

RESTRICTED (when complete)**WITNESS STATEMENT**

(CJ Act 1967, s.9; MC Act 1980, ss.5A(3) (a) and 5B: Criminal Procedure Rules 2005, Rule 27.1)

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Statement of: Callum TulleyAge if under 18: Over 18 (if over 18 insert 'over 18')Occupation: unemployed

This statement (consisting of 9 page(s) each signed by me) is true to the best of my knowledge and belief and I make it knowing that, if it is tendered in evidence, I shall be liable to prosecution if I have wilfully stated in it anything which I know to be false or do not believe to be true.

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SignatureDate 23/11/2017

Tick if witness evidence is visually recorded

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(supply witness details on rear)

From 26 January 2015 to 7 July 2017, I was employed by the multinational security company G4S, working at Brook House Immigration Removal Centre (Brook House). From 6 March 2017 until 19 September 2017, I was also employed by the British Broadcasting Corporation (BBC) as a specialist researcher working with BBC Panorama, assisting with Panorama's investigation into Brook House. During my time working for Panorama I was trained in, and subsequently undertook, secret filming and undercover reporting at Brook House. The product of some of that reporting and filming went on to be included in a BBC Panorama programme broadcast on 4 September 2017 ('Panorama: Britain's Immigration Secrets').

The purpose of this statement is to explain the background to my employment with the BBC, summarise how I undertook my reporting, and to describe a number of incidents I was witness to in the course of my employment by G4S.

BACKGROUND

I started working for G4S on 26 January 2015, initially as an Assistant Custody Officer. Following completion of further training by G4S, I was promoted to the post of Detainee Custody Officer (DCO) in June 2015. I was based at Brook House throughout my employment with G4S apart from a period in March and April of 2016, where I was posted in Tinsley House IRC because of an outbreak of chicken pox: **Sensitive/Irrelevant** in Brook House".

During my time working for G4S, I became concerned about the conditions in Brook House, and the attitudes and behaviour of some staff members there towards detainees.

On 11 January 2016 I watched a BBC Panorama Programme called 'Panorama: Teenage Prison Abuse Exposed' which was broadcast on BBC One. The programme showed events in the Medway Secure Training Centre (Medway), in Rochester, Kent and highlighted abuse and mistreatment of young offenders by staff. I learned from the programme that Medway was also run by G4S. At that

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point, I was already concerned about the conditions for detainees in Brook House, and some of the behaviour of some G4S staff I had seen there, which was echoed in the Medway Panorama programme. I was motivated to contact the BBC Panorama team in the hope that one day there might be a similar investigation into Brook House, if I told them what I had experienced and seen working there.

JANUARY 2016 – MARCH 2017

On 12 January 2016, I sent an email to the BBC Panorama contact email address explaining that I was a DCO at Brook House. I also gave Panorama my contact details.

A couple of weeks later, I was contacted by a member of the Panorama team. For the next fourteen (14) months, although I was in contact with the Panorama team, I continued to work solely for G4S. I did not commence work for the BBC until March 2017, as described later in this Statement.

When I was first contacted by the BBC Panorama team, we talked about my experiences, up to my contacting Panorama, of Brook House, including the treatment of detainees and attitudes of some G4S staff. I stayed in intermittent contact with the team over the following months, by telephone. During this time, I continued to observe events and behaviour at Brook House, which I would relay to the team when we spoke.

From April 2016, BBC Panorama Producer Joe Plomin was my primary point of contact at the BBC. Joe asked me to make daily diary entries of events at Brook House, based on my observations, which I would be able to share with the BBC Panorama team. I had regular debrief discussions with Joe from April 2016 to February 2017. Throughout our discussions it was clear that the BBC had not made a decision in advance about whether to investigate Brook House, but was keen to be informed about what I was witnessing there. I was always ready to make complaints to appropriate authorities if I was aware or concerned that any incident was going to transpire which posed an immediate risk to life or limb.

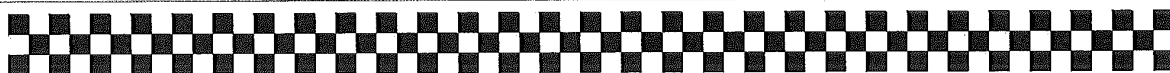
We discussed the possibility that I might train and work for the BBC as an undercover operative, assisting the Panorama team in an investigation into Brook House during this period. I spoke to a number of previous undercover operatives to discuss their experiences of working undercover. However, it wasn't until February 2017 that Joe Plomin told me that Panorama wanted to go ahead with the investigation into Brook House, including undercover reporting, and asked me if I wished to be the undercover operative. I did, and I agreed to start working for the BBC in March 2017.

ONBOARDING AND TRAINING

On 6 March 2017, I began my employment at the BBC, working under the supervision of Producer Joe Plomin. Between 6 March 2017 and 23 April 2017, I completed a period of training at the BBC, directed by Joe, to prepare me for the period of secret filming.

My training comprised mandatory online training, as well as further training over five weeks which was focused on preparing me for the period of undercover reporting I was to undertake at Brook House, and ensuring I was equipped with the necessary specialist knowledge and skills to do so.

I was issued with a BBC laptop for this training period and I completed the BBC online training



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courses, provided by the BBC Academy, which were mandatory for all BBC Panorama employees. These online courses included media law and data protection training, UK anti-bribery training, as well as online production safety and BBC editorial standards courses.

Following completion of my mandatory online training, I was given specialist training over the course of five weeks which was focused on camera work and filming; and training on undercover reporting and associated techniques.

I watched an introductory DVD training film provided by the Panorama team, providing an overview of conducting investigations of this nature, as well as previous Panorama undercover investigations. After that, I had a number of detailed sessions with Joe Plomin, the production team and external experts covering all aspects of how to operate as an undercover reporter. My training included sessions on wearing and operating secret cameras and microphones; and guidelines and techniques for undercover operatives, including instruction and role play exercises focused on reporting techniques. I also received training from outside experts including on secret filming and training to ensure filming did not affect safety of detainees, other officers or myself.

BEGINNING OF UNDERCOVER PERIOD AND FILMING

My first day successfully filming (without any kit failure) at Brook House was on 24 April 2017. The last day of filming, and my last day at Brook House, was 6 July 2017. On 7 July 2017 I informed G4S that I would not be returning to my post.

From 24 April to 6 July 2017 (inclusive), I worked thirty-seven (37) shifts at Brook House. I successfully undertook secret filming on thirty-four (34) of those shifts.

FILMING PROCESS / FILMING ROUTINE

To carry out the secret filming, I wore a secret camera and microphone provided to me by the BBC. I wore the camera kit during my shifts at Brook House and undertake secret filming of certain events and conversations in the course of my shift, in accordance with my training.

The camera I wore during secret filming had a variable battery life, usually in the region of four (4) hours. My shifts at Brook House were thirteen (13) hours long, so it was not possible to keep the camera running at all times throughout the shift. In any case, I would not keep the camera continuously running during shifts, but switch it on and off as necessary, in line with the guidelines I had been trained with, particularly guidance regarding minimising impact on the privacy of detainees and staff.

After the end of a shift, I would drive to an agreed location and meet with the Panorama production team. At that point, I would normally record a video diary entry to camera. I would also hand over the camera kit with the day's footage to the production team.

In the video diary, I would summarise the shift and any particularly notable events which had occurred. I recorded thirty-three (33) video diaries in total during the filming period 24 April 2017 –

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6 July 2017 (inclusive). After I had completed the video diary, I would complete a written diary entry as well. I always completed written notes and these record the events of the relevant shift.

Once I had completed my video and written diary entries, I would talk with the Panorama production team. We would discuss the day's shift, and often the previous day's footage which they had reviewed. The team might ask questions about the footage or particular events shown in it, if I had not covered a particular point in my video and written entries for the last shift (or if they had a particular question, for example about the name of an officer or a detainee).

If the production team asked about events on the footage, or I remembered an event or a detail which I had not mentioned in my written or video diary for the previous shift, I would make a supplemental note to that written entry, indicating that it had been added at a later stage.

On Tuesday 25th April 2017 I was working my regular shift of 0815 to 2115 hours. During the latter part of my shift somewhere around 1930 hours, I was on a constant supervision, supervising a detainee on E wing. The male detainee, whose name I do not recall, was from Eastern Europe and had recently been transferred from HMP Maghaberry. I was sat outside his room, number 8, which is located at the far end of the wing, observing his actions and chatting to him. Although he was under constant supervision due to a risk of self-harm, he was not restricted to stay in his room and so was free to walk around the wing as long as I stayed with him.

I sat outside his cell facing down the wing, with his cell door open to my left. Across from me to my right, opposite cell 8, was cell 7 which had the door closed. The detainee in there was being observed by another DCO named Clayton Fraser. The door had a large glass panel which is used to observe the actions inside. I could see that this detainee was stood at the glass panel and was head butting it. I knew the detainee to be **D1527**. I estimate to have known him for about 2 months. I turned my body towards the cell on my right in order to film what was happening, whilst remaining in contact with the detainee I was observing. Clayton was not doing or saying much, he was just watching. It was at this point that the detainee I was supervising walked out of his cell and went towards the other end of the wing and sat down, I joined him and sat at a table near the servery. A female DCO named Neeha was nearby.

Within a very short space of time I could hear noises coming from the far end of the wing, and I noticed that the door to **D1527**'s cell had been opened. I thought that Clayton would need some help so I asked Neeha to take over the ACDT (Assessment, Care in Detention and Teamwork log) for the detainee I was supervising. She agreed to take over the constant supervision and so I walked to the cell where **D1527** was. As I entered the room I could see Clayton in the middle of the room, and DCM (Detainee Custody Manager) Steve Laughton stood by the inner wall by the toilet area looking at **D1527** who was lying on the floor with his head by the toilet and legs toward the inner part of the room. The position he was lying in was a small space and movement was restricted due to the position of the toilet and the wall.

At this point it became apparent that **D1527** was attempting to self-strangulate using something which looked like some cloth. It all happened quickly but I think DCM Laughton said something like "Get Staff". I exited the room and shouted at Neeha to get some staff. I returned to the room and could see that DCM Laughton was using a piece of equipment called a Fish Knife to cut the ligature away from his neck to stop him from strangling himself. **D1527** was pulled from the area he was in and helped up onto the bed in order to calm him down. At this point no restraints had



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been used on him.

DCM Laughton then said something Like "What are you doing?". I believe at this point DCO Charlie Francis also arrived in the room and possibly a nurse named Jo Buss. I am unsure of exactly when Jo Buss turned up however. [D1527] then stood up and went into a rage, making demands. I do not recall what the demands were, but he was in a rage and was visibly upset and angry

Then he sat back down and placed a phone battery into his mouth, attempting to swallow it. I then sat on the bed opposite him. I cannot recall the exact timings but at some point whilst he had the battery in his mouth, he spat towards me due to him choking on the battery. He did not spit out the battery however. I am sure that Steve Laughton and Clayton Fraser were still present along with Jo Buss. It was at this point that Detainee Custody Manager Nathan Ring arrived and was stood either just outside or inside the room. I left the room at the same time Steve Laughton left. DCM Laughton was going to complete a Use of Force Report due to what had previously occurred with [D1527]. Nathan Ring made several derogatory comments towards [D1527] upon his arrival. This was normal behaviour for Nathan. I am unsure at what point the battery was removed from [D1527]'s mouth. A short while later I was aware that [D1527]'s cell door was shut and locked. I assumed that everyone had left him, and that the battery was removed from his mouth to ensure he did not try to swallow it again.

I returned to Neeha, who was still at the far end of the wing with the eastern European detainee, to take over the ACDT log again.

Within a few minutes I was aware again of noise coming from the cell where [D1527] was. I again handed over the ACDT log, and thus the constant supervision, to Neeha so I could assist. Neeha agreed to continue with the constant supervision before I handed it over to her. As I walked towards his room I was joined by another DCO named Yan. I had known Yan for about 9 months but only as a colleague at Brook House. We arrived at the cell at the same time. Already in [D1527]'s room was Nathan Ring and Jo Buss. Within a very short period of time another nurse may have arrived. Charlie Francis was also there I believe.

Clayton Fraser was present throughout and was quickly joined by other staff. I asked Joe Buss what [D1527]'s problem was and she replied saying "He is an Arse basically". When I asked Yan the same question, he replied saying something like "Acting like a 3 year old." Nathan Ring said [D1527] would "Start Bouncing around like a Duracell Bunny".

I could not actually see [D1527] at this point as he was lying back in the same position as before, by the toilet. I could see him in the mirror but couldn't actually see if he was self-harming. DCM Nathan Ring and nurse Jo Buss entered the cell. I followed them in soon afterwards. Clayton was also present in the cell. Yan Pascali and Charlie Francis appeared to have left. Nathan soon left me to watch [D1527]. Joe Buss also left with Nathan. Clayton stayed in the cell with me. Then I could hear [D1527] choking, heaving, and gasping for breath. His own hands were around his throat and he was trying to choke himself. I asked him to stop and started to try and pull his hands away. When I pulled his hands away from his throat he stopped gasping for breath. I then pulled him into the middle of the cell and repeatedly said something like "What you doing? Stop It!" I called for help by shouting something like "Someone get staff, give me a hand". I was aware that Clayton was behind me, but he wasn't doing anything. Charlie Francis then arrived. I took hold of [D1527]'s left arm and Charlie took control of his right arm to stop him from choking himself. Clayton took hold of his legs for some reason, but he should have taken control of his head. At this stage he wasn't resisting just in a state of distress. Yan then entered the room and knelt with [D1527]'s head between his knees. Yan was leaning down towards his chest with his hands around his throat and his thumbs on the front of his neck around the Adams Apple area. Yan's fingers were down the side and around

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the back of his neck. At this point there was no pressure being applied, but Yan should have just been supporting D1527's head. Jo Buss had at this point entered the cell. D1527 was not in a good way, still very angry and upset. Whilst we were all in this position D1527 became very agitated and started to resist us whilst we were still on the floor holding him. Charlie Frances and I continued to hold his arms. Yan then exerted an extremely high amount of pressure onto D1527's neck. It was a phenomenal amount of pressure, which appeared to be concentrated onto D1527's airways. The pressure was being exerted onto his neck around his Adams apple. I could hear D1527 gasping for breath. Yan was positioned low down on his knees with his elbows out wide, leaning over D1527's body with his back facing towards the ceiling and his buttocks facing towards the door. I believe Yan adopted this position to hide or disguise his actions from anyone that may have come behind him. Only Charlie Francis, Clayton Frazer, possibly Jo Buss and I could have seen the choke. Yan then said, in quiet voice "Don't fucking move you fucking piece of shit" and "I'm going to put you to fucking sleep". I could see D1527's Eyes bulge from his head, they just sprung open really wide and his face went red. It was as though he was using his eyes to beg for Yan to stop. D1527 then began to froth at the mouth. His eyes then rolled towards the back of his head and he fell silent. D1527 had stopped resisting. I would say that Yan had hold of his neck for a total of about 30 seconds. There was a minimum of 6 seconds of extreme pressure. When he fell silent I really thought there was going to be a fatality so I said to Yan, "Yan Easy, Easy". Yan then released the pressure from D1527's neck. Jo Buss was stood behind just inside the door. It's possible she might not have seen the choke because of the way that Yan had positioned himself. As Yan eased off D1527 started to make sounds. It sounded as though he was choking on the froth coming from his mouth. He started to talk but his voice sounded odd. He was struggling to communicate. He was trying to get his breath back and so his chest was heaving as he was gasping for breath, whilst at the same time trying to complain about his neck. I genuinely had thought Yan was going to kill him.

We rolled him into the recovery position. I had let go of his arm and moved to the rear of the room. One of the officers used a fish knife to cut off D1527's shirt, mainly to stop him from self-harming again. He was then assessed by the nurse Jo buss who quickly gave him the OK.

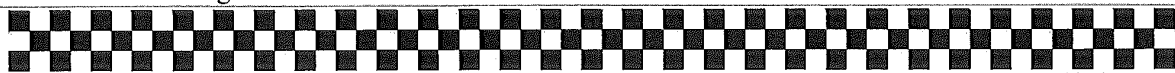
D1527 was lying in the recovery position in a state of shock, crying hysterically and generally being noisy.

I was at this point instructed to leave the room along with Clayton which left Charlie and Yan in the room. Charlie then left just before Yan. On his way out of the cell, Yan placed his hands on D1527 and rolled him onto his back as though he was a piece of shit. I thought this was Yan showing real contempt for the detainee and was happy for him to choke; however by this point he was breathing okay, as the froth seemed to have cleared.

I was knelt about 50cm from Yan, almost facing him with totally unobstructed view. The room was illuminated with artificial lights built into the ceiling. I would say that it would have been approximately 30-45 minutes between the first time I entered the cell to the last time I left.

Once I had left the room I went to the toilet to compose myself as this upset me. I returned to the wing office where Yan was. I spoke to him and he then said "As it stands, No Use of Force". I repeated it back to him, "No Use of Force Report?" He then said "Yeah, as it stands hold fire" or words to that effect. Yan then left the office as Jo Buss entered. She said to me, "Are you writing that down as a use of force?", I replied saying "According to what Yan said no as it stands"

Jo Buss replied to me stating she could not write due to a bad hand and then read out what she had written, "Assessment by duty nurse, continued observations due to demeanour and attempted self-strangulation." She then informed me that she was going to her office to write war and peace. I remained in the office for a while before leaving. I could see Clayton still observing D1527 at the far end of the wing. Yan was also sat down there too.



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I went down to where Yan was and spoke to him. I apologised for being a wimp about C & R (control and restraint). He then told me that when he was a Prison officer at HMP Wandsworth, that as a group of prison officers they would cut people to make it look as though they were self-harming. He took pleasure in telling me this story, as though it should impress me. I said something similar to "Can't get away with that here" to which Yan replied something similar to "Yes you can with the right Management".

When speaking to **D1527** during the course of my time at Brook House, I would refer to him as **D1527** which was his first name. For the purpose of the programme he was referred to as **D1527**

On Monday 24th April 2017 I was working my normal 13 hour shift as Sports officer which gave me free range of all the wings within Brook House. At some point during this shift I walked into E Wing and went to Room 1 where I saw **D1527** lying face down on his bed, motionless. In the room with him was DCO Calvin Sanders who was sat on the desk between the 2 beds. I said to Calvin "What's wrong with him, what's he doing" Calvin said **D1527** "keeps digging his fingers into his neck". I can't remember what else was said apart from Calvin saying he would "get through to him eventually." I did not really take any notice of this remark and left the room. I cannot recall if I actually spoke to **D1527** but I know he was lying face down on his bed motionless.

On Thursday 4th May 2017 I was talking to a detainee named **D687** when I heard shouting coming from D Wing. I made my way towards the wing and entered. I could see a male who I knew as **D1527** stood on the suicide netting which is suspended between the landings to prevent people jumping down and committing suicide. **D1527** was threatening to jump off. I said to him "Don't be silly." Later I was stood next to DCO Clayton Fraser who was watching. I asked Clayton what was the best way to deal with someone like **D1527** Clayton replied saying "What Yan did". I took that to be a reference to what Yan did on the 25th April in **D1527** room. Eventually he was talked off the netting by another detainee. I was also told by an officer that it was to do with him having an issue over some washing up.

Later the same day I was on escort duty with DCO Aaron Stokes and DCO Calvin Sanders. Whilst we were all together Calvin suggested that he slammed **D1527** head on the desk and bent his fingers back. During this conversation I asked Aaron what was the best way to deal with someone like **D1527** Aaron replied saying, "Turn away and Hopefully he's swinging". I took this to mean that he wished for **D1527** to hang himself.

On Monday 8th May 2017 whilst on duty I walked into the office of C wing where a female DCO whose name I don't know and DCO Calvin Sanders were. I said "I was with your mate the other day" referring to **D1527**. Calvin then said "I went out of the room to make sure no one was watching. When he was banging his head on the table, on the bounce I went..." he then demonstrated banging **D1527** head on the table with his hand. At this point he paused and said he locked his hand or arm to stop him from doing it. He then demonstrated twisting **D1527** fingers. Calvin went on to say that "If you're self-harming, you're an attention seeking little prick" or similar. It was as though he was bragging about what he had done to him

On Sunday 7th May 2017 during the late afternoon I was tasked to get kitted up into riot gear as part of a team because a detainee named **D275** was protesting on the suicide netting. I was there in case we were needed to intervene to save life. We were standing in the stairwell out of view in case the Tactical National Response team did not arrive in time. Whilst we were waiting in the stairwell John Connolly who was the control and restraint supervisor told me to say to the detainee "Listen

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here nigger, listen to me". At the time I did not process what he said as I was anxious about filming in riot kit. However since then I have had time to process this and I was offended by what he said due to the nature of its meaning. In the end we did not need to intervene as [D275] was removed by the TNRT.

John Connolly on a number of occasions has shown complete contempt and hatred towards the Detainees. About 3 shifts before I went undercover, Connolly ordered the strip search of a detainee for no real reason. Connolly said "Take his fucking clothes off". The detainee was stripped of his clothing as DCO's stood around laughing at him. He was shown no dignity. John Connolly referred to him as a "Cunt." This verbal abuse towards detainees was commonplace in Brook House.

On 8th May 2017 I was sat in the E wing office with DCO Derek Murphy and a second DCO who I only knew as Jordan. Derek Murphy was relaying a story about a detainee who was refusing to pack his stuff up as he was about to be removed from the centre. He told us that the detainee had placed razor blades into his mouth, so Derek used a chopping motion with his hand striking the detainee around the neck area. I took this to mean that he used force to get the detainee to spit the razor blades from his mouth, however, it could have been taken that he just hit him. The method used is not taught in control and restraint so is not an approved technique. Any decision to remove items like this should be made by a manager and would be based on a dynamic risk assessment at the time.

On 14th June 2017 whilst on duty on E Wing, I was playing pool with DCO Daniel Lake. Dan told me that he had watched Sean Sayers, who is also a DCO at Brook House, backhand a detainee across the face. I took this to mean that Sean Sayers slapped a detainee with the back of his hand. Dan Lake did not go into any other detail. About one hour later I found DCO Sean Sayers in the staff room and spoke to him about what I had been told earlier. DCO Sayers in a very formal and black and white way said "I picked him up, took him into the room and fell on him accidentally, using his face to get up". The tone of his voice was very sarcastic and he was smiling.

On 4th July 2017 I was working my normal 13 hour shift. At some point during the afternoon a First Response was called to a self-harming incident. I arrived after about 30 seconds from when the 1st Response was called. As I arrived I could see 3 or 4 other DCO'S stood outside the detainee's room, I knew the detainee as [D865]. The other DCO's were just looking at him. I could see that he had something similar to a thick lace tied around his neck. It was obvious that there was something around his neck and I could not understand why no one else could see it. A DCM present at the time was Chris Donnelly. He was stood directly in front of me and had direct sight of [D865]. Donnelly said "There is nothing around his neck". I could not really understand why no one could see the ligature around his neck. I was still stood outside the room, and yet I could see it clearly. I said "No, what's that tied around his neck". At this point Chris Donnelly took his fish knife from his belt and cut the ligature off. I was stood about 2 meters away and could clearly see the ligature. [D865] was lying on his front, head to the side, was motionless on the floor and appeared unconscious. I could see that the thick lace was tied to a TV bracket which would have been fixed to the wall around 7 feet up and would have held the TV which was also on the floor with the bracket. He tried to use the bracket to hang himself. Chris Donnelly demonstrated hatred towards the detainees. I am sure he was intent on letting the detainee suffer. I would say that it was at least 2 minutes between the first response being called and Chris Donnelly removing the ligature from the detainee's neck. The nurse came in soon after to check him over. At this point [D865] was sat on the bed. The nurse tried to establish why he appeared down, and Connolly just said "Were you trying to kill yourself?"

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On the 5th June at 8pm there was a 1st response to healthcare where a detainee was kicking off because the nurse would not give him his medication. There was a large line of detainees waiting behind as a result of this. In the line one particular Jordanian detainee was getting very agitated saying that he needed his medication. The nurse eventually said to the detainee causing the hold-up that his medication would be brought to his cell in the early morning around 2am. This detainee and the Jordanian in the queue then began shouting at each other and staff and officers had to intervene to break up a potential fight. They were both ordered back to their wings. Shortly after, outside the library, when returning to my post, I saw the original detainee who had caused the healthcare incident lingering outside, not on his wing. I tried to convince him to go back to his wing and as I was doing so the Jordanian detainee came round the corner and a fight ensued with the Jordanian detainee kicking the other. Staff broke up the fight and the two men were escorted back to their respective wings and could clearly see what was happening or being said.

I have personal knowledge of all the people as I have either worked with them or knew them as detainees. Brook house is illuminated with artificial lighting and daylight comes through the windows. Since ending my employment at Brook House I have not had contact with the persons mentioned, apart from **D275** who I interviewed for Panorama in Tunisia in August 2017.

All footage recorded on my covert camera was captured and stored on the internal memory and was downloaded by Jo Plomin each day.

I am willing to support the Police in any action they decide to take and will attend court if I am required to do so.

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