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| <p>1 Monday, 21 March 2022</p> <p>2 (10.00 am)</p> <p>3 MR JEREMY KENNETH PETHERICK (sworn)</p> <p>4 Examination by MR ALTMAN</p> <p>5 MR ALTMAN: Mr Petherick, give us your full name, first of</p> <p>6 all, if you would, please.</p> <p>7 A. Jeremy Kenneth Petherick.</p> <p>8 Q. Mr Petherick, you have made a statement to the inquiry</p> <p>9 dated 17 February. You should have it in front of you.</p> <p>10 Chair, our reference is <CJS0074047>, and I invite you</p> <p>11 to adduce it in full.</p> <p>12 THE CHAIR: Thank you.</p> <p>13 MR ALTMAN: Mr Petherick, let's just look, first of all, at</p> <p>14 the second paragraph of your statement. It is not</p> <p>15 paginated, so when we go to it, we will have to go to</p> <p>16 paragraph numbers. But paragraph 2 sets out a summary</p> <p>17 of your career, and I suppose we should start from the</p> <p>18 bottom, which is the final of about half a dozen, maybe</p> <p>19 a little more, bullet points.</p> <p>20 A. Indeed.</p> <p>21 Q. You say, from 1982 to 1993, you had various posts in the</p> <p>22 grades of assistant governor through to deputy governor,</p> <p>23 including operational postings ranging from youth</p> <p>24 custody centres to high-security establishments, and you</p> <p>25 had one period in the human resources section of</p> <p style="text-align: center;">Page 1</p> | <p>1 College of Defence Studies. Then from January 2000</p> <p>2 to July 2005, Area Manager, South-West, for HMPS,</p> <p>3 Her Majesty's Prison Service. From July 2005</p> <p>4 to May 2008, you were the managing director of</p> <p>5 the Offender Management & Immigration Services, GSL (UK)</p> <p>6 Limited.</p> <p>7 Pausing there, GSL was the company which won the</p> <p>8 contract for the Gatwick Immigration Removal Centres,</p> <p>9 but the company was taken over by G4S?</p> <p>10 A. It was subsequently purchased by G4S. I should point</p> <p>11 out that, during that time with GSL, I wasn't always in</p> <p>12 command of the immigration services. That came partway</p> <p>13 through that period.</p> <p>14 Q. But, as a matter of fact, you agree GSL won the</p> <p>15 contract, but G4S bought GSL and, therefore, the</p> <p>16 contract became G4S's?</p> <p>17 A. Correct. It novated to G4S.</p> <p>18 Q. That was February 2008, I think, when the contract was</p> <p>19 at least --</p> <p>20 A. Yes, it would be.</p> <p>21 Q. Well, we will see reference to 11 February 2008 as the</p> <p>22 date of the contract. Whether that's the date of</p> <p>23 the contract with GSL or when it was novated to G4S, can</p> <p>24 you help?</p> <p>25 A. I believe that was the date that GSL began to operate</p> <p style="text-align: center;">Page 3</p> |
| <p>1 Her Majesty's Prison Service headquarters. Do we take</p> <p>2 from that that you started your career in the</p> <p>3 Prison Service?</p> <p>4 A. I did. I joined the Prison Service in 1982 as a direct</p> <p>5 entrant assistant governor, and then worked my way</p> <p>6 through those various grades, those various postings.</p> <p>7 Q. If we climb up these bullet points, the next</p> <p>8 is February 1993 to June 1998, you were the governor at</p> <p>9 Her Majesty's -- "RC"?</p> <p>10 A. "Remand centre".</p> <p>11 Q. Remand centre in Reading. June 1995 to December 1995,</p> <p>12 governor at Her Majesty's Prison Channings Wood.</p> <p>13 Then March 1998, you say, to December 1998, head of</p> <p>14 Her Majesty's Prison Services Security Group?</p> <p>15 A. Correct.</p> <p>16 Q. So it appears that overlapped with part of your</p> <p>17 governorship at Channings Wood?</p> <p>18 A. Yes. I probably moved mid month, or something like</p> <p>19 that. I took up post as the head of the security group</p> <p>20 where I had various responsibilities, ranging from</p> <p>21 security advice to -- I was the chair of the use of</p> <p>22 force committee, and so responsible for control and</p> <p>23 restraint training, and so forth.</p> <p>24 Q. January 1999 to the following year, January 2000, you</p> <p>25 were a Member of the Senior Command Course at the Royal</p> <p style="text-align: center;">Page 2</p> | <p>1 Brook House.</p> <p>2 Q. Then, finally, in terms of your career insofar as this</p> <p>3 witness statement goes, from May 2008 to August 2019,</p> <p>4 you were the managing director of G4S Custodial &</p> <p>5 Detention Services, abbreviated as C&DS?</p> <p>6 A. Correct.</p> <p>7 Q. If you don't mind me asking, Mr Petherick, your position</p> <p>8 now?</p> <p>9 A. I'm retired.</p> <p>10 Q. When did you retire?</p> <p>11 A. I need to -- August 2019.</p> <p>12 Q. So it was when you finished your --</p> <p>13 A. Yes.</p> <p>14 Q. -- stint as MD --</p> <p>15 A. Yes.</p> <p>16 Q. -- at G4S. All of which suggests, Mr Petherick, that</p> <p>17 you had -- and perhaps, since August 2019, your muscle</p> <p>18 memory for Custodial & Detention Services has faded</p> <p>19 somewhat?</p> <p>20 A. To a degree, although I still undertake some consultancy</p> <p>21 work which keeps me aware and I do some pro bono work</p> <p>22 for charities.</p> <p>23 Q. Right. What's the nature of the work that you do?</p> <p>24 A. It varies, from advice on the operation of</p> <p>25 establishments to other commercial matters.</p> <p style="text-align: center;">Page 4</p> |

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| <p>1 Q. Private sector or public sector?</p> <p>2 A. Private sector.</p> <p>3 Q. In the custodial and detention environment?</p> <p>4 A. Primarily, yes.</p> <p>5 Q. But all of which, I'm sure you will agree, Mr Petherick,</p> <p>6 suggests that you had a deep understanding of custodial</p> <p>7 institutions?</p> <p>8 A. I would hope so.</p> <p>9 Q. And the risks that -- the risk factors which abound</p> <p>10 within them?</p> <p>11 A. Yes.</p> <p>12 Q. And, doubtless, that they can become hotbeds for abuse</p> <p>13 of detainees or prisoners?</p> <p>14 A. No, I think that's unfair, because that would suggest</p> <p>15 that's widespread and so forth, and it is not. I would</p> <p>16 make it very clear that the vast majority of people</p> <p>17 working in the sector do so with great care, concern and</p> <p>18 so forth. So I wouldn't accept that there's any</p> <p>19 indication of a widespread system of abuse.</p> <p>20 Q. You are familiar with the Detention Centre Rules, or you</p> <p>21 presumably were?</p> <p>22 A. Probably "were" is a better description, yes.</p> <p>23 Q. You may remember that rule 3(1) says:</p> <p>24 "The purpose of detention centres shall be to</p> <p>25 provide for the secure but humane ..."</p> <p style="text-align: center;">Page 5</p> | <p>1 A. Yes.</p> <p>2 Q. Medway?</p> <p>3 A. No, it was Oakhill. In fairness, I had responsibility</p> <p>4 for the final month of Medway's operation because the</p> <p>5 managing director for the Children's Services Division</p> <p>6 had left and so I took Medway's -- responsibility for</p> <p>7 the final month of that contract.</p> <p>8 Q. So that we are clear, because we will come back to</p> <p>9 Medway, did G4S have responsibility, have the contract</p> <p>10 for Medway, during the period that you were managing</p> <p>11 director?</p> <p>12 A. G4S had responsibility. I did not have responsibility,</p> <p>13 other than the final month.</p> <p>14 Q. When you say "the final month", what do you mean by</p> <p>15 that?</p> <p>16 A. The final month that G4S held the contract for.</p> <p>17 Q. Which was?</p> <p>18 A. Oh, it was June 2016, as I recall. Mid June, I believe</p> <p>19 the contract was finalised.</p> <p>20 Q. You mean another company got it?</p> <p>21 A. No, it was closed.</p> <p>22 Q. Oh, it closed, did it?</p> <p>23 A. Yes.</p> <p>24 Q. Who was the other person whose responsibility Medway</p> <p>25 was?</p> <p style="text-align: center;">Page 7</p> |
| <p>1 A. Yes.</p> <p>2 Q. "... accommodation of detained persons in a relaxed</p> <p>3 regime with as much freedom of movement and association</p> <p>4 as possible ..."</p> <p>5 A. Indeed.</p> <p>6 Q. "... consistent with maintaining a safe and secure</p> <p>7 environment, and to encourage and assist detained</p> <p>8 persons to make the most productive use of their time,</p> <p>9 whilst respecting in particular their dignity and</p> <p>10 the right to individual expression."</p> <p>11 There is, if you like, the overarching policy</p> <p>12 statement about which detention centres or the way in</p> <p>13 which detention centres should be run.</p> <p>14 Tell us this: when you were managing director of</p> <p>15 Custodial & Detention Services for G4S, what was your</p> <p>16 domain, your geographical domain? In other words, over</p> <p>17 how many establishments were you managing director?</p> <p>18 A. My domain was England and Wales. I had five prisons and</p> <p>19 the Gatwick Immigration Centre. At one stage, we had</p> <p>20 other -- or GSL had other detention centres, such as at</p> <p>21 Campfield House, and one STC which compared to the</p> <p>22 13 establishments that I had responsibility for as area</p> <p>23 manager for the Prison Service.</p> <p>24 Q. The one STC, secure training centre -- is that what you</p> <p>25 mean?</p> <p style="text-align: center;">Page 6</p> | <p>1 A. Named in the documentation, Paul Cook.</p> <p>2 Q. Paul Cook. I have reminded you of the terms of</p> <p>3 Detention Centre Rules, rule 3, about detention centres</p> <p>4 being "to provide for the secure but humane</p> <p>5 accommodation of detained persons in a relaxed regime".</p> <p>6 Looking back now, Mr Petherick, do you think that</p> <p>7 Brook House fulfilled those requirements?</p> <p>8 A. In large parts, yes; in other parts, no, and I have</p> <p>9 obviously watched the Panorama programme when it didn't.</p> <p>10 But, in large parts -- and one of my annoyances about</p> <p>11 the programme is the fact that the very good work that</p> <p>12 many of the staff, the majority of the staff, there did.</p> <p>13 So I can't give a simple yes or no answer, because it</p> <p>14 does vary.</p> <p>15 Q. The relevant period, for the purposes of this inquiry,</p> <p>16 as you will know, is the beginning of April to the end</p> <p>17 of August 2017. If we narrow the compass from</p> <p>18 everything you know to that period of time, do you think</p> <p>19 that Brook House fulfilled the requirements of rule 3</p> <p>20 during that period?</p> <p>21 A. Not in its entirety, because we have all seen the</p> <p>22 programme. But during that period, I am also certain</p> <p>23 that there was good care and concern given to some other</p> <p>24 detainees, because we are talking about the actions of</p> <p>25 a small group of people.</p> <p style="text-align: center;">Page 8</p> |

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| <p>1 Q. Well, you're right, because you will know, I suspect,</p> <p>2 that Callum Tulley himself, who was the undercover</p> <p>3 reporter, said they weren't all bad apples?</p> <p>4 A. Indeed.</p> <p>5 Q. And that is something that you presumably would agree</p> <p>6 with?</p> <p>7 A. I would.</p> <p>8 Q. But there were enough of them, you will agree, I'm sure,</p> <p>9 to make the lives of certain detained men and the</p> <p>10 overall regime at Brook House totally unacceptable?</p> <p>11 A. I would agree that the actions of those people that we</p> <p>12 saw were totally unacceptable.</p> <p>13 Q. But you won't agree that the regime itself -- in other</p> <p>14 words, the whole environment -- at Brook House became</p> <p>15 unacceptable during the period or outwith the policy</p> <p>16 statement, as it were, within rule 3 of the Detention</p> <p>17 Centre Rules?</p> <p>18 A. No, I don't agree that the entirety did, because, as</p> <p>19 I say, there was good care and concern given to</p> <p>20 detainees throughout the period. That's nothing in the</p> <p>21 way of mitigation of the actions of those people that we</p> <p>22 saw.</p> <p>23 Q. Turning to something else, Mr Petherick, which I'm asked</p> <p>24 to ask you on behalf of core participants, would you be</p> <p>25 briefed, or were you briefed, I suppose I should be</p> <p style="text-align: center;">Page 9</p> | <p>1 A. I would be aware, but in the form of a formal briefing,</p> <p>2 no.</p> <p>3 Q. Were the results or the outcomes of those cases ever</p> <p>4 brought to your attention?</p> <p>5 A. I believe I can recall a couple, but I don't believe it</p> <p>6 was a regular form of briefing.</p> <p>7 Q. Thinking about it now, if there were High Court cases</p> <p>8 which touched on the detention of people, either in</p> <p>9 Brook House or other detention centres which were within</p> <p>10 your remit, where a High Court judge determined that</p> <p>11 that person's detention, or an aspect of that person's</p> <p>12 detention, was in breach of article 3, oughtn't that not</p> <p>13 be something that should have been brought to your</p> <p>14 attention in detail so that you could deal with it?</p> <p>15 A. Not necessarily, if it was related to whether an</p> <p>16 individual should be detained at all, that is a matter</p> <p>17 for the Home Office, not for me. We had no power over</p> <p>18 the number or the backgrounds of the detainees who were</p> <p>19 sent to us for detention.</p> <p>20 Q. What if the litigation was about the conditions of</p> <p>21 detention at Brook House or related to, for example,</p> <p>22 torture or inhumane and degrading treatment under</p> <p>23 article 3? Would that not be something that you should</p> <p>24 have been apprised of?</p> <p>25 A. Yes, and I cannot recall anyone ever being accused of</p> <p style="text-align: center;">Page 11</p> |
| <p>1 asking you now, in light of your retirement in 2019,</p> <p>2 would you be briefed, or would you have been briefed, on</p> <p>3 High Court litigation, judicial reviews, in relation to</p> <p>4 Brook House, such as one case which I am asked to ask</p> <p>5 you about, HA (Nigeria) v The Secretary of State for the</p> <p>6 Home Department, which was decided in April 2012, where</p> <p>7 two periods of a detained man's detention were declared</p> <p>8 unlawful under the Human Rights Act and article 3 of</p> <p>9 the European Convention? Do you know anything about</p> <p>10 that, or, if you don't know about that case in</p> <p>11 particular, were you regularly briefed, or briefed not</p> <p>12 at all, in relation to litigation in relation to</p> <p>13 article 3 claims in the High Court?</p> <p>14 A. The answer to the first part of that question is, no,</p> <p>15 I'm not aware of that case. In answer to the second</p> <p>16 part, there would be discussions, and so forth, but in</p> <p>17 the form of a formal briefing, no.</p> <p>18 Q. That case wasn't the only one that went through the</p> <p>19 courts. There have been others. There may well have</p> <p>20 been many others in relation to the domain that I asked</p> <p>21 you about a little earlier, Mr Petherick. Were none of</p> <p>22 those ever brought to your attention? I mean, you must</p> <p>23 have known if G4S or not G4S but the Home Secretary was</p> <p>24 the defendant to a claim that a particular detained</p> <p>25 person's detention was in breach of article 3?</p> <p style="text-align: center;">Page 10</p> | <p>1 torturing people at Brook House or at any of my other</p> <p>2 centres. I would welcome any details of that.</p> <p>3 Q. What about conditions of detention such as cleanliness,</p> <p>4 hygiene, lavatories, showers, all of those things, which</p> <p>5 go into the melting pot of the conditions of an</p> <p>6 individual's detention?</p> <p>7 A. All of those things, and together with the length of</p> <p>8 time out of detainees' rooms, I can recall significant</p> <p>9 discussions about that.</p> <p>10 Q. During our period or before then?</p> <p>11 A. Ooh, I honestly can't remember, so I don't want to guess</p> <p>12 at that.</p> <p>13 Q. Let me understand something else about your position.</p> <p>14 Do you remember giving an interview to Verita</p> <p>15 in December --</p> <p>16 A. I do.</p> <p>17 Q. -- 2017? This will be one of several documents</p> <p>18 I suspect we will be putting up on screen for you,</p> <p>19 Mr Petherick. If we can put up <VER000263> at page 10.</p> <p>20 You will see -- you have presumably looked at this</p> <p>21 interview, or some of it, in preparation for giving your</p> <p>22 evidence?</p> <p>23 A. I have.</p> <p>24 Q. You see at 147 at the top, Mr Marsden was asking you</p> <p>25 a question about Yarl's Wood. It is the last three</p> <p style="text-align: center;">Page 12</p> |

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| <p>1 lines of your answer I'm interested in:</p> <p>2 "I should say I guess I have been a Gold Commander</p> <p>3 since '98, I think it is, so I know the people, and</p> <p>4 inevitably there is a network of conversation that goes</p> <p>5 on."</p> <p>6 Just picking up those words, "Gold Commander",</p> <p>7 because sometimes we see it at the head of certain</p> <p>8 meeting documents. What did it mean, as far as you're</p> <p>9 concerned, that, since '98, you have been a gold</p> <p>10 commander? What did that signify?</p> <p>11 A. The post the Strangeways incident of some 25 years ago,</p> <p>12 the entire system of incident management was changed to</p> <p>13 follow, really, what was a police model, whereby you had</p> <p>14 various levels of control -- bronze, silver and gold.</p> <p>15 Bronze are the people at the site of the incident -- you</p> <p>16 may have a hostage negotiator bronze, an intervention</p> <p>17 bronze, and so forth. The silver commander is the</p> <p>18 person in charge on the site of the establishment. The</p> <p>19 gold commander is above that, generally remote from the</p> <p>20 establishment and is responsible for more strategic</p> <p>21 advice and the acronym was, as I recall, SARA, which the</p> <p>22 gold commander's role was to support the silver</p> <p>23 commander, to advise, to resource, ie, provide resources</p> <p>24 if needs be, and so authorise, whether it was an</p> <p>25 intervention of the national Tornado teams or whatever.</p> <p style="text-align: center;">Page 13</p> | <p>1 Q. If it is the same one I had in mind, that was 17 May --</p> <p>2 A. Right. I can't --</p> <p>3 Q. -- when an individual was protesting on the netting.</p> <p>4 A. Yes. I can't say definitively. I have no recall of it,</p> <p>5 so I doubt that I was.</p> <p>6 Q. But so that we are clear, if it wasn't Lee Hanford and</p> <p>7 if it wasn't Pete Small, it would be you --</p> <p>8 A. Correct.</p> <p>9 Q. -- who would authorise the Nationals coming in to deal</p> <p>10 with --</p> <p>11 A. The system -- sorry.</p> <p>12 Q. -- that kind of situation, if needed?</p> <p>13 A. The system -- it becomes slightly more complicated when</p> <p>14 it is a private sector establishment, because, as area</p> <p>15 manager, in my previous public sector days, I would be</p> <p>16 able to call on the Tornado teams. The private sector,</p> <p>17 because the Tornado teams are primarily staff coming</p> <p>18 from public sector establishments, and therefore it's</p> <p>19 the -- well, it's all the Prison Service's staff, I, as</p> <p>20 a gold commander, would make a request to the duty</p> <p>21 operational officer at HMPPS, who would then refer it to</p> <p>22 their duty gold commander, to agree or disagree about</p> <p>23 the deployment.</p> <p>24 You then come through the period and the actual</p> <p>25 intervention plan that has to be signed off before</p> <p style="text-align: center;">Page 15</p> |
| <p>1 So I began my gold commander role on rotation back in</p> <p>2 '98 in the public sector, and then, when I moved to the</p> <p>3 private sector and there was a significant incident, we</p> <p>4 mirrored that structure. So I became the gold commander</p> <p>5 on rotation in that way. This was a system, as I said</p> <p>6 earlier, that I recall from when I was head of</p> <p>7 the Prison Service Security Group, which was actually</p> <p>8 when I first started on the rotation of gold commanders.</p> <p>9 Q. So were you on rotation gold commander for Brook House</p> <p>10 during the period that we are thinking about?</p> <p>11 A. I'm sure I was from time to time, because within the</p> <p>12 company, as I recall, there were three of us who rotated</p> <p>13 on a weekly basis that command.</p> <p>14 Q. Who were the other two?</p> <p>15 A. There was Lee Hanford and, as I recall, Pete Small.</p> <p>16 Q. Do you remember on any occasions when you were gold</p> <p>17 commander during the period we are looking at -- and</p> <p>18 I appreciate this is a difficult question,</p> <p>19 Mr Petherick -- but when you were called upon to</p> <p>20 authorise, for example, the national Tornado team coming</p> <p>21 into Brook House?</p> <p>22 A. No, I don't believe I was. I can have a recall of the</p> <p>23 Tornado team coming in to an "at height" -- we saw that</p> <p>24 on the TV. I don't believe I was the gold commander at</p> <p>25 that time, but I can't say definitively.</p> <p style="text-align: center;">Page 14</p> | <p>1 invention can take place, and that would be a dual</p> <p>2 signature in those circumstances. Generally, I would</p> <p>3 liaise with my public sector colleague gold and we would</p> <p>4 agree the plan and we would both sign it off.</p> <p>5 Q. Who would brief you about the need for it?</p> <p>6 A. The silver commander, primarily.</p> <p>7 Q. And what level in Brook House would that be found?</p> <p>8 A. That would be a duty director upwards.</p> <p>9 Q. So that could include the centre director, presumably,</p> <p>10 Ben Saunders?</p> <p>11 A. Indeed.</p> <p>12 Q. Steve Skitt --</p> <p>13 A. Yes.</p> <p>14 Q. -- who was a deputy director? Any other names that you</p> <p>15 remember?</p> <p>16 A. Oh, there were people -- all of the duty directors, from</p> <p>17 Nathan Ward to -- oh, gosh, Sarah Brown --</p> <p>18 Q. Sarah Newland?</p> <p>19 A. Sarah Newland. I'd have to remind myself. But all of</p> <p>20 those who undertook duty director roles could, and</p> <p>21 would, phone the gold commander up to make those</p> <p>22 requests.</p> <p>23 Q. Let's move away from that. You have been asked to</p> <p>24 consider some quarterly executive board meetings.</p> <p>25 A. Mmm-hmm.</p> <p style="text-align: center;">Page 16</p> |

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| <p>1 Q. Tell us about those, if you would. Who attended?</p> <p>2 A. These were senior officials from the Home Office, and</p> <p>3 people -- senior people from G4S. This was one of</p> <p>4 a series of such meetings that the Home Office</p> <p>5 instituted with all of the contractors. So we would</p> <p>6 meet quarterly to discuss all of the Home Office</p> <p>7 contracts held by the relevant company, ie, G4S in this</p> <p>8 case.</p> <p>9 Q. What was their overarching purpose? You deal with this</p> <p>10 in a little detail in paragraph 25 of your witness</p> <p>11 statement, if that helps you.</p> <p>12 A. Thank you. Yes. As I say here, it was a senior</p> <p>13 oversight board. The purpose was to discuss the running</p> <p>14 of contracts, to "horizon scan", as I say here.</p> <p>15 Q. What does that mean?</p> <p>16 A. Well, to look at what's coming down the tracks at either</p> <p>17 the Home Office or to us, to have a feel for the nuances</p> <p>18 of the system.</p> <p>19 Q. Yes.</p> <p>20 A. It was a very useful opportunity to have those</p> <p>21 discussions. Prior to the meeting, we would</p> <p>22 independently assess our contracts, and on a number of</p> <p>23 areas, and give our thoughts on them. We would then</p> <p>24 have a discussion about that.</p> <p>25 Q. Were these typically lengthy meetings?</p> <p style="text-align: center;">Page 17</p> | <p>1 I think they were interested, very interested, in the</p> <p>2 delivery of the removal system. I believe that they</p> <p>3 were interested in how we were operating the contract.</p> <p>4 So a whole range of things. It's difficult to give</p> <p>5 a specific, and I would expect that at this level, that</p> <p>6 there would be a range of interests.</p> <p>7 Q. Did you think the Home Office cared about the people you</p> <p>8 were detaining?</p> <p>9 A. Ultimately, yes.</p> <p>10 Q. Ultimately?</p> <p>11 A. Ultimately, yes. Why I say "ultimately" is, we have to</p> <p>12 remember that one of the purposes of Brook House and</p> <p>13 other immigration removal centres is to ensure that we</p> <p>14 were playing properly our role in the removal of</p> <p>15 detainees to their home countries, or, indeed, their</p> <p>16 admission into the UK.</p> <p>17 Q. It is just that -- for example, can we put up on screen,</p> <p>18 and you may have seen this in the documentation,</p> <p>19 <VER000226> at page 20, please. This is an interview</p> <p>20 with Ben Saunders by Verita. At answer 249, he says:</p> <p>21 "Frankly, the Home Office didn't really care about</p> <p>22 the people we looked after, and that's a very general</p> <p>23 kind of comment and I wouldn't want it quoted in that</p> <p>24 way in the report. There are elements of people in the</p> <p>25 Home Office who did care very much, but the Home Office</p> <p style="text-align: center;">Page 19</p> |
| <p>1 A. Oh, they would take up to half a day.</p> <p>2 Q. What level of person did you meet with from the</p> <p>3 Home Office?</p> <p>4 A. As I recall, and I may have their grading structure</p> <p>5 incorrect, but deputy director level.</p> <p>6 Q. As suggested, they took place quarterly?</p> <p>7 A. Mmm-hmm.</p> <p>8 Q. What, at the beginning of the quarter in each case, or</p> <p>9 at the end of the quarter?</p> <p>10 A. I cannot remember. Probably at the end, because it</p> <p>11 was -- it formed both a retrospective view of where the</p> <p>12 contract was, and, as I say, a look forward as to future</p> <p>13 developments. I would attend with my line manager and</p> <p>14 other MD colleagues who held Home Office contracts.</p> <p>15 Q. What was your view overall, Mr Petherick, when we think</p> <p>16 about the Home Office? We will come back to aspects of</p> <p>17 the contract a little later, but in terms of</p> <p>18 the Home Office, what was their focus, as regards</p> <p>19 Brook House? What was the thing that most concerned</p> <p>20 them, do you think?</p> <p>21 A. I think there were a range of foci, and I would expect</p> <p>22 that. Some of it was about ensuring that we were</p> <p>23 delivering as per the contract. I think we all accepted</p> <p>24 that the contract -- and contracts generally are</p> <p>25 a function of the age at which they were signed.</p> <p style="text-align: center;">Page 18</p> | <p>1 entity corporately was mostly concerned about the</p> <p>2 removal process and the functionality of it."</p> <p>3 Do you agree with that?</p> <p>4 A. Not entirely, no.</p> <p>5 Q. Which parts do you disagree with?</p> <p>6 A. I think "mostly concerned", yes, there was real concern</p> <p>7 about making sure we were playing our role. I don't</p> <p>8 believe that would overarchingly mean that people didn't</p> <p>9 care about individuals.</p> <p>10 Q. He goes on to say, when that answer is played back to</p> <p>11 him:</p> <p>12 "Answer: Or didn't appear to, maybe. We had</p> <p>13 a number of examples. For example, I can remember a guy</p> <p>14 who was released and he wouldn't leave and we were told</p> <p>15 that we should restrain him out of the door onto the</p> <p>16 road, and we just refused to do it. We were patient</p> <p>17 with him. We can't do that. I don't believe in that</p> <p>18 kind of practice."</p> <p>19 So he was giving an example there of perhaps when he</p> <p>20 was given an instruction about the removal of</p> <p>21 a particular individual, but he failed to carry out the</p> <p>22 instruction.</p> <p>23 So, as far as you're concerned, Mr Petherick, there</p> <p>24 were different levels, if you like, that everybody --</p> <p>25 the Home Office and G4S -- had a job to do. The</p> <p style="text-align: center;">Page 20</p> |

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| <p>1 Home Office's job was to detain people until they were</p> <p>2 removed from the jurisdiction, and G4S's job was to</p> <p>3 detain them in conditions, as we saw, subject to rule 3,</p> <p>4 and to remove them at the instruction of</p> <p>5 the Home Office?</p> <p>6 A. And, on occasion, as per this occasion, and I can recall</p> <p>7 other occasions, when we did more than we were</p> <p>8 contracted to do, if you want to put it that way, and we</p> <p>9 made sure of the welfare of the individual. And so</p> <p>10 we -- I can remember several occasions when, for</p> <p>11 example, we might have paid for a taxi -- and I can</p> <p>12 recall that -- home. We made sure that they got to the</p> <p>13 Gatwick railway station, and things such as that.</p> <p>14 Because my belief, and many of my colleagues' beliefs,</p> <p>15 is that we actually do care for the individual.</p> <p>16 I didn't change my views on doing that when I moved from</p> <p>17 the public sector to the private sector. They have</p> <p>18 always been part of my role and my belief structure, and</p> <p>19 this is one example of where we went above and beyond,</p> <p>20 and rightly so, and I commend the people for doing so.</p> <p>21 Q. That's G4S. I was asking about the Home Office.</p> <p>22 A. I know, from conversations I've had with Home Office</p> <p>23 officials, that they also cared. Now, I don't know, in</p> <p>24 this case, who gave that instruction locally, at what</p> <p>25 level that instruction was given. But I know very well</p> <p style="text-align: center;">Page 21</p> | <p>1 costs.</p> <p>2 We then go into a different period, and there's</p> <p>3 a different emphasis, and I believe with the IRCs,</p> <p>4 that's where we are at the moment. But certainly my</p> <p>5 recollection is, at the time at which the Brook House</p> <p>6 contract was awarded, it was primarily done on price,</p> <p>7 and you mentioned earlier on about the GSL/G4S issue.</p> <p>8 My recollection is that G4S bid for the contract, were</p> <p>9 unsuccessful in winning the contract, and that was,</p> <p>10 I imagine -- I don't have the detail, but I imagine --</p> <p>11 primarily because they were more expensive. So, during</p> <p>12 the time when that contract was awarded, I think price</p> <p>13 was a major determinant.</p> <p>14 Q. Which is an interesting point, isn't it, because it</p> <p>15 rather suggests that GSL wins the contract because it</p> <p>16 underbids G4S. G4S, with an overbid, doesn't win in the</p> <p>17 procurement process, yet it can take out GSL by buying</p> <p>18 them, and presumably G4S then ran the place according to</p> <p>19 GSL's bid rather than its own?</p> <p>20 A. Well, it had to because the contract was written,</p> <p>21 signed, during the previous times. Okay, we all tried</p> <p>22 to develop the contract -- and when I say "we", I mean</p> <p>23 the customer as well as the contractor -- through</p> <p>24 various notices of change, and you try to evolve the</p> <p>25 contract, but inevitably there is a functionality of</p> <p style="text-align: center;">Page 23</p> |
| <p>1 that I could contact people in the Home Office and we</p> <p>2 would work together to resolve a particular social or</p> <p>3 caring issue.</p> <p>4 Q. Really, just zeroing in on what Mr Saunders was saying</p> <p>5 there, he was saying the Home Office corporately --</p> <p>6 rather than individuals; corporately -- really just</p> <p>7 cared about the removal process and its functionality,</p> <p>8 is what he was saying.</p> <p>9 A. I think there is a range of concerns, and, yes, they</p> <p>10 were corporately concerned about the removal process,</p> <p>11 and, yes, they were also corporately concerned about the</p> <p>12 care we gave to people.</p> <p>13 Q. Can I ask you what you meant a little earlier when</p> <p>14 talking about the contract, and you said, I think -- I'm</p> <p>15 watching the rolling transcript from time to time, so</p> <p>16 forgive me if I look away from you, Mr Petherick. But</p> <p>17 it caught my eye, and I checked what it was you said.</p> <p>18 You said, "The contract was a function of the age in</p> <p>19 which it was signed". What did you mean by that?</p> <p>20 A. I think contracts, be they for five years, ten years, or</p> <p>21 in some cases 25 years, are signed at a period during</p> <p>22 which, nationally, there may be a drive to reduce costs,</p> <p>23 or whatever, and I have seen, during my career, periods</p> <p>24 where we have known contracts would be awarded primarily</p> <p>25 on a cost basis, and so there was a drive to reduce</p> <p style="text-align: center;">Page 22</p> | <p>1 the time at which the contract is awarded. I've seen</p> <p>2 that in other iterations or phases of contracts in other</p> <p>3 custodial settings.</p> <p>4 Q. In this instance, did it mean, because of the way the</p> <p>5 contract was written, that, even though G4S had overbid,</p> <p>6 and therefore didn't win the contract, it was, in</p> <p>7 effect, compelled to set different targets in order to</p> <p>8 run the contract at the agreed rate?</p> <p>9 A. Not to set different targets. The contract was still in</p> <p>10 existence --</p> <p>11 Q. Forgive me. I mean its own targets. If G4S says, "We</p> <p>12 can do it at this level", but GSL comes in at a lower</p> <p>13 level, when G4S takes over GSL, it has to abandon what</p> <p>14 it felt was the profitable basis upon which it could run</p> <p>15 the contract, surely?</p> <p>16 A. And the fact is that GSL were delivering the contract</p> <p>17 and, you know, G4S may have overbid. They may have got</p> <p>18 the numbers wrong. And it was entirely -- well, my</p> <p>19 recollection is that the delivery of the contract under</p> <p>20 the GSL control was entirely appropriate, was to the</p> <p>21 contract. Certainly when I took over that contract from</p> <p>22 my predecessor, that's how it felt to me.</p> <p>23 Q. What diligence is done, as a matter of interest, when,</p> <p>24 as in this instance, GSL has won the contract. The</p> <p>25 original contract, I think, is February 2008 --</p> <p style="text-align: center;">Page 24</p> |

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| <p>1 A. It would be about then.</p> <p>2 Q. -- and it was a ten-year contract because the renewal</p> <p>3 came up ten years later in 2018. What due diligence</p> <p>4 goes on with the Home Office when G4S comes in, takes</p> <p>5 over GSL and the contract with it? What happens?</p> <p>6 A. I can't give you an answer to that because I wasn't</p> <p>7 working for G4S at that time. By definition, I was</p> <p>8 working for GSL. I simply cannot -- I would be</p> <p>9 guessing.</p> <p>10 Q. Do you know offhand when G4S bought GSL?</p> <p>11 A. Oh, crikey. I believe it was in 2008.</p> <p>12 Q. 2008?</p> <p>13 A. I'm not sure what --</p> <p>14 Q. So almost around the time that GSL must have won the</p> <p>15 contract, if February 2008 is the correct month and</p> <p>16 year?</p> <p>17 A. My recollection is, it was late summer/early autumn.</p> <p>18 Q. But you take the point I'm making?</p> <p>19 A. I do.</p> <p>20 Q. Obviously, I'm not asking you to reconstruct G4S's bid</p> <p>21 and whether it was right or whether it was wrong in its</p> <p>22 numbers. But the fact remains, it comes in, buys GSL,</p> <p>23 takes over the contract. You have no idea either,</p> <p>24 I suspect, Mr Petherick -- but tell us if you do -- does</p> <p>25 the Home Office look at G4S and look at the contract</p> <p style="text-align: center;">Page 25</p> | <p>1 over and above, and did invest over and above. So</p> <p>2 profit was not the sole driver.</p> <p>3 Q. But it wasn't a charity either?</p> <p>4 A. No, of course not. In the same way -- I have these</p> <p>5 conversations with many people. When I was a governor</p> <p>6 or an area manager in the public sector, I had budgets</p> <p>7 to deliver and that I was held to. In the same way --</p> <p>8 and G4S is a commercial company, of course it is, and it</p> <p>9 has shareholders and so forth -- or it had shareholders,</p> <p>10 and so forth, to be accountable for, and I'm not</p> <p>11 embarrassed by that, because I know that we, as</p> <p>12 managers, were told to make sure we cared for -- and</p> <p>13 I had a line manager who was absolutely solid in that.</p> <p>14 In my statement, I quote an example of another</p> <p>15 establishment where I was concerned about delivery, and</p> <p>16 I came to the decision that we had to limit the number</p> <p>17 of people who came into that establishment. I remember</p> <p>18 the phone conversation I had with my line manager,</p> <p>19 Peter Neden, that lasted all of about four minutes,</p> <p>20 I think, about me saying, "I believe we have to do this</p> <p>21 for the safety of staff and the people we are caring</p> <p>22 for", and there was no prevarication. And so, you know,</p> <p>23 it -- I get frustrated when people outside of this arena</p> <p>24 kind of say that the only driving motive for me when</p> <p>25 I was working, and for other companies, is the profit</p> <p style="text-align: center;">Page 27</p> |
| <p>1 again, when a buyer comes in, like G4S, and takes over</p> <p>2 GSL?</p> <p>3 A. My recollection of the time, and, like I say, I wasn't</p> <p>4 a major player in this, by definition, is that G4S would</p> <p>5 have had to have permission from the Home Office and,</p> <p>6 indeed, other government departments about that. That's</p> <p>7 a belief. I can't say definitively. But I should also</p> <p>8 make clear that GSL would have, and did, firmly believe</p> <p>9 in their numbers in that they could operate the site,</p> <p>10 and so forth.</p> <p>11 Q. What, presumably, you can't tell us is, once G4S took</p> <p>12 over the site and started operating it, whether they</p> <p>13 operated it in the way the contract intended or</p> <p>14 differently?</p> <p>15 A. No, they'd have to operate it in the way the contract</p> <p>16 was intended, together with any further notices of</p> <p>17 change and contractual amendments.</p> <p>18 Q. What I really am getting at is whether G4S did a little</p> <p>19 extra rather than applying the contract at the minimum.</p> <p>20 That's all I'm driving at.</p> <p>21 A. Let me make it clear that G4S always, in my experience,</p> <p>22 and certainly with my line managers, made it very clear</p> <p>23 that profit was not -- and I repeat "not" -- the driving</p> <p>24 factor. That we were expected, rightly expected, to</p> <p>25 deliver a good service and, on occasion, we would invest</p> <p style="text-align: center;">Page 26</p> | <p>1 motive. That is not the case.</p> <p>2 Q. As I said, we will come back to aspects of the contract</p> <p>3 later.</p> <p>4 A. Sure.</p> <p>5 Q. In the meantime, and you have already mentioned changes</p> <p>6 to the contract, ten years, by the sound of it,</p> <p>7 certainly 25, but I think I'm right in saying this was</p> <p>8 ten-year contract?</p> <p>9 A. It was.</p> <p>10 Q. That is a long time, probably, in Detention Services,</p> <p>11 because of what you said a little earlier: the politics</p> <p>12 changed, the drivers changed, from the point of view of</p> <p>13 the government about what's important. You tell us</p> <p>14 price was a big thing in terms of the year 2008</p> <p>15 contract. The changes which can be applied, are they</p> <p>16 substantial changes, or is it just tinkering around the</p> <p>17 edges?</p> <p>18 A. They can be both, to be quite honest. They can be new</p> <p>19 buildings coming into sites which can potentially</p> <p>20 increase the size of an establishment by 20 per cent,</p> <p>21 so -- or it can be somewhat down to the minutiae.</p> <p>22 Q. Where does change begin? Would it be G4S saying, "This</p> <p>23 is what we need to do" or the Home Office with a new</p> <p>24 initiative, political initiative, financial initiative,</p> <p>25 whatever, says to G4S, "This is a change that we need to</p> <p style="text-align: center;">Page 28</p> |

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| <p>1 talk about", and you come to some form of agreement, it</p> <p>2 is approved and off you go?</p> <p>3 A. All of the above, to be quite honest. Then you also</p> <p>4 have to look at some overriding factors such as in --</p> <p>5 oh, crikey, I think it was about 2012/2014, the</p> <p>6 Francis Maude report from the Cabinet Office with all</p> <p>7 government contracts looking to make them more</p> <p>8 efficient, and so forth. So the whole range can come</p> <p>9 into it.</p> <p>10 Q. Let's just look at some changes so we can get a flavour</p> <p>11 of this. You deal with them in your witness statement,</p> <p>12 Mr Petherick, the first of which we will find at</p> <p>13 paragraphs 36 to 40. This was 2011, and we can put up</p> <p>14 a document up on screen. Chair, it is <CJS004405>. If</p> <p>15 we take it from the top, this is a "Service provider</p> <p>16 change request (form A)".</p> <p>17 A. Yes.</p> <p>18 Q. You're the service provider. The date is</p> <p>19 19 December 2011 and the subject heading "Adaptation of</p> <p>20 CSU". Then, in box 4, there are reasons for change, and</p> <p>21 we can see "Other" is ticked, so it is not</p> <p>22 DC legislation -- detention centre legislation,</p> <p>23 Mr Petherick? --</p> <p>24 A. Mmm-hmm.</p> <p>25 Q. -- or other legislative change. Then, in box 5,</p> <p style="text-align: center;">Page 29</p> | <p>1 A. I'd have to go back to the inspectorate report to give</p> <p>2 an answer to that.</p> <p>3 Q. No need for that. But it looks like they weren't happy</p> <p>4 about something?</p> <p>5 A. There must have been some aspect.</p> <p>6 Q. So the change form continues:</p> <p>7 "... we propose to adapt part of the current CSU</p> <p>8 into a separate living unit for detainees who are being</p> <p>9 discharged from the centre or for those requiring</p> <p>10 constant supervision and/or welfare needs."</p> <p>11 The proposal here is that "the current RFA</p> <p>12 section" -- what does that mean?</p> <p>13 A. Removal from association.</p> <p>14 Q. "... section comprising of 13 single beds is converted</p> <p>15 into a 26 bed certainly unit (twin rooms). Internal</p> <p>16 facilities will be provided for regimes and daily</p> <p>17 living. We also propose to add a further 4 beds (2</p> <p>18 singles -- 4 twins) to the current TC unit ..."</p> <p>19 A. Temporary confinement, I think.</p> <p>20 Q. "... and utilise this area for both RFA and TC.</p> <p>21 "In order to maintain flexibility we would seek all</p> <p>22 rooms under this proposal to remain triple accredited.</p> <p>23 On approval of this SPCR [service provider change</p> <p>24 request] G4S will produce full operational procedures</p> <p>25 for approval by the Authority."</p> <p style="text-align: center;">Page 31</p> |
| <p>1 documents appended to the form, in this case, safer cell</p> <p>2 systems, Sherlock & Neal -- any idea what that refers</p> <p>3 to?</p> <p>4 A. Ooh, crikey. My recollection is they were</p> <p>5 mechanical/electrical engineers and so were probably</p> <p>6 involved in some changes to the room doors or electrical</p> <p>7 rooms.</p> <p>8 Q. And then "G4S FF&E"?</p> <p>9 A. Fixtures, fittings and equipment.</p> <p>10 Q. Here the details have changed:</p> <p>11 "In response to the recent HMCIP inspection</p> <p>12 (Rule 15 -- inappropriate use of separation) ..."</p> <p>13 Pausing there, under the rules, rule 15 is where the</p> <p>14 Secretary of State has to satisfy him or herself that,</p> <p>15 in every detention centre, sufficient accommodation is</p> <p>16 provided for all detained persons, and the</p> <p>17 Secretary of State has to certify --</p> <p>18 A. Correct.</p> <p>19 Q. -- the appropriateness, I suppose, of the accommodation?</p> <p>20 A. Yes, the physical appropriateness, the size and so</p> <p>21 forth.</p> <p>22 Q. In this instance, in response to what had been a recent</p> <p>23 inspection, clearly HMIP had said that rule 15 was not</p> <p>24 being complied with. Is that what we read from this,</p> <p>25 "inappropriate use of separation"?</p> <p style="text-align: center;">Page 30</p> | <p>1 The authority is the Home Office?</p> <p>2 A. Home Office.</p> <p>3 Q. "Due to the specialist nature of the materials involved</p> <p>4 we have only been able to obtain 2 quotes."</p> <p>5 And some facts and figures are set out below. We</p> <p>6 have got your signature at the foot of this</p> <p>7 particular --</p> <p>8 A. Except we don't have my signature there.</p> <p>9 Q. Forgive me, a space for your signature. Your name is</p> <p>10 printed below.</p> <p>11 A. Yes.</p> <p>12 Q. In your witness statement at paragraph 38 -- I'm really</p> <p>13 using this as no more than an example.</p> <p>14 A. Sure.</p> <p>15 Q. It is almost ancient history because it is 2011. But</p> <p>16 I'm using this as an example of such a form and the</p> <p>17 process, with your assistance. You say at your 38:</p> <p>18 "On reading the document, it appears to me that the</p> <p>19 proposal was to reduce the size of the current CSU ..."</p> <p>20 That's the Care and Separation Unit?</p> <p>21 A. Yes.</p> <p>22 Q. "... and to utilise the accommodation freed up by this</p> <p>23 as a pre-discharge unit or a unit to provide constant</p> <p>24 supervision and/or welfare needs. Some 11 years on,</p> <p>25 I can't recall specific discussions on this, but it</p> <p style="text-align: center;">Page 32</p> |

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| <p>1 would seem to me to be an appropriate proposal.</p> <p>2 Experience gained from other locations throughout my</p> <p>3 career leads me to believe there was a risk that</p> <p>4 occupation of CSUs might be driven by physical capacity</p> <p>5 rather than actual need."</p> <p>6 Pausing there, what did you mean by that?</p> <p>7 A. I think the best example I can give is, when I became</p> <p>8 area manager of the South-West Prison Service,</p> <p>9 I inherited HMP Dartmoor, and the major task I was given</p> <p>10 was to move Dartmoor forwards in terms of delivery, and</p> <p>11 so forth. Dartmoor, at that time, had a 43-bed</p> <p>12 Segregation Unit, in effect, and whenever I visited, it</p> <p>13 was full. Very often, in fairness, half of the capacity</p> <p>14 taken by prisoners being segregated for their own safety</p> <p>15 from other prisoners. But it was a 43-bed unit, and</p> <p>16 I took the decision to close it and to open a 10-bed</p> <p>17 unit, because, to -- simply to move the site on. And</p> <p>18 so, I always recall the risk of, the larger the unit,</p> <p>19 the more uses it will be put to and the reason for that</p> <p>20 existence, and so that always left a memory with me.</p> <p>21 Rightly or wrongly, it left a memory.</p> <p>22 Q. So your concern was, if you have a larger unit, people</p> <p>23 will be put in it?</p> <p>24 A. There's always a risk of that.</p> <p>25 Q. Does that mean, where care and separation is concerned,</p> <p style="text-align: center;">Page 33</p> | <p>1 A. Sure.</p> <p>2 Q. -- by you, as managing director. Was this on your</p> <p>3 initiative?</p> <p>4 A. No. Reading this, and, as you have said, it is 11 years</p> <p>5 ago now. Reading this, it follows --</p> <p>6 Q. Actually, you said that, Mr Petherick.</p> <p>7 A. Sorry?</p> <p>8 Q. Actually, you said that in your paragraph 38. It is</p> <p>9 11 years ago. I said it was ancient history. Either</p> <p>10 way, where do you think the initiative came from?</p> <p>11 A. Probably, reading this, from the HMIP inspection at that</p> <p>12 time.</p> <p>13 Q. So that was that, as an example, and that explains the</p> <p>14 configuration of E wing and the Care and Separation</p> <p>15 Unit, or "the block", as it is affectionately called?</p> <p>16 A. No, I don't call it that and --</p> <p>17 Q. Not by you, but we have heard it called --</p> <p>18 A. -- I object to that. It used to be called the</p> <p>19 Segregation Unit, and so we moved it within the G4S</p> <p>20 business and it was followed by other people after that</p> <p>21 towards a Care and Separation Unit because semantics are</p> <p>22 important.</p> <p>23 Q. Well, they may be to you, but --</p> <p>24 A. They are.</p> <p>25 Q. -- certainly we have heard it referred to as "the</p> <p style="text-align: center;">Page 35</p> |
| <p>1 that that would necessarily involve the incorrect use of</p> <p>2 rule 40 and rule 42, perhaps, or was that not --</p> <p>3 A. There's got to be a risk of that, and I'd much rather</p> <p>4 prevent -- or to minimise the risk. I'm not saying it</p> <p>5 would happen, but I am saying, through my experience,</p> <p>6 that there was a risk.</p> <p>7 Q. In the end, did this go ahead?</p> <p>8 A. It did. So part of -- as I recall, it was Echo wing,</p> <p>9 E wing. The far end of it was segregated off as a CSU.</p> <p>10 Two-thirds, probably, of that landing were used for</p> <p>11 other purposes.</p> <p>12 Q. If I have got it right, and if my memory is good,</p> <p>13 I think you have E wing and then there was -- it was</p> <p>14 blocked off at the end and then you had a gate --</p> <p>15 A. Correct.</p> <p>16 Q. -- through which you would go, the other side of which</p> <p>17 were, I think, 12 or 13 rooms, something like that?</p> <p>18 A. I can't remember the number. I'd be guessing, I'm</p> <p>19 afraid.</p> <p>20 Q. But it is something of that order, I think?</p> <p>21 A. Of that order.</p> <p>22 Q. So that was, in effect, your doing?</p> <p>23 A. No, not necessarily.</p> <p>24 Q. Forgive me. I mean, this document was clearly signed</p> <p>25 off at some point --</p> <p style="text-align: center;">Page 34</p> | <p>1 block". But, there again, that shows, Mr Petherick,</p> <p>2 with the best will in the world, as managing director,</p> <p>3 you can't control what comes out of the mouths, perhaps,</p> <p>4 of detainee custody officers?</p> <p>5 A. Sadly, no, but I can do my best to influence it.</p> <p>6 Q. We may come back to that a little later.</p> <p>7 A. Sure.</p> <p>8 Q. Did you know that the CSU was referred to as "the</p> <p>9 block"?</p> <p>10 A. I would be totally naive if I thought in any of</p> <p>11 the sites across the country -- public or private --</p> <p>12 that people didn't refer to CSUs or Segregation Units as</p> <p>13 "the block". That would be pure naivety on my part.</p> <p>14 What I can do is my utmost to convince people to talk</p> <p>15 about it, to use the language, and to do my best to</p> <p>16 model that. But I'm not going to be naive and say, you</p> <p>17 know, nowhere.</p> <p>18 Q. No, no.</p> <p>19 A. Sadly, that's one of the realities of the environment,</p> <p>20 and that's both for public sector and private sector.</p> <p>21 Q. Yes, sure. I mean, in this instance, can you remember?</p> <p>22 It may be something that never came to your ears, but if</p> <p>23 it did --</p> <p>24 A. If it did come to my ears, I would challenge it.</p> <p>25 Q. How?</p> <p style="text-align: center;">Page 36</p> |

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| <p>1 A. Directly.</p> <p>2 Q. What, with the individuals?</p> <p>3 A. Yes.</p> <p>4 Q. Or with the centre director, or what?</p> <p>5 A. Both.</p> <p>6 Q. Let's take another example. If it came to your ears</p> <p>7 that a custody officer was referring to a detained</p> <p>8 person to his face or close enough for him to hear it as</p> <p>9 "dickhead" or telling him to "fuck off" or a "cunt" or</p> <p>10 any words like that. If that had come to your ears,</p> <p>11 what would you have done about it?</p> <p>12 A. I would have addressed it immediately. I would have</p> <p>13 followed it up and, in all probability, by disciplinary</p> <p>14 action, because that is totally unacceptable to every</p> <p>15 bit of my being and other people's beings, and if</p> <p>16 I walked by it and didn't address it, then I would be</p> <p>17 condoning it. And so I can remember many occasions</p> <p>18 during my career when I have had very direct</p> <p>19 conversations with staff who have used inappropriate</p> <p>20 language or who have failed to address it.</p> <p>21 Sadly, I can only directly deal with what I hear,</p> <p>22 and you will know, and I will know, that most people</p> <p>23 will be aware if I was walking around and so forth, be</p> <p>24 it as a governor, an area manager, an MD. I would</p> <p>25 certainly address those issues directly and forcefully.</p> <p style="text-align: center;">Page 37</p> | <p>1 not review -- conduct these reviews in his or her own</p> <p>2 business stream. So, for example, I conducted one at</p> <p>3 Hinkley Point, a nuclear power station, where G4S had</p> <p>4 a contract.</p> <p>5 Q. This, I think, Mr Saunders had prepared in 2014 for what</p> <p>6 was a bidding process?</p> <p>7 A. No, no, no. It was a system of reviews that the company</p> <p>8 put in to look at the health -- financial, commercial,</p> <p>9 operational -- of the contracts. As I say, these</p> <p>10 reviews were held in a number of my sites. I was not</p> <p>11 the MD on the review because that would be</p> <p>12 inappropriate. I would conduct similar reviews in other</p> <p>13 G4S businesses.</p> <p>14 Q. Let's then go, I think, Zaynab, to page 44. We see the</p> <p>15 heading on this slide is "Financials -- Detailed</p> <p>16 Financials", and the owner of the page was</p> <p>17 Kalpesh Mistry, who was the accountant, we understand?</p> <p>18 A. He was the -- I forget the exact title. But he was the</p> <p>19 accountant responsible for a few contracts, one of which</p> <p>20 was Gatwick, and he reported up through the financial</p> <p>21 arm.</p> <p>22 Q. We see the third entry down "Actual contract margin</p> <p>23 18 per cent":</p> <p>24 "... (to achieve change from Contract Margin we have</p> <p>25 restructured our staffing, introduced clustering and</p> <p style="text-align: center;">Page 39</p> |
| <p>1 Q. That's if you hear it?</p> <p>2 A. And that's the issue, and I accept that, but all I can</p> <p>3 do is to model behaviours, to express my belief</p> <p>4 structure, and so forth.</p> <p>5 Q. We will come back to it later. The indirect method is,</p> <p>6 when it comes to your ears and you have to deal with</p> <p>7 a disciplinary issue?</p> <p>8 A. Yes.</p> <p>9 Q. Or a grievance, perhaps?</p> <p>10 A. Yes.</p> <p>11 Q. So that was 2011. Moving on in time, and you deal with</p> <p>12 this at paragraphs 41 to 46 of your witness statement,</p> <p>13 there was then, in March 2013, a proposal to add</p> <p>14 a further 22 beds. You will remember that. Can we put</p> <p>15 up on screen, Zaynab, please, <CJS000768> at page 44 to</p> <p>16 begin with.</p> <p>17 Can we go straight to the first slide, and we will</p> <p>18 come back to this. Do you remember this contract</p> <p>19 review?</p> <p>20 A. I do. It was a system of reviews that the company put</p> <p>21 in. It wasn't directed through me, for want of a better</p> <p>22 phrase, but these were conducted centrally, and this was</p> <p>23 one of a series of contract reviews that took place.</p> <p>24 Very often -- no, that's wrong. Normally, a managing</p> <p>25 director would be responsible for the review and would</p> <p style="text-align: center;">Page 38</p> | <p>1 efficiency savings, such as key vend, introduced over</p> <p>2 100 Notices of Change since bidding the contract and</p> <p>3 added a further 22 beds to change from 426 to 448 beds</p> <p>4 at this current time)."</p> <p>5 This, you say, was in March 2013; yes?</p> <p>6 A. I ...</p> <p>7 Q. Look at paragraph 41.</p> <p>8 A. Sorry, thank you. Yes. Those were the 22 bed spaces.</p> <p>9 Q. You say:</p> <p>10 "My recollection, some nine years after the event,</p> <p>11 is that this followed discussions between Home Office</p> <p>12 representatives and G4S representatives. As I recall,</p> <p>13 the aim was to make more effective use of</p> <p>14 the accommodation. For example, to provide additional</p> <p>15 scope for monitoring detainees at risk of self-harm."</p> <p>16 Do you remember where those beds went?</p> <p>17 A. No, I don't.</p> <p>18 Q. Clearly, on the residential wings, but distributed among</p> <p>19 the residential wings or what?</p> <p>20 A. I can't recall.</p> <p>21 Q. You were asked -- this is your paragraph 42 -- whether,</p> <p>22 before the introduction of 22 additional beds, there</p> <p>23 were already pressures and demands on the staff from the</p> <p>24 existing population and inadequate staff, and you, in</p> <p>25 three words, disagreed: "I do not"?</p> <p style="text-align: center;">Page 40</p> |

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| <p>1 A. Yes.</p> <p>2 Q. Presumably, that's still your position?</p> <p>3 A. It is.</p> <p>4 Q. There is an inevitability, I'm sure you will agree,</p> <p>5 Mr Petherick, that if you increase the beds, at full</p> <p>6 capacity it means you have got 22 more men to cater for?</p> <p>7 A. Mmm.</p> <p>8 Q. Which means that the staffing levels have to increase,</p> <p>9 doesn't it?</p> <p>10 A. Not necessarily, because, inevitably, there is some</p> <p>11 latitude in staffing planning, and so forth, and so</p> <p>12 staffing is -- there is a science to it. There is also</p> <p>13 an art to it. And so it isn't an automatic increase,</p> <p>14 and some of the issues, as you have just said, or</p> <p>15 suggested, that if those 22 beds are spread across the</p> <p>16 wings, then, actually, the direct impact on one or other</p> <p>17 of the wings or the landings is significantly less than</p> <p>18 22 beds being put onto one wing.</p> <p>19 Q. But if you are running to the contract minimum</p> <p>20 requirements, for example, of two DCOs on each</p> <p>21 residential wing, and let's assume that the 22 are</p> <p>22 spread evenly, thereabouts, across the residential</p> <p>23 wings, if you are dealing with, perhaps, three to five</p> <p>24 more men on each wing, would G4S not look at the</p> <p>25 staffing, the minimum requirement, under the contract,</p> <p style="text-align: right;">Page 41</p> | <p>1 the establishment's delivery and to have a conversation</p> <p>2 about elements that are impacting on it. I would have</p> <p>3 expected, through the process of the notice of change,</p> <p>4 and so forth, for discussions to have taken place there.</p> <p>5 If we needed to commission a health and safety risk</p> <p>6 assessment, and so forth, we would make sure that was</p> <p>7 done. And so, as I say, it's an opportunity to review</p> <p>8 the proposal. And also -- and let's be clear about</p> <p>9 this, the notices of change would also be discussed at</p> <p>10 local -- if the size of the change was sufficient, at</p> <p>11 a higher level with Home Office officials.</p> <p>12 Q. If you, after all of that, came to a conclusion that the</p> <p>13 addition of 22 beds was unsafe or it couldn't be</p> <p>14 properly managed, for whatever reason, would you tell</p> <p>15 the Home Office?</p> <p>16 A. Yes. As I recall, it's a different notice of change,</p> <p>17 but the one that introduced a further number of beds --</p> <p>18 Q. We will come to that.</p> <p>19 A. The position is the same, because we felt, at that</p> <p>20 stage, that there was a cap on which we could safely</p> <p>21 deliver, and so we -- as I recall, we were invited to</p> <p>22 increase the capacity by up to 180, and we said no, and</p> <p>23 so we limited that. So, yes, we would push back, and we</p> <p>24 did push back, and we did have discussions.</p> <p>25 Q. In your paragraph 43, coming back to your witness</p> <p style="text-align: right;">Page 43</p> |
| <p>1 because the contract doesn't seem to cater for an</p> <p>2 increase. When you make a change like this, does</p> <p>3 staffing naturally go up under the contract?</p> <p>4 A. Not necessarily.</p> <p>5 Q. But what does G4S do in these circumstances? Does it</p> <p>6 say, "We will take a punt and see how it goes" or does</p> <p>7 it do a proper risk assessment to see if staffing needs</p> <p>8 to be increased?</p> <p>9 A. I have to say it is completely wrong and unfair to</p> <p>10 suggest that we ever simply "take a punt". There is</p> <p>11 a risk process. I would expect that to have been</p> <p>12 carried through. There quite probably would have been</p> <p>13 discussions at trading reviews, and so forth. You know,</p> <p>14 it's -- to suggest that we just "take a punt" is</p> <p>15 completely wrong.</p> <p>16 Q. What is a trading review, Mr Petherick?</p> <p>17 A. A trading review was a monthly meeting, so</p> <p>18 a company-wide structure, whereby I would meet the</p> <p>19 directors and some of their team every month to review</p> <p>20 the establishment's delivery on a number of</p> <p>21 parameters -- health and safety, operational, human</p> <p>22 resources, commercial, and so forth -- and that --</p> <p>23 I would use those reviews to prepare myself for my</p> <p>24 trading review with my line manager, which would follow</p> <p>25 a similar process, and it was an opportunity to review</p> <p style="text-align: right;">Page 42</p> | <p>1 statement, you say:</p> <p>2 "There will always be differing opinions on staffing</p> <p>3 ratios but in my professional view and experience, the</p> <p>4 agreed ratios were appropriate."</p> <p>5 You say:</p> <p>6 "In that experience, I know unions would raise</p> <p>7 concerns if they thought agreed ratios were inadequate.</p> <p>8 I have no recall of any such approach from the relevant</p> <p>9 union and that contributes to my view of the adequacy."</p> <p>10 What did you mean by "agreed ratios"?</p> <p>11 A. Well, as you were suggesting earlier, you have a certain</p> <p>12 number of staff for a certain group/number of detainees,</p> <p>13 or prisoners, if it were to be a prison. There is no --</p> <p>14 in either sector, no overarching agreement, as such,</p> <p>15 because it depends on the structure of</p> <p>16 the establishment, the sight lines, ie, how visible all</p> <p>17 areas of the units were, et cetera. All of these things</p> <p>18 factor into what is an acceptable ratio of staff to</p> <p>19 detainees, or, in the case of a prison, prisoners.</p> <p>20 Q. But the reason I'm asking, Mr Petherick, is, these are</p> <p>21 your words, "The agreed ratios were appropriate".</p> <p>22 I just want to know what the agreed ratios were?</p> <p>23 A. I don't have that figure in my mind, but it would have</p> <p>24 been as per the contract.</p> <p>25 Q. In your view, while we have that in mind, was</p> <p style="text-align: right;">Page 44</p> |

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| <p>1 Brook House adequately staffed always?</p> <p>2 A. Oh, there were times when we were under significant</p> <p>3 pressure, and we would -- no great surprise there. The</p> <p>4 whole custodial and detention industry came under real</p> <p>5 pressure for staffing at some times during this period,</p> <p>6 and we had the particular pressure of Gatwick Airport</p> <p>7 and the employment opportunities there.</p> <p>8 So there were times when we were struggling, yes,</p> <p>9 and we looked to address that in a number of ways,</p> <p>10 through overtime; as I recall, we deployed -- we sought</p> <p>11 to deploy staff from other sites. I think, but I can't</p> <p>12 say definitively, that we dual-qualified a number of</p> <p>13 staff, ie, staff who were qualified to work in prisons</p> <p>14 and detention centres. I think we did, but I can't say</p> <p>15 definitively. But there were a number of ways in which</p> <p>16 we would seek to address the staffing; primarily, in</p> <p>17 fairness, by overtime. Those pressures are not unusual.</p> <p>18 At one stage, when I was working in a maximum security</p> <p>19 establishment, I was responsible for a year for the</p> <p>20 staff deployment, and I know the pressures that are</p> <p>21 involved in making sure that you have the required staff</p> <p>22 numbers.</p> <p>23 Q. As I say, while we have this in mind, can we just look</p> <p>24 at something that Mr Saunders told Verita in his</p> <p>25 interview, <VER000226>, please. we see his interview was</p> <p style="text-align: center;">Page 45</p> | <p>1 failures. Through the course of me being there, we</p> <p>2 developed a much more robust contract assurance model,</p> <p>3 where previously, I have to be honest, the Home Office</p> <p>4 were sloppy, frankly. They didn't scrutinise the</p> <p>5 contract at all, and, certainly, that's the impression</p> <p>6 I got from the previous director as well. There was</p> <p>7 a Cabinet Office audit done a few years ago following</p> <p>8 the electronic monitoring of all large contracts and the</p> <p>9 Home Office were slammed by the audit report because of</p> <p>10 their lack of contract monitoring, partly."</p> <p>11 If we go back to the previous page, at the bottom,</p> <p>12 I have read in everything of what he said at that point:</p> <p>13 "Staffing vacancies generated some profits because</p> <p>14 you were saving on costs that you had already looked</p> <p>15 at."</p> <p>16 It almost sounds as if, where there were vacancies,</p> <p>17 in other words, where Brook House was understaffed, G4S</p> <p>18 benefited?</p> <p>19 A. No, because -- two things I would say. Firstly, we</p> <p>20 would be covering costs through overtime, and there were</p> <p>21 additional costs. And where there were gaps, it's</p> <p>22 actually quite a short-sighted approach, and I have</p> <p>23 known this in other sectors as well, because --</p> <p>24 Q. Short-sighted by whom?</p> <p>25 A. By whomever was trying to manage the contract in that</p> <p style="text-align: center;">Page 47</p> |
| <p>1 on 13 June 2018. Page 9, I think it would be. If we go</p> <p>2 to the bottom, at line 109, Mr Marsden asks him:</p> <p>3 "Question: Just give me a flavour for what would</p> <p>4 deliver in a good trading review for your accounts and</p> <p>5 what would have delivered an uncomfortable trading</p> <p>6 review?</p> <p>7 "Answer: I will say that I know I have talked about</p> <p>8 money quite a lot, but we were in a good financial</p> <p>9 situation. I am sure you know how the contract was</p> <p>10 operated financially in terms of the fixed fee, so there</p> <p>11 were no variable earners to that. We made our savings</p> <p>12 from looking at how we could save on budgets that we had</p> <p>13 set against the year, about any kind of savings</p> <p>14 opportunities we could do, being more economical with</p> <p>15 cleaning products or --</p> <p>16 "Question: It is squeezing and using some logic?</p> <p>17 "Answer: Yes, exactly, and it is quite small</p> <p>18 figures. Staffing vacancies generated some profits</p> <p>19 because you were saving on costs that you had already</p> <p>20 looked at. Therefore, we were typically in a good</p> <p>21 position financially because we didn't incur massive,</p> <p>22 great penalties, generally. The big penalties were</p> <p>23 coming from things like escapes in terms of large</p> <p>24 figures, but from a penalty point of view, we were very</p> <p>25 transparent about how we reported any performance</p> <p style="text-align: center;">Page 46</p> | <p>1 way. Short-sighted because, to employ someone costs at</p> <p>2 least, I would think, £8,000 to £10,000 for recruitment</p> <p>3 costs at the moment. So, actually, the imperative was</p> <p>4 to get people in, get them trained, deliver the contract</p> <p>5 and to deliver it properly. There is always going to be</p> <p>6 a "kind of/sort of" approach in staffing levels, and</p> <p>7 that is so whatever the contract, wherever it is</p> <p>8 operated. Because you have a recruitment exercise, and</p> <p>9 numbers improve. Through time, because people leave, or</p> <p>10 whatever, that diminishes and you have to have a further</p> <p>11 recruitment exercise.</p> <p>12 Q. But looking at this, Mr Saunders is clearly saying it is</p> <p>13 a saving having staffing vacancies?</p> <p>14 A. For a period of time.</p> <p>15 Q. As you mention it, Mr Petherick, when there is</p> <p>16 a recruitment exercise, I think you said now it can</p> <p>17 cost, what is it, £8,000 to £10,000?</p> <p>18 A. I'm guessing, because, at that time, we kind of budgeted</p> <p>19 on about £7,000.</p> <p>20 Q. But is that £7,000 just for a recruitment exercise</p> <p>21 for --</p> <p>22 A. No, that's per person.</p> <p>23 Q. So, so that we understand it, when G4S advertised for --</p> <p>24 not advertised. What, you put it through your</p> <p>25 recruitment agency, did you?</p> <p style="text-align: center;">Page 48</p> |

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| <p>1 A. No, generally it would be advertised on various</p> <p>2 websites, local media, and so forth. We used radio at</p> <p>3 one stage.</p> <p>4 Q. You got, what, an agency to help you with that or did</p> <p>5 you do it in-house?</p> <p>6 A. Our HR department did it.</p> <p>7 Q. But it still cost £7,000 per person, did you tell us?</p> <p>8 A. Yes, but that includes both the recruitment costs, the</p> <p>9 advertising, et cetera --</p> <p>10 Q. Of course.</p> <p>11 A. -- the training, and so forth.</p> <p>12 Q. So covering all of those costs for a single person at</p> <p>13 what level?</p> <p>14 A. That was for a DCO.</p> <p>15 Q. What, a brand-new DCO to come in?</p> <p>16 A. Yes.</p> <p>17 Q. Then you would have to train them up for six weeks?</p> <p>18 A. That is included in the cost, yes.</p> <p>19 Q. I see. So before, actually, they can provide value, to</p> <p>20 put it in those terms, you are talking about £7,000 per</p> <p>21 person?</p> <p>22 A. That's my expectation.</p> <p>23 Q. Was that a disincentive to keep staffing numbers up?</p> <p>24 A. No, not at all. Not at all. Because the frustration</p> <p>25 was when we were losing people to the airport, and so</p> <p style="text-align: center;">Page 49</p> | <p>1 were introduced to increase profit. You denied that?</p> <p>2 A. That was not the driving cause.</p> <p>3 Q. But it may have been a spinoff?</p> <p>4 A. Oh, yes, but it was not the pivotal cause.</p> <p>5 Q. You say at 46:</p> <p>6 "I am asked whether profit-increasing measures were</p> <p>7 a priority over the safety and well-being of</p> <p>8 the detainees and staff. This was never the case."</p> <p>9 You say:</p> <p>10 "The safety and well-being of detained persons and</p> <p>11 staff were always the prime considerations."</p> <p>12 They were certainly, you tell us, your prime</p> <p>13 considerations, and that was, what, the corporate</p> <p>14 message?</p> <p>15 A. I was under absolutely no misunderstanding. My line</p> <p>16 manager -- managers, actually, but let's just</p> <p>17 concentrate on my last line manager -- made it very</p> <p>18 clear to me, and I quoted earlier on the example --</p> <p>19 Q. You did.</p> <p>20 A. -- of --</p> <p>21 Q. Peter Neden?</p> <p>22 A. Yes. Peter was driven by the care we delivered. Yes,</p> <p>23 inevitably, we delivered to the contract. Yes, I had</p> <p>24 targets -- of course I did. But, like I say, I had</p> <p>25 similar targets in the public sector. But another</p> <p style="text-align: center;">Page 51</p> |
| <p>1 forth, because those costs would then have to be</p> <p>2 repeated. But, no, it wasn't a disincentive. It was an</p> <p>3 important element of our delivery.</p> <p>4 Q. And also subject to the other issue, you tell us that it</p> <p>5 wouldn't save costs because there would be overtime for</p> <p>6 those who were working there?</p> <p>7 A. Mmm-hmm.</p> <p>8 Q. Except we know that they were on 13-and-a-half-hour</p> <p>9 shifts, and we have heard plenty of complaints through</p> <p>10 the evidence of officers who found that quite hard</p> <p>11 going, so are you saying there were officers who were</p> <p>12 prepared to do more than 13 and a half hours?</p> <p>13 A. Generally, they were doing four long shifts a week. So</p> <p>14 there would be other days that people do overtime. And</p> <p>15 you're right about the length of the shifts. I have yet</p> <p>16 to find the ideal shift pattern for any person working</p> <p>17 in this industry. As I recall, we had, for a period of</p> <p>18 time, a system of shorter shifts, but they were</p> <p>19 unpopular because of the transport costs, and so forth,</p> <p>20 and so we were asked to move to a longer shift. We then</p> <p>21 decided to curtail that, and when I left, as I recall,</p> <p>22 they were on a 40-hour week.</p> <p>23 Q. Mr Petherick, coming back to the 22 beds -- we have</p> <p>24 diverted a little -- you denied in your paragraph 45</p> <p>25 whether the introduction of the additional 22 bed spaces</p> <p style="text-align: center;">Page 50</p> | <p>1 example of where my line manager had real interest, real</p> <p>2 concern, was when he put in a system, a meeting, for</p> <p>3 taking learning from self-harm incidents and the</p> <p>4 prevention of self-harm incidents, and he initiated that</p> <p>5 learning forum.</p> <p>6 Q. Do you think the values that you are talking about,</p> <p>7 Mr Petherick, that were made clear to you by Mr Neden,</p> <p>8 and which you are telling us about now, they filtered</p> <p>9 down?</p> <p>10 A. I would hope so, certainly to directors, deputy</p> <p>11 directors, and so forth. Again, I would say -- I would</p> <p>12 be naive if I expected every person working in that</p> <p>13 contract to have the same beliefs, the same standards.</p> <p>14 I'd like to think that, but I think it would be naive of</p> <p>15 me to say so.</p> <p>16 Q. We will have a break, with the chair's permission, in</p> <p>17 a few minutes, but I'd just like to ask you a couple of</p> <p>18 other things.</p> <p>19 First of all, can we put back up on screen, please,</p> <p>20 Mr Petherick's Verita interview, <VER000263> at page 11.</p> <p>21 At line 173, you were asked about the challenge, that it</p> <p>22 was going to be quite a challenge putting people in that</p> <p>23 physical environment, and you say:</p> <p>24 "Answer: I think our understanding at the time, or</p> <p>25 our belief at the time we were bidding, is it was going</p> <p style="text-align: center;">Page 52</p> |

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| <p>1 to be a challenge because of the structure. We knew</p> <p>2 that we would get the more difficult end of</p> <p>3 the detainees."</p> <p>4 The questioner says:</p> <p>5 "Question: I just want to press you on this</p> <p>6 business of how long people are there.</p> <p>7 "Answer: Yes, go on.</p> <p>8 "Question: You are going to have a very difficult</p> <p>9 population going into this quite austere, cramped</p> <p>10 environment?</p> <p>11 "Answer: Yes.</p> <p>12 "Question: Unlike many other places, you don't have</p> <p>13 the space to give people who are not subject to a regime</p> <p>14 the opportunities to have activities, get outside,</p> <p>15 generally lead a slightly more decent sort of life?</p> <p>16 "Answer: Yes.</p> <p>17 "Question: It is that decency question, really,</p> <p>18 isn't it? Did you even from the outset think this might</p> <p>19 be perhaps not as good a place as it ought to be?</p> <p>20 "Answer: I don't think we did, and I'm not going to</p> <p>21 pretend otherwise.</p> <p>22 "Question: You didn't think it was a decent place?</p> <p>23 "Answer: No, I --</p> <p>24 "Question: Sorry, that is really putting words into</p> <p>25 your mouth. You are telling me --</p> <p style="text-align: center;">Page 53</p> | <p>1 Q. We will come back to that?</p> <p>2 A. Well, I think it is important in the context.</p> <p>3 Q. Go on, then.</p> <p>4 A. Because Brook House was built to category B standards.</p> <p>5 Q. Yes.</p> <p>6 A. But not as a category B prison, because a cat B prison</p> <p>7 would have far wider ranges of sporting activities,</p> <p>8 educational activities, et cetera. This was designed at</p> <p>9 a period following significant disturbances at</p> <p>10 particularly Harmondsworth and Colnbrook Removal</p> <p>11 Centres, where I know, from talking to people who</p> <p>12 responded to those disturbances, the physical structure</p> <p>13 of those removal centres meant that they were</p> <p>14 significantly more unsafe, fragile, put whatever word</p> <p>15 you like.</p> <p>16 So the Home Office, understandably, wanted to</p> <p>17 increase the security of the fabric, and this was</p> <p>18 designed as a short-term holding centre. As it</p> <p>19 developed, detainees were held there for longer, and</p> <p>20 that's really when the frailties of the design became</p> <p>21 apparent, with the lack of outdoor space, with sporting</p> <p>22 space, with sports halls, education. We did what we</p> <p>23 could to alleviate some of those issues. But the fact</p> <p>24 remained that the site was incredibly cramped, and so,</p> <p>25 as the length of detention increased, and as other</p> <p style="text-align: center;">Page 55</p> |
| <p>1 "Answer: The judge would have intervened at that</p> <p>2 stage.</p> <p>3 "Question: You are telling me, I think, that you</p> <p>4 all knew that this was a very limited physical</p> <p>5 environment, for what you were going to have to do in</p> <p>6 it?</p> <p>7 "Answer: Yes, I would agree, plus we knew that we</p> <p>8 would have the challenging detainees."</p> <p>9 Now, I think you're talking about Brook House here?</p> <p>10 A. I am.</p> <p>11 Q. Was that your view, Mr Petherick?</p> <p>12 A. Can I just make the point, at line 184, I was curtailed</p> <p>13 in my response. I would have gone on from there, so it</p> <p>14 would be unfair simply to say "no".</p> <p>15 Q. Well, you tell us what you were going to say?</p> <p>16 A. I can't recall at this stage, but I just want to make</p> <p>17 the point that it was a curtailed response.</p> <p>18 Q. No, well, we can see that, and inevitably you and</p> <p>19 I overtalk every now and then, so that happens in any</p> <p>20 discourse.</p> <p>21 A. Sorry, forgive me, the question again was?</p> <p>22 Q. Well, the question is whether that was your view about</p> <p>23 Brook House?</p> <p>24 A. I think -- I've seen some people talk about Brook House</p> <p>25 being a category B prison.</p> <p style="text-align: center;">Page 54</p> | <p>1 factors came into play -- I've got no doubt we will talk</p> <p>2 at some stage about foreign national offenders, and so</p> <p>3 forth -- and that, again, increased the challenges. The</p> <p>4 fact that Brook House was adjacent to Gatwick meant that</p> <p>5 it was used for accumulations of detainees for charter</p> <p>6 flights, and so forth, and all of those factors</p> <p>7 interplayed on it.</p> <p>8 Q. So something that was designed, for the reasons you</p> <p>9 state, around the prison idea, because of the security</p> <p>10 issues, but without all of the benefits that went along</p> <p>11 with what would have been a category B prison, was all</p> <p>12 fine and well if it was used as a short-term holding</p> <p>13 facility, 72 hours, but once that went out the window</p> <p>14 and people were held there for far longer and the</p> <p>15 accumulations you mention for the reasons you give, it</p> <p>16 had become a problem place, hadn't it?</p> <p>17 A. It had become more challenging.</p> <p>18 Q. Here you were talking about it being quite a challenge</p> <p>19 from the start?</p> <p>20 A. Yes.</p> <p>21 Q. And it became even more challenging. How many of those</p> <p>22 concerns were actually raised with the Home Office?</p> <p>23 A. Oh, gosh, we would frequently have conversations/debates</p> <p>24 about it.</p> <p>25 Q. What happened?</p> <p style="text-align: center;">Page 56</p> |

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| <p>1 A. We carried on providing a service as per the contract.</p> <p>2 Q. As we will see after the break, 60 more beds went in.</p> <p>3 A. Indeed, which is 120 less than we were initially asked</p> <p>4 to provide.</p> <p>5 Q. Yes. That may well be, Mr Petherick, but the point is,</p> <p>6 rather than alleviate the problem, the problem</p> <p>7 increased, didn't it?</p> <p>8 A. Yes, as did the staffing levels, and so forth.</p> <p>9 MR ALTMAN: We will come back to that too, I'm sure.</p> <p>10 Chair, quarter of an hour, please?</p> <p>11 THE CHAIR: Thank you, Mr Petherick.</p> <p>12 (11.27 am)</p> <p>13 (A short break)</p> <p>14 (11.47 am)</p> <p>15 MR ALTMAN: Mr Petherick, can we go, please, to a statement</p> <p>16 made by Nathan Ward. Zaynab, it is <DL0000141> at</p> <p>17 page 32. Scroll to the bottom, please. Paragraph 95</p> <p>18 under the heading "Expansion of capacity" he tells the</p> <p>19 inquiry:</p> <p>20 "One of the main efficiency savings and</p> <p>21 profit-increasing measures that was agreed during my</p> <p>22 employment was the expansion of the capacity of</p> <p>23 Brook House. First, this was the introduction of an</p> <p>24 additional 22 bed spaces whilst I was still there</p> <p>25 in March 2013, taking the detention capacity up to 448</p> <p style="text-align: center;">Page 57</p> | <p>1 A. I do.</p> <p>2 Q. At the bottom, it's RAG rated. What does green mean?</p> <p>3 A. Green would be a positive. It is delivering as it</p> <p>4 should do, et cetera. I'm not sure of the exact</p> <p>5 definition off the top of my head.</p> <p>6 Q. But, RAG: red, amber, green?</p> <p>7 A. Yes.</p> <p>8 Q. Here we have green. March 2013, you will see the</p> <p>9 central entry:</p> <p>10 "Additional 22 beds (ongoing -- revenue £482k pa,</p> <p>11 margin [in other words, profit] £28k pa)."</p> <p>12 One would have thought Ben Saunders, the centre</p> <p>13 director, if not, Nathan Ward, would have been aware of</p> <p>14 overheads and everything else when citing profit; no?</p> <p>15 A. No, not to that level. The company overheads were</p> <p>16 separate to the establishment's awareness.</p> <p>17 Q. So what was the point of him putting in these figures?</p> <p>18 A. Because those were the gross local, but you then have to</p> <p>19 take into account the company overheads.</p> <p>20 Q. The company overheads?</p> <p>21 A. Company overheads, both centrally and my team,</p> <p>22 insurance, and so forth.</p> <p>23 Q. We don't find the word "gross", do we?</p> <p>24 A. No, we don't. And that's a shame, because that's</p> <p>25 actually what it's referring to.</p> <p style="text-align: center;">Page 59</p> |
| <p>1 spaces."</p> <p>2 Then he refers to the G4S 360 contract review, which</p> <p>3 we looked at a little earlier, Mr Petherick, which:</p> <p>4 "... confirms at page 24 that this led to an</p> <p>5 increase in revenue of £482,000 per annum and £28,000</p> <p>6 profit per annum."</p> <p>7 We can look at the review if you want, but I'm sure</p> <p>8 you're prepared to take the figures from this. Do you</p> <p>9 agree that it was a profit-increasing measure that was</p> <p>10 agreed during his employment, the way he puts it?</p> <p>11 A. Not in exactly the context he puts it, no. Profits did</p> <p>12 increase, but remembering that makes no allowance for</p> <p>13 increased overheads, such as increased insurance premium</p> <p>14 and other overheads that he -- neither he nor the</p> <p>15 contract would have been aware of, and so that isn't</p> <p>16 a pure 28K increase. You also have to then look at the</p> <p>17 overheads. I don't know what the overheads were, but it</p> <p>18 is entirely likely that the insurance premium increased</p> <p>19 because of the increased capacity.</p> <p>20 Q. Let's just go back to what he refers to so that we can</p> <p>21 see the source of it. It is the 360-degree contract</p> <p>22 review we looked at earlier. It is <CJS000768>. It is</p> <p>23 page 27, although I think it is slide 24, but it is</p> <p>24 page 27. Do you see under the heading for this slide</p> <p>25 "Service delivery -- performance"?</p> <p style="text-align: center;">Page 58</p> | <p>1 Q. But, nonetheless, you're not going to say, Mr Petherick,</p> <p>2 whether it was £28,000 or £2.8 thousand, that there</p> <p>3 wasn't a profit in it for G4S by the increased capacity?</p> <p>4 A. Absolutely. As I said earlier, I'm not embarrassed</p> <p>5 about that because there was increased workload, and so</p> <p>6 forth.</p> <p>7 Q. Just give me a moment because some of the pagination</p> <p>8 doesn't work out the same as slides per page. I'm</p> <p>9 trying to find a page here. I'll find it in a moment.</p> <p>10 Let's go back to Nathan Ward's statement, please,</p> <p>11 <DL0000141> at page 32. Do you see paragraph 96:</p> <p>12 "Whilst I was still there, plans also started to be</p> <p>13 made to increase bed space by an additional 60 beds by</p> <p>14 introducing a third bed in 60 of the cells. As I set</p> <p>15 out below, I had already raised serious concerns about</p> <p>16 the cell sizes, the impact on detainees' mental health</p> <p>17 and whether they met international standards.</p> <p>18 Stephen Shaw equally raised concerns about the</p> <p>19 introduction of three-man cells in his 2016 report after</p> <p>20 visiting Brook House in May 2015, and set out his</p> <p>21 disappointment in his 2018 report that it went ahead,</p> <p>22 stating 'I did not find the conditions in those rooms</p> <p>23 remotely acceptable or decent'. The introduction of</p> <p>24 these additional 60 bed spaces via three-man cells, at</p> <p>25 the clear expense of detainee welfare, ultimately went</p> <p style="text-align: center;">Page 60</p> |

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| <p>1 ahead in 2015/16 because it was a cost-effective way for</p> <p>2 the Home Office to advance their overriding aims of</p> <p>3 increasing the detention estate and removals which also</p> <p>4 allowed G4S to increase their profit. Ben Saunders</p> <p>5 confirms at page 24 of the 360-degree review that it was</p> <p>6 estimated that the introduction of these additional</p> <p>7 60 beds would overall increase revenue by £1.5 million</p> <p>8 per year with a profit margin of £91,000 per year."</p> <p>9 Although I've struggled to find it in the document,</p> <p>10 but I know it is here, we have Mr Nathan -- or</p> <p>11 Reverend Nathan setting out what the figures were.</p> <p>12 I suppose your answer is going to be the same,</p> <p>13 Mr Petherick: it doesn't take account of company</p> <p>14 overheads and all the rest of it?</p> <p>15 A. That would be correct.</p> <p>16 Q. But, nonetheless, a profit is still being made by the</p> <p>17 addition --</p> <p>18 A. Yes.</p> <p>19 Q. -- of the 60 beds? You say at your paragraph 48 of your</p> <p>20 witness statement, if we can go to that, please:</p> <p>21 "This decision followed discussions between the</p> <p>22 Home Office and G4S. As I recall, those discussions</p> <p>23 arose out of a wish by the Home Office to maximise the</p> <p>24 safe usage of the IRC estate and to deal with population</p> <p>25 pressures."</p> <p style="text-align: center;">Page 61</p> | <p>1 rating:</p> <p>2 "Brook House beds proposal increase by 60 beds</p> <p>3 (ongoing -- revenue £1.5m, margin \$91k).</p> <p>4 "(Estimated start-up revenue £3.9m. Start-up margin</p> <p>5 £232k)."</p> <p>6 Do you know what that refers to?</p> <p>7 A. Yes. To increase the capacity, we had to take on</p> <p>8 additional staff, we had to put in further fixtures,</p> <p>9 fitting and equipment, FF&E, and so forth. So that</p> <p>10 would be entirely normal with any new initiative, any</p> <p>11 new development, that there would be start-up revenue,</p> <p>12 which was a one-off cost, and treated as a one-off cost,</p> <p>13 and on which a margin would be applied.</p> <p>14 Q. So when we think about it, it is not just putting in</p> <p>15 60 beds, making three-man rooms. In the case of</p> <p>16 the additional capacity, it is also catering, in terms</p> <p>17 of fixtures and fittings for 60 more men, so, what, more</p> <p>18 tables, more --</p> <p>19 A. More beds, more tables, more laundry, sheets, et cetera.</p> <p>20 All of those kind of additional hotel costs, for want of</p> <p>21 a better phrase, that you would need to accommodate.</p> <p>22 But I would anticipate the major element there would be</p> <p>23 the increase in staffing the recruitment costs, and so</p> <p>24 forth.</p> <p>25 Q. I'm sure you would agree, Mr Petherick, "hotel" is</p> <p style="text-align: center;">Page 63</p> |
| <p>1 What were the population pressures?</p> <p>2 A. These primarily relate to the fact that the Home Office,</p> <p>3 in effect, had an agreement with the Prison Service, or</p> <p>4 HMPPS, MOJ, that a certain number of detainees would be</p> <p>5 held in prison accommodation, as opposed to the IRC</p> <p>6 estate.</p> <p>7 As population pressures in the prison estate</p> <p>8 increased, as I recall, the Prison Service wanted to</p> <p>9 reduce the number of beds that they were allowing the</p> <p>10 Home Office to occupy, and, at the same time, there were</p> <p>11 the -- I think the Maude initiatives as well, trying to</p> <p>12 get further efficiencies out of the public sector in the</p> <p>13 round.</p> <p>14 So I think those were the issues that were coming</p> <p>15 together: the population drive in the prisons, meaning</p> <p>16 that the Prison Service needed to utilise those beds,</p> <p>17 therefore, the Home Office had to find other capacity.</p> <p>18 That's my recollection, anyway.</p> <p>19 Q. As you say, it was a wish by them to maximise the safe</p> <p>20 usage of the IRC estate.</p> <p>21 A. Mmm-hmm.</p> <p>22 Q. If we go back to the review, please, at <CJS000768></p> <p>23 page 27 -- it is on the same page I have already shown</p> <p>24 you -- we have, at the foot of the page, when we get</p> <p>25 there, "Estimated March 2015". It is amber on the RAG</p> <p style="text-align: center;">Page 62</p> | <p>1 a little unfortunate. But, in a cramped building like</p> <p>2 this, nonetheless, 60 beds -- I mean, it was your word,</p> <p>3 it was cramped space, when you spoke to Verita. 60 beds</p> <p>4 isn't going to augment the experience of the detained</p> <p>5 men there, is it?</p> <p>6 A. No, it's not. But we also have to remember the timing</p> <p>7 at which this was done. There was an increase in the</p> <p>8 challenging population in the period after this.</p> <p>9 Q. When you say "the challenging population", what do you</p> <p>10 mean? The time-served foreign national offenders or</p> <p>11 others?</p> <p>12 A. Well, they were some of them, not entirely. And I think</p> <p>13 it's -- throughout all of this, it's very easy to</p> <p>14 demonise, for want of a better phrase, the time-served</p> <p>15 foreign national offenders. That would be wrong. You</p> <p>16 shouldn't stereotype a group of people in that way.</p> <p>17 I think it was about a number of issues. Some of those</p> <p>18 are, in my view, societal; some of them it's about</p> <p>19 different drug usage that was happening, both within the</p> <p>20 custodial estate and in society generally, and that</p> <p>21 changed behaviours that we were having to deal with, and</p> <p>22 the cohort became more challenging.</p> <p>23 Q. You've got time-served foreign national offenders, on</p> <p>24 the one hand, you've got an unconvicted detainee</p> <p>25 population, some of whom, including some of</p> <p style="text-align: center;">Page 64</p> |

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| <p>1 the time-served foreign national offenders, have</p> <p>2 vulnerabilities, mental health issues, and you have an</p> <p>3 increase in spice use?</p> <p>4 A. That happened subsequently.</p> <p>5 Q. Subsequent to what?</p> <p>6 A. To the increase in beds.</p> <p>7 Q. Well, the beds, as we will see in a minute, the notice</p> <p>8 of change was with effect from 1 April 2017, and the</p> <p>9 spice epidemic was going on through that period, wasn't</p> <p>10 it, Mr Petherick?</p> <p>11 A. It was beginning, yes.</p> <p>12 Q. I can certainly think of instances in May and June where</p> <p>13 we had -- we have evidence of a number of medical</p> <p>14 emergencies. But it didn't start then, did it? It had</p> <p>15 been ongoing?</p> <p>16 A. I forget. I'd be guessing as to the start date. But</p> <p>17 I know it was an increasing factor in all of our lives.</p> <p>18 Q. You will remember, won't you, that, on 5 January 2017,</p> <p>19 Stacie Dean sent you an email complaining about a couple</p> <p>20 of officers in particular and bringing to your attention</p> <p>21 the fact that spice was being brought in by staff</p> <p>22 members?</p> <p>23 A. Allegedly.</p> <p>24 Q. Yes, all right, allegedly. But she brought it to your</p> <p>25 attention?</p> <p style="text-align: center;">Page 65</p> | <p>1 space and the other facilities you would expect, and</p> <p>2 because it was built around the philosophy of 72 hours,</p> <p>3 short-term holding facility, which wasn't working, and</p> <p>4 here we are putting in another 60 beds. You tell us</p> <p>5 that it was whittled down from the initial idea -- what</p> <p>6 did you tell us, 120?</p> <p>7 A. That's -- no, I think -- I think it was around 180, but</p> <p>8 I stand to be corrected on that.</p> <p>9 Q. 180. So you managed to persuade the Home Office to</p> <p>10 reduce it by two-thirds, if that's right. So what</p> <p>11 started out as a challenge was becoming a huge</p> <p>12 challenge, wasn't it, to everybody?</p> <p>13 A. Yes.</p> <p>14 Q. Not just you, but to your centre director, his deputies,</p> <p>15 DCMs, the DCOs, just about everybody, not least of all</p> <p>16 the detainees?</p> <p>17 A. It was becoming an increasing challenge, and we</p> <p>18 addressed some of that by increasing the staffing</p> <p>19 resource, we undertook a due diligence and we believed</p> <p>20 that we could operate properly at that increased number.</p> <p>21 Q. Let's have a look at the relevant documentation. Can we</p> <p>22 put up, please, <CJS0074084>, please. Here I think we</p> <p>23 will find the relevant service provider change request</p> <p>24 form. We can see the date of it, 25 January 2017,</p> <p>25 subject heading "60 additional beds Brook House</p> <p style="text-align: center;">Page 67</p> |
| <p>1 A. Yes, and those people were already on the radar, as</p> <p>2 I recall.</p> <p>3 Q. For what?</p> <p>4 A. For that kind of alleged activity.</p> <p>5 Q. But the fact is, these were ongoing problems, weren't</p> <p>6 they?</p> <p>7 A. They're ongoing problems in every custodial</p> <p>8 establishment.</p> <p>9 Q. We are not talking about every custodial establishment,</p> <p>10 Mr Petherick. We are talking about Brook House.</p> <p>11 A. I agree, but we also have to look at the context, in my</p> <p>12 view.</p> <p>13 Q. What is the context?</p> <p>14 A. Of the entire custodial estate and, as you say, the</p> <p>15 challenges that are increasing.</p> <p>16 Q. But, again, not every other prison within the estate was</p> <p>17 having an additional 60 beds on top of 22, which had</p> <p>18 been put in a few years before?</p> <p>19 A. Quite a few were, actually.</p> <p>20 Q. But, again, we are not interested in them. We are</p> <p>21 interested in Brook House. It is just -- you know, the</p> <p>22 impression being created of a building, an environment,</p> <p>23 where, as you said earlier, because it was designed to</p> <p>24 a category B specification but was not a category B</p> <p>25 prison, but at the same time didn't have the outside</p> <p style="text-align: center;">Page 66</p> | <p>1 operating price and start-up cost". "Reasons for</p> <p>2 change: Other". Two documents were attached, a couple</p> <p>3 of Excel spreadsheets, and the details of change, if we</p> <p>4 can just scroll up a bit:</p> <p>5 "The operating and start-up cost of 60 additional</p> <p>6 beds at Brook House, raising the operational detainee</p> <p>7 capacity from 448 to 508.</p> <p>8 "Brook House will be charged at the current</p> <p>9 operating price until 1 April 2017 when we anticipate</p> <p>10 the 60 extra beds to go live or earlier should the beds</p> <p>11 go live sooner.</p> <p>12 "Please note changes to Brook House from</p> <p>13 1 January 2017 to 31 March 2017."</p> <p>14 Do you know what those changes were?</p> <p>15 A. No, I don't, I'm afraid.</p> <p>16 Q. "Brook House now includes:</p> <p>17 "The reduction in price for the contract extension.</p> <p>18 "Hence the annual price for Brook House is</p> <p>19 £11,270,271.04 as at 1 January 2017.</p> <p>20 "Please note the changes to Brook House from</p> <p>21 1 April 2017 to 19 May 2017."</p> <p>22 This must be some sort of formulaic approach to</p> <p>23 these forms. What was the change, any idea, from</p> <p>24 1 April, other than the beds and the fixtures and</p> <p>25 fittings?</p> <p style="text-align: center;">Page 68</p> |

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| <p>1 A. No.</p> <p>2 Q. "Brook House now includes:</p> <p>3 "The reduction in price for the contract extension.</p> <p>4 "The price for 60 additional beds.</p> <p>5 "Hence the annual price for Brook House is</p> <p>6 £12,319,968.37 as at 1 April 2017.</p> <p>7 "The current start-up (mobilisation costs) is</p> <p>8 £167,022.13 as per attached.</p> <p>9 "Should there be any further start-up costs</p> <p>10 unforeseen, we will consult with you and add</p> <p>11 accordingly."</p> <p>12 Again, not signed by you, but your name is on the</p> <p>13 bottom of this form. Over the page. There we are. If</p> <p>14 we go back to the guts of it, please. What did it mean</p> <p>15 under the final bullet point:</p> <p>16 "Brook House now includes:</p> <p>17 "The reduction in price for the contract extension."</p> <p>18 Was there a contract extension?</p> <p>19 A. As I recall, there was, for a two-year period. I stand</p> <p>20 to be corrected on that.</p> <p>21 Q. Yes.</p> <p>22 A. But that's my recollection.</p> <p>23 Q. Why, in 2017 -- if the original contract was 2008 and</p> <p>24 lasted ten years, and we know that there was a process</p> <p>25 for a rebid, which started around the end of 2016, it</p> <p style="text-align: center;">Page 69</p> | <p>1 A. Mmm-hmm.</p> <p>2 Q. "... after additional beds (Date to be confirmed)". We</p> <p>3 saw 19 May on the service provider request form. If we</p> <p>4 can scroll up some more, we can see the two figures. On</p> <p>5 the left-hand side, what the contract price was,</p> <p>6 11,270,271, and with the 60 beds on the right-hand side</p> <p>7 at the bottom of the red column, £12,319,968. So that</p> <p>8 was the price summary on that Excel spreadsheet.</p> <p>9 If we keep that figure in mind, can we go to another</p> <p>10 document now, please, <HOM000859>. This is a notice of</p> <p>11 change form, isn't it, Mr Petherick?</p> <p>12 A. It is.</p> <p>13 Q. It comes from the Home Office.</p> <p>14 A. Yes.</p> <p>15 Q. It is addressed to you. It is dated 27 January. So it</p> <p>16 comes two days after your service provider request form</p> <p>17 date, which was the 25th, which means all of this must</p> <p>18 have been agreed previously and this is just formalising</p> <p>19 the whole position?</p> <p>20 A. That would be the norm, yes.</p> <p>21 Q. We can see the subject line, as it were, or lines:</p> <p>22 "Contract dated 11 February 2008 between</p> <p>23 Her Majesty's Principal Secretary of State for the Home</p> <p>24 Department and GSL ..."</p> <p>25 So that tells us that was the original contract</p> <p style="text-align: center;">Page 71</p> |
| <p>1 was being written in around January 2017, so around this</p> <p>2 period of time, with a deadline of February 2017, can</p> <p>3 you understand why there would have been a two-year</p> <p>4 contract extension around this period?</p> <p>5 A. I'm trying to recall. The original contract was for</p> <p>6 a set period, plus the ability to increase it by two</p> <p>7 years. Whether it was an eight-year plus two or a ten</p> <p>8 plus two, I can't recall, but that's my -- as I say,</p> <p>9 that's my recollection.</p> <p>10 Q. If we then go to another document I'd like you to look</p> <p>11 at, <CJS0074086>, please. I hope it comes up in the</p> <p>12 right way. It is an Excel spreadsheet. If we go to the</p> <p>13 "BH Price" tab below, if we scroll it up a bit. I don't</p> <p>14 know if you can reduce the size of it a bit, Zaynab, can</p> <p>15 you, so we can get it all on screen? Yes. I don't want</p> <p>16 to go into all of it too much, but we see the two yellow</p> <p>17 boxes either side of this spreadsheet. Can we just</p> <p>18 scroll down a bit to see the top. Is that the very top,</p> <p>19 Zaynab? We can see the dates, 2016/2017, and on the</p> <p>20 right, column BV, "2016/2017", so we can see the year</p> <p>21 period. If we can scroll up to the big yellow boxes, on</p> <p>22 the left-hand side, from 1 January to 31 March 2017,</p> <p>23 before additional beds, and on the right-hand side, from</p> <p>24 1 April 2017 to 20 May -- do you remember we saw those</p> <p>25 dates?</p> <p style="text-align: center;">Page 70</p> | <p>1 date:</p> <p>2 "... for the operation, maintenance and management</p> <p>3 of Brook House Immigration Removal Centre, Gatwick ...</p> <p>4 "Notice of change 121 -- 60 additional beds.</p> <p>5 "By this letter I give notice to you on behalf of</p> <p>6 the authority that pursuant to clause 13 of the contract</p> <p>7 (changes), the authority requires you to alter the</p> <p>8 extent of the service provider's obligations under the</p> <p>9 contract as set out in this notice of change.</p> <p>10 "I am in receipt of your service provider change</p> <p>11 request (form A) ... of 25 January 2017 with regards to</p> <p>12 the provision of an additional 60 detention spaces at</p> <p>13 Brook House.</p> <p>14 "The increased capacity at Brook House will be</p> <p>15 508 beds which will take effect from 1 April 2017 (or</p> <p>16 from the date that the beds become operational,</p> <p>17 whichever is the sooner). The revised annual operating</p> <p>18 fee shall be ..."</p> <p>19 We can see the same figure we saw in the right-hand</p> <p>20 column on the Brook House price tab of the Excel</p> <p>21 spreadsheet:</p> <p>22 "... per annum as set out in your service provider</p> <p>23 change request (form A) and as set out in the table</p> <p>24 below."</p> <p>25 If we just go down, please, "Ongoing costings", G4S</p> <p style="text-align: center;">Page 72</p> |

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| <p>1 staff, 21, £655,000-odd. What does the 21 indicate to</p> <p>2 you?</p> <p>3 A. I would read that as 21 additional staff of whatever</p> <p>4 grade, but that's subject to confirmation. That's my</p> <p>5 interpretation.</p> <p>6 Q. And other costs, medical services, catering/cleaning,</p> <p>7 maintenance and waste disposal, utilities. Then over</p> <p>8 the page, admin and office expenses, operational</p> <p>9 expenses, vehicle costs, regime and residence, legal,</p> <p>10 insurance, asset replacement, and then the total is</p> <p>11 given as £976,000. G4S markup at 6.38 per cent. Does</p> <p>12 that indicate that that was the profit G4S was making on</p> <p>13 the contract at this period?</p> <p>14 A. I believe that was the percentage we used on all of</p> <p>15 these notices to change.</p> <p>16 Q. Total annual operating cost, £108,379. Indexation at</p> <p>17 1.09 per cent. What was the indexation for?</p> <p>18 A. Every contract has an indexation mechanism built into</p> <p>19 the contract. They vary from the indices that were used</p> <p>20 as the factor to calculate that from. Generally, the</p> <p>21 indexation annual review would happen on the anniversary</p> <p>22 of the contract.</p> <p>23 Q. Right.</p> <p>24 A. I forget what the indices used for Brook House was.</p> <p>25 Q. We see there that the total indexed price is</p> <p style="text-align: center;">Page 73</p> | <p>1 That can't be right, can it --</p> <p>2 A. No, it can't.</p> <p>3 Q. -- because that would be October 2016:</p> <p>4 "... what was the process under which that happened?</p> <p>5 "Answer: As I recall, approach from the Home Office</p> <p>6 for us to increase. We then looked at it, made our</p> <p>7 plans, made our proposals, and it went through the</p> <p>8 normal notice of change process under the contract, and</p> <p>9 that is standard contractual stuff.</p> <p>10 "As part of our analysis ... health and safety."</p> <p>11 We have redacted the name, but you had an individual</p> <p>12 in G4S who did the health and safety work for you?</p> <p>13 A. I had, in my business, a health and safety manager</p> <p>14 advisor who undertook the work for me. He would</p> <p>15 interact with the site health and safety advisors.</p> <p>16 Q. Don't name him, please.</p> <p>17 A. No, sure.</p> <p>18 Q. Was he a specialist?</p> <p>19 A. Yes, he was.</p> <p>20 Q. "... health and safety, did the safety reviews, so fire</p> <p>21 loading, fire alarms, et cetera, and that was basically</p> <p>22 the process. It was normal contract change."</p> <p>23 I suppose what it doesn't measure are all the other</p> <p>24 things that perhaps are less obvious -- health and</p> <p>25 safety, fire loading, fire alarms, but, I mean, we have</p> <p style="text-align: center;">Page 75</p> |
| <p>1 £1,049,697.34. Even with my fairly basic arithmetic,</p> <p>2 I think, if you deduct from the new contract price of</p> <p>3 £12,319,968.37 per annum the new price of the contract</p> <p>4 and deduct from it the price before the 60 additional</p> <p>5 beds, which we saw on the Excel spreadsheet, which was</p> <p>6 £11,270,271-odd, that's the figure you come to. So it</p> <p>7 is effectively the difference between both contracts?</p> <p>8 A. Mmm-hmm.</p> <p>9 Q. So what this is showing us is this was the price, the</p> <p>10 extra price, of the 60 additional beds with all of</p> <p>11 the nuts and bolts --</p> <p>12 A. Yes.</p> <p>13 Q. -- of what went into the overheads in order to arrive at</p> <p>14 the new fee, not forgetting that the G4S markup at</p> <p>15 6.38 per cent was, according to this, £62,000-odd. The</p> <p>16 cost per day per bed for 60 beds was £47.90. So that</p> <p>17 shows us what the costing was.</p> <p>18 If we can just go back to your Verita interview,</p> <p>19 please, <VER000263> at page 15, at line 261, you can see</p> <p>20 at 260 the questioner says:</p> <p>21 "Question: Perfect. Therefore, contracts and plan</p> <p>22 for staffing levels, before, after and in the new bid.</p> <p>23 "Going to the 60, when the 60 were moved in</p> <p>24 in October (I think they arrived in October last</p> <p>25 year) ..."</p> <p style="text-align: center;">Page 74</p> | <p>1 heard, for example, that there were concerns vocalised</p> <p>2 by certain individuals, for example, Michelle Brown, and</p> <p>3 others, about accessibility to a bunk bed in a control</p> <p>4 and restraint incident, and those problems. Was that</p> <p>5 something health and safety would look at?</p> <p>6 A. Indeed, and we looked at things such as the brackets on</p> <p>7 which TVs were located, we went into it in a lot of</p> <p>8 detail. And we should remember that bunk beds are often</p> <p>9 a feature of, in Prison Service, prison cells, and so</p> <p>10 C&R techniques are taught and are experienced in that</p> <p>11 way.</p> <p>12 Q. So it would also require extra training?</p> <p>13 A. No, not necessarily. The C&R course should cover that,</p> <p>14 and the tornado -- were we to use tornado troops, they</p> <p>15 would be experienced in that.</p> <p>16 Q. Forget them. But what about your DCOs and DCMs?</p> <p>17 A. That should form part of the C&R syllabus, which is</p> <p>18 a nationally approved syllabus.</p> <p>19 Q. What, to cope with detainees on bunk beds?</p> <p>20 A. In all situations.</p> <p>21 Q. But when you didn't have bunk beds, would the training</p> <p>22 have included that?</p> <p>23 A. I would have expected it to. I can't sit here and say</p> <p>24 definitively it did.</p> <p>25 Q. So Mr Marsden says at 264:</p> <p style="text-align: center;">Page 76</p> |

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| <p>1 "Question: Did they say, 'We want to put 60 more 2 people in', or did they say -- 3 "Answer: 'What can you do?'. 4 "Question: Yes. Can you write this more 5 efficiently? Can you squeeze more value, as they would 6 see it, out of the contract? 7 "Answer: As I recall, there was no number given for 8 us." 9 You have told us there were 180. 10 A. That's my recollection. That's where it started off. 11 Q. Yes: 12 "Answer: My recollection, which is probably 13 imperfect, is that it was at a time when the 14 Prison Service was struggling with numbers, because, as 15 you know, there is an agreement with Home Office and MOJ 16 [Ministry of Justice] about the number of time-served 17 foreign national offenders in the prison system, and 18 that ebbs and flows depending on the national 19 population, which is why it was then transferred from 20 prisons to detention and is now being reversed." 21 So that's what you had to say about the 60 beds. As 22 Reverend Ward said in his witness statement, and I'm 23 sure you know this, Mr Shaw, Stephen Shaw, reported 24 in January 2016 -- we don't need to look at it, but you 25 must have looked at his report in the past, I would have</p> <p style="text-align: center;">Page 77</p> | <p>1 have been considered by the Home Office when they were 2 agreeing to the proposal. I am sure that we had 3 discussions about that. It was an opinion, a valued 4 opinion, but it was one of the opinions. 5 Q. Clearly not listened to? 6 A. Well, the 60 beds went ahead, so -- 7 Q. Clearly not listened to -- 8 A. -- in that sense -- 9 Q. -- in that sense. And it wasn't the only opinion. Can 10 we put up <VER000117> at page 5. Can we just go back to 11 the first page, Zaynab, please. Sorry. This is the 12 HMIP report. This was an inspection by the inspector. 13 You can see the date, 31 October to 11 November 2016. 14 A. Yes. 15 Q. Presumably, you're aware of this report, Mr Petherick? 16 A. I am. 17 Q. On page 5, we can see it is dated January 2017 by 18 Peter Clarke, the Chief Inspector of Prisons. In the 19 penultimate paragraph: 20 "This report makes a number of detailed 21 recommendations about the treatment of detainees and the 22 conditions in which they are held. I would add 23 a cautionary note on an issue that is not the subject of 24 a specific recommendation but has the potential to 25 adversely affect the conditions in which some detainees</p> <p style="text-align: center;">Page 79</p> |
| <p>1 thought, Mr Petherick. 2 A. Mmm, I have. 3 Q. He said, just for reference, chair, at <INQ000060> page 4 45, paragraphs 3.4 to 3.5, that, given the pressure on 5 other facilities, he didn't think it should go ahead. 6 Clearly it was in the pipeline and, in January 2016, he, 7 having inspected Brook House, was reporting this should 8 not go ahead, and you say -- and if you care to refresh 9 your memory, it is your paragraph 56 of your witness 10 statement, final sentence: 11 "I would however have expected Mr Shaw's opinion to 12 have been duly considered." 13 A. Yes. 14 Q. Was it? 15 A. A couple of things there, if I may. 16 Q. Yes. 17 A. You referred to Stephen Shaw inspecting Brook House. It 18 wasn't an inspection. 19 Q. It was my word. 20 A. He was conducting a review. 21 Q. It is my word. 22 A. I just link "inspection" to -- 23 Q. I appreciate that. It is a word, Mr Petherick. 24 I wasn't being formal about it. 25 A. Sure. I would expect his -- Simon -- Stephen's view to</p> <p style="text-align: center;">Page 78</p> | <p>1 are held: the proposal to bring into use the third bed 2 which has been installed in 60 of the two-person cells. 3 Many staff and detainees were of the view that this 4 would lead to a decline in living standards. This is 5 a view shared by inspectors." 6 Do you think that was considered? 7 A. Yes. And, ultimately, the Home Office decided to 8 proceed with notice of change. 9 Q. So, in the end, Mr Petherick, when a change like this 10 takes place, and a substantive change, in the end, what 11 the Home Office says goes? 12 A. Ultimately, we are their contractor, and if they decide 13 to increase the accommodation, yes. As I said earlier, 14 we mitigated, as much as we could, the impact and so 15 forth. 16 Q. I said I'd come back to one of the quarterly executive 17 oversight board meeting documents. Can we put up, 18 please, <CJS0074096>, please. We will look at the front 19 page, first of all. Here we have executive oversight 20 board meeting input, and it is dated 2 March. Another 21 document we may come to look at is called "Meeting 22 papers", or "paper". This is an input. What does this 23 signify? 24 A. Without seeing the rest of it, my expectation, this is 25 the document that we would prepare in advance of</p> <p style="text-align: center;">Page 80</p> |

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| <p>1 the executive oversight board which formed the basis for</p> <p>2 many of the discussions.</p> <p>3 Q. When you say "we prepared", who is the "we"?</p> <p>4 A. Well, the company, G4S, but that responsibility comes</p> <p>5 down to myself and I flow it down initially to the</p> <p>6 establishment to prepare their report and then I have</p> <p>7 a look at it and amend it as I see fit.</p> <p>8 Q. Tell us who you mean by "the establishment"?</p> <p>9 A. It would be the director, primarily.</p> <p>10 Q. Of?</p> <p>11 A. In this case, Brook House.</p> <p>12 Q. Ben Saunders?</p> <p>13 A. Yes.</p> <p>14 Q. Let's look at the agenda on page 2, just to put things</p> <p>15 in context. You have got "Introductions/reviews of</p> <p>16 actions", and you have got how much time is allocated to</p> <p>17 each topic, or agenda item, and who is taking the lead</p> <p>18 on it. Then "Review of meeting expectations", all of</p> <p>19 which is ten minutes. Item 3, "Home Office initiatives</p> <p>20 and aspirations". And then 4, "Current G4S contracts</p> <p>21 and possible opportunities". 5, "Relationship</p> <p>22 review/discussion" and, 6, "Summarise agreed actions".</p> <p>23 Then there are annexes A, B, C and D.</p> <p>24 Annex A, we will see, is high-level summary of</p> <p>25 activity, and that's what I want to go to now, so if we</p> <p style="text-align: center;">Page 81</p> | <p>1 So another 43 beds were going into Tinsley as well?</p> <p>2 A. Yes.</p> <p>3 Q. "... are being progressed with HOPG colleagues."</p> <p>4 "HOPG"? "Home Office ..."?</p> <p>5 A. Home Office purchasing group/procurement group? I'm</p> <p>6 guessing there, but it would seem logical.</p> <p>7 Q. Too many acronyms, Mr Petherick.</p> <p>8 A. Indeed. I would agree with that.</p> <p>9 Q. "Discussion continues around maintenance related</p> <p>10 issues ..."</p> <p>11 Do you want to help us with "AHUs"?</p> <p>12 A. I think that refers to air-conditioning units at</p> <p>13 Tinsley House, but that's a recollection, and I stress</p> <p>14 that. Air handling units, I think.</p> <p>15 Q. I think I'm brave enough to handle the next one:</p> <p>16 "[Notices of change] issued around additional beds</p> <p>17 and closure of Cedars and relocation of PDA ..."</p> <p>18 Predeparture accommodation?</p> <p>19 A. Predeparture accommodation at Cedars. This was a small</p> <p>20 facility, run -- about 8 to 10 miles away, which</p> <p>21 accommodated families for that period.</p> <p>22 Q. So, what, that was being closed?</p> <p>23 A. It was.</p> <p>24 Q. And Tinsley House had to, what, take up the slack?</p> <p>25 A. The history was very much Tinsley House used to have</p> <p style="text-align: center;">Page 83</p> |
| <p>1 can move on, please, to page 7 of this document. There</p> <p>2 we have at the top -- there are four pages of it, but</p> <p>3 this relates to "Immigration Removal Centres -</p> <p>4 Brook House/Tinsley House", and on the left side we have</p> <p>5 the authority's view with a green arrow, a horizontal</p> <p>6 yellowy-amber coloured two-way arrow and a red one going</p> <p>7 in the wrong direction. Presumably, that's an arrow</p> <p>8 nobody wants to see?</p> <p>9 A. Indeed.</p> <p>10 Q. So green is good, amber you can probably just about live</p> <p>11 with, red, nobody wants to see?</p> <p>12 A. And the actual arrows show direction of travel.</p> <p>13 Q. We have, presumably, in the two columns we can see, one</p> <p>14 is amber, "Rating/trend" and on the right-hand side of</p> <p>15 the supplier's view, the "Rating/trend" -- is that,</p> <p>16 again, a RAG rating?</p> <p>17 A. It is.</p> <p>18 Q. What we have is, let's have a quick run-through. On the</p> <p>19 left-hand side, the authority's view. This is the</p> <p>20 high-level summary of activity. It is 2 March, so we</p> <p>21 are looking backwards, are we, presumably?</p> <p>22 A. Yes.</p> <p>23 Q. "G4S run Brook House and Tinsley House IRCs:</p> <p>24 "Plans to increase capacity within Brook (+ 60) and</p> <p>25 Tinsley ..."</p> <p style="text-align: center;">Page 82</p> | <p>1 a families unit. That closed and the Cedars opened and</p> <p>2 then Cedars closed and the family unit came back into an</p> <p>3 enhanced area of Tinsley House.</p> <p>4 Q. "Additional security fencing has been completed</p> <p>5 following an escape at Brook House."</p> <p>6 A. Yes.</p> <p>7 Q. Do you remember when that was?</p> <p>8 A. It would link in to -- and I only know because of</p> <p>9 issues -- it was actually the first day of Lee Hanford's</p> <p>10 tenure as the interregnum director.</p> <p>11 Q. Was that about January -- it can't be 2016?</p> <p>12 A. March, I would say, 2018 --</p> <p>13 Q. It can't be 2018.</p> <p>14 A. No. I'd have to --</p> <p>15 Q. Well, I mean, you fixed it. We can find the date but</p> <p>16 you think it was around the early part of Lee Hanford's</p> <p>17 tenure?</p> <p>18 A. It was the first day, as I recall. It was a welcome</p> <p>19 present.</p> <p>20 Q. Which must have cost the company?</p> <p>21 A. It did.</p> <p>22 Q. We will look at penalty points a little later and other</p> <p>23 significant performance problems/failures:</p> <p>24 "The refurbishment of Tinsley continues. This</p> <p>25 includes new accommodation for predeparture</p> <p style="text-align: center;">Page 84</p> |

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| <p>1 accommodation and Border Force cases. Building works 2 should be completed by 24 April. 3 "Bidders for the Gatwick IRC contract re-tender will 4 be visiting the sites first week of March." 5 So this is about the new bid for the new contract: 6 "Delivery is to a good standard with the level of 7 performance deductions overall being low. 8 "Application of PMs ..." 9 A. Performance measures. 10 Q. "... suspended for Tinsley whilst closed." 11 So that was the Home Office's view. On the right 12 side, G4S: 13 "Good performance against the contract with low 14 level of performance penalties." 15 So was that regarded as a good thing: fewer 16 performance penalties, G4S was doing well? 17 A. I think, by definition, in any contract, if you have 18 fewer penalties, then performance is better, yes. 19 Q. "Brook House additional beds completed, awaiting fire 20 engineer work to be completed for assurance that the 21 critical safety systems have not been adversely 22 impacted. 23 "Tinsley House beds due to activate week commencing 24 1 May 2017. 25 "Mobilisation and operating costs agreed for the</p> <p style="text-align: right;">Page 85</p> | <p>1 So there we have it by 2 March, which is before our 2 relevant period, it is certainly prevalent. So that is 3 the quarterly executive oversight board paper -- input 4 paper for 2 March. 5 Was the contract extended? Let's assume it wasn't 6 ten years and it was eight years with a two-year 7 extension. Maybe we can't assume it. But was the 8 contract extended on the strength of the HMIP -- 9 A. No, no, no. The contract extension would be on a far 10 more wide-ranging consideration. 11 Q. Would that be an aspect, a factor, the Home Office would 12 take account of, do you think? 13 A. I would assume so, yes. 14 Q. Then, just picking up the chronology, Stephen Shaw does 15 his follow-up report, which is dated July 2018, and 16 recommendation 8, again, we don't need to look at it, 17 but it is <HOM032600> at page 33, paragraph 2.78. 18 Recommendation 8: 19 "In future, capacity in the immigration estate 20 should not be increased by adding extra beds [he said] 21 to rooms designed for fewer occupants. Where this has 22 already occurred, for example, Campsfield House, 23 Brook House ..." 24 Is it Campsfield or Campsfield? 25 A. Campsfield.</p> <p style="text-align: right;">Page 87</p> |
| <p>1 additional beds at a reduced bed price. 2 "Brook House inspected by HMIP in November -- all 3 outcomes judged as 'reasonably good' which is 4 a consistent improvement on previous inspections." 5 That's a reference back to the HMIP report -- 6 A. Correct. 7 Q. -- I showed you a few moments ago: 8 "Courtyard fencing installed -- Brook House escape 9 action plan completed. 10 "Contract extended for 1 year with £120,000 savings 11 returned to the Home Office." 12 Any idea what those savings were? 13 A. No, I don't, at this stage. 14 Q. When it says "£120,000 savings returned to the 15 Home Office", what does that mean? What does "returned 16 to" mean? 17 A. In effect, we would have billed £120,000 less. 18 Q. "Collaborative working with the Home Office on the 19 pre-departure pilot going very well, which has seen an 20 increase in voluntary and unescorted returns. 21 "Increase in NPS ..." 22 That's new psychoactive substances? 23 A. Correct. Spice. 24 Q. "... prevalence particularly linked with the FNO 25 population at Brook."</p> <p style="text-align: right;">Page 86</p> | <p>1 Q. "... these extra beds should be removed and capacity 2 reduced or extra space created." 3 Were they removed? 4 A. That's my recollection, but, again, there is some 5 haziness on it. 6 Q. Where and why? 7 A. I can't say when. Why? Partly because of Stephen's 8 recommendations and further consideration, as the 9 dynamics changed, is my -- 10 Q. Sorry, forgive me. 11 A. That's my recollection. 12 Q. What happened to the extra £1 million a year that G4S 13 was getting for them? 14 A. I assume that it has been returned, but that's post my 15 departure. 16 Q. Which was August 2019. 17 A. 2019, yes. 18 Q. Can we also look, please, while we have these oversight 19 executive board -- or executive board oversight meetings 20 in mind, <CJS0074098>, please. Stop at the first page, 21 to begin with. Slightly differently titled, "Executive 22 oversight board meeting papers", rather than "meeting 23 input". Same thing, different title? 24 A. I think same thing, different title. I stand to be 25 corrected on that, but that's my interpretation.</p> <p style="text-align: right;">Page 88</p> |

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| <p>1 Q. The date of it is 20 June 2017. If we turn on to</p> <p>2 page 2, we will see the agenda items. The first four</p> <p>3 look pretty similar to the ones we saw on 2 March -- in</p> <p>4 fact, they are probably all fairly similar apart from,</p> <p>5 I think, 6 and 7. Again, four annexes, and it is the</p> <p>6 one at page 8 I want to go to, annex A, the high-level</p> <p>7 summary of activity. Again, a similar thing as before.</p> <p>8 No green, amber or red in the authority's view</p> <p>9 rating/trend column. Is that alarming, Mr Petherick, or</p> <p>10 not?</p> <p>11 A. I'm just reading the --</p> <p>12 Q. Let's read together:</p> <p>13 "Brook House -- There is a good relationship between</p> <p>14 the supplier and the authority with both organisations</p> <p>15 working together to resolve issues. Incidents have</p> <p>16 increased but this is primarily related to all incidents</p> <p>17 now being logged and reported upon by the IRC."</p> <p>18 What kind of incidents did it have in mind?</p> <p>19 A. That, I can't say without the detail, but there are</p> <p>20 a whole list, and I know in the bundle there's the</p> <p>21 required reporting incidents -- or the policy for the</p> <p>22 C&DS. So it would be potentially all of those involved</p> <p>23 in that list.</p> <p>24 Q. "The centre has seen an increase in official visits over</p> <p>25 the past few months but these have reduced this month.</p> <p style="text-align: center;">Page 89</p> | <p>1 So that bullet point focuses, what, on throughput of</p> <p>2 detainees?</p> <p>3 A. Mmm-hmm.</p> <p>4 Q. "official visits"? Who visits?</p> <p>5 A. That could range from the minister to Permanent</p> <p>6 Secretary to whoever. We tend to use that phrase.</p> <p>7 Q. "... charter moves, incidents at height", what does that</p> <p>8 mean?</p> <p>9 A. "Incidents at height", the technical explanation is, if</p> <p>10 a detainee or a prisoner climbs on a table or anything</p> <p>11 like that, it's an incident at height, it was used as</p> <p>12 a form of protest.</p> <p>13 Q. Like on the netting?</p> <p>14 A. Yes.</p> <p>15 Q. "Rule 40 has been challenging but effectively managed."</p> <p>16 According to whom, effectively managed?</p> <p>17 A. According both to ourselves and also the Home Office.</p> <p>18 Q. "Violence increased in the first four months of 2017,</p> <p>19 mainly low level, impulsive and spontaneous, but is</p> <p>20 a concerning increase. This dropped in May to more</p> <p>21 usual levels."</p> <p>22 Was there a more usual level? That would presumably</p> <p>23 mean acceptable level?</p> <p>24 A. No.</p> <p>25 Q. Do you understand what a "more usual level" would be?</p> <p style="text-align: center;">Page 91</p> |
| <p>1 "There is an issue with the AHU (air handling unit)</p> <p>2 at the site which has been ongoing for quite some time.</p> <p>3 The matter is being resolved between G4S and Home Office</p> <p>4 Commercial."</p> <p>5 Then it deals with a recent audit on premises</p> <p>6 resulting in non-compliance of cleaning now rectified by</p> <p>7 G4S. Then, in the right-hand area of this document,</p> <p>8 your view:</p> <p>9 "Continued good performance against the contract.</p> <p>10 "Brook House -- all 60 additional beds mobilised</p> <p>11 successfully with no adverse impact."</p> <p>12 What do those words mean, "no adverse impact"?</p> <p>13 A. My recollection is that the general environment.</p> <p>14 Q. Does it have anything to do with adverse impact on the</p> <p>15 people who have to sleep in them?</p> <p>16 A. Of course it does.</p> <p>17 Q. And the people who have to live in three-man rooms?</p> <p>18 A. I think I've said earlier that we were very aware of our</p> <p>19 responsibility for the care of the detainees.</p> <p>20 Q. Yes:</p> <p>21 "Escape action plan completed and signed off by the</p> <p>22 Home Office.</p> <p>23 "Increased throughput, official visits, charter</p> <p>24 moves, incidents at height and rule 40 has been</p> <p>25 challenging, but effectively managed."</p> <p style="text-align: center;">Page 90</p> | <p>1 A. I do understand, and, you're right, no -- nothing is</p> <p>2 acceptable, but we would look at trend lines to see if</p> <p>3 there were spikes or anything in the trend line.</p> <p>4 Q. "A violence reduction strategy is in place and reviewed</p> <p>5 monthly.</p> <p>6 "Brook continues to manage the most challenging</p> <p>7 detainees effectively, fully supporting the</p> <p>8 Home Office's excessive disruptive behaviour process."</p> <p>9 We see that there is no arrow in the right-hand box,</p> <p>10 but it is certainly green. Who rates it green: you or</p> <p>11 the Home Office?</p> <p>12 A. This was the supplier's view, so this would have been</p> <p>13 ourselves.</p> <p>14 Q. Your view, right. So that was about Brook House.</p> <p>15 Tinsley is on the next page, but we don't need to look</p> <p>16 at that. Can we go back, please, then, with all of this</p> <p>17 in mind, to Nathan Ward's witness statement,</p> <p>18 <DL0000141>, page 32. Presumably, you knew Nathan Ward</p> <p>19 quite well?</p> <p>20 A. I knew Nathan Ward.</p> <p>21 Q. Somebody you respected?</p> <p>22 A. In large part, yes.</p> <p>23 Q. In which part not?</p> <p>24 A. I think there were some frustrations with him and his</p> <p>25 contribution to the senior management team.</p> <p style="text-align: center;">Page 92</p> |

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| <p>1 Q. Such as?</p> <p>2 A. I felt he could be more supportive of the director.</p> <p>3 Q. Ben Saunders?</p> <p>4 A. Yes.</p> <p>5 Q. Paragraph 98 on page 33:</p> <p>6 "I find it difficult to understand how</p> <p>7 Jerry Petherick (and anyone else responsible for the</p> <p>8 decision in G4S and the Home Office) could have given</p> <p>9 approval for the addition of the 60 beds at Brook House.</p> <p>10 In my view it was negligent and reckless to do so. It</p> <p>11 was done without regard for the impact on detainees and</p> <p>12 I understand no equality impact assessment was</p> <p>13 undertaken."</p> <p>14 What's your response to that?</p> <p>15 A. That was his view as a junior manager with limited</p> <p>16 experience. We took a wider view, and I say "we" in</p> <p>17 consultation with the Home Office with consultation</p> <p>18 within my business, and so our view was different to</p> <p>19 his:</p> <p>20 Q. In your paragraph 67 of your witness statement, you say,</p> <p>21 talking about the environment at Brook House in your</p> <p>22 witness statement:</p> <p>23 "As to the question of whether the infrastructure</p> <p>24 had an impact on how staff treated detained persons, it</p> <p>25 would in my view have had an impact in terms of</p> <p style="text-align: center;">Page 93</p> | <p>1 we have listened to, and viewed, quite a lot of footage</p> <p>2 from the period April through to July of 2017, which</p> <p>3 Callum Tulley recorded. Making allowances for the fact</p> <p>4 that he was wearing a microphone, it just sounds like</p> <p>5 a very noisy place.</p> <p>6 A. I would accept that.</p> <p>7 Q. And quite an intimidating one as well?</p> <p>8 A. It can be intimidating. Different people will react in</p> <p>9 different ways to whether it was intimidating or not.</p> <p>10 Q. You said, and we can go to it, perhaps, let's put up</p> <p>11 back up on screen, something else you said, in your</p> <p>12 Verita interview, <VER000263> at page 10, I think, at</p> <p>13 the bottom, please, line 163, about the design of</p> <p>14 the place:</p> <p>15 "Question: In your view, the design that we</p> <p>16 currently have, which is a pretty cramped place and</p> <p>17 a pretty desolate place --</p> <p>18 "Answer: Yes."</p> <p>19 Presumably, you were agreeing with that description?</p> <p>20 A. Yes.</p> <p>21 Q. So cramped, pretty desolate. At line 165.</p> <p>22 "Question: What we are hearing is the assumption</p> <p>23 was that people were put in there in 2009 ..."</p> <p>24 Well, that's when it opened, I think, in March 2009:</p> <p>25 "... and the assumption was that people were going</p> <p style="text-align: center;">Page 95</p> |
| <p>1 detainee/staff interactions around the restrictions</p> <p>2 created by that infrastructure (such as the provision of</p> <p>3 ancillary activity space, access to open air and so</p> <p>4 forth) but not to mistreatment ..."</p> <p>5 A. No, there's no direct correlation.</p> <p>6 Q. You also say at paragraph 65, in the last third of that</p> <p>7 paragraph:</p> <p>8 "The style and construction of the wings did</p> <p>9 generate a harsh physical environment which G4S did, as</p> <p>10 much as possible, try to soften by the introduction of</p> <p>11 wall decorations, and so forth."</p> <p>12 In the end, though, it looked and felt like</p> <p>13 a prison, didn't it?</p> <p>14 A. In many ways, yes.</p> <p>15 Q. About which there was, I suppose, precious little you</p> <p>16 would say you could do?</p> <p>17 A. No, as I say here, we did our best. I think the science</p> <p>18 improved, and when I say "science", I mean building</p> <p>19 standards. I know in more recent prison establishments</p> <p>20 where noise is an issue, acoustic panels are</p> <p>21 increasingly introduced. You know, I would be arguing</p> <p>22 for the introduction of that. We tried to soften it</p> <p>23 with various wall coverings and so forth; not as</p> <p>24 effective as acoustic panels are nowadays.</p> <p>25 Q. I'm sure. We have listened, and I'm sure you have, but</p> <p style="text-align: center;">Page 94</p> | <p>1 to be there for about three days. Can that be</p> <p>2 realistic?"</p> <p>3 And your answer was "No". Over the page:</p> <p>4 "Question: It couldn't have been realistic, even at</p> <p>5 that stage, could it?</p> <p>6 "Answer: No is the answer, but the design was</p> <p>7 handed down by the Home Office and their architects,</p> <p>8 etc. I can remember we and the other providers went and</p> <p>9 gave opinions, and so forth, but, basically, it was</p> <p>10 fine-tuning. There was absolutely no debate about the</p> <p>11 actual physical structure, shape and structure."</p> <p>12 If we segue, as it were, to the 2016 HMIP report,</p> <p>13 back to <VER000117> at page 31, please, at 2.1 and 2.2,</p> <p>14 "Detainees" -- and "Expected outcomes" in this report</p> <p>15 was:</p> <p>16 "Detainees live in a safe, clean and decent</p> <p>17 environment. Detainees are aware of the rules, routines</p> <p>18 and facilities of the unit."</p> <p>19 2.1:</p> <p>20 "The residential units remained stark and impersonal</p> <p>21 in design and, as one detainee wrote to us, 'This is no</p> <p>22 centre. Is a jail. Is a prison'. No measures had been</p> <p>23 taken to make the residential wings less bleak, apart</p> <p>24 from large paintings by detainees fixed to the</p> <p>25 balustrades. There were no curtains in many of</p> <p style="text-align: center;">Page 96</p> |

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| <p>1 the cells. The toilets were divided from the living 2 area by a partial concrete partition but were screened 3 by a small curtain at best, and nothing in many cases. 4 Many toilets were in an insanitary condition and could 5 not be kept clean by detainees using the materials 6 available to them ..."</p> <p>7 At 2.2: 8 "Many cells, especially on C wing, were in too bad 9 a condition to be kept properly clean, and the flooring 10 was cracked in some toilet areas. The roof vents on the 11 wings had been opened occasionally in the summer but the 12 chief complaint among detainees was the lack of 13 ventilation in the cells: the windows did not open, 14 creating a stuffy atmosphere in many cells in spite of 15 the air-conditioning system. Detainees also experienced 16 an exacerbated sense of confinement through lack of 17 fresh air and any personal control over the environment. 18 One detainee wrote to us: 'I feel suffocated in here and 19 everyone else is as well'. Two of the four exercise 20 areas were closed for security reasons, increasing the 21 sense of confinement, although all detainees had access 22 to the yards."</p> <p>23 So, despite all the softening, Mr Petherick, by no 24 stretch of the imagination was the experience of any 25 detained person in this place going to be a pleasant</p> <p style="text-align: right;">Page 97</p> | <p>1 harsher than we would all want, the physical conditions, 2 would have, I think, a further impact. But I don't move 3 away from my very firm belief that it was -- the main 4 issue is that of the uncertainty. And I think the 5 research into detention centres would reinforce that 6 view.</p> <p>7 Q. But so that we are clear, Mr Petherick, when you leave 8 us, and the chair considers, writing up her report, what 9 your evidence is about this, you're not denying, are 10 you, that the physical environment played no part?</p> <p>11 A. I'm not arguing that at all, but I don't believe it was 12 a major part.</p> <p>13 Q. Because it is not just about the fact that this building 14 was built to category B prison specifications. We only 15 have to look at the two paragraphs that we have up on 16 the screen, which I just read out to you, of 17 the inspector's view of the conditions when the 18 inspection was made between 30 October and 19 11 November 2016, so not very long before the period 20 that this inquiry is considering. It sounds very much 21 as if no money was being spent on the place?</p> <p>22 A. No, that's not so. Money was being spent on the place. 23 I look at the common space -- the toilets, for example. 24 Forgive me for going into basic details like that, but 25 the construction materials in these toilets, and similar</p> <p style="text-align: right;">Page 99</p> |
| <p>1 one, and by no stretch of the imagination was this going 2 to be a pleasant place to live in probably for an hour, 3 let alone 72, let alone, in some instances, months. Do 4 you agree?</p> <p>5 A. It was far from what I would want, but it was 6 a structure that we were doing our best to alleviate 7 many of the inherent problems.</p> <p>8 Q. It was a prison by another name, wasn't it, and a pretty 9 nasty one, at that?</p> <p>10 A. The structures had a prison-like appearance, yes. It 11 wasn't a prison by any other name.</p> <p>12 Q. Do you accept -- of course, Mr Petherick, you're not 13 a psychologist, but do you accept that the effect on the 14 mental health of the detained men who had to live there 15 cannot have been helped by the nature of the physical 16 environment?</p> <p>17 A. I think the real issue -- and, you're right, I'm not 18 a clinician at all, but my experience would say that the 19 real issue that impacted on detainees' well-being and 20 mental health was their sense of not knowing what was 21 happening with them and the frustrations of their 22 progress towards their release either into the UK or the 23 repatriation, and so the major impact on the well-being 24 was the uncertainty of the situation they found 25 themselves in. Yes, the fact that the conditions were</p> <p style="text-align: right;">Page 98</p> | <p>1 in other locations, made it very difficult for them to 2 be cleaned because you needed to use very abrasive 3 chemicals, and so forth. So you couldn't always keep on 4 top of that. And I don't defend that, but it's 5 a balance between giving sufficiently abrasive 6 materials, which may prove to be a health risk, with the 7 need. In an ideal world, I'd have looked to different 8 compositions of the fabric, and so forth.</p> <p>9 Q. Why wasn't it an ideal world?</p> <p>10 A. Oh, I think some of it was about the construction 11 methods at that time, the ongoing issues about 12 cleanliness, there was an issue about whether we could 13 employ sufficient detainees to undertake paid work. 14 There was a lot of ongoing debate. I've rarely lived in 15 an ideal world, I must say.</p> <p>16 Q. You recognised, as we saw from the start, that this was 17 a challenging place, yet just looking at a few examples, 18 as we have, Mr Petherick, from the addition of the 22 19 beds in 2013 through to the 60 with effect from 1 April, 20 did you think it's right or wrong to say that the 21 Home Office was increasing the challenges that you faced 22 by squeezing the value and capacity out of Brook House 23 to 82 more detained persons?</p> <p>24 A. The challenges were certainly increasing, but, in 25 fairness, you need to look beyond the Home Office and</p> <p style="text-align: right;">Page 100</p> |

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| <p>1 you need to look to the Maude report proposals,</p> <p>2 et cetera, to get more efficiency out of the entire</p> <p>3 public sector, and so it's not just down to one</p> <p>4 department or other. But challenges were certainly</p> <p>5 increasing, yes.</p> <p>6 Q. It was beyond the original design?</p> <p>7 A. Yes.</p> <p>8 Q. And it was beyond the original purpose, in a sense,</p> <p>9 because it was designed as a short-term holding</p> <p>10 facility?</p> <p>11 A. Mmm-hmm.</p> <p>12 Q. Did you not think that it had the potential to turn it</p> <p>13 into a tinderbox?</p> <p>14 A. Do you know, every establishment I've worked in or been</p> <p>15 responsible for has always had that potential. So</p> <p>16 Brook House was no different.</p> <p>17 Q. I mean, we have heard certain remarks made, for</p> <p>18 example -- we spoke, you and I, about spice and the</p> <p>19 increase. We saw in one of the quarterly meeting</p> <p>20 reviews that spice was prevalent at that point?</p> <p>21 A. Mmm-hmm.</p> <p>22 Q. I think in June 2017. There was a potential, according</p> <p>23 to people who were surprised about it, that nobody had</p> <p>24 yet died. Was that ever a risk that was brought to your</p> <p>25 attention?</p> <p style="text-align: center;">Page 101</p> | <p>1 reviews.</p> <p>2 Q. Other than by ...?</p> <p>3 A. The trading reviews.</p> <p>4 Q. I think you say in your witness statement you saw</p> <p>5 a summary of them?</p> <p>6 A. Yes. Like I say, at the monthly trading reviews.</p> <p>7 Q. The idea under the contract was that G4S was expected to</p> <p>8 self-report --</p> <p>9 A. Correct.</p> <p>10 Q. -- failures --</p> <p>11 A. (Witness nods).</p> <p>12 Q. -- which, inevitably, relied upon people reporting</p> <p>13 honestly?</p> <p>14 A. Indeed.</p> <p>15 Q. Were you ever concerned that -- did you ever know</p> <p>16 whether any reports of failures under the contract were</p> <p>17 being hidden?</p> <p>18 A. No, and if I was aware, I would have taken corrective</p> <p>19 action, because my stance was very well known that</p> <p>20 I expected people to report accurately and honestly.</p> <p>21 Q. Are you confident that, in all cases, particularly</p> <p>22 during the period we are dealing with, reports were</p> <p>23 always made honestly and accurately?</p> <p>24 A. I have absolutely no evidence to the contrary.</p> <p>25 Q. Stephen Skitt made a witness statement to the inquiry.</p> <p style="text-align: center;">Page 103</p> |
| <p>1 A. I think it's a risk that we were aware of in every</p> <p>2 custodial/detention setting. We would talk about that,</p> <p>3 reflect on that and do our utmost to try to control the</p> <p>4 substances, and so forth.</p> <p>5 MR ALTMAN: Chair, it is a couple of minutes before 1.00 pm.</p> <p>6 If I invite you to have your break now for an hour,</p> <p>7 coming back at 2.00 pm, Mr Petherick, I will move to</p> <p>8 a different topic.</p> <p>9 THE CHAIR: Thank you very much.</p> <p>10 (12.57 pm)</p> <p>11 (The short adjournment)</p> <p>12 (2.00 pm)</p> <p>13 MR ALTMAN: Mr Petherick, let's now look at penalty points</p> <p>14 under the contract, please. In your witness statement,</p> <p>15 at paragraph 99 -- we don't need to look at it -- you</p> <p>16 said there was no correlation between penalties and</p> <p>17 savings; is that right?</p> <p>18 A. Correct.</p> <p>19 Q. And there was no trade-off between understaffing and</p> <p>20 savings, is what you also say?</p> <p>21 A. Mmm-hmm.</p> <p>22 Q. You were aware, were you, of monthly performance</p> <p>23 reports?</p> <p>24 A. I was aware that they would be done. I wasn't copied in</p> <p>25 to the monthly reports, other than via the trading</p> <p style="text-align: center;">Page 102</p> | <p>1 We don't need to put it up unless you wish to look at</p> <p>2 it, <SER000455> at page 55, his paragraph 191, where he</p> <p>3 says he brought in the self-reporting system which is in</p> <p>4 use today. Did you know that?</p> <p>5 A. No. But I interpret that as a refinement, as opposed to</p> <p>6 anything else, because, from day one of the contract,</p> <p>7 there would have been a system.</p> <p>8 Q. We know that he joined Brook House in 2015?</p> <p>9 A. Yes.</p> <p>10 Q. Was self-reporting just a practice, or was it something</p> <p>11 that was contractual?</p> <p>12 A. It was contractual.</p> <p>13 Q. In his witness statement -- perhaps we should put this</p> <p>14 up again, <DL0000141> at page 40, please. We are back</p> <p>15 to Nathan Ward. At the top of the page:</p> <p>16 "In my time working for G4S, I observed a number of</p> <p>17 practices that are indicative of the culture in G4S and</p> <p>18 the manipulation of information particularly in respect</p> <p>19 of staffing levels. This included reporting that people</p> <p>20 were operational when in fact they were not available to</p> <p>21 be operational, to avoid penalty points. So, for</p> <p>22 example, officers who were on training days, and were</p> <p>23 therefore not operational, were commonly recorded as</p> <p>24 being operational within the IRCs, particularly towards</p> <p>25 the end of my time at Gatwick IRCs. I became aware of</p> <p style="text-align: center;">Page 104</p> |

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| <p>1 this because I shared an office with Michelle Brown who</p> <p>2 was responsible for ensuring staffing levels met the</p> <p>3 contractual levels."</p> <p>4 At 118:</p> <p>5 "I also recall people being recorded as working full</p> <p>6 time at Brook House when they were in fact at</p> <p>7 Tinsley House, which gave a false picture of who was</p> <p>8 working and avoided penalty points."</p> <p>9 He goes on to give an example of that in the</p> <p>10 paragraph. What do you say about that, Mr Petherick?</p> <p>11 A. Well, I was certainly not aware of any such practice.</p> <p>12 Q. But if Reverend Ward is being accurate, that's a bit</p> <p>13 troubling, isn't it?</p> <p>14 A. If he is being accurate, yes.</p> <p>15 Q. Well, do you have any reason to think that he's told</p> <p>16 lies in a witness statement?</p> <p>17 A. I would hope not, no.</p> <p>18 Q. We would all hope not, but do you have any reason --</p> <p>19 A. No.</p> <p>20 Q. When he gave evidence, and we can look at what he said.</p> <p>21 You have seen some of these transcripts, I assume,</p> <p>22 Mr Petherick?</p> <p>23 A. I have. I wouldn't say I've seen them in huge detail.</p> <p>24 Q. No, no, of course not. <INQ000101> at page 38, and if</p> <p>25 we look at the top left, he was being asked about</p> <p style="text-align: center;">Page 105</p> | <p>1 A. I can't speak for that. All I can say is that my</p> <p>2 expectation was very clear and very precise.</p> <p>3 Q. Can we look, please, at schedule G. If we can put up</p> <p>4 <HOM000921>, please. Are you familiar with the terms of</p> <p>5 the contract, or were you?</p> <p>6 A. I was. I won't say that I still am.</p> <p>7 Q. Let's go to the next page, please, page 2. This is --</p> <p>8 at the top, the heading under the schedule is</p> <p>9 "Performance evaluation". Then if we scroll down, we</p> <p>10 will see a series of performance measures, and in the</p> <p>11 right-hand column, "Performance points per day", and</p> <p>12 under (iii) we have "Untoward events" and at (c),</p> <p>13 "Self-harm resulting in injury" and the points to be</p> <p>14 awarded in self-harm resulting in injury, 400.</p> <p>15 If we move on then to page 5, because I want to take</p> <p>16 you to the definition of an untoward event. In the</p> <p>17 incidents of self-harm resulting in injury we see under</p> <p>18 (iii)(c):</p> <p>19 "Any known incident of deliberate self-harm</p> <p>20 resulting in physical injury requiring any form of</p> <p>21 healthcare intervention and involves any failure to</p> <p>22 follow laid-down procedures for the safety of detainees</p> <p>23 as set out in schedule D."</p> <p>24 So it comes to this, and you dealt with this in your</p> <p>25 witness statement, that an act of self-harm alone did</p> <p style="text-align: center;">Page 107</p> |
| <p>1 schedule G of the contract, and at line 7 on page 149 of</p> <p>2 the transcript:</p> <p>3 "Abuse of detained persons ..."</p> <p>4 This is a question:</p> <p>5 "... was not a specific failure within schedule G</p> <p>6 that attracted penalty points, but were there penalty</p> <p>7 points awarded if there was a substantiated complaint</p> <p>8 against a member of staff."</p> <p>9 And he says?</p> <p>10 "Answer: Yes, penalty points would be awarded</p> <p>11 against a substantiated complaint and, therefore, there</p> <p>12 was a great effort not to substantiate complaints."</p> <p>13 What do you think about that?</p> <p>14 A. Well, again, I go back to what I've said in my statement</p> <p>15 and what I've said earlier, that my expectation is that</p> <p>16 people report accurately, investigate accurately, and so</p> <p>17 forth.</p> <p>18 Q. That's your expectation when you were MD. How confident</p> <p>19 can you be that that expectation filtered down to the</p> <p>20 people who were doing the reporting?</p> <p>21 A. Well, I would expect the directors, be it at Brook House</p> <p>22 or any other establishment, to reflect that downwards.</p> <p>23 Q. In the end, if Nathan Ward was being accurate and honest</p> <p>24 here, it looks like that message wasn't going where it</p> <p>25 ought to have gone?</p> <p style="text-align: center;">Page 106</p> | <p>1 not trigger an award of penalty points. First of all,</p> <p>2 it required physical injury resulting from the act?</p> <p>3 A. Correct.</p> <p>4 Q. But, presumably, that could be any physical injury?</p> <p>5 A. Yes, from --</p> <p>6 Q. A scratch?</p> <p>7 A. -- a scratch upwards, yes.</p> <p>8 Q. And, second, involved any failure to follow laid-down</p> <p>9 procedures for the safety of detainees as set out in</p> <p>10 schedule D?</p> <p>11 A. Mmm-hmm.</p> <p>12 Q. If we look at schedule D, please -- we will come back to</p> <p>13 schedule G -- which is <HOM000798>, and if we can just</p> <p>14 scroll down a page or two, first of all, "Operational</p> <p>15 specifications". Can we scroll down again?</p> <p>16 "Definitions". That's part 2. And again. And again.</p> <p>17 Here we find part 3, "Table of contents". There are, on</p> <p>18 the page we are looking at, eight sections, including</p> <p>19 "Operations", "Maintenance of security and safety",</p> <p>20 "Admissions and discharge", section 4 isn't used,</p> <p>21 "Escorting", "Healthcare", "Catering", "Welfare and</p> <p>22 regime". If we can scroll down to the top of the page,</p> <p>23 next page, "Religion and race relations",</p> <p>24 "Communication", "Requests and complaints". Section 12,</p> <p>25 "Use of force, removal from association and temporary</p> <p style="text-align: center;">Page 108</p> |

27 (Pages 105 to 108)

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| <p>1 confinement", "Health and safety arrangements",</p> <p>2 "Provision for detainees at risk" -- that's section 14.</p> <p>3 "Contingency planning arrangements", "Fire prevention</p> <p>4 measures", "Establishment cleaning", "Border and</p> <p>5 immigration manager and Independent Monitoring Board",</p> <p>6 "Staffing", and then I think section 20 is the last --</p> <p>7 no, it is not the last, "Personnel", "IT systems", and</p> <p>8 "Audit". 22 sections in all. So we have two pages of</p> <p>9 contents. Schedule D runs to 226 pages. Let me give</p> <p>10 you one example of one of the sections within</p> <p>11 schedule D.</p> <p>12 Can we go to page 147, please. This is "Provision</p> <p>13 for detainees at risk":</p> <p>14 "The contractor shall maintain order, control and</p> <p>15 discipline and a safe environment in the removal centre.</p> <p>16 Staff will identify and provide care and support to</p> <p>17 those detainees at risk of suicide or self-harm."</p> <p>18 Then:</p> <p>19 "The contractor shall:</p> <p>20 "Minimise the risk of a detainee harming himself.</p> <p>21 As a minimum, the contractor shall ensure that:</p> <p>22 "... (ACDT) training is provided for all staff ...</p> <p>23 "Detainees at risk are identified.</p> <p>24 "There is an ACDT committee that will meet as</p> <p>25 required or at least monthly."</p> <p style="text-align: center;">Page 109</p> | <p>1 Q. Then the next page:</p> <p>2 "Operate and manage an anti-self-harm strategy."</p> <p>3 Did you at Brook House?</p> <p>4 A. There was a self-harm strategy at all of</p> <p>5 the establishments.</p> <p>6 Q. "Operate and manage an anti-bullying strategy that</p> <p>7 provides support to victims and requires bullies to</p> <p>8 address their antisocial behaviour."</p> <p>9 What was the strategy that required bullies to</p> <p>10 address their antisocial behaviour, do you know?</p> <p>11 A. Well, it would be interaction with the bullies, talking</p> <p>12 to them, monitoring them. Easier, I have to say, in</p> <p>13 prisons than in detention centres.</p> <p>14 Q. Who did it at Brook House?</p> <p>15 A. Well, my expectation would be one of the senior</p> <p>16 management team.</p> <p>17 Q. I know that's your expectation, but who did it?</p> <p>18 A. I can't say here and now.</p> <p>19 Q. Let's just have a look at the next page, in case there</p> <p>20 is any more to this:</p> <p>21 "Identify those detainees with special needs and</p> <p>22 then risk assess them on a regular basis and ensure that</p> <p>23 any precautionary arrangements are made to minimise the</p> <p>24 risk to the detainee, other detainees and staff."</p> <p>25 Was that done?</p> <p style="text-align: center;">Page 111</p> |
| <p>1 Was there an ACDT committee?</p> <p>2 A. The honest answer is, I can't say definitively. I would</p> <p>3 expect there to be, yes.</p> <p>4 Q. I don't think we have ever heard of one, you see,</p> <p>5 Mr Petherick?</p> <p>6 A. I can't respond to that.</p> <p>7 Q. So if that is what the contract required, and there</p> <p>8 wasn't one, then that was presumably in breach of that</p> <p>9 part of schedule D?</p> <p>10 A. Yes, logically.</p> <p>11 Q. "Measures are established which ensure active engagement</p> <p>12 with detainees rather than passive monitoring."</p> <p>13 What does that mean?</p> <p>14 A. Well, my expectation is that there is interaction</p> <p>15 between our staff and the people that they are caring</p> <p>16 for. That becomes even more important when someone is</p> <p>17 on an ACDT or an ACCT, a plan in prisons.</p> <p>18 Q. The next bullet point:</p> <p>19 "Emergency first aid kits containing specified</p> <p>20 equipment are accessible and appropriately maintained.</p> <p>21 "Links with the Samaritans are developed."</p> <p>22 Were links with the Samaritans developed?</p> <p>23 A. That's my understanding, yes.</p> <p>24 Q. At Brook House?</p> <p>25 A. That's my understanding.</p> <p style="text-align: center;">Page 110</p> | <p>1 A. My expectation is, it would be.</p> <p>2 Q. "Ensure that there are arrangements in place to care for</p> <p>3 the needs of others in the removal centre affected by</p> <p>4 suicide or self-harm."</p> <p>5 Which would include roommates of somebody who had</p> <p>6 attempted --</p> <p>7 A. Roommates, it would include other detainees, it would</p> <p>8 include staff.</p> <p>9 Q. Exactly. Were there arrangements in place?</p> <p>10 A. There was a care team.</p> <p>11 Q. There was a ...?</p> <p>12 A. A care team.</p> <p>13 Q. Who was that?</p> <p>14 A. Oh, gosh, again, at this distance, I can't give you</p> <p>15 definitive names, but it would normally include</p> <p>16 a chaplain and some other people.</p> <p>17 Q. Do you agree that, in order for G4S to be penalty</p> <p>18 pointed for self-harm resulting in injury, the criteria,</p> <p>19 which included physical injury resulting from the act,</p> <p>20 and involving any failure to follow laid-down procedures</p> <p>21 for the safety of detainees, as set out in this</p> <p>22 schedule, was a high bar?</p> <p>23 A. It would have been a high bar, yes.</p> <p>24 Q. So when, for example, we see self-harm resulting in</p> <p>25 injury, and we have got quite a few examples of those,</p> <p style="text-align: center;">Page 112</p> |

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| <p>1 as you would expect. In order to save time, I'm not</p> <p>2 going to show them to you, Mr Petherick, unless you wish</p> <p>3 me to do so, but we have, for example, examples of D1527</p> <p>4 on 25 April, who tied a ligature to his neck, and ended</p> <p>5 up with some injuries; and we have another detainee</p> <p>6 within our relevant period, D1914, on 27 May -- forgive</p> <p>7 me, on 5 July, who had injured himself quite severely,</p> <p>8 resulting in him going to hospital, and he was put on</p> <p>9 ACDT.</p> <p>10 So we have -- those are but two examples of</p> <p>11 self-harm resulting in, in some instances, quite serious</p> <p>12 injury.</p> <p>13 When there were such incidents, who sat down and</p> <p>14 went through 226 pages of schedule D, just to confirm</p> <p>15 that there was no failure to follow laid-down procedures</p> <p>16 for the safety of detainees?</p> <p>17 A. I doubt whether anybody sat down and went through</p> <p>18 250 pages. My expectation is that the establishment</p> <p>19 management team, at the right level, and the Home Office</p> <p>20 came to a view on that.</p> <p>21 Q. Where would we see that recorded?</p> <p>22 A. You'd have to ask them.</p> <p>23 Q. Well, I'm asking you.</p> <p>24 A. Well, I don't know.</p> <p>25 Q. Why don't you know?</p> <p style="text-align: center;">Page 113</p> | <p>1 people went to 250 pages.</p> <p>2 Q. 226.</p> <p>3 A. Sorry, my apologies.</p> <p>4 Q. Well, whether anybody ever went back to schedule D at</p> <p>5 all is another matter entirely. But they ought to have</p> <p>6 done, or at least to have satisfied themselves that, as</p> <p>7 you say, any part of the lead-up to an incident or any</p> <p>8 part of the causation of the incident was itself</p> <p>9 a failure in procedure?</p> <p>10 A. I think, also, we should understand that Moore Stephens</p> <p>11 conducted an audit of the incident reporting and, as</p> <p>12 I recall, didn't advance any of those concerns. I could</p> <p>13 be wrong in that, but that's my recollection.</p> <p>14 Q. You're right. Except, if you want to look at the NAO</p> <p>15 report, which is <INQ000010>, at page 35 -- it is not</p> <p>16 10. It is 11. <INQ000011>. Can we go to page 35,</p> <p>17 where I hope we will find figure 14. If we just expand</p> <p>18 this and go to the top:</p> <p>19 "Findings of March 2018 financial review by</p> <p>20 Moore Stephens."</p> <p>21 This is what you are referring to?</p> <p>22 A. Yes.</p> <p>23 Q. If we look again to penalties, and I think this is what</p> <p>24 you have in mind:</p> <p>25 "The review did not identify any material errors in</p> <p style="text-align: center;">Page 115</p> |
| <p>1 A. Because that is my expectation. Did I look at every</p> <p>2 case of self-harm across my estate? No, I didn't. Nor</p> <p>3 would I be expected to, to be quite honest.</p> <p>4 Q. My question, really, is, Mr Petherick, how does anybody,</p> <p>5 however it was done, decide that self-harm resulting in</p> <p>6 injury results in 400 penalty points without</p> <p>7 understanding what laid-down procedure they had to be in</p> <p>8 breach of in order for the penalty point to be awarded?</p> <p>9 A. I think, to be quite honest, you'd have to ask the</p> <p>10 people who were having that conversation.</p> <p>11 Q. Should I be asking Ben Saunders, for example?</p> <p>12 A. As the director of the establishment, I would expect</p> <p>13 that.</p> <p>14 Q. But, as far as you're concerned, you can't help?</p> <p>15 A. Not on the finite detail of the individual</p> <p>16 conversations, no, I can't.</p> <p>17 Q. But whoever was doing it had to look at all of the facts</p> <p>18 of each self-harm incident, consider if it resulted in</p> <p>19 any physical injury, and at the same time, and more</p> <p>20 complicatedly, consider whether it involved any failure</p> <p>21 to follow laid-down procedures for the safety of</p> <p>22 detainees as set out in schedule D?</p> <p>23 A. As per the contract, yes. But, in reality, it would be</p> <p>24 about what was the specific event and the immediate</p> <p>25 causation of that event, and so I doubt very much that</p> <p style="text-align: center;">Page 114</p> | <p>1 the handling of penalties for underperformance, but</p> <p>2 noted two issues:</p> <p>3 "A lack of availability of evidence on why potential</p> <p>4 breaches recorded in the Home Office issues log were not</p> <p>5 reported in the monthly performance report."</p> <p>6 So there was an issue about non-reporting:</p> <p>7 "... and</p> <p>8 "A lack of information on incident reports and</p> <p>9 therefore potential performance breaches and financial</p> <p>10 penalties. [Albeit the] second point did not relate to</p> <p>11 Brook House."</p> <p>12 So it wasn't an entirely clean bill of health, and</p> <p>13 I can't tell you, and I'm not sure whether you know,</p> <p>14 Mr Petherick, what it was they actually relied upon or</p> <p>15 examined. But the fact remains that there were clearly</p> <p>16 incidents of self-harm resulting in physical injury,</p> <p>17 none of which, you will accept, resulted in any points</p> <p>18 being awarded during the relevant period. Do you</p> <p>19 understand, or do you appreciate, that during the</p> <p>20 relevant period we are dealing with, there were 60 acts</p> <p>21 of self-harm in that five-month period?</p> <p>22 A. Mmm-hmm.</p> <p>23 Q. Did you appreciate that?</p> <p>24 A. Yes.</p> <p>25 Q. Let me just put up on screen just one example of</p> <p style="text-align: center;">Page 116</p> |

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| <p>1 a monthly performance report, so everyone can see what</p> <p>2 I'm talking about and what you're talking about,</p> <p>3 <CJS004580>. This is a removal centre monthly report,</p> <p>4 and we have all of these now for April, May, June, July</p> <p>5 and August. Chair, I would like to have adduced in</p> <p>6 evidence, if it is not clear -- we don't need to put</p> <p>7 them up, Zaynab, but this in full, <CJS004579>,</p> <p>8 <CJS004586>, <CJS004581> and <CJS004585>. They are</p> <p>9 respectively June through to August, the same type of</p> <p>10 document. This one we have on screen is for the month</p> <p>11 ending April 2017, and we can see it sets out a number</p> <p>12 of statistics, but in the second table on the page, this</p> <p>13 really deals with all the points, doesn't it,</p> <p>14 Mr Petherick?</p> <p>15 A. It does.</p> <p>16 Q. Have you ever seen one of these?</p> <p>17 A. I have seen them. I didn't get them automatically.</p> <p>18 Q. No, you have said. If we go down to the next page,</p> <p>19 information including -- we can see the 600. That's in</p> <p>20 red. That indicates points awarded for a particular</p> <p>21 failure. And the "N" on the right-hand side, if we can</p> <p>22 just go back to the first page, Zaynab, "Mitigation</p> <p>23 accepted". So what would happen is, G4S self-reported</p> <p>24 a failure. That would attract a certain number of</p> <p>25 penalty points. And they would go cap in hand to the</p> <p style="text-align: center;">Page 117</p> | <p>1 (intervention by resuscitation was not required for any</p> <p>2 of these incidents).</p> <p>3 "Requiring offsite medical treatment: 1.</p> <p>4 "Treated on site: 2.</p> <p>5 "Refused medical treatment: 3."</p> <p>6 It says an F123, report of injury to detainee forms</p> <p>7 not received: 9". I think that should be an F213:</p> <p>8 "Report of injury to detainee forms not received."</p> <p>9 So here we have the IMB's report of self-harm</p> <p>10 certainly resulting in physical injury, by the look of</p> <p>11 it, in respect of three, four, five, maybe six of</p> <p>12 the individuals, albeit two refused medical treatment</p> <p>13 and healthcare provision, as I recall it, under</p> <p>14 schedule D, was also required, healthcare intervention.</p> <p>15 Do you think there was a flaw, an omission, in the</p> <p>16 contract which made it too difficult for G4S to, as it</p> <p>17 were, have to suffer financial penalty where detainees</p> <p>18 self-harmed, suffering physical injury? Did you think</p> <p>19 that was a flaw, that it was too low down, as it were,</p> <p>20 the pecking order of failures for which G4S would be</p> <p>21 penalised when it was made so difficult for a penalty to</p> <p>22 be imposed?</p> <p>23 A. You see, I don't see that it is so difficult because my</p> <p>24 expectation is that the operator and the customer, the</p> <p>25 Home Office, the representatives of such, would come</p> <p style="text-align: center;">Page 119</p> |
| <p>1 Home Office and say, "Well, this is our excuse. This is</p> <p>2 our mitigation"?</p> <p>3 A. I don't accept the "cap in hand" comment. There would</p> <p>4 be a discussion.</p> <p>5 Q. A discussion, all right. But the idea was to reduce</p> <p>6 financial penalties?</p> <p>7 A. There was a discussion about whether the penalty was</p> <p>8 correct or incorrect and, yes.</p> <p>9 Q. If we go to the next page, under 3, "Untoward events",</p> <p>10 you will remember we saw that terminology in schedule G</p> <p>11 in the contract, and if we go to the next page, at the</p> <p>12 top, (c), "Self-harm resulting in injury". I'm tempted</p> <p>13 to say "nil points", but it is no points as far as this</p> <p>14 is concerned. The same applies for every one of</p> <p>15 the performance reports, Mr Petherick, that we have for</p> <p>16 the whole of the relevant period, as you have accepted.</p> <p>17 Can we look at another document, <IMB000047>. This</p> <p>18 is a combined report to the Independent Monitoring</p> <p>19 Board. It's dated July 2017, for Brook House. Did you</p> <p>20 see any of these documents?</p> <p>21 A. No, not automatically.</p> <p>22 Q. It provides a number of data in relation to Brook House</p> <p>23 for July 2017. If we go to the next page, please, under</p> <p>24 1.4:</p> <p>25 "Number of acts of self-harm: 14 by 11 individuals</p> <p style="text-align: center;">Page 118</p> | <p>1 together, would discuss, and where we were at fault,</p> <p>2 I would expect to pay those penalty points, because</p> <p>3 that's where you take the learning from.</p> <p>4 I think that's actually very important. I think the</p> <p>5 whole area of assigning targets to areas of self-harm</p> <p>6 can be fraught with all kinds of difficulties and</p> <p>7 dangers. I think that's -- the fact is, self-harm is</p> <p>8 a hugely important issue. You know that, I know that.</p> <p>9 And anyone who suggests otherwise, I have no patience</p> <p>10 with. And this, again, was one of the causal factors</p> <p>11 behind Peter Neden setting up the forum whereby we could</p> <p>12 learn from incidents of self-harm across the company</p> <p>13 internationally.</p> <p>14 Q. But don't you agree, when we have these kinds of</p> <p>15 figures, and this is just for July and, as I told you,</p> <p>16 there were 60 incidents of self-harm over a five-month</p> <p>17 period during the relevant period for this inquiry, in</p> <p>18 order for G4S to be penalised for such failures, as</p> <p>19 I suggested to you earlier, the bar was set far too</p> <p>20 high, wasn't it? In other words, from a commercial</p> <p>21 point of view, from a contractual point of view,</p> <p>22 self-harm by a detainee just wasn't important enough?</p> <p>23 A. Oh, no, let me really come back very strongly there.</p> <p>24 Because I know, from having to go to cells in prisons</p> <p>25 where a tragedy has happened, the impact on myself and</p> <p style="text-align: center;">Page 120</p> |

30 (Pages 117 to 120)

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| <p>1 other people and going out as a governor, as an area 2 manager, to inform the next of kin about a tragedy 3 that's happened, no-one can ever say to me that I or 4 anyone I would expect to treat it lightly or anything 5 else. It was very important and that's reinforced by 6 Peter Neden's introduction of that forum. So, please, 7 no-one should suggest to me, ever, that I treated 8 self-harm as being a factor that wasn't terribly 9 important. I refute that entirely.</p> <p>10 Q. I'm talking here, Mr Petherick, about the contract. The 11 contract didn't treat it importantly enough?</p> <p>12 A. The contract has to be operated by individuals, and 13 it's, to a degree, up to the individuals and the 14 discussions to test against the contract whether the 15 failure happened or didn't happen, as per the contract. 16 So ...</p> <p>17 Q. Yes?</p> <p>18 A. The penalties are there. I can't say why they weren't 19 operated because I wasn't party to those discussions.</p> <p>20 Q. Coming back to the issue I raised with you a few minutes 21 ago about the terms of schedule G in reliance on 22 failures under schedule D, if the centre director wasn't 23 going through the schedule to determine if there'd been 24 any failures in the lead-up to an incident of self-harm, 25 and if the Home Office wasn't doing it, then it wasn't</p> <p style="text-align: center;">Page 121</p> | <p>1 A. Well, that's for the discussions, as I say, that the two 2 parties at site would have had. I can't speak for those 3 discussions.</p> <p>4 Q. Let's go back to schedule G, please. <HOM000921> at 5 page 9. Perhaps at the bottom of page 7, or 8 I think 6 it may be. It should be 4.4 at the bottom. It is the 7 next page.</p> <p>8 We have under the heading "Performance" -- no, it is 9 my fault. It is the previous page, sorry. It should be 10 page 8. "3. Significant performance failures". There 11 is a blurb about that: 12 "Without prejudice to the foregoing paragraphs, 13 deductions shall also be made from ..." 14 We can read the rest: 15 "... for significant performance failures which are 16 listed overleaf." 17 If we go to the next page, in that table we have: 18 "Self-harm resulting in death (being any known 19 incident of deliberate self-harm resulting in death 20 which involves any failure to follow laid-down 21 procedures): £10,000 per incident." 22 If we go to the next-but-one box: 23 "In the event of a detainee escaping from lawful 24 custody: 25 "(a) from the removal centre and being no longer</p> <p style="text-align: center;">Page 123</p> |
| <p>1 being done properly, was it?</p> <p>2 A. I can't speak for them. I think it would be improper to 3 speak for them. Because I wasn't party to those 4 conversations.</p> <p>5 Q. I mean, do you think the Home Office would realistically 6 have scrutinised the information or have reconciled it 7 against the monthly performance management reports?</p> <p>8 A. I would expect that, yes.</p> <p>9 Q. You would expect it. Do you think the inquiry can be 10 confident that an incident of self-harm was not properly 11 reported for the purposes of the contract and triggered 12 a points award when it ought to have been?</p> <p>13 A. Well, I think my reading of this is that the incidents 14 of self-harm were reported. As I've just said, I can't 15 speak for others who were involved in the subsequent 16 discussions. The fact is that the document on the 17 screen is actually a joint G4S/Home Office document to 18 the IMB meeting.</p> <p>19 Q. So you're saying they were alive to these incidents of 20 self-harm?</p> <p>21 A. Well, I take it from the document being a joint 22 document, yes.</p> <p>23 Q. They were alive to incidents of self-harm and if they 24 didn't regard it as a contract breach, then there's not 25 an issue?</p> <p style="text-align: center;">Page 122</p> | <p>1 within the custody of the contractor; or 2 "(b) whilst being escorted outside the removal 3 centre and being no longer in the custody of 4 the subcontractor (an 'escort escape') for any period 5 exceeding 15 minutes or less than 15 minutes if 6 a further offence is committed ... the contractor shall 7 be liable to make a payment to the authority of £30,000 8 per detainee incident in respect of a detention escape 9 or £10,000 per incident in respect of an escort escape, 10 in each case regardless of the number of detainees who 11 have escaped."</p> <p>12 Do you think it's got its priorities wrong?</p> <p>13 A. I think that's a question that should be directed to the 14 Home Office who set the contract.</p> <p>15 Q. Did it ever strike you, when you were dealing with this 16 contract, Mr Petherick, because you mentioned an escape 17 on day one of Mr Hanford's tenure.</p> <p>18 A. Mmm-hmm.</p> <p>19 Q. I assume that cost the company £30,000?</p> <p>20 A. It did.</p> <p>21 Q. So did it ever occur to you, when you were in post, that 22 the priorities are wrong in this table?</p> <p>23 A. As a human being, I would say yes.</p> <p>24 Q. As the managing director of G4S custodial Detention 25 Services?</p> <p style="text-align: center;">Page 124</p> |

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| <p>1 A. I am still a human being and I would still say yes.</p> <p>2 Q. It is you who makes the distinction. I'm asking you in</p> <p>3 your erstwhile position as managing director of</p> <p>4 a company, not just as a human being, Mr Petherick. Was</p> <p>5 that ever raised?</p> <p>6 A. No.</p> <p>7 Q. Why do you think?</p> <p>8 A. Probably, once we were in operation -- I mean, it may</p> <p>9 have been raised at the time -- I doubt very much</p> <p>10 whether it was -- before the contract was signed. It</p> <p>11 simply didn't come into the conversation.</p> <p>12 Q. It almost lends itself, don't you think, to the</p> <p>13 suggestion that the contract gives the appearance of</p> <p>14 the welfare of detainees being of less contractual</p> <p>15 importance than keeping them locked up?</p> <p>16 A. No, I don't necessarily agree with that.</p> <p>17 Q. "Not necessarily"?</p> <p>18 A. No.</p> <p>19 Q. All right. The optics aren't very good, though, are</p> <p>20 they?</p> <p>21 A. No, I would accept that.</p> <p>22 Q. Now let me turn away from the contract, please,</p> <p>23 Mr Petherick, and move on to other matters.</p> <p>24 Ben Saunders. He was appointed as the centre director.</p> <p>25 A. Yes.</p> <p style="text-align: right;">Page 125</p> | <p>1 Q. And around that time, you despatch him back to Medway</p> <p>2 from Brook House?</p> <p>3 A. I think it's wrong to say I despatched him.</p> <p>4 Q. Who did?</p> <p>5 A. There was a request from the managing director of the</p> <p>6 G4S Children's Services business stream after he had had</p> <p>7 discussions with, I assume, the Youth Custody Service in</p> <p>8 MOJ about needing an interregnum director at Medway, and</p> <p>9 I was asked to broker that request with the Home Office.</p> <p>10 Q. So he was sent back for, what, about six months or so?</p> <p>11 A. About six months.</p> <p>12 Q. And then he returned to Brook House in the summer, early</p> <p>13 summer, of 2016?</p> <p>14 A. Yes.</p> <p>15 Q. He said in his witness statement he was sent back to</p> <p>16 Medway to provide leadership and stability?</p> <p>17 A. That's correct.</p> <p>18 Q. Does that sound about right to you, as you understood</p> <p>19 it? Let's rewind all the way back, then, to 2012 with</p> <p>20 all of that in mind. He told Verita that Brook House</p> <p>21 was a step up for him.</p> <p>22 A. Mmm-hmm.</p> <p>23 Q. Does that sound about right to you?</p> <p>24 A. Yes, it does.</p> <p>25 Q. Why would that sound right to you? Why would it be</p> <p style="text-align: right;">Page 127</p> |
| <p>1 Q. About 2012?</p> <p>2 A. Yes, I'm sure that's right.</p> <p>3 Q. This is my understanding of his career: he was a social</p> <p>4 worker --</p> <p>5 A. Mmm-hmm.</p> <p>6 Q. -- by training. He joined Medway STC in 2002, worked</p> <p>7 there until 2012, when he became centre director of</p> <p>8 Brook House?</p> <p>9 A. I think he was centre director at Medway in between. He</p> <p>10 didn't join as centre director at Medway, he became</p> <p>11 centre director, I think.</p> <p>12 Q. I said centre director at Brook House.</p> <p>13 A. But he was also at Medway as centre director.</p> <p>14 Q. Let's rewind. He joined Medway in 2002?</p> <p>15 A. Mmm-hmm.</p> <p>16 Q. He joined Brook House in 2012. At some point, he was</p> <p>17 centre director at Medway or was he --</p> <p>18 A. That's my understanding, yes.</p> <p>19 Q. But then he --</p> <p>20 A. For about five years, as I recall.</p> <p>21 Q. He joined Brook House as centre director in 2012?</p> <p>22 A. Mmm-hmm.</p> <p>23 Q. On 11 January 2016, the BBC Panorama programme exposes</p> <p>24 the problems at Medway?</p> <p>25 A. Mmm-hmm.</p> <p style="text-align: right;">Page 126</p> | <p>1 a step up for him?</p> <p>2 A. It was a larger centre, it was a different operating</p> <p>3 environment. But primarily, I think, the larger centre</p> <p>4 with the greater accountability.</p> <p>5 Q. Well, he had come from a secure training centre. Why</p> <p>6 was there greater accountability?</p> <p>7 A. Through the sheer size of the centre.</p> <p>8 Q. He said, and if needs be, again, this can go up on</p> <p>9 screen, but in his interview to Verita, he said:</p> <p>10 "I had become a very target-focused,</p> <p>11 contractually-compliant-focused, manager and leader,</p> <p>12 and, actually, that is not the person I am. I am very</p> <p>13 people-focused and I found that refreshing and</p> <p>14 I reflected on that and incorporated some of that change</p> <p>15 into our discussions and conversations, and how I would</p> <p>16 behave in my work."</p> <p>17 He was asked a little later:</p> <p>18 "Ms Lampard: Therefore, your evidence is quite</p> <p>19 clearly that the focus seemed to be on targets and</p> <p>20 profit. People talked about people, but in reality the</p> <p>21 focus was on profit?"</p> <p>22 He said:</p> <p>23 "Yes, I wouldn't say that necessarily of Jerry, but</p> <p>24 it felt like that above, and certainly, there was</p> <p>25 pressure around delivery, absolutely."</p> <p style="text-align: right;">Page 128</p> |

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| <p>1 Then he was asked:</p> <p>2 "Question: However, you felt through them, did you,</p> <p>3 this sort of pressure for delivery?</p> <p>4 "Answer: No, not just that. There was pressure for</p> <p>5 deliver from Jerry. It's right -- you should deliver."</p> <p>6 So those were the pressures he talked about. Do you</p> <p>7 accept those pressures that he felt?</p> <p>8 A. Yes.</p> <p>9 Q. So delivery, that it was target focused, profit element?</p> <p>10 A. I don't necessarily accept the profit element intonation</p> <p>11 that you give. The fact is that we were target-driven,</p> <p>12 I'm target-driven, or I was when I was employed, and we</p> <p>13 had requirements on us to deliver. I see that as quite</p> <p>14 proper. I have seen that, as I have said previously</p> <p>15 today, in both my public sector days and my private</p> <p>16 sector days. I don't see any difference in that. As</p> <p>17 a governor, I had targets to deliver. As an area</p> <p>18 manager, I did.</p> <p>19 Q. There is nothing wrong with it, Mr Petherick, as long as</p> <p>20 it doesn't interfere with the overarching welfare of</p> <p>21 those that you have to accommodate?</p> <p>22 A. I agree, and I don't believe that they did, because, you</p> <p>23 know, I see that and I believe the vast majority of</p> <p>24 the people I worked with saw that as well. This is</p> <p>25 a vocation as much as anything else.</p> <p style="text-align: center;">Page 129</p> | <p>1 Q. "Ben coming from Children's Services, Duncan coming from</p> <p>2 a role in the Home Office immigration. It was</p> <p>3 a close-run thing. Ben had it on merit. I thought</p> <p>4 I was getting an experienced director, because he was</p> <p>5 director of Medway Secure Training Centre. I was wrong</p> <p>6 in that. What I had was an experienced enactor of his</p> <p>7 then managing director's instructions ..."</p> <p>8 You were the MD:</p> <p>9 "... managing director and chief operating officer."</p> <p>10 Were you also the COO?</p> <p>11 A. No. Let me be clear. His then MD's instructions, that</p> <p>12 was the MD of Children's Services, because Medway was in</p> <p>13 a separate business division to mine.</p> <p>14 Q. So you were talking about Medway, his Medway time?</p> <p>15 A. Yes.</p> <p>16 Q. "Let's put it this way, my philosophy is that it is</p> <p>17 a director's job to manage the centre. In the</p> <p>18 Children's Services world at that time that wasn't the</p> <p>19 philosophy, and so I didn't have what I was quite</p> <p>20 anticipating. I think that's life."</p> <p>21 Just going back:</p> <p>22 "It was a close-run thing. Ben had it on merit.</p> <p>23 I thought I was getting an experienced director, because</p> <p>24 he was director of Medway ... I was wrong in that."</p> <p>25 Were you telling Verita that you made a mistake in</p> <p style="text-align: center;">Page 131</p> |
| <p>1 Q. Well, maybe for you.</p> <p>2 A. Absolutely for me.</p> <p>3 Q. But you think for everybody?</p> <p>4 A. Oh, again, I would be naive to say that, but for me,</p> <p>5 absolutely and clearly.</p> <p>6 Q. Can we look at what you said in your Verita interview,</p> <p>7 <VER000263> at page 19. At 346, you're talking about</p> <p>8 Michelle Brown --</p> <p>9 A. No, it isn't Michelle Brown.</p> <p>10 Q. No, a different Michelle?</p> <p>11 A. It was actually another lady.</p> <p>12 Q. Which is what you say:</p> <p>13 "We were left with that position. We advertised and</p> <p>14 the competition was narrowed down to two people for the</p> <p>15 in charge because I was going to do the in charge first</p> <p>16 and then trickle down from there for obvious reasons,</p> <p>17 narrowing down to Ben Saunders and Duncan Partridge."</p> <p>18 I think what you're talking about here is the</p> <p>19 decision that was made about who was going to be centre</p> <p>20 director?</p> <p>21 A. Correct. Because to make sure we understand the</p> <p>22 context, my predecessor, who was responsible for</p> <p>23 immigration services, left to join another company.</p> <p>24 Appallingly, he then took the top three people from</p> <p>25 Brook House with him.</p> <p style="text-align: center;">Page 130</p> | <p>1 picking him?</p> <p>2 A. No, I wasn't making that in any way, shape or form.</p> <p>3 I was saying that Ben wasn't as experienced in</p> <p>4 directing, as I would see it, as I thought he would be.</p> <p>5 He had absolutely the right personal qualities, in my</p> <p>6 view, in terms of care for individuals. I learnt,</p> <p>7 through the passage of time -- and this was probably the</p> <p>8 first intimation of that, that the then MD of Children's</p> <p>9 Services was a much more controlling person in his</p> <p>10 estate than I was. My belief is very much that</p> <p>11 directors get paid to direct their establishment, in the</p> <p>12 same way as in the public sector governors get paid to</p> <p>13 govern their establishments.</p> <p>14 Q. So he wasn't the wrong person?</p> <p>15 A. No.</p> <p>16 Q. He was the right person, but just with the wrong</p> <p>17 experience?</p> <p>18 A. He had a different experience to what I had anticipated,</p> <p>19 but he was, of the competition, and it was</p> <p>20 a competition, the person who won out on merit.</p> <p>21 Q. Duncan Partridge, you say, "we thought was someone for</p> <p>22 the future and he didn't get the director's job but we</p> <p>23 did appoint him as deputy director. We had a long</p> <p>24 conversation with him about 'Can you handle this?' ...</p> <p>25 We were satisfied by the assurances but the chemistry</p> <p style="text-align: center;">Page 132</p> |

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| <p>1 was wrong ..."</p> <p>2 That was, what, the chemistry he gave you,</p> <p>3 Duncan Partridge?</p> <p>4 A. Not just him to me, but the chemistry between him and</p> <p>5 Ben. We had two people competing for the role.</p> <p>6 Q. Yes.</p> <p>7 A. We had someone experienced, as I saw it, in managing and</p> <p>8 directing an establishment; we had someone else who had</p> <p>9 experience of the Home Office immigration, which</p> <p>10 I thought was useful, and I thought the combination was</p> <p>11 the correct combination. We tested out, because we were</p> <p>12 aware how people who have an ambition to go for one post</p> <p>13 don't get it and then get the number two post. That can</p> <p>14 be difficult. And so we tested that out as best we</p> <p>15 could. We got assurances. I'm not sure that the</p> <p>16 assurances were as deeply meant as they were said.</p> <p>17 Q. If we run on to the next page, and you say:</p> <p>18 "... the chemistry was wrong, and Duncan, I believe,</p> <p>19 went out to trip Ben up. Ben was having pressure from</p> <p>20 me because of a number of things. He was having</p> <p>21 pressure from Duncan. It ended in tears. Duncan left</p> <p>22 ... That undoubtedly, caused some instability.</p> <p>23 "My take on Ben, you want it honestly, so I will</p> <p>24 give you it honestly. He is a really good schmoozer of</p> <p>25 people. He is a nice guy. I have a lot of time for</p> <p style="text-align: center;">Page 133</p> | <p>1 Mr Petherick, as a centre director, or did he</p> <p>2 disappoint?</p> <p>3 A. No, in many ways, he met them. He met them certainly</p> <p>4 for, as I saw it, decency. He -- in my experience, with</p> <p>5 the director and deputy director, governor/deputy</p> <p>6 governor in public sector, you look for a balance. You</p> <p>7 look for someone who is good at stakeholder management</p> <p>8 and you look for someone who is really leading the</p> <p>9 tactical day-by-day stuff. Ben's particular expertise</p> <p>10 is that of stakeholder management, and I would expect</p> <p>11 then the deputy to be dealing with the more tactical,</p> <p>12 and that's generally how it works.</p> <p>13 Q. You know what, that's exactly what he says, that he</p> <p>14 looked outwards?</p> <p>15 A. Yes.</p> <p>16 Q. He was more busy with the external stakeholders than</p> <p>17 looking inside. Do you think that's what you really</p> <p>18 needed in a centre director, somebody who perhaps was</p> <p>19 more interested in keeping the Home Office happy than</p> <p>20 the other external stakeholders?</p> <p>21 A. I think you need a balance and I have had that balance</p> <p>22 personally in the past. You do need a balance, as</p> <p>23 a governor, and that's a direct comparison.</p> <p>24 Q. Who provides the balance? He does or other people under</p> <p>25 him?</p> <p style="text-align: center;">Page 135</p> |
| <p>1 Ben. We learnt through time that he always wanted to be</p> <p>2 considered well, felt well by everyone and he would</p> <p>3 actually work in that way. I am afraid every director</p> <p>4 needs a sword. If it is in the scabbard all the time it</p> <p>5 is no good. If it is out all the time it soon gets</p> <p>6 blunt and you need to find the balance. Ben is a very</p> <p>7 good schmoozer, a very good interactor. He did not like</p> <p>8 the confrontation with some of his staff, particularly</p> <p>9 senior managers, and we had a number of complaints and</p> <p>10 grievances from senior staff towards that. People will</p> <p>11 probably say nothing happened, but that is absolutely</p> <p>12 wrong because Ben was challenged in an appropriate way,</p> <p>13 and given guidance, given challenge. People won't</p> <p>14 necessarily have seen that and nor should they."</p> <p>15 What were you saying about swords and scabbards?</p> <p>16 A. I know all too well from my personal experience of</p> <p>17 managing establishments that you need to have a number</p> <p>18 of skills, one of which is knowing when to be very</p> <p>19 forceful, very directive and to challenge people. And</p> <p>20 sometimes people don't like that. So it's my perhaps</p> <p>21 lazy way of saying I needed, and I need, to be able to</p> <p>22 handle some very direct conversations and directions.</p> <p>23 So people can criticise my language, I'm quite happy</p> <p>24 with that, but that's my intent.</p> <p>25 Q. Looking back now, did he meet your expectations,</p> <p style="text-align: center;">Page 134</p> | <p>1 A. I look at it as a team. So the balance -- as director,</p> <p>2 you need to have a balance between stakeholder</p> <p>3 management and being aware of what's going on, but most</p> <p>4 of the tactical management of the establishment would be</p> <p>5 the responsibility of the deputy director.</p> <p>6 Q. Were you aware of the sort of challenges he was subject</p> <p>7 to by other members of the SMT?</p> <p>8 A. I picked up increasingly those challenges.</p> <p>9 Q. I mean, Steve Skitt, who I reminded you earlier joined</p> <p>10 Brook House in 2015, as I remember, to go along and</p> <p>11 himself help with stability --</p> <p>12 A. Indeed.</p> <p>13 Q. -- called it a place where there was -- and this is what</p> <p>14 he told us on Thursday when he gave evidence, that it</p> <p>15 was a long-established grievance culture?</p> <p>16 A. Indeed.</p> <p>17 Q. Why?</p> <p>18 A. Oh. I think a number of factors are relevant there. In</p> <p>19 my experience, smaller establishments tend to be more</p> <p>20 difficult in those terms of relationships. I'm not sure</p> <p>21 why, but that's my experience. I think the fact that</p> <p>22 when my predecessor's MD took out the top three layers</p> <p>23 of management from Brook House when he left, that caused</p> <p>24 an atmosphere which ranged from, "Why wasn't I also</p> <p>25 invited to go?" to people having hopes about fairly</p> <p style="text-align: center;">Page 136</p> |

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| <p>1 accelerated promotion and issues such as that. I think</p> <p>2 there were a number of factors that were involved.</p> <p>3 Q. Steve Skitt told us he hadn't seen anything like it in</p> <p>4 30 years?</p> <p>5 A. Yes.</p> <p>6 Q. And Lee Hanford, who you brought in, I think, in about</p> <p>7 2016 to help sort it all out said he'd not seen anything</p> <p>8 like it in 31 years in the custodial environment.</p> <p>9 A. Mmm-hmm.</p> <p>10 Q. Bit of a concern, isn't it?</p> <p>11 A. Yes, it was, and that's why we reacted to it.</p> <p>12 Q. How did you react to it?</p> <p>13 A. By becoming personally involved with giving advice and</p> <p>14 guidance; by putting in the additional resource of</p> <p>15 Steve Skitt to give some more resource, hopefully to</p> <p>16 give Ben Saunders some support, and to give me another</p> <p>17 set of eyes and ears.</p> <p>18 Q. In order to save time, Mr Petherick, I can't go through</p> <p>19 all of the fine detail of all of the grievances, but you</p> <p>20 will know it involved Duncan Partridge, who left?</p> <p>21 A. Mmm-hmm.</p> <p>22 Q. Nathan Ward, who left?</p> <p>23 A. Mmm-hmm.</p> <p>24 Q. It got to the point where you, yourself, at very short</p> <p>25 notice had to go down to Gatwick --</p> <p style="text-align: center;">Page 137</p> | <p>1 should be adduced in full if it isn't already. Then we</p> <p>2 have the Medway report of course. Were you familiar</p> <p>3 with its terms?</p> <p>4 A. Not in any great depth, because it wasn't in my</p> <p>5 business.</p> <p>6 Q. But it was your business, surely, to understand its</p> <p>7 content and the impact it might have on Brook House, for</p> <p>8 example?</p> <p>9 A. Yes, of course.</p> <p>10 Q. If you read it, and we can go through it, if needs be,</p> <p>11 and it is a report, again, which I'm sure this inquiry</p> <p>12 and the chair is interested in, <INQ000010>. It spoke</p> <p>13 of a culture being based on control and contract</p> <p>14 compliance -- blurred lines. I know this was not your</p> <p>15 baby, as it were, because it was somebody else who was</p> <p>16 running it within the company, but blurred lines of</p> <p>17 accountability, concerns about the organisation,</p> <p>18 supposed to be scrutinising or safeguarding, that</p> <p>19 there'd been a history of similar concerns being raised</p> <p>20 repeatedly in letters from whistleblowers and former</p> <p>21 staff, that use of force had been disproportionate and</p> <p>22 punitive, and that there was a lack of understanding of</p> <p>23 causes and drivers of behavioural problems and too much</p> <p>24 focus on controlling the behaviour of individuals rather</p> <p>25 than on dealing with underlying vulnerabilities.</p> <p style="text-align: center;">Page 139</p> |
| <p>1 A. Mmm-hmm.</p> <p>2 Q. -- and, as it were, knock heads together?</p> <p>3 A. Mmm-hmm.</p> <p>4 Q. You spoke to Ben Saunders on 28 October 2015. You also</p> <p>5 spoke to Duncan Partridge?</p> <p>6 A. Mmm-hmm.</p> <p>7 Q. You talked about, in a note that you wrote, which we</p> <p>8 have, his "clumsy managerial style". Do you remember</p> <p>9 that?</p> <p>10 A. I said, I think, I saw two examples of clumsy handling,</p> <p>11 where he didn't maximise the benefits that he could have</p> <p>12 accrued.</p> <p>13 Q. For the record, that's <VER000103>, which I ask to go in</p> <p>14 in full. And there was something about a hit list he</p> <p>15 had, what, of people he wanted to get rid of?</p> <p>16 A. There was that rumour.</p> <p>17 Q. You didn't believe it?</p> <p>18 A. Well, Ben argued against that.</p> <p>19 Q. But there had been a rumour going around he had some hit</p> <p>20 list?</p> <p>21 A. Mmm-hmm.</p> <p>22 Q. And you quizzed him about that?</p> <p>23 A. Yes, I did.</p> <p>24 Q. In fact, Nathan Ward speaks about it in the witness</p> <p>25 statement to which I referred earlier <DL0000154>, which</p> <p style="text-align: center;">Page 138</p> | <p>1 So, if one reads it, it rather chimes with a number</p> <p>2 of the issues this inquiry is enquiring into; do you</p> <p>3 agree?</p> <p>4 A. Yes.</p> <p>5 Q. Those concerns were shared by Peter Neden, because, in</p> <p>6 the report which was put up by Zaynab a little earlier,</p> <p>7 only because I'd announced one digit out what the actual</p> <p>8 URN was to it, that he is quoted, in the report at</p> <p>9 paragraph 2.17, Peter Neden, saying there was a need to</p> <p>10 encourage a change of culture and for people to be able</p> <p>11 to openly raise their concerns. Did Peter Neden discuss</p> <p>12 with you the Medway report? Was it a topic of</p> <p>13 conversation?</p> <p>14 A. Yes, it was, both on a one-to-one basis but also in</p> <p>15 Peter's MD's meeting, as I recall.</p> <p>16 Q. Did G4S at any level, whether at your level, his level,</p> <p>17 because you say he was your line manager, or at any</p> <p>18 other level, did anybody say, "We need to sit down with</p> <p>19 this report and see if these problems apply elsewhere</p> <p>20 within the institutions we are running"?</p> <p>21 A. My recollection is that -- and I think understandably --</p> <p>22 that would have been left to individual MDs, so, for</p> <p>23 example, to myself. That is my recollection. I'm</p> <p>24 trying to recall, because at one stage the company went</p> <p>25 into a very widespread "Creating conscious leaders"</p> <p style="text-align: center;">Page 140</p> |

35 (Pages 137 to 140)

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| <p>1 exercise with a lot of significant training input to us.</p> <p>2 I think that was at a different period.</p> <p>3 Q. So looking back now, Mr Petherick, can you remember</p> <p>4 whether you or the company at large were caused, by the</p> <p>5 content of the Medway report, to look across at all the</p> <p>6 custodial institutions G4S ran in order to ensure that</p> <p>7 the same problems could not or were not arising in those</p> <p>8 establishments?</p> <p>9 A. I would say that was an ongoing and relatively normal</p> <p>10 part of my work, because you go back to issues such as</p> <p>11 the Milgram Experiments, et cetera, which we learned</p> <p>12 from years ago. And I always have to be aware of</p> <p>13 the risk of that, and I take reassurance from a number</p> <p>14 of features, be it my own visits to establishments when</p> <p>15 I would walk around, be it the inspectorate, the IMB,</p> <p>16 and so forth. I take soundings from a number of</p> <p>17 different inputs.</p> <p>18 Q. Which all leads, really, to the question, how was it, do</p> <p>19 you think, that the kind of behaviour that we witnessed</p> <p>20 on Panorama was missed by those in management?</p> <p>21 A. I wish I could give you a simple answer to that.</p> <p>22 I can't. And I think -- and I do come back to this</p> <p>23 being a particular challenge in all custodial-type</p> <p>24 environments, because some people can be very good at</p> <p>25 hiding such behaviours, and they're abhorrent</p> <p style="text-align: center;">Page 141</p> | <p>1 certain grievances you couldn't deal with?</p> <p>2 A. Indeed.</p> <p>3 Q. You said because you had to deal with the Birmingham</p> <p>4 issue, which was December 2016?</p> <p>5 A. Yes.</p> <p>6 Q. So the same thing, so, for one reason or another, you</p> <p>7 weren't able to make the visits you might otherwise, as</p> <p>8 you put it, ideally visit?</p> <p>9 A. Mmm-hmm.</p> <p>10 Q. But we understand what you say, that if a senior man or</p> <p>11 a senior woman, for that matter, is walking around, DCOs</p> <p>12 and DCMs aren't going to misbehave in front of you under</p> <p>13 your nose, or they shouldn't be?</p> <p>14 A. They shouldn't be.</p> <p>15 Q. The other point I'd like you to consider is, it's not</p> <p>16 just one person hiding this. It's a number of people.</p> <p>17 And it is a number of people in the whole Brook House</p> <p>18 estate. And yet it's still being missed. You must have</p> <p>19 thought about this quite a bit and, "How did we miss</p> <p>20 this? How did we not learn the lessons of Medway? Why</p> <p>21 didn't we look a little more closely?" What's the</p> <p>22 answer to all of that?</p> <p>23 A. I can't give an absolute, coherent answer, because there</p> <p>24 are a number of levels, there are a number of</p> <p>25 organisations, but let's just talk directly about the</p> <p style="text-align: center;">Page 143</p> |
| <p>1 behaviours, and so forth, and, from a personal point of</p> <p>2 view, I used to give myself as much assurance as I could</p> <p>3 by walking around my establishments at all kinds of</p> <p>4 times of day and so forth. Other people will get</p> <p>5 assurance in different ways. I know when I visited</p> <p>6 Brook House, or any other of my establishments, I would</p> <p>7 make a point of walking around and feeling the</p> <p>8 atmosphere, but you know, and I know, that people who</p> <p>9 misbehave will hide it from people such as myself, as</p> <p>10 I walk around.</p> <p>11 Q. First of all, first question: how often, realistically,</p> <p>12 Mr Petherick, did you walk around Brook House during --</p> <p>13 let's just pick on the relevant period, April through</p> <p>14 to August 2017. How often did you actually go down</p> <p>15 there?</p> <p>16 A. Ideally, I would have gone there about every six weeks.</p> <p>17 But during that period, and it was 2017, wasn't it? The</p> <p>18 fact is that I was -- most of my efforts and interests</p> <p>19 were being directed towards HMP Birmingham in the</p> <p>20 aftermath of a disturbance there.</p> <p>21 Q. You said as much in a different context in an</p> <p>22 investigation interview with G4S, I think,</p> <p>23 in October 2017.</p> <p>24 A. Yes.</p> <p>25 Q. Because you were being asked about how -- the reason why</p> <p style="text-align: center;">Page 142</p> | <p>1 onsite. I would have expected the signs to have been</p> <p>2 picked up, to have been acted on, and I had other</p> <p>3 members of my team going in, the IMB, and I knew, as</p> <p>4 I have said in my statement, one of the IMB members was</p> <p>5 a former colleague governor, an experienced governor.</p> <p>6 Q. Is that Dick Weber --</p> <p>7 A. Yes.</p> <p>8 Q. -- Mr Weber?</p> <p>9 A. You know, when Dick and I were on site, we would talk,</p> <p>10 obviously, and so there are a number of things that you</p> <p>11 just look back and have great difficulty in explaining.</p> <p>12 Q. In May 2017, you appointed a chief operating officer?</p> <p>13 A. Mmm-hmm.</p> <p>14 Q. Paul Kempster?</p> <p>15 A. Yes.</p> <p>16 Q. Why was that?</p> <p>17 A. It was something that we had talked about, attempted to</p> <p>18 do previously, because I became very aware that I was</p> <p>19 not getting into establishments as much as I would want</p> <p>20 to, and so we agreed -- "we" being Peter Neden, myself,</p> <p>21 the company -- to invest in this to give more resilience</p> <p>22 into my operating division.</p> <p>23 Q. Was it designed to take some of the pressures off you,</p> <p>24 given you were focused on Birmingham at that point?</p> <p>25 A. It wasn't just Birmingham, but obviously Birmingham was</p> <p style="text-align: center;">Page 144</p> |

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| <p>1 my major focal point. It was a realisation that I was</p> <p>2 thinly spread, the resilience wasn't there, and also</p> <p>3 looking towards eventual succession planning.</p> <p>4 Q. What, for Ben Saunders?</p> <p>5 A. No, myself.</p> <p>6 Q. Was it in any way to keep an eye on Ben Saunders?</p> <p>7 A. No, no more nor less than anywhere else.</p> <p>8 Q. So we are clear, Mr Kempster, was his job going to be</p> <p>9 just Brook House?</p> <p>10 A. No, no, no. His job was going to be across my estate.</p> <p>11 There was a period of time, given that he had left the</p> <p>12 public sector, where the terms of him leaving led to</p> <p>13 some restrictions on his activities.</p> <p>14 Q. There were quite a few restrictions. He mentions it in</p> <p>15 his Verita interview <VER000271>, which again can be</p> <p>16 adduced. Although he was appointed at the beginning</p> <p>17 of May, the restrictions continued until November, he</p> <p>18 said the beginning of November?</p> <p>19 A. That would be about right. It's normally a six-month</p> <p>20 period.</p> <p>21 Q. Yes, because of Civil Service restrictions?</p> <p>22 A. Yes.</p> <p>23 Q. So although he'd been appointed in early May, his</p> <p>24 usefulness on the ground was pretty limited if not</p> <p>25 completely nugatory?</p> <p style="text-align: center;">Page 145</p> | <p>1 set formula for staff ratios, but you did talk about</p> <p>2 that some of the things that might impact on what, in</p> <p>3 your experience, is an appropriate ratio would be things</p> <p>4 such as the structure of the environment, the sight</p> <p>5 lines, those kinds of things. So those more kind of</p> <p>6 permanent measures, perhaps?</p> <p>7 A. Yes.</p> <p>8 THE CHAIR: Is there also a degree to which some of the more</p> <p>9 dynamic factors impact on the ratios? So, for example,</p> <p>10 in a high-security prison, one might expect that the</p> <p>11 ratio would be different --</p> <p>12 A. Very much to.</p> <p>13 THE CHAIR: -- to an open prison. I'm correct in</p> <p>14 understanding that?</p> <p>15 A. Yes.</p> <p>16 THE CHAIR: Okay, thank you. In that case, is there any</p> <p>17 element through which the process of the vulnerability</p> <p>18 of the population also should impact that ratio? So if</p> <p>19 we are talking about the type of people that you have</p> <p>20 detained in a place, you may have more need than in</p> <p>21 a different environment, should that ratio --</p> <p>22 A. Yes, it should.</p> <p>23 THE CHAIR: -- flex?</p> <p>24 A. I'm not aware of any set ratio, but those are some of</p> <p>25 the factors that should be involved in setting them.</p> <p style="text-align: center;">Page 147</p> |
| <p>1 A. No, I wouldn't say completely nugatory. They were more</p> <p>2 limited than ideal, but that was an HMPPS restriction.</p> <p>3 When I left, as I recall, the restriction wasn't so</p> <p>4 onerous. It was just about not being able to become</p> <p>5 involved in bidding activity.</p> <p>6 Q. Are you, Mr Petherick, prepared to accept that, as</p> <p>7 managing director of G4S Custodial & Detention Services</p> <p>8 during the relevant period, that you were personally</p> <p>9 responsible for the failures that we have seen?</p> <p>10 A. If anyone is tough on me, there's no-one tougher on me</p> <p>11 than myself, is how --</p> <p>12 Q. How tough are you going to be to this question,</p> <p>13 Mr Petherick?</p> <p>14 A. Yes, ultimately, I was at the top of the pyramid.</p> <p>15 Q. Yes. Because if you are not accountable, who else is?</p> <p>16 A. Yes, so, as I say, no-one can yell at me more than I can</p> <p>17 yell at myself.</p> <p>18 MR ALTMAN: Chair, that's all I'm going to ask Mr Petherick.</p> <p>19 Do you have any questions for him?</p> <p>20 THE CHAIR: Thank you, Mr Altman. Thank you, Mr Petherick.</p> <p>21 I do have just one brief question, actually, possibly</p> <p>22 two, depending on your answer.</p> <p>23 Questions from THE CHAIR</p> <p>24 THE CHAIR: You talked right at the beginning of your</p> <p>25 evidence around there not being a kind of necessarily</p> <p style="text-align: center;">Page 146</p> | <p>1 THE CHAIR: I want to ask you a question which is now with</p> <p>2 hindsight. Looking back, knowing that the profile of</p> <p>3 the type of person that was going to be cared for in</p> <p>4 Brook House was shifting, for a number of reasons that</p> <p>5 you touched on yourself, so that there was going to be</p> <p>6 an increase of time-served foreign national offenders</p> <p>7 coming into the estate who had previously been held in</p> <p>8 prisons, along with changes in the prison estate that</p> <p>9 were then impacting in IRCs, so the use of spice is one</p> <p>10 of those that we have talked about, do you think that</p> <p>11 sufficient thought was given to whether that ratio</p> <p>12 should have changed? Did it change enough?</p> <p>13 A. With the clarity of hindsight, no, to both of those</p> <p>14 elements. You look back and you think we should have</p> <p>15 been sharper about it, because the impact was there.</p> <p>16 And so that's one of the regrets I have, the reflections</p> <p>17 I have, put whatever word you like to it. I would</p> <p>18 certainly say we would have changed the approach.</p> <p>19 THE CHAIR: Thank you, that's helpful. One final question.</p> <p>20 Just in relation to -- you also talked about your own</p> <p>21 experience and how one of the ways that you would</p> <p>22 provide assurance to yourself of what the culture was</p> <p>23 like in an establishment where you were a member of</p> <p>24 the SMT was to walk around, but you also said that there</p> <p>25 might be other ways that other people would have of</p> <p style="text-align: center;">Page 148</p> |

1 doing it. Can you give me an example of how might
2 somebody do that if they weren't walking around?
3 **A. I think you could only do that by really close attention**
4 **to the data. Ideally, it's a blend of the two. But**
5 **from how I operate, myself, I wanted to get personal**
6 **assurance by looking for myself and appearing at the**
7 **difficult times, potentially, and just standing,**
8 **watching. I would call them kind of "coffee cup**
9 **conversations" with staff and, indeed, detained people,**
10 **just to have that conversation, and I would always go**
11 **down to the CSUs, wherever I was visiting, and actually**
12 **talk to the people there, both staff and the people in**
13 **residence, because that's one of the real ways that**
14 **I would get assurance for myself.**
15 THE CHAIR: When you say "difficult times", can you give me
16 an example of what you might mean?
17 **A. When people are very busy, meal times -- and we all know**
18 **that meal times can be a flashpoint anyway. Ideally,**
19 **you would have a blend of the quiet times when you can**
20 **sit and talk to people and at the busy times when they**
21 **may be under more pressure. So it's really trying to**
22 **get the feel for the whole day, and that's why, as I was**
23 **saying just now, I didn't get to Brook House often**
24 **enough during this period, but for very obvious other**
25 **reasons, and that's why we brought in the chief**

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1 **operating officer.**
2 THE CHAIR: Thank you. I don't have any other questions.
3 Thank you very much, Mr Petherick. I know you have been
4 with us for a long day. I do really appreciate your
5 evidence. Thank you very much.
6 **A. Thank you.**
7 **(The witness withdrew)**
8 MR ALTMAN: Thank you, chair. Can I suggest we take our
9 break now so that we can start the new witness after
10 a break? It is almost quarter past. Shall we say
11 3.30 pm?
12 THE CHAIR: Thank you.
13 (3.14 pm)
14 (A short break)
15 (3.33 pm)
16 MS SARAH LOUISE NEWLAND (affirmed)
17 Examination by MS TOWNSHEND
18 MS TOWNSHEND: Chair, we will now hear from Sarah Newland.
19 Ms Newland, please can you give your full name to
20 the inquiry?
21 **A. Sarah Louise Newland.**
22 Q. You have provided a witness statement which has the URN
23 <SER000458>; is that correct?
24 **A. Yes.**
25 Q. Chair, may this be adduced into evidence?

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1 THE CHAIR: Thank you, indeed.
2 MS TOWNSHEND: Ms Newland, I want to first ask you about
3 your background to working at Brook House, which you
4 deal with in your witness statement in paragraphs 3 to
5 8. Your first job in this kind of environment was at
6 Colnbrook IRC, so I understand, as a custody manager in
7 2004.
8 **A. Yes.**
9 Q. Then in December 2007, you were operations manager on
10 the overseas escorting contract for G4S?
11 **A. Yes.**
12 Q. This involved -- that was an office-based role?
13 **A. Yes.**
14 Q. And you managed over 200 overseas escorts repatriating
15 detained persons?
16 **A. Yes.**
17 Q. Then, in May 2011, you were head of Cedars predeparture
18 accommodation, which we will know as PDA --
19 **A. Yes.**
20 Q. -- which housed children and families which was run in
21 collaboration with the Barnardo's charity?
22 **A. Yes.**
23 Q. Then, from October 2016, which is the period that we are
24 most concerned with, because the relevant period
25 obviously comes within that, around six months later,

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1 you were head of Tinsley House, Cedars PDA and the
2 Borders suite. In terms of your responsibilities at
3 Brook House, you undertook duty director
4 responsibilities?
5 **A. Yes.**
6 Q. Please could you just briefly explain what that actually
7 meant?
8 **A. Yes. So the role of duty director was to be the senior**
9 **manager responsible for the day-to-day running of the**
10 **centre. I would do weekends approximately every six**
11 **weeks, and perhaps the odd day, so that meant checking**
12 **that staff were in the right areas, there were some**
13 **routine tasks that we had to do, we would check on ACDT**
14 **documents, we would chair ACDT reviews for those**
15 **individuals who were on constant supervision, chair all**
16 **40 reviews, visit the areas of the centre, talk to**
17 **staff, et cetera.**
18 Q. You said you did that every six weeks, so there would be
19 one shift that you would do that every six weeks, is
20 that right?
21 **A. It was a weekend every six weeks.**
22 Q. A whole weekend?
23 **A. Yes.**
24 Q. So two days worth of --
25 **A. Usually, yes.**

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38 (Pages 149 to 152)

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| <p>1 Q. In July 2018, after the relevant period, you then became 2 deputy director of Gatwick IRCs and PDA, and that's your 3 present role? 4 A. I think my statement says I became the deputy director 5 in July '19. 6 Q. Apologies, July '19. 7 A. Yes. 8 Q. That meant that you TUPEd over from G4S to Serco when 9 they took over the contract in May 2020? 10 A. That's correct, yes. 11 Q. I want to firstly ask you, as a substantive topic, about 12 the Jimmy Mubenga case. Mr Mubenga died in October 2010 13 after three G4S guards on a plane in Heathrow Airport 14 restrained him in what the coroner found to be in an 15 unlawful manner and this was against a background of 16 pervasive racism within G4S. In terms of your role at 17 that time, you were G4S operations manager responsible 18 for overseas escorts team removing foreign nationals and 19 this was at the time of Mr Mubenga's death in 2010? 20 A. Yes. 21 Q. In your interview with an academic, Dominic Aitken -- 22 I won't bring this up, you have already had a chance to 23 look at it -- you said, during that time, your key role 24 was dealing with staff. I want to take you now briefly 25 to the coroner's report, <INQ000176>, pages 16 to 17.</p> <p style="text-align: center;">Page 153</p> | <p>1 off". " 2 The coroner said, at paragraph 43: 3 "These texts were not evidence of a couple of rotten 4 apples but rather seemed to evidence a more pervasive 5 racism within G4S. Evidence provided in the run-up to 6 the inquest about these texts from one of the DCOs was 7 to the effect that lots of his work colleagues and 8 acquaintances would send such material between 9 themselves. Evidence at the hearing itself was that 10 some of the texts were sent by other DCOs (ie, other 11 than the three involved in the incident resulting in 12 Mr Mubenga's death)." 13 I'm sorry, chair, I've just been told there seems to 14 be no signal on the live stream. Perhaps we could just 15 pause for a moment? 16 Thank you. We can take that down. 17 Ms Newland, were you aware of the inquest's 18 findings, particularly in relation to the racism that 19 was criticised within that report? 20 A. Certainly not at the time of Mr Mubenga's death. 21 I don't know at what point those racist messages came to 22 light. Mr Mubenga, as you say, died in October 2010. 23 The contract transferred to Reliance in May -- end 24 of April of the following year, so I was only on the 25 contract for another six months after that. But I was</p> <p style="text-align: center;">Page 155</p> |
| <p>1 Chair, it is your bundle at tab 42. Looking there at 2 paragraph 39, this is the coroner's report into 3 Mr Mubenga's death. The coroner says: 4 "Following the death of Mr Mubenga, racist material 5 was found on the private mobile phones of two DCOs who 6 were [responsible] in the attempted removal of 7 Mr Mubenga. 8 "These comprised numerous text messages, the 9 contents of which were explicitly racist. Most of these 10 text messages had been sent to the mobile phones of 11 the DCOs concerned by third persons. However, some were 12 forwarded to others by these DCOs. Further, the text 13 messages were not deleted notwithstanding their 14 exceptionally offensive content. 15 "Some of the messages referred to 'immigrants' ... 16 specifically. For example, one message read as follows: 17 "'fuck off and go home you free-loading, benefit 18 grabbing, kid producing, violent, non-English speaking 19 cock suckers and take those hairy faced, sandal wearing, 20 bomb making, goat fucking, smelly rag head bastards with 21 you'. 22 "Another, in the case of another of the DCOs, read: 23 "'just been sacked from my new job on the wines and 24 spirits section at Asda. A Muslim came in and asked me 25 to recommend a good port. I said, 'Dover, now fuck</p> <p style="text-align: center;">Page 154</p> | <p>1 not aware of those messages at that time, no. 2 Q. Were you aware of those kinds of racist attitudes that 3 were held amongst G4S escorting staff? 4 A. Not to the extent that is in the report, no. No. There 5 may be isolated incidents brought to our attention. 6 Certainly I can recall being involved in disciplinary 7 investigations relating to inappropriate behaviour, some 8 of which was picked up on recording devices in escort 9 vehicles. But nothing of that nature. 10 Q. When you say "inappropriate behaviour", do you mean 11 racist remarks such as the ones we have just seen? 12 A. I don't recall anything specifically racist, no. 13 Q. What do you mean by "inappropriate behaviour"? 14 A. Swearing, unprofessional language. 15 Q. So were you aware of any racist attitudes amongst staff? 16 A. No. 17 Q. Were you aware of what steps were taken after this time 18 by G4S in order to address what was described as 19 pervasive racism within G4S? 20 A. No. You know, as I've said, following Mr Mubenga's 21 death, I can't remember the time line exactly, at what 22 point, you know, the inquest started, but I left the 23 contract fairly shortly after that, so I don't know 24 specifically what was done by Reliance, as it would have 25 been, from April in relation to those issues.</p> <p style="text-align: center;">Page 156</p> |

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| <p>1 Q. So within those six months, did you -- was there any 2 action taken at that point, whilst you were still 3 working there?</p> <p>4 A. I don't recall. Like I say, I'm not sure at what point 5 those messages came to light or were disclosed to -- 6 whether it was G4S or then Reliance was responsible for 7 those staff, but, you know, there was a lot of activity 8 to demobilise the contract as well for handover, so it 9 was a busy period.</p> <p>10 Q. So the coroner's report came out in July 2013, obviously 11 some time after that, although I don't know when exactly 12 the racist messages came to light?</p> <p>13 A. Yes, so I was no longer on the contract at that point.</p> <p>14 Q. I want to bring up, please, on screen the witness 15 statement of Nathan Ward, <DL0000141>, page 4, please, 16 Zaynab. It is tab 2, chair. This is at paragraph 10: 17 "Around this time, G4S had lost the immigration 18 overseas escorting contract and some of the escorting 19 staff were transferred into Gatwick IRCs and 20 predeparture accommodation. Sarah Newland, the G4S 21 operations manager (responsible for overseeing G4S's 22 overseas escorts team for removing foreign nationals) at 23 the time of the death of Jimmy Mubenga on 24 12 October 2010, was promoted in May 2011 to be head of 25 Cedars. As far as I was aware, there was no real formal</p> <p style="text-align: center;">Page 157</p> | <p>1 since November 2019. She has continued in this role 2 since Serco took over running the centres in May 2020."</p> <p>3 What do you say to that suggestion, that you said 4 that managers like you were sat in an office and 5 couldn't be expected to control what happened on the 6 ground? Did you say that to Mr Ward?</p> <p>7 A. I don't recall having that conversation with Mr Ward. 8 I deal with this in my statement. It is plausible that 9 we did discuss the death of Mr Mubenga because it was 10 a relatively recent event at that time, but I don't 11 recognise the attitude that he describes from me. You 12 know, the death of Mr Mubenga was a shocking event for 13 all of us that were there at the time, and for him to -- 14 you know, I refute the fact that I was, you know, quite 15 dismissive of it, as he describes.</p> <p>16 Q. Please can we turn to your Aitken interview, the one 17 that we referred to earlier. Zaynab, it is <INQ000078>, 18 page 1. Just scroll down, please, Zaynab. Under 7.10 19 "Escorting?", it says: 20 "Wasn't detainee-facing, it was office job. 200 21 employees. Quality assurance, which is difficult since 22 remote working. Lots of use of force, allegations of 23 assault, viewing CCTV footage. Coordination with 24 Professional Standards Unit." 25 You say there that it wasn't detainee-facing, it was</p> <p style="text-align: center;">Page 159</p> |
| <p>1 appointment and interview process."</p> <p>2 Pausing there, do you know if there was a formal 3 process in which you were appointed?</p> <p>4 A. No. I recall a conversation with Andy Clark about the 5 role, and I recall meeting Mr Nathan Ward, but I don't 6 know whether there were other candidates that they were 7 considering.</p> <p>8 Q. Was it a formal interview that took place?</p> <p>9 A. No, it wasn't. I do remember being asked to go and meet 10 Mr Ward at Tinsley House, which I did. It wasn't 11 a formal interview, which I think is what I was 12 expecting, but I'm -- you know, I participated as much 13 as I could in the process.</p> <p>14 Q. I will read on. This is Mr Ward again: 15 "I was asked by managing director Andy Clark to have 16 an informal conversation with her, so I took the 17 opportunity to ask her about the death of Mr Mubenga and 18 whether she had any idea as to what had gone wrong. She 19 told me that she was aware of a bad culture, but 20 managers like her were sat in an office and could not 21 control what happened on the ground. I was taken aback 22 at the lack of responsibility as an operations manager 23 but it presented as a typical attitude. Sarah Newland 24 was promoted to head of Tinsley House in 2017 and has 25 been a deputy director at Gatwick IRCs</p> <p style="text-align: center;">Page 158</p> | <p>1 an office job?</p> <p>2 A. Yes.</p> <p>3 Q. That sounds quite like what Mr Ward said that you said 4 to him, that it was an office-based type of job?</p> <p>5 A. (Witness nods).</p> <p>6 Q. Would you agree that that was likely, then, that you 7 said something similar to that to Mr Ward?</p> <p>8 A. Like I said, it's possible we -- you know, we discussed 9 Mr Mubenga and my role, but I think, you know, the point 10 I'm making is, he suggests that I was quite dismissive 11 of what happened, and that's the bit I disagree with. 12 He describes it as a "typical attitude" and I didn't 13 particularly work with Nathan Ward, so I'm not sure how 14 he could use the word "typical".</p> <p>15 Q. What about, because you were an office job and you were 16 a manager, you couldn't control what happened on the 17 ground? Is that likely to be something that you said?</p> <p>18 A. No, because there were elements of control. I think, 19 you know, I was not detainee facing. I didn't go out on 20 the escorts -- well, I did on occasion, but not 21 routinely. But if things were brought to our attention, 22 then they were dealt with, and that was through a number 23 of means. Sometimes staff would report things 24 anonymously, sometimes, as part of a standard review of 25 use of force that had occurred in a vehicle, we would</p> <p style="text-align: center;">Page 160</p> |

40 (Pages 157 to 160)

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| <p>1 pick up on things that were, you know, not appropriate</p> <p>2 and, you know, it would be dealt with. So, you know,</p> <p>3 I did take responsibility for things when they came to</p> <p>4 light.</p> <p>5 Q. Please could we go to page 4 of the same document.</p> <p>6 I think it -- on this version, it may be just at the end</p> <p>7 of page 3. The third line down from the bottom</p> <p>8 paragraph, you say:</p> <p>9 "I don't sit here and pretend to know what happened</p> <p>10 on that aircraft, because I wasn't there, and there have</p> <p>11 been many different versions of events from different</p> <p>12 people who were involved, and I guess no-one will ever</p> <p>13 know whether what they did caused his death or who</p> <p>14 played what part in that, but, you know, I know on</p> <p>15 a personal level that marriages broke up, got into debt,</p> <p>16 you know, it really did affect them. And that will stay</p> <p>17 with me in my career in managing these things, so having</p> <p>18 seen the worst outcome, I think just makes you focus</p> <p>19 a little more on things at times when other people might</p> <p>20 not see it through the same eyes, I'll be like, 'No, no,</p> <p>21 no, we're doing this now'."</p> <p>22 You talked there a bit about responsibility. As</p> <p>23 manager of those front-line staff, what responsibility,</p> <p>24 if any, did you take in terms of what happened to</p> <p>25 Mr Mubenga?</p> <p style="text-align: center;">Page 161</p> | <p>1 rather than later. But obviously any changes would</p> <p>2 require Home Office agreement as well. We hadn't got to</p> <p>3 that stage prior to Mr Mubenga's death.</p> <p>4 Q. So what you are saying now is, these are things that</p> <p>5 took place after Mr Mubenga's death in order to try and</p> <p>6 prevent it from happening again?</p> <p>7 A. Yes.</p> <p>8 Q. Rather than things that may have been in place</p> <p>9 beforehand, what you could have done beforehand?</p> <p>10 A. The G4S review of restraint on aircraft and suggested</p> <p>11 amendments to techniques was taking place prior to</p> <p>12 Mr Mubenga's death, but the introduction of the HOMES</p> <p>13 package, which is what came from that, was after his</p> <p>14 death.</p> <p>15 Q. Is there something you think that you could have done,</p> <p>16 even in some small part, as a senior manager to have</p> <p>17 prevented Mr Mubenga's death prior to him dying rather</p> <p>18 than the steps that you took afterwards?</p> <p>19 A. Well, we had taken those steps prior to his death, in</p> <p>20 terms of the restraint. I just want to be clear on the</p> <p>21 timeline. So, within G4S, we had tried to take some</p> <p>22 action on that prior to his death. It was afterwards</p> <p>23 that the Home Office commissioned HMPPS to do a full</p> <p>24 review which is what led to the HOMES package, but G4S</p> <p>25 had started that work and I was part of the support team</p> <p style="text-align: center;">Page 163</p> |
| <p>1 A. There had been some recognition within the overseas</p> <p>2 contract that control and restraint wasn't necessarily</p> <p>3 an appropriate way to restrain somebody on an aircraft.</p> <p>4 That had become increasingly sort of relevant during my</p> <p>5 tenure on that contract to the point where G4S had</p> <p>6 commissioned one of its use of force instructors to</p> <p>7 start looking at how techniques could potentially be</p> <p>8 adapted for use on an aircraft. Unfortunately, you</p> <p>9 know, Mr Mubenga's death -- this was prior to</p> <p>10 Mr Mubenga's death, but those changes hadn't come in</p> <p>11 prior to Mr Mubenga's death. After he died, there was</p> <p>12 a review of restraint techniques on an aircraft, which</p> <p>13 led to the current HOMES package, which is what overseas</p> <p>14 escorts use to restrain people for the purposes of</p> <p>15 removal.</p> <p>16 Q. But in terms of your responsibilities, my question was,</p> <p>17 as a manager of those staff, did you take any</p> <p>18 responsibility for what had happened?</p> <p>19 A. So I think, in terms of reinforcing the need for</p> <p>20 a review of restraint, yes, I did take responsibility</p> <p>21 for that. The individual that was seconded by G4S to</p> <p>22 look at that reported to me, had raised his concerns to</p> <p>23 me, I had taken those concerns, you know, to my line</p> <p>24 management within G4S, with, you know, some</p> <p>25 encouragement that we do something, you know, sooner</p> <p style="text-align: center;">Page 162</p> | <p>1 around that because, as I said, one of the instructors</p> <p>2 was part of my team.</p> <p>3 Those escorts on that particular job with</p> <p>4 Mr Mubenga, I had not had concerns raised with me about</p> <p>5 them prior to his death; certainly not in terms of some</p> <p>6 of the things we are discussing now. You know, like</p> <p>7 I said, if things of that nature did come to my</p> <p>8 attention, then they were dealt with. You know, I did</p> <p>9 a lot of investigations on that contract, a lot of</p> <p>10 disciplinary hearings. So, you know, I did take</p> <p>11 responsibility when I was aware of things. But, you</p> <p>12 know, I was not there with that team, with Mr Mubenga,</p> <p>13 on that day.</p> <p>14 Q. You have said what responsibility you took afterwards.</p> <p>15 But now do you see yourself as having any responsibility</p> <p>16 for what happened?</p> <p>17 A. Well, I don't know how I could have dealt with racist</p> <p>18 texts that didn't come to light until after. You know,</p> <p>19 like I said, if there were issues brought to our</p> <p>20 attention, then they were dealt with. But these -- you</p> <p>21 know, these texts that are referred to here, they were</p> <p>22 not brought to our attention at the time. There was not</p> <p>23 an indication that somebody may have behaved in</p> <p>24 a particular way because of a racist attitude.</p> <p>25 Q. We will come to that in a moment. In terms of G4S, you</p> <p style="text-align: center;">Page 164</p> |

41 (Pages 161 to 164)

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| <p>1 have said at the top of page 4 that we have just looked 2 at that there were implications for officers' personal 3 lives after this happened, and you also criticise on 4 page 6 -- if we can go to page 6, please -- media 5 criticism of G4S on a personal level as insulting. 6 You have described that the Medway Panorama was 7 demoralising to staff and in your witness statement you 8 have also criticised Callum Tulley's decision to do 9 undercover reporting at Brook House. Those incidents 10 that we have just spoken about, Jimmy Mubenga's death 11 and also the Medway programme and, of course, what 12 happened at Brook House, of course they exposed serious 13 abuse of people in G4S care. Ought that to have been 14 a priority for you, rather than the concerns about 15 individual G4S members of staff's personal lives or the 16 media criticism of G4S? 17 A. Sorry, I'm not sure I understand the question. 18 Q. So you have described Jimmy Mubenga's death's effect on 19 the personal lives of officers, of the G4S officers, and 20 you have also described the media reporting of G4S on 21 a personal level as "insulting", that's how you have 22 described it, and that Medway -- the Medway Panorama 23 programme was demoralising for staff. You have also 24 criticised Callum Tulley in your witness statement for 25 exposing -- for his decision to do undercover reporting,</p> <p style="text-align: center;">Page 165</p> | <p>1 to preserve the rights and dignities of the detainee' 2 and that the culture amongst DCOs is one in which 3 [detainees] are treated as individuals and their rights 4 and dignities are respected and where the use of force 5 is seen absolutely as a last resort." 6 She's talking about the Independent Advisory Panel 7 on Non-compliance Management which I understand was 8 headed by Stephen Shaw in 2014 and in response to 9 Mr Mubenga's death. Do you agree there that 10 a value-based practice was necessary at that time, after 11 Jimmy Mubenga's death? 12 A. I think, yes, and at all times, you know, I completely 13 agree with the statement that's made there, and, you 14 know, that lots changed as a result of Mr Mubenga's 15 death and as a result of the Panorama documentary and, 16 you know, the level of governance and assurance around 17 ethical behaviour is much more on this contract now with 18 Serco than it was at the time. There are a lot more 19 measures in place to ensure that doesn't happen. 20 Q. Was this something that was raised by your managers at 21 G4S after Jimmy Mubenga's death, aside from the Shaw 22 report? 23 A. I don't recall. 24 Q. After Stephen Shaw's report, and in particular this 25 emphasis on values-based practice, particularly for use</p> <p style="text-align: center;">Page 167</p> |
| <p>1 rather than, say, coming to you -- or not necessarily 2 you, coming to see management or someone? 3 A. Yes. 4 Q. My question is, is that -- is it more of a priority, 5 looking at G4S's reputation and so on, than detainees' 6 welfare? 7 A. No. No, I think there's quite a lot of comments that 8 have been put together there that I've said through what 9 appears to be quite a lengthy interview. So I don't 10 agree that those were my priorities. I think my 11 criticism of Mr Tulley was not taking evidence of what 12 he saw, if he didn't feel he could, to G4S, then to the 13 police at the time that those incidents were recorded by 14 him. 15 Q. Can we turn now to Emma Ginn's witness statement, 16 <BHM000041>. Emma Ginn is the director of 17 Medical Justice. It is tab 45 of the bundle. It is 18 pages 38 to 39, paragraph 108(d), just over the page, 19 please: 20 "The recognition that not only ..." 21 She is talking about Jimmy Mubenga's death. In 22 particular she says: 23 "The recognition that not only safer restraint 24 techniques are needed but that it is also necessary to 25 ensure that DCOs act 'ethically and in a way which seeks</p> <p style="text-align: center;">Page 166</p> | <p>1 of force, what steps were then taken within G4S to 2 ensure this value-based system? 3 A. Well, you know, I'll go back to the fact the contract 4 transfer happened fairly swiftly after the death of 5 Mr Mubenga, so although I was still employed by G4S, 6 I was then across at the Cedars predeparture 7 accommodation, so I don't think I can comment 8 particularly on this. I know what we did at Cedars PDA, 9 but that wasn't Brook House and that wasn't oversees 10 escorting. 11 Q. I want to take you back again to your Aitken interview, 12 please, <INQ000078>, page 31. In fact, page 3. It 13 should be the middle of the page. In fact, I don't 14 think it is there. If I can just read it out, that will 15 be quicker, if that's okay. You said in your 16 Dominic Aitken interview in respect of Mr Mubenga that 17 there was: 18 "... an insinuation that there was a bit of 19 a culture but I think we tried to eradicate that culture 20 but, arguably, you can only deal with an issue when it 21 comes to light and sometimes it was just a case of 22 waiting until those issues came to light and you could 23 deal with them." 24 That's something that you have just said just now, 25 in respect of the racist texts and Mr Mubenga. Did you</p> <p style="text-align: center;">Page 168</p> |

42 (Pages 165 to 168)

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| <p>1 accept the coroner's finding that there was evidence of</p> <p>2 pervasive racism?</p> <p>3 A. Well, I don't -- yeah, I mean, I can't argue with racist</p> <p>4 text messages that were found on the DCOs' mobile</p> <p>5 phones, absolutely.</p> <p>6 Q. What about the statement that it was pervasive racism,</p> <p>7 rather than just those two individuals?</p> <p>8 A. Well, I assume that conclusion has come from the amount</p> <p>9 of people who were sharing those messages.</p> <p>10 Q. So did you accept that this was evidence of pervasive</p> <p>11 racism?</p> <p>12 A. In the coroner's inquest, yeah, I'm not going to dispute</p> <p>13 that.</p> <p>14 Q. So is it your approach that only when issues have come</p> <p>15 to light that you have to -- and you have to deal with</p> <p>16 them, even when there are serious allegations of</p> <p>17 systemic racism and abuse, do you have to wait for those</p> <p>18 issues to come to light before doing anything?</p> <p>19 A. I think you can only deal with what you know or what</p> <p>20 people are able to provide you with evidence of.</p> <p>21 Q. Is it possible to have a more proactive approach in</p> <p>22 trying to ensure that there is that rights-based culture</p> <p>23 that we have just been speaking about?</p> <p>24 A. Yes.</p> <p>25 Q. So that "wait and see" approach is perhaps not an</p> <p style="text-align: center;">Page 169</p> | <p>1 I personally chair a monthly meeting with resident</p> <p>2 representatives at Brook House. We talk about staff</p> <p>3 culture and their experience of staff behaviour. That's</p> <p>4 an agenda item that I've personally added to that</p> <p>5 meeting, to hear their views directly.</p> <p>6 Q. I'll come to that in just a second. In your witness</p> <p>7 statement, at paragraph 138, you said:</p> <p>8 "Although I do not agree that senior management at</p> <p>9 Brook House during the relevant period have direct</p> <p>10 responsibility for what occurred, it would be</p> <p>11 unreasonable for me to state that senior management did</p> <p>12 not have partial indirect responsibility. Culture</p> <p>13 within IRCs has to be driven by senior leaders."</p> <p>14 You go on in the following paragraph to say you do</p> <p>15 not think it is fair to say that they, individuals, are</p> <p>16 the only ones responsible when holistically considering</p> <p>17 the environment culture at Brook House during the</p> <p>18 relevant period. At paragraph 140, you say how the</p> <p>19 atmosphere created an environment where unacceptable</p> <p>20 behaviour occurred. How would you describe that</p> <p>21 atmosphere or culture in 2017?</p> <p>22 A. I think it was -- you know, Brook House could be</p> <p>23 a difficult place to work. It was -- there were</p> <p>24 stressful days for staff. There were high rates of</p> <p>25 incidents. There were higher numbers of residents.</p> <p style="text-align: center;">Page 171</p> |
| <p>1 appropriate one, especially after we have seen</p> <p>2 Jimmy Mubenga's death, Medway and now what we have seen</p> <p>3 at Brook House?</p> <p>4 A. Yes, although I -- you know, I go back to the point,</p> <p>5 I was managing Tinsley House at the time of the relevant</p> <p>6 period, so, you know, I was there as duty director, as,</p> <p>7 on occasions, I have outlined in my statement, but my</p> <p>8 role was to manage Tinsley House.</p> <p>9 Q. Do you still adopt the same approach now, as you manage</p> <p>10 both Tinsley House and Brook House?</p> <p>11 A. "Approach", as in ...?</p> <p>12 Q. A "wait and see" approach, wait and see if evidence</p> <p>13 comes to light?</p> <p>14 A. No, that was a comment I made, you know, in an interview</p> <p>15 five years ago. I'm in a different role now. I -- as</p> <p>16 I alluded to before, there is lots in place now, driven</p> <p>17 by Serco and mandated by the Home Office contract, to</p> <p>18 ensure that staff are displaying ethical behaviour.</p> <p>19 Q. And, in particular, it's important for senior management</p> <p>20 to behave in an ethical way, as you said?</p> <p>21 A. Yeah, absolutely. Culture is, you know, driven from</p> <p>22 senior leaders, and, you know, the work that we're doing</p> <p>23 on positive detention culture at Gatwick has started</p> <p>24 with the SMT and is now being driven through, you know,</p> <p>25 the first-line managers and the officers. You know,</p> <p style="text-align: center;">Page 170</p> | <p>1 They were, more often than not, quite frustrated with</p> <p>2 their situation. So I think, you know, I deal in my</p> <p>3 statement with a number of what I see as contributory</p> <p>4 factors. You know, the staffing levels, the rates of</p> <p>5 incidents, the fact that I felt that staff were often</p> <p>6 just running from one problem to another, firefighting,</p> <p>7 I suppose, and didn't always have time to reflect and</p> <p>8 try and understand what was driving behaviour, they were</p> <p>9 just dealing with it as it occurred.</p> <p>10 Q. How would you describe that culture -- have that kind of</p> <p>11 culture now? You said there are steps that have been</p> <p>12 taken by you in particular to improve staff culture.</p> <p>13 What has changed, if anything, since 2017?</p> <p>14 A. So the -- in terms of what I specifically do, along with</p> <p>15 chairing the meeting that I described earlier, I also</p> <p>16 quality assure any resident complaint responses that</p> <p>17 complain about staff behaviour to make sure that I think</p> <p>18 we've been fair in our considerations. There's</p> <p>19 a section of the contract that deals specifically with</p> <p>20 healthy staff culture, so I'm part of a meeting biweekly</p> <p>21 with the Home Office where we consider resident</p> <p>22 complaints about staff, staff-on-staff grievances,</p> <p>23 reasons given for leaving Serco, if that's what people</p> <p>24 have elected to do, and also we track where there's been</p> <p>25 three or more uses of force in a role in a three-month</p> <p style="text-align: center;">Page 172</p> |

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| <p>1 period per officer, and where that has been the case,</p> <p>2 then there's a trigger to look further into those</p> <p>3 circumstances to ascertain whether there's anything</p> <p>4 there that we need to be concerned about.</p> <p>5 Q. Would you say that the staff culture is driven by the</p> <p>6 senior managers?</p> <p>7 A. Yes.</p> <p>8 Q. How much responsibility did senior management have for</p> <p>9 the culture that allowed the mistreatment at</p> <p>10 Brook House, do you think?</p> <p>11 A. I think there were not the same governance mechanisms in</p> <p>12 place there at that time, and I think the disciplinary</p> <p>13 outcomes that I -- from the meetings that I chaired</p> <p>14 post Panorama indicate where staff have given what they</p> <p>15 felt were mitigating circumstances for some of</p> <p>16 the incidents, which were around staffing levels and,</p> <p>17 you know, how stressed they felt as a result of that.</p> <p>18 Q. I want to now ask you about the senior management team</p> <p>19 and your relationships with individuals within it. As</p> <p>20 we have already mentioned, you attended Brook House</p> <p>21 every six weeks for SMT meetings -- sorry, every month,</p> <p>22 I understand, for SMT meetings?</p> <p>23 A. Yes.</p> <p>24 Q. Physically attended Brook House, and then again every</p> <p>25 six weeks for your duty director role.</p> <p style="text-align: center;">Page 173</p> | <p>1 him abrupt and indecisive, which meant that at SMT</p> <p>2 meetings, there was little progress in some matters.</p> <p>3 Again, are you able to give any specific examples of</p> <p>4 what those particular matters might be?</p> <p>5 A. Not that I can accurately recall, although, just, as</p> <p>6 I say, I think I found those meetings frustrating in</p> <p>7 general, just because I felt there was a lot of talking</p> <p>8 and a lot of suggestion of who should do what, but</p> <p>9 I wasn't particularly clear of what the actions were</p> <p>10 coming out of that, although I would add that probably</p> <p>11 the majority of the issues related more to Brook House</p> <p>12 than Tinsley House at that time.</p> <p>13 Q. You say that now you line manage Steve Skitt?</p> <p>14 A. Yes.</p> <p>15 Q. And you find he seems to need clear direction?</p> <p>16 A. Yes, I had a view of Steve at the time when I didn't</p> <p>17 line manage him and I didn't work particularly close</p> <p>18 with him, but I think, you know, Steve likes clear</p> <p>19 direction and I think that was lacking for him which,</p> <p>20 you know, with hindsight, I can see why some of those</p> <p>21 behaviours were as I perceived them at the time.</p> <p>22 Q. Ben Saunders was his manager?</p> <p>23 A. Yes.</p> <p>24 Q. Is it your view, then, that Ben Saunders wasn't</p> <p>25 providing the necessary clear management and clear</p> <p style="text-align: center;">Page 175</p> |
| <p>1 A. Yes.</p> <p>2 Q. In terms of your relationship and views of Ben Saunders,</p> <p>3 you have -- the centre director. You have said in your</p> <p>4 witness statement that Ben's style was more</p> <p>5 laissez-faire and consultative than you felt comfortable</p> <p>6 with. You said that "I recall feeling frustrated during</p> <p>7 SMT meetings, the lack of decisive action and control of</p> <p>8 the more vocal members of the team". You also say that</p> <p>9 you believe Stacie Brown [sic], Michelle Brown and</p> <p>10 Duncan Partridge filed grievances against him. In what</p> <p>11 way was he laissez-faire?</p> <p>12 A. Ben liked consensus of opinion on matters and sometimes</p> <p>13 it is just not possible to reach a consensus. I think</p> <p>14 it is fine to discuss and invite people's ideas, but</p> <p>15 there comes a point where there has to be some direction</p> <p>16 around what actions are going to be taken and who is</p> <p>17 going to be accountable for those actions. For me, that</p> <p>18 sometimes felt like it was lacking.</p> <p>19 Q. Were there any particular issues which you felt that he</p> <p>20 was lacking that decisive action on?</p> <p>21 A. No, I think it was just a general theme of the meetings,</p> <p>22 as I recall them.</p> <p>23 Q. Would you describe that as a lack of leadership?</p> <p>24 A. Yes.</p> <p>25 Q. In terms of Steve Skitt, you have said that you found</p> <p style="text-align: center;">Page 174</p> | <p>1 direction that he needed?</p> <p>2 A. Yes.</p> <p>3 Q. Michelle Brown, paragraph 24 of your statement, you said</p> <p>4 that she was domineering and tried to intimidate others.</p> <p>5 Who are you referring to there?</p> <p>6 A. Specifically, I can recall Jules Williams, Dan Haughton.</p> <p>7 Q. You also say that you challenged her on incorrect</p> <p>8 statements when others wouldn't. What kind of incorrect</p> <p>9 statements are you talking about there?</p> <p>10 A. Michelle would sometimes sort of quote policies or</p> <p>11 procedures in support of her argument, which, you know,</p> <p>12 on occasion, I found to be inaccurate. But, you know,</p> <p>13 I felt able to raise those inaccuracies with Michelle,</p> <p>14 but I think others didn't have the confidence to do so.</p> <p>15 Q. What was her reaction, when you did challenge her?</p> <p>16 A. Michelle didn't really take kindly to challenge. So</p> <p>17 I think if she did accept it, it was perhaps</p> <p>18 begrudgingly.</p> <p>19 Q. Turning then to Lee Hanford, at paragraph 26 of your</p> <p>20 statement, he took over as director when Ben Saunders</p> <p>21 left and you said there was a marked difference in the</p> <p>22 cohesiveness of the SMT and progress -- and there became</p> <p>23 progress on long-term issues. Again, what were those</p> <p>24 long-term issues which progress was made on?</p> <p>25 A. I'm not sure I can recall specific examples, but I think</p> <p style="text-align: center;">Page 176</p> |

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| <p>1 it just felt like we -- you know, Lee made decisions,</p> <p>2 Lee gave direction, Lee, you know, sought authority from</p> <p>3 the Home Office for things. You know, it just felt like</p> <p>4 things moved forward at a pace that I hadn't experienced</p> <p>5 before. I also felt he had better control of the team.</p> <p>6 He was more directional, I suppose.</p> <p>7 Q. I won't bring it up on screen but I just want to read</p> <p>8 out a very short remark from Ben Saunders' Verita</p> <p>9 interview which I know you have seen. It is <VER000216></p> <p>10 pages 12 to 14, paragraph 171. He said:</p> <p>11 "There was quite a needy SMT. They needed a lot of</p> <p>12 support. They were quite sensitive. They all took</p> <p>13 their jobs really seriously."</p> <p>14 What do you say to that?</p> <p>15 A. I wouldn't have used the words "needy" and "sensitive"</p> <p>16 to describe the SMT, in broad terms. I think, you know,</p> <p>17 some people did take their jobs seriously.</p> <p>18 Q. Were you one of those people?</p> <p>19 A. Yes. But I think, you know, "needy" and "sensitive",</p> <p>20 no. I think in my statement I have used different</p> <p>21 words. It certainly felt fractured. People didn't work</p> <p>22 as a team. There were some positive relationships among</p> <p>23 individuals, but that wasn't consistent across the team.</p> <p>24 Q. That leads us to what Lee Hanford told Verita and also</p> <p>25 told this inquiry. He said that the culture within the</p> <p style="text-align: center;">Page 177</p> | <p>1 A. Yes.</p> <p>2 Q. -- but you were at the SMT meetings when this was</p> <p>3 discussed. Is that how you got an impression of that,</p> <p>4 from working with colleagues, that they were -- the</p> <p>5 senior managers there were just too busy?</p> <p>6 A. Yes. There was a perception that that was the case,</p> <p>7 although, as I've said, that wasn't my personal</p> <p>8 experience. You know, I think, on reflection, there</p> <p>9 were periods where people were absent, lengthy periods</p> <p>10 of absence, which meant the team was potentially running</p> <p>11 short at Brook House. People would leave post and then</p> <p>12 there was a gap between them being replaced, which</p> <p>13 I imagine would play into that as well, from what I can</p> <p>14 recall.</p> <p>15 Q. In terms of perhaps lower down the tree, in general,</p> <p>16 DCOs, DCMs and so on, you said in your Verita</p> <p>17 interview -- again, there is no point bringing it up,</p> <p>18 but <VER000223> that there was insufficient staffing</p> <p>19 levels with a high turnover of staff who were</p> <p>20 inexperienced. I assume there you're talking about the</p> <p>21 relevant time in 2017?</p> <p>22 A. Yes.</p> <p>23 Q. You say at paragraph 34 of your statement that there</p> <p>24 were -- that concerns over high staff turnover were</p> <p>25 regularly raised, although this wasn't an issue, again,</p> <p style="text-align: center;">Page 179</p> |
| <p>1 SMT was toxic and compared it to Emmerdale. Would you</p> <p>2 agree with that statement?</p> <p>3 A. I don't know what he means by the "Emmerdale" reference,</p> <p>4 but --</p> <p>5 Q. He said the culture was toxic, and I think what he meant</p> <p>6 by, or what he explained that he meant by, it being like</p> <p>7 being on Emmerdale was, there was lots of in-fighting,</p> <p>8 lots of grievances --</p> <p>9 A. Right.</p> <p>10 Q. -- that there were issues between different members of</p> <p>11 the SMT team, and it was essentially dysfunctional?</p> <p>12 A. Yes.</p> <p>13 Q. Do you recognise that?</p> <p>14 A. Yes, I recognise elements of what Lee has described,</p> <p>15 yes.</p> <p>16 Q. I want to ask you now about staffing levels. I don't</p> <p>17 think it's necessary to bring it up on screen, but the</p> <p>18 Verita report, <CJS005923>, at page 77, found there were</p> <p>19 continuing problems at Brook House resulting from a lack</p> <p>20 of senior management capacity and lack of staff to</p> <p>21 support them in fulfilling their roles. You said in</p> <p>22 your witness statement, paragraph 32, that this suggests</p> <p>23 that managers were too busy. You wouldn't say that in</p> <p>24 relation to Tinsley House, which you, of course, were</p> <p>25 managing at the time --</p> <p style="text-align: center;">Page 178</p> | <p>1 at Tinsley House?</p> <p>2 A. No.</p> <p>3 Q. Can you remember what, if anything, was done once those</p> <p>4 concerns were raised at SMT meetings?</p> <p>5 A. No. No, I'm afraid I can't.</p> <p>6 Q. You said at paragraph 36 of your statement that the</p> <p>7 concerns were particularly raised when Tinsley House was</p> <p>8 re-opened, as staff at Tinsley House had been covering</p> <p>9 Brook House?</p> <p>10 A. Mmm.</p> <p>11 Q. Are you talking there specifically about the time when</p> <p>12 Tinsley House was refurbished?</p> <p>13 A. Yes.</p> <p>14 Q. Or just in general around that period?</p> <p>15 A. Tinsley House was closed to residents for a period of</p> <p>16 refurbishment from, as I recall, August/September '16</p> <p>17 through to April/May '17. Therefore, there was only</p> <p>18 a small number of staff required at Tinsley House for</p> <p>19 sort of site security measures. So the rest of</p> <p>20 the Tinsley team were deployed to work at Brook House</p> <p>21 over that period.</p> <p>22 Q. Was there an increased number of staff ever raised by</p> <p>23 the director, by Ben Saunders, about the need for there</p> <p>24 to be increased levels of staff?</p> <p>25 A. I don't know if it was raised by Ben. I know we shared</p> <p style="text-align: center;">Page 180</p> |

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| <p>1 concerns at the SMT about how the Brook House staff</p> <p>2 would feel when the Tinsley House staff reverted back to</p> <p>3 Tinsley House. But what Ben did with that information,</p> <p>4 I don't know.</p> <p>5 Q. When the refurbishment stopped and the staff went back</p> <p>6 to Tinsley House, were staffing levels maintained at</p> <p>7 Brook House during that time, after that time?</p> <p>8 A. So the Tinsley House staff had been in addition to the</p> <p>9 Brook House staff. So I think, when Tinsley House</p> <p>10 re-opened, Brook House reverted back to its sort of</p> <p>11 contractual staffing levels, but for the staff on the</p> <p>12 ground, they had had a period of extra support,</p> <p>13 particularly on the wings, that I think, you know, was</p> <p>14 difficult for them to adjust to then going back to what</p> <p>15 was the contractual staffing level for Brook House.</p> <p>16 Q. Were there complaints made about the fact that they</p> <p>17 didn't have as much staff now that Tinsley House had</p> <p>18 gone over?</p> <p>19 A. Yeah. I think they were certainly sharing concerns</p> <p>20 before the Tinsley House staff were going back to</p> <p>21 Tinsley House about how they would cope. But, as</p> <p>22 I think I've said in my statement, you know, it would</p> <p>23 have required a review of the contractual head count at</p> <p>24 Brook House in order to enhance the staffing levels and</p> <p>25 I'm not sure what was done about that, if anything.</p> <p style="text-align: center;">Page 181</p> | <p>1 instead of telling detainees to see a white shirt. DCOs</p> <p>2 are not taking responsibility for managing simple things</p> <p>3 like running out of soap powder and not contacting</p> <p>4 stores."</p> <p>5 In your Verita interview also, paragraph 105,</p> <p>6 <VER000223>, you say you were aware of issues where</p> <p>7 people were not being managed by their DCMs and didn't</p> <p>8 know who their DCM even was, and you don't think enough</p> <p>9 effort is made for DCMs to engage with staff. You also</p> <p>10 say this in your witness statement, paragraph 46, you</p> <p>11 spent -- they spent too long on operational tasks rather</p> <p>12 than broader management -- managerial responsibilities.</p> <p>13 Steve Skitt also raised this in an SMT meeting, and</p> <p>14 you refer to it in your paragraph 147. You say:</p> <p>15 "There were regular employee development reviews and</p> <p>16 general performance reviews that were already in place."</p> <p>17 What exactly are you referring to there?</p> <p>18 A. So G4S had -- they were called EDRs, so employee</p> <p>19 development reviews, so they were a biannual review and</p> <p>20 then an end-of-year performance review with a line</p> <p>21 manager, and I'm aware of those taking place, but, you</p> <p>22 know, I think there's a suggestion in those comments</p> <p>23 that are made in the SMT, and I'm not sure I made all of</p> <p>24 them, it may be the way it's recorded, that DCMs should</p> <p>25 be spending more time supporting and mentoring staff.</p> <p style="text-align: center;">Page 183</p> |
| <p>1 Q. I won't take you to it but there is an SMT meeting</p> <p>2 minutes from 11 August 2017 at <CJS000913>, page 1,</p> <p>3 where Jules Williams, who was residential manager at the</p> <p>4 time, says:</p> <p>5 "Staffing levels on the wings has been a struggle.</p> <p>6 SS [Steve Skitt] said the detail fits but escorts and</p> <p>7 constants had had an impact on staffing ... MB</p> <p>8 [Michelle Brown] said the staffing is stretched and</p> <p>9 managers need to give [more] support ..."</p> <p>10 Do you recall Michelle Brown as saying that?</p> <p>11 A. No, not specifically.</p> <p>12 Q. Do you agree that managers did need to give more support</p> <p>13 at that time?</p> <p>14 A. I don't know what Michelle is alluding to with that</p> <p>15 comment. It is not particularly clear, so I can't offer</p> <p>16 any additional information on that.</p> <p>17 Q. You speak at the next SMT meeting, on 22 September,</p> <p>18 I will read it out, <CJS000918>, page 2. The minutes</p> <p>19 record:</p> <p>20 "SN [you] spoke about issues with staffing levels.</p> <p>21 Discussions around a new mentoring process for new staff</p> <p>22 with the SPOC and pairing up buddies needs to be done</p> <p>23 with good staff. DCMs are so busy managing detainees</p> <p>24 that they are not managing staff, which was mentioned in</p> <p>25 a recent staff forum. Staff need to deal with issues</p> <p style="text-align: center;">Page 182</p> | <p>1 And I think, you know, the comments I've made is that</p> <p>2 sometimes the operation was so fast paced, there is such</p> <p>3 a lot going on, that, you know, they were caught up in</p> <p>4 operational tasks and didn't have, potentially, the time</p> <p>5 and capacity to do that staff support element of</p> <p>6 the role.</p> <p>7 Q. So those EDRs, are you saying that they should have</p> <p>8 happened at the time or is that something that happened</p> <p>9 after the relevant period in response to what happened?</p> <p>10 A. No, they were in place during the relevant period.</p> <p>11 Q. Do you know if they actually ended up happening?</p> <p>12 A. I wouldn't have had oversight of those submitted by</p> <p>13 Brook House managers, but I know they were taking place</p> <p>14 at Tinsley House and I know there was an expectation</p> <p>15 that they would be done. So I can assume they were</p> <p>16 taking place at Brook House but I can't be sure.</p> <p>17 Q. I want to ask you now in some more detail about the</p> <p>18 moving of the staff from Tinsley House to Brook House</p> <p>19 and the contract.</p> <p>20 A. Mmm.</p> <p>21 Q. If we can, please, turn to <INQ000174>, paragraphs 23 to</p> <p>22 25. This is the live transcript record of this hearing</p> <p>23 and in particular Dan Haughton, who gave evidence. If</p> <p>24 we look, please, at pages 23 to 25, and particularly 23,</p> <p>25 and it is internal page 92, so just scroll down, please.</p> <p style="text-align: center;">Page 184</p> |

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| <p>1 He says -- in the question, rather, it says, just 2 halfway down, line 16: 3 "I recall a decision made by Ben Saunders to run 4 staffing levels below the typical head count. This was 5 prior to an upcoming contract renewal. The upcoming 6 contract had a lower number of staff than levels at the 7 time. Therefore, Ben took the decision to not recruit 8 to our target number of staff (but wanted to keep 9 staffing to contractual requirements) on the basis that 10 if G4S retained the contract, Brook House would not be 11 over head count. The decision was financially 12 beneficial, as all savings increased the margin'." 13 If we just go to the next page, please, at the top: 14 "Question: ... Can you help me understand this: do 15 you know when approximately -- I know the bid process is 16 quite long. 17 "Answer: Yes. 18 "Question: When was contract renewal coming up? 19 "Answer: So I think the renewal was in 2018. 20 "Question: Yes. 21 "Answer: So I think a lot of the bid work had been 22 done or was being done, I wasn't massively involved in 23 it. I was made aware that the new bid that we were 24 being asked to -- or that we were bidding for and other 25 people were bidding for was much -- the staffing levels</p> <p style="text-align: center;">Page 185</p> | <p>1 that? 2 "Answer: I don't recall that happening with the 3 Home Office present", and so on. 4 So there Dan Haughton is saying that he had 5 a discussion with Ben Saunders just before the renewal 6 bid in 2008 [sic] in order to essentially deliberately 7 lower the number of staff in order to win the contract. 8 So in order to make it look better, essentially. Was 9 that something that you were aware of? 10 A. Not specifically in relation to contract renewal, but, 11 yes, I was aware of conversations around not recruiting 12 to the full head count but maintaining the required 13 staffing levels over a 24-hour period, which is 14 essentially what Dan is saying here, yes. 15 Q. You said in your Verita interview, and we can bring it 16 in, <VER000223>, and look at page 12, please. At 158, 17 Ms Lampard says: 18 "Tell me about the recruitment and retention issues 19 at Brook House insofar as they have had a knock-on 20 effect at Tinsley. Let me just add a bit of colour to 21 that. There is a suggestion from John Kench that in 22 Ben Saunders' day, anyway, Ben would press John to take 23 staff from Tinsley House to Brook House because the fine 24 regime in relation to Tinsley House is less onerous than 25 it is in relation to Brook House."</p> <p style="text-align: center;">Page 187</p> |
| <p>1 were lower, the level of education and services to 2 residents, such as welfare, was lower. So that's, 3 I think, where a lot of the staffing savings were. So 4 instead of welfare being opened seven days a week, it 5 was only open five days a week ..." 6 And so on. If we just look -- go on to -- scroll 7 up, please, to page 94 -- sorry, 95, at the top there: 8 "Answer: And that fluctuated based on head count. 9 So if the head count in the centre was high, the number 10 of hours that needed to be provided over a 24-hour were 11 higher, and if it was lower, it was lower. So, in 12 effect, you could not have your full head count but 13 still provide your contracted hours." 14 He goes on. 15 "Question: This policy of running the staffing 16 numbers lower in the run-up to the bid, is that an 17 explicit policy by Ben Saunders or was it more of an 18 unspoken kind of gradual plan? 19 "Answer: It was a discussion he had with me that 20 said he wanted me to maintain the contracted hours, but 21 that he wasn't going to recruit to the full head count. 22 "Question: Was the Home Office aware of that? 23 "Answer: I don't know. 24 "Question: Did you ever have a conversation with 25 him in the presence of anyone from the Home Office about</p> <p style="text-align: center;">Page 186</p> | <p>1 You say: 2 "Answer: Yes, that's true. 3 "Question: Do you want to explain some of that? 4 "Answer: Yes. Commercially it is better to have 5 staffing penalties at Tinsley because, frankly, it costs 6 less. A hundred points at Tinsley is, I think, a half 7 to a third of what it would be at Brook." 8 Then if we can please go to paragraph 163, so just 9 further down: 10 "Question: In managing [Brook] House, which is what 11 you do, how often do you find that you are, as it were, 12 compromised or understaffed because you have had to 13 service Brook House as well? 14 "Answer: It has been daily. Not now, because we 15 are in quarantine, so they are not allowed to 16 cross-deploy, which is interesting because they seem to 17 be coping without us." 18 Is that something that happened often, that the 19 staff at Tinsley House would be used at Brook House? 20 A. Yes, I was particularly aware of this at the time 21 because, in managing Tinsley House, I was managing the 22 Tinsley House staff who were feeling increasingly 23 frustrated at being routinely deployed to Brook House. 24 The two centres are different. It's not ideal, for 25 a number of reasons, to have staff that are not based at</p> <p style="text-align: center;">Page 188</p> |

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| <p>1 a centre working at a centre because they are not as</p> <p>2 familiar with the resident population, they are not as</p> <p>3 familiar with some of the protocols. So the</p> <p>4 Tinsley House staff found it quite difficult to sort of,</p> <p>5 you know, on a fairly ad hoc basis, have to work on, you</p> <p>6 know, especially on the wings at Brook House. So they</p> <p>7 were quite vocal about it with me.</p> <p>8 Q. In terms of the commercial benefit, you said in your</p> <p>9 witness statement, echoing what you said in your Verita</p> <p>10 interview, here at paragraph 128 of your witness</p> <p>11 statement:</p> <p>12 "It is difficult to say that a conscious decision</p> <p>13 was taken to deliberately understaff wings."</p> <p>14 If we can just go to, please, page 20 of the same</p> <p>15 document there, your Verita interview, paragraphs 276</p> <p>16 and 277, just scroll down, please, to 276, in the middle</p> <p>17 of the page there:</p> <p>18 "Question: The pressure would be that you might</p> <p>19 have a profile that says three, four on a wing and</p> <p>20 a DCM, but you might in order to attain the profit, say,</p> <p>21 'we will run it at two'?</p> <p>22 "Answer: I know that was what Nathan Ward was</p> <p>23 accusing and I did chuckle because I know that he was in</p> <p>24 a room when those discussions have happened in the past.</p> <p>25 To point the finger was a bit hypocritical, but it was</p> <p style="text-align: center;">Page 189</p> | <p>1 financial penalties?</p> <p>2 A. Yes.</p> <p>3 Q. Do you know if the Home Office was aware that these</p> <p>4 figures were being manipulated in that way?</p> <p>5 A. If I recall, the staffing measurement at the time was</p> <p>6 a set number of staff on duty over a 24-hour period, so</p> <p>7 provided that was being met, which you could do through</p> <p>8 cross deployment or overtime, that was the level of</p> <p>9 the Home Office's sort of scrutiny around that, which,</p> <p>10 you know, isn't the case now. There are, I think, three</p> <p>11 separate KPIs -- sorry, key performance indicators -- on</p> <p>12 staffing in the current contract. One of them is as was</p> <p>13 with the correct number of staff over a 24-hour period,</p> <p>14 but there's also one around total head count. So, you</p> <p>15 know, you're not able to do that now. The Home Office</p> <p>16 would see that.</p> <p>17 Q. You said that you raised concerns in relation to</p> <p>18 difficulties of overstaffing the more operational</p> <p>19 issues, but did you raise any concerns about the</p> <p>20 lawfulness or the ethics of there being a deliberate</p> <p>21 understaffing in terms of -- in order to make profits?</p> <p>22 A. I don't recall anything specific, no. Yes, I believe it</p> <p>23 was happening. I could see the impact of it at</p> <p>24 Tinsley House. But I don't -- I didn't have</p> <p>25 conversations around it to the detail that Dan Haughton</p> <p style="text-align: center;">Page 191</p> |
| <p>1 factually accurate. Our biggest cost as a people</p> <p>2 business is staff, and if you aren't employing them,</p> <p>3 then that --</p> <p>4 "Question: Therefore, in constructing the bid there</p> <p>5 is no profit built in?</p> <p>6 "Answer: There is, but it is small."</p> <p>7 So you said there, "but it [is] factually accurate".</p> <p>8 So are you saying there, then, in order to attain</p> <p>9 profit, they did run the centre as understaffed,</p> <p>10 essentially?</p> <p>11 A. I believe so, yes.</p> <p>12 Q. As head of Tinsley House at the time, were you involved</p> <p>13 in this decision making?</p> <p>14 A. No.</p> <p>15 Q. Even though it was the moving of Tinsley staff to</p> <p>16 Brook House that facilitated this?</p> <p>17 A. Yes, it was, and I raised my concerns about that and</p> <p>18 I raised my concerns about how that would potentially</p> <p>19 impact on our retention at Tinsley House, because</p> <p>20 I didn't think it was fair on the staff and I didn't</p> <p>21 think it was an ideal way to operate Brook House either.</p> <p>22 But that -- it wasn't my decision to do that. I was</p> <p>23 just trying to manage the consequences of it at Tinsley.</p> <p>24 Q. Do you agree that this is a manipulation of the true</p> <p>25 staffing figures done by G4S in order to reduce the</p> <p style="text-align: center;">Page 190</p> | <p>1 did -- he was managing staffing levels at the time, so</p> <p>2 across the two centres. So he would have had, you know,</p> <p>3 more of those conversations with Ben. It certainly felt</p> <p>4 to me like that was what was happening, but I'm not sure</p> <p>5 how explicit the knowledge I had at the time was, if</p> <p>6 that makes sense.</p> <p>7 Q. You said that you could see what was happening and how</p> <p>8 it was affecting people on the ground. I assume that</p> <p>9 also, as you said in your witness statement at</p> <p>10 paragraph 125, lower staffing impacted on the welfare</p> <p>11 and safety of staff and residents?</p> <p>12 A. Yes, it could do, yes.</p> <p>13 Q. Do you think, then, that this is evidence of</p> <p>14 prioritising profit by G4S over detainee welfare?</p> <p>15 A. Yes.</p> <p>16 Q. I want to now turn to Michelle Brown's witness</p> <p>17 statement, please. <INQ000164>. It is page 52,</p> <p>18 paragraph 100. Just turn over the page -- in fact, just</p> <p>19 at the end of the page, she says:</p> <p>20 "Upon taking on the role of business intelligence</p> <p>21 manager in 2019, I was pressured not to declare audit</p> <p>22 failings to the Home Office or wider G4S going back as</p> <p>23 far as 10 years that had historically been signed off as</p> <p>24 'compliant'."</p> <p>25 Michelle Brown describes being put in an untenable</p> <p style="text-align: center;">Page 192</p> |

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| <p>1 position, "as I was not prepared to put my name to</p> <p>2 falsifying documents which resulted in accusations from</p> <p>3 Sarah Newland, my line manager at the time, of not</p> <p>4 delivering in my role and being awkward."</p> <p>5 Did you put pressure on Michelle Brown in this way?</p> <p>6 A. No, I don't know what Michelle is referring to here.</p> <p>7 The KPIs associated with audits at the time were to not</p> <p>8 complete them as per the schedule shared with the</p> <p>9 Home Office and not to address non-compliances within</p> <p>10 a certain period. There wasn't a penalty for having</p> <p>11 something that was non-compliance as long as you</p> <p>12 identified it and put a rectification plan in place for</p> <p>13 it. This is post Panorama and the Home Office had</p> <p>14 expanded their compliance team at the site. So we would</p> <p>15 submit a completed audit along with all of the evidence</p> <p>16 and they would carry out their own quality assurance</p> <p>17 checks. So it would be fruitless trying to conceal</p> <p>18 something because they would want to satisfy themselves</p> <p>19 that all was as required.</p> <p>20 At this time, I am aware of some other issues that</p> <p>21 were impacting on Michelle, and I did have to raise her</p> <p>22 performance with her. I had complaints from the</p> <p>23 Home Office manager about the quality of some of</p> <p>24 the audits that she had quality assured herself and</p> <p>25 I had cause to raise that with her. But I didn't try</p> <p style="text-align: center;">Page 193</p> | <p>1 Q. And who else?</p> <p>2 A. I think the -- I had less experience of Stacie Dean, but</p> <p>3 I think elements of her behaviour at times indicated the</p> <p>4 same.</p> <p>5 Q. What effect do you think that fractured, confrontational</p> <p>6 and mistrustful culture on the SMT had on staff lower</p> <p>7 down the chain, so DCMs and DCOs?</p> <p>8 A. Well, we talked previously about how culture has to come</p> <p>9 from the top, so if it's fractured from the top, that's</p> <p>10 going to flow down through the managers to the staff.</p> <p>11 It doesn't create a healthy environment. If they don't</p> <p>12 trust -- if an SMT doesn't trust each other, then how</p> <p>13 can you expect to be trusted by staff?</p> <p>14 Q. Did you see any manifestations of that within the</p> <p>15 behaviour of DCMs or DCOs?</p> <p>16 A. I think there was -- there were quite a lot of sort of</p> <p>17 grievances raised by staff at the time as well, some of</p> <p>18 which I was asked to deal with in terms of</p> <p>19 investigations. There was just, I think, a general</p> <p>20 feeling that people didn't trust each other, or that</p> <p>21 staff didn't trust managers -- not every manager, that</p> <p>22 would be unfair. I think there were people that were</p> <p>23 trusted, but there was a general theme of mistrust,</p> <p>24 I think.</p> <p>25 Q. What effect, if any, do you think that had on the care</p> <p style="text-align: center;">Page 195</p> |
| <p>1 and get her to falsify documents. That wasn't the case.</p> <p>2 MS TOWNSHEND: Chair, just noticing the time, I think that</p> <p>3 I probably have around 20 more minutes of questioning.</p> <p>4 I wonder whether you would consider sitting a bit later</p> <p>5 than normal today?</p> <p>6 THE CHAIR: I think that's fine. And probably preferable to</p> <p>7 having to ask you to come back tomorrow morning, if you</p> <p>8 are okay to continue for another 20 minutes and that's</p> <p>9 okay with the transcribers for another 20 minutes.</p> <p>10 MS TOWNSHEND: I want to turn now to staff culture. You</p> <p>11 said in your witness statement, paragraph 48:</p> <p>12 "During the relevant period, I would describe the</p> <p>13 culture amongst the SMT as being fractured,</p> <p>14 confrontational and mistrustful. I felt that certain</p> <p>15 members of the SMT focused on their performance</p> <p>16 progression rather than that of the team. There were</p> <p>17 trusting relationships between individuals within the</p> <p>18 SMT but there was a lack of trust within the team as</p> <p>19 a whole."</p> <p>20 Who was focused on their own performance</p> <p>21 progression, as you suggested there?</p> <p>22 A. I think there were a couple of individuals that felt</p> <p>23 like they were performing above others and wanted to</p> <p>24 highlight that and, yeah, Michelle Brown would have been</p> <p>25 one of them.</p> <p style="text-align: center;">Page 194</p> | <p>1 of detained persons?</p> <p>2 A. Well, you know, I think it's -- if people are concerned</p> <p>3 about trust, they may not come to you with issues that</p> <p>4 they're particularly concerned about.</p> <p>5 Q. So could that have affected detained persons raising</p> <p>6 complaints against staff?</p> <p>7 A. I don't know if I can overly comment on whether it would</p> <p>8 have affected detained persons. I think it may have</p> <p>9 prevented staff coming forward with issues, if they felt</p> <p>10 that they weren't going to be listened to or trusted.</p> <p>11 Q. Can you think of any specific examples of where that</p> <p>12 might have been the case?</p> <p>13 A. I just think, you know, some of the grievances I dealt</p> <p>14 with, you know, I upheld elements of them for the staff</p> <p>15 because I felt that things hadn't been managed</p> <p>16 particularly well, and I could understand why that staff</p> <p>17 member would have felt aggrieved at the approach that</p> <p>18 was taken.</p> <p>19 Q. But, in terms of the care that that was then -- the</p> <p>20 effect on the care that they provided a detained person,</p> <p>21 can you see the line of causation there?</p> <p>22 A. Yes.</p> <p>23 Q. Was there any specific example that you can think that</p> <p>24 happened?</p> <p>25 A. No. I think the majority of cases I dealt with were</p> <p style="text-align: center;">Page 196</p> |

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| <p>1 staff-on-staff complaints. Other than the disciplinary</p> <p>2 hearings that I chaired after the Panorama programme,</p> <p>3 I think the majority of them were about staff -- or</p> <p>4 staff about managers rather than involving detained</p> <p>5 persons.</p> <p>6 Q. But you've suggested there that there then created</p> <p>7 perhaps a culture where -- a mistrustful culture --</p> <p>8 A. Yes.</p> <p>9 Q. -- which meant that perhaps detained persons weren't</p> <p>10 able to raise complaints against staff?</p> <p>11 A. Yes, potentially. I didn't have much oversight of</p> <p>12 detained persons' complaints at that time; only if they</p> <p>13 were obviously at Tinsley House. So I can't make that</p> <p>14 direct correlation. But, yes, I would concur in</p> <p>15 principle that that could have happened.</p> <p>16 Q. In terms of staff attitudes towards detained persons,</p> <p>17 I want to first start with staff attitudes about C&R,</p> <p>18 control and restraint.</p> <p>19 A. Yes.</p> <p>20 Q. If I can ask Zaynab to bring up, please, the transcript</p> <p>21 of Owen Syred's evidence, <INQ000101>, page 26, please.</p> <p>22 it is page 102 within that. He says -- the question</p> <p>23 was:</p> <p>24 "Question: Were you able, whilst you were at</p> <p>25 Brook House, to try and combat this kind of culture?</p> <p style="text-align: center;">Page 197</p> | <p>1 I do -- I can't recall specifically what I did, but</p> <p>2 I imagine I would have raised it with the team and said,</p> <p>3 "This is something we need to be aware of, this is</p> <p>4 something that's come from a member of staff", and that</p> <p>5 sort of attitude is not tolerated. There is a number of</p> <p>6 measures in place. The control and restraint training,</p> <p>7 if we think that people are enjoying it too much or</p> <p>8 not -- you know, not seeing it for what it is, then we</p> <p>9 will challenge that. The C&R scenarios for new staff</p> <p>10 are based around testing their levels of response, so if</p> <p>11 somebody is calm, then they need to demonstrate that</p> <p>12 they will not just proceed with use of force. You know,</p> <p>13 DC rule 41 is about not provoking detained persons and</p> <p>14 I dealt with a case relatively recently where that came</p> <p>15 to light. That individual's, you know, contract was</p> <p>16 terminated as a result of that. So that's not a culture</p> <p>17 that we are tolerant of.</p> <p>18 Q. What happened with that individual? What was said that</p> <p>19 was provoking? What was the incident? Could you</p> <p>20 describe it very briefly, please?</p> <p>21 A. Yes, so there was a relatively minor altercation between</p> <p>22 a detained person and a member of staff over a games</p> <p>23 console controller and the detained person became quite</p> <p>24 confrontational and, instead of taking himself away from</p> <p>25 that situation, which he could have done, he sort of</p> <p style="text-align: center;">Page 199</p> |
| <p>1 "Answer: Later on, I was listened to. I'll give</p> <p>2 you an example. Probably 2019, I had two members of</p> <p>3 staff within two weeks bragging about doing C&R. One</p> <p>4 said, 'I love doing C&R, I love it'. I pulled him up on</p> <p>5 my own and said, "I don't want to hear that. You should</p> <p>6 know better than that". Another one said it in the</p> <p>7 staff room. Again, I said it and I warned them about --</p> <p>8 I spoke to Sarah Newland, the deputy director, about it.</p> <p>9 I didn't mention who it was. I just said 'You need to</p> <p>10 be aware this could quite easily go back to' -- it's --</p> <p>11 what's the word? It's -- if somebody is like a virus,</p> <p>12 it creeps back. So just to be aware that this</p> <p>13 attitude -- and I've challenged it. So effectively,</p> <p>14 I dealt with it, but I didn't want -- again, it would be</p> <p>15 quite obvious it came -- if I'd have reported it, it had</p> <p>16 come from me."</p> <p>17 I assume you would agree bragging about, and</p> <p>18 enjoying, C&R is a problem?</p> <p>19 A. Mmm.</p> <p>20 Q. It is similar to what we saw in many clips in Panorama.</p> <p>21 What steps did you take, as it was suggested here, in</p> <p>22 order to combat that?</p> <p>23 A. Well, I think we can see here that Owen did not want to</p> <p>24 share the names of those individuals with me. I do</p> <p>25 remember him coming to see me with some concerns, and</p> <p style="text-align: center;">Page 198</p> | <p>1 followed the detained person and carried on the</p> <p>2 argument, which resulted in a, you know, relatively</p> <p>3 minor use of force. It was a push, but it was</p> <p>4 ascertained that he should not have behaved in that way.</p> <p>5 He could have removed himself from that incident rather</p> <p>6 than continue to pursue that argument with the detained</p> <p>7 person.</p> <p>8 Q. I see there that Owen Syred describes it "coming back</p> <p>9 like a virus if it's not challenged". You have just</p> <p>10 mentioned there a particular incident which you have</p> <p>11 dealt with very recently. Are the same attitudes like</p> <p>12 that about loving C&R, are they still apparent now</p> <p>13 within staff, do you think?</p> <p>14 A. No. Like I said, you know, that was an isolated</p> <p>15 incident and that was dealt with swiftly when it came to</p> <p>16 our attention, and, you know, that's not -- again, you</p> <p>17 know, I go back to the three and three tracker when we</p> <p>18 look at where people have been involved in uses of</p> <p>19 force, if it's three or more in a rolling three-month</p> <p>20 period, then we do look at the circumstances and whether</p> <p>21 they are putting themselves in situations where they are</p> <p>22 more freely able to use force, because that is not what</p> <p>23 we encourage at all.</p> <p>24 Q. I assume what you mean there is unplanned uses of force</p> <p>25 rather than planned, because people could be picked to</p> <p style="text-align: center;">Page 200</p> |

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| <p>1 do the same use of force --</p> <p>2 A. Yes, spontaneous incidents are more of a concern, if it</p> <p>3 is the same individuals getting involved, yes.</p> <p>4 Q. I want to ask you now about staff attitudes towards</p> <p>5 disruptive or manipulative and mentally ill detained</p> <p>6 persons. I will, just for the purposes of time, read</p> <p>7 this out, if that is okay. It is your Verita interview,</p> <p>8 <VER000223>, page 14, paragraph 193, tab 4. Your</p> <p>9 interview in March 2018, you describe a problem with</p> <p>10 desensitisation of staff at Brook House and people not</p> <p>11 being able to understand why detainees behave the way</p> <p>12 they do, or not wanting to understand. Can you explain</p> <p>13 what you mean by "desensitisation"?</p> <p>14 A. Yes. I think that certainly my approach is, if somebody</p> <p>15 is displaying a certain behaviour, it's trying to</p> <p>16 understand why and what the triggers are for that</p> <p>17 behaviour, so we can track it back to the root cause and</p> <p>18 manage that rather than just managing the effect, you</p> <p>19 know, which may be some sort of disruptive or frustrated</p> <p>20 behaviour. I think, at the -- you know, during the</p> <p>21 relevant period, there were high numbers of detained</p> <p>22 persons, high numbers of time-served foreign national</p> <p>23 offenders, high rate of incidents, and I think that</p> <p>24 it -- from the staff's point of view, you know, I was</p> <p>25 doing one weekend in six and I could feel it sometimes</p> <p style="text-align: center;">Page 201</p> | <p>1 mental health problems, do you think?</p> <p>2 A. No. You know, I think I -- as I've said, I was there</p> <p>3 relatively infrequently, so, you know, I don't think</p> <p>4 I had the same experience as the staff and the managers</p> <p>5 who were operational at Brook House. You know, both due</p> <p>6 to my role when I was there and the frequency that I was</p> <p>7 there.</p> <p>8 I did deal with individuals who I felt tried to</p> <p>9 manipulate the system, yes.</p> <p>10 Q. What did you mean by officers going in "heavy-handed"?</p> <p>11 Are you talking about excessive force used on detained</p> <p>12 persons in that context?</p> <p>13 A. I don't -- sorry, I don't know. I'm not sure. I don't</p> <p>14 recall making that comment. I'm not sure what I meant.</p> <p>15 Q. Shall we just go to your interview so you can see the</p> <p>16 context, <VER000223>, page 14. Paragraph 194. You</p> <p>17 said:</p> <p>18 "However, in order to be able to manage someone's</p> <p>19 behaviour, you have to understand it, but I don't know</p> <p>20 how much we do to understand it other than just write</p> <p>21 them off as disruptive. Then we almost perpetuate the</p> <p>22 issue because these individuals become notorious, and</p> <p>23 then we are almost so nervous about dealing with them</p> <p>24 that we go in heavy-handed. That just adds fuel to</p> <p>25 fire."</p> <p style="text-align: center;">Page 203</p> |
| <p>1 that it was like Groundhog Day, it was just response</p> <p>2 after response. I think for the staff, they are running</p> <p>3 to these responses, they are dealing with, you know,</p> <p>4 sometimes violence, sometimes self-harm, sometimes</p> <p>5 concerted indiscipline, and the pace of that was such</p> <p>6 that I don't think, you know, they could sufficiently</p> <p>7 sort of pause and reflect on that. I think that that --</p> <p>8 that's what I mean by "desensitisation". It's, "This is</p> <p>9 another fight, another self-harm".</p> <p>10 Q. Did that affect the way that staff dealt with people who</p> <p>11 were self-harming, do you think?</p> <p>12 A. Well, yes. I think we saw evidence of that in the</p> <p>13 documentary, yes.</p> <p>14 Q. Also in your Verita interview, in the following</p> <p>15 paragraph, paragraph 194, you suggest that staff were</p> <p>16 unable to understand the disruptive behaviour and that</p> <p>17 they perpetuate the issue, as they are so nervous about</p> <p>18 dealing with such detainees that they go in heavy handed</p> <p>19 and that just adds fuel to the fire.</p> <p>20 Again, in your Aitken interview, <INQ000078> page 3,</p> <p>21 tab 41, you talk about self-harm being used as</p> <p>22 manipulation, and that there was -- you use the</p> <p>23 expression "boy who cried wolf", meaning it can "erode</p> <p>24 your ability to identify when it's genuine". Were you</p> <p>25 at all desensitised to self-harm and detainees with</p> <p style="text-align: center;">Page 202</p> | <p>1 I think you're talking specifically about D87?</p> <p>2 A. D87, yes. Yes, I am. And so I don't -- when I say</p> <p>3 "heavy-handed", I don't think I'm referring to use of</p> <p>4 force. I'm referring to his management whilst he was on</p> <p>5 rule 40 conditions at Brook House.</p> <p>6 Q. We are going to come to that a little later. Do you</p> <p>7 think that that kind of attitude about not believing</p> <p>8 detainees when they were self-harming contributed to</p> <p>9 a culture where detainees weren't believed and mentally</p> <p>10 ill detainees ended up getting worse because of it?</p> <p>11 A. No. I think there were some examples of where</p> <p>12 vulnerable individuals, both because of self-harm and</p> <p>13 because of mental illness, were -- you know, were cared</p> <p>14 for with, you know, sometimes, you know, very</p> <p>15 compassionate staff. I think there were pockets of</p> <p>16 the behaviour that we're describing, but I think, you</p> <p>17 know, a lot of the staff did their best to look after</p> <p>18 people who, you know, by the very nature of their</p> <p>19 detention, were vulnerable.</p> <p>20 Q. But is there a risk in not believing some detainees --</p> <p>21 a boy who cried wolf -- that you miss cases of genuine</p> <p>22 self-harm and suicide?</p> <p>23 A. Yes, there is a risk of that, yes.</p> <p>24 Q. Therefore, isn't the better approach to assume that</p> <p>25 somebody is telling the truth and then care for them</p> <p style="text-align: center;">Page 204</p> |

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| | |
|--|--|
| <p>1 appropriately?</p> <p>2 A. Yeah, I think there were examples of individuals who</p> <p>3 were quite explicit about the reasons why they were</p> <p>4 claiming to self-harm. So there were examples of it.</p> <p>5 But they were few and far between.</p> <p>6 Q. So do you think that attitude of there being a problem</p> <p>7 with the boy who cried wolf is actually not very</p> <p>8 helpful?</p> <p>9 A. No, it's not helpful, and you do need to take those</p> <p>10 threats seriously and you need to manage them</p> <p>11 appropriately.</p> <p>12 Q. We have heard evidence from Steve Loughton,</p> <p>13 Shane Farrell, Steve Dix and Stewart Povey-Meier --</p> <p>14 I won't bring up all of the references to their inquiry</p> <p>15 evidence, but we heard from them that they couldn't</p> <p>16 distinguish between detained persons behaving in ways</p> <p>17 which were due to their mental illness and whose who</p> <p>18 were being deliberately disruptive. They said that they</p> <p>19 still haven't had proper training from Serco on it,</p> <p>20 despite the fact that they are now in senior roles --</p> <p>21 two assistant directors and two DOMs, I believe. Do you</p> <p>22 know whether there has been any training in this</p> <p>23 respect?</p> <p>24 A. So there is -- mental health awareness training is</p> <p>25 delivered on the initial training course and as part of</p> <p style="text-align: center;">Page 205</p> | <p>1 and then that would be picked up by the mental health</p> <p>2 team that are part of the PPG -- sorry, the Practice</p> <p>3 Plus Group healthcare provision at Gatwick.</p> <p>4 Q. It does appear that it's currently an issue, given those</p> <p>5 four fairly senior people still working at Serco and</p> <p>6 Brook House, they still think that's a problem. Do you</p> <p>7 accept that?</p> <p>8 A. That might be their view. I wouldn't necessarily agree</p> <p>9 with it. I think there are -- you know, as I've</p> <p>10 described, there are things in place to assist staff</p> <p>11 with identifying people with mental illness or flagging</p> <p>12 where there may be concerns. You know, they're not</p> <p>13 mental health professionals, so, you know, we have to</p> <p>14 consider professional boundaries, and that's where we</p> <p>15 would refer to the clinical provision from PPG.</p> <p>16 Q. In Michelle Brown's witness statement, <INQ000164></p> <p>17 page 3, paragraph 72, she stated that at a particular</p> <p>18 time in 2020, she had done a case review for a detained</p> <p>19 person on constant supervision when she was duty</p> <p>20 director, and she said that senior Serco staff -- so you</p> <p>21 and Mr Hewer, Steve Hewer -- she said:</p> <p>22 "... I remember saying to them, 'I have just sat on</p> <p>23 one of the saddest case reviews ever, the entire panel</p> <p>24 was moved', and I recall Steve Hewer replying, 'Well,</p> <p>25 what lies is he telling you then' - I was shocked at</p> <p style="text-align: center;">Page 207</p> |
| <p>1 the early staff refresher. That includes the</p> <p>2 identification of mental illness and, you know, what to</p> <p>3 do if you do think somebody is suffering.</p> <p>4 We have mental health first aiders now on contract,</p> <p>5 and we are looking to train our own instructors so that</p> <p>6 we can widen the number of staff who have access to that</p> <p>7 training. Serco is also investing in virtual reality</p> <p>8 mental health training for staff as well,</p> <p>9 scenario-based, through VR.</p> <p>10 Q. Do you think currently that there is adequate training</p> <p>11 for officers to recognise the symptoms of mental illness</p> <p>12 and not treating detainees simply as disruptive?</p> <p>13 A. Yes, so I think when we did the mental health first aid</p> <p>14 training, which is more than what's delivered as part of</p> <p>15 the initial training course, we focused on staff members</p> <p>16 that work in reception and on E wing, so that sort of</p> <p>17 early identification of issues and where our more</p> <p>18 vulnerable residents will reside.</p> <p>19 There is also a weekly vulnerable adults meeting</p> <p>20 which is chaired by Dan Houghton in his role as AD</p> <p>21 safeguarding, and that brings together staff from across</p> <p>22 the centre, from across the discipline, so including</p> <p>23 DCOs that work, you know, front-line with residents, and</p> <p>24 that enables anybody to raise a concern about</p> <p>25 a particular individual that they feel may be suffering,</p> <p style="text-align: center;">Page 206</p> | <p>1 this comment, the sheer lack of interest or compassion</p> <p>2 and denial of an individual's trauma."</p> <p>3 Do you remember Steve Hewer saying that?</p> <p>4 A. No. No, and it is not a comment I would readily</p> <p>5 associate with him either.</p> <p>6 Q. I want to ask you about a particular incident that</p> <p>7 happened on 14 April 2017, which is a protest in D wing</p> <p>8 courtyard. Again, I won't bring up the form. I was</p> <p>9 going to bring up an incident report by</p> <p>10 DCM Steve Loughton, but essentially what happened -- you</p> <p>11 describe this in your witness statement as well at</p> <p>12 paragraph 98 -- is, you attended as a silver commander,</p> <p>13 so second in charge in terms of serious incidents --</p> <p>14 A. Yes.</p> <p>15 Q. -- to manage -- you attended at Brook House to manage</p> <p>16 the incident where many residents, I think 30 to</p> <p>17 40 residents, had gathered on the D wing courtyard in</p> <p>18 the evening, and they had come and protested, but by the</p> <p>19 time you'd in fact arrived at Brook House the incident</p> <p>20 essentially was over.</p> <p>21 A. Mmm.</p> <p>22 Q. But during this time also there was a detainee, D2045,</p> <p>23 that had a seizure, and you were managing from afar,</p> <p>24 I believe, a controlled evacuation of that incident; is</p> <p>25 that right?</p> <p style="text-align: center;">Page 208</p> |

| | |
|--|--|
| <p>1 A. No. Forgive me, I don't know if two incidents have 2 become confused. I definitely remember having to attend 3 for a courtyard protest that was short lived, because by 4 the time I'd driven the sort of 15 or 20 minutes from 5 where I was to the centre, I attended the command suite 6 and Steve Loughton said to me, "They have all just come 7 in", so I do recall that, but I don't recall the second 8 element that you have described there.</p> <p>9 Q. Perhaps that's not relevant, in any case. It is in -- 10 within Steve Loughton's incident report.</p> <p>11 Do you remember that once the inciters, in inverted 12 commas, of the protest had come off the courtyard that 13 they were put onto rule 40?</p> <p>14 A. No.</p> <p>15 Q. You don't remember that they were put onto rule 40?</p> <p>16 A. Not specifically, no.</p> <p>17 Q. So Sean Sayers gave evidence in relation to this. In 18 fact, let's bring it up, <INQ000168>, pages 32 to 33. 19 Page 33, please. It is little page 131. At the top 20 there, line 8.</p> <p>21 "Question: Do you remember, trying to think back to 22 this situation, were people, including D2497, being 23 moved to CSU to punish them for their involvement in the 24 protest?</p> <p>25 "Answer: The use of CSU, and even E wing, it wasn't</p> <p style="text-align: center;">Page 209</p> | <p>1 would go down and engage with them and try and 2 understand what was driving it. A lot of the time, it 3 was around Home Office decisions, which, you know, as 4 the contractor, weren't within our gift to resolve, but, 5 you know, we'd listen to them, we'd make commitments to 6 take their concerns to the Home Office, if that's indeed 7 what it did involve.</p> <p>8 Q. Were detained persons involved in protests routinely put 9 on rule 40?</p> <p>10 A. Not as a result of something relatively passive like 11 that, no. I mean, I think the incident I dealt with, 12 there was, you know, way too many for us to physically 13 have accommodated them on rule 40. And what was the 14 point? If they're already frustrated, you know, we 15 would only exacerbate that by placing them on rule 40 16 conditions as a result of raising their concerns.</p> <p>17 Q. Sean Sayers said that it would have been a manager, 18 possibly someone on the SMT, who would have authorised 19 rule 40 in relation to that protest. Were you the 20 member of the SMT who authorised that rule 40?</p> <p>21 A. I don't recall anybody going on rule 40 as a result of 22 that incident.</p> <p>23 Q. In general, as you've said, there were times, though, 24 where there were protestors who were put on rule 40; is 25 that what your evidence is?</p> <p style="text-align: center;">Page 211</p> |
| <p>1 a decision that we made. We were instructed to take 2 people there. So whoever made that decision, it wasn't 3 me.</p> <p>4 "Question: Would that have been your manager, 5 Steve Dix?</p> <p>6 "Answer: Manager or, if there was any SMT on site 7 at the time, then it would have been one of them. But 8 we never made a decision to take somebody to CSU."</p> <p>9 Just looking at the protest itself, do you remember 10 what the protest was about?</p> <p>11 A. No.</p> <p>12 Q. Do you remember it being clear at the time that there 13 was something that was being protested about 14 specifically -- I don't know, food, for example, or 15 indefinite detention, whatever it might be?</p> <p>16 A. I honestly don't recall the reason for them protesting. 17 I remember getting the phone call and them saying that 18 there was a relatively large group of I think it was 19 Albanian residents on a courtyard that didn't want to 20 come in. I remember making my way in and, literally, as 21 I got there, they'd come in, so it was a relatively sort 22 of low-level incident, as I recall it.</p> <p>23 Q. Did you consider that detained persons had a right to 24 protest at Brook House?</p> <p>25 A. Yes, it wasn't uncommon that they did. You know, staff</p> <p style="text-align: center;">Page 210</p> | <p>1 A. Sorry, that specific courtyard incident, like I say, 2 I don't recall any conversations about anybody going on 3 rule 40 as a result of it. They'd come in, they'd had 4 their say; you know, the incident was dealt with.</p> <p>5 In terms of who authorised the use of rule 40, it 6 would have sat at the duty director level for something 7 that wasn't as a result of a spontaneous incident. So 8 rule 40 enables the contractor to take urgent action, 9 you know, as a result of perhaps a physical fight, but 10 any planned use of it that wasn't sort of in urgent 11 circumstances had to be agreed with the Home Office. So 12 that would usually be done at the duty director level, 13 yes.</p> <p>14 Q. I want to ask you, almost finally, about the treatment 15 of D87, which we touched on earlier. You said in your 16 Verita interview -- I won't bring it up for time 17 purposes, but <VER000223>, pages 13 to 14 -- that D87 18 was manipulative, that he'd come from prison for 19 removal, but if the removal had failed that he would 20 have to come back to prison.</p> <p>21 A. Yes.</p> <p>22 Q. And that he was potentially disruptive and he would 23 often threaten to go. He was under constant supervision 24 because he knew that you wouldn't transfer him back to 25 prison, and so he was essentially manipulating the</p> <p style="text-align: center;">Page 212</p> |

1 system because he didn't want to go back.
 2 **A. Mmm.**
 3 Q. In your witness statement, at paragraphs 62 to 64, you
 4 said there was a lengthy period of rule 40 -- he was
 5 on a lengthy period of rule 40 due to threats he made to
 6 cause disruption. When you say "lengthy period", do you
 7 know how long that was?
 8 **A. No. No, I'm sorry, I don't recall.**
 9 Q. Was it a matter of days or weeks or how long?
 10 **A. No. I think it would have been nearer weeks than days.**
 11 Q. You say "weeks"; up to a month?
 12 **A. I honestly can't say. I do remember dealing with D87**
 13 **when I was duty director one weekend, and I do recall**
 14 **him voicing his frustration at the length of time he had**
 15 **been on rule 40, but I couldn't give you a specific**
 16 **timeframe, I'm afraid.**
 17 Q. You said in your Verita interview that "we restricted
 18 his regime to the point where, he was a big man and he
 19 was in that little room on rule 40 for a protracted
 20 amount of time because of the potential risk he posed
 21 and every day was a long and uncomfortable debate with
 22 a very frustrated individual who was saying, 'All right,
 23 I've made a few comments, but I actually haven't done
 24 anything and you are still holding me here'. Some of it
 25 would be, '[Redacted], if you come off the constant

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1 supervision, we can transfer you somewhere where you can
 2 have more of a regime'.
 3 THE CHAIR: Ms Townshend, sorry, I think there might have
 4 been an inadvertent restriction breach.
 5 MS TOWNSHEND: I'm so sorry. I hadn't noticed I said that.
 6 THE CHAIR: That's okay. We will cut the feed.
 7 MS TOWNSHEND: I inadvertently said the detainee's name, so
 8 we just have to pause a minute.
 9 THE CHAIR: Just while we pause, how long do we think?
 10 MS TOWNSHEND: Just a couple of minutes.
 11 There is a general restriction order, but I would
 12 ask for a specific restriction order to be made in
 13 particular over that detainee, please.
 14 THE CHAIR: Thank you. Indeed. Happy to do so.
 15 MS TOWNSHEND: Apologies, chair.
 16 "... it would be, 'D87, if you come off the constant
 17 supervision, then we can transfer you somewhere where
 18 you can have more of a regime'. Don't get me wrong, it
 19 can work both ways, but if you mention D87, that we made
 20 a decision to move him from E wing to the CSU, we would
 21 end up having to restrain him to do it. He was a big
 22 man so he injured some staff and, before you knew it,
 23 everyone was terrified of dealing with D87."
 24 You said that he was frustrated and it was difficult
 25 to ascertain if his threats were credible. What threats

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1 were those?
 2 **A. I don't know whether he'd made threats to sort of --**
 3 **possibly to take staff hostage or to cause damage to the**
 4 **centre. It was something of that nature.**
 5 Q. You said in your witness statement, at paragraph 62 to
 6 64, that no incremental steps had been taken and so he
 7 was subjected to the strictest regime. Why hadn't those
 8 incremental steps been taken, do you know?
 9 **A. I don't know. I can only assume that people felt that**
 10 **he may carry out those threats. When I dealt with him,**
 11 **his regime had already been put in place. So my role as**
 12 **the duty director would be the daily review. So I would**
 13 **go and see any individual that was on rule 40.**
 14 **Sometimes the decision was mine about whether they would**
 15 **remain on rule 40 or not, but in other cases, they had**
 16 **already been extended for a period, so I would just be**
 17 **doing the daily review, which is what I recall with D87,**
 18 **and it was a lengthy conversation. He felt he was being**
 19 **treated unfairly. I specifically remember he was asking**
 20 **to go to the chapel when I dealt with him, but that**
 21 **wasn't part of the regime that had been put in place for**
 22 **him, which is what I had to explain to him.**
 23 Q. As duty director, could you not have changed that
 24 management of rule 40?
 25 **A. The regime had been put in place for D87 by the**

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1 **Brook House management team, so I -- if I had made**
 2 **changes to that and he had carried out those threats,**
 3 **then that responsibility would have sat solely with me**
 4 **and, you know, I did have concerns about whether people**
 5 **would be -- whether their safety would be compromised if**
 6 **I'd have done that.**
 7 Q. Finally, I want to ask you a final question about staff
 8 culture. You have made, in your Verita interview,
 9 criticisms of Steve Skitt and Dan Haughton. You say of
 10 Steve Skitt that he was ex-military -- that he said --
 11 or you believe that he thought, rather, that ex-military
 12 police and prison guards make good DCMs, and that you
 13 were concerned that he got the deputy director role
 14 because he was a part of an old boys' network.
 15 **A. Mmm.**
 16 Q. You also described Dan Haughton as lazy and too easy to
 17 please Steve Skitt. We know that both Haughton and
 18 Skitt are still members of the SMT at Serco. They are
 19 both assistant directors.
 20 **A. Yes.**
 21 Q. And that Skitt is an assistant director of operations,
 22 which he describes as managing the day-to-day operations
 23 of Brook House, so he clearly has a significant role
 24 over operations.
 25 **A. Mmm.**

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54 (Pages 213 to 216)

1 Q. Does that concern you, given these individuals are still
2 a part of the SMT and setting the culture and tone of
3 the centre?
4 A. No. I think the views I offered at the time were
5 obviously some time ago now and based on limited
6 interaction with those individuals in my role at
7 Tinsley House.
8 I think, you know, Dan -- Dan is quite laid back,
9 but I -- you know, I have a different view of Dan now.
10 I think he lacked confidence at the time and was,
11 you know, concerned at challenging things because of
12 the reaction he may receive as a result of that.
13 I think, you know, Steve Skitt had spent a long time
14 in the Prison Service before he -- both with the public
15 and then -- public sector and then with G4S before he
16 came to Gatwick. I think he did -- there was a period
17 of transition for Steve, and I just don't think he was
18 given sufficient support and guidance to make that
19 transition more easy for him.
20 MS TOWNSHEND: Thank you, Ms Newland. I don't have any more
21 questions. Chair, do you have any questions?
22 THE CHAIR: I don't have any questions for you. Thank you
23 very much for coming to give your evidence today.
24 MS TOWNSHEND: I'm told that the transcript didn't quite
25 catch up, so please can I ask request for the

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1 restriction order to be made for D87?
2 THE CHAIR: I understand there's a restriction order in
3 place, but I will make one in respect of that particular
4 individual breach. Thank you very much, Ms Townshend.
5 Thank you, as I say, for coming to give your
6 evidence today.
7 (The witness withdrew)
8 MS TOWNSHEND: We return at 10.00 am tomorrow.
9 THE CHAIR: Thank you. See you at 10.00 am tomorrow.
10 (5.13 pm)
11 (The hearing was adjourned to
12 Tuesday, 22 March 2022 at 10.00 am)
13
14

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