

BROOK HOUSE INQUIRY

First Witness Statement of Karen Goulder

I, Karen Goulder DPA providing this witness statement in my personal capacity, will say as follows:

Introduction

1. I provide this statement in response to a request under Rule 9 of the Inquiry Rules 2006 dated 25 February 2022 ('**Rule 9 Questions**').
2. The below statement is accurate and true to the best of my knowledge and memory of the period 1 April 2017 – 31 August 2017 (the '**Relevant Period**'). Since receiving the Rule 9 Questions, I have had access to, and the opportunity to review, documentation that relates to the Relevant Period to assist me in providing detail. The documents I have been asked to consider are referenced within this statement.

Background

3. I joined Brook House on 1 May 2011 as an Administrator. When I commenced my employment, G4S ran the contract for Gatwick Immigration Removal Centre ('IRC').
4. I have held the role of Administrator throughout the duration of my employment at Brook House. When I started I worked in the Facilities Team as an Administrator. Then, on 2 July 2012, I was moved over to the Admin Team and I took over the

Complaints Administrator role. I note that this role has been referred to as 'Complaints Clerk' by the Inquiry.

5. I remain employed at Brook House at the present date. I am now employed by Serco, who took over the Gatwick IRC contract in May 2020. I have been working in the role of HR Administrator since July 2021.

Induction and Training

6. I started working at Brook House a very long time ago and therefore it is difficult to recall the induction process. I am not an Officer and so did not have the formal Initial Training Course that they undertake. From memory, I may have sat with different departments for a short time for them to talk about what they did and enable me to learn how to do different tasks. I am unable to recall specifics due to the length of time that has passed since I started.
7. When I became the Complaints Administrator, I took over from an individual who had left the business. Because of this, I could not shadow the former Complaints Administrator. However, I remember sitting down with Zainab Awan, PA to the Director at the time, who used to cover for the former Complaints Administrator when they were on leave. The PA showed me the spreadsheet containing the complaints log/register and the inbox where the emails relating to complaints would come in from the Home Office. I cannot say how long this training lasted as it was almost 10 years ago, but, in my opinion, it was not for a very long period. The training was very limited from what I remember and I cannot recall receiving any further training or guidance being provided after this.
8. I started to undertake the work as the Complaints Administrator pretty much from when I moved into the role and as soon as I had access to the inbox.

9. As referred to above, I am no longer in the role of Complaints Administrator. I was asked to cover an HR Administrator role back in July 2021 when another individual left the company. Once I started this new role, I liked it and was able to stay in the new HR role.

Culture

10. I have been asked by the Inquiry to comment on whether there was an identifiable culture across Brook House during the Relevant Period, and, in particular, whether this existed in the department, area or wing in which I worked. I worked in the Admin office and so did not often see many officers and I only went onto the wings a handful of times, only perhaps for a spot check to look at complaints forms. As such it would be difficult for me to comment on any 'identifiable culture' across the centre because of where I was located. I do not recall the culture feeling any different to any periods before the Relevant Period. The colleagues who I spoke with always seemed very friendly and helpful. I do not remember there being any changes in the atmosphere within the Admin office area people were always friendly and approachable.
11. I would not be able to comment on attitudes towards individuals who were detained at Brook House during the Relevant Period because I was almost never on the wings, or around residents. I therefore did not see how staff, or fellow residents, interacted with each other.
12. I do not recall having any particular concerns about how the values of G4S or its culture impacted upon the general protection of those who were detained at Brook House. I did not work within areas where the residents were, but I trusted the management to ensure people were safe here. I know they used to have regular meetings where the protection of detainees and their safety was discussed. I was occasionally present in these meetings as a minute taker. If I did have any concerns I would have raised any concerns through the appropriate channels.

13. I did not have any particular concerns about how the values of G4S or its culture impacted upon the management of staff. I trusted who I worked with and I would always have trusted that they would do the right thing under any circumstance. I trusted that management would monitor and deal with any actions necessary regarding staff. As above, if I did have any concerns I would have raised any concerns through the appropriate channels.
14. I do not recall having any particular concerns about how the values of G4S or its culture impacted upon the protection of especially vulnerable detained persons. I did not have a great deal to do with Healthcare as they usually dealt with complaints regarding health concerns themselves and so I rarely saw those as Complaints Administrator.
15. In terms of the management and leadership culture at Brook House, I always had high regard for the managers we had and got on well with them. I respected them and trusted that they would do what they should, for everyone, staff, colleagues and residents alike. I believe the main concern of the Senior Management Team ('SMT') was the safety and wellbeing of all who worked here. I feel that it sometimes seemed that the SMT did not always have time for everyone because it was such a busy centre and therefore, maybe sometimes things got rushed. I think this could have had an impact on staff. As Complaints Administrator at the time, from my point of view, any impact because of the above was usually related to trying to get complaint responses quality assured and returned on time.
16. From memory, I do not recall any occasions on which informal or “whistle-blower” concerns were raised about the treatment of detained persons. It would be difficult to recall as the Relevant Period was such a long time ago. If something like that was raised as a formal complaint, it may have come to me as a complaint, or it might have gone straight to a more senior member of staff.

Complaints – Policies and Training

17. I have been referred to document **CJS000292** which is a document outlining the complaints procedures at Brook House, updated by myself in 2015, however, I was not the original author of the document. This document was created under G4S and I am unaware whether it is still in force at Brook House or whether it has been replaced with a new document by Serco since they took over the Gatwick IRC contract.
18. I believe document **CJS000072** to be the complaints map referred to within document **CJS000292**. I am unaware whether this is the most recent version of this document. I cannot recall who designed document **CJS000072**, but the purpose of the document was just to show, very basically, what the process was for complaints.
19. From memory, document **CJS000292** was reviewed in 2015 following the update to the Detention Services Order 03/2015 (Handling of Complaints) from the Home Office.
20. I understand that document **CJS000292** was available for management and was given to the new starters on their ITCs. It would have been myself who handed out paper copies of this document to the new starters on the ITC when I spoke to them. The document formed part of the ITC training manual. I would be unable to comment on whether people read the document or how this would have been monitored. I would also be unable to comment on any arrangements made by more senior staff to ensure the information was disseminated as this would have been discussed at higher levels.

Complaints Training

21. As referenced above, complaints training formed part of the ITC for new Detention Custody Officer ('DCO') starters. I do not know what the original training package looked like, but for a certain period of time (I cannot remember specific dates), I did give talks to new staff on the ITC on the complaints process. When I conducted these talks I showed the new starters a PowerPoint presentation, along with a paper handout which formed part of their training manual. We would also have a group exercise / discussion on the complaints procedure.
22. I would not be able to comment on what training healthcare staff received as I did not deal with the healthcare staff. I cannot remember if there were any healthcare staff who attended any of my talks, but if they did, their names would have been noted on the signing in sheets.
23. I only did talks on the complaints process to new staff on their ITC. If anyone wanted to talk to me about complaints, including any new Detention Custody Managers ('DCM'), they would come to me and sit with me and I would talk through what I did and some pointers about complaints and responses based on my experience as Complaints Administrator. It was often left to the managers of DCMs, i.e. the SMT, to book them in with me if they wanted to. As the DSO had not changed in many years, new training was not often requested, some people just asked to see me to refresh themselves on the process. I believe that some of the SMT would discuss with DCMs what they might expect to see in a response to a complaint, or suggest evidence options.
24. It is my understanding that the complaints policy and any similar documents would have been reviewed when there were changes to the DSO, but this was dependant on the Home Office.

25. I have been asked to comment on document **CJS000412** which seems to be a PowerPoint which was used for the new starters on the ITC. I do not remember who created it originally, but I updated it. On review of the document, I could not confirm the date from memory, however, I can see that the 2014 figures are noted at page 4 and so I imagine that this presentation was sometime in 2015. There should be later versions of this PowerPoint presentation, as each year we updated the figures and noted any amendments. It was only shown to staff on the ITCs as far as I am aware.

26. I have been asked whether the number of annual complaints continued to rise after 2014, whether 2017 was the year in which the highest number of complaints were received and whether the figures fell after 2017. From memory alone I would not be able to answer these questions. There was a Complaints Register which had a tab for each year and also annual spreadsheets which compared the figures between different years in which this information would be visible. My role was to provide the data, not to analyse it.

Informal resolution of complaints

27. I have been referred to page 4 of document **CJS000292** by the Inquiry, specifically relating to the informal resolution of complaints. I would not be able to comment on what training was given to custody, healthcare and other staff members to assist the informal resolution of complaints as I was not in the training department. As discussed above, for a period of time, I did talk to new staff on their ITC, but I could not say how staff were trained. I was not asked to give training formally, only to sit with people when requested to talk about my role, the types of complaints we might receive, examples of evidence we might need to obtain to effectively deal with the complaint and go through the response templates. If the training team conducted any formal training, I imagine they would have a log of attendees to such training, however, as my chats with people was pretty informal, I did not keep a log of this, nor was I ever asked to.

28. If a serious allegation was made by detainees or others regarding staff behaviours and it was not made in writing and was made through informal channels, as far as I was aware, such allegations were referred to the Professional Standards Unit ('PSU'), either by a member of the SMT, Directors or via the Home Office.
29. I have been asked if G4S would self-report to the Home Office or PSU any occasions where staff were accused of assault. I would not be able to comment on this but I would have thought that anything like this would have been reported to PSU.
30. After Panorama aired, the process in relation to informal complaints changed. It is my understanding that it was recommended that any type of complaint should be made into a formal complaint to ensure that everyone was aware of it. Here when I say everyone, I refer to the Home Office and G4S.
31. Chapter 4 of document **CJS000292** discusses the process when a complaint is made against a member of staff by a detainee and the detainee then withdraws that complaint. The document states that, when a detainee withdraws a complaint, management has a discretion to continue to investigate the matter. In practice, any occasion where a detainee chose to withdraw their complaint against staff should still have been taken through the investigation process and responded to. This can be seen on document **CJS001558** in the outcome column of this spreadsheet where some cells say "withdrawn". The reason we would continue to investigate was to ensure every complaint was treated equally and fairly. It was not about the severity of the complaint.
32. By continuing the investigation, we could ensure that there was nothing that had gone wrong. It was for all complaints that people wanted to withdraw, we continued to investigate to provide a written response letter, in case there was anything that should have or could have been done to prevent the person from submitting a

complaint in the first place. If someone had property which had been lost, then the manager found it, then the manager would write up what he did and how he found the property. If it was a complaint about a member of staff, it was investigated to ensure that there had been no wrong-doing and then written up.

33. I have been asked by the Inquiry to *"please comment with reference to any of the complaints in documents CJS001558 and CJS000651"*. I am unsure what I have been asked to comment on specifically here as it is a very broad question. Document **CJS001558** appears to be a version of the Master Complaints Register/log - only for 2017. Document **CJS000651** shows the staff related complaints tabs. It would be extremely difficult for me to go through each and every complaint that was withdrawn and provide comment on the same due to the passage of time since 2017.

Document VER000276

34. Document **VER000276** contains the transcript from my interview with Kate Lampard on 7 February 2018. I cannot remember fully whether the process I describe at paragraphs 1-3, 6, 8 and 11 of this document in relation to the allocation of complaints by the Home Office Detention Services. On review of this document, I do not think I am referring to it.
35. I allocated the complaints for investigation to certain departments of the Brook House Management Team, as I had been shown by Zainab. When I sat with Zainab to train, she advised that she used to send the complaint to the SMT for that area, for example, if the complaint was about a wing, then the complaint would be sent to the Residential Senior Manager, or if it was about Centre issues (e.g. air conditioning etc.), then it would be sent to the Facilities Manager. This is how it had been done before I moved into the role of Complaints Administrator and this process was never changed by any of my managers.

36. It would be difficult for me to say exactly what proportion of the complaints failed to meet the time limits laid down on the complaints map in the allocation and investigation of complaints undertaken. This is because of the time that has passed since the Relevant Period. The complaints register/log would show any complaints which did not meet the original target date. As above, from memory, I do not know the figure/number of them that failed, but prior to the time period in question I do not believe it was vast amounts.
37. If any complaints failed to meet the time limits, the main reason for this was often linked to the DCMs not being able to interview other members of staff (due to sickness or leave) or because information was not available to them. Sometimes, the DCMs may have been tasked to do other work which took priority or had to cover different working areas which gave them less time to review the complaint. After a complaint is looked at by the DCM, the SMT would then have to approve the response to the complaint and, depending on their schedule, this could delay a complaint being responded to in time.

Lists of Complaints

38. I have been referred to a number of documents by the Inquiry, all of which relate to complaints.

Document CJS001558

39. Document CSJ001558 is not the Master Complaints Register/log that I referred to in my Verita Interview [document **VER000276**]. The Master Complaints Register/log had tabs for each of the previous year's complaints (I think going back to at least 2011) so you could see all of them on one document; along with two Staff complaints tabs. Document **CJS001558** appears to be a version which had been saved for just 2017. In any event, I had access to the Master Register/log, as well as

my manager and, when the Director's PA used to cover me, they would have access too.

40. As document **CJS001558** only shows the number of complaints logged in 2017, I would not be able to comment on whether this was representative of the number of complaints logged every year in which I was the Complaints Administrator without looking at the Master Complaints Register/log and this has not been provided to me.
41. The Inquiry have asked me to comment on 'the apparent upward trend referred to in document **CJS000412**'. On review of the document, slide 4 of **CJS000412** shows a downward number of complaints received, from 406 in 2011 to 114 in 2014. I do not know why the figures fell between 2011 and 2014. I do not know what the figures were from 2015 to 2017 as they have not been provided to me, so I cannot say if they went up or down and this is not something I recall from memory. It is worth noting that over the years we did have some detainees who were serial complainers and who would sometimes submit multiple complaints in a single day. The Home Office were fully aware of these individuals. Detention Services (part of the Home Office) allocated out the complaints and would decide if they would be separate complaints allocated to us with different numbers, or if they were of a similar nature, then Detention Services may have chosen to ask for multiple complaint forms to be grouped together and responded to as one.
42. I have been asked to specifically review line 262 in document **CJS001558**. This relates to a complaint from D1527 which was investigated by the PSU and substantiated and all five members of staff the complaints were against were dismissed. I do not know if anyone of these staff members left before the findings were substantiated or before any disciplinary measure could be taken, as I was never involved with that side of things, nor would I have been told about them.

Document CJS000651

43. **CJS001558** (2017 complaints tab) and **CJS000651** (staff tabs) would have all formed part of the Master Complaints Register/log. The Master Complaints Register/log had a tab for each year's complaints and then it had the two staff tabs (like in **CJS000651**).
44. **CJS000651** was not a separate spreadsheet kept in relation to complaints against the staff. As above, it would have formed part of the Master Complaints Register/log. The information contained within document **CJS000651** appears to have been saved separately for only the years 2017-2018 and I can only assume that it is an extract that has been provided for the purpose of the Inquiry. I know the tabs on the Master Complaints Register/log went back further as it was designed to be a running log where all staff related complaints could be seen. The second staff tab was a table to show officers names and the outcome of the complaints they were involved in. There was the ability to filter and sort by officer name and it was then possible to see how many complaints they had been involved in and their outcomes.
45. As I have not been provided with the Master Complaints Register/log, which would have shown previous years information, I cannot comment on whether the information shown within document **CJS000651** is consistent with patterns before and after 2017. I would not know this information off the top of my head.
46. In relation to the tab labelled 'staff totals 2017-2018', where the names of custody staff appeared more than once, my manager and the Directors had access to the spreadsheet to review and determine what to do with this information. I was not involved with that as I was only the collator of the information and sent the monthly report to them for their review.

47. Any issues to do with hygiene and cleanliness would more than likely have been dealt with by the Residential SMT, it may have also involved the Aramark cleaners where necessary, depending on the exact issue.
48. Any resolution of the complaints and/or action taken to achieve that resolution was dealt with / monitored by the Senior Managers and it was not something I would be involved in.
49. I could not comment whether the SMT, or anyone else, revisited complaints on an audit basis to ensure solutions were implemented. If they did, I cannot remember being advised of this. My manager carried out audit checks (spot checks) on complaints for assurance purposes, but I do not know if they specifically reviewed ones with actions required. If it was a PSU complaint, then the actions were reviewed by the Directors and dispersed to the relevant SMT to deal with. Again, I would not always get updates, if I did, I updated the complaints register/log. There was also a PSU recommendation spreadsheet too which logged full details of the outcomes and actions from PSU reports and this is where we would update about actions from those investigations.
50. In my Verita interview [document **VER000276**] I mention preparing reports for the SMT. From recollection, the format of this report was originally a word document which covered the previous month. The document had charts for figures/stats comparisons and a table with some details about the complaints from that month. This later developed into a spreadsheet which was sent to the Directors on a Monthly basis which had monthly totals based on area and category; comparison charts (3 months' worth to see for trends); it had a tab where information from the Master Complaints register/log was copied into; it also showed complaints for the month where officers were involved (any allocated complaints and PSU). There was also a PSU recommendation spreadsheet too which logged full details of the outcomes and actions from PSU reports and this is where we would update about actions from those investigations.

51. The report was provided to my manager and directors for them to disperse accordingly. I was not involved with how they cascaded the information, nor did I attend the SMT meetings in which they may have been discussed.

Complaints referred to and from PSU

52. In relation to the complaints investigated by the PSU, the complaints would come to us from Detention Services. Detention Services would advise us that they had sent a complaint onto PSU for consideration, and then PSU would be in touch if they chose to investigate the complaint. It was Detention Services who would decide if a complaint was of the sort that should be sent to PSU and they would then send it on.

53. To provide comment on how I may have assisted the PSU in its investigations, the PSU would contact me and ask for any relevant information. This might include reports such as Security Information reports ('SIRs'), Incident Reports ('IRs') or Use of Force Reports. They could also ask me for staff rosters for availability for interviews, to book rooms for them and they may also ask me to obtain statements from staff. They would often ask for CCTV or Body Cam footage and I would request this, along with all the other documentation from the relevant departments.

54. I am unaware whether PSU sent separate emails to, or had separate contact with, managers at Brook House, but usually when I received the email from Detention Services advising that a complaint had been sent to PSU for consideration, I would then forward this onto the Directors, and to a HR manager if the investigation was into a staff member, for them to review. Directors may have then communicated this to the SMT, but I was not involved in these communications as far as I can recall. When the PSU contacted me to obtain information, when we knew they had definitely taken on the complaint, I may also send it to the Security Manager when asking for the information, so they were aware too.

55. I would not be able to say whether I was informed of *all* of the PSU investigations. Anything I was made aware of, I noted on the complaints register/log. In my Verita interview at document **VER000276**, I said that I was probably made aware of 99.9% of PSU investigations as there could have been the odd one that I was not advised of, but I would not know if they had not told me.
56. The Inquiry has asked me to provide the monthly comparisons I refer to at paragraph 51 of my Verita interview [document **VER000276**] for 2017. I cannot provide these comparisons as I no longer have access to this information.

Specific Complaints – D2953

57. The Inquiry has noted to me that *'D2953 made complaints on numerous occasions about having been assaulted/hit/bitten three times by an officer in June 2017. This included complaints to the Kerry Copping on 20 June 2017 (CJS0073642), a formal complaint on 23 June 2017 (CJS001616), several calls to the G4S Equalities Advisory Support Service (CJS001506), and reports to DCM Page (CJS0073644) and Nurse Donna Batchelor (HOM03224) on 29 June 2017. Although D2953 received a response to his healthcare complaints on 05 July 2017 (CJS001616), no investigation was carried out into his allegations of assault at the time, nor was the matter passed to the Home Office's PSU. It was subsequently investigated by G4S in September 2017 (HOM032609) and by the PSU after that (CJS001506)'*. I have been asked a number of questions regarding the complaints made by D2953 which I will answer below.
58. I was not advised of any issues that arose from SIRs, Use of Force Reports or Healthcare complaints. The first I would know about these would be when we were allocated the complaint.

59. I would not be able to provide comment on why this matter was not investigated at the time. SIRs were submitted to Security and it would have been for them to review and set out any actions, they were also reviewed by the Security Manager. I do not recall being aware of it.
60. The process which should have been followed is outlined in document **HOM005048**. Having taken into consideration documents **CJS001506** and **CJS0073656**, I do not know why the process for the Security team was not followed on this occasion. Until PSU asked for assistance, I was not aware of the issues. As Security had reviewed the SIR it would have been their responsibility to report to the relevant people. I was never involved with seeing or being advised about issues that had been raised through SIRs or IRs. I did not have access to those documents. With regards to the Healthcare complaint at document **CJS001616**, I would not have seen this as Healthcare were sent their own to investigate. To provide comment on document **HOM032609**, I have never seen a document like this.
61. The Inquiry have referred me to an email from November 2017 in which PSU Investigator Rukshana Rafique notes that the failure to refer the matter on “*raises some real questions including; how and why this matter was not referred to Detention Services and in turn PSU back in June 2017*” (document **HOM005049**). To provide a response to this, I cannot comment as I do not know why it was not referred sooner. I did not know about it until I was contacted to help provide information.

Panorama and Reaction

62. When I saw the broadcast of Panorama I was horrified, upset and saddened by what I saw. I was also frustrated that it also seemed quite one sided in that the programme did not provide any context to the incidents shown. There was no mention about what may have lead up to certain instances, the behaviour from residents, and/or what staff have to deal with on a daily basis. I was also quite scared after watching

Panorama due to not knowing what had happened and what could have happened, but about what was then going to happen.

63. When G4S was first advised that the programme had been made and was going to be aired, they sent a report of information about the instances and I was part of a team who were tasked to gather evidence linked to each section. I was only involved in this briefly as I went on pre-booked annual leave shortly after we were told. Once I returned from leave, this had mostly been done, so then I was the point of contact for the PSU who were carrying out investigations. I liaised with them to provide any reports/footage/organising interviews/statements etc. I also had some involvement with the Audits team with regards to the reports that came out afterwards and chasing up on actions which had been given to SMT to do. I did not manage these processes, I just assisted.

<u>Statement of Truth</u>	
I believe that the facts stated in this witness statement are true. I understand that proceedings for contempt of court may be brought against anyone who makes, or causes to be made, a false statement in a document verified by a statement of truth without an honest belief in its truth.	
I am content for this witness statement to form part of the evidence before the Brook House Inquiry and to be published on the Inquiry's website.	
Name	MRS KAREN TRACY GOULDER
Signature	<div style="border: 1px dashed black; padding: 5px; display: inline-block;">Signature</div>
Date	11 03 2022