

BROOK HOUSE INQUIRY

FIRST WITNESS STATEMENT OF JANE SHANNON

I, Jane Shannon, will say as follows:

INTRODUCTION

1. My date of birth is DPA and I make this statement following the Inquiry's Rule 9 request dated 14 February 2022.

BACKGROUND

2. As I have detailed at paragraph 7 of my Verita statement [VER000246] ("Lampard transcript"), I joined G4S Custody and Detention Services (a division of G4S Care and Justice Services (UK) Limited ('C&DS')) in August 2015 as a Learning and Development Business Partner. Prior to that, I worked in the Civil Service for almost 20 years in operational and L&D roles in both prisons and Courts. I started as a prison custody officer and worked my way up to Governor level. I also worked as a Courts Inspector and looked at administration and staff training. In May 2017, I was the G4S UK and Ireland Lead for Learning and Development. In January 2018, my role changed to Head of Learning and Development for Care and Justice Services, following a restructure of the G4S business.

3. I did several qualifications through the prison service, including accredited qualifications in training and in coaching. I also sat on the Ministry of Justice Skills and Apprenticeship Council and covered all of the training across the Ministry of Justice. As part of my prison training, I worked in a bid team where I looked at the staff training

element of public and private sector bids. I was also involved in prison service staff training and ensuring the quality of that training.

4. I am a Fellow of the Institute for Leadership and Management. This is a level 7 qualification in recognition of the work I have done previously and is a formal qualification in equality, diversity, inclusion and leadership and management.

5. I left G4S in January 2019, to join Corndel who were one of the apprenticeship providers I brought into G4S. I was impressed with them and it was a good personal development opportunity.

ATTENDANCE AND QUALITY ASSURANCE OF TRAINING

6. I cannot think of anything else that I can add to my transcript of my interview on 28 February 2018 with Kate Lampard and Ed Marsden [VER000246] that is relevant to the Terms of Reference of the Brook House Inquiry.

7. At paragraphs 91-100 of the Lampard Transcript [VER000246] I confirm that the individual sites were responsible for monitoring and auditing the training of their staff, and providing evidence of attendance to the central assurance team at G4S, which is where my role sat. The only thing I would add, as I am not sure this is clear from the Lampard Transcript, is that when I joined, all of the contracts for individual sites were managed as individual contracts. Each site had their own training teams and were responsible at site level for training of staff because each contract was different and had different requirements. My role was new and I formed part of Jerry Petherick's centre of excellence team. My role was to bring in an independent view to support and advise those sites on how to deliver the training for their staff at contract level to the best of their ability.

8. At paragraph 8.85 page 117 of CJS005923, being Kate Lampard and Ed Marsden's Report regarding their independent investigation into concerns about Brook House, published in November 2018 ('the Lampard Report'), the Training Manager at Gatwick IRCs says that there was no quality assurance in place regarding the delivery of training sessions. At that point, quality assurance very firmly sat at site level. I

would expect to see the training manager and or the senior management team (SMT) at Brook House sitting in on training sessions to quality assure the training that was taking place. Part of my role was to support Brook House to start to look at bringing in quality assurance of training and this was included in the recommendations I made at the time. For example, tape recording training sessions in order to look at the quality of the sessions taking place and to continuously improve and embed the learning.

9. Where I have said in the Lampard Transcript that training should be monitored independently of site level, I meant that the Home Office should do that as they were monitoring the contract and training forms part of this. I also suggested that my Head of Capability should sit in and observe some sessions and do some quality assurance around those sessions to support the site rather than I would sit in those sessions myself as Head of L&D as at that time I was covering the training strategy for all of UK and Ireland contracts.

10. At paragraphs 91-92 and 138-142 of the Lampard Transcript [VER000246] I have referred to my suggestion that training sessions should be recorded and 10 percent of recordings listened to for quality assurance and that the Head of Capability should monitor and audit training. From memory, I think this was raised in an ExCom meeting. This was a meeting with Jerry Petherick and his central team, which all of the site directors would have attended. Ben Saunders from Brook House would have been there. I cannot remember the date of the meeting. I suggested that we did a review of the Initial Training Course ("ITC") material and that the Head of Capability would monitor and audit the training for all sites not just Brook House.

11. These measures weren't fully implemented. I remember that the suggestion was made to the centre directors and wasn't taken up by Ben Saunders. I do not know why the suggestion wasn't taken up. I would like to add that there was a training needs analysis done on site by myself and the Head of Capability, including focus groups and 1-2-1 interviews with individuals representing all levels of staff for Gatwick IRC's. Some elements of the recommendations made were taken up, but the audit of the training materials recommendation was not taken up. We did start to do a review of the ITC and started to work with the training manager on site including making

recommendations as to how we could improve that, and indeed from memory the training manager did make some amendments to operational training sessions.

TRAINING CONTENT

12. At paragraphs 148-152 of the Lampard Transcript [VER000246] and paragraphs 8.93 and 8.99 of the Lampard Report [CJS005923] I talk about issues with the ITC. In addition to the information I have already given in my Lampard Transcript, my biggest concern about delivering the ITC as a 'chalk and talk' course, and I had raised this as a concern, was that new members of staff had no exposure to the real Brook House environment either to the physical lay out or how to interact with Detainees. They therefore could not embed the knowledge, skills and behaviours they were being taught in a classroom environment into real life scenarios. They were not allowed to even see the centre and wouldn't know the environment. The training was not experiential; they couldn't understand how to apply the tools they had been taught into real life scenarios. There was no role play to give some case study scenarios they could learn from. As I explain below however, I believe that the only real way to understand the environment is to experience it

13. In addition, many of the materials from HMPPS were designed for prisons not IRCs. Prisoners are treated very differently to detainees so the material was wrong in my opinion. I also found that the ITC was shorter than any of the ITCs used at other sites and did not have two weeks of shadowing at the end. It was a six-week pure theory based course. The new officers wouldn't know what the centre actually looked like inside and couldn't see the centre on the CCTV. My understanding was that this was prohibited by the Home Office for anyone (including staff) who had not achieved full clearance after their initial training. Permission would need to be sought by the centre Director from the Home Office to allow supervised visits to site for new staff to shadow those already working at the site.

14. I stand by my comment that candidates could only appreciate the unique environment of Brook House by experiencing it. I do not see how you can prepare anybody to apply the skills they have been taught without giving them the opportunity to understand, observe and experience how they would apply those skills.

15. I did raise this with the centre director, Ben Saunders, and he was going to pick this up with the contract manager for the Home Office because it was a requirement of the contract that no one could enter the centre as a member of staff without full clearance. I did say it was very poor practice to expect new trainees to come in and go live on day one after their clearance had been received with no prior experience and no shadowing.

16. At paragraph 51 of the Lampard Transcript [VER000246] I have given my account of the experiences of candidates on the ITC when shadowing other members of staff. I would like to add that on paper they had five days shadowing. However, I spoke to many new staff who said either the five days didn't take place or the quality of that experience could vary significantly. Some new staff weren't exposed at all because the shadow officer didn't take them into the areas or they were paired with someone who was an experienced DCO who did get them involved and took them round. There was no pre-selection process regarding the DCOs who provided the experience, it was not checked or quality assured at any point, either by the training manager on site or anyone else. If an individual didn't get their clearance they didn't get their five days shadowing. It was a very patchy experience across the ITC cohort as to the type of exposure they got.

17. At paragraph 146 of the Lampard Transcript [VER000246] I have talked about the fact that the training materials are owned by HMPPS and were designed for prisons rather than IRCs. In my view, this is very confusing and misleading. External worries and pressures for detainees can be very different too, meaning mental health and mood can be affected and needs to be cared for and supported. Although you should treat everybody with care and respect, the way you manage detainees and prisoners is very different. The roles and resources available to you in a prison are very different than in an IRC. For example, you don't have adjudications and sanctions for poor behaviour in an IRC as you have in prisons. I agree that the ITC should better reflect the requirements of an IRC as opposed to a prison, and include specific IRC-based case studies.

18. I have been referred to 8.100 of the Lampard Report [CJS005923] and asked to comment on the finding of a lack of clarity in the SMT and G4S centrally about where responsibility for solving these issues lay. From my experience, I don't think it was a lack of clarity, it was clear that the contract was managed at a local level. The centre of excellence, which included my role, the audit team, health and safety team and HR team, were there to support the centre to deliver the contract. Accountability and responsibility would sit with the centre director because they had a training manager, HR business partner and auditor. For me, it was more of a lack of monitoring against the contract, not a lack of clarity, and a delay in seeking support or acting on advice to negotiate the contract with the Home Office differently.

19. Each site had a trading review monthly and part of that review was an opportunity for the site director to ask for support in any areas they felt they were struggling to progress, and was an opportunity for the central team to ask for progress updates. As I have said in my Lampard Transcript, the trading review pack had 100 slides, and I managed to include 2 slides in that pack for my area, so I did raise the lack of importance given to training and development across all sites, not just Brook House. It was up to the site director as to what they put in their packs and what they chose to focus on as a risk discussion at those meetings.

20. Recommendation 12 on page 122 of the Lampard Report [CJS005923] says that the SMT should consider giving trainees the opportunity to view body camera images of incidents recorded at Brook House. My experience both in a professional capacity in the prison service and in training, is that if you show live footage of incidents this does help to set the scene and helps the new officers to understand the environment and how to apply training techniques and new skills such as de-escalation. It gives real life scenarios where you can talk through role play and look at continuous improvement around how to handle or how to de-escalate situations. There is some clear evidence and research that has been done showing where this has really added value, where you can talk to students about what they are seeing and they can get a clear understanding as to how situations could have been avoided or dealt with differently to improve the ultimate outcome.

TRAINING DELIVERY

21. Paragraphs 107-110 of the Lampard Transcript [VER000246] and paragraph 8.106 p123 of the Lampard Report [CJS005923] refer to staff working at Brook House who had not had refresher training at the correct time - and so should not have been rostered for operation duties. I cannot comment on how frequently this happened and whether staff were in practice rostered for operational duties as this was managed at site level. The only information that would be collected centrally is when staff did their training. I would not have had any oversight of when staff were rostered for duty.

22. Similarly, I cannot comment on the suggestion that, between September and December 2017, staff pressures and the lack of Control and Restraint (C&R) trainers, meant that Brook House had to obtain the agreement of the Home Office manager at Gatwick IRCs for 20 staff whose C&R training had lapsed to operate as Detainee Custody Officers (DCOs) for about a month. This would be managed locally. This is something that could have been raised at a trading review but I do not recall anything.

23. There would have been targets for refresher training at Brook House. The only thing that would have been recorded on trading review was the statutory and mandatory training for example, C&R training and whether it was in or out of date. Nothing else would have come to the trading review pack and, therefore, I would have had no sight over whether Brook House was on target for their local training plan. The training was managed locally. As I have said at paragraph 124 of my Lampard Transcript, broadly speaking, they are very good at making sure that they continue with their statutory, mandatory and refresher training which is planned months in advance and included in an annual training plan, any deficit in trained staff would have been identified quickly at site level.

24. I am not able to comment on paragraph 8.105 p123 of the Lampard Report [CJS005923] and specifically the suggestion that, between January and (at least) November 2017, just two DCMs had received their annual refresher training in ACDT (the care of detainees at risk of harm) case management. This would have been managed locally so I would have no visibility of this. This information is not something that

would have been reported on at trading reviews unless the site Director chose to raise this as a risk.

25. Paragraph 8.103 of the Lampard Report [CJS005923] suggests that, in January 2018, 28 percent of staff were overdue with their refresher training, largely because staff could not be released from operational duties. This was all managed locally; day-to-day deployment of staff across the detention centre is an operational decision. They should be prioritising the release of those members of staff who need to do training. The training manager on site is the person who would discuss this with operational manager in charge of the centre for the day. Normally sites have a morning operational meeting to redeploy staff for that day to meet the pressing needs.

26. I have considered paragraph 8.104 of the Lampard Report [CJS005923]. I am not able to comment on the suggestion that two DCOs had not had refresher training other than C&R training in two years. That training would have been dealt with locally.

27. I would not have been aware at centre of excellence level of whether staff had been working in Brook House without the C&R refresher training that is a strict condition of Home Office DCO accreditation. This would have been managed locally, any deviation from this part of the contract would have to be negotiated with the Home Office at site level.

28. Paragraph 8.113 of the Lampard Report [CJS005923] suggests that staff did not receive safeguarding refresher training. The centre would have reported safeguarding training to the trading review and the ExCom team but I would not have known which individuals had not had their training unless it was raised as a concern. The head of support services referenced in the Lampard Report relates to the line manager of the Training Manager at Brook house so this person would have had the information and the authority to rectify this locally.

29. Paragraph 8.114 of the Lampard Report details the training needs analysis that was undertaken by myself and the head of capability post Panorama. We identified training needs on individual staff records were not being fed into the centre training plan. The comment about some staff being out of date for their safeguarding refresher

training is probable that this was the case, as it was never fed into the centre plan, so I suspect it was not showing at centre plan level let alone at my level at that time. Our recommendation was for a learning committee to be put in place at site level to discuss training needs raised at site level to ensure these were reflected and managed through the annual site training plan on a quarterly basis.

30. In paragraphs 18 to 26 of the Lampard Transcript [VER000246] I have talked about my views about the training received by training managers, their personal development, opportunities for sharing best practice, and their workload. All I have to add to my transcript is that they all have to have training qualifications and they are verified at site level. I did see training qualifications and I introduced training manager meetings off site so they could meet as a group, support each other and raise any concerns they had about how to manage and deliver training plans for their areas and any further training needs they had as individuals.

31. I introduced and chaired the six-weekly meetings attended by Training Managers as soon as I started in role. When my head of capability started around May 2017, he also attended the meetings and he took over chairing them in around July 2017. I would then continue to attend on an ad hoc basis and by the end of that year I attended occasionally.

32. I felt that the content and frequency of those meetings was sufficient and we did check this regularly with the training managers themselves. The aim was to get an overview of how to get the training managers to work together to share good practice and look at ways to continually improve their own sites. The responsibility for the training plans still sat with them but they did have the opportunity to share best practice and training materials so that this could be adapted to their site needs.

33. I think it is appropriate that the personal development and support of Training Managers was the responsibility of the management of individual sites, rather than G4S centrally because all of the contracts were very different around what the training requirements were both for staff and the managers. My role and the role of my Head of Capability was to support them centrally with suggested improvements, opportunity to share best practice and to support them at site level if requested to do so.

34. The Training Manager's role was to coordinate the ITC and make sure they have the right facilitators for each session and to look after the quality assurance. They did not do all of the delivery of an ITC as they should be using subject matter experts to deal with different topics, subject matter experts would where necessary be accredited in the training they were delivering (such as Health & Safety or Self Harm prevention trainers). If the Training Manager was suitably qualified to deliver a particular session that would be appropriate and this would vary across the sites depending on the Training Manager's qualifications and the training needs for that specific site. Each site would use the resource they have on site to deliver the training. The Training Manager would publish the timetable for each cohort for the ITC, the facilitators would see the timetable and their time is booked through the central detail office so they are available to deliver those sessions and this is done weeks in advance as part of the overall site training plan.

35. The Training Manager at Brook House did not raise any concerns with me to suggest that he had no staff to support him for seven months from April 2017, was just firefighting demands, and found it difficult to cope with his workload. As I explained in my Lampard Transcript at paragraph 26, this complaint doesn't accord with the Training Manager attending the training manager meetings and didn't raise any issues. His manager was on site and he would have been the Training Manager's first port of call to raise any concerns around resource and workload on a daily basis at the morning meeting to discuss how they deployed staff that day to manage the needs of the site.

36. I would have no knowledge of whether those delivering the ITC and refresher courses were appropriately qualified. If that is the case, they shouldn't have been delivering sessions they are not qualified for. That is dealt with at local site level. Every site has staff who are appropriately trained to deliver certain aspects of the ITC. Part of the audit process in place is to make sure each site had the right number of qualified staff. Part of the delivery of the contract for the Home Office would have been how many of the ITC programmes ran, how many ran on time and how many students qualified and became DCOs. If there had been any issue in delivering that it would absolutely have been picked up as part of the performance quarterly review.

37. I have considered paragraphs 8.81-8.84 of the Lampard Report [CJS005923]. I am not able to comment on the observations made by Kate Lampard and Ed Marsden that during their own training that the trainers appeared dismissive of the rules on the use of physical force as I was not part of when they had their training and the observation and the quality observation of the training was not undertaken by me.

38. Similarly, I am not able to comment on the suggested behaviour of trainers at another session, including encouraging the use of swearing, aggression and violence as I was not present.

39. Paragraphs 8.108-8.116, 10.43 and 10.60-10.65 of the Lampard Report [CJS005923] relate to the suggestion that staff felt they needed to be better trained in some subjects, including:

- a) specialised mental health training for those working with detainees with more challenging mental health issues;
- b) managing drugs and other substance misuse;
- c) immigration processes for welfare staff; and
- d) age dispute cases.

The only comment I can make regarding this is that this is all down to local site delivery as part of the ITC programme. We did do a review of the ITC with the site and made recommendations based on that. That review was more about the actual programme and the delivery than the technical content of the training, however some gaps in content were identified at the time and raised at site level by the Head of Capability. The training manager on site did a review to look at the content of the ITC and recommendations from that would have been dealt with at site level. This would have formed part of the recovery plan and would have been but done at site level and agreed with the senior management team at Brook House as to what the content of the ITC needed to be.

40. I am not able to comment on the finding that it was wholly inappropriate for managers without specialist mental health training or training qualifications to give

DCOs mental health training as this would have been managed at site level. I would expect somebody that is appropriately trained to facilitate a mental health session.

PERSONAL DEVELOPMENT

41. At paragraph 177 of the Lampard Transcript [VER000246] and paragraphs 8.117-8.118 & 8.120 of the Lampard Report [CJS005923] there is a suggestion that front-line managers did not have time in their roles for personal development, and that they were not being sufficiently developed. I did do a training needs analysis and identified that managers had not received any formal leadership or management training. My recommendation, which is something we brought in as part of the recovery plan, was to bring in a level 3 and level 5 accredited apprenticeship in leadership and management. Level 3 was aimed at front line managers, so the first level of management that a DCO would experience through promotion and level 5 was brought in for middle to senior managers. Senior leadership away days facilitated by myself and another experienced trainer helped them become more of an effective management team and subsequently support their own staff teams and deliver the business objectives of the site.

42. I am not able to comment on the finding that there was a lack of capable frontline management at Brook House, resulting in a failure to implement the agreed appraisal process, as capability of staff was managed at local level. In addition, capability might not refer to training and development.

43. In relation to the finding that, as the appraisal and development process for staff at Brook House was not effective, staff were left feeling undervalued and unsupported, resulting perhaps in poor performance and inappropriate behaviours and attitudes going unchecked. The only comment I can make is that I know that any training and development comments on the EDRs (appraisals) were not being fed into the local training plan and that is the issue I highlighted in my review. I cannot comment on whether that resulted in staff feeling unsupported. The only part I was aware of when I did one to one discussions with various members of staff is that they said they lacked leadership and management training and development and through that felt unsupported

in a leadership role, this was addressed through leadership and management apprenticeships being offered across all G4S contracts by myself and my team.

44. At paragraphs 180-181 of the Lampard Transcript [VER000246] there is a suggestion that DCOs were not necessarily being promoted to DCMs for their management skills. I think this relates to the Conscious Leaders programme, which is something that was brought in before I started at G4S. This programme was a centrally led initiative rolled out across all contracts including Custody and Detention service. I believe the expectation from senior management at G4S was that all senior managers through to middle managers were to take part in that Conscious Leaders programme. When I joined G4S, the programme was coming to an end. I went on one of the last cohorts of the programme, which was a 3-day programme, to experience what it was like and so that I could understand what had already been taught.

45. At paragraphs 7.56, 7.66-7.70 and 7.76 of the Lampard Report [CJS005923] there is a suggestion that frontline management at Brook House was at its weakest in relation to management by DCMs and that DCMs received no formal training other than shadowing. I was made aware that at local level that they were promoted to the DCM role because of the high turnover of staff and that this meant that they felt that those in those roles had a lack of sufficient skill. Some not of them had not had any leadership or management training. When the leadership and management apprenticeships were introduced this would have addressed this.

46. As far as the comments in those parts of the report that is the view of the interim director not my view and I wasn't part of that conversation. I know there was a high turnover of staff therefore one of the bits I picked up on was that there was a training need around leadership and management skill at that level.

47. In relation to the suggestion at paragraphs 8.111 of the Lampard Report [CJS005923] that staff had not been offered training identified as a need in their employee development reviews (EDRs), or that they had requested, I can confirm that I did do a sample check of EDRs. The interim director asked me to do this and this fed into the recovery plan around the launch of the level 3 and level 5 apprenticeships. The EDRs wouldn't normally be shared with me, it would be dealt with at local level. I

found that development requests or comments noted in the EDR were not on the central training plan. The training plan is an annual training plan submitted by the training manager submitted to senior leadership team (SLT) at site level who then sign off the training required for that year. If the development need is not on the training plan there wouldn't be any training offered for that issue. Any comments around training and development should be transferred across to the central training plan so any common needs could be picked up and that hadn't happened.

REVIEWS AND REFORMS

48. Paragraphs 154-165 of the Lampard Transcript [VER000246] looks at the proposed changes to the ITC. I believe that in January 2016, a review of the operational content of the ITC was started; I was only partly involved in that exercise; this would have been started by the Training manager. I can see from document CJS000510 that ExCom began to discuss reviewing the ITC at a meeting on 28 April 2016.

49. When this was first talked about at ExCom we knew we had difficulties retaining staff and wanted to review training to check staff were equipped to do the role. We wanted to ensure they were getting enough exposure to the role and to check if there were any gaps in technical skills and softer skills, for example how to interact with detainees, read body language and de-escalate and provide care and support for them.

50. I believe the proposed changes were raised a couple of times with the former director of Brook House as we had not heard anything about staff being given the opportunity to shadow inside Brook House and we felt that was a vital part of the ITC training. As far as I am aware, Ben Saunders raised this with the contract manager for the Home Office. I am not aware the changes were implemented.

51. The last part of section 4, Centre Director in document CJS000583, which are the minutes from a SMT meeting, refers to "SMT development for D2s and upwards is being looked at by Jane Shannon and Bryony Farey". The ITC issue must have been considered in that meeting on 25 October 2016, as the development referred to in that document was part of the same review. We reviewed the ITC and leadership and management training development as well, and I highlighted the need for HR mini

modules to be delivered to all line managers and facilitated this through the HRBP at HMP Oakhill.

52. I know that the training manager did a full review of the technical modules in the ITC as this was reported back to me. The plan was signed off by Dan Houghton who is the line manager of the training manager at Brook House, but I don't know when that took place as I wasn't part of those meetings. This would have been written into the SMT meeting on site but I don't have those notes. I don't know if Ben ever pursued getting the shadowing extended to 2 weeks with the Home Office contract manager, which would have extended the ITC from 6 to 8 weeks to give new staff opportunity of seeing inside the establishment.

53. The review identified the need to look at the ITC. How the ITC is going to be done is written into the contract at site level, so we could review and make recommendations but it would need to be signed off by the Home Office via the site director. I conducted a review of the ITC and found that it contained a lot of prison service material, which did not reflect the fact that dealing with detainees was very different. I also realised very quickly that the trainees were not afforded the shadowing period that the mainstream ITC i.e. in a prison setting would receive. I tasked the head of learning and training manager at site to look at the technical content of the ITC.

54. In my transcript at paragraphs 51-58 I say that we had agreement to change the ITC but I can't recall if that actually took place, I think this was agreed with the C&DS ExCom and the Site Director would then need to negotiate the contract change with the Home Office. At paragraph 56, I say that we agreed the basic ITC should be 8 weeks long. It is then down to the centre director to get that signed off by the Home Office and I do not know if that happened.

55. The May 2016 review referred to at paragraphs 64-69 of the Lampard Transcript [VER000246] was the review of the ITC. Following this review, we indicated that we wanted to move the ITC to an 8-week programme. I offered to meet with Ben with the Home Office to get the timings changed for the ITC and the exposure of new candidates to the centre during their training. He decided that he would meet with them himself, which was a normal part of the contractual requirement of the site. Ben would have

met with the Home Office fortnightly so he was happy to start the conversation, present them with the review findings and take it from there.

56. I asked my Head of Capability, to undertake a training needs analysis in October 2017 as things hadn't really moved on from the previous review. Part of that review was to check the content of the material in the ITC to make sure it was fit for purpose and fit for the audience it was aimed at and to check whether training needed to be done differently, whether by using third parties or training centres. This was part of a wider review and included prison sites and secure training centres. We had a new Learning and Development business partner appointed from HMPPS for the C&DS contracts (to include detention centres) and so I felt this review was timely and would add value.

57. I had worked with my head of capability previously at the Ministry of Justice and he specialises in initial training for staff across the civil service. He was tasked with making it a more blended approach. He was writing scenarios, role play, focus discussions around topics to enhance the learning ability of the students. He produced about 20 different case studies including detainee case studies of different scenarios that could then be used as a role play situation with students to embed the learning.

58. CJS000024 is the training needs analysis I carried out. This was part of the recovery plan to make improvements and could have been in response to Panorama. This was conducted by myself, my head of capability and a L&D consultant on site on 9 and 10 October 2017.

59. This was accepted as part of the recovery plan. There was a system put in place for any training needs to be taken from EDRs and put into the overall site training plan and this was owned by the head of support services, (who was the line manager of training manager on site) and the training manager. We also implemented the leadership apprenticeships for level 3 for first line managers and level 5 middle managers. We identified 18 learners across levels 3 and 5. We had a 56% completion rate, 90% of those achieved a distinction and 10% achieved a merit, both of which are very good pass levels. Those who did not complete the apprenticeship moved roles or did not continue as managers at Gatwick IRC's. HR mini modules were delivered on site by the HRBP from Rye Hill, for example holding difficult conversations, performance

management, developing your team. One of the recommendations was to set up a training forum on site to review use of force footage, the amount of grievances submitted on a monthly basis and amount of simple investigations. All four of those things gave an indication of whether force was being used appropriately or whether there was an issue around conflict management, conflict resolution and de-escalation. This would have sat with the head of support services on site and I don't know whether that training forum was ever put in place. All of the other parts of the plan I know were implemented.

60. I don't know what the outcome of the work by the Head of Capability on the issue of HM Prison Service training materials being used at Brook House was as I had moved on by then. I know he did a review of the material and was talking to HMPPS and the Home Office about how they could change the material but that would have taken place after I left.

61. I did recommend that a learning forum for senior leadership was put in place, this was to sit at site for them to discuss all of the learning and training needs raised by staff yearly. This should also pick up on information coming out of the review of use of force, grievance and complaints and discuss what training needs were required. I don't know if this was ever set up.

62. I recommended a planning day with Home Office representatives. I thought it was important that we did a planning day so all issues could be discussed. I raised this with Jerry Petherick and Lee Hanford but I don't know if this was implemented.

63. The reference to micro learning resource introduced for DCMs at paragraphs 183-187 of the Lampard Transcript [VER000246] and paragraph 7.73 of the Lampard Report [CJS005923] relates to the level 3 and 5 apprenticeships, which were run by Corndel. The way Corndel do their materials is called micro learning. This is small amounts of learnings in the preferred medium of choice to match the learning style of the learner so could be text books, podcasts, videos etc. For each section you get an introduction through the learning to leadership and management theory and how to put this into practice, one on one support from a professional development coach and then you have to embed the learning in the workplace and report back on your findings, what

you have learnt and how you would improve that next time. So it's about applying the learning and then going back to your coach and discussing what you have done, what the successes were, what improvements could be made. The impact was that 90% those who passed had a distinction and 10% had a merit and a merit is still a really good pass.

64. CJS000510 is a Gatwick SMT meeting and on page 3 there is an entry against my name referencing training and development from the EDRs to pull through into the central plan. A possible post ITC mentoring programme was discussed, where staff who have finished their ITC should then be buddied up with experienced staff and be mentored. This had been brought in at HMP Oakwood and we discussed how we could implement similar programmes at both Gatwick IRCs. I arranged for the training manger from Oakwood to offer advice to the Training manager at Brook House to devise a programme that would work for them. It was discussed with the directors at the meeting and the SMT but I do not know whether this was implemented or not, it was left to the head of residential services to implement.

65. Document CJS000501 relates to the review of the ITC, which I have talked about earlier in this statement. I have referred to the review of the ITC and the findings were put back to Lee Hanford as the interim director along with the training needs analysis for him to consider and action.

66. Document CJS000583 refers to the apprenticeships programme I have referred to earlier in this statement. I looked at the SMT development with Bryony Farey who was the senior HRBP on site. We looked at the apprenticeships, HR mini modules and doing an away day which was 2 days with the SLT team to get them to work together as a SLT team. I was commissioned by Ben Saunders to facilitate that away day with an L&D consultant Morag Aitkin which did take place.

MANAGEMENT

67. In relation to my suggestion that the senior leadership team was lacking in leadership development and engagement with teams and behaviours, I carried out a scoping exercise on site across all staff including SMT. From the SMT interviews, it was really clear that they had never had any management or leadership development

and found it difficult to manage their teams. Paragraphs 172 and 173 of my transcript gives more detail around this.

68. I have considered paragraphs 208-213 of the Lampard Transcript [VER000246] and have been asked if I can expand on comments about the impact of the management structure of G4S on addressing complaints from staff, and the knowledge of managers about what they could do in response to complaints. I am not quite sure what else I can say about this. There was a speak out policy across G4S which was how people raised complaints. I can't comment on whether that system worked at Brook House as I didn't work there.

69. I have considered paragraphs 199-200 of the Lampard Transcript [VER000246]. I don't have any further comment to add to this.

70. In relation to training plans for Brook House, they were signed off by the site's director and controller, rather than by G4S centrally and similarly the refresher training was dealt with at site level. This is because each contract is different and has different training needs, so it is appropriate for it to be managed at site level.

71. In paragraph 37 of the Lampard Transcript [VER000246] I have explained that each G4S establishment had a different contract with training providers. This is because each of the contracts are different. They are even different down to who is heading the contract for example, the Home Office, prison service or young offenders, therefore the training needs to be different for each contract.

72. I have considered paragraphs 193-195 of the Lampard transcript [VER000246]. I am not able to comment on whether and how the focus of G4S on money and the bottom line impacted on the operation of Brook House during the relevant period impacted on the engagement, development and retention of staff as I didn't work at Brook House.

STATEMENT OF TRUTH

I believe that the facts stated herein 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:

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Signature
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Dated:

...14th March 2022.....