

BROOK HOUSE INQUIRY

First Witness Statement of Naomi Blackwell

I, Naomi Blackwell, will say as follows:

Introduction

1. I am currently employed as the Detention Outreach Manager of the Jesuit Refugee Service UK. This statement draws on my experience and knowledge acquired whilst I was in my previous role as an Advocacy Coordinator with Gatwick Detainee Welfare Group (“GDWG”). JRS UK is aware of and has given me authority to provide this statement to assist the Inquiry concerning abuse and mistreatment of detainees at Brook House Immigration Removal Centre (“IRC”) arising from the BBC Panorama documentary – *Under Cover – Britain’s Immigration Secrets*.
2. I make this statement believing its contents to be true and knowing it will be submitted to the Brook House Inquiry.

My work at GDWG

3. Between July 2013 and November 2018 I was employed as an Advocacy Coordinator with the Gatwick Detainees Welfare Group (GDWG) where I worked on a part-time basis. As the Inquiry will be aware, GDWG is a registered charity that provides emotional and practical support through volunteer visitors to people detained in the IRCs in the area of Gatwick airport, namely Tinsley House and Brook House.
4. My role was to manage GDWG’s volunteers and also provide support and advocacy for detainees. My current role at JRS involves providing support and advocacy to

those detained at the Heathrow IRCs, namely Harmondsworth and Colnbrook and also at Napier Barracks, Folkestone.

5. I have been requested to prepare this statement in relation to my contact with and on behalf of D1275 who I understand is a Core Participant in this Inquiry. This statement has been prepared following my review of file notes that were maintained by GDWG which have been very helpful in relation to precise dates and details. Despite some reliance on the file notes for the minutiae, I vividly recall my dealings with D1275 as his circumstances present a particularly clear example of the failure of the system at Brook House in respect of the safeguarding of vulnerable individuals.
6. Through my intensive contact with detained persons, I often became aware of other individuals within the IRCs whose extreme vulnerability made them unsuitable to be held within the detention environment. This is because detained persons would raise their concerns about others with me. Some of those individuals drawn to my attention by other detained persons lacked or appear to lack mental capacity to make decisions about their welfare, treatment and detention, as a result of their mental health. They were therefore hard to reach as they would not necessarily know to how to seek out help, or recognise that they need help. Because all too often, these individuals only came to my attention through concerns raised by other detained persons, it became my practice whilst I was at Brook House to ask those who I saw whether they were aware of any person who they thought might be in particular need of assistance, a practice I continue in my current role at JRS UK.

My contact with D1275

7. Sometime at the beginning of October 2017 (the exact date is not recorded in the GDWG files), a detained man told me that there was 'a crazy man' on his wing who would walk around wearing half a football on his head and a mask over his eyes. I was told that everyone knew he was 'crazy'.

8. By this time, the BBC Panorama programme on Brook House had aired. I was aware of it and that it showed serious mistreatment of detainees by detention staff. However, at the time, I did not know that the programme footage had captured mistreatment suffered by D1275. I only subsequently became aware of that when I was informed of this by his solicitor, Hamish Arnott, in 2021.
9. After hearing about him from another detained person, I had hoped to make contact with D1275 via the GDWG drop-in sessions, and tried to arrange for his attendance. The term "*drop-in*" is a misnomer as it was not the case that detained people could freely come in to see us. A GDWG list would be prepared and provided via email and then by hand to G4S officers in a room prior to entering the corridor housing the interview rooms. The two G4S officers at the desk would then use the Tannoy system to call the individuals. It was not a robust system as pronunciation of the names could be taxing and if the wings were noisy, people could not hear the call for their turn.
10. We would also request assistance from individual officers to locate detained persons but this would not always produce results and was officer-dependent; some officers appeared genuinely interested in assisting, others showed scant interest and so we were often reliant on luck on the day.
11. D1275 failed to respond to these initial approaches. He failed to attend on so many occasions that his name was removed from the list. I reinstated it with a note explaining he was unwell, in the hope that by persevering we might chance upon him eventually. As a result, it was only on 2 November 2017 when I was finally able to arrange for his cellmate to accompany him to a drop-in the following day, i.e. 3 November 2017.
12. The following are the notes that appear within the records of GDWG relating to that initial visit:

Only arrived at drop-in as he was escorted by his cellmate. Ex-cellmate - he asked him to be removed from his cell because he smelled. Gave every indication that he does not have capacity to make decision about his immigration case. Adamant he wants to return to Iran, but unclear what would await him on arrival and even if he could return. Did not appear floridly psychotic or angry. He was, however, paranoid, distrustful. Talked a lot, tangentially, unable to complete sentences or follow train of thought. Smiles a lot. Almost eager to please. Maybe this is why he has not found himself on E-Wing. He believes that someone called [Name irrelevant] will find him a solicitor, if he needs a solicitor. He doesn't know if he does. He would not give me [Name irrelevant] number or tell me who he was. Stroked the table a lot. Dragging his palms across it. Studied the table at very close range, with his head almost touching it at one point. Unaware he was detained. Unaware he was in England. I asked him how long he had been in England and he seemed surprised he was here. He then asked SJ [a volunteer colleague] where she was. She replied she was in England too and he said, 'ah, so you are in England too'. He spoke of how he needed phone credit and how the credit ran out quickly. His cellmate pointed out that he appears to be using his phone a lot, but it does not contain a SIM and he seems unaware of this. I advised I wanted to arrange a visitor to see him regularly but he said he has numerous people visiting him. His cellmate said that he believes [DX2] has received no visits in BH. he said he arrived in the UK in 2012. He said he was in [DPA] for 2 years and that he had young girlfriends, that he was sorry and he hoped he would be forgiven. The cellmate thinks he has been in BH for 2 months. I asked the cellmate to send me any HO papers he had, but I have received nothing as yet. I requested them again today, 6/11. DOB n/k. Unable to tell me in the Iranian calendar.

13. I obtained D1275's form of authority at this appointment.

14. On the day of my initial meeting with D1275, I submitted a written request for the release of the medical records held by Brook House. This request was followed up

on 6 and 10 November 2017, and they were finally received on 13 November 2017. By then, I had already received a text from another detained man expressing concern about D1275 as he was 'just staring into space'.

15. Due to my significant concerns about D1275's capacity on 6 November 2017, I referred him to Hamish Arnott of Bhatt Murphy Solicitors. I had previously worked with Mr. Arnott on behalf of a man, known as VC, who had exhibited significant mental health problems. Mr. Arnott acted for him in judicial review proceedings, which were ongoing at the time I got in touch with him about D1275. Given my experience working with Mr. Arnott, I was confident that he would be able to provide appropriate representation if so required.
16. In the middle of November 2017, in accordance with the practices of GDWG, I also made arrangements for D1275 to be seen by a volunteer social visitor. This would have involved identifying a suitable volunteer to engage with him and informing him that his allocated visitor intended to visit. Unfortunately, D1275 did not attend the meetings arranged. The GDWG volunteer social visitor waited for 40 minutes on one occasion and he did not appear. Similar to the drop-in process, successful visits with volunteers depend on a number of factors to do with the set up at Brook House. If the individual did not answer their phone, did not hear the Tannoy, did not have the capacity to understand the system or was too depressed to leave his room, we would have to rely entirely on either staff or other fellow detained men to bring them or encourage them to see us. Otherwise, we would not be able to see them.
17. Non-attendance at appointments (social or medical) was always high for people who had specific mental health vulnerabilities and the system and unsympathetic attitude shown by a range of staff within the Brook House establishment towards these men served to exclude them further.

18. On 17 November 2017, the GDWG records show that I emailed Safer Community, a G4S email address where we were to refer any cases with safeguarding concerns. In my email, I note that we had received reports from other detained people raising concerns about D1275. I gave the following examples, 'bizarre behaviour, staring into space, inappropriate laughter, tangential speech'. I requested confirmation of receipt but received no response.
19. It is important to note that prior to the release of the Panorama programme, we were not permitted repeat drop-in visits with the same detained person without prior authority from G4S Management. I understand that this rule and the circumstances they were put in place have already been explained in evidence to the Inquiry from GDWG witnesses. However, once the Panorama programme had aired, we were no longer held to this rule, and were free to request repeat drop-in visits, hence there was no restriction on how many times I could request to visit D1275 in the private rooms.
20. On 19 December 2017, I attended an appointment with D1275 along with his solicitor, Hamish Arnott. D1275's presentation remained the same as when I first met him in November 2017. He appeared to me to be making genuine attempts to communicate but he was incoherent and struggled to formulate answers to Mr. Arnott's questions.
21. Once Bhatt Murphy had been instructed, I continued to try and support and assist D1275 to try and ensure that his welfare was adequately considered. However, it was hard to keep track of his presentation over time because he did not engage with our social visitor. We therefore did not have regular reference within GDWG of his presentation. D1275 did not, for whatever reason, use his telephone and I was reliant on faxing him and asking other detained men to pass messages on to him.
22. I managed to see D1275 again on 22 December 2017, when he was initially uncooperative and asked if I was a police officer. Unfortunately, he was also unable to produce his Home Office reference number.

23. Notwithstanding the fact that I had his written authority, his correct name and date of birth, G4S refused to provide his Home Office reference, when I requested it on 22 December 2017. This prevented me from making a Subject Access Request to the Home Office to obtain his immigration documents. On 27 December 2017, I submitted an application for bail accommodation for his release on his behalf. Unfortunately I have not had sight of this document since, so I cannot confirm the content, but it is highly probable that I would have highlighted his vulnerability.
24. I was aware that Mr. Arnott was taking steps to instruct a psychiatrist which was proving difficult. On 23 February 2018, I attended the initial few minutes of D1275's assessment with Dr Ragunathan, Consultant Psychiatrist in Brook House. My presence was requested to encourage D1275's engagement with the process and once I felt he trusted Dr Ragunathan enough to remain for the duration of the assessment, I left.
25. Following this appointment, I understood from Mr. Arnott that Dr. Ragunathan had raised concerns about D1275's mental health and mental capacity. I was also aware that Mr. Arnott had sent letters to Healthcare, the Home Office and Social Services, raising concerns in relation to D1275's mental capacity and ongoing detention advocating that he should be urgently released to suitable accommodation.
26. On 1 May 2018, I emailed Lawrence Lupin solicitors (who were a firm on the Detention Duty Advice Rota) in relation to D1275's substantive immigration case, asking whether they were willing to represent him. I received confirmation they were and I explained I was due to see D1275 the following day and providing there was no marked sign of improvement in his mental capacity, I was willing to stand as litigation friend in relation to his asylum and immigration matters.
27. On 2 May 2018 I attempted to see D1275 but was informed by officers that he was shaving and 'in a funny mood'.

28. On 23 May 2018, I subsequently emailed Lawrence Lupin solicitors and advised that I had heard from a barrister at a recent training that the Official Solicitor (OS) had stepped in at the Tribunal stage for a case. As the OS was already involved in D1275's case against the Home Office in respect of his detention, I thought that it might be worth considering as an option. The solicitor did not manage to advance the case before D1275's release in June 2018, and I had no further contact with them.
29. My next substantive meeting with D1275 alone occurred on 14 May 2018. My notes confirm that he was still seriously unwell *'He started by speaking in Farsi and kept saying he had to leave, but he finally calmed down and we spoke for a while. He presented in exactly the same way as he has done on all previous occasions; smiling and chuckling inappropriately, playing with his fingers and the table, holding intense eye contact, failing to respond to any question with a direct answer and he still really struggles to formulate any coherent thought/sentence, it looks like he is trying and then he falls back on, 'What should I do? What should I say?' I did not notice any improvement in his awareness of his situation. He is aware he is in England. He expresses no distress at being detained.'*
30. On 20 June 2018, I attended an appointment with D1275 with Mr. Arnott. I understand that by then, the judicial review claim had been brought on D1275's behalf by Mr. Arnott with the OS acting as the litigation friend to challenge his immigration detention and to seek his release. At this meeting, D1275 did not recognise Mr. Arnott and did not appear to understand his role. Throughout the interview, he was spitting into a little cup he had brought with him to the room. He said that he was confused.
31. On 26 June 2018, on one of my scheduled non-working days, I was extremely concerned to be advised that D1275 had been released from detention at 17:55 without any apparent support or arrangements being made to ensure that his obvious

care needs would be properly catered for and that he would not subsequently pose a risk to himself or to other members of the public. No notice was given to Mr. Arnott in advance of D1275's release even though there were ongoing judicial review proceedings and that claim was seeking D1275's safe release.

32. On 26 June 2018, my colleague received the following email from Andrew Middleton EO, Caseworker at the Criminal Casework Immigration Enforcement Team at Lunar House,

'Hi Daniel I did not make any specific arrangements for transport so I assume [D1275] was given a travel warrant from Gatwick to Bolton by train. Regards, Andrew'

33. At that stage, we were only aware of an address in Bolton for which D1275 had been given a travel warrant. It was soon apparent that he had not reached his proposed accommodation address. Given his mental health condition, I contacted Bolton Police, hospitals and the accommodation provider, Serco. As no one knew whether he had been able to utilise the travel warrant provided to him, the local shelter in Crawley were also contacted in case D1275 had presented to him as street homeless.

34. A series of telephone calls were made between ourselves and Bolton police. I raised my concerns detailing D1275's mental health condition and extreme vulnerability. I gave them his address and a description of his physical appearance. They advised me that as his previous address was in DPA, they might not be able to access any history on him as Merseyside Police have a separate system. They said that they could not find any note that the Home Office had notified Bolton police. They agreed they would do a welfare check on that same day at the property and let us know the results.

35. The following day, 27 June 2017, we received a call from Bolton police retracting the offer of a welfare check. The Sergeant's file note was read out to me as follows:

'Home Office put them somewhere that has been risk assessed by the Home Office and confirmed that is suitable. NFA will be carried out and we don't need to attend. If they have released him then he must have some capacity'.

36. They added that if the Home Office or staff at Brook House had concerns they would raise them with their counterparts in the northwest rather than with the police directly. They did advise that if we had concerns that this is a missing person, we should report this as such with local police who would be expected to investigate. I called Sussex police and was advised that they did not consider him missing, but a report would be created for future reference should any officer come into contact with him. As we did not know how far he had managed to travel from Brook House and without support from the police, we also contacted East Surrey Hospital and Crawley Open House, but neither establishment had had recent contact.

37. On 2 July 2018, I again made contact with the accommodation provider and was informed that D1275 had arrived at the property address. I spoke with the property manager who advised me that D1275 had displayed 'odd behaviour'. He had repeatedly asked the manager if he would be returning to the property later and had also made sexual advances to him. The manager said he was extremely reluctant to have any further contact with D1275 and was concerned that women with young children were in the adjacent properties with a shared yard. The manager believed the D1275 should not be accommodated there.

38. I remained particularly concerned for a number of reasons, firstly, I had no doubt that D1275 was being inappropriately housed, he was obviously a vulnerable individual who had no insight into his illness and no ability to act in his own best interests. Secondly, he was displaying inappropriate behaviour which could put members of the public at risk and thirdly, given his actions in detention, I feared he

may offer himself to others for sex and this could in itself could result in him being the subject of abusive or violent actions. As a consequence, I took the unusual decision to contact Bolton police on 3 July 2018 to highlight my concerns specifically in relation to these issues, still pursuing a welfare check. This included discussions with a member of their Sexual Offenders Team. As no crime had been committed there was confusion as to how to log this request and I was informed a decision would be made at a later stage as to whether a welfare check was warranted.

39. On 6 July 2018, I received an email from Mr. Arnott advising that Bolton Social Services were able to visit. On 10 July 2018 I was informed that they had visited and were going to see D1275 again with an interpreter present.

40. I later heard from Mr. Arnott that D1275 had been arrested on 22 July 2018 and then transferred to hospital under section 2 of the Mental Health Act 1983 for urgent assessment. He was then detained under section 3 of the Mental Health Act 1983 for treatment.

41. I continued to have contact with D1275 through the hospital until we ceased contact on 21 August 2018.

My contact with VC

42. As mentioned earlier in the statement, prior to working with Mr. Arnott on D1275's case, I had referred another case to Mr. Arnott, that of a man, VC, whose health deteriorated to such an extent that he also lost mental capacity whilst in immigration detention. I exhibit the statement I prepared on his behalf for the purposes of his judicial review proceedings which commenced in 2015 as **Exhibit NB/1**.

43. VC had contacted GDWG initially on 31 December 2014 requesting assistance and from the outset it was clear he would require a psychiatric assessment and a referral to public law solicitors. VC believed his sole issue to revolve around losing his Spanish residency as a result of having been sectioned under the Mental Health Act

1983. It later transpired that he had be sectioned under the Mental Health Act 1983 on 10 previous occasions in the community. I noted that his speech was tangential, that he veered from laughter to dismay in quick succession and that he was displaying paranoid behaviour.

44. Given his mental state and my serious concerns for his welfare in detention, I referred him to Medical Justice and later to Mr. Arnott at Bhatt Murphy. When Bhatt Murphy issued judicial review proceedings for VC, with the OS acting as his litigation friend, Bhatt Murphy requested I provide a witness statement for the claim proceedings, to explain my contact with VC and my observations of his rapid decline in his mental health whilst in detention.

45. On 5 May 2015 VC was transferred to hospital and sectioned under the Mental Health Act 1983 and thus began receiving treatment for his illness. Mr. Arnott worked for years on this case and it was confirmed in the Court of Appeal in 2018 that VC had been detained unlawfully between 30 April 2014 and 27 April 2015 and that the failure to arrangements to identify and assist those with mental illness and who may lack capacity was a breach of s20 and 29 of the Equality Act 2010. This was in the context of challenging decision to detain or to segregate whilst detained. VC had been segregated on 6 occasions when detained at Brook House IRC. Force had been used to transfer him to E Wing. The Court of Appeal did not agree that his treatment was a breach of Article 3 ECHR. This was appealed to the Supreme Court. I now understand that on 11 January 2021, the Supreme Court allowed VC's appeal against the ruling on Article 3 ECHR and that this was because the Home Office had conceded that VC's treatment at Brook House had breached his rights under Article 3 ECHR.

46. As a result of the case highlighting serious failings in the system particularly around those who lack mental capacity GDWG suffered considerable backlash from the Home Office and G4S, with the focus on the witness statement I had made on behalf of VC and a criticism that I had operated outside my remit.

47. Over the years, I recall this statement being continuously raised as a criticism of the work of GDWG (and me in particular) by Home Office and G4S Managers. I recall my Director, Nic Eadie, and then James Wilson describing to me how this was being treated as problematic, but the reasons were never explained by the Home Office or G4S with any clarity. The fact of my giving a witness statement on behalf of a vulnerable detainee in support of his claim that he was wrongly detained led to a restriction on repeat visits being imposed at our 'drop-in' so that we could not see an individual more than once. It may well have impacted on my contact with D1275 and others who followed.
48. Without a doubt, the constant pressure and criticism of our support for detained men particularly those with severe vulnerability like D1275 and VC had a chilling effect and impacted on our ability to work freely. I recall Nic Eadie asking me to be very cautious how I worded any correspondence with the Home Office, should they take offence at any perceived criticism of their practices. The fear was that our ability to access Brook House would be withdrawn. That would not be in the interest of all the other detained people who need our help.
49. **D1275** and VC were not two isolated cases, and I would briefly like to mention a few others to highlight the pattern of breaches of duties to those with mental illness and therefore a disability under the Equality Act 2010 held in detention.
50. While at GDWG , after I dealt with the VC case, I met a Lithuanian national who was severely mentally unwell. He was unkempt and had long dirty fingernails. He was confused and incoherent. I recall being in the interview room, alone with him at our first appointment. He went quiet and looked at me for a while. He then said, very slowly, eking out each syllable, 'I am an anaconda.....and you.....you are a pigeon'.
51. He was released suddenly while I was attempting to get him legal representation. Then, a few days later, quite by chance, I met him on the Tube, I could not remain

with him as I had a court hearing. He showed me his bail papers (the only possessions on him) containing a release address which did not appear to exist. (I took a photo of his bail documents and checked the address later when I was back at home). I gave him my number but he did not have a phone so I had no means of communicating with him. I never heard from him again. I was concerned about his presentation and his ability to care for himself. He had been released onto the street when a psychiatric assessment was required in the first instance. I do not recall the date this occurred.

52. I assisted, very briefly, in the case of MDA, in November 2016, having been asked by Sue Willman, a solicitor at Deighton Pierce Glynn (“DPG”), if I could meet with MDA at our weekly drop-in. He had been referred to DPG by Detention Action but subsequently transferred from Heathrow IRC to Brook House, where Detention Action do not operate. I attempted to see him at the drop-in but was told that he kept running off and that his behaviour was erratic and challenging. On 16, 17 and 25 November 2016, I tried to see him again. The officers said his behaviour remained challenging, he had urinated on the table and floor and had refused to see me. I was also informed by men detained that he had been observed shouting, swearing and soiling himself in communal areas.

53. Following a visit by an independent psychiatrist arranged by DPG on 17 November 2016, I was made aware that MDA lacked capacity. I agreed to act as litigation friend for the initial stages in order for Ms. Wilman to have instructions to involve the OS. On 2 December, I saw MDA through a barred door in the visits corridor, I greeted him and he responded by swearing at me. He did not make eye contact, his eyes were fixed on the ceiling. His presentation was bizarre and appeared disturbed. I arranged to see him again on 9, 16, 20 December 2016 and 6 and 13 January 2017. He failed to attend any of these appointments. I was aware that he had been assessed on 18 November 2016 as lacking mental capacity. It was apparent that MDA was not in a position to seek advice and support himself due to his mental health condition. I believe he was transferred from Brook House on 3 February 2017 and

admitted to psychiatric hospital under section 2 of the Mental Health Act 1983. I later visited him there where he was being treated for his mental disorder and I recall he was calm, not distressed and was able to communicate. It was in stark contrast to his presentation in detention. I understand that MDA subsequently succeeded in his judicial review application, similarly in respect of discrimination against him for not making provision to facilitate him to access support and advocacy to challenge his detention and conditions of his detention.

54. In about January 2017 I supported another individual, subject to an automatic deportation order, who was returned to Kabul under the Facilitated Return Scheme. He had arrived in the UK as a child when he was 12 years old, had been raped by Sensitive/irrelevant on the journey by land to the UK and had witnessed people being shot on a border crossing. Prior to this, he had suffered significant physical and emotional abuse as a child. He was a victim of torture with severe mental health problems, which had been documented throughout his case for years. He was a bright individual but was very difficult to assist as he was self-medicating on drugs he obtained whilst in Brook House. He presented as someone with extreme mental health problems and he was not coherent. He spoke of how the Home Office were encouraging him to withdraw his claim for asylum. One day, he did sign up for the Facilitated Return Scheme and he withdrew both his Judicial Review claim and his asylum claim. I did not hear from him again. Once detainees are segregated, they are particularly vulnerable to undue influence from a system designed to remove them, at all cost. It was also a recurring theme, that men would tell me people would be coming in repeatedly asking them to sign papers for voluntary return, particularly those held in isolation.

55. I left GDWG in 2018 and am currently employed at the Jesuit Refugee Service UK, which works in Harmondsworth IRC providing pastoral accompaniment of people in detention, including social visitors, welfare visits and assisting with specialist referrals to appropriate agencies within and outside the IRC. In my current post, in October 2020, I was made aware of an individual who was being bullied by other

men on his wing in Harmondsworth IRC and agreed to visit him. When I first met him, he was very distant, was unable to engage and appeared disinterested. He found it difficult to answer my questions, he did not know how long he had been detained, and each time I asked him it varied enormously. Initially, he told me it was 2 months, then possibly 5 to 6 months. He had, in fact, been detained for 16 months at that point, and when finally released he had been detained for a total of 19 months.

56. There was an indication in his demeanour which suggested he may have had a learning difficulty but I was also concerned there were other underlying serious mental health issues, it was difficult as he did not maintain eye contact and rarely spoke. He expressed no interest in securing legal advice. He was, however, very clear that he wanted to return to his country of origin and that he was frustrated at being detained. He told me he had not had any contact with the Egyptian Embassy but we discovered later that he had, and had been actively assisting the ETD process. He demonstrated no grasp of complexities of his case or his rights as an individual, with disabilities.

57. I referred him to Lewis Kett at Duncan Lewis solicitors who secured his release following an interim relief decision from the High Court. The Home Office finally conceded that he had been unlawfully detained for 10 months. He is currently sectioned under the Mental Health Act 1983. It was after he secured legal advice that we became aware he had previously attempted suicide, was deemed an Adult at Risk Level 2 and had a history of self-harm.

58. Failures to safeguard people with severe mental illness are exacerbated by a culture that is insufficiently open to critique, discussion and challenge, both within the Home Office, and within detention centre management. That my previous witness statement with regards to Brook House was treated as problematic by both the Home Office and G4S is illustrative of this wider problem. I was obliged to seriously consider whether speaking on this occasion, and giving examples from Harmondsworth IRC where I currently work, would draw a similar reaction from staff at Harmondsworth and so impede my ability to offer support there.

59. Notwithstanding a commitment from the Home Office to alter working practices to safeguard Adults at Risk in 2016, people with the severity of mental illness such as D1275, VC and others continue to be detained, with ineffective safeguarding of the most vulnerable. Successful unlawful detention claims ensue, but despite these findings, the practice continues to date. Rule 35s are inadequate and the culture of disbelief permeates the whole system.

60. My experience bears out the findings in the Court of Appeal both in VC in 2018 and MDA in 2019 that the Home Office continues to fail to provide the measures and safeguards necessary to meet the particular needs of those with serious mental illness whose capacity may be compromised in detention. The primary deficit identified by the Court (and supported by the Equality and Human Rights Commission) of a lack of provision of independent mental health advocates (or their equivalent) has not been introduced and I consider there remains ongoing breach of these important duties. The consequence of the absence of this provision is that extremely unwell people like D1275 and VC could have remained detained, without the ability to seek assistance in respect of their detention and their treatment in detention. It should not be dependent on small charities and individual advocates to take steps to assist them to access support. The responsibility has to be with the Home Office and its contractors to operate a system that is capable of protecting these vulnerable detainees.

<u>Statement of Truth</u>
I believe that the facts stated in this witness statement are true. I understand that proceedings for contempt of court may be brought against anyone who makes, or causes to be made, a false statement in a document verified by a statement of truth without an honest belief in its truth.
I am content for this witness statement to form part of the evidence before the Brook House Inquiry and to be published on the Inquiry's website.

Name	Naomi Blackwell
Signature	Signature
Date	25 January 2022

Witness Name: Naomi Blackwell
Statement No: 1
Exhibits: 1