b>A. That's correct.</b></p> <p>4 Q. And now you're with the Department of Education?</p> <p>5 <b>A. I am, yes.</b></p> <p>6 Q. Your full employment history you set out at page 2 of</p> <p>7 your first statement, but, in summary, you had roles in</p> <p>8 immigration, which included charter flights, you had</p> <p>9 a role in anti-terrorism. Then, in 2014, in financial</p> <p>10 crime?</p> <p>11 <b>A. That's right.</b></p> <p>12 Q. And your Brook House role began in July 2017. But, in</p> <p>13 fact, you started there in August 2017?</p> <p>14 <b>A. Yes. I was on annual leave for the first couple of</b></p> <p>15 <b>weeks.</b></p> <p>16 Q. As you say, at paragraph 8 on page 2, effectively</p> <p>17 from August 2017, after your leave, until April 2021,</p> <p>18 you were detention and escorting services, so DES, area</p> <p>19 manager for the Gatwick IRCs, which included</p> <p>20 Brook House?</p> <p>21 <b>A. That's right, yes.</b></p> <p>22 Q. You had a team of HEOs, so that's higher executive</p> <p>23 officers?</p> <p>24 <b>A. That's right.</b></p> <p>25 Q. And EOs, executive officers?</p> <p style="text-align: center;">Page 2</p>	<p>1 confirm at 35, paragraph 35 of your first statement,</p> <p>2 specific contract management training would have been</p> <p>3 extremely useful?</p> <p>4 <b>A. Yes.</b></p> <p>5 Q. But you didn't have any?</p> <p>6 <b>A. No.</b></p> <p>7 Q. You say "specific", but, in fact, did you receive any,</p> <p>8 even general, training regarding contract compliance?</p> <p>9 <b>A. Not that I recall, no.</b></p> <p>10 Q. What about in assessing service delivery generally?</p> <p>11 <b>A. No. I suppose the closest I might have got would be</b></p> <p>12 <b>advice to bone up on the Detention Service Orders.</b></p> <p>13 Q. So you had -- you were advised to look into the legal</p> <p>14 framework of immigration detention?</p> <p>15 <b>A. Yes.</b></p> <p>16 Q. Did you have training on that or were you told to read</p> <p>17 into them?</p> <p>18 <b>A. No specific training.</b></p> <p>19 Q. So you took it upon yourself to read into the DSOs,</p> <p>20 having been advised?</p> <p>21 <b>A. Yes.</b></p> <p>22 Q. You say at your second witness statement that you do</p> <p>23 recall getting support from your line manager, but it</p> <p>24 seems to have been about sort of management style</p> <p>25 leadership, so advice on how to manage a team and things</p> <p style="text-align: center;">Page 4</p>

<p>1 like that?</p> <p>2 <b>A. Predominantly, yes.</b></p> <p>3 Q. So going on to the nature of your role, in your first</p> <p>4 witness statement at paragraph 12, you say there was no</p> <p>5 formal job specification?</p> <p>6 <b>A. Not that I recall seeing at all.</b></p> <p>7 Q. Did you take over from someone else or was it a sort of</p> <p>8 new role?</p> <p>9 <b>A. There had been somebody in post previously. I can't</b></p> <p>10 <b>remember the chap's name. I believe he left before</b></p> <p>11 <b>I started. So there was no handover or anything like</b></p> <p>12 <b>that.</b></p> <p>13 Q. I understand, as you say, your role included compliance,</p> <p>14 so attending monthly compliance meetings; is that right?</p> <p>15 <b>A. With the service provider, yes.</b></p> <p>16 Q. Which was G4S at the time when you started?</p> <p>17 <b>A. Yes.</b></p> <p>18 Q. And overseeing, as you said, the work of the rest of</p> <p>19 the compliance team?</p> <p>20 <b>A. Yes.</b></p> <p>21 Q. I understand that they would also attend other meetings</p> <p>22 and produce reports and similar?</p> <p>23 <b>A. Yes, yes.</b></p> <p>24 Q. In April 2018, you were interviewed by Verita, and we</p> <p>25 have the notes there. You said that when you joined</p> <p style="text-align: center;">Page 5</p>	<p>1 2016 HMIP inspection of Brook House, so that's a report</p> <p>2 by HMIP that's dated January 2017 but it relates to</p> <p>3 events in 2016. In that report, HMIP had made a number</p> <p>4 of recommendations directed specifically to the</p> <p>5 Home Office. Some were about casework but others were</p> <p>6 about the physical conditions of Brook House, the</p> <p>7 process for managing detainees at risk of self-harm and</p> <p>8 suicide, detainees' access to legal advice, welfare</p> <p>9 checks, activity provision, and you say at paragraph 29</p> <p>10 of your first statement that you don't recall seeing the</p> <p>11 HMIP report before you began your role?</p> <p>12 <b>A. Mmm.</b></p> <p>13 Q. Did you know what HMIP was before you started at</p> <p>14 Brook House?</p> <p>15 <b>A. No.</b></p> <p>16 Q. Do you know when you became aware of HMIP?</p> <p>17 <b>A. Probably not long after I started.</b></p> <p>18 Q. Did you know about any kind of scheme of independent</p> <p>19 oversight of detention centres before you started?</p> <p>20 <b>A. I may have had an inkling, shall we say. I assumed that</b></p> <p>21 <b>there was some sort of oversight externally.</b></p> <p>22 Q. But you didn't know the specifics?</p> <p>23 <b>A. No.</b></p> <p>24 Q. The HMIP report that I just mentioned, as well as the</p> <p>25 conclusions I set out there, also found, in 2016, high</p> <p style="text-align: center;">Page 7</p>
<p>1 Brook House in August 2017, you had come from an</p> <p>2 immigration officer role and you described it as</p> <p>3 a double promotion. So was that a significant leap in</p> <p>4 responsibility?</p> <p>5 <b>A. Yes. So, as an immigration officer, that's EO grade,</b></p> <p>6 <b>and then my -- the post that I was fortunate enough to</b></p> <p>7 <b>get, SEO. So I missed the HEO grade.</b></p> <p>8 Q. I see. You said:</p> <p>9 "It was quite a steep learning curve for me and</p> <p>10 continues to be so."</p> <p>11 <b>A. Yes, both from management and the actual job itself.</b></p> <p>12 Q. As we have heard, a learning curve without any real</p> <p>13 training or instruction given to you, other than that</p> <p>14 which you took it upon yourself?</p> <p>15 <b>A. Yes.</b></p> <p>16 Q. You described your role in a nutshell to Verita at</p> <p>17 page 2 of that transcript as:</p> <p>18 "I try to ensure that the contract process is</p> <p>19 followed and that G4S basically do what they're supposed</p> <p>20 to do."</p> <p>21 <b>A. In a nutshell, yes.</b></p> <p>22 Q. In other words, that they fulfil their contractual</p> <p>23 obligations to the Home Office?</p> <p>24 <b>A. Yes.</b></p> <p>25 Q. You were asked to comment in your statement about the</p> <p style="text-align: center;">Page 6</p>	<p>1 numbers of detainees feeling suicidal and depressed. It</p> <p>2 was nearly half of them on arrival. Constant</p> <p>3 supervision cells were in a poor state and unsuitable</p> <p>4 for detainees in crisis. Found that there was no</p> <p>5 effective arrangements to monitor vulnerability over</p> <p>6 time, despite the long average cumulative period of</p> <p>7 detention. With hindsight now, by looking back, do you</p> <p>8 consider that those issues were relevant to your</p> <p>9 operational role at Brook House?</p> <p>10 <b>A. I suppose, yes, they could have been certainly given</b></p> <p>11 <b>consideration.</b></p> <p>12 Q. Do you recall whether you read the IMB's 2016 report</p> <p>13 before you started in your role, so the Independent</p> <p>14 Monitoring Board?</p> <p>15 <b>A. I don't recall.</b></p> <p>16 Q. That report, which you have at your tab 14, found that</p> <p>17 certain periods of lower staffing levels during that</p> <p>18 year, so during 2016, had impacted adversely on both</p> <p>19 staff motivation and on the operation of the centre. As</p> <p>20 you, I think, acknowledged in your Verita interview, you</p> <p>21 said that staffing, since day one, has been an issue --</p> <p>22 so the first day that you joined, I guess -- and at the</p> <p>23 time of your interview, which, as I said,</p> <p>24 was April 2018, hadn't shown signs of improving. So in</p> <p>25 both of your statements, you comment now on staffing</p> <p style="text-align: center;">Page 8</p>

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<p>1 levels. I think you say that, with more staff, there</p> <p>2 would be fewer incidents?</p> <p>3 <b>A. Possibly fewer incidents; certainly easier to manage,</b></p> <p>4 <b>and would help with the general running of the centre.</b></p> <p>5 <b>So if you've got half the staff -- half the DCO staff</b></p> <p>6 <b>dealing with an incident, that means the other half of</b></p> <p>7 <b>the staff are missing from the rest of the centre.</b></p> <p>8 Q. So you can't run the activities, things --</p> <p>9 <b>A. Potentially, yes.</b></p> <p>10 Q. Things might move slower in terms of greater waiting</p> <p>11 times for things like food, maybe?</p> <p>12 <b>A. You also will be missing out on the potential support</b></p> <p>13 <b>for the detainees, and you may find that if a DCO is</b></p> <p>14 <b>missing from a wing because he is dealing with an</b></p> <p>15 <b>incident elsewhere, you may find that there's an</b></p> <p>16 <b>incident on that original wing.</b></p> <p>17 Q. So they could have an effect on not just the kind of</p> <p>18 day-to-day life, but individual safety issues?</p> <p>19 <b>A. Yes.</b></p> <p>20 Q. More staff would be safer, so fewer staff is less safe.</p> <p>21 Is that for both staff and detainees?</p> <p>22 <b>A. Yes.</b></p> <p>23 Q. In summary, then, thinking back now to the period when</p> <p>24 you started at Brook House, did you consider that the</p> <p>25 staffing levels were inadequate?</p> <p style="text-align: center;">Page 9</p>	<p>1 delivered in line with the contract, was it your job to</p> <p>2 say so?</p> <p>3 <b>A. Yes, and it was part of discussions. I go back to,</b></p> <p>4 <b>in August -- when I started in August 2017, I obviously</b></p> <p>5 <b>wasn't aware of the staffing levels, and my</b></p> <p>6 <b>opportunities to discuss them were rather pre-empted by</b></p> <p>7 <b>Panorama. But they were part of discussions ongoing</b></p> <p>8 <b>about how G4S might be able to solve this issue, about</b></p> <p>9 <b>their recruitment processes and, also, there -- if</b></p> <p>10 <b>I recall correctly, there was a new contract being</b></p> <p>11 <b>discussed. I think the contract with G4S was coming</b></p> <p>12 <b>towards an end, so I was -- although I wasn't party to</b></p> <p>13 <b>those discussions, I was aware that staffing levels --</b></p> <p>14 <b>or I believed that staffing levels were being discussed</b></p> <p>15 <b>for the new contract.</b></p> <p>16 Q. Who was having those discussions?</p> <p>17 <b>A. That would probably have been commercial and senior</b></p> <p>18 <b>managers.</b></p> <p>19 Q. Commercial? The Home Office?</p> <p>20 <b>A. Sorry, the Home Office commercial team.</b></p> <p>21 Q. Led by Michelle Smith?</p> <p>22 <b>A. No. I can't remember who the manager was, but I used to</b></p> <p>23 <b>liaise with a chap called Maneer(?) in the Home Office.</b></p> <p>24 <b>He was my sort of equivalent grade within the commercial</b></p> <p>25 <b>team.</b></p> <p style="text-align: center;">Page 11</p>
<p>1 <b>A. I did.</b></p> <p>2 Q. Both statements suggest that you never raised thoughts</p> <p>3 about staffing with your line manager or anyone, indeed.</p> <p>4 If we look at your second statement, so behind tab 2,</p> <p>5 page 10. At paragraph 41, you say:</p> <p>6 "I did not raise any concerns regarding staffing</p> <p>7 levels with my line management chain, as I did not think</p> <p>8 increasing staff levels was an available option due to</p> <p>9 contractual and budget constraints. I also believe that</p> <p>10 they were already aware of the issues and I assumed that</p> <p>11 they were party to discussions around staffing levels</p> <p>12 during monthly and/or quarterly review meetings. It was</p> <p>13 the responsibility of G4S to deliver the staffing levels</p> <p>14 required by the contract. My comment regarding staffing</p> <p>15 levels being dictated by costs was based on a belief</p> <p>16 that the constraints of the contract meant staffing</p> <p>17 levels were set."</p> <p>18 So levels of staff were set. So you say it was the</p> <p>19 responsibility of G4S to deliver the staffing levels</p> <p>20 required by the contract?</p> <p>21 <b>A. Yes.</b></p> <p>22 Q. But it was your responsibility, wasn't it, to monitor</p> <p>23 the contract?</p> <p>24 <b>A. It was.</b></p> <p>25 Q. If you were concerned that staffing was not being</p> <p style="text-align: center;">Page 10</p>	<p>1 Q. So your view was that other people were talking about</p> <p>2 staffing?</p> <p>3 <b>A. Yes. I was too.</b></p> <p>4 Q. But not with your line manager?</p> <p>5 <b>A. No -- we were discussing them, but not necessarily</b></p> <p>6 <b>coming to any conclusion.</b></p> <p>7 Q. Just acknowledging that there could be more staff?</p> <p>8 <b>A. Yes.</b></p> <p>9 Q. As I have read just now from line 41 of your second</p> <p>10 statement, you said:</p> <p>11 "I did not raise any concerns raising staffing</p> <p>12 levels with my line management chain as I did not think</p> <p>13 increasing staffing levels was an available option due</p> <p>14 to contractual and budget constraints."</p> <p>15 So there might have been contractual and financial</p> <p>16 reasons why there couldn't be more staff?</p> <p>17 <b>A. Quite possibly.</b></p> <p>18 Q. Can I just ask to show on the screen &lt;VER000268&gt; at</p> <p>19 page 14, please. This is from your interview with</p> <p>20 Verita that I already mentioned. 227. Mr Marsden, who</p> <p>21 is one of the interviewers from Verita, asks you:</p> <p>22 "Having had this conversation, do you think there</p> <p>23 are things that the Home Office could do that would get</p> <p>24 them? Could you apply more pressure, and I don't mean</p> <p>25 fines, but 'Have you thought about this?' or 'Let's help</p> <p style="text-align: center;">Page 12</p>

<p>1 you fix that problem?"</p> <p>2 You discuss that detention is contentious and then</p> <p>3 you say:</p> <p>4 "I honestly think that the Home Office would be</p> <p>5 prepared to pay, to spend more, so the encouragement</p> <p>6 from the Home Office will be, 'You need to consider X</p> <p>7 and we are prepared to pay for it', because I think</p> <p>8 possibly the pushback or the expectations were 'Who is</p> <p>9 going to pay for this?' By far and away the most</p> <p>10 important thing is the staff numbers."</p> <p>11 Was it your view then, or any time after you</p> <p>12 started, that the Home Office would have been willing to</p> <p>13 spend more on staffing?</p> <p>14 <b>A. I think I would be referring here to the new contract,</b></p> <p>15 <b>and where the Home Office would be looking to increase</b></p> <p>16 <b>numbers within the new contract, rather than reviewing</b></p> <p>17 <b>the old contract.</b></p> <p>18 Q. So you thought that the Home Office might, going</p> <p>19 forward, have more to spend on staffing?</p> <p>20 <b>A. Yes.</b></p> <p>21 Q. But it wasn't part of your role, I think, from what</p> <p>22 I have understood from what you have suggested, to be</p> <p>23 part of the discussions around staffing levels, because</p> <p>24 that was left to commercial?</p> <p>25 <b>A. We did have discussions in our meetings with G4S. You</b></p> <p style="text-align: center;">Page 13</p>	<p>1 I understand that, out of that annual revenue, G4S must</p> <p>2 pay all of its costs, including its subcontract costs.</p> <p>3 Performance measurement with the contract was by way</p> <p>4 of monthly self-reporting by G4S of any failures, and</p> <p>5 that was against 30 performance measurements, and</p> <p>6 compliance checks were done by the Home Office, so your</p> <p>7 team. A failure to meet any of those performance</p> <p>8 measurements can result in a deduction to the monthly</p> <p>9 fee, and that's either a fixed amount for certain very</p> <p>10 serious failings or a variable fee calculated on the</p> <p>11 basis of performance points for less serious failings.</p> <p>12 So, in very brief, every failure reduces the monthly</p> <p>13 payment from the Home Office to G4S?</p> <p>14 <b>A. That would be, yeah, correct.</b></p> <p>15 Q. Provided that it's been reported and unless it's been</p> <p>16 mitigated?</p> <p>17 <b>A. Yes.</b></p> <p>18 Q. Can we have on the screen, please, the NAO report</p> <p>19 &lt;DL0000175&gt; at page 28. This was a report undertaken by</p> <p>20 the National Audit Office and it is dated July 2019. If</p> <p>21 we go to page 28 of that document. This is where you</p> <p>22 come in, I believe. Figure 12, "Home Office oversight</p> <p>23 of Brook House". So there is daily, weekly, monthly and</p> <p>24 quarterly levels of the oversight provided. Just</p> <p>25 looking at the weekly entry there, so there is daily --</p> <p style="text-align: center;">Page 15</p>
<p>1 <b>know, we would discuss their recruitment processes,</b></p> <p>2 <b>their turnover and the suchlike. I didn't have, due to</b></p> <p>3 <b>my inexperience within the detention arena, I didn't</b></p> <p>4 <b>have any idea of what they might or could do to ensure</b></p> <p>5 <b>that the staffing levels were sufficient.</b></p> <p>6 Q. I want to ask about another area of contractual</p> <p>7 performance, then. So staffing is one metric by which</p> <p>8 you can monitor adherence to the contract, because the</p> <p>9 contract provides for a certain level of people at</p> <p>10 different grades. But your team also dealt with other</p> <p>11 aspects of contractual performance, all of them. The</p> <p>12 contract, as I understand it, between the Home Office</p> <p>13 and G4S, although it was initially signed with GSL, is</p> <p>14 an output contract, so a contract that focuses on the</p> <p>15 deliverables. The specification requires high-level</p> <p>16 requirements and G4S undertakes to provide them, rather</p> <p>17 than being the sort of contract where the way in which</p> <p>18 those things are delivered is specified with a lot of</p> <p>19 detail.</p> <p>20 <b>A. Yes.</b></p> <p>21 Q. Is that a fair summary of how the contract works?</p> <p>22 <b>A. I think so, yes.</b></p> <p>23 Q. The total lifetime value of the contract was</p> <p>24 £137.5 million, and G4S's revenue in 2018, so the first</p> <p>25 full year that you were involved, was £12.8 million.</p> <p style="text-align: center;">Page 14</p>	<p>1 the onsite compliance team, and we will be hearing more</p> <p>2 from them. There is weekly involvement with the onsite</p> <p>3 compliance team, where they have working level meetings</p> <p>4 to discuss performance points, possible mitigating</p> <p>5 circumstances and other issues. Did you attend those</p> <p>6 weekly meetings, if you can recall?</p> <p>7 <b>A. I may have attended one or two later on, but certainly,</b></p> <p>8 <b>I wouldn't have thought, for the first few months of my</b></p> <p>9 <b>career at Brook.</b></p> <p>10 Q. Do you know who from your team -- either the name or the</p> <p>11 level they were at -- would attend?</p> <p>12 <b>A. That would have been compliance manager's role, so</b></p> <p>13 <b>Paul Gasson and, subsequently, Simon Murrell took over</b></p> <p>14 <b>from Paul.</b></p> <p>15 Q. Then we see the monthly meetings, so commercial and</p> <p>16 onsite compliance team attends monthly operational</p> <p>17 review meetings to discuss performance, finances, action</p> <p>18 plans and possible changes to the contract.</p> <p>19 So the meetings might include discussions of</p> <p>20 possible changes to the contract. Would this be the</p> <p>21 forum in which to say, for example, "We need more</p> <p>22 staff"?</p> <p>23 <b>A. Staffing levels would have been discussed, I'm sure.</b></p> <p>24 <b>But I think the changes to the contract would probably</b></p> <p>25 <b>be more around the facilities, you know, any changes to</b></p> <p style="text-align: center;">Page 16</p>

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<p>1 <b>the environment, any introduction of new activities,</b></p> <p>2 <b>that may have had a cost that the Home Office would</b></p> <p>3 <b>consider paying.</b></p> <p>4 Q. Mr Gasson, who we will be hearing from later, in his</p> <p>5 statement to the inquiry, says that weekly meetings</p> <p>6 would raise issues or failures from both sides, and</p> <p>7 monthly meetings would include the agreed performance</p> <p>8 points from the previous month's performance. So at</p> <p>9 a weekly basis, you look at what happened that week, by</p> <p>10 the sounds of it; and, on a monthly basis, consider the</p> <p>11 performance points for the whole --</p> <p>12 <b>A. I think the monthly basis would be more of an overview.</b></p> <p>13 <b>So any issues that had been repeated across the month</b></p> <p>14 <b>may be discussed.</b></p> <p>15 Q. Did you have a role, either at that meeting or</p> <p>16 generally, in agreeing the performance points which</p> <p>17 would be applied each month?</p> <p>18 <b>A. They would be -- if I recall, from 2017 and 2018, so</b></p> <p>19 <b>Paul would sometimes tell me what points had been</b></p> <p>20 <b>agreed, and then we would discuss in the monthlies</b></p> <p>21 <b>possibly specifics but, as I said, more of a general</b></p> <p>22 <b>overview.</b></p> <p>23 Q. An overview, I see. If we look, then, rather than talk</p> <p>24 about it in the abstract, at some of the specific</p> <p>25 performance indicators under the contract, so the same</p> <p style="text-align: center;">Page 17</p>	<p>1 This is a points-based performance measure. It has</p> <p>2 a penalty of 400 points per incident, which, in 2019,</p> <p>3 equated to £716, and only where it involved a failure by</p> <p>4 G4S to follow procedures for the safety of detainees.</p> <p>5 Those who were involved in compiling the report --</p> <p>6 so perhaps Mr Gasson can help us with the detail, but</p> <p>7 what we see here is that, within the monthly performance</p> <p>8 reports, which we have been provided with, there are no</p> <p>9 incidents of self-harm which give rise to points</p> <p>10 deductions. We don't see points applied for self-harm</p> <p>11 but then mitigations where G4S have said, "No, there was</p> <p>12 no failure". They're just reported as zero.</p> <p>13 For example, you have been provided with 2017</p> <p>14 performance reports which show zero untoward events</p> <p>15 under self-harm resulting in injury, whereas we have</p> <p>16 combined reports, which are provided to the IMB, which</p> <p>17 show that, in that same month, there were eight acts of</p> <p>18 self-harm by eight different individuals: three</p> <p>19 requiring treatment on site; and one requiring treatment</p> <p>20 offsite. So there are, in fact, eight acts of self-harm</p> <p>21 but none of them are reported. To be assured that the</p> <p>22 performance report is accurate in reporting none, you</p> <p>23 would need, wouldn't you, to be content that none of</p> <p>24 those acts of self-harm involved a failure by G4S?</p> <p>25 <b>A. Yes.</b></p> <p style="text-align: center;">Page 19</p>
<p>1 document but page 36, please. We see here a list of</p> <p>2 the key performance indicators. If we just scroll down</p> <p>3 a little bit so we can see the whole of 2. Some with</p> <p>4 a fixed fine and some with a fine that's based on</p> <p>5 points, as I mentioned. The value of those points,</p> <p>6 I should say, it was variable and rose with inflation.</p> <p>7 What we have here are the 2019 figures. So we can</p> <p>8 assume that in 2017 the pounds per points was slightly</p> <p>9 lower?</p> <p>10 <b>A. I would assume so.</b></p> <p>11 Q. The second entry on the table there:</p> <p>12 "Self-harm resulting in death defined as self-harm</p> <p>13 of a detainee resulting in their death, involving any</p> <p>14 failure by G4S to follow procedures for the safety of</p> <p>15 detainees."</p> <p>16 That would have given rise to a fixed penalty of</p> <p>17 £10,000 per incident, and it would require not just</p> <p>18 a death but a death where there was a failure of G4S</p> <p>19 involved.</p> <p>20 Similarly, on page 37, if we look at entry number</p> <p>21 10:</p> <p>22 "Self-harm resulting in injury defined as self-harm</p> <p>23 by a detainee requiring any form of healthcare, and</p> <p>24 involving any failure by G4S to follow procedures for</p> <p>25 the safety of detainees."</p> <p style="text-align: center;">Page 18</p>	<p>1 Q. What steps did you take to ensure that was accurate?</p> <p>2 <b>A. Personally?</b></p> <p>3 Q. Mmm-hmm.</p> <p>4 <b>A. None.</b></p> <p>5 Q. What about your team?</p> <p>6 <b>A. I don't know. I can't recall. I'm not sure whether</b></p> <p>7 <b>I even know, sorry.</b></p> <p>8 Q. We can ask Mr Gasson about it, but, having heard that</p> <p>9 and the way that the self-harm, in fact, doesn't always</p> <p>10 translate to self-harm as a performance measure, to get</p> <p>11 to that point would involve, wouldn't it, a significant</p> <p>12 level of trust in the process. So you have to trust</p> <p>13 that staff will find out about each act of self-harm to</p> <p>14 record it at all; then that they are properly recorded;</p> <p>15 and then that there is an accurate account by G4S, or</p> <p>16 someone else, of any acts or omissions that might amount</p> <p>17 to a failure.</p> <p>18 <b>A. Mmm.</b></p> <p>19 Q. You'd recognise, wouldn't you, from a purely financial</p> <p>20 perspective, that G4S were disincentivised from</p> <p>21 reporting any contract failures, because each one would</p> <p>22 cost them money?</p> <p>23 <b>A. Yes.</b></p> <p>24 Q. So it's vital to ensure that, despite that, they</p> <p>25 nevertheless accurately self-report failures?</p> <p style="text-align: center;">Page 20</p>

<p>1 <b>A. It is.</b></p> <p>2 Q. Part of that must include a process by which the</p> <p>3 Home Office can check that they are accurately</p> <p>4 self-reporting?</p> <p>5 <b>A. I think the problem that we would have there would be,</b></p> <p>6 <b>if something is not reported, that method is the only</b></p> <p>7 <b>way that we have, short of having -- either having</b></p> <p>8 <b>a member of staff with each of the G4S members of staff</b></p> <p>9 <b>walking around to make sure that they're being</b></p> <p>10 <b>straightforward and honest, or to review every moment of</b></p> <p>11 <b>CCTV and body-worn cameras during a day. So, yes, we</b></p> <p>12 <b>did rely on honesty and integrity from G4S.</b></p> <p>13 Q. Could you not audit some of the instances, although not</p> <p>14 all of them? You don't need to watch every CCTV, but</p> <p>15 you could pick a day in a month to do so and ensure that</p> <p>16 the checks that day were correct?</p> <p>17 <b>A. I can't be sure, but I think we did dip sample use of</b></p> <p>18 <b>force reports and suchlike.</b></p> <p>19 Q. Yes.</p> <p>20 <b>A. But I can't remember, I'm sorry.</b></p> <p>21 Q. We will come to the dip sampling of use of force</p> <p>22 reports, because you do mention that in your statement.</p> <p>23 But just staying just for now with the self-harm</p> <p>24 records, during the relevant period, so the five months</p> <p>25 that we have looked at from April to August 2017,</p> <p style="text-align: center;">Page 21</p>	<p>1 <b>before. I don't know. So I can't say whether I was</b></p> <p>2 <b>aware that it was good or bad or what level was good.</b></p> <p>3 Q. Presumably, the level which is good is none.</p> <p>4 <b>A. Yes.</b></p> <p>5 Q. Because what we have in the performance points that were</p> <p>6 reported to and by your team is no performance points</p> <p>7 deductions for self-harm throughout April and going on</p> <p>8 until I think we have November 2017.</p> <p>9 <b>A. Okay. So no reports at all?</b></p> <p>10 Q. None that were reported under this scheme that only</p> <p>11 requires reporting of self-harm resulting in injury</p> <p>12 where there is a failure by G4S.</p> <p>13 <b>A. Were any mitigated? Sorry, I shouldn't be asking you</b></p> <p>14 <b>questions.</b></p> <p>15 Q. No, no, that's fine. No mitigations. Zero reporting at</p> <p>16 all.</p> <p>17 <b>A. I have got no explanation for that.</b></p> <p>18 Q. If you had have known that the level of self-harm was</p> <p>19 two or three a week and that there had never been,</p> <p>20 during that period, any performance points under</p> <p>21 measures 10 reported to you, would you have seen that as</p> <p>22 an anomaly?</p> <p>23 <b>A. Probably.</b></p> <p>24 Q. But, as far as you know, that information hadn't</p> <p>25 occurred to you or been provided to you?</p> <p style="text-align: center;">Page 23</p>
<p>1 combined reports, so the reports that were provided to</p> <p>2 the IMB, recorded 60 acts of self-harm, so two to three</p> <p>3 a week, and I know you started in August 2017, but the</p> <p>4 same pattern then continued. So looking at August</p> <p>5 to December, again, 60 acts of self-harm in five months.</p> <p>6 Were you aware of this level of self-harm at</p> <p>7 Brook House?</p> <p>8 <b>A. So, forgive me, because I can't remember, but the</b></p> <p>9 <b>reports that were given to the IMB by G4S?</b></p> <p>10 Q. They're combined reports. G4S and Home Office agree the</p> <p>11 figures and provide them to the IMB for the meetings.</p> <p>12 <b>A. Okay. Sorry, can you repeat the question?</b></p> <p>13 Q. Sure. During the relevant period, the data that we</p> <p>14 have, which is from those reports as well as elsewhere,</p> <p>15 shows that, during the period we are looking at, there</p> <p>16 were 60 acts of self-harm over five months, and</p> <p>17 I just -- because you weren't there for the whole of</p> <p>18 the relevant period, by way of illustration, from August</p> <p>19 to December, the same sort of pattern continued, so,</p> <p>20 again, 60 acts of self-harm. I wondered whether you</p> <p>21 were aware of the level of self-harm being similar at</p> <p>22 Brook House?</p> <p>23 <b>A. I can't remember. I suppose, even if I did, I wouldn't</b></p> <p>24 <b>have a comparator, because 60 episodes of self-harm</b></p> <p>25 <b>could be a reduction. It could have been 120 the year</b></p> <p style="text-align: center;">Page 22</p>	<p>1 <b>A. I don't remember. Sorry.</b></p> <p>2 Q. By the time that you left, so in April 2021, Serco had</p> <p>3 taken over the contract?</p> <p>4 <b>A. That's correct, yes.</b></p> <p>5 Q. I understand that it was quite a similar contract, so</p> <p>6 outcome focused, and requiring a level of</p> <p>7 self-performance of failures?</p> <p>8 <b>A. Yes.</b></p> <p>9 Q. Had you taken any steps, by the time you left, to ensure</p> <p>10 that failures such as these were being adequately</p> <p>11 reported? Presumably not the 24-hour, we would have to</p> <p>12 check all the CCTV, that you described?</p> <p>13 <b>A. Not that I remember.</b></p> <p>14 Q. I want to ask you a quick question about a comment</p> <p>15 that's made by Peter Neden of G4S now. He tells us that</p> <p>16 the Home Office operated a red, amber, green rating</p> <p>17 system across all its contracts, and I wondered, were</p> <p>18 you aware of a RAG or a red/amber/green system?</p> <p>19 <b>A. In what context?</b></p> <p>20 Q. So he said, across all of the Home Office contracts,</p> <p>21 including Brook House, there was a red/amber/green</p> <p>22 rating system applied. Did you know of</p> <p>23 a red/amber/green system?</p> <p>24 <b>A. No.</b></p> <p>25 Q. We can ask the other contractual and commercial managers</p> <p style="text-align: center;">Page 24</p>

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<p>1 about that.</p> <p>2 So turning now to your knowledge of Brook House</p> <p>3 generally, I think you told Verita that you would have</p> <p>4 an occasional walk around the centre?</p> <p>5 <b>A. Yes.</b></p> <p>6 Q. Obviously you spent your time between the three Gatwick</p> <p>7 sites?</p> <p>8 <b>A. Yes. So there are two buildings to Brook House and then</b></p> <p>9 <b>at Tinsley House we had an IRC and family accommodation.</b></p> <p>10 Q. You'd spend some time in the office, presumably, so</p> <p>11 occasionally you'd go for a walk around?</p> <p>12 <b>A. In both, yes.</b></p> <p>13 Q. You told Verita that would be:</p> <p>14 "Once every couple of weeks; it depends. I might go</p> <p>15 a couple of weeks and not see anywhere, and then I might</p> <p>16 do two or three trips in a week. I don't go across the</p> <p>17 whole centre, but I would imagine that quite a few of</p> <p>18 detainees would recognise me, but my experience of the</p> <p>19 staff interaction with the detainees is, from what</p> <p>20 I have seen, okay."</p> <p>21 Then you say:</p> <p>22 "I haven't seen anyone be disrespectful."</p> <p>23 Paul Kempster, who is the chief operating officer</p> <p>24 for G4S, has made a comment to Verita -- he is talking</p> <p>25 about the SMT rather than about the Home Office, but</p> <p style="text-align: center;">Page 25</p>	<p>1 Q. Did you think it was important for you to have an</p> <p>2 experience of what it was like on the ground at the</p> <p>3 centre day to day?</p> <p>4 <b>A. It was important to me. I'm not sure that it had an</b></p> <p>5 <b>impact on my job, but I felt like I needed to be out</b></p> <p>6 <b>there and talk to the men, talk to the staff, to get</b></p> <p>7 <b>a feel of what it was like.</b></p> <p>8 Q. You say "It was important to me", but you're not sure</p> <p>9 that it would be a necessary part of the job</p> <p>10 description, maybe?</p> <p>11 <b>A. Yeah, I enjoyed the interaction with the men, and it was</b></p> <p>12 <b>something that I'd missed from my previous job, which</b></p> <p>13 <b>was very operational, so it was something I sort of</b></p> <p>14 <b>enjoyed doing as well.</b></p> <p>15 Q. But it's important, I would suggest also, isn't it, for</p> <p>16 the role, because, without a feel for how the centre is</p> <p>17 working, you're managing the contract in a bit of an</p> <p>18 abstract: you don't know what the effects of</p> <p>19 the provisions that you're giving force to are?</p> <p>20 <b>A. Yeah, to be honest, it's not something I've considered.</b></p> <p>21 <b>I've not given it that much thought about the reasons</b></p> <p>22 <b>why I felt the need to go out there. And somebody else</b></p> <p>23 <b>may feel -- may have a different point of view. I can</b></p> <p>24 <b>only speak from the way I was thinking.</b></p> <p>25 Q. I want to turn to a different topic, and this is use of</p> <p style="text-align: center;">Page 27</p>
<p>1 I just want to ask you about a point he makes. He</p> <p>2 considers:</p> <p>3 "If you walk around a centre, you get a feel for it.</p> <p>4 You see how people interact with each other and with the</p> <p>5 detainees, the language they use, never mind the</p> <p>6 violence, but just dismissive language and swearing and</p> <p>7 the fact they are doing it openly."</p> <p>8 He mentions other people doing it off-camera as</p> <p>9 well. While he is talking about the SMT and the</p> <p>10 impressions they can get from brief visits around the</p> <p>11 centre --</p> <p>12 <b>A. Is that G4S SMT?</b></p> <p>13 Q. He's talking about G4S, but the point generally he's</p> <p>14 making is that, by walking around a centre, you can get</p> <p>15 a feel for the culture and, for example, whether there</p> <p>16 is bad language or disrespectful language being used to</p> <p>17 detainees. Did you feel like, in your walks around</p> <p>18 Brook House, you had an adequate feel for what the</p> <p>19 centre was like?</p> <p>20 <b>A. I probably didn't walk around for the first few weeks.</b></p> <p>21 Q. Yes.</p> <p>22 <b>A. And, of course, then we had Panorama. So on my walks</b></p> <p>23 <b>around Brook, I never -- I can put my hand on my heart</b></p> <p>24 <b>and say I never saw anyone either being rude or</b></p> <p>25 <b>disrespectful to any of the men that were in our care.</b></p> <p style="text-align: center;">Page 26</p>	<p>1 force, which we have already very briefly touched on</p> <p>2 when you mentioned the dip sample.</p> <p>3 So in your first witness statement, at paragraphs 41</p> <p>4 to 44 -- it is page 9 -- you discuss use of force and</p> <p>5 you say this is something you looked at once the team's</p> <p>6 working methods were changed around. So I understand</p> <p>7 that there was a period where different people in your</p> <p>8 team were sort of designated different roles in</p> <p>9 a different way, and that was obviously after Panorama,</p> <p>10 so I think it was sometime in 2018, which we will come</p> <p>11 to.</p> <p>12 So you started to look at use of force and you say,</p> <p>13 at paragraph 42, you did dip sample use of force reports</p> <p>14 and you have already mentioned that.</p> <p>15 <b>A. Yes, from what I recall.</b></p> <p>16 Q. You say at 43, though, that you never saw any use of</p> <p>17 force in real or in footage?</p> <p>18 <b>A. No -- yeah, sorry, that's correct.</b></p> <p>19 Q. So you dip sampled the documents but you weren't --</p> <p>20 <b>A. Not personally, but my team.</b></p> <p>21 Q. Your team did?</p> <p>22 <b>A. Yes.</b></p> <p>23 Q. Do you know who in your team it was?</p> <p>24 <b>A. May have been Jenny van den Berg.</b></p> <p>25 Q. So without seeing the incident in person or footage of</p> <p style="text-align: center;">Page 28</p>

<p>1 the incident, would you agree that you don't know if --</p> <p>2 you or whoever in your team is doing the sampling, you</p> <p>3 don't know if everyone involved in the incident has</p> <p>4 completed a form because you don't know who is involved?</p> <p>5 <b>A. No.</b></p> <p>6 Q. You don't know if the description of force which is</p> <p>7 recorded on the form is accurate?</p> <p>8 <b>A. That's correct.</b></p> <p>9 Q. You don't know if the rationale that's recorded on the</p> <p>10 form for using force is, in fact, the true build-up of</p> <p>11 what happened?</p> <p>12 <b>A. Yes, you could say that, yes.</b></p> <p>13 Q. You don't know whether force was used as a last resort?</p> <p>14 <b>A. Well, if you're watching -- if you're watching a video,</b></p> <p>15 <b>you can see -- you would hopefully see the process that</b></p> <p>16 <b>has been followed or the escalation or de-escalation of</b></p> <p>17 <b>the incident and the steps that the DCO, DCOs, may have</b></p> <p>18 <b>taken to try to de-escalate the incident.</b></p> <p>19 Q. Yes. But you say at paragraph 43 that you didn't watch</p> <p>20 footage to do the dip sampling.</p> <p>21 <b>A. Me personally.</b></p> <p>22 Q. So somebody in your team who did the dip sampling did</p> <p>23 do -- did watch footage; is that right?</p> <p>24 <b>A. Yes, I'm fairly certain we did.</b></p> <p>25 Q. Do you know when that began?</p> <p style="text-align: center;">Page 29</p>	<p>1 <b>A. That would probably have been Paul, but, as far as</b></p> <p>2 <b>certification was concerned, we would go to another</b></p> <p>3 <b>department.</b></p> <p>4 Q. Which department?</p> <p>5 <b>A. I can't remember the formal name, but there was a small</b></p> <p>6 <b>team that dealt with certification, clearance and</b></p> <p>7 <b>suchlike. So I'm pretty certain we would have gone to</b></p> <p>8 <b>them to ask if it was acceptable to use staff that were,</b></p> <p>9 <b>to use the colloquialism, out of ticket.</b></p> <p>10 Q. You say it was probably Paul. May it have been you who</p> <p>11 approved the --</p> <p>12 <b>A. It is possible --</b></p> <p>13 Q. -- officers?</p> <p>14 <b>A. -- but, sorry, I don't remember.</b></p> <p>15 Q. Fine. If you had gone to the small team, would you</p> <p>16 conduct any of your own sort of checks to ensure that it</p> <p>17 was appropriate, or would you follow whatever the team</p> <p>18 told you?</p> <p>19 <b>A. I would probably have suggested, "Can we do -- is there</b></p> <p>20 <b>any reason why we can't do this?". So there may have</b></p> <p>21 <b>been some legislation that either would empower us to</b></p> <p>22 <b>take that decision or, indeed, not allow us to use staff</b></p> <p>23 <b>that were out of ticket.</b></p> <p>24 Q. It's quite obvious why you use staff that have</p> <p>25 up-to-date training, isn't it: safety reasons?</p> <p style="text-align: center;">Page 31</p>
<p>1 <b>A. I think we -- it would probably have been early 2018.</b></p> <p>2 <b>It might have been before that. I don't know whether it</b></p> <p>3 <b>was occurring prior to my arrival, but I'm pretty</b></p> <p>4 <b>certain we started -- it was in place end of 2017/early</b></p> <p>5 <b>2018.</b></p> <p>6 Q. Do you know how -- what percentage of use of force</p> <p>7 incidents would be subject to the dip sample?</p> <p>8 <b>A. I can't remember, sorry.</b></p> <p>9 Q. But, nevertheless, you didn't personally do it and you</p> <p>10 don't know how many were reviewed. Did you consider</p> <p>11 this an adequate measure to ensure that use of force was</p> <p>12 being used appropriately or did you not consider that</p> <p>13 part of your contractual role?</p> <p>14 <b>A. I didn't really consider it, full stop.</b></p> <p>15 Q. Finally on use of force, the Verita report -- the actual</p> <p>16 report, not your interview to them -- recorded at</p> <p>17 paragraph 12.67:</p> <p>18 "The interim director told us that, in late 2017, he</p> <p>19 had received approval from onsite Home Office managers</p> <p>20 for 20 officers without an up-to-date training in C&amp;R to</p> <p>21 continue to work at Brook House for periods of up to</p> <p>22 a month. That approval was subsequently withdrawn."</p> <p>23 Do you know who the onsite Home Office managers</p> <p>24 referred to there are who would have been approving</p> <p>25 officers?</p> <p style="text-align: center;">Page 30</p>	<p>1 <b>A. Yes, of course. The reference would be for staff to --</b></p> <p>2 <b>but the other consideration, and this is something that</b></p> <p>3 <b>has just occurred to me, but, for someone to be in</b></p> <p>4 <b>ticket one day and then out of ticket the next, does not</b></p> <p>5 <b>necessarily mean that they are completely incapable of</b></p> <p>6 <b>carrying out those duties.</b></p> <p>7 Q. So you consider there might be an area of leeway,</p> <p>8 perhaps?</p> <p>9 <b>A. I don't like the word "leeway".</b></p> <p>10 Q. Sure. Subject to approval?</p> <p>11 <b>A. Yes, and, you know, sometimes it's about the risk, and,</b></p> <p>12 <b>again, this was agreed by the certification team.</b></p> <p>13 Q. As we see in the Verita report, the approval was</p> <p>14 subsequently withdrawn. Do you remember being told why</p> <p>15 it was withdrawn?</p> <p>16 <b>A. No, I don't remember the sort of ins and outs of that</b></p> <p>17 <b>process.</b></p> <p>18 Q. Moving on now, then, to rule 40, you say in your second</p> <p>19 statement at paragraph 25 about rule 40 and 42, and you</p> <p>20 said that you let yourself know about DSOs when you</p> <p>21 started and, obviously, once you started working at</p> <p>22 Brook House, you would have heard about rule 40 and</p> <p>23 learnt more about it, I assume?</p> <p>24 <b>A. It was one of the first things that I was sort of made</b></p> <p>25 <b>aware of, as far as my authority as an SEO was required.</b></p> <p style="text-align: center;">Page 32</p>



<p>1 Q. You say you didn't review rule 40 to 42 paperwork for</p> <p>2 quality purposes but that a member of staff dip sampled</p> <p>3 the paperwork. Then you say:</p> <p>4 "I did have sight of the paperwork if I was required</p> <p>5 to authorise an extension."</p> <p>6 So that's the authority --</p> <p>7 <b>A. Yes.</b></p> <p>8 Q. And you don't recall any specific times you directly</p> <p>9 engaged with detainees during the rule 40 to 42, and you</p> <p>10 definitely did not do so during the relevant period?</p> <p>11 <b>A. I may have clarified that in my second statement. I do</b></p> <p>12 <b>recall a couple of times in the four years I was there</b></p> <p>13 <b>that I did interact with the men in their rooms during</b></p> <p>14 <b>the review.</b></p> <p>15 Q. You say not during the relevant period. Obviously that</p> <p>16 was only, for you, four weeks that you were working</p> <p>17 there?</p> <p>18 <b>A. Yeah, absolutely.</b></p> <p>19 Q. Do you recall roughly how often you would be asked to</p> <p>20 authorise an extension to a rule 40?</p> <p>21 <b>A. It really could vary. There may have been occasions</b></p> <p>22 <b>where we would have had four or five rule 40/42s going</b></p> <p>23 <b>on at the same time, and there were plenty of times</b></p> <p>24 <b>where there was nobody within -- held under rule 40.</b></p> <p>25 Q. So if there's four or five on at the same time, you have</p> <p style="text-align: center;">Page 33</p>	<p>1 <b>staff would have been present.</b></p> <p>2 Q. So who created that formal document?</p> <p>3 <b>A. That was sent to me?</b></p> <p>4 Q. Yes.</p> <p>5 <b>A. G4S would write the document.</b></p> <p>6 Q. You said it would include rule 40 logs, where you say</p> <p>7 your member of staff was present?</p> <p>8 <b>A. So the review would take place with G4S, I think</b></p> <p>9 <b>a member of healthcare, chaplaincy and Home Office</b></p> <p>10 <b>staff.</b></p> <p>11 Q. So daily visits, as we know, to anyone on rule 40 or 42</p> <p>12 are required by a grade EO or higher --</p> <p>13 <b>A. That's right.</b></p> <p>14 Q. -- per the DSO. Would that be a member of your team who</p> <p>15 would be going to the daily rule 40s?</p> <p>16 <b>A. Yes.</b></p> <p>17 Q. Was it your job to ensure that a member of your team</p> <p>18 went to see anyone on rule 40 or 42 every day?</p> <p>19 <b>A. I suppose so, but it's an expectation. You know, if we</b></p> <p>20 <b>had someone on rule 40, a member of staff would be going</b></p> <p>21 <b>down.</b></p> <p>22 Q. When you took the decision to extend, you'd look at</p> <p>23 your -- the formal document which was a composite of</p> <p>24 rule 40 logs?</p> <p>25 <b>A. Yes.</b></p> <p style="text-align: center;">Page 35</p>
<p>1 to authorise every day; is that right?</p> <p>2 <b>A. I would authorise for a period.</b></p> <p>3 Q. Right.</p> <p>4 <b>A. Up to two weeks, which I never did. I can't say</b></p> <p>5 <b>"never". I don't recall authorising a full two-week</b></p> <p>6 <b>detention under rule 40. Subsequent to the two-week</b></p> <p>7 <b>period, the process is refreshed and would go up to my</b></p> <p>8 <b>grade 7, Michelle, to authorise further detention under</b></p> <p>9 <b>rule 40. The expectation from me and the team, my team,</b></p> <p>10 <b>was that G4S would continue to de-escalate the detainee.</b></p> <p>11 <b>So if I'd authorised, for example, a further three</b></p> <p>12 <b>days, they were welcome to actually release the man</b></p> <p>13 <b>earlier. It was a limit.</b></p> <p>14 Q. So you'd authorise for what you thought the maximum</p> <p>15 appropriate amount of time is, with the inbuilt</p> <p>16 safeguard that G4S might release sooner?</p> <p>17 <b>A. Yes.</b></p> <p>18 Q. How did you know whether extensions should be authorised</p> <p>19 if you weren't, as you say, very regularly in contact</p> <p>20 with the detained person? So what would you look at?</p> <p>21 <b>A. I would get a report -- a formal document, part of</b></p> <p>22 <b>the DSO, which would outline the reasons for the</b></p> <p>23 <b>original detention under rule 40 and steps that had been</b></p> <p>24 <b>taken, incidents that may have occurred; an overview of</b></p> <p>25 <b>what had happened during the review, and a member of my</b></p> <p style="text-align: center;">Page 34</p>	<p>1 Q. Do you remember what other information, if any, would be</p> <p>2 in there?</p> <p>3 <b>A. So there would be the initial reason, and then,</b></p> <p>4 <b>depending on the day -- how many days the detainee had</b></p> <p>5 <b>been held under rule 40, there would be a summary of</b></p> <p>6 <b>each day. So it would be -- it's a roll -- it would be</b></p> <p>7 <b>a rolling document. So they would add -- if I'd</b></p> <p>8 <b>authorised a further 24 hours, I'd get the same document</b></p> <p>9 <b>with then a further summary of how the previous 24 hours</b></p> <p>10 <b>and that review had occurred.</b></p> <p>11 Q. Would you speak to the member of staff who visited them</p> <p>12 or normally rely on the written record?</p> <p>13 <b>A. What would normally happen would be, the member of staff</b></p> <p>14 <b>would come up and say, "I think we're going to either</b></p> <p>15 <b>extend", and give me reasons, or, "I think he's --</b></p> <p>16 <b>they're going to let him back on the wing". So I didn't</b></p> <p>17 <b>have to authorise him being released, I just had to</b></p> <p>18 <b>authorise the extension if it was required.</b></p> <p>19 Q. Were there times, if you can remember, when there was</p> <p>20 a suggestion that he be maintained on rule 40, but you</p> <p>21 thought, "Actually, no, I shouldn't grant this</p> <p>22 authorisation"?</p> <p>23 <b>A. I'm sure there were occasions when I'd asked for more</b></p> <p>24 <b>detail, and I'm sure there were occasions when I asked</b></p> <p>25 <b>them to look at any additional methods or ways of</b></p> <p style="text-align: center;">Page 36</p>

<p>1 <b>de-escalating and getting the fella off rule 40 and back</b></p> <p>2 <b>into normal association.</b></p> <p>3 <b>So, as I think everyone is aware, the CSU is at the</b></p> <p>4 <b>end of E wing, so a possibility of de-escalation would</b></p> <p>5 <b>be to move him to E wing, for example.</b></p> <p>6 Q. Approximately how often, or what percentage of times</p> <p>7 when you were asked for authorisation, did you ask for</p> <p>8 more information before you granted it? Was it unusual,</p> <p>9 regular?</p> <p>10 <b>A. Not regular, no. Irregularly.</b></p> <p>11 Q. What percentage of times, if at all, did you even,</p> <p>12 despite any more information, say, "No, I'm not going to</p> <p>13 grant this authorisation"?</p> <p>14 <b>A. This may be a false memory, but I think I did once or</b></p> <p>15 <b>twice.</b></p> <p>16 Q. Rather than looking at your decision now, how often, if</p> <p>17 at all, did members of your team say, "I don't think</p> <p>18 that we should grant the authorisation"?</p> <p>19 <b>A. Again, irregularly.</b></p> <p>20 Q. So on a day-to-day basis, you'd normally grant the</p> <p>21 authorisations, although sometimes you might ask for</p> <p>22 more information?</p> <p>23 <b>A. Generally.</b></p> <p>24 Q. The IMB, in 2016 and 2017 -- and we have already</p> <p>25 mentioned the IMB's reports for those years -- expressed</p> <p style="text-align: center;">Page 37</p>	<p>1 <b>A. Yes.</b></p> <p>2 Q. Did you ever consider that being on CSU was itself</p> <p>3 a further exacerbation?</p> <p>4 <b>A. The issue around rule 40 is not just -- it is not</b></p> <p>5 <b>a punishment.</b></p> <p>6 Q. Yes.</p> <p>7 <b>A. It's to keep that person safe and secure. It's to stop</b></p> <p>8 <b>them self-harming. It's to -- and it's also for the</b></p> <p>9 <b>safety and security of the other residents. And also of</b></p> <p>10 <b>the staff.</b></p> <p>11 <b>So, in the round, you would have to consider the</b></p> <p>12 <b>safety of the other men and the staff and the detainee</b></p> <p>13 <b>himself.</b></p> <p>14 Q. As you say, it is not a punishment, and it might keep</p> <p>15 them safe and secure, but for some people -- I know</p> <p>16 you're not a clinician -- but being held in isolation</p> <p>17 under rule 40 doesn't help their condition?</p> <p>18 <b>A. As you said, I'm not a clinician. I'm sure that some</b></p> <p>19 <b>people with mental health issues would welcome the peace</b></p> <p>20 <b>and quiet. Brook is a loud place, so they would</b></p> <p>21 <b>possibly welcome, but, again, I'm no clinician.</b></p> <p>22 Q. When you said you didn't notice a pattern of detainees</p> <p>23 with mental health issues being held on rule 40, we</p> <p>24 shouldn't be confused by the word "pattern". You did</p> <p>25 notice it happening, you just didn't notice any specific</p> <p style="text-align: center;">Page 39</p>
<p>1 concerns about mentally unwell detainees being held on</p> <p>2 rule 40 in the CSU. You mentioned the Care and</p> <p>3 Separation Unit. We have now heard during the course of</p> <p>4 the inquiry, including from Sandra Calver, the head of</p> <p>5 healthcare -- I don't know if you saw her evidence --</p> <p>6 that rules 40 and 42 were sometimes used on detainees</p> <p>7 with mental illnesses, or who were self-harming or who</p> <p>8 had suicide risks.</p> <p>9 You say in your second statement at paragraph 25</p> <p>10 that you didn't notice a pattern of detainees with</p> <p>11 mental health issues being held on rule 40?</p> <p>12 <b>A. No, not a pattern.</b></p> <p>13 Q. You did notice it happening?</p> <p>14 <b>A. I'm sure that there would have been probably a number of</b></p> <p>15 <b>occasions where the men would have been suffering from</b></p> <p>16 <b>mental health issues. I think, if you spend more than</b></p> <p>17 <b>24 hours in Brook House, you're going to develop mental</b></p> <p>18 <b>health issues. It's not a nice place to be.</b></p> <p>19 Q. And there's people who, you suggest, exacerbated by</p> <p>20 being in Brook House?</p> <p>21 <b>A. Possibly.</b></p> <p>22 Q. And there's people, also, who have them, in any event,</p> <p>23 aren't there?</p> <p>24 <b>A. Yes.</b></p> <p>25 Q. Some of those were on rule 40?</p> <p style="text-align: center;">Page 38</p>	<p>1 pattern to it?</p> <p>2 <b>A. Yes.</b></p> <p>3 Q. I see. By the time that you left, which was in 2021,</p> <p>4 were you aware that more IMB reports, so from 2017 and</p> <p>5 2018, had raised concerns regarding mentally unwell</p> <p>6 detainees being held on rule 40?</p> <p>7 <b>A. So I would have probably been aware -- I can't remember</b></p> <p>8 <b>specifics, but I would have been aware of the issues</b></p> <p>9 <b>that the IMB had raised, because we would send them</b></p> <p>10 <b>a response. But without seeing a specific report that</b></p> <p>11 <b>came under my time at Brook and seeing our response,</b></p> <p>12 <b>I can't really say.</b></p> <p>13 Q. So the IMB report regarding 2020 that I mentioned</p> <p>14 earlier, although it was published after you left the</p> <p>15 role, so you wouldn't have seen it -- it was published,</p> <p>16 I think, a month after you left, but it flagged concerns</p> <p>17 also around the pre-emptive use of rule 40. Was that</p> <p>18 something that you ever had concerns about?</p> <p>19 <b>A. No. I'm sure it must have happened, but I don't recall</b></p> <p>20 <b>any specifics around being -- personally being asked to</b></p> <p>21 <b>authorise a pre-emptive rule 40.</b></p> <p>22 Q. As I mentioned about the IMB concerns about mentally</p> <p>23 unwell detainees on rule 40, obviously you were</p> <p>24 responsible sometimes for authorising rule 40</p> <p>25 extensions. Did consideration of the mental impact of</p> <p style="text-align: center;">Page 40</p>

<p>1 being on rule 40 play into your decision of whether or</p> <p>2 not to authorise?</p> <p>3 <b>A. I am sure that I would have requested, if it hadn't been</b></p> <p>4 <b>mentioned by G4S, that the man would be referred to</b></p> <p>5 <b>mental health, talk to the mental health nurse. So,</b></p> <p>6 <b>yes, it was a consideration.</b></p> <p>7 Q. You discuss, at paragraphs 18 to 19 of your first</p> <p>8 witness statement, the Adults at Risk policy?</p> <p>9 <b>A. Yes.</b></p> <p>10 Q. Did you receive training on that policy?</p> <p>11 <b>A. No.</b></p> <p>12 Q. The rule 40 to 40 DSO [as spoken], which you have</p> <p>13 considered, specifies that you should consider the</p> <p>14 rule 40 to 40 DSO [as spoken] alongside the management</p> <p>15 of Adults at Risk when making immigration decisions and</p> <p>16 decisions like rule 40 and immigration detention?</p> <p>17 <b>A. Mmm-hmm.</b></p> <p>18 Q. Would you consider that the question of whether someone</p> <p>19 is an Adult at Risk, according to the wording of</p> <p>20 the policy, was relevant to your decisions about whether</p> <p>21 or not to extend rule 40?</p> <p>22 <b>A. The issues around the health, both mental and physical,</b></p> <p>23 <b>of the detainee was considered along with the security</b></p> <p>24 <b>of the centre and the other detainees and the staff. So</b></p> <p>25 <b>it was -- yes, it was considered.</b></p> <p style="text-align: center;">Page 41</p>	<p>1 detainee engagement team. In parallel, following</p> <p>2 National Audit Office recommendations ... the</p> <p>3 Home Office ... decided to improve its monitoring of</p> <p>4 the contract. In April 2018, it split its onsite team</p> <p>5 into a detainee engagement team supporting detainees'</p> <p>6 immigration casework and a contract compliance team</p> <p>7 [that's your team]. The compliance team now comprises</p> <p>8 four executive officers, one higher executive officer</p> <p>9 and one senior executive officer led by a Grade 7</p> <p>10 official ([ie] a Civil Service senior middle manager)."</p> <p>11 Is that the same event you refer to where different</p> <p>12 staff were given different aspects of the contract to</p> <p>13 comply?</p> <p>14 <b>A. Yes.</b></p> <p>15 Q. Are you the grade 7 official mentioned?</p> <p>16 <b>A. No.</b></p> <p>17 Q. No, you're the senior executive officer, of course --</p> <p>18 <b>A. No, Michelle Smith would be the -- yeah.</b></p> <p>19 Q. -- and Michelle Smith is the grade 7. At that point,</p> <p>20 the point where the nature of the monitoring changed</p> <p>21 a bit, did you receive, then, any training on</p> <p>22 contractual performance monitoring?</p> <p>23 <b>A. No.</b></p> <p>24 Q. You say in your statement that you felt this improved</p> <p>25 your team's effectiveness and you discussed this sort of</p> <p style="text-align: center;">Page 43</p>
<p>1 Q. You didn't have any training, I think you indicated, on</p> <p>2 Adults at Risk?</p> <p>3 <b>A. I can't say that I was aware that the Adults at Risk</b></p> <p>4 <b>policy would sit alongside -- that the two them would</b></p> <p>5 <b>sit alongside each other.</b></p> <p>6 Q. I want to move on now to the division of responsibility</p> <p>7 in your team, just briefly. So you state in your second</p> <p>8 witness statement, paragraph 26, that in late 2017 or</p> <p>9 2018, contract compliance changed and thereafter</p> <p>10 different staff were given different aspects of</p> <p>11 the contract to look at; is that right?</p> <p>12 <b>A. Yes.</b></p> <p>13 Q. The NAO report, which we briefly looked at, says that</p> <p>14 before 2018, the Home Office onsite team at Brook House</p> <p>15 focused almost exclusively on supporting Home Office</p> <p>16 immigration casework teams in their interactions and it</p> <p>17 says that one executive officer spent part of their time</p> <p>18 overseeing the contract. It says that it was not able</p> <p>19 to sufficiently examine other areas of self-reported</p> <p>20 performance or challenge G4S on its management of</p> <p>21 the centre.</p> <p>22 Then at 3.4, it says:</p> <p>23 "Following the Stephen Shaw review ... the</p> <p>24 Home Office decided to improve its management of its</p> <p>25 onsite operations, including strengthening ... its</p> <p style="text-align: center;">Page 42</p>	<p>1 thematic approach to the contract with Verita. You were</p> <p>2 asked how does it divide up, and you said:</p> <p>3 "We can't cover X amount of staff and there are Y</p> <p>4 numbers of pointers within the contract. But we have</p> <p>5 covered what we feel are most essential. For example,</p> <p>6 Jenny with security will have a look around the centre,</p> <p>7 have a chat with some of the staff. She is reviewing,</p> <p>8 for example, the rule 40/42 paperwork and how it is</p> <p>9 dealt with."</p> <p>10 And then you say food testing and cleaning will be</p> <p>11 dealt with on a daily basis?</p> <p>12 <b>A. Yes.</b></p> <p>13 Q. So you couldn't cover every point but you covered what</p> <p>14 you feel is most essential?</p> <p>15 <b>A. So the reception, welfare -- and I think activities went</b></p> <p>16 <b>under welfare -- catering and cleaning and security, so</b></p> <p>17 <b>to ensure that we are looking at reports, use of force</b></p> <p>18 <b>reports, and suchlike.</b></p> <p>19 Q. Was that your assessment of what was most essential, or</p> <p>20 did it come from somebody else or some other department?</p> <p>21 <b>A. It was driven by Michelle.</b></p> <p>22 Q. Yes. So areas to concentrate on within --</p> <p>23 <b>A. Yeah. I think she had the initial idea and we had</b></p> <p>24 <b>a couple of meetings as a team to discuss more specifics</b></p> <p>25 <b>and who would deal -- who would deal with each</b></p> <p style="text-align: center;">Page 44</p>

<p>1 <b>particular area.</b></p> <p>2 Q. You say that you felt that that made your monitoring</p> <p>3 more effective?</p> <p>4 <b>A. I think so, yeah.</b></p> <p>5 Q. Turning now to your experience of the aftermath of</p> <p>6 Panorama. So obviously you were pretty newly arrived</p> <p>7 when it was broadcast, so almost everything that you saw</p> <p>8 at the centre was the aftermath of Panorama?</p> <p>9 <b>A. Mmm.</b></p> <p>10 Q. In your first statement, you say at paragraph 47 that</p> <p>11 during your time at Brook House, you had no reason to</p> <p>12 think that the behaviour the programme showed was</p> <p>13 continuing. At paragraph 50, you say that, following</p> <p>14 the programme, an action plan was put into place with</p> <p>15 numerous improvements and changes?</p> <p>16 <b>A. Yes.</b></p> <p>17 Q. Could we have a look again at Verita &lt;VER000268&gt;. It</p> <p>18 will come up on the screen again. If we can look at</p> <p>19 page 5. So, again, this is the transcript of your</p> <p>20 interview with Verita, which occurred on 23 April 2018.</p> <p>21 So it is about seven and a half months after the</p> <p>22 broadcast. Page 5. The top half of the page, please.</p> <p>23 You had been asked there quite a long question about</p> <p>24 things that have changed in relation to the fallout from</p> <p>25 Panorama. You say at 46:</p> <p style="text-align: center;">Page 45</p>	<p>1 "Do you feel that some of the stuff that's happened</p> <p>2 since Panorama is all well and good but it is not really</p> <p>3 getting to the nub of the issue?"</p> <p>4 And you say:</p> <p>5 "To a certain degree, yes. Superficial improvements</p> <p>6 in the look of the place are one thing, like I said,</p> <p>7 having a fresh lick of paint in the main corridors,</p> <p>8 okay -- that's all right."</p> <p>9 Pausing there, you thought that Lee Hanford did care</p> <p>10 about the safety of detainees but you didn't know if he</p> <p>11 had access to the purse strings to do anything more</p> <p>12 concrete?</p> <p>13 <b>A. Yes. I remember having a conversation with Lee about</b></p> <p>14 <b>putting in a whole new gym facility over one of the --</b></p> <p>15 <b>in one of the yards, and enclosing one of the yards.</b></p> <p>16 <b>But it was going to cost an awful lot of money.</b></p> <p>17 Q. Is that -- having something built into the contractual</p> <p>18 arrangement to allow money for things that should, or</p> <p>19 could, be done, is that something that you had a role in</p> <p>20 understanding/promoting?</p> <p>21 <b>A. To a certain degree, depending on the costs. So</b></p> <p>22 <b>bringing in some new computer games, for example, would</b></p> <p>23 <b>be something that I would be able to authorise. But big</b></p> <p>24 <b>spends would have to go to a senior manager and probably</b></p> <p>25 <b>across the commercial team as well.</b></p> <p style="text-align: center;">Page 47</p>
<p>1 "There is quite a lot of talk."</p> <p>2 You are talking there about senior managers having</p> <p>3 previous experience in prisons and you say at 52:</p> <p>4 "Just for clarity, it is not just Steve. Lee comes</p> <p>5 from a prison background where he has worked in</p> <p>6 detention centres -- previously he worked here a few</p> <p>7 years ago, so there seems to have been a lot of</p> <p>8 references to how they deal with in prisons, and I have</p> <p>9 said, 'This isn't a prison; this is a detention centre</p> <p>10 and things are different'; they don't seem to be able to</p> <p>11 take that on board."</p> <p>12 Pausing there, Steve and Lee, is that Steve Skitt,</p> <p>13 deputy director at the time?</p> <p>14 <b>A. Yes.</b></p> <p>15 Q. And Lee Hanford, director after Ben Saunders left?</p> <p>16 <b>A. Yes.</b></p> <p>17 Q. Going on, you say:</p> <p>18 "I must say, I was quite impressed with Lee when he</p> <p>19 came in, but a lot of the work they have done has been</p> <p>20 very superficial -- a lick of paint here, a few new</p> <p>21 tiles there, but I think he does care about certainly</p> <p>22 the safety of the detainees. Whether he has access to</p> <p>23 the purse strings to do anything about it, I don't</p> <p>24 know."</p> <p>25 Then Mr Marsden asks you:</p> <p style="text-align: center;">Page 46</p>	<p>1 Q. So if you thought there was a big spend, as you call it,</p> <p>2 that would require, you know, more fundamental change to</p> <p>3 the contract, you couldn't authorise it yourself, but</p> <p>4 you could raise it with somebody else?</p> <p>5 <b>A. Yes. I think it's worth bearing in mind as well that,</b></p> <p>6 <b>at this time, there was still the issue of the contract,</b></p> <p>7 <b>the changeover of the contract --</b></p> <p>8 Q. Yes.</p> <p>9 <b>A. -- which I possibly didn't give -- think about when</b></p> <p>10 <b>I was interviewed.</b></p> <p>11 Q. How do you mean?</p> <p>12 <b>A. So I didn't consider the fact that there's going to be</b></p> <p>13 <b>a new contract in place, so hopefully this -- you know,</b></p> <p>14 <b>I don't -- I don't have any control over what will</b></p> <p>15 <b>become of the new contract. I was asked a question and</b></p> <p>16 <b>I gave an opinion.</b></p> <p>17 Q. Okay. So you don't have any control over what's in the</p> <p>18 new contract. Did you feel that, given your knowledge</p> <p>19 that you'd accrued over the last seven and a half months</p> <p>20 of working there, eight months, you had useful feedback</p> <p>21 to give into what should be in the new contract?</p> <p>22 <b>A. Possibly. But, actually, seven and a half months isn't</b></p> <p>23 <b>an enormously long time, especially in an environment</b></p> <p>24 <b>like Brook House and in the job I had. So it was almost</b></p> <p>25 <b>like a never-ending learning process.</b></p> <p style="text-align: center;">Page 48</p>

<p>1 Q. But you had noticed things, hadn't you, by this time,</p> <p>2 about staffing being an issue?</p> <p>3 <b>A. Yes.</b></p> <p>4 Q. And some activities points you just made. Did you feed</p> <p>5 these back to anyone who might have had responsibility</p> <p>6 for drawing up the new contract?</p> <p>7 <b>A. Not the extension, because we were going through an</b></p> <p>8 <b>extension process.</b></p> <p>9 Q. Yes.</p> <p>10 <b>A. But for the new contract, which came into place in</b></p> <p>11 <b>2020 --</b></p> <p>12 Q. With Serco?</p> <p>13 <b>A. -- I was part of the team that had a look at what we</b></p> <p>14 <b>needed on the Gatwick IRCs.</b></p> <p>15 Q. So was your understanding that the extension process was</p> <p>16 simply extending the same contract without a provision</p> <p>17 to change any of the requirements?</p> <p>18 <b>A. I think so, yeah.</b></p> <p>19 Q. Then, at the bottom of that page, you're asked about</p> <p>20 governance and what's being done to ensure people are</p> <p>21 looked after. We can see that in the last question.</p> <p>22 Just to turn over the page to page 6, at the top it's</p> <p>23 suggested to you that there is a lot of meetings. The</p> <p>24 questioner, we can see, mentions:</p> <p>25 "We have been to an adults' risk meeting, we have</p> <p style="text-align: center;">Page 49</p>	<p>1 Then they acknowledge you are relatively new in the</p> <p>2 relationship but your answer is at line 15. You say:</p> <p>3 "No. I see and I hear words and I see attempts, but</p> <p>4 they are hugely hindered by the recruitment process and</p> <p>5 by the pool of people that they have available, and</p> <p>6 I think that it is not the beginning and end of</p> <p>7 everything, but it is a huge contributing factor to</p> <p>8 everything they do and don't do here. I probably</p> <p>9 couldn't give them more than six."</p> <p>10 So you have given them a six out of ten and you have</p> <p>11 mentioned at these meetings there are a lot of things</p> <p>12 being said but not much action?</p> <p>13 <b>A. I think I also said there they were hindered by the</b></p> <p>14 <b>recruitment process.</b></p> <p>15 Q. So that's a staffing --</p> <p>16 <b>A. Yeah, and it didn't help them being right next to</b></p> <p>17 <b>Gatwick Airport where the salaries, I was led to</b></p> <p>18 <b>believe, were better.</b></p> <p>19 Q. I see. So they're competing with someone who can pay</p> <p>20 more?</p> <p>21 <b>A. Yeah, their catchment area, I think they had staff who</b></p> <p>22 <b>were coming up from the coast and -- not beyond the</b></p> <p>23 <b>coast, but further away sort of north of London.</b></p> <p>24 Q. Yes.</p> <p>25 <b>A. People with long journeys.</b></p> <p style="text-align: center;">Page 51</p>
<p>1 been to a security meeting, we have been to the</p> <p>2 detainees of interest meeting."</p> <p>3 And they suggest that there is an awful lot of</p> <p>4 meetings and talking, and the person who is asking you</p> <p>5 questions isn't sure that it achieves everything. And</p> <p>6 they say:</p> <p>7 "Does that ring true for you in those meetings?"</p> <p>8 And you say:</p> <p>9 "It does. There is a lot of waffle and a lot of hot</p> <p>10 air."</p> <p>11 The questioner says:</p> <p>12 "A lot of gossip?</p> <p>13 "Yes, but not much in the way of action, I have to</p> <p>14 agree with you, Kate."</p> <p>15 That's the name of the person asking you questions.</p> <p>16 Going back to page 3, and this is in response to</p> <p>17 a question at the bottom of page 2 about contract</p> <p>18 monitoring and whether the target monitoring lacked</p> <p>19 a bigger-picture approach to quality of life. At the</p> <p>20 top of page 3 there, you're asked:</p> <p>21 "In overall terms, how are they doing at the</p> <p>22 moment?"</p> <p>23 This is G4S:</p> <p>24 "If 10 was a brilliant job and one was not very good</p> <p>25 at all, where would you put them?"</p> <p style="text-align: center;">Page 50</p>	<p>1 Q. So one of the issues might be that there are more</p> <p>2 attractive salaries locally, similarly jobs?</p> <p>3 <b>A. Yes.</b></p> <p>4 Q. Maybe easier jobs?</p> <p>5 <b>A. I think so.</b></p> <p>6 Q. Did you find the salaries of DCO was a contractual issue</p> <p>7 you might have had some feedback into?</p> <p>8 <b>A. I don't remember discussions around the salaries.</b></p> <p>9 Q. Do you think that if we looked at your team's</p> <p>10 performance monitoring document, so the monthly reports</p> <p>11 that we see, and the points that your team would have</p> <p>12 raised in various contract review meetings, we would</p> <p>13 have known that, stepping back and looking at the big</p> <p>14 picture at this time, you would only rate G4S a six out</p> <p>15 of ten? Do you think that would have come through?</p> <p>16 <b>A. I don't know, because I'm basing my six on stuff that</b></p> <p>17 <b>isn't measured. So, for example, the hot air and lack</b></p> <p>18 <b>of action is not something that's measured. It's not</b></p> <p>19 <b>something that's part of the contract.</b></p> <p>20 Q. Mmm.</p> <p>21 <b>A. So I can't say. Probably not.</b></p> <p>22 Q. Your criticism of some of the meetings where things are</p> <p>23 discussed but not much was really done to make effective</p> <p>24 change, would you accept that that was true of some of</p> <p>25 the contractual compliance meetings involving your team</p> <p style="text-align: center;">Page 52</p>

<p>1 as well?</p> <p>2 <b>A. I don't think so. I don't think you could give me an</b></p> <p>3 <b>example, could you?</b></p> <p>4 Q. So, for example, in your team's meetings where you're</p> <p>5 monitoring the contract, you discuss the performance</p> <p>6 points but not much, you know, maybe is delved into in</p> <p>7 a lot of detail and not much change arises. Would that</p> <p>8 be true for some of your meetings?</p> <p>9 <b>A. Possibly, in some respects, I suppose. But I can't give</b></p> <p>10 <b>a definitive, I'm sorry.</b></p> <p>11 Q. So we talked, for example, about the monitoring of</p> <p>12 self-harm and the fact that you don't seem to have been</p> <p>13 aware at the actual levels of self-harm versus what</p> <p>14 ended up being recorded in your reports?</p> <p>15 <b>A. Yes.</b></p> <p>16 Q. Would you accept that that was an example?</p> <p>17 <b>A. That would probably be an issue, yes.</b></p> <p>18 Q. Finally, then, turning to the situation at the time that</p> <p>19 you left, I have already mentioned the IMB report that</p> <p>20 you have at tab 18. It wasn't published, as I said,</p> <p>21 until after you left, so there is no expectation you</p> <p>22 will have seen or applied it, but its contents are about</p> <p>23 2020, so the last year you were there. By 2020, there</p> <p>24 was a new contract, so a contract with Serco.</p> <p>25 Obviously, there was a significant impact of</p> <p style="text-align: center;">Page 53</p>	<p>1 the latter months of 2020 Brook House was not a safe</p> <p>2 place for vulnerable detainees who had crossed the</p> <p>3 Channel in small boats."</p> <p>4 It says that this is evidenced by the high levels of</p> <p>5 self-harm and suicidal ideation at this time, and we</p> <p>6 have seen elsewhere in this document that the high</p> <p>7 levels of self-harm drove up the use of force.</p> <p>8 Finally, overleaf, at the top of page 6, under the</p> <p>9 heading "How fairly and humanely are detainees</p> <p>10 treated?":</p> <p>11 "From our monitoring and observations, the board's</p> <p>12 view is that detainees are generally treated humanely at</p> <p>13 Brook House. However:</p> <p>14 "The board's view is that circumstances in</p> <p>15 Brook House related to the Dublin Convention charter</p> <p>16 programme amounted to inhumane treatment of the whole</p> <p>17 detainee population by the Home Office in the latter</p> <p>18 months of 2020."</p> <p>19 This is obviously very concerning to read?</p> <p>20 <b>A. Mmm.</b></p> <p>21 Q. It shows, doesn't it, that, despite changes made in</p> <p>22 light of Panorama to improve detainee welfare at</p> <p>23 Brook House, some of which you have alluded to, systems</p> <p>24 at Brook House were not sufficiently robust to safeguard</p> <p>25 vulnerable detainees at this time?</p> <p style="text-align: center;">Page 55</p>
<p>1 the pandemic, and as a result of the changes in charter</p> <p>2 flights, accordingly, under the Dublin Convention</p> <p>3 charter programme, the majority of the population at</p> <p>4 Brook House had crossed the Channel via --</p> <p>5 <b>A. We had a lot of small boat people.</b></p> <p>6 Q. Can we have a look at &lt;IMB000202&gt; please, page 5. This</p> <p>7 is from that report. The fourth bullet point there.</p> <p>8 The fourth bullet point says:</p> <p>9 "The combination of the compressed nature of</p> <p>10 the charter flight programme, with Brook House as its</p> <p>11 sole base for Dublin Convention flights, and the</p> <p>12 fundamental changes in the centre's population and</p> <p>13 nationalities, their different vulnerabilities and their</p> <p>14 needs, put the centre's systems, detainees and staff</p> <p>15 under great stress and raised some serious concerns for</p> <p>16 the board."</p> <p>17 That's the Independent Monitoring Board:</p> <p>18 "Most notably, there was a dramatic increase in</p> <p>19 levels of self-harm and suicidal ideation, deficiencies</p> <p>20 in the induction process and an increased need for legal</p> <p>21 support and detention centre rule 35 assessments."</p> <p>22 At the bottom of the page, under the heading "How</p> <p>23 safe is the IRC?":</p> <p>24 "The board's view is that, due to circumstances</p> <p>25 related to the Dublin Convention charter programme, in</p> <p style="text-align: center;">Page 54</p>	<p>1 <b>A. Possibly, and the processes, because of Covid. That was</b></p> <p>2 <b>a hugely impacting factor as well. And I can't disagree</b></p> <p>3 <b>with the words that the IMB have said.</b></p> <p>4 Q. In your view -- you have mentioned the impact of Covid,</p> <p>5 of course, but in your view, where else does the</p> <p>6 responsibility for this lie?</p> <p>7 <b>A. That's a political question, I think, and I'm not sure</b></p> <p>8 <b>that I'm in a position to answer it as a Home Office</b></p> <p>9 <b>employee.</b></p> <p>10 Q. Well, you have knowledge of the operation of</p> <p>11 the contract at Brook House, for example?</p> <p>12 <b>A. Yes.</b></p> <p>13 Q. In your view, is there any operational issues that you</p> <p>14 saw during your time there that would have contributed</p> <p>15 to this?</p> <p>16 <b>A. From the period after lockdown until pretty much I left</b></p> <p>17 <b>was a hugely stressful time for the staff, for the DCOs</b></p> <p>18 <b>and for the detainees. There were a lot of staff going</b></p> <p>19 <b>off -- not so much on my team, but there was -- the</b></p> <p>20 <b>effects of stress were affecting senior managers --</b></p> <p>21 <b>a grade 6 went off, and the director-general actually</b></p> <p>22 <b>went off with sick -- with stress. So we were there to</b></p> <p>23 <b>do a job to the best of our ability, as were the Serco</b></p> <p>24 <b>staff at the time, with some fairly difficult</b></p> <p>25 <b>restraints. So I think the best was made of an</b></p> <p style="text-align: center;">Page 56</p>

<p>1 <b>incredibly bad job.</b></p> <p>2 Q. "Difficult" -- do you mean "constraints"?</p> <p>3 <b>A. The political drive to remove people across the Channel</b></p> <p>4 <b>in the small boats was difficult to keep up with.</b></p> <p>5 MS MOORE: Chair, I don't have any further questions for</p> <p>6 Mr Castle. The chair may have some questions for you</p> <p>7 now.</p> <p>8 Questions from THE CHAIR</p> <p>9 THE CHAIR: Mr Castle, I just have two brief questions for</p> <p>10 you. Ms Moore asked you some questions about</p> <p>11 rule 40/rule 42 and the interface with the Adults at</p> <p>12 Risk policy. Did you or anybody in your team ever have</p> <p>13 any training more broadly relating to mental health and</p> <p>14 any of the issues that are contained within the DSOs?</p> <p>15 <b>A. No. The only training that we may have received --</b></p> <p>16 <b>I don't remember receiving any, but possibly Jenny, as</b></p> <p>17 <b>the part of DCO -- the -- no, sorry, I'm getting myself</b></p> <p>18 <b>confused here. As the rule 40 expert, she may well have</b></p> <p>19 <b>had some training around what -- the expectation of</b></p> <p>20 <b>the quality of the document that was presented to us by</b></p> <p>21 <b>G4S.</b></p> <p>22 THE CHAIR: But you can't remember anything specific?</p> <p>23 <b>A. No, I'm sorry.</b></p> <p>24 THE CHAIR: That's fine. I don't want you to speculate. It</p> <p>25 is just if you can remember, thank you.</p> <p style="text-align: center;">Page 57</p>	<p>1 what you're telling me?</p> <p>2 <b>A. Possibly, yes.</b></p> <p>3 THE CHAIR: Thank you.</p> <p>4 <b>A. I'm sure he will be able to help.</b></p> <p>5 THE CHAIR: I have no other questions for you, Mr Castle.</p> <p>6 Thank you very much for coming this morning. I know it</p> <p>7 is not an easy experience, but it has been important to</p> <p>8 hear from you.</p> <p>9 Ms Moore?</p> <p>10 MS MOORE: Thank you, chair. We have Lee Hanford after the</p> <p>11 break. It is 11.20 am now. If we take a 20-minute</p> <p>12 break, until 11.40 am?</p> <p>13 THE CHAIR: Thank you very much. Thank you, Mr Castle.</p> <p>14 (The witness withdrew)</p> <p>15 (11.20 am)</p> <p>16 (A short break)</p> <p>17 (11.40 am)</p> <p>18 MR LEE HANFORD (sworn)</p> <p>19 Examination by MS TOWNSHEND</p> <p>20 MS TOWNSHEND: Good morning, chair. We will now be hearing</p> <p>21 from Lee Hanford. Mr Hanford, please could you give you</p> <p>22 full name to the inquiry?</p> <p>23 <b>A. Lee Hanford.</b></p> <p>24 Q. Is it correct that you have provided a witness statement</p> <p>25 to this inquiry? And the reference, chair, is</p> <p style="text-align: center;">Page 59</p>
<p>1 The other question I have is with regard to the</p> <p>2 performance indicators around where there were going to</p> <p>3 be penalties following self-harm incidents. Obviously,</p> <p>4 Ms Moore has explained that there were none of those</p> <p>5 reported, and so I realise that what I'm asking you is</p> <p>6 potentially a theoretical question. But we have seen</p> <p>7 through some of the documents that Ms Moore showed you</p> <p>8 that the penalties would only apply if a G4S failure had</p> <p>9 contributed to the self-harm.</p> <p>10 <b>A. Yes.</b></p> <p>11 THE CHAIR: How would the decision be made about whether</p> <p>12 there had been a failure on G4S's part? Would the</p> <p>13 Home Office make that decision? Would G4S make that</p> <p>14 decision?</p> <p>15 <b>A. So these were made at meetings with Paul Gasson and</b></p> <p>16 <b>Simon Murrell, the compliance managers. I would</b></p> <p>17 <b>imagine, if I -- if I recall correctly, G4S would</b></p> <p>18 <b>present the -- a list of failures with the mitigation at</b></p> <p>19 <b>the side, and Paul and/or Simon would have asked them</b></p> <p>20 <b>for more information, but I wasn't at those meetings.</b></p> <p>21 <b>But I would be pretty confident that they would ask for</b></p> <p>22 <b>any sort of clarification, clarity or evidence as well,</b></p> <p>23 <b>they wouldn't just accept their word for it, they would</b></p> <p>24 <b>be looking at evidence too.</b></p> <p>25 THE CHAIR: Perhaps a question for Mr Gasson, then, from</p> <p style="text-align: center;">Page 58</p>	<p>1 &lt;CJS0074048&gt;.</p> <p>2 <b>A. That's correct.</b></p> <p>3 Q. Chair, I would ask for this statement to be adduced,</p> <p>4 please?</p> <p>5 THE CHAIR: Thank you, indeed.</p> <p>6 MS TOWNSHEND: Mr Hanford, I first want to ask you about</p> <p>7 your roles in and around the relevant period at G4S and</p> <p>8 at Brook House. You provided a helpful overview in your</p> <p>9 witness statement at paragraphs 4 to 7. I won't ask you</p> <p>10 to look at them now. But, essentially, you have been</p> <p>11 employed at G4S Care and Rehabilitation Services since</p> <p>12 around April 2004; is that correct?</p> <p>13 <b>A. That's correct.</b></p> <p>14 Q. From 2006 to 2011, you were the business development and</p> <p>15 bid manager, which meant you managed bids for new prison</p> <p>16 contracts for G4S?</p> <p>17 <b>A. Correct.</b></p> <p>18 Q. Then, between 2011 and April 2014, you were the business</p> <p>19 development and mobilisation transition and</p> <p>20 transformation director, and this involved mobilisation</p> <p>21 of operational contracts following successful bids?</p> <p>22 <b>A. Yes, that's correct.</b></p> <p>23 Q. Then, between April 2014 and 2016, you were the</p> <p>24 operational development director. Before I get to the</p> <p>25 secondment that you took within that period, can you</p> <p style="text-align: center;">Page 60</p>

<p>1 explain, what is an operational development director in</p> <p>2 layman's speak?</p> <p>3 <b>A. In layman's speak, it was supporting the managing</b></p> <p>4 <b>director of the organisation, overseeing sort of</b></p> <p>5 <b>operational activities across the wider care and justice</b></p> <p>6 <b>estate, really, looking after our prisons and</b></p> <p>7 <b>immigration centres.</b></p> <p>8 Q. In terms of just before the relevant period, you were</p> <p>9 seconded as the interim director of Gatwick IRCs</p> <p>10 between February and June 2016?</p> <p>11 <b>A. That's correct.</b></p> <p>12 Q. Within that role, you had responsibility for the</p> <p>13 management of Brook House, Tinsley House and Cedars</p> <p>14 whilst the director, Ben Saunders, was seconded to</p> <p>15 Medway?</p> <p>16 <b>A. Yes.</b></p> <p>17 Q. During the relevant period, you were a business change</p> <p>18 director from 2016 to 2019. Again, can you explain in</p> <p>19 layman's terms what a "business change director" means?</p> <p>20 <b>A. Generally, that was when we had some issues that arose</b></p> <p>21 <b>from activities across other sites where they'd been</b></p> <p>22 <b>managing recommendations and overseeing the</b></p> <p>23 <b>recommendations from observers, such as the IMB, HMIP,</b></p> <p>24 <b>et cetera, engaging with the onsite contract directors</b></p> <p>25 <b>to ensure they were delivered in accordance with the</b></p> <p style="text-align: center;">Page 61</p>	<p>1 <b>structure. We would maintain a relationship as</b></p> <p>2 <b>a tripartite relationship between the onsite silver</b></p> <p>3 <b>commander with the relevant gold commander, whether that</b></p> <p>4 <b>be HMPPS or the IRC, in this instance, and the G4S gold</b></p> <p>5 <b>commander.</b></p> <p>6 Q. In terms of what you would be doing day to day as a gold</p> <p>7 commander, is it right that you would have</p> <p>8 responsibility for the management of serious incidents</p> <p>9 that came up within a centre with one of those three</p> <p>10 centres?</p> <p>11 <b>A. Only serious incidents that occurred which required the</b></p> <p>12 <b>incident command suite to be opened.</b></p> <p>13 Q. Indeed. Would one of those serious incidents be when</p> <p>14 a detained person was on the netting, on the suicide</p> <p>15 netting?</p> <p>16 <b>A. Not necessarily. It depends on the time of their period</b></p> <p>17 <b>on the netting. If it is there for an extended period,</b></p> <p>18 <b>then, yes, you would be called upon. Again, only if the</b></p> <p>19 <b>command suite had been opened in the local facility.</b></p> <p>20 Q. Was there more than one gold commander acting at any one</p> <p>21 time or was there just one, for example, for</p> <p>22 Brook House?</p> <p>23 <b>A. For Brook -- well, for our own business across G4S,</b></p> <p>24 <b>there was one gold commander at any one time supporting</b></p> <p>25 <b>all of our contracts, and that would be on a rolling</b></p> <p style="text-align: center;">Page 63</p>
<p>1 <b>relevant action plans.</b></p> <p>2 Q. During that period, again, you were seconded as, again,</p> <p>3 interim director for a second period of Gatwick IRCs</p> <p>4 following the airing of Panorama?</p> <p>5 <b>A. That's correct.</b></p> <p>6 Q. So that was between September -- the</p> <p>7 two Septembers, September 2007 and 2008?</p> <p>8 <b>A. '18, yes.</b></p> <p>9 Q. '18, I'm sorry, 2017 and 2018?</p> <p>10 <b>A. Yes.</b></p> <p>11 Q. After that period, you became operational support</p> <p>12 director, and then, more recently, from February 2021,</p> <p>13 the chief operating director for G4S Care and</p> <p>14 Rehabilitation Services?</p> <p>15 <b>A. Yes.</b></p> <p>16 Q. I want to ask you about your role as a gold commander,</p> <p>17 because you have been a gold commander throughout this</p> <p>18 period, or at least from 2011. Can you explain what</p> <p>19 a gold commander's role is?</p> <p>20 <b>A. The gold commander's activities are that you are alerted</b></p> <p>21 <b>when there may be a serious incident at a particular</b></p> <p>22 <b>establishment, and you -- in terms of -- we will have</b></p> <p>23 <b>our own G4S gold command structure; Home Office, within</b></p> <p>24 <b>the IRC estate, will have their own gold command</b></p> <p>25 <b>structure; and HMPPS would have their gold command</b></p> <p style="text-align: center;">Page 62</p>	<p>1 <b>programme, sort of there were three of us sharing the</b></p> <p>2 <b>rolling programme of gold command.</b></p> <p>3 Q. Was one of the other gold commanders Jerry Petherick?</p> <p>4 <b>A. He was.</b></p> <p>5 Q. Do you remember any times within the relevant period, so</p> <p>6 in 2017, April to August, where you were the gold</p> <p>7 commander when there was a serious incident which</p> <p>8 required you to act?</p> <p>9 <b>A. Yes, I think it was within the relevant period. There</b></p> <p>10 <b>was an issue on the yard where a number of detainees --</b></p> <p>11 <b>there was some intelligence to suggest they may protest</b></p> <p>12 <b>and go on the yard, which we'd experienced a number of</b></p> <p>13 <b>times over the years. If we are talking about the same</b></p> <p>14 <b>incident, it's when Sarah Newland was the duty director</b></p> <p>15 <b>on call, and she engaged me -- with me to advise what</b></p> <p>16 <b>was occurring, my advice to her was to return back to</b></p> <p>17 <b>the establishment, open the command suite and we'd</b></p> <p>18 <b>engage.</b></p> <p>19 Q. What was the result of that? What happened?</p> <p>20 <b>A. It was a peaceful resolution and, yeah, I think by the</b></p> <p>21 <b>time I'd got back to -- become deskbound, the incident,</b></p> <p>22 <b>had been resolved.</b></p> <p>23 Q. Were you ever involved in incidents -- in managing</p> <p>24 incidents on the netting during --</p> <p>25 <b>A. At Brook House, no -- not in this period. In 2016,</b></p> <p style="text-align: center;">Page 64</p>



<p>1 I was, yes, sorry.</p> <p>2 Q. During those incidents, is it right that, generally, the</p> <p>3 National Tactical Response Group, the NTRG, is called to</p> <p>4 manage those incidents?</p> <p>5 A. No. Only if it's a prolonged incident. So very often</p> <p>6 we'd engage and negotiate because, very often, it would</p> <p>7 be quite short term, 25/30 minutes. When we encroach</p> <p>8 into longer periods of time, then we would engage with</p> <p>9 the -- to seek mutual aid and national resource because</p> <p>10 we can't intervene. It has to be from the National</p> <p>11 team.</p> <p>12 Q. In that experience that you have just said in 2016, were</p> <p>13 the NTRG called?</p> <p>14 A. No.</p> <p>15 Q. You said they have to be called when they're for a long</p> <p>16 period, why do they have to be --</p> <p>17 A. If I can correct, the reason I was involved in 2016 not</p> <p>18 as gold commander, it was during my time as the director</p> <p>19 at Brook House, but we didn't open the command suite on</p> <p>20 that occasion, sorry.</p> <p>21 Q. So the NTRG were not called?</p> <p>22 A. Not at that 2016.</p> <p>23 Q. What crosses the threshold of when the NTRG is called?</p> <p>24 A. Very often, time. Time and when you're negotiating and</p> <p>25 not building up that rapport with an individual. At</p> <p style="text-align: center;">Page 65</p>	<p>1 expansive, so we introduced a head of support services</p> <p>2 and -- or support services manager, which Dan Haughton</p> <p>3 stepped into. We then introduced Michelle Brown as the</p> <p>4 head of safeguarding, because I was sighted on the works</p> <p>5 prior to my time as the Brook House interim director,</p> <p>6 worked with the Stephen Shaw Adults at Risk policy and</p> <p>7 I thought it was critical we introduced the head of</p> <p>8 safeguarding to take ownership of what was potentially</p> <p>9 coming down the line in terms of the recommendations</p> <p>10 from the Stephen Shaw report. So the head of</p> <p>11 safeguarding was introduced. I think, by the time we'd</p> <p>12 recruited a (inaudible), I'd made the recommendation --</p> <p>13 I think you've got the minutes of the meeting of when it</p> <p>14 was to introduce, around May/June 2016, I think. In</p> <p>15 preparation for Ben to return to Brook House, we ensured</p> <p>16 there was a head of safeguarding in place to deal with</p> <p>17 what was -- we knew was on the horizon, ie the Shaw</p> <p>18 recommendations.</p> <p>19 Q. Thank you. That was topic I was going to come on to, so</p> <p>20 you have answered that question. I want to also ask you</p> <p>21 about what you have said in your -- one of your Verita</p> <p>22 interviews. No need to bring it up. But you said that</p> <p>23 there was previously some difficult dynamics amongst the</p> <p>24 senior team and this then led to a management</p> <p>25 restructure. You also said that there were some</p> <p style="text-align: center;">Page 67</p>
<p>1 that point in time, then it needs some resolution</p> <p>2 because you're going to have to, at some point, get back</p> <p>3 to a normal regime. We have all seen incidences when</p> <p>4 it's escalated from the netting to major disturbances,</p> <p>5 so time is the critical factor and time when those</p> <p>6 aren't engaging with you to come to a peaceful</p> <p>7 resolution.</p> <p>8 Q. I want to ask you now about the management structure at</p> <p>9 Brook House in 2016 when you were first seconded to be</p> <p>10 deputy director. You say in your witness statement,</p> <p>11 paragraph 17, that between February and June,</p> <p>12 Steve Skitt was the deputy director, who reported to</p> <p>13 you. Then Neil Davies, who is head of security -- was</p> <p>14 head of security, Michelle Smith, head of care and</p> <p>15 regimes, and Jules Williams was residential manager, as</p> <p>16 well as Stacie Dean being head of Tinsley House, who</p> <p>17 reported directly to Steve Skitt.</p> <p>18 That changed then in 2017/2018, where Sarah Newland</p> <p>19 reported to Skitt and Sara Edwards was appointed as</p> <p>20 safeguarding manager. Why was she appointed to</p> <p>21 safeguarding manager at that time?</p> <p>22 A. Forgive me, I think you missed a stage there. I think</p> <p>23 the stage you missed is when, in 2016, in March 2016,</p> <p>24 I introduced the head of safeguarding. Michelle Brown,</p> <p>25 as you say, was safety and regimes. That role was too</p> <p style="text-align: center;">Page 66</p>	<p>1 difficult relationships with Ben Saunders due to</p> <p>2 the number of grievances he had been subject to. What</p> <p>3 in particular are you referring to in relation to</p> <p>4 Ben Saunders?</p> <p>5 A. If I can add context, it wasn't as a -- we didn't</p> <p>6 restructure as a consequence of that. When Kate</p> <p>7 interviewed me, it was more in relation to what had</p> <p>8 occurred previously at Brook House.</p> <p>9 Q. Just pause there. Kate Lampard, who was one of the --</p> <p>10 A. Kate Lampard, sorry, forgive me. When Kate Lampard</p> <p>11 interviewed me, it was on reflection of what had</p> <p>12 occurred at Brook House over a time. I think you will</p> <p>13 see quite a bit of evidence where I'd been commissioned</p> <p>14 by Jerry Petherick, our MD, to conduct a number of</p> <p>15 grievance investigations in relation to Ben and some of</p> <p>16 his senior management team over different periods of</p> <p>17 time. So I think that's -- it wasn't aligned to</p> <p>18 a restructure, it was Kate Lampard's engagement with me</p> <p>19 to understand what the relationships were amongst the</p> <p>20 SMT.</p> <p>21 Q. What you said to Kate Lampard in your Verita interview</p> <p>22 about difficult dynamics amongst the senior staff, that</p> <p>23 included Ben Saunders, I presume?</p> <p>24 A. Yes, of course. So that's the context to it. So you</p> <p>25 could see that over a number of years he'd been subject</p> <p style="text-align: center;">Page 68</p>

<p>1 to a number of grievances from a previous head of</p> <p>2 security, Wayne Debnam, a previous deputy director,</p> <p>3 Duncan Partridge, an issue arising with Stacie Dean and</p> <p>4 Michelle Smith. So there were a number of issues, and</p> <p>5 I think Ben even shares it within his own statement</p> <p>6 previously that there were some difficult relationships</p> <p>7 with his team at that time.</p> <p>8 Q. Did you form a view about the leadership of</p> <p>9 Ben Saunders?</p> <p>10 A. I think it's in my statement. Ben was very credible.</p> <p>11 He cared for those in his care. He seen the day-to-day</p> <p>12 delivery to be managed by Steve Skitt or by his previous</p> <p>13 deputy, Duncan Partridge, and he would take a more</p> <p>14 holistic overview of it being managed from a business</p> <p>15 perspective, if I can say that. We -- I think Ben</p> <p>16 acknowledges that himself.</p> <p>17 Q. If we can put on the screen, please, one of your Verita</p> <p>18 interviews, I think it is the first one, &lt;VER000266&gt;</p> <p>19 page 15, please. The answer at 198. You will see the</p> <p>20 question:</p> <p>21 "Question: Hang on, you have to go slowly on all of</p> <p>22 this because our heads are exploding?</p> <p>23 "Answer: It's like Emmerdale. The reason I know</p> <p>24 this is because I ended up coming down to do the</p> <p>25 grievance investigations."</p> <p style="text-align: center;">Page 69</p>	<p>1 Emmerdale here", so it was a loose term and forgive me</p> <p>2 on that loose term. But, yes, there was obviously an</p> <p>3 element of chaoticness amongst our senior management</p> <p>4 team for the number of -- it is a very small team and</p> <p>5 the number of grievances, you know, being -- and I think</p> <p>6 what I described then, in terms of that culture, was</p> <p>7 being observed by others within the centre. What</p> <p>8 I inherited, particularly, in 2017, were a number of</p> <p>9 grievances aimed from peers to peers also. There was --</p> <p>10 there didn't seem to be sufficient engagement to</p> <p>11 intervene at the right level. So there was a lot of --</p> <p>12 when I tried engaging with the staff to understand why</p> <p>13 there were so many grievances, because I've worked in</p> <p>14 the custodial environment for 31 years and this was</p> <p>15 the -- I hadn't seen so many grievances from colleague</p> <p>16 to colleague and manager to manager together. The</p> <p>17 engagement from staff was -- the feedbacks tended to be,</p> <p>18 "Well, that's how we deal with issues" because that's</p> <p>19 what they were experiencing from those above them. Does</p> <p>20 that add context?</p> <p>21 Q. Yes. Why do you think there were so many grievances</p> <p>22 within the senior management team? You said that</p> <p>23 it's -- it came from above, that kind of attitude. But</p> <p>24 why was the problem within the senior management team?</p> <p>25 A. Well, it was apparent there were some difficult</p> <p style="text-align: center;">Page 71</p>
<p>1 If we can then turn over the page, please, sorry,</p> <p>2 the next page, answer 238. The question is:</p> <p>3 "Question: It does sound as if Emmerdale is a good</p> <p>4 way of describing it. The sort of operational impact of</p> <p>5 this, from your perspective, just coming in and doing</p> <p>6 grievances, it can't be helpful --</p> <p>7 "Answer: It's never helpful, is it, if the top team</p> <p>8 can't get their act together. I think as a consequence</p> <p>9 of that, the number of grievances that are on there at</p> <p>10 the moment are quite toxic. I've had to call people</p> <p>11 from external to Brook House to conduct grievances,</p> <p>12 that's why I'm saying it's not high churn, really,</p> <p>13 amongst the manager grades, but there have been quite</p> <p>14 a lot of grievances aimed at one another."</p> <p>15 What did you mean exactly by comparing it to</p> <p>16 Emmerdale? What was the problem, in your view?</p> <p>17 A. I think the problem is evident and I think I've already</p> <p>18 alluded to that problem. There were so many grievances</p> <p>19 out amongst the senior management team. In terms of</p> <p>20 the Emmerdale, it was a loose statement because</p> <p>21 Kate Lampard -- when I described, as I did with you</p> <p>22 a few moments ago, the number of grievances,</p> <p>23 Kate Lampard was, you know, hands to the head and she</p> <p>24 said, "It's spinning me, I'm trying to understand what</p> <p>25 was going on", and I said, "Yeah, it's a bit like</p> <p style="text-align: center;">Page 70</p>	<p>1 relationships between the senior managers there at the</p> <p>2 time. When I attended there in 2017, one of the senior</p> <p>3 managers was on long-term absence. I met with -- sorry,</p> <p>4 not -- on the first time, 2016, sorry. So I met with</p> <p>5 her offsite to understand what the issues were, and</p> <p>6 worked to understand what the concerns were, and</p> <p>7 I think, as I shared with you earlier, there was</p> <p>8 a stretch of workload, hence why I restructured in terms</p> <p>9 of the dispersing some responsibilities, introducing</p> <p>10 other senior managers, people who felt confident that</p> <p>11 what they were expected to deliver, they had capacity to</p> <p>12 deliver.</p> <p>13 Q. The person you met offsite, was that Michelle Brown?</p> <p>14 A. It was, yes.</p> <p>15 Q. You mention there about staff saying that there were</p> <p>16 attitudes above them, issue of grievances, the culture</p> <p>17 of grievances, which filtered down to the staff. The</p> <p>18 word "toxic" has been used a lot within this inquiry?</p> <p>19 A. It was used by me on the first instance on this.</p> <p>20 I understand that, in a different context. If I add to</p> <p>21 that, if I can, there was -- the relationship that had</p> <p>22 broken down between Duncan and -- Duncan Partridge and</p> <p>23 Ben Saunders, as I said, I was commissioned to</p> <p>24 investigate that, because Duncan Partridge had raised</p> <p>25 a grievance against Ben. There was clearly -- that</p> <p style="text-align: center;">Page 72</p>

<p>1 message had been dispersed across the centre. People</p> <p>2 knew there were two camps on site. And that wasn't --</p> <p>3 you know, that wasn't good role modelling from senior</p> <p>4 managers.</p> <p>5 Q. As you said about the toxic culture within the senior</p> <p>6 management team, I think that's fair to say that --</p> <p>7 <b>A. They were my words at the time, so yes.</b></p> <p>8 Q. Yes. We have also talked about the toxicity possibly</p> <p>9 cascading down towards the more-junior-level staff?</p> <p>10 <b>A. In terms of how they dealt with issues with one another,</b></p> <p>11 <b>yes. Not wider culture in terms of how they treated</b></p> <p>12 <b>those in their care.</b></p> <p>13 Q. So that's what --</p> <p>14 <b>A. But in terms of how they dealt with -- when they had</b></p> <p>15 <b>concerns with one another, and we can discuss in a few</b></p> <p>16 <b>moments in terms of my need to -- in 2017, to introduce</b></p> <p>17 <b>more front-line managers, really, so I had concerns</b></p> <p>18 <b>about peers managing peers, but as -- we needed to</b></p> <p>19 <b>introduce that management structure in place, because</b></p> <p>20 <b>when individuals were clashing with one another, their</b></p> <p>21 <b>first port of call was to submit a grievance of</b></p> <p>22 <b>the behaviours.</b></p> <p>23 Q. We will come on to that solution that you proposed in</p> <p>24 a moment.</p> <p>25 <b>A. Yes, of course.</b></p> <p style="text-align: center;">Page 73</p>	<p>1 they thought that was the -- that was the route to</p> <p>2 address that, to the abhorrent behaviours we have seen</p> <p>3 in the stairwell. So I do not see a direct correlation</p> <p>4 between the two relationships.</p> <p>5 Q. What about the macho culture within Brook House amongst</p> <p>6 the staff? Did you observe that at any point?</p> <p>7 <b>A. No, I didn't. When I was there in 2016, what I observed</b></p> <p>8 <b>was a very professional staff group, and I think,</b></p> <p>9 <b>post Panorama -- if I can reflect on this,</b></p> <p>10 <b>post Panorama, of course, you look at yourself in the</b></p> <p>11 <b>mirror and say, "I've spent some time in there. I spent</b></p> <p>12 <b>five months in there last year. Why didn't I witness</b></p> <p>13 <b>that?" I have been in this industry for 31 years in the</b></p> <p>14 <b>custodial sector and, over the years, I've observed some</b></p> <p>15 <b>inappropriate behaviours and we have made sure that</b></p> <p>16 <b>we've either engaged with the police to challenge such</b></p> <p>17 <b>behaviours -- and we have dismissed people for such</b></p> <p>18 <b>behaviours, whether that was in the public sector or the</b></p> <p>19 <b>private sector.</b></p> <p>20 <b>So what we observed there was, as I said, abhorrent</b></p> <p>21 <b>behaviours. What I observed when I was there in 2016</b></p> <p>22 <b>and what I was then pleased when I looked at the HMIP</b></p> <p>23 <b>report, which was published in January 2017, that</b></p> <p>24 <b>confirmed my views as well: the staff were doing an</b></p> <p>25 <b>excellent job in very difficult circumstances in</b></p> <p style="text-align: center;">Page 75</p>
<p>1 Q. But in terms of that toxicity and the cascading down of</p> <p>2 the toxicity from senior management --</p> <p>3 <b>A. I don't think there's a correlation between</b></p> <p>4 <b>relationships between one another towards their</b></p> <p>5 <b>relationships with detainees.</b></p> <p>6 Q. What about something that -- I don't know if you have</p> <p>7 been watching some of the witnesses give evidence.</p> <p>8 John Connolly, who gave evidence, he agreed with counsel</p> <p>9 to the inquiry, Mr Altman QC, about the glorification of</p> <p>10 violence. He was talking about a specific incident</p> <p>11 where a detainee was on the netting and he was in the</p> <p>12 stairwell, and he accepted that it leads to a contagion</p> <p>13 of toxicity within the establishment, specifically</p> <p>14 talking about the glorification of violence. Do you</p> <p>15 agree with John Connolly that there was a glorification</p> <p>16 of violence which cascaded down to the way staff treated</p> <p>17 detainees?</p> <p>18 <b>A. No, that's why I said I don't think there's</b></p> <p>19 <b>a correlation between people's relationship management,</b></p> <p>20 <b>they're not dealing with issues through immediate</b></p> <p>21 <b>intervention of and supporting one another, to the</b></p> <p>22 <b>atrocious behaviours we have seen of people such as</b></p> <p>23 <b>John Connolly in the stairwell. There is no correlation</b></p> <p>24 <b>between people having personal relationships and their</b></p> <p>25 <b>method of addressing that was through grievance, because</b></p> <p style="text-align: center;">Page 74</p>	<p>1 <b>Brook House. We understand there are a very small</b></p> <p>2 <b>minority who have engaged in the way they have and, you</b></p> <p>3 <b>know, as myself, we engage with the police as well to</b></p> <p>4 <b>ensure that they're prosecuted for their behaviours not</b></p> <p>5 <b>just dismissed from employment. But the behaviours</b></p> <p>6 <b>I have seen generally and the relationships I've seen</b></p> <p>7 <b>between staff and detainees was excellent at</b></p> <p>8 <b>Brook House.</b></p> <p>9 Q. Aside from what we saw from Panorama?</p> <p>10 <b>A. Aside from -- as I have just said, aside from what we</b></p> <p>11 <b>have seen there, absolutely.</b></p> <p>12 Q. Is it possible to put that to one side, given that there</p> <p>13 was such a long period of filming of --</p> <p>14 <b>A. No, and as I said, retrospectively, I would never put</b></p> <p>15 <b>that aside. There has to be some significant learning</b></p> <p>16 <b>for all. As I said, I looked at myself in the mirror</b></p> <p>17 <b>when I observed Panorama in 2017 because I'd been there</b></p> <p>18 <b>sort of 15/18 months prior to that. So, no, you</b></p> <p>19 <b>wouldn't put that aside. But I do -- I really relate</b></p> <p>20 <b>what I said to -- a few moments ago: the behaviours you</b></p> <p>21 <b>see from the majority of staff, their relationships with</b></p> <p>22 <b>detainees, were excellent.</b></p> <p>23 Q. I want to ask you about something we just mentioned</p> <p>24 earlier about your solution to the issue about there</p> <p>25 being lots of different grievances within the senior</p> <p style="text-align: center;">Page 76</p>

<p>1 management team and how dysfunctional it was. You also</p> <p>2 describe in your Verita interview about there being</p> <p>3 a management by matrix. Could you explain what you</p> <p>4 meant by that and also what the proposed solution was?</p> <p>5 <b>A. Of course, yes. So I think, as I shared with you</b></p> <p>6 <b>earlier, there was, my personal view, insufficient</b></p> <p>7 <b>senior managers. The seed was initially planted by</b></p> <p>8 <b>Michelle Brown when I met her off site, really, prior to</b></p> <p>9 <b>look at how we could support Michelle to come back to</b></p> <p>10 <b>work. When I realised the broad range of activities</b></p> <p>11 <b>that Michelle was trying to manage at that point, that</b></p> <p>12 <b>gave me the opportunity to review and reflect on the</b></p> <p>13 <b>current senior management team. When we -- and we did,</b></p> <p>14 <b>we introduced the head of support services, the head of</b></p> <p>15 <b>safeguarding in preparation for the Stephen Shaw</b></p> <p>16 <b>recommendations in relation to Adults at Risk.</b></p> <p>17 <b>And that seemed to be -- do in 2016, that seemed to</b></p> <p>18 <b>put everything back in its place where we had some</b></p> <p>19 <b>structure amongst the senior management team. At that</b></p> <p>20 <b>point in time, there were no real issues amongst the</b></p> <p>21 <b>DCMs because we hadn't experienced what we all know</b></p> <p>22 <b>with -- through a retrospective lens, we have all seen</b></p> <p>23 <b>what happened in 2017, particularly with -- if I can</b></p> <p>24 <b>align it to what was happening in the wider custodial</b></p> <p>25 <b>state, late 2016, was -- had a major influence on what</b></p> <p style="text-align: center;">Page 77</p>	<p>1 <b>of DCMs to ensure that -- because when staff -- when we</b></p> <p>2 <b>engage with staff to understand what they wanted from</b></p> <p>3 <b>managers, it wasn't seeing the centre director walking</b></p> <p>4 <b>around every day, which would only spend 15, 20 minutes,</b></p> <p>5 <b>if you could get it on then, at different points in</b></p> <p>6 <b>time. They wanted a direct front-line supervisor to</b></p> <p>7 <b>give them that support. A staff front-line supervisor</b></p> <p>8 <b>is there to give them that support throughout the day.</b></p> <p>9 <b>So that moved us away from matrix management, both back</b></p> <p>10 <b>to a more traditional hierarchy where the staff --</b></p> <p>11 <b>because we had very inexperienced -- very much a high</b></p> <p>12 <b>level of inexperienced staff there, they could have and</b></p> <p>13 <b>seek that immediate support from their supervisors.</b></p> <p>14 <b>Q. You mention there about the director coming around and</b></p> <p>15 <b>being on the wing for 15 or 20 minutes a day. You also</b></p> <p>16 <b>say in your statement that managers need to be more</b></p> <p>17 <b>visible and show support to staff. That was from an SMT</b></p> <p>18 <b>meeting that you were commenting about from April 2016?</b></p> <p>19 <b>A. '16 that was, yes.</b></p> <p>20 <b>Q. There was also -- that was a comment, sorry, by</b></p> <p>21 <b>Steve Skitt and that was a comment that you supported.</b></p> <p>22 <b>A. Yes.</b></p> <p>23 <b>Q. You said it was important to check in on areas they</b></p> <p>24 <b>didn't manage, talking about managers, in order to raise</b></p> <p>25 <b>and maintain challenge.</b></p> <p style="text-align: center;">Page 79</p>
<p>1 occurred within the immigration estate in 2017. We'd</p> <p>2 seen a number of major prison disturbances as</p> <p>3 a consequence of spice. We had seen that at Bedford,</p> <p>4 we'd seen it in Birmingham, we'd seen it in Swaleside.</p> <p>5 And aligned to that, there were the closures of --</p> <p>6 within the IRC estate, Dover, Haslar, et cetera. So</p> <p>7 a lot of the population that was coming into the IRC</p> <p>8 estate were coming from the prisons and I think we will</p> <p>9 discuss it at some point later. Time-served foreign</p> <p>10 national offenders in the custodial estate -- in the IRC</p> <p>11 in 2013, as per the HMIP report, were at 5 per cent. In</p> <p>12 2017, they were between 50 and 55 per cent. So the</p> <p>13 whole population mix had changed.</p> <p>14 As a consequence of that, you could see the DCMs --</p> <p>15 we all see the spice endemic and you could see that DCMs</p> <p>16 were responding to incidents and had insufficient time</p> <p>17 to actually manage the resource that they would normally</p> <p>18 do. So when I discussed matrix management -- forgive me</p> <p>19 for adding so much context to it -- was that when we</p> <p>20 were trying to manage functions, the members of staff on</p> <p>21 the front-line didn't have a direct line manager to</p> <p>22 engage with for their own personal development and for</p> <p>23 advice and guidance, and where the matrix management</p> <p>24 occurred was that they were looking up but managers were</p> <p>25 just filling in, hence why we then increased the number</p> <p style="text-align: center;">Page 78</p>	<p>1 <b>A. Absolutely.</b></p> <p>2 <b>Q. What caused you to say this, to raise that?</b></p> <p>3 <b>A. I think Steve raised it.</b></p> <p>4 <b>Q. Steve raised it, sorry.</b></p> <p>5 <b>A. Yes, yeah, yeah.</b></p> <p>6 <b>Q. What caused you to say about the issues about different</b></p> <p>7 <b>managers going to different wings, I assume, in order to</b></p> <p>8 <b>challenge what was going on in each wing?</b></p> <p>9 <b>A. Absolutely. If you walked the same plot every day,</b></p> <p>10 <b>you'd become quite sort of blinded to what's happening</b></p> <p>11 <b>wider, whereas, if we can encourage managers to walk</b></p> <p>12 <b>into different departments, you're looking at it through</b></p> <p>13 <b>a different lens. By looking at it through a different</b></p> <p>14 <b>lens, you can provide better ideas and give some</b></p> <p>15 <b>feedback, really. So it was ensuring that people didn't</b></p> <p>16 <b>just focus on their own area, it's walk on the areas of</b></p> <p>17 <b>other, not just on the residential units, all areas, to</b></p> <p>18 <b>improve the standards within the facility and be quite</b></p> <p>19 <b>candid with one another, ensure that you are giving</b></p> <p>20 <b>constructive feedback to ensure that standards were</b></p> <p>21 <b>raised.</b></p> <p>22 <b>Q. We have heard from many witnesses to the inquiry that</b></p> <p>23 <b>senior managers were not visible on the wings in 2017.</b></p> <p>24 <b>You made these comments in April 2016. Had this</b></p> <p>25 <b>improved by the time you'd returned to Brook House</b></p> <p style="text-align: center;">Page 80</p>

<p>1 in September 2017?</p> <p>2 <b>A. I would suggest, by September 2017, it was still -- they</b></p> <p>3 <b>were still stretched there. You will see that we then</b></p> <p>4 <b>introduced another senior manager, forgive me. The</b></p> <p>5 <b>engagement we were having with staff was that they</b></p> <p>6 <b>wanted -- as I alluded to a few moments ago, they wanted</b></p> <p>7 <b>access to their supervisors. Yes, we encouraged the</b></p> <p>8 <b>senior management team to walk about, to be visible, to</b></p> <p>9 <b>understand what was occurring, because you never know --</b></p> <p>10 <b>unless you do a bit of management by walkabouts, you</b></p> <p>11 <b>never know what's happening on that front-line. So,</b></p> <p>12 <b>yeah, there was a need for managers to be present on the</b></p> <p>13 <b>unit, but I think, as all managers will say -- all staff</b></p> <p>14 <b>will say, what they wanted was the direct supervision,</b></p> <p>15 <b>as I described earlier.</b></p> <p>16 <b>Q. I want to ask you now about detained persons' welfare</b></p> <p>17 <b>and the engagement with detained persons. In a Cedars</b></p> <p>18 <b>management meeting on 30 March 2016, you said</b></p> <p>19 <b>improvements to welfare led to it being a victim of its</b></p> <p>20 <b>own success as it is being signposted to deal with</b></p> <p>21 <b>everything. By that, I assume you mean the</b></p> <p>22 <b>welfare department, the welfare team. Why did you say</b></p> <p>23 <b>that, given that there's a dedicated team there? Why</b></p> <p>24 <b>was it a victim of its own success?</b></p> <p>25 <b>A. In fact, that was praise, "victim of its own success",</b></p> <p style="text-align: center;">Page 81</p>	<p>1 <b>well they were doing. We then increased the size of</b></p> <p>2 <b>the team, introduced a booking system, et cetera, but</b></p> <p>3 <b>still that was subject to some form of conflict in the</b></p> <p>4 <b>areas because everyone wanted to see that welfare</b></p> <p>5 <b>officer, so we invested in increasing the team.</b></p> <p>6 <b>We then put it into the -- off the main thoroughfare</b></p> <p>7 <b>corridor into the legal visits area so people would need</b></p> <p>8 <b>to book to access the visit. I understand that that's</b></p> <p>9 <b>been reversed and it is now back in the thoroughfare,</b></p> <p>10 <b>which seems to be a better system in place.</b></p> <p>11 <b>Q. I want to ask you about detainee consultative meetings.</b></p> <p>12 <b>During a meeting that you chaired, the one we have just</b></p> <p>13 <b>been talking about -- in fact, no, a few weeks earlier,</b></p> <p>14 <b>sorry, 3 March 2016, you said you wanted more structure</b></p> <p>15 <b>to detainee consultative forums. There is a need to</b></p> <p>16 <b>decide which managers should or should not attend. Who</b></p> <p>17 <b>would normally have attended those detainee consultative</b></p> <p>18 <b>meetings?</b></p> <p>19 <b>A. Generally, I think it would have been Steve as the</b></p> <p>20 <b>deputy, Steve Skitt as the deputy, a member of</b></p> <p>21 <b>the Home Office staff -- at the time I think it was</b></p> <p>22 <b>Simon Levitt. The members of the IMB would be invited</b></p> <p>23 <b>and the representatives from each of the units.</b></p> <p>24 <b>I attended a number myself. The reason I think I was</b></p> <p>25 <b>asking for more structure at the time, I think that was</b></p> <p style="text-align: center;">Page 83</p>
<p>1 <b>because they were an excellent team. I think you've</b></p> <p>2 <b>interviewed one of the welfare officers, Owen Syred, his</b></p> <p>3 <b>work with detainees was phenomenal. He really cared.</b></p> <p>4 <b>He would go that extra mile for the individuals. The</b></p> <p>5 <b>welfare office was in the main thoroughfare of</b></p> <p>6 <b>the facility and a lot of the detainees' frustrations</b></p> <p>7 <b>was aimed at -- everyone had hope. They all hoped they</b></p> <p>8 <b>could remain in the UK, of course they could, and they</b></p> <p>9 <b>would reach out and try and engage with the Home Office</b></p> <p>10 <b>to have an update on their case, because indefinite</b></p> <p>11 <b>detention was very frustrating for them.</b></p> <p>12 <b>Owen and the team would work with them very closely</b></p> <p>13 <b>to understand -- a lot of the time it was signposting</b></p> <p>14 <b>because they couldn't do much else than that. But the</b></p> <p>15 <b>welfare team was an innovation -- again, I think</b></p> <p>16 <b>Michelle Brown was a driver behind the support in the</b></p> <p>17 <b>welfare team.</b></p> <p>18 <b>But why it became a victim of its own success, being</b></p> <p>19 <b>in that main thoroughfare, which is basically part of</b></p> <p>20 <b>the centre, it was, in some respects, the strongest</b></p> <p>21 <b>survived. Some detainees were pushing themselves and</b></p> <p>22 <b>pushing their way in or barging into the office to have</b></p> <p>23 <b>access to the welfare team, because they were in demand.</b></p> <p>24 <b>We did then -- as a consequence of -- I think the term</b></p> <p>25 <b>"victim of its own success" was a celebration of how</b></p> <p style="text-align: center;">Page 82</p>	<p>1 <b>one month into my -- generally, that's why I stepped in</b></p> <p>2 <b>to get to know the detainees initially. What their</b></p> <p>3 <b>frustrations were was that, when they raised an issue,</b></p> <p>4 <b>they were recalling that they raised it with another</b></p> <p>5 <b>manager last month, and, as in any structured, agendaed</b></p> <p>6 <b>meeting, we would want the regular attendees. So it was</b></p> <p>7 <b>to improve -- I think the process was very good. It was</b></p> <p>8 <b>to improve the process to ensure there was continuity in</b></p> <p>9 <b>the relationship between those present.</b></p> <p>10 <b>Q. So before you arrived, there wasn't an agenda for the</b></p> <p>11 <b>meeting?</b></p> <p>12 <b>A. No, there was an agenda, but it was potentially chaired</b></p> <p>13 <b>by different people.</b></p> <p>14 <b>Q. I see. So it should be the same manager who chaired the</b></p> <p>15 <b>meeting?</b></p> <p>16 <b>A. Ideally, I wanted continuity, so that at least the</b></p> <p>17 <b>detainees were having direct feedback from those who</b></p> <p>18 <b>were taking the actions.</b></p> <p>19 <b>Q. I want to move to a short, quick other topic about</b></p> <p>20 <b>no-notice charters. You raised concerns in IMB meetings</b></p> <p>21 <b>in November and December 2017 about no-notice charters.</b></p> <p>22 <b>They are charter flights that take place in</b></p> <p>23 <b>a three-month window and are not told to detainees when</b></p> <p>24 <b>they will be going on them.</b></p> <p>25 <b>What concerns did you have about these and why?</b></p> <p style="text-align: center;">Page 84</p>

<p>1 A. The concerns I have is -- if I can, I don't think this 2 can be quick, because this was so detrimental to the 3 relationships within the centre. No-notice charters, 4 you'll see from the evidence within the IMB, I shared it 5 with senior civil servants who attended, senior 6 Home Office officials. The MP who would attend, 7 I raised my concerns about no-notice charters. They 8 were having a detrimental effect and impact on 9 relationships within the centre.</p> <p>10 Our fundamental role is to care for people. A lot 11 of these people have been residing in this country for 12 the vast majority of their lives. Time-served foreign 13 national offenders, they'd come into detention and be 14 subject to a charter flight. They were given 15 a three-month window, but we'd be knocking on their door 16 to advise them they're going this evening. They'd had 17 no opportunity to engage with families, friends, loved 18 ones, et cetera. And when that started happening, 19 I raised my concerns. It continued.</p> <p>20 As part of the Panorama action plan, I engaged with 21 detainees to understand what was frustrating them. They 22 were saying that the relationships within the centre, 23 same as any relationship in life, is based on trust, and 24 when a member of staff is being asked -- detainees could 25 see the demographics in the centre changing</p> <p style="text-align: center;">Page 85</p>	<p>1 three-month window away because people are living day by 2 day, hoping that tomorrow is going to be better than 3 today. When that opportunity is taken away from them 4 and they're then told they are being removed without 5 that wider engagement, we surprise ourselves with how 6 use of force increased? I'm not surprised by that. 7 Because it was a significant contributing factor to the 8 number of uses of force we have observed. So that's why 9 I raised it in that meeting. Forgive the over -- adding 10 too much context.</p> <p>11 Q. You said staff were encouraged to be disingenuous about 12 when --</p> <p>13 A. No, I didn't, I said staff were perceived to be 14 disingenuous. The direction was that staff weren't 15 informed. Only a very small group of staff were advised 16 on the charters because, ultimately, most of the staff 17 there, as I have said to you earlier, care for those in 18 their care. So they would. They would have shared that 19 information. But directions to us was to ensure that it 20 was, you know, it wasn't -- the message wasn't cascaded 21 out to many.</p> <p>22 Q. You say "the message to us", who from?</p> <p>23 A. From the Home Office.</p> <p>24 Q. Why was that message, do you think, told to you?</p> <p>25 A. Because they didn't want the -- nobody wanted the</p> <p style="text-align: center;">Page 87</p>
<p>1 considerably, because you would see the number of 2 charters we were trying to manage on a weekly basis. 3 And so the demographics of the centre were changing 4 significantly.</p> <p>5 Detainees were aware of that, so then they'd see 6 a lot of -- many people of their own nationality 7 arriving into the centre in that particular time leading 8 up to the charter, and they would engage with staff to 9 understand, "Is there a charter going to my country?".</p> <p>10 Staff were encouraged to be disingenuous and be sort 11 of not aware of what the charters were, because staff 12 weren't aware of what the charters were that were 13 occurring.</p> <p>14 As a consequence of that, removals, when the 15 removals occurred, they occurred. But very often, a JR 16 would occur and some detainees obviously were returned 17 back to the centre. You can imagine that relationship 18 back to -- from the detainee's perspective, when you're 19 then engaging with that member of staff who you, from 20 your perception, they have blatantly lied to you, there 21 was a charter going this evening. But that did -- so 22 that was quite damaging in terms of relationships 23 between the staff and the detainees. The consequence of 24 the no-notice charters is that very often people with 25 such short notice to leave the country -- take the</p> <p style="text-align: center;">Page 86</p>	<p>1 charter disrupted.</p> <p>2 Q. Did the Home Office take on board these concerns that 3 you raised?</p> <p>4 A. Are charters, no-notice charters, still live today?</p> <p>5 I don't know. I don't work in the IRC estate. But 6 I should imagine somebody can answer that.</p> <p>7 Q. Did you follow it up with any of the Home Office?</p> <p>8 Paul Gasson was present at that meeting.</p> <p>9 A. I think it is very clear it wasn't only that meeting 10 that I raised it. I raised it in all engagement, and 11 I have said that in my own statement.</p> <p>12 Q. You said in your Verita interview that the Home Office 13 was critical of G4S staff for "showing too much empathy, 14 supporting detainees in their appeals and the likes". 15 What's the basis for that comment?</p> <p>16 A. That comment was based -- it's anecdotal, based on an 17 engagement I had with Ben following a Home Office visit 18 that he'd had.</p> <p>19 There was a point in time, I think it would be about 20 2014, around that period of time, where there was a view 21 from government in relation to: removal centres are 22 removal centres, so all engagement should be about 23 removal. We understand what the removal centre is for, 24 but our role on site isn't about removal. Our role on 25 site is to care for individuals and, as I said, give</p> <p style="text-align: center;">Page 88</p>

<p>1 hope to individuals for tomorrow, to ensure tomorrow is</p> <p>2 a better day than today.</p> <p>3 And as long as there is hope left for that</p> <p>4 individual's cause, people would engage with them and</p> <p>5 support them and signpost them to either some legal</p> <p>6 guidance advice, we created the welfare office,</p> <p>7 et cetera. So the -- but the rhetoric from government</p> <p>8 at the time, and I think we have all seen it around 2014</p> <p>9 time, it was all quite -- the rhetoric was, you know,</p> <p>10 generally all about removals.</p> <p>11 Q. So that was your impression as well, it wasn't just what</p> <p>12 Ben Saunders had discerned from the Home Office? Your</p> <p>13 impression was also that G4S were -- that the</p> <p>14 Home Office thought G4S were too supportive of</p> <p>15 detainees?</p> <p>16 A. I wasn't there at the time. But what I will say is that</p> <p>17 when I did arrive there in 2016, what I experienced was</p> <p>18 staff engaging and caring and giving -- and supporting</p> <p>19 that hope; not leading them to a false hope, but</p> <p>20 supporting that.</p> <p>21 Q. I'm not asking whether G4S staff were, in fact,</p> <p>22 supporting, I'm asking you, was it your impression that</p> <p>23 the Home Office thought G4S were too supportive of</p> <p>24 detainees?</p> <p>25 A. I didn't have that -- it was anecdotal at the time and</p> <p style="text-align: center;">Page 89</p>	<p>1 She says that there's a recent study of prison officers:</p> <p>2 "As a recent study of prison officers points out,</p> <p>3 staff treatment of vulnerable people hinges on their</p> <p>4 view of the purpose of their job. Officers' attitudes</p> <p>5 seem to vary depending on how important they view care</p> <p>6 as an aspect of their job, with officers demonstrating</p> <p>7 more favourable attitudes towards offenders and</p> <p>8 suicide-related behaviour when they see care as their</p> <p>9 primary role."</p> <p>10 She also talks about there being an emphasis on</p> <p>11 security at Brook House rather than care. Do you accept</p> <p>12 that emphasis on security over care?</p> <p>13 A. No. Day to day -- the centre was a secure centre. When</p> <p>14 you walk into Brook House, you'd have said it was</p> <p>15 designed to cat B standards, so it had a secure</p> <p>16 perimeter very similar to what you'd experience within</p> <p>17 a prison environment. There was a focus from part of</p> <p>18 the Home Office in relation to security. We'd had --</p> <p>19 we'd experienced within the IRC estate, over a period of</p> <p>20 time in 2015/16, escapes from what were supposed to be</p> <p>21 the two most secure sites, Colnbrook in Heathrow and</p> <p>22 Brook House, unfortunately under my watch,</p> <p>23 in March 2016. We had an escape from there. So there</p> <p>24 was a lot of focus from the Home Office to ensure that</p> <p>25 we maintained security and we ensured that it was secure</p> <p style="text-align: center;">Page 91</p>
<p>1 I wasn't working there at the time. I'm just relaying</p> <p>2 what was fed back to me.</p> <p>3 Q. When you were working there in 2016, just before the</p> <p>4 relevant period, was that your impression?</p> <p>5 A. I think my comment in relation to the no-notice charters</p> <p>6 answers that. Because the focus was on removal, whereas</p> <p>7 my focus and the majority of the staff's focus was in</p> <p>8 terms of building relationships to have that rapport</p> <p>9 with individuals.</p> <p>10 Q. So is the answer "yes"?</p> <p>11 A. I can't talk -- I can't answer that on behalf of</p> <p>12 the Home Office. I can only answer on personal</p> <p>13 experiences, which I think I've shared.</p> <p>14 Q. The question was about your impression of what the</p> <p>15 Home Office thought about G4S?</p> <p>16 A. Based on what was fed back to me and what I've shared,</p> <p>17 then it's apparent that the wider Home Office, not</p> <p>18 individuals, because a lot of individuals -- the</p> <p>19 majority of individuals in the Home Office on site had</p> <p>20 the same caring approach that -- what we experienced.</p> <p>21 Q. You say the emphasis from the Home Office was on</p> <p>22 removals. Was there also an emphasis on security?</p> <p>23 Because we see from Professor Bosworth's report --</p> <p>24 Professor Bosworth is an expert that's been commissioned</p> <p>25 by this inquiry to look into the culture at Brook House.</p> <p style="text-align: center;">Page 90</p>	<p>1 not to have another escape.</p> <p>2 But, generally -- so that was the infrastructure of</p> <p>3 the building and there was obviously a security</p> <p>4 department to ensure that -- because we know how the</p> <p>5 escapes occurred -- the daily fabric checks took place,</p> <p>6 et cetera, to ensure there were no aids to escape. So</p> <p>7 that's looking at the security from an escape</p> <p>8 perspective. Through another lens, you can look at</p> <p>9 security in terms of relationships, behaviours,</p> <p>10 bullying, et cetera. So, yeah, there was a focus around</p> <p>11 security information reports in terms of relationships</p> <p>12 with people, so there's that monitoring, but again</p> <p>13 within the security department and I would relay that</p> <p>14 information.</p> <p>15 But in terms of your front-line staff who engaged</p> <p>16 every day, when you had two to three people looking</p> <p>17 after 100/120 men, their relationship wasn't about</p> <p>18 security, their relationship was about building</p> <p>19 a rapport with those in their care, and maintaining</p> <p>20 a very good relationship. Because without -- in the</p> <p>21 absence of a good relationship and building that</p> <p>22 rapport, there would be chaos within the centre. I know</p> <p>23 you'll say, chaos in the centre, what we have observed,</p> <p>24 but generally within the centre, it was well ordered,</p> <p>25 people did adhere to the -- generally, the structured</p> <p style="text-align: center;">Page 92</p>

<p>1 regimes that were in place. But that structured regime</p> <p>2 in such an environment will only ever work when there's</p> <p>3 a good relationship between those being detained and</p> <p>4 those caring for those being detained.</p> <p>5 Q. I want to ask you now about the physical environment.</p> <p>6 You have just mentioned that of Brook House. Firstly,</p> <p>7 about the extra beds programme. This is a programme</p> <p>8 that was introduced following a request from the</p> <p>9 Home Office in 2014 to increase the population of</p> <p>10 Brook House, which meant putting in an extra 60 beds and</p> <p>11 converting some of the rooms to three-man rooms. You</p> <p>12 say in your Verita interview that you "got myself</p> <p>13 involved through the process". What was the nature and</p> <p>14 extent of your involvement in that process?</p> <p>15 A. Okay. As you just discussed, the Home Office engaged</p> <p>16 with Ben and Kalpesh(?) – she was the commercial</p> <p>17 finance manager at the time -- to look at increasing the</p> <p>18 bed spaces at Brook House. Brook House, being a modern</p> <p>19 facility -- if I can just add, it wasn't just</p> <p>20 Brook House, it was Tinsley House also, because we</p> <p>21 increased the number of bed spaces at Tinsley at the</p> <p>22 same time, that went through a refurbishment. So there</p> <p>23 was a real focus that the Home Office needed to extend</p> <p>24 their own population. They had been quite dependent</p> <p>25 upon the Prison Service for bed spaces for many years.</p> <p style="text-align: center;">Page 93</p>	<p>1 28 days. With the activity spaces for short-term</p> <p>2 holding, there seemed to be sufficient space there and</p> <p>3 everyone seemed to be comfortable with the increased bed</p> <p>4 spaces, including myself.</p> <p>5 Then negotiations went on for quite a considerable</p> <p>6 period of time with the Home Office about the bed</p> <p>7 spaces --</p> <p>8 Q. Can I just pause there? About the number of spaces, not</p> <p>9 the fact that bed spaces would have to be made</p> <p>10 additionally?</p> <p>11 A. Okay, sorry, even though they'd asked for three beds in</p> <p>12 all rooms initially, our response was three beds on the</p> <p>13 lower-ground floor on three of the units to put an</p> <p>14 additional bed into 20 of the rooms on each of the units</p> <p>15 to increase by -- from 448 to 508 across the whole</p> <p>16 centre.</p> <p>17 Q. Yes.</p> <p>18 A. So negotiations took quite a while because, at the same</p> <p>19 time, we were also submitting our proposal for the</p> <p>20 increased bed spaces at Tinsley House. Tinsley House is</p> <p>21 more dormitory-type effect and some of the rooms there</p> <p>22 were holding, I think, five, up to six, people in an</p> <p>23 individual room.</p> <p>24 What -- on reflection, we can all look back, and</p> <p>25 it's good to look through the lens retrospectively. We</p> <p style="text-align: center;">Page 95</p>
<p>1 Post austerity, et cetera, prisons were closing so</p> <p>2 the bed spaces within the prison environment, which the</p> <p>3 Home Office could make use of, were reducing</p> <p>4 significantly. At the same time, the Home Office were</p> <p>5 also closing Dover, ex-prison, and they'd approached Ben</p> <p>6 to look at putting a third bed. The initial request was</p> <p>7 to put a third bed in all rooms. So that would not be</p> <p>8 increased by 60, that would have been by 180 at the</p> <p>9 time.</p> <p>10 Q. Why didn't that happen?</p> <p>11 A. Because, as an organisation, we -- there wasn't -- the</p> <p>12 centre -- even with the knowledge we had at that time,</p> <p>13 we all knew the centre wouldn't have coped with it at</p> <p>14 that point. So the appropriate risk assessments were</p> <p>15 done. Site reviews, et cetera. And all parties at the</p> <p>16 time in 2014/2015, all believed that the centre could</p> <p>17 cope with the additional 60 detainees.</p> <p>18 Q. What was your specific --</p> <p>19 A. If I can, I'll answer that if I can. At the time, as</p> <p>20 I say, in 2013/14, there were 5 per cent of time-served</p> <p>21 foreign national offenders. Therefore, a lot of people</p> <p>22 coming into the centre on short-term detention. The</p> <p>23 average stay was 28 days. But generally they were one,</p> <p>24 two, three, four days. There were a couple of long</p> <p>25 stays but, generally, the average population was</p> <p style="text-align: center;">Page 94</p>	<p>1 can see there was a -- I will describe it as a bit of</p> <p>2 a Venn diagram in some respects, where, as we were</p> <p>3 increasing the population, at the same time, the spice</p> <p>4 issues were occurring. At the same time, the prison</p> <p>5 population in the establishments, because prisons had</p> <p>6 themselves been subject to a number of disturbances.</p> <p>7 Bed spaces were becoming quite tight within the prison</p> <p>8 environment, and a lot of the guys who previously may</p> <p>9 have been held in the prison environment under IS 91 and</p> <p>10 would have stayed within the prison environment until</p> <p>11 much closer to their release date were now finding their</p> <p>12 way into the IRC estate. As a consequence of that, we</p> <p>13 were now looking after some guys with some long periods</p> <p>14 of time, quite a number of them, you know, over two</p> <p>15 years, quite a number over 18 months and quite a few</p> <p>16 over 12 months. As I said to Kate and Ed in my Verita</p> <p>17 interview, the regime opportunities for people in</p> <p>18 long-term detention isn't what an IRC and immigration</p> <p>19 centre was designed for.</p> <p>20 Q. So there are lots of consequences to the -- through the</p> <p>21 new regime of the three beds in a cell. You have</p> <p>22 mentioned there the pressure --</p> <p>23 A. Not just the three beds in a cell. The length of</p> <p>24 detention. Even when you take away the third bed, now,</p> <p>25 with hindsight, you can look at it, the length of</p> <p style="text-align: center;">Page 96</p>



<p>1 detention, it was quite a restrictive regime compared to</p> <p>2 a prison regime. So even though we are giving prisoners</p> <p>3 a lot more freedom -- sorry, detainees compared to</p> <p>4 prisoners a lot more freedom within the environment, and</p> <p>5 they have come -- as I said, 55 per cent have come from</p> <p>6 a prison environment. They have got the freedom of</p> <p>7 movement within the centre which they may not have</p> <p>8 within a prison environment, albeit they didn't have</p> <p>9 sufficient activity, which a prison environment can</p> <p>10 provide them. Because our gym facility, for example,</p> <p>11 was a hotel-type gym. There was no sports hall. Yes,</p> <p>12 there were courtyards to have a game of three-, four-,</p> <p>13 five-a-side football, but it wasn't the structure and</p> <p>14 regime that is offered within a prison environment.</p> <p>15 Does that make sense?</p> <p>16 Q. Yes. So the activities were insufficient for the number</p> <p>17 of people that you had?</p> <p>18 A. The activities were insufficient for the duration of</p> <p>19 stay. I don't think the activities were insufficient</p> <p>20 for the numbers, because if the numbers had been short</p> <p>21 term, it would have been enough to keep you interested</p> <p>22 and occupied. But for the length of stay, it's where</p> <p>23 the real rub came.</p> <p>24 Q. But presumably, that was put -- there was more pressure</p> <p>25 on those activities with the increase of 60 beds in</p> <p style="text-align: center;">Page 97</p>	<p>1 concern.</p> <p>2 Q. So when did you voice those concerns?</p> <p>3 A. When I experienced it, in 2017.</p> <p>4 Q. You didn't think that, before that, that might have been</p> <p>5 an issue?</p> <p>6 A. No, I didn't. But, as I said, when I first engaged, it</p> <p>7 was through -- the initial analysis of it, there was</p> <p>8 sufficient churn to enable the regime to provide</p> <p>9 a decent service.</p> <p>10 Q. You don't think those problems with activities, other</p> <p>11 pressures on healthcare and so on, would have been</p> <p>12 foreseeable?</p> <p>13 A. I think with continually short-term detention, it would</p> <p>14 still cope. It was the length of stay and the general</p> <p>15 frustration that caused the concern. When we look at</p> <p>16 the -- where healthcare got stretched, there was</p> <p>17 sufficient resource in healthcare to deal with --</p> <p>18 because we had -- there were sufficient detailed risk</p> <p>19 assessments between us, the Home Office and the</p> <p>20 Ministry of Justice Estates Department, because that's</p> <p>21 who were the advisors to the Home Office at the time.</p> <p>22 We'd engaged at all levels. So this wasn't a G4S in</p> <p>23 isolation decision, it wasn't the Home Office in</p> <p>24 isolation and it wasn't MOJ Estates directed. It was</p> <p>25 a tripartite engagement to understand could the centre</p> <p style="text-align: center;">Page 99</p>
<p>1 2016? There's more pressure on the activities with more</p> <p>2 people, surely?</p> <p>3 A. There's more pressure on activities but it was</p> <p>4 sufficient activities -- there was sufficient activity</p> <p>5 space; it was just the variety of activity was limited.</p> <p>6 Q. You said in your Verita interview, your second Verita</p> <p>7 interview, that there was not sufficient activity space</p> <p>8 in Brook House for 448 detained persons, let alone 508.</p> <p>9 A. Because we couldn't -- we didn't have -- that isn't</p> <p>10 space as in, forgive my term, bums on seats. That was</p> <p>11 space in looking at alternative activities to keep the</p> <p>12 men interested in --</p> <p>13 Q. So you weren't talking there about physical space, you</p> <p>14 were talking about --</p> <p>15 A. Yes, physical space, in terms of us being able to offer</p> <p>16 something else, something beyond just the cultural</p> <p>17 kitchen or just the classroom or something within</p> <p>18 a prison environment -- we talk about different</p> <p>19 workshops, different activities, et cetera. If I give</p> <p>20 an example, there was no sports -- I think I've already</p> <p>21 shared this example. There was no sports hall there.</p> <p>22 The religious services area, whereas we often make use</p> <p>23 of that, within a prison environment, beyond just</p> <p>24 worship, it was a very small area. So it was the</p> <p>25 capacity to offer more, I think is what was causing me</p> <p style="text-align: center;">Page 98</p>	<p>1 cope with, but we were basing it on, unfortunately, data</p> <p>2 that preceded what actually occurred and that data would</p> <p>3 have meant the short-term detention would have been</p> <p>4 served sufficiently, I think, even at 508, but as soon</p> <p>5 as we seen people staying there for extended periods of</p> <p>6 time, it became an issue.</p> <p>7 Where I was going with the -- in relation to the</p> <p>8 healthcare being stretched around the same period of</p> <p>9 time, as I alluded to earlier, there was</p> <p>10 a considerable -- we all know it -- the spice endemic</p> <p>11 and the increased time-served foreign national offenders</p> <p>12 coming into the centre and bringing prison-learned</p> <p>13 behaviours and, unfortunately, what had occurred around</p> <p>14 the spice -- the NPS, as it was known at the time, that</p> <p>15 was finding its way into the IRC estate and particularly</p> <p>16 into Brook House. As a consequence of that, then</p> <p>17 healthcare were responding to these emergency calls, of</p> <p>18 course, because men were in a very poor state as</p> <p>19 a consequence of taking this.</p> <p>20 So at the same time, go back to my bit of a Venn</p> <p>21 diagram with a bit of a red dot in the middle, all of</p> <p>22 these issues were happening at the same time and the</p> <p>23 hotspot at that particular time, we have all had sight</p> <p>24 of it.</p> <p>25 Q. But the additional beds weren't just an issue, surely,</p> <p style="text-align: center;">Page 100</p>

<p>1 because of the length of stay or the spice epidemic. If</p> <p>2 there are more people within a short-term holding</p> <p>3 facility than there were before, a significant increase,</p> <p>4 that's likely to have had an effect on detainees'</p> <p>5 welfare, isn't it? The fact there would be three people</p> <p>6 in a cell, there would be less privacy, smells, noise.</p> <p>7 All of those issues are likely to become a problem,</p> <p>8 aren't they?</p> <p>9 <b>A. It's apparent they have become, but when the initial</b></p> <p>10 <b>risk assessments were done and the analysis was -- the</b></p> <p>11 <b>cells were much bigger than other custodial -- sorry,</b></p> <p>12 <b>the rooms were much bigger than the custodial cells and</b></p> <p>13 <b>the -- the guidance given to us, as operators, was there</b></p> <p>14 <b>was sufficient space. Because, when they compared that</b></p> <p>15 <b>to other custodial facilities where they had put a third</b></p> <p>16 <b>person in, these rooms were even larger than that. But</b></p> <p>17 <b>I think we all take on board from -- we know that</b></p> <p>18 <b>Stephen Shaw made his recommendation, and Ian Castle,</b></p> <p>19 <b>who sat here this morning, he then advised me that the</b></p> <p>20 <b>third bed was no longer to be used. I think, with the</b></p> <p>21 <b>benefit of hindsight, I think we -- we understand why</b></p> <p>22 <b>that decision was made.</b></p> <p>23 <b>Q. It didn't need hindsight, did it, because HMIP, in their</b></p> <p>24 <b>inspection report -- no need to bring it up on screen --</b></p> <p>25 <b>&lt;VER000117&gt;, page 4 -- said the extra beds would lead to</b></p> <p style="text-align: center;">Page 101</p>	<p>1 <b>opportunity is the Home Office are our customer and we</b></p> <p>2 <b>are here to serve our customer. The landlord of</b></p> <p>3 <b>the facility was the Home Office. They wanted to</b></p> <p>4 <b>increase the bed spaces. They needed to increase the</b></p> <p>5 <b>bed spaces across the wider IRC estate. We engaged with</b></p> <p>6 <b>Tinsley and, no, we are not having the engagement about</b></p> <p>7 <b>Tinsley where we put five people in a room at Tinsley,</b></p> <p>8 <b>I think, one might even be six, but the Home Office</b></p> <p>9 <b>wanted to increase -- needed to increase the bed space</b></p> <p>10 <b>and they came to us, as one of their suppliers, to</b></p> <p>11 <b>engage if we would extend the opportunity for them at</b></p> <p>12 <b>Brook House.</b></p> <p>13 <b>Q. I assume, with an increase in opportunity, there was an</b></p> <p>14 <b>increase in profits to be made?</b></p> <p>15 <b>A. I'll answer that in a slightly different way. There was</b></p> <p>16 <b>a reduction in cost to the Home Office because there was</b></p> <p>17 <b>a blended rate. So the cost per detainee placed per day</b></p> <p>18 <b>actually is a full blended rate reduced. So, as</b></p> <p>19 <b>a taxpayer, we see the benefits of that in terms of</b></p> <p>20 <b>a reduced rate.</b></p> <p>21 <b>Q. But in terms of G4S, that meant you had --</b></p> <p>22 <b>A. Of course, if you increase revenue, of course you</b></p> <p>23 <b>increase profit. That's the commercial world.</b></p> <p>24 <b>Q. I want to ask you now a bit about the bid process. At</b></p> <p>25 <b>paragraph 2 of your witness statement, and this is</b></p> <p style="text-align: center;">Page 103</p>
<p>1 a decline in living standards?</p> <p>2 <b>A. Peter Clarke did say that in his executive summary. He</b></p> <p>3 <b>didn't take to putting that into a recommendation but,</b></p> <p>4 <b>ultimately, even though I've lived with the experience</b></p> <p>5 <b>of it, all I can suggest is, it was a decision. This</b></p> <p>6 <b>isn't saying this was the decision by the Home Office</b></p> <p>7 <b>because, as I said, we were all party to the decision.</b></p> <p>8 <b>It was, from a G4S perspective, we responded to the</b></p> <p>9 <b>request from the Home Office. We provided the solution.</b></p> <p>10 <b>We engaged with -- as I said, with the necessary</b></p> <p>11 <b>agencies. I understand, as I said, from the MOJ Estates</b></p> <p>12 <b>Department, where sufficient risk assessments were</b></p> <p>13 <b>conducted in terms of ventilation, et cetera, and</b></p> <p>14 <b>a third bed was brought in.</b></p> <p>15 <b>So I can advise you on what the journey is. I think</b></p> <p>16 <b>we have all accepted on what the review is, on what was</b></p> <p>17 <b>conducted and what Stephen Shaw's recommendation was and</b></p> <p>18 <b>advise you at the moment, as I'm aware, the third bed</b></p> <p>19 <b>has now been removed and is no longer in use.</b></p> <p>20 <b>Q. You said in your witness statement there was no</b></p> <p>21 <b>resistance to the programme, the third bed programme,</b></p> <p>22 <b>from a G4S perspective, and that was because it was</b></p> <p>23 <b>a commercial opportunity for G4S?</b></p> <p>24 <b>A. A commercial opportunity isn't -- don't make the</b></p> <p>25 <b>assumption that's a financial opportunity. Commercial</b></p> <p style="text-align: center;">Page 102</p>	<p>1 something we have been through before, you were the</p> <p>2 business development and mobilisation transition</p> <p>3 transformation director between 2011 and 2014, and that</p> <p>4 involved operational contracts following successful</p> <p>5 bids. Then 2014 to 2016, you were development director.</p> <p>6 Were you involved in the bidding process in June 2014?</p> <p>7 <b>A. Yes, I would have been. I'm trying to recall. So my</b></p> <p>8 <b>involvement in all bids for custodial facilities was as</b></p> <p>9 <b>the operational lead.</b></p> <p>10 <b>Q. You will be aware, then, that at the time the bid -- of</b></p> <p>11 <b>the bid process at that time in 2014, that Brook House</b></p> <p>12 <b>was designed to be a 72-hour centre, wasn't it?</b></p> <p>13 <b>A. Yes, but that was 2008, was when the Brook House main</b></p> <p>14 <b>bid was -- for it to be a 72-hour centre. By the time</b></p> <p>15 <b>you get to 2014, I'm trying to -- why I'm looking a bit</b></p> <p>16 <b>glazed there, is the bid process in 2014 you're alluding</b></p> <p>17 <b>to.</b></p> <p>18 <b>Q. If we can perhaps go to the bid process in 2007 --</b></p> <p>19 <b>sorry, the commercial evaluation in 2007. If we can</b></p> <p>20 <b>please bring up &lt;DL0000140&gt;, page 40, please. You will</b></p> <p>21 <b>see there this is a Home Office slide from Brook House</b></p> <p>22 <b>operating contract commercial evaluation from</b></p> <p>23 <b>7 December 2007. If we can go to page 7, please -- 47,</b></p> <p>24 <b>rather. We see at the top of the slide there about</b></p> <p>25 <b>pricing:</b></p> <p style="text-align: center;">Page 104</p>

<p>1 "The Brook House tender has delivered significant</p> <p>2 (35 per cent) cost savings compared to the original</p> <p>3 budget and is below the current average cost per bed</p> <p>4 when compared to the like of 2009 projections."</p> <p>5 Were you bid manager at G4S at the time?</p> <p>6 <b>A. I was for G4S, and I remember this coming out because,</b></p> <p>7 <b>unfortunately, we, as G4S, didn't win the bid. So</b></p> <p>8 <b>I remember it was GSL who won the bid, but at the time</b></p> <p>9 <b>I was representing G4S. So one of our competitors at</b></p> <p>10 <b>the time was successful in this bid.</b></p> <p>11 Q. I want to move now to use of force, and in particular</p> <p>12 MPR. You stated in your witness statement at</p> <p>13 paragraph 108 that MPR was not related to Brook House,</p> <p>14 as it was a restraint method for minors. We have heard</p> <p>15 from John Connolly, who was a C&amp;R instructor, that at</p> <p>16 the time MPR was the main restraint model which</p> <p>17 officers used and were trained in, in 2017. This</p> <p>18 contrasts to a lot of other evidence which says that it</p> <p>19 was not. Are you able to provide an explanation for</p> <p>20 that? Was --</p> <p>21 <b>A. I can't explain what John Connolly said. What I do know</b></p> <p>22 <b>is what John Connolly said is wrong. MPR is to be used</b></p> <p>23 <b>on under 18s --</b></p> <p>24 Q. Was it used at Brook House --</p> <p>25 <b>A. -- and not used at Brook House. It was used at</b></p> <p style="text-align: center;">Page 105</p>	<p>1 <b>the use of force coordinators.</b></p> <p>2 <b>So what I was engaging in, at that point, was to</b></p> <p>3 <b>ensure that the meeting will take place on a regular</b></p> <p>4 <b>occurrence with the continuity of the correct people</b></p> <p>5 <b>being present. So we could then share the learning</b></p> <p>6 <b>from -- the lessons learned from the reviews to pass on</b></p> <p>7 <b>to the trainers through the use of force coordinator to</b></p> <p>8 <b>develop the staff conducting --</b></p> <p>9 Q. Did that, in fact, happen on your watch after 2016?</p> <p>10 <b>A. It improved, and I think you will see that HMIP in their</b></p> <p>11 <b>2016 report published in January '17, they said use of</b></p> <p>12 <b>force governance was good.</b></p> <p>13 Q. You said in paragraph 105 of your witness statement that</p> <p>14 there were improvements made, albeit it was apparent</p> <p>15 that this was not sustained. That suggests that you --</p> <p>16 <b>A. That suggests what I've just described, where the HMIP</b></p> <p>17 <b>accepted it as being good governance in place. When</b></p> <p>18 <b>I returned there in '17 -- and I'm not offering any</b></p> <p>19 <b>mitigation, I can understand how it did fall away,</b></p> <p>20 <b>because the use of force coordinator, who was -- who was</b></p> <p>21 <b>driving a lot of that, had left the business.</b></p> <p>22 <b>Steve Skitt, to his credit, had introduced scrutiny</b></p> <p>23 <b>meetings, but they weren't to the level -- this isn't</b></p> <p>24 <b>being critical of those who attended the scrutiny</b></p> <p>25 <b>meetings, but we did need a use of force coordinator.</b></p> <p style="text-align: center;">Page 107</p>
<p>1 <b>Tinsley House because, at Tinsley House, we had</b></p> <p>2 <b>predeparture accommodation looking after minors.</b></p> <p>3 Q. Thank you. I want to now ask you about another meeting</p> <p>4 that you had, on 30 March 2016, and we have already</p> <p>5 alluded to. You said governance needs to be tightened</p> <p>6 in relation to use of force meetings, and you say that</p> <p>7 there needed to be a consistent approach to use of force</p> <p>8 meeting, with regular times, consistent agendas, to</p> <p>9 ensure the functional head instructors were available.</p> <p>10 Who had attended these meetings in 2006 before any</p> <p>11 changes were made?</p> <p>12 <b>A. Again, when I went there in February '16, by the time</b></p> <p>13 <b>I'd sort of met with Michelle and others to understand</b></p> <p>14 <b>the structure, part of mine was to understand how</b></p> <p>15 <b>critical errors such as use of force, et cetera, were</b></p> <p>16 <b>being managed. So I looked at previous meeting notes,</b></p> <p>17 <b>et cetera. There seemed to be inconsistency -- again,</b></p> <p>18 <b>in relation to what I did with the detainee meetings --</b></p> <p>19 <b>inconsistent attendees. And we never get real learning</b></p> <p>20 <b>when you don't have continuity. So -- and I knew I'd</b></p> <p>21 <b>already thought of introducing the head of safeguarding,</b></p> <p>22 <b>but I wanted the continuity -- I think at the time it</b></p> <p>23 <b>was Neil Davies -- to chair the use of force meetings.</b></p> <p>24 <b>But senior managers aren't the subject matter experts in</b></p> <p>25 <b>some areas, and particularly they need to make use of</b></p> <p style="text-align: center;">Page 106</p>	<p>1 <b>By the time I arrived there in September '17, the use of</b></p> <p>2 <b>force coordinators that had been in place, not only had</b></p> <p>3 <b>the -- the one prior had resigned and left, we then</b></p> <p>4 <b>dismissed some during the -- post Panorama.</b></p> <p>5 Q. That was John Connolly. He was use of force</p> <p>6 coordinator. Who replaced him, then, after that?</p> <p>7 <b>A. I think you will lead on to this in a few moments.</b></p> <p>8 <b>I had to reach out to other parts of our custodial</b></p> <p>9 <b>business and I had support from a team from Parc Prison.</b></p> <p>10 Q. We heard from Dave Webb during this inquiry that the</p> <p>11 meetings -- I say "meetings" in inverted commas -- that</p> <p>12 took place of use of force review meetings were simply</p> <p>13 him looking through the footage and doing what he</p> <p>14 described and was obvious as a tick-box exercise,</p> <p>15 looking at the videos and seeing if there were any</p> <p>16 lessons learned. Are you talking about an extra layer</p> <p>17 of scrutiny above this or are you talking about --</p> <p>18 <b>A. We introduced three layers of scrutiny. I understand,</b></p> <p>19 <b>I had similar concerns about Dave as well because he was</b></p> <p>20 <b>inexperienced in that role, because we had lost the --</b></p> <p>21 Q. Just pause there. It is not a criticism of necessarily</p> <p>22 him being in the role --</p> <p>23 <b>A. No, it is the process --</b></p> <p>24 Q. -- it is the meeting itself.</p> <p>25 <b>A. It is the process. I understand that. Post Panorama,</b></p> <p style="text-align: center;">Page 108</p>

1 when I arrived there, even though we'd introduced  
2 body-worn cameras in 2016-ish, that was generally for  
3 managers, et cetera, a critical priority for me was to  
4 introduce body-worn cameras across the centre, so  
5 by December '17 we'd introduced the body-worn cameras  
6 for all staff. And what -- the reassurance I wanted  
7 from the duty directors on site were that when a use of  
8 force occurred, because we know we didn't have the skill  
9 set in relation to the use of force coordinator at this  
10 point. When a use of force occurred, we -- it was for  
11 the duty director to review all use of force through the  
12 body-worn camera to ensure the initial engagement on  
13 a spontaneous incident, for example, had been to  
14 de-escalate, to engage, et cetera, and it had to be  
15 justified. So that was the first element of it.

16 So the three layers was the Oscar 1 on site would  
17 respond, would ensure all the information was collated,  
18 all use of force reports completed. The second line of  
19 defence was obviously the duty director doing the  
20 review, to look at -- to ensure it was justified use of  
21 force. And the third layer of defence, even though they  
22 used Dave Webb -- because the duty director wasn't  
23 a subject matter expert, but they'd understand it had to  
24 be de-escalated. Dave's role was introduced not as use  
25 of force coordinator, to ensure he could look through

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1 his lens -- so I can understand why it is called a tick  
2 box from his perspective. It was to ensure the correct  
3 techniques and the like, from his perspective, were  
4 done. And then we introduced -- so that was the three  
5 layers -- lines of defence, in some respects, and then  
6 the scrutiny meeting would review it in terms of getting  
7 the wider lessons learned.

8 Q. Those three layers were in place at Brook House at the  
9 time in the relevant period, 2017?

10 A. No, I can't talk about the relevant period. What I'm --

11 Q. You were there in September 2017. Were they there then?

12 A. Well, it wasn't there in time, because the body-worn  
13 camera coverage by the duty director, I introduced the  
14 duty director checks post Panorama. The governance in  
15 my time in 2016, as you will see from the HMIP report  
16 in -- from October/November 2016, cites that the use of  
17 force governance was good.

18 Q. Right. But the three layers of protection or scrutiny,  
19 rather, in September 2017 when you were there, the only  
20 layer of scrutiny in fact was there, was the Dave Webb  
21 tick box --

22 A. No, I don't know what occurred at that time, because  
23 I should imagine during the relevant period that was  
24 prior to the dismissal of your John Connollys,  
25 et cetera, et cetera. So I'm assuming the use of force

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1 committee was taking place. But I understand that Steve  
2 had introduced the scrutiny meeting at that point  
3 because I think there was some inconsistent attendees.  
4 We had lost Dave Eldridge who had been the use of force  
5 coordinator --

6 Q. The scrutiny meeting, that was above that, that was  
7 a fourth --

8 A. No, I introduced that later as the fourth. But Steve  
9 had put that in initially as the use of force meeting.  
10 Steve responded following the departure of  
11 Dave Eldridge.

12 Q. I want to ask you now about the reaction to Panorama.  
13 Did you watch it live?

14 A. I did.

15 Q. How do you explain what you saw there?

16 A. I can't. I haven't got words for it. It was shocking.  
17 I think I shared with you earlier I had to reflect on  
18 that immediately afterwards. You'll always look at  
19 yourself in the mirror to understand, these were  
20 people -- I didn't know many of them -- who actually we  
21 had seen on the observations, but it was a completely  
22 different centre to what I'd experienced when I was  
23 there in 2016. So your first port of call is always to  
24 look at yourself.

25 Q. And did you -- so you looked at yourself for some

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1 introspection. Was there some --

2 A. To understand what I'd missed, had I missed anything.

3 I did take some solace in the fact of, when you do look,  
4 were these behaviours happening on my watch? Of course  
5 you're going to check yourself on that because,  
6 ultimately, you -- I know why I joined this sector many  
7 years ago, is to care for people. That wasn't caring  
8 for people.

9 Q. Did you have a view of how it could have happened?

10 A. No. I've got a retrospective view on it, as we speak.

11 But I was disappointed. You will see this in my  
12 statement, forgive me. We are employed by a private  
13 company but we are public servants and when we train our  
14 staff to be custodial officers, whether that's from  
15 a prison perspective, prison custodial officers, or in  
16 the detention centres, the detention custody officers,  
17 they all have a responsibility to us as members of  
18 the state, and that is they are trained to report on any  
19 wrongdoing. And watching that -- and I'm not going to  
20 call it -- I can't call it a use of force. Watching  
21 that assault in the cell, I think you can sense now my  
22 stomach is still dropped here. It was horrendous. And  
23 not one of them had the even own personal responsibility  
24 to submit that report. I really -- yeah, I've got no  
25 answers for it, other than to say, we know what the

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28 (Pages 109 to 112)

<p>1 staff are trained in. We know what -- they know what</p> <p>2 their responsibilities are. But it wasn't reported.</p> <p>3 Q. There was some serious thinking after that Panorama,</p> <p>4 obviously?</p> <p>5 A. Absolutely.</p> <p>6 Q. And which included working with UCL and the Jill Dando</p> <p>7 Institute for Security with Nick Ross and</p> <p>8 Professor Richard Wortley. So there were some answers</p> <p>9 that were offered there and it was in particular about</p> <p>10 culture. I won't bring it on screen because we don't</p> <p>11 have time, but you spoke about in your Verita interview,</p> <p>12 in your first Verita interview, &lt;VER000266&gt;, page 20, at</p> <p>13 266, you talk about the period of November 2017, and you</p> <p>14 were talking about the context of why people didn't call</p> <p>15 out behaviour and you refer particularly to the</p> <p>16 John Connolly incident, that, "It's just something I was</p> <p>17 discussing with the Jill Dando Institute last week about</p> <p>18 general behaviours. We were looking at the</p> <p>19 Milgram Experiment and the likes and how people can be</p> <p>20 pushed into the direction of behaviours."</p> <p>21 There's also a G4S action plan, &lt;CJS0073911&gt;, at</p> <p>22 page 10, where there is also a reference to Milgram, and</p> <p>23 for everyone that doesn't know, it was a 1960s</p> <p>24 experiment in the social psychology field which was</p> <p>25 about people being led to abuse by those who instruct</p> <p style="text-align: center;">Page 113</p>	<p>1 understand how people behave in that way in an</p> <p>2 environment that, when you walk around, you didn't</p> <p>3 observe it.</p> <p>4 I think what I was pleased about -- and then I had</p> <p>5 to test, was I being naive when I was walking around?</p> <p>6 Hence why I invited Nick Ross and Professor</p> <p>7 Richard Wortley on site, and many other stakeholders, we</p> <p>8 engaged with the Immigration Minister at the time,</p> <p>9 Caroline Nokes, Andrew Mitchell, the MP, wanted to have</p> <p>10 a walk around. And I had a completely open-door policy.</p> <p>11 I wanted people to look at it through a different lens.</p> <p>12 So, was I being naive? Because I was most certainly</p> <p>13 judging myself when I observed Panorama.</p> <p>14 What became apparent was that there were -- them</p> <p>15 behaviours were most certainly conducted by a minority</p> <p>16 of people, that the staff on site were as embarrassed</p> <p>17 and as angry as I was, which, actually, I was pleased</p> <p>18 about. And we did take that learning and did share</p> <p>19 that -- each of the experiments that we just discussed,</p> <p>20 and my consideration, initially, was to put them onto</p> <p>21 the initial training course and put all staff through</p> <p>22 a refresher course on that. But we did have some wider</p> <p>23 considerations of, is that really undermining the staff,</p> <p>24 and those the majority who actually do go to work every</p> <p>25 day to ensure tomorrow is better than today for others?</p> <p style="text-align: center;">Page 115</p>
<p>1 them, and there were people who were administering</p> <p>2 potentially fatal shocks to people in their care and</p> <p>3 those people were called learners.</p> <p>4 The G4S action plan specifically mentions the</p> <p>5 Milgram Experiments. That is -- and you have also</p> <p>6 mentioned in your Verita interview about a well-known</p> <p>7 Stanford Prison experiment which had similar effects.</p> <p>8 You also mention Abu Ghraib as well, not by name but you</p> <p>9 talk about what had come out of Iraq and the abuse of</p> <p>10 servicemen in Iraq there.</p> <p>11 It was obviously being taken very seriously, as</p> <p>12 seriously as that, to mention those two experiments, and</p> <p>13 it appears to have been accepted by you that it was</p> <p>14 a cultural problem. Is that right?</p> <p>15 A. What was taken by me and the three examples we gave:</p> <p>16 Stanford, Milgram, Abu Ghraib, is the issues that</p> <p>17 I raised, and I've used all three of them in</p> <p>18 presentations to numerous stakeholders, because I had to</p> <p>19 question myself, was it -- was it cultural, was it</p> <p>20 widespread within the centre? Because, having observed</p> <p>21 it, you need to test how wide that is. Hence us</p> <p>22 engaging with UCL, the Jill Dando Institute, and</p> <p>23 Nick Ross and Professor Richard Wortley, is to try and</p> <p>24 get some learning. On that journey I raised them as</p> <p>25 based on my own awareness and experiences, et cetera, to</p> <p style="text-align: center;">Page 114</p>	<p>1 So it gave us an opportunity to reflect, as an</p> <p>2 organisation, where we were going with it, and I think</p> <p>3 you will have had sight of Professor Richard --</p> <p>4 Professor Richard Wardley and Nick Ross's visit based on</p> <p>5 we were going in the right direction.</p> <p>6 Q. That's right. We have got the notes of the meetings,</p> <p>7 the emails. Again, I won't bring them up because of</p> <p>8 time purposes, but &lt;CJS0073865&gt; and pages 1 to 4.</p> <p>9 Nick Ross wrote to you summarising what he thought were</p> <p>10 the cultural and problematic issues at Brook House, and</p> <p>11 he said you were charged with detaining people in</p> <p>12 high-security conditions and you have the overriding</p> <p>13 need to acknowledge some of those detained may prove the</p> <p>14 right to remain in the UK like any other citizen. He</p> <p>15 says it is heightened by the fact that some detainees</p> <p>16 face frightening, disheartening, life-changing</p> <p>17 deportation, which can lead to depression, self-harm,</p> <p>18 risk of suicide, and so on. There is a need for</p> <p>19 considerable sensitivity. He then proposes suggested</p> <p>20 relatively minor changes, so about recruitment being</p> <p>21 recruitment, being -- campaigns being crystal clear as</p> <p>22 to what candidates will face, if appointed, because</p> <p>23 there was mismatch between the expectation and what, in</p> <p>24 fact, was the reality; sanctions for --</p> <p>25 A. A mismatch between what he was saying was government</p> <p style="text-align: center;">Page 116</p>

<p>1 rhetoric of it and what the Home Office actually needed</p> <p>2 to deliver.</p> <p>3 Q. But also about what they were --</p> <p>4 <b>A. I was just adding context to that because I had these</b></p> <p>5 <b>conversations with him. But there was a message from</b></p> <p>6 <b>government and the reality of what we were trying to</b></p> <p>7 <b>deliver on site.</b></p> <p>8 Q. Sure. But part of the induction process that was --</p> <p>9 which they were suggesting should be introduced, should</p> <p>10 be to spell out the difficulties in what -- the</p> <p>11 realities that DCOs would have to face?</p> <p>12 <b>A. Absolutely, yes.</b></p> <p>13 Q. Sanctions for bad behaviour, having personal officers,</p> <p>14 for instance, having what he called 360-degree</p> <p>15 assessments with staff, talked about changing the</p> <p>16 physical appearance of Brook House, including more</p> <p>17 artwork and so on, more sound-absorbent materials in</p> <p>18 particular, and ways of reducing violence, and in</p> <p>19 particular he talked about a three-way dynamic of</p> <p>20 violence, about aggression between detained persons,</p> <p>21 aggression against staff and then the aggression from</p> <p>22 staff to detained persons. This was all offered</p> <p>23 pro bono at the start, I understand, with the Jill Dando</p> <p>24 Institute?</p> <p>25 <b>A. It was, yes.</b></p> <p style="text-align: center;">Page 117</p>	<p>1 <b>A. I think I've just explained it: because even though it</b></p> <p>2 <b>was something that I was passionate about, the -- my</b></p> <p>3 <b>line management wanted to ensure that the new director</b></p> <p>4 <b>had -- it would be their choice in terms of what</b></p> <p>5 <b>relationships with third party providers that they would</b></p> <p>6 <b>have going forward.</b></p> <p>7 Q. Do you know what the new director -- why the new</p> <p>8 director didn't take this up?</p> <p>9 <b>A. A lot of the changes that we are discussing here were</b></p> <p>10 <b>implemented, as a consequence of some of the support and</b></p> <p>11 <b>guidance provided by Nick and Professor Richard Wortley,</b></p> <p>12 <b>were included. As a consequence of that, the</b></p> <p>13 <b>improvements at Brook House were recognised then by the</b></p> <p>14 <b>Home Office and I think, as you're aware, we then</b></p> <p>15 <b>negotiated a two-year extension of the contract. That</b></p> <p>16 <b>two-year extension included a number of them</b></p> <p>17 <b>recommendations, not all, but the competing priority</b></p> <p>18 <b>against having another action plan, and this is the</b></p> <p>19 <b>discussion I had within my own organisation, another</b></p> <p>20 <b>competing action plan when we also -- we still hadn't</b></p> <p>21 <b>had signed off, and we still haven't had signed off, the</b></p> <p>22 <b>Brook House action plan. I'd submitted numerous</b></p> <p>23 <b>occasions but I would imagine, until this inquiry is</b></p> <p>24 <b>completed, it wouldn't ever get signed off. But we</b></p> <p>25 <b>submitted that in May '18 as a draft closure action</b></p> <p style="text-align: center;">Page 119</p>
<p>1 Q. Because there was a suggestion that a commercial</p> <p>2 contract should be entered into if it was to continue.</p> <p>3 We can't see what happened after May 2018. What, if</p> <p>4 anything, of those recommendations were taken forward?</p> <p>5 <b>A. A lot of the recommendations were already in train.</b></p> <p>6 <b>I think, as we describe on that. We didn't have</b></p> <p>7 <b>a specific action plan towards it. It was something</b></p> <p>8 <b>that I wanted to continue to engage with, and I'm saying</b></p> <p>9 <b>that personally. At that point in time, we'd just</b></p> <p>10 <b>appointed for a full-time director on site. I think, as</b></p> <p>11 <b>you're aware, I was only initially supposed to go there</b></p> <p>12 <b>for six months. The Home Office wouldn't allow us to</b></p> <p>13 <b>advertise for another director at that time. So my</b></p> <p>14 <b>period of duty there was extended. We engaged -- at the</b></p> <p>15 <b>time in May, we did -- we then had approval to</b></p> <p>16 <b>advertise.</b></p> <p>17 <b>My engagement with Nick and Richard was to continue.</b></p> <p>18 <b>The decision was made not to continue at that point,</b></p> <p>19 <b>until the new director arrived, to ensure they were</b></p> <p>20 <b>going to do the same outcomes, in terms of relationships</b></p> <p>21 <b>with the third party provider, that I did.</b></p> <p>22 Q. What happened with the Jill Dando Institute? Was it</p> <p>23 taken forward?</p> <p>24 <b>A. It wasn't taken forward, no.</b></p> <p>25 Q. Why was that?</p> <p style="text-align: center;">Page 118</p>	<p>1 <b>plan. A lot of the recommendations that I put into</b></p> <p>2 <b>there were then accepted by the Home Office as part of</b></p> <p>3 <b>the contract extension and were then embraced by the</b></p> <p>4 <b>Home Office for their recompet at Brook House, which</b></p> <p>5 <b>was -- because we'd influenced then, based on our own</b></p> <p>6 <b>learning, based on some guidance from stakeholders such</b></p> <p>7 <b>as Nick and the UCL --</b></p> <p>8 Q. I'm just going to interrupt you there for time.</p> <p>9 <b>A. But that did -- what I was going to say, that influenced</b></p> <p>10 <b>the contract that Serco are now managing on site.</b></p> <p>11 <b>Because we suggested what that baseline staffing level,</b></p> <p>12 <b>et cetera, should look like.</b></p> <p>13 Q. So which of those points were taken forward, then? You</p> <p>14 said that there were some of those points that were</p> <p>15 already being taken forward and that they did, in fact,</p> <p>16 take forward. So in terms of recruitment campaigns,</p> <p>17 personal officers, 360 assessment of staff, the issues</p> <p>18 with violence?</p> <p>19 <b>A. Yes, so the recruitment campaign, as you're aware. In</b></p> <p>20 <b>terms of the 360, it was more -- the only 360s that</b></p> <p>21 <b>would occur were actually with the senior managers.</b></p> <p>22 <b>Staff was just on a general normal appraisal system. In</b></p> <p>23 <b>terms of personal officers, that was quite difficult,</b></p> <p>24 <b>albeit we then tried to stop cross-deploying staff from</b></p> <p>25 <b>unit to unit. There was continuity on res, the actual</b></p> <p style="text-align: center;">Page 120</p>

<p>1 units. So it was part learning from them</p> <p>2 recommendations, albeit not a full introduction of</p> <p>3 a personal officer.</p> <p>4 MS TOWNSHEND: Chair, I note the time. I just have one</p> <p>5 short topic. I was going to propose that we sit just</p> <p>6 for another ten minutes and hopefully that will finish</p> <p>7 this witness, and perhaps, then, a 45-minute lunch.</p> <p>8 THE CHAIR: That's fine. Thank you, Ms Townshend.</p> <p>9 MS TOWNSHEND: Mr Hanford, you have said in your witness</p> <p>10 statement -- you have set out some of the measures that</p> <p>11 you introduced after Panorama in order to try and</p> <p>12 ameliorate some of the problems that we saw. One of</p> <p>13 those was increasing staff and reducing hours. You have</p> <p>14 said in your witness statement how that was done, that</p> <p>15 you engaged the trade union, and that, in fact, ended up</p> <p>16 being done but you increased the number of DCMs in</p> <p>17 particular because there was an issue about peers</p> <p>18 managing each other. So there was a proper, as you</p> <p>19 say --</p> <p>20 <b>A. Which I alluded to earlier, yes.</b></p> <p>21 Q. You also said that you needed an aggressive recruitment</p> <p>22 campaign and this included providing additional staff by</p> <p>23 an organisation called Cornrell. It was a Cornrell</p> <p>24 apprenticeship. If I can just bring up on screen,</p> <p>25 please, &lt;IMB000156&gt;, pages 14 to 15. This is the</p> <p style="text-align: center;">Page 121</p>	<p>1 our care had what we could -- had, daily, what we could</p> <p>2 offer them, they volunteered to work additional hours.</p> <p>3 They were contracting on a weekly basis for up to three</p> <p>4 months to work an additional --</p> <p>5 Q. Mr Hanford, my question wasn't about -- was about</p> <p>6 recruitment.</p> <p>7 <b>A. I'll come back to that. So at the same time, we were</b></p> <p>8 <b>having a very aggressive recruitment campaign. Aligned</b></p> <p>9 <b>to that, I wanted to increase the number of DCMs on the</b></p> <p>10 <b>units. So that was also having an impact. My target</b></p> <p>11 <b>initially was to recruit 100 staff by April, which would</b></p> <p>12 <b>have taken us into April 2018.</b></p> <p>13 <b>Then aligned to that, that some of the staff would</b></p> <p>14 <b>be promoted, et cetera. So there was a significant</b></p> <p>15 <b>drive in that recruitment. We were successful in that</b></p> <p>16 <b>recruitment and it had also --</b></p> <p>17 Q. Just pause there --</p> <p>18 <b>A. Where we had been haemorrhaging staff previously --</b></p> <p>19 Q. Just --</p> <p>20 <b>A. If I can finish on this part. Where we were</b></p> <p>21 <b>experiencing high levels of staff attrition previously,</b></p> <p>22 <b>the engagement that you just alluded to, in relation to</b></p> <p>23 <b>our engagement with trade unions, et cetera, to reduce</b></p> <p>24 <b>their hours from 46 to 40, whilst maintaining the same</b></p> <p>25 <b>salary, actually did reduce the high levels of attrition</b></p> <p style="text-align: center;">Page 123</p>
<p>1 2018 IMB report. It is page 14, please. You see right</p> <p>2 at the bottom there, 7.7, "Staffing and shortages":</p> <p>3 "Staffing levels remained an issue throughout 2018.</p> <p>4 Staff shortages resulted in a failure to provide a full</p> <p>5 range of purposeful activities for detainees and, in</p> <p>6 some cases, missed hospital appointments. From the</p> <p>7 Board's own observations, more staff generally means</p> <p>8 more meaningful interaction with detainees, more time to</p> <p>9 assist with their issues and a general improvement of</p> <p>10 atmosphere in the centre. It also means less stress on</p> <p>11 staff."</p> <p>12 Would you agree that the recruiting targets weren't</p> <p>13 met?</p> <p>14 <b>A. I would suggest that the recruitment targets were -- as</b></p> <p>15 <b>I described, there was an aggressive recruitment</b></p> <p>16 <b>campaign, so the -- when I arrived there September '17,</b></p> <p>17 <b>which is a very short period left of '17, even though we</b></p> <p>18 <b>didn't have sufficient numbers of staff -- full-time</b></p> <p>19 <b>equivalent staff employed, we introduced contracted-hour</b></p> <p>20 <b>schemes, et cetera, to ensure we could offer the regime</b></p> <p>21 <b>as per the contract.</b></p> <p>22 <b>I was quite surprised, in fact, that staff did</b></p> <p>23 <b>volunteer, because the staff were bruised, significantly</b></p> <p>24 <b>bruised, after Panorama. However, the solidarity</b></p> <p>25 <b>amongst them to work together to ensure the detainees in</b></p> <p style="text-align: center;">Page 122</p>	<p>1 that we'd been facing. So we were making very good --</p> <p>2 very positive strides in the direction of this and, as</p> <p>3 a consequence of that, the evidence of this -- forgive</p> <p>4 me for going on. The evidence that supports that is the</p> <p>5 Home Office then extended the contract by two years</p> <p>6 because they were aware of the investment we were</p> <p>7 putting in to front-line staff.</p> <p>8 Q. The IMB said in 2018 that staffing levels remained --</p> <p>9 <b>A. I acknowledge them, that's why I have just described</b></p> <p>10 <b>what actions we were taking, because it takes quite</b></p> <p>11 <b>a long time to recruit people, get their clearances,</b></p> <p>12 <b>train them and then deploy them. So -- and I agree</b></p> <p>13 <b>entirely in that. I think that is adding the support to</b></p> <p>14 <b>why we, as an organisation, understood what the issues</b></p> <p>15 <b>were and what we were doing to address it.</b></p> <p>16 Q. Finally, I want to ask you about mental health training</p> <p>17 because that was another aspect which you say you worked</p> <p>18 on post Panorama. You said that the continuing -- there</p> <p>19 is a continuing absence of mental health training --</p> <p>20 sorry, the IMB said this. There was a continuing</p> <p>21 absence of mental health training and that there were</p> <p>22 plans to introduce a day's awareness training for</p> <p>23 existing staff but there would need to be a feedback of</p> <p>24 trials -- sorry, that was you that said that, rather</p> <p>25 than IMB --</p> <p style="text-align: center;">Page 124</p>

<p>1 <b>A. Yes.</b></p> <p>2 Q. -- from December 2017. Why do you say there was</p> <p>3 a continuing aspect of -- absence of mental health</p> <p>4 training? Was that something that you did initially as</p> <p>5 soon as you came in, in September 2017? Or was that</p> <p>6 something that was --</p> <p>7 <b>A. No, and I think it's still an evolving picture today.</b></p> <p>8 <b>I don't look at Brook House or Gatwick IRCs or wider</b></p> <p>9 <b>across the whole sector. We are all learning in society</b></p> <p>10 <b>about mental health and it's an evolving picture. The</b></p> <p>11 <b>initial ITC training for staff relating to mental health</b></p> <p>12 <b>was a bit of a -- it was a segue, really, into ACDT</b></p> <p>13 <b>management, et cetera. And it was apparent from initial</b></p> <p>14 <b>reviews that the mental health awareness training that</b></p> <p>15 <b>we needed to deliver was generally to look at</b></p> <p>16 <b>individuals looking at themselves, their health and</b></p> <p>17 <b>their own stress management within the workplace.</b></p> <p>18 <b>Because, if you don't get your own mental health right,</b></p> <p>19 <b>how are you going to care for others?</b></p> <p>20 <b>When I reviewed our training, it didn't look at</b></p> <p>21 <b>yourself prior to -- to ensure that you're able -- in</b></p> <p>22 <b>a good place yourself to engage with others and support.</b></p> <p>23 <b>Then it was trying to educate staff that people raising</b></p> <p>24 <b>mental health issues, there's no stigma towards that.</b></p> <p>25 <b>There should be no discrimination, et cetera. It was</b></p> <p style="text-align: center;">Page 125</p>	<p>1 not happened due to the need to prioritise training for</p> <p>2 new recruits in 2017, but we continue to recommend that</p> <p>3 there be this enhanced training."</p> <p>4 So at that point in 2018, there hadn't been enhanced</p> <p>5 training that hadn't been prioritised by G4S?</p> <p>6 <b>A. There had. There had. As part of the Brook House</b></p> <p>7 <b>action plan, we had engaged with a mental health first</b></p> <p>8 <b>aid provider and it had commenced.</b></p> <p>9 Q. Is the IMB wrong?</p> <p>10 <b>A. I'm hoping -- I'm assuming Dan Haughton is being</b></p> <p>11 <b>interviewed over the next few days.</b></p> <p>12 Q. He will.</p> <p>13 <b>A. Dan was leading on this. Dan will give further</b></p> <p>14 <b>clarification than what I can.</b></p> <p>15 Q. So when they say, "we are told by G4S that it has not</p> <p>16 happened", the enhanced mental health training, is that</p> <p>17 not correct?</p> <p>18 <b>A. I disagree with that statement. But if -- Dan -- I will</b></p> <p>19 <b>be corrected on that, but when I was feeding back to the</b></p> <p>20 <b>board in terms of where we were, what I was observing,</b></p> <p>21 <b>all emails receiving, et cetera, and my engagement with</b></p> <p>22 <b>people, was that this was occurring. But Dan will</b></p> <p>23 <b>confirm that.</b></p> <p>24 MS TOWNSHEND: Thank you, Mr Hanford. I don't have any more</p> <p>25 questions. If you wait there, the chair may have some</p> <p style="text-align: center;">Page 127</p>
<p>1 about trying to engage staff to be more open in terms of</p> <p>2 mental health relationships. Then understanding by</p> <p>3 looking at staff and realising how they can relate with</p> <p>4 others and we were looking into depression and then</p> <p>5 bringing it back into the workplace in terms of looking</p> <p>6 through the lens of those in our care.</p> <p>7 <b>It was apparent that the training we had wasn't</b></p> <p>8 <b>covering that. Hence why we engaged then with third</b></p> <p>9 <b>party providers to see what was -- because we didn't</b></p> <p>10 <b>have the subject matter experts and I note -- this is,</b></p> <p>11 <b>again -- we weren't training people into mental health</b></p> <p>12 <b>workers, it was just an awareness of mental health</b></p> <p>13 <b>concerns, of self, and then, when you understand from</b></p> <p>14 <b>self, it's how you support others.</b></p> <p>15 Q. Can I just bring one final document, please, up on</p> <p>16 screen. It's the same document, the IMB report,</p> <p>17 page 18, please. It is the last paragraph of that</p> <p>18 section on mental health:</p> <p>19 "In the past, the board has strongly advocated</p> <p>20 enhanced mental health training for staff who frequently</p> <p>21 have to deal with detainees suffering such problems.</p> <p>22 While appreciating it has always been a part of</p> <p>23 the initial basic training for new officers, the IMB is</p> <p>24 aware that DCOs often feel underskilled when dealing</p> <p>25 with acutely ill men. We are told by G4S that it has</p> <p style="text-align: center;">Page 126</p>	<p>1 for you.</p> <p>2 Questions from THE CHAIR</p> <p>3 THE CHAIR: Mr Hanford, thank you, I have one question for</p> <p>4 you.</p> <p>5 You have talked about the reflection that took place</p> <p>6 following Panorama. I'd like to ask you, take you back</p> <p>7 a few years again, and ask you a question about</p> <p>8 reflection. You talked about some of the challenges</p> <p>9 that you were concerned would prevent the ability to</p> <p>10 provide the care that you needed to, in terms of</p> <p>11 the introduction of the new beds. So you talked about</p> <p>12 changes in the detention estate, the acceptance of more</p> <p>13 time-served foreign national offenders in the system,</p> <p>14 and some of the learned behaviours that came with those</p> <p>15 individuals?</p> <p>16 <b>A. Prison-learned behaviours, yes.</b></p> <p>17 THE CHAIR: Prison-learned behaviours, indeed. You also</p> <p>18 talked about the advent of spice and the problems that</p> <p>19 caused in the prison estate and then into the detention</p> <p>20 estate as well, and you talked about the longer duration</p> <p>21 of detention that people were experiencing. Looking</p> <p>22 back, knowing that, and the concerns that raised for you</p> <p>23 in terms of the pressure there would be with extra beds</p> <p>24 in Brook House, could you/should you have reflected on</p> <p>25 whether you needed to train your staff any differently</p> <p style="text-align: center;">Page 128</p>



1 in response to those changes?

2 **A. In the wider context, I would say no. In terms of**

3 **having the benefits of that retrospective lens, in terms**

4 **of -- I wouldn't say training the staff, about changing**

5 **our processes, for example. If we had realised there**

6 **was going to be such an increase in time-served foreign**

7 **national offenders and behaviours that some of our staff**

8 **may not have experienced when we were looking after**

9 **5 per cent, even investing in things such as searching**

10 **equipment -- I've seen in Jon Collier's statement where**

11 **he suggests that we should make use of the BOSS chair,**

12 **et cetera. He's looking at that through a prison lens,**

13 **but the IRC estate hadn't caught up with that at that**

14 **point, albeit we ended up looking after the same**

15 **population. So I wouldn't necessarily say it was about**

16 **training but I think it was more of a holistic**

17 **management approach in terms of taking some learning**

18 **from the journey the Prison Service had been on and**

19 **making better use of, in some ways, history repeating**

20 **itself, from some prison behaviours. But in terms of**

21 **the staff, I think the staff were very well prepared.**

22 **They are -- the majority of the staff there are one of**

23 **the most professional staff group that I've met. Their**

24 **skill set and the relationships with the detainees was**

25 **phenomenal.**

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1 THE CHAIR: I don't know whether you will have heard any of

2 the evidence that some former detention staff gave us,

3 but some of them have told us that they didn't feel

4 prepared, they didn't feel equipped to deal with those

5 challenges.

6 **A. Okay, no, I think that's more generic rather than the**

7 **increase in population, and I understand that. One of**

8 **the -- we were having this similar feedback from the**

9 **staff post Panorama as well. Because what we then**

10 **engaged with the Home Office was, when I joined the**

11 **Prison Service in 1991, my first two weeks was at my**

12 **local prison. Then I went off to college. I went off**

13 **to college then understanding what a prison felt like,**

14 **what a prison smelt like, what a prison looked like. We**

15 **don't do that with our staff at the moment across the**

16 **whole custodial estate. They are sat there in**

17 **a training room having some visual sort of demonstration**

18 **of a PowerPoint. Even role playing is at its loosest**

19 **end. Then they are expected to walk into the facility**

20 **and it is quite alarming for many of them. We were, at**

21 **the time, trying to engage with the Home Office to give**

22 **them an awareness of the centre during the training so**

23 **they could re-engage with the training officers in**

24 **a comfortable environment, in a safe place, rather than**

25 **amongst their peers when they go live. So I think there**

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1 **are lessons to be learned in terms of how we can support**

2 **staff during the training.**

3 THE CHAIR: Thank you very much, Mr Hanford. I have no

4 other questions. Thank you, Mr Hanford. My apologies

5 to everybody that we are going to have a slightly

6 shorter lunch, but we will return at 2.00 pm.

7 Thank you for giving your time this morning. I know

8 you have been with us for a long morning. It is not the

9 easiest thing to do, but I appreciate hearing your

10 evidence.

11 **A. Thank you.**

12 **(The witness withdrew)**

13 **(1.22 pm)**

14 **(The short adjournment)**

15 **(2.00 pm)**

16 MR LIVINGSTON: Good afternoon, chair. We will now be

17 hearing from Paul Gasson.

18 MR PAUL GASSON (affirmed)

19 Examination by MR LIVINGSTON

20 MR LIVINGSTON: Thank you, Mr Gasson. Can you give us your

21 full name, please?

22 **A. Paul Gasson.**

23 Q. Chair, Mr Gasson has given two statements to the

24 inquiry. These are our references <HOM0332004>, which

25 is the first statement, and <HOM0332152>, which is the

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1 second statement. Can I ask for those to be adduced in

2 full?

3 THE CHAIR: Indeed, thank you.

4 MR LIVINGSTON: Mr Gasson, what that means is that those

5 statements are part of the evidence to the inquiry, so

6 I don't need to take you through every line in it.

7 Just to start with your role, you were

8 immigration/contract manager at Brook House

9 from May 2014 to January 2018; is that right?

10 **A. That's right, yes.**

11 Q. Initially, up until around 2017, there was one

12 Home Office team at Brook House responsible for both

13 monitoring the contract and for immigration issues; is

14 that right?

15 **A. That's right.**

16 Q. Were you the manager of that team?

17 **A. I was, yes.**

18 Q. How many people were you managing, roughly?

19 **A. So there were seven AO grades known as contact**

20 **management managers, and two deputy immigration**

21 **managers, and then myself.**

22 Q. You say in your statement, the first statement, at

23 paragraph 6, that in early 2017, Brook House was chosen

24 to run this pilot whereby there was a split in

25 responsibility for contract management and immigration;

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33 (Pages 129 to 132)

<p>1 is that right?</p> <p>2 <b>A. That's right.</b></p> <p>3 Q. Just clarify something for us, please. In your first</p> <p>4 statement, you say that the immediate impact on you of</p> <p>5 the pilot was that you were no longer responsible for</p> <p>6 the immigration functions, and then, in the second</p> <p>7 statement, you say that you no longer had responsibility</p> <p>8 for the contract management functions. Which one was</p> <p>9 it?</p> <p>10 <b>A. What does the second one say?</b></p> <p>11 Q. It said that you no longer had responsibility for</p> <p>12 contract management functions during the pilot. Is that</p> <p>13 right?</p> <p>14 <b>A. It's probably meant to say "contract management".</b></p> <p>15 Q. Am I right in thinking, then, that you continued during</p> <p>16 the pilot, so during the relevant period in 2017, to be</p> <p>17 responsible for contract management?</p> <p>18 <b>A. Yes, that's right.</b></p> <p>19 Q. Ian Castle described you as "the compliance manager".</p> <p>20 I'm not sure if that was your job title, but is that</p> <p>21 what you were?</p> <p>22 <b>A. So that's a more recent job title. The compliance team,</b></p> <p>23 <b>the desk compliance team, detention escorting services</b></p> <p>24 <b>compliance team, that's a relatively new term that came</b></p> <p>25 <b>in after the pilot. Before that, it was just contract</b></p> <p style="text-align: center;">Page 133</p>	<p>1 Q. As part of your job, you attended Brook House pretty</p> <p>2 much every day?</p> <p>3 <b>A. Yes, unless there was other work that took me away.</b></p> <p>4 Q. You said at one point that you were doing work on one of</p> <p>5 the bids for the contract extension, or something like</p> <p>6 that, that took you away.</p> <p>7 <b>A. I was quite heavily involved in a procurement exercise</b></p> <p>8 <b>from around early 2016 right through to maybe the first</b></p> <p>9 <b>quarter, second quarter of 2017.</b></p> <p>10 Q. In your absence, who would be the manager on site?</p> <p>11 <b>A. So when it came to actually marking the bids, I think</b></p> <p>12 <b>there were four or five bids that came in --</b></p> <p>13 Q. Sorry, not the bid. So when you're not at Brook House.</p> <p>14 So you were in Brook House pretty much every day, but on</p> <p>15 the days you're not in Brook House, who is the sort of</p> <p>16 most senior person there?</p> <p>17 <b>A. One of the deputy immigration managers.</b></p> <p>18 Q. Did you consider that, as an employee of the Home Office</p> <p>19 who was at Brook House pretty much every day, you</p> <p>20 personally had responsibility for setting the tone and</p> <p>21 culture at Brook House, or did you see that as a G4S</p> <p>22 thing?</p> <p>23 <b>A. I wouldn't set the tone or the culture, no.</b></p> <p>24 Q. Did you think that you were any part of that?</p> <p>25 <b>A. I think I upheld, where I could, the expected standards</b></p> <p style="text-align: center;">Page 135</p>
<p>1 <b>monitor/immigration.</b></p> <p>2 Q. So at a very high level, you were immigration/contract</p> <p>3 monitor and during the pilot you were just contract</p> <p>4 monitor?</p> <p>5 <b>A. There are grey areas, there are overlaps. It was</b></p> <p>6 <b>a pilot, so the structure still had to be finalised,</b></p> <p>7 <b>yes.</b></p> <p>8 Q. In your first statement at paragraph 8, you set out some</p> <p>9 of the things from your job description from 2013. So</p> <p>10 I just want to check which of those things were still</p> <p>11 part of your job in 2017 during the pilot. So</p> <p>12 monitoring contractual compliance, presumably that's</p> <p>13 yes?</p> <p>14 <b>A. Yes.</b></p> <p>15 Q. Chairing meetings with G4S, reviewing performance and</p> <p>16 challenging nondelivery; yes?</p> <p>17 <b>A. Chairing meetings up to a point, yes.</b></p> <p>18 Q. Ensuring detainees were provided with an effective</p> <p>19 service?</p> <p>20 <b>A. Yes.</b></p> <p>21 Q. Carrying out the Home Office's statutory duties around</p> <p>22 the centre?</p> <p>23 <b>A. Yes.</b></p> <p>24 Q. And producing reports and briefings?</p> <p>25 <b>A. When required, yes.</b></p> <p style="text-align: center;">Page 134</p>	<p>1 <b>of the DC Rules, the DSO and the contractual obligations</b></p> <p>2 <b>that we were working to.</b></p> <p>3 Q. But, given that you were interacting with staff and</p> <p>4 detainees, I think you've said, presumably you would</p> <p>5 also be part of the culture that they see as well?</p> <p>6 <b>A. If you phrase it like that, I guess so, yes.</b></p> <p>7 Q. How often did you visit the wings, roughly? Was it</p> <p>8 every day?</p> <p>9 <b>A. The actual residential units?</b></p> <p>10 Q. Yes.</p> <p>11 <b>A. I didn't really visit the residential units that often,</b></p> <p>12 <b>no.</b></p> <p>13 Q. So once a month?</p> <p>14 <b>A. My contract monitoring took in all areas of the centre.</b></p> <p>15 <b>I had my own, sort of -- not routine, but I had all the</b></p> <p>16 <b>areas that I went to, which did include the residential</b></p> <p>17 <b>units, was done in a different route -- I can explain</b></p> <p>18 <b>that at some point if you're interested.</b></p> <p>19 Q. I just want to know roughly how often -- you said not</p> <p>20 that often. But, roughly, how often would you go to the</p> <p>21 wings?</p> <p>22 <b>A. About once a week or once every two weeks.</b></p> <p>23 Q. How often do you reckon you would chat to DCOs and DCMs</p> <p>24 at Brook House?</p> <p>25 <b>A. In my role as immigration manager, probably not as much</b></p> <p style="text-align: center;">Page 136</p>

<p>1 as my previous role as deputy immigration manager. It</p> <p>2 was a bit of a step away from the operational side of</p> <p>3 things in terms of the actual centre itself. But daily.</p> <p>4 I would see staff daily.</p> <p>5 Q. In 2017?</p> <p>6 A. Yes.</p> <p>7 Q. You said in your role as immigration manager, but</p> <p>8 I think, by 2017, you're not really immigration manager</p> <p>9 because that's the pilot?</p> <p>10 A. Yes, the pilot was there, so contract manager.</p> <p>11 Q. But, at that point, how often were you speaking to</p> <p>12 staff?</p> <p>13 A. So DCMs and above, probably daily.</p> <p>14 Q. How often do you reckon that you chatted with detainees</p> <p>15 during that period?</p> <p>16 A. It depends where I was. If I was in the centre, then</p> <p>17 I would obviously see the detained individuals. My two</p> <p>18 deputy immigration managers would see them on a daily</p> <p>19 basis.</p> <p>20 Q. So you slightly less than that?</p> <p>21 A. It would be less than daily, yes.</p> <p>22 Q. Just in terms of the contact that you did have, as you</p> <p>23 know, because it has been put to you in advance,</p> <p>24 Ben Saunders suggested that you wouldn't talk to</p> <p>25 detained people and said that you would shy away from</p> <p style="text-align: center;">Page 137</p>	<p>1 the Home Office and ask about their case. So if I could</p> <p>2 take their reference from them, because they all had ID</p> <p>3 badges, I could say to them, "No problems at all. I'll</p> <p>4 find out for you. I'll go back into the office and, if</p> <p>5 need be, we will call you up later today or we will get</p> <p>6 a message down to your wing officer".</p> <p>7 Q. How do you respond to the description of you by</p> <p>8 Nathan Ward as not showing any signs of compassion?</p> <p>9 A. I can only assume he was describing obviously pre 2014,</p> <p>10 because I was away from Brook House between -- I think</p> <p>11 it was April 2013 and I came back in May 2014, and</p> <p>12 I think he left, I think he says, close to that date.</p> <p>13 So the only time I could think that I had interaction</p> <p>14 with Nathan would have been during the CSU visits and</p> <p>15 every CSU visit I went down, rule 40/rule 42, usually</p> <p>16 rule 40/rule 42 wasn't that common. I would have the</p> <p>17 background information of the person that I was going to</p> <p>18 see. Quite near the beginning of the contract, myself</p> <p>19 and the other deputy immigration manager, we put in</p> <p>20 place a process where every day at 10.00 am, myself, the</p> <p>21 duty operations manager, known as Oscar 1 -- the duty</p> <p>22 director came on later -- later on in the period of</p> <p>23 the contract, but healthcare, we would meet in that</p> <p>24 unit, we would go through the individuals, we would get</p> <p>25 some information, what were they down there for,</p> <p style="text-align: center;">Page 139</p>
<p>1 that type of interaction, and Nathan Ward described you</p> <p>2 as purely functional and clinical about your tasks and</p> <p>3 not showing any signs of compassion. How do you respond</p> <p>4 to those descriptions?</p> <p>5 A. I respond to that in my statement, which I can draw you</p> <p>6 to, if that's okay.</p> <p>7 Q. Yes.</p> <p>8 A. I think it is the second statement.</p> <p>9 Q. You say at paragraph 65 of your -- I think it is</p> <p>10 paragraph 65. Maybe I've got the wrong paragraph. Yes,</p> <p>11 paragraphs 65 and 67. If you can help us with -- do you</p> <p>12 accept that you would shy away from interacting with</p> <p>13 detained people?</p> <p>14 A. So what Ben does is, with the context, he compares me to</p> <p>15 the immigration manager at Tinsley House, who he also</p> <p>16 describes, I think -- no, who he describes as brash and</p> <p>17 would go out in the centre. So I wouldn't shy away from</p> <p>18 interactions, to answer your question directly, no.</p> <p>19 When I'm walking around the centre, I would visit all</p> <p>20 the areas, be it the reception area, the discharge area,</p> <p>21 the various activities going on. If I saw a detainee in</p> <p>22 the centre and they wanted to speak to me, of course</p> <p>23 I would speak to them. I would often take a pen and</p> <p>24 a pad with me when I walked around the centre, because</p> <p>25 it was highly likely that someone would want to speak to</p> <p style="text-align: center;">Page 138</p>	<p>1 et cetera, if we needed to know that information, what</p> <p>2 have they been like since --</p> <p>3 Q. I'm going to come on to --</p> <p>4 A. I'm coming to it. So my interaction with Nathan,</p> <p>5 because he was head of Tinsley House, would have been in</p> <p>6 CSU, because I don't remember seeing him at Brook House</p> <p>7 that often.</p> <p>8 Q. Then the question was, do you accept -- what do you say</p> <p>9 to the suggestion that you didn't show compassion during</p> <p>10 those visits?</p> <p>11 A. I don't think that was the case at all.</p> <p>12 Q. I want to come on to ask you some questions about the</p> <p>13 contract and your role in monitoring the contract. Now,</p> <p>14 obviously, it is a big, lengthy contract and I'm not</p> <p>15 going to go through it all in detail, but very broadly,</p> <p>16 Mr Gasson, as I think you talk about, schedule D of</p> <p>17 the contract set out all of the things that G4S were</p> <p>18 required to do under the contract?</p> <p>19 A. Sure.</p> <p>20 Q. And schedule G set out the performance measures if there</p> <p>21 was a failure to comply. Is that right, as you remember</p> <p>22 it?</p> <p>23 A. That's absolutely right.</p> <p>24 Q. In terms of evaluating G4S's performance under the</p> <p>25 contract, you set out in your first statement, at</p> <p style="text-align: center;">Page 140</p>

<p>1 paragraph 14, some of the ways you would do that. So</p> <p>2 you say that partly it was through a self-declaration</p> <p>3 from G4S, talking to staff, reviewing raw data, checking</p> <p>4 the cleanliness of the centre, ensuring there'd been</p> <p>5 correct authorisation for rule 40 and rule 42, reviewing</p> <p>6 use of force reviews, and dip sampling complaint</p> <p>7 responses. I'm going to come on to some of those</p> <p>8 individually in a bit, but did you feel overall, through</p> <p>9 those various means I've just read out, you, as contract</p> <p>10 manager, were able to adequately monitor whether G4S</p> <p>11 were complying with the contract?</p> <p>12 <b>A. I think with schedule G, pretty much most of schedule G.</b></p> <p>13 Q. What about with schedule D, with the longer list of</p> <p>14 things that they were meant to be doing under the</p> <p>15 contract?</p> <p>16 <b>A. Well, schedule D was the operational spec. Schedule G</b></p> <p>17 <b>was what performance measured -- what performance</b></p> <p>18 <b>measures could be brought up against. Not everything in</b></p> <p>19 <b>schedule D, so the operational side of the contract, was</b></p> <p>20 <b>in schedule G.</b></p> <p>21 Q. Yes. So did you see your role or was your role only to</p> <p>22 monitor the bits of the contract that could lead to</p> <p>23 penalty points under schedule G?</p> <p>24 <b>A. No.</b></p> <p>25 Q. Or was it to also monitor schedule D, the things under</p> <p style="text-align: center;">Page 141</p>	<p>1 through the course of him being there, which I think was</p> <p>2 from 2013 or 2014 onwards, and he says that, through</p> <p>3 that time, they developed a more robust contract</p> <p>4 assurance model, and he says that, initially, he found</p> <p>5 that the Home Office were sloppy and didn't scrutinise</p> <p>6 the contract at all. Was that ever your experience?</p> <p>7 <b>A. What time was that? What period of date was that?</b></p> <p>8 Q. From 2014 onwards. He says, during that time, they</p> <p>9 developed a more robust assurance model but at least at</p> <p>10 some point he's saying the Home Office were sloppy and</p> <p>11 weren't scrutinising the contract at all. Was that your</p> <p>12 experience?</p> <p>13 <b>A. That wasn't my experience, no.</b></p> <p>14 Q. If we could bring up &lt;INQ000011&gt;. Mr Gasson, this is</p> <p>15 the National Audit Office report, dated July 2019. If</p> <p>16 we can go to page 8, please, at paragraph 19. This is</p> <p>17 the National Audit Office's report and they are talking</p> <p>18 about Home Office oversight of the contract. It says,</p> <p>19 at paragraph 19:</p> <p>20 "Until 2018, the Home Office did not have the people</p> <p>21 in place to properly verify or validate G4S's reported</p> <p>22 level of performance. The onsite monitoring of G4S's</p> <p>23 contractual compliance was part of one executive</p> <p>24 officer's role (a junior civil servant) who sat in the</p> <p>25 detainee casework team and focused mainly on monitoring</p> <p style="text-align: center;">Page 143</p>
<p>1 schedule D?</p> <p>2 <b>A. Yes, both. A bit of both.</b></p> <p>3 Q. Did you feel that, overall, through these various means,</p> <p>4 you were able to actually monitor whether G4S were</p> <p>5 providing adequate care for the detained people at</p> <p>6 Brook House?</p> <p>7 <b>A. Care? How -- what do you mean? In terms of day-to-day</b></p> <p>8 <b>well-being, looking after them -- giving them three</b></p> <p>9 <b>cooked meals a day, enabling them to have showers? Yes.</b></p> <p>10 Q. The responsibilities of Home Office that the Home Office</p> <p>11 has contracted out to G4S to look after people who are</p> <p>12 detained at Brook House?</p> <p>13 <b>A. From what I could see, obviously there were areas that</b></p> <p>14 <b>they didn't, because their performance measures were</b></p> <p>15 <b>applied, and I think that's probably quite apparent --</b></p> <p>16 Q. I'm not looking at performance measures. I'm asking you</p> <p>17 whether you felt that in your role you were able to</p> <p>18 actually monitor whether G4S were providing sufficient</p> <p>19 care to the people at Brook House?</p> <p>20 <b>A. Inasmuch as it was kind of me and me only, then yes.</b></p> <p>21 Q. You felt that you were?</p> <p>22 <b>A. Yes.</b></p> <p>23 Q. In Ben Saunders' interview with Verita -- I don't need</p> <p>24 to bring it up on screen at the moment but it is</p> <p>25 &lt;VER000226&gt; at page 10, paragraph 112 -- he describes,</p> <p style="text-align: center;">Page 142</p>	<p>1 G4S's level of staffing. This was insufficient to</p> <p>2 enable the Home Office to properly examine G4S's</p> <p>3 self-reported performance or challenge G4S on its</p> <p>4 management of the centre."</p> <p>5 Were you the junior civil servant that it mentions</p> <p>6 there?</p> <p>7 <b>A. No, I'd left by that point.</b></p> <p>8 Q. It is talking about "until 2018"?</p> <p>9 <b>A. I see, sorry. So that was part of the contract</b></p> <p>10 <b>monitoring that we did. One of my deputy immigration</b></p> <p>11 <b>managers, he was very much focused on the staffing from</b></p> <p>12 <b>G4S.</b></p> <p>13 Q. Who was, sorry?</p> <p>14 <b>A. One of the deputy immigration managers.</b></p> <p>15 Q. Who was that?</p> <p>16 <b>A. Simon. And I think that's who that refers to. So part</b></p> <p>17 <b>of the contract monitoring role, we were able to do it.</b></p> <p>18 <b>So Simon worked hard, one, to get the raw data from G4S,</b></p> <p>19 <b>which was very difficult, and once we'd got the raw</b></p> <p>20 <b>data, we were then able to compare it to the stats that</b></p> <p>21 <b>G4S were providing us.</b></p> <p>22 Q. Is this about staffing you're talking about?</p> <p>23 <b>A. This is about staffing.</b></p> <p>24 Q. I'm going to come on to staffing in a bit. What this</p> <p>25 says here is that the setup before 2018 was insufficient</p> <p style="text-align: center;">Page 144</p>

<p>1 to enable the Home Office to properly examine G4S's</p> <p>2 self-reported performance or challenge G4S and its</p> <p>3 management in the centre. Do you agree with that</p> <p>4 conclusion?</p> <p>5 <b>A. I think that our team, the contract management team, was</b></p> <p>6 <b>insufficient to properly look into every area that G4S</b></p> <p>7 <b>were operating within the centre.</b></p> <p>8 Q. Was that a resource issue? You didn't have enough</p> <p>9 people on the ground?</p> <p>10 <b>A. I would say yes because our roles were split, even up</b></p> <p>11 <b>until -- even past the pilot, there were still areas of</b></p> <p>12 <b>immigration work that me -- myself and my team would be</b></p> <p>13 <b>involved in, and a lot of the time the priority was</b></p> <p>14 <b>towards the immigration side of things and helping out</b></p> <p>15 <b>caseworkers, progressing the cases through to get</b></p> <p>16 <b>people -- you know, through detention as quickly as</b></p> <p>17 <b>possible, because, you know, there was no sort of -- we</b></p> <p>18 <b>didn't want to have people detained longer than</b></p> <p>19 <b>necessary.</b></p> <p>20 Q. That focus on immigration, you felt that that meant that</p> <p>21 you couldn't focus as much as you would have liked on</p> <p>22 monitoring contractual compliance?</p> <p>23 <b>A. No, not as much as we could, and certainly not as much</b></p> <p>24 <b>as I understand now happens. But I disagree with the</b></p> <p>25 <b>statement that that was the only onsite monitoring.</b></p> <p style="text-align: center;">Page 145</p>	<p>1 Q. Now if we can have up on screen, please, &lt;VER000226&gt; at</p> <p>2 page 11. This is a transcript of an interview that</p> <p>3 Ben Saunders had with Verita, and paragraph 129 -- I'm</p> <p>4 just going to take you to a few bits of this and then</p> <p>5 get you to comment. Paragraph 129, he's asked about the</p> <p>6 Home Office and it's suggested to him that the</p> <p>7 Home Office should, and could, have noticed all sorts of</p> <p>8 things and probably didn't, and he says:</p> <p>9 "Yes, I think that's absolutely fair. Their primary</p> <p>10 focus was all about the removal process. Absolutely</p> <p>11 right. Of course, they care about the welfare and at</p> <p>12 different degrees, but, yes, their primary focus was the</p> <p>13 removal process."</p> <p>14 First of all, do you agree with that, that the</p> <p>15 Home Office's primary focus was the removal process?</p> <p>16 <b>A. From the removal centre, yes.</b></p> <p>17 Q. If we can go to the bottom there of that page, please,</p> <p>18 paragraph 145. This is talking about you and saying</p> <p>19 that you would care more about official visits. If we</p> <p>20 can go on to the next page, please, and then, at</p> <p>21 paragraph 147, it is noted that you cared more about</p> <p>22 visits than you did about education delivery, for</p> <p>23 example:</p> <p>24 "Yes, ACDTs were important ... but not part of</p> <p>25 [your] daily concern."</p> <p style="text-align: center;">Page 147</p>
<p>1 Q. I just want to understand -- so you're saying,</p> <p>2 essentially, that it is a resourcing issue that led to</p> <p>3 you being able to insufficiently examine performance or</p> <p>4 challenge G4S. Was it just a resourcing issue or was it</p> <p>5 also the structure of the contract as well?</p> <p>6 <b>A. I did -- we regularly challenged G4S on their failures.</b></p> <p>7 <b>Weekly issues raised failures, other issues that G4S</b></p> <p>8 <b>weren't self-auditing themselves, weren't raising</b></p> <p>9 <b>themselves.</b></p> <p>10 Q. You think you were able to challenge G4S on its</p> <p>11 management at the centre satisfactorily?</p> <p>12 <b>A. In line with the contract -- satisfactorily? It would</b></p> <p>13 <b>have helped if there was another two or three people</b></p> <p>14 <b>doing it at the same time, of course, but from my</b></p> <p>15 <b>walking around the place, observations, I was raising</b></p> <p>16 <b>things that perhaps they weren't aware of, and that</b></p> <p>17 <b>would go on the weekly issues talk.</b></p> <p>18 Q. I want to come on to the extent to which welfare of</p> <p>19 detainees was prioritised, because you say in your first</p> <p>20 statement, at paragraph 17, the welfare of every</p> <p>21 detained person at Brook House was a priority and the</p> <p>22 responsibility of those who worked at the centre. Do</p> <p>23 you include yourself in that regard when you say "those</p> <p>24 who worked at the centre"?</p> <p>25 <b>A. Yes, of course.</b></p> <p style="text-align: center;">Page 146</p>	<p>1 Talking about you, it says:</p> <p>2 "He was more interested in the delivery of</p> <p>3 removals."</p> <p>4 Then if we can go to paragraph 249, which is at</p> <p>5 page 20, please. While we are doing that, Mr Gasson, do</p> <p>6 you accept that you personally were more -- cared more</p> <p>7 about the delivery of removals rather than things like</p> <p>8 education delivery and ACDTs?</p> <p>9 <b>A. No, of course not. It was -- the removal centre was</b></p> <p>10 <b>there to bring people in safely, look after them, give</b></p> <p>11 <b>them purposeful activity and then discharge them at the</b></p> <p>12 <b>correct time. The question of welfare was always there.</b></p> <p>13 <b>It runs throughout the expectation and the high</b></p> <p>14 <b>standards that the Home Office would hold any supplier.</b></p> <p>15 <b>So, yes, there was a focus on removals because it was</b></p> <p>16 <b>a removal centre, and --</b></p> <p>17 Q. You were contract manager --</p> <p>18 <b>A. But not to the detriment of someone's welfare, no.</b></p> <p>19 Q. You were contract manager. Why were you focused on</p> <p>20 removals?</p> <p>21 <b>A. What do you mean?</b></p> <p>22 Q. What part of your role was to focus on removals?</p> <p>23 <b>A. So in schedule G, one of the performance measures was</b></p> <p>24 <b>getting people to discharge on time, handing over to the</b></p> <p>25 <b>overseas escorts and also there was another one about</b></p> <p style="text-align: center;">Page 148</p>

<p>1 <b>release as well. So that was quite important.</b></p> <p>2 Q. Was that something which -- I appreciate you're saying</p> <p>3 that you looked at all of these things, but what we are</p> <p>4 looking at is prioritisation and the suggestion that's</p> <p>5 being made by Ben Saunders, who was the director of</p> <p>6 the centre, so very senior, is that you cared more, and</p> <p>7 focused more, on the couple of examples you just gave</p> <p>8 there about removals, whether it's discharge or release,</p> <p>9 than you did about things like welfare?</p> <p>10 <b>A. I don't know how he got that impression. I don't know</b></p> <p>11 <b>where he's drawing that from. I don't think I had</b></p> <p>12 <b>a conversation with him, ever, about ACDTs not -- you</b></p> <p>13 <b>know, in comparison to removals. There were lots of</b></p> <p>14 <b>people who were on ACDTs in the run-up to a removal for</b></p> <p>15 <b>probably obvious reasons, but that didn't mean that the</b></p> <p>16 <b>person couldn't be removed appropriately and safely.</b></p> <p>17 Q. At page 20, paragraph 249 there, Ben Saunders says:</p> <p>18 "Frankly, the Home Office didn't really care about</p> <p>19 the people we looked after, and that's a very general</p> <p>20 kind of comment and I wouldn't want it quoted that way</p> <p>21 in the report. There are elements of people in the</p> <p>22 Home Office who did care very much but the Home Office</p> <p>23 entity corporately was mostly concerned about the</p> <p>24 removal process and the functionality of it."</p> <p>25 So it is similar to the things that I have read out</p> <p style="text-align: center;">Page 149</p>	<p>1 substantiated complaints? Did you think there was an</p> <p>2 emphasis on security in the contract?</p> <p>3 <b>A. When you compare the points, I guess so, yeah.</b></p> <p>4 Q. Were you given a steer from above -- I know your direct</p> <p>5 line manager was Ian Castle; is that right?</p> <p>6 <b>A. Not at the material time.</b></p> <p>7 Q. Who was your line manager at that time?</p> <p>8 <b>A. The guy I had before was a guy called Carl, who left</b></p> <p>9 <b>I think in March/April time.</b></p> <p>10 Q. 2017?</p> <p>11 <b>A. Yes, and then there was a gap, there was nobody.</b></p> <p>12 Q. Okay. Were you given a steer from anyone from above,</p> <p>13 either at the relevant period or before, about what your</p> <p>14 priority should be? So you've got lots of demands on</p> <p>15 your time.</p> <p>16 <b>A. Sure.</b></p> <p>17 Q. What's your priority?</p> <p>18 <b>A. Not really.</b></p> <p>19 Q. What did they care about?</p> <p>20 <b>A. No, but I was, you know, focused on the contract side of</b></p> <p>21 <b>things, on schedule G, for example. Because certain</b></p> <p>22 <b>things did crop up more than once.</b></p> <p>23 Q. I suppose the question is, to what end were you focused</p> <p>24 on that? Was it almost a sort of details-based role</p> <p>25 where you just felt it was your role to find out whether</p> <p style="text-align: center;">Page 151</p>
<p>1 to you, but do you have any comment to make on that,</p> <p>2 that, corporately, the Home Office was mostly concerned</p> <p>3 about the removal process?</p> <p>4 <b>A. Not to the detriment of someone's welfare, no.</b></p> <p>5 Q. Do you accept that there was no requirement for G4S to</p> <p>6 report to you or to the Home Office, more broadly, on</p> <p>7 the overall welfare of detainees and their overall</p> <p>8 quality of life?</p> <p>9 <b>A. I don't think that was a requirement, no.</b></p> <p>10 Q. And they didn't do so, did they?</p> <p>11 <b>A. Not an overall picture, no. We'd get sort of statistics</b></p> <p>12 <b>of how many ACDTs were open, things like that, and then</b></p> <p>13 <b>sort of cross-compare to other months to see if there</b></p> <p>14 <b>was a trend going up or down.</b></p> <p>15 Q. If you were asked how -- "What's the life of somebody at</p> <p>16 Brook House like?", you're not getting any report on</p> <p>17 that, are you?</p> <p>18 <b>A. No.</b></p> <p>19 Q. Do you think that, overall -- again, I don't think we</p> <p>20 need to go through each -- we are certainly not going to</p> <p>21 go through each provision of the contract. But do you</p> <p>22 think that the structure of the contract prioritised</p> <p>23 security over welfare? So, for example, the fact that</p> <p>24 there were big fines for things like escapes compared to</p> <p>25 the levels of fines or penalties for things like</p> <p style="text-align: center;">Page 150</p>	<p>1 they'd breached the contract and sort of deal with it,</p> <p>2 or did you -- were you dealing with it to some larger</p> <p>3 end?</p> <p>4 <b>A. It was -- I guess it's twofold, really. Because,</b></p> <p>5 <b>obviously, the contract was there. It was put in place</b></p> <p>6 <b>for the reasons I gave earlier: getting people in,</b></p> <p>7 <b>looking after them, making sure that they leave on time.</b></p> <p>8 <b>But, in the meantime, they were living -- that was their</b></p> <p>9 <b>residence. So it was important to me that the place --</b></p> <p>10 <b>you know, at its very basic level -- was clean. So when</b></p> <p>11 <b>I went around the units, I went around at different</b></p> <p>12 <b>times. If I went around early in the morning, I'd go</b></p> <p>13 <b>maybe once a week, I'd pop in about 7 o'clock, I'd walk</b></p> <p>14 <b>around every single unit, I'd walk around the entire</b></p> <p>15 <b>centre, just to get a sense of the cleanliness. I'd</b></p> <p>16 <b>look in the showers, for example, fairly subjective, but</b></p> <p>17 <b>if I looked and thought, "I wouldn't take a shower in</b></p> <p>18 <b>there. That's not clean, that hasn't been cleaned". If</b></p> <p>19 <b>people wake up to that environment, the chances are</b></p> <p>20 <b>their behaviour may reflect, in some cases, the</b></p> <p>21 <b>environment they live in. Also, to wake up and be able</b></p> <p>22 <b>to have a shower in a clean area, I don't think is much</b></p> <p>23 <b>to ask. In fact, it is a very low threshold, really.</b></p> <p>24 <b>If I went around at lunch time or after lunch or before</b></p> <p>25 <b>lunch and the bins are overflowing, for example, then</b></p> <p style="text-align: center;">Page 152</p>

<p>1 people have been out and about all morning, so the bins</p> <p>2 probably will be overflowing. Is there anyone out</p> <p>3 cleaning at that point? Is there anyone sort of making</p> <p>4 the bins nice for when they come out after lunch -- or</p> <p>5 before lunch, I should say?</p> <p>6 Q. To step back, then, one of your priorities was</p> <p>7 cleanliness and the physical environment?</p> <p>8 A. One was cleanliness. Yeah, if I went down to reception</p> <p>9 I would speak to the people in there, "Hi, how are</p> <p>10 you?", you know, basic courtesy, "How long have you been</p> <p>11 here for?". To try to gauge how long someone had been</p> <p>12 waiting in reception, because there were a couple of</p> <p>13 criticisms in the past where it was taking a long time</p> <p>14 for someone to come off the van in the sterile area</p> <p>15 between the gatehouse and the centre, brought into the</p> <p>16 reception area, go through the reception process and</p> <p>17 eventually go to the room. Especially if it was at</p> <p>18 night-time. So sometimes DETMU -- I'm assuming you know</p> <p>19 who DETMU are, the population management movement for</p> <p>20 the detention estate. We sometimes got a call from them</p> <p>21 to say "Tascor" -- they're the escorting contractor at</p> <p>22 the time -- "have three vans outside to send us. Why is</p> <p>23 it taking so long?", for example, or they would say,</p> <p>24 "Tascor dropped someone off last night at 1 am and they</p> <p>25 didn't leave until 5 am. They weren't able to get the</p> <p style="text-align: center;">Page 153</p>	<p>1 taking. And if it seemed that, yeah, there was three or</p> <p>2 four vans piling up, why was that?</p> <p>3 Q. It sounds like movement at reception, the length of time</p> <p>4 people spent at reception, and to get in and out, was</p> <p>5 something that was a concern to you at certain points?</p> <p>6 A. It was a concern to me because -- well, you know, for</p> <p>7 obvious reasons. The welfare of the people. Just</p> <p>8 because I was working on contract monitoring, didn't</p> <p>9 mean that I didn't care about the people. It was</p> <p>10 still -- from a Home Office perspective, we still wanted</p> <p>11 people to be looked after.</p> <p>12 Q. I am going to ask you about a particular area in which</p> <p>13 schedule G applied. If we can have up on screen,</p> <p>14 please, &lt;HOM000921&gt;. This is schedule G of</p> <p>15 the contract. At page 5, please. It sets out here, if</p> <p>16 you look at (c), this is one of the areas of</p> <p>17 the contract which could lead to penalty points, and it</p> <p>18 says:</p> <p>19 "Self-harm resulting in injury."</p> <p>20 Then it says:</p> <p>21 "Any known incident of deliberate self-harm</p> <p>22 resulting in physical injury requiring any form of</p> <p>23 healthcare intervention and involves any failure to</p> <p>24 follow laid-down procedures for the safety of detainees</p> <p>25 as set out in schedule D."</p> <p style="text-align: center;">Page 155</p>
<p>1 person off the van". So, in a reactive contract</p> <p>2 monitoring stance, I would then go and find out what</p> <p>3 happened to that person, why did it take so long, were</p> <p>4 there staff in the reception area? I would spend time</p> <p>5 in the vehicle area. They'd have a vehicle log. Every</p> <p>6 single number plate was logged. Every single person on</p> <p>7 that van was referenced. So then I could go back and I</p> <p>8 could follow that person retrospectively, once I got</p> <p>9 permission to view the CCTV, to see how long that person</p> <p>10 took. Although it wasn't schedule G, I could</p> <p>11 necessarily say to G4S, "Right, this took longer than</p> <p>12 30 minutes to get this person from A to B", A being</p> <p>13 entrance to reception, and B being in their room and</p> <p>14 able to lay down in their bed. It is still a concern</p> <p>15 that that person was up half the night or more. I don't</p> <p>16 know how long he's travelled beforehand. To get him</p> <p>17 through -- you know, what's going on? That was more</p> <p>18 than one instance. So part of the contract monitoring</p> <p>19 focus -- and it wasn't every day, it wasn't every week</p> <p>20 that I would check the vehicle logs. So I would either</p> <p>21 be notified by DETMU, who also had their own contract</p> <p>22 monitoring team for escorts, so we worked quite closely</p> <p>23 with those. So, yeah. And then, proactively, sometimes</p> <p>24 I would go in and I would spend maybe an hour looking</p> <p>25 through the vehicle log just to see how long vans were</p> <p style="text-align: center;">Page 154</p>	<p>1 Do you remember this part of the contract?</p> <p>2 A. Yes.</p> <p>3 Q. What, to your mind, were the laid-down procedures for</p> <p>4 the safety of detainees as set out in schedule D?</p> <p>5 I obviously don't need the exact words, but we have</p> <p>6 looked through schedule D and there is nothing that</p> <p>7 appears to set out any procedures in this regard?</p> <p>8 A. No. Unfortunately, the contract doesn't always --</p> <p>9 schedule G doesn't always reflect schedule D and that</p> <p>10 was just a contract that was part of Brook House. It</p> <p>11 was done obviously before any staff -- Home Office staff</p> <p>12 worked there from 2009 onwards. However, I think it is</p> <p>13 14.1 in schedule D. That talks about safer detention</p> <p>14 and the laid-down procedures. So that would be --</p> <p>15 I think -- I might be quoting this wrong, but I'm sure</p> <p>16 you've got the contract -- 14.1 onwards would be having</p> <p>17 the ACDT procedures, all staff, all officers trained in</p> <p>18 ACDT, refreshed every 12 months, to have a self-harm</p> <p>19 strategy, which I understand G4S did have that strategy,</p> <p>20 an anti-bullying strategy was also under 14 of</p> <p>21 schedule D. So those were the laid-out procedures that</p> <p>22 they had to have in place.</p> <p>23 Q. So, for example, the inquiry has obviously seen some</p> <p>24 incidents of self-harm which were recorded during the</p> <p>25 relevant period. So, for example, there is one occasion</p> <p style="text-align: center;">Page 156</p>

<p>1 where there was an alleged failure to remove a ligature</p> <p>2 in time when DCO and DCM entered the room. Would that,</p> <p>3 in your mind, qualify as a failure to follow laid-down</p> <p>4 procedures?</p> <p>5 <b>A. I think -- so in my mind, reading this now, and, to be</b></p> <p>6 <b>fair, it was the same back then, so if someone had</b></p> <p>7 <b>self-harmed, for example, and the officers were aware of</b></p> <p>8 <b>that self-harming, and hadn't opened the appropriate</b></p> <p>9 <b>document, chances are it probably would have been an</b></p> <p>10 <b>ACDT if they self-harmed and not a raised awareness</b></p> <p>11 <b>document. It would have been ACDT. If they'd</b></p> <p>12 <b>self-harmed, hadn't opened an ACDT, hadn't informed the</b></p> <p>13 <b>Home Office via a Part C that this person's risk has</b></p> <p>14 <b>changed, ie, increased, because he self-harmed --</b></p> <p>15 Q. Any of them would be a failure, wouldn't they? Failure</p> <p>16 to open an ACDT --</p> <p>17 <b>A. If that person then went on to self-harm again and the</b></p> <p>18 <b>ACDT document hadn't been opened, then that would, in my</b></p> <p>19 <b>eyes, be a clear failure to follow laid-down procedures.</b></p> <p>20 Q. What about failure to remove a ligature in time?</p> <p>21 <b>A. If the person -- well, again, it's not that</b></p> <p>22 <b>straightforward, is it? It's a fairly complex</b></p> <p>23 <b>environment. If the person was on a constant</b></p> <p>24 <b>supervision and he managed to self-ligature, then</b></p> <p>25 <b>I think there probably would be a discussion about how</b></p> <p style="text-align: center;">Page 157</p>	<p>1 <b>A. So in an instance of self-harm, we would probably ask,</b></p> <p>2 <b>"Were they on an ACDT? Were they on any sort of plan?".</b></p> <p>3 <b>The answer might be, "No, but they are now. We have</b></p> <p>4 <b>opened an ACDT in light of this incident", but the -- in</b></p> <p>5 <b>terms of when they come through reception, they would</b></p> <p>6 <b>have had, like, a risk assessment done, they would have</b></p> <p>7 <b>had a healthcare screening, those sorts of risks may</b></p> <p>8 <b>have highlighted someone who was at harm.</b></p> <p>9 Q. Just to make sure we are clear about what the question</p> <p>10 is. You have got, in a month, 14 incidents of</p> <p>11 self-harm, at least three of which involved injury. In</p> <p>12 each of those, even just the three occasions, did G4S</p> <p>13 present you with those three occasions to say, "These</p> <p>14 people have self-harmed resulting in healthcare</p> <p>15 intervention. Here is our paperwork. Mr Gasson, you</p> <p>16 now go and check whether there's been a failure to</p> <p>17 follow procedures"?</p> <p>18 <b>A. No, they didn't, no.</b></p> <p>19 Q. So you had to rely on them identifying their own failure</p> <p>20 to follow procedures?</p> <p>21 <b>A. I don't think it is as clear as that if you look at</b></p> <p>22 <b>schedule D. It wasn't a case --</b></p> <p>23 Q. I'm looking at schedule G at the moment because this</p> <p>24 is --</p> <p>25 <b>A. Sorry, schedule D, I meant.</b></p> <p style="text-align: center;">Page 159</p>
<p>1 <b>that person managed to self-ligature if he was under</b></p> <p>2 <b>constant supervision.</b></p> <p>3 Q. What about if somebody fell asleep when they were doing</p> <p>4 constant observations and somebody self-harmed?</p> <p>5 <b>A. Well, if they were on a constant supervision and the</b></p> <p>6 <b>person fell asleep and that information came through to</b></p> <p>7 <b>the Home Office, then I would imagine we would be</b></p> <p>8 <b>looking at that untoward event, (c).</b></p> <p>9 Q. In terms of what would come to you, is it correct that</p> <p>10 it was G4S's responsibility to say to you, "We have had</p> <p>11 an occasion where there's been self-harm requiring</p> <p>12 healthcare intervention which has involved a failure of</p> <p>13 procedure", it is a self-reporting mechanism?</p> <p>14 <b>A. Yes.</b></p> <p>15 Q. So -- but what we know is that, during the relevant</p> <p>16 period, there was around 60 incidents of self-harm. For</p> <p>17 example, in July 2017, there were 14 acts. We know at</p> <p>18 least three of them required treatments. So that means</p> <p>19 the first few bits of this, so known incident of</p> <p>20 deliberate self-harm resulting in physical injury</p> <p>21 requiring any form of healthcare intervention.</p> <p>22 In those circumstances, are you checking whether</p> <p>23 there has been a failure to follow laid-down procedures</p> <p>24 in each case or only if they tell you that there's been</p> <p>25 a failure to follow laid-down procedures?</p> <p style="text-align: center;">Page 158</p>	<p>1 Q. I know, but I'm looking at schedule G at the moment</p> <p>2 because, as you will be aware, Mr Gasson, what we have</p> <p>3 is a five-month period that this inquiry is looking at</p> <p>4 where there were zero penalties under this term of</p> <p>5 the contract?</p> <p>6 <b>A. Yes.</b></p> <p>7 Q. And so, clearly, G4S never reported to you that there</p> <p>8 had been anything falling within paragraph (c) here.</p> <p>9 What we want to understand is whether you proactively</p> <p>10 checked that that was correct or whether you relied on</p> <p>11 them not telling you that there was anything under here?</p> <p>12 <b>A. So I think what you're asking me -- and correct me if</b></p> <p>13 <b>I am wrong because I'm struggling to understand the</b></p> <p>14 <b>question, so ... you're saying, if someone has reported</b></p> <p>15 <b>to self-harm and a Part C came through to say, "Mr X has</b></p> <p>16 <b>self-harmed and an ACDT has been opened", would I go</b></p> <p>17 <b>back to check to see if there was any other information</b></p> <p>18 <b>on that person that may have indicated that he may have</b></p> <p>19 <b>self-harmed and an ACDT should have been opened earlier?</b></p> <p>20 Q. Or any failure to follow procedures?</p> <p>21 <b>A. Only that all officers were trained in ACDT, all</b></p> <p>22 <b>officers had 12-month refresher training in ACDT, so</b></p> <p>23 <b>were able to open an ACDT if they should observe or have</b></p> <p>24 <b>had any interaction with someone in the centre, they</b></p> <p>25 <b>identified, perhaps, a vulnerability in that person and,</b></p> <p style="text-align: center;">Page 160</p>



<p>1 rather than jumping straight to an ACDT, they might open</p> <p>2 what was called a RAS(?), a raised awareness. But, did</p> <p>3 I go back, did I ask them --</p> <p>4 Q. In each case --</p> <p>5 A. I haven't seen any information that this person was</p> <p>6 vulnerable before he self-harmed --</p> <p>7 Q. That's not what I'm asking you. I'm asking you, in each</p> <p>8 case of self-harm where there is healthcare</p> <p>9 intervention -- you're told about that. The Home Office</p> <p>10 are told about each case of self-harm?</p> <p>11 A. Yes, of course.</p> <p>12 Q. So in each case, as compliance contract manager, do you</p> <p>13 check whether there has been a breach of the contract or</p> <p>14 not or do you wait for G4S to tell you whether there's</p> <p>15 been a breach of the contract?</p> <p>16 A. We would -- of course, yes, I would check if there was</p> <p>17 a breach of the contract.</p> <p>18 Q. How did you do that?</p> <p>19 A. For self-harm resulting in injury?</p> <p>20 Q. Yes.</p> <p>21 A. I don't know, to be honest with you. I don't know if we</p> <p>22 did. I don't remember doing that. But -- an act of</p> <p>23 self-harm -- I don't think it's worded very well.</p> <p>24 I think that's -- it is a strange performance measure</p> <p>25 because the laid-down procedures as set out in</p> <p style="text-align: center;">Page 161</p>	<p>1 I think the document is in here somewhere. So right --</p> <p>2 you know, right from the basics, from sort of G4S having</p> <p>3 a secure email address, which was an issue on there for</p> <p>4 a long time because it meant that we struggled to email</p> <p>5 them stuff in confidence, and then the more -- the more</p> <p>6 contract monitoring things was things like IT issues, so</p> <p>7 allowing people to be able to use IT, the rooms, the</p> <p>8 regime, having an art teacher. There was a period of</p> <p>9 time when there was no art teacher, and that was</p> <p>10 a stand-alone role. When I went around the centre and</p> <p>11 spoke to Seb, who was the English teacher, which was</p> <p>12 the classroom opposite the arts and crafts teacher, he</p> <p>13 was very enthusiastic and it was a shame the arts and</p> <p>14 crafts classroom wasn't opened for a period of time, but</p> <p>15 G4S got around that by putting a DCO in there. So, for</p> <p>16 a period of time, it was making sure that arts and craft</p> <p>17 centre was opened. Obviously, the cleanliness issues</p> <p>18 which I raised --</p> <p>19 Q. It's the sort of stuff you were looking at --</p> <p>20 A. Bringing people up to see immigration officials within</p> <p>21 30 minutes, making sure that the -- on reception, that</p> <p>22 people were being fingerprinted, so if the IABS machine,</p> <p>23 which is in reception, which I think is the Immigration</p> <p>24 and Asylum Biometric System, which is sent to you when</p> <p>25 someone comes in, to take their fingerprints. So, as</p> <p style="text-align: center;">Page 163</p>
<p>1 schedule D are clear in that they are ACDT, self-harm</p> <p>2 strategy, refresher training, anti-bullying structure,</p> <p>3 which they had. They were the laid-down procedures. So</p> <p>4 unless maybe -- if officers -- maybe an officer who was</p> <p>5 on the wing who had gone over the 12-month ACDT</p> <p>6 refresher and had interaction with that person and</p> <p>7 hadn't opened an ACDT, then perhaps yes.</p> <p>8 Q. You're giving me an example --</p> <p>9 A. I didn't go back and check I think is the answer you're</p> <p>10 probably looking for.</p> <p>11 Q. Moving on, just very briefly, on the contract review</p> <p>12 meetings. You say in your statement that your role</p> <p>13 involved chairing weekly, monthly and quarterly meetings</p> <p>14 at least at one point.</p> <p>15 A. Yes.</p> <p>16 Q. Is it correct that, as at 2017, you were only chairing</p> <p>17 the weekly meetings?</p> <p>18 A. Yes.</p> <p>19 Q. You say in your second statement that those weekly</p> <p>20 meetings were effective in driving forward improvements</p> <p>21 to meet contract requirements and remedy some of</p> <p>22 the outstanding issues, and were useful at keeping focus</p> <p>23 on areas you wanted to see improvement on. What areas</p> <p>24 was it that you wanted to see improvement on?</p> <p>25 A. So there was a variety of issues which came up, and</p> <p style="text-align: center;">Page 162</p>	<p>1 part of the reception process, if people were coming in</p> <p>2 from, say, the prison estate and it was the first time</p> <p>3 into the IRC estate, the expectation would be their</p> <p>4 fingerprints would be taken in reception. We would get</p> <p>5 the reception paperwork. It would come up. If there</p> <p>6 were fingerprints missing, we would chase those</p> <p>7 fingerprints. So that would sometimes go on there.</p> <p>8 Passport quality photos --</p> <p>9 Q. Mr Gasson, sorry, we are limited on time, so I need to</p> <p>10 interrupt you. But -- so what you are saying is those</p> <p>11 were the types of things that you would raise at the</p> <p>12 weekly meetings and --</p> <p>13 A. Amongst others, yes.</p> <p>14 Q. Moving on to staffing levels, in your first statement,</p> <p>15 you say that you'd questioned the level of staffing if</p> <p>16 they fell below the minimum --</p> <p>17 A. That's right.</p> <p>18 Q. -- and ask what contingency plans were in place or plans</p> <p>19 in motion for things like the welfare office or ACDT</p> <p>20 reviews and constant watches?</p> <p>21 A. Mmm.</p> <p>22 Q. Is that about whether staffing was below the minimum</p> <p>23 over a 24-hour period or was it over a longer period</p> <p>24 that you'd be looking at?</p> <p>25 A. Both --</p> <p style="text-align: center;">Page 164</p>

1 Q. Okay.

2 **A. -- I think.**

3 Q. If we can bring up on screen, please, <CJS000524>. This

4 is a table setting out some of the penalty points, the

5 points that -- some of the points under the contract.

6 You will see row 16 there deals with staffing levels,

7 and what you will see, looking across, is that it was

8 staffing levels were 100 per cent in April and May 2017,

9 and then go down below the minimum levels thereafter, so

10 90 per cent, 81 per cent, 87.1, and so forth.

11 To the best of your recollection, this drop-off in

12 staffing levels meeting the minimum requirements, this

13 coincided with Tinsley House re-opening? Do you

14 remember that?

15 **A. Yes. Because it was Tinsley staff, wasn't it, that came**

16 **across to --**

17 Q. Tinsley had been closed for refurbishment and Tinsley

18 staff had come over.

19 **A. Yes.**

20 Q. Then, in around May 2017, Tinsley House re-opened and so

21 staff went back to Tinsley House?

22 **A. Yes.**

23 Q. This was also around the time of the introduction of

24 60 additional beds at Brook House. Do you remember

25 that?

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1 **A. I do, yes.**

2 Q. So both of those things happening around the same time,

3 as you can see, made staffing levels go below the

4 minimum consistently from June 2017 until November 2017

5 at least?

6 **A. Yeah, sure.**

7 Q. Were you aware of this at the time, as a pattern?

8 **A. As a pattern?**

9 Q. Yes.

10 **A. I've never looked at it like this in terms of, you know,**

11 **you can see the dip and then it sort of gradually goes**

12 **up again, but the staffing figures -- we were aware of**

13 **the staffing figures because we counted them and we made**

14 **sure that they matched what G4S were telling us.**

15 Q. If we can get up on screen, please, <VER000256>, this is

16 your Verita interview. If we can turn to page 9,

17 please, you say at paragraph 111 at the bottom -- we are

18 talking about the Tinsley House refurbishment. You were

19 asked at 112 that, since then, staffing has apparently

20 been pretty tight, is that fair, and you say yes, and

21 then, if we go to page 10, please, paragraph 117, you

22 were asked about the number of DCOs and DCMs on the

23 wing, and you say:

24 "Anecdotally, staff say 'One's been put on for

25 escort, one's in the courtyard and that leaves me. The

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1 officer is talking on the wing with detainees answering

2 questions'. That's anecdotal. I don't physically have

3 the evidence to say it went down to one between these

4 hours."

5 So what you are saying here -- correct me if I am

6 wrong -- is that you had heard people saying that there

7 had, on occasions, been just one DCO or DCM left on

8 a wing; is that right?

9 **A. On occasion, yes.**

10 Q. What did you do when you were told this?

11 **A. That would have been probably raised with G4S in the**

12 **weekly meetings. I would have said that, you know,**

13 **I understand sometimes the wings go down to one.**

14 Q. Was it acceptable for G4S to have one member of staff on

15 the wing?

16 **A. Was it acceptable for G4S?**

17 Q. Well, was it acceptable for you --

18 **A. For me to know that it was one on there? No. But**

19 **I reported the figures. I didn't necessarily have those**

20 **conversations with G4S about, you know, the -- for**

21 **example, you know, the unacceptability of not having the**

22 **correct number of DCOs on a wing if there was a correct**

23 **number.**

24 Q. So in your second statement, you say that the

25 Home Office were aware of staffing levels, but there was

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1 an understanding of the difficulties in recruiting and

2 the increase in bed capacity, and you say that you don't

3 recall the specifics of any impact on staff or detainees

4 as a result of low staffing levels. Now, we have heard

5 over the past couple of weeks evidence from a number of

6 former DCOs and DCMs, many of whom have said that

7 staffing levels were too low, that it led to detainees

8 and staff feeling unsafe?

9 **A. Yes.**

10 Q. That it led to very poor staff morale, one described

11 staff morale as an "abyss" because of it, and said --

12 and some of those staff said that those staffing levels

13 affected the care of detained people. Now, is it your

14 evidence that you were unaware of these issues at the

15 time?

16 **A. I was aware -- I was unaware of what you have just said,**

17 **yes. I mean, that's becoming more apparent now. That**

18 **was quite well, for want of a better word, hidden from**

19 **me. We were aware that the minimum staffing figures**

20 **were below the expectation, and bearing in mind they are**

21 **just minimum staffing figures. That was the minimum**

22 **staffing figures set in the contract to run the centre.**

23 **There was nothing to say that G4S could -- you know,**

24 **could have more staff than the minimum staff**

25 **requirements.**

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42 (Pages 165 to 168)

<p>1 Q. Does that follow logically, Mr Gasson, that if you have 2 got a minimum level of staffing in a contract to care 3 for detained people, that if you fall below that, that 4 that's going to affect the care of those detained 5 people? 6 <b>A. It probably would.</b> 7 Q. Who was responsible from the Home Office for saying, 8 "That's not good enough, G4S. You need to have enough 9 staff"? 10 <b>A. Well, from my level, it would be the performance 11 measures. So --</b> 12 Q. But who is responsible? 13 <b>A. For ...?</b> 14 Q. For saying to G4S that this is not good enough, "You 15 need more staff"? 16 <b>A. Well, I mean, I don't -- to blame it -- to put it at 17 anyone's feet, but I imagine the delivery service 18 manager had meetings and had, you know, talks with G4S 19 about their response and their recruitment methods and 20 what their -- you know, any sort of plans they had to 21 try and increase their staffing. I mean --</b> 22 Q. Sorry to interrupt you again, so are you saying that the 23 responsibility was above you because your responsibility 24 was just to report the staffing levels? 25 <b>A. To a degree, yes, of course I did report the staffing</b></p> <p style="text-align: right;">Page 169</p>	<p>1 <b>A. It set a minimum level of staffing.</b> 2 Q. Yes. 3 <b>A. It didn't set the minimum level of staffing on the wing. 4 That's not in the contract.</b> 5 Q. We know it was below the minimum levels of staffing. 6 You knew at the time they were below the minimum levels 7 of staffing. So wasn't it your job to take action or 8 was it just to charge penalty points? 9 <b>A. Obviously, it was to put the performance measures 10 across, so what the staffing figures showed and there 11 was obviously a table with certain percentages and where 12 it hit certain levels, a level of performance points 13 would then be awarded. And then it was down to G4S. 14 G4S had the responsibility, in this contract, to make 15 sure that they were hitting minimum staffing levels.</b> 16 Q. We know that in your -- we don't need to go to the -- 17 actually, it is right on this page, so while we are 18 here. At lines 118 to 119, you were asked whether G4S 19 would incur any fines over staffing and you say: 20 "Yes ... they weren't massive." 21 Without going to each of the documents, our analysis 22 of the penalties that were levied at G4S during the 23 relevant period was that it was around £2,250 over three 24 months. 25 <b>A. Okay.</b></p> <p style="text-align: right;">Page 171</p>
<p>1 <b>figures and it was sort of reported monthly -- in fact, 2 we worked on the staffing figures every day. But the 3 assurances, from my memory, from my recollection, of 4 monthly contract review meetings, from quarterly 5 contract review meetings, chaired by, you know, the 6 service delivery manager and commercial respectively, 7 was that staffing was talked about and G4S did speak 8 about a recruitment drive to try and bring people in. 9 Did the question around the welfare of people detained 10 affected by that? I don't believe it -- I don't 11 remember a conversation where that came up.</b> 12 Q. Do you think you and your colleagues missed it? 13 <b>A. I don't know if it was missed, as such.</b> 14 Q. Well, we have heard evidence from a number of -- you 15 have seen some of it. I mean, we have heard evidence 16 from a number of staff members about this being a really 17 central theme of their day-to-day life at Brook House -- 18 <b>A. Yeah, sure.</b> 19 Q. -- was that staffing was always too low and it meant 20 that they would be looking after the wing by themselves, 21 it meant they couldn't open the courtyard in time, it 22 meant there was no-one to do activities with the 23 detained people. You were monitoring the contract which 24 set a minimum level of staffing. So wasn't it your 25 job --</p> <p style="text-align: right;">Page 170</p>	<p>1 Q. From June/July/August 2017, it was £2,250. Stepping 2 back from it, Mr Gasson, you have heard some of 3 the evidence from G4S staff about how terrible the 4 situation was with staffing. 5 <b>A. Sure.</b> 6 Q. And I'm telling you that the penalties were around 7 £2,250. What do you make of that, stepping back from 8 it? Was that enough? 9 <b>A. Well, obviously, as I say in my statement, there was 10 a balance to a point where it would be obviously less 11 expensive for G4S not to recruit, although they were 12 actively recruiting, because I know that. I think, in 13 my first or second statement, I used to go along to the 14 new DCO part of the ITC and do a presentation. So they 15 were pretty much back-to-back recruiting, so that was 16 going on. The problem was staff attrition. In answer 17 to your question, about -- what was it? I forget. I'm 18 so sorry.</b> 19 Q. We have heard evidence from lots of staff members about 20 how awful staffing levels were and about the impact this 21 had on staff, on detainees. 22 <b>A. Yes.</b> 23 Q. And the fines that the Home Office levied or the 24 penalties that the Home Office levied were £2,250. 25 <b>A. Sure.</b></p> <p style="text-align: right;">Page 172</p>

43 (Pages 169 to 172)

<p>1 Q. What I'm suggesting to you is, does that either mean</p> <p>2 that the staffing levels in the contract that were</p> <p>3 specified were too low already, or does it mean that the</p> <p>4 penalties were too low, or does it mean neither of those</p> <p>5 things?</p> <p>6 <b>A. I think the -- I could only work with the framework of</b></p> <p>7 <b>the contract.</b></p> <p>8 Q. Yes.</p> <p>9 <b>A. That was my job.</b></p> <p>10 Q. That's, in your opinion --</p> <p>11 <b>A. That's what I did. The minimum staffing levels were</b></p> <p>12 <b>probably set at a time when perhaps the focus wasn't so</b></p> <p>13 <b>much on welfare as it is now. I think, on reflection,</b></p> <p>14 <b>if it was done again, and it has been done again</b></p> <p>15 <b>recently, you can see the increase in staffing. That's</b></p> <p>16 <b>evident in the number of staff. And I think</b></p> <p>17 <b>Steve Loughton touched on it in his time here. It is</b></p> <p>18 <b>like a different centre now than it was back then. So</b></p> <p>19 <b>that wasn't the only area that G4S could be performance</b></p> <p>20 <b>measured. Sorry, that was the first step. In</b></p> <p>21 <b>schedule G there's also an area where there could be</b></p> <p>22 <b>a notice of improvement.</b></p> <p>23 Q. Did that -- that never happened during the relevant</p> <p>24 period?</p> <p>25 <b>A. Not as far as I was -- that would have been</b></p> <p style="text-align: center;">Page 173</p>	<p>1 <b>A. I don't remember it. But if I put it in the statement,</b></p> <p>2 <b>then -- I mean, I don't think I did formally, no. But</b></p> <p>3 <b>I thought the SMT was fairly -- was quite small for the</b></p> <p>4 <b>area that they had to cover. I'm not sure if that was</b></p> <p>5 <b>my position to say that, to be honest.</b></p> <p>6 Q. Well, you were the contract monitor, so you were</p> <p>7 monitoring the extent to which G4S met the terms of</p> <p>8 the contract. So if that was something -- you were the</p> <p>9 most senior person on the ground at Brook House from the</p> <p>10 Home Office perspective. So if not you, then who?</p> <p>11 <b>A. But the number of senior management -- the number in the</b></p> <p>12 <b>senior management team wasn't part of it -- of</b></p> <p>13 <b>the contract. It didn't say you had to have X amount of</b></p> <p>14 <b>SMT. These areas had to be covered. G4S decided their</b></p> <p>15 <b>own senior management team. They decided how they</b></p> <p>16 <b>thought best to deliver the service in line with all the</b></p> <p>17 <b>statutory instruments, DSOs and the contract. And it's</b></p> <p>18 <b>their decision to have -- I don't know how many SMTs</b></p> <p>19 <b>they had, but sometimes it felt quite short. Especially</b></p> <p>20 <b>the residential manager. He had a very big area to</b></p> <p>21 <b>cover.</b></p> <p>22 Q. That's Jules Williams?</p> <p>23 <b>A. Yeah, I thought he was fairly effective, but he had such</b></p> <p>24 <b>a big area to cover, a 24-hour-a-day, seven-day-a-week</b></p> <p>25 <b>centre. For one person to cover that, I thought that</b></p> <p style="text-align: center;">Page 175</p>
<p>1 <b>a commercial-led thing. That would have been for</b></p> <p>2 <b>a higher executive officer working in an IRC who was</b></p> <p>3 <b>monitoring the contract. That wouldn't have been for me</b></p> <p>4 <b>to raise or certainly to get the go-ahead to do that.</b></p> <p>5 <b>I could have raised it as a suggestion. Of course</b></p> <p>6 <b>I could.</b></p> <p>7 Q. But you didn't?</p> <p>8 <b>A. I didn't at that time, no. Obviously, there is another</b></p> <p>9 <b>step as well as part of the contract.</b></p> <p>10 Q. One of the things you do say, talking about the levels</p> <p>11 of senior management, you say in your statement that</p> <p>12 your opinion was that the G4S senior management team was</p> <p>13 under-resourced for certain areas, but that wasn't an</p> <p>14 opinion you shared formally. Why didn't you share that</p> <p>15 opinion formally?</p> <p>16 <b>A. I think when you say "formally", is it in writing?</b></p> <p>17 Q. You say "formally".</p> <p>18 <b>A. Oh, okay. In that case, then, is that an interview with</b></p> <p>19 <b>Kate Lampard.</b></p> <p>20 Q. No, in your witness statement to this inquiry,</p> <p>21 paragraph 29, first statement.</p> <p>22 <b>A. So by that, then, I'm sure I meant that I didn't put it</b></p> <p>23 <b>in writing, but I may have raised it with maybe Ben or</b></p> <p>24 <b>Steve.</b></p> <p>25 Q. You're saying you may have done. Did you?</p> <p style="text-align: center;">Page 174</p>	<p>1 <b>was quite a stretch for any person.</b></p> <p>2 Q. I want to move on to the issue of rule 35s, Mr Gasson.</p> <p>3 Your role in rule 35s, you say in your statement, was</p> <p>4 that you ensured that the rule 35 process was completed</p> <p>5 through every case from the Home Office perspective;</p> <p>6 yes?</p> <p>7 <b>A. (Witness nods).</b></p> <p>8 Q. Is that right?</p> <p>9 <b>A. Say that again, sorry?</b></p> <p>10 Q. Your role, in terms of rule 35s, was ensuring that the</p> <p>11 Home Office side of it was completed in every case?</p> <p>12 <b>A. Yes -- the Home Office side within the IRC</b></p> <p>13 <b>responsibilities, yes.</b></p> <p>14 Q. So you say that this involved passing completed rule 35s</p> <p>15 from healthcare immediately to the caseworker --</p> <p>16 <b>A. Yes.</b></p> <p>17 Q. -- updating CID, adding the details to a whiteboard in</p> <p>18 the immigration office --</p> <p>19 <b>A. Yes.</b></p> <p>20 Q. -- and a rule 35 spreadsheet --</p> <p>21 <b>A. Yes.</b></p> <p>22 Q. -- and ensuring that each case was dealt with promptly?</p> <p>23 <b>A. That's right, yes.</b></p> <p>24 Q. How would you be notified in the first place that</p> <p>25 rule 35 had been completed from healthcare?</p> <p style="text-align: center;">Page 176</p>

<p>1 A. It used to come through as a fax and then it later came 2 through as an email transmission.</p> <p>3 Q. Would you -- so that's it coming in to you. You then 4 pass it on to the caseworker. The caseworker makes the 5 decision about whether the detainee should be released 6 in response to it?</p> <p>7 A. They would carry out a detention review, yes.</p> <p>8 Q. Would you review the substance of the responses?</p> <p>9 A. Yes. So at the time, the process was the immigration 10 team, so the contact management team, would receive that 11 notification from healthcare. They would pass it to 12 casework and then do all the bits that you just said, 13 update the spreadsheet, update the whiteboard. If 14 a response hadn't been received within 48 hours, they 15 would chase the caseworker or escalate it to the manager 16 to make sure that a response came through to us. Then, 17 depending on the response, one of the parts of 18 the process was that the HEO, so myself, would have 19 a look at the response to see if it had considered what 20 was in the rule 35 report.</p> <p>21 Q. So you would review the adequacy of the response?</p> <p>22 A. As far as I was able, yes. Yes. I mean, if I -- if the 23 rule 35 report, you know, said X, Y, Z and the 24 caseworker had only considered X and Y, I might say 25 "Ring the caseworker up, they need to resubmit it" or</p> <p style="text-align: center;">Page 177</p>	<p>1 front of them. If the caseworker -- and this didn't 2 happen often, but when it did -- you know, if it did 3 happen, if all the caseworker had done was literally 4 just change the date and sign at the bottom, there would 5 be no progress on the case to reflect what actually 6 happened in the last 28 or 30 days, so we would make 7 sure that that would go back because we wanted a proper 8 update for the person receiving it.</p> <p>9 Q. What I want to understand is, if there is criticism of 10 a response to the rule 35 report, do you bear any 11 responsibility for that or is that a responsibility 12 that's held by the caseworker team?</p> <p>13 A. I mean, the responsibility sits with the caseworker 14 team; however, I do take some responsibility, yes, 15 because if I had viewed a rule 35 response and HMIP had 16 viewed a rule 35 response and they had thought it was 17 inadequate, then I would need to know that. I would 18 need to perhaps know where those failings were, so that, 19 later on, I could make sure that I covered those points.</p> <p>20 Q. We have heard from two GPs who worked at Brook House, 21 they still work at Brook House. I don't know if you saw 22 their evidence: Dr Oozeerally and Dr Chaudhary. They 23 gave evidence that they wouldn't just use rule 35 to 24 notify the Home Office about Adults at Risk.</p> <p>25 A. Okay.</p> <p style="text-align: center;">Page 179</p>
<p>1 "Why was it missed off?", for example, "Was there 2 a reason for that?".</p> <p>3 Q. Were you aware, in 2016, of the HMIP report about 4 Brook House which expressed the view that some of 5 the Home Office's rule 35 responses were poor?</p> <p>6 A. No.</p> <p>7 Q. Was that ever passed to you?</p> <p>8 A. I didn't see that part of the HMIP report, no.</p> <p>9 Q. So you wouldn't have taken any action in response to 10 that. Would that have been the caseworker team who 11 would be responsible for considering that?</p> <p>12 A. Yeah, I mean, yeah, they would have written the rule 35 13 response and I'm -- I mean, I have to check, but I'm 14 sure it was quality checked their end as well before it 15 then came through for service and it was there, really, 16 as more of a safeguard. So, I mean, I wasn't there 17 every day, I didn't work there seven days a week, so 18 there would have been responses that came through and 19 sometimes I worked weekends which meant that I had a day 20 off in lieu either side of that weekend, so there 21 wouldn't have been time. But it should have been 22 checked, a bit like the detention reviews. Sometimes 23 they would be sent back by our -- by the immigration 24 staff at the IRC simply because they would be going down 25 and they would be serving that document on the person in</p> <p style="text-align: center;">Page 178</p>	<p>1 Q. They would also use Part C forms if they thought that 2 somebody was at risk.</p> <p>3 A. Yes.</p> <p>4 Q. Would you follow the same process upon receipt of 5 a Part C as you would a rule 35 or was there a different 6 process?</p> <p>7 A. So the rule 35 prompted a detention review from the 8 caseworker. A Part C was a change in that person's 9 risk. So if it came from healthcare, or a GP, depending 10 on what the information said on the Part C -- all 11 Part Cs would go to the caseworker and they should react 12 to the information on the Part C.</p> <p>13 Q. But it wouldn't prompt -- are you saying, as far as 14 you're aware, it wouldn't prompt a detention review in 15 the same way?</p> <p>16 A. Not in every single case, no. It depends on the 17 information in the Part C.</p> <p>18 Q. We heard from those healthcare witnesses, and we also 19 heard from the healthcare manager, Sandra Calver, and 20 some other witnesses, that during the relevant period -- 21 were you aware of the three different types of rule 35 22 reports that there could be?</p> <p>23 A. Yeah, (1), (2) and (3) are the limbs of the rules, 24 I think.</p> <p>25 Q. I'm not going to quiz you on it. Were you aware that,</p> <p style="text-align: center;">Page 180</p>

<p>1 during the relevant period, there were no rule 35(2)</p> <p>2 reports and only a small number of rule 35(1) reports?</p> <p>3 Is that something you would have had any oversight of?</p> <p>4 <b>A. No, I wasn't aware of that. Most of them were</b></p> <p>5 <b>rule 35(3), which was torture or special (inaudible).</b></p> <p>6 Q. Indeed. What I want to understand is, from the</p> <p>7 Home Office's perspective, and I know that you have</p> <p>8 a limited role in this, but you have some role in it,</p> <p>9 who is responsible within the Home Office for thinking,</p> <p>10 "Wait a minute, we have received no rule 35(1) reports</p> <p>11 or no rule 35(2) reports in five months. What's going</p> <p>12 on here?" Whose role was that? Whose job was that?</p> <p>13 <b>A. I don't know. I don't know if there is one. There is</b></p> <p>14 <b>a rule 35 team now that was set up, I think, either</b></p> <p>15 <b>following -- it may have been Stephen Shaw's report.</b></p> <p>16 <b>I'm not 100 per cent sure. Part of the detention</b></p> <p>17 <b>gatekeeping team, I think, but I'm not really kind of in</b></p> <p>18 <b>a position to give sort of information on that because</b></p> <p>19 <b>I don't know the full ins and outs so it wouldn't be</b></p> <p>20 <b>fair. I am aware there is a rule 35 team now</b></p> <p>21 <b>specifically dedicated.</b></p> <p>22 Q. Just a couple of other things on this -- related to this</p> <p>23 issue. Karen Churcher, who was a nurse at Brook House,</p> <p>24 told us last week that, in her opinion, a lot of mental</p> <p>25 health was not taken seriously by the Home Office, she</p> <p style="text-align: center;">Page 181</p>	<p>1 of your team in the complaint process, which was</p> <p>2 primarily, I think, to ensure that there were sufficient</p> <p>3 complaint forms and then to collect the complaints and</p> <p>4 pass them on?</p> <p>5 <b>A. That's right, yes.</b></p> <p>6 Q. Part of your role also included dip sampling complaint</p> <p>7 responses; is that right?</p> <p>8 <b>A. That's right, yes.</b></p> <p>9 Q. Is that just the responses where G4S investigate</p> <p>10 themselves or is that dip sampling responses including</p> <p>11 where it goes to the PSU as well?</p> <p>12 <b>A. No, the PSU wasn't included as part of the -- it was</b></p> <p>13 <b>very low. It was like 5 per cent. So sometimes it</b></p> <p>14 <b>would have to be more than 5 per cent because there</b></p> <p>15 <b>might be only sort of ten responses that month, so</b></p> <p>16 <b>almost pointless doing one response. But, no, it didn't</b></p> <p>17 <b>include the PSU responses.</b></p> <p>18 Q. Did anyone from the Home Office review each complaint</p> <p>19 that G4S responded to or was it just the dip sampling?</p> <p>20 Was that the only review from the Home Office's</p> <p>21 perspective?</p> <p>22 <b>A. I don't know, actually, what was in place. I don't know</b></p> <p>23 <b>if maybe what is now known as the corporate oversight</b></p> <p>24 <b>and operational team, if they had -- if they did any</b></p> <p>25 <b>analysis back then on themes or types of complaints or</b></p> <p style="text-align: center;">Page 183</p>
<p>1 said, I think. Is that something that you felt was the</p> <p>2 case within the Home Office?</p> <p>3 <b>A. No. How does she mean? How do you mean? How would the</b></p> <p>4 <b>Home Office not take it seriously? People on site or</b></p> <p>5 <b>the caseworkers?</b></p> <p>6 Q. I'm just putting to you what she said. Do you disagree</p> <p>7 with that?</p> <p>8 <b>A. I disagree with that. I don't know what she means by</b></p> <p>9 <b>that.</b></p> <p>10 Q. Do you think, personally, you took the mental health of</p> <p>11 detainees seriously?</p> <p>12 <b>A. Of course, yes. I don't know in what context we</b></p> <p>13 <b>wouldn't take it seriously.</b></p> <p>14 Q. Karen Churcher also told us about people from the</p> <p>15 Home Office telling people who were suspected to have</p> <p>16 suicidal ideation or who were self-harming that they</p> <p>17 would be better off in detention rather than being</p> <p>18 released from detention. Did you ever tell a detainee</p> <p>19 that?</p> <p>20 <b>A. No.</b></p> <p>21 Q. Did you ever hear of someone from the Home Office</p> <p>22 telling a detainee that?</p> <p>23 <b>A. No.</b></p> <p>24 Q. I want to come on to the issue of complaints now,</p> <p>25 Mr Gasson. You set out in your first statement the role</p> <p style="text-align: center;">Page 182</p>	<p>1 <b>if any sort of report was generated. So I don't know.</b></p> <p>2 Q. I don't want you to speculate on that. But from your</p> <p>3 perspective, in your team, was anyone stepping back and</p> <p>4 considering patterns of complains? For example, we</p> <p>5 heard a couple of weeks ago there were 13 complaints</p> <p>6 against a DCO who became a DCM over around a two-year</p> <p>7 period. Was that something that you would have been</p> <p>8 aware of? Would you have stepped back and looked at</p> <p>9 a pattern?</p> <p>10 <b>A. If I'd seen it, it would have raised suspicions and it</b></p> <p>11 <b>would have raised concerns and I would have wondered why</b></p> <p>12 <b>the same officer's name was cropping up in complaints.</b></p> <p>13 Q. I suppose the crucial thing there which you have just</p> <p>14 said is "if I'd have seen it". What I'm asking is, were</p> <p>15 you or any of your colleagues taking steps to see that</p> <p>16 type of thing?</p> <p>17 <b>A. No, is the answer. The way the process worked was --</b></p> <p>18 <b>meant that one of two, sometimes three, people could</b></p> <p>19 <b>have scanned a complaint and sent it through to the</b></p> <p>20 <b>central complaints team, so I think that question might</b></p> <p>21 <b>be better off asked centrally, if you know what I mean.</b></p> <p>22 <b>They might see a theme.</b></p> <p>23 Q. Given the role that you have just set out for you and</p> <p>24 your team in the complaints process, I want to ask you</p> <p>25 about a specific complaint. If we can bring up on</p> <p style="text-align: center;">Page 184</p>

<p>1 screen &lt;CJS001616&gt; at page 3. I'm not going to read 2 through this, Mr Gasson, but this is, to summarise, 3 a complaint from someone who the inquiry knows as D2953. 4 It is a complaint that was made on 23 June 2017 and he 5 complains about being beaten three times by a member of 6 staff and also complains about not being given his 7 medicines. Now, without going through each page, I can 8 tell you that we know from the documents that he 9 received a response in relation to the medicines 10 complaint but didn't receive any response in relation to 11 the allegation of being beaten three times until -- it 12 wasn't investigated until three months later by G4S and 13 it wasn't passed to the Home Office until a month after 14 that, so until October 2017. Ultimately, when this was 15 investigated, the PSU substantiated this complaint, so 16 they found that a staff member had punched this person 17 three times in June 2017. But that staff member 18 remained in employment until September or October 19 because this wasn't investigated. 20 We know from the PSU investigator that she never 21 received a copy of this complaint, even when she was 22 carrying out her investigation. 23 Who is responsible for that failure to pass on this 24 complaint or to investigate this complaint? 25 <b>A. If that complaint was put in the yellow box on one of</b></p> <p style="text-align: center;">Page 185</p>	<p>1 it? Whose fault is it? 2 <b>A. They are the ones who would have read the complaint</b> 3 <b>initially. If it didn't get passed to the right place,</b> 4 <b>then, ultimately, that was part of their role, wasn't</b> 5 <b>it, to pass it to the correct place? If they missed</b> 6 <b>some information which, to be fair, is quite badly -- it</b> 7 <b>is -- you know, the writing is quite scrawly; however,</b> 8 <b>I can clearly see "I was beaten", that would have drawn</b> 9 <b>my attention in if I was looking -- when I used to do</b> 10 <b>that role, I would read the complaints to make sure it</b> 11 <b>was going to the right place. If that definitely came</b> 12 <b>into the immigration office, then it was an oversight by</b> 13 <b>the member of staff. I'm just pleased that, you know,</b> 14 <b>it was rectified and it did come back to us and PSU had</b> 15 <b>the opportunity to look into it.</b> 16 Q. I want to briefly ask you about some involvement you had 17 in a complaint ultimately raised by David Waldock. I'm 18 not going to go into this in detail with you because it 19 is going to be discussed later this afternoon. But this 20 arose when a colleague of yours, Vanessa Smith, emailed 21 you saying that DCO Waldock had been really rude to 22 a member of staff, a G4S member of staff, and you passed 23 that on to G4S. Do you remember this? 24 <b>A. Yes. I remember it because I've seen the email, yes.</b> 25 Q. Then if we have up on screen just briefly, please,</p> <p style="text-align: center;">Page 187</p>
<p>1 <b>the residential units and it was collected by</b> 2 <b>a Home Office member of staff, one of the deputy</b> 3 <b>immigration managers which should have read that</b> 4 <b>complaint know that one part of it would have gone to</b> 5 <b>healthcare and part of it should have been sent to the</b> 6 <b>desk complaints team. That should have been -- so they</b> 7 <b>would have probably scanned it and sent it twice. Once</b> 8 <b>to healthcare, as I say, the NHS, and one to --</b> 9 Q. But they didn't, obviously? 10 <b>A. Apparently not.</b> 11 Q. Who is responsible for that? Is it the individual? Is 12 it you? Is it someone more senior? 13 <b>A. I would imagine it was probably the individual. I don't</b> 14 <b>know what part of it they would have read. Maybe they</b> 15 <b>read the first line and saw "doctor" or "medical staff".</b> 16 <b>Maybe they didn't read it all the way through. If I'd</b> 17 <b>known about it, obviously I would have picked them up --</b> 18 Q. Yes, but you understand that we don't know that either 19 because we can't go back in time and see who picked up 20 this complaint. All we know is this is a complaint that 21 wasn't passed on and that this member of staff stayed in 22 post for several months? 23 <b>A. Sure.</b> 24 Q. Are you saying that it would just be a mistake on behalf 25 of the deputy immigration manager? Or whose mistake is</p> <p style="text-align: center;">Page 186</p>	<p>1 &lt;CJS0073634&gt;, this is a chronology of matters, and we 2 can see that -- it has your name at the top, you were 3 emailed, then you emailed Caz Dance-Jones on 25 January 4 and then, further down, 1 February, you sent an email to 5 Ben Saunders saying there was still an issue and 6 providing a list of concerns, and then, on 3 February, 7 it was confirmed to you that DCO Waldock had been moved 8 from visits and was being performance managed. 9 <b>A. Okay.</b> 10 Q. Now, ultimately, the outcome of this was that 11 DCO Waldock raised a grievance and that that grievance 12 found that he had been -- that matter had been poorly 13 handled by G4S and that one of the problems was that 14 when the complaint had been received from the 15 Home Office, from you passing on Vanessa Smith's 16 complaint, they had taken the easy option to move him 17 rather than investigate it themselves. 18 <b>A. Okay.</b> 19 Q. Were you aware of that as an issue? 20 <b>A. No.</b> 21 Q. Did you see yourself as just a sort of post box in this 22 regard? 23 <b>A. I think in this particular one, yes. There was -- the</b> 24 <b>area -- the interview corridor area had become a focus</b> 25 <b>for us in getting people up on time so the Home Office</b></p> <p style="text-align: center;">Page 188</p>

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<p>1 could carry out their -- you know, the work, progress</p> <p>2 cases, et cetera, on behalf of the caseworkers. And</p> <p>3 Caz Dance-Jones was put in by Steve Skitt to oversee the</p> <p>4 area. So she was my go-to, my SPOC, as it were, for</p> <p>5 that area -- single point of contact for that area -- to</p> <p>6 raise any issues. This issue came to me from a member</p> <p>7 of, at that moment in time, maybe part of the pilot team</p> <p>8 Vanessa was on. She emailed me her concerns and</p> <p>9 I passed it to Caz to ask for some reassurance in this</p> <p>10 area around the staffing because there had been problems</p> <p>11 with staffing previously.</p> <p>12 Q. Did you consider this was an example of the Home Office</p> <p>13 pushing G4S to take one side or the other?</p> <p>14 A. No, it was up to them to investigate. They would have</p> <p>15 had their own staffing procedures.</p> <p>16 Q. More broadly in relation to complaints, as you will have</p> <p>17 been aware, as compliance manager, one of</p> <p>18 the performance measures in the contract was about</p> <p>19 substantiated complaints?</p> <p>20 A. Yes.</p> <p>21 Q. Did you think at the time that that created a perverse</p> <p>22 incentive for G4S to not find complaints substantiated?</p> <p>23 A. Quite possibly.</p> <p>24 Q. We have seen examples of PSU reports that were carried</p> <p>25 out following things that were reported during the</p> <p style="text-align: center;">Page 189</p>	<p>1 was mocked by an officer or officers -- I can't remember</p> <p>2 exactly.</p> <p>3 Q. Yes.</p> <p>4 A. And that carried a performance measure of 100 points.</p> <p>5 So although I was asked to mitigate it, I think, at that</p> <p>6 point, because I'd done an internal investigation and</p> <p>7 that person had probably been -- gone down the</p> <p>8 disciplinary route, whatever that was -- I'm assuming</p> <p>9 dismissed because his certification would have been</p> <p>10 suspended anyway, given the behaviour he engaged in,</p> <p>11 they were still pointed. So if it came through the</p> <p>12 official complaints channel, ie, a DCF9 was submitted,</p> <p>13 like this individual did, and it was found to be</p> <p>14 substantiated, then, yes, regardless of if that person</p> <p>15 was dismissed or not, but in that case the expectation</p> <p>16 was that he would be, or she would be.</p> <p>17 Q. Moving on to use of force, if we can have up on screen,</p> <p>18 please, &lt;HOM000916&gt; at page 126, please, this is part of</p> <p>19 schedule D of the contract.</p> <p>20 A. Yes.</p> <p>21 Q. This is the schedule relating to use of force, and just</p> <p>22 at that box that we can see in the top left of</p> <p>23 the screen, the requirement is said:</p> <p>24 "The contractor shall ensure that force is used only</p> <p>25 when necessary to keep a detainee in custody, to prevent</p> <p style="text-align: center;">Page 191</p>
<p>1 relevant period.</p> <p>2 A. Yes.</p> <p>3 Q. Where findings had been made that detainees had been</p> <p>4 assaulted, officers found to have raised their voice to</p> <p>5 detainees, officers sacked for swearing at detainees.</p> <p>6 Would you have expected each of these type of things to</p> <p>7 lead to penalties under the contract for being</p> <p>8 substantiated complaints?</p> <p>9 A. If it was put in as a complaint, then yes.</p> <p>10 Q. Moving on to your knowledge and oversight of use of</p> <p>11 force --</p> <p>12 A. Just on that, if I may, on the issues log, in May '17,</p> <p>13 I think it was, there is an instance of that and it is</p> <p>14 filed under "Other complaint" where someone who engaged</p> <p>15 in paid activity, I think they maybe cleaned, I'm not</p> <p>16 sure. The complaint was twofold. One was about not</p> <p>17 being let out of his room to be able to do his paid</p> <p>18 activity and, therefore, I'm assuming, not getting his</p> <p>19 £1 an hour or just the activity, and one was being</p> <p>20 mocked by members of G4S staff, so DCOs. And on that --</p> <p>21 on the mitigation table, as it went on to be called,</p> <p>22 rather than the issues log, the first part wasn't</p> <p>23 substantiated, but the second part, G4S did an internal</p> <p>24 investigation into that and they found out that that</p> <p>25 complaint was actually true, they found out that person</p> <p style="text-align: center;">Page 190</p>	<p>1 self-harm, violence, the destruction of property and to</p> <p>2 prevent detainees from resisting their own removal or</p> <p>3 physically interfering with the lawful removal of</p> <p>4 another detainee. No more force than necessary will be</p> <p>5 applied."</p> <p>6 So that sets out a list of the circumstances in</p> <p>7 which force can be used on a detainee; yes?</p> <p>8 A. Yes.</p> <p>9 Q. In fact, it says "only", so it is an exhaustive list.</p> <p>10 Would you agree? "Force is used only when necessary</p> <p>11 to"?</p> <p>12 A. Yes, yes.</p> <p>13 Q. Now, we have seen a number of use of force reports from</p> <p>14 the relevant period where the reason for the force used,</p> <p>15 as written on the form, is to maintain good order and</p> <p>16 discipline. That's the reason given for the use of</p> <p>17 force?</p> <p>18 A. Okay.</p> <p>19 Q. Looking at that list there, do you think that</p> <p>20 maintaining good order and discipline falls within any</p> <p>21 of those reasons for the use of force?</p> <p>22 A. On its own, probably not. There should be probably some</p> <p>23 elaboration on that sentence to say exactly what -- you</p> <p>24 know, why use of force was used.</p> <p>25 Q. Your role, as compliance manager, was, I think you told</p> <p style="text-align: center;">Page 192</p>



<p>1 us earlier, not just to look at schedule G, which is the</p> <p>2 bit that attracted performance points, but also to look</p> <p>3 at the extent to which schedule D was met.</p> <p>4 <b>A. Mmm.</b></p> <p>5 Q. This schedule D sets out a load more things in relation</p> <p>6 to use of force. It says all force must be reasonable,</p> <p>7 only approved techniques may be used, planned use of</p> <p>8 force must be recorded and retained on video for three</p> <p>9 months, and various other things. Who from the</p> <p>10 Home Office, if anyone, was checking that that -- that</p> <p>11 all of those things were done each time force was used?</p> <p>12 Was there anyone?</p> <p>13 <b>A. I don't know if it was each time force was used, but</b></p> <p>14 <b>there was a use of force monitor that sat within</b></p> <p>15 <b>detention escorting services as part of the security</b></p> <p>16 <b>team and there was a stand-alone role that was called</b></p> <p>17 <b>use of force monitor.</b></p> <p>18 Q. Whose job was that?</p> <p>19 <b>A. The name?</b></p> <p>20 Q. Yes.</p> <p>21 <b>A. I don't know, I'm sorry.</b></p> <p>22 Q. It wasn't your job. That was someone else's job?</p> <p>23 <b>A. The use of force monitor, yes. So they would have</b></p> <p>24 <b>probably I'm assuming done the use of force -- done the</b></p> <p>25 <b>control and restraint force, be knowledgeable in the</b></p> <p style="text-align: center;">Page 193</p>	<p>1 <b>A. That or a member of staff raising it, which has happened</b></p> <p>2 <b>before, in my experience.</b></p> <p>3 Q. What would be the penalty point then?</p> <p>4 <b>A. Oh, penalty points?</b></p> <p>5 Q. Yes.</p> <p>6 <b>A. No, there wouldn't be a performance measure as such.</b></p> <p>7 <b>G4S might lose an experienced member of staff, but they</b></p> <p>8 <b>wouldn't be awarded a performance point as such because</b></p> <p>9 <b>inappropriate use of force was used by a member of</b></p> <p>10 <b>staff.</b></p> <p>11 Q. Given the seriousness of using force on a detained</p> <p>12 individual, does that strike you as an important gap in</p> <p>13 the contract?</p> <p>14 <b>A. I think so. I think, you know, looking at it -- how use</b></p> <p>15 <b>of force and the nature of the use of force, you know,</b></p> <p>16 <b>the first time you see use of force and I've witnessed</b></p> <p>17 <b>a few in my role, it's quite an alarming experience, the</b></p> <p>18 <b>first time you see it. But I agree that perhaps -- but</b></p> <p>19 <b>I think that may be -- I don't know if it's in the new</b></p> <p>20 <b>contract, but from my point of view, from a contract</b></p> <p>21 <b>monitor point of view, I wouldn't necessarily know --</b></p> <p>22 <b>obviously, if it was obvious, you know, someone was</b></p> <p>23 <b>clearly assaulting someone and that was part of the use</b></p> <p>24 <b>of force report, then yeah, but looking at use of force,</b></p> <p>25 <b>I wouldn't know if certain techniques being used were</b></p> <p style="text-align: center;">Page 195</p>
<p>1 <b>different techniques, and then, if they had concerns,</b></p> <p>2 <b>maybe pass it to an instructor to have a look at as</b></p> <p>3 <b>well. I don't know their procedures.</b></p> <p>4 Q. Now, would you accept that at least during the relevant</p> <p>5 period -- I believe it's changed now -- there were no</p> <p>6 performance measures, no penalty consequences, for</p> <p>7 inappropriate use of force?</p> <p>8 <b>A. I don't remember ever seeing it in schedule G.</b></p> <p>9 Q. So we can see -- it is in the National Audit Office</p> <p>10 report. We don't need to bring it up.</p> <p>11 <b>A. Okay.</b></p> <p>12 Q. As far as you were aware, it was obviously your job to</p> <p>13 monitor this stuff.</p> <p>14 <b>A. Yes.</b></p> <p>15 Q. There wasn't a certain number of points that would be</p> <p>16 applied to an inappropriate use of force, was there?</p> <p>17 <b>A. No.</b></p> <p>18 Q. Presumably, the consequence of that is that the various</p> <p>19 things that this inquiry has seen which might be found</p> <p>20 to be an inappropriate use of force don't attract any</p> <p>21 penalty points?</p> <p>22 <b>A. No, they don't, no. Not under the contract back then.</b></p> <p>23 Q. In fact, the only way that they would be penalty pointed</p> <p>24 is if there was a complaint about that that was</p> <p>25 substantiated, isn't it?</p> <p style="text-align: center;">Page 194</p>	<p>1 <b>incorrect or possibly risk -- a risk to the person.</b></p> <p>2 Q. You say in your statement that there were some occasions</p> <p>3 when you were personally informed about a use of force</p> <p>4 being used and your name would be on the form as having</p> <p>5 been informed about that?</p> <p>6 <b>A. Yep.</b></p> <p>7 Q. You say at paragraph 120 of your second statement that</p> <p>8 when you were informed about use of force, you would</p> <p>9 read through the reports to ensure nothing of concern</p> <p>10 and you would ask about the background; is that right?</p> <p>11 <b>A. So, yeah, so that kind of -- what I meant by that was,</b></p> <p>12 <b>sometimes use of force -- so if I was on call for that</b></p> <p>13 <b>week, I was the duty on call for Brook House, I'd get</b></p> <p>14 <b>a call because it was outside of office hours, for</b></p> <p>15 <b>example, just to say, "Paul, just to let you know, use</b></p> <p>16 <b>of force has been used on Mr ... for this reason" and</b></p> <p>17 <b>then I would ask a bit more information about it if it</b></p> <p>18 <b>wasn't obvious why use of force was used on that person</b></p> <p>19 <b>and ask a bit more information.</b></p> <p>20 Q. Did you ever watch the footage of a use of force in</p> <p>21 those scenarios?</p> <p>22 <b>A. I did -- did I watch -- I watched some use of force but</b></p> <p>23 <b>that was part of the use of force meeting. No, again,</b></p> <p>24 <b>I could watch use of force and think it was okay.</b></p> <p>25 <b>I wouldn't be able to pick out the technicalities.</b></p> <p style="text-align: center;">Page 196</p>

<p>1 Q. Yes, because, presumably, as you said, you wouldn't be</p> <p>2 able to actually assess whether a use of force was done</p> <p>3 properly because you weren't trained in it, and --</p> <p>4 <b>A. Yes.</b></p> <p>5 Q. -- you wouldn't have known; is that right?</p> <p>6 <b>A. That's right, yes.</b></p> <p>7 Q. But you do say in your statement that one of the ways</p> <p>8 that you would evaluate G4S's performance under the</p> <p>9 contract is reviewing use of force reviews; is that</p> <p>10 right?</p> <p>11 <b>A. Yes.</b></p> <p>12 Q. We have heard evidence from Stephen Webb, who used to</p> <p>13 carry out some of those reviews --</p> <p>14 <b>A. Okay.</b></p> <p>15 Q. -- who did carry all of them out during the relevant</p> <p>16 period, the ones that were carried out. He told us that</p> <p>17 they were all done by him in his time off as a tick-box</p> <p>18 exercise and done two to three months after the incident</p> <p>19 had actually happened.</p> <p>20 <b>A. Okay.</b></p> <p>21 Q. Is that something you were aware of?</p> <p>22 <b>A. No. So my understanding of a use of force is that it</b></p> <p>23 <b>would go through certain managers to also read it. So</b></p> <p>24 <b>by the time it got to the Home Office, and sometimes</b></p> <p>25 <b>that was why there was a delay on use of force</b></p> <p style="text-align: center;">Page 197</p>	<p>1 <b>C&amp;R instructor reviewing them as a tick-box exercise,</b></p> <p>2 <b>well, it's -- you know, it is alarming, isn't it?</b></p> <p>3 <b>That's quite shocking to hear that now. I didn't know</b></p> <p>4 <b>that at the time. But that responsibility surely sits,</b></p> <p>5 <b>I would say, with G4S. Having now known that, if I'd</b></p> <p>6 <b>known that at the time, I obviously would have picked it</b></p> <p>7 <b>up with G4S and perhaps brought that to their attention</b></p> <p>8 <b>and looked at ways to improve that way of doing things.</b></p> <p>9 Q. You say in your statement that there were monthly use of</p> <p>10 force meetings, from at least 2015, which were chaired</p> <p>11 by G4S head of security which a member of</p> <p>12 the Home Office would attend. But the Verita report</p> <p>13 into Brook House found that those hadn't been taking</p> <p>14 place at all since 2016. Does that accord with your</p> <p>15 recollection?</p> <p>16 <b>A. No, they were quite inconsistent. So what should have</b></p> <p>17 <b>happened was, there was a monthly security meeting, and</b></p> <p>18 <b>then, following on from that monthly security meeting,</b></p> <p>19 <b>the use of force meeting should have continued on.</b></p> <p>20 Q. Why wasn't someone from the Home Office raising concerns</p> <p>21 about those not happening?</p> <p>22 <b>A. I don't know if they did or they didn't. I don't know.</b></p> <p>23 Q. Did you ever raise concerns about those not happening?</p> <p>24 <b>A. I don't remember raising those concerns.</b></p> <p>25 Q. It was part of the contract that they have use of force</p> <p style="text-align: center;">Page 199</p>
<p>1 <b>reports --</b></p> <p>2 Q. I'm talking about the use of force reviews. You said</p> <p>3 you would review the use of force reviews?</p> <p>4 <b>A. I would read the use of force reports.</b></p> <p>5 Q. No, the reviews is what you say.</p> <p>6 <b>A. Oh, did I?</b></p> <p>7 Q. Yes.</p> <p>8 <b>A. In that case, I probably meant reports. The use of</b></p> <p>9 <b>force reports would come into our immigration office.</b></p> <p>10 <b>I would read through them and some of my colleagues --</b></p> <p>11 <b>or two of my colleagues would read through them as well</b></p> <p>12 <b>just to see if anything did jump out at us that perhaps</b></p> <p>13 <b>we should be raising anything of concern.</b></p> <p>14 Q. In reality, Mr Gasson, that's not really any sort of</p> <p>15 oversight at all, is it, because you don't know what</p> <p>16 you're looking for and there is no-one from the</p> <p>17 Home Office who does know what they're looking for who</p> <p>18 is actually checking this, is there?</p> <p>19 <b>A. So the use of force monitor I mentioned earlier, they</b></p> <p>20 <b>could come in and look at any use of force they wanted.</b></p> <p>21 <b>As part of the contract, I think the third column, how</b></p> <p>22 <b>G4S would audit, things like that, they should have</b></p> <p>23 <b>their senior management team or member of the senior</b></p> <p>24 <b>management team or C&amp;R instructor. They should be</b></p> <p>25 <b>reviewing -- I mean, what you have just said about that</b></p> <p style="text-align: center;">Page 198</p>	<p>1 meetings. You're a compliance manager --</p> <p>2 <b>A. Not necessarily for the Home Office to attend. They</b></p> <p>3 <b>would be reviewing it internally. They should be</b></p> <p>4 <b>reviewing their own staff use of force.</b></p> <p>5 Q. But, Mr Gasson, you are a compliance manager. It is</p> <p>6 your job to check --</p> <p>7 <b>A. Contract monitor, yes.</b></p> <p>8 Q. Contract manager?</p> <p>9 <b>A. Contract monitor.</b></p> <p>10 Q. Monitor. It is your job to check that G4S are complying</p> <p>11 with the contract. Part of the contract says that there</p> <p>12 must be -- it must be recorded, retained on video, the</p> <p>13 IMB must be informed, use of force reports must be</p> <p>14 completed.</p> <p>15 <b>A. Yes.</b></p> <p>16 Q. Were you checking that --</p> <p>17 <b>A. Use of force reports were always completed and, if they</b></p> <p>18 <b>weren't, we would chase those use of force reports.</b></p> <p>19 <b>Because we'd be aware -- any reported use of force, we</b></p> <p>20 <b>would be aware of, and then the use of force reports,</b></p> <p>21 <b>the expectation was, within 24 hours, those reports</b></p> <p>22 <b>should be with immigration on site. Sometimes we used</b></p> <p>23 <b>to come in in the morning and the use of force reports</b></p> <p>24 <b>used to be posted underneath the office door, because</b></p> <p>25 <b>our office was locked, and we would chase those. So</b></p> <p style="text-align: center;">Page 200</p>

<p>1 <b>that part of the contract, yes, it was. We would chase</b>  2 <b>those use of force reports.</b>  3 Q. I want to move on to rule 40. As part of your role, you  4 would join staff on a rule 40 or rule 42 visit a couple  5 of times a month; yes?  6 <b>A. Maybe more than that. As immigration -- as contract</b>  7 <b>monitor, yes.</b>  8 Q. You were asked about some occasions when you were  9 notified that a detained person was placed on a rule 40  10 and you were also asked about some occasions when you  11 authorised that a detainee be put on a rule 40?  12 <b>A. Yes.</b>  13 Q. You say, at paragraph 122 of your statement, that for  14 the cases where you weren't authorising rule 40 removal  15 from association, it would be authorised by a G4S  16 manager; yes?  17 <b>A. Yes.</b>  18 Q. You say that was the correct process. Now, as far as  19 you were aware, in what circumstances could G4S, rather  20 than you, authorise a rule 40?  21 <b>A. In what circumstances? So if it was -- I forget the</b>  22 <b>word. So sorry. So in matters of urgency, for example,</b>  23 <b>where the officers had to react immediately to that</b>  24 <b>individual because maybe they were being refractory,</b>  25 <b>they were being violent, perhaps even self-harming</b></p> <p>Page 201</p>	<p>1 <b>that confusion about the authorisation, the</b>  2 <b>notification, as it was set out quite clearly in the</b>  3 <b>boxes.</b>  4 Q. So were you clear during the relevant period, which is  5 after February 2017, that it should be G4S -- it should  6 be the Home Office who authorise rule 40, other than in  7 cases of urgency --  8 <b>A. That should be the case.</b>  9 Q. In your experience, was that what happened? Was it only  10 in cases of urgency that G4S did the authorising  11 themselves or did they do it themselves as a matter of  12 course?  13 <b>A. If they were going to put someone on rule 40</b>  14 <b>retrospectively or the information came through to show</b>  15 <b>that this person was maybe -- you know, maybe at risk</b>  16 <b>from some of the population in the centre, then they</b>  17 <b>might come to us and say, "We are worried about this</b>  18 <b>person. We might move him to rule 40". This is before</b>  19 <b>E wing, obviously.</b>  20 Q. Why are you saying it retrospectively? What's the  21 relevance of that?  22 <b>A. What do you mean?</b>  23 Q. I'm asking you whether, when the decision is taken to  24 put someone on rule 40, which you have said should be  25 the Home Office unless it needs to be done urgently --</p> <p>Page 203</p>
<p>1 <b>themselves --</b>  2 Q. So that was your understanding, that in matters of  3 urgency --  4 <b>A. Not necessarily self-harming, sorry. But certainly</b>  5 <b>where they suddenly -- if there was, like, for example,</b>  6 <b>a fight suddenly between two detainees, or even an</b>  7 <b>assault on an officer, and other officers stepped in to</b>  8 <b>immediately remove that person from the vicinity, then</b>  9 <b>yes.</b>  10 Q. But as far as you were aware, it was in matters of  11 urgency that G4S could authorise a use of rule 40; yes?  12 <b>A. Yes. In most -- yes. That was a general understanding.</b>  13 <b>That's the instruction, yes.</b>  14 Q. Would that suggest to you that it would mostly be the  15 Home Office who authorised it and then occasionally G4S?  16 <b>A. I think until the DSO was written --</b>  17 Q. February 2017.  18 <b>A. Yes. Until that was written and rolled out -- because</b>  19 <b>I think it was updated, wasn't it, quite soon, I think?</b>  20 <b>There was a bit of confusion over whose name should go</b>  21 <b>on the old DCF1 form, so the DCF1 being rule 40, and</b>  22 <b>there's four pages to it, the front one being obviously</b>  23 <b>name, time, reason for, and person authorising. There</b>  24 <b>was a bit of confusion over whose name should go in that</b>  25 <b>box. It wasn't that clear. The DSO I think cleared up</b></p> <p>Page 202</p>	<p>1 <b>A. Yes.</b>  2 Q. -- I'm asking you, was that what happened? Was it the  3 Home Office who did the authorising other than in cases  4 where it was urgent?  5 <b>A. It should have been, yes.</b>  6 Q. And was it?  7 <b>A. As far as I recall, yes.</b>  8 Q. You say in your statement that where it was to be done  9 by G4S, it should be done by the G4S manager. What was  10 your understanding of who from G4S could authorise  11 placement on rule 40?  12 <b>A. I think it was a detainee custody manager.</b>  13 Q. In cases where you were doing the authorising, and there  14 are cases we have got where you personally authorised  15 placement on rule 40, how did you satisfy yourself that  16 the terms of rule 40 were met?  17 <b>A. So they would explain whoever was asking for</b>  18 <b>authorisation to relocate that person to rule 40</b>  19 <b>accommodation. They would set out why they wanted to do</b>  20 <b>that and what, you know, what the need was for that.</b>  21 Q. You would read the papers?  22 <b>A. If I wasn't on the site, they'd read it out to me or</b>  23 <b>they'd say what they were going to write.</b>  24 Q. How would you satisfy yourself that it was necessary in  25 the interests of security or safety?</p> <p>Page 204</p>

<p>1 <b>A. Well, if it met the threshold of those -- of that, then</b>  2 <b>that would be --</b>  3 Q. You'd presumably take what G4S told you at face value?  4 <b>A. Yes. If it was over the phone, then yes. What -- yes.</b>  5 Q. Did you ever receive training about placement of  6 detainees on rule 40?  7 <b>A. There was no training, no.</b>  8 Q. So when the new DSO came in that we just talked about,  9 you weren't trained specifically on that?  10 <b>A. I think training came later.</b>  11 Q. I want to move on to the issue of your interaction with  12 the Gatwick Detainee Welfare Group. Firstly, on the  13 issue of the draft memorandum of understanding, you talk  14 about it having -- in your statement, about it having  15 been agreed and finalised with GDWG in February 2016.  16 <b>A. Yes.</b>  17 Q. The evidence the inquiry has received from James Wilson  18 of GDWG and Dan Haughton from G4S is that the memorandum  19 of understanding was never agreed. It continued to be  20 a draft. Is there any reason why you say it was agreed?  21 <b>A. The one dated February 16th?</b>  22 Q. You say February 2016?  23 <b>A. Sorry, February 2016, yes.</b>  24 Q. There was a memorandum of understanding and you say it  25 was agreed?</p> <p style="text-align: center;">Page 205</p>	<p>1 right?  2 <b>A. Okay, yes.</b>  3 Q. What was the problem with having repeat visits? What  4 was your issue with it?  5 <b>A. There was no problem. They did have repeat visits.</b>  6 Q. Why did they need to show exceptional circumstances to  7 justify -- if they thought it was in the interests of  8 the detainee and they were trying to help the detainee,  9 why did they need exceptional circumstances?  10 <b>A. Do you mean the drop-in as opposed to the social visits.</b>  11 Q. As opposed to volunteer --  12 <b>A. Because there was no restriction on the social visits.</b>  13 Q. I'm asking you about the drop-ins.  14 <b>A. The drop-ins, I don't know why that was ever in</b>  15 <b>the MOU -- it must have been a discussion G4S had at the</b>  16 <b>time with the previous director because he wanted to</b>  17 <b>trial -- from my recollection, the original reason for</b>  18 <b>the meetings, or the drop-in surgeries, was to try and</b>  19 <b>match up the volunteers with the people who were</b>  20 <b>detained appropriately, be it language, age, interests,</b>  21 <b>I don't really know, and that was the understanding at</b>  22 <b>the time, and I think I came in to that kind of</b>  23 <b>agreement later.</b>  24 Q. Did you personally see there to be any reason why they  25 had to show exceptional circumstances to have a second</p> <p style="text-align: center;">Page 207</p>
<p>1 <b>A. Yeah, it was agreed, yes.</b>  2 Q. The other evidence is -- there is no evidence to suggest  3 that it's agreed. On what basis do you think it was  4 agreed, is the question?  5 <b>A. So there is an email from Nic Eadie, who I think was the</b>  6 <b>previous director. In fact, he was the previous</b>  7 <b>director at the Gatwick Welfare Group. To someone at</b>  8 <b>G4S who said -- who then forwarded the email to me from</b>  9 <b>him saying he was happy with the MOU, let's go ahead and</b>  10 <b>sign it.</b>  11 Q. We haven't seen that. Are you able to access that  12 email?  13 <b>A. Yes.</b>  14 Q. If you can provide it to the inquiry in due course?  15 <b>A. Apologies that that hasn't been disclosed.</b>  16 Q. Before we get into some of the specific meetings that  17 you had with the GDWG, you were asked why exceptional  18 circumstances were required before it was -- GDWG were  19 allowed to have repeat visits with staff. Do you  20 remember that?  21 <b>A. Yes.</b>  22 Q. You say that there was a difference between the drop-in  23 surgeries and volunteer visits and that the visits --  24 the drop-in surgeries, you thought it was reasonable to  25 clarify why they needed a second one of those. Is that</p> <p style="text-align: center;">Page 206</p>	<p>1 visit?  2 <b>A. No, I think they had to ask G4S that they wanted to see</b>  3 <b>this person again and set out the reason.</b>  4 Q. Why?  5 <b>A. I don't know.</b>  6 Q. So there is no substantive reason that you can give for  7 it?  8 <b>A. I think it's because their role was a befriender</b>  9 <b>service, or their role is a befriender service, and the</b>  10 <b>point of the surgeries or the drop-in was so that they</b>  11 <b>could match them up with the volunteers. That was the</b>  12 <b>reason. That was what the MOU, I think, is clear on,</b>  13 <b>isn't it?</b>  14 Q. Well, it is their clear evidence that there was no  15 agreed MOU. If they are saying that -- if a member of  16 staff from GDWG is saying that, "I want a second visit  17 to see this person again because I think it will help  18 him", why do they need to show exceptional circumstances  19 for that?  20 <b>A. I don't know.</b>  21 Q. Did you personally see any problem with the GDWG  22 signposting detained people onto other agencies such as  23 RAPT or the Forward Trust?  24 <b>A. The ones that were based in the centre?</b>  25 Q. Yes.</p> <p style="text-align: center;">Page 208</p>

52 (Pages 205 to 208)

<p>1 <b>A. No.</b></p> <p>2 Q. There is some evidence from Dan Haughton, who is giving</p> <p>3 evidence tomorrow, who says that the Home Office and</p> <p>4 Ben Saunders were concerned that GDWG were trying to</p> <p>5 offer legal advice. Was that your view?</p> <p>6 <b>A. There was a couple of cases where it was reported to</b></p> <p>7 <b>me -- I don't know who reported to me. One I think</b></p> <p>8 <b>possibly came from the interview corridor where someone</b></p> <p>9 <b>who had volunteered to leave the UK for the voluntary</b></p> <p>10 <b>return process following a meeting with someone from</b></p> <p>11 <b>GDWG and then came out and changed their mind and</b></p> <p>12 <b>revoked their voluntary return disclaimer form. So it</b></p> <p>13 <b>was just something that was raised and I wanted to ask</b></p> <p>14 <b>GDWG if that -- you know, if they were giving that type</b></p> <p>15 <b>of advice out.</b></p> <p>16 Q. They were very clear throughout that they weren't giving</p> <p>17 legal advice. Was your concern, based on the example</p> <p>18 you have just given, that the Home Office were getting</p> <p>19 in the way of the -- sorry, that GDWG were getting in</p> <p>20 the way of the Home Office's attempts to remove people</p> <p>21 from the United Kingdom?</p> <p>22 <b>A. I don't think they were getting in the way. I mean,</b></p> <p>23 <b>there was a couple -- there was another example and, you</b></p> <p>24 <b>know, this is two examples out of, I'm assuming,</b></p> <p>25 <b>hundreds of people that they saw. So very, very low.</b></p> <p style="text-align: center;">Page 209</p>	<p>1 raised the concern with you?</p> <p>2 <b>A. I think my manager at the time, who was someone</b></p> <p>3 <b>completely different to --</b></p> <p>4 Q. Who was that?</p> <p>5 <b>A. It was someone called Sally. I can't remember her</b></p> <p>6 <b>surname, Sally someone. She was aware of it because --</b></p> <p>7 Q. This is in 2017 I'm talking about.</p> <p>8 <b>A. Oh.</b></p> <p>9 Q. You raise it in March 2017 about a witness statement</p> <p>10 that had been completed in October 2015?</p> <p>11 <b>A. I don't recall raising that, then, at all.</b></p> <p>12 Q. Okay. You say in your statement that you don't recall</p> <p>13 mentioning the statement, but you -- it was recorded by</p> <p>14 GDWG at the time. Were you aware of the concerns about</p> <p>15 that statement?</p> <p>16 <b>A. Aware of the concerns, what, from the Home Office, if</b></p> <p>17 <b>they had any?</b></p> <p>18 Q. Yes.</p> <p>19 <b>A. No, I wasn't aware that there were particular concerns.</b></p> <p>20 Q. Was this part of you, on behalf of the Home Office,</p> <p>21 trying to dissuade GDWG from supporting detained people?</p> <p>22 <b>A. No.</b></p> <p>23 Q. In relation to the June 2017 meeting, it is alleged by</p> <p>24 James Wilson that you personally expressed displeasure</p> <p>25 that they were using drop-in surgeries to do casework.</p> <p style="text-align: center;">Page 211</p>
<p>1 <b>But there was a caseworker -- I remember they rang me</b></p> <p>2 <b>and said "Someone from Gatwick Welfare Group have rung</b></p> <p>3 <b>me to say the flight needs to be stopped". I can't find</b></p> <p>4 <b>that anywhere. I don't know if it was a phone call.</b></p> <p>5 <b>I remember seeing notes on the CID at the time to that</b></p> <p>6 <b>effect --</b></p> <p>7 Q. Do you remember whether --</p> <p>8 <b>A. -- but I can't find it, for the life of me.</b></p> <p>9 Q. Was that several years before the relevant period?</p> <p>10 <b>A. I don't know.</b></p> <p>11 Q. In the relevant period, or around the relevant period,</p> <p>12 there is a few meetings that I want to ask you about</p> <p>13 briefly -- March 2017, June 2017 and August 2017. The</p> <p>14 first one in March 2017, one of the issues that was</p> <p>15 raised by you was that a member of GDWG staff,</p> <p>16 Naomi Blackwell, had given a witness statement in</p> <p>17 support of a detainee back in 2015, so around 18 months</p> <p>18 earlier. You say in your statement, Mr Gasson, that you</p> <p>19 recall that senior management at the Home Office were</p> <p>20 aware of this and there was a concern about the level of</p> <p>21 detail and a request for clarification. What was your</p> <p>22 concern about the level of detail?</p> <p>23 <b>A. I'd never read -- I've never read the witness statement.</b></p> <p>24 <b>I don't know.</b></p> <p>25 Q. Who was it from the Home Office senior management that</p> <p style="text-align: center;">Page 210</p>	<p>1 Why would that be a problem for you?</p> <p>2 <b>A. What casework is he talking about?</b></p> <p>3 Q. You express concern about them using the drop-in</p> <p>4 surgeries to do casework. That's the allegation?</p> <p>5 <b>A. It seems -- I don't remember that, but if that was the</b></p> <p>6 <b>case, then it might have been based on those two cases</b></p> <p>7 <b>that I mentioned.</b></p> <p>8 Q. Which were several years before?</p> <p>9 <b>A. It was --</b></p> <p>10 Q. Why would you be raising it?</p> <p>11 <b>A. It wasn't several years ago -- several years before.</b></p> <p>12 <b>I wasn't in Brook House for several years.</b></p> <p>13 Q. Why were you raising it?</p> <p>14 <b>A. It would have been the -- one of the emails that is sent</b></p> <p>15 <b>says the date that -- because I think in his response,</b></p> <p>16 <b>he talks about that there was no GDWG visitor on that</b></p> <p>17 <b>day and they didn't see a certain national, whatever</b></p> <p>18 <b>that -- the person's nationality was. So that put that</b></p> <p>19 <b>to bed. So it was a concern that had been raised</b></p> <p>20 <b>locally and I felt it was appropriate to ask that</b></p> <p>21 <b>question to him.</b></p> <p>22 Q. There was a meeting in August 2017 between you,</p> <p>23 Steve Skitt and James Wilson, and you will have seen</p> <p>24 that James Wilson alleges that, during that meeting, you</p> <p>25 were hostile with an overbearing tone, you became very</p> <p style="text-align: center;">Page 212</p>

<p>1 heated and were shouting at points, and that you</p> <p>2 threatened to remove their drop-in surgeries. Do you</p> <p>3 accept that?</p> <p>4 <b>A. No.</b></p> <p>5 Q. He wrote an email at the time, on the same day, after</p> <p>6 that meeting, to his colleagues, which we have heard in</p> <p>7 evidence, saying that the continuation of the drop-ins</p> <p>8 is on something of a knife edge. Can you think about</p> <p>9 why he would be saying that to colleagues immediately</p> <p>10 following your meeting?</p> <p>11 <b>A. I don't know. I mean, from my recollection of that</b></p> <p>12 <b>meeting, he had emailed at least twice asking to sign</b></p> <p>13 <b>the MOU. It was an opportunity for him to add -- amend</b></p> <p>14 <b>the MOU, add additions to the MOU, how he saw how he</b></p> <p>15 <b>wanted, perhaps, these surgeries to go. On that email</b></p> <p>16 <b>from him, I think it's 25 June 2017, or 26 June, he's</b></p> <p>17 <b>emailed myself, probably Steve and Dan as well, saying,</b></p> <p>18 <b>"Attached is the draft MOU. The board of trustees are</b></p> <p>19 <b>happy that I go ahead and sign it. Can we get together</b></p> <p>20 <b>and sign it?". For whatever reason, we didn't go back</b></p> <p>21 <b>to him quick enough, and then, the following month, he</b></p> <p>22 <b>said, "I'm quite keen", I think it was in July. So my</b></p> <p>23 <b>understanding of the meeting in August -- the meeting</b></p> <p>24 <b>in August, 18 August, was to sign that MOU, but</b></p> <p>25 <b>I think -- and this -- again, this is me -- I think</b></p> <p style="text-align: center;">Page 213</p>	<p>1 Q. So you have a meeting in August 2017. There's still,</p> <p>2 according to GDWG, no signed MOU?</p> <p>3 <b>A. No, but James was keen to sign it.</b></p> <p>4 Q. Then, at that meeting, he says that you were hostile,</p> <p>5 you banged the desk, you were shouting at points and you</p> <p>6 threatened to remove their drop-in surgeries?</p> <p>7 <b>A. No-one banged the desk.</b></p> <p>8 Q. He said, in hindsight, the approach from you on behalf</p> <p>9 of the Home Office and G4S was tantamount to bullying.</p> <p>10 Do you accept that?</p> <p>11 <b>A. Absolutely not. We were simply asking him to clarify</b></p> <p>12 <b>his vision for the surgeries and the role of the company</b></p> <p>13 <b>that -- his charity that he was the director for. At</b></p> <p>14 <b>times, I think from memory, certainly in the first two</b></p> <p>15 <b>or three meetings, which might have been all of them, he</b></p> <p>16 <b>didn't really seem to know what the people were doing</b></p> <p>17 <b>who were coming in and we did ask for clarification and</b></p> <p>18 <b>I think that did finally come through about five or six</b></p> <p>19 <b>weeks after this August the 18th. He wrote it --</b></p> <p>20 <b>I never received it. I have only seen it as part of</b></p> <p>21 <b>this inquiry. I seem to be cc'd onto a letter so I'm</b></p> <p>22 <b>not sure how G4S received that or how it was sent, was</b></p> <p>23 <b>it sent through the post, because it looked like it was</b></p> <p>24 <b>a letter, or if they received it by email, but I have</b></p> <p>25 <b>checked my inbox and I can't find anything on that date</b></p> <p style="text-align: center;">Page 215</p>
<p>1 there was only one meeting in August. I don't think</p> <p>2 there was another one -- was about -- it was about that</p> <p>3 MOU, and whether or not they wanted to add anything to</p> <p>4 it because, with the current MOU, which I am quite sure</p> <p>5 was agreed back in Feb '16, with the previous director,</p> <p>6 this was his opportunity to change anything. So there</p> <p>7 was no real point in three people signing an MOU and</p> <p>8 then us revisiting the same sort of things that were</p> <p>9 coming up. Again, if he wanted to maybe expand what</p> <p>10 GDWG did. He didn't really seem to know what he wanted</p> <p>11 from the surgeries but --</p> <p>12 Q. Mr Gasson, but I'm asking you about the August 2017</p> <p>13 meeting. His evidence was that you threatened to remove</p> <p>14 their drop-in surgeries at that meeting. Did you do so?</p> <p>15 <b>A. I don't remember myself or Dan or Steve ever saying</b></p> <p>16 <b>that. The MOU was still in place. The current MOU --</b></p> <p>17 Q. Well, we know --</p> <p>18 <b>A. -- the one that was signed in February 2016, was still</b></p> <p>19 <b>in place --</b></p> <p>20 Q. Well, we know that --</p> <p>21 <b>A. -- and that would remain in place, wouldn't it?</b></p> <p>22 Q. We know there is a dispute of evidence about that,</p> <p>23 Mr Gasson. You say there is a signed one, but we don't</p> <p>24 have evidence of a signed MOU?</p> <p>25 <b>A. Okay.</b></p> <p style="text-align: center;">Page 214</p>	<p>1 that clarified the drop-in surgeries or what he wanted.</p> <p>2 Q. Looking back, Mr Gasson, do you consider your approach</p> <p>3 to James Wilson and GDWG during the relevant period was</p> <p>4 a reasonable one?</p> <p>5 <b>A. I do consider it was reasonable. I mean, they were</b></p> <p>6 <b>fairly short meetings. There was about four of them</b></p> <p>7 <b>over the period of a number of months. You know, with</b></p> <p>8 <b>all due respect to James and the GDWG, you know, they</b></p> <p>9 <b>didn't feature that prominently on my radar. I was</b></p> <p>10 <b>aware that they came in and they did a very valuable</b></p> <p>11 <b>service to the people who were detained. I think that's</b></p> <p>12 <b>referenced in one of the emails. I think he actually</b></p> <p>13 <b>quotes one of us saying it, how valuable the service is,</b></p> <p>14 <b>and it really was. There was no issue with them coming</b></p> <p>15 <b>in on social visits. We just wanted clarification</b></p> <p>16 <b>around the drop-in surgeries and what they actually did</b></p> <p>17 <b>in there. Because we'd made some good progress -- or</b></p> <p>18 <b>G4S had made some good progress with GDWG in the run-up</b></p> <p>19 <b>to 2015. The person in place at the time, a guy called</b></p> <p>20 <b>Chris -- because, from the email, I remember -- he had</b></p> <p>21 <b>offered to walk around -- Nick and his colleagues around</b></p> <p>22 <b>Brook House, an offer which he took up. They took</b></p> <p>23 <b>a tour around Brook House. But James Wilson talks about</b></p> <p>24 <b>building a relationship and that, which is fine, as far</b></p> <p>25 <b>as I was aware, looking at the emails, there was nothing</b></p> <p style="text-align: center;">Page 216</p>

<p>1 in his emails, in any of his emails, to show that, in</p> <p>2 any way, shape or form, he felt anything that he says in</p> <p>3 his verbal and witness evidence. If that was the case</p> <p>4 and he felt that way, of course I can only apologise</p> <p>5 that I made him feel that way, but I cannot think of</p> <p>6 anything that myself or even Steve or Dan said in that</p> <p>7 meeting that may have made him think that way. We were</p> <p>8 just simply asking for clarification and he didn't seem</p> <p>9 to be able to tell us that -- what that was.</p> <p>10 Q. Mr Gasson, just a couple of final questions, if I may.</p> <p>11 You had a role, after Panorama, of being responsible for</p> <p>12 removing the certification or revoking certification of</p> <p>13 staff who had been caught up in Panorama; yes?</p> <p>14 A. Yes, it wasn't a new role. It was part of the existing</p> <p>15 DSO.</p> <p>16 Q. You recommended the revocation of certification for</p> <p>17 a number of staff; is that right?</p> <p>18 A. Yes.</p> <p>19 Q. You talk in your witness statement about the shock that</p> <p>20 you felt at the behaviour documented in Panorama, and</p> <p>21 you say that what added to your shock was that not</p> <p>22 a single member of G4S senior management team was aware</p> <p>23 of what was shown?</p> <p>24 A. Mmm.</p> <p>25 Q. Given that you were present almost every day at</p> <p style="text-align: center;">Page 217</p>	<p>1 whistleblowing process or through the SIR process or</p> <p>2 even going up to the senior management office and saying</p> <p>3 "I've just witnessed this".</p> <p>4 MR LIVINGSTON: I have no further questions for you. I'm</p> <p>5 not sure if the chair has any questions.</p> <p>6 Questions from THE CHAIR</p> <p>7 THE CHAIR: Thank you, Mr Livingston. I do have a couple of</p> <p>8 brief questions for you, Mr Gasson.</p> <p>9 The first, you mentioned earlier on in your evidence</p> <p>10 that it was sometimes difficult to get raw data from</p> <p>11 G4S. Can you tell me a bit more about that, please?</p> <p>12 A. Yes. So we -- so, obviously, when we received the</p> <p>13 staffing figures, we had one set of figures -- we had</p> <p>14 nothing to compare it to. As a monitoring role, we need</p> <p>15 to compare the raw data with what we have been presented</p> <p>16 with because it is an Excel spreadsheet. In no way</p> <p>17 shape or form am I saying that that had been</p> <p>18 manipulated, but we needed to satisfy ourselves that the</p> <p>19 minimum staffing requirement was being met. It was</p> <p>20 actually one of the deputy immigration managers who</p> <p>21 actually resolved it. When we asked -- I think it was</p> <p>22 prior to Ben coming in. When we asked the previous</p> <p>23 director, "Can we have these figures?", he said it</p> <p>24 wasn't available. So my colleague deputy immigration</p> <p>25 manager walked through to the G4S admin office and asked</p> <p style="text-align: center;">Page 219</p>
<p>1 Brook House, were you also shocked that you were not</p> <p>2 aware of it?</p> <p>3 A. I was. I was. Genuinely, yes, shocked. It was</p> <p>4 a complete surprise.</p> <p>5 Q. Do you consider yourself to bear some responsibility for</p> <p>6 not having spotted what was shown on Panorama?</p> <p>7 A. I mean, if I'd seen it, if I had an inkling from it, I'm</p> <p>8 just surprised that it didn't -- it didn't come out</p> <p>9 because there are several instances where staff have</p> <p>10 raised concerns around the conduct of other staff and</p> <p>11 G4S were very quick to act in those instances. They</p> <p>12 notified us -- "us" being the Home Office on site and</p> <p>13 also the certification team. If they had suspended</p> <p>14 someone -- I'm just surprised that the -- no-one who had</p> <p>15 witnessed the -- you know, the incident, or incidents,</p> <p>16 had raised it because I thought that there was</p> <p>17 a culture, if I'm honest, and based on several examples</p> <p>18 of where people had raised concerns around conduct of</p> <p>19 their fellow officers, and that was investigated by G4S.</p> <p>20 I'm just surprised the number of people, especially with</p> <p>21 the obvious incident where the person was being held</p> <p>22 down and it looked on video being choked, you know, it</p> <p>23 was absolutely shocking, that, one, that happened and,</p> <p>24 two, that no-one took it upon themselves to report it or</p> <p>25 even tried to report it through either the</p> <p style="text-align: center;">Page 218</p>	<p>1 the staffing manager if we could have them, and he went</p> <p>2 "Yes, you can". It was as simple as sort of pressing</p> <p>3 the button on what was called the Chronos machine.</p> <p>4 Following that, that meant that we were able to get</p> <p>5 those daily. Then we cross-referenced that with another</p> <p>6 step that we built into the process whereby we asked to</p> <p>7 see the daily briefing sheet where officers were in the</p> <p>8 actual centre, and then, part of the due diligence on</p> <p>9 not just me, but also my colleague, who, as I said</p> <p>10 earlier, was focused more on the staffing, was, if</p> <p>11 someone appeared on the staffing sheet who perhaps was</p> <p>12 meant to be in reception, or, for example, was on the</p> <p>13 raw data but wasn't on the staffing sheet or had clocked</p> <p>14 in but didn't appear on the Brook House, we wanted to</p> <p>15 know why that was, why was someone working 15 hours, you</p> <p>16 know, one, it's probably a little bit inappropriate for</p> <p>17 somebody to be working on the wing; and then, in time,</p> <p>18 we worked out some people would come in early and use</p> <p>19 the gym or use the gym after they finished work, which</p> <p>20 was maybe skewing the figures. So we wanted to make</p> <p>21 sure that the hours that we were presented was the</p> <p>22 correct hours so we could do the contract monitoring and</p> <p>23 pass up those numbers.</p> <p>24 THE CHAIR: Thank you. The other question I have is in</p> <p>25 relation to, you talked us through, again, earlier on in</p> <p style="text-align: center;">Page 220</p>

55 (Pages 217 to 220)

1 your evidence, about the routine that you established to  
 2 check on some of the things that you identified as being  
 3 useful for you to do so. Where did you kind of compile  
 4 that list of things that you were going to check on?  
 5 How did you come up with that approach?  
 6 **A. Just over time. I had different routes through the**  
 7 **centre. So I would drop down to the interview corridor,**  
 8 **for example. I would see if our staff are okay, see if**  
 9 **there was a number of G4S staff, see if they were**  
 10 **bringing staff out in time for our -- for the**  
 11 **immigration staff to be able to, you know, engage with**  
 12 **them, serve paperwork and update them on their cases,**  
 13 **et cetera. I would check the bell rooms were open,**  
 14 **there were two bell rooms, people having bells. There**  
 15 **was instances where -- a couple of instances where I had**  
 16 **had a call from the court clerk to say, you know, "Why**  
 17 **isn't the bell running? The judge is here. I've been**  
 18 **reprimanded a couple of times by a judge", you know,**  
 19 **"Why" -- not my responsibility, but I made sure that it**  
 20 **was open, then I would maybe go into social visits and**  
 21 **make sure it was generally clean. There was an ACDT**  
 22 **folder behind the desk which meant that staff in there**  
 23 **knew that if anyone was in the visitors area seeing**  
 24 **a relative or family member, they knew they were on**  
 25 **ACDT. So I'd go to different areas. So there was no**

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1 **real structure. There was no real sort of framework.**  
 2 THE CHAIR: Thank you. I don't want to cut you off. I'm  
 3 very conscious that the transcriber desperately needs  
 4 a break. That's very helpful. Thank you. I guess the  
 5 only follow-up question to that, really, is, did you  
 6 have any specific training on how to monitor a contract?  
 7 Did you talk to other contract monitors? Was there any  
 8 kind of guidance as to, "This is what you could look at,  
 9 these are the methodologies that you could use"?  
 10 **A. From recollection, when we first started -- so before**  
 11 **Brook opened in March '09, I went across, and I think**  
 12 **it's in November '08, and spent time in different IRCs,**  
 13 **established IRCs, both for the contact management role**  
 14 **and -- because I'd never sat opposite someone who was**  
 15 **detained before. I used to be a caseworker but I'd**  
 16 **never physically sat in a room, and obviously it's**  
 17 **someone who -- and then the contract monitoring. And,**  
 18 **at that period of time, there was a proper piece of**  
 19 **software for contract monitoring and it reflected all**  
 20 **the parts of the contract monitoring so you could go**  
 21 **around and physically go around and check each part.**  
 22 **For some reason, that dropped off. So early in -- or**  
 23 **mid to late '09, we made our own one up. So the parts**  
 24 **of the contract which we also had in PDF, we would have**  
 25 **those, and me and another deputy immigration manager**

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1 **would rota an AO member of staff once a week to go out**  
 2 **and about and check the -- start the -- check the**  
 3 **contract, the contract against what was happening, so it**  
 4 **might be the security, they might check the PIDS --**  
 5 **which is the -- I think it's the Perimeter Intrusion**  
 6 **Detection System -- was working, the CCTV was working.**  
 7 **Then, the following week, another member of the contact**  
 8 **management team would do the contract monitoring. That**  
 9 **was still in place when I went to Harmondsworth**  
 10 **in August 2011. I think, in that time, the centre just**  
 11 **got a lot busier and that dropped off. But me**  
 12 **personally, I would pick up walking around the centre,**  
 13 **walking around the different areas, I would note what**  
 14 **I had seen and bring those in as part of the weekly**  
 15 **meeting with G4S. And some might have been schedule G,**  
 16 **some may have just been schedule D, anything that I may**  
 17 **have noticed that may have caused a concern or something**  
 18 **they might not know about. But the IMB also fed in --**  
 19 **they were also our kind of eyes and ears sometimes as**  
 20 **well.**

21 THE CHAIR: Thank you, Mr Gasson. I have no other  
 22 questions. Mr Livingston --

23 Further examination by MR LIVINGSTON

24 MR LIVINGSTON: Chair, I have two very short things, but the  
 25 stenographers, I think, are struggling.

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1 If we can bring up on screen, please, <HOM000798> at  
 2 page 147. This is another version of the schedule D  
 3 which I brought up earlier. I'd asked you before,  
 4 Mr Gasson, about what the relevant failures would be in  
 5 relation to reporting a self-harm injury. Was this the  
 6 procedural matters that you were talking about?  
 7 **A. Yeah, that's pretty much the only thing in schedule D**  
 8 **that related to laid-out procedures, from what I can --**  
 9 **from my recollection and from looking through the**  
 10 **contract. I think you said yourself you couldn't find**  
 11 **anything.**  
 12 Q. One final question. I asked you in relation to rule 40  
 13 about the circumstances in which G4S could authorise it  
 14 rather than yourself, and I asked you who the relevant  
 15 manager was from G4S, and you said, "I think it was  
 16 a DCM". Do you remember how you formed the view that  
 17 DCMs could authorise rule 40?  
 18 **A. I think they did it on behalf of the manager, so I think**  
 19 **that was a delegated responsibility that perhaps they**  
 20 **were given.**  
 21 Q. Do you remember how you understood that to be the case?  
 22 **A. I don't.**  
 23 MR LIVINGSTON: Chair, I have no further questions, and I'm  
 24 sorry for the stenographers, as always. Thank you, sir.  
 25 Chair, we are due to start another witness today,

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56 (Pages 221 to 224)



<p>1 Vanessa Smith. Can I suggest -- would you like 2 a 15-minute break? 3 THE CHAIR: Thank you, Mr Gasson. I know it's been a long 4 afternoon. I know it is not an easy experience. I'm 5 very grateful for you coming and giving your evidence. 6 We will see you at 4.15 pm. 7 (4.01 pm) 8 (A short break) 9 (4.15 pm) 10 MS VANESSA SMITH (sworn) 11 Examination by MS TOWNSHEND 12 MS TOWNSHEND: Chair, we will end this afternoon's evidence 13 with the evidence of Vanessa Smith. 14 Ms Smith, could you please give your full name to 15 the inquiry? 16 <b>A. It's vanessa Smith.</b> 17 Q. Is it correct that you have provided an inquiry witness 18 statement which is &lt;HOM0332141&gt; 19 <b>A. That's correct.</b> 20 Q. Chair, I'd like this to be adduced, please, today. 21 THE CHAIR: Thank you. 22 MS TOWNSHEND: Ms Smith, I want to ask you first about your 23 roles during the relevant period. Firstly, before the 24 relevant period, from May 2013, you started as 25 a Home Office Brook House administrative officer; is</p> <p style="text-align: right;">Page 225</p>	<p>1 Q. So you worked in the pilot predeparture team as we have 2 said. That involved meeting residents and building 3 a returns plan. You discuss their position and try to 4 identify and resolve barriers to return. You also 5 explain in your witness statement, paragraphs 100 to 6 101, that in the case of non-compliant removals, so 7 where detained persons didn't want to go, then you might 8 ask someone from G4S to be present if there was concerns 9 that that person would be violent. You also say there 10 will be a list of people, and they would be on a raised 11 concerns, if RDs -- presumably, "removal directions" -- 12 were served. Just so that I can understand -- we can 13 understand what that means is, if somebody was given 14 removal directions, you would be present at the time 15 that they were going to be removed from the centre; is 16 that right? 17 <b>A. No, that's not. It's -- what I meant in my statement</b> 18 <b>was, when I'm serving the flight ticket, if I knew they</b> 19 <b>were going to be disruptive, looking at their notes</b> 20 <b>previously, knowing that they (inaudible), I would have</b> 21 <b>somebody outside the interview doors, just in case they</b> 22 <b>do -- they become disruptive when I'm giving them their</b> 23 <b>tickets.</b> 24 Q. When you say "people", do you mean detention centre 25 officers?</p> <p style="text-align: right;">Page 227</p>
<p>1 that correct? 2 <b>A. That's correct.</b> 3 Q. And then, from October 2016, you moved to the engagement 4 office within the pilot predeparture team -- 5 <b>A. That's correct.</b> 6 Q. -- which then became permanent around 4 October 2017? 7 <b>A. That's correct.</b> 8 Q. Since then, is it correct that you have remained at 9 Brook House? 10 <b>A. That's correct.</b> 11 Q. There are two teams, you explain in your witness 12 statement at paragraph 7, at Brook House for the 13 Home Office. The first is the pilot predeparture team, 14 now known as the detention engagement team, and the 15 second is the contract monitoring team? 16 <b>A. Yes, and they are called DES -- detention escorting</b> 17 <b>services.</b> 18 Q. Compliance team? 19 <b>A. Compliance team.</b> 20 Q. In terms of your evidence today, that's going to focus 21 on the detention engagement team? 22 <b>A. Yes.</b> 23 Q. Do you know why the name changed from the predeparture 24 team to the detention engagement team? 25 <b>A. To be honest, I don't know.</b></p> <p style="text-align: right;">Page 226</p>	<p>1 <b>A. Outside the corridor would be the G4S officers. I would</b> 2 <b>tell them to just be aware that he might be disruptive</b> 3 <b>if I'm serving him his ticket.</b> 4 Q. Was this the process that was in place in 2017? 5 <b>A. Yes.</b> 6 Q. When a person was physically going to be removed after 7 you provide the ticket and said that they were going to 8 be leaving -- 9 <b>A. Mmm-hmm.</b> 10 Q. -- at that point, was there anybody from the Home Office 11 present? 12 <b>A. I'm not -- I don't think so.</b> 13 Q. I want to ask you now about detainee forum meetings. 14 You say in your witness statement, at paragraphs 19 to 15 20, that when they were in the pilot stage, you would 16 attend these detainee forum meetings with the compliance 17 team. When were these detainee forum meetings in their 18 pilot stage? 19 <b>A. In the first -- when we first started, it was a trial</b> 20 <b>and error to see what things worked, because we were in</b> 21 <b>a pilot. So we would attend these meetings to see how</b> 22 <b>it went, but, as I said in my statement, that we stopped</b> 23 <b>attending those meetings because it was -- it was not</b> 24 <b>relevant to us, only because they were asking us case</b> 25 <b>information, which it shouldn't be shared with other</b></p> <p style="text-align: right;">Page 228</p>

<p>1 <b>parties because of legal -- because of confidentiality.</b></p> <p>2 <b>We couldn't discuss cases. Hence we did the drop-in</b></p> <p>3 <b>sessions.</b></p> <p>4 Q. When you say "we stopped attending", do you mean both</p> <p>5 the predeparture team and the compliance team --</p> <p>6 <b>A. No.</b></p> <p>7 Q. -- or do you just mean the predeparture team?</p> <p>8 <b>A. Just the predeparture team.</b></p> <p>9 Q. What kind of issues did detainees usually raise in these</p> <p>10 detainee forum meetings?</p> <p>11 <b>A. Mostly about food issues and not having the staff and,</b></p> <p>12 <b>from our point of view, like, why are they still</b></p> <p>13 <b>detained, they were trying to ask us questions, which,</b></p> <p>14 <b>at that point, we couldn't answer. That's why we -- as</b></p> <p>15 <b>I said, we did the drop-in sessions, to give them more</b></p> <p>16 <b>in-depth information that they required.</b></p> <p>17 Q. Did detained persons ever raise issues with no-notice</p> <p>18 charter flights?</p> <p>19 <b>A. Not at my knowledge. I don't know.</b></p> <p>20 Q. Was that something that your team dealt with?</p> <p>21 <b>A. You mean the no notice?</b></p> <p>22 Q. Yes.</p> <p>23 <b>A. It was more to do with compliance who dealt with the</b></p> <p>24 <b>no notice, because we were not -- my job is to settle</b></p> <p>25 <b>the paperwork, but if there was no notice, then we</b></p> <p style="text-align: center;">Page 229</p>	<p>1 relates to a Home Office employee the investigating</p> <p>2 officer is due to meet with Home Office representatives</p> <p>3 on 1 March 2018 to discuss. (Substantiated: Yes)."</p> <p>4 So this is the first two comments that were made --</p> <p>5 that were investigated that were made by you. If we can</p> <p>6 turn to the second one, which is allegation 12, which is</p> <p>7 on page 8, please:</p> <p>8 "Vanessa from the Home Office seemed to have a very</p> <p>9 negative attitude towards detainees. This was shown</p> <p>10 through laughter at comments made, comments she made</p> <p>11 herself and her general attitude to violence, eg, 'I'd</p> <p>12 go to town on them'.</p> <p>13 "All three of the Hibiscus staff reported</p> <p>14 a significant level of concern around the behaviour of</p> <p>15 Vanessa which will be raised by the investigating</p> <p>16 officer with her immediate line management at the</p> <p>17 Home Office on the 1st of March 2018. (Substantiated:</p> <p>18 Yes)."</p> <p>19 You were then subject to a formal disciplinary</p> <p>20 meeting on 24 April 2018?</p> <p>21 <b>A. That's correct.</b></p> <p>22 Q. Zaynab, please could you bring up that document, the</p> <p>23 disciplinary minutes. It is &lt;HOM005901&gt;. It is the</p> <p>24 first page, please. This was the investigation, G4S</p> <p>25 investigation. It is page 1, please.</p> <p style="text-align: center;">Page 231</p>
<p>1 <b>wouldn't be involved in it.</b></p> <p>2 Q. I see. I want to ask you about three specific incidents</p> <p>3 now. The first relates to a training session that took</p> <p>4 place on 22 February 2018. Zaynab, I ask, please, to</p> <p>5 bring up &lt;HOM005901&gt;. This is a G4S investigation</p> <p>6 report into two comments that you made at a personal</p> <p>7 safety training course held at Tinsley House for members</p> <p>8 of staff, three of which were from an organisation</p> <p>9 called Hibiscus. Can I check first, do you know if you</p> <p>10 were the only person that attended from the Home Office?</p> <p>11 <b>A. To my recollection, at that point, yes.</b></p> <p>12 Q. If we could please turn to page 5 of that document, we</p> <p>13 will see, in the middle there, there is an allegation at</p> <p>14 allegation 3, which says:</p> <p>15 "In reference to an incident on Monday night where</p> <p>16 an officer had punched a detainee in the face (several</p> <p>17 detainees had barricaded themselves in their room and</p> <p>18 had weapons and had made the floor wet and soapy. An</p> <p>19 officer was apparently the last one standing and punched</p> <p>20 one of them, Vanessa from the Home Office said he</p> <p>21 deserved it and 'had it coming'. [Someone] then said</p> <p>22 'we don't say that Vanessa'.</p> <p>23 "All of the Hibiscus employees interviewed on the</p> <p>24 27th were clear and consistent that this conversation</p> <p>25 had taken place as described. Since this allegation</p> <p style="text-align: center;">Page 230</p>	<p>1 EPE OPERATOR: It is the same document.</p> <p>2 MS TOWNSHEND: Sorry, I said the wrong number, it's</p> <p>3 &lt;HOM005909&gt;. Thank you. These are the formal</p> <p>4 disciplinary hearing minutes. Page 1, just if you</p> <p>5 can -- the bottom paragraph that we just saw in the</p> <p>6 middle of the page:</p> <p>7 "SL advised that the investigation had found that</p> <p>8 there was a case to answer in relation to the first</p> <p>9 allegation, as VS [Vanessa Smith] had admitted to saying</p> <p>10 these words."</p> <p>11 So you admitted the first allegation; is that</p> <p>12 correct?</p> <p>13 <b>A. That's correct.</b></p> <p>14 Q. That first allegation was substantiated and you were</p> <p>15 issued with a 12-month verbal warning. But the second</p> <p>16 allegation, relating to the comments, "I'd go to town on</p> <p>17 them", and having a negative attitude towards detainees</p> <p>18 was not substantiated.</p> <p>19 <b>A. That's correct. But I would like to highlight the first</b></p> <p>20 <b>allegation was taken out of content. That's why</b></p> <p>21 <b>I admitted it.</b></p> <p>22 Q. We will come on to that in a moment. Thank you,</p> <p>23 Ms Smith.</p> <p>24 <b>A. Okay.</b></p> <p>25 Q. In terms of the discipline outcome letter, I won't ask</p> <p style="text-align: center;">Page 232</p>

<p>1 to bring up that on screen, but that said the second</p> <p>2 allegation was not substantiated, but that's in</p> <p>3 contradiction to the G4S investigation, that we saw and</p> <p>4 brought up on screen earlier, that said it was</p> <p>5 substantiated. Do you know why there was a difference</p> <p>6 between the investigations and the results of those?</p> <p>7 <b>A. I'm not sure because, when I had the meeting with my</b></p> <p>8 <b>manager, it -- because I think the evidence that they</b></p> <p>9 <b>had or the investigation they took, the witnesses that</b></p> <p>10 <b>were there said that I never had that attitude, I think.</b></p> <p>11 Q. But do you know why there was a difference between the</p> <p>12 two different investigations' outcomes: one said that</p> <p>13 the second allegation was substantiated, the first one,</p> <p>14 and the second said it was not proven?</p> <p>15 <b>A. Not that I know of, no.</b></p> <p>16 Q. I want to come on to your account with regard to the</p> <p>17 first allegation. You said in your witness statement,</p> <p>18 at paragraph 31, that you had been expressing yourself</p> <p>19 colloquially and it had been taken out of context and</p> <p>20 the meaning had been misunderstood. You said that what</p> <p>21 you meant was that the actions were justified in the</p> <p>22 circumstances. So you were said to have said, "He</p> <p>23 deserved it and had it coming", and this was in relation</p> <p>24 to an officer having punched a detainee in his face</p> <p>25 where a detainee had barricaded himself in a room. This</p> <p style="text-align: center;">Page 233</p>	<p>1 Q. -- which suggests that someone was retaliating,</p> <p>2 responding, in a revengeful way, that, "You hit me,</p> <p>3 I hit you", as opposed to, "I'm protecting myself"?</p> <p>4 <b>A. As I said, it was a poor choice of words that I used at</b></p> <p>5 <b>that time, bearing in mind the language that was used</b></p> <p>6 <b>throughout that day.</b></p> <p>7 Q. When you say "bearing in mind the language that was used</p> <p>8 throughout that day", what do you mean?</p> <p>9 <b>A. So it was more informal colloquial language and more</b></p> <p>10 <b>casual language, and I guess it was a poor choice of</b></p> <p>11 <b>words that I used at that time.</b></p> <p>12 Q. The suggestion isn't that your language was too</p> <p>13 colloquial or that it was too informal. It was that it</p> <p>14 wasn't appropriate because you were suggesting that</p> <p>15 somebody deserved being punched in the face?</p> <p>16 <b>A. I didn't mean he deserved it. I just meant that it was</b></p> <p>17 <b>justified.</b></p> <p>18 Q. You were the only person from the Home Office there.</p> <p>19 You confirmed that a few moments ago.</p> <p>20 <b>A. Yes.</b></p> <p>21 Q. Do you agree that this does not show leadership?</p> <p>22 <b>A. At that time, I was training, so I was a trainee in that</b></p> <p>23 <b>environment.</b></p> <p>24 Q. You had been working at the engagement office</p> <p>25 since October 2016, and the training was</p> <p style="text-align: center;">Page 235</p>
<p>1 was in the personal safety training. Do you accept now</p> <p>2 that that was a poor choice of words?</p> <p>3 <b>A. Yes, I do.</b></p> <p>4 Q. Would you agree that if you said that the detainee had</p> <p>5 had it coming and deserved it, this suggests that it was</p> <p>6 a punch to a detainee that was in revenge rather than</p> <p>7 a defensive strike?</p> <p>8 <b>A. As I said in my investigation and in my statement, it</b></p> <p>9 <b>was a scenario that was played, and I was thinking of</b></p> <p>10 <b>the scenario when I made that statement and the language</b></p> <p>11 <b>that was used throughout the investigation, and it</b></p> <p>12 <b>was -- what I meant to say at that time, that it was</b></p> <p>13 <b>justified because it was an officer who was under threat</b></p> <p>14 <b>because, in that scenario, all the officers were down,</b></p> <p>15 <b>the floor was soapy, the resident had a knife or</b></p> <p>16 <b>a weapon and it was a live threat situation, and the</b></p> <p>17 <b>officer made that punch.</b></p> <p>18 Q. But if you said someone had it coming or deserved it,</p> <p>19 that suggests that someone had retaliated rather than</p> <p>20 that it was a defensive strike. Would you agree with</p> <p>21 that?</p> <p>22 <b>A. Can you explain what you mean?</b></p> <p>23 Q. So you said that the detainee had had it coming, they</p> <p>24 deserved it --</p> <p>25 <b>A. Yes.</b></p> <p style="text-align: center;">Page 234</p>	<p>1 in February 2018. So there was over a year where you</p> <p>2 were at Brook House. Was this the only training that</p> <p>3 you had had in relation to use of force -- or, rather,</p> <p>4 personal protection, I should say?</p> <p>5 <b>A. Yes. So, basically, PST is done yearly, so personal</b></p> <p>6 <b>safety training is done yearly, on a yearly basis.</b></p> <p>7 Q. So you hadn't had it in the over a year that you had</p> <p>8 been there?</p> <p>9 <b>A. No, I'd had it previously, yes, when I started. We have</b></p> <p>10 <b>to be PST trained in order to see residents.</b></p> <p>11 Q. You said you were in training, but you had in fact had</p> <p>12 this training before?</p> <p>13 <b>A. Yes, but with G4S for the -- I believe it was for the</b></p> <p>14 <b>first time.</b></p> <p>15 Q. If you had had that training before, shouldn't you have</p> <p>16 known better?</p> <p>17 <b>A. Recollecting, I agree that I used a bad choice. It was</b></p> <p>18 <b>a bad choice to say what I said.</b></p> <p>19 Q. In terms of the second allegation, "I'd go to town on</p> <p>20 them" and having a negative attitude, you have denied</p> <p>21 that in the previous investigations. Can you think of</p> <p>22 an explanation as to why the people from Hibiscus might</p> <p>23 have made that up?</p> <p>24 <b>A. I don't know.</b></p> <p>25 Q. You accept that -- in your witness statement,</p> <p style="text-align: center;">Page 236</p>

<p>1 paragraph 33, that due process was followed and</p> <p>2 a sanction was issued. Do you agree with that?</p> <p>3 <b>A. Yes. I was investigated and the -- I accepted what was</b></p> <p>4 <b>sanctioned to me.</b></p> <p>5 Q. If we can place one of the documents we have already</p> <p>6 looked at up on screen again, &lt;HOM005901&gt;. This is the</p> <p>7 G4S investigation, the first document that we saw on</p> <p>8 screen. If we can look at page 1, please. Apologies,</p> <p>9 if you could just go to page 3, and just roll over the</p> <p>10 page, please. And again. We can see the allegations</p> <p>11 there that were set out -- there were two, as I said,</p> <p>12 there were concerning you, but there were others that</p> <p>13 concerned two use of force trainers, which were David</p> <p>14 Webb and Jason Riggs. You can see the first allegation</p> <p>15 is:</p> <p>16 "I'm going to fucking destroy you' (said multiple</p> <p>17 times by [the instructors]. Jason also said at one</p> <p>18 point during the practical training when referring to</p> <p>19 reacting to a detainee attacking you 'To use, and it's</p> <p>20 Dave's favourite line ..."</p> <p>21 We have this unredacted elsewhere:</p> <p>22 "... 'I'll fucking destroy you'".</p> <p>23 Then allegation 2:</p> <p>24 "If it was down to me, give them one more punch for</p> <p>25 luck'."</p> <p style="text-align: right;">Page 237</p>	<p>1 <b>A. To be honest, I can't -- because it's been such a long</b></p> <p>2 <b>time, I can't -- I don't know what my reaction was at</b></p> <p>3 <b>that time. I was just listening to what the instructors</b></p> <p>4 <b>were saying. I didn't make any comments on that.</b></p> <p>5 Q. If you heard that now, what would you think?</p> <p>6 <b>A. I would definitely say something.</b></p> <p>7 Q. Do you know why you didn't say anything at the time?</p> <p>8 <b>A. To be honest, I don't know.</b></p> <p>9 Q. I want to ask you now about another incident in relation</p> <p>10 to D687; in particular, your failure to open an ACDT for</p> <p>11 him on 27 April 2017. If we can please turn to</p> <p>12 &lt;HOM032193&gt;, the first page. You see just from midway</p> <p>13 down the page the date is 27 April 2017. Just please</p> <p>14 scroll back to the top. You see that these are your</p> <p>15 notes, I see from the signature there, "Vanessa Smith";</p> <p>16 is that right?</p> <p>17 <b>A. That's right, yes.</b></p> <p>18 Q. These are GCID notes. Could you just very briefly</p> <p>19 explain what GCID notes are?</p> <p>20 <b>A. So it's an immigration database where information is</b></p> <p>21 <b>stored of the interactions and cases.</b></p> <p>22 Q. Who usually writes on these GCID notes?</p> <p>23 <b>A. So it could be anybody in the Home Office; for example,</b></p> <p>24 <b>engagement officers, they could be caseworkers. So</b></p> <p>25 <b>mostly the people who deal with the cases.</b></p> <p style="text-align: right;">Page 239</p>
<p>1 Those two were substantiated. If we go to</p> <p>2 allegation 4, which is page 5 -- in fact, same page,</p> <p>3 just down there:</p> <p>4 "[The instructors] said that the punches taught in</p> <p>5 the syllabus are never used because they don't do</p> <p>6 anything. They said they would just punch in the face."</p> <p>7 And then if we go to page 7, and it is allegation</p> <p>8 11:</p> <p>9 "[The instructors] were teaching the phrase 'fuck</p> <p>10 off' from the beginning of the training as a way of</p> <p>11 defending yourself. There was swearing used throughout</p> <p>12 the training which was in our view unnecessary, however,</p> <p>13 [an instructor] did say at the beginning of the training</p> <p>14 that there would be swearing and that we should speak to</p> <p>15 him if we don't like the use of swearing. Nobody raised</p> <p>16 concerns with him about the swearing but we felt that</p> <p>17 the level of swearing was unnecessary and we don't feel</p> <p>18 it added to [any] training."</p> <p>19 Just scroll over the page, please, at the top.</p> <p>20 "Substantiated: yes".</p> <p>21 You said earlier in your evidence just now that you</p> <p>22 were reflecting language that was used. No-one is</p> <p>23 suggesting that you were swearing or saying those words,</p> <p>24 but what did you think when you were hearing those --</p> <p>25 that kind of language used talking about detainees?</p> <p style="text-align: right;">Page 238</p>	<p>1 Q. What type of information should be recorded on these</p> <p>2 GCID notes?</p> <p>3 <b>A. So the interactions that we have with residents, or</b></p> <p>4 <b>anything to do with the case, the updates on the case or</b></p> <p>5 <b>what is going on with the cases, so we can -- basically,</b></p> <p>6 <b>engagement officers can read where the case is at.</b></p> <p>7 Q. You see at the top that you have written:</p> <p>8 "Detainee has stated that he will not return to</p> <p>9 Somalia. He will only go back to Somalia in a body bag.</p> <p>10 He was staying strong for his mum as he lost his brother</p> <p>11 few months ago. He can't take it anymore as he is</p> <p>12 mentally stressed being in detention so long. He has</p> <p>13 started to write a suicide [note]. He is going to give</p> <p>14 it a week and if things stay the same he will do</p> <p>15 something.</p> <p>16 "He then stated he is not going to be coming for his</p> <p>17 paperwork.</p> <p>18 "G4S officers and immigration managers warned of his</p> <p>19 intentions."</p> <p>20 This conduct was investigated and you were required</p> <p>21 to provide a witness statement. If we can please get</p> <p>22 that up on screen, &lt;HOM002501&gt;. It is page 1. You will</p> <p>23 see there in the middle this is your statement, your</p> <p>24 brief statement, about it, and it says in the middle of</p> <p>25 the page in black writing:</p> <p style="text-align: right;">Page 240</p>

<p>1 "Why you did not open an ACDT?"</p> <p>2 And the response is there:</p> <p>3 "I didn't open an ACDT as I managed to calm him down</p> <p>4 by explaining the procedures of immigration but informed</p> <p>5 that managers to make them aware, the G4S managers spoke</p> <p>6 to him and didn't feel it was necessary at that time.</p> <p>7 "Later a Part C raise by DCM D Roofey at</p> <p>8 Brook House: ACDT opened on D687 as he has made threats</p> <p>9 to take an overdose to the RAPT team. Brook House</p> <p>10 mental health team aware as well."</p> <p>11 Then if we can turn to your interview, please, on</p> <p>12 24 January 2018, that's at &lt;HOM002505&gt;, page 1, please.</p> <p>13 It is the middle of the page, starting "Ms Smith":</p> <p>14 "Ms Smith said that detainees would say things like</p> <p>15 this out of frustration. She would assess the comment</p> <p>16 by looking at the body language and deciding if they</p> <p>17 really meant the comment or not. If they were shaking</p> <p>18 and of low mood she would open an ACDT. She could not</p> <p>19 recall D687's actions that day but if it had been</p> <p>20 serious she would have opened an ACDT straight away.</p> <p>21 She thought he was just saying it through frustration so</p> <p>22 she had told G4S and immigration managers and G4S spoke</p> <p>23 to him. Ms Smith said that this conversation would take</p> <p>24 place and she would not have been present. They did not</p> <p>25 put him on an ACDT so she assumed D687 had calmed down.</p> <p style="text-align: center;">Page 241</p>	<p>1 <b>A. I think so, but I'm not really sure.</b></p> <p>2 Q. I say "quite soon". The incident happened on 27 April,</p> <p>3 and this document here is from 24 January 2018, so</p> <p>4 around nine months later.</p> <p>5 <b>A. I don't know what to say to that.</b></p> <p>6 Q. I'm just giving you the context for the question, and</p> <p>7 explaining the question to you. So --</p> <p>8 <b>A. So this -- April that the red bit thing was done and</b></p> <p>9 <b>then this one.</b></p> <p>10 Q. No, the incident happened in April.</p> <p>11 <b>A. Okay, yes.</b></p> <p>12 Q. And your account that you have given was</p> <p>13 in January 2018, so that was about nine months later.</p> <p>14 <b>A. Yes.</b></p> <p>15 Q. Today, now, that is much further in time than when you</p> <p>16 were -- between the time that the incident happened</p> <p>17 in April and when you gave your account in January 2018?</p> <p>18 <b>A. Yes.</b></p> <p>19 Q. So it's likely, isn't it, that that information that you</p> <p>20 gave to the investigator, both in your statement and</p> <p>21 your interview, was more accurate, would you say,</p> <p>22 because it was closer in time?</p> <p>23 <b>A. It was closer in time, yes.</b></p> <p>24 Q. So why didn't you mention in that interview or the</p> <p>25 statement that you told him to stay in his room and that</p> <p style="text-align: center;">Page 243</p>
<p>1 She could not remember the feedback from G4S. She could</p> <p>2 not remember if she had emailed the caseworker as well</p> <p>3 as put the note on CID."</p> <p>4 You said in your witness statement, paragraph 44,</p> <p>5 that you agree asking him to stay in his room and asked</p> <p>6 a member of staff to be with him. Is that right?</p> <p>7 <b>A. That's correct.</b></p> <p>8 Q. Would you agree that this interview and your statement</p> <p>9 was done closer to the time that this happened?</p> <p>10 <b>A. Sorry, can you repeat that again?</b></p> <p>11 Q. The interview that took place with Helen Wilkinson,</p> <p>12 which is what we have just seen on screen --</p> <p>13 <b>A. Yes.</b></p> <p>14 Q. -- and what I showed you a few moments ago, which was</p> <p>15 your statement, those were made closer to the time of</p> <p>16 the incident on 27 April 2017 than today's date?</p> <p>17 <b>A. I'm sorry, I can't understand. So you're saying the</b></p> <p>18 <b>first statement you showed me and this one now?</b></p> <p>19 Q. The statement that I showed you a few minutes ago which</p> <p>20 had the red writing on --</p> <p>21 <b>A. Yes.</b></p> <p>22 Q. -- and what I'm just showing you here --</p> <p>23 <b>A. Now, yes.</b></p> <p>24 Q. -- your account that was taken then, that was quite soon</p> <p>25 after the incident happened, wasn't it?</p> <p style="text-align: center;">Page 242</p>	<p>1 you asked a member of staff to be with him?</p> <p>2 <b>A. That was process that we normally followed, so I'm not</b></p> <p>3 <b>really sure why I didn't add it on.</b></p> <p>4 Q. Are you saying that this happened because it's the</p> <p>5 process you normally follow, or because you actually</p> <p>6 remember that it happened?</p> <p>7 <b>A. It's a -- it's normal process that we follow.</b></p> <p>8 Q. But do you remember it happening in this instance?</p> <p>9 <b>A. I do remember it happening. Like, I told him to stay in</b></p> <p>10 <b>the room and I would get -- the process is, I would tell</b></p> <p>11 <b>him to stay in the room, I would get the G4S visit</b></p> <p>12 <b>officers to keep an eye on him and tell them to inform</b></p> <p>13 <b>the Oscars, which is the G4S managers, to have a word</b></p> <p>14 <b>with him after. And I went up to the office and I told</b></p> <p>15 <b>my managers, as I've explained in my CID note, that</b></p> <p>16 <b>"This is the process I have done: I have informed them</b></p> <p>17 <b>and I'm waiting for G4S to come up to tell me whether an</b></p> <p>18 <b>ACDT should be opened or not, if they have settled him</b></p> <p>19 <b>or not".</b></p> <p>20 Q. Do you know why you didn't mention that normal process</p> <p>21 and the process that you said that you did do in this</p> <p>22 case in your interview or in your statement that was</p> <p>23 closer to the time?</p> <p>24 <b>A. I don't know, really.</b></p> <p>25 Q. You said you spoke to managers. Do you know exactly who</p> <p style="text-align: center;">Page 244</p>

<p>1 you notified?</p> <p>2 <b>A. Yes -- managers as in G4S or Home Office?</b></p> <p>3 Q. Both.</p> <p>4 <b>A. I told the visit staff to inform the G4S managers and to</b></p> <p>5 <b>get them present, to get them into the visit, and then</b></p> <p>6 <b>I went upstairs and spoke to my manager, who is</b></p> <p>7 <b>Simon Levitt, and I told him about what I have done,</b></p> <p>8 <b>basically.</b></p> <p>9 Q. So the visit staff: do you remember who that was?</p> <p>10 <b>A. I don't know who that was.</b></p> <p>11 Q. Do you know actually what happened, whether they did in</p> <p>12 fact go and speak to D687?</p> <p>13 <b>A. To be honest, no. I don't think I heard back, so</b></p> <p>14 <b>I assumed he -- they managed to calm him down.</b></p> <p>15 Q. You say that you managed to calm him down.</p> <p>16 <b>A. Yes.</b></p> <p>17 Q. I just want to take you now to D687's account of what</p> <p>18 happened. Please could I ask Zaynab to bring up</p> <p>19 &lt;DPG000021&gt;, page 62 at the bottom. So this is the</p> <p>20 witness statement that D687 has provided to this</p> <p>21 inquiry. This is what D687 says. I'm reading from six</p> <p>22 lines down from the top of paragraph 172:</p> <p>23 "I do not remember feeling calm after my</p> <p>24 conversation with Vanessa Smith, as she suggests. I had</p> <p>25 told her that I asked for help but no-one wanted to help</p> <p style="text-align: center;">Page 245</p>	<p>1 another country I don't know."</p> <p>2 Did you say words to that effect, "I'm just the</p> <p>3 messenger, you'll just need to lump it"?</p> <p>4 <b>A. I would have just -- in my recollection, I would just</b></p> <p>5 <b>tell, like -- in normal residents, if anybody is like</b></p> <p>6 <b>that, I would tell them that "I am between you and your</b></p> <p>7 <b>caseworker, and my job is to give you the information</b></p> <p>8 <b>and explain it to you", but I would never say "lump it",</b></p> <p>9 <b>that's not a word that I would normally use. And</b></p> <p>10 <b>I would try to help them out as well and give them the</b></p> <p>11 <b>information, for example, write -- redirect them to</b></p> <p>12 <b>welfare, to solicitors, explaining the process of</b></p> <p>13 <b>removal.</b></p> <p>14 Q. Do you agree with D687 that you had a dismissive</p> <p>15 attitude?</p> <p>16 <b>A. I wouldn't think so, no.</b></p> <p>17 Q. In your witness statement, you say at paragraph 47, in</p> <p>18 response to the fact that we saw earlier, that a Part C</p> <p>19 was later opened and that the detainee had told the RAPT</p> <p>20 team that he was going to take an overdose, you said, if</p> <p>21 that had happened, if the detainee had told you he was</p> <p>22 going to take an overdose, you would have assessed the</p> <p>23 situation. Do you mean that you would have opened an</p> <p>24 ACDT?</p> <p>25 <b>A. Yes, because if he's -- the threat that he gave me when</b></p> <p style="text-align: center;">Page 247</p>
<p>1 me, not the nurses, not the officers. So I would just</p> <p>2 die at Brook House. I told her it would be the last</p> <p>3 monthly progress report she would give as I'd be dead in</p> <p>4 the next month. She told me what their rules are, that</p> <p>5 I'd be going on a flight once I had a ticket. Her</p> <p>6 concern was serving the paperwork, she wasn't interested</p> <p>7 in whether I lived or died and that came across in her</p> <p>8 dismissive attitude. She didn't even tell me what</p> <p>9 I wanted to hear for the sake of encouragement, just</p> <p>10 what she had been told to tell me -- here is your</p> <p>11 monthly progress report, lump it. She made me more</p> <p>12 pissed off, more angry as I was walking out. She made</p> <p>13 it worse. She said things like, 'I'm just</p> <p>14 a messenger -- been told to pass it on to you; whatever</p> <p>15 it is, you'll need to lump it and deal with it, there's</p> <p>16 nothing I can do; 'I am not here to help you, I am just</p> <p>17 here to serve you with this'; and 'I'm not your</p> <p>18 caseworker so can't help you'. But you never see your</p> <p>19 caseworker and the person giving you your report can't</p> <p>20 answer any of your questions. She didn't say anything</p> <p>21 encouraging, about appeals or things changing. She</p> <p>22 wasn't there to help me. Part of her job was not to</p> <p>23 give me hope, so I'd give up and sign papers to go</p> <p>24 somewhere where I'd die. I thought I'd rather die</p> <p>25 quickly here than being removed and dying slowly in</p> <p style="text-align: center;">Page 246</p>	<p>1 <b>I saw him was a timely threat, and the threat he's</b></p> <p>2 <b>giving now is more of an immediate threat, and I would</b></p> <p>3 <b>definitely open an ACDT then.</b></p> <p>4 Q. I don't think we need to bring it up again, but we just</p> <p>5 looked at a passage in the investigation report that</p> <p>6 said that you would make an assessment of whether</p> <p>7 somebody -- whether he was going to commit suicide or</p> <p>8 not --</p> <p>9 <b>A. Yes.</b></p> <p>10 Q. -- by looking at body language and deciding if they</p> <p>11 really meant the comment or not. You gave the example</p> <p>12 if they were shaking and of low mood, you would open an</p> <p>13 ACDT.</p> <p>14 <b>A. Yes.</b></p> <p>15 Q. Should an ACDT be opened if someone was demonstrating</p> <p>16 suicidal ideation?</p> <p>17 <b>A. If there's -- giving me the suicide threats, yes.</b></p> <p>18 Q. How do you know if a person really meant it or not?</p> <p>19 <b>A. As I said, I will assess and speak to them of why</b></p> <p>20 <b>they're making these threats, and if there's any way</b></p> <p>21 <b>I can try and calm them down and see if I can help them</b></p> <p>22 <b>out.</b></p> <p>23 Q. If someone said that they were going to kill themselves,</p> <p>24 would that help you with whether they really meant it or</p> <p>25 not?</p> <p style="text-align: center;">Page 248</p>

<p>1 <b>A. As I said, I would assess the situation and see what</b>  2 <b>their demeanour is at that time.</b>  3 Q. What about if they wrote a suicide note? Does that help  4 you with whether they really meant it or not?  5 <b>A. If they have already written one, yes.</b>  6 Q. So only if they'd already written one, not if they were  7 going to write one?  8 <b>A. If you're referring to D687, he said he was -- he gave</b>  9 <b>me -- he gave -- at that time, he gave me a timeframe.</b>  10 <b>He didn't say he was going to do it immediately. So</b>  11 <b>I tried to help him and talk it out with him, and that's</b>  12 <b>why I got my managers involved, just to put them on the</b>  13 <b>radar that he is a bit -- he's -- he's not happy with</b>  14 <b>the system.</b>  15 Q. Isn't there a formal way of putting mentally ill  16 detainees on the radar, by opening an ACDT?  17 <b>A. Yeah, that's why I -- I spoke to the Oscars, the</b>  18 <b>managers, to see whether the move I made was correct,</b>  19 <b>and at that time it was agreed that -- I did speak to my</b>  20 <b>manager and my manager said, "Yes, that's fine, we will</b>  21 <b>wait for G4S to see whether they will come back to us</b>  22 <b>and see what they have to say after speaking to him".</b>  23 Q. So you specifically asked your manager whether you  24 should open an ACDT or not?  25 <b>A. No, I spoke to my manager and, as I recall, I spoke to</b></p> <p style="text-align: center;">Page 249</p>	<p>1 interview that you had where you speak in particular  2 about training. Right at the top:  3 "She had had contractor training on ACDTs in  4 2016/17. It lasted a couple of hours and was classroom  5 training about when to open an ACDT and how to assess  6 whether or not to open one. It suggested that once  7 a threat was received the officer would then make an  8 assessment if the person would carry that through or  9 not. That would determine if an ACDT should be open.  10 She would send details of this. This was not refreshed  11 regularly. Ms Smith could not remember what her  12 thoughts had been when she had seen that the drug abuse  13 team had opened an ACDT a week later."  14 I should say, that's not the training -- that's not  15 exactly what -- the training that was given, but what  16 you thought that the training had said; is that right?  17 <b>A. I assume so, yes.</b>  18 Q. What I mean is, that's not a statement of what the  19 training was; that was what you thought the training was  20 at the time. Is that correct?  21 <b>A. I'm not getting what you're trying to ...</b>  22 Q. Sorry, perhaps I'm not expressing myself clearly. What  23 I have just read to you, is that an accurate statement  24 of what you thought the training was at the time in  25 2017?</p> <p style="text-align: center;">Page 251</p>
<p>1 <b>my manager and said, "This is what I have done. He has</b>  2 <b>made this threat. I have told G4S to speak to him and</b>  3 <b>then come back to me whether they believe that I should</b>  4 <b>open an ACDT or not because I believe I have calmed him</b>  5 <b>down".</b>  6 Q. Do you think that you are medically qualified to decide  7 whether a person really meant this or not?  8 <b>A. No.</b>  9 Q. If you are not qualified, why wouldn't you just err on  10 the side of caution?  11 <b>A. It's the -- because we have vulnerability training to</b>  12 <b>iron out vulnerability to see whether -- to see how the</b>  13 <b>demeanour of persons and to assess the situation, and at</b>  14 <b>that time, that was the training I got.</b>  15 Q. If somebody says they're going to commit suicide, says  16 they're going to write a -- he'd started writing  17 a suicide note, is that not enough in order to open an  18 ACDT?  19 <b>A. I assume if I was in that situation now, I would.</b>  20 Q. What's changed?  21 <b>A. Because I've had -- we had a follow-up training after</b>  22 <b>that, where -- one of the evidence as well says that</b>  23 <b>a follow-up training was given to staff.</b>  24 Q. I'm going to take you to the training now. If we can  25 please turn up &lt;HOM002505&gt;, page 2, please. This is an</p> <p style="text-align: center;">Page 250</p>	<p>1 <b>A. What was given to us at that time, yes.</b>  2 Q. Yes. Thank you. I want to take you then to the actual  3 policy that was in place at the time, at &lt;CJS006380&gt; and  4 it is page 12. It is paragraph 2.2, the second  5 paragraph down. This is the suicide prevention and  6 self-harm management policy. I just want to read one  7 short sentence from it. It is the second paragraph down  8 from 2.2:  9 "Suicide prevention and self-harm management is the  10 responsibility of all staff. Whenever any member of  11 staff believes a detainee is at risk of suicide or  12 self-harm, they must open an ACDT plan following the  13 procedures set out in the ACDT policy."  14 Were you aware of this policy at the time?  15 <b>A. When we had the training, it was just how to open an</b>  16 <b>ACDT, how to fill out the books and how -- where to send</b>  17 <b>it and how to report it.</b>  18 Q. But were you also trained when, when to open an ACDT?  19 <b>A. To be honest, I can't recall.</b>  20 Q. Do you agree that this is a low threshold for putting --  21 before opening an ACDT plan?  22 <b>A. I can't -- I don't know how to comment on that because</b>  23 <b>it's a contract monitoring side to do.</b>  24 Q. I'm not asking a question about the contract monitoring.  25 I'm saying that this policy says whenever a member of</p> <p style="text-align: center;">Page 252</p>

<p>1 staff believes a detainee is at a low -- sorry, is at</p> <p>2 a risk of suicide or self-harm, they must open an ACDT.</p> <p>3 What I'm suggesting to you, that that's a low</p> <p>4 threshold, so it is a low bar to have to meet in order</p> <p>5 for an ACDT to be opened: you only -- a person only has</p> <p>6 to be at risk of suicide.</p> <p>7 <b>A. No, I don't think. They could be -- they could threat</b></p> <p>8 <b>as well, yes.</b></p> <p>9 Q. So they could make a threat?</p> <p>10 <b>A. Make a threat as well, yes.</b></p> <p>11 Q. Yes. But that means -- a threat, we would assume, means</p> <p>12 that there is a risk of suicide, if someone makes</p> <p>13 a threat; do you agree?</p> <p>14 <b>A. Yeah, risk of suicide, yes.</b></p> <p>15 Q. Do you agree also that it should be precautionary, so</p> <p>16 you should, as I said earlier, err on the side of</p> <p>17 caution?</p> <p>18 <b>A. Sorry, repeat that again?</b></p> <p>19 Q. Do you agree that you should err on the side of caution?</p> <p>20 If you are not sure or not --</p> <p>21 <b>A. Yes.</b></p> <p>22 Q. -- whether somebody might or might not commit suicide --</p> <p>23 <b>A. Yes.</b></p> <p>24 Q. -- that you should err on the side of caution and</p> <p>25 therefore put someone on an ACDT?</p> <p style="text-align: center;">Page 253</p>	<p>1 have placed him on ACDT?</p> <p>2 <b>A. Looking at this, yes.</b></p> <p>3 Q. I want to ask you now about DCO David Waldock's</p> <p>4 allegations. If we can please bring up on screen</p> <p>5 &lt;VER000061&gt; and pages 4 to 5. This is a letter that was</p> <p>6 sent by DCO David Waldock to the CEO of G4S on</p> <p>7 15 April 2017. He was raising claims of bullying and</p> <p>8 corruption at Brook House.</p> <p>9 In terms of allegations against you, you will see</p> <p>10 the heading there -- it is quite hard to read because</p> <p>11 the headings aren't in bold. But you will see at the</p> <p>12 top there "Gayatri Mehraa", and then there are several</p> <p>13 allegations. I will read out the ones that are relevant</p> <p>14 to you. This is another person, of course, a DCO at</p> <p>15 Brook House, DCO Mehraa:</p> <p>16 "Having Home Office officials as personal friends in</p> <p>17 and out of work ie going to parties, drinks, dinners as</p> <p>18 their guests.</p> <p>19 "Falsifying documents with Home Office officials for</p> <p>20 her own purpose.</p> <p>21 "Working with and not disclosing personal levels of</p> <p>22 friendship with Home Office official [which] may</p> <p>23 interfere with work policies, ie, Vanessa Smith being</p> <p>24 one of her best friends.</p> <p>25 "Talking in her native tongue with Vanessa Smith</p> <p style="text-align: center;">Page 255</p>
<p>1 <b>A. We do have a process where if we think -- for example,</b></p> <p>2 <b>if a resident has a flight and we know he's going to be</b></p> <p>3 <b>disruptive, or he said, "If I have to go, I'll do this",</b></p> <p>4 <b>we put them on a raised concern list so that we are</b></p> <p>5 <b>aware when we are serving RDs, or, sorry, tickets, that</b></p> <p>6 <b>we know that they are going to be in that situation,</b></p> <p>7 <b>that things -- and then G4S monitors that.</b></p> <p>8 Q. You could also open an ACDT in that scenario?</p> <p>9 <b>A. Assume so, you can, yes.</b></p> <p>10 Q. Do you assume so or you would?</p> <p>11 <b>A. Well, if they are threatening that they're going to do</b></p> <p>12 <b>something -- because if it's -- if they say that they're</b></p> <p>13 <b>going to do it when they're going to fly, rather than</b></p> <p>14 <b>when -- they're going to do it now, it's a bit</b></p> <p>15 <b>different.</b></p> <p>16 Q. So you said earlier that it was a conditional threat</p> <p>17 that D687 had made.</p> <p>18 <b>A. Yes.</b></p> <p>19 Q. But you can see here in the policy that there isn't</p> <p>20 anything about a time bar?</p> <p>21 <b>A. Yeah.</b></p> <p>22 Q. It doesn't say "immediately at risk of suicide", does</p> <p>23 it?</p> <p>24 <b>A. No.</b></p> <p>25 Q. So do you accept now, in hindsight, that you ought to</p> <p style="text-align: center;">Page 254</p>	<p>1 when they don't want people to know what's going on."</p> <p>2 Turn over the page, please. If you just scroll</p> <p>3 down, please. There should be "Vanessa Smith.</p> <p>4 Home Office officer." Perhaps it is the next page.</p> <p>5 Yes:</p> <p>6 "Lied to cover up bullying by Gayatri and falsifying</p> <p>7 a complaint (proof can be provided).</p> <p>8 "Knowingly having a friendship with a DCO officer at</p> <p>9 Brook House and using it to influence decisions.</p> <p>10 "Accepting bribes and inappropriate gifts."</p> <p>11 I'll just summarise what you have said in your</p> <p>12 witness statement, if I may, in response to these</p> <p>13 allegations. You say at paragraphs 81 to 86 that you</p> <p>14 haven't seen the document before --</p> <p>15 <b>A. No.</b></p> <p>16 Q. -- this letter. That you are probably closest to</p> <p>17 DCO Mehraa -- can I just check I'm saying her name</p> <p>18 correctly? How do you say her name?</p> <p>19 <b>A. "Gayatri".</b></p> <p>20 Q. What's her second name?</p> <p>21 <b>A. Mehraa.</b></p> <p>22 Q. Mehraa?</p> <p>23 <b>A. Yes.</b></p> <p>24 Q. So you're probably closest to DCO Mehraa; not best</p> <p>25 friends; that you sometimes spoke in Hindi regarding</p> <p style="text-align: center;">Page 256</p>



<p>1 your personal life; and that you don't know what</p> <p>2 DCO Waldock is referring to when he lied -- when he said</p> <p>3 you lied to cover up bullying by DCO Mehraa or that you</p> <p>4 falsified a complaint.</p> <p>5 You say that you might have raised a complaint about</p> <p>6 DCO Waldock to the contract monitoring team sometime in</p> <p>7 the past because it was your job. Do you know what kind</p> <p>8 of complaint?</p> <p>9 <b>A. To be honest, I didn't even -- I don't remember what the</b></p> <p>10 <b>complaint was.</b></p> <p>11 Q. I want to then turn to &lt;VER000250&gt;, page 16, please. It</p> <p>12 is question 143 and answer 144:</p> <p>13 "Question: She has popped up, at all angles people</p> <p>14 have mentioned having had an issue with her."</p> <p>15 This is talking about DCO Mehraa:</p> <p>16 "She was abusive to detainees, she was abusive to</p> <p>17 officers, she was abusive to her colleagues and she</p> <p>18 abused the system, and I just wonder whether she should</p> <p>19 have been got rid of rather more quickly than she was?"</p> <p>20 "Answer: Yes, in my eyes possibly."</p> <p>21 Sorry, I should have explained, this is a Verita</p> <p>22 interview with DCO Dave Roffey?</p> <p>23 <b>A. Roffey, yes.</b></p> <p>24 Q. So the answer is:</p> <p>25 "Answer: Yes, in my eyes possibly. She was like</p> <p style="text-align: center;">Page 257</p>	<p>1 <b>A. I wouldn't know that because, as I said, my only --</b></p> <p>2 <b>I only had a brief time of when I used to see her during</b></p> <p>3 <b>my interviews.</b></p> <p>4 Q. Michelle Brown says that:</p> <p>5 "This demonstrated ..."</p> <p>6 "This" being the starting of the -- the suggestion</p> <p>7 of starting a petition:</p> <p>8 "This demonstrated to me that there is a blurred</p> <p>9 line of professional and personal relationships."</p> <p>10 Would you agree with Michelle Brown that there was</p> <p>11 a blurred line of professional and personal</p> <p>12 relationships?</p> <p>13 <b>A. As I've mentioned previously, that I thought she was</b></p> <p>14 <b>very efficient: she got our residents up on time, and</b></p> <p>15 <b>that's why I thought she was good at the visit area.</b></p> <p>16 Q. And Dave Roffey there has said, in the last line of</p> <p>17 the document we just looked at:</p> <p>18 "... there was a fear among ... staff that, if you</p> <p>19 said anything about Gayatri, things could happen to</p> <p>20 you."</p> <p>21 Do you know what he is referring to?</p> <p>22 <b>A. I wouldn't know because I didn't have much interaction</b></p> <p>23 <b>with other G4S staff, besides the people who were in</b></p> <p>24 <b>visits.</b></p> <p>25 MS TOWNSHEND: Chair, I just have a couple more questions.</p> <p style="text-align: center;">Page 259</p>
<p>1 a silent assassin - all smiley and lovely with</p> <p>2 management but you are actually working there. I think</p> <p>3 there was a fear among staff that, if you said anything</p> <p>4 about Gayatri, things could happen to you."</p> <p>5 If that could come down, thank you.</p> <p>6 Michelle Brown, in her witness statement -- I won't</p> <p>7 bring it up, for time reasons -- at paragraph 20</p> <p>8 suggested that you started a petition to get DCO Mehraa</p> <p>9 moved back to visits. She had been taken off visits due</p> <p>10 to an investigation about falsifying visits. Is it</p> <p>11 correct that you started a petition, or, rather, you</p> <p>12 were suggesting that you should start a petition?</p> <p>13 <b>A. I possibly did; only because I thought that Gayatri</b></p> <p>14 <b>Mehraa at that -- at visits, she always brought up the</b></p> <p>15 <b>residents on time, she was efficient when we -- when</b></p> <p>16 <b>Home Office around, and I only briefly used to see her</b></p> <p>17 <b>when I used to go down for my interviews to the visit</b></p> <p>18 <b>area, and then I used to go back up to the office. But,</b></p> <p>19 <b>in the brief time I was in visits, I -- she always got</b></p> <p>20 <b>our residents up on time and seemed efficient.</b></p> <p>21 Q. So did you suggest that you should start a petition to</p> <p>22 get her back onto visits?</p> <p>23 <b>A. To be honest, I can't recall, but possibly I could have.</b></p> <p>24 Q. Were you aware that she was abusive to detained persons</p> <p>25 and staff?</p> <p style="text-align: center;">Page 258</p>	<p>1 I appreciate that it's getting late.</p> <p>2 THE CHAIR: Thank you.</p> <p>3 MS TOWNSHEND: Final brief topic: changes since Panorama.</p> <p>4 You have said that there are two changes. One is that</p> <p>5 the DES compliance team, with regards to the</p> <p>6 Home Office, is much bigger; and the second, you said,</p> <p>7 "The change is that we switched to Serco," so the centre</p> <p>8 is now run by Serco.</p> <p>9 <b>A. Yes.</b></p> <p>10 Q. You said in your witness statement at paragraph 116 that</p> <p>11 all these changes are for the better. Is Brook House</p> <p>12 being managed by Serco better than G4S?</p> <p>13 <b>A. To be honest, I can't comment on that because I don't</b></p> <p>14 <b>have much interactions, because since Covid hit and</b></p> <p>15 <b>Serco changed, I was working from home. So I've just</b></p> <p>16 <b>recently, I think last year, went back into the office,</b></p> <p>17 <b>but I didn't have any interaction because I do all my</b></p> <p>18 <b>interviews over the phone, but I know that DES team is</b></p> <p>19 <b>managing them every move they make.</b></p> <p>20 Q. So why did you say when it switched to Serco these</p> <p>21 things are changed for the better?</p> <p>22 <b>A. Because when I call -- like, for example, if I ask the</b></p> <p>23 <b>Serco staff, in the sense of telephone interviews, "Can</b></p> <p>24 <b>you produce the resident or bring them to the office so</b></p> <p>25 <b>I can speak to them and give them the paperwork", in</b></p> <p style="text-align: center;">Page 260</p>

1       **that way they're efficient, they would do it.**  
2       Q. More efficient than when it was run by G4S?  
3       **A. Yes, I would believe so, yes.**  
4       MS TOWNSHEND: Thank you, Ms Smith. I don't have any more  
5       questions. Chair, do you have any questions.  
6       THE CHAIR: I don't have any questions for you, Ms Smith.  
7       Thank you very much.  
8       **A. Thank you.**  
9       THE CHAIR: I'm very sorry that we have kept you waiting  
10      today.  
11      **A. That's okay.**  
12      THE CHAIR: And I appreciate it is a longer day than you  
13      thought it was going to be, but I'm grateful for you  
14      coming to give your evidence.  
15      **A. Thank you.**  
16                **(The witness withdrew)**  
17      MS TOWNSHEND: Chair, we will resume at 10.00 am with  
18      Jules Williams.  
19      THE CHAIR: Thank you very much, Ms Townshend. Thank you.  
20      See you tomorrow.  
21      (5.09 pm)  
22                (The hearing was adjourned to  
23      Wednesday, 16 March 2022 at 10.00 am)  
24  
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