

BROOK HOUSE INQUIRY

First Witness Statement of Alan William Gibson

I provide this statement in response to a request under Rule 9 of the Inquiry Rules 2006 dated 14 July 2021.

I, Alan William Gibson, date of birth [DPA] Head of Operations, Detention and Escorting Services, Immigration Enforcement, Home Office, 3rd Floor Apollo House, Wellesley Road, Croydon CR9 3RR. will say as follows:

Introduction

1. In so far as the contents of this statement are within my own personal knowledge, they are true, otherwise they are true to the best of my knowledge, information and belief.
2. The answers provided below are to the best of my knowledge and recollection, with reference to the documents noted in the Rule 9 request and to a limited set of documents drawn to my attention by those advising me in the period provided for drafting this statement. Should the Inquiry wish me to consult any other documents, I would of course be able to do so if given sufficient time.

Background

3. I joined the Home Office as an Executive Officer in December 1986 [Sensitive/Irrelevant]
[Sensitive/Irrelevant] I have worked in the Home Office continuously since then.

4. In more than 34 years in the Home Office I have held a variety of roles at different grades. As an Executive Officer I held roles involved in immigration casework and asylum, before moving on to work in a policing division. As a Higher Executive Officer, I held roles involved in passport security, oversight of the Prison Service, a review of the Probation Service and Home Office strategy. I joined what is now Her Majesty's Passport Office around 2000 as a Senior Executive Officer and Head of Security. I remained working in the Passport Office until September 2015 having gained promotion through Grade 7 to Grade 6, the grade I retain now. Throughout that time I was responsible for matters relating to security and public protection. In addition to the delivery of passport services I was heavily involved in establishing what was the Criminal Records Bureau and in the work undertaken by the government to introduce a national identity card. In September 2015 I transferred to Immigration Enforcement to take up my current role.

Attendance at Brook House and my role at Brook House

5. There are two different Home Office teams based at Brook House: the Detention and Escorting Services Compliance team (Compliance team) and the Immigration Enforcement Detention Engagement team (DET). The Compliance team are responsible for all on-site commercial and contract monitoring work and for assurance that services within the IRC are being delivered effectively and appropriately and that residents' needs are being met. The DETs interact face to face with detainees on behalf of Home Office caseworking teams. They focus on communicating and engaging with people detained at IRCs, helping them to understand their cases and detention and communicating progress and decisions to people on their cases.
6. The Compliance team at Brook House currently comprises a manager at HO Grade 7 and a Senior Executive Officer, who are also responsible for the Compliance team at Tinsley House. The rest of the Brook House team comprises a Higher Executive Officer and 4 Executive Officers. The DET team is overseen by a HO Grade 7 manager who also has responsibility for the DET team at Tinsley House and Heathrow IRCs and Senior Executive Officer who is also responsible for the DET

at Tinsley House. The DET team at Brook House comprises 8 Executive Officers and 6 Administrative Officers.

7. Prior to 2017 there was only one Home Office team operating at Brook House comprising HO Grade 7 and a Senior Executive Officer, who were also responsible for the Home Office team at Tinsley House. The rest of the Brook House team comprised a Higher Executive Officer, 2 Executive Officers and 9 Administrative Officers. This team were responsible for on-site contract management as well as being the primary conduit for interaction between people in detention within the IRC and Home Office caseworking teams.
8. In response to Stephen Shaw's 2016 report on Welfare in Detention¹ and following an initial pilot study, in February 2017 the Home Office took the decision to split the function of the Home Office on-site teams in IRCs, including Brook House. This split was designed to enable a clearer distinction and focus to the separate strands of managing and assuring contract and service delivery and effective engagement and communication with those in detention. Work to further scope and define the roles and sizes of the respective teams continued throughout 2017 with the Gatwick IRCs, including Brook House being first to go live at the end of 2017.
9. I attended Brook House approximately once or twice a month. No special arrangements were made for my attendance. I worked out of the Home Office offices but also spent time with the Centre Director and his deputy if available. It was my normal practice to include in such visits a walk around the IRC either with the senior on-site Home Office manager or the Centre Director/his deputy to see first-hand how the centre was operating.
10. I do not have a copy of the job description for the role I held in relation to Brook House during the relevant period, but my role included oversight of the operation of the immigration detention estate comprising 9 immigration removal centres, 2 residential short term holding facilities and a number of holding rooms; service

¹ <https://www.gov.uk/government/publications/review-into-the-welfare-in-detention-of-vulnerable-persons>

provision by commercial and public sector suppliers at these locations; and, the oversight of the delivery of contracted escorting services.

The Contract

11. G4S were contracted to operate the IRC at Brook House on behalf of the Home Office in 2009 until 2018. I was not in post when G4S were first awarded this contract but it is my understanding that the contract, in line with government guidance at the time of award, was an output based contract. In the broadest terms, I understand this to mean that the Home Office set out what was required and invited proposals for how the requirements could be delivered and at what cost. Following evaluation against pre-defined criteria the details of the bid assessed as having been successful, that of G4S in this case, would form key elements of the contract under which the service would be delivered. The contract awarded to G4S was subsequently extended until May 2020.

12. In 2017, assessment of performance against the contract was primarily based on delivery against the 25 key performance indicators set out in the contract and whether or not G4S has failed in its delivery obligations. Performance measurement relied very heavily on self-reporting and declaration of any service failures by G4S. I understand that self-reporting against KPIs is fairly standard in contracts of this nature. At this time capacity within the Home Office on-site team at Brook House to monitor the contract was very limited. The team was small, had to cover a 12 hour working day and was predominantly focussed on servicing the immediate and often pressing requirements of the immigration system. By that I mean inducting newly arriving detainees, gathering information from detainees on behalf of immigration caseworking teams, and serving decision, removal and release paperwork. The split of the Home Office on-site team into two parts focusing separately on engagement with detained persons on one hand and contract monitoring and assurance on the other (referred to in paragraph 8 above), was accompanied by an increase in resource for both teams. The additional resource and more focussed role gave the onsite Compliance team greater capacity to monitor delivery of the contract.

13. All aspects of the contract are important from a Home Office perspective but the contract contained a mechanism which acknowledged that not all performance elements were equally important. Failure to deliver against elements of the contract attracted performance points which translated into an amount of the service fee that the Home Office would withhold from G4S. In simple terms the more service points accrued through contract failures the more money the Home Office would withhold from payment to G4S at the end of each period. Certain performance failings attracted more service points than others. A small number of service failings were considered to be especially significant and carried a flat service credit penalty – for example an escape from the IRC would have resulted in a service credit, or sum withheld from payment of £30,000. This was all dealt with by the on-site team and HO Delivery Manager, not by me.
14. There was a lack of capacity to undertake contract monitoring activities within the on-site Home Office team. The formal monitoring that was undertaken focussed mainly on staffing levels, measured in hours, declared by G4S. I am not aware that the team were directed to focus on staffing but staffing levels are a key aspect of the contract.
15. Contracted key performance indicators and self-declaration by G4S formed the principal method of assessing performance. These were reviewed on a monthly basis. The Centre Manager was required to produce a monthly report. Service performance was discussed and agreed at a monthly meeting between G4S and the HO on-site team together with the HO Commercial team. The Commercial team produced a commercial dashboard outlining headline issues. This was submitted to the Director of DES on a monthly basis. There were also weekly and quarterly meetings.
16. In addition to the performance indicators and contractual terms, the overall care and welfare of the detained persons at Brook House was considered through methods such as the safer detention report, as well as reports from the IMB and HMIP.

17. The Home Office were not required to report to anyone on overall welfare as such, but responses were required to concerns raised by the IMB or HMIP.

Adults at Risk policy and Rule 35 Process

18. I have limited knowledge or experience of the practical implementation of either the Adults at Risk policy or the Rule 35 process, as neither I nor my teams were involved in decisions to detain, or to maintain detention.
19. The Adults at Risk policy was designed and intended to protect vulnerable people and was implemented in 2017. It is my impression and belief that it went some way to doing that. However, this is a very complex area in which real improvements could only really be achieved through an iterative process. Changes have been made to the policy since its introduction and its operation is subject to annual review by the Independent Chief Inspector of Borders and Immigration.
20. I am unable to directly comment on the impact of the Adults at Risk policy on caseworking teams. The policy stated that there is a presumption that somebody considered to be at risk should not be detained.
21. I have no recollection of being made aware of any concerns about the operation of the Adults at Risk policy or the Rule 35 process at Brook House between April and August 2017.

Detainee Forum Meetings

22. I am aware that detainee forum meetings were held at Brook House but I was not involved in these meetings so am unable to comment on frequency, management, attendance or effectiveness.

Complaints

23. The policy on handling complaints within the Immigration Detention Estate is set out in Detention Service Order 3/2015 [CJS000727].

24. A detained person may make a complaint verbally to a member of G4S or Home Office staff or to a member of the IMB. There are yellow boxes for written complaints throughout the IRC. These are to be checked daily by the on-site Home Office team. Forms for complaints to be submitted on are widely available around the IRC although a complaint does not need to be on one of these forms to be considered as such and responded to.
25. People not in detention, friends/family and NGOs are able to raise concerns in writing either with the centre supplier or directly with the Home Office.
26. As part of my role I am responsible for commissioning PSU investigations into allegations of serious misconduct against supplier staff or Home Office staff within my command structure. In considering whether to commission a PSU investigation I take account of the nature and level of seriousness of the allegation, potential impact on the individuals involved and the degree to which an independent investigation is needed to establish facts and resolve the concerns raised. Guidance on the commissioning of investigations is set out in DSO 2/2020 Commissioning Investigations and Management Reviews. Internal or local investigations and PSU investigations are not mutually exclusive. A PSU investigation into the actions of supplier staff may follow an investigation by supplier management (in this case G4S). Alternatively, depending on the circumstances involved, a PSU investigation may be commissioned immediately after the allegation or incident in question has come to light. The relevant time to commission an investigation is decided on a case-by-case basis. If an employer is investigating (or even more so in the case of the Police) it may be beneficial to await the outcome in some cases. For example, an investigation by an employer may be able to conclude quicker than the PSU and has the benefit of the relevant supplier 'owning' the issue and potentially leading to swifter action in response. In my opinion the multiplicity of potential scenarios means that this needs to be a case-by-case determination.
27. On completion of a PSU investigation I will consider the findings and appropriate action required. This consideration may include consultation with Home Office colleagues or the Supplier Centre Manager as appropriate.

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28. I have commissioned a number of PSU investigations and management reviews in the last 6 years, including PSU investigations undertaken in response to the behaviours of G4S staff revealed in the Panorama programme. For example, I commissioned the PSU investigations into allegations made by D668 that between 29 June and 27 September 2017 Brook House staff were rude and ignored his complaints regarding other detainees and that the toilet facilities were inadequate and lacked privacy [HOM002748]; and an allegation made by D687 that officers at Brook House used excessive force on 13 May 2017, were verbally and racially abusive during his detention and the healthcare was inadequate [HOM002725]. The Inquiry will see the outcome of the investigations in the reports referenced above.
29. Where allegations against staff are substantiated by investigation the matter is referred as appropriate to the G4S centre manager, head of healthcare or appropriate Home Office line manager to consider action. This was the case in respect of the allegations made by D688 which were found to have been substantiated. In the case of the allegations made by D687 none were found to have been substantiated.
30. In commissioning PSU investigations I consistently include within the terms of reference the identification of lessons to be learned and development of recommendations for improvements. In the examples of investigations mentioned above, recommendations were made in both cases. These recommendations were for improvements to, and updating of, G4S and Home Office policy documents, processes and training and environmental and security issues. There were also specific recommendations relating to the training of named G4S and Home Office staff associated with the events in question and clarification to them of the requirements of a number of policies. I believe that all but one of these recommendations were accepted. Where accepted, recommendations are assigned to a team, individual or organisation to own and deliver, for example the centre operator, Home Office Delivery Manager or Home Office Policy Team. Responsibility for monitoring progress against recommendations locally rests predominantly with the on-site Home Office compliance team with central oversight provided by the Detention and Escorting Services Corporate Oversight and

Operations Team. I am not in a position to personally verify whether all of the appropriate actions required to implement the recommendations were undertaken. However, Home Office records show that the accepted recommendations for the Home Office and those general recommendations for G4S, that is those that were not specific to individual officers, have in the vast majority of cases been actioned and completed. I am unable to comment on the recommendations and actions relating to individual G4S officers. HOM0331948

31. An example of where I have had some involvement with the G4S complaints process would be where, if I disagreed with the outcome of a G4S investigation, I might take further steps (for example where G4S considered a written warning an appropriate sanction for a DCO but I thought that insufficient I might take steps to revoke that individual's DCO certification). I recall that I did this in response to the decision to issue written warnings to some staff (instead of dismissal) following investigations of events featured in Panorama. On conclusion of the investigations into the cases of Derek Murphy, Sean Sayers and Steve Webb, G4S senior managers concluded that an appropriate sanction for each would be the issue of a final written warning. Having had their Home Office DCO certification suspended at the outset of the investigation it would have been necessary for the Detention and Escorting Services Certification Team to reinstate certification before these individuals could return to work. On reviewing the allegations and G4S investigation reports with the Certification Team, I was of the view that the behaviour of these individuals, behaviour for which their employer had issued sanctions, was such that it was not appropriate for them to work as Detainee Custody Officers. I therefore agreed with the certification team that their certification as DCOs would be revoked.
32. Whilst there may always be room for improvement in a system such as this, I have no specific recommendations for concrete steps which could be taken to improve the complaints process at this stage, although I will follow the evidence that is heard in the Inquiry and would be happy to comment further.
33. Complaints associated with conditions or facilities within the IRC will be handled locally by the suppliers (G4S) in so far as they are responsible for provision. Such

complaints can be handled formally or informally when resolution might be swift. People in detention may also raise complaints about any issue with the Home Office through the system described above or to the Independent Monitoring Board. Complaints to the Home Office will be handled in accordance with the DSO. Complaints about progression of someone's immigration case will be handled by the relevant caseworking command.

34. Complaints about healthcare provision or the behaviour of healthcare staff are handled under a separate NHS process. Links to advice on how to make complaints about healthcare provision are included within the HO DSO.

Meeting with Permanent Secretary 20 February 2018

35. A meeting took place to discuss PSU investigations and Brook House on 20 February 2018. I do not have a copy of minutes of the meeting and do not recall ever having received any such minutes. However, action points were reported from the meeting and taken forward at a senior level (I understand that the Home Office has been asked to provide a corporate statement which can no doubt address this).

HOM0331949

36. The note from me to Patsy Wilkinson, then Second Permanent Secretary at the Home Office (HOM0331707) is incorrectly dated 22 March 2017 through a typographical error. The correct date for this note was 22 March 2018. I was the author of this note but was supported in its production and furnished information to include in it by a number of colleagues within Detention and Escorting Service and the Home Office Professional Standards Unit.

HOM0331947

37. In the "next steps" section of this note I set out that we will continue to monitor closely the implementation of the G4S action plan. This action plan was developed by G4S in response to the events in the Panorama broadcast rather than any individual complaint. Monitoring of progress against the plan was undertaken through my attendance at the regular G4S action plan project board, along with Michelle Smith, HO Service Delivery Manager for the Gatwick IRCs. Detailed monitoring was undertaken primarily by the Home Office on-site compliance team.

38. The action plan alluded to in the next steps section of my note to Patsy Wilkinson was quickly subsumed into business as usual activity within the Home Office teams involved, primarily Detention and Escorting Services. Much of it related to the approach taken to compliance monitoring and assurance delivered by on-site compliance teams and the Detention and Escorting Security Team. A particular element was work to identify potential risks from staff working in the detention estate. This led to the establishment of a monthly reporting system and data set associated with allegations of misconduct against Detainee Custody Officers. This data is provided by the IRC suppliers and collated and disseminated to Home Office Service Delivery Managers in the IRCs by the Detention and Escorting Services Corporate Oversight and Operations Team. Where this indicates there may be cause for concern, for example several complaints against one officer, it will form the basis of a discussion between compliance teams and supplier senior managers. This process is separate but related to the processes for complaints and initiating investigations discussed above. I do not use the phrase 'business as usual' here to mean that it was not important, indeed it was *so* important that it became an integral part of routine practice.
39. In respect of the PSU investigation report CJS001506 _pp.20-37, had the reporting system outlined above been in place around the time of these events, the officer at the centre of the investigation would have been under scrutiny because of the number of previous complaints against him. This scrutiny would have involved a discussion with, and challenge of, G4S senior managers as to the behaviour of the officer concerned and why so many complaints had been received. At this point, however, I cannot say categorically that this scrutiny would have resulted in action which would have prevented the incidents set out in CJS001506_20-37.

Contact with Detained Persons

40. I have no recollection of any specific contact with any person detained at Brook House during this period.

Culture

41. I am unable to comment on the question of whether there was an identified culture across Brook House, either as a whole or in any department, area, or wing, during the relevant period. I did not observe any such identified culture during my visits to the centre.
42. I am unable to comment on G4S staff morale prior to the relevant period. From the time I spent on site immediately prior to and after the airing of the broadcast it is my perception that staff morale was low, but I am unable to give specific details. I am unable to comment on the morale of healthcare staff. My perception of Home Office staff morale is that it appeared good during my visits to site in 2017, but that this also suffered following the broadcast of the programme. It is my impression from discussions and being in the centre that staff were surprised and shocked by what the broadcast showed, that they felt let down or in some sense betrayed by the behaviour of a few and that their hard work with residents had been undermined. It is also my impression that the way in which this behaviour was exposed, through secretive filming, added to those feelings among staff.
43. In terms of attitude towards detained persons, on my visits to Brook House I always found the attitude G4S staff displayed to the people who were detained there to be professional. The attitude of Home Office staff at Brook House was also professional.
44. I do not recall having any particular concerns about how the values of G4S and or the Home Office or its culture impacted the general protection of those who were detained, the management of staff, or the protection of especially vulnerable detained persons.
45. I do not think I am in a position to comment on the management and leadership culture at Brook House. I have no particular opinions upon it.
46. I do not recall becoming aware of any occasions in 2017 where someone raised concerns about the treatment of detained persons (either individuals or collectively) whether informally or as a "whistleblower". I do recall a more recent incident where

a PSU investigation was commissioned after one of my team reported concerns, and another where an NGO report resulted in an investigation and disciplinary action.

47. I do not recall being aware of any racist, homophobic, or misogynistic attitudes or behaviours amongst G4S or Home Office Staff. I do not recall being aware of any staff bringing drugs into Brook House for use by detained persons. I do not recall experiencing, nor being aware of, any bullying by any other staff (G4S or Home Office) relating to Brook House.

Oversight, Monitoring and Outside Involvement

48. In November 2016, HMIP carried out an inspection of Brook House. The report of this inspection contained 46 recommendations. The Home Office accepted or partially accepts 33 of these recommendations and rejected 6. Of the rejected recommendations I believe two (R5.8 and R5.10) were, and remain, operationally impracticable; two (R 5.24 and R5.40) were and remain inconsistent with Home Office policy; one (R5.12) was considered not to be viable but is being reconsidered now, and the final one (R 5.23) has been delivered in part through changes in the new contract. Of the recommendations which were accepted or partially accepted Home Office records through which action against such recommendations are tracked show that all were completed or partially completed. In the majority of cases and those that relate to G4S training and processes and issues relating to maintenance factors within the IRC I am unable to comment further. In so far as the other recommendations are concerned, some, for example that relating to use of force being proportionate and necessary (R5.18) and that stating that security should be proportionate to the risk posed by the detained population (R5.22) are and remain Home Office policy. Certain other recommendations I can confirm were implemented, for example the development of a drug and alcohol strategy (R5.35).

49. I did not receive any complaints relating to victimisation by staff. If such complaints were made they would have gone into the complaints process, and would not come to me.

50. Independent Monitoring Boards, referred to as the Visiting Committees within the Detention Centre Rules 2001, are independent voluntary bodies appointed by the Secretary of State to monitor the treatment and conditions of people in detention. IMB members have unfettered access to an IRC and the people detained in an IRC, together with records relating to an individual's time in detention. IMB members visit the IRC and inspect aspect of the treatment and conditions for detainees on a regular basis. Board members produce reports of their visits and escalate any specific concerns to the Centre Manager, on-site Home Office team or me as necessary. IMBs produce an annual report for the Secretary of State which is published on the IMB web site.
51. My local team attend the monthly IMB meeting and I have occasional contact with chairs and members when on site. I meet all IMB chairs at their quarterly meeting where they have the opportunity to raise any issues and concerns.
52. The Gatwick Detainees Welfare Group are a charitable "befriending group" who visit the IRCs and provide personal support and assistance to those in detention. I do not recall having direct interactions or communications with them.
53. Medical Justice are a charitable organisation providing independent advice and reports for people held in detention. I have had contact with Medical Justice on a number of occasions and, as I recall, these have largely been in response to Medical Justice raising a concern about an aspect of process or procedures or about the treatment of an individual within the immigration detention estate.
54. Bail for Immigration Detainees are an independent charity which campaigns against immigration detention and which provides legal advice and representation to migrants detained in removal centres and prisons. I do not recall having direct interactions or communications with them.
55. In terms of other external organisations (external to the Home Office), Her Majesty's Chief Inspector of Prisons and the Prisons and Probation Ombudsman also had responsibilities in respect of IRCs including Brook House. In addition, the Independent Chief Inspector of Borders and Immigration has responsibilities with

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regard to the operation of the immigration system in respect of those held in detention.

Training

56. When I commenced my current role I did not undertake any specific training. As a Home Office manager I have undertaken a range of training associated with for example, leadership, equality and vulnerability.

Relationship with G4S Staff

57. My working relationship with G4S staff was predominantly with the senior managers at Brook House and Tinsley House and with their managers. In working with them I found their approach to be professional and positive.

Staffing

58. At the time in question I do not recall having any particular concerns about the adequacy of DCO staffing levels at Brook House. Reported attrition levels were steady and at about average levels. There was a slight rise in reported service credits but nothing significant. I do not recall staffing levels being raised as a particular issue, in terms of whether the contractual requirements were being met. Having said that, with hindsight what the contract required was insufficient to enable the optimum delivery of all that was expected of staff. For example, while it is my belief that the staffing levels were sufficient to operate the centre safely and securely, it now seems clear to me, and this is reflected in the Verita report, that staff needed more time and space to respond more effectively to the needs of people in detention. It is my opinion that such additional time and space could best be provided through an increase in staffing levels.

59. I am unable to speculate as to the impact of any staff shortages on the care and treatment of detained persons. I am also not able to give an assessment of any actual impact of staff shortages on G4S, as I do not recall observing any such impacts. However, in general terms staff shortages can result in increased pressure on other

staff to cover shifts, increased overtime, and tiredness. It is possible that such pressure may have meant that some staff did not have as much time to engage with residents as they might otherwise have done.

60. I am unable to comment on the staffing levels of the healthcare team. Healthcare was commissioned by NHS England.

61. I am unable to comment on the staffing levels of the activities team. I do not know if there were specific shortages in this area, or if it had any specific impacts.

Use of Force

62. I did not witness any uses of force during the relevant period. I would have been aware of use of force incidents reported as incidents through weekly HO reporting mechanisms. I recall one specific incident in which a detained person had jumped on to the netting on one of the wings in protest at having his flight cancelled and was brought down with the assistance of the HMPPS National Tactical Response Group. I believe there would have been a hot debrief and follow-up review of this incident but I was not involved and do not know what the outcomes were.

63. My concerns about the incident referred to above did not relate to the use of force but to the circumstances which led to the individual's flight being cancelled and prompted his protest on the netting. The flight was cancelled because an emergency travel document had not been obtained prior to him being taken to the airport for his flight. It was due to be collected from the relevant consular mission but was not available on the day. I cannot recall whether I had other specific concerns about other incidents I became aware of.

64. My opinion on the use of control and restraint techniques as a mechanism to control the behaviour of detained persons is that use of force is unfortunately necessary at times. It is necessary to ensure the safety of staff, other residents and the individual on whom the force is being used. It should be a last resort, proportionate and only used for the minimum necessary time. Control and restraint techniques are used across the Prison Service and immigration detention estate. Use of force should be

a last resort. Discussion, engagement and de-escalation techniques should if possible be used by staff prior to use of force. I have no recollection of being concerned that C&R techniques were used excessively at Brook House and I do not believe they were.

Detained Persons as time served foreign national offenders (TSFNOs)

65. The day-to-day management of the population in an IRC is outside of my remit and knowledge, so I cannot answer all of the Inquiry's questions on this topic. However, I would observe that TSFNO is a broad label and includes people who have received relatively short prison sentences for what might be considered relatively minor offences as well as those convicted of more serious offences. Only those TSFNOs who are assessed as suitable for the IRC estate are transferred into it at the end of their sentence. Many of the non-TSFNO people detained in IRCs have very little known about them or their activities in or beyond the UK including overseas convictions. The Immigration detention estate does not have the capacity to provide segmented accommodation based on "type" of detainee.

Abuse of detained persons

66. I do not recall having any specific concerns about abuse of detained persons at Brook House. I am aware that at times allegations of mistreatment or assault were made against staff and that these were investigated in accordance with the complaints procedure I have already discussed. I am also aware that at the time of the Panorama broadcast some of the staff identified were under investigation by PSU following allegations from persons detained at Brook House. It is my perception that allegations of mistreatment or abuse against staff working in custodial or detained settings are not uncommon. In my experience and as recorded in PSU investigation reports, once investigated, a significant proportion of allegations made against staff working in IRCs are found to be unsubstantiated although, some of the behaviour shown in the Panorama documentary was clearly unacceptable.

67. I had no specific concerns about the abuse (verbal or physical) of detained persons (either individually or collectively) at Brook House by other detained persons.

The Panorama Programme

68. I was not based at Brook House and did not know Mr Tulley.

69. I do not appear in the programme.

70. The members of the management team I engaged with were clearly shocked and very disappointed about what they had seen on the footage. The overwhelming reaction of the wider staff group portrayed by this senior team to me was one of betrayal – that the behaviour of a few individuals should undermine the hard work of so many others. There was also a sense of surprise and anger that Mr Tulley having witnessed certain incidents as a DCO chose to continue filming them rather than intervene.

71. I was in Brook House during the day on which the Panorama programme aired. It was very apparent from the conversations and comments in one of the exercise yards that residents were aware that there was a television programme that night and that it would say things about Brook House. It was my impression that there was a sense of expectation among residents. To me the atmosphere in the IRC felt tense.

72. In order to respond to any concerns residents may have following the broadcast G4S and the Home Office team arranged to hold drop-in sessions around the IRC the following day. As I recall these were communicated to residents by posters and leaflets and by Home Office and G4S managers walking around the centre and informing people in person. I do not recall all of the concerns raised by residents the following day but to the best of my recollection a number of people were worried about remaining in Brook House in light of what they had seen on the television.

73. Following the Panorama programme, a G4S action plan was put in place shortly after the programme aired. Delivery of this was overseen by a project board on

which I was one of the two Home Office representatives. This action plan was broad ranging and included staff recruitment and retention, staff training, structures and deployment, reporting processes and governance, substance misuse and the welfare and experiences of detained persons. In line with the plan many changes were put in place and staff recruited and from what I can judge I believe the plan to have been successful in achieving its aims. I believe this view to be supported by the comments HMCIP made in the foreword to the report of the inspection of Brook House in May/June 2019.

Specific Individuals

74. I did not work with and did not know any of the named individuals.

Suggestions for Improvements

75. The Inquiry is focussing on events that occurred over four years ago. Much has changed since then – as a result of the G4S action plan, but also because of reports such as the Lampard/Veritas report and the associated response together with Stephen Shaw’s follow up review. These changes are not confined to Brook House but to the whole of the immigration detention estate.

76. The new contract and new contract requirements with the Home Office mandated staffing levels in front-facing roles, a much stronger emphasis on detainee welfare, and a focus on staff culture and behaviour. In addition, and as I have referred to earlier, the Home Office teams on site have been strengthened, as they have been in other IRCs, and the Compliance Team is focussed on monitoring the delivery of this new contract along with assurance on the overall operation of the IRC and the welfare of those detained there.

77. I consider these changes to have been effective. I have no further changes or improvements to suggest to improve the health, safety and welfare of detained persons.

<u>Statement of Truth</u>	
<p>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.</p> <p>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.</p>	
Name	Alan Gibson
Signature	Signature
Date	01 November 2021

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