

On behalf of: Capita
Witness: S McKeown
No of statement: 1
Exhibit: SM1

9 MARCH 2022

IN THE PUBLIC INQUIRY INTO THE
MISTREATMENT OF INDIVIDUALS
WHO WERE DETAINED AT BROOK HOUSE
IMMIGRATION REMOVAL CENTRE IN 2017

WITNESS STATEMENT OF SIMON MCKEOWN

I, Simon McKeown, of Capita, whose registered office is situated at 65 Gresham Street, London, England, EC2V 7NQ have conduct of this matter on behalf of Capita Business Services Limited (“Capita”) and I am duly authorised to make this statement on behalf of Capita.

Insofar as the content of this statement is within my personal knowledge it is true. Insofar as the content is not within my personal knowledge, it is true to the best of my knowledge, information and belief.

Appended to this statement is a paginated bundle of documents marked “SM1” to which I will refer in this statement. References to page numbers in this witness statement are references to pages in that exhibit unless otherwise stated (CAP13504506).

I make this statement pursuant to the Rule 9 (Inquiry Rules 2006) request for a witness statement: Capita Corporate Statement (in relation to the work of TASCOR during the Relevant Period) dated 1 October 2021 (the “R9 Request”).

Contractual Arrangements and Management:

1. Capita acquired Reliance Secure Task Management (RSTM) on 24 August 2012 and as part of that acquisition, changed the name to TASCOR Services Limited.
2. Tascor Services Limited (previously RSTM), a wholly owned subsidiary of Capita, entered into a contract for the provision of Escorting and Detention services (the “E&D Services”) with the Home Office on 10 November 2010 (the “Contract”, CAP000306).
3. On or around 1 April 2016 the Contract (CAP000306) was assigned by Tascor Services Limited to Tascor E&D Services Limited (Company Number 09980217) (“TASCOR”) as part of an internal reorganisation. TASCOR is a wholly owned subsidiary of Capita.
4. On 1 May 2018 the Contract (CAP000306) ended. Since 1 May 2018, Mitie have provided the E&D Services under their own subsequent contract with the Home Office.
5. I held the role of managing director of TASCOR from 4 August 2016 up to and including 30 April 2018. I have been a statutory director of TASCOR since 27 September 2016. My position as Managing Director included supervision of the management team, managing the overall account and maintaining a strategic relationship with the Home Office on the E&D contract.
6. Between 1 April 2017 and 31 August 2017 (the “Relevant Period”), the day to day operation of the Contract (CAP000306) was overseen by Dave Weston who was the Business Director for TASCOR. Andy Barber (Head of Overseas Operations) and John Hardy (Head of In Country Escorting and Detention) reported to the Business Director and were the senior field force / operational managers in relation to removal and escorting of detainees. Mr Weston, Mr Barber and Mr Hardy are no longer employed by Capita. All other employees who worked exclusively under the Contract transferred to Mitie as part of the business transfer on 1 May 2018.

7. Alongside the Business Director and Heads of Service (referenced in paragraph 6 above), the structure of the management team during the Relevant Period can be examined in the organisation chart which was provided to the inquiry on 20 October 2021 (CAP000367). As an explanation of the structure of the overall Contract:
- 7.1. TASCOR had a field force of 821 Detention Custody Officers (“DCO”) and 71 Senior Detention Custody Officers (“SDCO”) who worked out of 8 vehicle bases within the United Kingdom.
 - 7.2. The management structure of the field force comprised of 48 Duty Operations Managers (“DOM”) who had line management responsibilities for the DCOs.
 - 7.3. There were eight Service Delivery Managers (“SDM”) who had line management responsibility for the DOMs.
 - 7.4. There were four Regional Managers (“RM”) who had line management responsibilities for the SDMs.
 - 7.5. The RMs reported into the two Heads of Service who reported into the Business Director (referenced in paragraph 6 above).
 - 7.6. Further, there were eight training officers based out of the Birmingham Vehicle Base with one training manager responsible for the training of DCOs.
8. The remaining employees were based at TASCOR’s Operational Control Centre (“OCC”) and Head Office at Victory House, Victory Way, Heston TW5 9NS (the “Head Office”). The functional departments for the Contract (CAP000306), which included Data and Management Information (“MI”), Professional Standards, Investigations, Compliance & Health & Safety, Finance, Business Support and other back office functions were centred at the Head Office. As per the organisational chart there was broadly one manager per function with all senior managers reporting to Dave Weston (Business Director), who reported to myself, Simon McKeown (Managing Director).

9. The scope of services and contractual arrangements under the Contract (CAP000306) were directly between TASCOR (the Service Provider) and the Home Office (the Authority) and are detailed in the Contract (CAP000306) which was provided to the inquiry on 19 October 2021.
10. To my knowledge there were no specific contractual arrangements between TASCOR and G4S directly. During the Relevant Period, G4S managed Brook House Immigration Removal Centre (“IRC”) which is part of the Home Office’s immigration estate. Any part of the Contract which refers to IRCs would have included Brook House, as well as, Colnbrook IRC, Harmondsworth IRC, The Verne IRC, Campsfield IRC, Dungavel IRC and Yarlswood IRC, other short term holding facilities (“STHF”) and Holding Rooms within the United Kingdom.
11. There are no current contractual arrangements between the Home Office, G4S and TASCOR in relation to the provision of removal and escorting services for detained persons at Brook House. So far as I am aware those services are currently provided (and have been since 1 May 2018), by Mitie.

Employees, Roles and Staff Structure:

12. Capita has been unable to locate a list of staff for the Relevant Period due to the length of time since the contract transferred to Mitie. We have however supplied the inquiry with a list of all staff who were subject to the TUPE process on 1 May 2018 and who transferred to Mitie at the time (CAP000368).
13. In addition to those roles referenced in paragraphs 6 to 8 above, and for ease of reference, the below roles would have potentially been involved in the removal of a detained person from Brook House:

Field Force Roles:

- 13.1. **Detainee Custody Officer OSE (DCO)** - Collecting and escorting detainees from the UK where the removal was an escorted scheduled removal or charter removal (overseas);

- 13.2. **Senior Detainee Custody Officer OSE (SDCO)** - Senior Escort & Team leader of escort team escorting detainee from the UK where the removal was an escorted scheduled removal or charter removal (overseas);
- 13.3. **Detention Custody Officer ICE (DCO)** - Collecting and escorting detainee to port within the UK - where the removal was a voluntary return (in-country escort);
- 13.4. **Duty Operations Manager or Duty Manager** - Line management responsibilities for SDCOs & DCOs;
- 13.5. **Service Delivery Manager** - Line management responsibilities for the DOMs; and
- 13.6. **Regional Manager** - Line management responsibilities for the Service Delivery Managers.

Roles Based in the OCC;

- 13.7. **Coordinator** - coordinates the scheduled removals from the United Kingdom; and
- 13.8. **Tasker/Planner/Logger** – plans and manages the movement from the Electronic Reference Form (“ERF” (see paragraph 22 below)) and risk assessment, booking flights via the travel provider and managing the administration of the removal up to the day of departure.

Roles Based at Head Office:

- 13.9. **Head of Overseas** - Overall senior manager for overseas operation;
- 13.10. **Head of Compliance;**
- 13.11. **Head of Professional Standards;**

- 13.12. **Complaint coordinator** - Supporting the Head of Professional Standards by managing processes and procedures for the investigation of complaints by detainees and others; and
- 13.13. **Incident Assessor** Supporting the Head of Professional Standards by managing Use of Force investigations.

Interaction Between Parties:

14. TASCOR provided services to the Home Office under the Contract (CAP000306) which included core services as follows:

- 14.1. The escorting of a detainee to and from locations within the United Kingdom as directed by the Home Office, including the provision of appropriate transport;
- 14.2. The escorting of a detainee which the Home Office had directed to be removed from the United Kingdom into the safe custody of the appropriate overseas authorities at the final point of destination. This would include the provision of medical escorts as demanded;
- 14.3. Overseeing the safe custody of persons detained by the Home Office at Holding Rooms and Ports of Entry, ensuring the welfare of a detainee at all times during detention;
- 14.4. Overseeing the safe custody of persons detained within a relaxed, but secure, regime at the Authority's Short Term Holding Facility at Pennine House in Manchester. TASCOR were also be responsible for maintaining the accommodation, such that it was fully habitable at all times;
- 14.5. Overseeing the safe custody of persons detained by the Home Office in Holding Rooms at the Juxtaposed Controls in Calais and Coquelles, Northern France, ensuring the welfare of a detainee at all times during detention, pending transfer

of custody to the Police Aux Frontières (the Immigration Branch of the French Police); and

14.6. TASCOR may also have been required to provide certain additional escorting services as demanded by the Home Office.

15. In relation specifically to the interaction between TASCOR, G4S and the Home Office in the provision of the removal services in relation to detained persons at Brook House IRC, the following two core services (CAP000323) would have been applicable:

15.1. The escorting of a detainee (by TASCOR) to and from Brook House (which was managed by G4S) within the United Kingdom as directed by the Home Office, including the provision of appropriate transport; and

15.2. The escorting of a detainee (by TASCOR) which the Home Office had directed to be removed from the United Kingdom from Brook House (which was managed by G4S) into the safe custody of the appropriate overseas authorities at the final point of destination. This would have included the provision of medical escorts as demanded.

Removals:

16. Please find at pages SM1 to SM3 of the appended bundle, a list of the titles of the Standard Operating Procedures (“SOP”) pursuant to which removal services were provided by TASCOR (CAP13504506 and the listed procedures can be found at CAP000338-347; CAP000349-359; CAP000361-366; CAP000369-387; CAP000731-748). These would have applied to the transfer (within TASCOR’s custody) of any detainee to and from Brook House during the Relevant Period. These SOPs were provided in full to the inquiry on 19, 20 and 22 October 2021.

17. A copy of the Contract (CAP000306) was also provided to the inquiry in full, (including all Notices of Change (CAP000001-85)) on 19 October 2021.

18. The process for TASCOR arranging the removal/escort of detainees during the Relevant Period is detailed in Core SOP 25 Operational Control Centre (CAP000365). This SOP and process diagram (page 21 of the SOP) outlines the requirements for voluntary returns, escorted scheduled removals and charter removals. It should be read in conjunction with Escort SOP 02 Overseas Movements (CAP000370). Both SOPs were provided to the inquiry on 19 October 2021 and 20 October 2021.
19. The number of officers required to attend the removal / escort would vary based on several factors including both the risk assessment of the detainee and the destination that they were travelling to. A minimum of three escorts would have been required for an escorted overseas removal, however there was no upper limit for the number of escorts prescribed to safely transfer a detainee abroad or within the United Kingdom.
20. The provision of a medic for the transfer or removal would have been dictated based on detainee's available medical history at the time of the request from the Home Office.
21. A risk assessment was executed for all movements carried out by TASCOR for the duration of the Contract (CAP000306) and this would have influenced the provision of additional escorts. Factors which influenced the risk assessment would have included:
- 21.1. Any known risks (including special requirements/medical needs & where an open Assessment Care in Detention and Teamwork (ACDT) remained in issue);
 - 21.2. Any current medical issues;
 - 21.3. A previous failed escorted removal due to disruptive or violent behaviour;
 - 21.4. Any marker for height and physical appearance (being larger/stronger) than average AND known to be non-compliant in the past;
 - 21.5. Any previous information on assaulting staff;
 - 21.6. Additional escorts may have also been provided where the destination country was long haul and required extra escorts to ensure adequate rest of the team during transfer; and

- 21.7. Any other pertinent information from the ERF (See below at paragraph 22).
22. The risk assessment process was supported by regular liaison between the OCC and Home Office employees based at the Detention Escorting Population Management Unit (DEPMU).
23. The ERF was supplied by the Home Office to TASCOR OCC and contained the information required to arrange the escorted removal. TASCOR would also risk assess the removal to determine escort provision. An example copy of the ERF is included in the appended bundle at pages SM4 to SM6 (CAP13504506). The ERF would have been processed onto TASCOR's case management system RECOS. TASCOR would subsequently send a request for flights to the travel service provider, Carlson WagonLit Travel, who would confirm when the flights had been booked and provide the associated documentation. This would have subsequently been confirmed to the Home Office.

Removals Utilising Use of Force:

24. Under the Contract (core SOP 05 (Use of Force (HOMES trained DCO), CAP000345), which was provided to the inquiry on 19 October 2021, Use of Force must be, (i) reasonable in the circumstances; (ii) necessary; and (iii) proportionate to the seriousness of the circumstances. In situations when force can be used against a detainee, Use of Force may only be used by HOMES trained and accredited DCOs.
25. Under the core SOP 05 (Use of Force (HOMES Trained DCO)) (CAP000345), the situations where use of force may be used are as follows:
- 25.1. In defence of self, another person or property;
 - 25.2. To prevent crime;
 - 25.3. To prevent escape and keep a detainee in lawful custody;
 - 25.4. To prevent a disturbance;

- 25.5. To prevent a detainee harming himself / herself;
- 25.6. To search a detainee, when necessary; and
- 25.7. To prevent detainees from seeking to prevent their own or another detainee's lawful removal.
26. In 2017 (January to December), there were 3146 scheduled removals undertaken, of which, 395 Use of Force incidents were recorded. This is equivalent to 12.55% of scheduled removals.
27. Further, in 2017 (January to December), there were 1617 charter removals carried out of which 104 Use of Force incidents were recorded. This is equivalent to 6.81% of charter removals.
28. In total therefore, of 4763 scheduled and charter removals in 2017, there were 499 Use of Force incidents. This is the equivalent to 10.47% across both removal types for the whole year.
29. In 2017 there were a total of 499 Use of Force incidents of which 43 resulted in the raising of a complaint. Therefore, the proportion of Use of Force incidents involving TASCOR officers which resulted in formal complaints by detained persons was 8.6% across all removal types in 2017 and 0.9% of all scheduled and charter removals in 2017.
30. Subsequent data for the following years would need to be requested from Mitie due to the transfer of the Contract on 01 May 2018.

Procedure for Raising Concerns:

31. TASCOR adopted a rigorous complaints procedure in compliance with guidance issued by the Home Office via their Detention Services Orders (Home Office Procedural Instructions). In February 2017 and throughout the Relevant Period the Detention Services

Order 03/2015 (Handling of Complaints), was the relevant Home Office guidance and procedure.

32. A copy of TASCOR's Core SOP 16, Managing Detainee's Complaints (CAP000356), was provided to the inquiry on 19 October 2021, which details the complaint process.
33. There was a dedicated Professional Standards and Compliance department within TASCOR who handled the end to end complaints process. This was required under the Contract (CAP000306).
34. Complaints raised by, or on behalf of, detainees in detention were made on the DCF9 form (see pages SM7 to SM8 in the appended bundle for an example copy)(CAP13504506). These forms were available in 16 designated languages in the IRC, STHF, Holding Rooms and during escort by TASCOR.
35. Completed DCF9 forms were placed in locked yellow complaints box (clearly marked "Immigration Enforcement Complaints") at the locations referenced above at paragraph 33. If, in exceptional circumstances, any forms were handed to staff, they were placed in the locked complaints box.
36. The locked yellow complaints box was subsequently forwarded to the Home Office Detention Services Customer Service Unit ("CSU") to be logged and allocated.
37. Any complaints received to TASCOR by post, which related to any aspect of a detainee's care and welfare whilst in detention, also had to be forwarded on to the Detention Services CSU.
38. As per the Managing Detainee's Complaints SOP (CAP000356), there was also a section within the detainee welfare leaflet on how to raise complaints. This leaflet was provided to detainees on transfer or removal and was translated into 16 designated languages. A copy of the detainee welfare leaflet can be found in the appended bundle at page SM9 (CAP13504506).

39. For all TASCOR investigated complaints in 2017, there was a three week response time for resolution from the point of the issue being raised. For the year 2017, 90% of complaints were resolved within this time frame.

Complaint Handling:

40. All detainee complaints were sent to the Home Office for their review where they were assessed for the severity of the complaint. Usually, if the complaint related to service delivery or minor misconduct, it was referred back to TASCOR and internally investigated by TASCOR. If the complaint related to serious misconduct, it would be sent to be investigated by Professional Standards Unit (“PSU”) at the Home Office.

41. For the Relevant Period, the majority of complaints related to resource provision where TASCOR were unable to collect a detainee due to conflicting tasking priorities. Investigations were carried out by a TASCOR manager who had undergone the relevant training and received guidance to carry out investigations. This training is referenced in Core SOP 02 (Incident Reporting (HOMES Trained DCOs), (CAP000340)), which was provided to the inquiry on 19 October 2021.

42. During 2017 the content of replies sent to complainants continued to be quality assured through the Lessons Learnt process within the Home Office. From June 2017 onwards, all cover response letters for all complaints were reviewed by the Home Office for compliance. Prior to June 2017 a randomised cross section of cover response letters were reviewed alongside all complaints that related to Short Term Holding Facilities and Holding Rooms.

43. All PSU investigation recommendations followed the formal Lessons Learnt process whereby recommendations were logged by the Home Office and TASCOR and regularly reviewed prior to evidencing for closure. External recommendations (i.e. from Detention Services and PSU) were promptly reviewed by TASCOR, recorded and disseminated to operational managers for implementation, as appropriate. For example, if a PSU recommendation was that a DCO received further HOMES training, TASCOR would notify the Lesson Learnt department at the Home Office when this had been completed.

44. Where internal investigations provided recommendations, these were dealt with through internal group communications, read and records, provision of refresher training and updates to local operating procedures. If the investigation recommended that disciplinary procedures commenced, then this would be instigated.
45. The inquiry has been provided with all complaints from the Relevant Period from Brook House detainees. In summary, these were:
- 45.1. 7 complaints concerning Use of Force from the Relevant Period from Brook House detainees (inclusive of four of the specific cases requested in the original R9 Request, two of which were outside of the Relevant Period); and
 - 45.2. 11 other complaints (not concerning Use of Force) from the Relevant Period from Brook House detainees (inclusive of one of the specific cases requested in the original R9 Request).
46. Capita is unable to provide footage (bodycam, CCTV or other footage) of any incidents which gave rise to a complaint (or otherwise). All footage was returned to the Home Office when the Contract transferred to Mitie on 1 May 2018.

Use of Force Incidents:

47. The Use of Force Monitor was a Home Office role within the Immigration & Enforcement Directorate which was created following recommendations made by the Independent Advisory Panel on Non Compliance Management (IAPNCM). From June 2014, the Use of Force Monitor recorded and logged all Use of Force reports received from TASCOR.
48. TASCOR's activities included in country escorting (ICE), overseas escorting (OSE), management of short term holding facilities (STHF), reporting centres and holding rooms across the Home Office immigration estate.
49. All officers were authorised, under the Contract (CAP000306), to use force (where necessary, reasonable and proportionate) within the bespoke restraint training course, the

Home Office Manual for Escorting Safely (HOMES). A copy of the HOMES manual can be supplied to the inquiry upon request.

50. During the Relevant Period, the TASCOR Data and Management Information Department provided all Use of Force and passive use of restraints reports to the Use of Force Monitor (at the Home Office). This was completed on a daily basis.
51. Following Ministerial approval, HOMES data was initially published on the 26th November 2015 on <https://www.gov.uk/government/publications/immigration-enforcement-data>. This continued through the contract lifetime.

Scheduled Removals:

52. During the Relevant Period there were 314 scheduled removals by TASCOR from Brook House IRC of which, 56 recorded a Use of Force incident. This is the equivalent to 17.8% of scheduled removals (of 314 scheduled removals) from Brook House recording a Use of Force incident.
53. During the Relevant Period there were five formal complaints to TASCOR made by detainees from Brook House which cited a Use of Force incident. This is the equivalent of 11.2% of all Use of Force incidents from Brook House.
54. In the Relevant Period the five complaints from detained persons at Brook House relating to Use of Force were investigated by the PSU at the Home office. All five of these complaints were found to be unsubstantiated.
55. The inquiry has been provided with all of the available data for the 56 Use of Force incidents from scheduled removals from Brook House IRC over the Relevant Period.

Charter removals:

56. Capita does not have the specific number of charter removals from Brook House during the Relevant Period. This is because charter flight removals were operated differently to scheduled removals. All documentation in relation to charter removals was sent directly to

the Home Office as soon as the transfer was complete. TASCOR did not retain electronic copies of charter flight removal documents.

57. Capita can confirm that there is no record of complaints relating to Use of Force incidents on charter removals from Brook House during the Relevant Period. Copies of all the Use of Force reports from the charter flights can be obtained from the Home Office. It was a requirement under the Contract to report on these within 24 hours of de-muster.
58. During the Relevant Period, there were a total of 617 detainees removed on charter flights from across the Home Office immigration estate (including but not limited to Brook House IRC). There were 37 instances of Use of Force and therefore 5.9% of charter removals had an instance of Use of Force.
59. Capita is unable to provide footage (bodycam, CCTV or other footage) of any incidents which gave rise to a complaint (or otherwise). All footage was returned to the Home Office when the Contract transferred to Mitie on 1 May 2018.

Use of Force Injuries:

60. If during a removal, a Use of Force incident resulted in a detainee injury, it would be the Senior DCO's responsibility on the removal, to complete a request for a medical examination. This would be documented on a TF144 form. A blank copy of a TF144 form can be found at page SM10 of the appended bundle (CAP13504506).
61. If the removal flight had a medic assigned to the detainee, the medic would also complete the medical evidence report (TF143) to ensure an adequate audit trail to provide to the Home Office as part of the Use of Force reporting. A blank copy of a TF143 form can be found at pages SM11 to SM12 of the appended bundle (CAP13504506)..
62. Depending on the severity of the injury, TASCOR may also have been required to escort the detainee to hospital to ensure the detainee was fit to discharge back to the custody of the IRC had the removal been aborted as a result of said injury.

63. All officers are appropriately trained in the Use of Force which was refreshed bi-annually during the HOMES refresher course. Any use of restraint, including equipment, was only used where it was necessary, reasonable and proportionate having regard to the relevant circumstances.
64. Where restraint was used, this was kept under regular review and only used for the length of time considered appropriate. Please refer to Core SOP 10: Managing Detainee's Injuries (CAP000350), CORE SOP 02 Incident Reporting (HOMES Trained DCOs) (CAP000340) and CORE SOP 16 Detainee complaints (CAP000356) (provided to the inquiry on 19 October 2021) for more information relating to the process.
65. If an injury resulted in a complaint being raised by a detainee, the same process as described in paragraphs 31 to 39 above would be followed.
66. Detainees who alleged they had been assaulted, either by another Detainee or by a TASCOR employee, would be given a medical examination which would record any injuries and, subject to the agreement of the Detainee, would be photographed with the photographs being placed on the individual's medical file in accordance with CORE SOP 07 (Emergency and Routine Medical Provision for Detainees) (CAP000347).

D1473:

67. Capita has provided the entirety of the complaint file in relation to the complaint made by D1473 (CAP000532-606). This was provided to the inquiry on 20 October 2021.
68. The complaint was found to be unsubstantiated by the PSU at the Home Office.
69. Capita is unable to provide footage (bodycam, CCTV or other footage) of any incidents which gave rise to a complaint (or otherwise). All footage was returned to the Home Office when the Contract transferred to Mitie on 1 May 2018.

D1234:

70. Capita has provided the entirety of the complaint file in relation to the complaint made by D1234 (CAP000467-531). This was provided to the inquiry on 21 October 2021.

71. The complaint was found to be unsubstantiated by the PSU at the Home Office.

72. This complaint falls outside of the Relevant Period.

73. Capita is unable to provide footage (bodycam, CCTV or other footage) of any incidents which gave rise to a complaint (or otherwise). All footage was returned to the Home Office when the Contract transferred to Mitie on 1 May 2018.

D1738:

74. Capita has provided the entirety of the complaint file in relation to the complaint made by D1738 (CAP000607-682; CAP000763-838). This was provided to the inquiry on 20 October 2021.

75. The complaint was found to be unsubstantiated by the PSU at the Home Office.

76. Capita is unable to provide footage (bodycam, CCTV or other footage) of any incidents which gave rise to a complaint (or otherwise). All footage was returned to the Home Office when the Contract transferred to Mitie on 1 May 2018.

D1798:

77. Capita has provided the entirety of the complaint file in relation to the complaint made by D1798 (CAP000683-730; CAP000870-917). This was provided to the inquiry on 20 October 2021.

78. The complaint was found to be unsubstantiated by the PSU at the Home Office.

79. Capita is unable to provide footage (bodycam, CCTV or other footage) of any incidents which gave rise to a complaint (or otherwise). All footage was returned to the Home Office when the Contract transferred to Mitie on 1 May 2018.

80. We are unaware of any concerns raised by the Independent Monitoring Board following this complaint.

D3282:

81. Capita has provided the entirety of the complaint file in relation to the complaint made by D3282 (CAP000388-466). This was provided to the inquiry on 20 October 2021.

82. The complaint was found to be unsubstantiated by the PSU at the Home Office.

83. This complaint falls outside of the Relevant Period.

84. Capita is unable to provide footage (bodycam, CCTV or other footage) of any incidents which gave rise to a complaint (or otherwise). All footage was returned to the Home Office when the Contract transferred to Mitie on 1 May 2018.

85. We are unaware of any concerns raised by the Independent Monitoring Board following this complaint.

Statement of Truth:

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.

Signed:

Signature

Simon McKeown
Managing Director, Tascor E&D Limited
for and on behalf of Capita Business Services Limited

Dated this 9 March 2022

**On behalf of: Capita
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