

BROOK HOUSE INQUIRY

Second Witness Statement of Alan William Gibson

I provide this statement in response to a request under Rule 9 of the Inquiry Rules 2006 dated 3 February 2022.

I, Alan William Gibson, date of birth [DPA] Head of Casework Academy Consolidation, Asylum Operations, Home Office, 6th Floor, Lunar House, 40 Wellesley Road, Croydon CR9 3RR. will say as follows:

Introduction

1. Prior to taking up my current role on 29 November 2021, I was Head of Operations for Detention and Escorting Services within Immigration Enforcement. I held this position from September 2015 until 29 November 2021.
2. 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.
3. The answers provided below are to the best of my knowledge and recollection, with reference to the documents noted in the Rule 9 request that have been made available to me 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.
4. As the Inquiry will see, I have had to answer quite a large number of questions in a way which makes clear that I was not involved in a particular action or was not aware of certain concerns. This reflects the nature of my role, which was to oversee the operation and service delivery across the UK of 9 Immigration Removal Centres, the Pre-departure Accommodation for families, 2 residential short-term holding facilities and numerous holding rooms including those in place at the juxtaposed border control in

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France. Also to have oversight of the delivery of escorting services within the UK and the provision of escorts for enforced removals from the UK. The breadth and scale of the role made it impracticable for me to be routinely involved in the detailed operation of individual establishments or the services provided. This is the reason I have been unable to provide greater detail rather than a lack of concern for the particular issue raised by the Inquiry.

Detention Service Orders

5. At the time of writing this statement there are 59 Detention Service Orders (DSOs) in existence. The subject matter of DSOs ranges from the fingerprinting of detainees (DSO 4/2012) and detainee access to the internet (DSO 16/2020) to the management of adults at risk (DSO 12/2019) and food and fluid refusal (DSO 3/2017). In my role as Head of Operations within Detention and Escorting Services I did not routinely monitor the operation of DSOs at each IRC or short-term holding facility. That is the role of the on-site Home Office compliance team or contract monitoring team in the case of escorting services.

DSO 03/2016 Consideration of Detainee Placement in the Detention Estate

6. The purpose of DSO 03/2016 is to ensure that all staff within the Home Office immigration detention estate are aware of the roles of Border Force, Immigration Compliance and Engagement (ICE) and Criminal Casework (CC) teams in identifying an individual's risk factors and the responsibility of the Detainee Escorting and Population Management Unit (DEPMU) for carrying out the actual risk assessment for placing that individual in an immigration detention facility.
7. As I have mentioned above, as Head of Operations for Detention and Escorting Services I did not routinely monitor the operation of DSOs at each IRC. However, I have no recollection of being made aware of any concerns about the operation of this DSO between April and August 2017 at Brook House.
8. Decisions to initially detain people or maintain immigration detention are the responsibility of case owning units and the Immigration Enforcement Detention

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Gatekeeper and not Detention and Escorting Services. I was not therefore involved in decisions to maintain detention for people accommodated in Brook House nor was I routinely informed of these decisions.

DSO 12/2012 on Room Sharing Risk Assessment

9. The purpose of DSO 12/2012 is to provide instruction and guidance to staff working in Immigration Removal Centres and residential short term holding facilities on how to identify and assess the risk one detainee poses of killing, seriously assaulting or causing mental or physical harm to another detainee when locked in a shared area.
10. As Head of Operations for Detention and Escorting Services I did not routinely monitor the operation of DSOs at each IRC. However, I have no recollection of being made aware of any concerns about the operation of this DSO between April and August 2017 at Brook House.

DSO 06/2013 Reception, Induction and Discharge Supplementary Guidance and Checklist

11. The purpose of DSO 06/2013 is to provide Home Office and centre supplier staff with guidance on the process for admitting, inducting and discharging a detained person from an immigration removal centre, short term holding facility or the pre-departure accommodation.
12. As Head of Operations for Detention and Escorting Services I did not routinely monitor the operation of DSOs at each IRC. However, I have no recollection of being made aware of any concerns about the operation of this DSO between April and August 2017 at Brook House.
13. As regards documents CJS006045 and CJS006046, I do not recall having seen these G4S documents before now. I am not in a position to say whether these policies operated effectively but in so far as they reflect published DSOs I would have expected to be alerted by the Home Office on-site team to any consistent or serious failings. I have no recollection of being made aware of any concerns in that regard.

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DSO 06/2008 Assessment Care in Detention and Teamwork (ACDT)

14. As Head of Operations for Detention and Escorting Services I did not routinely monitor the operation of DSOs at each IRC. However, I have no recollection of being made aware of any concerns about the operation of this DSO between April and August 2017 at Brook House.
15. As regards document CJS006380, I do not recall having seen this G4S document before now. I am not in a position to say whether these policies operated effectively but in so far as they reflect published DSOs and relate to the serious matter of harm prevention I would have expected to be alerted by the Home Office on-site team to any consistent or serious failings. I have no recollection of being made aware of any concerns in that regard.
16. I have been asked about documents PPG000101 and SER000038. PPG000101 is a version of DSO 04/2020 – Mental Vulnerability and Immigration Detention: Non-clinical Guidance, dating from July 2020. I am asked to summarise the changes made to this DSO, but it appears that this is the first version of this DSO which was published. SER000038 is a Serco policy document detailing the Gatwick IRC Vulnerable People Strategy. I do not recall having seen this Serco document before now. I have not been Head of Operations for Detention and Escorting Services since the end of November 2021. I am therefore unable to comment on the current operation of the DSO, but as at the time I left I was not aware of any concerns about its operation at Brook House.

Adults at Risk Policy: documents CJS000731 and CJS000540

17. The Adults at Risk in Immigration Detention (AAR) policy enables officials to identify individuals who may be vulnerable in detention and provides a framework for assessing the appropriateness of their detention by balancing vulnerability against immigration factors – the timeline for removal, the risk of non-compliance with immigration law and the risk of offending.
18. I approved the DSO at document CJS000731 on behalf of Detention Operations.

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19. As regards document CJS000540, I do not recall having seen this G4S document before now. I am not in a position to say whether these policies operated effectively but in so far as they reflect published DSOs and relate to the serious matter of harm prevention I would have expected to be alerted by the Home Office on-site team to any consistent or serious failings. I have no recollection of being made aware of any concerns in that regard.
20. I have limited knowledge or experience of the practical implementation of the Adults at Risk policy as neither I nor my teams were involved in decisions to detain, or to maintain detention.
21. 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.
22. 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.
23. I have no recollection of being made aware of any concerns about the operation of the Adults at Risk policy at Brook House between April and August 2017.
24. I have been asked about document SER000270 which is a version of DSO 08/2016 – Management of Adults at Risk in Immigration Detention, dated July 2018. According to the revision history, the changes which were applied during this revision were to reflect the establishment of Pre-Departure Teams in IRCs and clarify responsibilities in relation to the DSO requirements. I approved this DSO on behalf of Detention Operations. I have not been Head of Operations for Detention and Escorting Services since the end of November 2021. I am therefore unable to comment on the current operation of the DSO, but as at the time I left I was not aware of any particular concerns about its operation at Brook House.

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Rule 35

25. DSO 09/2016 is intended to ensure that all staff working in IRCs or residential STHFs and those Home Office staff responsible for maintaining and reviewing detention understand the purpose of rule 35 (in relation to IRCs) and are aware of the procedures for recording and dealing with such reports.
26. The DSO on Rule 35 was developed and owned by the Home Office Migration and Borders Removal, Enforcement and Detention Policy team which sits outside Detention and Escorting Services. To the best of my recollection I had no involvement in the development or approval of the DSO dated 06/12/2016 at document HOM002591.
27. 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.
28. 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.
29. I am unable to comment on the Home Office's response to Rule 35 reports as neither I nor my teams were involved in decisions to detain, or to maintain detention.
30. To the best of my recollection I had no involvement in the development or approval of the revision to the Rule 35 DSO dated March 2019 at CJS007075. As I have mentioned above, the DSO on Rule 35 was developed and owned by the Home Office Migration and Borders Removal, Enforcement and Detention Policy team which sits outside Detention and Escorting Services. Page 4 of the DSO states that the changes from the previous DSO involve clarification of references to the definitions of torture.
31. As Head of Operations for Detention and Escorting Services I did not routinely monitor the operation of DSOs at each IRC. However, I have no recollection of being made aware of any concerns about the operation of this DSO between April and August 2017 at Brook House. I have not been Head of Operations for Detention and Escorting Services since the end of November 2021. I am therefore unable to comment on the current operation of the DSO, but as at the time I left I was not aware of any particular concerns about its operation at Brook House.

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Food and Fluid refusal

32. The purpose of DSO 03/2013 is to provide guidance to Home Office and contracted service provider staff, (including healthcare staff) on how to deal with any adult foreign national, detained under immigration powers in an IRC, who meets the definition of a food and/or fluid refuser.
33. I was not in post as Head of Operations in Detention and Escorting Services when DSO 3/2013 was developed and issued.
34. DSO 03/2013 was replaced by DSO 03/2017 version 1 published on 23 October 2017 (CJS000724). This version of the DSO was owned and developed by the Home Office Migration and Borders Removal, Enforcement and Detention Policy team which sits outside Detention and Escorting Services. I have no recollection of having any particular involvement in the development or approval of this document.
35. DSO 03/2017 version 1 was replaced by DSO 03/2017 version 2 published in September 2019 (CJS007070). This version, version 2, of the DSO was owned and developed by the Corporate Operations and Oversight Team of Detention and Escorting Services. I approved version 2 of the DSO on behalf of Detention Operations.
36. I have been asked about document SER000053, which has not yet been provided to me. Upon receipt of this document I will consider it and provide a response.
37. As Head of Operations for Detention and Escorting Services I did not routinely monitor the operation of DSOs at each IRC. I did receive a copy of the daily food and fluid refusal log from Brook House between April and August 2017. This indicated to me that procedures were being followed and I have no recollection of being made aware of any concerns about the operation of this DSO at Brook House during the period in question.
38. In publishing DSO 03/2017 in October 2017 I understand the policy had a number of changes and clarifications from the earlier 03/2013 document. These included: a definition of a food or fluid refuser and guidance on establishing a detainee's motives for engaging in protest through food and fluid refusal. It also included guidance on establishing multi-disciplinary team meetings to consider the management and

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wellbeing of individuals refusing food or fluids. There was also clarification of the requirements for reporting and assessment of each person's health status against a black, red, amber, green (BRAG) rating process.

39. The September 2019 version of DSO 03/2017 included updates to reporting documents and clarification of roles within the Home Office on-site teams in recognition of the establishment of the Pre-Departure Teams (now known as the Detainee Engagement Teams). There was also the inclusion of a new letter to be issued to those refusing food or fluid and updates to reporting and escalation logs.

E wing Policy

40. I have considered the E-Wing policy at CJS006043. I am aware that G4S operated E Wing differently to other wings at Brook House and that it was used to accommodate individuals who might have needed closer management or support than might have been available on other wings. As Head of Operations for Detention and Escorting Services I did not routinely monitor the operation of local supplier policies. However, I have no recollection of being made aware of any concerns about the way in which G4S operated E Wing at Brook House between April and August 2017.

Rules 40 and 42

41. DSO 20/2017 is intended to provide instruction and guidance on the use of removal from association (DC Rule 40) and temporary confinement (DC Rule 42). It indicates the administrative process that must be followed in use of the measures and provides a summary of existing practice.
42. I was closely involved in the development of this DSO reviewing several drafts and finally approving its issue on behalf of Detention Operations. Whilst I was involved with all aspects of the DSO my particular focus was on the operational practicality and clarity of requirements including, authorisation of use, review periods, escalation on review and record keeping.

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43. Use of Rule 40 and 42 are closely monitored by Home Office teams across the Immigration Detention Estate including at Brook House. This was also the case between April and August 2017. Uses of Rules 40 and 42 were and I believe still are reported at weekly meetings with suppliers and twice weekly at Detention Operations management calls. As Head of Operations for Detention and Escorting Services I did not routinely monitor the operation of the DSO at each IRC. However, I have no recollection of being made aware of any concerns about the operation of the DSO between April and August 2017 at Brook House.
44. DSO 02/2017 dated September 2020 contains changes from the earlier DSO in relation to restrictions on conditions for those held under Rules 40 or 42 such as removal of furniture or bedding from a room and the provision of shower facilities for those on dirty protest. The DSO also includes guidance on managing those with mental vulnerabilities and sets out the need for consideration of the guidance and assessment required under DSO 04/2002 Mental vulnerability and immigration detention. In addition it includes a requirement for suppliers to self-assess their compliance with the DSO.
45. I was involved in the development of these changes in particular the approval process and review periods for the application of restrictions on the conditions for those temporarily held under Rules 40 or 42. I approved the final text of the DSO on behalf of Detention Operations.
46. I have not been Head of Operations for Detention and Escorting Services since the end of November 2021. I am therefore unable to comment on the current operation of the DSO, but at the time I left I was not aware of any concerns about its operation at Brook House.
47. In respect of CJS000725 and CJS006401 I have no recollection of having seen these G4S documents before. I note that the last update recorded on each document predates the issue of DSO 20/2017 and it is not clear whether they were or needed to be updated to be consistent with the DSO. As Head of Operations for Detention and Escorting Services I did not routinely monitor the operation of local supplier policies. However, I have no recollection of being made aware of any concerns about the way in which G4S applied Rules 40 or 42 at Brook House between April and August 2017.

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Complaints

48. DSO 03/2015 is intended to ensure that all staff and suppliers within the Home Office immigration removal estate are fully aware of the complaints handling procedure. It also clarifies the handling, investigating and escalation processes for complaints relating to different agencies or areas of service.
49. I discuss the complaints process and my involvement in it at paragraphs 23 – 34 of my previous statement.
50. As Head of Operations for Detention and Escorting Services I did not routinely monitor the operation of DSOs at each IRC. However, I am aware of complaints being made and investigated at Brook House. I have no recollection of being made aware of any concerns about the operation of this DSO between April and August 2017 at Brook House.

Interaction with Brook House

51. To the best of my recollection and having reviewed my diary for the relevant period, I had no in person meetings with people in management roles at Brook House between March and August 2017. I did meet Jerry Petherick, Ben Saunders and Sarah Newland at Tinsley House and later at Brook House on 27 June 2017 in connection with a Ministerial Visit referred to below. I do not recall discussing anything other than the visit. Ben Saunders took part in a conference call with others on 27 June 2017 to discuss charter removal operations. It is likely that I was on the same conference call with G4S managers on a number of occasions during this period as a refurbishment of Tinsley House and the Pre-departure Accommodation for families were being finalised at that time. Over this period there would have been a number of telephone conversations with Ben Saunders and Jerry Petherick relating to operational matters such as the transfer of a highly disruptive detainee, an incident at height (referred to in paragraphs 62 and 63 of my previous statement) and a possible escape attempt.

52. During the period in question the contract for the operation of the Gatwick IRCs and the Pre-departure Accommodation was in the process of being re-let. There were

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regular meetings with a wide range of Home Office colleagues throughout the period on this subject. Brook House along with all other IRCs was discussed at routine management meetings chaired by me and at assurance meetings chaired by Clare Checksfield. The issues covered varied but typically included performance against the contract, progress of projects within each IRC and trends relating to use of force, safety and security. Throughout the period I had regular contact with Michelle Smith as I did with other IRC delivery managers, in which we would have discussed issues relevant to the operations of the Gatwick IRCs and the PDA and which to some extent would have reflected the discussions with Ben Saunders and Jerry Petherick referred to above. At this distance in time it is difficult to be more specific on detail.

53. The engagement I had with senior G4S staff referred to in page 21 of HOM0332000 is exemplified by the detail of my engagement with Jerry Petherick and Ben Saunders given above. The reference in HOM0332000 also relates to my involvement in the G4S Brook House Action Plan referred to in paragraph 37 of my earlier statement.
54. In respect of CJS000503 the Ministerial Visit referred to was a visit to the Gatwick IRCs, Tinsley House and Brook House, and Pre-departure Accommodation on 27 June 2017 by Minister Brandon Lewis shortly after his appointment as Immigration Minister. The visit coincided with the re-opening of Tinsley House IRC after a programme of refurbishment and opening of the adjacent Gatwick Pre-departure Accommodation for families. The feedback referred to in CJS000503 was, to the best of my recollection, oral feedback to the effect that the Minister had found the visit, his first to an IRC, interesting and informative.

HMIP

55. I had no interactions or involvement with HMIP in respect of their inspection of Brook House in 2016. My interaction with them in respect of the 2019 inspection was to attend the on-site feedback session on the final day of the inspection.
56. Following the broadcast of the Panorama programme Frances Hardy and I had a reflective conversation with Hindpal Singh Bhui of HMIP about the incidents and behaviours portrayed. This was an informal conversation and as such there were no

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formal actions or substantive outcomes, but, as I recall, we touched on issues relating to the Home Office response to the events at Brook House and how HMIP might seek to identify such problems in future inspections.

Panorama

Note to Patsy Wilkinson

57. I have been asked to comment on document HOM0331707. The document is a note from me to Patsy Wilkinson, then Second Permanent Secretary at the Home Office (HOM0331707), and 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.

58. The note summarises what the Home Office knew of serious allegations against Brook House staff in a period prior to the Panorama broadcast. It summarises the nature of the allegation, date the allegation was received, date the investigation by the Home Office Professional Standards Unit (PSU) was concluded and the outcome. It then summarises the action taken by G4S and the Home Office in respect of staff identified in the Panorama broadcast. It notes the dismissal of a number of G4S staff and the Home Office action when the sanctions G4S applied were considered to be insufficient. I referred to this last point in paragraph 31 of my earlier statement.

59. The latter part of the note summarises the Home Office approach to investigating the events shown on the Panorama broadcast and the commissioning of a number of PSU investigations following the subsequent receipt of a number of allegations of serious misconduct against staff at Brook House. The outcomes of the PSU investigation, where these were available in March 2018, is annexed to the note.

60. On the next steps section of this note I refer to paragraphs 37-38 of my previous statement.

61. The Inquiry have asked me to consider whether the Home Office had sufficient knowledge/understanding of the allegations made against DCOs during the relevant

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period (prior to Panorama). Where reported, I believe the Home Office did have sufficient knowledge and understanding of the allegations, but the Home Office could not have known about those incidents which were not reported, as is clearly evident from Panorama. As I have mentioned in my previous statement, it is my perception that allegations of mistreatment or abuse against staff working in custodial or detained settings are not uncommon. Some allegations are found to be substantiated when investigated as in the cases of D688 referred to in paragraph 29 of my earlier statement and D1527 referred to in CJS001107 and paragraph 76 below. However, in a significant proportion of cases insufficient evidence is available to substantiate allegations against the balance of probability. As Panorama showed, camera footage is obviously helpful to add weight to a complaint.

Emails from February 2018

62. CJS000736 this is the G4S Action Plan developed in response to the events shown on Panorama. As I have said in my earlier statement at paragraph 37 I, along with Michelle Smith, monitored G4S's progress in delivering this action plan through attendance at regular G4S action plan project board chaired by Jerry Petherick of G4S. Detailed monitoring of progress against actions was undertaken primarily by the Home Office on-site compliance team.
63. CJS000743 is a short series of emails in which Jerry Petherick informed Clare Checksfield and myself that Ben Saunders would be leaving G4S and that he would be replaced on an interim basis by Lee Hanford. Clare Checksfield responded acknowledging this situation and requesting an open competition for the permanent position. By this I believe Ms Checksfield meant she wanted G4S to be open to applications for the job from people who did not work for G4S. When the role was advertised I sat on the selection panel and a candidate external to G4S was appointed to the post.
64. CJS000747 is an email from me to Ben Saunders in which I advise him that the Home Office has spoken to the Chief Constable of Sussex and expressed its view of the importance of a swift investigation into the events at Brook House. This phone call was not made by me but by a senior Home Office colleague. I believe I had a further conversation with a senior officer within Sussex Police but cannot recall any detail other

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than requesting a quick response to the referrals made to them by G4S. To the best of my recollection and knowledge Home Office contact with the police thereafter rested with the PSU.

65. CJS000752 is an email chain exchange between Clare Checksfield and Jerry Petherick in which the need to establish all the facts about what was being alleged in the letters from the BBC to the Home Office was set out.
66. CJS000801 is an email from Clare Checksfield to IRC Centre Managers and other senior supplier and Home Office officials advising them of the forthcoming broadcast of the Panorama programme about Brook House. It was important that all centre managers were aware of the broadcast and ready to respond to any concerns from staff and any concerns or protests by detainees or the public. In the days surrounding the day of the Panorama broadcast I chaired a number of conference calls with Home Office and supplier colleagues across the estate to monitor any concerns from the detained population and any issues of stability within each IRC.

Document HOM0331949 and the G4S Action Plan

67. At page 3 of document HOM0331949 Hugh Ind, Director General of Immigration Enforcement at the time, posed a series of questions to Stephen Kershaw, Director of Director for Strategy and Transformation which included Detention and Escorting Services. The Inquiry has asked me to provide my response to these questions. Clare Checksfield formally wrote to Mr Ind to respond to his questions on 16 February 2018 [HOM0332125, HOM0332126, HOM0332127, HOM0332128, HOM0332129, HOM0332130]. I provide my own views and responses below.
68. I do not believe that G4S were going through the motions with their action plan. I believe that G4S senior management were deeply concerned by the events portrayed by Panorama and committed to follow through with the actions in their plan. I have already discussed how I attended their Action Plan project board with Michelle Smith and held them to delivering on their commitments. They made a great deal of early progress in a number of areas and implemented plans to deliver on medium and longer term actions such as recruitment and retention.

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69. I attended the Project Board as I have set out a above. I did not attend any of the staff surgeries or wing-based surgeries mentioned by Mr Ind in HOM0331949.
70. In relation to supplier staff integrity, I have discussed some of the action taken and new processes put in place in paragraph 38 of my earlier statement. In her response to Mr Ind of 16 February 2018, Ms Checksfield provided copies of the documents and examples he had asked for.
71. In regard to the work to separate the pre-departure teams (now known as Detainee Engagement Teams) and Compliance Teams on site in IRCs, I believe that Mr Ind was concerned that this was taking more time and effort than he thought it should have done and that there was a risk of creating boundaries that would hinder effectiveness. The separation of roles was complex at an operational level and resources and skills and experience took time to build. As with any change, some of the staff involved took time to adjust but the clear direction set for everyone involved was that this was an important change and that the two teams would work together effectively. I am aware that at Gatwick this process was approached with a positive and flexible attitude by the leaders and staff in both teams.
72. The reference to oversight of Tascor use of force is a query about whether it would be practicable to apply the same level of oversight to use of force in IRCs to that given to use of force under the escorting contract which, at the time, was held by Tascor. By way of background, there are two sets of techniques relating to use of force in place within the immigration detention estate. Within IRCs the techniques used are those of Control and Restraint (C&R) as deployed within the prison estate across the UK. When under escort by the Escorting Services provider the techniques used are that of the Home Office Manual of Escorting Safely (HOMES). HOMES was developed for the Home Office by what was the National Offender Management Service, now Her Majesty's Prison and Probation Service, following the tragic death of Mr Jimmy Mubenga during an escorted removal. It provides bespoke techniques for use on escort vehicles and aircraft. As part of the deployment of HOMES the Home Office appointed a use of force monitor whose role it is to review every instance in which HOMES techniques are deployed. The Home Office has not sought to mirror this approach with C&R but has instead appointed a nominated officer from the Home Office on-site compliance team in each IRC to monitor instances of use of force, challenge where

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necessary and escalate concerns to the Home Office Use of Force Monitor. The Use of Force Monitor is now a member of the Detention and Escorting Security Team.

73. The Inquiry has asked for details of my role and actions taken in respect of document HOM331995 entitled “Integrity, Professional Standards and Prevention: Lessons from Brook House”. This document was prepared by me and was provided to Patsy Wilkinson, Second Permanent Secretary at the Home Office, ahead of the meeting with her on 20 February 2018 referred to at paragraph 35 of my earlier statement. It draws together and summarises the various initiatives and activities which had been undertaken and which were underway following Panorama. These included the G4S action plan, the Verita (Lampard) review commissioned by G4S, Stephen Shaw’s follow-up review on the welfare of people in detention, actions taken with the Home Office supplier group across the detention estate, prevention strategies and a Home Office action plan. Having prepared this document I provided an update the following month to coincide with my note to Patsy Wilkinson at HOM0331707 referred to in paragraph 36 of my previous statement and paragraphs 57 to 61 above. There was no routine reporting against document HOM331995. As I explain in paragraphs 37-38 of my previous statement much of this was quickly absorbed not business as usual.

PSU Investigation into allegations by D687

74. I commissioned the Home Office Professional Standards Unit to undertake an investigation into the allegations made by D687 in a letter received from his legal representatives. I set the terms of reference for the investigation. The terms of reference were expanded following further allegations by D687 during the course of the investigation. I had no role in the investigation itself. On receipt of the final investigation report I forwarded it along with the other completed PSU investigation reports to Paul Kempster, Chief Operating Officer for G4S Custodial and Detention Service. I asked Mr Kempster for a formal response to be prepared and an indication on whether the content of the reports provided any or any additional concern about the DCOs involved and whether he considered anything needed to be added to the G4S action plan. I also forwarded the report to the team within Detention and Escorting

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Services who logged and monitored action on recommendations made by PSU following any of their investigations.

75. As set out in paragraphs 28-29 of my previous statement, the PSU investigation found all of the allegations made by D687 to be unsubstantiated. There were, however, a number of recommendations made to address failings identified in the procedures followed by both G4S and Home Office staff in respect of D687's time at Brook House. As I have set out in paragraph 30 of my previous statement most of these recommendations were accepted.

PSU Investigation into allegations by D1527

76. I commissioned the Home Office Professional Standards Unit to undertake an investigation into the allegations made by D1527. I had no role in the investigation itself. As in the investigation into the allegations made by D687, on receipt of the final investigation report I forwarded it to the G4S Manager responsible for custodial services, Paul Kempster. I asked Mr Kempster for a formal response to be prepared. I also forwarded the report to the team within Detention and Escorting Services who logged and monitored action on recommendations made by PSU following any of their investigations.

<u>Statement of Truth</u>	
I believe that the facts stated in this witness statement are true. I understand that proceedings for contempt of court may be brought against anyone who makes, or causes to be made, a false statement in a document verified by a statement of truth without an honest belief in its truth.	
I am content for this witness statement to form part of the evidence before the Brook House Inquiry and to be published on the Inquiry's website.	
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Signature	<div>Signature</div>
Date	25/02/2022

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