

<p>1 Wednesday, 16 March 2022</p> <p>2 (10.00 am)</p> <p>3 MR JULIAN PAUL WILLIAMS (affirmed)</p> <p>4 Examination by MS TOWNSHEND</p> <p>5 MS TOWNSHEND: Good morning, chair. We will be hearing from</p> <p>6 Mr Julian Williams this morning.</p> <p>7 Mr Williams, please could you give your full name to</p> <p>8 the inquiry?</p> <p>9 A. Julian Paul Williams.</p> <p>10 Q. Can I just ask you to make sure that -- I see you're</p> <p>11 leaning into the microphone. That's helpful. But if</p> <p>12 you can keep your voice raised so that everybody can</p> <p>13 hear you, that would be great. Ah, that's why we can't</p> <p>14 hear. The microphone isn't on. Thank you.</p> <p>15 Mr Williams, is it correct that you have provided</p> <p>16 two witness statements to this inquiry -- the first</p> <p>17 dated 7 March and the second dated 15 March?</p> <p>18 A. Correct.</p> <p>19 Q. Chair, may these two witness statements be adduced.</p> <p>20 Their reference numbers are <INQ000166> and <INQ000170>?</p> <p>21 THE CHAIR: Thank you, indeed.</p> <p>22 MS TOWNSHEND: Mr Williams, I want to first ask you about</p> <p>23 your background. Is it correct that you -- prior to</p> <p>24 working as a DCO, you were in the RAF for 13 and a half</p> <p>25 years?</p> <p style="text-align: center;">Page 1</p>	<p>1 Q. Just to give more of an overview, you also say in your</p> <p>2 first witness statement, paragraph 2, that you worked at</p> <p>3 Brook House until July 2018, when you said it was time</p> <p>4 to move on?</p> <p>5 A. Yes.</p> <p>6 Q. You now work for Mitie in Gatwick as a DCO overseas</p> <p>7 officer?</p> <p>8 A. It's MIT, not Mitie, but, yes, that's correct, yes.</p> <p>9 Q. You started that in February 2019?</p> <p>10 A. Yes.</p> <p>11 Q. Please could you tell us more about what that role</p> <p>12 involves?</p> <p>13 A. Basically, it means going to detention centres, or IRCs,</p> <p>14 and collecting detainees and putting them on planes to</p> <p>15 remove them back to their own countries.</p> <p>16 Q. In terms of the level that that is on, that was a DCO</p> <p>17 level and, prior to that, you were at a manager level?</p> <p>18 A. Yes.</p> <p>19 Q. So is that a demotion, then? Is that further down the</p> <p>20 tree than residential manager?</p> <p>21 A. Compared to the IRCs, yes.</p> <p>22 Q. I want to ask you now about your role as a residential</p> <p>23 manager. You say in your witness statement -- first</p> <p>24 witness statement, paragraphs 3 and 4, that it meant</p> <p>25 looking after the needs and welfare of detainee across</p> <p style="text-align: center;">Page 3</p>
<p>1 A. Yes.</p> <p>2 Q. You then joined Group 4, which was the predecessor,</p> <p>3 I assume, to G4S?</p> <p>4 A. Yes.</p> <p>5 Q. In September 1993, as a DCO?</p> <p>6 A. Yes.</p> <p>7 Q. Then, over the next 24 and a half years, you progressed</p> <p>8 from being a DCO to a supervisor to deputy shift manager</p> <p>9 to shift manager and then to residential manager?</p> <p>10 A. Yes.</p> <p>11 Q. You worked at Campsfield IRC, then Oakington and then at</p> <p>12 Brook House?</p> <p>13 A. Yes.</p> <p>14 Q. You became residential manager at Brook House in 2009,</p> <p>15 which was six months after Brook House had, in fact,</p> <p>16 opened?</p> <p>17 A. Yes.</p> <p>18 Q. When the appointments -- when you were appointed as</p> <p>19 residential manager, you say in your second witness</p> <p>20 statement, paragraph 3 -- no need to refer to it unless</p> <p>21 you need to -- that the role was advertised and you</p> <p>22 were -- then passed a selection process. Do you</p> <p>23 remember if that was advertised externally as well as</p> <p>24 internally?</p> <p>25 A. I don't know.</p> <p style="text-align: center;">Page 2</p>	<p>1 four wings?</p> <p>2 A. Yes.</p> <p>3 Q. You say that other areas of responsibility were paid</p> <p>4 work by detainees, activities, arts and education?</p> <p>5 A. Yes.</p> <p>6 Q. And day to day, this would mean attending meetings,</p> <p>7 holding disciplinaries, investigations, dealing with</p> <p>8 complaints, walking around the wings and activities</p> <p>9 corridor, talking to staff and detainees and inspecting</p> <p>10 the cleanliness of the wing?</p> <p>11 A. Yes, that's part of it, yes.</p> <p>12 Q. Is there any other part of it that I've missed?</p> <p>13 A. No. Doing everything, I think, was -- also, you'd have</p> <p>14 duty director as well on -- once a week.</p> <p>15 Q. So you would hold the role as a duty director, you say,</p> <p>16 once a week?</p> <p>17 A. Yes.</p> <p>18 Q. I assume then there were other duty directors who would</p> <p>19 hold that position on the other days?</p> <p>20 A. Yes.</p> <p>21 Q. Can you remember, in 2017, who those other duty</p> <p>22 directors were?</p> <p>23 A. Michelle Brown, Dan Haughton -- I can't -- I think</p> <p>24 Sara Edwards, I believe Steve Skitt may have picked up</p> <p>25 a few of the duties.</p> <p style="text-align: center;">Page 4</p>

1 (Pages 1 to 4)

<p>1 Q. Yes.</p> <p>2 A. Yeah.</p> <p>3 Q. You have said in your witness statement, the first</p> <p>4 witness statement, paragraph 23, in terms of training</p> <p>5 for the role, you say:</p> <p>6 "I was given any specific training for this role.</p> <p>7 I did shadow various managers for a short period of</p> <p>8 time."</p> <p>9 Can I just clarify with you, did you mean that you</p> <p>10 were not given specific training for your role as</p> <p>11 residential manager?</p> <p>12 A. No.</p> <p>13 Q. You were not?</p> <p>14 A. No. I shadowed the outgoing residential manager for</p> <p>15 a month.</p> <p>16 Q. Would you have found training to be a residential</p> <p>17 manager useful?</p> <p>18 A. As a residential manager, I don't know what training</p> <p>19 there was available. As a manager, then there should</p> <p>20 have been some training available.</p> <p>21 Q. Can we assume by the fact that you didn't get any</p> <p>22 training that there was no training available?</p> <p>23 A. I believe so, yes.</p> <p>24 Q. That there wasn't any?</p> <p>25 A. There wasn't.</p> <p style="text-align: center;">Page 5</p>	<p>1 Thirdly, you would have the detainee consultative</p> <p>2 meetings. And, fourthly, use of force meetings. Is</p> <p>3 that right?</p> <p>4 A. Yes.</p> <p>5 Q. I want to ask you specifically about a meeting that you</p> <p>6 were said to have attended in 2016. Michelle Brown, in</p> <p>7 her witness statement -- no need to bring it up on</p> <p>8 screen -- says at paragraph 119, <INQ000164>. She says</p> <p>9 you were in attendance during a meeting in January 2016</p> <p>10 where she raised concerns that G4S would have a similar</p> <p>11 issue to Medway, and, in particular, that -- because, of</p> <p>12 course, at Medway, there was abuse that was uncovered by</p> <p>13 an undercover journalist in a BBC Panorama programme.</p> <p>14 She says she raised that with Ben Saunders and</p> <p>15 Steve Skitt and that you were also present at the</p> <p>16 meeting as well as Stacie Dean. Do you recall that</p> <p>17 meeting?</p> <p>18 A. No. No. Not the contents of the meeting, no.</p> <p>19 Q. So you don't recall Michelle Brown raising the issue of</p> <p>20 Medway?</p> <p>21 A. No.</p> <p>22 Q. I want to ask you about use of force review meetings.</p> <p>23 You say in your first witness statement at paragraph 46</p> <p>24 that use of force was first reviewed by a C&R instructor</p> <p>25 and any learning issues were then reported. You said</p> <p style="text-align: center;">Page 7</p>
<p>1 Q. You were in the role of residential manager for ten</p> <p>2 years, right up until -- and the relevant period was</p> <p>3 right at the end of that period. So the relevant period</p> <p>4 being in 2017. What did you consider the challenges to</p> <p>5 have been for your role during that time?</p> <p>6 A. The needs of the detainees was a lot. Their demands was</p> <p>7 heavy. And even their attitudes was boisterous at</p> <p>8 times. So a lot of them didn't want to be there. So it</p> <p>9 was a case of trying to look after them the best we</p> <p>10 could, and provide the needs for them the best we could.</p> <p>11 The role in itself was very challenging. You had staff</p> <p>12 who were trying to deal with 120 detainees on a wing,</p> <p>13 going on and off the wing throughout the day. The</p> <p>14 cleanliness of the centre -- detainees to keep their</p> <p>15 rooms clean and tidy, where some would just graffiti</p> <p>16 their rooms. Just stuff like that, really.</p> <p>17 Q. I want to ask you now about the meetings that you were</p> <p>18 involved in. Firstly about meetings in general that you</p> <p>19 attended. You have said in your first witness statement</p> <p>20 at paragraphs 44 to 49 that you attended essentially</p> <p>21 four types of meeting. So the first were the morning</p> <p>22 meetings, which lasted -- which were the last 24 hours,</p> <p>23 rather, were discussed with senior management, DCMs, the</p> <p>24 Home Office facilities, healthcare, catering and IMB.</p> <p>25 Second, you would have the monthly security meetings.</p> <p style="text-align: center;">Page 6</p>	<p>1 that you don't know how often these meetings took place,</p> <p>2 but, firstly, a C&R instructor would look at the</p> <p>3 incident and any learning issues would be reported at</p> <p>4 these meetings. Senior management would then review</p> <p>5 these issues within the use of force paperwork, and then</p> <p>6 issues would be reported back to the C&R instructor to</p> <p>7 see if refresher training was needed.</p> <p>8 That use of force instructor, can you remember if,</p> <p>9 during the relevant period, that was Steve Webb?</p> <p>10 A. No, it weren't Steve Webb, no.</p> <p>11 Q. Who do you think it was?</p> <p>12 A. I believe John Connolly was one of them.</p> <p>13 Q. Yes.</p> <p>14 A. And Dave Killick. But over what period, I'm not sure.</p> <p>15 Q. Could Steve Webb have also been doing those reviews, do</p> <p>16 you know?</p> <p>17 A. Maybe, yes.</p> <p>18 Q. When you say they were first reviewed by use of force</p> <p>19 instructor, do you know if -- we heard evidence from</p> <p>20 Steve Webb that those reviews took place just on his</p> <p>21 own, and he was looking through the footage and,</p> <p>22 essentially, it was a tick-box exercise to review that</p> <p>23 footage and review the paperwork. Are those the</p> <p>24 meetings you're talking about, in terms of the use of</p> <p>25 force review meetings, or are you talking about an extra</p> <p style="text-align: center;">Page 8</p>

2 (Pages 5 to 8)

<p>1 layer of accountability above that?</p> <p>2 A. I believe that it -- when the reviews took place, they</p> <p>3 would sign them off to say that they've done the review,</p> <p>4 and then any issues or learning issues would then be</p> <p>5 sent up to a second meeting, which is attended by</p> <p>6 management, to review these issues and such paperwork</p> <p>7 and to see if there's any learning issues there, to make</p> <p>8 sure -- even if there weren't learning issues, to make</p> <p>9 sure everything was done correctly.</p> <p>10 Q. Did you attend those meetings?</p> <p>11 A. Yes.</p> <p>12 Q. You said you can't remember how often. Were they ad hoc</p> <p>13 meetings or were they standing meetings?</p> <p>14 A. I believe they were standing meetings.</p> <p>15 Q. You said you can't remember how often. Was it weekly,</p> <p>16 monthly, quarterly?</p> <p>17 A. I believe they were monthly.</p> <p>18 Q. Can you remember specifically attending any during the</p> <p>19 relevant period in 2017?</p> <p>20 A. No.</p> <p>21 Q. I want to --</p> <p>22 A. Sorry, do you mean -- can I refer to any times</p> <p>23 I referred or did I attend?</p> <p>24 Q. Did you attend any meetings during that relevant period?</p> <p>25 A. Oh, if there was meetings, yes, I would have attended.</p> <p style="text-align: center;">Page 9</p>	<p>1 as soft and weak."</p> <p>2 You have commented in your second witness statement</p> <p>3 that you saw things differently to Nathan Ward. Can you</p> <p>4 explain what you mean by that?</p> <p>5 A. Can I just ...</p> <p>6 Q. It is page 4, paragraph 14 of your second witness</p> <p>7 statement.</p> <p>8 A. Yes. Basically, Nathan Ward came from a young</p> <p>9 offenders' institute, so he wanted to make sure that the</p> <p>10 way we were looking after families and young offenders,</p> <p>11 or children, was done correctly, and I think, up until</p> <p>12 then, we didn't have the experienced people, qualified</p> <p>13 people, to look after them. So he was making</p> <p>14 arrangements for these people to go on various courses</p> <p>15 to gain the qualification needed to look after young</p> <p>16 children and their families, which is what I meant by</p> <p>17 "seeing things differently" because I hadn't come from</p> <p>18 that background, so I could only go off of what he was</p> <p>19 telling us.</p> <p>20 Q. So from what I understand, Nathan Ward, in his statement</p> <p>21 here, is suggesting that every DCM should be trained in</p> <p>22 crisis communications and negotiations at Brook House as</p> <p>23 well?</p> <p>24 A. Yes.</p> <p>25 Q. What did you think of that?</p> <p style="text-align: center;">Page 11</p>
<p>1 Q. You said "if there were meetings".</p> <p>2 A. Yes.</p> <p>3 Q. Could you be sure that there were meetings that were</p> <p>4 held between April and August 2017?</p> <p>5 A. I can't recall.</p> <p>6 Q. I want to ask you another question about use of force.</p> <p>7 If I could ask Zaynab, please, to pull up a document on</p> <p>8 screen, <DL0000141>, page 85. This is Nathan Ward's</p> <p>9 witness statement to the inquiry. Do you remember</p> <p>10 Nathan Ward?</p> <p>11 A. Yes.</p> <p>12 Q. Paragraph 239 in the middle there:</p> <p>13 "In Tinsley House, I did try and train every DCM in</p> <p>14 crisis communications and negotiation strategies and it</p> <p>15 did have an impact on the number of use of force</p> <p>16 incidents which were significantly lower than at</p> <p>17 Brook House. This approach was not embraced and it led</p> <p>18 to [me] being treated as an outsider by those such as</p> <p>19 Jules Williams and the majority of DCMs, particularly</p> <p>20 those working at Brook House. I felt as though I was</p> <p>21 not trusted by the staff or managers in Brook House who</p> <p>22 believed I prioritised detainee needs at the expense of</p> <p>23 staff, and there was a level of tension and conflict</p> <p>24 with the DCMs about this. It ran counter to the</p> <p>25 dominant 'us [and] them' mentality and I was sidelined</p> <p style="text-align: center;">Page 10</p>	<p>1 A. I didn't have a problem with it, because it helped</p> <p>2 assist with the DCMs learning more, getting more</p> <p>3 training behind them. He'd obviously had some previous</p> <p>4 training from this area and knew to value -- valuable</p> <p>5 with it, so obviously, that's why he wanted to implement</p> <p>6 it across both sites.</p> <p>7 Q. Do you know why he said that he was treated as an</p> <p>8 outsider by you?</p> <p>9 A. No. I don't understand why he said that. I didn't have</p> <p>10 a problem with Nathan Ward. We spoke as and when we</p> <p>11 needed to speak to each other, to the extent I even</p> <p>12 recall he wanted to move me down to Tinsley House to</p> <p>13 work alongside him, because I think he wanted to use my</p> <p>14 knowledge to help bring Tinsley forward because,</p> <p>15 obviously, it was the first time he'd been into an IRC,</p> <p>16 and he wanted to use me as well alongside him. So</p> <p>17 I don't understand why he said I treated him as an</p> <p>18 outsider.</p> <p>19 Q. Did you think that he prioritised detained persons'</p> <p>20 needs over staff needs?</p> <p>21 A. Only to the extent of their families, to increase -- to</p> <p>22 make things better, a better environment for the</p> <p>23 families and children. Outside that, no. I know that</p> <p>24 he wanted to bring in the soft touch for the families</p> <p>25 and the children. He thought that to have children</p> <p style="text-align: center;">Page 12</p>

3 (Pages 9 to 12)

<p>1 looking out of a window, seeing barbed wire, was not</p> <p>2 correct, so he wanted to soften the environment for them</p> <p>3 to make it easier and more comfortable for them.</p> <p>4 Q. What about at Brook House, where there wasn't any</p> <p>5 children?</p> <p>6 A. I don't think he prioritised there. I think Nathan felt</p> <p>7 that he was restricted in what he could do at</p> <p>8 Brook House -- because he was in charge of Tinsley and</p> <p>9 not Brook House -- so apart from training, I can't</p> <p>10 recall anything else he tried to do at Brook House at</p> <p>11 the expense of staff.</p> <p>12 Q. He says that he was sidelined as soft and weak. Did you</p> <p>13 see him as soft and weak?</p> <p>14 A. No. No. A lot of people seen Nathan Ward as different</p> <p>15 because of his personal life. He was looking to join</p> <p>16 the church and stuff like that. So people seen him</p> <p>17 different in that respect. But I found him to be</p> <p>18 a pretty good manager. When he done duty director, he</p> <p>19 was spot on. I even done a couple of investigations on</p> <p>20 his behalf for him. So I would have never classed him</p> <p>21 as soft and weak.</p> <p>22 Q. What do you mean by "his personal life"?</p> <p>23 A. Outside -- if I remember rightly, he didn't own a TV or</p> <p>24 anything like that at home. So his life was different</p> <p>25 to how most people see it when they have got a TV at</p> <p style="text-align: center;">Page 13</p>	<p>1 management. You've got E1s, which was my grade, and</p> <p>2 then you had D grades, which is next level up, which is</p> <p>3 heads of department. So that's why I asked him, when he</p> <p>4 asked for a meeting with senior management, did it</p> <p>5 include me, and he said, yes, if I'm a duty director,</p> <p>6 then, as far as he's concerned, yes, I'm part of that</p> <p>7 team.</p> <p>8 Q. So Lee Hanford describes in his second Verita interview</p> <p>9 that there was, and I quote, "a huge missing link" which</p> <p>10 resulted in you representing res on the SMT. He says</p> <p>11 that you were representing res since you were the most</p> <p>12 senior residential manager, but there wasn't, in fact,</p> <p>13 a head of res position in place at the time at</p> <p>14 Brook House, and you weren't paid, and I quote, anywhere</p> <p>15 near the grade of head of residence because you were an</p> <p>16 E1 grade, as you have just said, DCMs were E2, and there</p> <p>17 wasn't a D grade manager that was above that. Is that</p> <p>18 an accurate description?</p> <p>19 A. Yes. I actually took it that the deputy director was</p> <p>20 the head of residence, because he represented me if</p> <p>21 there was ever meetings with the Home Office and IMB and</p> <p>22 stuff like that.</p> <p>23 Q. Pause there. Who was that at the time?</p> <p>24 A. At that particular time, that would be Steve Skitt.</p> <p>25 Q. He was your line manager?</p> <p style="text-align: center;">Page 15</p>
<p>1 home and all that. Also, he was joining the church to</p> <p>2 become a church member, so, yeah, it was different from</p> <p>3 the environment we was in.</p> <p>4 Q. I want to ask you now about your role specifically as</p> <p>5 a residential regimes manager. You said in your first</p> <p>6 witness statement, paragraph 5, that you were part of</p> <p>7 the senior management team from the outset of taking up</p> <p>8 that position?</p> <p>9 A. Yes.</p> <p>10 Q. You describe Lee Hanford arriving. When you say</p> <p>11 Lee Hanford arrived in your witness statement, are you</p> <p>12 talking about 2016, before the relevant period?</p> <p>13 A. Yes, I believe so, yes.</p> <p>14 Q. So he asked for an SMT meeting. When you asked him if</p> <p>15 this included you, he asked if you performed the</p> <p>16 director duty -- the daily duty role, and when you</p> <p>17 replied yes, he said, "Then you're a part of the SMT"?</p> <p>18 A. Yes.</p> <p>19 Q. Why did you think it was necessary to ask Lee Hanford if</p> <p>20 you were part of the SMT?</p> <p>21 A. When Lee Hanford come in, I knew that his position from</p> <p>22 outside of the company was sufficiently higher in what</p> <p>23 he'd done; looking after projects and stuff like that.</p> <p>24 So when he come in and asked for a meeting with the</p> <p>25 senior management team, there is two groups of senior</p> <p style="text-align: center;">Page 14</p>	<p>1 A. Yes, at that particular -- in the relevant period.</p> <p>2 Q. So he was right then, wasn't he, that there was</p> <p>3 a missing link --</p> <p>4 A. Yes.</p> <p>5 Q. -- between you and the duty director?</p> <p>6 A. Yes -- well, not the duty director --</p> <p>7 Q. Sorry, not the duty director, the deputy director,</p> <p>8 Steve Skitt?</p> <p>9 A. Yes.</p> <p>10 Q. There should have been somebody in between the two of</p> <p>11 you?</p> <p>12 A. Yes.</p> <p>13 Q. Was that the case for the whole of the time you were at</p> <p>14 Brook House or just during the relevant period?</p> <p>15 A. Right up until I believe it was January 2018, when</p> <p>16 Mark Demian was appointed as head of residence.</p> <p>17 Q. In your second witness statement, as we have just</p> <p>18 discussed, you said that there should have been</p> <p>19 a manager between you and the deputy director, but you</p> <p>20 said, "At the time, I believe it was appropriate for me</p> <p>21 to be on the SMT". Would you have benefited from the</p> <p>22 support of having another manager between you and the</p> <p>23 deputy director?</p> <p>24 A. Yes, I believe so.</p> <p>25 Q. How would you have benefited, do you think?</p> <p style="text-align: center;">Page 16</p>

4 (Pages 13 to 16)

<p>1 A. Because I would have someone with more direct contact 2 with – the deputy director was not always available. 3 He obviously had other things he needed to deal with. 4 So where I had an in-between link, then I had someone 5 I could go to more directly and speak with and sort 6 things out, rather than hassling the duty director -- 7 deputy director -- sorry, deputy centre manager all the 8 time.</p> <p>9 Q. You say "with issues". Were there any particular issues 10 that it would have been helpful to have been able to 11 have spoken directly to a manager?</p> <p>12 A. I can't think of any particular issues. I know that 13 coming back down, it would have been sufficient because 14 information would have come back that way rather than 15 wanting to see the deputy centre director all the time 16 to find out information. I would have someone I could 17 have just gone and seen, and vice versa.</p> <p>18 Q. Lee Hanford also said in his interview to Verita that 19 you were not competent in a managerial role. He says 20 that at <VER000239> page 4, paragraph 19. He also said: 21 "... we were expecting [Julian Williams] to punch 22 above his weight in an area that I don't think he has 23 the confidence to do that, to be perfectly honest. 24 "... 25 "... we have the skill set at other grades within</p> <p style="text-align: center;">Page 17</p>	<p>1 the food and weather, it could have been more -- it 2 could have been more use than what it was. I think, 3 when the weather was bad, then the courtyards were 4 closed, so games were not played then, so that had an 5 impact of more detainees walking around the centre with 6 nothing to do.</p> <p>7 Q. Were activities something that you were responsible for?</p> <p>8 A. Yes.</p> <p>9 Q. Were there any other issues with activities, apart from 10 the vagaries of the weather?</p> <p>11 A. The computer room used to cause problems at time. We 12 had no control over the IT system externally. So that 13 could cause problems at times. So that would go down 14 and detainees would be unhappy about that, but we needed 15 to make arrangements through welfare for them to use the 16 computer if it was an urgent need. So that also could 17 be a problem at times.</p> <p>18 The cultural kitchen was also an issue at times, 19 when we didn't always have the staff to put someone in 20 there to look after it for the detainees to go and cook.</p> <p>21 Q. I'll come on to staffings later on in your evidence. 22 I'm also going to now put to you another statement, or, 23 rather, interview, by Verita, and this time this 24 interview was with Ian Castle. Did you know Ian Castle? 25 A. Yes.</p> <p style="text-align: center;">Page 19</p>
<p>1 the safeguarding, to support that area, but [areas that 2 are] still failing, particularly October, November, 3 December and moving into the early part of January, the 4 area that was failing was residence."</p> <p>5 Your answer to this is in your second witness 6 statement, where you say there were some areas, such as 7 cleanliness, which are audited by an external auditor. 8 Other than that, are there any other areas in which you 9 consider that he was right that there were areas in 10 which you were failing?</p> <p>11 A. Apart from cleanliness, I can't think of any. There may 12 have been issues which needed resolving on the wings, 13 like the cleanliness of the wings, the rooms, searching, 14 but I can't think of anything directly.</p> <p>15 Q. Ed Marsden, who was questioning Lee Hanford, in the 16 Verita interview, seemed to suggest that there may have 17 been an issue with lack of regular activities. Do you 18 think there was an issue with lack of regular 19 activities?</p> <p>20 A. That depended on the weather. I think, given the way 21 Brook House was laid out, we made best use of the rooms 22 what was available throughout the centre. We also tried 23 to put activities, sort of card games, and stuff like 24 that, on the wings for detainees to have as well. So 25 I think we made best use of what was available. I think</p> <p style="text-align: center;">Page 18</p>	<p>1 Q. He said of you, you appeared to -- sorry: 2 "In order to be a good manager, it is handy to have 3 a bit of charisma, a bit of personality. That is not 4 something that he is endowed with at all. I would also 5 expect a manager to be able to communicate with his 6 staff, to communicate with detainees, but I am pretty 7 certain that he doesn't have the respect of the staff 8 nor of the majority of the rest of SMT."</p> <p>9 That's at <VER000268> page 7. Did you feel that you 10 were able to communicate with those you managed, the 11 staff?</p> <p>12 A. Yes.</p> <p>13 Q. What about detainees?</p> <p>14 A. Yes, I didn't have a problem communicating with 15 detainees.</p> <p>16 Q. Did you feel that those you managed and the rest of 17 the SMT respected you?</p> <p>18 A. I can't answer for how the SMT felt about me. I worked 19 with them. We attended meetings. So I can't answer how 20 they felt about me.</p> <p>21 Q. I'm going to take you now to something Michelle Brown 22 said in relation to Steve Skitt's management of you. If 23 we can please turn to <VER000221>, page 117 [sic]. It's 24 paragraph 250. So this is a second interview 25 in February 2018 with Michelle Brown by Verita. It is</p> <p style="text-align: center;">Page 20</p>

5 (Pages 17 to 20)

<p>1 250. I will start with the second sentence:</p> <p>2 "If you go through SMT minutes, there is stuff that</p> <p>3 we talked about -- changing, informing the committee</p> <p>4 about [employment] of the month. That never happened.</p> <p>5 Things in meetings, just are talked about, if that makes</p> <p>6 sense. The 28th is a perfect example: we raised it. We</p> <p>7 raised it the month before and Jules didn't bother</p> <p>8 coming to the security meeting and so I complained.</p> <p>9 When Jules did come to the security meeting, Jules came</p> <p>10 in and fell asleep. It's on there -- it is an ongoing</p> <p>11 action. I don't think Jules likes challenges from</p> <p>12 females. There was a member of staff before --</p> <p>13 Stacie Dean -- who was security senior manager, and he</p> <p>14 would [just] kind of grunt at her. He grunts at me.</p> <p>15 I don't know what conversations Steve has with Jules,</p> <p>16 because Steve says to me 'I'm managing him' and I am</p> <p>17 thinking 'performance managing him or managing him?'</p> <p>18 There is a difference. I genuinely don't know whether</p> <p>19 we are into that process at all but I suspect that we</p> <p>20 are not and it is just a conversation in the morning to</p> <p>21 say 'You need to look at that.'</p> <p>22 Did you regularly attend security meetings?</p> <p>23 A. Not as regularly as I should have done.</p> <p>24 Q. Were you required to go to every security meeting?</p> <p>25 A. I was. However, I was also under the impression that if</p> <p style="text-align: center;">Page 21</p>	<p>1 A. I believe so, yes.</p> <p>2 Q. What do you say about the allegation that you don't like</p> <p>3 being challenged by females?</p> <p>4 A. I didn't have a problem with that. I did not have</p> <p>5 a problem with that at all.</p> <p>6 Q. And what about grunting at Stacie Dean and</p> <p>7 Michelle Brown? Did you do that?</p> <p>8 A. I don't believe so.</p> <p>9 Q. You don't believe so or you didn't?</p> <p>10 A. I don't believe I grunted at either of them.</p> <p>11 Q. In terms of performance management, Michelle Brown is</p> <p>12 suggesting there that Steve ought to have been</p> <p>13 performance managing you. Were you, in fact, ever on</p> <p>14 a performance management programme?</p> <p>15 A. No.</p> <p>16 Q. Was it ever discussed with you by Steve Skitt or any</p> <p>17 other manager?</p> <p>18 A. No.</p> <p>19 Q. In your second witness statement, paragraph 13, you</p> <p>20 describe Steve Skitt as an honest and effective line</p> <p>21 manager, and that if there was a problem, he would tell</p> <p>22 you and his expectations of you. Can you remember</p> <p>23 Steve Skitt raising any particular issues in 2017?</p> <p>24 A. Again, one of them would be cleanliness of the centre,</p> <p>25 following the Home Office doing an inspection or an</p> <p style="text-align: center;">Page 23</p>
<p>1 I couldn't attend, then I could send one of the DCMs</p> <p>2 from the wings to represent me, which is what I done at</p> <p>3 times.</p> <p>4 Q. When you say "under the impression", does that mean --</p> <p>5 were you under the right impression, was that the right</p> <p>6 thing to do?</p> <p>7 A. I was -- as far as I was concerned, as long as there's</p> <p>8 a representation from the residential area, that was</p> <p>9 sufficient.</p> <p>10 Q. And was that, in fact, sufficient?</p> <p>11 A. No, because they wanted me to attend instead.</p> <p>12 Q. Once you were told that you should attend the security</p> <p>13 meetings, did you attend?</p> <p>14 A. Yes.</p> <p>15 Q. Did you fall asleep?</p> <p>16 A. I believe, on one occasion, I dozed. I didn't fall</p> <p>17 asleep. I dozed for a couple of seconds or something</p> <p>18 like that. I was not the only one who ever done it, but</p> <p>19 I never seen anyone else get pulled up for it.</p> <p>20 Q. You said you were pulled up for it?</p> <p>21 A. Yes.</p> <p>22 Q. Who by?</p> <p>23 A. Steve Skitt pulled me up for it.</p> <p>24 Q. Was that the only occasion that you fell asleep at</p> <p>25 a security meeting?</p> <p style="text-align: center;">Page 22</p>	<p>1 external auditor coming in doing an inspection. Steve</p> <p>2 would tell me then. Other things would be to see DCMs</p> <p>3 on the wing on a more regular basis during meal times,</p> <p>4 he'd pull me up for that, if someone wasn't there at</p> <p>5 meal times. Other areas would be, like, completing</p> <p>6 investigations on time.</p> <p>7 Q. So those two things that you've mentioned, those --</p> <p>8 sorry, those three issues, cleanliness, pulling up DCMs</p> <p>9 attending meetings and --</p> <p>10 A. Not attending meetings, attending the wings.</p> <p>11 Q. Attending the wings. I see, so being present on the</p> <p>12 wings?</p> <p>13 A. Yes.</p> <p>14 Q. And submitting investigations on time?</p> <p>15 A. Yes.</p> <p>16 Q. Were those regular issues that Steve Skitt would talk to</p> <p>17 you about?</p> <p>18 A. No, no. No.</p> <p>19 Q. How often would he raise those types of issues with you?</p> <p>20 A. The cleanliness would be -- it could be a positive</p> <p>21 anyway or a negative from after the Home Office doing</p> <p>22 their walk-arounds, and that would come from the weekly</p> <p>23 meeting or we would receive an email on a daily basis</p> <p>24 from the Home Office saying, "We have been on this wing</p> <p>25 and this was dirty or that was dirty", so I would also</p> <p style="text-align: center;">Page 24</p>

6 (Pages 21 to 24)

<p>1 get copies of the emails as well. Investigations would 2 be -- if I had an investigation -- I may not have had an 3 investigation for a couple of months, but timescale 4 might have fallen behind, so they would pull me up for 5 it. DCMs on the wings, again, that wouldn't be all the 6 time. That would be, like, at meal times if someone 7 wasn't there, so, again, he would only pull me up if he 8 was aware of the situation.</p> <p>9 Q. You've mentioned cleanliness quite a few times?</p> <p>10 A. Yeah.</p> <p>11 Q. Was that a particular issue at Brook House?</p> <p>12 A. Yes, yes.</p> <p>13 Q. In a particular wing or a particular place or ...?</p> <p>14 A. One of the main areas where we used to get pulled up 15 a lot was the showers, and, as I used to try to explain 16 to management, I wouldn't scrub one of those showers for 17 a pound an hour, so it's difficult to get detainees to 18 scrub body fat off the back of the showers for a pound 19 an hour, and so we'd quite often get pulled up for it.</p> <p>20 The other areas would be the floor would be dirty, 21 if it needed polishing or cleaning, or bins needed 22 emptying, and stuff like that, or graffiti on the walls.</p> <p>23 Q. Where detainees didn't clean, such as in the showers, 24 wasn't there a cleaning contract for paid staff to come 25 and clean it?</p> <p style="text-align: center;">Page 25</p>	<p>1 Brook House, I attended various courses to learn. Once 2 I become a senior manager, I didn't find many courses 3 available which -- to assist me to go forward. So the 4 desire to -- and the desire to develop myself, I believe 5 that may be referring to the Corn dell course, which we 6 were put on, which I was struggling with. As to others 7 around me on their EDRs, I used to give targets, I used 8 to ask them to go and look at various courses, which 9 they liked to do, so in order to help them develop.</p> <p>10 Q. You have mentioned Corn dell. That was something that 11 was brought in by Lee Hanford after the relevant period, 12 wasn't it?</p> <p>13 A. Yes.</p> <p>14 Q. You said that you struggled with Corn dell?</p> <p>15 A. Yes.</p> <p>16 Q. That was a kind of training scheme, wasn't it, for 17 managers?</p> <p>18 A. It was a level 5 management training scheme.</p> <p>19 Q. Why did you say you struggled with it? In what way?</p> <p>20 A. Finding the time to do it. I didn't struggle with 21 actually doing it. But it was finding the time to do it 22 and Lee Hanford's answer was that I should do it at home 23 if I couldn't find the time at work to do it.</p> <p>24 Q. We will come on to training for DCMs as well, in 25 a moment, and some of the problems there. I just want</p> <p style="text-align: center;">Page 27</p>
<p>1 A. For Aramark, no. From what I can gather over the years, 2 there's been a bit of to and froing of who was actually 3 to do it. Certainly in the earlier years, I used to 4 work alongside of Aramark and they used to clean the 5 showers, give them a scrubdown once a month, but then it 6 came about that they were not responsible for it, and so 7 it then fell down to me to get paid workers to get to do 8 it.</p> <p>9 Q. I want to now take you to Michelle Brown's witness 10 statement, <INQ000164>, page 3. It is paragraph 4. 11 This is Michelle Brown's witness statement speaking 12 about you. I will summarise it here. Essentially, she 13 says that she experienced some frustrations working with 14 you. She said that you lacked coaching skills and 15 a desire to develop yourself or others around you. 16 There was a perception that there was a lack of faith in 17 your ability to complete and deliver to the required 18 standard, that you did not have the skill set to deal 19 with computer work, and high-level stakeholder 20 engagement was needed. Do you agree that you lacked 21 coaching skills and a desire to develop others around 22 you?</p> <p>23 A. I don't know what she means by "coaching skills" or 24 "desire to develop". In the early days, I had attended 25 various courses. Certainly, before I joined</p> <p style="text-align: center;">Page 26</p>	<p>1 to ask you a few more questions about what 2 Michelle Brown has said. How were your computer skills?</p> <p>3 A. I could use a computer. I could carry out 4 investigations using investigation skills. My wording 5 may have been a bit bad. I was tested for dyslexia, and 6 so my wording, or the way I sentenced stuff together, 7 was -- might have been a bit bad, and I did have 8 a computer programme to put on my computer to help me 9 with that -- (inaudible) that line, to increase it. But 10 basic computer skills, yes, I could write reports up, 11 I could use it, I could ...</p> <p>12 Q. Do you accept any of the criticisms that she makes 13 there?</p> <p>14 A. No, I don't accept any of that. The only thing I would 15 say was that was delivering or completing 16 investigations, (inaudible) some time. I did struggle 17 with that at times, completing investigations on time, 18 and would have to ask for extensions.</p> <p>19 Q. Why would you have to ask for extensions?</p> <p>20 A. Some of it could be that staff weren't available at the 21 time, so I had to wait for them to come back on shift. 22 Other times, could be that I had other work going on at 23 the same time or there was a duty director, so there 24 could be times that the investigations wasn't completed 25 on time and I would be chased up for it.</p> <p style="text-align: center;">Page 28</p>

7 (Pages 25 to 28)

<p>1 Q. I want to now ask you about your visibility on wings, 2 and also cliques. You have said in your first witness 3 statement that you used to get around the wings on 4 a regular basis -- that's paragraph 23 -- "and in 5 general I did not see any issues with staff attitudes 6 towards detainees, including during the relevant 7 period". Mr Williams, we have heard evidence that, 8 compared to Steve Skitt and Michelle Brown, you were 9 much more present on the wings. So DCO Ed Fiddy said 10 that. Did you watch Panorama?</p> <p>11 A. Yes.</p> <p>12 Q. Did you watch it live or did you watch it afterwards?</p> <p>13 A. I watched it live.</p> <p>14 Q. Were you surprised at what you saw or not?</p> <p>15 A. I was disgusted with what I saw, and surprised. Because 16 I didn't think that was going on. But I was actually 17 disgusted with what I saw.</p> <p>18 Q. Is it right, as Ed Fiddy said, that you were around the 19 wings a lot?</p> <p>20 A. Yes.</p> <p>21 Q. We have heard evidence from numerous detention centre 22 officers during this inquiry, including Steve Webb, who 23 called D728 a "fucking twat", threatened to "punch the 24 cunt" in E wing. Mr Fiddy himself called a detainee "an 25 absolute poofier", and so on. There was a lot of</p> <p style="text-align: center;">Page 29</p>	<p>1 of reasons.</p> <p>2 Q. Did you ever hear a DCO use bad language towards 3 a detainee?</p> <p>4 A. No, not in my presence. Not while I was on the wings.</p> <p>5 Q. How often did you have to speak to a DCO for having an 6 argument with a detainee?</p> <p>7 A. I wouldn't say it was that often. Maybe once a month 8 I'd call someone up, just because they're having an 9 argument with a detainee and voices were raised.</p> <p>10 Q. Was this during the relevant period as well, in 2017?</p> <p>11 A. Yes.</p> <p>12 Q. You said in your witness statement, your first witness 13 statement, paragraph 7, that the culture at Brook House 14 had improved from when you first started in 2009. In 15 what way had it improved?</p> <p>16 A. The staff had become more experienced. When I first 17 started there in September 2009, staff were very 18 inexperienced. They'd never worked in a detention 19 centre before. So they were learning their way as they 20 were going along. And so detainees became more settled 21 down in the centre. A lot of detainees come from 22 prisons and areas like that when first -- Brook House 23 first opened up, so they knew staff were inexperienced 24 so they took advantage of it and, after the years passed 25 on, the staff become more experienced, more settled</p> <p style="text-align: center;">Page 31</p>
<p>1 swearing and verbal abuse of detainees that was seen on 2 Panorama we have heard during this inquiry. If you were 3 on the wings a lot, how did you not hear this kind of 4 verbal abuse that took place?</p> <p>5 A. When I was on the wings, staff would be aware of it. So 6 there wouldn't be -- they'd know that if they were 7 behaving that way towards a detainee, I would pull that 8 member of staff up straight away. I would take them to 9 the office, call them up to my office. Because staff -- 10 once a senior manager walks on the wing, then staff 11 behave normal.</p> <p>12 Q. You said that you would call them up into the office. 13 How often did that happen?</p> <p>14 A. Not very often. Some of the times I've been -- I've 15 come down to a wing and a member of staff would be 16 having an argument with a detainee, and so I'd wait for 17 that to finish and then I'd speak to that member of 18 staff privately or call them up to my office and ask 19 them what all that was about. I'd go to see the 20 detainees to see if there was an issue.</p> <p>21 Q. When you say an "argument", what do you mean? What kind 22 of thing were a detainee and a DCO arguing about?</p> <p>23 A. It could be anything from the detainee demanding to see 24 the Home Office, wanting to know why he hasn't gone 25 home, why he hasn't been released; it could be a number</p> <p style="text-align: center;">Page 30</p>	<p>1 down. Detainees became more settled down. So the place 2 became a better-running place/environment.</p> <p>3 Q. What did you mean by "culture"? What culture had there 4 been at the beginning when you came in 2009, compared to 5 the end?</p> <p>6 A. There was -- when I first started there, there was 7 a very -- hatred/dislike for Home Office.</p> <p>8 Q. Pause there. From who?</p> <p>9 A. The detainees. That caused a lot of problems which the 10 staff had to deal with, because they were the front-line 11 between them and the Home Office, so the staff had to 12 deal with that, and a lot of issues arose from detainees 13 in that respect, because they'd want to speak to them, 14 they'd want to see them all the time, like, so there was 15 issues there.</p> <p>16 The actual running of the place, once detainees had 17 been in there for a little while, they seemed to settle 18 down in the environment, they found friends, they found 19 friends of different nationalities, friends from 20 outside, so in that respect, the culture changed and 21 settled more.</p> <p>22 Q. But the same detainees weren't there from 2009 until 23 2018, were they?</p> <p>24 A. No, no. No.</p> <p>25 Q. So why would detainees' attitudes towards the</p> <p style="text-align: center;">Page 32</p>

8 (Pages 29 to 32)

<p>1 Home Office have changed in that period?</p> <p>2 A. I think it was because the Home Office had moved forward</p> <p>3 in regards to giving back – feeding back information to</p> <p>4 detainees. One of the areas that I can think of was</p> <p>5 that – I can't remember when it came out, but they</p> <p>6 would give detainees 24 hours' notice of their impending</p> <p>7 removal. This allowed detainees to arrange visits, to</p> <p>8 arrange onward transport when they got home, to make</p> <p>9 phone calls, and so they were happy about this because,</p> <p>10 prior to then, they weren't getting notification of</p> <p>11 removals.</p> <p>12 Q. What about staff culture? You have spoken about the way</p> <p>13 detainees felt about the Home Office. What about staff</p> <p>14 culture? Had that changed during your time at</p> <p>15 Brook House?</p> <p>16 A. Yes, because staff started understanding that their role</p> <p>17 in what they were doing and how to look after detainees</p> <p>18 and the detainee needs. During that relevant period,</p> <p>19 the staff culture or the morale went downhill big style</p> <p>20 because a lot of staff were disgusted with they saw on</p> <p>21 the Panorama programme, and then had to deal with the</p> <p>22 aftermath of it with detainees.</p> <p>23 Q. So the culture that we saw in Panorama of staff, that</p> <p>24 was better than what you saw in 2009? The way that</p> <p>25 staff -- that we saw in --</p> <p style="text-align: center;">Page 33</p>	<p>1 co-operate with you. My experience was most staff were</p> <p>2 too scared to raise concerns."</p> <p>3 That's <INQ000106> page 29. Do you have any comment</p> <p>4 to make in relation to that?</p> <p>5 A. I know staff didn't trust the DCMs. They didn't trust</p> <p>6 them because – exactly like you said, they wouldn't</p> <p>7 take any further action on anything.</p> <p>8 Q. Was there any particular DCMs you're thinking of?</p> <p>9 A. No, I can't think of any particular ones at this time.</p> <p>10 But I know staff didn't trust them at times.</p> <p>11 Q. Which staff didn't trust who?</p> <p>12 A. Various staff on the wings. They believed that – with</p> <p>13 some of the DCMs, there was no point talking to them</p> <p>14 because nothing would get done or they wouldn't act upon</p> <p>15 it or they wasn't visible on the wings to deal with the</p> <p>16 issues.</p> <p>17 Q. Are you thinking of anyone in particular?</p> <p>18 A. No, I'm just -- I'm just summarising how staff felt at</p> <p>19 times.</p> <p>20 Q. What about you? He is not just saying that DCMs can't</p> <p>21 be trusted, he's saying that he'd have no confidence</p> <p>22 that members of the SMT would take anything forward.</p> <p>23 A. If it was brought to me, I would have dealt with it;</p> <p>24 it's simple as that.</p> <p>25 Q. Were you close to abusive members of staff like</p> <p style="text-align: center;">Page 35</p>
<p>1 A. No.</p> <p>2 Q. -- were acting towards detainees?</p> <p>3 A. No, that's just during disgusting the way they were</p> <p>4 behaving. That's not what I saw back in the early days.</p> <p>5 Q. You said in your first witness statement, paragraph 36:</p> <p>6 "I would like to think that I had an open-door</p> <p>7 approach with staff. I would often walk around the</p> <p>8 wings speaking to detainees and staff."</p> <p>9 We heard from Callum Tulley, in his live evidence,</p> <p>10 this. He said:</p> <p>11 "The most egregious act of cruelty and mistreatment</p> <p>12 of a detainee that I can remember was performed by two</p> <p>13 DCMs, so I think when you're a DCO, if you have people</p> <p>14 above you that are treating people so abhorrently, then</p> <p>15 you're not going to have any confidence in raising</p> <p>16 complaints. The SMT were barely visible. Members of</p> <p>17 the SMT, like Jules Williams, were close to abusive</p> <p>18 members of staff, like Graham Panel, so people like</p> <p>19 myself had no confidence that going to the SMT would be</p> <p>20 anything other than fruitless and whose word was it</p> <p>21 going to be? The word of a DCO against the word of</p> <p>22 a DCM? Much of the abuse would happen inside cells in</p> <p>23 which there were no cameras, so how you would</p> <p>24 substantiate any of your complaints would be very</p> <p>25 difficult unless you had other officers who would</p> <p style="text-align: center;">Page 34</p>	<p>1 Graham Purnell?</p> <p>2 A. I knew Graham Purnell, yes. I did socialise externally</p> <p>3 with Graham Purnell.</p> <p>4 Q. We will come now to Nathan's evidence in relation to</p> <p>5 socialising and the existence of the clique. If we can</p> <p>6 please turn to <DL0000141> pages 59 to 60,</p> <p>7 paragraph 166. This is Nathan Ward's first witness</p> <p>8 statement to the inquiry. It is paragraph 166. Over</p> <p>9 the page, please. I'm afraid that doesn't seem to be</p> <p>10 the right paragraph. I'll read it out, if that's all</p> <p>11 right:</p> <p>12 "While I was at Gatwick IRCs, I had a particular</p> <p>13 issue with residential manager Jules Williams, who was</p> <p>14 in charge of all the residential staff and therefore</p> <p>15 responsible for setting the tone and attitude of staff</p> <p>16 and detainee relationships. Jules didn't embody the</p> <p>17 values of respect and dignity. He would simply get the</p> <p>18 job done and was dedicated to making things happen,</p> <p>19 regardless of the human cost."</p> <p>20 Thank you, it is 168. Why do you think that</p> <p>21 Nathan Ward would think that about you?</p> <p>22 A. I don't know. It's correct that I was dedicated to</p> <p>23 making things happen and get the jobs done. I wouldn't</p> <p>24 have said "regardless of human cost", there's no way –</p> <p>25 I don't know why he would have said that. And I did</p> <p style="text-align: center;">Page 36</p>

9 (Pages 33 to 36)

<p>1 respect the detainees. I used to show them a lot of 2 respect and dignity. So I don't know why Nathan Ward 3 would say these things. I have no idea. 4 Q. I'm going to continue. I think it is over the page: 5 "He was surrounded by a number of staff ... which 6 I felt he was inappropriately close, such as 7 Graham Purnell, Alan James, Anthony Morgan, David Aldis, 8 Joe Marshall, Luke Hutchinson, Nathan Ring, Simon Brobyn 9 and Stephen Marnier. This group were protected and 10 favoured by Jules Williams and this dynamic is 11 representative of the hierarchies that operated in 12 Brook House amongst the staff which fostered a sense of 13 collusion and impunity. If you were in Jules Williams' 14 inner circle, you knew that you would be protected." 15 Were you friends with the people mentioned there? 16 A. Can you just go back one? 17 Q. Just scroll back a page, sorry, thank you. The bottom 18 of the page: Graham Purnell, Alan James, Anthony Morgan, 19 David Aldis, Joe Marshall, and so on? 20 A. I disagree with that. 21 Q. Just firstly, the question that I asked was, were you 22 friends with those people that are listed there? 23 A. The majority of them, yes. Not all of them. 24 Q. He describes them as your "inner circle". Were you 25 close friends with those people?</p> <p style="text-align: center;">Page 37</p>	<p>1 "Man up". He'd spoken to HR about it and he said it was 2 borderline bullying. Did you bully Ed Fiddy? 3 A. No. 4 Q. Do you remember the incident that he's talking about, 5 about pulling him up in front of staff about unlocking 6 a door incorrectly? 7 A. No. 8 Q. Did HR speak to you about the fact that Mr Fiddy had 9 complained about you bullying him? 10 A. No. I know during one annual report where he had an EDR 11 appraisal, Ed Fiddy was not happy about the comments 12 I put on it, and we spoke about it. And we -- if I'm 13 right in saying, I readjusted the comments, which he was 14 then happy about, but that's as far as ... 15 Q. What were the comments? 16 A. I can't remember now. I think it had something to do 17 with his work. But I can't remember what they actually 18 were. It was a few years -- I think it was about six, 19 seven years ago, so I can't remember. 20 Q. You said that you agreed to change what you'd said in 21 this review; is that right? 22 A. Yes. 23 Q. Can you remember at all what it was that you changed it 24 to, the issue? 25 A. I think I changed the wording. I didn't actually change</p> <p style="text-align: center;">Page 39</p>
<p>1 A. With some of them, yes. 2 Q. Did you socialise with them outside of work? 3 A. With some of them, yes. 4 Q. Do you know what he means by you would be protected if 5 you were part of this inner circle? 6 A. No, I don't, because there's names on there where I'd 7 done investigations and CID reports and some of them 8 I had issued disciplinaries to, so I wouldn't have 9 protected them. 10 Q. Who are those people? 11 A. Joe Marshall would have been one. Graham Purnell is 12 another one. Simon Brobyn. 13 Q. What about Nathan Ring? 14 A. I didn't have much to do with Nathan Ring. I had very 15 little. I went out a few times with Nathan Ring in my 16 period of time there, but I wasn't that close with him. 17 Q. We can take that down, thank you. 18 Mr Ed Fiddy, DCO Ed Fiddy, also gave evidence to 19 this inquiry, and in his witness statement -- no need to 20 bring it up -- <INQ000163> at pages 39 to 40, he says 21 that he was bullied and treated unfairly by you; that 22 you undermined him in front of staff; and he gave an 23 example of where he had unlocked a door wrongly and you 24 had showed him up in front of other staff. He described 25 you as a powerful figure and that you would say to him,</p> <p style="text-align: center;">Page 38</p>	<p>1 what it was I said in regards to the importance of it. 2 I just worded it differently. 3 Q. Did you ever say to him, "Man up"? 4 A. I can't recall. 5 Q. Have you ever said to any other DCO or DCM, for that 6 matter, "Man up"? 7 A. Not as far as I know. 8 Q. Is that -- 9 A. Not as far as I know. 10 Q. I assume you would know because you were the person 11 saying it. 12 A. Yes, yes. 13 Q. So did you say those words? 14 A. I can't recall ever saying it. 15 Q. Did you hear others say, "Man up"? 16 A. I have heard it once or twice, yes. 17 Q. Who have you heard it said to and from -- by, rather? 18 A. I can't honestly recall who said it or who said it to 19 who. 20 Q. Was it a DCM saying it to a DCO? Is that more likely 21 than a DCO to a DCO? 22 A. It could be both, DCM to DCO or DCO to DCO. 23 Q. What about a DCO or DCM to a detainee? 24 A. No. I don't -- I've never heard that said to 25 a detainee.</p> <p style="text-align: center;">Page 40</p>

10 (Pages 37 to 40)

<p>1 Q. We have heard from several witnesses that that phrase, 2 "Man up", was used regularly around the centre. Did you 3 see evidence of this as a macho culture?</p> <p>4 A. If I'd have heard of it, then I would have dealt with 5 it, because it's not appropriate. So whether I see it 6 as a culture, it's not for me to say, because I haven't 7 actually heard it myself, so ...</p> <p>8 Q. Do you think there was a macho culture at Brook House?</p> <p>9 A. I believe there was some people who thought they were 10 above what they were doing. Having watched that 11 Panorama programme, yes.</p> <p>12 Q. What about, in your day to day -- forget Panorama for 13 a moment. But from what you saw, being on the wings for 14 nine years, did you see evidence of a macho culture?</p> <p>15 A. No, not directly, no.</p> <p>16 Q. So you're just saying that you saw evidence of that on 17 the Panorama programme, but not in reality; is that what 18 you're saying?</p> <p>19 A. Yes.</p> <p>20 Q. Sorry, rather, in your experience?</p> <p>21 A. Yeah, in my experience, no.</p> <p>22 Q. If we can go to what Ben Saunders has said about you, 23 it's <KEN000001>, page 31. It is paragraph 166. Right 24 at the top of the page, the bullet point at the top: 25 "Jules Williams -- as residential manager at</p> <p style="text-align: center;">Page 41</p>	<p>1 a case of not being able to bring their concerns to me, 2 it would be a case that, if they was doing something 3 wrong at that particular time, like not checking ID 4 cards on doors, I'd pull them up for it, I'd ask them 5 why they didn't do it. That's what I mean by being 6 critical. There has been times I've given praise as 7 well. I can say I have given praise. Not often, but 8 I have done it.</p> <p>9 Q. Did those that you were managing bring forward concerns 10 to you?</p> <p>11 A. If they had issues on the wings, they would speak to me, 12 yes.</p> <p>13 Q. What kind of issues?</p> <p>14 A. It could be anything from a detainee complaining on the 15 wing, wanting information, refusing to leave the wing, 16 got on the wrong wing and wouldn't get off again. It 17 could be anything from a day-to-day running of 18 the centre.</p> <p>19 Q. I want to ask you about your management now of DCMs. 20 You can take that down, thank you.</p> <p>21 In their interviews with Verita, both Ryan Harkness 22 and Stuart Povey-Meier comment on the difficulty 23 completing DCM training, and we referred earlier to your 24 difficulties in completing the Cornwell training.</p> <p>25 A. Yes.</p> <p style="text-align: center;">Page 43</p>
<p>1 Brook House, he had quite a large area of responsibility 2 managing all issues of a residential nature. There were 3 some things he did well. He could also become quite 4 defensive and abrupt and there was tendency for him to 5 be more critical rather than giving praise."</p> <p>6 Do you agree with that statement?</p> <p>7 A. I could, yes, become defensive and abrupt, especially in 8 meetings, because I'd be defending staff on the wings at 9 meetings, so I'd always want to put -- have my say and 10 put my point across, so I could become defensive and 11 abrupt.</p> <p>12 As for being critical, yes, I pulled staff up. 13 I quite often would pull staff up, rather than giving 14 them praise, yes. If staff did something wrong, I'd 15 pull them up.</p> <p>16 Q. If you were overly defensive, isn't that a problem when 17 learning lessons?</p> <p>18 A. I weren't overly defensive. I just -- what it was, I'd 19 be defensive if someone was putting them down. So 20 I would be defensive in supporting them.</p> <p>21 Q. And if you were overly critical, would that also deter 22 people from bringing forward genuine concerns?</p> <p>23 A. I believe I'd be critical in the way they're doing their 24 job at that particular time if they had done something 25 wrong, so I'd be critical in that. So it wouldn't be</p> <p style="text-align: center;">Page 42</p>	<p>1 Q. Harkness, in his Verita interview -- I won't bring it up 2 for reasons of team <VER000238> page 5 -- stated that he 3 never had any training as a DCM and that you were 4 responsible for his training as his line manager. He 5 said that he didn't have -- couldn't do this training 6 because he couldn't find time during the day to do the 7 micro study. Povey-Meier stated in his Verita interview 8 <VER000280> page 9 that it was not easy to get the 9 training due to poor staffing levels and turnover.</p> <p>10 We also heard from other DCMs who gave live evidence 11 to the inquiry, for example, Luke Instone-Brewer and 12 Stephen Webb, that they received no training to become 13 a DCM. Is there supposed to be some training --</p> <p>14 A. Yes.</p> <p>15 Q. -- when somebody is promoted to a DCM?</p> <p>16 A. Yes.</p> <p>17 Q. What should that consist of?</p> <p>18 A. It should consist of attending various training courses 19 and training sessions with different departments around 20 the centre to learn how things are done, like HR for 21 sickness and grievances, in dealing with grievances, 22 with the complaints department so they knew how to fill 23 out a complaint or a grievance, security so they knew 24 what they were doing in that area. So, yes, and I also 25 believe that there was a book developed by another</p> <p style="text-align: center;">Page 44</p>

11 (Pages 41 to 44)

<p>1 manager to give them that training so they could then</p> <p>2 follow a certain path of knowing what they had to learn</p> <p>3 in order to become a DCM.</p> <p>4 Q. So a type of booklet which set out what they needed to</p> <p>5 be trained in?</p> <p>6 A. Yes.</p> <p>7 Q. Or, rather, the training itself?</p> <p>8 A. Yes.</p> <p>9 Q. Were you aware that there were difficulties of DCMs</p> <p>10 completing this training?</p> <p>11 A. Yes.</p> <p>12 Q. When asked whether Ryan Harkness had ever had an</p> <p>13 opportunity to discuss with you the difficulties about</p> <p>14 training, he said in his Verita interview <VER000238></p> <p>15 page 5:</p> <p>16 "Jules is a difficult person to get your point</p> <p>17 across with. He is not very understanding."</p> <p>18 What do you make to that?</p> <p>19 A. I believe Ryan Harkness is referring to the Corndell</p> <p>20 training, because, along with myself, a lot of us was</p> <p>21 actually struggling to complete it.</p> <p>22 Q. But he says when he tried to raise this with you, he</p> <p>23 said "Jules is a difficult person to get your point</p> <p>24 across with. He's not very understanding". What do you</p> <p>25 say to that?</p> <p style="text-align: center;">Page 45</p>	<p>1 that he did not have an objective setting session with</p> <p>2 you as his line manager and he never had targets</p> <p>3 objectives, nothing, never had an EDR. Firstly, what's</p> <p>4 an EDR?</p> <p>5 A. It's the annual appraisal system.</p> <p>6 Q. Is it correct that he never had an EDR with you?</p> <p>7 A. He would have had at least one with me.</p> <p>8 Q. So you've said in your second witness statement that you</p> <p>9 would have had one yearly. He says he would have</p> <p>10 expected one a week after he went live as a DCO,</p> <p>11 in April of that year. Would you have normally had an</p> <p>12 EDR when somebody first becomes a DCO?</p> <p>13 A. No.</p> <p>14 Q. In terms of EDRs, did you do them regularly with the</p> <p>15 DCMs that you line managed?</p> <p>16 A. They were annually, and also we used to do a six-monthly</p> <p>17 review, just to see where they were with any training</p> <p>18 courses they'd asked to attend or objectives, to see</p> <p>19 where they were with it and to see whether we needed to</p> <p>20 review those particular objectives or training courses.</p> <p>21 Q. I want to bring on to -- that was what Ryan Harkness has</p> <p>22 said about your management of him. I want to turn now</p> <p>23 to what Ramon Giraldo Arbalaez has said. Michelle Brown</p> <p>24 in her witness statement -- I won't bring it up, but it</p> <p>25 is <INQ00164> page 3, paragraph 4, says that DCM Giraldo</p> <p style="text-align: center;">Page 47</p>
<p>1 A. I believe -- because I understood where he was coming</p> <p>2 from, so there's no offer of help I could give him</p> <p>3 because I was in the same situation.</p> <p>4 Q. What action did you take, if any, about this fact?</p> <p>5 A. At the time, none, I don't think.</p> <p>6 Q. Why not?</p> <p>7 A. Because, as I've said, I was in the same situation,</p> <p>8 struggling to complete the training myself.</p> <p>9 Q. Why didn't you raise the fact that you were struggling</p> <p>10 to complete this training with someone more senior to</p> <p>11 you?</p> <p>12 A. I had.</p> <p>13 Q. For example, Steve Skitt?</p> <p>14 A. I had.</p> <p>15 Q. What was his response?</p> <p>16 A. Their response was that they were going to offer me</p> <p>17 support, or I could go and see two particular managers,</p> <p>18 who would help me with computer training. The problem</p> <p>19 was, it wasn't actually doing the job, it was finding</p> <p>20 the time. So I never went to them to speak to them.</p> <p>21 Q. So did you, in fact, finish the Corndell --</p> <p>22 A. No.</p> <p>23 Q. -- apprenticeship programme?</p> <p>24 A. No.</p> <p>25 Q. Ryan Harkness also said in the same interview, page 6,</p> <p style="text-align: center;">Page 46</p>	<p>1 was frustrated with you, upset by lack of support he</p> <p>2 received and how he was spoken to at times. Looking at</p> <p>3 his Verita interview, he also says that. It is</p> <p>4 <VER000215> page 7. He says that he moved to</p> <p>5 Tinsley House because he couldn't work with you. Do you</p> <p>6 know why DCM Giraldo said this?</p> <p>7 A. I don't, because, as far as I was aware, he --</p> <p>8 Steve Skitt moved him to Tinsley House. He didn't move</p> <p>9 himself.</p> <p>10 Q. I want to ask you now about staffing levels. We have</p> <p>11 touched on that in relation to training. If we can</p> <p>12 bring up, please, on screen <CJS000462> page 4. This is</p> <p>13 a residential update that you gave to the SMT meeting on</p> <p>14 23 August 2016. It should be the top of the page there</p> <p>15 under the heading "BH residential (JW)". It says:</p> <p>16 "Updated on staffing issues due to covering other</p> <p>17 areas."</p> <p>18 What did you mean by "staffing issues"?</p> <p>19 A. One of the main issues was staffing on the wings. It</p> <p>20 was one area which was always being ripped apart and</p> <p>21 also activities. So if staff were short on the wings,</p> <p>22 then staff would be pulled away from activities or</p> <p>23 visits to cover wing staff.</p> <p>24 Q. How regularly did that happen?</p> <p>25 A. Weekends was a main area. Again, this was due to</p> <p style="text-align: center;">Page 48</p>

12 (Pages 45 to 48)

<p>1 sickness as well. And also whatever was happening</p> <p>2 within the centre at times. Certainly, if we'd have had</p> <p>3 escorts on, then staff would be taken from the wings to</p> <p>4 cover this; if we had constant supervision on, staff</p> <p>5 would be taken away from wings, from visits, from</p> <p>6 activities, to cover constant supervisions. So – but</p> <p>7 on weekends, the staffing level was slightly lower and</p> <p>8 so had more of an impact on the weekend.</p> <p>9 Q. What effect did the lack of staff in activities have on</p> <p>10 detained persons?</p> <p>11 A. It meant that some of the areas couldn't be opened,</p> <p>12 simple as that, and we sort of, like, aimed to make sure</p> <p>13 the main areas, which was like the gym, the courtyard,</p> <p>14 and the library and the computer room, were always open</p> <p>15 for them.</p> <p>16 Q. You have raised that in that meeting, the SMT meeting,</p> <p>17 in August 2016. What, if anything, was done about it?</p> <p>18 A. It would go back to detail. Detail would be asked to</p> <p>19 look at it, why there was an issue, what happened, was</p> <p>20 it a staffing issue, had staff phoned in sick? And so</p> <p>21 detail would be asked to look into it and to find out</p> <p>22 the reasons why there was a shortage of staff for that</p> <p>23 particular weekend or that period.</p> <p>24 Q. Did you get feedback after that?</p> <p>25 A. If I went and asked for it, yes. Otherwise, I left it</p> <p style="text-align: center;">Page 49</p>	<p>1 lines 228 to 232. Ms Lampard asks:</p> <p>2 "Question: When was that, [was that for the period</p> <p>3 we are] talking about?</p> <p>4 "Answer: That would be 2016/17.</p> <p>5 "Question: When did you go off the wing?</p> <p>6 "Answer: January 2017, so yes, it would be more</p> <p>7 2016. That's when I was at breaking point. For</p> <p>8 instance, there was one day where it was myself and</p> <p>9 Louis Jacks on Delta and two officers on Charlie wing,</p> <p>10 DCM Steve Dicks came onto Delta wing and said, one of</p> <p>11 you needs to go to the courtyard. I said, that's not</p> <p>12 going to happen. He said, why? I said, there are only</p> <p>13 two of us on a wing [and the contract] minimum is two at</p> <p>14 a time. That was the requirement at the time, I'm not</p> <p>15 sure it's changed, so no, I'm not going go do it,</p> <p>16 Louis's not going to do it. We've been on Delta wing</p> <p>17 for a few years now, we are established. DCO Dicks</p> <p>18 said, that's fine, and walked off."</p> <p>19 Was that something that you were aware of, that</p> <p>20 there sometimes would be only two people on a wing?</p> <p>21 A. Yes.</p> <p>22 Q. Was that enough, in your view?</p> <p>23 A. No.</p> <p>24 Q. Why not?</p> <p>25 A. The daily running of a wing for 12 hours can be very</p> <p style="text-align: center;">Page 51</p>
<p>1 to senior management because these meetings would be</p> <p>2 brought up, and so I left it -- I left it at that, for</p> <p>3 them to look into.</p> <p>4 Q. Was this a regular issue?</p> <p>5 A. If I remember right -- because you had two shift</p> <p>6 patterns. So one shift would always be pretty hefty,</p> <p>7 would be pretty good with staff. The other one would be</p> <p>8 slightly reduced, and that would be because of sickness</p> <p>9 and suspensions and stuff like that. And so, whenever</p> <p>10 that weekend would come up for that shift pattern, there</p> <p>11 was always going to be an issue until staff returned</p> <p>12 back to work.</p> <p>13 Q. How often did that shift pattern come around?</p> <p>14 A. It would come around -- so it was a four on, four off</p> <p>15 shift pattern. So ...</p> <p>16 Q. So almost every other week?</p> <p>17 A. Yes, every other weekend.</p> <p>18 Q. So that issue happened every other weekend?</p> <p>19 A. For a while, yes, until staff returned, yes.</p> <p>20 Q. Was that during the relevant period as well, in 2017,</p> <p>21 can you remember?</p> <p>22 A. I'm not sure.</p> <p>23 Q. Can we please turn to the next document, and bring it</p> <p>24 up, <VER000260>, pages 13 to 14, please. This is</p> <p>25 a Verita interview with Stuart Davies, an ACO. It is</p> <p style="text-align: center;">Page 50</p>	<p>1 demanding on members of staff. You've got one on the</p> <p>2 door, opening and closing the door all day long, and</p> <p>3 you've got the other one walking around the wing doing</p> <p>4 responsibilities in the wings and all the rest of it.</p> <p>5 At the same time, they're trying to man the office to</p> <p>6 help with detainees enquiries and all the rest of it.</p> <p>7 So three was what they needed on the wing to run a wing</p> <p>8 successfully without any issues.</p> <p>9 Q. He goes on to say, at paragraph 232, in the middle of</p> <p>10 the paragraph:</p> <p>11 "It doesn't add up, you're breaking the contract by</p> <p>12 that. It's incidents like that that we felt necessary</p> <p>13 to call Whistleblower, because we had reported this to</p> <p>14 managers, we had reported this to Jules, we reported</p> <p>15 this to ?Beck and it kept going on."</p> <p>16 Do you recall Stewart Davis contacting you about</p> <p>17 this particular issue?</p> <p>18 A. He may have done. I don't recall it, but he may well</p> <p>19 have reported it to me.</p> <p>20 Q. If he did report it to you, do you remember raising this</p> <p>21 with senior management, apart from the time that we have</p> <p>22 seen in August 2016?</p> <p>23 A. If he reported this to me, I would have then contacted</p> <p>24 the DCM to find out what's going on, why aren't there</p> <p>25 staff there and got them to deal with it.</p> <p style="text-align: center;">Page 52</p>

13 (Pages 49 to 52)

<p>1 Q. He says "it kept going on". That suggests that the 2 problem with staffing persisted. Would you agree that 3 it persisted from 2016 to 2017?</p> <p>4 A. Yes. If you -- because -- it may well have started out 5 with three officers that day on that wing, but then, if 6 they had an external escort, then the staff had to be 7 taken from somewhere which would then leave them to two 8 officers on a wing. So it was an ongoing thing.</p> <p>9 Q. I want to take you now to minutes of an SMT meeting on 10 9 February 2017, <CJS000555> page 1. It is item 3 11 "Matter arising": 12 "BS [Ben Saunders] updated about staff engagement 13 and staff retention -- need to organise focus groups and 14 ways to support staff." 15 Then later, starting with "Vision" at the bottom 16 there: 17 "Vision -- BS [Ben Saunders] asked for feedback on 18 the new poster. DH [Dan Haughton] said that 'a great 19 place to work' might not resonate with staff and MB 20 [Michelle Brown] it was [not] a vision not where we are 21 at the moment." 22 Do you agree that it wasn't a great place to work?</p> <p>23 A. I agree it is not a great place to work in the length of 24 hours staff done. It was totally unfair for asking them 25 to be -- to work 12 hours. It could be very draining on</p> <p style="text-align: center;">Page 53</p>	<p>1 Q. Did you feel they did something about it?</p> <p>2 A. I believe -- I think something did change. I can't 3 remember when. I know they -- they done vast recruiting 4 drives to increase the staffing levels to make it easier 5 for the staff on the wings.</p> <p>6 Q. Just pause there. Was this after Panorama? So in the 7 end of 2017/beginning of 2018?</p> <p>8 A. I can't remember whether it was after or before, but 9 I know they done significant recruitment drives to get 10 staff in.</p> <p>11 Q. I'm going to ask you about the additional extra beds?</p> <p>12 A. Yes.</p> <p>13 Q. Do you remember, in early 2017, there were 60 additional 14 beds that were introduced over three wings. You have 15 said in your witness statement in paragraph 9 that there 16 was no increase in staff.</p> <p>17 A. Yes.</p> <p>18 Q. Steve Skitt in his witness statement -- I won't bring it 19 up -- <SER000455>, page 29, says the opposite to you at 20 paragraph 84. He says: 21 "Extra staffing and some scope for greater activity 22 was built into the contract for these beds." 23 Was that your impression?</p> <p>24 A. I believe at the time -- I don't -- Steve Skitt said 25 extra staff. I believe the extra staff was just</p> <p style="text-align: center;">Page 55</p>
<p>1 them. So I agree with that. I also agree in respect 2 that there may well have been staff shortages at times, 3 which also then put a lot of pressure on staff, which 4 made their job a lot harder, so, yes, I would agree with 5 that in that respect.</p> <p>6 Q. You said in your witness statement that it might not 7 resonate staff because of the long hours, which you just 8 mentioned, and because staff believed they were not 9 listened to. Who were they not listened to by?</p> <p>10 A. That would be by senior management.</p> <p>11 Q. You were part of the senior management team, weren't 12 you?</p> <p>13 A. Yes.</p> <p>14 Q. So do you include yourself in that?</p> <p>15 A. Yes.</p> <p>16 Q. Why did you not listen to staff?</p> <p>17 A. I would have listened to staff on what I needed to deal 18 with. What these staff, I believe, are talking about is 19 the hours and the shift patterns and stuff like that and 20 the sickness, is what I believe they're talking about.</p> <p>21 Q. Why did you not listen to them in that respect about the 22 long hours, and so on?</p> <p>23 A. Because there's nothing I could do about it. All 24 I could do is pass it up to Ben Saunders, Steve Skitt, 25 for them to look at. I could do nothing about it.</p> <p style="text-align: center;">Page 54</p>	<p>1 replacing staff that had already left, in that respect.</p> <p>2 Q. So there wasn't net extra staff?</p> <p>3 A. I don't believe there was net extra staff, no; I believe 4 they were just replacing staff that had already left.</p> <p>5 Q. We heard from Lee Hanford yesterday there were not 6 enough activities for people who were detained before 7 the 60 beds were introduced, never mind once they were. 8 Do you agree with that?</p> <p>9 A. Yes. Yes. The activities were, like I said earlier, 10 minimum. We made best use of what was available, rooms 11 and all the rest of it. We did try to do a little bit 12 more for them, but whether that was because of the extra 13 60 beds, I'm not sure. Like a cinema room, and stuff 14 like that. But I don't think that was actually because 15 of the extra beds. I think that was just something we 16 was trying to do anyway.</p> <p>17 Q. Did the having 60 extra detained persons, did that have 18 an effect on any other aspects of the regime?</p> <p>19 A. It worked out that there would be 120 on a wing across 20 the three wings, so it didn't really have that much of 21 an impact on the wings itself or the activities other 22 than what was already there.</p> <p>23 Q. I want to ask you now about ACDT and mental health of 24 detainees. You say in your first witness statement at 25 paragraph 10:</p> <p style="text-align: center;">Page 56</p>

14 (Pages 53 to 56)

<p>1 "Some detainees did slip through the net because 2 they did not show outward signs of issues or did not 3 speak out about their issues to officers or healthcare 4 staff or there was language barrier problems." 5 What did you see as outward signs of issues or 6 mental health? 7 A. Sorry, can you say -- where is that? 8 Q. It's your first witness statement, page 3, paragraph 10. 9 A. It's not in there. 10 THE CHAIR: It's actually the beginning -- at the top of 11 page 4, I think, of your first witness statement. If 12 you just turn the page. 13 A. Right, sorry. 14 MS TOWNSHEND: Apologies. Thank you, chair. 15 It is right at the bottom of that paragraph, page 4. 16 Can you see: 17 "(c) we worked alongside in-house nursing staff." 18 Can you see that paragraph? 19 A. Is that my first statement, you said? 20 Q. It is your first statement, page 4. It should be after 21 the first tab. Can you see at the top (a), (b), (c) and 22 then (a), (b), (c)? 23 A. Yes. Right, yes, I'm with you now. Sorry. 24 Q. That's okay. The last sentence of that paragraph says: 25 "Some detainees did slip through the net because</p> <p style="text-align: center;">Page 57</p>	<p>1 A. Yeah -- 2 Q. You said some slipped through the net? 3 A. -- I mean by demonstrating self-harm, is what I mean, 4 "outward signs" or coming to us saying, "I've got mental 5 health problems. I'm hearing stuff in my head. I need 6 to speak to someone". 7 Q. Did you know what to look out for, apart from somebody 8 saying, "I'm going to self-harm" or, in fact, 9 self-harming? 10 A. Yes, there was other signs, detained people being 11 withdrawn by staying in their room, not coming out of 12 their room, would also be a sign; being a bit of a loner 13 when they was out and about would also be something we 14 would pick up on. So there's other outward signs as 15 well we would pick up on that somebody perhaps was 16 struggling. 17 Q. Did you have any training on how to look out for the 18 outward signs of mental health? 19 A. We -- sorry, I say "we". I did attend a one-day 20 training course with healthcare regarding mental health 21 issues. 22 Q. When was that? Was that at the beginning of your time 23 at Brook House? 24 A. No, no, that was years later, but I did attend 25 a training course, yes.</p> <p style="text-align: center;">Page 59</p>
<p>1 they did not show outward signs of issues or did not 2 speak out about their issues to officers or healthcare 3 staff or language barrier problems." 4 A. Yes. 5 Q. My question was, what are outward signs of mental health 6 issues? 7 A. Basically, detainees -- we had -- we used to do 8 a monthly review of detainees on the wings to make sure 9 they was okay, and all the rest of it. 10 Q. A monthly review? 11 A. A monthly review with detainees on the wings. 12 Q. Do you mean all detainees or do you mean just detainees 13 under ACDT? 14 A. All detainees on the wings should have had a monthly 15 review on them. So these questions would be asked how 16 they were then, how they felt. They would have the same 17 questions when they first arrived in the centre, whether 18 they had any mental health issues or tendencies of 19 suicidal. They would be asked a few days later, again, 20 the same question to making sure that they didn't have 21 any -- they didn't show anything -- or tell us anything. 22 So we done everything we could to pick up whether they 23 had any suicidal thoughts or tendency thoughts in that 24 respect. 25 Q. You have said outward --</p> <p style="text-align: center;">Page 58</p>	<p>1 Q. And it was just one day? 2 A. I believe so, yes. 3 Q. Was that the only mental health training you had in the 4 whole of those nine years? 5 A. Yes, I believe so. And I think that's because we were 6 pushing it for some kind of training because it was 7 a case of, we had to train so we could deal with people 8 with these issues rather than not deal with them and 9 also recognise signs and stuff like that. 10 Q. Did you feel confident that you could recognise the 11 signs of somebody who was struggling from mental 12 ill-health? 13 A. Only through experience, not through training. Only 14 through experience that I was able to pick stuff up. 15 Q. Would you have benefited from more mental health 16 training? 17 A. Yes. 18 Q. You said that you only got that one-day mental training, 19 having badgered, presumably, senior management for it? 20 A. Yeah, well, we kept asking for it. I -- at one stage, 21 I did arrange for a small group of people to attend 22 a course at college, but that fell through, and so we 23 then reverted back to our own healthcare for training, 24 and I think senior -- the senior management then 25 arranged it properly through healthcare.</p> <p style="text-align: center;">Page 60</p>

15 (Pages 57 to 60)

<p>1 Q. And that was the one day you're talking about?</p> <p>2 A. Yes.</p> <p>3 Q. You said that there were language barrier problems. Are</p> <p>4 you suggesting that detained persons who did not speak</p> <p>5 English had less protection, had less help, from</p> <p>6 healthcare?</p> <p>7 A. No, because they would use the LanguageLine, the same as</p> <p>8 we would. So it was there, available for them, or</p> <p>9 bigword, available for them to use the same as what we</p> <p>10 had.</p> <p>11 Q. Why did you say that some detainees slipped through the</p> <p>12 net in part due to language barrier problems?</p> <p>13 A. Oh, yeah, sorry. Basically, because they couldn't speak</p> <p>14 English, so they couldn't get it across at the end of</p> <p>15 the day, I suppose that's all I'm referring to there.</p> <p>16 Q. So do you think that -- bigword, was it, the company</p> <p>17 that was used for interpreting?</p> <p>18 A. Yes.</p> <p>19 Q. Do you think that wasn't effective?</p> <p>20 A. It was effective when they got -- when they were used.</p> <p>21 I found them effective many a times when I used them.</p> <p>22 Q. So why did you say that some detainees slipped through</p> <p>23 the net?</p> <p>24 A. Because of not recognising signs.</p> <p>25 Q. Was that due to lack of training of officers, do you</p> <p style="text-align: center;">Page 61</p>	<p>1 think?</p> <p>2 A. I think all the wings viewed it the same: if a detainee</p> <p>3 is not eating, but was seen taking food or buying food</p> <p>4 from the shop, because they could actually generate</p> <p>5 a hot meal for themselves, then, yes, it was the same</p> <p>6 across all the wings.</p> <p>7 Q. You said in your Verita interview, page 23 -- no need to</p> <p>8 go to it now -- that an ACDT was rarely opened for fluid</p> <p>9 or food refusal; is that right?</p> <p>10 A. Yes. In the early days, it used to be raised, it used</p> <p>11 to be opened, but then, like I said, policies changed</p> <p>12 and so it didn't need to be opened straight away.</p> <p>13 MS TOWNSHEND: Chair, I have probably around 15 minutes</p> <p>14 left. I don't know whether you'd like to have a break</p> <p>15 now for 15 minutes or continue? Entirely in your hands.</p> <p>16 THE CHAIR: I think we will continue for 15 minutes, if</p> <p>17 that's okay.</p> <p>18 MS TOWNSHEND: Thank you. I want to ask you now about</p> <p>19 drugs, Mr Williams. If I can take you to the document</p> <p>20 <CJS000530>, page 3. These are minutes of an SMT</p> <p>21 meeting on 28 April 2016. Just go to the top. It</p> <p>22 should read, and I will read it now, the second line:</p> <p>23 "Intel to do searching at Brook House but not being</p> <p>24 closed off. Not enough staff to do full searches.</p> <p>25 Discussions about where the resources come from to do</p> <p style="text-align: center;">Page 63</p>
<p>1 think?</p> <p>2 A. Yeah, perhaps.</p> <p>3 Q. I want to ask you about food refusal. Is it correct</p> <p>4 that the policy requires someone to be identified as</p> <p>5 refusing food if they miss two meals from the servery?</p> <p>6 Is that right?</p> <p>7 A. To be honest with you, I can't remember -- it's --</p> <p>8 because the policy has changed so many times over what's</p> <p>9 reported, what's not reported, to the Home Office and</p> <p>10 what's raised as an ACDT and not an ACDT. Someone who</p> <p>11 hasn't -- is classed as someone not eating -- not</p> <p>12 necessarily food refusal, but purely not eating for that</p> <p>13 day.</p> <p>14 Q. But there would be a food refusal log, wouldn't there,</p> <p>15 that you were required to fill out?</p> <p>16 A. Yes.</p> <p>17 Q. You said in your witness statement at paragraph 91, the</p> <p>18 first one, that food and fluid refusal policy was not</p> <p>19 followed if, for example, a detained person was buying</p> <p>20 food from the shop; is that right?</p> <p>21 A. Yes.</p> <p>22 Q. Even though that is not, in fact, the correct policy, is</p> <p>23 it? It was about taking meals from the servery?</p> <p>24 A. Yes.</p> <p>25 Q. Was that ignorance of the policy widespread, do you</p> <p style="text-align: center;">Page 62</p>	<p>1 full searches and who are doing them."</p> <p>2 You were present at this meeting. Were extra</p> <p>3 resources provided for this, to do full searches?</p> <p>4 A. I don't think extra resources were provided. What we</p> <p>5 had to do was change the way -- or the timing of</p> <p>6 searches, so we had additional staff around the centre</p> <p>7 to carry out these searches.</p> <p>8 Q. So additional staff were provided to carry out the</p> <p>9 searches?</p> <p>10 A. I believe so, yeah. We would take staff from visits</p> <p>11 maybe to help with the searching or, depending on the</p> <p>12 time, if we'd get the office closed and the staff on the</p> <p>13 wing, we'd then go off and do a certain amount of</p> <p>14 searches.</p> <p>15 Q. So were you confident that searches were properly taking</p> <p>16 place following this meeting?</p> <p>17 A. I believe -- yeah, I believe at times they did struggle</p> <p>18 but, again, what came out of meetings was that they need</p> <p>19 to be done, we have to make the effort to get them done,</p> <p>20 and so we have to do what needs to be done to get them</p> <p>21 completed.</p> <p>22 Q. We can take that down, thank you.</p> <p>23 Nathan Ward makes the following allegations in his</p> <p>24 witness statement. I won't bring it up. But he says:</p> <p>25 "When two members of staff were suspended pending</p> <p style="text-align: center;">Page 64</p>

16 (Pages 61 to 64)

<p>1 police investigation regarding drugs, it was extremely 2 hard to contact one of them. However, Jules Williams, 3 who had brought one of them into the company, was always 4 able to make contact with him. Poor culture amongst 5 Brook House residential staff and it is as though some 6 are protected by Jules Williams and this goes 7 unchallenged."</p> <p>8 Were you aware of staff bringing drugs into the 9 centre?</p> <p>10 A. First of all, I never brought anyone into the company. 11 I never have in 24 years. So I don't know where 12 Nathan Ward has got that information from.</p> <p>13 I wasn't aware of staff bringing drugs into the 14 centre until they were suspended, and as to contacting 15 them, if I was to -- appointed by HR to be their contact 16 manager, then I would do what it takes to contact them 17 by phone, leave messages for them.</p> <p>18 Q. Was it true that you were always able to make contact 19 with staff --</p> <p>20 A. No.</p> <p>21 Q. -- pending police investigations --</p> <p>22 A. No.</p> <p>23 Q. -- even when it was difficult to contact them otherwise?</p> <p>24 A. Well, there's two things: one, there's no reason -- if 25 I was the contact manager, there'd be no reason for</p> <p style="text-align: center;">Page 65</p>	<p>1 any involvement in myself, then that would have come 2 through -- via security. But, otherwise, it was just 3 security-led intelligence, and they would deal with it 4 and I wouldn't even know it was happening until these 5 members of staff were suspended.</p> <p>6 Q. I'll bring us on now to disciplinary and grievances. 7 You said in your first witness statement, paragraph 55, 8 that your role generally was to carry out 9 investigations, and then -- that were given to you by 10 a head of department, such as security, HR, head of 11 residence and so on, and that included viewing CCTV, 12 reading reports, interviewing staff and so on.</p> <p>13 In terms of disciplinary grievances concerning you, 14 there was one disciplinary matter which you were 15 involved in, and that was a formal investigation in 16 which Sarah Newland appeared to have conducted the 17 investigation. We know this from notes of 18 Jerry Petherick's visit to Gatwick in October 2014. I 19 won't bring them up, but they are at <VER000103> at 20 page 2. Can you explain what this investigation was 21 into and what the outcome was, please?</p> <p>22 A. Basically, one weekend I was in the office with other 23 members of staff and I was mucking about with a banana. 24 One of the members of staff was a lesbian in there and, 25 for some strange reason, a couple of days later, it</p> <p style="text-align: center;">Page 67</p>
<p>1 anyone else trying to contact them because any 2 information would have gone through me, other than via 3 letter; secondly, I didn't contact them straight away. 4 I would have to leave messages. Sometimes it would two 5 or three weeks before they would come back to me.</p> <p>6 Q. Jerry Petherick says in his interview <CJS0073667> 7 page 3 -- no need to go to it now. He says: 8 "My take on him [that's you] is that he is clumsy, 9 no sophistication, but Lee Hanford, interim director at 10 Gatwick currently, believes Jules would not tolerate 11 such behaviour."</p> <p>12 You said in your witness statement that what you 13 believed -- this is in your second witness statement, 14 paragraph 34. You say that Lee Hanford saw you as 15 a straight-down-the-middle person and if you knew anyone 16 was taking or bringing in drugs, "I would [support] it". 17 Were there teams --</p> <p>18 A. "I would report it".</p> <p>19 Q. "Report it", sorry, that was my mistake, "report it". 20 Were there times when you demonstrated this, that you 21 had to report anyone bringing in drugs?</p> <p>22 A. I never actually came across anyone bringing in drugs, 23 so I was never put in that position throughout my time 24 there. It's as simple as that. I know it was always 25 security led and security dealt with it. If there was</p> <p style="text-align: center;">Page 66</p>	<p>1 come -- it was suggested that I'd been homophobic 2 towards this member of staff. I was spoken to by 3 Michelle Brown, who I apologised to, and apologised to 4 the two members of staff. A few days later, an 5 investigation was opened up on me. Sarah Newland 6 conducted it. I was found not guilty of 7 the allegations, but my behaviour was not befitting of 8 a senior manager and so I was issued with a first and 9 final written warning.</p> <p>10 Q. So do you accept that your behaviour was not befitting 11 of a manager?</p> <p>12 A. Yes.</p> <p>13 Q. Turning briefly to a grievance meeting which took place 14 on 4 January 2017, which included bullying by 15 Luke Instone-Brewer and Babs Fagbo. We have a document, 16 I won't bring it up, <CJS0073633>, page 4, where it was 17 said that: 18 "Jules is known to be friendly with other DCMs and 19 officers and staff are concerned about raising issues." 20 This was in relation to Luke Instone-Brewer and 21 Babs Fagbo bullying, and in relation to Stacie Dean. 22 Were you friends with Luke and Babs?</p> <p>23 A. Yes.</p> <p>24 Q. You said in your second witness statement that you don't 25 think the nature of those relationships with other</p> <p style="text-align: center;">Page 68</p>

17 (Pages 65 to 68)

<p>1 members of staff had an impact on the willingness to</p> <p>2 speak up and raise issues, but do you know any other</p> <p>3 reason why Stacie Dean would say this?</p> <p>4 A. I believe it's because of my relationship with some</p> <p>5 members of staff, like -- I mean, yes, I got on with</p> <p>6 Babs during work, but, externally, I'd been out</p> <p>7 socialising with Luke. So I believe that's because of</p> <p>8 my relationship with some of the staff externally.</p> <p>9 Q. Did you let those relationships that you had with staff</p> <p>10 externally affect any of your decision making within the</p> <p>11 centre?</p> <p>12 A. No.</p> <p>13 Q. I want to ask you finally about your departure from</p> <p>14 Brook House. You have said in your witness statement --</p> <p>15 in your second witness statement that you were</p> <p>16 struggling with the documentation side of things, and</p> <p>17 that you were constantly chasing DCMs for paperwork and</p> <p>18 had to fill them out. Michelle Brown says in her</p> <p>19 witness statement that, in August 2017, there was</p> <p>20 a conversation about you struggling in the role and that</p> <p>21 you were potentially going to be demoted. The</p> <p>22 suggestion is that nothing happened due to the Panorama</p> <p>23 broadcast.</p> <p>24 In your witness statement, what paperwork are you</p> <p>25 referring to that you had problems with?</p> <p style="text-align: center;">Page 69</p>	<p>1 Q. Did you struggle with any other aspects of your job?</p> <p>2 A. Not as far as I know.</p> <p>3 Q. Michelle Brown talks there about the possibility of</p> <p>4 being demoted. Did you know that at the time?</p> <p>5 A. No.</p> <p>6 Q. Were you spoken to about any problems, apart from what</p> <p>7 you have just referred to, the investigation</p> <p>8 disciplinaries and --</p> <p>9 A. I was spoken to about the cleanliness about the centre.</p> <p>10 That was one of my areas. Because, obviously, like</p> <p>11 I said previously, the Home Office would do their</p> <p>12 walk-around and pick up areas in the centre, so I'd be</p> <p>13 spoken to about that.</p> <p>14 Q. Were any actions taken to support or assist you?</p> <p>15 A. No. I just -- I was just given this information and</p> <p>16 then got on with it.</p> <p>17 Q. You said in your second statement, paragraph 11, that</p> <p>18 eventually there was put in place a new head of</p> <p>19 residence?</p> <p>20 A. Yes.</p> <p>21 Q. So you had a direct line. So that missing link that</p> <p>22 Lee Hanford had been speaking about was then filled in?</p> <p>23 A. Yes.</p> <p>24 Q. So does that mean that the head of residence then was</p> <p>25 your direct manager?</p> <p style="text-align: center;">Page 71</p>
<p>1 A. I'm referring to carrying out investigations and</p> <p>2 grievances because they were all time bound. I'm also</p> <p>3 referring to the Corn dell management programme, because</p> <p>4 I believe that had a greater impact as well because</p> <p>5 I was seen as not participating in it correctly or</p> <p>6 help -- or trying to complete it in any stage, and I was</p> <p>7 spoken to by management, senior management, on a couple</p> <p>8 of times as to why I wasn't completing it on time.</p> <p>9 Q. You have already given your explanation as to why you</p> <p>10 didn't complete it on time. You said due to</p> <p>11 understaffing.</p> <p>12 A. Mmm.</p> <p>13 Q. But what about the investigations?</p> <p>14 A. Again, investigations and grievances, it could be</p> <p>15 delayed because of the staff not being in the centre,</p> <p>16 off sickness, I would have to wait for them to come back</p> <p>17 on shift patterns, and sometimes I'd have five or six</p> <p>18 staff come back, they could be on holiday, so I'd have</p> <p>19 to wait, and so sometimes investigations and things got</p> <p>20 delayed that way.</p> <p>21 Q. Those are just the usual types of issues?</p> <p>22 A. Yes.</p> <p>23 Q. But was there anything above and beyond that that</p> <p>24 stopped you from conducting investigations in time?</p> <p>25 A. No.</p> <p style="text-align: center;">Page 70</p>	<p>1 A. Yes.</p> <p>2 Q. Who was that?</p> <p>3 A. Mark Demian.</p> <p>4 Q. When did that take place?</p> <p>5 A. I believe that was January 2018.</p> <p>6 Q. Finally, I won't bring it up, but Lee Hanford has said</p> <p>7 this <CJS0074048> page 8, paragraph 28:</p> <p>8 "During my second period ..." which was just after</p> <p>9 the relevant period. He came into post</p> <p>10 in September 2017:</p> <p>11 "... it became apparent that due to increasing</p> <p>12 demands on service delivery Jules was struggling.</p> <p>13 Managers who were reporting to him reinforced this</p> <p>14 opinion. Areas of service delivery were failing and</p> <p>15 causing frustrations amongst staff and detainees. Jules</p> <p>16 was not embracing the investment that G4S had made</p> <p>17 towards his development, despite further support being</p> <p>18 offered, and he left the company in July 2018."</p> <p>19 Was further support offered?</p> <p>20 A. No.</p> <p>21 Q. Why did you leave Brook House?</p> <p>22 A. I was actually made redundant. Lee Hanford had</p> <p>23 obviously spoken to his seniors and it was decided for</p> <p>24 me that I was no longer required as I was not committed,</p> <p>25 and so I was made redundant.</p> <p style="text-align: center;">Page 72</p>

18 (Pages 69 to 72)

<p>1 Q. Was it true? Did you feel it was true that you were not 2 committed?</p> <p>3 A. I didn't think it was true at all.</p> <p>4 MS TOWNSHEND: Thank you, Mr Williams. I don't have any 5 more questions. Chair, do you have any questions?</p> <p>6 THE CHAIR: I don't have any questions for you, Mr Williams. 7 Thank you very much for coming this morning. I know it 8 is not an easy experience, but I'm grateful that you 9 have come and given evidence to the inquiry today.</p> <p>10 Ms Townshend, shall we take 20 minutes? We are 11 having a change of witness.</p> <p>12 MS TOWNSHEND: Yes, thank you, 12.05 pm. 13 (11.50 am)</p> <p>14 (A short break) 15 (12.08 pm)</p> <p>16 MS MOORE: Good afternoon, chair. We have the evidence now 17 of Mr Haughton.</p> <p>18 MR DANIEL JAMES HAUGHTON (affirmed) 19 Examination by MS MOORE</p> <p>20 MS MOORE: Good afternoon, Mr Haughton. Could you confirm 21 for us your full name?</p> <p>22 A. Yes, my name is Daniel James Haughton.</p> <p>23 Q. You have there a white folder of documents, which I may 24 refer you to, or I might show them on the screen. At 25 tab 1 is your witness statement which you made to the</p> <p style="text-align: center;">Page 73</p>	<p>1 manager role, and is that an E1 role?</p> <p>2 A. That's an E1 role, yes.</p> <p>3 Q. We have heard that E1 is sort of in between DCM and 4 senior management?</p> <p>5 A. Yes, that's correct.</p> <p>6 Q. Then you secured a permanent E1 role in July 2016, and 7 this was support services?</p> <p>8 A. Yes. So the role was changed to support services, but 9 yes.</p> <p>10 Q. I hope we can have on screen <CJS0072810>. You have 11 already commented on this in your witness statement. If 12 we go to page 2. This is an organogram or a chart --</p> <p>13 A. Yes.</p> <p>14 Q. -- of G4S as it was during the relevant period. You are 15 there, on the left-hand side, as head of support 16 services. You say, actually, that's not the correct 17 title?</p> <p>18 A. It was just known as support services manager. "Head 19 of" normally denoted you were part of the SMT; 20 a D grade, they referred to them as.</p> <p>21 Q. You were, as you said, an E1?</p> <p>22 A. Yes.</p> <p>23 Q. Underneath that is the list of responsibilities, so 24 contracts, auditing, complaints, training, health and 25 safety. You say C&R, in fact, wasn't part of your role?</p> <p style="text-align: center;">Page 75</p>
<p>1 inquiry and you signed on 2 March 2022. That statement 2 will be adduced in full and the reference for that is 3 <SER000453>. What that means, Mr Haughton, is, we won't 4 go over everything in your witness statement today. We 5 already have that as your evidence, and the chair can 6 consider all of it. We are going to focus on some of 7 the key issues.</p> <p>8 A. Okay.</p> <p>9 Q. So as to your background, you joined Brook House 10 in January 2009?</p> <p>11 A. Yes.</p> <p>12 Q. That was a DCO role. And that was to be trained for 13 when Brook House started accepting detainees 14 in March 2009?</p> <p>15 A. Yes.</p> <p>16 Q. So you have been there since the start?</p> <p>17 A. Since the start of Brook, yes.</p> <p>18 Q. You were promoted to team leader, which is later known 19 as DCM --</p> <p>20 A. Yes.</p> <p>21 Q. -- in September or October 2009. You say in your 22 statement that you ended up working many of the DCM 23 roles in Brook House?</p> <p>24 A. Correct.</p> <p>25 Q. February 2016, you were seconded to an operations</p> <p style="text-align: center;">Page 74</p>	<p>1 A. No, it wasn't part of my role.</p> <p>2 Q. Whose did that fall under?</p> <p>3 A. During the relevant period, I can't quite remember. 4 I think it sat within security at the time and it sort 5 of remained there.</p> <p>6 Q. But the rest is correct?</p> <p>7 A. Yes, stores was sort of co-managed between 8 Jules Williams, who was just on -- took most of 9 the share of stores and I had an oversight for some of 10 the ACO areas, but that moved in sort of operations as 11 well.</p> <p>12 Q. What did the role of a support services manager in brief 13 kind of mean for you day to day? Were you doing lots of 14 different tasks within these, did you have an oversight?</p> <p>15 A. Yes, so it is having oversight of those different sort 16 of satellite functions, so it was -- had audits and 17 compliance as a team, complaints, training, health and 18 safety, central detail was also part of my remit, even 19 though it's sort of sitting under Michelle Brown there, 20 that was sitting in support services. So lots of -- 21 a number of small teams with a few people in those, so 22 it was touching base with lots of those people.</p> <p>23 Q. You have told us that during the relevant period, you 24 were -- while you were in this E1 role, part of that 25 included acting from time to time as duty director?</p> <p style="text-align: center;">Page 76</p>

19 (Pages 73 to 76)

<p>1 A. Yes, so we'd have a roster for duty director generally 2 once a week, and then, one every seven or eight 3 weekends, we would pick up duty director. 4 Q. How did that role differ from your normal day-to-day 5 role as support services manager? 6 A. So the duty director role was about oversight of 7 the centre, so we had operational sort of running -- 8 responsibility to run the centre day to day, so we would 9 look after sort of staffing issues, any incidents, 10 attend certain reviews and certain meetings. So it 11 was -- you sort of stepped away from your day job, to 12 a degree, to focus on doing duty director. 13 Q. I see. You're the senior person on the ground? 14 A. Senior person on site, yes. 15 Q. Your current role at Brook House, where you still work, 16 I understand? 17 A. Yes, so my current role is the assistant director of 18 safeguarding at Gatwick. 19 Q. So for all of the Gatwick sites? 20 A. For Brook House and Tinsley House. 21 Q. We heard yesterday from -- I want to ask about your 22 audits role. We heard yesterday, from Mr Castle and 23 Mr Gasson, some detail about contractual monitoring? 24 A. Yes. 25 Q. You discuss your role in this at page 22 of your</p> <p style="text-align: center;">Page 77</p>	<p>1 you take in preparing them? 2 A. So the compliance function that I oversaw -- I think the 3 reason why I completed this report is probably because 4 the manager in that area was off that month. 5 Normally -- 6 Q. Is that Barry Timms? 7 A. Yes, normally Barry at the time or Vicky, or one of 8 the other guys who was in post, would have completed 9 them. So generally, the role of that function would be 10 to compile all the management data from across the 11 contract. So all the other functions would feed in to 12 us their relevant data and we would compile it and put 13 it into this report. And this report was generated as 14 a result of the meetings, the weekly meetings, we had 15 with the Home Office, where they would accept or refuse 16 mitigation for the issues we raised, and that was what 17 we reported on this. 18 Q. So your role is more to collate all the information and 19 put it in one place, rather than to create that data; is 20 that right? 21 A. Yes, so all the functional heads would have completed 22 their end-of-month reporting and they would have sent it 23 all in to my function. 24 Q. Can we go to page 1 then of this report. So we have, 25 just to give an example of some of the things that are</p> <p style="text-align: center;">Page 79</p>
<p>1 statement, so paragraphs 87 to 89. I want to ask first 2 about the monthly reports. We heard a little 3 yesterday -- and I will try to not go over too much of 4 the same ground again -- about schedule G of 5 the contract? 6 A. Yes. 7 Q. In essence -- do correct me if I am wrong -- schedule G 8 is a list of performance measures, points attached to 9 them. When the measure isn't met, so when there is 10 a failure to meet that measure, this should be reported 11 to the Home Office and unless there is an accepted 12 mitigation, a reason why that wasn't met, it results in 13 a financial penalty? 14 A. Yes, that's correct. 15 Q. Can we look at an example from June 2017. You have it 16 at tab 3, but I will ask for it to be shown on the 17 screen. <CJS004586>. This is a monthly report, 18 obviously from the relevant period, June 2017, as we 19 see. If we quickly go to page 16 of that, we'll see 20 there it is signed by you and dated 7 July 2017. We see 21 below a list of who it is circulated to. So centre and 22 deputy -- sorry, centre manager, deputy centre manager, 23 and various Home Office parties, head of care and 24 regimes, et cetera. What's your role in preparing these 25 reports? Obviously you sign it off, but what role do</p> <p style="text-align: center;">Page 78</p>	<p>1 reported, the available detainee places, the total 2 number per the contract and the total number in fact and 3 any penalties which attach. At 2, there is the failure 4 to provide available services, penalties can attach to 5 that. At page 3, there is a list of untoward events. 6 That is not a general term, that is as defined in the 7 contract? 8 A. Yes. 9 Q. I won't go on to these, but at page 13, we see the total 10 points incurred for the month, we see penalty points 11 based on available DCO hours -- 12 A. Yes. 13 Q. -- so that's 14. As I said, total points there. At 14 page 14, penalty points which are based on the available 15 number of DCO hours. We heard yesterday, if that fell 16 below, we could have a penalty applied. And at 15, 17 there are some statistics as to the number of people who 18 were on rule 40, rule 42, the number of use of force 19 events, et cetera. So some of these pieces of data are 20 matters of counting. So, for example, the number of 21 rooms available, the number of DCO hours provided. 22 They're just things that you can tot up and count, 23 aren't they? 24 A. Yes. 25 Q. Then if we go back to page 3, please, some of them</p> <p style="text-align: center;">Page 80</p>

20 (Pages 77 to 80)

<p>1 required an element of judgment. So we were speaking</p> <p>2 yesterday about the self-harm resulting in injury data.</p> <p>3 A. Yes.</p> <p>4 Q. You mentioned that the data is provided by functional</p> <p>5 heads. Do you know who the head providing this element</p> <p>6 of data, the self-harm resulting in injury data, would</p> <p>7 have been?</p> <p>8 A. So it would have been who was looking after the Safer</p> <p>9 Community Team at the time. I think it -- I can't quite</p> <p>10 recall who it was. It was Michelle Brown or it might</p> <p>11 have been -- yeah, I can't quite recall exactly who it</p> <p>12 was. It sort of changed. It was quite fluid, at that</p> <p>13 time, with the senior management role, so it did move</p> <p>14 around a bit. But the functional head for that was</p> <p>15 reporting.</p> <p>16 Q. That's somebody at SMT level?</p> <p>17 A. Yes, the D grade would present that to us.</p> <p>18 Q. Obviously, not all incidents of self-harm resulting in</p> <p>19 injury need to be recorded here, and that's clear</p> <p>20 from -- if you look at the wording in schedule G, isn't</p> <p>21 it, because it is only those where there is a failure to</p> <p>22 follow processes?</p> <p>23 A. Mmm.</p> <p>24 Q. So, for example, and I won't ask you to look at it now</p> <p>25 on the screen, but the same month, June 2017, there's</p> <p style="text-align: center;">Page 81</p>	<p>1 the Home Office. It had to be with them within</p> <p>2 24 hours. So that would have detailed the sort of --</p> <p>3 the officers' version or account of events that had</p> <p>4 taken place. And also there's a monthly Safer Community</p> <p>5 meeting where, again, acts of self-harm are discussed</p> <p>6 and the results of investigations discussed. So had</p> <p>7 those investigations decided that that was relevant, it</p> <p>8 would have been reported as that to the Home Office.</p> <p>9 Q. Sure. You say that there is self-harm investigations</p> <p>10 after each -- after acts of self-harm. Is that after</p> <p>11 every act of self-harm?</p> <p>12 A. I think that was the intention. I can't tell you -- it</p> <p>13 wasn't my function. I can't tell you whether it did</p> <p>14 happen 100 per cent of the time. But they were supposed</p> <p>15 to happen.</p> <p>16 Q. Would they have been done by the Safer Community Team?</p> <p>17 A. Yes.</p> <p>18 Q. So you rely on the information that's given to you by</p> <p>19 the Safer Community Team --</p> <p>20 A. Yes.</p> <p>21 Q. -- in order to complete this part? You or whoever</p> <p>22 completed, Mr Timms --</p> <p>23 A. Yes, that specific part would be from Safer Community.</p> <p>24 Other parts would come from different functions, yes.</p> <p>25 Q. When reports weren't completed by you, but by Mr Timms,</p> <p style="text-align: center;">Page 83</p>
<p>1 a combined report which is a report that's provided to</p> <p>2 the IMB which records that there were nine acts of</p> <p>3 self-harm that month --</p> <p>4 A. Yes.</p> <p>5 Q. -- and three of which required treatment on site. So at</p> <p>6 least three resulting in injury. Do you know how the</p> <p>7 person who inputs the data here knows that the nine</p> <p>8 events of self-harm don't need to be reported?</p> <p>9 A. I think -- I'm not entirely sure of the wording for</p> <p>10 that. So that part of (c) is quite cut down. I think</p> <p>11 it --</p> <p>12 Q. That's right.</p> <p>13 A. I think it mentions around "resulting in injury that</p> <p>14 requires hospital", is it, hospital treatment?</p> <p>15 Q. I think it is just "healthcare treatment"?</p> <p>16 A. And it is a direct result of a failure of procedure.</p> <p>17 Q. That's not quite right. It is where it involves</p> <p>18 a failure to follow procedures set out in schedule D.</p> <p>19 A. So I know that, at the time, the Safer Community Team</p> <p>20 would have done self-harm investigations, so following</p> <p>21 an incident of self-harm, they would have done an</p> <p>22 investigation into that and would have looked to try and</p> <p>23 identify whether there was a failure under that. Every</p> <p>24 act of self-harm that occurred at Brook House was</p> <p>25 reported via an incident report and that was shared with</p> <p style="text-align: center;">Page 82</p>	<p>1 for example, did you have an oversight of the data in</p> <p>2 there?</p> <p>3 A. Yes.</p> <p>4 Q. Did you check it?</p> <p>5 A. So Barry or whoever was completing it would send it to</p> <p>6 me first for me to check before it was then submitted.</p> <p>7 Q. Just using this as one example, the self-harm resulting</p> <p>8 in injury, the data that you're provided, do you do any</p> <p>9 check on the adequacy or accuracy of that data?</p> <p>10 A. There would be some level of checks. I don't recall</p> <p>11 what checks we did. Generally, we would accept what we</p> <p>12 were being given by the functions and report back on</p> <p>13 what -- because they were the subject matter experts, so</p> <p>14 we'd report back on what they reported to us.</p> <p>15 Q. That would be, for self-harm, as you said, the Safer</p> <p>16 Community manager?</p> <p>17 A. Yes, much like, you know, if -- for security information</p> <p>18 reports and stats on other bits and pieces that we get.</p> <p>19 Q. We have heard, and we discussed yesterday with two of</p> <p>20 the witnesses, that during the relevant period, there</p> <p>21 were never any reports that found their way into these</p> <p>22 documents of self-harm resulting in injury that</p> <p>23 fulfilled the contractual requirements of schedule G.</p> <p>24 A. Yes.</p> <p>25 Q. Was that something you were aware of at the time?</p> <p style="text-align: center;">Page 84</p>

21 (Pages 81 to 84)

<p>1 A. I think, from recollection, it was very, very rare that 2 anything did result in that -- 3 Q. Yes. 4 A. -- you know? And still, you know, outside of 5 the relevant period, it was very rare for a self-harm 6 relating in injury to be a consequence of a failure of 7 procedure. 8 Q. Did you know that there was, in fact, a level of 9 self-harm -- for example, 60 events during the relevant 10 period. Did you know that there was self-harm, despite 11 that it isn't recorded? 12 A. Yes, that would have been reported on a different 13 end-of-month report. 14 Q. We see it, for example, in the combined reports that go 15 to the IMB? 16 A. Yes, so it was all reported in different reports. 17 Q. Did you ever question the fact that, despite the fact 18 that there was such -- you know, there was a level of 19 self-harm, there was none fulfilling the untoward event 20 requirement. 21 A. I never questioned it, no. 22 Q. Looking back, do you think it's something that could 23 have been looked into in more detail to ensure that 24 that -- 25 A. I think --</p> <p style="text-align: center;">Page 85</p>	<p>1 resulted in a penalty. But that requires that a DCM 2 says, "I made a mistake", potentially, or, "One of my 3 team made a mistake"? 4 A. Sure, yes. 5 Q. We have seen, for example, the evidence of 6 Mr Chris Donnelly. I don't know if you watched his 7 evidence on 23 February? 8 A. I didn't, no, but I'm aware of it. 9 Q. We have given you access, I think, to his transcript as 10 well. In brief, he was asked by Mr Altman about an 11 incident with D865 who tried to hang himself in his room 12 on 4 July 2017. In summary, Mr Donnelly didn't realise, 13 on entering the room, that D865, who was unconscious, 14 had a ligature around his neck. 15 A. Correct. 16 Q. It meant that that ligature wasn't removed for about two 17 minutes. Mr Donnelly accepts he should have checked for 18 a ligature immediately. He also accepted that, in the 19 forms about the event, he wrongly failed to record that 20 the two-minute delay had happened. So this is obviously 21 a case of self-harm involving injury? 22 A. Yes. 23 Q. The man was unconscious. Do you know -- it is not 24 a test, if you don't know, it is fine. Do you know if 25 this would be classed as a case involving a failure to</p> <p style="text-align: center;">Page 87</p>
<p>1 Q. -- data was accurate? 2 A. -- there's a number of things -- sorry, I spoke over 3 you. I think there's a number of things in that report 4 that never constituted a failure. So did I look at 5 self-harm differently to any of the other failures in 6 there that didn't have one? No. Obviously, that's not 7 to say it's not, you know, more serious than some of 8 the other things, but, no, I didn't actively go out and 9 think, "This is strange that it hasn't been reported". 10 Q. Do you know if anyone did? 11 A. I'm not aware of if anyone did or not, but, like I said, 12 you know, the Safer Community Team would have been 13 completing the reports. Knowing the people that -- you 14 know, especially the DCMs that were involved in some of 15 that stuff, they were very thorough. Should any 16 concerns have been raised by them about self-harm 17 resulting in a failure, that would have been raised and 18 it would have been investigated, and potentially 19 resulted in disciplinary procedures. So that would have 20 generated that failure. But in an absence of that, 21 then, no. But I do -- you know, I recall at the time 22 the team were very thorough. 23 Q. It requires, though, doesn't it, a level of 24 self-reporting, even though you say, for example, should 25 concerns have been raised by DCMs, that could have</p> <p style="text-align: center;">Page 86</p>	<p>1 follow procedures? 2 A. Looking at it, it could be. Yeah, it could be, 3 definitely. I wasn't aware of it at the time. 4 Q. Sure. 5 A. But a failure to identify a ligature is -- you know, 6 is -- on our part as a team is, you know, is an error, 7 a massive error. 8 Q. You say you didn't know at the time. That's the 9 problem, isn't it, because unless you know at the time, 10 it can't be reported? 11 A. Yes. 12 Q. You discuss a general point in your statement at 13 page 21, paragraph 86, some barriers that hindered you 14 from performing your role, and one of them included 15 a lack of a job description, and you say a lack of 16 support from Ben Saunders. Looking back now, did any of 17 these affect your ability to conduct audit and 18 compliancing, in your view? Compliance. 19 A. There will have been an impact. I mean, Ben -- yeah, 20 there was no support and there was no job description. 21 So in terms of, what do you turn to to decide what you 22 should be doing, it's difficult. I think it had an 23 impact not necessarily on the compliance, because the 24 compliance was about reporting data. 25 Q. Yes.</p> <p style="text-align: center;">Page 88</p>

22 (Pages 85 to 88)

<p>1 A. But in terms of managing action plans and compliance or 2 compliance as a result of action plans, it was 3 difficult, because there was no challenge for inaction. 4 Q. Had you -- you said there was no job description. Had 5 you had any training before you went into the role you 6 were in during the relevant period on auditing of 7 the type that we are looking at -- 8 A. No. 9 Q. -- and monthly reports. We have been talking then about 10 2017 and the G4S contract. Obviously, now there is 11 a new contract in place -- 12 A. Yes. 13 Q. -- which also contains similarly, I think, KPIs and 14 penalty points. Is it still within your remit to work 15 on and compile these reports? 16 A. I will compile management data for my function. 17 Q. Yes. Of the same sort of nature of what we looked at 18 now? 19 A. Only relating to mine, yes. 20 Q. Do you know -- and you might be able to say from your 21 experience within a slightly different part of 22 the jigsaw -- are they done on the same basis? So 23 functional heads or individual managers report it to one 24 person? 25 A. Yes.</p> <p style="text-align: center;">Page 89</p>	<p>1 Q. -- during the relevant period? 2 A. They would have been part of monthly meetings, yes. 3 Q. Were you at those meetings? 4 A. I would have been at SMT meetings. I would have been at 5 the monthly ops meetings with the Home Office, yes. 6 Q. You say, at paragraph 88, that you attended weekly 7 meetings to talk about the contract and your compliance 8 with it; is that right? 9 A. Yes. 10 Q. Was that meetings with the Home Office or just G4S? 11 A. No, it was Home Office. 12 Q. You say that this would have involved -- this is, again, 13 at paragraph 88 -- conversations about changes to the 14 contract? 15 A. Yes. 16 Q. Can you recall during the relevant period or thereabouts 17 whether anyone at these meetings suggested that the 18 contract should be changed to increase staffing levels? 19 A. I can't recall anyone bringing it up, no. Not as part 20 of a performance issue. 21 Q. Or at all? 22 A. No. I mean, we discussed staffing issues when -- after 23 Panorama. We increased -- so there were a number of 24 meetings about that. There were staffing meetings 25 because we were in a bid process at the time.</p> <p style="text-align: center;">Page 91</p>
<p>1 Q. And the one person, do they come back to you to audit 2 and check the quality of your data? 3 A. They will ask questions if they feel that it's not 4 correct. They will cross-reference against different 5 sources. And we are -- our functions are audited, so 6 contractually they're audited. Every DSO is audited and 7 every operating standard that falls into our function is 8 audited. So ... 9 Q. Who is it now who creates the sort of reports that we 10 see now for the purposes of applying -- 11 A. It is a much larger team. So back in 2017, when we were 12 doing it, it was myself overseeing Barry. Barry was 13 seconded in to cover a maternity cover. Now, there's 14 probably -- well, now there's an assistant director of 15 governance that looks after the team. There's 16 a number -- there's a couple of DOMs, I think two DOMs, 17 and then probably three or four officers -- 18 Q. So -- 19 A. -- in audits and compliance. 20 Q. -- DOM is the new -- 21 A. DOM is the new DCM, yes. 22 Q. Fine. Thank you. The reports that we have just seen, 23 were they discussed at a meeting, the performance 24 points -- 25 A. The performance points --</p> <p style="text-align: center;">Page 90</p>	<p>1 Q. Yes. 2 A. But in those weekly meetings, I don't recall anyone 3 having discussions about increasing staffing. It was 4 normally myself and Barry or Barry and the Home Office. 5 Ultimately, it was a Home Office contract. So if they 6 wanted to increase staffing, they could have changed the 7 contract and changed it. 8 Q. Equally, if you thought -- "you" as in G4S -- wanted to 9 increase staffing -- 10 A. We could have gone to them and asked to increase, yes. 11 Q. You mentioned the staffing around the bid, so you cover 12 this in your statement at 84 to 85. It is page 21. 13 Under the heading "Management decisions/the contract". 14 You say there at 84 -- can we show it on screen, 15 <SER000453>, page 21. Paragraph 84 on that page: 16 "I recall a decision made by Ben Saunders to run 17 staffing levels below the typical head count. This was 18 prior to an upcoming contract renewal. The upcoming 19 contract had a lower number of staff than levels at the 20 time. Therefore, Ben took the decision to not recruit 21 to our target number of staff (but wanted to keep 22 staffing to contractual requirements) on the basis that 23 if G4S retained the contract, Brook House would not be 24 over head count. The decision was financially 25 beneficial, as all savings increased the margin."</p> <p style="text-align: center;">Page 92</p>

23 (Pages 89 to 92)

<p>1 Can you help me understand this: do you know when</p> <p>2 approximately -- I know the bid process is quite long.</p> <p>3 A. Yes.</p> <p>4 Q. When was contract renewal coming up?</p> <p>5 A. So I think the renewal was in 2018.</p> <p>6 Q. Yes.</p> <p>7 A. So I think a lot of the bid work had been done or was</p> <p>8 being done. I wasn't massively involved in it. I was</p> <p>9 made aware that the new bid that we were being asked</p> <p>10 to -- or that we were bidding for and other people were</p> <p>11 bidding for was much -- the staffing levels were lower,</p> <p>12 the level of education and services to residents, such</p> <p>13 as welfare, was lower. So that's, I think, where a lot</p> <p>14 of the staffing savings were. So instead of welfare</p> <p>15 being opened seven days a week, it was only open five</p> <p>16 days a week, and that was the spec that was being bid</p> <p>17 on.</p> <p>18 So Ben said that he didn't want to recruit to our</p> <p>19 full sort of FTE -- full-time equivalent -- head count.</p> <p>20 I can't recall what the number was.</p> <p>21 Q. Sure.</p> <p>22 A. But he was content to run with vacancies to minimise</p> <p>23 that transition, should we win the contract.</p> <p>24 Q. And to show that costs were low at the time that the bid</p> <p>25 was being (overspeaking)?</p> <p style="text-align: center;">Page 93</p>	<p>1 Q. Yes.</p> <p>2 A. And that fluctuated based on head count. So if the head</p> <p>3 count in the centre was high, the number of hours that</p> <p>4 needed to be provided over a 24-hour were higher and if</p> <p>5 it was lower, it was lower. So, in effect, you could</p> <p>6 not have your full head count but still provide your</p> <p>7 contracted hours.</p> <p>8 Q. I see. And not reach the point at which you would incur</p> <p>9 a penalty?</p> <p>10 A. Yes.</p> <p>11 Q. This policy of running the staffing numbers lower in the</p> <p>12 run-up to the bid, is that an explicit policy by</p> <p>13 Ben Saunders or was it more of an unspoken kind of</p> <p>14 gradual plan?</p> <p>15 A. It was a discussion he had with me that said he wanted</p> <p>16 me to maintain the contracted hours, but that he wasn't</p> <p>17 going to recruit to the full head count.</p> <p>18 Q. Was the Home Office aware of that?</p> <p>19 A. I don't know.</p> <p>20 Q. Did you ever have a conversation with him in the</p> <p>21 presence of anyone from the Home Office about that?</p> <p>22 A. I don't recall that happening with the Home Office</p> <p>23 present.</p> <p>24 Q. You have said at 85 that this added unnecessary pressure</p> <p>25 to the staff and made the role more difficult?</p> <p style="text-align: center;">Page 95</p>
<p>1 A. I don't think showing costs were low would have</p> <p>2 benefited the bid --</p> <p>3 Q. Right, so --</p> <p>4 A. -- because it was a completely different spec. I think</p> <p>5 it just meant that we would have transitioned into the</p> <p>6 new contract with the right number of people as opposed</p> <p>7 to being --</p> <p>8 Q. Having it?</p> <p>9 A. -- 20 or 30 people over.</p> <p>10 Q. I see and then having a kind of steep drop-off?</p> <p>11 A. Then you would have had to -- through people resigning,</p> <p>12 you would have had to have lowered your numbers.</p> <p>13 Q. Can you help with the difference between the target</p> <p>14 number of staff and then the contractual requirement</p> <p>15 number of staff?</p> <p>16 A. Yes. So the contract was difficult in terms of managing</p> <p>17 staffing numbers. So there was a target number, as in</p> <p>18 a target number of full-time equivalent head count of</p> <p>19 officers and DCMs, or DOMs. The idea with that is that</p> <p>20 should have then provided you enough people when you</p> <p>21 build in your sickness and your leave and your</p> <p>22 non-effective rate. It should have provided you with</p> <p>23 enough staff to run the centre.</p> <p>24 Q. Yes.</p> <p>25 A. What we were managed on is a table of contracted hours.</p> <p style="text-align: center;">Page 94</p>	<p>1 A. Yes, of course it did. It's a minimum for a reason.</p> <p>2 Obviously, when the contract was written, the minimum</p> <p>3 is, you know, what you should be able to run the centre</p> <p>4 safely on. That's what's agreed as the minimum -- the</p> <p>5 MSL, I think it's referred to, minimum staffing level.</p> <p>6 Q. Minimum staffing level, yes.</p> <p>7 A. So that's agreed in the contract. But, obviously, if</p> <p>8 you are continually running at that, there should be</p> <p>9 days when, you know, you haven't got training on and you</p> <p>10 haven't got leave and you'll have over your MSL, which</p> <p>11 makes the place, obviously, a little bit easier to run</p> <p>12 and a better place to be in.</p> <p>13 Q. You said that running on that minimum for the majority</p> <p>14 of the time rather than as an exceptional, I suppose,</p> <p>15 led to the feeling of staffing being tight and "had we</p> <p>16 recruited more staff, there would have been many more</p> <p>17 days where we did not feel that we were scraping by"?</p> <p>18 A. Yes, very much my opinion.</p> <p>19 Q. Sure.</p> <p>20 A. But yes.</p> <p>21 Q. It is not because -- it is not solely because it was</p> <p>22 difficult to recruit people, from what you have told us,</p> <p>23 but, in fact, because there was a decision not to</p> <p>24 recruit people at that time?</p> <p>25 A. Yeah, it was difficult to recruit at the time, but also,</p> <p style="text-align: center;">Page 96</p>

24 (Pages 93 to 96)

<p>1 there was -- part of my remit was training and it was</p> <p>2 a frustration between Santi and I. I had many difficult</p> <p>3 conversations with Santi, who was my training officer,</p> <p>4 about providing initial training plans -- sorry, initial</p> <p>5 training courses, ITCs, where we would come up -- we'd</p> <p>6 be asked to come up with plans to provide a training</p> <p>7 course for 30, 40, 50 people. We would spend weeks</p> <p>8 planning that and identifying external venues and lots</p> <p>9 of other places to make sure resource-wise we could</p> <p>10 deliver, only to be told that we wouldn't be doing that</p> <p>11 anymore or to be told that, actually, an ITC where we</p> <p>12 were guaranteed 20 people turned up with six. So in</p> <p>13 terms of resource of running a training plan for -- or</p> <p>14 a training course for six people, it was quite</p> <p>15 demoralising for Santi sometimes.</p> <p>16 Q. Sure.</p> <p>17 A. So, yeah, there was a frustration there.</p> <p>18 Q. You would be told, you say, that you weren't doing it</p> <p>19 anymore so that the ITC had been cancelled and there was</p> <p>20 no-one being trained at that period?</p> <p>21 A. No, it would just be that I would -- knowing that we</p> <p>22 were -- you know, knowing that we needed to recruit</p> <p>23 numbers, I would make the offer to say, "I can run --</p> <p>24 you know, we can run you an ITC that's got 40 or 50</p> <p>25 people on it".</p> <p style="text-align: center;">Page 97</p>	<p>1 Q. Yes.</p> <p>2 A. Is two people enough to look after 120 residents on</p> <p>3 a wing at Brook House? I don't -- not to provide the</p> <p>4 adequate services that we want to. However, there's</p> <p>5 times when, actually, if all your support services on</p> <p>6 the outside -- welfare, activities, regime -- if all of</p> <p>7 that stuff is very well resourced, then actually it can</p> <p>8 be, because a lot of residents spend most of their time</p> <p>9 off of the units. But, you know, even if you doubled</p> <p>10 that to four, depending on what the ask is of</p> <p>11 the officer, is four enough people to look after 120</p> <p>12 people? So it's very subjective. So that's why I try</p> <p>13 to draw the difference between the two.</p> <p>14 Q. And what the meaning of "adequacy" is as you set out in</p> <p>15 your statement?</p> <p>16 A. Absolutely. You have your contract compliance, which is</p> <p>17 one, and the minimum number there was two per wing. But</p> <p>18 is that adequate? And that's a different question.</p> <p>19 Q. You say in your statement, well, more staff can't</p> <p>20 guarantee safety, because --</p> <p>21 A. No.</p> <p>22 Q. -- something can happen and it doesn't really matter if</p> <p>23 you have two or four staff. An unsafe event can happen?</p> <p>24 A. Yes.</p> <p>25 Q. But, of course, more staff can increase the level of</p> <p style="text-align: center;">Page 99</p>
<p>1 Q. In anticipation of it getting those (overspeaking)?</p> <p>2 A. In anticipation, looking at the numbers and the plan you</p> <p>3 can see that's the numbers you need, so we would go out</p> <p>4 and plan for that, and to be told we wouldn't be doing</p> <p>5 that anymore and you'd get 10 or 12 people through the</p> <p>6 door.</p> <p>7 Q. You understood that -- just to make sure I have</p> <p>8 understood your point -- to be a combination of</p> <p>9 recruitment itself being difficult but also a decision</p> <p>10 not to recruit to the normal staffing levels and keep it</p> <p>11 at a minimum?</p> <p>12 A. That's my understanding of it at the time, yes.</p> <p>13 Q. Thank you. That can come off the screen now. You cover</p> <p>14 staffing generally from paragraph 123, so this is</p> <p>15 page 29 of your statement, wherein you say:</p> <p>16 "Generally, staff were unhappy with staffing</p> <p>17 levels."</p> <p>18 You say it was in line with the contract, but you</p> <p>19 didn't feel that two people per wing was adequate. You</p> <p>20 say it should have been more like three DCOs per wing</p> <p>21 and one DCM and ideally six or seven staff.</p> <p>22 A. It's a really difficult number to formalise in your</p> <p>23 head. It's so opinionated about what people think is</p> <p>24 the right number and what people think is the wrong</p> <p>25 number.</p> <p style="text-align: center;">Page 98</p>	<p>1 safety, can't they?</p> <p>2 A. Absolutely, yes, it would definitely help.</p> <p>3 Q. Moving away just from safety, would you agree that more</p> <p>4 staffing improves the quality of life for detained</p> <p>5 persons because of stuff like activities being able to</p> <p>6 be run, people who want someone to talk to, having</p> <p>7 somebody they can talk to?</p> <p>8 A. It most certainly can do. You know, a lot of</p> <p>9 frustration for the residents is not getting answers</p> <p>10 quickly or not having questions answered. So if</p> <p>11 there's -- you know, and I've operated as an officer on</p> <p>12 a wing with two -- how much time can you afford one</p> <p>13 person if you are looking after 120 people? So it's</p> <p>14 difficult.</p> <p>15 Q. At 125, you say that "We talked about staffing levels</p> <p>16 amongst ourselves and the fact that two people on a wing</p> <p>17 made it difficult. Ultimately, it was part of</p> <p>18 the contract". Then you say, "We could manage with two</p> <p>19 people, but it limited our ability to assist residents".</p> <p>20 You say you talked about staffing levels amongst</p> <p>21 yourselves, do you mean amongst the SMT, amongst you and</p> <p>22 people on the wings?</p> <p>23 A. I think everyone, you know, staffing levels is quite</p> <p>24 a hot topic whenever you are discussing it. So I think</p> <p>25 I was referring to the fact we probably spoke about it</p> <p style="text-align: center;">Page 100</p>

25 (Pages 97 to 100)

<p>1 as an SMT, we definitely did, but also we would have</p> <p>2 spoken about it with DOMs and with officers as well.</p> <p>3 Q. And with Home Office?</p> <p>4 A. And with the Home Office, yes.</p> <p>5 Q. And did they, in general, share the same sorts of</p> <p>6 thoughts as you about low staffing and its impact?</p> <p>7 A. Yeah, I think they did share the same views.</p> <p>8 Q. Turning to page 7 of your statement, paragraph 24, you</p> <p>9 say:</p> <p>10 "In my opinion, during the relevant period, the SMT</p> <p>11 were not a united team and the leadership from the</p> <p>12 director [Ben Saunders] at the time was not very strong.</p> <p>13 I raised compliance issues with him on numerous</p> <p>14 occasions and asked him to arrange a meeting to discuss</p> <p>15 action plans. When he attended such meetings he was</p> <p>16 shouted down by the SMT and little was done."</p> <p>17 A. Yes.</p> <p>18 Q. Do you remember which compliance issues you raised?</p> <p>19 A. So we had a number of action plans at the time and, you</p> <p>20 know, still do now, referred to as CAPs or consolidated</p> <p>21 action plans. We would have one for internal</p> <p>22 recommendations from our own auditing and one for</p> <p>23 external recommendations for HMIP and IMB and</p> <p>24 Home Office input. So part of my role was to manage</p> <p>25 those and to manage the progress and to compile evidence</p> <p style="text-align: center;">Page 101</p>	<p>1 I don't -- yeah, I'm not too sure what the resilience</p> <p>2 was. I think there was a resilience to accept failure</p> <p>3 in your own function at times, which is what I sort of</p> <p>4 alluded to in my statement.</p> <p>5 Q. Amongst any particular teams or in general across the</p> <p>6 board?</p> <p>7 A. I think some functional heads were probably more engaged</p> <p>8 with it than others. There were specific people that</p> <p>9 were very defensive, I think, in their stance and their</p> <p>10 take towards issues being raised.</p> <p>11 Q. Who?</p> <p>12 A. So Michelle Brown was particularly defensive. She would</p> <p>13 quite often, if you raised an issue -- and that -- you</p> <p>14 know, you're raising an issue from a good place, to say,</p> <p>15 "I've noticed this, just to let you know. It's your</p> <p>16 function. Could you have a look?". Quite often that</p> <p>17 would be turned around and directed back at you and, you</p> <p>18 know, another failing in your area would be brought up</p> <p>19 or, you know, "You shouldn't be raising this because</p> <p>20 you're not doing this in your area", so you had that</p> <p>21 sort of mentality. Neil Davies did similar things.</p> <p>22 I think, generally, most people were defensive, but</p> <p>23 I got a feeling that some were not being -- so people</p> <p>24 like Stacie Dean was very good and very engaged, but</p> <p>25 I think she was defensive just because of</p> <p style="text-align: center;">Page 103</p>
<p>1 in order to look at signing those actions off as</p> <p>2 compliant.</p> <p>3 So monthly, Barry would send out an email to</p> <p>4 functional heads and to other managers to say, "Can we</p> <p>5 have an update on your CAP actions?" And rarely would</p> <p>6 he get a response back. So I raised it with Ben and</p> <p>7 said, "Look, is there a way that" -- you know, I'm</p> <p>8 trying to push this, but obviously I'm a level below</p> <p>9 some of these managers, so in terms of having some of</p> <p>10 those conversations it's difficult, "Can you raise it?</p> <p>11 Can you and me have a meeting with each functional head,</p> <p>12 all of the functional heads together?" He agreed it</p> <p>13 would be a good idea. He said he would raise it in the</p> <p>14 next SMT and we would, moving forward, have a meeting</p> <p>15 between myself, Ben and the functional head and we would</p> <p>16 go through the consolidated action plan. I wasn't at</p> <p>17 the next SMT meeting. But from what was fed back to me,</p> <p>18 Ben raised it and the other functional heads said that</p> <p>19 they wouldn't be doing that, as in shouted him down, and</p> <p>20 it died a death there.</p> <p>21 Q. Do you understand what the nature of the resistance to</p> <p>22 following through the action plans was?</p> <p>23 A. I'm not too sure. I don't know -- you know, I don't</p> <p>24 know if it was people protecting their workload, I don't</p> <p>25 know if it was that people didn't see any benefit in it.</p> <p style="text-align: center;">Page 102</p>	<p>1 the atmosphere, as opposed to trying to be difficult.</p> <p>2 Q. So you knew then, as a result of the times you raised</p> <p>3 it, you say numerous times, that the action plans</p> <p>4 weren't being followed through in the way that, in your</p> <p>5 view, they should have been?</p> <p>6 A. Mmm.</p> <p>7 Q. And you didn't get the highest-level, I suppose, support</p> <p>8 from Ben Saunders to ensure that any resistance was</p> <p>9 overcome?</p> <p>10 A. Yes.</p> <p>11 Q. Did you ever consider going above Mr Saunders to say,</p> <p>12 "Look, HMIP have said we need to do these things and</p> <p>13 it's just not going to happen"?</p> <p>14 A. The -- from what I can recall, action plan progress was</p> <p>15 reported to the trading review as part of the monthly</p> <p>16 submission, so it was shared higher within G4S.</p> <p>17 Q. So you think that G4S, at some level, through the</p> <p>18 mechanism of the trading review, would have known that</p> <p>19 these sorts of things weren't being followed up?</p> <p>20 A. Yes, I believe so. They scrutinised those submissions</p> <p>21 in great detail.</p> <p>22 Q. You didn't, otherwise, take any steps to tell anyone</p> <p>23 else, "I have been trying to do this" and it is not</p> <p>24 (overspeaking)?</p> <p>25 A. I didn't raise it above Ben's head, no.</p> <p style="text-align: center;">Page 104</p>

26 (Pages 101 to 104)

<p>1 Q. I want to ask about a specific incident on 13 May 2017</p> <p>2 involving D687. We have heard about this, both in</p> <p>3 phase 1 at the end of last year and during this phase.</p> <p>4 We have seen footage as well. I asked Mr Farrell about</p> <p>5 this last week. Mr Collier, who has also provided an</p> <p>6 expert report to the inquiry, has commented on it. So</p> <p>7 D687 had been in immigration detention since March 2015</p> <p>8 and he had been in Brook House since October that year.</p> <p>9 He spoke on the footage, as we have seen, and in his</p> <p>10 statement, of having lost his brother and not being</p> <p>11 allowed to go to the funeral and he was due on this date</p> <p>12 we are going to look at to be moved to the Verne, which</p> <p>13 is quite far away from his family.</p> <p>14 A. Yes.</p> <p>15 Q. He went to the toilet and cut off his T-shirt. Do you</p> <p>16 recall the incident?</p> <p>17 A. Yes, I do recall the incident, yes.</p> <p>18 Q. Can we look at the use of force documentation, then,</p> <p>19 please, <CJS005652>. So this is the front page. We can</p> <p>20 see your name there. Just to clear up any confusion</p> <p>21 here, the things that are crossed out, we should ignore;</p> <p>22 is that right? So handcuffs used --</p> <p>23 A. That is generally the way they would be written, yeah.</p> <p>24 Q. So "Yes" means handcuffs were used and "Camera Used:</p> <p>25 No". The reason given, which is at the bottom of</p> <p style="text-align: center;">Page 105</p>	<p>1 options?</p> <p>2 A. Yes.</p> <p>3 Q. But, in fact, it wasn't used, was it?</p> <p>4 A. No, and, I mean, I've said in my statement there's</p> <p>5 a number of errors I made in completing this report and</p> <p>6 I completely hold my hands up to them. I can't comment</p> <p>7 now as to why I made them. They weren't a deliberate</p> <p>8 error. I think, in terms of body-worn camera, I think</p> <p>9 Chris had one.</p> <p>10 Q. Yes. Mr Farrell --</p> <p>11 A. I think I made an assumption without checking with them</p> <p>12 that they'd turned theirs on, and they hadn't, which is</p> <p>13 why, when I was writing that report, I ticked "Yes". So</p> <p>14 there is a number of errors in there that I made, but</p> <p>15 they weren't sort of deliberate errors at the time.</p> <p>16 Q. Mr Farrell, I asked, and he looked at the video footage</p> <p>17 and he recognises he was wearing one as well. He</p> <p>18 thinks, or maybe I suggested, that when you have it on</p> <p>19 there's a red light, and that there is no light on?</p> <p>20 A. Generally, yes, it makes a beep and there is a light.</p> <p>21 Q. There is no light on and we obviously don't have any</p> <p>22 footage other than Mr Tulley's undercover footage?</p> <p>23 A. Yes.</p> <p>24 Q. Page 8, just to set out the background of the event,</p> <p>25 this is some background by you which says that you were</p> <p style="text-align: center;">Page 107</p>
<p>1 the page, is a reason for use of force is "To facilitate</p> <p>2 transfer/prevent self-harm". That's what "S/H" means,</p> <p>3 isn't it?</p> <p>4 A. Yes.</p> <p>5 Q. It is noted there to be unplanned.</p> <p>6 A. Yes.</p> <p>7 Q. And he was on an ACDT. Would you have known before the</p> <p>8 incident that he was on an ACDT?</p> <p>9 A. I don't recall remembering now whether I knew he was on</p> <p>10 an ACDT or not. I would have -- on the day, I should</p> <p>11 have been aware because it would have been on the sort</p> <p>12 of daily handover and spec. So if I was DD, which I was</p> <p>13 on the day, I would have known who was ACDT, who wasn't.</p> <p>14 So on the day, I would assume I would have known.</p> <p>15 Q. It says, yes, he was seen by healthcare after the use of</p> <p>16 force. If we go to page 4, it is confirmed there --</p> <p>17 there is your name, and the reason again given is</p> <p>18 "preventing self-harm". To the following page, please:</p> <p>19 "Was a member of healthcare present throughout the</p> <p>20 incident ... no."</p> <p>21 And injuries, "Did the detainee sustain any</p> <p>22 injuries", again, "No" is ticked and he didn't require</p> <p>23 hospitalisation. Next page, please:</p> <p>24 "Was body-worn camera used?"</p> <p>25 "Yes" is ticked. That's the bottom of those four</p> <p style="text-align: center;">Page 106</p>	<p>1 duty director that day.</p> <p>2 A. Yes.</p> <p>3 Q. It was your second duty director day out of three. You</p> <p>4 say that a suitable crew had been arranged. Third from</p> <p>5 the bottom paragraph:</p> <p>6 "There were concerns that he would not comply."</p> <p>7 But he did compliantly walk to the discharge waiting</p> <p>8 room?</p> <p>9 A. Yes.</p> <p>10 Q. You got a call from Chris Donnelly saying he'd tied</p> <p>11 something around his neck. At the bottom of the page</p> <p>12 there, you went to the area, didn't enter, but you did</p> <p>13 look into the room and you saw there D687 with a T-shirt</p> <p>14 around his neck.</p> <p>15 Going to page 9, commenting on the ligature, you</p> <p>16 talk about where it was attached to the kind of mobility</p> <p>17 handle and you say, just by the first redaction there:</p> <p>18 "Should D687 have dropped, the knot would have been</p> <p>19 free to move to the lowest part of the handrail and</p> <p>20 would not have applied pressure."</p> <p>21 What's the relevance of that?</p> <p>22 A. So that was -- I mean, it was part of my assessment and</p> <p>23 my decision making at the time, so I know obviously</p> <p>24 later in Collier's report he suggests that, you know,</p> <p>25 I used a lighter to close the gap and to initiate force.</p> <p style="text-align: center;">Page 108</p>

27 (Pages 105 to 108)

<p>1 Part of my assessment at the time was that ligature and 2 whether it was removable, as opposed to initiating 3 force. 4 My intention throughout all of that was to remove 5 that ligature, because by removing the ligature from the 6 rail, it neutralised the incident and the situation. 7 So, at the time, I was acting in what I thought was the 8 best interest of everyone involved to try and bring it 9 to a very quick and swift end, so my intention when 10 I closed the gap was to secure that ligature that was on 11 the rail. 12 The reason I mention it in there is because it's 13 part of my thought process and part of my risk 14 assessment at the time. That's why I've put it in 15 there. I appreciate what Collier says in his report, 16 and, yes, I could have dealt with it differently. 17 I could have walked away. I could have planned it. His 18 report suggests that that's without risk and, you know, 19 that has its own risks with it. That would have 20 prolonged the incident by half an hour, 40 minutes, for 21 us to get more officers present. It would have -- you 22 know, we would have had to have entered that area with 23 a team in PPE, which would have identified what was 24 going to happen. So there was a number of different -- 25 a number of different things going on in my mind when</p> <p style="text-align: center;">Page 109</p>	<p>1 the best interests of everyone there to sort of bring 2 that to a quick and safe resolution by securing that 3 ligature. 4 Q. The other officers had to act, to a certain extent, on 5 instinct, didn't they? 6 A. Yes. Yes, they did. 7 Q. They thought, "We need to restrain this person"? 8 A. Yes. 9 Q. But your intention hadn't been to restrain him; it had 10 just been to remove the ligature? 11 A. Yes. 12 Q. You say that waiting longer -- you accept that 13 Mr Collier says that escalation hadn't reached its kind 14 of ultimate point of "it is not going to get any 15 better". You waiting longer could have prolonged the 16 risk, and it comes with risks, you say? 17 A. Yes. 18 Q. Would you accept that, given that you say that, if he'd 19 have dropped from the toilet, the knot would not have 20 strangled him, effectively, that actually the risk 21 level was relatively low at the time? 22 A. The risk was still relatively low. It might not have 23 strangled him. I couldn't be 100 per cent sure. Hence 24 why when I had the opportunity to secure it and remove 25 that risk, I did. Who is to know what would have</p> <p style="text-align: center;">Page 111</p>
<p>1 I was making that decision. 2 I know it says that my intent was to initiate force. 3 I didn't -- you know, the footage shows that I made -- 4 you know, my direction was towards the ligature. 5 I didn't make initial contact with the resident. 6 I secured the ligature. That was always my intention. 7 Had I intended to use force, as per the manual, 8 I would have secured his head. That would have been the 9 first thing that I would have looked to secure. It 10 wasn't. I looked to remove the ligature, which I did; 11 so quite quickly, and then the restraint took place. 12 Q. So the restraint took place moments after you took 13 contact with the ligature. 14 A. Yes. 15 Q. That's because the rest of the team didn't know what was 16 going to happen, did they? 17 A. And that's -- you know, that's part of my fault, and 18 that's part of my reflection and that's part of what 19 I've sort of said in my statement. I could have dealt 20 with it differently. I appreciate that my actions put 21 the other guys there in a situation where they had to 22 react to what I was doing, and they were unaware of 23 that. So I take that on board, definitely. 24 Would I do things differently now? Quite possibly, 25 yes, I would. At the time, I thought I was acting in</p> <p style="text-align: center;">Page 110</p>	<p>1 happened if he'd dropped. He could have banged his head 2 on the toilet bowl and suffered a severe head injury. 3 I don't know. So ... 4 Q. You'd also accept that there's risks of instigating an 5 act which you say you didn't intend to turn into 6 a restraint, but there was some possibility that it 7 could have done because no-one knew -- 8 A. Yes. 9 Q. -- that holds its own risks, doesn't it? 10 A. Yes, of course it does, yes. 11 Q. He could bang his head in the course of the restraint? 12 A. Yes. Yes, it does. 13 Q. And having the ligature around his neck -- removed, as 14 you say, from the kind of handrail, but still one part 15 of it around his neck -- while being restrained, that 16 holds a risk, doesn't it? 17 A. Yes. Everything we do holds a risk. 18 Q. And the risk of taking that action is, maybe in 19 hindsight, greater than the risk of waiting? 20 A. Yes, and, you know, you can do that with reflection. 21 I was in a situation. I arrived. I made an assessment. 22 Like I said, I thought I was acting in the best 23 interests. At the time, it wasn't my intent, you know, 24 to heighten risk. I was aware that they'd been engaging 25 with him for quite a period of time.</p> <p style="text-align: center;">Page 112</p>

28 (Pages 109 to 112)

<p>1 You know, the assessment was that continued 2 engagement was unlikely to de-escalate that incident 3 because the trigger for that incident was the removal, 4 was the transfer to another centre. So all the time 5 that that was still a possibility, it was very unlikely 6 that that situation was going to de-escalate. 7 Q. If you had waited, it would have been possible to get 8 healthcare to attend, wouldn't it? 9 A. Yeah, and I -- you know, that's part of the things 10 I accept. You know, if I had waited and we had planned 11 it, you know, it would have been -- you know, there 12 would have been someone recording it and healthcare 13 would have been present, yes. 14 Q. I appreciate you draw the distinction between planning 15 it -- you have to go away, you have to do a brief, you 16 have to wear PPE, and you said why that might not have 17 been appropriate. But is it possible that you could 18 have just called healthcare anyway? 19 A. Yes, it is, it is, and, again, that's part of my 20 reflection. Healthcare probably should have been there 21 before I got there. I should have taken a more 22 strategic view. I didn't, at the time. I got involved 23 in a situation which obviously Collier suggests and 24 that's -- you know, that's the learning that I've taken 25 away, definitely, is that I would step back and assess</p> <p style="text-align: right;">Page 113</p>	<p>1 A. Force was used, but, in that report, I don't say that 2 I did use force. 3 Q. But your team used force? 4 A. The team used force, yes. 5 Q. And they didn't know what your intention was? 6 A. No. 7 Q. Do you think it would have been more accurate to say in 8 this form, "I didn't -- I was planning to remove the 9 ligature". 10 A. Yes. 11 Q. "My team saw this as the instigation of use of force"? 12 A. Yes. 13 Q. And to say within this form, which is meant to include 14 in it the rationale for using force, "In fact, there was 15 no rationale for using force, because that was never my 16 intention"? 17 A. Yes, and, looking back, you're right, I could have put 18 that in there, and that would have given a better 19 overview of the report. 20 Q. It would have been an accurate interpretation of what 21 happened, wouldn't it? 22 A. It would have been more accurate, yes. I didn't put in 23 there my thought process at the time. 24 Q. So -- 25 A. Or all of it.</p> <p style="text-align: right;">Page 115</p>
<p>1 that situation slightly differently this time around. 2 Q. Would you accept that the relevance of healthcare being 3 there is not just because he's potentially going to be 4 physically harmed, but also because he's potentially 5 mentally unwell? 6 A. Absolutely, yes. Absolutely. 7 Q. So you heard him say things like, "I want to die. 8 I want to go away in a body bag"? 9 A. I can't remember whether I was there or not when he 10 was sort of -- some of the things he was saying when 11 I was there. He made it very clear he didn't want to 12 leave, and you could see -- I could see he was upset. 13 Q. Distressed? 14 A. Yes. 15 Q. And you say you would have known, although obviously you 16 can't remember now, that he was on an ACDT, because it 17 would have been in the handover? 18 A. Mmm. 19 Q. So you have commented on the inquiry's expert's findings 20 there. When you filled in your use of force form, which 21 we just looked at, and which has just disappeared from 22 the screen, you didn't say in that use of force form 23 that it was never your intention to use force, did you? 24 A. Well, I also don't say that I did use force. 25 Q. Force was used?</p> <p style="text-align: right;">Page 114</p>	<p>1 Q. -- your team, who we have heard from some of, their view 2 was that the rationale for use of force was to prevent 3 injury and then later to remove him and, in fact, what 4 we are hearing is, there was no intention at all to use 5 force? 6 A. It wasn't my intention to use force, no. 7 Q. Should this have been recorded as an event of use of 8 force outwith the use of force requirements; so not as 9 a last resort, because force is used without any 10 rationale? 11 A. Well, there's -- I mean, there's still a rationale there 12 to use force because -- 13 Q. What's the rationale to use force? 14 A. One, there's a ligature present that poses a risk, and 15 I had an opportunity to sterilise that; two, there is 16 still an enforced transfer to take place. I'm not sure 17 why the transfer was taking place at the time. 18 A suitable crew transfer suggests that -- well, it is 19 the fact that the Home Office have decided that that 20 person needs to transfer, and if they refuse then we are 21 to use force to remove them and hand them over to that 22 escort team. So there was still a valid reason to move 23 him from that room and hand him over to the escort team. 24 Q. That's a retrospective justification, though, isn't it? 25 That's not the reason that force was used on him at the</p> <p style="text-align: right;">Page 116</p>

29 (Pages 113 to 116)

<p>1 time that force was used on him?</p> <p>2 A. I mean, I don't -- I don't know overly what you want me</p> <p>3 to say in that. You know, I've set out what it was</p> <p>4 that -- you know, my thought process at the time and my</p> <p>5 thinking at the time. Yeah. There was a number of --</p> <p>6 like I said, there was a number of different</p> <p>7 considerations to make. We had to deliver him to the</p> <p>8 escorting team for him to transfer. That was an</p> <p>9 instruction from the Home Office. So we -- if I'd gone</p> <p>10 away and planned that use of force and come back, the</p> <p>11 use of force would still have taken place to have handed</p> <p>12 him over to that escort team, potentially, if he was</p> <p>13 still refusing to come out of the room.</p> <p>14 Q. Potentially, yes.</p> <p>15 A. So, yeah, that was the ...</p> <p>16 Q. But the actual use of force happened because there was</p> <p>17 confusion among the team of what your movement towards</p> <p>18 him meant?</p> <p>19 A. Yes.</p> <p>20 MS MOORE: Chair, I have just realised, it is 1.01 pm. It</p> <p>21 might be now a good time for a break. If we come back</p> <p>22 at 2.00 pm and continue with the evidence of</p> <p>23 Mr Haughton.</p> <p>24 THE CHAIR: Thank you very much. Thank you, Mr Haughton.</p> <p>25 (1.02 pm)</p> <p style="text-align: center;">Page 117</p>	<p>1 "Authority for initial 24 hours RFA** (Cases of</p> <p>2 Urgency).</p> <p>3 "Person authorising RFA ... S Dix."</p> <p>4 And it gives the date and the time. So he</p> <p>5 authorised the removal from association. As we have</p> <p>6 seen, you are informed of it. What do you do when</p> <p>7 you're informed of the use of rule 40?</p> <p>8 A. It depends on the situation. Normally, we just discuss</p> <p>9 what's happened. We discuss the reporting elements,</p> <p>10 make sure, you know, everyone is all right, look after</p> <p>11 the welfare of the resident and the members of staff.</p> <p>12 We just talk through the incident, really.</p> <p>13 Q. Do you see this rationale as written here, or is that</p> <p>14 written after you're --</p> <p>15 A. It's generally -- it's not always shared with us before</p> <p>16 they go on to rule 40, no.</p> <p>17 Q. But you have a discussion, do you, before you -- at the</p> <p>18 time of you being told about it, so we saw 8 o'clock in</p> <p>19 this incident. Is that when you would have had the</p> <p>20 discussion?</p> <p>21 A. Yes, so that's when I would have been told what had</p> <p>22 happened in the lead-up and what's happened as a result.</p> <p>23 Q. Do you have to take any action or are you just informed?</p> <p>24 A. No, we are just informed.</p> <p>25 Q. Your statement says at 263 that you expect that D1527's</p> <p style="text-align: center;">Page 119</p>
<p>1 (The short adjournment)</p> <p>2 (2.00 pm)</p> <p>3 MS MOORE: We continue with the evidence of Mr Haughton.</p> <p>4 Mr Haughton, you were asked to comment in your</p> <p>5 statement about a different event -- this is involving</p> <p>6 D1527 -- and you discuss this at page 59 of your witness</p> <p>7 statement at paragraphs 263 and 264, quite briefly.</p> <p>8 This event relates to what happened on 4 May 2017, so</p> <p>9 D1527 had jumped onto the D wing netting. We have seen</p> <p>10 footage of this previously in the inquiry. He was then</p> <p>11 persuaded to come off the netting. He went to sit with</p> <p>12 two other detainees and, in due course, a rule 40 was</p> <p>13 authorised. Can we have a look on the screen at</p> <p>14 <HOM000251>, please. This is the DCF1 form in relation</p> <p>15 to that. We can see from page 1, it is "Search</p> <p>16 conducted on arrival", et cetera, all of those</p> <p>17 signatures are "S Dix", that's Mr Steve Dix.</p> <p>18 A. Yes.</p> <p>19 Q. We see you were notified of the use of rule 40 by</p> <p>20 DCM Steve Dix at 20 o'clock, so 8 pm. So were the other</p> <p>21 people, so that's you there, "D Haughton", being</p> <p>22 notified, and at the bottom of page 2, we see the record</p> <p>23 of the reasons for removal from association there. It</p> <p>24 says "Duty director, [plus] Home Office, IMB and</p> <p>25 healthcare are aware":</p> <p style="text-align: center;">Page 118</p>	<p>1 removal from association and constant supervision was</p> <p>2 due to behaviour. Is that a permissible reason to</p> <p>3 invoke the powers under rule 40?</p> <p>4 A. When I had -- when I wrote my statement, I didn't have</p> <p>5 access to this.</p> <p>6 Q. I see.</p> <p>7 A. I had access to one page of an observation of a rule 40</p> <p>8 document, so I had absolutely no idea about the incident</p> <p>9 when I wrote my statement.</p> <p>10 Q. Yes. I think you did say in your statement that you</p> <p>11 couldn't remember it, so you were guessing on the basis</p> <p>12 of (overspeaking)?</p> <p>13 A. Yes, obviously, seeing the document now, then yes. That</p> <p>14 behaviour is potentially disruptive, potentially causes</p> <p>15 a risk to the centre and to the others in it, so it</p> <p>16 would appear rule 40 is justified.</p> <p>17 Q. Is rule 40 justified with behaviour that's potentially</p> <p>18 disruptive, full stop?</p> <p>19 A. It very much depends on the behaviour. It should be</p> <p>20 a last resort if that behaviour cannot be de-escalated</p> <p>21 or if there's a potential risk of ongoing disruption to</p> <p>22 the regime or to the residents or if behaviour causes,</p> <p>23 you know, a safety concern. So, yes, you should always</p> <p>24 try and de-escalate and try and find a way -- an</p> <p>25 alternative to rule 40, but if you can't, then ...</p> <p style="text-align: center;">Page 120</p>

30 (Pages 117 to 120)

<p>1 Q. That could include if, as a last resort, you can't do 2 anything else about the disruption to the regime and the 3 residents, you say?</p> <p>4 A. Yes.</p> <p>5 Q. Where did you gain that understanding of the parameters 6 of rule 40?</p> <p>7 A. Just, you know, in general knowledge of sort of 8 conducting the role. We needed to sort of upskill 9 ourselves slightly in it. But there was no -- I had no 10 formal training when I moved into the role of DD on the 11 sort of use of rule 40.</p> <p>12 Q. Just to check there on the form, Steve Dix, we have 13 heard from him already. We know he was a DCM at this 14 point, wasn't he?</p> <p>15 A. Mmm.</p> <p>16 Q. Were DCMs entitled to authorise rule 40 per your 17 understanding?</p> <p>18 A. That was the standard working practice, yes.</p> <p>19 Q. In any circumstances or in some circumstances?</p> <p>20 A. So generally rule 40 is invoked in two different ways. 21 It's either a planned incident, where, for instance, 22 a resident might be leaving on overseas removals the 23 next day and there's the potential for disruption, so 24 authority will be sought. So for any planned use of 25 rule 40, a case is put to the Home Office and the</p> <p style="text-align: right;">Page 121</p>	<p>1 looked at to be an example of section 42?</p> <p>2 A. Yes.</p> <p>3 Q. The manager of a contracted-out detention centre, did 4 you understand Mr Dix to be the manager for the purposes 5 of this rule?</p> <p>6 A. Yes, for working purposes, it's always -- as far as 7 I can recall back in history, it's always been the case 8 that a DCM or a DOM or a team leader had the authority 9 to do that.</p> <p>10 Q. That was what you were told when you took on the role, 11 not in a training way, but you were told --</p> <p>12 A. Yeah, it was part of -- you know, I was a DCM or a team 13 leader before doing the role I did then and it was -- 14 you know, I signed people up for urgent rule 40 at the 15 time. It was sort of -- yeah, that's just what we did.</p> <p>16 Q. Fine. If we go to page 7, please, this is the first bit 17 of the rule I just quoted. Under paragraph 9 -- again, 18 it's rule 40:</p> <p>19 "40(1) where it appears necessary in the interests 20 of security or safety that a detained person should not 21 associate with other detained persons, either generally 22 or for particular purposes ..."</p> <p>23 Then it goes on to say the Secretary of State's 24 powers. So when it is necessary for security or safety, 25 that doesn't include, does it, when it is necessary to</p> <p style="text-align: right;">Page 123</p>
<p>1 Home Office will approve that use of rule 40.</p> <p>2 Generally, when a DCM or DOM is making that 3 decision, it's based on the fact that they're in the 4 middle of managing an incident. So, you know, the 5 ability is not there to go away and seek planned use of 6 rule 40.</p> <p>7 Q. I wonder if we could have on the screen <CJS000676>. 8 This is the DSO that pertains to rules 40 and 42. I'm 9 just going to ask you to look at the rule rather than 10 the DSO. But it is just a document that contains it. 11 I want to look at paragraph 28, which I think is on 12 page 10 -- sorry, 11. Thank you. It just sets out 13 rule 40 there. It says at the top:</p> <p>14 "... the Secretary of State ... may arrange for the 15 detained person's removal ..."</p> <p>16 That's, as you say, when you have time to go to the 17 Home Office. Then 42:</p> <p>18 "In cases of urgency ..."</p> <p>19 Which is the wording we see on the form:</p> <p>20 "... the manager of a contracted-out detention 21 centre may assume the responsibility of 22 the Secretary of State under paragraph (1) but shall 23 notify the Secretary of State as soon as possible after 24 making the necessary arrangements."</p> <p>25 Did you understand that to be -- this example we</p> <p style="text-align: right;">Page 122</p>	<p>1 avoid disruption to the regime?</p> <p>2 A. Significant disruption to regime would have 3 a significant impact on safety in the centre.</p> <p>4 Q. Does disruption to the regime always engage the 5 necessity of the interests of security or safety being 6 protected?</p> <p>7 A. Not always, no.</p> <p>8 Q. Do you think, or from your memory, when rule 40 was 9 used, was it always necessary in the interests of 10 security or safety or was it sometimes just to avoid 11 disruption?</p> <p>12 A. From memory, I would say it was around security. No, 13 I'm not -- again, it's a -- I suppose, yeah, it's 14 a definition, maybe, or an interpretation of what you 15 think that wording might mean.</p> <p>16 Q. I know that you weren't the person who authorised the 17 rule 40, but just because we were looking at it --</p> <p>18 A. Yeah, I know.</p> <p>19 Q. -- as an example in relation to 1527, Mr Dix was the one 20 who authorised it, but 1527 had come off the netting and 21 was sitting in a room with two other people at the time. 22 Did you consider it still was a disruption to the level 23 of making it necessary to secure the security and safety 24 of the centre?</p> <p>25 A. I wasn't there at the time.</p> <p style="text-align: right;">Page 124</p>

31 (Pages 121 to 124)

<p>1 Q. Do you think that that would fulfil your understanding 2 of what disruption means, for the purposes of this rule? 3 A. I can't make an assessment on whether it was -- because 4 I wasn't there at the time. The DCMs that attended that 5 and managed that incident made a decision based on their 6 assessment. I can't make a comment on what their 7 assessment was or wasn't. 8 Q. But you'd agree, I think, as you have suggested, maybe, 9 it needs to be more than just disruption? 10 A. It's whether it -- you know, yes, it depends, you know. 11 Was there a belief that he could have gone back onto the 12 netting? Was there a belief that there could have been, 13 you know, other issues? I don't know. You know, it's 14 very much done on a risk assessment at the time. 15 Q. Mr Dix, in his evidence to the inquiry, on 9 March 2022, 16 alluded to a procedure at the time about -- so 2017 -- 17 where, if someone was on the netting, the procedure was 18 for them to go on rule 40. He wasn't sure if that was 19 the policy, but he said that, due to the level of 20 disruption of him being on the netting, people do 21 generally go on rule 40, or he said E wing or CSU. Do 22 you remember that being the general kind of way things 23 went? 24 A. I don't remember at the time -- in that specific 25 incident. What I can say now is that it's very much not</p> <p style="text-align: center;">Page 125</p>	<p>1 have authorised a full search, to make sure that, where 2 possible, we could reduce the risk of that person using 3 that sort of item to hurt themselves. 4 Q. Do you know what information you'd have before you are 5 making that decision? So is it a conversation? Do you 6 look at written records? 7 A. Again, it depends on the situation. If you are in the 8 centre, you've got access to written records and to the 9 sort of database system, so you can go back and look at 10 history. If it's on the phone and you're on call, you 11 wouldn't necessarily have access to all of that data. 12 It might be that you have to make a decision based on 13 what you've got, the information you've got to hand, and 14 not historical stuff. You generally would -- 15 I generally would have expected the DCM to give me a bit 16 of a background on the history of the person. 17 Q. Help me with the -- in the centre versus on the phone. 18 Is that because, as DD, you might be at one of the other 19 centres, even though you're the DD who is in charge? 20 A. Well, no, it might be at 2 o'clock in the morning. 21 Q. So it's not always that, when you're the DD, you're 22 there personally? 23 A. No. 24 Q. Okay. 25 A. No, so if you're duty director, you're on site for</p> <p style="text-align: center;">Page 127</p>
<p>1 the case that it's a default move, that someone goes on 2 the netting and then they instantly go onto rule 40. 3 I've been duty director on call on numerous times when 4 people have got onto the netting and not gone onto 5 rule 40, so it is very much situation based. 6 Q. And you don't remember about 2017, whether that was more 7 common for people to go on rule 40 after going onto the 8 netting? 9 A. I can't recall -- it was quite frequent, from what I can 10 recall, of people going onto the netting. I can't say 11 whether all of them went onto rule 40, whether some did. 12 Q. Finally on this, you authorised a strip search which you 13 discuss in your statement. Can you just help us with -- 14 again, I understand you can't remember the details of 15 the exact assessment you made, but at the time, in what 16 circumstances would you be able to authorise a strip 17 search? 18 A. So a full search is, you know, we would authorise that 19 based on if there's -- again, it's risk based. So it's 20 very much dependent on what's been reported to you at 21 the time, when someone is seeking your authorisation. 22 In relation to this incident, it would appear that there 23 was a significant concern that the person had something 24 about their person that they could have used to cause 25 harm to themselves, so in that instance, yes, I would</p> <p style="text-align: center;">Page 126</p>	<p>1 a period of the day, but then you'd be on call at home. 2 Q. And there is no other duty director there? You're the 3 duty director and you're on call? 4 A. Yes. 5 Q. Fine. In this circumstance, the full use of force forms 6 that we have been through in some detail with the people 7 who were present -- and I appreciate that's not one of 8 you -- have different accounts, so some suggest that 9 there was an unknown object and some suggest quite 10 clearly it was a phone battery that had been removed at 11 the time, and so there was nothing on his person because 12 the phone battery was on the floor and, indeed, 13 I understand nothing was found after the full search. 14 Would you have looked at the sort of documents like 15 that, so the use of force accounts of the people who saw 16 him at the time when he was holding the object? 17 A. What, at the point of making the decision on the full 18 search? 19 Q. Yes. 20 A. Generally, the reports aren't written at that point. 21 I don't know when the full search took place. 22 Q. Yes. 23 A. You know, you're asked afterwards and, no, so you won't 24 always have those reports. 25 Q. So you go with the sometimes verbal account of normally</p> <p style="text-align: center;">Page 128</p>

32 (Pages 125 to 128)

<p>1 the person who is asking you, so Mr Dix in this --</p> <p>2 A. Yeah, so they will ring you for authorisation and they</p> <p>3 will give you an account and ask for your authorisation,</p> <p>4 and if you're not content that there's enough</p> <p>5 information in there, then you can -- you know, you can</p> <p>6 obviously turn around and say, "I don't want to</p> <p>7 authorise it" or, "You need to come away and give me</p> <p>8 some more information that would allow me to justify</p> <p>9 that".</p> <p>10 Q. Thank you. A question I should have asked earlier, when</p> <p>11 I was asking you about the last event, so when you</p> <p>12 mentioned PPE being used --</p> <p>13 A. Yes.</p> <p>14 Q. -- and the need to get kind of dressed up in PPE. It is</p> <p>15 another question about policy and what practice was. So</p> <p>16 I asked you about the netting and whether it was policy</p> <p>17 to put people on rule 40 after that. I should have also</p> <p>18 asked you, was it policy at the time that every time you</p> <p>19 did a planned use of force, you had to use full PPE?</p> <p>20 A. That was the working practice, yes.</p> <p>21 Q. Is that still the case?</p> <p>22 A. Pretty much, yes.</p> <p>23 Q. Is that, like, a G4S/Serco policy? Do you understand it</p> <p>24 to come from somewhere else?</p> <p>25 A. No, my understanding of it is that that's an HMPPS</p> <p style="text-align: center;">Page 129</p>	<p>1 I don't recall having a signed MOU.</p> <p>2 Q. But you were told to act according to the unsigned, as</p> <p>3 if it were --</p> <p>4 A. Yes. Yeah, I was told to act within the bounds of it,</p> <p>5 yes.</p> <p>6 Q. Do you remember who told you to do that?</p> <p>7 A. It was -- there was a direction from the Home Office and</p> <p>8 from senior leaders at Brook that that is how we</p> <p>9 should -- I should manage the relationship.</p> <p>10 Q. Who from the Home Office?</p> <p>11 A. I believe it would have been Paul.</p> <p>12 Q. Mr Gasson?</p> <p>13 A. Yes.</p> <p>14 Q. You mention at 251:</p> <p>15 "My role was to manage the MOU. Ben Saunders,</p> <p>16 Neil Davies and the Home Office set the agenda on how</p> <p>17 they wanted to manage the relationship and it was my</p> <p>18 role to follow that through."</p> <p>19 So the same people you have just mentioned there?</p> <p>20 A. (Witness nods).</p> <p>21 Q. You refer in your statement -- still on 251 -- to some</p> <p>22 correspondence between yourself and Ms Pincus of GDWG --</p> <p>23 A. Yes.</p> <p>24 Q. -- in which Mr Wilson and Steve Skitt and Paul Gasson</p> <p>25 are all copied in. I won't turn up the various reports</p> <p style="text-align: center;">Page 131</p>
<p>1 standard as set out in their manual, or the control and</p> <p>2 restraint manual. I think it -- I know Mr Collier's</p> <p>3 mentioned it, and I think it came as a bit of a surprise</p> <p>4 to a number of us when we read that recommendation.</p> <p>5 I think the working principle has always been that you</p> <p>6 use PPE.</p> <p>7 Q. Okay.</p> <p>8 A. I think it alludes to the fact -- I think it mentions</p> <p>9 about a risk assessment, but I don't know. I mean, we</p> <p>10 have tried to work through it. I don't know what sort</p> <p>11 of risk assessment you could do. So, yeah, generally,</p> <p>12 PPE is always worn for a planned use of force.</p> <p>13 Q. I want to move on now to ask about your relationship</p> <p>14 with the Gatwick Detainee Welfare Group. This is</p> <p>15 pages 56 and 57 of your statement from paragraph 250</p> <p>16 onwards. So you first mention the memorandum of</p> <p>17 understanding, so the MOU --</p> <p>18 A. Yes.</p> <p>19 Q. -- at 250. We heard from Mr Gasson yesterday, who</p> <p>20 believed that the MOU had been agreed, but your</p> <p>21 evidence, and indeed that of Gatwick Detainee Welfare</p> <p>22 Group, seems to be that it wasn't agreed.</p> <p>23 A. Yes, that's correct. I don't think I ever -- so part of</p> <p>24 my remit was to look after third parties, or, you know,</p> <p>25 to manage the MOUs or the SLAs that were in place.</p> <p style="text-align: center;">Page 130</p>	<p>1 unless you want to look at it, but the short version is</p> <p>2 Gatwick Detainee Welfare Group were requesting a room in</p> <p>3 which they could hold focus groups with detainees?</p> <p>4 A. Yes.</p> <p>5 Q. I think the idea was to talk about and improve Gatwick</p> <p>6 Detainee Welfare Group's work and you were the one who</p> <p>7 refused it. You say in your statement that you</p> <p>8 recognise that was unhelpful?</p> <p>9 A. I recognise the tone was. I think that specific one,</p> <p>10 the email I sent back to Anna, said, "I have sought</p> <p>11 guidance on this", so it wasn't my decision to refuse</p> <p>12 it.</p> <p>13 Q. That was going to be my next question. Whose decision</p> <p>14 was it?</p> <p>15 A. I don't know who specifically made that decision in that</p> <p>16 case. I suppose, like I've sort of said, I did feel,</p> <p>17 you know, very much like the middle man. I didn't set</p> <p>18 the agenda for the relationship with Gatwick Detainee</p> <p>19 Welfare Group.</p> <p>20 Q. As to who set the agenda, is that the same people I have</p> <p>21 just mentioned?</p> <p>22 A. Yeah, and I think James Wilson references a conversation</p> <p>23 he had with Ben where Ben raised concerns and</p> <p>24 conversations with Paul and Neil and Steve Skitt.</p> <p>25 Q. Did you say "Paul and Neil and Steve Skitt"?</p> <p style="text-align: center;">Page 132</p>

33 (Pages 129 to 132)

<p>1 A. Paul, Neil Davies, and then it turned into Steve Skitt.</p> <p>2 But I think, obviously, Steve -- you know, Steve, as</p> <p>3 a dep, would have taken a steer from Ben.</p> <p>4 Q. You were -- I don't want to say "middle man", but you</p> <p>5 were telling -- you were communicating with the GDWG but</p> <p>6 not always decisions that you'd made on your own?</p> <p>7 A. Yes.</p> <p>8 Q. You say, at 252, that the Home Office and Ben Saunders</p> <p>9 were concerned that the GDWG were trying to offer legal</p> <p>10 advice or create a surgery, and they felt that that</p> <p>11 crossed a boundary.</p> <p>12 A. Yes. I think the -- sorry.</p> <p>13 Q. No. Please.</p> <p>14 A. I think the view -- well, the view very much was that</p> <p>15 Gatwick Detainee Welfare Group were there to provide</p> <p>16 a social visit service for residents that didn't have</p> <p>17 anyone to come and see them. The drop-in sort of</p> <p>18 sessions were there to triage people, so they were there</p> <p>19 as a sort of introduction for them to pair a suitable</p> <p>20 volunteer with a suitable resident, to have social</p> <p>21 visits. Therefore, the view was that, why would you</p> <p>22 need more than one visit in that drop-in surgery?</p> <p>23 I think it's documented in some of James's bits that</p> <p>24 there'd been a number of -- or, you know, G4S at the</p> <p>25 time and the Home Office raising concerns about the role</p> <p style="text-align: center;">Page 133</p>	<p>1 A. It was still raised in -- I mean, as you can see from</p> <p>2 James's, yeah, they kept raising similar things.</p> <p>3 Q. Did you think that was fair?</p> <p>4 A. I think they -- I think the Home Office and G4S, in</p> <p>5 supporting that, had a concern. Is it right that you</p> <p>6 keep raising the same thing? You know, I don't know.</p> <p>7 I think there were other things that were raised as</p> <p>8 well. From memory, I believe there was a concern raised</p> <p>9 that someone from Gatwick Detainee Welfare Group had</p> <p>10 contacted us requesting multiple drop-ins because they</p> <p>11 were helping to manage someone's mental health and that</p> <p>12 they needed to see that person to continue supporting</p> <p>13 them.</p> <p>14 Q. Yes.</p> <p>15 A. I think the concern was that they hadn't raised that</p> <p>16 with G4S or with the Home Office, so I think that raised</p> <p>17 some concerns at how -- how are we supposed to safeguard</p> <p>18 that person in the centre when that information hasn't</p> <p>19 been shared? You know, our healthcare department</p> <p>20 wouldn't have known about it, we wouldn't have -- so</p> <p>21 I think that was one that I recall that I think was</p> <p>22 brought up as a concern. So I think those things</p> <p>23 combined, the Home Office and -- had an issue with.</p> <p>24 Q. Just to be clear, when we refer to drop-ins, it's not</p> <p>25 a drop-in in the normal sense of the word. So Gatwick</p> <p style="text-align: center;">Page 135</p>
<p>1 Gatwick Detainee Welfare Group were taking with</p> <p>2 residents in terms of supporting them with legal matters</p> <p>3 and ultimately supporting them in preventing removal.</p> <p>4 Q. So, in terms of supporting them with legal matters,</p> <p>5 obviously Gatwick Detainee Welfare Group aren't a legal</p> <p>6 entity.</p> <p>7 A. No.</p> <p>8 Q. There is no suggestion, I don't think, that they were</p> <p>9 litigating on their behalf or providing legal advice.</p> <p>10 Is this a reference to a witness statement that was made</p> <p>11 by a member of GDWG in 2015? Were you aware of that?</p> <p>12 A. Yeah, I think that's what kept being referenced, yes.</p> <p>13 Q. This was a detainee who was mentally unwell. The GDWG</p> <p>14 member of staff provided a witness statement about his</p> <p>15 presentation?</p> <p>16 A. Mmm.</p> <p>17 Q. And he was ultimately, I understand, released from</p> <p>18 detention and, indeed, there was a claim that was</p> <p>19 successful or was settled, maybe, for unlawful</p> <p>20 detention?</p> <p>21 A. Yeah, I don't know the details of that 2015 one.</p> <p>22 Q. But it was mentioned?</p> <p>23 A. Yes, it's in there.</p> <p>24 Q. People up to 2018, according to Mr Wilson, were still</p> <p>25 talking about it and raising it as a --</p> <p style="text-align: center;">Page 134</p>	<p>1 Detainee Welfare Group obviously didn't have free access</p> <p>2 to the centre?</p> <p>3 A. No.</p> <p>4 Q. And neither did they have a room in which detainees</p> <p>5 could come and drop in similar to the sort of welfare</p> <p>6 office that you do have at Brook House?</p> <p>7 A. Yes.</p> <p>8 Q. It was a prearranged and prebooked room?</p> <p>9 A. Yes, it was like a prebooked room in the visits</p> <p>10 corridor.</p> <p>11 Q. And they would have to say who they were meeting in that</p> <p>12 room. It wasn't drop in for anyone. The difference,</p> <p>13 I think, from a normal visit, is that instead of being</p> <p>14 in the public, kind of, big room of the visits hall, it</p> <p>15 was a private room?</p> <p>16 A. Yeah, it wasn't a social visit in the social visits</p> <p>17 area. It was in a small, contained room.</p> <p>18 Q. Yes, and detainees could have one of those private</p> <p>19 visits to ascertain the sort of support they'd need, who</p> <p>20 might visit them, et cetera?</p> <p>21 A. Yes.</p> <p>22 Q. Then they would be allocated a visitor to see in the</p> <p>23 visits hall. Sometimes, as you say, Gatwick Detainee</p> <p>24 Welfare Group would ask for a second drop-in, a second</p> <p>25 visit?</p> <p style="text-align: center;">Page 136</p>

34 (Pages 133 to 136)

<p>1 A. Yes.</p> <p>2 Q. We have seen examples of them saying it might be because</p> <p>3 someone shared something concerning on their first</p> <p>4 session, they wanted to discuss it again in private and</p> <p>5 the busy visits room wasn't the place to do it, they</p> <p>6 hadn't had a full assessment of their needs. That's</p> <p>7 reasonable, isn't it?</p> <p>8 A. I don't disagree. But was that -- I think where the</p> <p>9 concern would be is, was that information shared where</p> <p>10 there was a first concern, or were Gatwick Detainee</p> <p>11 Welfare Group keeping that information to themselves and</p> <p>12 managing that resident without sharing it to anyone</p> <p>13 else? Because that is really risky. Because what's to</p> <p>14 say that that resident doesn't go back to his room and</p> <p>15 try to harm himself and we haven't put around the sort</p> <p>16 of safeguarding that we should do. So I think that's --</p> <p>17 it was little incidents like that that I think were</p> <p>18 raising the concern profile.</p> <p>19 Q. Was that shared with Gatwick Detainee Welfare Group, in</p> <p>20 your view, adequately? Were they told, "The reason we</p> <p>21 are worried about these repeated visits is because we</p> <p>22 really want you to tell us when you have a concern about</p> <p>23 a detainee", or were they told, you know, "We have</p> <p>24 agreed one visit per person and that's all you're</p> <p>25 having"?</p> <p style="text-align: center;">Page 137</p>	<p>1 drop-ins, yes.</p> <p>2 Q. So they were empty threats?</p> <p>3 A. I would have been surprised if they'd taken away -- they</p> <p>4 might not have been. I don't know.</p> <p>5 Q. They weren't, as we understand it, in 2017, but do you</p> <p>6 know whether these discussions or threats to remove the</p> <p>7 drop-ins were made not just internally between G4S and</p> <p>8 the Home Office, but actually GDWG were aware of them?</p> <p>9 Because Mr Wilson recalls being at a meeting -- he</p> <p>10 doesn't say you were there -- with Mr Gasson and</p> <p>11 Mr Skitt, where he was told they'll be taken away?</p> <p>12 A. Yeah, I wasn't at that meeting. I was on leave. So</p> <p>13 I don't know what took place. Obviously what James has</p> <p>14 provided, he says that, that that's what was said.</p> <p>15 Q. But you recall there were discussions at the time about</p> <p>16 potentially removing the drop-ins?</p> <p>17 A. Yes, but I don't think they would have been taken away.</p> <p>18 Q. You don't know whether GDWG were made aware or how they</p> <p>19 were made aware that might happen?</p> <p>20 A. No.</p> <p>21 Q. I want to ask about your role on complaints now. So you</p> <p>22 describe this at page 11, paragraph 185 onwards, and you</p> <p>23 say you oversaw the complaints clerk at Brook House. We</p> <p>24 saw it at the start of your evidence on the organogram.</p> <p>25 Was that Karen Goulder?</p> <p style="text-align: center;">Page 139</p>
<p>1 A. I can't really recall in really great detail those</p> <p>2 visits that -- sorry, those meetings that I attended.</p> <p>3 I believe they were raised, and I believe we were saying</p> <p>4 to James, "Look, you know, those were some of</p> <p>5 the concerns we were having". I know James references,</p> <p>6 you know, the 2015 and, you know, references similar</p> <p>7 things being brought up, but that's where the concern</p> <p>8 was emanating from, and the concern also was that some</p> <p>9 of the activities that they wanted to get into were very</p> <p>10 much in conflict with the Home Office priority to remove</p> <p>11 people.</p> <p>12 Q. What sort of activities?</p> <p>13 A. In terms of offering legal support, so putting them in</p> <p>14 touch with legal providers, providing evidence for case</p> <p>15 notes, bits and pieces like that, I think is what the</p> <p>16 concern was.</p> <p>17 Q. It was contrary to the Home Office's desire to remove</p> <p>18 people?</p> <p>19 A. I mean, that's my own opinion. I can't speak for the</p> <p>20 Home Office or, you know, what Paul was, but that's</p> <p>21 definitely the feeling I had.</p> <p>22 Q. You say, at 255, you think there were discussions around</p> <p>23 removing the drop-ins but you don't think it would have</p> <p>24 actually occurred?</p> <p>25 A. I would have been shocked if they'd taken away the</p> <p style="text-align: center;">Page 138</p>	<p>1 A. Karen.</p> <p>2 Q. In brief, what did your complaints role entail?</p> <p>3 A. So it ensured that the process -- it was there to ensure</p> <p>4 that the process within the sort of DSO was followed, so</p> <p>5 it was there to ensure that the complaints we received</p> <p>6 from the Home Office on DCF9s were investigated and</p> <p>7 responded to and then shared, obviously, with relevant</p> <p>8 people.</p> <p>9 Q. Did you decide who would investigate any given</p> <p>10 complaint, or did Karen?</p> <p>11 A. Not generally. It generally wasn't Karen or I that</p> <p>12 decided. The general process was that the complaint</p> <p>13 would go to the relevant functional head. So if it was</p> <p>14 a complaint about something that was happening in</p> <p>15 residential, it would go to Jules for him to decide who</p> <p>16 would look at it; if it was a complaint that related to</p> <p>17 property and reception, it would go to the functional</p> <p>18 head for that area.</p> <p>19 Q. I see. Did you have training on how to manage the</p> <p>20 complaints system or --</p> <p>21 A. No.</p> <p>22 Q. -- handling complaints? Did Karen, do you know?</p> <p>23 A. Karen, no, I don't -- no, there was no -- we weren't</p> <p>24 trained on it.</p> <p>25 Q. Were complaints and the responses to them audited or</p> <p style="text-align: center;">Page 140</p>

35 (Pages 137 to 140)

<p>1 quality checked by anyone?</p> <p>2 A. So I did a 10 per cent audit of complaints, looking at</p> <p>3 whether they fell in line with the DSO. Karen would</p> <p>4 then send the results of those quality checks out to</p> <p>5 everyone.</p> <p>6 Q. The departmental heads?</p> <p>7 A. Yes, sorry, to the relevant person or the person that</p> <p>8 had completed that complaint for sort of, like,</p> <p>9 a lessons learned or, like, sharing of practice. And</p> <p>10 then all the complaint responses were shared back with</p> <p>11 the Home Office, so they were all sent back to their</p> <p>12 central team.</p> <p>13 Q. We have heard evidence from Mr Darren Tomsett -- you</p> <p>14 have been provided with, I think, just the relevant page</p> <p>15 from his evidence on the topic.</p> <p>16 A. Yes.</p> <p>17 Q. He says, and about him is said, 13 complaints were made</p> <p>18 over a three-year period and he was asked, at any stage</p> <p>19 during those three years, did anyone, not just look at</p> <p>20 the individual complaints, but take a step back and say,</p> <p>21 "Mr Tomsett, you have had 13 complaints over this period</p> <p>22 of time", and he said no. Did a certain number of</p> <p>23 complaints against someone trigger any kind of broader</p> <p>24 consideration of what's going on?</p> <p>25 A. So there wasn't a system in place for that. There is</p> <p style="text-align: center;">Page 141</p>	<p>1 comes.</p> <p>2 Q. So Sarah Newland, deputy director?</p> <p>3 A. Sarah Newland chairs, and then it's generally -- I've</p> <p>4 forgotten their titles now. The operations manager --</p> <p>5 it's Natasha Barber from the Home Office, generally,</p> <p>6 that comes along and other ADs and Steve Hewer often</p> <p>7 comes along.</p> <p>8 Q. Do you look at what happened in the previous set period</p> <p>9 of time and how do you get an idea of the longer scope?</p> <p>10 A. It is an ongoing spreadsheet. It just keeps being added</p> <p>11 to. So it's not a snapshot of a time period, it is</p> <p>12 a consecutive -- like a continuous record.</p> <p>13 Q. Going back to complaints as they were in 2017, just</p> <p>14 briefly, obviously you have a population who move</p> <p>15 around, might leave the centre?</p> <p>16 A. Mmm.</p> <p>17 Q. What could you or Ms Goulder or any of the people</p> <p>18 investigating the complaints do if there's a complaint</p> <p>19 but they can't fully investigate it before the detained</p> <p>20 person has left?</p> <p>21 A. Sometimes it was difficult. We always tried to make</p> <p>22 contact if we could. So if they'd moved to another</p> <p>23 centre, we would try and make contact with them there.</p> <p>24 If they'd been released and there was no address, then</p> <p>25 it was difficult to make contact. Or obviously, if they</p> <p style="text-align: center;">Page 143</p>
<p>1 now, and rightly so, and it's monitored really closely.</p> <p>2 So we share -- we have, like, a cultural spreadsheet</p> <p>3 that we share with the Home Office and the SMT and that</p> <p>4 will capture a number of different indicators, but it</p> <p>5 captures resident complaints, staff complaints,</p> <p>6 grievances, number of uses of force that a potential</p> <p>7 individual has taken on. We meet every two weeks to</p> <p>8 sort of review that and to look at that. So, yeah,</p> <p>9 there was nothing in place at the time. But</p> <p>10 post Panorama, and in the new contract with Serco,</p> <p>11 there's a lot more scrutiny on it, so it wouldn't be</p> <p>12 allowed to happen again.</p> <p>13 Q. In relation to the cultural spreadsheet with those data</p> <p>14 that you mentioned, when did that come into place?</p> <p>15 A. It started to come into place after Panorama. It was</p> <p>16 part of the Panorama action plan. I think it was the</p> <p>17 dep that was -- that had oversight of that. So all the</p> <p>18 sort of relevant complaints were shared and we started</p> <p>19 to look at it. It's been refined quite significantly</p> <p>20 since Serco have taken over.</p> <p>21 Q. You say you meet every two weeks?</p> <p>22 A. Now we do, yes.</p> <p>23 Q. Who is at those meetings?</p> <p>24 A. It's chaired by the dep director, Sarah, and the</p> <p>25 compliance manager or ops manager from the Home Office</p> <p style="text-align: center;">Page 142</p>	<p>1 had been removed. So we would -- yeah. If someone had</p> <p>2 left and there was no forwarding address, we would still</p> <p>3 investigate it and we would still write an outcome to</p> <p>4 that investigation and we would still send it back to</p> <p>5 the Home Office. We just couldn't inform the resident</p> <p>6 that there'd been an outcome.</p> <p>7 Q. Or hear their account, potentially, if they have left?</p> <p>8 A. Or potentially hear their account. Generally, the</p> <p>9 accounts are fairly descriptive that they write on the</p> <p>10 DCF9s.</p> <p>11 Q. Right.</p> <p>12 A. So you would have to go by that.</p> <p>13 Q. I want to ask you about a specific event. So this is</p> <p>14 your involvement with Mr Instone-Brewer and Mr Fagbo's</p> <p>15 disciplinary. The inquiry has seen notes of the 2017</p> <p>16 interview with Michelle Brown and you have been asked</p> <p>17 about it in your statement. She was asked, "Can you</p> <p>18 tell any more about Mr Instone-Brewer and Mr Fagbo?",</p> <p>19 and she said:</p> <p>20 "I think, during 2016, a detainee made a complaint</p> <p>21 against them for poor behaviour, bullying and</p> <p>22 inappropriate behaviour which was substantiated.</p> <p>23 DCO James Begg investigated and reported to</p> <p>24 Jules Williams. It was due to go to disciplinary but</p> <p>25 Luke Instone-Brewer submitted a grievance and the</p> <p style="text-align: center;">Page 144</p>

36 (Pages 141 to 144)

<p>1 disciplinary was paused. The grievance took 8 months. 2 Stacie Dean was allocated to it but she fell ill. 3 Caz Dance-Jones heard it in November 2016 and it was 4 partially substantiated. Dan Haughton had been given 5 the disciplinary to do but he forgot to do it." 6 So according to Ms Michelle Brown, you were supposed 7 to investigate and she says you forgot and she says in 8 her recent statement to the inquiry that when she asked 9 you about these circumstances, you said that the 10 investigations didn't occur due to absences and failures 11 in managing DCO Fagbo's absence. I understand that you 12 say you talked about -- you -- sorry, it is not the 13 first time you have heard about her saying you forgot, 14 is it? 15 A. No. 16 Q. You heard that much closer to the time? 17 A. She mentioned it, I suppose, there, and I can't remember 18 in what setting, I don't know if it was in a meeting or 19 it was coming out of something. I remember my -- all 20 I can recall is my initial gut instinct and my reaction, 21 and I won't -- I said to her, "I don't think -- I don't 22 think you're right". I might not have used that 23 language. But I remember being quite surprised. 24 I didn't recall having it at the time when she mentioned 25 it. It felt like -- yeah, it felt like she was blaming</p> <p style="text-align: right;">Page 145</p>	<p>1 A. No, if there was a resident complaint of bad behaviour 2 that had been investigated as part of the complaints and 3 substantiated, that would have then generated, sort of 4 within G4S, its own internal sort of disciplinary 5 procedure. 6 Q. Who was in charge of the disciplinary process? 7 A. I mean, it was co-ordinated by senior managers and HR, 8 so you would have had -- someone would have said, "This 9 isn't appropriate, I'll issue terms of reference for an 10 investigation". You would have gone through 11 a disciplinary hearing and more fact finding, more 12 evidence collation. That would generate an outcome or 13 a report to say what the findings were. That report 14 would then be issued to someone to have an outcome, be 15 that disciplinary, be it no further action, be it 16 whatever the action might be. 17 Q. It could have been someone at your level to whom it was 18 issued to deal with it, but it could have been somebody 19 else at your level; is that right? 20 A. Yeah, I mean, it could have been -- for the 21 investigation, it could have been a DCM that was 22 investigating and then it would have come to a senior 23 manager to do the disciplinary. 24 Q. I see. That's the only thing I wanted to ask you on 25 that. Now, I want to turn to your reaction to Panorama,</p> <p style="text-align: right;">Page 147</p>
<p>1 me for forgetting something that I had no knowledge of. 2 I find it -- looking at it now, I can't recall it. 3 I can't recall being issued it to complete. I find it 4 surprising or hard to believe that a grievance or 5 a disciplinary outcome that would have been issued to me 6 by a senior manager or by HR had just been allowed to 7 not take place, because that wasn't a common thing. 8 So, surely, if I'd been issued a pack and given an 9 instruction to complete a disciplinary, there would have 10 been a catch-up or a check-in to say, "How are you 11 getting on with that disciplinary, Dan?" Or at the 12 point I said, "Oh, I forgot about that", I would have 13 completed it. So, you know, I -- whilst I can't recall 14 it, it doesn't feel right to me, and I -- you know, as 15 far as I can, I deny, you know, her comment. I can't 16 see how it could be allowed to happen. I haven't 17 left -- I have never forgotten to complete 18 a disciplinary in my career, so, yeah, I can't see how 19 that would take place. 20 Q. Is the disciplinary investigation scheme, or was it, 21 different from the complaints investigation scheme that 22 you were head of with Karen Goulder? 23 A. Yes. 24 Q. So it is not the case that because it's a disciplinary 25 it would have been for your team to process?</p> <p style="text-align: right;">Page 146</p>	<p>1 so -- I assume you watched it? 2 A. I did. 3 Q. You have watched some of the evidence, I understand, so 4 far given to this inquiry? 5 A. Yes. 6 Q. What's shown on the footage and what we have heard so 7 far paint a picture of a negative culture at Brook House 8 at the time. We see things like swearing and 9 disrespectful language used towards detainees, a lack of 10 understanding of people in crisis, perhaps, as well as 11 the more tangible acts of abuse that we see as well. 12 A. Mmm. 13 Q. We have heard and seen staff who were overworked and 14 felt understaffed. Was this the same as your impression 15 of Brook House on the ground during this time, or did 16 any aspect of what you saw surprise you? 17 A. I think it was horrific, the stuff that was shown on 18 Panorama, and I wish that we'd had the processes in 19 place to identify it, because I remember sitting there 20 and it just being in such stark contrast to the job 21 I knew that the majority of people did. I wasn't aware 22 of that behaviour and I hadn't seen it. Had I heard 23 swearing? And, you know, yes, it's -- you know, people 24 do swear. Had I heard it directly towards a resident 25 inappropriately? No. But, no, I definitely didn't</p> <p style="text-align: right;">Page 148</p>

37 (Pages 145 to 148)

<p>1 think there was a culture of abuse and what was seen on</p> <p>2 Panorama. It was horrible to watch.</p> <p>3 Q. You said "I wish that we'd had the processes in place to</p> <p>4 identify it". What processes do you think might have</p> <p>5 helped you to identify it?</p> <p>6 A. Well, going back to things like the complaint -- you</p> <p>7 know, the Darren Tomsett thing, the cultural stuff that</p> <p>8 we have got in place now, definitely helps us identify</p> <p>9 people that are more often or not involved in resident</p> <p>10 complaints or use of -- you know, uses of force, those</p> <p>11 types of indicators. It's not to say it's perfect, but,</p> <p>12 you know, it's -- the fact that none of us registered</p> <p>13 that that was happening, you know, it was hard to take.</p> <p>14 Q. One thing we have heard about specifically is the lack</p> <p>15 of mental health training for officers.</p> <p>16 A. Mmm.</p> <p>17 Q. Did you -- were you aware of that at the time?</p> <p>18 A. Yes, so part of my remit was training. So we delivered</p> <p>19 mental health training as part of the ITC. It was --</p> <p>20 I think it was about a four-hour session in the morning.</p> <p>21 It was part of the Prison Service package around</p> <p>22 self-harm and suicide prevention, so it was called an</p> <p>23 introduction to mental health. And that was the sort of</p> <p>24 established standard that people needed to complete.</p> <p>25 Again, I've heard mental health training discussed</p> <p style="text-align: center;">Page 149</p>	<p>1 getting it, and we produced a programme where existing</p> <p>2 staff would attend the ITC to also get it. So we were</p> <p>3 upskilling not only the new staff, but the existing</p> <p>4 staff, and we tried to prioritise the sort of E wing and</p> <p>5 CSU staff because that's obviously where it is. But,</p> <p>6 again, that training acts -- you know, it is about</p> <p>7 identifying risk with a person and with yourself, so it</p> <p>8 helps you identify mental health concerns with your</p> <p>9 colleagues and yourself so you can look after yourself,</p> <p>10 but it also helps increase your understanding of certain</p> <p>11 mental health conditions, and it gives you a bit more of</p> <p>12 an insight into the triggers or the signs to look out</p> <p>13 for.</p> <p>14 Q. I know you can't train everyone at once, but is that</p> <p>15 going to be mandatory?</p> <p>16 A. It is now.</p> <p>17 Q. It is mandatory?</p> <p>18 A. As far as I believe, it's mandatory now. It's part of</p> <p>19 the ITC.</p> <p>20 Q. Have you been able to assess the efficacy of that? Do</p> <p>21 people feel it's helped them to, as you say, identify</p> <p>22 concerns?</p> <p>23 A. I think -- well, especially for my role now, I believe</p> <p>24 the staff group are brilliant at raising concerns about</p> <p>25 vulnerabilities, including mental health. We have done</p> <p style="text-align: center;">Page 151</p>
<p>1 a lot in the inquiry, and, again, it's a difficult one</p> <p>2 to quantify what the right amount is. Because we are</p> <p>3 not training people to be clinical staff, we are not</p> <p>4 training them to diagnose. What we want our officers to</p> <p>5 be able to do is identify a concern with a resident and</p> <p>6 say, "I'm not happy with that" and refer them to the</p> <p>7 professionals for them to have a full and proper</p> <p>8 assessment with a medical professional. We do more now.</p> <p>9 Lee Hanford and I, as part of post Panorama, introduced</p> <p>10 mental health first aid training, so that came online in</p> <p>11 2018.</p> <p>12 Q. What does that consist of?</p> <p>13 A. So it's a day's training. It is affiliated to -- and</p> <p>14 I might get this wrong, so please excuse me -- the</p> <p>15 mental health -- British Mental First -- Mental Health</p> <p>16 First Aid Association. I can't quite remember if I've</p> <p>17 got that right. It is a bit of a tongue twister.</p> <p>18 Q. That's fine.</p> <p>19 A. But it is a set programme that's a certificated course.</p> <p>20 We went to a training provider. I can't recall</p> <p>21 100 per cent. I think it was Aid Training. They did</p> <p>22 a lot of work with us for first aid and some other bits</p> <p>23 and pieces. So I think we went to them and they sent us</p> <p>24 a sort of qualified trainer. So it was a day session.</p> <p>25 We introduced it to the ITC, so all new officers were</p> <p style="text-align: center;">Page 150</p>	<p>1 so much work around vulnerabilities. It's still not --</p> <p>2 we can still do more, we always can, but we get staff</p> <p>3 raising concerns really early about people they're</p> <p>4 concerned about for a number of different reasons, be it</p> <p>5 a withdrawal from regime or sort of a change in</p> <p>6 behaviour. We monitor it. We have got weekly, sort of,</p> <p>7 vulnerability meetings where we manage our sort of real</p> <p>8 risky people. So I think it has had an impact. Does it</p> <p>9 still -- you know, we look after, at Brook House, some</p> <p>10 mentally unwell people. You know, we look after people</p> <p>11 that are on section. Are staff adequately trained to</p> <p>12 properly manage someone who is under a section? No.</p> <p>13 But they would need to be clinically trained in order to</p> <p>14 do that. They do an amazing job and have some amazing</p> <p>15 results. In the last year or two, there's a number of</p> <p>16 different residents that have had very good outcomes</p> <p>17 based on the staff interaction with them, but they are</p> <p>18 not clinical staff.</p> <p>19 Q. You rely on the clinical staff that you have there as</p> <p>20 well?</p> <p>21 A. We rely on the clinical team, yeah, to give us a steer</p> <p>22 in how best to try and look after them.</p> <p>23 Q. Do you think that your staff are getting an appropriate</p> <p>24 steer from that team?</p> <p>25 A. I think it's a lot better than what it was. There's</p> <p style="text-align: center;">Page 152</p>

38 (Pages 149 to 152)

<p>1 a lot more multi-disciplinary working that goes on and</p> <p>2 a lot more input from healthcare and the clinical side,</p> <p>3 yes.</p> <p>4 Q. You have said -- you acknowledge Brook House isn't</p> <p>5 perfect, you can always do more. You're now assistant</p> <p>6 director. If you had to identify a couple of things</p> <p>7 that are next on your list for what you want to achieve</p> <p>8 to continue to improve, what would they be?</p> <p>9 A. In my remit? The things I'm focusing on at the moment</p> <p>10 is the care plans for ACDTs and making sure that they</p> <p>11 are more holistic and there's better support in there</p> <p>12 for the residents to try and manage their risks. We are</p> <p>13 looking at Adults at Risk and trying to really improve</p> <p>14 staff's basic knowledge of it. It's better than what it</p> <p>15 was. So that's part of a new document and DSO that we</p> <p>16 are rolling out called vulnerable adult care plans. So</p> <p>17 they're -- yeah, ACDT care maps, AAR, Adults at Risk,</p> <p>18 and also just looking at -- we are just trying to raise</p> <p>19 the profile of safeguarding, really, at the moment.</p> <p>20 MS MOORE: Thank you. I don't have any more questions for</p> <p>21 you, Mr Haughton. The chair may have a question or two</p> <p>22 for you.</p> <p>23 THE CHAIR: Thank you, Mr Haughton. Just a couple of very</p> <p>24 brief ones about how things are in Brook House now.</p> <p>25 A. Sure.</p> <p style="text-align: center;">Page 153</p>	<p>1 so it -- you know, you naturally -- I think you</p> <p>2 naturally lose more people than most industries.</p> <p>3 I think Serco have improved conditions for staff, but</p> <p>4 I think you will always have, you know, conflicts with</p> <p>5 pay -- can you get paid more in other less-pressurised</p> <p>6 roles? -- and that -- I think that drives some of</p> <p>7 the recruitment or some of the retention issues.</p> <p>8 THE CHAIR: Thank you very much. I have no other questions</p> <p>9 for you. Thank you very much. I know you have been</p> <p>10 with us for a long time today but I'm very grateful for</p> <p>11 your evidence.</p> <p>12 A. Not at all.</p> <p>13 (The witness withdrew)</p> <p>14 MS MOORE: Chair, it is 2.50 pm. If we return at 3.05 pm</p> <p>15 for the evidence of Mr Cheeseman.</p> <p>16 THE CHAIR: Thank you very much.</p> <p>17 (2.50 pm)</p> <p>18 (A short break)</p> <p>19 (3.08 pm)</p> <p>20 MS SIMCOCK: Chair, the witness this afternoon is</p> <p>21 Mr Ian Cheeseman.</p> <p>22 MR IAN CHEESEMAN (affirmed)</p> <p>23 Examination by MS SIMCOCK</p> <p>24 MS SIMCOCK: Can you give your full name to the inquiry,</p> <p>25 please?</p> <p style="text-align: center;">Page 155</p>
<p>1 Questions from THE CHAIR</p> <p>2 THE CHAIR: What's the minimum number of DCO staff that you</p> <p>3 have on the wings at the moment?</p> <p>4 A. It's -- I believe it's three on the wing and one for</p> <p>5 courtyard. So there's four officers to manage the wing</p> <p>6 and one DOM -- so there's one manager per wing.</p> <p>7 THE CHAIR: So what would have been a DCM but is now a --</p> <p>8 A. Yes, so what a DCM was.</p> <p>9 THE CHAIR: Thank you. Do you have staffing shortages at</p> <p>10 the moment?</p> <p>11 A. Yes.</p> <p>12 THE CHAIR: Can you tell me a bit about why that is?</p> <p>13 A. It's very difficult to recruit into, it always has been,</p> <p>14 to find the right people. So that's one thing. It's --</p> <p>15 we have found recently, in the last few months, it's</p> <p>16 a very competitive labour market, so lots of people</p> <p>17 are -- where we had a surge of recruitment in during</p> <p>18 Covid, where people were displaced from their sort of</p> <p>19 professions, those people are now going back to their</p> <p>20 previous professions. And it's a tough place to work.</p> <p>21 It's not an everyday job, and I don't think it's</p> <p>22 something that, with all the training in the world, you</p> <p>23 can fully prepare people for. So I think some people</p> <p>24 get into it and realise that it's not for them. It's --</p> <p>25 the officers do a very, very tough job. It's -- yeah,</p> <p style="text-align: center;">Page 154</p>	<p>1 A. Yes, it's Ian Cheeseman.</p> <p>2 Q. Mr Cheeseman, you made a witness statement for the</p> <p>3 purposes of the inquiry, and the reference is</p> <p>4 <HOM0332154>. I'm going to ask you about some of</p> <p>5 the topics within that statement, but because I'm going</p> <p>6 to ask that it's adduced into evidence in full, that</p> <p>7 stands as your evidence and I may not ask you about</p> <p>8 every single line of it, so you understand that. You</p> <p>9 previously worked for the Home Office. I understand you</p> <p>10 retired in 2020; is that right?</p> <p>11 A. That's correct.</p> <p>12 Q. Whenabouts in 2020 did you retire?</p> <p>13 A. November 20th.</p> <p>14 Q. Prior to your retirement, you worked in various</p> <p>15 different Home Office departments, you say for 33 years,</p> <p>16 from 1987; is that right?</p> <p>17 A. Yes.</p> <p>18 Q. You worked in a number of different roles as executive</p> <p>19 officer, higher executive officer and senior executive</p> <p>20 officer, and then as a grade 7 civil servant. Were you</p> <p>21 a grade 7 civil servant when you retired?</p> <p>22 A. Yes, I was.</p> <p>23 Q. You latterly, you say, worked -- your main roles were in</p> <p>24 the policy area; is that right?</p> <p>25 A. For the last 25 years of my time in the Home Office, it</p> <p style="text-align: center;">Page 156</p>

39 (Pages 153 to 156)

<p>1 was mainly policy work, yes.</p> <p>2 Q. You were a policy advisor and you say that you did not,</p> <p>3 therefore, have operational functions or direct roles</p> <p>4 specific to the Brook House Immigration Removal Centre</p> <p>5 during the relevant period; is that right?</p> <p>6 A. That's correct.</p> <p>7 Q. You again say that you were a policy advisor in the</p> <p>8 Home Office unit responsible for, among other things,</p> <p>9 policy concerning those deemed to be vulnerable in</p> <p>10 a detention context; is that right?</p> <p>11 A. Correct.</p> <p>12 Q. A principal responsibility in this context was the</p> <p>13 framework for developing Home Office policy on making</p> <p>14 operational decisions on whether to detain an individual</p> <p>15 or to continue to detain an individual considered to be</p> <p>16 vulnerable; is that right?</p> <p>17 A. Yes.</p> <p>18 Q. That was the main role that you had prior to your</p> <p>19 retirement?</p> <p>20 A. Yes.</p> <p>21 Q. You also, you tell us in your statement, were involved</p> <p>22 on a secondment to the Shaw review; is that right?</p> <p>23 A. Yes, it is.</p> <p>24 Q. You were part of his team seconded from the Home Office.</p> <p>25 Do you know why you, in particular, were suggested for</p> <p style="text-align: center;">Page 157</p>	<p>1 Brook House.</p> <p>2 Q. If you can remember, which stakeholders would you have</p> <p>3 met with?</p> <p>4 A. There were a range of stakeholder meetings. They're</p> <p>5 detailed in one of the appendices to the -- to</p> <p>6 Stephen Shaw's report. I would have attended a number</p> <p>7 of these. The only one I can remember with any</p> <p>8 accuracy, the name of the organisation was Women for</p> <p>9 Refugee Women.</p> <p>10 Q. Did you take steps to inform yourself with an</p> <p>11 understanding of what the Home Office already knew about</p> <p>12 problems within immigration detention as it related to</p> <p>13 vulnerable people prior to taking up this role?</p> <p>14 A. It happened very quickly. So I think there was only</p> <p>15 possibly a week's pause between me finding out that</p> <p>16 I was going to be doing the Shaw review and actually</p> <p>17 starting. So there wasn't a lot of time to immerse</p> <p>18 myself in the detail of immigration detention. But</p> <p>19 Stephen Shaw was a good teacher and I learned quickly.</p> <p>20 Q. Because it would have been important to understand why</p> <p>21 the Shaw review was necessary, wouldn't it?</p> <p>22 A. Oh, I understood that, certainly.</p> <p>23 Q. What did you understand as to why it was necessary?</p> <p>24 A. My understanding was that there had been concerns</p> <p>25 growing over a period of time about the provision of</p> <p style="text-align: center;">Page 159</p>
<p>1 this role or did you volunteer?</p> <p>2 A. I was working in asylum policy at the time. I had</p> <p>3 worked there for about six years, I think. And,</p> <p>4 usually, in the Civil Service, you move around from time</p> <p>5 to time. And I just needed a new challenge. I put my</p> <p>6 name out there. The director-general's chief of staff</p> <p>7 was aware of this and she suggested me for this role.</p> <p>8 I met Stephen Shaw. He seemed okay with me. I was</p> <p>9 happy to do the work and so I moved there.</p> <p>10 Q. Was your background in policy in relation to the</p> <p>11 detention of vulnerable people considered to be relevant</p> <p>12 experience and expertise for this particular role?</p> <p>13 A. I hadn't worked in detention policy prior to that.</p> <p>14 I worked in asylum policy. But in asylum policy, I was</p> <p>15 responsible for, primarily, asylum policy in respect of</p> <p>16 LGBT individuals, women, children, so there was a kind</p> <p>17 of vulnerability angle to that. But I don't know</p> <p>18 whether that played a role in my being offered that</p> <p>19 post.</p> <p>20 Q. You say that your involvement included visiting IRCs</p> <p>21 with Stephen Shaw and attending meetings with</p> <p>22 stakeholders; is that right?</p> <p>23 A. That's correct.</p> <p>24 Q. Did you visit Brook House?</p> <p>25 A. Yes. I accompanied Stephen Shaw on his visit to</p> <p style="text-align: center;">Page 158</p>	<p>1 welfare for immigration detainees, and specifically the</p> <p>2 Home Secretary at the time was responding to those</p> <p>3 concerns by requesting -- asking Mr Shaw to carry out</p> <p>4 a review.</p> <p>5 Q. Were you aware of rulings in article 3 cases in the</p> <p>6 High Court, particularly in the cases of HA and D, both</p> <p>7 of which were cases where the court found an article 3</p> <p>8 breach whilst the individual was detained at</p> <p>9 Brook House?</p> <p>10 A. I don't think I was aware of that at the time I started.</p> <p>11 But I would have become aware as time went on.</p> <p>12 Q. So you would have been aware that the court there had</p> <p>13 found failures of rule 35(1) to identify the severity of</p> <p>14 mental ill-health and in the ability of the detention</p> <p>15 environment to treat mental health. That was something</p> <p>16 that, generally, you would have been aware of during</p> <p>17 your time at the Shaw review?</p> <p>18 A. Possibly. It certainly would have been something that</p> <p>19 was discussed. Whether I engaged or needed to engage</p> <p>20 with that particular issue in any detail, I don't</p> <p>21 recall.</p> <p>22 Q. Do you know, or do you remember now, if you were aware</p> <p>23 at the time that the court had also ruled that the</p> <p>24 Home Office had breached its equalities duties by the</p> <p>25 introduction of a satisfactory management criteria into</p> <p style="text-align: center;">Page 160</p>

40 (Pages 157 to 160)

<p>1 the policy, such that mentally ill detainees would</p> <p>2 remain in detention if they could be satisfactorily</p> <p>3 managed? Do you think you were aware of that issue at</p> <p>4 the time?</p> <p>5 A. I don't recall as a specific issue.</p> <p>6 Q. The court had ruled that the Home Office was required to</p> <p>7 do an equality impact assessment. They didn't, and,</p> <p>8 instead, the Tavistock review was announced and then the</p> <p>9 Shaw review. Were you aware of the Tavistock review and</p> <p>10 the Shaw review being in response to these cases of</p> <p>11 litigation, at least in part?</p> <p>12 A. I can't say that I necessarily knew that connection.</p> <p>13 I may have at the time, but it wasn't a kind of major</p> <p>14 element in my role in the Shaw review.</p> <p>15 Q. Were you aware, prior to starting, of the parliamentary</p> <p>16 inquiry in 2015?</p> <p>17 A. I can't remember.</p> <p>18 Q. Because that inquiry had identified, amongst other</p> <p>19 things, inadequate health screening, inadequate</p> <p>20 healthcare, and safeguards for identifying vulnerability</p> <p>21 and mental ill-health and defects in the rule 35</p> <p>22 process. Were you aware of those as issues that had</p> <p>23 been identified prior to the Shaw review?</p> <p>24 A. I can't say that I was aware within the context you've</p> <p>25 just described.</p> <p style="text-align: right;">Page 161</p>	<p>1 basis for them for the purposes of informing policy</p> <p>2 formulation for the Adults at Risk policy; is that</p> <p>3 right?</p> <p>4 A. Yes, absolutely.</p> <p>5 Q. The formulation of that policy, the Adults at Risk</p> <p>6 policy, was primarily your responsibility; is that</p> <p>7 right?</p> <p>8 A. Yes. I was working in the policy team that was</p> <p>9 responsible for taking forward certain of Mr Shaw's</p> <p>10 recommendations, primarily numbers 7 to 16, I believe,</p> <p>11 or 9 to 16.</p> <p>12 Q. 9 to 16, I think you say in your statement.</p> <p>13 A. 9 to 16.</p> <p>14 Q. We will come to those in a moment.</p> <p>15 A. Yes.</p> <p>16 Q. Shaw found that there were systemic failings in the</p> <p>17 rule 35 process. He had said that it didn't do what it</p> <p>18 was intended to do, which was to protect vulnerable</p> <p>19 people. Were you aware of that as a key finding at the</p> <p>20 time?</p> <p>21 A. Yes.</p> <p>22 Q. He considered that the cause of that finding was a lack</p> <p>23 of trust by the Home Office in the GPs completing the</p> <p>24 rule 35 reports and in the system itself that the</p> <p>25 Home Office had created. Were you aware of that?</p> <p style="text-align: right;">Page 163</p>
<p>1 Q. Were you aware at the time that the Home Office response</p> <p>2 to the parliamentary inquiry was that they would address</p> <p>3 those issues in the Shaw review?</p> <p>4 A. I may have been, but I can't remember at this distance</p> <p>5 of time.</p> <p>6 Q. If you weren't aware at the time, given you were the</p> <p>7 Home Office official seconded to the Shaw review, how</p> <p>8 would those elements have fed into the Shaw review?</p> <p>9 A. There were three Home Office officials seconded to the</p> <p>10 review, and we, to an extent, compartmentalised our</p> <p>11 responsibilities. One of my chief responsibilities on</p> <p>12 the Shaw review was to produce the review of policies in</p> <p>13 relation -- Home Office policies in relation to</p> <p>14 detention. So -- another member of the team may have</p> <p>15 focused on those particular issues. Mr Shaw himself was</p> <p>16 well immersed in all of these issues, I'm sure, and he</p> <p>17 obviously was the author of the report.</p> <p>18 I think it possibly wasn't necessary for me to know</p> <p>19 those issues in detail.</p> <p>20 Q. Dealing, then, with the outcome of the Shaw review and</p> <p>21 the key findings made, as part of his team, you would</p> <p>22 have been well aware of the findings and recommendations</p> <p>23 made by that review?</p> <p>24 A. Yes.</p> <p>25 Q. It was important to understand those findings and the</p> <p style="text-align: right;">Page 162</p>	<p>1 A. I don't remember that specifically, but, you know,</p> <p>2 I accept that that is the case.</p> <p>3 Q. Did you agree with it?</p> <p>4 A. I'm not sure that I personally would have had the</p> <p>5 evidence to agree or disagree at that point.</p> <p>6 Q. Mr Shaw said that training or redesigning the rule 35</p> <p>7 forms, the documentation, wouldn't, alone, address the</p> <p>8 issue. Were you aware of that finding?</p> <p>9 A. Yeah, I mean, if I hadn't focused on that finding at the</p> <p>10 time, it certainly would have become apparent to me as</p> <p>11 I began to work on the Adults at Risk policy.</p> <p>12 Q. Shaw also criticised the phrase "satisfactory management</p> <p>13 in detention" in relation to mental ill-health. Were</p> <p>14 you aware of that?</p> <p>15 A. Yes, I am.</p> <p>16 Q. He said in particular:</p> <p>17 "It's perfectly clear to me that people with serious</p> <p>18 mental illness continue to be held in detention and that</p> <p>19 their treatment and care does not, and cannot, equate to</p> <p>20 good psychiatric practice, whether or not it is</p> <p>21 satisfactorily managed. Such a situation is an affront</p> <p>22 to civilised values."</p> <p>23 You were aware of that at the time?</p> <p>24 A. I can't remember it verbatim, but, yes, in general</p> <p>25 terms.</p> <p style="text-align: right;">Page 164</p>

41 (Pages 161 to 164)

<p>1 Q. He recommended, as a result, that key categories of</p> <p>2 vulnerability should be retained but that a further</p> <p>3 clause should be added to the list that was in place at</p> <p>4 the time to reflect the dynamic nature of vulnerability</p> <p>5 and thus encompass persons otherwise identified as being</p> <p>6 sufficiently vulnerable that their continued detention</p> <p>7 would be injurious to their welfare and that such</p> <p>8 a clause also would be helpful in relation to those with</p> <p>9 a disability. Presumably, you appreciated that</p> <p>10 recommendation at the time?</p> <p>11 A. Yes, indeed.</p> <p>12 Q. He had also found that there was a failure by</p> <p>13 Home Office staff to appreciate the difficulties faced</p> <p>14 by people suffering from PTSD and to recognise that</p> <p>15 detention can be re-traumatising. Was that something</p> <p>16 that you were aware of as a finding at the time?</p> <p>17 A. Yes.</p> <p>18 Q. Professor Bosworth carried out a literature review in</p> <p>19 relation to the Shaw review. That literature review</p> <p>20 found that detention, of itself, was harmful to those</p> <p>21 with vulnerabilities and mental health and Mr Shaw in</p> <p>22 his review accepted those findings. Were you aware of</p> <p>23 that at the time?</p> <p>24 A. Yeah, I think there was a general acceptance that</p> <p>25 detention had the potential to impact negatively on</p> <p style="text-align: center;">Page 165</p>	<p>1 an insurance that far fewer vulnerable people were</p> <p>2 segregated or, indeed, detained initially if they were</p> <p>3 going to be subject to segregation whilst in detention?</p> <p>4 A. I can see your point and that may well be the case, but,</p> <p>5 as I said, the purpose of the policy was to provide</p> <p>6 a framework for making decisions I described. You could</p> <p>7 argue that the policy should have gone wider than that</p> <p>8 and dealt with other issues. But --</p> <p>9 Q. Did you think it should have done?</p> <p>10 A. I didn't consider that.</p> <p>11 Q. Do you now think it should have done?</p> <p>12 A. I don't have a view.</p> <p>13 Q. The Shaw review also -- there was a sub-review by</p> <p>14 Jeremy Johnson of counsel in relation to article 3 cases</p> <p>15 which found that common features among the article 3</p> <p>16 cases going through the courts included as -- serious</p> <p>17 mental illness was not identified or treated,</p> <p>18 deterioration in detention leading to severe mental</p> <p>19 illness and also incidents of use of force or</p> <p>20 segregation inappropriately which related to systemic</p> <p>21 issues as to failures or breach of policy and couldn't</p> <p>22 simply be ascribed to individual decision makers. Were</p> <p>23 you aware of that conclusion?</p> <p>24 A. I'm sorry, that was rather long. Would you mind</p> <p>25 repeating it?</p> <p style="text-align: center;">Page 167</p>
<p>1 people, particularly those with mental health</p> <p>2 conditions.</p> <p>3 Q. Shaw was also particularly concerned that segregation</p> <p>4 may, on occasions, become the default location for those</p> <p>5 with serious mental health problems, and without mental</p> <p>6 health care, which he said was not consonant with</p> <p>7 detainees' welfare and may represent cruel and unusual</p> <p>8 punishment. He found segregation facilities were not</p> <p>9 suitable for any detainees with a serious mental health</p> <p>10 condition. Were you aware of that at the time?</p> <p>11 A. Yes, but it wouldn't have been something that I majored</p> <p>12 on because it wasn't directly related to the policy work</p> <p>13 I undertook subsequently.</p> <p>14 Q. Didn't you think that the fact that segregation was</p> <p>15 found to be unsuitable for vulnerable detainees with</p> <p>16 serious mental health conditions was relevant to an</p> <p>17 Adults at Risk policy?</p> <p>18 A. The purpose of the policy was to provide a framework for</p> <p>19 making decisions about the detention, or ongoing</p> <p>20 detention, of vulnerable people. The segregation policy</p> <p>21 was an operational issue.</p> <p>22 Q. But wasn't it important to know and to consider, when</p> <p>23 making detention decisions, that if mentally unwell</p> <p>24 detainees were being segregated, and that had particular</p> <p>25 risk of harm to them, that they -- that there should be</p> <p style="text-align: center;">Page 166</p>	<p>1 Q. Of course. So a sub-review was conducted into article 3</p> <p>2 cases. That found that there were certain common</p> <p>3 features to a number of those cases. The first was that</p> <p>4 serious mental illness had not been identified or</p> <p>5 treated. Were you aware of that?</p> <p>6 A. Not explicitly, no.</p> <p>7 Q. Secondly, the review found that, in a number of cases,</p> <p>8 there had been a deterioration in detention leading to</p> <p>9 severe mental illness. Were you aware of that?</p> <p>10 A. Again, I may well have been at the time, but I can't</p> <p>11 remember considering that at the time.</p> <p>12 Q. Importantly, Mr Johnson's review concluded that there</p> <p>13 were systemic issues as to a failure or breach of policy</p> <p>14 and that those features couldn't solely be ascribed to</p> <p>15 individual decision makers. Were you aware of that,</p> <p>16 that there was a systemic element?</p> <p>17 A. I'm not sure, to be honest. A systemic element in terms</p> <p>18 of decision makers --</p> <p>19 Q. In terms of failures or breaches of policy, not</p> <p>20 individual failures?</p> <p>21 A. I'm aware of the fact that, under the policy that</p> <p>22 existed at the time in respect of decisions on detention</p> <p>23 of vulnerable people, there was inconsistency of</p> <p>24 application because of the wording of the policy, and</p> <p>25 that was what the Adults at Risk policy was partly, at</p> <p style="text-align: center;">Page 168</p>

42 (Pages 165 to 168)

<p>1 least, designed to address. So, in terms of 2 inconsistency, certainly, yes, I was aware of that, but 3 systemic, I can't speak to that, I don't think. 4 Q. As you've mentioned in your witness statement at 5 paragraph 5, you were responsible for developing the 6 Home Office policy on operational decisions on whether 7 to detain, and to continue to detain, someone who was 8 considered to be vulnerable. Would that policy 9 development involve drawing on lessons learned from 10 casework experience? 11 A. Yes. I mean, certainly the development of the policy 12 involved operational colleagues and would have taken 13 into account the practicalities of decision making and 14 the experiences of decision making. 15 Q. Would the policy development also have included drawing 16 on lessons learned from previous litigation? 17 A. Obviously, we were keen not to develop a policy that 18 would fall foul of the law, and so the policy would have 19 been checked by lawyers to that effect. 20 Q. Would it have involved learning on lessons from 21 inspections by independent oversight bodies such as 22 HMIP, IMB or the ICIBI? 23 A. Yes, we would have been aware of most or if not all 24 things that would have had a relevance or a bearing on 25 it. So views of NGOs and views of external bodies.</p> <p style="text-align: center;">Page 169</p>	<p>1 responsibility for the operation of the policy that 2 preceded the Adults at Risk policy. But after the 3 Adults at Risk policy had been implemented, then if 4 I saw a case, I would go to the line managers. 5 Q. You say "if you saw a case"? 6 A. Yes. 7 Q. How would the case come to your attention? 8 A. There may be circumstances in -- well, there are two 9 circumstances, mainly, I think. First of all, if 10 a casework team was unsure about how to manage 11 a particular case, and especially in the early days of 12 the policy, they would come to my team for advice on, 13 for example, the level of the policy the individual 14 should be placed at, and there would be other 15 circumstances later on where we may be -- may have been 16 reviewing the management of cases -- to do audits of it, 17 for example -- in order to develop policy further, when 18 I would have seen cases that I would have kind of 19 questioned. 20 Q. Where there was a failure to implement policy or 21 a policy was wrongly construed, who is that information 22 fed back to? 23 A. Sorry, by me, you mean? 24 Q. Yes. Well, by who and to who? 25 A. Oh, I see. Well, it would depend. I mean, there were</p> <p style="text-align: center;">Page 171</p>
<p>1 Q. So you would have taken all of those things into account 2 when formulating the policy for the protection of 3 vulnerable detainees? 4 A. Yes, in the broadest sense, yes. 5 Q. In looking at some of those in a little more detail, 6 then, and how the policy was formulated, what process 7 was in place to feed back to individual decision makers 8 the findings of article 3 mistreatment by a court or 9 failures to implement policy lawfully leading to 10 unlawful detention? What was the process of feeding 11 those outcomes back to the people making the decisions? 12 A. Are you talking pre Adults at Risk policy or after that 13 was implemented? 14 Q. Well, pre or post? 15 A. I think the answer is going to be the same, actually. 16 Forgive me. All I can talk about is what I would have 17 done had I seen a case in which I felt that the 18 caseworker had dealt with it inappropriately, which is 19 to feed that back through either the line management 20 chain or through colleagues in immigration enforcement 21 who were overseeing implementation of the policy. 22 Q. Did you do that at the time? 23 A. Not pre Adults at Risk policy, because, from the moment 24 I stopped working on the Shaw review, I started working 25 on the Adults at Risk policy. So I had no</p> <p style="text-align: center;">Page 170</p>	<p>1 various caseworking areas in the Home Office, and still 2 are, I presume, and I had contacts in each of them at 3 a fairly senior level. So if I saw a case that gave me 4 pause, then I would speak to my contact in that area and 5 leave it to them to engage with the relevant casework 6 team. 7 Q. Were you taking proactive steps to make sure you were 8 aware of relevant cases? 9 A. There were, in each of the caseworking areas, individual 10 senior managers with responsibility for safeguarding 11 matters and responsibility for oversight and audit of 12 those -- the operation of the caseworking team would 13 fall to them. Sorry, I may have forgotten your 14 question. 15 Q. Were you taking proactive -- you said -- 16 A. Oh, I see. 17 Q. -- "I would bring it to the person's attention or the 18 manager's attention, if I was aware of the case"? 19 A. Yes. 20 Q. Were you taking proactive steps to make sure you were 21 aware of cases that were relevant to the detention 22 decisions in relation to vulnerable people? 23 A. Thanks for reminding me. Only -- no, no. I mean, 24 proactive in the terms of, was I actively seeking out 25 reports or detention reviews in order to assess them?</p> <p style="text-align: center;">Page 172</p>

43 (Pages 169 to 172)

<p>1 No. But, as I mentioned, subsequently, when we would</p> <p>2 have been developing the policy, we would have asked for</p> <p>3 a number of cases on a number of occasions. But that</p> <p>4 would have been for the purpose of developing policy</p> <p>5 rather than auditing the –</p> <p>6 Q. Yes. When you were there talking about cases, you're</p> <p>7 talking about internal casework within the Home Office?</p> <p>8 A. Yes.</p> <p>9 Q. I'm also asking about cases that have been through the</p> <p>10 courts, where a decision has been made, a judgment has</p> <p>11 been issued, which either has criticised an individual</p> <p>12 decision maker, or the decisions being made, or found</p> <p>13 a policy implementation to have been unlawful. How</p> <p>14 would you become aware of case law litigation through</p> <p>15 the courts of that nature?</p> <p>16 A. In the Home Office, there was a team, or a whole area,</p> <p>17 which – whose responsibility was to keep an eye on</p> <p>18 litigation, and they –</p> <p>19 Q. How did that feed into policy in relation to the</p> <p>20 detention of vulnerable people which you were</p> <p>21 responsible for?</p> <p>22 A. Because any litigation that related to my area of</p> <p>23 responsibility would be raised with me by the team that</p> <p>24 kept a weather eye on ongoing litigation.</p> <p>25 Q. Was there a formal process for doing that?</p> <p style="text-align: center;">Page 173</p>	<p>1 to this, I don't know, but when the Adults at Risk</p> <p>2 policy was implemented, we were immediately judicially</p> <p>3 reviewed by Medical Justice on the basis that the – on</p> <p>4 the basis of the definition of "torture" that we'd</p> <p>5 applied in the policy. I happened to be on jury service</p> <p>6 when that was happening, so I don't quite know how we</p> <p>7 got that information. But we were served with</p> <p>8 a pre-action protocol and the case went to court and an</p> <p>9 initial finding was made.</p> <p>10 So, obviously, my job then was to attend the hearing</p> <p>11 and respond to the interim judgment of Lord Justice</p> <p>12 Ouseley, as he was at the time, and take the necessary</p> <p>13 temporary action to address the judge's findings.</p> <p>14 Q. We might come to it in a little bit more detail later,</p> <p>15 but thank you.</p> <p>16 A. Sure.</p> <p>17 Q. Was there any process to inform and feed back court</p> <p>18 rulings to the people on the ground, whether that was</p> <p>19 G4S management or healthcare management, at all?</p> <p>20 A. If a judgment required us to change policy in any way,</p> <p>21 then we would have amended the policy documents and the</p> <p>22 Detention Services Orders if necessary, and they would</p> <p>23 have been usually disseminated to the healthcare staff</p> <p>24 and operational staff at immigration removal centres</p> <p>25 through Detention Services, which is part of Immigration</p> <p style="text-align: center;">Page 175</p>
<p>1 A. I mean, if I'm brutally honest, it kind of -- it felt</p> <p>2 semi-formal, in that I usually found out about</p> <p>3 litigation that was relevant to me, but it didn't</p> <p>4 necessarily always come in the same way. It was --</p> <p>5 Q. It was ad hoc?</p> <p>6 A. To a degree. I mean, I don't remember a time when we</p> <p>7 didn't hear about a piece of legislation -- litigation,</p> <p>8 sorry, that was relevant. But it didn't always come</p> <p>9 from the same person.</p> <p>10 Q. Was it then your responsibility to reflect on those</p> <p>11 matters and make any changes necessary to policy?</p> <p>12 A. Yes. But sometimes that could be a drawn-out process.</p> <p>13 Q. What about action against any particular individuals?</p> <p>14 Whose responsibility was it to follow up on that?</p> <p>15 I mean, for example, were disciplinary investigations</p> <p>16 ever carried out in relation to individual decision</p> <p>17 makers?</p> <p>18 A. I don't know. That would have been a matter for</p> <p>19 caseworking areas.</p> <p>20 Q. What about if a judgment found that a policy itself was</p> <p>21 unlawful or its implementation unlawful or contrary to</p> <p>22 parliamentary intent? What was the process for ensuring</p> <p>23 policy makers were informed of that type of failure? Is</p> <p>24 it the same process?</p> <p>25 A. Yes. So, as an example, and you may well be coming on</p> <p style="text-align: center;">Page 174</p>	<p>1 Removal Service.</p> <p>2 Q. So it wouldn't be the ruling itself, "There's been this</p> <p>3 court case", it would be, "Here's a new policy that's</p> <p>4 been changed, you need to act according to this one</p> <p>5 now"?</p> <p>6 A. Again, to take the torture example, we were required to</p> <p>7 revert to the previous definition of "torture", so the</p> <p>8 actions we took at that point were to call in all the</p> <p>9 cases that had been considered under the Adults at Risk</p> <p>10 policy between the implementation date of 12 September</p> <p>11 until the judgment, the interim judgment, and review all</p> <p>12 those cases. And, at the same time, immediately order</p> <p>13 caseworking teams to apply the judgment of Lord Justice</p> <p>14 Ouseley.</p> <p>15 Q. I see. Thank you. What about in relation to</p> <p>16 recommendations from inspections such as from the HMIP</p> <p>17 and IMB? How did -- what was the process for those</p> <p>18 feeding into Home Office policy, particularly in</p> <p>19 relation to the detention of vulnerable people?</p> <p>20 A. The usual process when a report such as an inspection</p> <p>21 report would be received would be for a certain member</p> <p>22 of staff, usually in the operational area, in the</p> <p>23 immigration enforcement, to assume responsibility for</p> <p>24 coordination of the Home Office response to the</p> <p>25 recommendations. Then that person would allocate</p> <p style="text-align: center;">Page 176</p>

44 (Pages 173 to 176)

<p>1 responsibility for each of the recommendations according</p> <p>2 to who had responsibility for them and then there would</p> <p>3 be a process of corporate consideration of</p> <p>4 the department's response to each of the individual</p> <p>5 recommendations.</p> <p>6 Q. How was the process -- what was the process for feedback</p> <p>7 back to you as to whether, as the person formulating</p> <p>8 policy and, therefore, presumably reviewing whether</p> <p>9 policies needed to be changed, from how it was operating</p> <p>10 on the ground? Was there a process by which you</p> <p>11 understood whether the policy was achieving its purpose</p> <p>12 and was operating effectively?</p> <p>13 A. Yes, I mean, we had very, very good communications and</p> <p>14 engagement with operational colleagues and colleagues</p> <p>15 who oversaw operational practices and processes, and so</p> <p>16 any requirement to change policy or consideration of</p> <p>17 a requirement to change policy would have been</p> <p>18 undertaken as a corporate operation, basically. So I,</p> <p>19 as a policy maker, would not be operating from a pure</p> <p>20 policy sense; I would be operating with full knowledge</p> <p>21 of what the operational position was, the operational</p> <p>22 needs and the operational situation.</p> <p>23 Q. You mentioned your operational colleagues. What was the</p> <p>24 department and what level of role was feeding back to</p> <p>25 you?</p> <p style="text-align: center;">Page 177</p>	<p>1 a yes, but my primary objective was to develop a policy</p> <p>2 that allowed for balanced decision making in respect of</p> <p>3 vulnerable people in immigration detention.</p> <p>4 Q. If we come, then, to the Shaw review recommendations</p> <p>5 that you were directly responsible for, and you say in</p> <p>6 your statement at paragraph 12 that they were primarily</p> <p>7 recommendations 9 to 16, and those recommendations were</p> <p>8 essentially the foundation of the Adults at Risk policy</p> <p>9 which was central to the Home Office response to the</p> <p>10 Shaw review, weren't they?</p> <p>11 A. Can I have a look at recommendations 9 to 16?</p> <p>12 Q. Yes, of course.</p> <p>13 A. Is it tab 3? I can't remember.</p> <p>14 Q. It may well be. It is also <INQ000060> at page 195.</p> <p>15 Perhaps we can have it on screen.</p> <p>16 A. So recommendations 9 to 16. The first few are -- well,</p> <p>17 some of them are about specific conditions. Other ones</p> <p>18 are more general.</p> <p>19 Q. So number 9, please?</p> <p>20 A. Number 9. So --</p> <p>21 Q. So here, as you say, there were some that related to</p> <p>22 specific categories of individuals. There we see</p> <p>23 victims of rape and other sexual or gender-based</p> <p>24 violence, at number 9. We can also see, at number 10,</p> <p>25 a presumptive exclusion from detention for pregnant</p> <p style="text-align: center;">Page 179</p>
<p>1 A. The grade, do you mean?</p> <p>2 Q. Yes.</p> <p>3 A. Forgive me if I can't remember the name of the unit, but</p> <p>4 there was a unit within immigration enforcement that was</p> <p>5 responsible for, if I remember correctly, oversight of</p> <p>6 the operation of the Adults at Risk policy by</p> <p>7 caseworkers. And our main contacts were there and they</p> <p>8 provided a kind of umbrella of all of the operational</p> <p>9 practices, in caseworking terms.</p> <p>10 Q. In relation to learning from things that had gone wrong,</p> <p>11 were you aware that there had been some cases previously</p> <p>12 where there had been coronial inquests into deaths in</p> <p>13 immigration detention that had made various findings of</p> <p>14 failures in relation to those who were mentally unwell</p> <p>15 and the management of them under ACDT as a management</p> <p>16 tool and failures in the rule 35 process? Were you</p> <p>17 aware of those at the time?</p> <p>18 A. I was aware that there had been cases of deaths in</p> <p>19 immigration detention. It wasn't something I was</p> <p>20 directly involved with.</p> <p>21 Q. Wasn't it important for you to know, in the formulation</p> <p>22 of the Adults at Risk policy, where something as</p> <p>23 critical as a death had occurred due to failures in</p> <p>24 safeguards for vulnerable people?</p> <p>25 A. I mean, to a degree, and in the broadest sense it's</p> <p style="text-align: center;">Page 178</p>	<p>1 women, and the recommendation was that the presumptive</p> <p>2 exclusion was replaced with an absolute exclusion.</p> <p>3 A. Yes.</p> <p>4 Q. We see at recommendation 11:</p> <p>5 "I recommend that the words 'which cannot be</p> <p>6 satisfactorily managed in detention' are removed from</p> <p>7 the section of the EIG that covers those suffering from</p> <p>8 serious mental illness."</p> <p>9 Recommendation 12:</p> <p>10 "I recommend that those with a diagnosis of</p> <p>11 post-traumatic stress disorder should be presumed</p> <p>12 unsuitable for detention."</p> <p>13 Those with learning difficulties -- over the page,</p> <p>14 please. Transsexual people. A recommendation that the</p> <p>15 wording in paragraph 55.10 of the EIG in respect of</p> <p>16 elderly people be tightened to include a specific upper</p> <p>17 age limit.</p> <p>18 And, at number 16, that a further clause should be</p> <p>19 added to the list in paragraph 55.10 of the EIG to</p> <p>20 reflect the dynamic nature of vulnerability and thus</p> <p>21 encompass "persons otherwise identified as being</p> <p>22 sufficiently vulnerable that their continued detention</p> <p>23 would be injurious to their welfare".</p> <p>24 If you also just come down to the one right at the</p> <p>25 bottom of the screen just now, recommendation 21:</p> <p style="text-align: center;">Page 180</p>

45 (Pages 177 to 180)

<p>1 "I recommend that the Home Office immediately 2 consider an alternative to the current rule 35 3 mechanism. This should include whether doctors 4 independent of the IRC system (for example, forensic 5 medical examiners) would be more appropriate to conduct 6 the assessments as well as the training implications." 7 And number 22 underneath, that rule 35 should be 8 applied to those detainees held in prisons as well as 9 IRCs. Do you see those? 10 A. I do. 11 Q. Although perhaps you weren't directly responsible for 12 the implementation of recommendations 21 and 22, rule 35 13 works in tandem with the Adults at Risk policy, doesn't 14 it? 15 A. Yeah, to a degree. I mean, it's the -- it's the only 16 statutory reporting mechanism from IRCs of people who 17 are vulnerable in any way. 18 Q. Were you aware, when the Shaw review and its findings 19 and recommendations were published, that the minister 20 publicly accepted the recommendations, promised to 21 reduce numbers of vulnerable people in detention and 22 promised improvements in the safeguards with a more 23 protective policy? 24 A. I think the minister used the term "accepted the broad 25 thrust of the recommendations".</p> <p style="text-align: center;">Page 181</p>	<p>1 consultation on a policy? 2 A. I think there may be -- in certain types of 3 consultation, there may be a kind of statutory 4 requirement. I may be wrong. But certain consultations 5 are given three months, I believe, for certain things. 6 Often, it's the case that, because there was a desire 7 not -- because there is a desire not to delay things, 8 that sometimes things are compressed, and so -- 9 Q. Do you think that happened here? 10 A. I think -- I can't remember the exact timescales. 11 I think we started working on the Adults at Risk policy 12 obviously around the time that Stephen Shaw reported, or 13 when the Home Office received the report, which was 14 a few months before it was published, and the Adults at 15 Risk policy went live in September 2016, I believe. 16 Q. So stakeholders who were consulted were required to 17 respond over the summer recess; is that right? 18 A. Well, I think -- as you will see from having read the 19 Adults at Risk policy, it is quite complex in many ways, 20 and the development of policy I found, in my experience, 21 is quite a long, drawn-out process, because there's an 22 awful lot that needs to be taken into account. You're 23 trying to, especially in the immigration area and the 24 Adults at Risk policy, you're trying to create 25 a delicate balance between immigration control and</p> <p style="text-align: center;">Page 183</p>
<p>1 Q. But the idea was to reduce numbers of vulnerable people 2 in detention? 3 A. Yes. 4 Q. And to improve the safeguards with a more protective 5 policy? 6 A. Absolutely. 7 Q. That was the aim of the Adults at Risk policy which you 8 implemented; is that right? 9 A. Indeed. 10 Q. So far as you're concerned, did the Adults at Risk 11 policy achieve that goal? 12 A. I think, in terms of reducing the number of vulnerable 13 people in detention, there may have been an unforeseen 14 result, in that, because we had effectively broadened 15 the scope of what it meant to be vulnerable, that had 16 the impact of actually increasing -- I can't remember 17 the data, but this is an impressionistic view that 18 I have from my time there. It may have been the case 19 that the number of people actually classified as 20 vulnerable, because of the broadening of the definition 21 of "vulnerability", effectively, meant that there were 22 more people who were classified as vulnerable than would 23 have been under the previous policy. 24 Q. Just dealing with the consultation on the Adults at Risk 25 policy, who sets the time period over which there is</p> <p style="text-align: center;">Page 182</p>	<p>1 protection of the vulnerable. And that is not an easy 2 task. It's very complex. And so the -- there were time 3 pressures to get it done and get it out there, and what 4 that meant, I think, possibly in practice, was that the 5 amount of time that stakeholders had to consider it was 6 compressed more than it may have been ideally. 7 Q. You would have been aware at the time that concerns were 8 being raised by, amongst others, Medical Justice before 9 the policy was implemented, that it didn't accurately 10 reflect Shaw's recommendations. Do you remember that 11 from the time? 12 A. I don't remember specifically Medical Justice's views, 13 but it would -- 14 Q. Do you remember concerns being raised that it didn't 15 reflect Shaw's recommendations? 16 A. Yeah. I mean, and when you look at it, it doesn't 17 reflect Shaw's recommendations because Mr Shaw didn't 18 recommend the Adults at Risk policy. He recommended 19 finessing of the existing policy, essentially. 20 Q. Yes. 21 A. But the Home Office decided to go down a different path. 22 Q. Yes. And so the policy that we see as the Adults at 23 Risk policy was implemented, despite it not reflecting 24 Shaw's recommendations and despite concerns raised at 25 the time about that?</p> <p style="text-align: center;">Page 184</p>

46 (Pages 181 to 184)

<p>1 A. Yes.</p> <p>2 Q. Can we just look at some of the concerns that were</p> <p>3 raised, then, and get your view upon them?</p> <p>4 A. Of course.</p> <p>5 Q. The Adults at Risk policy, as you have mentioned</p> <p>6 previously, briefly sought to narrow the definition of</p> <p>7 torture to state actors or with state complicity, which</p> <p>8 was not a recommendation of the Shaw review. Is that</p> <p>9 right?</p> <p>10 A. That's correct.</p> <p>11 Q. Narrowing the definition of who is a victim of torture</p> <p>12 isn't going to strengthen protections for vulnerable</p> <p>13 people, is it; it's going to reduce them?</p> <p>14 A. The reason we did that was that concerns had been raised</p> <p>15 by the operational business about the way in which the</p> <p>16 existing definition -- the EO casework -- litigation</p> <p>17 decision -- definition, sorry, was used. It was based</p> <p>18 on three limbs: severity, intent and purpose. What was</p> <p>19 happening is that there were many cases -- I hesitate to</p> <p>20 say "many", actually. There were certainly cases in</p> <p>21 which -- and I can give you an example of the sort of</p> <p>22 case, if that would be helpful.</p> <p>23 Q. Yes.</p> <p>24 A. So, for example, a common -- this is an indicative case</p> <p>25 rather than an actual case, but there were many cases</p> <p style="text-align: center;">Page 185</p>	<p>1 Q. No, go ahead, please.</p> <p>2 A. I think the view was taken that the type of harm that we</p> <p>3 were looking to address and capture in the definition of</p> <p>4 "torture" was more likely to have been carried out by</p> <p>5 a state actor.</p> <p>6 Q. But you accept that, on some occasions, it wasn't?</p> <p>7 A. Yes, and I also accept, of course, that Lord Justice</p> <p>8 Ouseley found that the definition we had applied was not</p> <p>9 appropriate, was unlawful. He did, however, say that it</p> <p>10 was perfectly reasonable for the Home Office to pursue</p> <p>11 a definition of torture that was different from the EO</p> <p>12 definition.</p> <p>13 Q. Does that attitude by the Home Office indicate an</p> <p>14 unwillingness to learn lessons from litigation, or</p> <p>15 something else?</p> <p>16 A. Are you talking about the litigation in respect of EO?</p> <p>17 Q. Yes. Is this an example of an unwillingness by the</p> <p>18 Home Office to learn lessons from litigation?</p> <p>19 A. I don't think I'd quite put it like that. I mean, the</p> <p>20 way I'd put it is that the Home Office had operated the</p> <p>21 EO definition for, at that point, what, three, four or</p> <p>22 five years, and, operationally, found that it was</p> <p>23 flawed, and so the Home Office sought to find</p> <p>24 a different way of approaching torture. I don't think</p> <p>25 that that necessarily represents ignoring the EO</p> <p style="text-align: center;">Page 187</p>
<p>1 like this, or a number of cases like this, where, for</p> <p>2 example, a farmer and another farmer had a dispute over</p> <p>3 land or over property or over livestock, and one farmer</p> <p>4 assaulted the other farmer. Now, that kind of situation</p> <p>5 may well have met the three limbs of the existing</p> <p>6 definition, in that it could well have been severe -- he</p> <p>7 could have cracked the fella's skull. There was</p> <p>8 certainly intent, because the person meant to do it.</p> <p>9 And there was a reason, punishment, for doing it. So it</p> <p>10 met the three limbs. So in legal terms, that met the</p> <p>11 definition of torture.</p> <p>12 But the view the Home Office took was that it didn't</p> <p>13 actually amount to an act of torture, and so the</p> <p>14 Home Office was seeing a number of cases where that was</p> <p>15 the situation. So the view was taken that, by employing</p> <p>16 the formulation of an -- an action by a state agent or</p> <p>17 on behalf of a state agent, that would cut out that kind</p> <p>18 of case from the definition.</p> <p>19 Q. But the concern being raised was that the risk of harm</p> <p>20 in detention to someone who has been the subject of</p> <p>21 torture is not defined by who the perpetrator is, but,</p> <p>22 as you say, under the test, by the nature of the abuse</p> <p>23 against them?</p> <p>24 A. Yes. I mean, I think the view -- sorry, I didn't mean</p> <p>25 to interrupt you.</p> <p style="text-align: center;">Page 186</p>	<p>1 judgment, but trying to find a better way of doing it.</p> <p>2 Q. Looking, then, at a different aspect of concerns raised</p> <p>3 with you about the Adults at Risk policy, the policy</p> <p>4 effectively moved away from the category-based approach</p> <p>5 to the assessment of vulnerability and replaced it with</p> <p>6 indicators of risk and evidence levels, didn't it?</p> <p>7 A. It did, but I don't think that that represents a moving</p> <p>8 away from the category-based approach, because the</p> <p>9 policy clearly set out the categories of individuals who</p> <p>10 would be regarded as vulnerable.</p> <p>11 Q. But they were categories of individuals who were</p> <p>12 indicated to be at risk, weren't they?</p> <p>13 A. Yes.</p> <p>14 Q. And then what was then required was evidence levels at</p> <p>15 levels 1, 2 or 3 of independent evidence; that's right,</p> <p>16 isn't it?</p> <p>17 A. Level 1 wouldn't have been independent evidence. That</p> <p>18 was self-declaration.</p> <p>19 Q. Self-declaration. Levels 2 and 3?</p> <p>20 A. Yes.</p> <p>21 Q. Level 1 not usually resulting in release from detention?</p> <p>22 A. No --</p> <p>23 Q. Whereas the other two may do?</p> <p>24 A. The principle was that the higher the level of evidence</p> <p>25 of risk, the more compelling the immigration factors</p> <p style="text-align: center;">Page 188</p>

47 (Pages 185 to 188)

<p>1 would have to be in order to justify detention. This is</p> <p>2 all, you know, based on first principles of detention,</p> <p>3 that detention should only be used for the purposes</p> <p>4 of -- if it was necessary in order to effect removal and</p> <p>5 that, under the Hardial Singh principle, it should be</p> <p>6 only if there is a realistic prospect of removal within</p> <p>7 a reasonable timescale.</p> <p>8 Q. This wasn't in accordance with Shaw's recommendations,</p> <p>9 though, was it, because what he had recommended was</p> <p>10 keeping the categories, but effectively adding to</p> <p>11 them --</p> <p>12 A. Yes.</p> <p>13 Q. -- further categories of vulnerability, and we went</p> <p>14 through some of them -- PTSD, pregnant women, learning</p> <p>15 disabilities, et cetera.</p> <p>16 A. Yes.</p> <p>17 Q. Under the categories-based approach, people who fell</p> <p>18 within those categories were presumed to be inherently</p> <p>19 unsuitable for detention due to their vulnerabilities,</p> <p>20 weren't they?</p> <p>21 A. They were held to be unsuitable for detention other than</p> <p>22 in very exceptional circumstances.</p> <p>23 Q. Yes, in very exceptional circumstances. Those</p> <p>24 categories of people unsuitable for detention were</p> <p>25 consistent with what Professor Bosworth had found in her</p> <p style="text-align: center;">Page 189</p>	<p>1 be something that caseworkers would be able to apply in</p> <p>2 a much more uniform way.</p> <p>3 Q. Concerns were certainly raised with you about the move</p> <p>4 away from category-based -- the category-based approach</p> <p>5 to an indicators of risk plus evidence of harm, though,</p> <p>6 weren't they, and that that effectively went back to</p> <p>7 a practice of whether someone could be satisfactorily</p> <p>8 managed within detention. Do you agree with that?</p> <p>9 A. Yeah, I think so. I mean, the "satisfactorily managed"</p> <p>10 issue is interesting, because the EIG 55.10 referred to</p> <p>11 "satisfactorily managed" in respect of people with</p> <p>12 mental health conditions and physical health conditions.</p> <p>13 We actually removed that from the formulation, to</p> <p>14 a degree, in the Adults at Risk policy, but I was</p> <p>15 reminded this morning, when I read the document that was</p> <p>16 provided to me this morning, which was the 2016 version</p> <p>17 of the caseworker guidance, that it was kind of still</p> <p>18 there but in another form.</p> <p>19 Q. Yes.</p> <p>20 A. And so -- I mean, I have to kind of agree with you, that</p> <p>21 it wasn't removed.</p> <p>22 Q. Yes, and wasn't the concern about that that it</p> <p>23 perpetuated a "wait and see" approach in relation to</p> <p>24 harm, such that harm would then actually be caused to</p> <p>25 vulnerable detainees in detention, rather than routing</p> <p style="text-align: center;">Page 191</p>
<p>1 sub-review, which was accepted by the Home Office; would</p> <p>2 you agree?</p> <p>3 A. I believe so, yes.</p> <p>4 Q. So requiring evidence of harm, then, goes against the</p> <p>5 principle that the categories of people are inherently</p> <p>6 at risk of harm in detention and shouldn't be detained,</p> <p>7 doesn't it? It provides an extra hurdle?</p> <p>8 A. I'm not sure that it does, because, as I said, the</p> <p>9 categories -- in fact, an enhanced list of categories,</p> <p>10 in line with Mr Shaw's comments, and going further, in</p> <p>11 fact, for example, in the case of individuals with</p> <p>12 mental health conditions, where the previous category</p> <p>13 referred to people with serious mental health conditions</p> <p>14 and the Adults at Risk policy referred to any mental</p> <p>15 health condition. I think the category-based approach</p> <p>16 was maintained in the Adults at Risk policy, but the</p> <p>17 policy was -- I mean, the purpose of the policy was to</p> <p>18 address -- or one of the purposes was to address the</p> <p>19 fact that the "very exceptional circumstances"</p> <p>20 formulation was vague and was subject to inconsistent</p> <p>21 application across the Home Office, and so we were</p> <p>22 looking to put in place a policy which achieved the</p> <p>23 balance between immigration control and vulnerability,</p> <p>24 but was -- I know it is, in some respects, an inherently</p> <p>25 complex policy, but the overall effect was designed to</p> <p style="text-align: center;">Page 190</p>	<p>1 them out of detention because they were inherently</p> <p>2 likely to suffer harm because of the category that they</p> <p>3 were in?</p> <p>4 A. I'm not sure I quite understand. Are you relating that</p> <p>5 to the "satisfactorily managed" formulation?</p> <p>6 Q. Yes.</p> <p>7 A. I'm not quite sure I see the connection there, to be</p> <p>8 honest.</p> <p>9 Q. If there was a connection, that is certainly the</p> <p>10 opposite of what Shaw was trying to achieve, wasn't it?</p> <p>11 He was trying to route vulnerable people out of</p> <p>12 detention to ensure that harm wasn't caused to them by</p> <p>13 protecting them with safeguards. Would you agree with</p> <p>14 that?</p> <p>15 A. Well, Mr Shaw's recommendations in respect of the policy</p> <p>16 were -- well, yes, I mean, I can't disagree with that,</p> <p>17 yes, sorry.</p> <p>18 Q. In terms of that move away from the category approach,</p> <p>19 to the extent that it was, in that there was now an</p> <p>20 indicators of risk coupled with evidence of harm and</p> <p>21 this satisfactory management criteria retained in some</p> <p>22 form, whose decision was that? Was that your decision</p> <p>23 or did it come from elsewhere in the Home Office?</p> <p>24 A. I was responsible for holding the pen on the policy, but</p> <p>25 it was developed in conjunction with a range of</p> <p style="text-align: center;">Page 192</p>

48 (Pages 189 to 192)

<p>1 colleagues across the Home Office, both operational and</p> <p>2 policy decisions. I mean, the Adults at Risk policy was</p> <p>3 a statutory policy. There was a requirement in the 2016</p> <p>4 Immigration Act for the Home Secretary to publish</p> <p>5 guidance on the management of Adults at Risk in</p> <p>6 immigration detention. The statutory guidance was in</p> <p>7 line with that and that would have been signed off by</p> <p>8 ministers.</p> <p>9 Q. If we just look then, briefly, at rules 34 and 35 that</p> <p>10 work somewhat in conjunction with the Adults at Risk</p> <p>11 policy, were you aware at the time that rules 34 and 35</p> <p>12 are required to work together as key safeguards such</p> <p>13 that a rule 34 examination within 24 hours of a detainee</p> <p>14 arriving in an IRC can result in a rule 35 report, and</p> <p>15 indeed should, in appropriate circumstances?</p> <p>16 A. Yes, I'm aware of the connection between rule 34 and</p> <p>17 rule 35. I think -- well, I'll say that I was aware of</p> <p>18 the fact that issues raised at a rule 34 appointment</p> <p>19 could potentially lead to a rule 35 appointment.</p> <p>20 Q. And they should, if one was indicated, shouldn't they,</p> <p>21 because the importance of those two rules working</p> <p>22 together is to identify people who are vulnerable to</p> <p>23 risk of harm in detention at the outset of their</p> <p>24 detention; that's right, isn't it?</p> <p>25 A. I mean, my impression of rule 34 was that it was partly</p> <p style="text-align: center;">Page 193</p>	<p>1 provision under rule 34 and rule 35 to -- for that to</p> <p>2 come out at the outset of detention?</p> <p>3 A. I don't recall that.</p> <p>4 Q. If that is right, that would certainly mean that it's</p> <p>5 crucial that rules 34 and 35 are acting in conjunction</p> <p>6 at that time, at the outset of detention, wouldn't it?</p> <p>7 A. So could you tell me again what the Home Office said?</p> <p>8 Q. The Home Office had opposed the existence of a duty to</p> <p>9 undertake medical screening for torture before</p> <p>10 detention, so that screening wasn't carried out before</p> <p>11 someone went into detention, which makes the safeguard</p> <p>12 at the outset of detention under rules 34 and 35 all the</p> <p>13 more important, doesn't it?</p> <p>14 A. Are you talking about in asylum cases?</p> <p>15 Q. In detention cases. In those going into detention?</p> <p>16 A. But you mentioned before detention.</p> <p>17 Q. Yes, prior to detention.</p> <p>18 A. But whilst an individual was being considered for</p> <p>19 detention, you mean?</p> <p>20 Q. Well, before a person comes into detention, no screening</p> <p>21 is undertaken to ascertain --</p> <p>22 A. Oh, I see.</p> <p>23 Q. -- whether they should be detained at all because they</p> <p>24 are a victim of torture, and the reason the Home Office</p> <p>25 felt able to do that was by relying upon rule 34 and</p> <p style="text-align: center;">Page 195</p>
<p>1 about that, but also partly about identifying whether an</p> <p>2 individual had particular needs in detention.</p> <p>3 Q. Yes. Certainly that in addition, but it was an</p> <p>4 important safeguard to ensure that the Home Office were</p> <p>5 notified about vulnerabilities in relation to a detainee</p> <p>6 at the outset of their detention, so they could factor</p> <p>7 those into their decisions as to whether to detain the</p> <p>8 person at all, weren't they?</p> <p>9 A. Well, I would have -- I think detention reviews were</p> <p>10 carried out at fairly frequent intervals, certainly at</p> <p>11 the start of detention. But --</p> <p>12 Q. But in the appropriate case, this should have been the</p> <p>13 first time, shouldn't it, as a result of that</p> <p>14 appointment?</p> <p>15 A. I would have expected, if concerns were identified by</p> <p>16 the member of medical staff carrying out the rule 34</p> <p>17 appointment, if they had concerns, they would refer</p> <p>18 them -- refer the individual for either a rule 35 report</p> <p>19 or would have notified the Home Office through other</p> <p>20 needs if the concerns didn't fall within the scope of</p> <p>21 rule 35 and for that to trigger a review under the</p> <p>22 Adults at Risk policy.</p> <p>23 Q. Were you aware that the Home Office had effectively</p> <p>24 opposed the existence of a duty to undertake medical</p> <p>25 screening for torture before detention because there was</p> <p style="text-align: center;">Page 194</p>	<p>1 rule 35 acting in conjunction at the outset of</p> <p>2 detention. Were you aware of that --</p> <p>3 MR BLAKE: Chair, sorry to intervene here, I'm not aware of</p> <p>4 where that allegation comes from. It may well exist but</p> <p>5 perhaps the witness can be taken to where the allegation</p> <p>6 comes from so he can have the context?</p> <p>7 MS SIMCOCK: I will move on and, if necessary, we can come</p> <p>8 back to it following this witness's evidence.</p> <p>9 In relation to rule 35, when the Adults at Risk</p> <p>10 policy was brought in, there were no amendments made to</p> <p>11 the rule 35 Detention Centre Rules, were there?</p> <p>12 A. No.</p> <p>13 Q. We heard from doctors, and indeed healthcare management</p> <p>14 and from Medical Justice, from their experience of</p> <p>15 casework that the rule 34 assessment was routinely not</p> <p>16 leading to a rule 35 report, even where disclosures had</p> <p>17 been made, and that a further appointment needed to be</p> <p>18 booked for rule 35, sometimes with delays in that</p> <p>19 appointment. Were you aware of that process at the time</p> <p>20 of formulating the Adults at Risk policy?</p> <p>21 A. I don't remember being expressly aware of that.</p> <p>22 Q. Medical Justice had been raising those types of concerns</p> <p>23 with the Home Office for several years before the Adults</p> <p>24 at Risk policy was implemented and, indeed, after it was</p> <p>25 implemented. You weren't aware of that at the time?</p> <p style="text-align: center;">Page 196</p>

49 (Pages 193 to 196)

<p>1 A. I don't recall.</p> <p>2 Q. That's a concern, isn't it, if part of the safeguards</p> <p>3 for vulnerable people in being picked up is rule 34 and</p> <p>4 rule 35 at the outset of detention, in the absence of</p> <p>5 a screening tool prior to detention? If that assessment</p> <p>6 isn't being made until some days, or even weeks,</p> <p>7 afterwards, that would be concerning, wouldn't it?</p> <p>8 A. It could be potentially, yes.</p> <p>9 Q. Because it would be delaying the identification of</p> <p>10 particularly vulnerable people likely to be harmed by</p> <p>11 detention?</p> <p>12 A. Yeah. I mean, we were keen for individuals with</p> <p>13 vulnerabilities to be picked up as early as possible, of</p> <p>14 course.</p> <p>15 Q. In relation to rule 35, were you aware that the system</p> <p>16 under rules 35(1) and (2) wasn't operating effectively</p> <p>17 in the relevant period or indeed afterwards, in that</p> <p>18 there were very, very few rule 35(1) reports carried out</p> <p>19 and no rule 35(2) reports at all?</p> <p>20 A. I am pretty sure I would have had access to data on the</p> <p>21 number of reports. I don't know whether I would have</p> <p>22 seen the data in respect of the relevant period at the</p> <p>23 time. I honestly don't know. But obviously I've seen</p> <p>24 it now. And, I mean, I think there's a couple of issues</p> <p>25 here. I mean, with rule 35(1), I believe there were two</p> <p style="text-align: center;">Page 197</p>	<p>1 complete -- would add that information on to the</p> <p>2 rule 35(3) report.</p> <p>3 Now, as far as I was concerned, certainly, and I --</p> <p>4 well, I have seen something that suggested that the</p> <p>5 Home Office policy was that there should be separate</p> <p>6 reports. I mean, I think that was a bit of a grey area.</p> <p>7 The important thing for me was that the information was</p> <p>8 received by the Home Office and my expectation would be</p> <p>9 that -- and I know some very, very good IRC doctors who</p> <p>10 used the rule 35(3) report as a means of reporting on</p> <p>11 rule 35(1) as well, and my expectation would have been</p> <p>12 that, had a caseworker received a rule 35(3) report that</p> <p>13 went on to say the individual's health is likely to</p> <p>14 suffer, they would have placed that individual at</p> <p>15 level 3 of the Adults at Risk policy.</p> <p>16 Q. Dr Oozeerally gave some evidence that he had raised</p> <p>17 concerns with the Home Office that rule 35 wasn't</p> <p>18 working, and he, in his witness statement, certainly</p> <p>19 mentioned conversations he had with you in particular.</p> <p>20 Do you remember the content of those conversations?</p> <p>21 A. Well, no. I mean, I've kind of been partly reminded by</p> <p>22 having seen Dr Oozeerally's evidence on Friday. My</p> <p>23 recollection is that Dr Oozeerally was present at</p> <p>24 a training session I and a colleague from the</p> <p>25 immigration enforcement delivered at Brook House.</p> <p style="text-align: center;">Page 199</p>
<p>1 reports in the period.</p> <p>2 Q. There were eight reports in 2017.</p> <p>3 A. Eight.</p> <p>4 Q. And no rule 35(2) reports.</p> <p>5 A. None.</p> <p>6 Q. None.</p> <p>7 A. Rule 35(1) obviously requires -- I can't remember the</p> <p>8 exact wording, but it requires doctors to report of</p> <p>9 cases where the individual's health is likely to suffer</p> <p>10 in detention, along those lines.</p> <p>11 Q. Exactly.</p> <p>12 A. I think what was happening was that the vast majority of</p> <p>13 people who sought a rule 35 report or were identified as</p> <p>14 being -- being the subject of a rule 35 report were</p> <p>15 claiming to have been tortured, and I believe that there</p> <p>16 were different practices among doctors, among different</p> <p>17 immigration removal centres, where some, if they were</p> <p>18 presented with someone who had claimed torture and they</p> <p>19 considered that the individual may have been a victim of</p> <p>20 torture, which is the threshold --</p> <p>21 Q. They would do a rule 35(3) report.</p> <p>22 A. They would do a rule 35(3) report. Now, if the doctor</p> <p>23 further considered that the individual's health was</p> <p>24 likely to suffer in detention, some would complete</p> <p>25 a separate rule 35(1) report, whereas others would</p> <p style="text-align: center;">Page 198</p>	<p>1 I think it was in October 2017. I may have the date</p> <p>2 wrong. And at the end of the session, Dr Oozeerally and</p> <p>3 I had a conversation. He came up to me and suggested</p> <p>4 that he had some ideas for improving the system.</p> <p>5 Subsequently, we had email exchanges, and I attended</p> <p>6 a meeting with Dr Oozeerally and Dr Chaudhary along with</p> <p>7 some Home Office colleagues -- I don't know when that</p> <p>8 was; it was in the Home Office -- in which he expanded</p> <p>9 on his ideas and sought Home Office buy-in.</p> <p>10 As I say, I can't remember in detail what the ideas</p> <p>11 were. I think they were about separating out the</p> <p>12 therapeutic functions of doctors from the reporting</p> <p>13 functions and maybe having an independent medical</p> <p>14 assessment within the Home Office.</p> <p>15 Q. Were you aware at the time of the low numbers of both of</p> <p>16 those levels of report?</p> <p>17 A. I may have been. I don't know.</p> <p>18 Q. If you were aware, would it have been a concern to you</p> <p>19 in the formulation of this policy that those two limbs</p> <p>20 of the rule weren't being used as required?</p> <p>21 A. Not expressly, because I think -- I would have assumed</p> <p>22 that the absence of rule 35(1) reports was because</p> <p>23 people were using rule 35(3) reports to report</p> <p>24 rule 35(1)s, effectively, and, as far as rule 35(2) was</p> <p>25 concerned, I was aware that the ACDT process had</p> <p style="text-align: center;">Page 200</p>

50 (Pages 197 to 200)

<p>1 effectively -- well, ran alongside rule 35(2) but had in</p> <p>2 some ways kind of replaced the reporting need because</p> <p>3 Part Cs were used to report cases of suicide and</p> <p>4 self-harm, of suicidal ideation and self-harm, and that</p> <p>5 any conversation needed by caseworkers to consider cases</p> <p>6 under the Adults at Risk policy would be getting through</p> <p>7 through Part Cs or by other communication methods.</p> <p>8 I think it is also important to remember that suicidal</p> <p>9 ideation and acts of self-harm does not in itself fall</p> <p>10 within the Adults at Risk policy, although it may be</p> <p>11 indicative that an individual is suffering from a mental</p> <p>12 health condition, and an act of self-harm or attempted</p> <p>13 suicide may lead to serious physical health conditions</p> <p>14 which will bring someone within the scope of the policy.</p> <p>15 Q. Do you agree that there seems to be something of</p> <p>16 a disconnect between rule 35, particularly under limbs</p> <p>17 (1) and (2), particularly, for example, where someone</p> <p>18 isn't a victim of torture but falls within those rules,</p> <p>19 and the Adults at Risk policy?</p> <p>20 A. I guess to a degree, and I think, you know, from what</p> <p>21 I've been reading over the past couple of weeks, the</p> <p>22 number of --</p> <p>23 Q. It seems to be the case that there's still a disconnect?</p> <p>24 A. The number of rule 35(1) reports does give pause for</p> <p>25 thought, if nothing else.</p> <p style="text-align: center;">Page 201</p>	<p>1 can be satisfactorily managed in detention, doesn't it?</p> <p>2 A. I suppose that's one way of looking at it, but it's also</p> <p>3 considering whether it's actually more dangerous to</p> <p>4 release someone than it is to keep them in detention.</p> <p>5 I'm not for a second suggesting that it's preferable to</p> <p>6 keep someone in detention rather than release them.</p> <p>7 Q. Yes. But doesn't --</p> <p>8 A. But it does -- sorry. It does mean that special</p> <p>9 considerations would have to be put in place to ensure</p> <p>10 the safeguarding of the individual on release.</p> <p>11 Q. But doesn't it also encourage a higher threshold for the</p> <p>12 completing of a rule 35(1) report? Because it</p> <p>13 encourages you to say, "Well, I don't need to make one</p> <p>14 if they can be satisfactorily managed in detention"?</p> <p>15 A. I must confess, I hadn't considered that before, but</p> <p>16 I suppose it does.</p> <p>17 Q. Similarly, the rule 35(2) template says -- rule 35(2)</p> <p>18 says that concerns should be raised where there's</p> <p>19 a suspicion of suicidal intentions. That's a relatively</p> <p>20 low threshold, would you agree?</p> <p>21 A. Yes.</p> <p>22 Q. There is no requirement in the rule to consider whether</p> <p>23 those suicidal intentions or risk of suicide can be</p> <p>24 managed in detention. That doesn't appear in the rule</p> <p>25 itself, does it?</p> <p style="text-align: center;">Page 203</p>
<p>1 Q. Yes. In relation to the template that one has to fill</p> <p>2 in under rule 35(1), were you involved with, or</p> <p>3 responsible for, the development of the rule 35</p> <p>4 templates?</p> <p>5 A. No, I don't think so. I think rule 35 had been in place</p> <p>6 since 2001. I'm not sure about the development of</p> <p>7 the templates, but I don't think I was involved. I was</p> <p>8 later on, when we were considering amending the rule --</p> <p>9 the rule 35 process, in my last months in the</p> <p>10 Home Office.</p> <p>11 Q. The template in relation to rule 35(1) asks whether</p> <p>12 remedial action can be taken to minimise the risks to</p> <p>13 health in detention, at section 5(2). That, again,</p> <p>14 forms part of re-introducing whether ill-health can</p> <p>15 satisfactorily be managed in detention, doesn't it?</p> <p>16 A. I never really thought very much about that, but the way</p> <p>17 you say it, I suppose so, yes.</p> <p>18 Q. It's certainly clear that that's how the doctors in</p> <p>19 Brook House were applying it, from Dr Oozeerally and</p> <p>20 Dr Chaudhary's evidence.</p> <p>21 In relation to the template at section 5(4), there's</p> <p>22 a further question about whether release will adversely</p> <p>23 impact on detainee health as compared to treatment</p> <p>24 available in detention. That, again, brings in</p> <p>25 whether -- encourages consideration of whether someone</p> <p style="text-align: center;">Page 202</p>	<p>1 A. No.</p> <p>2 Q. Why, then, does the template ask about satisfactory</p> <p>3 management of suicide risk and refer to management on an</p> <p>4 ACDT?</p> <p>5 A. Presumably, in order to ensure that the right care is</p> <p>6 being given to the individual, but I don't know. I'm</p> <p>7 speculating.</p> <p>8 Q. Again, doesn't that encourage consideration of whether</p> <p>9 someone who has suicidal intentions can be managed in</p> <p>10 detention and, therefore, there's no need to complete</p> <p>11 a rule 35(2) report?</p> <p>12 A. I suppose that could be one way of interpreting it.</p> <p>13 Q. We heard some evidence that the GPs, particularly in</p> <p>14 Brook House but potentially wider than that, had come to</p> <p>15 the view that it was acceptable to communicate concerns</p> <p>16 about detainees' vulnerabilities, including self-harm or</p> <p>17 suicidal intentions, through Part C, instead of rule 35.</p> <p>18 Was that something you were aware of at the time you</p> <p>19 formulated the Adults at Risk policy?</p> <p>20 A. I can't remember it explicitly, but certainly I would</p> <p>21 have been operating and we would have been operating in</p> <p>22 the knowledge that rule 35 was limited in terms of</p> <p>23 the categories of vulnerability that could be reported</p> <p>24 under it, and so I certainly would have been aware of</p> <p>25 the fact that Part C and other less formal or more</p> <p style="text-align: center;">Page 204</p>

51 (Pages 201 to 204)

<p>1 formal communications from doctors to caseworkers would</p> <p>2 have been needed in order to allow for the reporting of</p> <p>3 other vulnerabilities, and I was -- I think I was</p> <p>4 satisfied that that was in place.</p> <p>5 Q. Part C was certainly being used. Was Part C encouraged</p> <p>6 by the Home Office as an alternative to using rule 35?</p> <p>7 A. I don't think I'd go as far as saying actively</p> <p>8 encouraged or discouraged, but it was --</p> <p>9 Q. It was known about?</p> <p>10 A. It was known about, yes, and it was simply a means of</p> <p>11 healthcare staff in IRCs reporting vulnerabilities to</p> <p>12 the Home Office.</p> <p>13 Q. But including where someone's health was being harmed as</p> <p>14 a result of detention and also where someone was</p> <p>15 suicidal, but without the accompanying rule 35 report?</p> <p>16 A. Yeah. I mean, I can't explain -- and I don't know</p> <p>17 whether this was the case -- why a rule -- sorry,</p> <p>18 a Part C would be used in lieu of a rule 35(1) report,</p> <p>19 but I can understand totally why a rule 35(3) would be</p> <p>20 used to report rule 35(1) concerns.</p> <p>21 Q. Thank you. Moving on, then, if we just look at mental</p> <p>22 capacity. You were responsible for, at least involved</p> <p>23 in, the drafting of the DSO04 2020 on mental</p> <p>24 vulnerability, I think, from paragraph 16 of your</p> <p>25 statement?</p> <p style="text-align: center;">Page 205</p>	<p>1 be very, very complex, and it took us some time to</p> <p>2 actually get that in place. In tandem with that, we</p> <p>3 were looking at arrangements for an advocacy system,</p> <p>4 which I think we accepted was -- certainly when I was</p> <p>5 there, I don't know if things have changed since then,</p> <p>6 but I think we accepted that that was kind of a key part</p> <p>7 of this.</p> <p>8 At the time at which we were ready to publish the</p> <p>9 DSO, when we'd just about sorted out the arrangements or</p> <p>10 proposed arrangements for identifying and supporting</p> <p>11 individuals who lacked capacity in detention, we hadn't</p> <p>12 quite got there in terms of the advocacy process. There</p> <p>13 were all sorts of logistical issues. There wasn't, for</p> <p>14 example, a kind of off-the-peg advocacy service that we</p> <p>15 could utilise. So at the time I left, that work was</p> <p>16 still ongoing.</p> <p>17 But the view we took was that, given that we were</p> <p>18 ready with the DSO on identification and support, we</p> <p>19 should press ahead with that so that that was -- because</p> <p>20 we were coming under pressure from the courts to get</p> <p>21 this in place.</p> <p>22 Q. So despite the gap remaining --</p> <p>23 A. Yes.</p> <p>24 Q. -- and it potentially still leading to vulnerable people</p> <p>25 not being able to participate in the decisions about</p> <p style="text-align: center;">Page 207</p>
<p>1 A. Yes.</p> <p>2 Q. This was the DSO that was drafted in response to the</p> <p>3 ruling of the Court of Appeal in the case of VC. Were</p> <p>4 you aware of that?</p> <p>5 A. Yes.</p> <p>6 Q. In that case, the court had found a breach of</p> <p>7 the Equality Act duties by the Home Office and</p> <p>8 discrimination against vulnerable detainees on the</p> <p>9 grounds of disability because no adequate measures were</p> <p>10 in place to ensure that those who may lack mental</p> <p>11 capacity were not at a disadvantage in relation to their</p> <p>12 ability to participate in decisions relating to</p> <p>13 detention and removal from association under rule 40.</p> <p>14 Is that right?</p> <p>15 A. I think so, yes.</p> <p>16 Q. The inquiry heard some evidence that, in fact, following</p> <p>17 that litigation, the gap, effectively, hasn't been</p> <p>18 plugged and concerns are still being raised by those</p> <p>19 such as Medical Justice because of the lack of</p> <p>20 independent advocacy assistance for detainees who may</p> <p>21 lack capacity.</p> <p>22 A. Yes.</p> <p>23 Q. Do you have any comment upon why that is?</p> <p>24 A. I can't remember when the judgment was, but we found the</p> <p>25 production of guidance, the Detention Services Order, to</p> <p style="text-align: center;">Page 206</p>	<p>1 their detention and removal from association, the DSO</p> <p>2 was published?</p> <p>3 A. Yes.</p> <p>4 Q. And the gap remains?</p> <p>5 A. Well, until such time as it could be plugged. I mean,</p> <p>6 I can't speak to --</p> <p>7 Q. I understand you've retired.</p> <p>8 A. -- what's happened since I retired, but that work was</p> <p>9 ongoing at the time.</p> <p>10 Q. You say in your statement you didn't have a role in</p> <p>11 developing DSOs or policies concerning food and fluid</p> <p>12 refusal; is that right?</p> <p>13 A. That's correct.</p> <p>14 Q. But isn't that a policy that's relevant to Adults at</p> <p>15 Risk and the Adults at Risk policy?</p> <p>16 A. In the same way as self-harm and attempted suicide are</p> <p>17 not, in themselves, part of the Adults at Risk policy,</p> <p>18 the same consideration applies to food and fluid refusal</p> <p>19 and also to substance misuse, in that, again, they may</p> <p>20 be indicative of a mental health problem and they may</p> <p>21 lead on to a serious physical health condition, but --</p> <p>22 and I can explain the reasoning for that, if it would be</p> <p>23 helpful?</p> <p>24 Q. Briefly, given the time.</p> <p>25 A. It will be very brief. It's that those -- those</p> <p style="text-align: center;">Page 208</p>

52 (Pages 205 to 208)

<p>1 conditions, for want of a better expression, we did not</p> <p>2 want to promote in any way by -- all of the indicators</p> <p>3 in the Adults at Risk policy are conditions that people</p> <p>4 experience or suffer from. We did not want to have any</p> <p>5 activity in the Adults at Risk policy that could</p> <p>6 incentivise an individual to harm themselves,</p> <p>7 essentially.</p> <p>8 Q. I see.</p> <p>9 A. I know not everybody would agree with that view, but</p> <p>10 that's the view we took.</p> <p>11 Q. Thank you. In relation to segregation, then, again,</p> <p>12 briefly, the Shaw review had found a systemic misuse of</p> <p>13 segregation on mentally unwell people and expressed some</p> <p>14 concern about that, and Medical Justice have certainly</p> <p>15 given evidence that segregation is known to be harmful</p> <p>16 to those people who are mentally unwell. Would you</p> <p>17 agree with that?</p> <p>18 A. I wouldn't disagree.</p> <p>19 Q. You had no involvement in the formulation of the rule 40</p> <p>20 or rule 42 policy, did you?</p> <p>21 A. No, I didn't.</p> <p>22 Q. Again, why isn't consideration given to the connection</p> <p>23 between use of segregation and the Adults at Risk</p> <p>24 policy? It seems to be, again, that there's</p> <p>25 a disconnect?</p> <p style="text-align: right;">Page 209</p>	<p>1 A. That's correct.</p> <p>2 Q. We heard from Medical Justice and Freedom from torture</p> <p>3 about some concerns that they have in relation to those</p> <p>4 reforms as being potentially regressive and reducing</p> <p>5 rather than promoting the protection of vulnerable</p> <p>6 detainees. Do you have any particular comment about</p> <p>7 that?</p> <p>8 A. Well, I could talk to all three of them, but if you have</p> <p>9 specific questions.</p> <p>10 Q. Yes. I will go, then, to some of the detail of each</p> <p>11 one. So we heard evidence about the medico-legal</p> <p>12 reports' quality standards and that where a report</p> <p>13 doesn't meet those standards, it's effectively</p> <p>14 disregarded, or at least afforded very limited weight.</p> <p>15 A. Mmm-hmm.</p> <p>16 Q. Do "disregarded" and "afforded very limited weight"</p> <p>17 effectively amount to the same thing, in your view?</p> <p>18 A. No, no, certainly not. I understand that the standards</p> <p>19 are now part of the policy, because -- I know that</p> <p>20 because I looked at the existing policy the other day.</p> <p>21 Q. Yes, they are.</p> <p>22 A. That wasn't the case when I left. But the principle was</p> <p>23 that some of the standards should, in themselves, mean</p> <p>24 that reports should be disregarded because the way in</p> <p>25 which the report had been produced was clearly not up to</p> <p style="text-align: right;">Page 211</p>
<p>1 A. I mean, it certainly wasn't a primary part of our</p> <p>2 thinking in the Adults at Risk policy.</p> <p>3 Q. No.</p> <p>4 A. But I understand that segregation is used for various</p> <p>5 reasons, and not just because an individual may be --</p> <p>6 Q. Mentally unwell?</p> <p>7 A. Mentally ill.</p> <p>8 Q. Was any consideration given to the limits that need to</p> <p>9 be imposed upon the use of segregation, particularly on</p> <p>10 vulnerable people, in the formulation of the Adults at</p> <p>11 Risk policy?</p> <p>12 A. It certainly wasn't something I was involved in.</p> <p>13 Q. In relation to the Adult at Risk reforms that were</p> <p>14 proposed by you in August 2020, again, there was</p> <p>15 a consultation, I think, with stakeholders at that time</p> <p>16 and there were three key areas of reform proposed. The</p> <p>17 introduction of quality standards for external medical</p> <p>18 evidence in Adults at Risk; a change to the framework on</p> <p>19 detention of potential victims of trafficking; and then</p> <p>20 some reforms to the Adults at Risk safeguards</p> <p>21 themselves, including a change to the approach to</p> <p>22 assessing immigration factors concerning levels 2 and 3</p> <p>23 and expanding the range of health professionals who may</p> <p>24 be authorised to conduct rule 35 report assessments. Is</p> <p>25 that right?</p> <p style="text-align: right;">Page 210</p>	<p>1 the appropriate standard. But there were reasons to</p> <p>2 question either the veracity or the way in which the</p> <p>3 report had been produced. Whereas other issues, such</p> <p>4 as, you know, checking your previous medical history,</p> <p>5 may -- and I can't remember where that failed, but may</p> <p>6 have been less important than the actual way in which</p> <p>7 a report would be regarded.</p> <p>8 Q. Because there is a concern that, in circumstances where</p> <p>9 the report is still of high quality, and is therefore</p> <p>10 still of value in identifying vulnerabilities and those</p> <p>11 who shouldn't be detained, can be disregarded or</p> <p>12 afforded very limited weight simply because they haven't</p> <p>13 met a particular standard that's within these standards?</p> <p>14 A. Yeah.</p> <p>15 Q. Do you understand that?</p> <p>16 A. I do understand, but --</p> <p>17 Q. And so -- sorry, I'm quite limited on time. I'm sorry</p> <p>18 for interrupting you. What I wanted to get your view on</p> <p>19 is really where, for example, the standards don't relate</p> <p>20 to the quality of the report, such as, for example, one</p> <p>21 standard is that the reporter has to raise concerns</p> <p>22 immediately with the IRC's healthcare department, that</p> <p>23 has no impact on the value of what's in the report, does</p> <p>24 it?</p> <p>25 A. Well --</p> <p style="text-align: right;">Page 212</p>

53 (Pages 209 to 212)

<p>1 Q. But it said in the standards "may result in the report 2 being afforded very limited weight"?</p> <p>3 A. One of the main things we were seeing, and I do remember 4 this, that reports were being submitted by medical 5 practitioners via legal firms, and they were being 6 received seven, ten days after the report had been 7 written, whilst, at the same time, the report was saying 8 that the individual was at immediate risk, immediate 9 serious risk, because of detention. The issue that that 10 raised was that the author of the report was willing to 11 attest to the fact that the individual was suffering 12 harm, yet was willing to let them stay in detention for 13 the time it took them to write the report and submit it 14 to the Home Office.</p> <p>15 Now, we took the view -- and I don't think this is 16 unreasonable -- that if those concerns were so real, 17 they should have been raised with healthcare by the 18 visiting practitioner immediately.</p> <p>19 Q. I see. At the time, the standards were said to be 20 necessary by the Home Office because the Home Office had 21 received a large number of reports that had fallen below 22 the expected professional standards --</p> <p>23 A. Yes.</p> <p>24 Q. -- and there was effectively an abuse of the system 25 happening, a strategic approach, which is effectively</p> <p style="text-align: center;">Page 213</p>	<p>1 A. These are the proposals?</p> <p>2 Q. Yes. So that effectively results in a removing of 3 the level 1 self declaration, doesn't it?</p> <p>4 A. I'm trying to remember the details. But I know it was 5 based on an assessment of the likelihood of 6 the individual suffering harm. I can't remember the 7 detail of that.</p> <p>8 Q. Well, if that is right, and what -- now, to be classed 9 as an Adult at Risk, if the proposal for change was to 10 occur, if that is right, in order to be classed as an 11 Adult at Risk, one would have to have independent 12 evidence of harm, then that results, doesn't it, in 13 those who simply are self declaring not being 14 investigated and notified to the Home Office, 15 potentially leading to a category of vulnerable people 16 not being explored and reviewed for detention decisions? 17 Isn't that a concern?</p> <p>18 A. Could you remind me of what the proposed level 1 said? 19 There were three likelihoods of risk. Was it the high 20 likelihood of risk, a medium or moderate and low 21 likelihood?</p> <p>22 Q. Under the proposal for change or --</p> <p>23 A. No, the proposal for change.</p> <p>24 Q. So, yes, there was a proposal that no longer was there 25 to be a self-declaration --</p> <p style="text-align: center;">Page 215</p>
<p>1 what you have just described. Is that what you're 2 saying?</p> <p>3 A. I think so. I don't like to bandy the word "abuse" 4 around, but the practices we saw certainly gave us cause 5 for concern about the way in which these reports were 6 being employed.</p> <p>7 Q. The ICIBI reported in their 2021 inspection report 8 reporting on the year 2020, and they recommended that 9 the Home Office investigate and share their findings 10 with staff and key stakeholders. Were you aware of 11 that?</p> <p>12 A. That was in ...?</p> <p>13 Q. So it was reporting in 2021 but related to 2020.</p> <p>14 A. I wasn't at work in 2021.</p> <p>15 Q. You had already retired by then?</p> <p>16 A. Yes.</p> <p>17 Q. The Home Office, so far as we know, hasn't investigated 18 and shared their findings. Again, would that cause 19 a concern?</p> <p>20 A. I can't speak for the approach the Home Office is taking 21 now.</p> <p>22 Q. In removing -- under the new policy, an individual 23 wouldn't be categorised as an Adult at Risk unless they 24 had a professional assessment to support it, so level 2 25 evidence?</p> <p style="text-align: center;">Page 214</p>	<p>1 A. Yes, okay.</p> <p>2 Q. -- as an Adult at Risk and that's what I'm asking you 3 about at the moment, that in order to be classed as an 4 Adult at Risk, one had to have not only self-declared 5 but also to have independent evidence. Doesn't that 6 result in a category of people not being investigated 7 and considered as vulnerable?</p> <p>8 A. If the new level 1 would be people with a low likelihood 9 of harm, they would have to be identified in the first 10 place to be assessed as that. But I don't see that that 11 necessarily precludes individuals from raising 12 a vulnerability, and then that would automatically lead 13 to healthcare in the IRC assessing that and deciding 14 whether -- what the likelihood of harm was.</p> <p>15 Q. But it doesn't lead to them being categorised -- if it 16 is simply a self-declaration --</p> <p>17 A. But if that self-declaration leads to them being 18 assessed by a healthcare -- a member of healthcare and 19 then that healthcare -- member of healthcare then making 20 an assessment of the likelihood of the individual 21 suffering harm, that will inevitably be either low, 22 moderate or high, and so that would lead to an 23 assessment. You have to forgive me. If you had asked 24 me that two years ago I would have been able to tell you 25 off the bat, but that's me kind of conjecturing on what</p> <p style="text-align: center;">Page 216</p>

54 (Pages 213 to 216)

<p>1 I think the situation would have been.</p> <p>2 Q. The Shaw review identified originally a culture of</p> <p>3 disbelief in healthcare. Did you take account of that</p> <p>4 in any way in the Adults at Risk policy?</p> <p>5 A. I'm not sure -- in his first report he said that?</p> <p>6 Q. Yes.</p> <p>7 A. I don't recall that and I don't recall that being part</p> <p>8 of my consideration.</p> <p>9 Q. We know that various bodies continued to remain</p> <p>10 concerned about aspects of the policy and critical of it</p> <p>11 and the safeguards in place following its introduction</p> <p>12 following Shaw. That included Shaw in his second review</p> <p>13 in 2018 and included the ICIBI, the IMB and the HMIP in</p> <p>14 various reports post 2017, and I just want to look at,</p> <p>15 again very briefly, some of those particular concerns</p> <p>16 and criticisms.</p> <p>17 Various reports have identified that rule 35</p> <p>18 continued to be systemically dysfunctional. There were</p> <p>19 delays reported in appointments with GPs in 2020, there</p> <p>20 had been a dramatic increase in the number of rule 35(3)</p> <p>21 reports in Brook House, and indeed, in 2020, there</p> <p>22 remained only two rule 35(1) reports and still no</p> <p>23 rule 35(2) reports, despite high levels of self-harm,</p> <p>24 high levels of ACDTs open and including with detainees</p> <p>25 on constant watch indicating a high risk of suicide. Do</p> <p style="text-align: center;">Page 217</p>	<p>1 a detention review whenever anything was reported under</p> <p>2 it, if working in tandem with reports from healthcare</p> <p>3 that an individual is suffering from harm, the Adults at</p> <p>4 Risk policy should be responsive to that.</p> <p>5 Q. If it isn't, what's the explanation for that?</p> <p>6 A. Well, either the information isn't getting through or --</p> <p>7 Q. It is not operating effectively on the ground?</p> <p>8 A. I guess, yes.</p> <p>9 Q. The IMB report in 2021 reporting on 2020 found</p> <p>10 "a continued failure to identify vulnerabilities" and</p> <p>11 that "the Adults at Risk evidence levels had not been</p> <p>12 addressed". The concern about the evidence levels being</p> <p>13 that the levels relate to the amount of evidence that</p> <p>14 the detainee is required to produce --</p> <p>15 A. Yes.</p> <p>16 Q. -- and not to their assessed level of vulnerability, and</p> <p>17 that this has been worsened by high numbers of</p> <p>18 vulnerable detainees. Do you have any particular</p> <p>19 comment on that finding?</p> <p>20 A. Yeah, there are a couple of things there which I may</p> <p>21 forget as I go through them. The first thing is, the</p> <p>22 policy was designed to be evidence based, because our</p> <p>23 view was that the best way of assessing an individual's</p> <p>24 vulnerability was on the basis of the evidence that was</p> <p>25 available, medical evidence predominantly, but any other</p> <p style="text-align: center;">Page 219</p>
<p>1 you agree that the rule 35 system continues to operate</p> <p>2 dysfunctionally?</p> <p>3 A. I have no idea. I haven't worked there for 15,</p> <p>4 16 months.</p> <p>5 Q. If those things are right, that must be correct, mustn't</p> <p>6 it?</p> <p>7 A. That's an inference you could draw.</p> <p>8 Q. In relation to the second Shaw review, that found that</p> <p>9 there were still detainees in IRCs who should not have</p> <p>10 been in detention and that the Adults at Risk policy</p> <p>11 appeared to have made matters worse, not better. Do you</p> <p>12 have any comment upon that?</p> <p>13 A. No.</p> <p>14 Q. The IMB 2020 report reporting on 2019 found that the</p> <p>15 Adults at Risk system failed to capture deterioration in</p> <p>16 a detainee's condition and did not adequately capture an</p> <p>17 individual's level of vulnerability and they failed,</p> <p>18 therefore, to adequately safeguard vulnerable detainees</p> <p>19 at Brook House. Do you have any comment on that?</p> <p>20 A. Only inasmuch as -- I mean, I have to disagree in</p> <p>21 general terms with the comments about the Adults at Risk</p> <p>22 policy failing to keep pace with potential deterioration</p> <p>23 in the individual's condition. It was certainly</p> <p>24 designed to be flexible, to be dynamic, as Stephen Shaw</p> <p>25 recommended, and combined with the fact that it required</p> <p style="text-align: center;">Page 218</p>	<p>1 evidence -- social workers or whoever, professional</p> <p>2 evidence, we accepted. Gosh, I'm so sorry. You</p> <p>3 couldn't say it again and then I can remember?</p> <p>4 Q. I can certainly, yes. So the concern was that there was</p> <p>5 a continued failure to identify vulnerabilities and the</p> <p>6 concern related to the evidence levels, that the amount</p> <p>7 of -- they required -- the evidence to be -- required to</p> <p>8 be produced by the detainee and not to their assessed</p> <p>9 level of vulnerability?</p> <p>10 A. Yeah. I mean, I think I'd say on that that the</p> <p>11 proposals we were working on in 2020 were at least</p> <p>12 partly designed to really focus on the harm that an</p> <p>13 individual was likely to suffer. So still retaining the</p> <p>14 kind of evidence element, in that it would be based on</p> <p>15 reports from doctors, but really, really focusing on</p> <p>16 what the issue was with the individual and whether they</p> <p>17 were going to suffer harm in detention. So I think that</p> <p>18 kind of half-addresses that concern. But obviously</p> <p>19 I don't know whether the policy has been put in place,</p> <p>20 but I don't think it has.</p> <p>21 Q. Finally, then, the inquiry has heard a considerable</p> <p>22 amount of evidence about a toxic culture existing in</p> <p>23 Brook House in 2017 involving, amongst other things,</p> <p>24 institutionalised racism and the dehumanisation of</p> <p>25 detainees and we have all seen the Panorama footage.</p> <p style="text-align: center;">Page 220</p>

55 (Pages 217 to 220)

<p>1 I take it you have seen that as well?</p> <p>2 A. Yes, I have.</p> <p>3 Q. Do you consider, in your view, that any deficiencies in</p> <p>4 the policies in dealing with vulnerable detainees, such</p> <p>5 as the Adult at Risk policy, and the defects in the</p> <p>6 rule 35 system, may contribute to such a culture leading</p> <p>7 to mistreatment of vulnerable detainees?</p> <p>8 A. I have no reason to think that they do.</p> <p>9 MS SIMCOCK: Thank you. Chair, those are all the questions</p> <p>10 I have for this witness. Do you have any questions?</p> <p>11 Questions from THE CHAIR</p> <p>12 THE CHAIR: Thank you, Ms Simcock. Thank you very much,</p> <p>13 Mr Cheeseman. I just have one question in relation to</p> <p>14 something slightly earlier on in your evidence.</p> <p>15 Ms Simcock asked you about contact that you had from</p> <p>16 Dr Oozeerally and then you recalled, having heard his</p> <p>17 evidence, and gave some information about that.</p> <p>18 A. Yes.</p> <p>19 THE CHAIR: Do you recall ever having any conversations,</p> <p>20 contact, emails, meetings, any other correspondence with</p> <p>21 other GPs from other IRCs expressing concerns about</p> <p>22 rule 35?</p> <p>23 A. I can't remember expressly. There may well have been.</p> <p>24 I didn't have a direct line to many GPs, and I don't</p> <p>25 recall ever having any phone calls from any, other</p> <p style="text-align: right;">Page 221</p>	<p>1 but I have very helpfully been referred to the reference</p> <p>2 that the Home Office raised with me.</p> <p>3 Further examination by MS SIMCOCK</p> <p>4 MS SIMCOCK: Mr Cheeseman, I had asked you about the</p> <p>5 importance of the rule 34 and rule 35 rules acting in</p> <p>6 conjunction with each other at the outset of detention</p> <p>7 in screening for vulnerability.</p> <p>8 A. Yes.</p> <p>9 Q. Given that there isn't a screening tool prior to</p> <p>10 detention in relation to screening out victims of</p> <p>11 torture, the reference came in the context of the case</p> <p>12 of D&K in 2006 where there had been argument about</p> <p>13 whether there was a duty to provide such screening prior</p> <p>14 to detention at common law. The court found that there</p> <p>15 hadn't. The Secretary of State for the Home Department</p> <p>16 had opposed the imposition of such a duty at common law</p> <p>17 in that case. As I said, the court found that there was</p> <p>18 no duty in law. But that also led the court to find</p> <p>19 that that screening role of rule 34 and rule 35 at the</p> <p>20 outset of detention was therefore all the more vital.</p> <p>21 Does that assist you in any way?</p> <p>22 A. I'm sorry, I really don't understand the question. I do</p> <p>23 apologise.</p> <p>24 Q. Wouldn't you agree that, given that there's no screening</p> <p>25 tool and no duty to screen in relation to vulnerability</p> <p style="text-align: right;">Page 223</p>
<p>1 than -- or emails from others, other than Dr Oozeerally.</p> <p>2 We had engagement, as part of policy development, with</p> <p>3 a couple of GPs in Harmondsworth and Colnbrook and one</p> <p>4 in Dungavel, but I can't remember any explicit examples.</p> <p>5 THE CHAIR: Would your expectation -- was there a structure,</p> <p>6 I guess is my question, for how medical practitioners</p> <p>7 would feed in concerns related to the policy in an</p> <p>8 ongoing capacity, as opposed to a consultation when the</p> <p>9 policy was first written?</p> <p>10 A. Yeah, there was a head -- I think -- I'm not sure</p> <p>11 whether he covered all the IRCs or just the near-London</p> <p>12 ones, but there was, within Detention Services,</p> <p>13 a colleague who acted as kind of the liaison between</p> <p>14 healthcare within IRCs, the rest of immigration</p> <p>15 enforcement and policy, and we had very, very good</p> <p>16 connections with him, and I would probably have heard of</p> <p>17 concerns through him.</p> <p>18 THE CHAIR: Can you remember that person's name?</p> <p>19 A. Yeah, yeah, I think his name has been mentioned before,</p> <p>20 Terry Gibbs.</p> <p>21 THE CHAIR: Terry Gibbs?</p> <p>22 A. Yes.</p> <p>23 THE CHAIR: Thank you very much. I have no other questions,</p> <p>24 Mr Cheeseman. Do you have a follow-up, Ms Simcock?</p> <p>25 MS SIMCOCK: I do, chair, not from anything you have asked</p> <p style="text-align: right;">Page 222</p>	<p>1 and victims of torture prior to their detention, that</p> <p>2 the rule 34 and rule 35 safeguards at the outset of</p> <p>3 detention are all the more important?</p> <p>4 A. In the terms that you've put it, yes.</p> <p>5 Q. And given that the Home Office, at least in 2006,</p> <p>6 appeared to oppose such a duty to screen beforehand,</p> <p>7 does that indicate a Home Office attitude in relation to</p> <p>8 the vulnerability -- detention decisions in relation to</p> <p>9 vulnerable people at the outset of detention?</p> <p>10 A. Does it indicate the ...?</p> <p>11 Q. Well, is there an attitude that there's no necessity to</p> <p>12 screen for this type of vulnerability, either prior to</p> <p>13 or at the outset of detention, in order to route those</p> <p>14 people out of detention? They prefer a "wait and see"</p> <p>15 approach to see if harm actually occurs whilst the</p> <p>16 person is in detention?</p> <p>17 A. Thanks for putting it in those terms, because it does</p> <p>18 make it easier for me to address this in some way.</p> <p>19 This isn't an issue that I was directly involved in.</p> <p>20 I think the approach that I would have advocated is, as</p> <p>21 I think I mentioned earlier, that it's good to have as</p> <p>22 much information about an individual's vulnerability at</p> <p>23 as early a stage as is possible. There are processes in</p> <p>24 place -- you've got the detention gatekeeper, you've</p> <p>25 got -- there is screening in certain areas, certainly in</p> <p style="text-align: right;">Page 224</p>

56 (Pages 221 to 224)

<p>1 asylum and some – and that catches some cases. I don't 2 know about national removals command. But the principle 3 for me would be, get the information as quickly as you 4 can. Sometimes, of course, an individual's 5 vulnerabilities don't emerge until they are actually in 6 detention. But I'm not sure it necessarily reflects an 7 unwillingness on the part – if this is what you are 8 suggesting, and I'm not certain it is – an 9 unwillingness on the part of the Home Office to gather 10 that information. If there are reasons why particular 11 types of screening at particular stages don't happen, 12 then I'm afraid you'll need to ask the Home Office about 13 that rather than me. 14 Q. Yes. Isn't the danger, though, and the concern, that if 15 there isn't screening happening prior to detention, and 16 the rule 34 safeguard is failing, that that's leading to 17 vulnerable people who shouldn't be being detained being 18 harmed in detention because of the fact they are being 19 detained? 20 A. I suppose, if you accept that rule 34 is the kind of 21 fallback – 22 Q. Yes? 23 A. -- the kind of – 24 Q. Indeed. 25 A. -- gate, and if it's true that it is not operating</p> <p style="text-align: center;">Page 225</p>	<p>1 Questions from THE CHAIR154 2 3 MR IAN CHEESEMAN (affirmed)155 4 5 Examination by MS SIMCOCK155 6 7 Questions from THE CHAIR221 8 9 Further examination by MS SIMCOCK223 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24 25</p> <p style="text-align: center;">Page 227</p>
<p>1 properly, then your concerns would be valid, I suppose. 2 MS SIMCOCK: Thank you very much. Thank you, chair. 3 THE CHAIR: Thank you very much. Thank you very much, 4 Mr Cheeseman. My apologies we have kept you slightly 5 longer. 6 A. No problem at all. 7 THE CHAIR: But it has been very important to hear from you 8 and I'm very grateful for your evidence. 9 MS SIMCOCK: 10.00 o'clock tomorrow. 10 THE CHAIR: Thank you very much. 11 (4.48 pm) 12 (The hearing was adjourned to 13 Thursday, 17 March 2022 at 10.00 am) 14 15 16 I N D E X 17 18 MR JULIAN PAUL WILLIAMS (affirmed)1 19 20 Examination by MS TOWNSEND1 21 22 MR DANIEL JAMES HAUGHTON (affirmed)73 23 24 Examination by MS MOORE73 25</p> <p style="text-align: center;">Page 226</p>	

A	158:25	175:13 186:16	ADs 143:6	age 180:17
AAR 153:17	accompanying	202:12	adult 153:16	agenda 131:16
abhorrently 34:14	205:15	actions 71:14	210:13 214:23	132:18,20
ability 26:17 88:17	account 83:3	102:1,5 110:20	215:9,11 216:2,4	agent 186:16,17
100:19 122:5	128:25 129:3	176:8	221:5	ago 39:19 216:24
160:14 206:12	144:7,8 169:13	actively 86:8	Adults 153:13,17	agree 26:20 42:6
able 17:10 20:5,10	170:1 183:22	172:24 205:7	163:2,5 164:11	53:2,22,23 54:1,1
43:1 60:14 65:4	217:3	activities 4:4,8	166:17 168:25	54:4 56:8 100:3
65:18 89:20 96:3	accountability 9:1	18:17,19,23 19:7	170:12,23,25	125:8 164:3,5
100:5 126:16	accounts 128:8,15	19:9 48:21,22	171:2,3 175:1	190:2 191:8,20
150:5 151:20	144:9	49:6,9 56:6,9,21	176:9 178:6,22	192:13 201:15
191:1 195:25	accuracy 84:9	99:6 100:5 138:9	179:8 181:13	203:20 209:9,17
207:25 216:24	159:8	138:12	182:7,10,24	218:1 223:24
abrupt 42:4,7,11	accurate 15:18	activity 55:21	183:11,14,19,24	agreed 39:20 96:4
absence 86:20	86:1 115:7,20,22	209:5	184:18,22 185:5	96:7 102:12
145:11 197:4	accurately 184:9	actor 187:5	188:3 190:14,16	130:20,22 137:24
200:22	ACDT 56:23 58:13	actors 185:7	191:14 193:2,5	Ah 1:13
absences 145:10	62:10,10 63:8	acts 82:2 83:5,10	193:10 194:22	ahead 187:1
absolute 29:25	106:7,8,10,13	148:11 151:6	196:9,20,23	207:19
180:2	114:16 153:17	201:9	199:15 201:6,10	aid 150:10,16,21
absolutely 99:16	178:15 200:25	actual 32:16	201:19 204:19	150:22
100:2 114:6,6	204:4	117:16 185:25	208:14,15,17	aim 182:7
120:8 163:4	ACDTs 153:10	212:6	209:3,5,23 210:2	aimed 49:12
182:6	217:24	ad 9:12 174:5	210:10,18,20	Alan 37:7,18
abuse 7:12 30:1,4	achieve 153:7	add 52:11 199:1	217:4 218:10,15	Aldis 37:7,19
34:22 148:11	182:11 192:10	added 95:24	218:21 219:3,11	allegation 23:2
149:1 186:22	achieved 190:22	143:10 165:3	advantage 31:24	196:4,5
213:24 214:3	achieving 177:11	180:19	adversely 202:22	allegations 64:23
abusive 34:17	acknowledge	adding 189:10	advertised 2:21,23	68:7
35:25	153:4	addition 194:3	advice 133:10	allocate 176:25
accept 28:12,14	ACO 50:25 76:10	additional 55:11	134:9 171:12	allocated 136:22
68:10 79:15	act 34:11 35:14	55:13 64:6,8	advisor 157:2,7	145:2
84:11 103:2	82:24 83:11	address 143:24	advocacy 206:20	allow 129:8 205:2
111:12,18 112:4	111:4 112:5	144:2 162:2	207:3,12,14	allowed 33:7
113:10 114:2	131:2,4 176:4	164:7 169:1	advocated 224:20	105:11 142:12
164:2 187:6,7	186:13 193:4	175:13 187:3	affect 69:10 88:17	146:6,16 179:2
225:20	201:12 206:7	190:18,18 224:18	affiliated 150:13	alluded 103:4
acceptable 204:15	acted 222:13	addressed 219:12	affirmed 1:3 73:18	125:16
acceptance 165:24	acting 34:2 76:25	adduced 1:19 74:2	155:22 226:18,22	alludes 130:8
accepted 78:11	109:7 110:25	156:6	227:3	alongside 12:13,16
87:18 165:22	112:22 195:5	adequacy 84:9	afford 100:12	26:4 57:17 201:1
181:20,24 190:1	196:1 223:5	99:14	afforded 211:14	alternative 120:25
207:4,6 220:2	action 21:11 35:7	adequate 98:19	211:16 212:12	181:2 205:6
accepting 74:13	46:4 89:1,2	99:4,18 206:9	213:2	Altman 87:10
accepts 87:17	101:15,19,21	adequately 137:20	affront 164:21	amazing 152:14,14
access 87:9 120:5	102:16,22 104:3	152:11 218:16,18	afraid 36:9 225:12	amended 175:21
120:7 127:8,11	104:14 112:18	adjourned 226:12	aftermath 33:22	amending 202:8
136:1 197:20	119:23 142:16	adjournment	afternoon 73:16	amendments
accompanied	147:15,16 174:13	118:1	73:20 155:20	196:10

amount 64:13 150:2 184:5 186:13 211:17 219:13 220:6,22	16:16 65:15 appointment 193:18,19 194:14 194:17 196:17,19	76:10 172:1,9 174:19 210:16 224:25	173:9 216:2 asks 51:1 202:11 asleep 21:10 22:15 22:17,24	attach 80:3,4 attached 78:8 108:16
angle 158:17 Anna 132:10 announced 161:8 annual 39:10 47:5 annually 47:16 answer 18:5 20:18 20:19 27:22 51:4 51:6 170:15 answered 100:10 answers 100:9 Anthony 37:7,18 anticipation 98:1 98:2 anymore 97:11,19 98:5 anyway 24:21 56:16 113:18 apart 13:9 18:11 19:9 48:20 52:21 59:7 71:6 apologies 57:14 226:4 apologise 223:23 apologised 68:3,3 apparent 72:11 164:10 Appeal 206:3 appear 120:16 126:22 203:24 appeared 20:1 67:16 218:11 224:6 appears 123:19 appendices 159:5 application 168:24 190:21 applied 80:16 108:20 175:5 181:8 187:8 applies 208:18 apply 176:13 191:1 applying 90:10 202:19 appointed 2:18	appointments 2:18 217:19 appraisal 39:11 47:5 appreciate 109:15 110:20 113:14 128:7 165:13 appreciated 165:9 apprenticeship 46:23 approach 10:17 34:7 188:4,8 189:17 190:15 191:4,23 192:18 210:21 213:25 214:20 224:15,20 approaching 187:24 appropriate 16:20 41:5 113:17 147:9 152:23 181:5 187:9 193:15 194:12 212:1 approve 122:1 approximately 93:2 April 10:4 47:11 63:21 Aramark 26:1,4 Arbaleaz 47:23 area 12:4 17:22 18:1,4 22:8 42:1 44:24 48:20,25 79:4 103:18,20 108:12 109:22 136:17 140:18 156:24 172:4 173:16,22 176:22 183:23 199:6 areas 4:3 18:1,6,8 18:9 24:5 25:14 25:20 31:22 33:4 48:17 49:11,13 71:10,12 72:14	argue 167:7 arguing 30:22 argument 30:16 30:21 31:6,9 223:12 arising 53:11 arose 32:12 arrange 33:7,8 60:21 101:14 122:14 arranged 60:25 108:4 arrangements 11:14 19:15 122:24 207:3,9 207:10 arrival 118:16 arrived 14:11 58:17 112:21 arriving 14:10 193:14 article 160:5,7 167:14,15 168:1 170:8 arts 4:4 ascertain 136:19 195:21 ascribed 167:22 168:14 asked 14:14,14,15 14:24 15:3,4 37:21 45:12 47:18 49:18,21 49:25 53:17 58:15,19 87:10 92:10 93:9 97:6 101:14 105:4 107:16 118:4 128:23 129:10,16 129:18 141:18 144:16,17 145:8 173:2 216:23 221:15 222:25 223:4 asking 53:24 60:20 129:1,11 160:3	aspects 148:16 188:2 aspects 56:18 71:1 217:10 assaulted 186:4 assess 113:25 151:20 172:25 assessed 216:10,18 219:16 220:8 assessing 210:22 216:13 219:23 assessment 108:22 109:1,14 112:21 113:1 125:3,6,7 125:14 126:15 130:9,11 137:6 150:8 161:7 188:5 196:15 197:5 200:14 214:24 215:5 216:20,23 assessments 181:6 210:24 assist 12:2 27:3 71:14 100:19 223:21 assistance 206:20 assistant 77:17 90:14 153:5 associate 123:21 association 118:23 119:5 120:1 150:16 206:13 208:1 assume 2:3 4:18 5:21 40:10 106:14 122:21 148:1 176:23 assumed 200:21 assumption 107:11 asylum 158:2,14 158:14,15 195:14 225:1 atmosphere 104:1	attempted 201:12 208:16 attend 9:10,23,24 21:22 22:1,11,12 22:13 47:18 59:19,24 60:21 77:10 113:8 151:2 175:10 attendance 7:9 attended 6:19,20 7:6 9:5,25 20:19 26:24 27:1 91:6 101:15 125:4 138:2 159:6 200:5 attending 4:6 9:18 24:9,10,10,11 44:18 158:21 attention 171:7 172:17,18 attest 213:11 attitude 36:15 187:13 224:7,11 attitudes 6:7 29:5 32:25 audit 88:17 90:1 141:2 172:11 audited 18:7 90:5 90:6,6,8 140:25 auditing 75:24 89:6 101:22 173:5 auditor 18:7 24:1 audits 76:16 77:22 90:19 171:16 August 10:4 48:14 49:17 52:22 69:19 210:14 author 162:17 213:10 authorisation 126:21 129:2,3 authorise 121:16 126:16,18 129:7 authorised 118:13 119:5 124:16,20

126:12 127:1 210:24 authorising 119:3 authority 119:1 121:24 123:8 automatically 216:12 available 5:19,20 5:22 17:2 18:22 18:25 27:3 28:20 56:10 61:8,9 80:1,4,11,14,21 202:24 219:25 avoid 124:1,10 aware 25:8 30:5 45:9 48:7 51:19 65:8,13 84:25 86:11 87:8 88:3 93:9 95:18 106:11 112:24 118:25 134:11 139:8,18,19 148:21 149:17 158:7 160:5,10 160:11,12,16,22 161:3,9,15,22,24 162:1,6,22 163:19,25 164:8 164:14,23 165:16 165:22 166:10 167:23 168:5,9 168:15,21 169:2 169:23 172:8,18 172:21 173:14 178:11,17,18 181:18 184:7 193:11,16,17 194:23 196:2,3 196:19,21,25 197:15 200:15,18 200:25 204:18,24 206:4 214:10 awful 183:22	28:21 33:3,3 34:4 37:16,17 49:18 50:12 60:23 66:5 70:16 70:18 80:25 84:12,14 85:22 88:16 90:1,11 102:6,17 103:17 113:25 115:17 117:10,21 123:7 125:11 127:9 132:10 137:14 141:10,11,20 143:13 144:4 149:6 154:19 170:7,11,19 171:22 175:17 177:7,24 191:6 196:8 background 1:23 11:18 74:9 107:24,25 127:16 158:10 bad 19:3 28:5,7 31:2 147:1 badgered 60:19 bag 114:8 balance 183:25 190:23 balanced 179:2 banana 67:23 bandy 214:3 bang 112:11 banged 112:1 barbed 13:1 Barber 143:5 barely 34:16 barrier 57:4 58:3 61:3,12 barriers 88:13 Barry 79:6,7 84:5 90:12,12 92:4,4 102:3 base 76:22 based 80:11,14 95:2 122:3 125:5 126:5,19,19 127:12 152:17 185:17 189:2	215:5 219:22 220:14 basic 28:10 153:14 basically 3:13 11:8 58:7 61:13 67:22 177:18 basis 24:3,23 29:4 89:22 92:22 120:11 163:1 175:3,4 219:24 bat 216:25 battery 128:10,12 BBC 7:13 bearing 169:24 Beck 52:15 beds 55:11,14,22 56:7,13,15 beep 107:20 befitting 68:7,10 began 164:11 Begg 144:23 beginning 32:4 57:10 59:22 behalf 13:20 134:9 186:17 behave 30:11 behaving 30:7 34:4 behaviour 66:11 68:7,10 120:2,14 120:17,19,20,22 144:21,22 147:1 148:22 152:6 belief 125:11,12 believe 4:24 5:23 8:12 9:2,14,17 14:13 16:15,20 16:24 22:16 23:1 23:8,9,10 27:4 41:9 42:23 44:25 45:19 46:1 54:18 54:20 55:2,24,25 56:3,3 60:2,5 64:10,17,17 69:4 69:7 70:4 72:5 104:20 131:11 135:8 138:3,3 146:4 151:18,23 154:4 163:10	183:5,15 190:3 197:25 198:15 believed 10:22 35:12 54:8 66:13 130:20 believes 66:10 Ben 7:14 41:22 53:12,17 54:24 88:16,19 92:16 92:20 93:18 95:13 101:12 102:6,15,18 104:8 131:15 132:23,23 133:3 133:8 Ben's 104:25 beneficial 92:25 benefit 102:25 benefited 16:21,25 60:15 94:2 best 6:9,10 18:21 18:25 56:10 109:8 111:1 112:22 152:22 219:23 better 12:22,22 33:24 96:12 111:15 115:18 152:25 153:11,14 188:1 209:1 218:11 better-running 32:2 beyond 70:23 BH 48:15 bid 91:25 92:11 93:2,7,9,16,24 94:2 95:12 bidding 93:10,11 big 33:19 136:14 bigword 61:9,16 bins 25:21 bit 20:3,3 26:2 28:5,7 56:11 59:12 81:14 96:11 123:16 127:15 130:3 150:17 151:11 154:12 175:14	199:6 bits 84:18 133:23 138:15 150:22 BLAKE 196:3 blaming 145:25 board 103:6 110:23 bodies 169:21,25 217:9 body 25:18 114:8 body-worn 106:24 107:8 boisterous 6:7 book 44:25 booked 196:18 booklet 45:4 borderline 39:2 Bosworth 165:18 189:25 bother 21:7 bottom 37:17 53:15 57:15 105:25 106:25 108:5,11 118:22 180:25 bound 70:2 boundary 133:11 bounds 131:4 bowl 112:2 breach 160:8 167:21 168:13 206:6 breached 160:24 breaches 168:19 break 63:14 73:14 117:21 155:18 breaking 51:7 52:11 brief 76:12 87:10 113:15 140:2 153:24 208:25 briefly 68:13 118:7 143:14 185:6 193:9 208:24 209:12 217:15 brilliant 151:24 bring 7:7 12:14,24 38:20 43:1,9
--	--	--	---	--

44:1 47:21,24 48:12 50:23 55:18 64:24 67:6 67:19 68:16 72:6 109:8 111:1 172:17 201:14 bringing 42:22 65:8,13 66:16,21 66:22 91:19 brings 202:24 British 150:15 broad 181:24 broadcast 69:23 broadened 182:14 broadening 182:20 broader 141:23 broadest 170:4 178:25 Brobyn 37:8 38:12 Brook 2:12,14,15 3:3 10:17,20,21 11:22 13:4,8,9,10 15:14 16:14 18:21 25:11 27:1 31:13,22 33:15 37:12 41:8 42:1 59:23 63:23 65:5 69:14 72:21 74:9 74:13,17,23 77:15,20 82:24 92:23 99:3 105:8 131:8 136:6 139:23 148:7,15 152:9 153:4,24 157:4 158:24 159:1 160:9 199:25 202:19 204:14 217:21 218:19 220:23 brother 105:10 brought 27:11 35:23 50:2 65:3 65:10 103:18 135:22 138:7 196:10 Brown 4:23 7:6,19 20:21,25 23:7,11 28:2 29:8 47:23	53:20 68:3 69:18 71:3 76:19 81:10 103:12 144:16 145:6 Brown's 26:9,11 brutally 174:1 BS 53:12,17 build 94:21 built 55:22 bullet 41:24 bullied 38:21 bully 39:2 bullying 39:2,9 68:14,21 144:21 business 185:15 busy 137:5 buy-in 200:9 buying 62:19 63:3 C c 57:17,21,22 82:10 204:17,25 205:5,5,18 C&R 7:24 8:2,6 75:25 call 30:9,12,18 31:8 52:13 108:10 126:3 128:1,3 176:8 called 29:23,24 113:18 149:22 153:16 calls 33:9 221:25 Callum 34:9 camera 105:24 106:24 107:8 cameras 34:23 Campsfield 2:11 cancelled 97:19 CAP 102:5 capacity 205:22 206:11,21 207:11 222:8 CAPs 101:20 capture 142:4 187:3 218:15,16 captures 142:5 card 18:23 cards 43:4 care 78:23 153:10	153:16,17 164:19 166:6 204:5 career 146:18 carried 165:18 174:16 187:4 194:10 195:10 197:18 carry 28:3 64:7,8 67:8 160:3 carrying 70:1 194:16 case 6:9 16:13 43:1 43:2 60:7 87:21 87:25 121:25 123:7 126:1 129:21 132:16 138:14 146:24 164:2 167:4 170:17 171:4,5,7 171:11 172:3,18 173:14 175:8 176:3 182:18 183:6 185:22,24 185:25 186:18 190:11 194:12 201:23 205:17 206:3,6 211:22 223:11,17 cases 119:1 122:18 160:5,6,7 161:10 167:14,16 168:2 168:3,7 171:16 171:18 172:8,21 173:3,6,9 176:9 176:12 178:11,18 185:19,20,25 186:1,14 195:14 195:15 198:9 201:3,5 225:1 casework 169:10 171:10 172:5 173:7 185:16 196:15 caseworker 170:18 191:17 199:12 caseworkers 178:7 191:1 201:5 205:1	caseworking 172:1 172:9,12 174:19 176:13 178:9 Castle 19:24,24 77:22 catch-up 146:10 catches 225:1 categories 165:1 179:22 188:9,11 189:10,13,18,24 190:5,9,9 204:23 categories-based 189:17 categorised 214:23 216:15 category 190:12 192:2,18 215:15 216:6 category-based 188:4,8 190:15 191:4,4 catering 6:24 cause 19:11,13 126:24 163:22 214:4,18 caused 32:9 191:24 192:12 causes 120:14,22 causing 72:15 Caz 145:3 CCTV 67:11 cells 34:22 cent 83:14 111:23 141:2 150:21 central 76:18 141:12 179:9 centre 6:14 17:7 17:15 18:22 19:5 23:24 29:21 31:19,21 41:2 43:18 44:20 49:2 58:17 64:6 65:9 65:14 69:11 70:15 71:9,12 77:7,8 78:21,22 78:22 94:23 95:3 96:3 113:4 120:15 122:21 123:3 124:3,24	127:8,17 135:18 136:2 143:15,23 157:4 196:11 centres 3:13 127:19 175:24 198:17 certain 20:7 45:2 64:13 77:10,10 111:4 141:22 151:10 163:9 168:2 176:21 183:2,4,5 224:25 225:8 certainly 26:3,25 49:2 100:8 159:22 160:18 164:10 169:2,11 185:20 186:8 191:3 192:9 194:3,10 195:4 199:3,18 202:18 204:20,24 205:5 207:4 209:14 210:1,12 211:18 214:4 218:23 220:4 224:25 certificated 150:19 cetera 78:24 80:19 118:16 136:20 189:15 chain 170:20 chair 1:5,19,21 57:10,14 63:13 63:16 73:5,6,16 74:5 117:20,24 153:21,23 154:1 154:2,7,9,12 155:8,14,16,20 196:3 221:9,11 221:12,19 222:5 222:18,21,23,25 226:2,3,7,10 227:1,7 chaired 142:24 chairs 143:3 challenge 89:3 158:5 challenged 23:3 challenges 6:4
---	--	--	--	--

<p>21:11</p> <p>challenging 6:11</p> <p>change 39:20,25 55:2 64:5 73:11 152:5 175:20 177:16,17 210:18 210:21 215:9,22 215:23</p> <p>changed 32:20 33:1,14 39:23,25 51:15 62:8 63:11 75:8 81:12 91:18 92:6,7 176:4 177:9 207:5</p> <p>changes 91:13 174:11</p> <p>changing 21:3</p> <p>charge 13:8 36:14 127:19 147:6</p> <p>charisma 20:3</p> <p>Charlie 51:9</p> <p>chart 75:12</p> <p>chased 28:25</p> <p>chasing 69:17</p> <p>Chaudhary 200:6</p> <p>Chaudhary's 202:20</p> <p>check 84:4,6,9 90:2 121:12</p> <p>check-in 146:10</p> <p>checked 87:17 141:1 169:19</p> <p>checking 43:3 107:11 212:4</p> <p>checks 84:10,11 141:4</p> <p>Cheeseman 155:15,21,22 156:1,2 221:13 222:24 223:4 226:4 227:3</p> <p>chief 158:6 162:11</p> <p>children 11:11,16 12:23,25,25 13:5 158:16</p> <p>Chris 87:6 107:9 108:10</p> <p>church 13:16 14:1 14:2</p>	<p>CID 38:7</p> <p>cinema 56:13</p> <p>circle 37:14,24 38:5</p> <p>circulated 78:21</p> <p>circumstance 128:5</p> <p>circumstances 121:19,19 126:16 145:9 171:8,9,15 189:22,23 190:19 193:15 212:8</p> <p>civil 156:20,21 158:4</p> <p>civilised 164:22</p> <p>CJS000462 48:12</p> <p>CJS000530 63:20</p> <p>CJS000555 53:10</p> <p>CJS000676 122:7</p> <p>CJS004586 78:17</p> <p>CJS005652 105:19</p> <p>CJS0072810 75:10</p> <p>CJS0073633 68:16</p> <p>CJS0073667 66:6</p> <p>CJS0074048 72:7</p> <p>claim 134:18</p> <p>claimed 198:18</p> <p>claiming 198:15</p> <p>clarify 5:9</p> <p>classed 13:20 62:11 87:25 215:8,10 216:3</p> <p>classified 182:19 182:22</p> <p>clause 165:3,8 180:18</p> <p>clean 6:15 25:23 25:25 26:4</p> <p>cleaning 25:21,24</p> <p>cleanliness 4:10 6:14 18:7,11,13 23:24 24:8,20 25:9 71:9</p> <p>clear 81:19 105:20 114:11 135:24 164:17 202:18</p> <p>clearly 128:10 188:9 211:25</p> <p>clerk 139:23</p>	<p>clinical 150:3 152:18,19,21 153:2</p> <p>clinically 152:13</p> <p>clique 36:5</p> <p>cliques 29:2</p> <p>close 34:17 35:25 37:6,25 38:16 108:25</p> <p>closed 19:4 63:24 64:12 109:10</p> <p>closely 142:1</p> <p>closer 145:16</p> <p>closing 52:2</p> <p>clumsy 66:8</p> <p>co-managed 76:7</p> <p>co-operate 35:1</p> <p>co-ordinated 147:7</p> <p>coaching 26:14,21 26:23</p> <p>collate 79:18</p> <p>collation 147:12</p> <p>colleague 199:24 222:13</p> <p>colleagues 151:9 169:12 170:20 177:14,14,23 193:1 200:7</p> <p>collecting 3:14</p> <p>college 60:22</p> <p>Collier 105:5 109:15 111:13 113:23</p> <p>Collier's 108:24 130:2</p> <p>collusion 37:13</p> <p>Colnbrook 222:3</p> <p>combination 98:8</p> <p>combined 82:1 85:14 135:23 218:25</p> <p>come 11:17 14:21 14:24 17:14 19:21 21:9 24:22 25:24 27:24 28:21 30:15 31:21 36:4 50:10 50:13,14 63:25</p>	<p>66:5 67:1 68:1 70:16,18 73:9 83:24 90:1 97:5 97:6 98:13 117:10,13,21 118:11 124:20 129:7,24 133:17 136:5 142:14,15 147:22 163:14 171:7,12 174:4,8 175:14 179:4 180:24 192:23 195:2 196:7 204:14</p> <p>comes 111:16 143:1,6,7 195:20 196:4,6</p> <p>comfortable 13:3</p> <p>coming 17:13 21:8 24:1 46:1 59:4 59:11 73:7 93:4 145:19 174:25 207:20</p> <p>command 225:2</p> <p>comment 35:3 43:22 107:6 118:4 125:6 146:15 206:23 211:6 218:12,19 219:19</p> <p>commented 11:2 75:11 105:6 114:19</p> <p>commenting 108:15</p> <p>comments 39:11 39:13,15 190:10 218:21</p> <p>committed 72:24 73:2</p> <p>committee 21:3</p> <p>common 126:7 146:7 167:15 168:2 185:24 223:14,16</p> <p>communicate 20:5 20:6,10 204:15</p> <p>communicating 20:14 133:5</p>	<p>communication 201:7</p> <p>communications 10:14 11:22 177:13 205:1</p> <p>Community 81:9 82:19 83:4,16,19 83:23 84:16 86:12</p> <p>company 14:22 61:16 65:3,10 72:18</p> <p>compared 3:21 29:8 32:4 202:23</p> <p>compartmentali... 162:10</p> <p>compelling 188:25</p> <p>competent 17:19</p> <p>competitive 154:16</p> <p>compile 79:10,12 89:15,16 101:25</p> <p>complained 21:8 39:9</p> <p>complaining 43:14</p> <p>complaint 44:23 140:10,12,14,16 141:8,10 143:18 144:20 147:1 149:6</p> <p>complaints 4:8 34:16,24 44:22 75:24 76:17 139:21,23 140:2 140:5,20,22,25 141:2,17,20,21 141:23 142:5,5 142:18 143:13,18 146:21 147:2 149:10</p> <p>complete 26:17 45:21 46:8,10 70:6,10 83:21 146:3,9,17 149:24 198:24 199:1 204:10</p> <p>completed 28:24 64:21 79:3,8,21 83:22,25 141:8</p>
---	---	--	--	---

146:13 completely 94:4 107:6 completing 24:5 28:15,17 43:23 43:24 45:10 70:8 84:5 86:13 107:5 163:23 203:12 complex 183:19 184:2 190:25 207:1 compliance 76:17 79:2 88:18,23,24 89:1,2 90:19 91:7 99:16 101:13,18 142:25 compliant 88:18 compliant 102:2 compliantly 108:7 complicity 185:7 comply 108:6 compressed 183:8 184:6 computer 19:11 19:16 26:19 28:2 28:3,8,8,10 46:18 49:14 concern 120:23 126:23 135:5,8 135:15,22 137:9 137:10,18,22 138:7,8,16 150:5 186:19 191:22 197:2 200:18 209:14 212:8 214:5,19 215:17 219:12 220:4,6 220:18 225:14 concerned 15:6 22:7 68:19 133:9 152:4 166:3 182:10 199:3 200:25 217:10 concerning 67:13 137:3 157:9 197:7 208:11 210:22 concerns 7:10 35:2	42:22 43:1,9 86:16,25 108:6 132:23 133:25 135:17 138:5 151:8,22,24 152:3 159:24 160:3 184:7,14 184:24 185:2,14 188:2 191:3 194:15,17,20 196:22 199:17 203:18 204:15 205:20 206:18 211:3 212:21 213:16 217:15 221:21 222:7,17 226:1 concluded 168:12 conclusion 167:23 condition 166:10 190:15 201:12 208:21 218:16,23 conditions 151:11 155:3 166:2,16 179:17 190:12,13 191:12,12 201:13 209:1,3 conduct 88:17 181:5 210:24 conducted 67:16 68:6 118:16 168:1 conducting 70:24 121:8 confess 203:15 confidence 17:23 34:15,19 35:21 confident 60:10 64:15 confirm 73:20 confirmed 106:16 conflict 10:23 138:10 conflicts 155:4 confusion 105:20 117:17 conjecturing 216:25 conjunction	192:25 193:10 195:5 196:1 223:6 connection 161:12 192:7,9 193:16 209:22 connections 222:16 Connolly 8:12 consecutive 143:12 consequence 85:6 consider 6:4 18:9 74:6 104:11 124:22 166:22 167:10 181:2 184:5 201:5 203:22 221:3 considerable 220:21 consideration 141:24 177:3,16 202:25 204:8 208:18 209:22 210:8 217:8 considerations 117:7 203:9 considered 157:15 158:11 163:22 169:8 176:9 195:18 198:19,23 203:15 216:7 considering 168:11 202:8 203:3 consist 44:17,18 150:12 consistent 189:25 consolidated 101:20 102:16 consonant 166:6 constant 49:4,6 120:1 217:25 constantly 69:17 constituted 86:4 construed 171:21 consultation 182:24 183:1,3 210:15 222:8	consultations 183:4 consultative 7:1 consulted 183:16 contact 17:1 65:2 65:4,15,16,18,23 65:25 66:1,3 110:5,13 143:22 143:23,25 172:4 221:15,20 contacted 52:23 135:10 contacting 52:16 65:14 contacts 172:2 178:7 contained 136:17 contains 89:13 122:10 content 93:22 129:4 199:20 contents 7:18 context 157:10,12 161:24 196:6 223:11 continually 96:8 continue 37:4 63:15,16 117:22 118:3 135:12 153:8 157:15 164:18 169:7 continued 113:1 165:6 180:22 217:9,18 219:10 220:5 continues 218:1 continuous 143:12 contract 25:24 51:13 52:11 55:22 78:5 79:11 80:2,7 89:10,11 91:7,14,18 92:5,7 92:13,18,19,23 93:4,23 94:6,16 96:2,7 98:18 99:16 100:18 142:10 contracted 94:25 95:7,16	contracted-out 122:20 123:3 contracts 75:24 contractual 77:23 84:23 92:22 94:14 contractually 90:6 contrary 138:17 174:21 contrast 148:20 contribute 221:6 control 19:12 130:1 183:25 190:23 conversation 21:20 69:20 95:20 127:5 132:22 200:3 201:5 conversations 21:15 91:13 97:3 102:10 132:24 199:19,20 221:19 cook 19:20 coordination 176:24 copied 131:25 copies 25:1 Corndell 27:5,10 27:14 43:24 45:19 46:21 70:3 coronial 178:12 corporate 177:3 177:18 correct 1:15,18,23 3:8 13:2 36:22 47:6 62:3,22 74:24 75:5,16 76:6 78:7,14 87:15 90:4 130:23 156:11 157:6,11 158:23 185:10 208:13 211:1 218:5 correctly 9:9 11:11 70:5 178:5 correspondence 131:22 221:20 corridor 4:9
---	---	---	---	---

136:10 cost 36:19,24 costs 93:24 94:1 counsel 167:14 count 80:22 92:17 92:24 93:19 94:18 95:2,3,6,17 counter 10:24 counting 80:20 countries 3:15 couple 13:19 22:17 25:3 67:25 70:7 90:16 153:6,23 197:24 201:21 219:20 222:3 coupled 192:20 course 7:12 27:5 59:20,25 60:22 96:1 97:7,14 99:25 112:10,11 118:12 150:19 168:1 179:12 185:4 187:7 197:14 225:4 courses 11:14 26:25 27:1,2,8 44:18 47:18,20 97:5 court 160:6,7,12 160:23 161:6 170:8 175:8,17 176:3 206:3,6 223:14,17,18 courts 167:16 173:10,15 207:20 courtyard 49:13 51:11 154:5 courtyards 19:3 cover 48:23 49:4,6 90:13,13 92:11 98:13 covered 222:11 covering 48:16 covers 180:7 Covid 154:18 cracked 186:7 create 79:19 133:10 183:24 created 163:25	creates 90:9 crew 108:4 116:18 crisis 10:14 11:22 148:10 criteria 160:25 192:21 critical 42:5,12,21 42:23,25 43:6 178:23 217:10 criticised 164:12 173:11 criticisms 28:12 217:16 cross-reference 90:4 crossed 105:21 133:11 crucial 195:5 cruel 166:7 cruelty 34:11 Cs 201:3,7 CSU 125:21 151:5 cultural 19:18 142:2,13 149:7 culture 31:13 32:3 32:3,20 33:12,14 33:19,23 41:3,6,8 41:14 65:4 148:7 149:1 217:2 220:22 221:6 cunt 29:24 current 77:15,17 181:2 currently 66:10 cut 82:10 105:15 186:17	51:25 106:12 Dan 4:23 53:18 145:4 146:11 Dance-Jones 145:3 danger 225:14 dangerous 203:3 Daniel 73:18,22 226:22 Darren 141:13 149:7 data 79:10,12,19 80:19 81:2,4,6,6 82:7 84:1,8,9 86:1 88:24 89:16 90:2 127:11 142:13 182:17 197:20,22 database 127:9 date 105:11 119:4 176:10 200:1 dated 1:17,17 78:20 Dave 8:14 David 37:7,19 Davies 50:25 103:21 131:16 133:1 Davis 52:16 day 4:6,6 6:13 41:12,12 44:6 51:8 52:2 53:5 60:1 61:1,15 62:13 76:13,13 77:8,8,11 106:10 106:13,14 108:1 108:3 121:23 128:1 150:24 211:20 day's 150:13 day-to-day 43:17 77:4 days 4:19 26:24 34:4 58:19 63:10 67:25 68:4 93:15 93:16 96:9,17 171:11 197:6 213:6 DCF1 118:14	DCF9s 140:6 144:10 DCM 10:13 11:21 34:22 40:5,20,22 40:23 43:23 44:3 44:13,15 45:3 47:25 48:6 51:10 52:24 74:19,22 75:3 87:1 90:21 98:21 118:20 121:13 122:2 123:8,12 127:15 147:21 154:7,8 DCMs 6:23 10:19 10:24 12:2 15:16 22:1 24:2,8 25:5 27:24 34:13 35:5 35:8,13,20 43:19 44:10 45:9 47:15 68:18 69:17 86:14,25 94:19 121:16 125:4 DCO 1:24 2:5,8 3:6,16 29:9 30:22 31:2,5 34:13,21 38:18 40:5,20,21,21,22 40:22,22,23 47:10,12 51:17 74:12 80:11,15 80:21 144:23 145:11 154:2 DCOs 98:20 DD 106:12 121:10 127:18,19,21 de-escalate 113:2 113:6 120:24 de-escalated 120:20 deal 6:12 17:3 26:18 32:10,12 33:21 35:15 52:25 54:17 60:7 60:8 67:3 147:18 dealing 4:7 44:21 162:20 182:24 221:4 dealt 35:23 41:4 66:25 109:16	110:19 167:8 170:18 Dean 7:16 21:13 23:6 68:21 69:3 103:24 145:2 death 102:20 178:23 deaths 178:12,18 December 18:3 decide 88:21 140:9 140:15 decided 72:23 83:7 116:19 140:12 184:21 deciding 216:13 decision 69:10 92:16,20,24 96:23 98:9 108:23 110:1 122:3 125:5 127:5,12 128:17 132:11,13,15 167:22 168:15,18 169:13,14 170:7 173:10,12 174:16 179:2 185:17 192:22,22 decisions 133:6 157:14 166:19,23 167:6 168:22 169:6 170:11 172:22 173:12 193:2 194:7 206:12 207:25 215:16 224:8 decisions/the 92:13 declaration 215:3 declaring 215:13 dedicated 36:18 36:22 deemed 157:9 default 126:1 166:4 defects 161:21 221:5 defending 42:8 defensive 42:4,7 42:10,16,18,19
--	--	--	---	--

42:20 103:9,12 103:22,25 deficiencies 221:3 defined 80:6 186:21 definitely 88:3 100:2 101:1 110:23 113:25 138:21 148:25 149:8 definition 124:14 175:4 176:7 182:20 185:6,11 185:16,17 186:6 186:11,18 187:3 187:8,11,12,21 degree 77:12 174:6 178:25 181:15 191:14 201:20 dehumanisation 220:24 delay 87:20 183:7 delayed 70:15,20 delaying 197:9 delays 196:18 217:19 deliberate 107:7 107:15 delicate 183:25 deliver 26:17 97:10 117:7 delivered 149:18 199:25 delivering 28:15 delivery 72:12,14 Delta 51:9,10,16 demanding 30:23 52:1 demands 6:6 72:12 Demian 16:16 72:3 demonstrated 66:20 demonstrating 59:3 demoralising 97:15	demoted 69:21 71:4 demotion 3:19 denoted 75:19 deny 146:15 dep 133:3 142:17 142:24 department 15:3 44:22 67:10 135:19 177:24 212:22 223:15 department's 177:4 departmental 141:6 departments 44:19 156:15 departure 69:13 depend 171:25 depended 18:20 dependent 126:20 depending 64:11 99:10 depends 119:8 120:19 125:10 127:7 deputy 2:8 15:19 16:7,19,23 17:2,7 17:7,15 78:22,22 143:2 describe 14:10 23:20 139:22 described 38:24 161:25 167:6 214:1 describes 15:8 37:24 description 15:18 88:15,20 89:4 descriptive 144:9 designed 169:1 190:25 218:24 219:22 220:12 desire 26:15,21,24 27:4,4 138:17 183:6,7 despite 72:17 85:10,17 184:23 184:24 207:22	217:23 detail 49:18,18,21 76:18 77:23 85:23 104:21 128:6 138:1 159:18 160:20 162:19 170:5 175:14 200:10 211:10 215:7 detailed 83:2 159:5 details 126:14 134:21 215:4 detain 157:14,15 169:7,7 194:7 detained 12:19 49:10 56:6,17 59:10 61:4 62:19 100:4 122:15 123:20,21 143:19 160:8 167:2 190:6 195:23 212:11 225:17,19 detainee 3:25 7:1 10:22 29:24 30:7 30:16,22,23 31:3 31:6,9 33:18 34:12 36:16 40:23,25 43:14 63:2 80:1 106:21 130:14,21 132:2 132:6,18 133:15 134:1,5,13 135:9 136:1,23 137:10 137:19,23 144:20 193:13 194:5 202:23 219:14 220:8 detainee's 218:16 detainees 3:14 4:4 4:9 6:6,12,14 18:24 19:5,14,20 20:6,13,15 25:17 25:23 29:6 30:1 30:20 31:20,21 32:1,9,12,16,22 33:4,6,7,13,17,22 34:2,8 37:1 52:6 56:24 57:1,25	58:7,8,11,12,12 58:14 61:11,22 72:15 74:13 118:12 132:3 136:4,18 148:9 160:1 161:1 166:9,15,24 170:3 181:8 191:25 206:8,20 211:6 217:24 218:9,18 219:18 220:25 221:4,7 detainees' 32:25 166:7 204:16 detention 3:13 29:21 31:18 105:7 122:20 123:3 134:18,20 157:10 158:11,13 159:12,18 160:14 161:2 162:14 164:13,18 165:6 165:15,20,25 166:19,20,23 167:3,18 168:8 168:22 170:10 172:21,25 173:20 175:22,25 176:19 178:13,19 179:3 179:25 180:12,22 181:21 182:2,13 186:20 188:21 189:1,2,3,19,21 189:24 190:6 191:8,25 192:1 192:12 193:6,23 193:24 194:2,6,9 194:11,25 195:2 195:6,10,11,12 195:15,15,16,17 195:19,20 196:2 196:11 197:4,5 197:11 198:10,24 202:13,15,24 203:1,4,6,14,24 204:10 205:14 206:13,25 207:11 208:1 210:19 213:9,12 215:16	218:10 219:1 220:17 222:12 223:6,10,14,20 224:1,3,8,9,13,14 224:16,24 225:6 225:15,18 detention' 180:6 deter 42:21 deterioration 167:18 168:8 218:15,22 develop 26:15,21 26:24 27:4,9 169:17 171:17 179:1 developed 44:25 192:25 developing 157:13 169:5 173:2,4 208:11 development 72:17 169:9,11 169:15 183:20 202:3,6 222:2 DH 53:18 diagnose 150:4 diagnosis 180:10 Dicks 51:10,17 die 114:7 died 102:20 differ 77:4 difference 21:18 94:13 99:13 136:12 different 13:14,17 13:24 14:2 32:19 44:19 76:14,15 83:24 85:12,16 89:21 90:4 94:4 99:18 109:24,25 117:6 118:5 121:20 128:8 142:4 146:21 152:4,16 156:15 156:18 184:21 187:11,24 188:2 198:16,16 differently 11:3,17 40:2 86:5 109:16
---	---	--	--	--

110:20,24 114:1 difficult 25:17 34:25 45:16,23 65:23 88:22 89:3 94:16 95:25 96:22,25 97:2 98:9,22 100:14 100:17 102:10 104:1 143:21,25 150:1 154:13 difficulties 43:24 45:9,13 165:13 180:13 difficulty 43:22 dignity 36:17 37:2 direct 17:1 71:21 71:25 82:16 157:3 221:24 directed 103:17 direction 110:4 131:7 directly 17:5,11 18:14 41:15 148:24 166:12 178:20 179:5 181:11 224:19 director 4:14,15 13:18 14:16 15:5 15:19 16:5,6,7,7 16:19,23 17:2,6,7 17:15 28:23 66:9 76:25 77:1,3,6,12 77:17 90:14 101:12 108:1,3 118:24 126:3 127:25 128:2,3 142:24 143:2 153:6 director-general's 158:6 directors 4:18,22 dirty 24:25,25 25:20 disabilities 189:15 disability 165:9 206:9 disadvantage 206:11 disagree 37:20	137:8 164:5 192:16 209:18 218:20 disappeared 114:21 disbelief 217:3 discharge 108:7 disciplinaries 4:7 38:8 71:8 disciplinary 67:6 67:13,14 86:19 144:15,24 145:1 145:5 146:5,9,11 146:18,20,24 147:4,6,11,15,23 174:15 disclosures 196:16 disconnect 201:16 201:23 209:25 discouraged 205:8 discrimination 206:8 discuss 45:13 77:25 88:12 101:14 118:6 119:8,9 126:13 137:4 discussed 6:23 16:18 23:16 83:5 83:6 84:19 90:23 91:22 149:25 160:19 discussing 100:24 discussion 95:15 119:17,20 discussions 63:25 92:3 138:22 139:6,15 disgusted 29:15,17 33:20 disgusting 34:3 disorder 180:11 displaced 154:18 dispute 186:2 disregarded 211:14,16,24 212:11 disrespectful 148:9	disruption 120:21 121:2,23 124:1,2 124:4,11,22 125:2,9,20 disruptive 120:14 120:18 disseminated 175:23 distance 162:4 distinction 113:14 Distressed 114:13 Dix 118:17,17,20 119:3 121:12 123:4 124:19 125:15 129:1 DL0000141 10:8 36:6 doctor 198:22 doctors 181:3 196:13 198:8,16 199:9 200:12 202:18 205:1 220:15 document 10:7 50:23 63:19 68:15 120:8,13 122:10 153:15 191:15 documentation 69:16 105:18 164:7 documented 133:23 documents 73:23 84:22 128:14 175:21 doing 4:13 8:15 23:25 24:1,21 27:21 33:17 41:10 42:23 43:2 44:24 46:19 52:3 64:1 76:13 77:12 88:22 90:12 97:10,18 98:4 102:19 103:20 110:22 123:13 159:16 173:25 186:9 188:1 DOM 90:20,21	122:2 123:8 154:6 dominant 10:25 DOMs 90:16,16 94:19 101:2 Donnelly 87:6,12 87:17 108:10 door 38:23 39:6 52:2,2 98:6 doors 43:4 doubled 99:9 downhill 33:19 dozed 22:16,17 Dr 199:16,22,23 200:2,6,6 202:19 202:20 221:16 222:1 drafted 206:2 drafting 205:23 draining 53:25 dramatic 217:20 draw 99:13 113:14 218:7 drawing 169:9,15 drawn-out 174:12 183:21 dressed 129:14 drives 55:4,9 155:6 drop 136:5,12 drop-in 133:17,22 135:25 136:24 drop-ins 135:10 135:24 138:23 139:1,7,16 drop-off 94:10 dropped 108:18 111:19 112:1 drugs 63:19 65:1,8 65:13 66:16,21 66:22 DSO 90:6 122:8,10 140:4 141:3 153:15 206:2 207:9,18 208:1 DSO04 205:23 DSOs 208:11 due 44:9 48:16,25 61:12,25 69:22	70:10 72:11 105:11 118:12 120:2 125:19 144:24 145:10 178:23 189:19 Dungavel 222:4 duties 4:25 160:24 206:7 duty 4:14,15,18,21 13:18 14:16,16 15:5 16:5,6,7 17:6 28:23 76:25 77:1,3,6,12 108:1 108:3 118:24 126:3 127:25 128:2,3 194:24 195:8 223:13,16 223:18,25 224:6 dynamic 37:10 165:4 180:20 218:24 dysfunctional 217:18 dysfunctionally 218:2 dyslexia 28:5
E				
E 29:24 125:21 151:4 226:16 E1 15:16 75:1,2,3 75:6,21 76:24 E1s 15:1 E2 15:16 earlier 26:3 43:23 56:9 129:10 221:14 224:21 early 18:3 26:24 34:4 55:13 63:10 152:3 171:11 197:13 224:23 easier 13:3 55:4 96:11 224:18 easy 44:8 73:8 184:1 eating 62:11,12 63:3 Ed 18:15 29:9,18 38:18,18 39:2,11 EDR 39:10 47:3,4				

47:6,12 EDRs 27:7 47:14 education 4:4 93:12 Edwards 4:24 effect 49:9 56:18 95:5 169:19 189:4 190:25 effective 23:20 61:19,20,21 effectively 111:20 177:12 182:14,21 188:4 189:10 191:6 194:23 197:16 200:24 201:1 206:17 211:13,17 213:24 213:25 215:2 219:7 efficacy 151:20 effort 64:19 egregious 34:11 EIG 180:7,15,19 191:10 eight 77:2 198:2,3 either 23:10 121:21 123:21 170:19 173:11 194:18 212:2 216:21 219:6 224:12 elderly 180:16 element 81:1,5 161:14 168:16,17 220:14 elements 119:9 162:8 email 24:23 102:3 132:10 200:5 emails 25:1 221:20 222:1 emanating 138:8 embody 36:16 embraced 10:17 embracing 72:16 emerge 225:5 employed 214:6 employing 186:15 employment 21:4	empty 139:2 emptying 25:22 encompass 165:5 180:21 encourage 203:11 204:8 encouraged 205:5 205:8 encourages 202:25 203:13 end-of-month 79:22 85:13 ended 74:22 endowed 20:4 enforced 116:16 enforcement 170:20 176:23 178:4 199:25 222:15 engage 124:4 160:19 172:5 engaged 103:7,24 160:19 engagement 26:20 53:12 113:2 177:14 222:2 engaging 112:24 English 61:5,14 enhanced 190:9 enquiries 52:6 ensure 85:23 104:8 140:3,5 192:12 194:4 203:9 204:5 206:10 ensured 140:3 ensuring 174:22 entail 140:2 enter 108:12 entered 109:22 entering 87:13 entirely 63:15 82:9 entitled 121:16 entity 134:6 environment 12:22 13:2 14:3 32:18 160:15 EO 185:16 187:11 187:16,21,25	equalities 160:24 equality 161:7 206:7 Equally 92:8 equate 164:19 equivalent 93:19 94:18 error 88:6,7 107:8 errors 107:5,14,15 escalation 111:13 escort 53:6 116:22 116:23 117:12 escorting 117:8 escorts 49:3 especially 42:7 86:14 151:23 171:11 183:23 essence 78:7 essentially 6:20 8:22 26:12 179:8 184:19 209:7 established 51:17 149:24 et 78:24 80:19 118:16 136:20 189:15 event 85:19 87:19 99:23 107:24 116:7 118:5,8 129:11 144:13 events 80:5,19 82:8 83:3 85:9 eventually 71:18 everybody 1:12 209:9 everyday 154:21 evidence 8:19 19:21 29:7,21 34:9 36:4 38:18 41:3,14,16 44:10 73:9,16 74:5 87:5,7 101:25 117:22 118:3 125:15 130:21 138:14 139:24 141:13,15 147:12 148:3 155:11,15 156:6,7 164:5 188:6,14,15,17	188:24 190:4 191:5 192:20 196:8 199:16,22 202:20 204:13 206:16 209:15 210:18 211:11 214:25 215:12 216:5 219:11,12 219:13,22,24,25 220:1,2,6,7,14,22 221:14,17 226:8 exact 126:15 183:10 198:8 exactly 35:6 81:11 198:11 examination 1:4 73:19 155:23 193:13 223:3 226:20,24 227:5 227:9 examiners 181:5 example 21:6 38:23 44:11 46:13 62:19 78:15 79:25 80:20 81:24 84:1 84:7 85:9,14 86:24 87:5 122:25 123:1 124:19 171:13,17 174:15,25 176:6 181:4 185:21,24 186:2 187:17 190:11 201:17 207:14 212:19,20 examples 137:2 222:4 exceptional 96:14 189:22,23 190:19 exchanges 200:5 exclusion 179:25 180:2,2 excuse 150:14 executive 156:18 156:19,19 exercise 8:22 exist 196:4 existed 168:22 existence 36:5	194:24 195:8 existing 151:1,3 184:19 185:16 186:5 211:20 220:22 expanded 200:8 expanding 210:23 expect 20:5 119:25 expectation 199:8 199:11 222:5 expectations 23:22 expected 47:10 127:15 194:15 213:22 expecting 17:21 expense 10:22 13:11 experience 35:1 41:20,21 60:13 60:14 73:8 89:21 158:12 169:10 183:20 196:14 209:4 experienced 11:12 26:13 31:16,25 experiences 169:14 expert 105:6 expert's 114:19 expertise 158:12 experts 84:13 explain 11:4 25:15 67:20 205:16 208:22 explanation 70:9 219:5 explicit 95:12 222:4 explicitly 168:6 204:20 explored 215:16 expressed 209:13 expressing 221:21 expression 209:1 expressly 196:21 200:21 221:23 extensions 28:18 28:19 extent 12:11,21
--	---	--	--	--

111:4 162:10 192:19 external 18:7 24:1 53:6 97:8 101:23 169:25 210:17 externally 2:23 19:12 36:2 69:6 69:8,10 extra 8:25 55:11 55:21,25,25 56:2 56:3,12,15,17 64:2,4 190:7 extremely 65:1 eye 173:17,24	82:23 85:6 86:4 86:17,20 87:25 88:5 103:2 165:12 168:13 171:20 174:23 219:10 220:5 failures 86:5 145:10 160:13 167:21 168:19,20 170:9 178:14,16 178:23 fair 135:3 fairly 144:9 172:3 194:10 faith 26:16 fall 22:15,16 76:2 169:18 172:13 194:20 201:9 fallback 225:21 fallen 25:4 213:21 falls 90:7 201:18 families 11:10,16 12:21,23,24 family 105:13 far 15:6 22:7 39:14 40:7,9 48:7 71:2 105:13 123:6 146:15 148:4,7 151:18 167:1 182:10 199:3 200:24 205:7 214:17 farmer 186:2,2,3,4 Farrell 105:4 107:10,16 fat 25:18 fault 110:17 favoured 37:10 features 167:15 168:3,14 February 3:9 20:25 53:10 74:25 87:7 fed 102:17 162:8 171:22 feed 79:11 170:7 170:19 173:19 175:17 222:7 feedback 49:24	53:17 177:6 feeding 33:3 170:10 176:18 177:24 feel 20:9,16 55:1 60:10 73:1 90:3 96:17 98:19 132:16 146:14 151:21 feeling 96:15 103:23 138:21 fell 21:10 22:24 26:7 60:22 80:15 141:3 145:2 189:17 fella's 186:7 felt 10:20 13:6 20:18,20 33:13 35:18 37:6 52:12 58:16 133:10 145:25,25 148:14 170:17 174:1 195:25 females 21:12 23:3 fewer 167:1 Fiddy 29:9,18,24 38:18,18 39:2,8 39:11 figure 38:25 fill 44:22 62:15 69:18 202:1 filled 71:22 114:20 final 68:9 finally 69:13 72:6 126:12 220:21 financial 78:13 financially 92:24 find 17:16 27:2,23 44:6 49:21 52:24 120:24 146:2,3 154:14 187:23 188:1 223:18 finding 27:20,21 46:19 147:11 159:15 163:19,22 164:8,9 165:16 175:9 219:19 findings 114:19 147:13 162:21,22	162:25 165:22 170:8 175:13 178:13 181:18 214:9,18 fine 51:18 87:24 90:22 123:16 128:5 150:18 finessing 184:19 finish 30:17 46:21 firms 213:5 first 1:16,22 3:2,23 5:3 6:19,21 7:23 7:24 8:18 12:15 14:5 29:2 31:12 31:14,16,22,23 32:6 34:5 36:7 47:12 56:24 57:8 57:11,19,20,21 58:17 62:18 65:10 67:7 68:8 78:1 84:6 108:17 110:9 123:16 130:16 137:3,10 145:13 150:10,15 150:16,22 168:3 171:9 179:16 189:2 194:13 216:9 217:5 219:21 222:9 firstly 6:18 8:2 37:21 47:3 five 70:17 93:15 187:22 flawed 187:23 flexible 218:24 floor 25:20 128:12 fluctuated 95:2 fluid 62:18 63:8 81:12 208:11,18 focus 53:13 74:6 77:12 132:3 220:12 focused 162:15 164:9 focusing 153:9 220:15 folder 73:23 follow 45:2 81:22 82:18 88:1	131:18 174:14 follow-up 222:24 followed 62:19 104:4,19 140:4 following 23:25 64:16,23 82:20 102:22 106:18 196:8 206:16 217:11,12 food 19:1 62:3,5 62:12,14,18,20 63:3,3,9 208:11 208:18 footage 8:21,23 105:4,9 107:16 107:22,22 110:3 118:10 148:6 220:25 force 7:2,22,24 8:5 8:8,18,25 10:6,15 80:18 105:18 106:1,16 108:25 109:3 110:2,7 114:20,22,23,24 114:25 115:1,2,3 115:4,11,14,15 116:2,5,6,8,8,9 116:12,13,21,25 117:1,10,11,16 128:5,15 129:19 130:12 142:6 149:10 167:19 forensic 181:4 forget 41:12 219:21 forgetting 146:1 forgive 170:16 178:3 216:23 forgot 145:5,7,13 146:12 forgotten 143:4 146:17 172:13 form 114:20,22 115:8,13 118:14 121:12 122:19 191:18 192:22 formal 67:15 121:10 173:25 204:25 205:1
---	---	--	--	---

formalise 98:22	friendly 68:18	190:10 196:17	125:21 127:14,15	79:24 80:9,25
forms 87:19 128:5	friends 32:18,19	198:23 202:22	128:20 130:11	85:14 86:8 98:3
164:7 202:14	32:19 37:15,22	223:3 227:9	140:11,11 143:3	102:16 105:11
formulated 170:6	37:25 68:22		143:5 144:8	106:16 113:15
204:19	froing 26:2	G	160:16	114:8 119:16
formulating 170:2	front 38:22,24	G 78:4,7 81:20	generate 63:4	122:5,16 123:16
177:7 196:20	39:5 105:19	84:23	147:12	125:18,21 126:2
formulation 163:2	front-line 32:10	G4S 2:3 7:10	generated 79:13	126:7 127:9
163:5 178:21	fruitless 34:20	72:16 75:14	86:20 147:3	128:25 137:14
186:16 190:20	frustrated 48:1	89:10 91:10 92:8	genuine 42:22	140:13,15,17
191:13 192:5	frustration 97:2	92:23 104:16,17	genuinely 21:18	144:12,24 171:4
200:19 209:19	97:17 100:9	133:24 135:4,16	getting 12:2 33:10	184:21 187:1
210:10	frustrations 26:13	139:7 147:4	98:1 100:9	205:7 211:10
forward 12:14	72:15	175:19	146:11 151:1	219:21
27:3 33:2 35:22	FTE 93:19	G4S/Serco 129:23	152:23 201:6	goal 182:11
42:22 43:9	fucking 29:23	gain 11:15 121:5	219:6	goes 52:9 65:6
102:14 163:9	fulfil 125:1	games 18:23 19:4	Gibbs 222:20,21	123:23 126:1
forwarding 144:2	fulfilled 84:23	gap 108:25 109:10	Giraldo 47:23,25	153:1 190:4
fostered 37:12	fulfilling 85:19	206:17 207:22	48:6	going 3:13 6:13
foul 169:18	full 1:7 63:24 64:1	208:4	give 1:7 3:1 26:5	19:22 20:21
found 5:16 13:17	64:3 73:21 74:2	Gasson 77:23	27:7 33:6 45:1	28:22 29:16
32:18,18 61:21	93:19 95:6,17	130:19 131:12,24	46:2 79:25	31:20 34:15,19
68:6 84:21	120:18 126:18	139:10	127:15 129:3,7	34:21 37:4 46:16
128:13 154:15	127:1 128:5,13	gate 225:25	152:21 155:24	50:11 51:12,15
160:7,13 163:16	128:17,21 129:19	gatekeeper 224:24	185:21 201:24	51:16 52:15,24
165:12,20 166:8	137:6 150:7	gather 26:1 225:9	given 5:6,10 18:20	53:1 55:11 59:8
166:15 167:15	155:24 156:6	Gatwick 3:6 36:12	43:6,7 67:9 70:9	69:21 74:6 95:17
168:2,7 173:12	177:20	66:10 67:18	71:15 73:9 83:18	104:11,13 105:12
174:2,20 183:20	full-time 93:19	77:18,19 130:14	84:12 87:9	108:15 109:24,25
187:8,22 189:25	94:18	130:21 132:2,5	105:25 106:17	110:16 111:14
206:6,24 209:12	fully 143:19	132:18 133:15	111:18 115:18	113:6 114:3
218:8,14 219:9	154:23	134:1,5 135:9,25	140:9 145:4	122:9 126:7,10
223:14,17	function 79:2,9,23	136:23 137:10,19	146:8 148:4	132:13 141:24
foundation 179:8	83:13 89:16 90:7	GDWG 131:22	162:6 183:5	143:13 149:6
four 4:1 6:21	103:3,16	133:5,9 134:11	204:6 207:17	151:15 154:19
50:14,14 90:17	functional 79:21	134:13 139:8,18	208:24 209:15,22	156:4,5 159:16
99:10,11,23	81:4,14 89:23	gender-based	210:8 223:9,24	167:3,16 170:15
106:25 154:5	102:4,11,12,15	179:23	224:5	185:12,13 190:10
187:21	102:18 103:7	general 6:18 29:5	gives 119:4 151:11	195:15 220:17
four-hour 149:20	140:13,17	80:6 88:12 101:5	giving 33:3 42:5	good 1:5 13:18
fourthly 7:2	functions 76:16	103:5 121:7	42:13	20:2 50:7 73:16
framework 157:13	79:11 83:24	125:22 140:12	go 11:14,18 17:5	73:20 102:13
166:18 167:6	84:12 90:5 157:3	164:24 165:24	19:13,20 21:2,24	103:14,24 117:21
210:18	200:12,13	179:18 218:21	27:3,8 30:19	152:16 159:19
free 108:19 136:1	funeral 105:11	generally 67:8	37:16 41:22	164:20 177:13
Freedom 211:2	further 3:19 35:7	77:1 79:9 84:11	46:17 49:18 51:5	199:9 222:15
frequent 126:9	72:17,19 147:15	98:14,16 103:22	51:11,15 63:8,21	224:21
194:10	165:2 171:17	105:23 107:20	64:13 66:7 74:4	Gosh 220:2
Friday 199:22	180:18 189:13	119:15 121:20	75:12 78:3,19	Goulder 139:25
		122:2 123:21		

143:17 146:22 governance 90:15 GPs 163:23 204:13 217:19 221:21,24 222:3 grade 15:1,15,16 15:17 75:20 81:17 156:20,21 178:1 grades 15:2 17:25 gradual 95:14 graffiti 6:15 25:22 Graham 34:18 36:1,2,3 37:7,18 38:11 grateful 73:8 155:10 226:8 great 1:13 53:18 53:22,23 104:21 138:1 greater 55:21 70:4 112:19 grey 199:6 grievance 44:23 68:13 144:25 145:1 146:4 grievances 44:21 44:21 67:6,13 70:2,14 142:6 ground 77:13 78:4 148:15 175:18 177:10 219:7 grounds 206:9 group 2:2 37:9 60:21 130:14,22 132:2,19 133:15 134:1,5 135:9 136:1,24 137:11 137:19 151:24 Group's 132:6 groups 14:25 53:13 132:3 growing 159:25 grunt 21:14 grunted 23:10 grunting 23:6 grunts 21:14 guarantee 99:20 guaranteed 97:12	guess 201:20 219:8 222:6 guessing 120:11 guidance 132:11 191:17 193:5,6 206:25 guilty 68:6 gut 145:20 guys 79:8 110:21 gym 49:13 <hr/> H HA 160:6 half 1:24 2:7 109:20 half-addresses 220:18 hall 136:14,23 hand 116:21,23 127:13 handcuffs 105:22 105:24 handed 117:11 handle 108:17 handling 140:22 handover 106:12 114:17 handrail 108:19 112:14 hands 63:15 107:6 handy 20:2 Hanford 14:10,11 14:19,21 15:8 17:18 18:15 27:11 56:5 66:9 66:14 71:22 72:6 72:22 150:9 Hanford's 27:22 hang 87:11 happen 30:13 34:22 36:18,23 48:24 51:12 83:14,15 99:22 99:23 104:13 109:24 110:16 139:19 142:12 146:16 225:11 happened 21:4 49:19 50:18 69:22 87:20	112:1 115:21 117:16 118:8 119:9,22,22 143:8 159:14 175:5 183:9 208:8 happening 49:1 67:4 95:22 140:14 149:13 175:6 185:19 198:12 213:25 225:15 happy 33:9 39:11 39:14 150:6 158:9 hard 65:2 146:4 149:13 harder 54:4 Hardial 189:5 Harkness 43:21 44:1 45:12,19 46:25 47:21 harm 126:25 137:15 166:25 186:19 187:2 190:4,6 191:5,24 191:24 192:2,12 192:20 193:23 209:6 213:12 215:6,12 216:9 216:14,21 219:3 220:12,17 224:15 harmed 114:4 197:10 205:13 225:18 harmful 165:20 209:15 Harmondsworth 222:3 hassling 17:6 hatred/dislike 32:7 Haughton 4:23 53:18 73:17,18 73:20,22 74:3 117:23,24 118:3 118:4,21 145:4 153:21,23 226:22 head 15:13,15,20	16:16 59:5 67:10 67:10 71:18,24 75:15,18 78:23 81:5,14 92:17,24 93:19 94:18 95:2 95:2,6,17 98:23 102:11,15 104:25 110:8 112:1,2,11 140:13,18 146:22 222:10 heading 48:15 92:13 heads 15:3 79:21 81:5 89:23 102:4 102:12,18 103:7 141:6 health 56:23 57:6 58:5,18 59:5,18 59:20 60:3,15 75:24 76:17 135:11 149:15,19 149:23,25 150:10 150:15,15 151:8 151:11,25 160:15 161:19 165:21 166:1,5,6,9,16 190:12,13,15 191:12,12 198:9 198:23 199:13 201:12,13 202:13 202:23 205:13 208:20,21 210:23 healthcare 6:24 57:3 58:2 59:20 60:23,25 61:6 82:15 106:15,19 113:8,12,18,20 114:2 118:25 135:19 153:2 161:20 175:19,23 196:13 205:11 212:22 213:17 216:13,18,18,19 216:19 217:3 219:2 222:14 hear 1:13,14 30:3 31:2 40:15 144:7 144:8 174:7 226:7	heard 8:19 29:7,21 30:2 34:9 40:16 40:17,24 41:1,4,7 44:10 56:5 75:3 77:21,22 78:2 80:15 84:19 105:2 114:7 116:1 121:13 130:19 141:13 145:3,13,16 148:6,13,22,24 149:14,25 196:13 204:13 206:16 211:2,11 220:21 221:16 222:16 hearing 1:5 59:5 116:4 147:11 175:10 226:12 heavy 6:7 hefty 50:6 heighten 112:24 held 10:4 164:18 181:8 189:21 help 12:14 27:9 28:8 46:2,18 52:6 61:5 64:11 70:6 93:1 94:13 100:2 126:13 127:17 helped 12:1 149:5 151:21 helpful 1:11 17:10 165:8 185:22 208:23 helpfully 223:1 helping 135:11 helps 149:8 151:8 151:10 hesitate 185:19 Hewer 143:6 hierarchies 37:11 high 95:3 160:6 212:9 215:19 216:22 217:23,24 217:25 219:17 high-level 26:19 higher 14:22 95:4 104:16 156:19 188:24 203:11
--	---	--	---	--

<p>highest-level 104:7 him' 21:16 hindered 88:13 hindsight 112:19 historical 127:14 history 123:7 127:10,16 212:4 HMIP 101:23 104:12 169:22 176:16 217:13 HMPPS 129:25 hoc 9:12 174:5 hold 4:15,19 107:6 132:3 holding 4:7 128:16 192:24 holds 112:9,16,17 holiday 70:18 holistic 153:11 HOM000251 118:14 HOM0332154 156:4 home 6:24 13:24 14:1 15:21 23:25 24:21,24 27:22 30:24,25 32:7,11 33:1,2,8,13 62:9 71:11 78:11,23 79:15 83:1,8 91:5,10,11 92:4,5 95:18,21,22 101:3,4,24 116:19 117:9 118:24 121:25 122:1,17 128:1 131:7,10,16 133:8,25 135:4 135:16,23 138:10 138:17,20 139:8 140:6 141:11 142:3,25 143:5 144:5 156:9,15 156:25 157:8,13 157:24 159:11 160:2,24 161:6 162:1,7,9,13 163:23,25 165:13 169:6 172:1</p>	<p>173:7,16 176:18 176:24 179:9 181:1 183:13 184:21 186:12,14 187:10,13,18,20 187:23 190:1,21 192:23 193:1,4 194:4,19,23 195:7,8,24 196:23 199:5,8 199:17 200:7,8,9 200:14 202:10 205:6,12 206:7 213:14,20,20 214:9,17,20 215:14 223:2,15 224:5,7 225:9,12 homophobic 68:1 honest 17:23 23:20 62:7 168:17 174:1 192:8 honestly 40:18 197:23 hope 75:10 horrible 149:2 horrific 148:17 hospital 82:14,14 hospitalisation 106:23 hot 63:5 100:24 hour 25:17,19 109:20 hours 6:22 51:25 53:24,25 54:7,19 54:22 80:11,15 80:21 83:2 94:25 95:3,7,16 119:1 193:13 hours' 33:6 House 2:12,14,15 3:3 10:13,17,20 10:21 11:22 12:12 13:4,8,9,10 15:14 16:14 18:21 25:11 27:1 31:13,22 33:15 37:12 41:8 42:1 48:5,8 59:23 63:23 65:5 69:14</p>	<p>72:21 74:9,13,23 77:15,20,20 82:24 92:23 99:3 105:8 136:6 139:23 148:7,15 152:9 153:4,24 157:4 158:24 159:1 160:9 199:25 202:19 204:14 217:21 218:19 220:23 HR 39:1,8 44:20 65:15 67:10 146:6 147:7 huge 15:9 human 36:19,24 hurdle 190:7 hurt 127:3 Hutchinson 37:8</p> <hr/> <p style="text-align: center;">I</p> <hr/> <p>Ian 19:24,24 155:21,22 156:1 227:3 ICIBI 169:22 214:7 217:13 ID 43:3 idea 37:3 94:19 102:13 120:8 132:5 143:9 182:1 218:3 ideally 98:21 184:6 ideas 200:4,9,10 ideation 201:4,9 identification 197:9 207:18 identified 62:4 109:23 161:18,23 165:5 167:17 168:4 180:21 194:15 198:13 216:9 217:2,17 identify 82:23 88:5 148:19 149:4,5,8 150:5 151:8,21 153:6 160:13 193:22 219:10 220:5 identifying 97:8</p>	<p>151:7 161:20 194:1 207:10 212:10 ignorance 62:25 ignore 105:21 ignoring 187:25 ill 145:2 161:1 210:7 ill-health 60:12 160:14 161:21 164:13 202:14 illness 164:18 167:17,19 168:4 168:9 180:8 IMB 6:24 15:21 82:2 85:15 101:23 118:24 169:22 176:17 217:13 218:14 219:9 immediate 213:8,8 immediately 87:18 175:2 176:12 181:1 212:22 213:18 immerse 159:17 immersed 162:16 immigration 105:7 157:4 159:12,18 160:1 170:20 175:24,25 176:23 178:4,13,19 179:3 183:23,25 188:25 190:23 193:4,6 198:17 199:25 210:22 222:14 impact 10:15 19:5 49:8 56:21 69:1 70:4 88:19,23 101:6 124:3 152:8 161:7 165:25 182:16 202:23 212:23 impending 33:6 implement 12:5 170:9 171:20 implementation 170:21 173:13</p>	<p>174:21 176:10 181:12 implemented 170:13 171:3 175:2 182:8 184:9,23 196:24 196:25 implications 181:6 importance 40:1 193:21 223:5 important 159:20 162:25 166:22 178:21 194:4 195:13 199:7 201:8 212:6 224:3 226:7 Importantly 168:12 imposed 210:9 imposition 223:16 impression 21:25 22:4,5 55:23 148:14 193:25 impressionistic 182:17 improve 132:5 153:8,13 182:4 improved 31:14 31:15 155:3 improvements 181:22 improves 100:4 improving 200:4 impunity 37:13 in-between 17:4 in-house 57:17 inaction 89:3 inadequate 161:19 161:19 inappropriate 144:22 inappropriately 37:6 148:25 167:20 170:18 inasmuch 218:20 inaudible 28:9,16 incentivise 209:6 incident 8:3 39:4 82:21,25 87:11</p>
--	--	---	---	---

105:1,16,17 106:8,20 109:6 109:20 113:2,3 119:12,19 120:8 121:21 122:4 125:5,25 126:22 incidents 10:16 52:12 77:9 81:18 137:17 167:19 include 15:5 54:14 115:13 121:1 123:25 180:16 181:3 included 14:15 67:11 68:14 76:25 88:14 158:20 167:16 169:15 217:12,13 including 29:6,22 151:25 204:16 205:13 210:21 217:24 inconsistency 168:23 169:2 inconsistent 190:20 incorrectly 39:6 increase 12:21 28:9 55:4,16 91:18 92:6,9,10 99:25 151:10 217:20 increased 91:23 92:25 increasing 72:11 92:3 182:16 incur 95:8 incurred 80:10 independent 169:21 181:4 188:15,17 200:13 206:20 215:11 216:5 indicate 187:13 224:7,10 indicated 188:12 193:20 indicating 217:25 indicative 185:24	201:11 208:20 indicators 142:4 149:11 188:6 191:5 192:20 209:2 individual 89:23 141:20 142:7 157:14,15 160:8 167:22 168:15,20 170:7 171:13 172:9 173:11 174:16 177:4 194:2,18 195:18 198:19 199:14 201:11 203:10 204:6 209:6 210:5 213:8,11 214:22 215:6 216:20 219:3 220:13,16 individual's 198:9 198:23 199:13 218:17,23 219:23 224:22 225:4 individuals 158:16 174:13 179:22 188:9,11 190:11 197:12 207:11 216:11 industries 155:2 inevitably 216:21 inexperienced 31:18,23 inference 218:7 inform 144:5 159:10 175:17 information 17:14 17:16 33:3 43:15 65:12 66:2 71:15 79:18 83:18 84:17 127:4,13 129:5,8 135:18 137:9,11 171:21 175:7 199:1,7 219:6 221:17 224:22 225:3,10 informed 119:6,7 119:23,24 174:23 informing 21:3	163:1 inherently 189:18 190:5,24 192:1 initial 97:4,4 110:5 119:1 145:20 175:9 initially 167:2 initiate 108:25 110:2 initiating 109:2 injuries 106:21,22 injurious 165:7 180:23 injury 81:2,6,19 82:6,13 84:8,22 85:6 87:21 112:2 116:3 inner 37:14,24 38:5 input 101:24 153:2 inputs 82:7 INQ000060 179:14 INQ000106 35:3 INQ000163 38:20 INQ000164 7:8 26:10 INQ000166 1:20 INQ000170 1:20 INQ00164 47:25 inquests 178:12 inquiry 1:8,16 10:9 29:22 30:2 36:8 38:19 44:11 73:9 74:1 105:6 118:10 125:15 144:15 145:8 148:4 150:1 155:24 156:3 161:16,18 162:2 206:16 220:21 inquiry's 114:19 inside 34:22 insight 151:12 inspecting 4:9 inspection 23:25 24:1 176:20 214:7 inspections 169:21	176:16 instance 51:8 121:21 126:25 instantly 126:2 instigating 112:4 instigation 115:11 instinct 111:5 145:20 institute 11:9 institutionalised 220:24 Instone-Brewer 44:11 68:15,20 144:14,18,25 instruction 117:9 146:9 instructor 7:24 8:2 8:6,8,19 insurance 167:1 Intel 63:23 intelligence 67:3 intend 112:5 intended 110:7 163:18 intent 110:2 112:23 174:22 185:18 186:8 intention 83:12 109:4,9 110:6 111:9 114:23 115:5,16 116:4,6 intentions 203:19 203:23 204:9,17 interaction 152:17 interest 109:8 interesting 191:10 interests 111:1 112:23 123:19 124:5,9 interim 66:9 175:11 176:11 internal 101:21 147:4 173:7 internally 2:24 139:7 interpretation 115:20 124:14 interpreting 61:17 204:12	interrupt 186:25 interrupting 212:18 intervals 194:10 intervene 196:3 interview 15:8 17:18 18:16 19:23,24 20:24 44:1,7 45:14 46:25 48:3 50:25 63:7 66:6 144:16 interviewing 67:12 interviews 43:21 introduced 55:14 56:7 150:9,25 introduction 133:19 149:23 160:25 210:17 217:11 investigate 140:9 143:19 144:3 145:7 214:9 investigated 86:18 140:6 144:23 147:2 214:17 215:14 216:6 investigating 143:18 147:22 investigation 25:2 25:3 28:4 65:1 67:15,17,20 68:5 71:7 82:22 144:4 146:20,21 147:10 147:21 investigations 4:7 13:19 24:6,14 25:1 28:4,16,17 28:24 38:7 65:21 67:9 70:1,13,14 70:19,24 82:20 83:6,7,9 145:10 174:15 investment 72:16 invoke 120:3 invoked 121:20 involve 169:9 involved 6:18 67:15 86:14 91:12 93:8 109:8
---	---	---	--	---

113:22 149:9 157:21 169:12,20 178:20 202:2,7 205:22 210:12 224:19 involvement 67:1 144:14 158:20 209:19 involves 3:12 82:17 involving 87:21,25 105:2 118:5 220:23 IRC 2:11 12:15 181:4 193:14 199:9 216:13 IRC's 212:22 IRCs 3:13,21 36:12 158:20 181:9,16 205:11 218:9 221:21 222:11,14 issue 7:11,19 18:17 18:18 19:18 25:11 30:20 36:13 39:24 49:19,20 50:4,11 50:18 52:17 91:20 103:13,14 135:23 147:9 160:20 161:3,5 164:8 166:21 191:10 213:9 220:16 224:19 issued 38:8 68:8 146:3,5,8 147:14 147:18 173:11 issues 7:25 8:3,5,6 9:4,4,6,7,8 17:9,9 17:12 18:12 19:9 23:23 24:8,16,19 29:5 32:12,15 35:16 42:2 43:11 43:13 48:16,18 48:19 52:8 57:2 57:3,5 58:1,2,6 58:18 59:21 60:8 68:19 69:2 70:21 74:7 77:9 79:16	91:22 101:13,18 103:10 125:13 155:7 161:22 162:3,15,16,19 167:8,21 168:13 193:18 197:24 207:13 212:3 ITC 97:11,19,24 149:19 150:25 151:2,19 ITCs 97:5 item 53:10 127:3 <hr/> J Jacks 51:9 James 37:7,18 73:18,22 132:22 138:4,5 139:13 144:23 226:22 James's 133:23 135:2 January 7:9 16:15 18:3 51:6 68:14 72:5 74:10 Jeremy 167:14 Jerry 66:6 67:18 jigsaw 89:22 job 36:18 42:24 46:19 54:4 71:1 77:11 88:15,20 89:4 148:20 152:14 154:21,25 175:10 jobs 36:23 Joe 37:8,19 38:11 John 8:12 Johnson 167:14 Johnson's 168:12 join 13:15 joined 2:2 26:25 74:9 joining 14:1 journalist 7:13 judge's 175:13 judgment 81:1 173:10 174:20 175:11,20 176:11 176:11,13 188:1 206:24 judicially 175:2	Jules 10:19 21:7,9 21:9,11,15 34:17 36:13,16 37:10 37:13 41:25 45:16,23 52:14 65:2,6 66:10 68:18 72:12,15 76:8 140:15 144:24 Julian 1:3,6,9 17:21 226:18 July 3:3 72:18 75:6 78:20 87:12 jumped 118:9 June 78:15,18 81:25 jury 175:5 Justice 175:3,11 176:13 184:8 187:7 196:14,22 206:19 209:14 211:2 Justice's 184:12 justification 116:24 justified 120:16,17 justify 129:8 189:1 JW 48:15 <hr/> K Karen 139:25 140:1,10,11,22 140:23 141:3 146:22 keen 169:17 197:12 keep 1:12 6:14 92:21 98:10 135:6 173:17 203:4,6 218:22 keeping 137:11 189:10 keeps 143:10 KEN000001 41:23 kept 52:15 53:1 60:20 134:12 135:2 173:24 226:4 key 74:7 162:21 163:19 165:1	193:12 207:6 210:16 214:10 Killick 8:14 kind 21:14 27:16 30:3,21 43:13 60:6 76:13 94:10 95:13 108:16 111:13 112:14 125:22 129:14 136:14 141:23 158:16 161:13 171:18 174:1 178:8 183:3 186:4,17 191:17 191:20 199:21 201:2 207:6,14 216:25 220:14,18 222:13 225:20,23 kitchen 19:18 knew 12:4 14:21 31:23 36:2 37:14 44:22,23 66:15 104:2 106:9 112:7 148:21 159:11 161:12 knot 108:18 111:19 know 2:25 5:18 8:1,16,19 12:7,23 17:12 19:24 21:15,18 26:23 30:6,24 35:5,10 36:22,25 37:2 38:4 39:10 40:7 40:9,10 48:6 55:3,9 59:7 63:14 65:11 66:24 67:4,17 69:2 71:2,4 73:7 81:5 82:6,19 84:17 85:4,4,8,10 85:18 86:7,10,12 86:14,21 87:6,23 87:24,24 88:5,6,8 88:9 89:20 93:1 93:2 95:19 96:3 96:9 97:22,24 99:9 100:8,11,23 101:20 102:7,23	102:23,24,25 103:14,15,18,19 108:23,24 109:18 109:22 110:2,3,4 110:15,17 111:25 112:3,20,23 113:1,9,10,11,11 113:24 115:5 117:2,3,4 119:10 120:23 121:7,13 122:4 123:12,14 124:16,18 125:10 125:10,13,13,13 126:18 127:4 128:21,23 129:5 130:2,9,10,24 132:15,17 133:2 133:24 134:21 135:6,6,19 137:23 138:4,5,6 138:6,20 139:4,6 139:13,18 140:22 145:18 146:13,14 146:15 148:23,23 149:7,10,12,13 151:6,14 152:9 152:10 155:1,4,9 157:25 158:17 160:22 162:18 164:1 166:22 174:18 175:1,6 178:21 189:2 190:24 197:21,23 199:9 200:7,17 201:20 204:6 205:16 207:5 209:9 211:19 212:4 214:17 215:4 217:9 220:19 225:2 knowing 45:2 86:13 97:21,22 knowledge 12:14 121:7 146:1 153:14 177:20 204:22 known 68:18 74:18 75:18 104:18 106:7,13
---	--	--	--	---

106:14 114:15 135:20 205:9,10 209:15 knows 82:7 KPIs 89:13	learned 141:9 159:19 169:9,16 learning 7:25 8:3 9:4,7,8 12:2 31:19 42:17 113:24 169:20 178:10 180:13 189:14 leave 43:15 53:7 65:17 66:4 72:21 94:21 96:10 114:12 139:12 143:15 172:5 leaving 121:22 led 10:17 66:25 96:15 223:18 Lee 14:10,11,19,21 15:8 17:18 18:15 27:11,22 56:5 66:9,14 71:22 72:6,22 150:9 left 49:25 50:2,2 56:1,4 63:14 72:18 143:20 144:2,7 146:17 207:15 211:22 left-hand 75:15 legal 133:9 134:2,4 134:5,9 138:13 138:14 186:10 213:5 legislation 174:7 length 53:23 lesbian 67:24 less-pressurised 155:5 lessons 42:17 141:9 169:9,16 169:20 187:14,18 letter 66:3 level 3:16,17,17 10:23 15:2 27:18 49:7 81:16 84:10 85:8,18 86:23 93:12 96:5,6 99:25 102:8 104:17 111:21 124:22 125:19 147:17,19 171:13	172:3 177:24 188:17,21,24 199:15 214:24 215:3,18 216:8 218:17 219:16 220:9 levels 44:9 48:10 55:4 91:18 92:17 92:19 93:11 98:10,17 100:15 100:20,23 188:6 188:14,15,19 200:16 210:22 217:23,24 219:11 219:12,13 220:6 LGBT 158:16 liaison 222:13 library 49:14 lieu 205:18 life 13:15,22,24 100:4 ligature 87:14,16 87:18 88:5 108:15 109:1,5,5 109:10 110:4,6 110:10,13 111:3 111:10 112:13 115:9 116:14 light 107:19,19,20 107:21 lighter 108:25 liked 27:9 likelihood 215:5 215:20,21 216:8 216:14,20 likelihoods 215:19 likes 21:11 limbs 185:18 186:5,10 200:19 201:16 limit 180:17 limited 100:19 204:22 211:14,16 212:12,17 213:2 limits 210:8 line 15:25 23:20 28:9 44:4 47:2 47:15 63:22 71:21 98:18	141:3 156:8 170:19 171:4 190:10 193:7 221:24 lines 51:1 198:10 link 15:9 16:3 17:4 71:21 list 75:23 78:8,21 80:5 153:7 165:3 180:19 190:9 listed 37:22 listen 54:16,21 listened 54:9,9,17 literature 165:18 165:19 litigating 134:9 litigation 161:11 169:16 173:14,18 173:22,24 174:3 174:7 185:16 187:14,16,18 206:17 little 32:17 38:15 56:11 78:2 96:11 101:16 137:17 170:5 175:14 live 29:12,13 34:9 44:10 47:10 183:15 livestock 186:3 location 166:4 log 62:14 logistical 207:13 loner 59:12 long 22:7 52:2 54:7,22 93:2 155:10 167:24 183:21 longer 72:24 111:12,15 143:9 215:24 226:5 look 6:9 8:2 11:13 11:15 19:20 21:21 27:8 33:17 49:19,21 50:3 54:25 59:7,17 77:9 78:15 81:20 81:24 86:4 99:2 99:11 102:1,7	103:16 104:12 105:12,18 108:13 118:13 119:10 122:9,11 127:6,9 130:24 132:1 138:4 140:16 141:19 142:8,19 143:8 151:9,12 152:9,10,22 179:11 184:16 185:2 193:9 205:21 217:14 looked 82:22 85:23 89:17 107:16 110:9,10 114:21 123:1 128:14 211:20 looking 3:25 8:21 11:10 13:1,15 14:23 48:2 81:8 85:22 88:2,16 89:7 98:2 100:13 115:17 124:17 141:2 146:2 153:13,18 170:5 187:3 188:2 190:22 203:2 207:3 looks 90:15 Lord 175:11 176:13 187:7 lose 155:2 lost 105:10 lot 6:6,8 13:14 25:15 29:19,25 30:3 31:21 32:9 32:12 33:20 37:1 45:20 54:3,4 93:7,13 99:8 100:8 142:11 150:1,22 152:25 153:1,2 159:17 183:22 lots 76:13,20,22 97:8 154:16 Louis 51:9 Louis's 51:16 low 93:24 94:1 101:6 111:21,22
--	---	---	--	---

200:15 203:20 215:20 216:8,21 lower 10:16 49:7 92:19 93:11,13 95:5,5,11 lowered 94:12 lowest 108:19 Luke 37:8 44:11 68:15,20,22 69:7 144:25	47:15 94:25 125:5 161:3 164:21 180:6 191:8,9,11 192:5 202:15 203:1,14 203:24 204:9 management 6:23 8:4 9:6 14:7,25 15:1,4 20:22 23:11,14 25:16 27:18 43:19 47:22 50:1 52:21 54:10,11 60:19 60:24 70:3,7,7 75:4 79:10 81:13 89:16 92:13 160:25 164:12 170:19 171:16 175:19,19 178:15 178:15 192:21 193:5 196:13 204:3,3 manager 2:8,9,9 2:14,19 3:17,20 3:23 5:11,14,17 5:18,19 6:1 13:18 14:5 15:12 15:17,25 16:19 16:22 17:7,11 20:2,5 21:13 23:17,21 27:2 30:10 36:13 41:25 44:4 45:1 47:2 65:16,25 68:8,11 71:25 75:1,18 76:12 77:5 78:22,22 79:4 84:16 122:20 123:3,4 142:25,25 143:4 146:6 147:23 154:6 manager's 172:18 managerial 17:19 managers 5:7 10:21 27:17 46:17 52:14 72:13 89:23 102:4,9 147:7	171:4 172:10 managing 21:16 21:17,17 23:13 42:2 43:9 89:1 94:16 122:4 137:12 145:11 mandatory 151:15 151:17,18 manual 110:7 130:1,2 maps 153:17 March 1:1,17,17 74:1,14 105:7 125:15 226:13 margin 92:25 Mark 16:16 72:3 market 154:16 Marner 37:9 Marsden 18:15 Marshall 37:8,19 38:11 massive 88:7 massively 93:8 maternity 90:13 matter 40:6 53:11 67:14 84:13 99:22 174:18 matters 80:20 134:2,4 172:11 174:11 218:11 MB 53:19 meal 24:3,5 25:6 63:5 meals 62:5,23 mean 4:6 5:9 9:22 11:4 13:22 22:4 30:21 32:3 43:5 48:18 58:12,12 59:3,3 69:5 71:24 76:13 88:19 91:22 100:21 107:4 108:22 116:11 117:2 124:15 130:9 135:1 138:19 147:7,20 164:9 169:11 171:23,25 172:23 174:1,6,15	177:13 178:1,25 181:15 184:16 186:24,24 187:19 190:17 191:9,20 192:16 193:2,25 195:4,19 197:12 197:24,25 199:6 199:21 203:8 205:16 208:5 210:1 211:23 218:20 220:10 meaning 99:14 means 3:13 26:23 38:4 74:3 105:24 106:2 125:2 199:10 205:10 meant 3:24 11:16 49:11 87:16 94:5 115:13 117:18 182:15,21 184:4 186:8 measure 78:9,10 measures 78:8 206:9 mechanism 104:18 181:3,16 medical 150:8 175:3 181:5 184:8,12 194:16 194:24 195:9 196:14,22 200:13 206:19 209:14 210:17 211:2 212:4 213:4 219:25 222:6 medico-legal 211:11 medium 215:20 Medway 7:11,12 7:20 meet 78:10 142:7 142:21 211:13 meeting 6:21 7:5,9 7:16,17,18 9:5 14:14,24 15:4 21:8,9,24 22:25 24:23 48:13 49:16,16 53:9 63:21 64:2,16	68:13 83:5 90:23 101:14 102:11,14 102:17 136:11 139:9,12 145:18 200:6 meetings 4:6 6:17 6:18,22,25 7:2,2 7:22 8:1,4,24,25 9:10,13,13,14,24 9:25 10:1,3 15:21 20:19 21:5 21:22 22:13 24:9 24:10 42:8,9 50:1 64:18 77:10 79:14,14 91:2,3,4 91:5,7,10,17,24 91:24 92:2 101:15 138:2 142:23 152:7 158:21 159:4 221:20 member 14:2 21:12 30:8,15,17 68:2 106:19 134:11,14 162:14 176:21 194:16 216:18,19 members 34:16,18 35:22,25 52:1 64:25 67:5,23,24 68:4 69:1,5 119:11 memorandum 130:16 memory 124:8,12 135:8 mental 56:23 57:6 58:5,18 59:4,18 59:20 60:3,11,15 60:18 135:11 149:15,19,23,25 150:10,15,15,15 151:8,11,25 160:14,15 161:21 164:13,18 165:21 166:1,5,5,9,16 167:17,18 168:4 168:9 180:8 190:12,13,14
--	--	--	--	--

191:12 201:11 205:21,23 206:10 208:20 mentality 10:25 103:21 mentally 114:5 134:13 152:10 161:1 166:23 178:14 209:13,16 210:6,7 mention 109:12 130:16 131:14 mentioned 24:7 25:9 27:10 37:15 54:8 81:4 92:11 129:12 130:3 131:19 132:21 134:22 142:14 145:17,24 169:4 173:1 177:23 185:5 195:16 199:19 222:19 224:21 mentions 82:13 130:8 messages 65:17 66:4 met 78:9,12 158:8 159:3 186:5,10 186:10 212:13 methods 201:7 Michelle 4:23 7:6 7:19 20:21,25 23:7,11 26:9,11 28:2 29:8 47:23 53:20 68:3 69:18 71:3 76:19 81:10 103:12 144:16 145:6 micro 44:7 microphone 1:11 1:14 middle 10:12 52:9 122:4 132:17 133:4 mind 56:7 109:25 167:24 mine 89:19 minimise 93:22	202:12 minimum 51:13 56:10 96:1,2,4,5 96:6,13 98:11 99:17 154:2 minister 181:19,24 ministers 193:8 minutes 21:2 53:9 63:13,15,16,20 73:10 87:17 109:20 missed 4:12 missing 15:9 16:3 71:21 mistake 66:19 87:2,3 mistreatment 34:11 170:8 221:7 misuse 208:19 209:12 MIT 3:8 Mitie 3:6,8 mitigation 78:12 79:16 Mmm 70:12 81:23 104:6 114:18 121:15 134:16 143:16 148:12 149:16 Mmm-hmm 211:15 mobility 108:16 moderate 215:20 216:22 moment 27:25 41:13 53:21 153:9,19 154:3 154:10 163:14 170:23 216:3 moments 110:12 monitor 152:6 monitored 142:1 monitoring 77:23 month 5:15 21:4,7 26:5 31:7 79:4 80:10 81:25 82:3 monthly 6:25 9:16 9:17 58:8,10,11	58:14 78:2,17 83:4 89:9 91:2,5 102:3 104:15 months 2:15 25:3 145:1 154:15 183:5,14 202:9 218:4 MOORE 73:16,19 73:20 117:20 118:3 153:20 155:14 226:24 morale 33:19 Morgan 37:7,18 morning 1:5,6 6:21 21:20 73:7 127:20 149:20 191:15,16 MOU 130:17,20 131:1,15 MOUs 130:25 move 3:4 12:12 48:8 81:13 108:19 116:22 126:1 130:13 143:14 158:4 191:3 192:18 196:7 moved 33:2 48:4,8 76:10 105:12 121:10 143:22 158:9 188:4 movement 117:17 moving 18:3 100:3 102:14 188:7 205:21 MSL 96:5,10 mucking 67:23 multi-disciplinary 153:1 multiple 135:10 mustn't 218:5 <hr/> N <hr/> N 226:16 name 1:7 73:21,22 105:20 106:17 155:24 158:6 159:8 178:3 222:18,19 names 38:6	narrow 185:6 Narrowing 185:11 Natasha 143:5 Nathan 10:8,10 11:3,8,20 12:10 13:6,14 36:7,21 37:2,8 38:13,14 38:15 64:23 65:12 Nathan's 36:4 national 225:2 nationalities 32:19 naturally 155:1,2 nature 42:2 68:25 89:17 102:21 165:4 173:15 180:20 186:22 near 15:15 near-London 222:11 necessarily 62:12 88:23 127:11 161:12 174:4 187:25 216:11 225:6 necessary 14:19 52:12 122:24 123:19,24,25 124:9,23 159:21 159:23 162:18 174:11 175:12,22 189:4 196:7 213:20 necessity 124:5 224:11 neck 87:14 108:11 108:14 112:13,15 need 2:20,21 7:7 19:16 21:21 38:19 53:13 59:5 63:7,12 64:18 66:7 81:19 82:8 98:3 104:12 111:7 129:7,14 133:22 136:19 152:13 176:4 201:2 203:13 204:10 210:8 225:12	needed 8:7 11:15 12:11 17:3 18:12 19:14 25:21,21 26:20 45:4 47:19 52:7 54:17 95:4 97:22 121:8 135:12 149:24 158:5 160:19 177:9 196:17 201:5 205:2 needs 3:25 6:6,10 10:22 12:20,20 33:18 51:11 64:20 116:20 125:9 137:6 177:22 183:22 194:2,20 negative 24:21 148:7 negatively 165:25 negotiation 10:14 negotiations 11:22 Neil 103:21 131:16 132:24,25 133:1 neither 136:4 net 56:2,3 57:1,25 59:2 61:12,23 netting 118:9,11 124:20 125:12,17 125:20 126:2,4,8 126:10 129:16 neutralised 109:6 never 13:20 21:4 22:19 31:18 40:24 44:3 46:20 47:2,3,6 56:7 65:10,11 66:22 66:23 84:21 85:21 86:4 114:23 115:15 146:17 202:16 new 53:18 71:18 89:11 90:20,21 93:9 94:6 142:10 150:25 151:3 153:15 158:5 176:3 214:22 216:8 Newland 67:16
--	--	--	--	--

68:5 143:2,3 NGOs 169:25 nine 41:14 60:4 82:2,7 no-one 97:20 112:7 nods 131:20 non-effective 94:22 normal 30:11 77:4 98:10 135:25 136:13 normally 47:11 75:19 79:5,7 92:4 119:8 128:25 noted 106:5 notes 67:17 138:15 144:15 notice 33:6 noticed 103:15 notification 33:10 notified 118:19,22 194:5,19 215:14 notify 122:23 November 18:2 145:3 156:13 number 10:15 30:25 37:5 76:21 80:2,2,15,17,18 80:20,21 86:2,3 90:16 91:23 92:19,21 93:20 94:6,14,15,17,18 95:3 98:22,24,25 99:17 101:19 107:5,14 109:24 109:25 117:5,6 130:4 133:24 141:22 142:4,6 152:4,15 154:2 156:18 159:6 168:3,7 173:3,3 179:19,20,24,24 180:18 181:7 182:12,19 186:1 186:14 197:21 201:22,24 213:21 217:20	numbers 1:20 94:12,17 95:11 97:23 98:2,3 163:10 181:21 182:1 200:15 219:17 numerous 29:21 101:13 104:3 126:3 nursing 57:17 O o'clock 118:20 119:18 127:20 226:9 Oakington 2:11 object 128:9,16 objective 47:1 179:1 objectives 47:3,18 47:20 observation 120:7 obviously 12:3,5 12:15 17:3 71:10 72:23 78:18,25 81:18 86:6 87:20 89:10 96:2,7,11 102:8 107:21 108:23 113:23 114:15 120:13 129:6 133:2 134:5 136:1 139:13 140:7 143:14,25 151:5 162:17 169:17 175:10 183:12 197:23 198:7 220:18 occasion 22:16,24 occasions 101:14 166:4 173:3 187:6 occur 145:10 215:10 occurred 82:24 138:24 178:23 occurs 224:15 October 18:2 67:18 74:21 105:8 200:1	off-the-peg 207:14 offenders 11:10 offenders' 11:9 offer 46:2,16 97:23 133:9 offered 72:18,19 158:18 offering 138:13 office 6:24 15:21 23:25 24:21,24 30:9,9,12,18,24 32:7,11 33:1,2,13 52:5 62:9 64:12 67:22 71:11 78:11,23 79:15 83:1,8 91:5,10,11 92:4,5 95:18,21 95:22 101:3,4,24 116:19 117:9 118:24 121:25 122:1,17 131:7 131:10,16 133:8 133:25 135:4,16 135:23 136:6 138:10,20 139:8 140:6 141:11 142:3,25 143:5 144:5 156:9,15 156:25 157:8,13 157:24 159:11 160:24 161:6 162:1,7,9,13 163:23,25 165:13 169:6 172:1 173:7,16 176:18 176:24 179:9 181:1 183:13 184:21 186:12,14 187:10,13,18,20 187:23 190:1,21 192:23 193:1 194:4,19,23 195:7,8,24 196:23 199:5,8 199:17 200:7,8,9 200:14 202:10 205:6,12 206:7 213:14,20,20 214:9,17,20	215:14 223:2 224:5,7 225:9,12 Office's 138:17 officer 3:7 97:3 99:11 100:11 156:19,19,20 officers 29:22 34:25 51:9 53:5 53:8 57:3 58:2 61:25 68:19 90:17 94:19 101:2 109:21 111:4 149:15 150:4,25 154:5 154:25 officers' 83:3 official 162:7 officials 162:9 Oh 9:25 61:13 146:12 159:22 171:25 172:16 195:22 okay 57:24 58:9 63:17 74:8 127:24 130:7 158:8 216:1 oncall 127:10 once 4:14,16 22:12 26:5 27:1 30:10 31:7 32:16 40:16 56:7 77:2 151:14 one-day 59:19 60:18 ones 35:9 153:24 179:17 222:12 ongoing 21:10 53:8 120:21 143:10 166:19 173:24 207:16 208:9 222:8 online 150:10 onward 33:8 onwards 130:16 139:22 Oozeerally 199:16 199:23 200:2,6 202:19 221:16 222:1 Oozeerally's	199:22 open 49:14 93:15 217:24 open-door 34:6 opened 2:16 31:23 49:11 63:8,11,12 68:5 93:15 opening 52:2 operate 218:1 operated 37:11 100:11 187:20 operating 90:7 177:9,12,19,20 197:16 204:21,21 219:7 225:25 operation 171:1 172:12 177:18 178:6 operational 77:7 157:3,14 166:21 169:6,12 175:24 176:22 177:14,15 177:21,21,22,23 178:8 185:15 193:1 operationally 187:22 operations 74:25 76:10 143:4 opinion 72:14 96:18 101:10 138:19 opinionated 98:23 opportunity 45:13 111:24 116:15 oppose 224:6 opposed 94:6 104:1 109:2 194:24 195:8 222:8 223:16 opposite 55:19 192:10 ops 91:5 142:25 options 107:1 order 20:2 27:9 45:3 83:21 102:1 152:13 171:17 172:25 176:12 189:1,4 204:5
--	--	--	---	---

205:2 206:25 215:10 216:3 224:13 Orders 175:22 organisation 159:8 organise 53:13 organogram 75:12 139:24 originally 217:2 ought 23:12 Ouseley 175:12 176:14 187:8 outcome 67:21 144:3,6 146:5 147:12,14 162:20 outcomes 152:16 170:11 outgoing 5:14 outset 14:7 193:23 194:6 195:2,6,12 196:1 197:4 223:6,20 224:2,9 224:13 outside 12:23 13:23 14:22 32:20 38:2 85:4 99:6 outsider 10:18 12:8,18 outward 57:2,5 58:1,5,25 59:4,14 59:18 outwith 116:8 overall 190:25 overcome 104:9 overly 42:16,18,21 117:2 oversaw 79:2 139:23 177:15 overseas 3:6 121:22 overseeing 90:12 170:21 oversight 76:9,14 76:15 77:6 84:1 142:17 169:21 172:11 178:5 overspeaking 93:25 98:1	104:24 120:12 overview 3:1 115:19 overworked 148:13 P pace 218:22 pack 146:8 package 149:21 page 10:8 11:6 17:20 20:9,23 26:10 35:3 36:9 37:4,17,18 41:23 41:24 44:2,8 45:15 46:25 47:25 48:4,12,14 53:10 55:19 57:8 57:11,12,15,20 63:7,20 66:7 67:20 68:16 72:7 75:12 77:25 78:19 79:24 80:5 80:9,14,25 88:13 92:12,15,15 98:15 101:8 105:19 106:1,16 106:18,23 107:24 108:11,15 118:6 118:15,22 120:7 122:12 123:16 139:22 141:14 179:14 180:13 pages 36:6 38:20 50:24 130:15 paid 4:3 15:14 25:24 26:7 155:5 paint 148:7 pair 133:19 Panel 34:18 Panorama 7:13 29:10 30:2 33:21 33:23 41:11,12 41:17 55:6 69:22 91:23 142:10,15 142:16 147:25 148:18 149:2 150:9 220:25 paperwork 8:5,23 9:6 69:17,24	paragraph 2:20 3:2 5:4 7:8,23 10:12 11:6 14:6 17:20 20:24 23:19 26:10 29:4 31:13 34:5 36:7 36:8,10 41:23 47:25 52:9,10 55:15,20 56:25 57:8,15,18,24 62:17 66:14 67:7 71:17 72:7 88:13 91:6,13 92:15 98:14 101:8 108:5 122:11,22 123:17 130:15 139:22 169:5 179:6 180:15,19 205:24 paragraphs 3:24 6:20 78:1 118:7 parameters 121:5 parliamentary 161:15 162:2 174:22 part 4:11,12 14:6 14:17,20 15:6 18:3 38:5 54:11 61:12 75:19,25 76:1,18,24 82:10 83:21,23 88:6 89:21 91:2,19 97:1 100:17 101:24 104:15 108:19,22 109:1 109:13,13 110:17 110:18,18 112:14 113:9,19 123:12 130:23 142:16 147:2 149:18,19 149:21 150:9 151:18 153:15 157:24 161:11 162:21 175:25 197:2 201:3,7 202:14 204:17,25 205:5,5,18 207:6 208:17 210:1 211:19 217:7	222:2 225:7,9 partially 145:4 participate 206:12 207:25 participating 70:5 particular 7:11 15:24 16:1 17:9 17:12 23:23 25:11,13,13 35:8 35:9,17 36:12 42:24 43:3 46:17 47:20 49:23 52:17 103:5 123:22 157:25 158:12 160:20 162:15 164:16 166:24 171:11 174:13 194:2 199:19 211:6 212:13 217:15 219:18 225:10,11 particularly 10:19 18:2 103:12 160:6 166:1,3 176:18 197:10 201:16,17 204:13 210:9 parties 78:23 130:24 partly 168:25 193:25 194:1 199:21 220:12 parts 83:24 pass 54:24 passed 2:22 31:24 path 45:2 184:21 pattern 50:10,13 50:15 patterns 50:6 54:19 70:17 Paul 1:3,9 131:11 131:24 132:24,25 133:1 138:20 226:18 pause 15:23 32:8 55:6 159:15 172:4 201:24 paused 145:1 pay 155:5	pen 192:24 penalties 80:3,4 penalty 78:13 80:10,14,16 87:1 89:14 95:9 pending 64:25 65:21 people 11:12,13,14 13:14,16,25 34:13,14,18 37:15,22,25 38:10 41:9 42:22 51:20 56:6 59:10 60:7,21 76:21,22 80:17 86:13 93:10 94:6,9,11 94:20 96:22,24 97:7,12,14,25 98:5,19,23,24 99:2,11,12 100:6 100:13,16,19,22 102:24,25 103:8 103:22,23 118:21 123:14 124:21 125:20 126:4,7 126:10 128:6,15 129:17 131:19 132:20 133:18 134:24 138:11,18 140:8 143:17 148:10,21,23 149:9,24 150:3 151:21 152:3,8 152:10,10 154:14 154:16,18,19,23 154:23 155:2 158:11 159:13 163:19 164:17 165:14 166:1,20 167:1 168:23 170:11 172:22 173:20 175:18 176:19 178:24 179:3 180:14,16 181:16,21 182:1 182:13,19,22 185:13 189:17,24 190:5,13 191:11 192:11 193:22
--	---	--	---	--

197:3,10 198:13 200:23 207:24 209:3,13,16 210:10 215:15 216:6,8 224:9,14 225:17 perception 26:16 perfect 21:6 149:11 153:5 perfectly 17:23 164:17 187:10 performance 21:17 23:11,13 23:14 78:8 90:23 90:25 91:20 performed 14:15 34:12 performing 88:14 period 5:7 6:2,3,3 8:9,14 9:19,24 14:12 16:1,14 27:11 29:7 31:10 33:1,18 38:16 49:23 50:20 51:2 72:8,9 75:14 76:3,23 78:18 84:20 85:5,10 89:6 91:1,16 97:20 101:10 112:25 128:1 141:18,21 143:8 143:11 157:5 159:25 182:25 197:17,22 198:1 permanent 75:6 permissible 120:2 perpetrator 186:21 perpetuated 191:23 persisted 53:2,3 person 40:10 45:16,23 62:19 66:15 77:13,14 82:7 89:24 90:1 100:13 111:7 116:20 119:3 123:20 124:16 126:23,24 127:2	127:16 128:11 129:1 135:12,18 137:24 141:7,7 143:20 151:7 174:9 176:25 177:7 186:8 194:8 195:20 224:16 person's 122:15 172:17 222:18 personal 13:15,22 personality 20:3 personally 127:22 164:4 persons 49:10 56:17 61:4 100:5 123:21 165:5 180:21 persons' 12:19 persuaded 118:11 pertains 122:8 Petherick 66:6 Petherick's 67:18 phase 105:3,3 phone 33:9 65:17 127:10,17 128:10 128:12 221:25 phoned 49:20 phrase 41:1 164:12 physical 191:12 201:13 208:21 physically 114:4 pick 58:22 59:14 59:15 60:14 71:12 77:3 picked 4:24 197:3 197:13 picture 148:7 piece 174:7 pieces 80:19 84:18 138:15 150:23 Pincus 131:22 place 8:1,20 9:2 15:13 25:13 30:4 32:1,16 53:19,22 53:23 64:16 68:13 71:18 72:4 79:19 83:4 89:11	96:11,12 103:14 110:11,12 116:16 116:17 117:11 128:21 130:25 137:5 139:13 141:25 142:9,14 142:15 146:7,19 148:19 149:3,8 154:20 165:3 170:7 190:22 202:5 203:9 205:4 206:10 207:2,21 216:10 217:11 220:19 224:24 place/enviromen... 32:2 placed 171:14 199:14 places 80:1 97:9 plan 95:14 97:13 98:2,4 102:16 104:14 142:16 planes 3:14 planned 109:17 113:10 117:10 121:21,24 122:5 129:19 130:12 planning 97:8 113:14 115:8 plans 89:1,2 97:4,6 101:15,19,21 102:22 104:3 153:10,16 played 19:4 158:18 please 1:7 3:11 10:7 20:23 36:6 36:9 48:12 50:23 50:24 67:21 80:25 105:19 106:18,23 118:14 123:16 133:13 150:14 155:25 179:19 180:14 187:1 plugged 206:18 208:5 plus 118:24 191:5	pm 73:12,15 117:20,22,25 118:2,20 155:14 155:14,17,19 226:11 point 35:13 41:24 42:10 45:16,23 51:7 88:12 95:8 98:8 111:14 121:14 128:17,20 146:12 164:5 167:4 176:8 187:21 points 78:8 80:10 80:10,13,14 89:14 90:24,25 police 65:1,21 policies 63:11 162:12,13 177:9 208:11 221:4 policy 62:4,8,18,22 62:25 95:11,12 125:19 129:15,16 129:18,23 156:24 157:1,2,7,9,13 158:2,10,13,14 158:14,15 161:1 163:1,2,5,6,8 164:11 166:12,17 166:18,20 167:5 167:7,21 168:13 168:19,21,24,25 169:6,8,11,15,17 169:18 170:2,6,9 170:12,21,23,25 171:1,2,3,12,13 171:17,20,21 173:2,4,13,19 174:11,20,23 175:2,5,20,21 176:3,10,18 177:8,11,16,17 177:19,20 178:6 178:22 179:1,8 181:13,23 182:5 182:7,11,23,25 183:1,11,15,19 183:20,24 184:9 184:18,19,22,23	185:5 188:3,3,9 190:14,16,17,17 190:22,25 191:14 192:15,24 193:2 193:2,3,11 194:22 196:10,20 196:24 199:5,15 200:19 201:6,10 201:14,19 204:19 208:14,15,17 209:3,5,20,24 210:2,11 211:19 211:20 214:22 217:4,10 218:10 218:22 219:4,22 220:19 221:5 222:2,7,9,15 polishing 25:21 poofter 29:25 poor 44:9 65:4 144:21 population 143:14 poses 116:14 position 4:19 14:8 14:21 15:13 66:23 177:21 positive 24:20 possibility 71:3 112:6 113:5 possible 113:7,17 122:23 127:2 197:13 224:23 possibly 110:24 159:15 160:18 162:18 184:4 post 72:9 79:8 142:10 150:9 158:19 170:14 217:14 post-traumatic 180:11 poster 53:18 potential 120:21 121:23 142:6 165:25 210:19 218:22 potentially 69:21 86:18 87:2 114:3 114:4 117:12,14
--	---	--	--	--

120:14,14,17 139:16 144:7,8 193:19 197:8 204:14 207:24 211:4 215:15 pound 25:17,18 Povey-Meier 43:22 44:7 powerful 38:25 powers 120:3 123:24 PPE 109:23 113:16 129:12,14 129:19 130:6,12 practicalities 169:13 practice 121:18 129:15,20 141:9 164:20 184:4 191:7 practices 177:15 178:9 198:16 214:4 practitioner 213:18 practitioners 213:5 222:6 praise 42:5,14 43:6,7 pre 170:12,14,23 pre-action 175:8 prearranged 136:8 prebooked 136:8,9 preceded 171:2 precludes 216:11 predecessor 2:2 predominantly 219:25 prefer 224:14 preferable 203:5 pregnant 179:25 189:14 prepare 154:23 preparing 78:24 79:1 presence 31:4 95:21 present 7:15 24:11	29:9 64:2 81:17 95:23 106:19 109:21 113:13 116:14 128:7 199:23 presentation 134:15 presented 198:18 press 207:19 pressure 54:3 95:24 108:20 207:20 pressures 184:3 presumably 60:19 165:9 177:8 204:5 presume 172:2 presumed 180:11 189:18 presumptive 179:25 180:1 pretty 13:18 20:6 50:6,7 129:22 197:20 prevent 116:2 preventing 106:18 134:3 prevention 149:22 previous 12:3 143:8 154:20 169:16 176:7 182:23 190:12 212:4 previously 71:11 118:10 156:9 178:11 185:6 primarily 158:15 163:6,10 179:6 primary 179:1 210:1 principal 157:12 principle 130:5 188:24 189:5 190:5 211:22 225:2 principles 189:2 prior 1:23 3:17 33:10 92:18 156:14 157:18	158:13 159:13 161:15,23 195:17 197:5 223:9,13 224:1,12 225:15 prioritise 151:4 prioritised 10:22 12:19 13:6 priority 138:10 Prison 149:21 prisons 31:22 181:8 private 136:15,18 137:4 privately 30:18 proactive 172:7,15 172:20,24 probably 63:13 79:3 90:14,17 100:25 103:7 113:20 222:16 problem 12:1,10 19:17 20:14 23:4 23:5,21 42:16 46:18 53:2 88:9 208:20 226:6 problems 19:11,13 27:25 32:9 57:4 58:3 59:5 61:3 61:12 69:25 71:6 159:12 166:5 procedure 82:16 85:7 125:16,17 147:5 procedures 82:18 86:19 88:1 process 2:22 21:19 91:25 93:2 109:13 115:23 117:4 140:3,4,12 146:25 147:6 161:22 163:17 170:6,10 173:25 174:12,22,24 175:17 176:17,20 177:3,6,6,10 178:16 183:21 196:19 200:25 202:9 207:12 processes 81:22	148:18 149:3,4 177:15 224:23 produce 162:12 219:14 produced 151:1 211:25 212:3 220:8 production 206:25 professional 150:8 213:22 214:24 220:1 professionals 150:7 210:23 professions 154:19 154:20 Professor 165:18 189:25 profile 137:18 153:19 programme 7:13 23:14 28:8 33:21 41:11,17 46:23 70:3 150:19 151:1 progress 101:25 104:14 progressed 2:7 projects 14:23 prolonged 109:20 111:15 promised 181:20 181:22 promote 209:2 promoted 44:15 74:18 promoting 211:5 proper 150:7 properly 60:25 64:15 152:12 226:1 property 140:17 186:3 proposal 215:9,22 215:23,24 proposals 215:1 220:11 proposed 207:10 210:14,16 215:18 prospect 189:6	protect 163:18 protected 37:9,14 38:4,9 65:6 124:6 protecting 102:24 192:13 protection 61:5 170:2 184:1 211:5 protections 185:12 protective 181:23 182:4 protocol 175:8 provide 6:10 80:4 95:6 97:6 99:3 133:15 166:18 167:5 223:13 provided 1:15 64:3,4,8 80:21 81:4 82:1 84:8 94:20,22 95:4 105:5 134:14 139:14 141:14 178:8 191:16 provider 150:20 providers 138:14 provides 190:7 providing 81:5 97:4 134:9 138:14 provision 159:25 195:1 psychiatric 164:20 PTSD 165:14 189:14 public 136:14 publicly 181:20 publish 193:4 207:8 published 181:19 183:14 208:2 pull 10:7 24:4 25:4 25:7 30:7 42:13 42:15 43:4 pulled 22:19,20,23 25:14,19 42:12 48:22 pulling 24:8 39:5 punch 17:21 29:23
---	--	---	--	--

punishment 166:8 186:9 pure 177:19 purely 62:12 Purnell 36:1,2,3 37:7,18 38:11 purpose 166:18 167:5 173:4 177:11 185:18 190:17 purposes 90:10 123:4,6,22 125:2 156:3 163:1 189:3 190:18 pursue 187:10 push 102:8 pushing 60:6 put 18:23 19:19,22 27:6 28:8 39:12 42:9,10 54:3 66:23 71:18 79:12,19 109:14 110:20 115:17,22 121:25 129:17 137:15 158:5 187:19,20 190:22 203:9 220:19 224:4 putting 3:14 42:19 138:13 224:17	171:19 questioning 18:15 questions 28:1 58:15,17 73:5,5,6 90:3 100:10 153:20 154:1 155:8 211:9 221:9,10,11 222:23 227:1,7 quick 109:9 111:2 quickly 78:19 100:10 110:11 159:14,19 225:3 quite 25:9,19 42:1 42:3,13 76:3 81:9,11,12 82:10 82:17 93:2 97:14 100:23 103:13,16 105:13 110:11,24 112:25 118:7 126:9 128:9 142:19 145:23 150:16 175:6 183:19,21 187:19 192:4,7 207:12 212:17 quote 15:9,14 quoted 123:17	193:18 199:16 203:18 206:18 213:10,17 223:2 raising 7:19 23:23 34:15 52:20 68:19 103:14,19 133:25 134:25 135:2,6 137:18 151:24 152:3 196:22 216:11 Ramon 47:23 ran 10:24 201:1 range 159:4 192:25 210:23 rape 179:23 rare 85:1,5 rarely 63:8 102:5 rate 94:22 rationale 115:14 115:15 116:2,10 116:11,13 119:13 re-introducing 202:14 re-traumatising 165:15 reach 95:8 reached 111:13 react 110:22 reaction 145:20 147:25 read 36:10 63:22 63:22 130:4 183:18 191:15 reading 67:12 201:21 readjusted 39:13 ready 207:8,18 real 152:7 213:16 realise 87:12 154:24 realised 117:20 realistic 189:6 reality 41:17 really 6:16 56:20 98:22 99:22 119:12 137:13,22 138:1,1 142:1 152:3 153:13,19 202:16 212:19	220:12,15,15 223:22 reason 65:24,25 67:25 69:3 78:12 79:3 96:1 105:25 106:1,17 109:12 116:22,25 120:2 137:20 185:14 186:9 195:24 221:8 reasonable 137:7 187:10 189:7 reasoning 208:22 reasons 31:1 44:2 49:22 118:23 152:4 210:5 212:1 225:10 recall 7:16,19 10:5 12:12 13:10 40:4 40:14,18 52:16 52:18 81:10,11 84:10 86:21 91:16,19 92:2,16 93:20 95:22 104:14 105:16,17 106:9 123:7 126:9,10 131:1 135:21 138:1 139:15 145:20,24 146:2,3,13 150:20 160:21 161:5 195:3 197:1 217:7,7 221:19,25 recalled 221:16 recalls 139:9 receive 24:23 received 44:12 48:2 140:5 176:21 183:13 199:8,12 213:6 213:21 reception 140:17 recess 183:17 recognise 60:9,10 132:8,9 165:14 recognises 107:17 recognising 61:24 recollection 85:1	199:23 recommend 180:5 180:10 181:1 184:18 recommendation 130:4 165:10 180:1,4,9,14,25 185:8 recommendations 101:22,23 162:22 163:10 176:16,25 177:1,5 179:4,7,7 179:11,16 181:12 181:19,20,25 184:10,15,17,24 189:8 192:15 recommended 165:1 184:18 189:9 214:8 218:25 record 87:19 118:22 143:12 recorded 81:19 85:11 116:7 recording 113:12 records 82:2 127:6 127:8 recruit 92:20 93:18 95:17 96:22,24,25 97:22 98:10 154:13 recruited 96:16 recruiting 55:3 recruitment 55:9 98:9 154:17 155:7 red 107:19 redaction 108:17 redesigning 164:6 reduce 127:2 181:21 182:1 185:13 reduced 50:8 reducing 182:12 211:4 redundant 72:22 72:25 refer 2:20 9:22
Q	R			
qualification 11:15 qualified 11:12 150:24 quality 90:2 100:4 141:1,4 210:17 211:12 212:9,20 quantify 150:2 quarterly 9:16 question 10:6 37:21 51:2,5 58:5,20 85:17 99:18 129:10,15 132:13 153:21 172:14 202:22 212:2 221:13 222:6 223:22 questioned 85:21	racism 220:24 RAF 1:24 rail 109:6,11 raise 24:19 35:2 45:22 46:9 69:2 102:10,13 104:25 153:18 212:21 raised 1:12 7:10 7:14 21:6,7 31:9 49:16 62:10 63:10 79:16 86:16,17,25 101:13,18 102:6 102:18 103:10,13 104:2 132:23 135:1,7,8,15,16 138:3 173:23 184:8,14,24 185:3,14 186:19 188:2 191:3			

73:24 131:21 135:24 150:6 194:17,18 204:3 reference 1:20 74:2 134:10 147:9 156:3 223:1,11 referenced 134:12 references 132:22 138:5,6 referred 9:23 43:23 71:7 75:20 96:5 101:20 190:13,14 191:10 223:1 referring 27:5 45:19 61:15 69:25 70:1,3 100:25 refined 142:19 reflect 165:4 174:10 180:20 184:10,15,17 reflecting 184:23 reflection 110:18 112:20 113:20 reflects 225:6 reform 210:16 reforms 210:13,20 211:4 refresher 8:7 Refugee 159:9 refusal 62:3,12,14 62:18 63:9 208:12,18 refuse 79:15 116:20 132:11 refused 132:7 refusing 43:15 62:5 117:13 regarded 188:10 212:7 regarding 59:20 65:1 regardless 36:19 36:24 regards 33:3 40:1 regime 56:18 99:6 120:22 121:2	124:1,2,4 152:5 regimes 14:5 78:24 registered 149:12 regressive 211:4 regular 18:17,18 24:3,16 29:4 50:4 regularly 21:22,23 41:2 47:14 48:24 reinforced 72:13 relate 212:19 219:13 related 140:16 159:12 166:12 167:20 173:22 179:21 214:13 220:6 222:7 relates 118:8 relating 85:6 89:19 192:4 206:12 relation 20:22 35:4 36:4 48:11 68:20,21 118:14 124:19 126:22 142:13 158:10 162:13,13 164:13 165:8,19 167:14 172:22 173:19 174:16 176:15,19 178:10,14 191:23 194:5 196:9 197:15 202:1,11 202:21 206:11 209:11 210:13 211:3 218:8 221:13 223:10,25 224:7,8 relationship 69:4 69:8 130:13 131:9,17 132:18 relationships 36:16 68:25 69:9 relatively 111:21 111:22 203:19 release 188:21 202:22 203:4,6 203:10	released 30:25 134:17 143:24 relevance 108:21 114:2 169:24 relevant 6:2,3 8:9 9:19,24 14:12 16:1,14 27:11 29:6 31:10 33:18 50:20 72:9 75:14 76:3,23 78:18 79:12 83:7 84:20 85:5,9 89:6 91:1 91:16 101:10 140:7,13 141:7 141:14 142:18 157:5 158:11 166:16 172:5,8 172:21 174:3,8 197:17,22 208:14 rely 83:18 152:19 152:21 relying 195:25 remain 161:2 217:9 remained 76:5 217:22 remaining 207:22 remains 208:4 remedial 202:12 remember 2:23 4:21 8:8 9:12,15 9:18 10:9 13:23 23:22 33:5 34:12 39:4,16,17,19,23 50:5,21 52:20 55:3,8,13 62:7 76:3 101:18 114:9,16 120:11 125:22,24 126:6 126:14 131:6 145:17,19,23 148:19 150:16 159:2,7 160:22 161:17 162:4 164:1,24 168:11 174:6 178:3,5 179:13 182:16 183:10 184:10,12 184:14 196:21	198:7 199:20 200:10 201:8 204:20 206:24 212:5 213:3 215:4,6 220:3 221:23 222:4,18 remembering 106:9 remind 215:18 reminded 191:15 199:21 reminding 172:23 remit 76:18 89:14 97:1 130:24 149:18 153:9 removable 109:2 removal 33:7 113:3 118:23 119:5 120:1 122:15 134:3 157:4 175:24 176:1 189:4,6 198:17 206:13 208:1 removals 33:11 121:22 225:2 remove 3:15 109:4 110:10 111:10,24 115:8 116:3,21 138:10,17 139:6 removed 87:16 112:13 128:10 144:1 180:6 191:13,21 removing 109:5 138:23 139:16 214:22 215:2 renewal 92:18 93:4,5 repeated 137:21 repeating 167:25 replaced 180:2 188:5 201:2 replacing 56:1,4 replied 14:17 report 39:10 52:20 66:18,19,19,21 78:17 79:3,13,13 79:24 82:1,1,25	84:12,14 85:13 86:3 89:23 105:6 107:5,13 108:24 109:15,18 115:1 115:19 147:13,13 159:6 162:17 176:20,21 183:13 193:14 194:18 196:16 198:8,13 198:14,21,22,25 199:2,10,12 200:16,23 201:3 203:12 204:11 205:15,18,20 210:24 211:12,25 212:3,7,9,20,23 213:1,6,7,10,13 214:7 217:5 218:14 219:9 reported 7:25 8:3 8:6 52:13,14,14 52:19,23 62:9,9 78:10 79:17 80:1 82:8,25 83:8 84:14 85:12,16 86:9 88:10 104:15 126:20 144:23 183:12 204:23 214:7 217:19 219:1 reporter 212:21 reporting 72:13 79:22 81:15 88:24 119:9 181:16 199:10 200:12 201:2 205:2,11 214:8 214:13 218:14 219:9 reports 28:10 38:7 67:12 78:2,25 83:25 84:18,21 85:14,16 86:13 89:9,15 90:9,22 128:20,24 131:25 163:24 172:25 197:18,19,21 198:1,2,4 199:6 200:22,23 201:24
---	--	--	---	---

211:24 213:4,21 214:5 217:14,17 217:21,22,23 219:2 220:15 reports' 211:12 represent 22:2 166:7 representation 22:8 representative 37:11 represented 15:20 representing 15:10,11 represents 187:25 188:7 requesting 132:2 135:10 160:3 require 106:22 required 21:24 26:17 62:15 72:24 81:1 82:5 161:6 175:20 176:6 183:16 188:14 193:12 200:20 218:25 219:14 220:7,7 requirement 51:14 85:20 94:14 177:16,17 183:4 193:3 203:22 requirements 84:23 92:22 116:8 requires 62:4 82:14 86:23 87:1 198:7,8 requiring 190:4 res 15:10,11,13 residence 15:15,20 16:16 18:4 67:11 71:19,24 resident 110:5 119:11 121:22 133:20 137:12,14 142:5 144:5 147:1 148:24 149:9 150:5 residential 2:9,14	2:19 3:20,22 5:11,14,16,18 6:1 14:5 15:12 22:8 36:13,14 41:25 42:2 48:13,15 65:5 140:15 residents 93:12 99:2,8 100:9,19 120:22 121:3 133:16 134:2 152:16 153:12 resigning 94:11 resilience 103:1,2 resistance 102:21 104:8 resolution 111:2 resolving 18:12 resonate 53:19 54:7 resort 116:9 120:20 121:1 resource 97:13 resource-wise 97:9 resourced 99:7 resources 63:25 64:3,4 respect 13:17 20:7 32:13,20 36:17 37:1,2 54:1,5,21 56:1 58:24 158:15 168:22 179:2 180:15 187:16 191:11 192:15 197:22 respected 20:17 respects 190:24 respond 175:11 183:17 responded 140:7 responding 160:2 response 46:15,16 102:6 161:10 162:1 176:24 177:4 179:9 206:2 responses 140:25 141:10 responsibilities 52:4 75:23	162:11,11 responsibility 4:3 42:1 77:8 122:21 157:12 163:6 171:1 172:10,11 173:17,23 174:10 174:14 176:23 177:1,2 responsible 19:7 26:6 36:15 44:4 157:8 158:15 163:9 169:5 173:21 178:5 179:5 181:11 192:24 202:3 205:22 responsive 219:4 rest 20:8,16 52:4,6 56:11 58:9 76:6 110:15 222:14 restrain 111:7,9 restrained 112:15 restraint 110:11 110:12 112:6,11 130:2 restricted 13:7 result 79:14 82:16 85:2 89:2 104:2 119:22 165:1 182:14 193:14 194:13 205:14 213:1 216:6 resulted 15:10 86:19 87:1 resulting 81:2,6,18 82:6,13 84:7,22 86:17 188:21 results 78:12 83:6 141:4 152:15 215:2,12 retained 92:23 165:2 192:21 retaining 220:13 retention 53:13 155:7 retire 156:12 retired 156:10,21 208:7,8 214:15 retirement 156:14	157:19 retrospective 116:24 return 155:14 returned 50:11,19 revert 176:7 reverted 60:23 review 7:22 8:4,22 8:23,25 9:3,6 39:21 47:17,20 58:8,10,11,15 104:15,18 142:8 157:22 159:16,21 160:4,17 161:8,9 161:9,10,14,23 162:3,7,8,10,12 162:12,20,23 165:18,19,19,22 167:13 168:7,12 170:24 176:11 179:4,10 181:18 185:8 194:21 209:12 217:2,12 218:8 219:1 reviewed 7:24 8:18 175:3 215:16 reviewing 171:16 177:8 reviews 8:15,20 9:2 77:10 172:25 194:9 RFA 119:1,3 right 6:2,3 7:3 16:2,15 18:9 22:5,5 29:18 36:10,11 39:13 39:21 41:23 50:5 57:13,15,23 62:6 62:20 63:9 79:20 82:12,17 91:8 94:3,6 98:24 105:22 115:17 119:10 135:5 144:11 145:22 146:14 147:19 150:2,17 154:14 156:10,16,24 157:5,10,16,22	158:22 163:3,7 180:24 182:8 183:17 185:9 188:15 193:24 195:4 204:5 206:14 208:12 210:25 215:8,10 218:5 rightly 13:23 142:1 ring 37:8 38:13,14 38:15 129:2 ripped 48:20 risk 109:13,18 111:16,20,22,25 112:16,17,18,19 112:24 116:14 120:15,21 125:14 126:19 127:2 130:9,11 151:7 153:13,17 163:2 163:5 164:11 166:17,25 168:25 170:12,23,25 171:2,3 175:1 176:9 178:6,22 179:8 181:13 182:7,10,24 183:11,15,19,24 184:18,23 185:5 186:19 188:3,6 188:12,25 190:6 190:14,16 191:5 191:14 192:20 193:2,5,10,23 194:22 196:9,20 196:24 199:15 201:6,10,19 203:23 204:3,19 208:15,15,17 209:3,5,23 210:2 210:11,13,18,20 213:8,9 214:23 215:9,11,19,20 216:2,4 217:4,25 218:10,15,21 219:4,11 221:5 risks 109:19 111:16 112:4,9
--	--	--	---	--

153:12 202:12 risky 137:13 152:8 role 2:21 3:11,22 4:15 5:5,6,10 6:1 6:5,11 14:4,16 17:19 33:16 67:8 69:20 74:12 75:1 75:1,2,6,8,25 76:1,12,24 77:4,5 77:6,15,17,22,25 78:24,25 79:9,18 81:13 88:14 89:5 95:25 101:24 121:8,10 123:10 123:13 131:15,18 133:25 139:21 140:2 151:23 157:18 158:1,7 158:12,18 159:13 161:14 177:24 208:10 223:19 roles 74:23 155:6 156:18,23 157:3 rolling 153:16 room 19:11 49:14 56:13 59:11,12 87:11,13 108:8 108:13 116:23 117:13 124:21 132:2 136:4,8,9 136:12,14,15,17 137:5,14 rooms 6:15,16 18:13,21 56:10 80:21 roster 77:1 route 192:11 224:13 routinely 196:15 routing 191:25 rule 80:18,18 118:12,19 119:7 119:16 120:3,7 120:16,17,25 121:6,11,16,20 121:25 122:1,6,9 122:13 123:5,14 123:17,18 124:8 124:17 125:2,18	125:21 126:2,5,7 126:11 129:17 160:13 161:21 163:17,24 164:6 178:16 181:2,7 181:12 193:13,14 193:16,17,18,19 193:25 194:16,18 194:21 195:1,1 195:25 196:1,9 196:11,15,16,18 197:3,4,15,18,19 197:25 198:4,7 198:13,14,21,22 198:25 199:2,10 199:11,12,17 200:20,22,23,24 200:24 201:1,16 201:24 202:2,3,5 202:8,9,11 203:12,17,17,22 203:24 204:11,17 204:22 205:6,15 205:17,18,19,20 206:13 209:19,20 210:24 217:17,20 217:22,23 218:1 221:6,22 223:5,5 223:19,19 224:2 224:2 225:16,20 ruled 160:23 161:6 rules 122:8 193:9 193:11,21 195:5 195:12 196:11 197:16 201:18 223:5 ruling 176:2 206:3 rulings 160:5 175:18 run 52:7 77:8 92:16 93:22 94:23 96:3,11 97:23,24 100:6 run-up 95:12 running 32:16 43:17 51:25 77:7 95:11 96:8,13 97:13 Ryan 43:21 45:12	45:19 46:25 47:21 <hr/> S S 118:17 119:3 S/H 106:2 safe 111:2 safeguard 135:17 194:4 195:11 218:18 225:16 safeguarding 18:1 77:18 137:16 153:19 172:10 203:10 safeguards 161:20 178:24 181:22 182:4 192:13 193:12 197:2 210:20 217:11 224:2 safely 96:4 Safer 81:8 82:19 83:4,16,19,23 84:15 86:12 safety 75:25 76:18 99:20 100:1,3 120:23 123:20,24 124:3,5,10,23 Santi 97:2,3,15 Sara 4:24 Sarah 67:16 68:5 142:24 143:2,3 sat 76:4 satellite 76:16 satisfactorily 161:2 164:21 180:6 191:7,9,11 192:5 202:15 203:1,14 satisfactory 160:25 164:12 192:21 204:2 satisfied 205:4 Saunders 7:14 41:22 53:12,17 54:24 88:16 92:16 95:13 101:12 104:8,11 131:15 133:8 savings 92:25	93:14 saw 11:3 29:14,15 29:17 33:20,23 33:24,25 34:4 41:13,16 66:14 108:13 115:11 119:18 128:15 139:24 148:16 171:4,5 172:3 214:4 saying 24:24 35:20 35:21 39:13 40:11,14,20 41:16,18 59:4,8 108:10 114:10 137:2 138:3 145:13 205:7 213:7 214:2 says 7:8,8,14 13:12 15:10 17:19 21:16 26:13 38:20 45:22 47:9 47:25 48:3,4,15 53:1 55:19,20 57:24 64:24 66:6 66:7 69:18 87:2 106:15 107:25 109:15 110:2 111:13 118:24 119:25 122:13 139:14 141:17 145:7,7 203:17 203:18 scared 35:2 schedule 78:4,7 81:20 82:18 84:23 scheme 27:16,18 146:20,21 scope 55:21 143:9 182:15 194:20 201:14 scraping 96:17 screen 7:8 10:8 48:12 73:24 75:10 78:17 81:25 92:14 98:13 114:22 118:13 122:7	179:15 180:25 223:25 224:6,12 screening 161:19 194:25 195:9,10 195:20 197:5 223:7,9,10,13,19 223:24 224:25 225:11,15 scroll 37:17 scrub 25:16,18 scrubdown 26:5 scrutinised 104:20 scrutiny 142:11 search 118:15 126:12,17,18 127:1 128:13,18 128:21 searches 63:24 64:1,3,6,7,9,14 64:15 searching 18:13 63:23 64:11 second 1:17 2:19 6:25 9:5 11:2,6 15:8 16:17 18:5 20:24 21:1 23:19 47:8 63:22 66:13 68:24 69:15 71:17 72:8 108:3 136:24,24 203:5 217:12 218:8 seconded 74:25 90:13 157:24 162:7,9 secondly 66:3 168:7 secondment 157:22 seconds 22:17 Secretary 122:14 122:22,23 123:23 160:2 193:4 223:15 section 123:1 152:11,12 180:7 202:13,21 secure 109:10 110:9 111:24 124:23
--	---	--	---	--

secured 75:6 110:6 110:8 securing 111:2 security 6:25 21:8 21:9,13,22,24 22:12,25 44:23 66:25,25 67:2,10 76:4 84:17 123:20,24 124:5 124:10,12,23 security-led 67:3 see 1:10 8:7 9:7 13:13,25 17:15 24:2,11 29:5 30:19,20,23 32:14 41:3,5,14 46:17 47:17,18 47:19 57:5,16,18 57:21 77:13 78:19,19,20 80:9 80:10 85:14 90:10 94:10 95:8 98:3 102:25 105:20 114:12,12 118:15,19,22 119:13 120:6 122:19 133:17 135:1,12 136:22 140:19 146:16,18 147:24 148:8,11 167:4 171:25 172:16 176:15 179:22,24 180:4 181:9 183:18 184:22 191:23 192:7 195:22 209:8 213:19 216:10 224:14,15 seeing 11:17 13:1 120:13 186:14 213:3 seek 122:5 seeking 126:21 172:24 seen 13:14,16 17:17 22:19 30:1 52:22 63:3 70:5 87:5 90:22 105:4 105:9 106:15	118:9 119:6 137:2 144:15 148:13,22 149:1 170:17 171:18 197:22,23 199:4 199:22 220:25 221:1 segregated 166:24 167:2 segregation 166:3 166:8,14,20 167:3,20 209:11 209:13,15,23 210:4,9 selection 2:22 self 215:3,13 self-declaration 188:18,19 215:25 216:16,17 self-declared 216:4 self-harm 59:3,8 81:2,6,18 82:3,8 82:20,21,24 83:5 83:9,10,11 84:7 84:15,22 85:5,9 85:10,19 86:5,16 87:21 106:2,18 149:22 201:4,4,9 201:12 204:16 208:16 217:23 self-harming 59:9 self-reporting 86:24 semi-formal 174:2 send 22:1 84:5 102:3 141:4 144:4 senior 6:23 8:4 14:7,25,25 15:4 15:12 21:13 27:2 30:10 46:10 50:1 52:21 54:10,11 60:19,24,24 68:8 70:7 75:4 77:13 77:14 81:13 131:8 146:6 147:7,22 156:19 172:3,10	seniors 72:23 sense 21:6 37:12 135:25 170:4 177:20 178:25 sent 9:5 79:22 132:10 141:11 150:23 sentence 21:1 57:24 sentenced 28:6 separate 198:25 199:5 separating 200:11 September 2:5 31:17 72:10 74:21 176:10 183:15 SER000453 74:3 92:15 SER000455 55:19 Serco 142:10,20 155:3 serious 86:7 164:17 166:5,9 166:16 167:16 168:4 180:8 190:13 201:13 208:21 213:9 servant 156:20,21 served 175:7 servery 62:5,23 service 72:12,14 133:16 149:21 158:4 175:5 176:1 207:14 services 75:7,8,16 75:18 76:12,20 77:5 80:4 93:12 99:4,5 175:22,25 206:25 222:12 session 47:1 137:4 149:20 150:24 199:24 200:2 sessions 44:19 133:18 set 17:25 26:18 45:4 82:18 99:14 107:24 117:3 130:1 131:16	132:17,20 143:8 150:19 188:9 sets 122:12 182:25 setting 36:15 47:1 145:18 settle 32:17 settled 31:20,25 32:1,21 134:19 seven 39:19 77:2 93:15 98:21 213:6 severe 112:2 167:18 168:9 186:6 severity 160:13 185:18 sexual 179:23 shadow 5:7 shadowed 5:14 share 76:9 101:5,7 142:2,3 214:9 shared 82:25 104:16 119:15 135:19 137:3,9 137:19 140:7 141:10 142:18 214:18 sharing 137:12 141:9 Shaw 157:22 158:8 158:21,25 159:16 159:19,21 160:3 160:17 161:9,10 161:14,23 162:3 162:7,8,12,15,20 163:16 164:6,12 165:19,21 166:3 167:13 170:24 179:4,10 181:18 183:12 184:17 185:8 192:10 209:12 217:2,12 217:12 218:8,24 Shaw's 159:6 163:9 184:10,15 184:17,24 189:8 190:10 192:15 shift 2:8,9 28:21 50:5,6,10,13,15	54:19 70:17 shocked 138:25 shop 62:20 63:4 short 5:7 48:21 73:14 118:1 132:1 155:18 shortage 49:22 shortages 54:2 154:9 shouted 101:16 102:19 show 37:1 57:2 58:1,21 73:24 92:14 93:24 showed 38:24 showers 25:15,16 25:18,23 26:5 showing 94:1 shown 78:16 148:6 148:17 shows 110:3 sic 20:23 sick 49:20 sickness 44:21 49:1 50:8 54:20 70:16 94:21 side 69:16 75:15 153:2 sidelined 10:25 13:12 sign 9:3 59:12 78:25 signatures 118:17 signed 74:1 78:20 123:14 131:1 193:7 significant 55:9 124:2,3 126:23 significantly 10:16 142:19 signing 102:1 signs 57:2,5 58:1,5 59:4,10,14,18 60:9,11 61:24 151:12 Simcock 155:20 155:23,24 196:7 221:9,12,15 222:24,25 223:3
---	---	---	---	---

223:4 226:2,9 227:5,9 similar 7:10 103:21 135:2 136:5 138:6 similarly 89:13 203:17 Simon 37:8 38:12 simple 35:24 49:12 66:24 simply 36:17 167:22 205:10 212:12 215:13 216:16 Singh 189:5 single 156:8 sit 118:11 site 77:14 82:5 127:25 sites 12:6 77:19 sitting 76:19,20 124:21 148:19 situation 25:8 46:3 46:7 109:6 110:21 112:21 113:6,23 114:1 119:8 126:5 127:7 164:21 177:22 186:4,15 217:1 six 2:15 39:18 70:17 97:12,14 98:21 158:3 six-monthly 47:16 skill 17:25 26:18 skills 26:14,21,23 28:2,4,10 Skitt 4:24 7:15 15:24 16:8 22:23 23:16,20,23 24:16 29:8 46:13 48:8 54:24 55:18 55:24 131:24 132:24,25 133:1 139:11 Skitt's 20:22 skull 186:7 SLAs 130:25 slightly 49:7 50:8	89:21 114:1 121:9 221:14 226:4 slip 57:1,25 slipped 59:2 61:11 61:22 small 60:21 76:21 136:17 SMT 14:14,17,20 15:10 16:21 20:8 20:17,18 21:2 34:16,17,19 35:22 48:13 49:16 53:9 63:20 75:19 81:16 91:4 100:21 101:1,10 101:16 102:14,17 142:3 snapshot 143:11 social 133:16,20 136:16,16 220:1 socialise 36:2 38:2 socialising 36:5 69:7 soft 11:1 12:24 13:12,13,21 soften 13:2 solely 96:21 168:14 somebody 16:10 44:15 47:12 59:7 59:15 60:11 81:16 100:7 147:18 someone's 135:11 205:13 somewhat 193:10 soon 122:23 sophistication 66:9 sorry 9:22 16:7 17:7 20:1 24:8 37:17 41:20 57:7 57:13,23 59:19 61:13 66:19 78:22 86:2 97:4 122:12 133:12 138:2 141:7 145:12 167:24	171:23 172:13 174:8 185:17 186:24 192:17 196:3 203:8 205:17 212:17,17 220:2 223:22 sort 17:5 18:23 49:12 75:3 76:4 76:7,10,15,19 77:7,9,11 81:12 83:2 89:17 90:9 93:19 103:3,21 106:11 107:15 110:19 111:1 114:10 121:7,8 121:11 123:15 127:3,9 128:14 130:10 132:16 133:17,19 136:5 136:19 137:15 138:12 140:4 141:8 142:8,18 147:3,4 149:23 150:24 151:4 152:5,6,7 154:18 185:21 sorted 207:9 sorts 101:5 104:19 207:13 sought 121:24 132:10 185:6 187:23 198:13 200:9 sources 90:5 speak 12:11 17:5 30:17 31:5 32:13 39:8 43:11 46:20 57:3 58:2 59:6 61:4,13 69:2 138:19 169:3 172:4 208:6 214:20 speaking 26:11 34:8 71:22 81:1 spec 93:16 94:4 106:12 special 203:8 specific 5:6,10 83:23 103:8	105:1 125:24 132:9 144:13 157:4 161:5 179:17,22 180:16 211:9 specifically 7:5 9:18 14:4 132:15 149:14 160:1 164:1 184:12 speculating 204:7 spend 97:7 99:8 spoke 12:10 39:12 86:2 100:25 105:9 spoken 17:11 33:12 39:1 48:2 68:2 70:7 71:6,9 71:13 72:23 101:2 spot 13:19 spreadsheet 142:2 142:13 143:10 Stacie 7:16 21:13 23:6 68:21 69:3 103:24 145:2 staff 4:9 6:11 10:21,23 12:20 13:11 19:19 20:6 20:7,11 21:12 25:24 28:20 29:5 30:5,8,9,10,15,18 31:16,17,23,25 32:10,11 33:12 33:13,16,19,20 33:23,25 34:7,8 34:18 35:1,5,10 35:11,12,18,25 36:14,15 37:5,12 38:22,24 39:5 42:8,12,13,14 48:21,22,23 49:3 49:4,9,20,22 50:7 50:11,19 52:1,25 53:6,12,13,14,19 53:24 54:2,3,7,8 54:16,17,18 55:5 55:10,16,25,25 56:1,2,3,4 57:4 57:17 58:3 63:24	64:6,8,10,12,25 65:5,8,13,19 67:5 67:12,23,24 68:2 68:4,19 69:1,5,8 69:9 70:15,18 72:15 92:19,21 94:14,15,23 95:25 96:16 98:16,21 99:19 99:23,25 119:11 134:14 142:5 148:13 150:3 151:2,3,4,5,24 152:2,11,17,18 152:19,23 154:2 155:3 158:6 165:13 175:23,24 176:22 194:16 205:11 214:10 staff's 153:14 staffing 44:9 48:10 48:16,18,19 49:7 49:20 53:2 55:4 55:21 77:9 91:18 91:22,24 92:3,6,9 92:11,17,22 93:11,14 94:17 95:11 96:5,6,15 98:10,14,16 100:4,15,20,23 101:6 154:9 staffings 19:21 stage 60:20 70:6 141:18 224:23 stages 225:11 stakeholder 26:19 159:4 stakeholders 158:22 159:2 183:16 184:5 210:15 214:10 stance 103:9 standard 26:18 90:7 121:18 130:1 149:24 212:1,13,21 standards 210:17 211:12,13,18,23 212:13,19 213:1
--	---	--	---	---

213:19,22 standing 9:13,14 stands 156:7 stark 148:20 start 21:1 74:16,17 139:24 194:11 started 3:9 31:14 31:17 32:6 33:16 53:4 74:13 142:15,18 160:10 170:24 183:11 starting 53:15 159:17 161:15 state 122:14,22,23 185:7,7 186:16 186:17 187:5 223:15 State's 123:23 stated 44:2,7 statement 2:20 3:2 3:23,24 5:3,4 6:19 7:7,23 10:9 11:2,7,20 14:6,11 16:17 18:6 19:22 23:19 26:10,11 29:3 31:12,13 34:5 36:8 38:19 42:6 47:8,24 54:6 55:15,18 56:24 57:8,11,19 57:20 62:17 64:24 66:12,13 67:7 68:24 69:14 69:15,19,24 71:17 73:25 74:1 74:4,22 75:11 78:1 88:12 92:12 98:15 99:15,19 101:8 103:4 105:10 107:4 110:19 118:5,7 119:25 120:4,9 120:10 126:13 130:15 131:21 132:7 134:10,14 144:17 145:8 156:2,5 157:21 163:12 169:4 179:6 199:18	205:25 208:10 statements 1:16,19 statistics 80:17 stats 84:18 statutory 181:16 183:3 193:3,6 stay 213:12 staying 59:11 steep 94:10 steer 133:3 152:21 152:24 step 113:25 141:20 Stephen 37:9 44:12 158:8,21 158:25 159:6,19 183:12 218:24 stepped 77:11 steps 104:22 159:10 172:7,20 sterilise 116:15 Steve 4:24 7:15 8:9 8:10,15,20 15:24 16:8 20:22 21:15 21:16 22:23 23:12,16,20,23 24:1,16 29:8,22 46:13 48:8 51:10 54:24 55:18,24 118:17,20 121:12 131:24 132:24,25 133:1,2,2 143:6 Stewart 52:16 stop 120:18 stopped 70:24 170:24 stores 76:7,9 straight 30:8 63:12 66:3 straight-down-t... 66:15 strange 67:25 86:9 strangled 111:23 strangulated 111:20 strategic 113:22 213:25 strategies 10:14 strengthen 185:12 stress 180:11	strip 126:12,16 strong 101:12 structure 222:5 struggle 27:20 28:16 64:17 71:1 struggled 27:14,19 struggling 27:6 45:21 46:8,9 59:16 60:11 69:16,20 72:12 Stuart 43:22 50:25 study 44:7 stuff 6:16 13:16 14:23 15:22 18:23 21:2 25:22 28:6 50:9 54:19 56:13 59:5 60:9 60:14 86:15 99:7 100:5 127:14 148:17 149:7 style 33:19 sub-review 167:13 168:1 190:1 subject 84:13 167:3 186:20 190:20 198:14 subjective 99:12 submission 104:16 submissions 104:20 submit 213:13 submitted 84:6 144:25 213:4 submitting 24:14 subsequently 166:13 173:1 200:5 substance 208:19 substantiate 34:24 substantiated 144:22 145:4 147:3 successful 134:19 successfully 52:8 suffer 192:2 198:9 198:24 199:14 209:4 220:13,17 suffered 112:2 suffering 165:14	180:7 201:11 213:11 215:6 216:21 219:3 sufficient 17:13 22:9,10 sufficiently 14:22 165:6 180:22 suggest 18:16 128:8,9 suggested 68:1 91:17 107:18 125:8 157:25 158:7 199:4 200:3 suggesting 11:21 23:12 61:4 203:5 225:8 suggestion 69:22 134:8 suggests 53:1 108:24 109:18 113:23 116:18 suicidal 58:19,23 201:4,8 203:19 203:23 204:9,17 205:15 suicide 149:22 201:3,13 203:23 204:3 208:16 217:25 suitable 108:4 116:18 133:19,20 166:9 summarise 26:12 summarising 35:18 summary 87:12 summer 183:17 supervision 49:4 120:1 supervisions 49:6 supervisor 2:8 support 16:22 18:1 46:17 48:1 53:14 66:16 71:14 72:17,19 75:7,8,15,18 76:12,20 77:5 88:16,20 99:5	104:7 136:19 138:13 153:11 207:18 214:24 supporting 42:20 134:2,3,4 135:5 135:12 207:10 suppose 61:15 96:14 104:7 124:13 132:16 145:17 202:17 203:2,16 204:12 225:20 226:1 supposed 44:13 83:14 135:17 145:6 sure 1:10 8:14 9:8 9:9 10:3 11:9 49:12 50:22 51:15 56:13 58:8 58:20 82:9 83:9 87:4 88:4 93:21 96:19 97:9,16 98:7 102:23 103:1 111:23 116:16 119:10 125:18 127:1 153:10,25 162:16 164:4 168:17 172:7,20 175:16 190:8 192:4,7 197:20 202:6 217:5 222:10 225:6 surely 146:8 surge 154:17 surgery 133:10,22 surprise 130:3 148:16 surprised 29:14,15 139:3 145:23 surprising 146:4 surrounded 37:5 suspect 21:19 suspended 64:25 65:14 67:5 suspensions 50:9 suspicion 203:19 sustain 106:21 swear 148:24
---	---	--	--	---

swearing 30:1 148:8,23	talked 21:3,5 100:15,20 145:12	ten 6:1 213:6	thing 22:6 28:14 30:22 53:8 110:9	98:23,24 100:23 100:24 101:7
swift 109:9	talking 4:9 8:24,25 14:12 35:13 39:4	tendencies 58:18	135:6 146:7	103:2,7,9,22,25
system 19:12 47:5 127:9 140:20	51:3 54:18,20	tendency 42:4 58:23	147:24 149:7,14	104:17 107:8,8
141:25 163:24	61:1 89:9 134:25	tension 10:23	154:14 199:7	107:11 115:7
181:4 197:15	170:12 173:6,7	term 80:6 181:24	211:17 219:21	120:10 122:11
200:4 207:3	187:16 195:14	terms 3:16 5:4 8:24 23:11 47:14	things 11:3,17 12:22 17:3,6	124:8,15 125:1,8
213:24 218:1,15	talks 71:3	67:13 88:21 89:1	21:5 24:2,7	130:2,3,5,8,8,23
221:6	tandem 181:13 207:2 219:2	94:16 97:13	36:18,23 37:3	132:5,9,22 133:2
systemic 163:16	tangible 148:11	102:9 107:8	42:3 44:20 65:24	133:12,14,23
167:20 168:13,16	target 92:21 94:13 94:17,18	134:2,4 138:13	69:16 70:19	134:8,12 135:3,4
168:17 169:3	targets 27:7 47:2	147:9 164:25	79:25 80:22 86:2	135:4,7,15,16,21
209:12	task 184:2	168:17,19 169:1	86:3,8 103:21	135:21,22 136:13
systemically 217:18	tasks 76:14	172:24 178:9	104:12,19 105:21	137:8,16,17
	Tavistock 161:8,9	182:12 186:10	109:25 110:24	138:15,22,23
	teacher 159:19	192:18 204:22	113:9 114:7,10	139:17 141:14
T	team 14:7,25 15:7 44:2 54:11 74:18	207:12 218:21	125:22 135:2,7	142:16 144:20
T-shirt 105:15 108:13	76:17 81:9 82:19	224:4,17	135:22 138:7	145:21,22 148:17
tab 57:21 73:25 78:16 179:13	83:16,19 86:12	Terry 222:20,21	148:8 149:6	149:1,4,20
table 94:25	86:22 87:3 88:6	test 87:24 186:22	153:6,9,24 157:8	150:21,23 151:23
take 20:21 26:9 30:8 35:7,22	90:11,15 101:11	tested 28:5	161:19 169:24	152:8,23,25
38:17 43:20 46:4	109:23 110:15	thank 1:14,21 36:20 37:17	170:1 178:10	154:21,23 155:1
53:9 63:19 64:10	115:3,4,11 116:1	38:17 43:20	183:5,7,8 207:5	155:3,4,6 158:3
64:22 66:8 72:4	116:22,23 117:8	57:14 63:18	213:3 218:5	159:14 160:10
73:10 79:1	117:12,17 123:8	64:22 73:4,7,12	219:20 220:23	161:3 162:18
103:10 104:22	123:12 141:12	90:22 98:13	think 4:13,23 8:11	163:12 165:24
110:23 116:16	146:25 152:21,24	117:24,24 122:12	11:11,25 12:13	166:14 167:9,11
119:23 141:20	157:24 162:14,21	129:10 153:20,23	12:19 13:6,6	169:3 170:15
146:7,19 149:13	163:8 171:10,12	154:9 155:8,9,16	14:19 16:25	171:9 181:24
159:10 175:12	172:6,12 173:16	175:15 176:15	17:12,22 18:11	182:12 183:2,9
176:6 217:3	173:23	205:21 209:11	18:14,18,20,25	183:10,11,18
221:1	teams 66:17 76:21 103:5 176:13	221:9,12,12	18:25 19:2 21:11	184:4 186:24
taken 49:3,5 53:7 71:14 83:4	tell 3:11 23:21 24:2 58:21 83:12	222:23 226:2,2,3 226:3,10	29:16 33:2,4	187:2,19,24
113:21,24 117:11	83:13 104:22	Thanks 172:23 224:17	34:6,13 35:9	188:7 190:15
133:3 138:25	137:22 144:18	that' 21:21	36:20,21 37:4	191:9 193:17
139:3,11,17	154:12 157:21	theirs 107:12	39:16,18,25 41:8	194:9 197:24
142:7,20 169:12	195:7 216:24	them' 10:25	46:5 55:2 56:14	198:12 199:6
170:1 183:22	telling 11:19 133:5	therapeutic 200:12	56:15 57:11 60:5	200:1,11,21
186:15 187:2	template 202:1,11 202:21 203:17	thereabouts 91:16	60:24 61:16,19	201:8,20 202:5,5
196:5 202:12	204:2	they'd 30:6 31:18 32:13,14 47:18	62:1 63:1,2,16	202:7 205:3,7,24
takes 65:16	templates 202:4,7	107:12 112:24	64:4 68:25 73:3	206:15 207:4,6
talk 24:16 91:7 100:6,7 108:16	temporary 175:13	136:19 138:25	76:4 79:2 81:9	210:15 213:15
119:12 132:5		139:3 143:22,24	82:9,10,13,15	214:3 217:1
170:16 211:8			83:12 85:1,22,25	220:10,17,20
			86:3,9 87:9	221:8 222:10,19
			88:22 89:13	224:20,21
			90:16 93:5,7,13	thinking 21:17
			94:1,4 96:5	35:8,17 117:5
				210:2

thinks 107:18 third 108:4 130:24 Thirdly 7:1 thorough 86:15,22 thought 12:25 41:9 92:8 109:7 109:13 110:25 111:7 112:22 115:23 117:4 201:25 202:16 thoughts 58:23,23 101:6 threatened 29:23 threats 139:2,6 three 24:8 52:7 53:5 55:14 56:20 66:5 82:5,6 90:17 98:20 108:3 141:19 154:4 162:9 183:5 185:18 186:5,10 187:21 210:16 211:8 215:19 three-year 141:18 threshold 198:20 203:11,20 thrust 181:25 Thursday 226:13 tick-box 8:22 ticked 106:22,25 107:13 tidy 6:15 tied 108:10 tight 96:15 tightened 180:16 time 3:3 5:8 6:5 12:15 15:13,23 15:24 16:13,20 17:8,15 19:11,23 24:6,14 25:6 27:20,21,23 28:16,17,21,23 28:25 32:14 33:14 35:9 38:16 42:24 43:3 44:6 46:5,20 51:14,14 52:5,21 55:24 59:22 64:12	66:23 70:2,8,10 70:24 71:4 76:4 76:25,25 79:7 81:9,13 82:19 83:14 84:25 86:21 88:3,8,9 91:25 92:20 93:24 96:14,24 96:25 98:12 99:8 100:12 101:12,19 107:15 108:23 109:1,7,14 110:25 111:21 112:23,25 113:4 113:22 114:1 115:23 116:17 117:1,4,5,21 119:4,18 122:16 123:15 124:21,25 125:4,14,16,24 126:15,21 128:11 128:16 129:18,18 133:25 139:15 141:22 142:9 143:9,11 145:13 145:16,24 148:8 148:15 149:17 155:10 156:25 158:2,4,5 159:17 159:25 160:2,10 160:11,17,23 161:4,13 162:1,5 162:6 163:20 164:10,23 165:4 165:10,16,23 166:10 168:10,11 168:22 170:22 174:6 175:12 176:12 178:17 182:18,25 183:12 184:2,5,7,11,25 193:11 194:13 195:6 196:19,25 197:23 200:15 204:18 207:1,8 207:15 208:5,9 208:24 210:15 212:17 213:7,13 213:19	times 6:8 9:22 19:13,17,18 22:3 24:3,5 25:6,9 28:17,22,24 30:14 35:10,19 38:15 43:6 48:2 49:2 54:2 61:21 62:8 64:17 66:20 70:8 99:5 103:3 104:2,3 126:3 timescale 25:3 189:7 timescales 183:10 timing 64:5 Timms 79:6 83:22 83:25 Tinsley 10:13 12:12,14 13:8 48:5,8 77:20 title 75:17 titles 143:4 today 73:9 74:4 155:10 toilet 105:15 111:19 112:2 told 22:12 76:23 96:22 97:10,11 97:18 98:4 119:18,21 123:10 123:11 131:2,4,6 137:20,23 139:11 tolerate 66:10 tomorrow 226:9 Tomsett 141:13,21 149:7 tone 36:15 132:9 tongue 150:17 tool 178:16 197:5 223:9,25 top 41:24,24 48:14 57:10,21 63:21 122:13 topic 100:24 141:15 topics 156:5 torture 175:4 176:6,7 185:7,11 186:11,13,21 187:4,11,24	194:25 195:9,24 198:18,20 201:18 211:2 223:11 224:1 tortured 198:15 tot 80:22 total 80:1,2,9,13 totally 53:24 205:19 touch 12:24 138:14 touched 48:11 touching 76:22 tough 154:20,25 Townshend 1:4,5 1:22 57:14 63:13 63:18 73:4,10,12 226:20 toxic 220:22 trading 104:15,18 trafficking 210:19 train 10:13 60:7 151:14 trained 11:21 45:5 74:12 97:20 140:24 152:11,13 trainer 150:24 training 5:4,6,10 5:16,18,20,22,22 8:7 12:3,4 13:9 27:16,18,24 43:23,24 44:3,4,5 44:9,12,13,18,19 45:1,7,10,14,20 46:8,10,18 47:17 47:20 48:11 59:17,20,25 60:3 60:6,13,16,18,23 61:25 75:24 76:17 89:5 96:9 97:1,3,4,5,6,13 97:14 121:10 123:11 140:19 149:15,18,19,25 150:3,4,10,13,20 150:21 151:6 154:22 164:6 181:6 199:24 transcript 87:9	Transexual 180:14 transfer 113:4 116:16,17,18,20 117:8 transfer/prevent 106:2 transition 93:23 transitioned 94:5 transport 33:8 treat 160:15 treated 10:18 12:7 12:17 38:21 167:17 168:5 treating 34:14 treatment 82:5,14 82:15 164:19 202:23 tree 3:20 triage 133:18 tried 13:10 18:22 45:22 87:11 130:10 143:21 151:4 trigger 113:3 141:23 194:21 triggers 151:12 true 65:18 73:1,1,3 225:25 trust 35:5,5,10,11 163:23 trusted 10:21 35:21 try 10:13 25:15 56:11 78:3 82:22 99:12 109:8 120:24,24 137:15 143:23 152:22 153:12 trying 6:9,12 52:5 56:16 66:1 70:6 102:8 104:1,23 133:9 153:13,18 183:23,24 188:1 192:10,11 215:4 Tulley 34:9 Tulley's 107:22 turn 20:23 36:6 47:22 50:23 57:12 88:21
--	--	--	---	--

112:5 129:6 131:25 147:25 turned 97:12 103:17 107:12 133:1 Turning 68:13 101:8 turnover 44:9 TV 13:23,25 twat 29:23 twice 40:16 twister 150:17 two 1:16,19 14:25 16:10 24:7 34:12 46:17 50:5 51:9 51:13,13,20 53:7 62:5 64:25 65:24 66:4 68:4 84:19 87:16 90:16 98:19 99:2,13,17 99:23 100:12,16 100:18 116:15 118:12 121:20 124:21 142:7,21 152:15 153:21 171:8 188:23 193:21 197:25 200:19 216:24 217:22 two-minute 87:20 type 45:4 89:7 174:23 187:2 224:12 types 6:21 24:19 70:21 149:11 183:2 196:22 225:11 typical 92:17	107:22 undermined 38:22 underneath 75:23 181:7 understaffed 148:14 understaffing 70:11 understand 11:20 12:9,17 77:16 93:1 102:21 122:25 123:4 126:14 128:13 129:23 134:17 139:5 145:11 148:3 156:8,9 159:20,23 162:25 192:4 205:19 208:7 210:4 211:18 212:15,16 223:22 understanding 33:16 45:17,24 98:12 121:5,17 125:1 129:25 130:17 148:10 151:10 159:11,24 understood 46:1 98:7,8 159:22 177:11 undertake 194:24 195:9 undertaken 177:18 195:21 undertook 166:13 unfair 53:24 unfairly 38:21 unforeseen 182:13 unhappy 19:14 98:16 unhelpful 132:8 uniform 191:2 unit 157:8 178:3,4 united 101:11 units 99:9 unknown 128:9 unlawful 134:19 170:10 173:13 174:21,21 187:9	unlocked 38:23 unlocking 39:5 unnecessary 95:24 unplanned 106:5 unreasonable 213:16 unsafe 99:23 unsigned 131:2 unspoken 95:13 unsuitable 166:15 180:12 189:19,21 189:24 unsure 171:10 untoward 80:5 85:19 unusual 166:7 unwell 114:5 134:13 152:10 166:23 178:14 209:13,16 210:6 unwillingness 187:14,17 225:7 225:9 upcoming 92:18 92:18 update 48:13 102:5 updated 48:16 53:12 upper 180:16 upset 48:1 114:12 upskill 121:8 upskilling 151:3 urgency 119:2 122:18 urgent 19:16 123:14 use 7:2,22,24 8:5,8 8:18,24 10:6,15 12:13,16 18:21 18:25 19:2,15 28:3,11 31:2 56:10 61:7,9 80:18 105:18 106:1,15 110:7 114:20,22,23,24 115:2,11 116:2,4 116:6,7,8,12,13 116:21 117:10,11	117:16 118:19 119:7 121:11,24 122:1,5 128:5,15 129:19,19 130:6 130:12 149:10 167:19 209:23 210:9 useful 5:17 uses 142:6 149:10 usual 70:21 176:20 usually 158:4 174:2 175:23 176:22 188:21 utilise 207:15 <hr/> V <hr/> vacancies 93:22 vagaries 19:10 vague 190:20 valid 116:22 226:1 valuable 12:4 value 12:4 212:10 212:23 values 36:17 164:22 various 5:7 11:14 26:25 27:1,8 35:12 44:18 78:23 131:25 156:14 172:1 178:13 210:4 217:9,14,17 vast 55:3 198:12 VC 206:3 venues 97:8 VER000103 67:19 VER000215 48:4 VER000221 20:23 VER000238 44:2 45:14 VER000239 17:20 VER000260 50:24 VER000268 20:9 VER000280 44:8 veracity 212:2 verbal 30:1,4 128:25 verbatim 164:24 Verita 15:8 17:18 18:16 19:23	20:25 43:21 44:1 44:7 45:14 48:3 50:25 63:7 Verne 105:12 versa 17:17 version 83:3 132:1 191:16 versus 127:17 vice 17:17 Vicky 79:7 victim 185:11 195:24 198:19 201:18 victims 179:23 210:19 223:10 224:1 video 107:16 view 51:22 88:18 104:5 113:22 116:1 133:14,14 133:21 137:20 167:12 182:17 185:3 186:12,15 186:24 187:2 204:15 207:17 209:9,10 211:17 212:18 213:15 219:23 221:3 viewed 63:2 viewing 67:11 views 101:7 169:25,25 184:12 violence 179:24 visibility 29:1 visible 34:16 35:15 vision 53:15,17,20 visit 67:18 133:16 133:22 136:13,16 136:20,25 137:24 158:24,25 visiting 158:20 213:18 visitor 136:22 visits 33:7 48:23 49:5 64:10 133:21 136:9,14 136:16,19,23 137:5,21 138:2 vital 223:20
---	--	---	---	--

voice 1:12 voices 31:9 volunteer 133:20 158:1 vulnerabilities 151:25 152:1 165:21 189:19 194:5 197:13 204:16 205:3,11 212:10 219:10 220:5 225:5 vulnerability 152:7 158:17 161:20 165:2,4 180:20 182:21 188:5 189:13 190:23 204:23 205:24 216:12 218:17 219:16,24 220:9 223:7,25 224:8,12,22 vulnerable 153:16 157:9,16 158:11 159:13 163:18 165:6 166:15,20 167:1 168:23 169:8 170:3 172:22 173:20 176:19 178:24 179:3 180:22 181:17,21 182:1 182:12,15,20,22 184:1 185:12 188:10 191:25 192:11 193:22 197:3,10 206:8 207:24 210:10 211:5 215:15 216:7 218:18 219:18 221:4,7 224:9 225:17 W wait 28:21 30:16 70:16,19 191:23 224:14 waited 113:7,10 waiting 108:7 111:12,15 112:19 walk 34:7 108:7	walk-around 71:12 walk-arounds 24:22 walked 51:18 109:17 walking 4:8 19:5 52:3 walks 30:10 walls 25:22 want 1:22 3:22 6:8 6:17 7:5,22 9:21 10:6 14:4 26:9 27:25 29:1 32:13 32:14 42:9 43:19 47:21,22 48:10 53:9 56:23 62:3 63:18 69:13 77:21 78:1 93:18 99:4 100:6 105:1 114:7,8,11 117:2 122:11 129:6 130:13 132:1 133:4 137:22 139:21 144:13 147:25 150:4 153:7 209:1,2,4 217:14 wanted 11:9 12:5 12:12,13,16,24 13:2 22:11 92:6 92:8,21 95:15 131:17 137:4 138:9 147:24 212:18 wanting 17:15 30:24 43:15 Ward 10:10 11:3,8 11:20 12:10 13:14 36:21 37:2 64:23 65:12 Ward's 10:8 36:7 warning 68:9 wasn't 5:24,25 13:4 15:12,17 16:2 24:4 25:7 25:24 27:12,16 28:24 35:15 38:16 46:19	53:22 56:2 61:19 65:13 70:8 75:25 76:1 78:12 83:13 87:16 88:3 93:8 95:16 102:16 106:13 107:3 110:10 112:23 116:6 121:14 124:25 125:4,7 125:18 130:22 132:11 136:12,16 137:5 139:12 140:11 141:25 146:7 148:21 159:17 161:13 162:18 166:12,22 178:19,21 187:6 189:8 191:21,22 192:10,12 195:10 197:16 199:17 207:13 210:1,12 211:22 214:14 watch 29:10,12,12 149:2 217:25 watched 29:13 41:10 87:6 148:1 148:3 way 11:10 17:14 18:20 27:19 28:6 30:7 31:15,19 33:12,24 34:3 36:24 42:23 64:5 70:20 84:21 102:7 104:4 105:23 120:24 123:11 125:22 174:4 175:20 181:17 185:15 187:20,24 188:1 191:2 202:16 203:2 204:12 208:16 209:2 211:24 212:2,6 214:5 217:4 219:23 223:21 224:18 ways 53:14 121:20 183:19 201:2 we'll 78:19	We've 51:16 weak 11:1 13:12 13:13,21 wear 113:16 wearing 107:17 weather 18:20 19:1,3,10 173:24 Webb 8:9,10,15,20 29:22 44:12 Wednesday 1:1 week 4:14,16 47:10 50:16 77:2 93:15,16 105:5 week's 159:15 weekend 49:8,23 50:10,17,18 67:22 weekends 48:25 49:7 77:3 weekly 9:15 24:22 79:14 91:6 92:2 152:6 weeks 66:5 97:7 142:7,21 197:6 201:21 weight 17:22 211:14,16 212:12 213:2 welfare 3:25 19:15 93:13,14 99:6 119:11 130:14,21 132:2,6,19 133:15 134:1,5 135:9 136:1,5,24 137:11,19 160:1 165:7 166:7 180:23 went 33:19 38:15 46:20 47:10 49:25 89:5 105:15 108:12 118:11 125:23 126:11 150:20,23 160:11 175:8 183:15 189:13 191:6 195:11 199:13 weren't 8:10 9:8 15:14 28:20	32:22 33:10 42:18 54:11 83:25 97:18 104:4,19 107:7 107:15 124:16 139:5 140:23 162:6 179:10 181:11 188:12 189:20 191:6 194:8 196:25 200:20 Whenabouts 156:12 whilst 146:13 160:8 167:3 195:18 213:7 224:15 Whistleblower 52:13 white 73:23 wider 167:7 204:14 widespread 62:25 Williams 1:3,6,7,9 1:15,22 10:19 17:21 29:7 34:17 36:13 37:10 41:25 63:19 65:2 65:6 73:4,6 76:8 144:24 226:18 Williams' 37:13 willing 213:10,12 willingness 69:1 Wilson 131:24 132:22 134:24 139:9 win 93:23 window 13:1 wing 4:10 6:12,13 24:3,24 25:13 29:24 30:10,15 43:15,15,16 48:23 51:5,9,10 51:13,16,20,25 52:3,7,7 53:5,8 56:19 64:13 98:19,20 99:3,17 100:12,16 118:9 125:21 151:4
--	--	---	--	--

154:4,5,6 wings 4:1,8 18:12 18:13,24 22:2 24:10,11,12 25:5 29:1,3,9,19 30:3 30:5 31:4 34:8 35:12,15 41:13 42:8 43:11 48:19 48:21 49:3,5 52:4 55:5,14 56:20,21 58:8,11 58:14 63:2,6 100:22 154:3 wire 13:1 wish 148:18 149:3 withdrawal 152:5 withdrawn 59:11 withdrew 155:13 witness 1:16,19 2:19 3:2,23,24 5:3,4 6:19 7:7,23 10:9 11:2,6 14:6 14:11 16:17 18:5 23:19 26:9,11 29:2 31:12,12 34:5 36:7 38:19 47:8,24 54:6 55:15,18 56:24 57:8,11 62:17 64:24 66:12,13 67:7 68:24 69:14 69:15,19,24 73:11,25 74:4 75:11 118:6 131:20 134:10,14 155:13,20 156:2 169:4 196:5 199:18 221:10 witness's 196:8 witnesses 41:1 84:20 women 158:16 159:8,9 180:1 189:14 wonder 122:7 word 34:20,21,21 135:25 214:3 worded 40:2 wording 28:4,6	39:25 81:20 82:9 122:19 124:15 168:24 180:15 198:8 words 40:13 180:5 work 3:6 4:4 12:13 26:4,19 27:23 28:22 38:2 39:17 48:5 50:12 53:22 53:23,25 69:6 77:15 89:14 93:7 130:10 132:6 150:22 152:1 154:20 157:1 158:9 164:11 166:12 193:10,12 207:15 208:8 214:14 work' 53:19 worked 2:11 3:2 20:18 31:18 56:19 57:17 156:9,14,18,23 158:3,13,14 218:3 workers 26:7 220:1 working 1:24 10:20 26:13 74:22 121:18 123:6 129:20 130:5 153:1 158:2 163:8 170:24,24 183:11 193:21 199:18 219:2 220:11 workload 102:24 works 181:13 world 154:22 worn 130:12 worried 137:21 worse 218:11 worsened 219:17 wouldn't 25:5,16 30:6 31:7 35:6 35:14 36:23 38:8 42:25 43:16 62:14 67:4 97:10 98:4 102:19	113:8 115:21 127:11 135:20,20 142:11 159:21 164:7 166:11 176:2 188:17 195:6 197:7 209:18 214:23 223:24 write 28:10 144:3 144:9 213:13 writing 107:13 written 68:9 96:2 105:23 119:13,14 127:6,8 128:20 213:7 222:9 wrong 42:14,25 43:3,16 78:7 98:24 150:14 178:10 183:4 200:2 wrongly 38:23 87:19 171:21 wrote 120:4,9 X X 226:16 Y yeah 5:2 14:2 25:10 41:21 59:1 60:20 61:13 62:2 64:10,17 81:11 88:2,19 96:25 97:17 101:7 103:1 105:23 113:9 117:5,15 123:12,15 124:13 124:18 129:2 130:11 131:4 132:22 134:12,21 135:2 136:16 139:12 142:8 144:1 145:25 146:18 147:20 152:21 153:17 154:25 164:9 165:24 181:15 184:16 191:9 197:12 205:16 212:14 219:20	220:10 222:10,19 222:19 year 47:11 105:3,8 152:15 214:8 yearly 47:9 years 1:25 2:7 6:2 26:1,3 31:24 39:18,19 41:14 51:17 59:24 60:4 65:11 141:19 156:15,25 158:3 187:22 196:23 216:24 yesterday 56:5 77:21,22 78:3 80:15 81:2 84:19 130:19 young 11:8,10,15 Z Zaynab 10:7 0 1 1 53:10 73:25 79:24 105:3 118:15 122:22 188:15,17,21 201:17 215:3,18 216:8 226:18,20 1.01 117:20 1.02 117:25 10 56:25 57:8 98:5 122:12 141:2 179:24 10.00 1:2 226:9,13 100 83:14 111:23 150:21 11 71:17 122:12 139:22 180:4 11.50 73:13 117 20:23 119 7:8 12 51:25 53:25 98:5 176:10 179:6 180:9 12.05 73:12 12.08 73:15 120 6:12 56:19	99:2,11 100:13 123 98:14 125 100:15 13 1:24 23:19 50:24 80:9 105:1 141:17,21 14 11:6 50:24 80:13,14 15 1:17 63:13,15 63:16 80:16 218:3 1527 124:19,20 154 227:1 155 227:3,5 16 1:1 78:19 163:10,11,12,13 179:7,11,16 180:18 205:24 218:4 166 36:7,8 41:23 168 36:20 17 226:13 185 139:22 19 17:20 195 179:14 1987 156:16 1993 2:5 2 2 3:2 67:20 74:1 75:12 80:3 118:22 127:20 188:15,19 197:16 201:17 210:22 214:24 2.00 117:22 118:2 2.50 155:14,17 20 73:10 94:9 97:12 118:20 2001 202:6 2006 223:12 224:5 2009 2:14 31:14,17 32:4,22 33:24 74:10,14,21 2014 67:18 2015 105:7 134:11 134:21 138:6 161:16 2016 7:6,9 14:12 48:14 49:17 51:7
---	--	--	---	---

52:22 53:3 63:21 74:25 75:6 144:20 145:3 183:15 191:16 193:3 2016/17 51:4 2017 4:21 6:4 9:19 10:4 23:23 31:10 50:20 51:6 53:3 53:10 55:13 68:14 69:19 72:10 78:15,18 78:20 81:25 87:12 89:10 90:11 105:1 118:8 125:16 126:6 139:5 143:13 144:15 198:2 200:1 217:14 220:23 2017/beginning 55:7 2018 3:3 16:15 20:25 32:23 55:7 72:5,18 93:5 134:24 150:11 217:13 2019 3:9 218:14 2020 156:10,12 205:23 210:14 214:8,13 217:19 217:21 218:14 219:9 220:11 2021 214:7,13,14 219:9 2022 1:1 74:1 125:15 226:13 20th 156:13 21 88:13 92:12,15 180:25 181:12 22 77:25 181:7,12 221 227:7 223 227:9 228 51:1 23 5:4 29:4 48:14 63:7 87:7 232 51:1 52:9 239 10:12 24 2:7 6:22 33:6	65:11 83:2 101:8 119:1 193:13 24-hour 95:4 25 156:25 250 20:24 21:1 130:15,19 251 131:14,21 252 133:8 255 138:22 263 118:7 119:25 264 118:7 28 63:21 72:7 122:11 28th 21:6 29 35:3 55:19 98:15 <hr/> 3 3 2:20 3:24 26:10 47:25 53:10 57:8 63:20 66:7 78:16 80:5,25 160:5,7 167:14,15 168:1 170:8 179:13 188:15,19 199:15 210:22 3.05 155:14 3.08 155:19 30 94:9 97:7 31 41:23 33 156:15 34 66:14 193:9,11 193:13,16,18,25 194:16 195:1,5 195:12,25 196:15 197:3 223:5,19 224:2 225:16,20 35 161:21 163:17 163:24 164:6 178:16 181:2,7 181:12 193:9,11 193:14,17,19 194:18,21 195:1 195:5,12 196:1,9 196:11,16,18 197:4,15 198:13 198:14 199:17 201:16 202:3,5,9 204:17,22 205:6 205:15 210:24	217:17 218:1 221:6,22 223:5 223:19 224:2 35(1) 160:13 197:16,18,25 198:7,25 199:11 200:22 201:24 202:2,11 203:12 205:18,20 217:22 35(1)s 200:24 35(2) 197:19 198:4 200:24 201:1 203:17,17 204:11 217:23 35(3) 198:21,22 199:2,10,12 200:23 205:19 217:20 36 34:5 39 38:20 <hr/> 4 4 2:2 3:24 11:6 17:20 26:10 47:25 48:12 57:11,15,20 68:14,16 87:12 106:16 118:8 4.48 226:11 40 38:20 80:18 97:7,24 109:20 118:12,19 119:7 119:16 120:3,7 120:16,17,25 121:6,11,16,20 121:25 122:1,6,8 122:13 123:14,18 124:8,17 125:18 125:21 126:2,5,7 126:11 129:17 206:13 209:19 40(1) 123:19 42 80:18 122:8,17 123:1 209:20 44 6:20 46 7:23 49 6:20 <hr/> 5 5 14:6 27:18 44:2	45:15 169:5 5(2) 202:13 5(4) 202:21 50 97:7,24 55 67:7 55.10 180:15,19 191:10 56 130:15 57 130:15 59 36:6 118:6 <hr/> 6 6 46:25 60 36:6 55:13 56:7 56:13,17 85:9 <hr/> 7 7 1:17 20:9 31:13 48:4 78:20 101:8 123:16 156:20,21 163:10 73 226:22,24 <hr/> 8 8 72:7 107:24 118:20 119:18 145:1 84 55:20 92:12,14 92:15 85 10:8 92:12 95:24 86 88:13 87 78:1 88 91:6,13 89 78:1 <hr/> 9 9 44:8 53:10 55:15 108:15 123:17 125:15 163:11,12 163:13 179:7,11 179:16,19,20,24 91 62:17
--	---	---	--