

1 Friday, 25 September 2026
 2 (10.15 am)
 3 Introductory remarks by THE CHAIR
 4 THE CHAIR: Good morning. This is the second preliminary
 5 hearing of the Manston Inquiry. Can I thank all Inquiry
 6 Participants who have attended this hearing today and
 7 for the collaboration and assistance in responding to
 8 the requests made by the Inquiry legal team for
 9 disclosure and witness statements.
 10 I'm also grateful to all the Inquiry Participants
 11 for their commitment, within the submissions that I've
 12 received, to continue to assist the Inquiry in
 13 preparation for the oral hearings.
 14 I have noted that all Inquiry Participants want the
 15 hearings in this Inquiry to start as soon as possible in
 16 the New Year. I want to be clear that I share that view
 17 and agree that this is the timetable that the Inquiry
 18 should be aiming towards.
 19 Part of the purpose of this hearing is for me to
 20 hear submissions today in order that I can be sure that
 21 the timetable I set is achievable and to enable the
 22 Inquiry to report its findings as quickly and
 23 effectively as possible in fulfilment of the Inquiry's
 24 terms of reference.
 25 In a moment, Counsel to the Inquiry, Ms Dobbin

1

1 King's Counsel and Ms Moffatt, will provide an update in
 2 respect of the work of the Inquiry since the first
 3 preliminary hearing, address the matters on the agenda
 4 requiring case management directions and the submissions
 5 received on each matter. I will then hear oral
 6 submissions from those who have requested and been
 7 allocated time to advance their submissions orally
 8 today.
 9 I am particularly grateful for the written
 10 submissions received, which I have read and considered
 11 with care in advance of this hearing, namely the joint
 12 submissions on behalf of the detainee Inquiry
 13 Participants represented by Duncan Lewis and Deighton
 14 Pierce Glynn, the joint submissions on behalf of the
 15 detainee Inquiry Participants, represented by Wilsons
 16 solicitors, Gold Jennings solicitors and Bindmans, and
 17 the submissions on behalf of the detainee Inquiry
 18 Participants, represented by Bhatt Murphy, and the
 19 submissions from the Home Office and the
 20 Ministry of Defence.
 21 The determinations and directions that will be
 22 issued following this hearing will confirm the start
 23 date and venue of the oral hearings alongside an updated
 24 witness timetable and running order.
 25 Turning briefly to practical arrangements for

2

1 today's hearing, the proceedings are being recorded and
 2 live-streamed. This allows the hearing to be followed
 3 by a greater number of people than would be able to be
 4 accommodated in this hearing room. Also, as is routine
 5 in public inquiries, the broadcasting of this hearing
 6 will be conducted with a three-minute delay. This
 7 provides an opportunity for the feed to be paused if
 8 anything unexpected is aired which should not be. We do
 9 not expect that to arise over the course of today, but
 10 I mention it so that those who are following proceedings
 11 from further afield can understand the reason for any
 12 short delay.

13 Having made those brief introductory marks,
 14 Ms Dobbin, can I turn to you, please, to make your
 15 submissions? Thank you.

16 MS DOBBIN: Thank you.

17 Submissions by MS DOBBIN

18 MS DOBBIN: Chair, this is the second preliminary hearing in
 19 the Manston Inquiry. The first took place on 15 January
 20 of this year. At that point the disclosure process was
 21 on the cusp of beginning and no statements had been
 22 disclosed to Inquiry Participants. Much has happened
 23 since that date and the principal purpose of today's
 24 hearing is to provide an update, for you to hear
 25 submissions from Inquiry Participants, in order to

3

1 enable you, after it, to set a timetable for the
 2 substantive hearings at which witnesses will give
 3 evidence.

4 You are familiar with the Inquiry Participants. An
 5 additional one since January is the East Kent Hospitals
 6 University Foundation Trust which was appointed in May
 7 this year. The Inquiry is grateful for their
 8 contribution to its work, particularly given that the
 9 Inquiry is charged with investigating how and in what
 10 circumstances Mr Ahmed came by his death on
 11 19 November 2022. I will, on behalf of the Inquiry, set
 12 out an update in relation to the separate lines of
 13 investigation in relation to his death.

14 In advance of this hearing, Inquiry Participants
 15 received a note from Counsel to the Inquiry, the whole
 16 team, which set out those matters which would be
 17 considered at this hearing. Inquiry Participants were
 18 invited to provide written submissions and to indicate
 19 if they wish to make oral submissions too. As you've
 20 said, submissions were provided on behalf of the
 21 Home Office, the Ministry of Defence and by those firms
 22 who represent people who were detained in Manston and
 23 only those firms indicated that they wish to make oral
 24 submissions.

25 I will therefore provide an update on the Inquiry's

4

work and then make some observations on those submissions. Ms Moffatt will deal with some of the more specific issues that have been raised about additional witnesses from whom statements should be taken or additional people and who ought at this stage be added to the provisional witness list.

Before I do that, I wanted to say something on behalf of the Inquiry about the context in which it is taking place. At the first preliminary hearing on behalf of the Inquiry, I observed that the issue of small boats was a contested one within our society, an issue prone to generating strong feeling and division. Despite, according to the Migration Observatory, that by September of this year yearly boat arrivals had reached their lowest levels since 2021, tensions continue to run and it is hard to ignore that this is an inquiry which is taking place in a crucible of hostility and antipathy on the part of some — and I emphasise "some" — to the group of people who are at its centre.

All the more reason, then, for this Inquiry and its participants to proceed with courage and not to feel in any way inhibited in investigating those matters within its terms of reference. Recent events reinforce the need not to reduce people to their immigration status or to deal with them in the abstract but to ensure that

5

there is understanding in this Inquiry of who they are, where they have come from and, insofar as they wish to, to say what has happened to them. This Inquiry must facilitate that and ensure that people who were detained in Manston are supported to give evidence before you if they wish. I will return to how the Inquiry can do that.

This is also the moment to say something about the role of the legal team in this Inquiry. The lawyers to any inquiry are independent of all the parties. This independence is crucial to its fairness. They take no side, they advance no case, nor any single narrative to the exclusion of others. Collectively we call evidence and we provide advice, but that is all. It is for you, Chair, to come to conclusions on the principal issues before you and it is not for the legal team to pre-empt those. The legal team must not foreclose important issues and must ensure that you have a sufficiently broad spectrum of evidence, be it documentary, written or oral, from which to draw. The legal team must not seek to select evidence or witnesses in such a way to narrow the range of conclusions available to you within the terms of reference. It does this by gathering and disclosing a breadth of evidence, by presenting that evidence fairly at a hearing and ensuring that witnesses

6

have the opportunity to explain events from their perspective and have an opportunity to answer criticisms too.

The Inquiry team advises you on issues of fairness as they apply to all Inquiry Participants rather than from the perspective of any single participant; in other words, to advise you on how to best ensure justice to all Inquiry Participants. But we don't have a monopoly on wisdom and I emphasise again the importance that we place on collegiality.

The questioning of witnesses may be forensic and challenging but it remains at all times an inquisitorial process. It is not part of the Inquiry's function to determine civil or criminal liability of individuals or organisations nor is any individual on trial by proxy. There are important reasons for this. Amongst them there are no pleadings nor any fixed set of allegations that individuals are facing or a case that they are meeting. Witnesses don't have the same rights that they would have if they were a party in a trial and the same rules of evidence that apply in a trial do not apply in an inquiry.

The Inquiry must operate within its terms of reference and subject to the overarching directive that the Inquiry should consider no more evidence than is

7

reasonably necessary to discharge and address the terms of reference. Equally, the terms of reference require that the Inquiry should be undertaken without undue delay to enable a final report to be produced as quickly and effectively as possible. These are important constraints and they complement each other. It is vital that inquiries are concluded and reports produced as quickly as possible. To the extent that evidence is based on recollection, it may become less reliable over time. The public impact of findings may be diminished and recommendations may become redundant by passage of time.

There is a toll on Inquiry Participants and witnesses, who may have years of uncertainty or feel like their lives are in suspense if findings are delayed. That's why the Inquiry is bound to gather only that evidence which is necessary to discharge the terms of reference.

Every inquiry, including this one, is confronted by submissions about the need to seek substantial disclosure, the need to take statements from a wide range of people and to have lengthy hearings at which very many witnesses are called. There is an inherent tension in squaring those requests with the need to convene hearings and conclude the Inquiry as soon as

8

1 possible. The balance is usually struck by examining
 2 the necessity and fairness of any proposed course.
 3 Before addressing you on progress made and
 4 submissions as to further investigations you should
 5 conduct, it may assist if I set out some themes which
 6 have emerged from the Inquiry's work to date relevant to
 7 the matters that you will hear submissions on from other
 8 Inquiry Participants related to experts and further
 9 witnesses.
 10 At its heart, this Inquiry concerns the detention of
 11 people in conditions which the Home Office accepts were
 12 unlawful, in that people, including women and children,
 13 were detained in excess of 24 hours, often far in excess
 14 of 24 hours, in accommodation not designed for anything
 15 more than waiting in for up to 24 hours. It was
 16 encapsulated by Lieutenant General Skeates, whose
 17 findings in his report the Home Office accepts. He
 18 said:
 19 "The crisis at Manston occurred because it was
 20 forced to fulfil a role and function for which it was
 21 not designed, namely as an accommodation centre.
 22 This resulted in egregious breaches of the detention
 23 limit ... "
 24 He went on to say:
 25 "This was because of the lack of capacity to process

9

1 and disperse sufficient small boat arrivals each day."
 2 Behind that neat encapsulation, however, sits
 3 a range of other issues that this Inquiry must probe,
 4 not least the cold reality of what living in a form of
 5 detention designed for waiting in meant and that
 6 children, sometimes only months old, were equally
 7 exposed to these conditions. Accommodation at Manston
 8 was principally in the form of marquees, with some
 9 unused buildings brought into use in the autumn of 2022,
 10 some for use by families. There is evidence that
 11 conditions across the Manston site became abject as the
 12 number of detained people there, and for increasing
 13 periods of time, grew. Contemporaneous records suggest
 14 that these conditions included not having access to
 15 basic necessities.
 16 By way of snapshot, based on contemporaneous
 17 records, in relation to the barracks blocks, it was
 18 documented in September of 2022 that there were
 19 60 families across 11 rooms. They hadn't showered, no
 20 hot water or been given clean clothes for nine days, had
 21 no entertainment for children and no one had
 22 communicated with them. An email noted that families
 23 were in and out of each other's rooms and no one was
 24 keeping an eye on them. Given how many babies and young
 25 children were in the building, the author wrote, this

10

1 was "really worrying".
 2 In October, in relation to the Wellington block, it
 3 was reported:
 4 "Only one toilet for 81 people and no showers;
 5 broken beds and broken glass panel and doors; no soap in
 6 any of the bathrooms and no hand sanitiser; need more
 7 food and fruit, not enough for the people they have in
 8 the block. No games, activities or toys for children.
 9 Had one football. Now it's gone [as read]."
 10 In October in relation to tent 8:
 11 "13 days on site in the same clothes and the same
 12 towel, nowhere to dry towels after they have been used
 13 so used same, wet dirty towel for 13 days. Clothes
 14 smell and no wash packs [as read]."
 15 There is a contemporaneous reference to there being
 16 no antibacterial wipes available and to some detainees
 17 resorting to use toothpaste to soothe bites and to
 18 migrants with visible wounds going untreated for several
 19 days. There is even reference to a detained person
 20 using a croissant wrapper to dress a wound.
 21 The build-up of people at the site required
 22 increasing numbers of personnel to detain them. The
 23 Home Office contracted Mitie Care and Custody to detain
 24 people whose detention had formally commenced. Amongst
 25 matters under investigation is the length of time that

11

1 people could be detained for before they were formally
 2 detained and whether, for example, people bailed so that
 3 their detention, formally ended, in fact remained
 4 detained. You will want to consider carefully
 5 allegations that the legal regime was manipulated to
 6 reduce the appearance of illegality.
 7 There were insufficient Mitie marquees to detain
 8 people. This is understood to be because of
 9 difficulties in recruiting people to be detention
 10 custody officers and the length of time needed for
 11 people to be trained. That meant that people were
 12 guarded by personnel from different contractors. There
 13 are separate questions as to the legality of people
 14 being guarded by personnel who were not trained
 15 detention custody officers.
 16 In addition, a large number of security guards
 17 staffed by a large number of subcontractors worked at
 18 the site. These were security industry guards.
 19 Ostensibly their role was to guard outside marquees and
 20 buildings and the perimeter fence. However, two
 21 safeguarding incidents that the Inquiry is investigating
 22 in relation to young children concerns security guards.
 23 The net result is that this was a site staffed by
 24 public servants and a proliferation of contractors and
 25 subcontractors. The underlying evidence suggests that

12

1 this posed risks on a number of fronts, which will be
2 explored in evidence. This includes, in relation to
3 vetting, safeguarding and reliance on staff who
4 themselves may not have been working legally at Manston.

5 The contemporaneous documents record concerns raised
6 about personnel on the site at the time. The British
7 Red Cross, who had spent some days on the site, reported
8 observing restrictive, derogatory and callous attitudes;
9 also unacceptable behaviour regarding the treatment of
10 unaccompanied children and, in their words, "a deeply
11 unpleasant culture of disbelief towards those children
12 which permeated the entire site".

13 One of the recommendations that the Red Cross made
14 was that the role and independence of the social work
15 team at Western Jet Foil should be clarified for
16 transparency and regular monitoring and quality
17 assurance of their practices. Ms Moffatt will return to
18 the suggestion that more evidence might be required
19 about the role of social workers.

20 Other allegations of misconduct include reports of
21 the inappropriate use of force. This includes a member
22 of Mitie staff reporting seeing an alleged assault on
23 a young person, who they said had a very young face, by
24 staff from another contractor; snapshot pictures taken
25 of detained persons; multiple reports of officers

13

1 swearing at detained persons. This includes a member of
2 MTC personnel, who is a witness in the Inquiry,
3 reporting the use of language by the personnel of
4 another contractor as being "appalling" and describing
5 it as "obscene"; detained people being told by officers
6 that they wouldn't be given food if they used the
7 toilets; and allegations that detained persons'
8 complaints about the length of their stay were not being
9 recorded; and language being used towards detained
10 persons such as that they had made the decision to come
11 to the UK.

12 Separate to this are concerns about detained
13 people's property. There is an added dimension here.
14 Clearly, for people who have travelled very far from
15 home, those possessions which they do have and their
16 access, for example, to their phones for photographs,
17 not just means of contact, may assume a very great
18 significance. I'll come back to this later.

19 Children.

20 As set out in the note in advance of this hearing,
21 the position of children is a matter of great concern in
22 this Inquiry. Generally, the circumstances in which
23 children can be detained in England are very limited
24 indeed. In Manston, both tiny children and teenagers
25 were detained in the same, at times desperate, on any

14

1 view of the accepted facts, conditions as adults. The
2 CTI note asked whether any Inquiry Participant took
3 issue with the Inquiry's assessment that these are
4 children who are likely to have endured multiple
5 traumas, culminating in the frightening journey by small
6 boat to England. No Inquiry Participant demurred from
7 this assumption.

8 Section 55 of the Borders, Citizenship and
9 Immigration Act 2009 places a duty on the Secretary of
10 State to make arrangements for ensuring that
11 immigration, asylum, nationality and customs functions
12 are discharged having regard to the need to safeguard
13 and promote the welfare of children in the UK. You will
14 wish to investigate and consider in the evidence called
15 before you how the Home Office reconciled that
16 fundamental duty, amongst others, with the detention of
17 children in marquees or in inadequate buildings without
18 access to nutritious food or somewhere adequate to sleep
19 or to basic sanitation.

20 There are contemporaneous reports of people in
21 family tents emptying toy boxes and carrying them into
22 toilets to fill with water in order to wash clothing and
23 themselves. It's conspicuous that the person who sent
24 the email setting this out said "This must stop as it's
25 creating problems", not "This must stop because there

15

1 must be adequate facilities for people to wash and to
2 wash their children".

3 Another member of personnel reported taking a little
4 boy with his mother to see the medics because he had
5 cramps. According to this person, even without
6 assessing him, the medic told them, "Well, tell him to
7 stop eating crisps then", to which the staff member
8 replied that there was hardly a large selection of
9 fibre-rich foods in the marquee for little children.
10 Again, these are just snapshots, they're allegations,
11 but revelatory of day-to-day events, not just relating
12 to adults, but to small children too, which you will be
13 invited to consider.

14 Body-worn footage shows an individual who may have
15 been from Border Force shouting at a group of people,
16 including small children. It's a demonstration of how
17 children were exposed to situations which, on any view,
18 would be frightening; in this instance, by what appears
19 to be a public servant. However, it's also right to
20 point out that the same member of MTC staff who
21 documented the language, the appalling language as he
22 saw it, of some personnel from another contractor was
23 the person who filmed this incident and wrote up an
24 incident report about it. He recorded his concerns in
25 writing and he also recorded them on camera.

16

1 So there were people like this on site and I wish to
2 reiterate on behalf of the Inquiry that, if there are
3 others who have not been approached for a witness
4 statement but who would wish to come forward, that the
5 Inquiry would be glad to hear from them.

6 Inquiry Participants will be aware that there are
7 two separate safeguarding incidents involving children,
8 both of which raise questions as to how they were
9 responded to. The Inquiry is still in the process of
10 gathering evidence about these, but they are a stark
11 reminder as to how exposed children may have been in
12 Manston, not just because of the physical conditions but
13 because of the adults around them.

14 Those experienced in safeguarding will know that
15 situations involving vulnerable people will attract
16 people who pose a risk to them. You will wish to
17 examine what consideration was given to these risks.
18 According to a contemporaneous record made by the police
19 at the time of the first safeguarding incident in
20 September 2022, there were, in his words, no "SOPs for
21 Manston or safeguarding to call/refer to at the time".
22 If this was true, it would be a profoundly serious state
23 of affairs.

24 It suffices to say that the body of evidence raises
25 very serious questions for senior officials and

17

1 ministers as to how the detention of children in these
2 conditions was tolerated on humanitarian or legal
3 grounds.

4 Healthcare.

5 Unsurprisingly, given the conditions that prevailed,
6 infectious diseases, like scabies, spread. Detained
7 people were found to have diphtheria. Until
8 October 2022 and despite the lengths of time that some
9 people were being detained in Manston from that summer,
10 medical services were provided by paramedics. These
11 paramedic services were provided by two companies,
12 Aeromed and Medevent Medical Services. In October 2022,
13 Medevent began providing doctors at the Manston site.
14 Aeromed was contracted by Mitie Care and Custody to
15 provide paramedic services to those people detained in
16 the marquees run by Mitie. There is evidence that
17 Aeromed initially operated from a small room within the
18 family marquee without hot and cold running water,
19 wipeable flooring, suitable ventilation or a lockable
20 door. Concerns were raised by them to Mitie Care and
21 Custody about the working conditions for its clinicians
22 "in a room/area that was not fit for purpose", in their
23 words.

24 Medevent were contracted to undertake an initial
25 healthcare check on detained people upon their arrival

18

1 at Western Jet Foil. They also provided healthcare to
2 those people who were detained in marquees and buildings
3 not operated by Mitie Care and Custody. You will hear
4 evidence about limitations in the healthcare provided,
5 including from witnesses who were detained at Manston.

6 However, criticisms at the time included from
7 official sources. In November 2022, the Director of
8 Public Health for Kent County Council wrote to the
9 Permanent Secretary at the Home Department, noting, and
10 this is in his words:

11 "The basic hygiene and sanitation facilities at
12 Manston were not appropriate and fell short of what
13 should have been available;

14 "There were no plans for (i) infection prevention
15 and control, (ii) outbreak management;

16 "The onsite medical team did not have access to
17 basic medication and wider health services were not
18 available;

19 "The health and welfare arrangements for children,
20 including access to childhood immunisations, the
21 nutritional value of food for developing babies and
22 children, dental care, mental health support, structured
23 days and suitable play areas for children and maternity
24 services were insufficient [as read]."

25 This is one perspective on the shortcomings of the

19

1 healthcare. There are other documented references.

2 The death of Mr Ahmed in the same month that the
3 Director of Public Health made these criticisms enables
4 the Inquiry to narrow its lens, to look in detail at the
5 healthcare afforded to someone both within Manston and
6 in two separate hospitals.

7 Before turning to Mr Ahmed, it may assist if
8 I explain to Inquiry Participants that a significant
9 piece of work that the Inquiry has undertaken over the
10 past few months is drafting the statement of facts and
11 disassembling materials for Dr Hard, who the Inquiry has
12 now instructed to provide an opinion on the
13 configuration of medical services. Inquiry Participants
14 may understand that piecing together a factual account
15 and the underlying materials about how medical services
16 were provided in order to seek an opinion was not easy.
17 This is a product of how they were provided; their
18 ad hoc development, as growing numbers of people came to
19 be detained for longer; that provision was split between
20 two entities who treated a detainee depended on where
21 they were detained in Manston; the lack of electronic
22 records; the apparent lack of documented processes,
23 including, for example, referring people out of Manston
24 for treatment; and the lack of any clear and coherent
25 evidence from any single witness able to provide an

20

overview of how medical care was provided. And, Chair, I don't say that as a criticism. It is because of the way medical services were provided that there doesn't seem to be that one person who can provide such an account.

Turning then to leadership.

The evidence gathered thus far throws light on the policy elections and the decisions that were made by Government departments which culminated in large numbers of people, at their peak 4,000 people, being detained in accommodation designed to be a holding room. You will hear more about this and the reasons for the lack of available accommodation to transfer people detained in Manston to. You will wish to examine, in due course, when it was ultimately determined that Manston would operate on the basis that detention would only be for 24 hours; the basis on which it was determined that this was sustainable and would remain sustainable; the risks that detaining people for 24 hours would not be achievable; the extent to which the risk that people would be unlawfully detained was appreciated or tolerated and why.

There is then a series of questions that arise about decision-making, when the position became far more acute and it was clear that people were being held longer than

21

24 hours and in the sorts of conditions I have described.

The issues do not seem to be limited to detaining people unlawfully beyond the point of 24 hours or even in grim conditions but, rather, the extent to which it was foreseen and then accepted that Manston would operate outside the legal framework for a short-term holding facility, if de facto that's what it was; put bluntly, whether the entire operation of Manston was, from a certain point, outside the law.

It's important to reflect that the evidence demonstrates that at the time questions were asked about whether the routine unlawful detention of people beyond 24 hours was consistent with the Civil Service Code of Conduct. That's an issue that will be explored with those in positions of leadership and with ministers. But, again, it's right to reflect that there is evidence that the conditions in Manston caused some public servants who worked there or visited to express alarm and concern. One senior civil servant observed in an email at the time:

"Just on the train back from the visit to Manston. To be frank, I'm really struggling for words. It was the worst conditions I've seen in 20 years working in this environment."

22

He set out some of what he observed and continued:

"There is so much more I could write but feel emotionally drained from speaking with families who I could not assist with even basic requests. To see children and their parents lying on cardboard or blankets or towels with only thin sheets to cover them jammed nose to tail was distressing."

He concluded:

"Political decisions have forced hard working officials and suppliers into an impossible position. This will end up as a Public Inquiry and ... rightly."

Clearly whether or to what extent political decisions forced public servants and contractors into difficult or impossible situations will be a matter of importance in this Inquiry. The question of why people were detained in these conditions requires consideration of why there was not appropriate accommodation they could be transferred to.

One question that looms over any examination of why in this Inquiry is whether people detained in Manston were exposed to these conditions because they were not regarded as entitled to decent conditions or because of indifference or hostility to their humanity or because the attitude towards them was punitive because they were arrivals by small boat. There may of course be other

23

reasons and witnesses will have the opportunity to explain those.

The strategic ministerial decisions that were made about Manston are one thing, how people were treated at Manston by public servants or by personnel from private contractors and their subcontractors is another, and I repeat that the evidence does suggest that people voiced and documented concerns about the conduct of other staff. You will hear more about that. But the vulnerabilities of detainees, evidence of hostilities towards them and evidence of specific incidents of misconduct has led the Inquiry to ask questions and to investigate what, if anything, was done to address the risk that some people working at the site would be prejudiced against and hostile to those persons who they had a duty to protect.

May I turn then to Mr Ahmed?

Mr Ahmed, aged 31, died in hospital with diphtheria during the course of his detention. Diphtheria is a notifiable disease under the Infectious Disease (Notification) Act 1989 and the updated 2010 regulations. It was once a deeply feared disease in the UK but, fortunately, mass immunisation has largely eradicated it amongst the population of this country, but that is not true of other states, especially those

24

where immunisation programmes have been disrupted. For unvaccinated individuals, without proper treatment, diphtheria can be fatal in around 30% of cases, with younger children at higher risk. It's important to repeat that these are risks to unvaccinated people and that the vast majority of people in the UK are vaccinated.

The Inquiry's terms of reference require it to conduct what is in essence an investigation within its overarching investigation into how and what circumstances Mr Ahmed died. I am glad to be able to report that the Inquiry has been able to make contact with Mr Ahmed's family and had a discussion with a family member. This has enabled the Inquiry to provide some information to his family that they were unaware of about his death. His family have been provided with information about the Inquiry and about becoming an Inquiry Participant. I think I can say, quite simply, that the Inquiry will do all it can to support their participation in the Inquiry should they wish to do so.

Since the hearing in January, the Inquiry has obtained an expert report from Dr Killingley in relation to those factors which may have contributed to Mr Ahmed's death. This report has been circulated to

25

Inquiry Participants in draft so that they have an opportunity to suggest further questions or to put further documents to Dr Killingley. Although focused on Mr Ahmed, the report does raise broader issues about the adequacy of healthcare available at Manston, about the access that detained people had to medical treatment outside Manston and systems for the testing and treatment of people with suspected diphtheria.

In Mr Ahmed's case, it was suspected by a doctor at Manston that he had diphtheria, but Dr Killingley's draft report sets out a series of concerns or criticisms about how he was treated after this point, including that he wasn't immediately referred to hospital; what happened when he was referred to the accident and emergency department of a local hospital. Despite the apparent understanding, on the part of a doctor at Manston, that Mr Ahmed would be seen by an ear, nose and throat specialist at hospital, he wasn't; and that he returned from hospital at Manston to stay in a marquee and without clear medical follow—up as to what had actually happened in hospital. Some separate issues are raised about an apparent delay in taking Mr Ahmed to hospital on 18 November.

But, in summary, having arrived at hospital very late on the night of 18 November, Mr Ahmed had died at

26

around 5.30 in the morning of 19 November. He was handcuffed until around 2.00 am.

My learned friends will have noted that Dr Killingley says in his report that the Inquiry may need a further expert report about a very specific aspect of Mr Ahmed's critical care on 19 November and the Inquiry has set this in motion by identifying a potential expert and asking some initial questions about Dr Killingley's concerns.

As it stands, this report, which again I stress is in draft, suggests a succession of missed opportunities, both in Manston and in the two hospitals, potentially to provide Mr Ahmed with appropriate care. Of course, whether they caused or contributed to his death will be a matter for you.

Outside issues of causation, the basic lack of a bed for Mr Ahmed, that he was in a marquee at all, the evidence that he didn't receive all of the doses of antibiotics that he had been prescribed, the lack of apparent understanding on the part of anyone responsible for his detention that he may have been suffering from a life-threatening illness, that on 18 November he was brought to hospital in a van and his handcuffing in hospital at a point when he must have been close to death all require separate examination.

27

Chair, I've set these matters out because it's important to demonstrate that the limited temporal scope of this Inquiry nonetheless belies an inquiry of considerable complexity which encompasses a number of different strands of investigation. The volume of disclosure to the Inquiry has exceeded expectation. In part that reflects the sheer number of organisations which were involved in Manston during the period of time under investigation. Since January, the Inquiry has completed its review of the disclosure received. This has resulted in just under 16,500 documents being marked for disclosure to Inquiry Participants.

As matters stand, 8,400 documents have been through the Inquiry's review process and disclosed. The Inquiry is confident that by the end of September almost 10,500 documents will have been disclosed. The Inquiry has also changed its document management system and migration to that system will have been completed by the end of September as well.

Since the last hearing in January, the Inquiry has received draft or final statements from 160 people. Of these, 69 statements have been provided to participants. Of the 160 people who have provided draft or final statements, the Inquiry has received 74 from people who were detained in Manston.

28

The Inquiry identified some 16 further witnesses from whom it wished to take statements or further statements and I can confirm that almost all of those have been finalised. It is in the process of making a further request for a statement from the Home Office in relation to allegations of misconduct. It's only because of a huge amount of work that's taken place behind the scenes that the Inquiry has been able to review and provide this level of disclosure and that number of witness statements.

There have been obstacles, as was set out in the CTI note. It has already been pointed out that the Ministry of Defence didn't apply until after the disclosure process to Inquiry Participants had started for the redaction of junior officials' names on national security grounds. Chair, you provisionally refused that application, in part because insufficient evidence had been provided to support it, but you made a final determination on 15 May to grant it. The Inquiry had proceeded to provide the MoD with documents that it intended to disclose in order that the MoD could review them, but I think it remains right that as of today the majority of these documents haven't been cleared for disclosure by the MoD.

Inquiry Participants also know that even more

29

belatedly and not until 28 July the Cabinet Office applied for the redaction of certain junior officials' names too. This application was circulated to Inquiry Participants on 11 August and, Chair, it's objected to. The Home Office indicated on 24 July that it would seek anonymity for a witness whose name had already been disclosed in materials disclosed to Inquiry Participants. The Inquiry didn't receive that application until last week, so Inquiry Participants will know why they haven't seen that.

We have also explained in the note that material providers have had documents for review for well in excess of the three-day timetable and ensuring that this material is pushed through will be a focus in the coming months. That's because the Inquiry needs to ensure that it maintains an ambition to disclose a rate of 2,000 documents a month in order to convene a hearing as soon as possible.

It is obviously the moment that Inquiry Participants must inform the Inquiry if there are to be any further applications for anonymity or for redactions in relation to Government personnel or contractor personnel. I'll invite you to make some directions about that after this hearing.

It is also right to say that the process of

30

gathering statements has been delayed by witnesses who wouldn't engage with the Inquiry or ignored the date by which the Inquiry asked for statements or even delayed answering requests for clarifications after they had provided their statements. Inquiry Participants know that two Government ministers failed to provide statements on time, despite being given a number of extensions. Eventually they did, but that didn't just cause delay to the Inquiry's ability to disclose their statements. This sort of conduct on behalf of any of the witnesses who did that wastes time and costs.

However, as matters stand, only two individuals refused outright to provide a statement. One is a former employee of Mitie Care and Custody; the other owned the company who provided marquees. As regards the former, the Inquiry wished to seek evidence from him about escorting Mr Ahmed on 18 November to hospital. However, it has a considerable number of other sources of evidence about the issues that it would have wished to ask this evidence about; and, as regards the former, the owner of the marquee company, we've made clear that the Inquiry didn't need evidence from him in order to understand the conditions or for you to make findings about the suitability of that form of accommodation.

So despite its lack of powers to compel evidence,

31

almost every single person has provided a statement and the Inquiry has received a huge amount of disclosure, including the sorts of highly damaging, candid materials that record contemporaneous concerns.

The submission is made by Bhatt Murphy on behalf of the cohort of people they represent that the Inquiry may be unable to meet its terms of reference or provide an investigation which meets the requirements of Article 2 or 3 without powers to compel the production of evidence under the Inquiries Act.

There are examples of cases where it has been concluded that a power to compel witnesses is required in order to meet the requirements of Article 2. For example, in the Edwards case, before the European Court of Human Rights, that court held that the Inquiry had not discharged its Article 2 investigatory duty in that case, amongst other reasons, because it had no power to compel witnesses. As a result, two prison officers declined to attend. One of the prison officers had walked past the cell shortly before the death was discovered; so, in other words, these were critical witnesses in the Inquiry into Mr Edwards' death.

In the case of Mousa v the Secretary of State, the High Court held that a power of compulsion was necessary where there was a real risk that military personnel,

32

1 accused of misconduct relating to the death of detainees
2 in Iraq or their colleagues would be reluctant to give
3 evidence.

4 Sir John Thomas observed that there was a real risk
5 that the witnesses wouldn't give meaningful evidence.
6 He said:

7 " ... in our view, the overwhelming probability is
8 that soldiers will be reluctant to give evidence at all
9 and certainly to give evidence that involves any
10 significant criticism of a colleague. Thus a form of
11 inquiry where such persons can be compelled to attend
12 will be the only effective and fair way of determining
13 what happened."

14 In the case of MA, BB v Secretary of State for the
15 Home Department — this is the case related to the
16 Brook House Inquiry — Mrs Justice May concluded that
17 not every effective Article 2 or Article 3 investigation
18 would need a power — sorry — would necessitate a power
19 to compel the attendance of witnesses; in other words,
20 that it was a fact-sensitive assessment. But she said
21 that, whilst most Article 2 investigations are likely to
22 require it, few Article 3 cases may do so. In relation
23 to Article 3, one reason was because those who had
24 experienced the treatment were alive and able to provide
25 evidence.

33

1 In relation to Article 2 and Mr Ahmed, the position
2 is this: the Inquiry has obtained witness statements
3 from the paramedics it requested them from, it has
4 received statements from all of the clinicians it has
5 requested statements from, it has the records related to
6 his care from both Manston and the hospitals involved in
7 his treatment, it has evidence from the guards who took
8 him to hospital on 18 November, including about the
9 condition that he was in, and the Inquiry has been able
10 to obtain an expert opinion as to the potential
11 shortcomings in his care based upon all available
12 evidence.

13 It's right, as was set out in CTI's note, that the
14 Inquiry hasn't had the level of engagement that it might
15 have expected from some Medevent witnesses. For
16 example, as set out in the note, the principle of
17 Medevent wouldn't provide a single statement which
18 incorporated all of his responses to Inquiry's
19 questions. Instead these are appended to a statement.
20 However, it is nonetheless right that the statements
21 requested from Medevent have been provided. It's also
22 important to say, Chair, that whilst you can't compel
23 doctors or paramedics to provide evidence, they are both
24 subject to a distinct obligation, in each of their codes
25 of conduct, to provide cooperation in the context of

34

1 this Inquiry. You would be in a position to refer them
2 to their regulators were they, for example, not to
3 attend the hearing. That's an important lever. But
4 there is no evidence at present to suggest that any
5 witness from Medevent would do that. Witnesses from
6 Medevent cooperated with the PPO investigation and
7 provided a report to the coroner for the purposes of the
8 inquest.

9 The Inquiry made an extensive disclosure request
10 seeking materials from Medevent. In response, Medevent
11 informed the Inquiry that, in mid-January 2006, the
12 Home Office took custody of 180,000 triage forms, paper
13 medical notes and digital notes related to small boat
14 arrivals from them.

15 It's not entirely clear what period this material
16 relates to and the Inquiry has asked the Home Office to
17 check whether this material was passed on, as suggested.
18 But it is right to say that the Inquiry has not sought
19 the disclosure of the medical records of every single
20 person detained at Manston from Aeromed and Medevent.
21 That would be an extremely intrusive step in respect of
22 people who are not Inquiry Participants and require the
23 Inquiry to take custody of personal information of the
24 utmost sensitivity.

25 The Inquiry would not, for obvious reasons, embark

35

1 upon an examination of each person's medical records or
2 the treatment they received. Aside the fundamental
3 question of what this would achieve, it would be hugely
4 time-consuming. It is not necessary to do this in order
5 to be able to draw conclusions about the adequacy of
6 healthcare at Manston. There are many other sources of
7 evidence available, not least the evidence of Inquiry
8 Participants who were detained. Should any of them not
9 have medical records and want the Inquiry to ascertain
10 if they exist or make a request for the disclosure of
11 their medical records, then the Inquiry will do this.

12 The Inquiry would also caution against assuming
13 that, because documents like policies or SOPs in
14 relation to healthcare are not in the disclosure, that
15 they haven't been disclosed. They may not exist. The
16 Inquiry legal team is investigating whether
17 a considerable number of such documents related to
18 healthcare came into existence after the period
19 specified in the Inquiry's terms of reference or just
20 before it.

21 The CTI note explains that, when it received the
22 draft expert report, it wrote to Medevent and some
23 individual doctors to let them know that the report was
24 critical of aspects of Mr Ahmed's medical care in
25 Manston — not just Manston but in hospital too — and

36

1 if they were Inquiry Participants, they would have the
2 opportunity to see that draft and suggest issues or
3 documents for Dr Killingley to take into account.

4 The Inquiry legal team was conscious in this regard
5 that Medevent had only been asked to provide doctors in
6 Manston from October 2022 and, it appears on the
7 evidence, immediately had to deal with an outbreak of
8 diphtheria as well as many other challenges. No
9 application for Inquiry Participant status has been made
10 by Medevent but the Inquiry raised that with Medevent as
11 a matter of fairness to it and to some of the doctors it
12 employed.

13 As previously stated, being an Inquiry Participant
14 is advantageous to witnesses, given the access it gives
15 them to disclosure and the ability it confers on them to
16 inform the Inquiry's examination of witnesses, but it
17 doesn't have a bearing on the Inquiry's ability to
18 investigate, seek statements and disclosure from them or
19 to make criticisms of any entity.

20 The Inquiry legal team has periodically assessed
21 whether the absence of statutory powers is frustrating
22 the Inquiry's work so that it cannot fulfil its terms of
23 reference. We do so because we, as much as everyone
24 else, would wish to avoid a situation whereby at a late
25 stage it becomes a necessity. It's also extremely

37

1 mindful that converting non—statutory inquiries to
2 statutory inquiries appears to take a very long time.
3 To date the assessment has been that, whilst it's
4 frustrating and wasteful that some witnesses have not
5 been cooperative, the Inquiry is able to fulfil its
6 terms of reference as a non—statutory inquiry.

7 Having regard to the requirements of Article 2 in
8 relation to Mr Ahmed, this is because the Inquiry has
9 received the records understood to exist, because, as
10 I have set out, the witnesses who have been asked, but
11 particularly the clinical witnesses, have provided
12 statements and the Inquiry doesn't expect nor have any
13 evidence to suggest that any clinician wouldn't attend.

14 As I've set out in relation to the one guard who
15 hasn't provided a statement, because the other guards
16 have and because of the existence of other
17 contemporaneous evidence, which includes the timing
18 about when, for example, he arrived into hospital, there
19 is sufficient evidence in order for you to be able to
20 make findings on the sort of things that his evidence
21 would have gone to.

22 The guards who are being asked to give evidence are
23 being asked in part so that they can provide evidence
24 about how ill Mr Ahmed appeared to them, given, for
25 example, the issues that arise about the potential delay

38

1 in his receiving treatment, but, as stated, there are
2 a number of sources of evidence about this.

3 May I turn then to the submissions made by Inquiry
4 Participants and to the submissions about further
5 witnesses from whom statements should be taken?
6 Ms Moffatt is going to deal with the detailed
7 submissions as to why the Inquiry legal team doesn't
8 regard it as reasonably necessary to take statements
9 from a number of those specified and why it agrees with
10 some of the suggestions.

11 As foreshadowed in CTI's note, the Inquiry has made
12 almost all of the requests for statements that it seeks
13 to. This is not a hard—edged deadline but an internal
14 ambition to have completed this phase of the Inquiry's
15 work so that preparations for hearings could begin in
16 earnest. Drafting requests for and reviewing statements
17 and exhibits is one of the most time—consuming parts of
18 any Inquiry's work and this increases when requests are
19 not general but based upon underlying evidence or
20 intended to help resolve unclear facts or disputes.

21 Inquiry Participants, rightly, in the view of the
22 Inquiry legal team, urge you to convene hearings as soon
23 as possible. The Inquiry detects a consensus that this
24 might be around February 2026 [sic]. I say "consensus"
25 on the basis of what Inquiry Participants have set out

39

1 in writing.

2 It should be apparent from the Inquiry's provisional
3 witness list that this hearing may be upwards of six
4 weeks. I say that now to help legal teams begin their
5 planning. To embark, for example, on a hearing
6 in February realistically would require the
7 evidence—gathering part of the Inquiry's work to
8 substantially be coming towards its end point. This
9 would be to ensure that there was disclosure of witness
10 statements and expert reports to Inquiry participants
11 sufficiently in advance of the hearing.

12 That need to move to the next phase of work is
13 because this Inquiry, like others, will provide for an
14 evidence proposal process. The Inquiry will provide
15 Inquiry Participants with a list of topics and documents
16 which it intends to put to each witness and give them
17 the opportunity to add topics or documents before the
18 finalised evidential package is provided to each
19 witness. But that process requires the Inquiry to start
20 its part of that work in the months before the hearing
21 commences and as a rolling process. It requires the CTI
22 team to be in a position to identify most of the topics
23 and documents to be put to a witness at an early stage
24 and everyone will appreciate and understand that it's
25 a labour—intensive and pressurised exercise.

40

1 So I think the focus has to be on that process
 2 starting, as it were, in the months before a hearing,
 3 not weeks. It will be hard to do if, at the same time,
 4 the legal team is still involved in a substantial
 5 evidence—gathering and reviewing exercise. Evidence
 6 gathering will of course continue — I make that clear
 7 on behalf of the Inquiry — but it's the extent of that
 8 exercise which matters.

9 It means that the Inquiry needs to examine with real
 10 rigour the question of whether it is reasonably
 11 necessary to obtain more witness statements. This is
 12 particularly so because witness statement evidence is
 13 only one part of the evidence in any inquiry. In this
 14 Inquiry, the principal evidence about the conditions at
 15 Manston will come from those who had to endure them.

16 The observations of Mr Justice Leggatt, now
 17 Lord Leggatt, in the well-known judgments of *Gestmin* and
 18 *Blue v Ashley*, about the frailty of human memory and the
 19 importance of fact-finding based upon contemporaneous
 20 documentary evidence and known and probable facts have
 21 real resonance in an inquiry setting.

22 Contemporaneous documentary evidence is often
 23 critical in an inquiry, truly revelatory of what people
 24 knew at the time and more reliable than their memory
 25 years after the event. This appears true in this

41

1 Inquiry. The day-to-day communications between people
 2 who worked at Manston about what was happening at the
 3 site provide important detail about conditions which
 4 might otherwise have been lost over the years. The
 5 importance of this type of evidence can't be
 6 underestimated.

7 A submission made on behalf of each separately
 8 represented group of detained people is that the
 9 Inquiry's witnesses are too senior and that more
 10 evidence is required for more junior personnel than
 11 those witnesses who are giving evidence on behalf of
 12 Government departments or organisations. Some time ago,
 13 the Inquiry legal team concluded that the Inquiry did
 14 indeed need to seek statements from more junior
 15 personnel who were on site at Manston, directly involved
 16 in certain events, and who sat below witnesses giving
 17 evidence on behalf of the Home Office.

18 That prompted the Inquiry to seek statements from
 19 two specific Home Office officials. One is Mr Butler,
 20 who was the head of Manston Detention Monitoring within
 21 the Detention and Escort Services; the other is
 22 a witness from the Clandestine Operations Response Team.
 23 Between them they managed the Mitie and Interforce
 24 contracts among other aspects of their role.

25 It appeared to the Inquiry that both were in

42

1 a position to answer questions of fact, answers which
 2 were not apparent from the statements of more senior
 3 people. Mr Butler provided his statement in accordance
 4 with the Inquiry's timetable and it has helped the
 5 Inquiry understand more about specific factual issues
 6 that were unclear. The other individual, for whom the
 7 Home Office has applied for anonymity in respect of, has
 8 not provided his draft statement as yet but it is hoped
 9 that this witness will provide the same sort of
 10 assistance that Mr Butler's statement has provided.
 11 Equally, this is part of the reason why the Inquiry has
 12 asked for a statement from [redacted] of the
 13 Ministry of Defence. It's his presence on the ground
 14 that is of consequence.

15 The witnesses from MTC include the site manager, the
 16 individual to whom I've already referred, who made
 17 records about things he was concerned about, and another
 18 site manager for MTC also appears on the provisional
 19 witness list. These are both people very much involved
 20 in operational matters who dealt with conditions on site
 21 with personnel and detained people.

22 Witnesses from Mitie Care and Custody include the
 23 mobilisation project manager — this is Ms McClymont —
 24 tasked with overseeing mobilisation of their services at
 25 Manston. However, she also worked at the site during

43

1 the relevant period and, like her counterparts at MTC,
 2 also appears to have dealt daily with the challenges
 3 that arose with personnel and detained people.

4 Mr Nielson of Mitie Security is also on the
 5 provisional witness list. He is the national account
 6 manager for Mitie Security but he confirms that only one
 7 individual at the site was a direct employee of
 8 Mitie Security. Between 8 to 300 officers, depending on
 9 the requirement at a particular time, worked for
 10 Mitie Security but they weren't direct employees.

11 The Inquiry was waiting to review the first
 12 statement of Ms McClymont before determining whether
 13 there was a need to seek a statement from her then
 14 colleague, Mr Morris. A review of that statement and
 15 her exhibits is underway but I can confirm that the
 16 Inquiry will seek a statement from Mr Morris also.

17 Inquiry Participants submit too that the Inquiry
 18 ought to go further than this and seek statements from
 19 people — if I can describe them as more junior—ranking
 20 employees, so, for example, the security guards or
 21 people who worked for Interforce or immigration
 22 officials who carried out interviews. It is submitted
 23 by them that, if there is evidence of misconduct or
 24 prejudice on the part of such employees, for example,
 25 the use of racist language, then it is only by calling

44

1 them that you could address why this occurred. In other
2 words, in order to understand the culture or the ethos
3 related to the detention of people at Manston or why
4 people may have been subject to mistreatment, you have
5 to call the most junior ranks of the workforce.

6 On behalf of the Inquiry legal team, I would submit
7 that there are countervailing arguments against this and
8 that you do not need statements from these individuals
9 in order that you can come to conclusions about the
10 conditions encountered at Manston during the relevant
11 period or the treatment of those detained.

12 There are a number of reasons why. First, because
13 this is an inquiry as opposed to a trial of fact about
14 specific allegations of misconduct or mistreatment of
15 detainees. The Inquiry will not be calling specific
16 individuals, for example, to allege that they used
17 racist language. Consistent with this being an inquiry,
18 you have a broad base of evidence from which you can
19 determine if there is evidence of misconduct, if there
20 was evidence of misconduct or hostility towards
21 detainees, and critically again this includes from
22 detainees themselves. There is contemporaneous
23 documentary evidence that this occurred.

24 You will hear evidence from witnesses, like the
25 Home Office officials, who were made aware of

45

1 allegations about staff misconduct or witnesses, like
2 the MTC manager, who witnessed it themselves. There is
3 evidence of some investigations or attempts at
4 investigations and the Inquiry has sought evidence from
5 witnesses in respect of that too.

6 Insofar as Inquiry Participants suggest that only by
7 calling such witnesses might you know why such conduct
8 occurred, again there will be a range of sources from
9 which you will be able to make direct findings or draw
10 inferences about that. That might include whether what
11 personnel said or did demonstrates that they had animus
12 towards people who arrive by small boat; whether they
13 lack training to equip them for the demands of working
14 in a detention facility; whether they lacked
15 supervision; whether as conditions on the site
16 deteriorated so too did morale and the ability to retain
17 discipline; whether, as Lieutenant General Skeates
18 describes it, compassion fatigue or a process of
19 desensitisation set in; whether there was any real
20 leadership either overall at Manston or in certain
21 groups of personnel working in pockets in Manston.

22 In my respectful submission, these are the sorts of
23 questions that can be answered without evidence from
24 those potentially implicated in misconduct or from the
25 broader base of people who worked at Manston at more

46

1 junior levels.

2 In respect of public servants who worked at Manston,
3 there are questions of organisational ethos, especially,
4 it appears, in relation to the Clandestine Operations
5 Response Team. You will hear evidence about this from
6 Mr O'Mahoney. His evidence that he had significant
7 concerns around the behaviour and conduct of a small
8 number of staff working in his line management chain
9 from early on in his tenure can't be put easily to one
10 side as the evidence of someone too senior and remote to
11 really know what was happening or someone unable to
12 offer his perspective on the broader implications of the
13 concerns that he had at the time or why, apparently,
14 this misconduct wasn't detected at the time.

15 Again, you will have contemporaneous documentary
16 evidence to draw upon and we'll hear from other
17 witnesses, like Mr Smith and the witness who has sought
18 anonymity, who were part of the CORT team also.

19 There is also research in this field, including the
20 published work of Professor Bosswell in 2025, describing
21 key findings from a survey of staff culture amongst
22 private sector custodial officers employed in the
23 immigration context in 2023; the first independent
24 measure of such staff attitudes.

25 There are also some real practical issues with the

47

1 suggestion that front-line workers give evidence. This
2 is an inquiry in which you are charged with
3 investigating physical conditions and the treatment of
4 people. It is different from Brook House, which was
5 focused upon the physical mistreatment of detainees and
6 which, from filmed footage, was able to identify staff
7 involved in acts of physical violence and staff who
8 worked alongside them but, for example, who did nothing.
9 In other words, there were very specific acts and
10 specific people who could be questioned about what they
11 did or what they ignored, but that would not be the
12 position in this Inquiry. The lens here is much wider.
13 Hundreds of people from a large number of different
14 organisations worked at Manston, ranging from local
15 security guards to senior public officials. Many, as
16 has already been said, were not direct employees of
17 contractors.

18 So, in summary, in terms of what happened, you have
19 the evidence of people who were detained, you have the
20 documentary evidence, you have the evidence of other
21 witnesses able to provide evidence of what they saw or
22 did in response to allegations of misconduct, but, in
23 addition to that, there will be a number of witnesses
24 who will be asked, for example, questions about
25 leadership and what, if anything, was done to inculcate

48

1 a culture of professionalism at Manston across all of
2 those who worked there; what was done to meet the risk
3 which would pertain in any custodial setting that people
4 employed at Manston would abuse detained people; what
5 steps were taken to deal with the allegations of
6 mistreatment of detainees. The answers to these sorts
7 of questions will enable you to make direct findings or
8 to infer what the ethos or culture was that prevailed
9 within Manston, in my submission.

10 Turning then to submissions about experts and
11 specifically that the Inquiry should commission further
12 expert reports into the effects of detention on
13 children, use of force, the provision of clinical care
14 to women and children, institutional culture and racism,
15 including the submission on behalf of Bhatt Murphy
16 Inquiry Participants that this expert report ought also
17 to include expert evidence in relation to the age
18 assessments of children.

19 May I start with the legal framework and put it in
20 brief terms because there appears to be broad consensus
21 amongst Inquiry Participants about the legal framework
22 that applies to the instruction of an expert in an
23 inquiry. The touchstone is whether you will be able to
24 make findings or come to conclusions within the terms of
25 reference absent having an expert opinion on the point

49

1 identified; the test, whether a person without
2 instruction or experience in the area of knowledge or
3 human experience would be able to form a sound judgment
4 on the matter without the assistance of witnesses
5 possessing special knowledge or experience in the area.

6 You identified two areas in which you required such
7 expert assistance. These were the factors which caused
8 or contributed to Mr Ahmed's death and the configuration
9 of healthcare services at Manston and whether they were
10 adequate, both evidently matters that required
11 specialist clinical expertise in order for you to answer
12 them.

13 In this Inquiry, the terms of reference expressly
14 include, as I have already stated, that it should
15 consider no more evidence than is reasonably necessary.
16 That duty is framed in the same terms as Civil
17 Procedure Rule 35.1, that applies in civil proceedings,
18 that expert evidence in that context must be restricted
19 to what is reasonably required to resolve the
20 proceedings. It is submitted on behalf of Inquiry
21 Participants that the Article 2 and Article 3 context is
22 relevant to the question of whether it is reasonably
23 necessary to commission expert evidence. The Inquiry is
24 not aware of any authority that suggests that the test
25 as to whether an expert is required differs where

50

1 Convention rights are engaged. Additionally, in an
2 inquiry, it is still necessary to identify those issues
3 that an expert opinion is sought on and required to
4 resolve.

5 But it appears to the Inquiry legal team that this
6 can be put quite simply; that the correct approach is to
7 be clear about those issues that Articles 2 and 3 might
8 require resolution of and then to ask if expert opinion
9 is reasonably required to answer them. If it is
10 necessary in order for any issue to be resolved, then
11 such evidence should be commissioned. If it isn't
12 necessary, then the question would be: might it be of
13 assistance to you? But if it would not be, then the
14 evidence shouldn't be sought.

15 If you conclude that expert evidence isn't necessary
16 but would be of assistance to you in resolving an issue,
17 then the question becomes whether that evidence on the
18 issue is reasonably necessary in order for you to make
19 findings on those matters within the terms of reference,
20 and resolving that would permit consideration of a range
21 of factors, including, for example, impact on the
22 Inquiry timetable. I think my learned friends will know
23 and understand, for example, the sorts of periods of
24 time that the instruction of an expert and the time that
25 it takes to produce a report can entail.

51

1 Turning then to each of the areas where it is
2 submitted expert evidence should be sought. First of
3 all, the impact of detention on children. I can only
4 restate on behalf of the Inquiry that it regards the
5 detention of children in Manston as one of the most
6 significant issues that falls to be considered, given
7 its exceptionality; the fact that children were detained
8 alongside adults who were not family members in physical
9 conditions, understood to be accepted, that don't seem
10 to have met the basic needs of children; and of course
11 that children appear to have been — though it will be
12 a matter for you in due course — exposed to an
13 assortment of risks, ranging from a risk of disease to
14 safeguarding risks.

15 CTI did not intend in any way in the pre—hearing
16 note to suggest that an issue for an expert boiled down
17 to whether detention in Manston was distressing for
18 children. Rather, the note sought to elicit whether
19 there was any dispute that children who arrived in
20 Manston were likely to have experienced multiple
21 traumas; in other words, that the starting point for
22 assessment of conditions, the conditions that children
23 were held in, is that these were children who arrived
24 traumatised before their exposure to the conditions.

25 The question of what impact the conditions at

52

Manston had on them is obviously a separate question. The expert evidence already commissioned on behalf of people and detained as children is to the effect that detention per se is damaging. But you will obviously need to consider the impact that the specific conditions in Manston had on children or what risks this exposure gave rise to. Again, in my submission, the critical issue is whether an expert opinion is necessary or reasonably necessary in order for you to make those sorts of assessments or whether it is sufficiently obvious that detention would cause yet further harm to these children in those conditions or is in fact uncontroversial.

Bhatt Murphy poses the question of whether the conclusions set out in its existing expert reports are contested, suggesting that, if they aren't, then you could act on that evidence. In my submission, it would assist you to know whether the findings are accepted in whole or in part by other Inquiry Participants. If they are uncontroversial, then the Inquiry could, for example, draft a document setting out what is agreed, but if they aren't agreed and you consider that it is reasonably necessary to obtain such evidence, then I would respectfully suggest that you would have to commission an expert report rather than simply adopting

53

the contested contents of a report commissioned by one Inquiry party.

In terms of health services for women and children, we respectfully agree that it would assist to have an expert opinion on what medical care ought to have been provided to women and children, given their distinct health needs, and assessment of that against what was in fact provided. Whether, for example, the fact that children were being detained on the site required that a GP be present, as opposed to them being referred externally, for example, appears to fall within the field of clinical expertise.

The Inquiry's first port of call has been to include questions in the letter of instruction for Dr Hard going to the different health needs of women and children and how these ought to have been met in Manston. The legal team has arranged to speak to Dr Hard in greater detail to examine if these are matters he can cover, but if he cannot, we will explore whether it might be possible for him to have a co-author who would provide an opinion in relation to women or children or who might, for example, provide a short addendum report to Dr Hard's overall opinion.

I'm just checking the time. Have I got — sorry.

THE CHAIR: We tend to take the break at 11.45, but

54

I appreciate you're about to start a topic that you might not complete before the break, so if you want to adjust your time and we take a break now —

MS DOBBIN: I'll take the seven minutes and see how far I go.

THE CHAIR: Well, when you come to an appropriate moment to stop, Ms Dobbin, I'll leave it in your hands even if we slightly overrun.

MS DOBBIN: Thank you. Can I turn, then, to institutional culture and racism? Can I make absolutely plain at the outset that nothing I say is intended to minimise issues of racism or its perniciousness because, as I have already outlined, it appears to the Inquiry that there are issues to examine first in relation to the political decisions made about Manston and which, for example, resulted in a lack of accommodation to transfer people to and the toleration of people being detained unlawfully and in deteriorating conditions and whether, quite simply, that occurred because these were small boat arrivals or whether there are other justifications.

I think, as I may have stated before, the Inquiry has looked at this through the lens of small boat arrivals as opposed to any given ethnicity, given the diversity of people's backgrounds who arrived by small boats in particular in this period in 2022. According

55

to Mr Ridley's statement, approximately 27% of all small boat arrivals in 2022 were Albanian and in August 2022 they accounted for approximately 50% of the monthly arrivals. Separate issues arise having regard to the treatment of detainees by public servants and personnel from the different contractors and subcontractors, as I've already said. There is evidence that racist language was used towards detainees by some staff and that there was hostility and aggression towards detainees. Fact-finding about this and what happened to people is a matter for you.

Insofar as Inquiry Participants suggest that you ought to commission an expert on institutional racism, it is important to return to the terms of reference in this Inquiry insofar as they set out what its primary task is. I'll just repeat them briefly so that representatives don't have to look them up. But the primary task is that the Inquiry investigates and reports on the decisions, actions and circumstances which led to the conditions encountered. That's between 1 June 2022 and 22 November 2022. As you are aware, the terms of reference then specify those matters that in particular you are to focus on.

Those terms of reference are not a warrant to investigate institutional racism within the Home Office

56

more broadly or whether or to what extent the outcome of previous investigations have been acted on or why people who work in immigration detention in particular might mistreat people in their care. Broader background may be relevant. For example, there may be perfectly legitimate questions to be asked of witnesses, given what is known about the treatment of people in immigration detention, about the risks of using multiple contractors and subcontractors to guard them and what the Home Office did to meet these risks. As I've already said, Chair, it's that sort of evidence from which you may be able to make findings or draw inferences.

In the Brook House Inquiry, the Chair declined to make findings about institutional racism, setting this out in her report:

"Some Core Participants have argued that the Inquiry should conclude that there was institutional racism at Brook House during the relevant period.

"As noted in those submissions, the definition of institutional racism used by Sir William Macpherson in the Stephen Lawrence Inquiry was ..."

And she then sets out the definition, which was also set out in CTI's note.

She went on to say:

57

"The context of this Inquiry — the treatment of foreign nationals while in immigration detention — makes it inevitable that issues of racism will arise. As set out above, I have found considerable evidence of racist beliefs and abuse by staff at Brook House. However, the Terms of Reference do not instruct me to investigate the issue of institutional racism, and to do so would have required a much broader investigation that would have strayed from the Inquiry's core focus. As a result, I do not have sufficient evidence from which to reach a conclusion on whether institutional racism was present at Brook House. However, I have found that Brook House appears to have been a breeding ground for racist views in the relevant period and was perceived as an acceptable environment in which to express them."

I note, Chair, that the terms for the Brook House Inquiry were framed in similar ones to the terms in this Inquiry. The Chair in that Inquiry did have experts, professor Bosworth, expert on organisations, to whom I've referred, Mr Collier, an expert in the use of force, and Dr Hard, who is an expert in this Inquiry too, as opposed to a distinct expert on institutional racism. The Chair in that Inquiry didn't sit with an assessor but that, self-evidently, didn't inhibit her ability to reach those stark conclusions.

58

You have accepted, similar to the approach of the Chair in the Brook House Inquiry, that issues of institutional ethos arise in this Inquiry and are capable of being looked at within the terms of reference and within the framework of the existing list of issues. I can say that the Inquiry legal team are very aware of the need to investigate evidence that people in Manston were treated as they were because of their background and their status.

It is well understood that expertise on racism or other forms of discrimination may be helpful in particular where there is concern that discrimination has gone under the radar, where there are, for example, policies or practices seemingly neutral but which produce discriminatory effects or treatment or which authorities seek to objectively justify. There is a question as to whether what happened in Manston really falls into this sort of Inquiry — sorry, into this sort of category or whether the issues are much more clear-cut. There is evidence of some personnel using the racist or callous sort of language, leading to things being said like, "You chose to come here". This appears, on its face, to raise systemic issues which, as I've already noted, will be put to witnesses and you will have the opportunity to consider the broader

59

questions this gives rise to.

As noted, understanding what the response was to these sorts of concerns, what sort of steps were taken to reduce the risks to detained people, will enable you to understand more about the organisational ethos within Manston. By the same token, the examination of why ministers and senior officials may have tolerated Manston operating on an unlawful basis, tolerated people living in the conditions that came to pass or tolerated children living in those conditions may provide you with very valuable evidence upon which to assess ethos and leadership. Again, I just come back to the simple point that the issue for you is whether investigating these sorts of issues necessitates an expert or would otherwise be helpful to you.

I'm very conscious of the time, so I'll finish just on this.

I think that some Inquiry Participants are also suggesting that you ought to consider appointing an assessor to sit with you and they do so by analogy with section 114(7) of the Equality Act, which applies a presumption that, where claims are being heard in the county court for unlawful discrimination, that a judge will sit with an assessor.

An assessor's role is to assist with the evaluation

60

1 of evidence in a discrimination claim, for example, in
 2 evaluating objective justifications put forward for
 3 conduct alleged to be discrimination. But, again, as
 4 I have set out, where much of what the Inquiry is
 5 investigating is overt, it may well not be the sort of
 6 evidence that you would have difficulty in evaluating or
 7 unpicking, but that is a matter for you.

8 Chair, perhaps if I leave it there. I only have
 9 a few more minutes, I think, to go after this break.

10 THE CHAIR: Thank you, Ms Dobbin. We'll take a comfort
 11 break now but can I ask that all attendees are back in
 12 the hearing room in ten minutes, please? Thank you.

13 (11.47 am)

14 (A short break)

15 (11.59 am)

16 THE CHAIR: Thank you, everyone, for being ready to start
 17 again.

18 Ms Dobbin.

19 MS DOBBIN: Chair, I think I have about ten minutes and some
 20 ground to cover. Can I just start with the suggestion
 21 that you ought to appoint a use of force expert.
 22 Witnesses who were detained in Manston have provided
 23 evidence in their draft statements that force was used
 24 on them. By way of example, these include allegations
 25 of children being physically dragged inside, some

61

1 allegations of being restrained, being pushed, an
 2 allegation of being punched, being kicked, for example,
 3 in order to wake up. I say this without in any way
 4 minimising that: these sorts of examples speak to casual
 5 uses of violence rather than uses of force which may or
 6 may not be justified, having regard to the legal context
 7 within which force is used; I mean, for example, that in
 8 some contexts, as you well know, when the police are
 9 called to justify the use of particular restraint
 10 techniques or the force that was used in a specific
 11 context.

12 As I have alluded to, the handcuffing of Mr Ahmed
 13 when he was in hospital and until just a few hours
 14 before he died is a matter of concern and begs the
 15 obvious question of whether people who were detained in
 16 Manston were just handcuffed as a matter of course if
 17 they left the site. It obviously raises more issues
 18 than that. The Inquiry has the risk assessment for the
 19 escort of Mr Ahmed to hospital and Mitie witnesses will
 20 be asked questions about this and questions about
 21 underlying policy and training.

22 Standing back from the evidence, it seems that there
 23 are different strands to the use of force. First, there
 24 is the broad legal framework. Immigration officers and
 25 detention custody officers have statutory powers to use

62

1 force. An immigration officer has those under
 2 section 146 of the Immigration and Asylum Act. Detainee
 3 custody officers are also provided with a number of
 4 powers and provision is also made that they may use
 5 reasonable force where necessary in carrying out those
 6 enumerated powers. Those include, for example, powers
 7 of search and to ensure good order. But the Inquiry has
 8 noted references in the underlying material on the lack
 9 of equivalent powers on the part of other personnel who
 10 were not DCOs or immigration officers and who could only
 11 have used force under the common law.

12 So it first appears to the Inquiry that that raises
 13 a systemic issue, for example — or a number of systemic
 14 issues: so, for example, how was the use of force by
 15 personnel not authorised to use force by statute
 16 supervised, that kind of issue; second, it appears that
 17 different contractors had different policies and
 18 standard operating procedures on the use of force as
 19 well.

20 There's the overall question about how the use of
 21 force was monitored. So, for example, if force was used
 22 on someone, were they given a medical check afterwards?
 23 What was the process if an individual complained about
 24 force used on them? Then there are linked issues, like
 25 the use of violence for the segregation of people as

63

1 well. But this is not an inquiry specifically into the
 2 use of force on people on occasions, as was the position
 3 in Brook House. It forms one of the very many aspects
 4 of some people's detention and, as has already been set
 5 out in writing, the Inquiry is unlikely to investigate
 6 specific incidents of the use of force.

7 So the Inquiry legal team is collating evidence in
 8 order to be able to provide you with the basis upon
 9 which you can draw broad conclusions about the use of
 10 force, so, for example, so that you can consider
 11 evidence that force was used inappropriately; whether
 12 the Home Office understood the risk that detainees would
 13 be exposed to inappropriate force; the steps taken to
 14 mitigate that risk; what the processes were when force
 15 was used and whether they were adhered to. These are
 16 systemic issues rather than the narrower sorts of
 17 questions that might be put to use of force experts when
 18 they're asked, for example, to look at footage of
 19 restraints and uses of physical force to determine
 20 whether it's in keeping with guidance and so forth.

21 I set those matters out shortly because, again, the
 22 issue quite simply for you is whether you think you need
 23 expert evidence in order to make findings on those sorts
 24 of issues or, again, whether you think it might be of
 25 assistance to you.

64

1 Chair, there are some other discrete issues that
 2 have been raised in the submissions by my learned
 3 friends which I thought it might assist if I touched on
 4 briefly. They include, first, the pixellation of
 5 footage. Can I say that I think it's important that
 6 Inquiry Participants view the footage when it's
 7 disclosed because it may be more limited than is
 8 expected. By way of background and to dispel any
 9 concerns that this footage has just come to light,
 10 first, the Inquiry understands that there were no CCTV
 11 cameras at Manston at the time and that those staff who
 12 wore body-worn cameras did not have them on at all
 13 times.
 14 Following receipt of Mitie's disclosure on 27 April,
 15 the Inquiry specifically requested and asked if there
 16 was body-worn footage in respect of detention officers
 17 who interacted with Mr Ahmed. Mitie's legal
 18 representatives, who are Kennedys, indicated that they
 19 did not have that specific footage but they had obtained
 20 109 body-worn footage clips for the relevant periods.
 21 Kennedys informed the Inquiry that they had reviewed
 22 this footage and that Mr Ahmed didn't feature in it. It
 23 was explained that body-worn cameras were switched on
 24 for specific reasons, for example, when force was used.
 25 Kennedys disclosed the clips to the Inquiry and the

65

1 Inquiry has followed this up with questions about the
 2 use of cameras, for example, when escorting detainees to
 3 medics. Kennedys have confirmed that there isn't
 4 further footage available for the relevant period and
 5 obviously the Inquiry is reviewing those clips.
 6 Kent Police have provided 23 video files and
 7 body-worn footage as well, which is being reviewed, and
 8 without going into the details of everyone who has
 9 provided it, there are some from MTC. The Inquiry has
 10 made requests of ITN and ITV. The Home Office has
 11 provided three video files and, to be clear, on
 12 1 April 2025 the Inquiry specifically checked with the
 13 Home Office whether there would be disclosure of any
 14 video — CCTV video footage or whether any such footage
 15 had been destroyed, and the Home Office confirmed that
 16 they had one video embedded in a PowerPoint
 17 presentation, repeating that there hadn't been any CCTV
 18 on the site in 2022.
 19 Can I very briefly touch on pixellation then, and
 20 again I think that might be a point my learned friends
 21 want to return to when they've seen the footage. But at
 22 present the Inquiry has pixellated the faces and
 23 identifying features of everyone in the footage,
 24 including staff, and that includes public servants as
 25 well. The Inquiry has done this on the basis that it

66

1 isn't relevant or necessary to see someone's face to
 2 understand what is happening in the videos because they
 3 speak for themselves and because of concerns about
 4 revealing people's physical identity without them having
 5 an opportunity to make representations about that and
 6 that that would slow down disclosure to Inquiry
 7 Participants.

8 The Inquiry's general policy is where there are
 9 allegations about people not in the public domain and
 10 there aren't findings of guilt or misconduct, that the
 11 Inquiry will give them a cipher. If there were
 12 arguments that people's faces ought to be revealed in
 13 the footage because of their conduct, then they would
 14 need to be allowed to make some representations about
 15 that.

16 So, Chair, I hope that at least dispels any concerns
 17 and indicates that any issues about pixellation can be
 18 picked up.

19 Can I turn then to the undertaking, which I know is
 20 a pressing issue. The Inquiry has received, as I've set
 21 out, a number of draft statements from Inquiry
 22 Participants who were detained people but it's received
 23 few finalised versions of them. We're really grateful
 24 to the people who've provided the statements and for the
 25 work that has gone into them but we're conscious that

67

1 the Inquiry hasn't received draft statements from
 2 a significant number of witnesses who were detained.

3 It is understood that a lack of an undertaking means
 4 that Inquiry Participants are concerned about the
 5 Inquiry providing disclosure of their statements to
 6 other Inquiry Participants, but this is of concern to
 7 the Inquiry because it means that the Inquiry still
 8 doesn't know whether, for example, the Home Office might
 9 contest or object to any of that evidence and, if so,
 10 how the Inquiry legal team could ensure that you were
 11 equipped to deal with disputes and, for obvious reason,
 12 that's of increasing urgency as we move towards
 13 hearings.

14 The Inquiry is in a difficult position. The request
 15 for the undertaking wasn't made until June but the
 16 Inquiry acted quickly in seeking submissions, as it had
 17 to, and making the request to the Home Office that the
 18 undertaking be given and communicated the urgency of the
 19 request. The Inquiry has contacted the Home Office on
 20 a number of occasions since July and had a meeting with
 21 officials before the hearing. The latest update is that
 22 Home Office officials and ministers are currently
 23 considering the request for an undertaking and that they
 24 will report progress back to the Inquiry team as soon as
 25 possible.

68

1 I simply say that the absence of an undertaking does
2 not prevent the provision of draft statements to the
3 Inquiry and there's also a pressing need for this
4 because it will enable the Inquiry to identify which
5 witnesses to call from people detained at Manston. The
6 Inquiry can only do that when it has all of the
7 statements.

8 The Inquiry wanted to make it plain to detained
9 people its willingness to consider special measures that
10 might assist them giving oral evidence and in particular
11 that would assist them to give evidence in a hearing.
12 It recognised that the nature of the evidence that
13 people who were detained might want to give could mean
14 that they needed additional support. However, the CTI
15 notes set out that we recognise that witnesses from
16 other organisations might need support to give evidence
17 too and sought consensus on some general propositions;
18 for example, would Inquiry Participants generally be in
19 favour of an approach whereby witnesses with specific
20 needs or vulnerabilities would be examined only by CTI.
21 IPs were asked to notify the Inquiry if they objected to
22 this general approach but none have. More measures have
23 been suggested in submissions, but the Inquiry legal
24 team has taken the view that there's probably limited
25 utility in making more submissions about that in this

69

1 hearing and for witnesses who haven't yet been
2 identified and whose specific needs have not yet been
3 identified.

4 It is absolutely agreed that special measures can't
5 be left until the last minute and ought to be part of
6 a formal process. We propose that, when it's decided
7 who should be on the witness list, that they're notified
8 and asked to make their application for special measures
9 and that the Inquiry will respond to that within a fixed
10 timetable. So, Chair, I make it clear that we have set
11 out the range of measures that will be under
12 consideration and additional ones can be sought on
13 behalf of people as their needs dictate.

14 Chair, I'm grateful. I'm sorry, that's gone on for
15 a little while, but I'll hand over to Ms Moffatt now so
16 that she can address some of the specific matters.
17 Unless there's anything I can assist you with for the
18 moment?

19 THE CHAIR: No, other than to say there's absolutely no need
20 to apologise. I'm very grateful to you, Ms Dobbin
21 King's Counsel, for the way you've set out those
22 matters. I'm very grateful to you.

23 MS DOBBIN: Thank you.

24 THE CHAIR: Ms Moffatt.

25

70

Submissions by MS MOFFATT

2 MS MOFFATT: Chair, with thanks to Ms Dobbin, I will address
3 the following three topics: first, further witness
4 statement requests, second, the provisional witness list
5 and, third, gaps in disclosure.

6 Turning then to the first of those matters,
7 additional witness statement requests. Ms Dobbin has
8 covered the Inquiry's position on obtaining witness
9 statements from more junior members of personnel at
10 Manston. In what follows, Chair, I will address the
11 remaining eight broad categories of person for whom
12 a witness statement is proposed. First, the
13 Prime Minister's. The Right Honourable Boris Johnson
14 was Prime Minister until 6 September 2022 but in
15 a caretaker role from his resignation on 7 July 2022.
16 The Inquiry understands that there was little political
17 decision-making during this period. The Right
18 Honourable Rishi Sunak MP was Chancellor until
19 5 July 2022 and then Prime Minister from
20 25 October 2022.

21 Those acting for the people formerly detained at
22 Manston have pointed in particular to Boris Johnson's
23 direct involvement in leading the Government's wider
24 policies on illegal migration, including establishing
25 military primacy in the Channel through

71

1 Operation Isotope, the Migration and Economic
2 Development Partnership with Rwanda and ending the use
3 of asylum hotels.

4 As for Rishi Sunak, who was in post when the
5 conditions at Manston had deteriorated, the Inquiry
6 understands that he did have some direct involvement in
7 decision-making about Manston in November 2022, in
8 particular around creating a non-detained area of the
9 site. However, this was a proposal that originated with
10 the Home Office and which ultimately was not enacted.

11 Chair, it is highly likely that you'll want to keep
12 the position of the two Prime Ministers under review.
13 The Inquiry is continuing to investigate any role they
14 played, the significance of any decision-making and any
15 impact of the wider policies around illegal migration at
16 Manston. However, it's important to recognise that the
17 illegal migration policy framework was far broader than
18 Manston and that decisions taken at a high level on
19 those wider policies may not have had any relevant
20 impact on Manston itself, whose role was focused on the
21 swift initial processing of those arriving by small
22 boat. It may be, therefore, that in both cases those
23 best placed to explain decision-making on Manston are
24 the Home Secretaries and the senior officials in post at
25 that time.

72

1 Additionally, the Inquiry has either sent or is due
2 to send witness statement requests to key Cabinet Office
3 ministers and officials, including the former Cabinet
4 Secretary, the Right Honourable Lord Case. Their
5 evidence may assist in illuminating whether either
6 Prime Minister had any appreciable role in
7 decision-making over Manston. This, Chair, will be kept
8 under review.

9 Second, those representing the formerly detained
10 people have also proposed two former ministers who were
11 in post as the Chancellor of the Duchy of Lancaster or
12 CDL from 6 September to 25 October 2022, in the case of
13 the Right Honourable Nadhim Zahawi, and from 25 October
14 2022, in the case of the Right Honourable Sir
15 Oliver Dowden MP. The Inquiry has already sent witness
16 statement requests of two former CDLs, the Right
17 Honourable Kit Malthouse MP and the Right Honourable
18 Steve Barclay MP, who were in post prior to
19 6 September 2022.

20 The Inquiry's consideration of documentary evidence
21 to date suggests that the involvement of CDL had reduced
22 significantly by September 2022 compared with earlier
23 that year and in particular when the Illegal Migration
24 Task Force was operational. To the extent that it is
25 suggested that these witnesses ought to be called to

73

1 ascertain if they knew that people were being held in
2 breach of 24 hours, the Inquiry understands it to be
3 uncontroversial that this was known about by other
4 ministers with a stake in Manston, but the Inquiry will
5 check the underlying evidence on this.

6 Chair, again, you may consider that you will want to
7 keep the position of whether to obtain witness
8 statements from these two former ministers under review
9 and reconsider them once the Inquiry has obtained the
10 further statements from the Cabinet Office witnesses.

11 Third, senior officials within His Majesty's
12 Treasury to address funding arrangements for Manston and
13 the Prime Minister's Office to understand the extent of
14 Number 10's involvement in Manston. The Inquiry's
15 consideration of the evidence to date does not suggest
16 that funding or budget was a central factor in
17 decision-making at Manston. Whereas the
18 Operation Isotrope budget was less than had been bid
19 for, much of the proposed expenditure was at sea. In
20 the light of this, Chair, it might assist you to hear
21 more from those acting for the people formerly detained
22 at Manston as to what they considered to be the
23 relevance of the funding package for the events that the
24 Inquiry is investigating.

25 As for an official from the Prime Minister's Office,

74

1 Chair, you may consider that there is already sufficient
2 evidence, including documentary material, of the policy
3 directions set by Number 10 on illegal migration in
4 2022. You might consider that such a witness would add
5 little, particularly if not involved in decision-making
6 themselves. Again, this is a matter which you may wish
7 to keep under review, pending receipt of the
8 Cabinet Office witness statements.

9 Fourth, the next broad category of requests relates
10 to various Home Office officials as well as
11 Priti Patel's special adviser, Hannah Guerin. In
12 relation to Ms Guerin, those acting for the formerly
13 detained at Manston say that she fed into key
14 decision-making about Manston and that the Inquiry
15 should consider the roles of special advisers more
16 generally in decision-making.

17 Chair, while you may take the view that the role of
18 special advisers is not generally a key theme in this
19 Inquiry, you may consider that the Inquiry should obtain
20 evidence from this potential witness, in particular in
21 relation to her involvement in Priti Patel's decision
22 around the pause on the procurement of hotel spaces in
23 late June and July 2022.

24 Chair, in relation to the other Home Office
25 officials specifically mentioned, you will be aware that

75

1 the Inquiry has either received or requested statements
2 from a number of officials who worked within, among
3 others, the immigration, enforcement and asylum and
4 protection divisions of the Home Office. You may
5 consider that the matters on which evidence is sought
6 can be or has been covered sufficiently by these
7 witnesses, but this is something you may wish to keep
8 under review while the outstanding statements from
9 Home Office officials are received by the Inquiry.

10 Fifth, as to obstacles facing detainees accessing
11 legal advice at Manston, the Inquiry recognises that
12 there is limited evidence currently before it on this
13 matter. As such you may consider, Chair, that the
14 Inquiry should request evidence from what is understood
15 to be one of the few or indeed the only lawyer who
16 arranged legal representation for a person detained at
17 Manston, including conducting legal visits to Manston.
18 Conversely, you may take the view, Chair, that obtaining
19 evidence from those who did not represent any detainees
20 at Manston, such as the former director of bail for
21 immigration detainees, would be unable to add materially
22 to the evidence. It might assist you to hear from those
23 representing the formerly detained persons as to whether
24 there are any reasons beyond those contained in the
25 written submissions as to why such evidence would be

76

1 significant to the Inquiry's investigation .
 2 Sixth, the author of the British Red Cross' letter
 3 of 13 October 2022. Chair, you'll be aware that the
 4 Inquiry has obtained a statement from the head of
 5 refugee support at the British Red Cross which sets out
 6 in detail the role of that organisation at Western Jet
 7 Foil and Manston and includes a detailed summary of the
 8 escalation of the British Red Cross' concerns, including
 9 that formal letter sent on 13 October and the actions
 10 taken before and afterwards. In these circumstances,
 11 Chair, you may consider it is not unlikely that
 12 obtaining additional evidence from the author of that
 13 specific letter would add materially to the evidence as
 14 it stands. Again, it may assist you to hear further
 15 from those representing the formerly detained people on
 16 this point.
 17 Seventh, in relation to the age assessment processes
 18 that took place at Western Jet Foil and Manston, this is
 19 another area on which you may consider that it would be
 20 beneficial to obtain a further witness statement. The
 21 statement of the head of the National Asylum Intake Unit
 22 within the Home Office discusses the processes for age
 23 assessment at Western Jet Foil and the Kent Intake Unit,
 24 including the policy changes in January 2022, under
 25 which age assessments were completed by Home Office

77

1 officials rather than contracted social workers. You
 2 may consider that there is a need of further evidence
 3 from someone overseeing those processes on the ground,
 4 such as a social work manager or someone similarly
 5 positioned to comment on matters arising in practice.
 6 Eighth, the UKHSA. The Inquiry is obtaining
 7 a witness statement from Dr Shona Arora from the UKHSA,
 8 which is in the process of being finalised and will be
 9 then disclosed to Inquiry Participants. Chair, you may
 10 consider that Dr Arora's statement covers the matters
 11 raised by those representing the formerly detained
 12 people. This can be kept under review as Dr Arora's
 13 statement is finalised .
 14 Finally on the topic of witness statement requests,
 15 Chair, as you will have seen, the Ministry of Defence
 16 have written — have submitted written submissions in
 17 respect of two witnesses from whom the Inquiry intends
 18 to obtain witness statements: Commodore John Craig and
 19 [redacted]. The substance of those
 20 submissions is that obtaining witness statements from
 21 these individuals is unlikely materially to assist the
 22 Inquiry in fulfilling its terms of reference.
 23 The Inquiry legal team does not accept that there is
 24 no value in obtaining these statements. First,
 25 Commodore Craig. He established and led the

78

1 multi—agency task force under Operation Isotrope
 2 from January to August 2022. He was then succeeded by
 3 Commodore Ingham, who has provided a statement to the
 4 Inquiry. Investigating the MoD's involvement,
 5 perspective and decision—making immediately prior to and
 6 during the first three months of the relevant period is
 7 significant. There is evidence that concerns relating
 8 to, amongst others, resourcing throughput and prolonged
 9 periods of detention were identified by military
 10 personnel at an early stage. As the joint inter—agency
 11 task force commander during this period, Commodore Craig
 12 is best placed to speak to these matters.
 13 Second, [redacted]. He was the head of the
 14 Manston cell for Operation Isotrope. He had a regular
 15 day—to—day presence on the ground at Manston, which
 16 cannot be said for any of the current MoD witnesses,
 17 whose evidence is given either solely or predominantly
 18 from a position of receiving reporting about the
 19 conditions on the grounds rather than from their own
 20 experience. It is particularly important, therefore,
 21 for the Inquiry to obtain evidence from someone such as
 22 [redacted], who can speak to the conditions and
 23 decisions made on the ground from an MoD perspective.
 24 Turning now to the question of witnesses who may be
 25 called to give oral evidence at the Inquiry's

79

1 substantive hearings. The Inquiry is grateful for the
 2 comments and proposals made by the detained people
 3 Inquiry Participants on the Inquiry's provisional
 4 witness list. As was made clear in Counsel to the
 5 Inquiry's note, the list remains under review and the
 6 evidence—gathering process is ongoing. In due course,
 7 it may be that the Inquiry concludes that the evidence
 8 of some witnesses whose names appeared on the
 9 provisional list is duplicative or uncontroversial or
 10 that another witness may be able to cover specific
 11 issues better. Equally, it is likely to be the case
 12 that further names are added. The provisional list did
 13 not include those people whose statements had not yet
 14 been received by the Inquiry. This is the case for
 15 David Neal, the former Chief Inspector of Borders and
 16 Immigration, for example, whose witness evidence is
 17 highly likely to be significant for the Inquiry.
 18 It goes without saying that, in considering who will
 19 be called to give oral evidence, the Inquiry will need
 20 to review the outstanding statements it is due to
 21 receive and any others arising from any additional
 22 requests made following this hearing. When considering
 23 the question of further witnesses to be called to give
 24 oral evidence, you may consider, Chair, that hearing
 25 oral evidence from officials from whom the Inquiry has

80

1 sought statements who were present on the ground at
 2 Manston will be particularly important in a context
 3 where, as pointed out by the firms acting for the
 4 formerly detained people, the majority of those on the
 5 current provisional witness list did not have
 6 a day-to-day presence working at Manston.

7 Additionally, Chair, you may consider that it will
 8 be important to hear from further Home Office witnesses
 9 whose statements the Inquiry already holds. These may
 10 include Emma Churchill, the Director General for
 11 Migration and Borders, who had a significant role in the
 12 Cross-Government Illegal Migration Task Force;
 13 Abigail Tierney, who took over from Emma Haddad as
 14 Director General of Asylum and Protection towards the
 15 end of the Inquiry's period and whose additional role of
 16 ethical champion engaged questions about Manston; or
 17 from Stephen Kershaw, who was the original senior
 18 responsible officer for Manston and from whom
 19 Dan O'Mahoney took over in February 2022.

20 There are no detained people currently on that list
 21 and, as set out by Ms Dobbin, Chair, the Inquiry will be
 22 able to consider the question of which detained
 23 witnesses to call to give oral evidence when it has
 24 received their statements. The views of the firms
 25 representing them as to who may be suitable to give

81

1 evidence will be taken into account at this point.

2 Chair, in short, it's premature currently for you to
 3 make any final decisions on the witnesses to be called
 4 to give evidence. The Inquiry will circulate a further
 5 provisional witness list later in 2026 and invite
 6 further submissions from Inquiry Participants at that
 7 point.

8 Turning finally to the related topic of outstanding
 9 disclosure, Ms Dobbin has provided an update on the
 10 balance of outstanding outward disclosure. What I will
 11 cover in the final few minutes is the more limited but
 12 nonetheless important topic of potential gaps in the
 13 disclosure and missing documents. This has been raised
 14 by several of the firms representing the formerly
 15 detained people and, while acknowledging the possibility
 16 that what appears to be missing may in fact be held by
 17 the Inquiry in the documents that remain undisclosed,
 18 the firms explain that they have no way of knowing
 19 whether or not this is the case currently.

20 In their joint submissions, DPG and Duncan Lewis
 21 have proposed providing the Inquiry with periodic
 22 schedules of documents that they believe may be missing.
 23 Additionally Bhatt Murphy have raised specific documents
 24 in their submissions. The Inquiry legal team will
 25 review these and any other specific queries around

82

1 missing documents and respond individually to any
 2 Inquiry Participants who raise them.

3 Separately, the Inquiry legal team has identified
 4 material which appears to be missing from the inward
 5 disclosure that it has received and a request has been
 6 made of the Home Office in respect of this material.
 7 Any additional material disclosed as a result of further
 8 discrete and targeted disclosure requests will undergo
 9 the usual review processes and will be disclosed to
 10 Inquiry Participants in due course. The Inquiry will
 11 continue to review the material it holds and will
 12 continue to raise any gaps with the relevant material
 13 providers insofar as these are identified.

14 Chair, I am conscious of the time and the need for
 15 you to hear from my learned friends, the first of whom
 16 is Ms Dubinsky KC on behalf of the detained people IPs,
 17 represented by Duncan Lewis.

18 THE CHAIR: Thank you, Ms Moffatt.

19 Ms Dubinsky, can I firstly thank those that you
 20 represent for the joint submissions and I think you're
 21 going to take us to lunch in advancing the oral
 22 submissions you wish to make.

23 MS DUBINSKY: That's correct, Chair.

24 Submissions by MS DUBINSKY

25 MS DUBINSKY: I shall be making oral submissions on behalf

83

1 of the Duncan Lewis Inquiry Participants, "DLIPs" for
 2 short, and Mr Nicholls will be doing so on behalf of the
 3 Deighton Pierce Glynn Inquiry Participants, "DPGIPs" for
 4 short. As concerns generic issues, that is issues which
 5 affect both Participants similarly, we have divided
 6 topics for all submissions between ourselves as follows:
 7 I shall address you concerning the undertaking,
 8 concerning further named witnesses from whom we invite
 9 the Inquiry to seek statements; the test for obtaining
 10 expert evidence; and a proposal of expert evidence to
 11 address the developmental and psychological impact of
 12 detention at Manston upon children. Mr Nicholls will
 13 then address you concerning the provisional witness
 14 list, outstanding disclosure, special measures, the need
 15 for a use of force expert, the film, and the interplay
 16 between the Inquiry and the prosecution.

17 So the agreed understanding for the purpose of this
 18 hearing only is that, as concerns generic issues, the
 19 oral submissions I make for the DLIPs are endorsed by
 20 DPG and the oral submissions from Mr Nicholls for DPG
 21 are endorsed by DL, but we are each speaking on behalf
 22 of our respective cohorts.

23 After going through my share of the generic issues,
 24 I shall address readiness and timing as concerns the DL
 25 cohort.

84

1 Could I start first, though, by thanking the Inquiry
2 for its intensive and meticulous work, the huge
3 behind-the-scenes work, as Ms Dobbin KC rightly pointed
4 out in representing the Inquiry, and for its flexibility
5 and care in addressing the concerns of the detained
6 persons Inquiry Participants, who I hope I'll be
7 forgiven for referring to collectively together as
8 "DPIPs" for short.

9 DPIPs have been deeply concerned by what will be
10 a lapse of over four years between the events to be
11 investigated and the start of the Inquiry, but that
12 delay is no fault of the Inquiry team's. On the subject
13 of delay, may I briefly highlight a few points? First
14 of all, of course the Home Office has delayed over three
15 months in stating its position concerning an undertaking
16 sought on 4 June. The undertaking sought is precisely
17 that already given by the Home Office in the Brook House
18 Inquiry and there is no good reason why the Home Office
19 cannot reach a speedy decision or why the undertaking
20 has yet to be granted.

21 The delay in supplying that undertaking has had
22 significant consequences for the ability and willingness
23 of DPIPs to take key steps in progressing their evidence
24 and participation in the Inquiry. I shall come later to
25 the specific issue of impact upon the DL DPIPs. In

85

1 addition, as CTI rightly note, there have been serial
2 late applications for redactions by state participants,
3 in turn delaying disclosure. There have, as CTI's note
4 also points out, been prolonged periods of disengagement
5 by potentially key witnesses, such as Mr Jenrick, and
6 I would observe respectfully that it's very troubling
7 that neither state or contractor Inquiry Participants
8 have condescended to more than the most cursory written
9 submissions for this preliminary hearing, if that, and
10 that none have sought to make oral submissions today.
11 This should not set a pattern of casual disengagement by
12 state and contractor IPs.

13 I turn now to issue A at paragraph 4 of CTI's very
14 helpful note and specific further individuals from whom
15 we say that statements should be sought. The DPIP legal
16 teams, all of us, have collectively prepared an annex to
17 our written submissions, annex A, which sets out
18 proposed specific individuals to be approached for
19 statements. May I ask you, Chair, to turn up that annex
20 now? So it's annex A, certainly to our joint
21 submissions, and I expect you may have received it
22 several times.

23 I shall now address you, by agreement with the other
24 teams, on rows 1 to 4, 6 to 7 and 14. The first two
25 rows are the two principal Prime Ministers in place

86

1 during the relevant period and their evidence is, we
2 say, indispensable, and that is clear now, we say, in
3 order rigorously and fairly to investigate a range of
4 issues, in particular issue 13 — this is on the list of
5 issues — namely responsibility and accountability;
6 issue 18, any impediment which existed in accommodating
7 people; issue 29, responsibility and accountability for
8 the conditions at Manston; issue 53, leadership.

9 While Ms Moffatt emphasises the high-level nature in
10 particular of Mr Johnson's policy involvement, he did in
11 fact have direct involvement with Manston in the
12 following sense or at least vital involvement. Manston
13 was considered as a reception centre for small boats in
14 response to an urgent request from Number 10, then
15 Mr Johnson. That's Mr Ridley's statement,
16 paragraph 163. The decisions of both these former
17 Prime Ministers, in particular concerning funding of
18 accommodation in the community — and I would point out
19 here that this also goes to the question of why do we
20 need Treasury, which I will come back to — but the
21 decisions of both Prime Ministers in particular
22 concerning whether accommodation should be sourced from
23 hotels in order urgently to house small boat arrivals
24 bore upon the gross overcrowding that developed at
25 Manston.

87

1 Now, multiple witnesses, for example, Ms Braverman,
2 paragraph 131, Ms Porter, paragraph 103, state that the
3 decision to pause sourcing hotel accommodation for
4 asylum seekers was principally responsible for the
5 overcrowding that ensued at Manston. Dame Priti Patel
6 indicates that her decision to pause sourcing hotel
7 accommodation was in line with the position of the
8 Prime Minister, then Mr Johnson. This is
9 Dame Priti Patel, paragraphs 58 and 184.

10 There's also a recurrent indication that
11 Mr Johnson's announcement on 7 July 2022 of his
12 resignation and the upheaval in Government that both
13 preceded and followed that date distracted from the need
14 urgently to resolve the unfolding crisis and widespread
15 illegality at Manston. That can be seen, for example,
16 in the Patel statement, paragraphs 190 to 191 and 239
17 and 243; Jenrick, paragraphs 12 and 15. The Inquiry
18 will need to understand the extent, timing and impact of
19 that distraction, points upon which Mr Johnson and then
20 Mr Sunak are particularly well placed to shed light.

21 Turning to Mr Sunak, Ms Braverman's statement
22 indicates that Mr Sunak was closely involved in the
23 development of an undetained site at Manston, although,
24 as Ms Moffatt rightly points out, that never came to
25 fruition. But the statements of Ms Patel and Mr Jenrick

88

moreover both indicate that Mr Sunak withdrew support from using RAF Linton as an alternative accommodation centre and both indicate that would have relieved pressure at Manston. But, importantly, also Mr Sunak played a key role in relevant decision-making in relation to the option of bailing detainees from Manston to no fixed abode. It is not the case that he was standing back and allowing decisions to be taken by the Home Secretary alone. Ms Braverman's statement records that his response to that proposal on 11 November 2022, the height of the crisis, was a firm "No". Those are her words. It's paragraphs 120 and 123.

Mr Sunak was, in addition, Chancellor of the Exchequer until 5 July 2022 and the question of the adequacy of funding for onward accommodation or indeed for staffing and facility at Manston itself will clearly form part of the issues I have already outlined. There is currently no ministerial level from the Treasury as to those funding decisions and nor, other than a brief statement from Conrad Smewing, a civil servant, do we have any evidence from the Treasury at all.

For those reasons, we do say that it's impossible properly to address the issues I've already enumerated without the evidence of Mr Johnson and Mr Sunak. The absence of individuals with whom ultimate responsibility

89

potentially lies is particularly concerning in the present Inquiry, which is required to discharge the investigative duty under Article 3. As Lord Justice Elias observed in the case of *AM v Secretary of State*, the minimum requirements of an Article 3 compliant investigation include that this, and I quote:

"... should be effective in the sense that it is thorough and capable of leading to the identification of those responsible for any Article 3 breaches [as read]."

I turn now to row 3 in this annex, for those who have it open, and this is Simon Clarke, Chief Secretary of the Treasury. I have already highlighted the dearth of evidence from the Treasury department and we are asked by my learned friend Ms Moffatt to explain why Treasury decisions would have had an impact. The answer is that there are repeated indications, in particular in Dame Priti Patel's statement, that funding was viewed as inadequate to address small boats, and that vitally included Manston and also the question of onward accommodation or alternatives to detention. So to give you one reference, paragraph 128 of Ms Patel.

Turning now to row 4 — that's Number 10 — as we understand it no statements have been sought from Number 10 Downing Street, yet, for the reasons I've

90

already given, Number 10 clearly did play a critical decision-making role. For example, we say that the Inquiry would benefit from a statement from the Prime Minister's Private Secretary for Home Affairs. If one looks at paragraphs 211 to 212 of Mr Ridley, that shows significant pressure from Number 10 through the channel of that private secretary to vastly increase the immigration detention estate at speed.

Ms Braverman's statement indicates, at paragraph 29, that officials in the Prime Minister's Office were fully aware of the problem of detention in excess of statutory time limits at Manston. Ms Moffatt points out, "Well, that may be uncontroversial", but there is a question of the quality of the briefings that were being passed up the chain, as it were, what was being told to the Prime Ministers.

I move on now to rows 6 and 7, Mr Zahawi and Mr Dowden, who sequentially held the post of Chancellor of the Duchy of Lancaster, and the Inquiry, as has been pointed out, has already very properly approached Mr Malthouse and Mr Barclay, two earlier holders of that post, a post which entails key coordinating responsibility for policy and for the Cabinet Office.

But it is Mr Zahawi and Mr Dowden who in fact held that key post at the height of the crisis. Mr Zahawi,

91

importantly, can shed light — he was chairing Cabinet Office meetings in that period — upon the Cabinet Office's reaction and any steps taken as the issue of detention in excess of statutory time limits featured on the Cabinet Office's stocktake agenda; see, for example, Mr Ridley, paragraph 441. Mr Dowden, meanwhile, held that key office in the period where eventually steps were taken to empty Manston and close it temporarily. These are precisely the sort of officials or, rather, former ministers who we say should be heard from to address the question of whether, as Ms Dobbin KC puts it, political decisions were being taken that put hard-working people lower down the food chain — apologies, my crude words — in an impossible position.

I turn now to row 14, a further proposal, Mr Sherozy Zaq, who has already specifically been mentioned by Ms Moffatt. We do believe it would be critical for the Inquiry to hear from Mr Zaq, who, to our knowledge, was the only — supervised the only team to achieve access to somebody while they were being held in the relevant period at Manston. We understand that proposal to be endorsed by CTI, which we welcome.

As to the other people in relation to legal advice, we believe it is critical also for the Inquiry to hear

92

what is the ordinary position for those held for longer periods under the Immigration Act as concerns access to immigration advice and how was this different. The question of Manston operating as a short-term holding facility is closely related to that question of how it was de facto operating as a detention centre, holding people for far longer periods, without, according to them, the kind of services and vital access to legal advice that they would have had in an immigration removal centre, for example.

That is why we have proposed Pierre Makhlouf, the former legal director of the largest legal aid charity — legal advice charity, I should say, working with immigration detainees in the UK. He can explain how the system ought to function for those held for longer periods and, by contrast, what did not happen at Manston, which was any contact with bail for immigration detainees.

I turn now to item E on the CTI's list of points to be addressed, namely expert witnesses. Here too the legal teams have divided up our focus and I shall focus on the need for an expert to address the developmental and psychological impact of detention at Manston on children. First, however, may I say something about the test to be applied in determining whether an expert

93

should be instructed? We agree with CTI that Mr Justice Warren's three-staged approach in *British Airways v Spencer* offers a starting point but we would respectfully emphasise the following three points: first, the question of necessity always includes the question of necessary for what, necessary for what purpose, and Mr Justice Warren's judgment, given in the context of a dispute over a pensions scheme, posits the test of whether evidence is necessary to resolve a pleaded issue. An inquiry, however, does not need to resolve issues in the same way as civil litigation. It is a search for the truth and, crucially, in the present context, for the identification of measures to avert repetition in the public interest. That point, that expert evidence may be needed to enable the making of meaningful recommendations is fortified by the Article 3 duty here. The investigative duty includes prevention.

The second point I would make in relation to the test is that the question in both CPR 35.1 and in the terms of reference for this Inquiry is what is reasonably necessary, and reasonableness is also contextual. The more serious the issues and the more essential they are to the proceeding, the more flexible the approach that will need to be taken to evidence and the question of Article 3, harm to children, could

94

hardly be more serious or more central to the matters to be investigated by this Inquiry, as CTI rightly recognise.

Thirdly, even in civil litigation and even if evidence is not necessary to resolve an issue, the evidence may still have to be admitted because it is helpful to the resolution of the proceedings as a whole.

Thus, as Mr Justice Warren cautioned at paragraph 25 of his judgment:

"Even in civil litigation, where no ECHR rights may be at stake, the court should not be over-zealous in excluding evidence in order to save time and cost [as read]."

I turn now to the question of whether the Inquiry should instruct an expert or, as we have proposed, two experts together from the disciplines of psychiatry and psychology to address the impact of detention on children.

We respectfully endorse the proposal of CTI that, provided the conclusions of the experts who gave generic reports in the Manston civil claims, copies of which have been supplied, concerning the impact of detention on children, are uncontentious, then no further expert evidence may be required. May I, however, be clear which experts we are talking about? It is

95

Dr Fairweather and Dr Given—Wilson in their joint report — that's a consultant psychiatrist and a clinical psychologist — and also Dr Hughes. The former two focused upon unaccompanied asylum-seeking children and, by definition, teenagers; Dr Hughes was particularly focused on accompanied smaller children.

We do say, as CTI rightly accept, that if there is not unanimous acceptance of their conclusions, then expert evidence concerning the impact of detention at Manston on children, which we say must look at both mental health impact and developmental impact, will be required. It is of course (inaudible) an area of specialist expert knowledge and it is not an area on which any of the existing experts instructed by the Inquiry have particular expertise.

As to this process, and very helpfully proposed by Ms Dobbin KC, of seeking consensus between the IPs to ascertain whether the conclusions of those three experts are in contention, we would say the following. First, that process should happen as soon as possible so that, if consensus is not there, then evidence can immediately be commissioned by the Inquiry, avoiding any unnecessary delay. Second, we respectfully suggest — and I should say that this is on behalf of Duncan Lewis not having had the opportunity yet to discuss it with other

96

1 detained person IPs — we would suggest that detained
2 person IP legal teams should be given a brief
3 opportunity to comment on the draft list of conclusions
4 being put to other IPs before that list is finalised, to
5 save any subsequent toing and froing.

6 Finally, and perhaps most importantly, we do say it
7 must be clear, particularly in circumstances where, as
8 I've said, there is an appearance of very regrettable
9 disengagement by some Inquiry Participants at present
10 for the purposes of this hearing, it must be made clear
11 to all IPs either that they must respond to the
12 questions or that failure to respond within a specified
13 timeframe will be taken as acceptance. Clearly, the
14 Inquiry cannot be put in a position where, much as has
15 occurred with the redaction, there's a serial toing and
16 froing, and it obviously cannot be the case that it is
17 discovered far too late that expert evidence should have
18 been commissioned.

19 I turn now to the final question, which is readiness
20 and timing as concerns the Duncan Lewis Inquiry
21 Participants. As of today, Duncan Lewis has submitted
22 35 draft witness statements and they are making good
23 progress for approximately 17 further clients who, we
24 anticipate, to be willing and able to provide
25 statements. We are grateful for the Inquiry's

97

1 flexibility concerning the provision of those statements
2 as well as for the Inquiry's helpful comments concerning
3 the draft supply.

4 Having obtained Home Office consent to provide
5 detention-related documents, disclosed by the
6 Home Office in the civil litigation, Duncan Lewis are
7 now working to collate relevant documents to exhibit,
8 and the Inquiry will note that yesterday exhibit bundles
9 were filed alongside the draft statements.

10 While very eager indeed to ensure that the hearings
11 can start at the earliest realistic opportunity, the
12 task for the Duncan Lewis legal team of preparing draft
13 statements has been complicated by a range of issues on
14 which I shall now touch briefly. First, the size of the
15 cohort. At 75, this is the largest DPIP cohort by some
16 distance, so that the outstanding statements that Duncan
17 Lewis will supply will, for example, be complicated by
18 the need for the same case workers to process, with the
19 first 35 who have given draft statements, the helpful
20 comment of the Inquiry and also to collate outstanding
21 exhibits where those were not yet supplied.

22 Second, and this is an issue common to all the
23 DPIPs, the multiple cross-cutting vulnerabilities of
24 those we represent, which has rendered the process of
25 taking statements painful for the DPIPs and painstaking

98

1 for their legal team.

2 Third, we would emphasise that vital tasks cannot
3 progress without the Home Office undertaking. We
4 entirely agree with Ms Dobbin KC's observation that the
5 lack of the undertaking does not prevent the provision
6 of draft statements. However, we do not currently have
7 instructions to provide final statements for onward
8 disclosure in the absence of that undertaking.
9 Moreover, anxiety about the lack of the undertaking is
10 a significant barrier for those of our DPIPs who are
11 contemplating giving oral evidence. We are, however,
12 conscious of the need for the Inquiry to plan now for
13 the number of witnesses giving oral evidence and have
14 therefore indicated that we would expect approximately
15 eight Duncan Lewis DPIPs to give oral evidence.

16 I have mentioned 35 draft statements filed and
17 approximately 17 more which Duncan Lewis anticipates
18 being able to obtain. As for the remainder, nine are
19 unable to give statements owing to their very young age;
20 three are unable to do so owing to severe health
21 difficulties, although we hope that for some that
22 inability may prove temporary. Among the rest, however,
23 Duncan Lewis have observed increasing anxiety and loss
24 of hope over the Inquiry, driven in part by the delay in
25 starting the Inquiry and also by the delay in obtaining

99

1 the key Home Office undertaking. We have written
2 recently to the Inquiry legal team seeking a meeting
3 concerning how best to address outstanding matters
4 relating to the draft statement, including the position
5 of that minority who now may wish to participate but
6 without a statement or be unwilling to participate at
7 all.

8 I should also add there has been some difficulty in
9 securing sufficient hours for solicitors' work in order
10 to prepare each statement, a matter concerning which
11 Duncan Lewis is already in separate correspondence with
12 the Inquiry team. Duncan Lewis have therefore
13 respectfully, in their letter of 18 September, proposed
14 that they be given until 30 October to file their
15 outstanding statements.

16 That concludes my submissions for Duncan Lewis,
17 unless there are any questions.

18 THE CHAIR: Thank you, Ms Dubinsky.

19 Ms Dubinsky, can I ask you over the luncheon
20 adjournment — you proposed for the purpose of
21 directions the suggestion, having heard from CTI's
22 submission in respect of the children expert, a short
23 period of time that you're suggesting the detainees
24 would need to consider in respect of the conclusions of
25 the Fairweather, Given-Wilson and Hughes report. Can

100

1 I ask you, over the luncheon adjournment, with the
 2 detainees' solicitors — bearing in mind it's
 3 a particular matter that Bhatt Murphy's submissions
 4 address — to give some thought as to what that short
 5 period looks like in the hope that we can make progress
 6 on those directions also today and set those in place
 7 today.
 8 MS DUBINSKY: Certainly.
 9 THE CHAIR: I'm very grateful to you.
 10 Can I indicate I'm very grateful to you for your
 11 submissions.
 12 I don't think the secretariat had an opportunity to
 13 speak to the other advocates who are to address me this
 14 afternoon, but the request is made also, unless it's
 15 fundamentally inconsistent with how you like to make
 16 submissions, that those submissions also be delivered
 17 seated for audio and visual reasons. But if there's
 18 a reason that that's really not the way you like to
 19 deliver your submissions, if you can just make that
 20 known to the secretariat so we can essentially make sure
 21 the microphones are positioned to capture you.
 22 We'll take now a 50-minute break for lunch and if
 23 everybody could be back in the hearing room by 1.50,
 24 please. Thank you very much.
 25 (12.58 pm)

101

1 (The short adjournment)
 2 (1.50 pm)
 3 THE CHAIR: Mr Nicholls.
 4 MR NICHOLLS: Chair, thank you. As you know, I will be
 5 making oral submissions on behalf of the Deighton Pierce
 6 Glynn IPs.
 7 THE CHAIR: Is your microphone on, Mr Nicholls?
 8 MR NICHOLLS: I believe it is. I'm told it is. I imagine
 9 someone will shout at me if it's not.
 10 Submissions by MR NICHOLLS
 11 MR NICHOLLS: Can I start by thanking you, Chair, and your
 12 team for the opportunity to make these submissions? I'm
 13 intending to address you under five broad headings which
 14 I'll take relatively briefly: first, issues affecting
 15 the progress of the Inquiry, briefly on delay and
 16 disclosure; second, issues concerning witnesses; third,
 17 expert evidence; fourth, the broader picture of
 18 misconduct summarised by Ms Dobbin, both in the written
 19 note from CTI and in her oral update this morning, and
 20 in particular its relevance to two particular issues
 21 that are before you today; and very briefly, finally,
 22 the issue of readiness on behalf of the DPG IPs.
 23 Before I start, we know, Chair, and we note that you
 24 are eager for the Inquiry to progress and so are we and
 25 we wish to help maintain the progress of the Inquiry.

102

1 That is the foundation that underpins all of the
 2 submissions that I seek to make.
 3 Turning then to the first of those topics, progress
 4 of the Inquiry. Ms Dubinsky has addressed you on the
 5 issues of delay and late applications. We won't repeat
 6 what she's said.
 7 On behalf of the DPG cohort, can I add this: in
 8 matters such as this, we would suggest that past conduct
 9 is often a good guide of future behaviour and that gives
 10 a cause for concern here because, notwithstanding the
 11 collective expressions of desire for progress and words
 12 to that effect, this Inquiry will inevitably take some
 13 time from now to its conclusions to get to Day 1 of the
 14 evidence hearings, to complete the hearings, the painful
 15 further time required for the dreaded Maxwellisation
 16 process, and as that time passes, what the Inquiry needs
 17 is state and other IPs who are engaged with the process
 18 and focused on its progress. That is also crucial in
 19 our submission because it will convey to all concerned
 20 that the Inquiry is being taken seriously and that it
 21 matters; that its findings and recommendations will be
 22 taken seriously and that they matter. At the moment,
 23 for our part, it is not clear at least for some aspects
 24 of the past history of this Inquiry that that commitment
 25 has been entirely forthcoming from all other IPs.

103

1 An example is very late redaction applications,
 2 where material provided at review processes sits waiting
 3 for months. Another example is the undertaking and
 4 I want to make just brief observations on that on behalf
 5 of DPG. We note the update from your counsel, Chair,
 6 and we of course share the desire for the undertaking to
 7 be provided as soon as possible, in particular because
 8 our clients cannot provide their final statements until
 9 it is provided, in circumstances where, in our case,
 10 draft statements were provided on behalf of our clients
 11 to the Inquiry back in April of this year. Now, we of
 12 course recognise that the granting of the undertaking is
 13 a matter for the Home Secretary, not for you, and we
 14 recognise that your team are doing their utmost on this
 15 issue.
 16 I just add two points to what Ms Dubinsky has said.
 17 First, it might be thought that the Home Office's time
 18 or delay in providing the undertaking does not sit
 19 entirely easily with the Department's submissions that
 20 have been made over the course of one page for this
 21 hearing because, in that note for this hearing, the
 22 Home Office said this, that it remains "committed to
 23 assisting the Inquiry carrying out its work and
 24 reporting its findings as quickly and effectively as
 25 possible in fulfilment of the terms of reference [as

104

1 read]. That's paragraph 1.
 2 The Home Office note goes on, paragraph 5:
 3 "The Home Office would wish to underline its hope
 4 that the substantive hearings can take place as soon as
 5 reasonably possible [as read]."
 6 Well, there is an immediate way that the Home Office
 7 can take action to make good on those words, by
 8 providing the undertaking which was requested in June.
 9 The second point, which Ms Dubinsky has already
 10 touched on, is that the undertaking is not a complicated
 11 issue, in our submission. It is identical to the one
 12 given by the Home Secretary in the Brook House Inquiry
 13 and in those circumstances we would ask that it is now
 14 given.
 15 Can I turn next to the issue of disclosure? The
 16 starting point is to record our clients' gratitude for
 17 your team's work, Chair. We are conscious that the
 18 Inquiry has been very busy and is making considerable
 19 efforts on disclosure and that that requires a huge
 20 amount of effort. We are also alive to what is still
 21 left to be done in the context of the multiple hurdles
 22 described by your counsel in the note in advance of this
 23 hearing which have, it seems clear, impeded the
 24 Inquiry's disclosure process because they have diverted
 25 attention from it.

105

1 The upshot is that around half of the anticipated
 2 disclosure has not yet been onwardly disclosed to us and
 3 other IPs and the effect is that at the moment we cannot
 4 work on that material and that limits our ability to
 5 assist your Inquiry, for example, by identifying
 6 follow-up work and preparing for the hearings when they
 7 come. That in turn hampers the participation of our
 8 clients.
 9 We are grateful for the Inquiry's commitment to
 10 disclose the further 2,000 documents by the end of this
 11 month and we understand from Ms Dobbin's update this
 12 morning that it's expected that, by the close of this
 13 month, the outstanding balance of disclosure to come out
 14 to IPs will be approximately 6,000 documents with an
 15 indication from your team that the aim is to disclose
 16 2,000 documents per month thereafter in order to convene
 17 the hearings asap. We endorse all of that.
 18 We had suggested in our written submissions that you
 19 might wish to publish a timetable for the disclosure of
 20 the outstanding balance. It seems as though Ms Dobbin
 21 has identified exactly such a timetable and we're eager
 22 that that is met. We have identified brief further
 23 practical steps in our written submissions. This was 38
 24 to 40. There are just two that I would wish to
 25 emphasise orally.

106

1 As your counsel has helpfully confirmed, both in
 2 writing and orally today, there do remain tranches of
 3 disclosure held within the MPR process sat there for far
 4 longer than the Inquiry's limit. In some instances,
 5 documents have been waiting to be cleared for months and
 6 we strongly support your team's intention to require
 7 that those documents are progressed as a matter of
 8 urgency.
 9 Second, your counsel indicated this morning that now
 10 is the moment where IPs must inform the Inquiry of
 11 applications for redaction and anonymity. We entirely
 12 agree. It seems clear that the Inquiry has been
 13 hampered by a drip—drip of late applications which have
 14 diverted it from its work and we would invite you to set
 15 a guillotine for any further applications for redaction
 16 on anonymity where material has already been provided to
 17 the Inquiry, with a fixed date set after which further
 18 applications will only be considered in exceptional
 19 circumstances.
 20 Can I turn next to the footage that Ms Dobbin
 21 referred to this morning? We're grateful for the
 22 update. It addresses in a number of respects some of
 23 the points that we'd raised in our written submissions.
 24 Our clients are, I hope understandably, concerned to
 25 understand what the footage shows and to ensure that any

107

1 and all other footage that might exist is preserved,
 2 obtained and considered by the Inquiry, and we
 3 understand from Ms Dobbin that that is exactly what is
 4 happening in the enquiries that your team are now
 5 making.
 6 On the update that was provided this morning, can
 7 I add this: the update indicated, among other things,
 8 that Mitie holds, as we understood the update, 109 clips
 9 of footage, and it was indicated that one of the reasons
 10 given for why the cameras may have been turned on was in
 11 relation to the use of force. That would obviously
 12 suggest that at least a large amount of those clips
 13 concern instances of the use of force. Obviously
 14 I don't know whether it's all of them.
 15 That is significant, we suggest, not only because it
 16 may show individual instances of a use of force, but
 17 because 109 clips is a substantial number that may
 18 itself show patterns in the use of force that can be
 19 analysed as well as, importantly, providing
 20 contemporaneous evidence of conditions and treatment at
 21 Manston, which are two central matters within the terms
 22 of reference, because, of course, as well as showing
 23 individual instances of use of force, without knowing
 24 what the footage shows, I anticipate it may show what
 25 the marquee looked like, what the conditions were on

108

the ground, as well as how people were being spoken to and treated, among other things.

Ms Dobbin also illustrated that potentially relevant footage exists, as I understood it, from Kent Police, the Home Office, albeit limited in amount, and others. There was reference to ITV and ITN and one other. As I understood it, that footage is being considered by the Inquiry. It was not clear and it may have been my misunderstanding as to whether that has been obtained and is being considered or whether discussions are being had about obtaining it. Certainly our central request, bringing those matters together, is that the footage should be obtained, reviewed and disclosed as soon as possible, with an appropriately broad approach to the potential relevance of such material in terms of the disclosure of what's provided. We understand that the Inquiry has to take an approach of reasonableness and proportionality, but particularly where you have contemporaneous evidence that may show treatment and conditions on the ground as well as use of force, we would suggest the focus should be on disclosure rather than non-disclosure.

We would also ask that, to the extent that this is not already being done, all reasonable steps are taken to ensure that all other potentially relevant footage is

109

identified and secured. It may be that Ms Dobbin will respond and say, "We are doing that", and of course, if that's the case, we'll be very grateful.

Pixellation. I'll take this very briefly. We addressed it in our written submissions. We have some concerns about the approach, we retain some concerns about it, but we will of course take up Ms Dobbin's request to consider the footage first and have an argument later, rather than doing it the other way round. So, in those circumstances, can we do that and return to the issue and discuss it with your team as needed in due course?

Chair, those are my submissions on the footage and we will wait to hear further from your team.

Can I turn to my second heading, which is witness issues. We've addressed the provisional witness list in our written submissions. Given the time limits of today's hearing, can I make just two overarching observations about the issue of the provisional witness list? The first is the issue of its focus on corporate and senior witnesses rather than those on the ground. We suggest and indeed maintain that that imbalance is present in the current iteration of the provisional witness list and it sounds as though it may be maintained in the later iteration that's due to come

110

later in the autumn if the submissions from CTI were to be accepted.

So can I come on in a moment to address the helpful explanation from Ms Dobbin about the Inquiry team's consideration of this issue; that is to say reasons why, Chair, you may consider that on—the—ground witnesses are not needed or further are not needed. Before I do that, may I make this observation, that we consider, Chair, that you may be acutely aware from your very extensive experience of inquiry work that hearing from those on the ground, those directly involved, those who can speak to how things felt, the pressures from above, the day—to—day reality of the experience that's being investigated by the Inquiry — that perspective is often extremely significant and very often the most illuminating, with no disrespect intended to corporate witnesses and senior officials.

Against that context, Ms Dobbin has raised three broad reasons why you might consider that on—the—ground witnesses are not needed here. We've considered those carefully. I didn't have lunch as a result of considering those matters so carefully! Can I address them?

The first is that Ms Dobbin says, "Well, this is an inquiry, not a trial of fact about specific

111

allegations". That's true, but it's true of every inquiry because statutory inquiries are not permitted to determine civil or critical liability. I don't need to cite the relevant statutory provision, you'll be very familiar with it, Chair, and non-statutory inquiries do not do so. But inquiries routinely do hear from on—the—ground witnesses for a range of important reasons, in particular so that they can receive best evidence that bears on and allows for determination about the terms of reference. That applies here, we submit.

The terms of reference for this Inquiry require it to investigate the conditions encountered at Manston and, second, the treatment of those detained at Manston by staff at Manston, including by contractor—provided staff at Manston. The terms of reference call for evidence from on—the—ground witnesses, not the opposite.

Second, Ms Dobbin suggested that there is a broad base of evidence from which to reach conclusions about misconduct and to make findings and that therefore on—the—ground witnesses aren't required. But, with respect, Chair, in my submission, the focus should not be on findings about misconduct, certainly not alone. The focus should be on the terms of reference and the terms of reference require consideration of conditions.

112

1 Those on the ground will provide best evidence on that
2 issue. The terms of reference also require
3 investigation of treatment, including by staff and
4 contractor staff. Those on the ground, staff and
5 contractor staff, will provide best evidence on that
6 issue.

7 The terms of reference also require examination of
8 leadership concerning conditions, treatment,
9 accommodation, outflow and so on and the impact or lack
10 of impact of that leadership at ground level. Ms Dobbin
11 indicated that the lens of the Inquiry is a wide one,
12 and it is, but the effect of the current submission
13 advanced by CTI is to look at this issue of leadership
14 only through one end of the telescope. What you need is
15 evidence from both sides of the telescope to understand
16 what leadership there was, if there was any, from the
17 perspective of those on the ground who were supposed to
18 be being led: how was that leadership experienced, if it
19 was? What impact was there on the ground, if there was
20 any? The people who can answer that are those on the
21 ground. The people at the top can't. That is not
22 a broad base of evidence from which to investigate and
23 reach findings on the issues on which the terms of
24 reference require determination.

25 Third, it was then suggested that there are

113

1 practical issues in this particular Inquiry about
2 front-line workers giving evidence and, as I understood
3 it, in particular that there are hundreds of people from
4 a large number of different organisations where that
5 might apply. But we say this: that is true in very many
6 inquiries. The exercise is to identify an appropriate
7 selection of some on the ground to provide the important
8 perspective. There is not a practical obstacle. There
9 is a filtering exercise that happens in very many
10 processes and that would be required here. We of course
11 trust your excellent and well-resourced team to conduct
12 that filtering exercise, but it needs to be done.

13 So, for all those reasons, in our submission, there
14 are cogent reasons to identify a limited proportionate
15 number of on-the-ground witnesses and we would invite
16 the Inquiry to do so.

17 I said I had two overarching points. That was the
18 first very long one. The second is rather shorter,
19 about witness list issues.

20 We're grateful to your team for their careful
21 consideration of the suggestions that we've made in
22 annex B. You've received a lot of annexes. I think
23 it's probably quite unhelpful that we've also called
24 ours "Annex A, B and C", when your team have done
25 exactly the same. I realised that as I was preparing

114

1 for this hearing. Because of that and time, I'm not
2 going to turn up annex B, but can we invite you and your
3 team to focus attention on it in due course after this
4 hearing?

5 What we've tried to do is to direct your attention
6 to a small — and it really is small — pool of
7 witnesses whose evidence at this stage, it seems to us,
8 bears directly in important ways on a number of the
9 issues that the Inquiry is tasked with examining. I am
10 tasked with addressing the first four witnesses in
11 annex B. Luckily, Ms Moffatt has already addressed
12 three of the four in ways that are extremely helpful and
13 I think will significantly reduce what I need to say.
14 So can I briefly address them?

15 First, David Neal. Ms Moffatt indicated that the
16 Inquiry team considers his evidence is highly likely to
17 be significant. We agree. Second, Emma Churchill, she
18 was the Director General for Migration and Borders
19 from January 2022. Ms Moffatt identified her as
20 a witness who may be added to the witness list in due
21 course. We strongly agree. We set out why in annex B.
22 In particular, she gave direct advice to the relevant
23 home secretaries and was receiving direct reports from
24 Mr O'Mahoney. She has important evidence to give and
25 questions to answer about operational oversight and

115

1 management of the site.

2 The third witness in annex B on our list at row 3 is
3 Anthony Eastaugh. I apologise if I've mispronounced
4 that name. He was the Director General of Immigration
5 Enforcement. We've set out why we say he's relevant but
6 can I distil it in this way: he identifies a number of
7 steps that were taken to, among other things, have
8 detainees bailed or moved on from Manston which were
9 blocked at ministerial level. He also consulted the
10 Home Office's ethical champion on how officials should
11 "navigate the ministerial refusal of bail from an
12 ethical, moral and professional perspective [as read]".
13 We say it's important that his evidence is heard to
14 properly understand how it was that efforts that were
15 made to alleviate the risk and harm at Manston were
16 identified but then stymied.

17 Finally, my submissions in annex B, row 4,
18 Ms Tierney. Ms Moffatt again identified Ms Tierney as
19 a witness who may be added to the witness list in due
20 course. Again, we strongly agree for reasons that are
21 set out in the annex.

22 In our written submissions — and I'm now turning,
23 Chair, if I can, to the issue of special measures which
24 Ms Dobbin touched on this morning and which CTI have
25 addressed in considerable detail in their written note.

116

We address it in detail at paragraphs 19 to 29 of our written submissions. The length of the written submissions reflects the importance of that issue to our clients. It's an acutely important issue in this context, where our clients are likely to be particularly inhibited or fearful in respect of their status and rights and where many will be inherently vulnerable or have their own specific multi-factorial vulnerabilities.

We consider it's an issue that requires careful thought and we can see that your team has approached the issue in exactly that way. We also have no doubt, Chair, that you will approach it in the same careful and rigorous fashion.

Given the time, can I just distil our submissions into a few central points and beyond that simply rely on the written submissions? We have suggested first that special measures applications are determined in advance, with the outcome conveyed to the witness to provide much-needed certainty, and we anticipate — I understood that to be essentially agreed.

Second, while we understand that the Inquiry has little control over interpreter availability, where interpreters are needed, we would invite the Inquiry to make particular arrangements for those clients whose trauma is attributable to gender-based violence and

117

where there is a particular need for consideration of their needs and sensitivities in relation to interpretation.

Third, we do maintain respectfully that detainee witnesses are questioned only by CTI or their own counsel. That is a permissible course to achieve best evidence, it's been done in a number of other inquiries and importantly it does not inhibit your discretion, Chair, to enable your CTI to put questions which have been raised by others in a sensitive and appropriate way.

Fourth, we've identified a number of practical arrangements which we would invite the Inquiry to adopt, including pre-hearing visits, a live link from a familiar location if that's needed on the particular facts and so on, and we would invite your team to take those on board.

Next topic, expert evidence. Just briefly, DPG's overarching position, so it's on the record, given the evolving nature of this issue, and then I'll touch on the use of force issue more substantively. DPG's position is in short this: we strongly support the instruction of an expert on institutional racism and culture. I anticipate that we will fully endorse the submissions that Ms Luh will be making when I sit down;

118

we support the proposed approach to expert evidence on the impact of detention on children that was identified by Ms Dubinsky following consideration of CTI's submissions this morning; in respect of an expert on clinical care for women and children, we've listened carefully to the update from CTI and will of course await the update from CTI and your team by Dr Hard; on use of force, we maintain our submission that expert evidence should be obtained to consider the use, governance and oversight of force, discipline measures and other punitive measures.

I'd like to bring together the threads of our submissions in writing now, if I may. The starting point is that the terms of reference require investigation of the use of force, control and punitive measures. I say that because the terms of reference expressly require the Inquiry to investigate the treatment of detainees and the use of force, control and punitive measures is arguably one of the most important instances of the treatment that people experienced at Manston.

The evidence that we've seen — and this is added to by Ms Dobbin's update this morning — indicates that there are significant concerns about the inappropriate use of force against detainees and serious concerns

119

about the unjustified and inappropriate use of discipline and punishment. That includes, as Ms Dobbin referred to earlier, suggestions of children being dragged and detainees being punched. We've seen reference to detainees being subject to knee strikes. Ms Dobbin described the apparent use of force as "casual". We would agree. There is evidence of that. There also appear to be instances of de facto enforced isolation in vans and cars, and CTI's note referred to some examples of this. At the same time, the evidence suggests a concerning lack of recording and governance about the use of force; for example, Border Force use of force reports seem to us to be both poor in quality and extremely short and the use of forms completed by Interforce staff have been destroyed.

Ms Dobbin referred to multiple systemic issues here, for example: how was the use of force that was not authorised by statute overseen? What processes were in place when force was used? The evidence that we've seen also suggests issues with detention management. There are references to detainee protests and what appear to us to be heavy-handed responses that were liable to escalate and increase the risk rather than achieving the opposite.

There is also this question: if detention was

120

outside the law, as CTI suggest may have been the case, then so was the use of force, punishment and control. The overall picture is one of concerning force, questionable use of punitive measures and a lack of oversight and governance. These are systemic issues. They essentially concern the proliferation and culture of force, restraint, unauthorised control and punishment when an environment is unregulated and outside the law. That is precisely the kind of systemic issue that an expert can be asked to address in order to assist you.

We have suggested in our original letter on this issue that Mr Collier assisted the Brook House Inquiry in relation to use of force and he did, including in relation to many of these issues, not merely individual instances of the use of force and, for example, restraint techniques, but also issues of training, management and discipline, governance, auditing and oversight. We say these are all matters at the heart of this Inquiry. They fall within a recognised expert discipline because there are standards which an expert can identify and apply and in those circumstances there are sound reasons to obtain this evidence.

Can I turn briefly to the fourth heading I flagged, the broader picture of misconduct that Ms Dobbin has summarised. I think I have three minutes so I'll be

121

quick. We're grateful to Ms Dobbin for the update on the themes that are emerging from the Inquiry's work. The broader picture, summarised by Ms Dobbin this morning and in writing in the note, includes apparent corruption on the part of staff, racist language, inappropriate force, the use of drugs by staff on site, officers shouting and intimidating detainees, withholding fresh air from detainees, threatening to withhold food, improperly segregating or isolating detainees and safeguarding incidents involving young children. These matters are a disgrace and of the utmost public concern. They are also central to your terms of reference and they are relevant to at least two key issues before you today. First, what's been described as the "broader picture of misconduct" very strongly supports the need for an expert on institutional racism and culture because the broader picture reveals a rotten culture, unchecked, ungoverned and dangerous.

Second, the broader picture of misconduct strongly supports the need for on-the-ground witnesses because the issues that have been identified, corruption, racism, dehumanisation, use of force, safeguarding failures, these are on-the-ground issues as much as they're issues for senior officials.

122

In the final one minute, can I finish with DPG readiness? I should be able to complete within less than that time. As you will be aware, Chair, DPG have been engaged in constructive and fruitful dialogue with your team for a number of months and will continue to assist the Inquiry. We provided detailed draft witness statements for 20 of our clients and 19 of those were provided on 2 April this year. Statements are in the process of being finalised, having addressed the Inquiry's requests, including in relation to exhibits, and once the undertaking is provided by the Home Secretary, all final and signed statements can be provided by 30 October.

So with 15 seconds left, that was all I wanted to say. Unless I can assist you further, those are my submissions.

THE CHAIR: Thank you very much, Mr Nicholls, but also thank you for the time you spent over lunch perfecting your submissions. I hope there's some food waiting for you after you finish here.

MR NICHOLLS: Thank you.

THE CHAIR: Ms Luh, can I next turn to you, please, to make your oral submissions on behalf of Wilsons, Gold Jennings and Bindmans. We're obviously slightly running over, so I think you have until just before 3.10, and if

123

you can perhaps draw it to a close around that time and we'll then take our short mid-afternoon break.

Thank you.

MS LUH: I'm grateful, Chair.

Submissions by MS LUH

MS LUH: Chair, along with Ms Benfield, I appear on behalf of three cohorts of former detainees, Wilsons Solicitors, Gold Jennings and Bindmans. Our clients are grateful for the opportunity to make submissions today. They fully recognise the scale of the Inquiry's task and value the candour with which the Chair has reported month by month on where the work has reached. Our clients are of course disappointed that, nearly four years on, there's still no date for hearing but they will be pleased to hear the Chair's commitment to commencing hearings in the near future.

But there's still a significant amount of work to be done in the meantime. Central to issues for today is the single practical question: what will it now take for this Inquiry to conduct a thorough and effective Article 3 investigation that its terms of reference require and now to do so with reasonable expedition? With that in mind, I'd like to address you on six topics: first, delay; second, cooperation that the Inquiry needs from certain witnesses and institutions;

124

1 third, the outstanding Home Office undertaking; fourth,
2 the gaps that we maintain are still in the witness
3 evidence; fifth, this Inquiry's powers and whether or
4 not it has the powers needed to conduct an effective
5 investigation; and sixth and perhaps most importantly
6 for our clients, the need for an expert on institutional
7 culture and racism.

8 On two further matters, special measures and
9 outstanding disclosure, we rely on our written
10 submissions and don't rehearse those.

11 On delay — I begin with this issue deliberately
12 because it is the issue that gives all other issues its
13 urgency — the need for this investigation didn't creep
14 up unseen. Even while Manston was still operating, the
15 disclosure shows that the Home Office was warned of the
16 conditions and warned of risks of violations of human
17 rights.

18 Ms Dobbin this morning identified how those risks
19 were reported, were escalated to the most senior levels
20 of the Home Office, but that rather begs the question
21 why, once they had been seen and reported, Manston
22 continued to operate as it was. It's regrettable that
23 the provisional November hearing date fell away because
24 you, the Chair, couldn't be confident that there was
25 sufficient engagement and cooperation from institutional

125

1 participants and there had not been enough witness
2 evidence and disclosure in readiness for the hearings to
3 proceed.

4 Each week of delay is a week, of course, where the
5 state's obligation to conduct an Article 3 investigation
6 is not met. That passage of time is not a neutral
7 backdrop to this Inquiry's work; it is itself a threat
8 to the effectiveness of this Article 3 investigation.
9 For our client, it is the difference between an account
10 that can still be given and an account that fades with
11 every month that passes. Our clients therefore strongly
12 endorse the Chair's indication this morning that the
13 Inquiry will commence hearings and our clients seek this
14 with more urgency than anyone else because it's their
15 experiences that remain unexamined. We've called for
16 hearings to commence by late February/early March and we
17 think that is realistically when it can be done because
18 of the work that still needs to be done.

19 We ask the Chair to be clear-eyed about the
20 continued risk to the timetable for hearing, the
21 outstanding undertaking, the further applications for
22 redactions and anonymity, the continued delays in the
23 material provided for the review process, the gaps in
24 evidence and the expert question. Nevertheless, fixing
25 a date for hearing will undoubtedly concentrate minds

126

1 and tell our clients that this Inquiry is moving
2 forward.

3 Fixing a date alone is not enough. Whether this
4 Inquiry can hold that date, whether, when it sits, it
5 will be effective, depends on the cooperation of Inquiry
6 Participants. Counsel to the Inquiry has identified
7 witnesses who failed to provide statements on time,
8 failed to provide clarifications that were sought. That
9 is disappointing and a waste of time and resources.

10 We are pleased to hear that there has been better
11 progress of late, but it's not just about the giving of
12 written evidence. The Inquiry doesn't have the luxury
13 of time and resources to do the same exercise when it
14 comes to ensuring full and willing cooperation from
15 witnesses invited to give oral evidence. It is
16 essential that institutional participants do so
17 proactively engaged rather than reactively.

18 The clients I represent, the need for answers on
19 inadequacy of medical screening, care and treatment is
20 particularly acute and they are anxious that there is
21 consistent and proactive engagement when it comes to
22 oral hearings without the need for compulsion. Medevent
23 provides clinical services at Manston. For many of our
24 clients, the inability to access adequate medical care
25 had profound consequences. One of our clients

127

1 contracted diphtheria and didn't receive prompt
2 intervention. He was not met with the same tragic end
3 as Mr Ahmed, but he lives with the serious and enduring
4 health consequences of being denied treatment promptly
5 at Manston. Others contracted other infectious
6 diseases, such as scabies, gastro-enteritis, were unable
7 to access essential medication for ante-natal care and
8 chronic conditions like asthma and fibromyalgia. It is
9 essential for our clients that relevant Medevent
10 witnesses cooperate fully. If they don't and we have
11 a repeat of the past, the Inquiry risks being deprived
12 of evidence that is vital to understanding what happened
13 and why.

14 The lateness of redactions and anonymity
15 applications from several institutional participants is
16 unacceptable. My colleagues have already addressed you
17 on that. No reasons have been offered for these
18 avoidable delays. They impede onward disclosure, divert
19 time which we could have otherwise better spent on
20 reviewing disclosure and preparing for the hearing and
21 force our clients to have to respond to late
22 applications at speed, just to help keep the Inquiry
23 moving. We agree with Counsel to the Inquiry.
24 Ms Dobbin referred, in her oral submissions, to the need
25 for directions on any future applications and, to that

128

end, we endorse Deighton Pierce Glynn's proposal for a fixed deadline.

That brings me to the undertaking, which you have heard quite a bit already on. It is now more than two months since the Inquiry made the request and there's still no answer. I make three short points on this.

First, the undertaking is straightforward and should be non-controversial. It is modelled precisely on the undertaking the Home Office has already given in the Brook House Inquiry. The wording is set out in correspondence before the Chair and, where the answer has already been given once, the answer ought to be capable of being given quickly again.

Second, this is not a point of mere procedure. It goes to the heart of the effectiveness of the investigation. Our clients are being asked to give full candid accounts of what happened to them at Manston, including matters that may touch on their immigration history, journey, detention, vulnerabilities and treatment by officials. They have cooperated as far as they can and that is reflected in the Inquiry having received 74 draft statements from former detainees.

In respect of the clients I represent, Wilsons Solicitors have submitted draft statements for all 17 adults who are Inquiry Participants. The other

129

three are young children. We are working at pace to provide the Inquiry with revised drafts to respond to clarification and to provide exhibits in individual cases by the end of the month.

Gold Jennings has provided 12 witness statements on behalf of the first group of 13 participants, including one child. Exhibits have been provided for 11 of those, with the 12th to follow shortly. We are working at pace in that respect to providing the remainder statements by early October.

Bindmans has already provided statements for four out of six Inquiry Participants, along with some detention records which are in our possession. We will continue to do the work in order to cooperate with the Inquiry, but, without a clear undertaking, it is understandable, in my respectful submission, that our clients are reluctant to speak openly or finalise their statements for onward disclosure.

Their reluctance is not tactical. It is a direct consequence of uncertainty created by the Home Office's continued silence. This uncertainty undermines effective victim participation, which is a core requirement of Article 3. As Counsel to the Inquiry, Ms Dobbin, has already observed, while this Inquiry is temporally limited to a relevant period of time in 2022,

130

it concerns people who have arrived in the UK by small boat to seek asylum and protection and who are still — were and are still at the centre of a fraught and charged debate about immigration in the UK. We therefore can't ignore the successively regressive and punitive changes in law and policy directed at asylum seekers and refugees like our clients, many of which have retrospective effect and will likely impact on our clients continuingly, even when they have achieved settlement in the UK. Our clients are entitled to give their accounts openly, without inhibition and fear that doing so may carry punitive consequences for their immigration status.

Third, the continuing silence on the undertaking casts real doubts for our clients on the Home Office's commitment to learning lessons. It would be deeply regrettable if the effectiveness of this Article 3 investigation were to be undermined by an omission that deters witness evidence. We therefore ask you, Chair, to direct the Home Office to confirm its position in writing by a fixed and short deadline.

Next I address the gaps in evidence. If this Inquiry is to uncover not just what happened at Manston but why, it can't do so principally through the evidence of directors and corporate witnesses, yet that, at

131

present, is the difficulty. The witnesses from whom witness statements have been sought and the provisional witness list are heavily weighted towards senior corporate directorial witnesses. Few actually worked on a day-to-day level on the ground at Manston during the relevant period.

The central issues in section 6 of the list of issues, the physical conditions, the treatment of people, safeguarding, use of force, misconduct, cannot adequately, fairly or effectively be investigated primarily through the evidence of senior managers sitting at arm's length at a desk. Our clients are pleased to hear that the Inquiry intends to seek evidence from Paul Morris, the site operations manager for Mitie. Our clients also fully endorse the Inquiry's position conveyed by Ms Moffatt that it intends to insist on witness evidence from [redacted] and Commodore Craig.

But the Inquiry should not be resistant to calling further ground level witnesses. What we mean by that is not those whose primary job description is desk-based but, rather, those who were present day to day on the ground, experiencing the environment, the smells and the atmosphere.

One example makes the point — when Andy Baxter of

132

the Prison Officers' Association visited Manston, his statement describes security staff supervising from outside of a tent because they were afraid to enter, fears that he found to be unfounded. He met detained people who were very sick, who were emaciated and sleeping on cardboard without bedding. People were pleading for answers but not threatening.

What his account captures is why this Inquiry needs ground—level evidence. It exposes the gulf between perception and reality on the ground. It also raises questions that cannot be adequately answered by corporate witnesses alone: was the dehumanisation of our clients caused by the environment, by pre—existing prejudice, by a lack of training or a culture and tone set from above?

Counsel to the Inquiry, Ms Dobbin, said that the Chair will be able to make findings on incidents of overt racism without hearing from individual officers, but, crucially, why these officers felt able to brazenly use abusive language that was dehumanising to detainees is a question that needs to be answered. The findings made in the Brook House Inquiry show that evidence at the ground— and mid—level from on—site(?) management, staff and individual decision—makers can provide some of the clearest insight not only into what happened but

133

crucially into why people like our clients were treated as less than human.

One officer in Brook House was asked to explain why he repeatedly verbally abused a detainee. In his oral evidence to the Inquiry he said he did so because he wanted to fit in. That evidence speaks to something systemic rather than one—off and can only realistically come from the people on the ground who work in the environment that normalises dehumanisation.

As for the suggestion that obtaining witness evidence, written and oral, from truly ground—level witnesses poses practical difficulties, with respect, the Home Office and its contractors and subcontractors must know who was working on the ground in which tent. Our clients would gladly assist if we are provided with unredacted documents concerning themselves so that we can assist the Inquiry in identifying the relevant individuals. We therefore repeat our urge to the Chair to seek this evidence.

The matters I've just addressed, non—cooperating witnesses, institutional passivity and the unanswered undertaking, are not isolated irritants. Taken cumulatively they raise a structural question that, in our respectful submission, the Inquiry must confront now rather than allow to derail hearings later, and it's

134

this: does this Inquiry, as a non—statutory Inquiry, have the tools it needs to obtain the evidence on which an effective Article 3 investigation depends? We appreciate the indication from Ms Dobbin that the Inquiry team has conscientiously kept this under review. Our clients don't call for any conversion at this stage but they don't take a passive position on the issue. Our submission is calibrated but no less firm.

The limits of persuasion are not theoretical. They are already visible in this Inquiry. A former minister had disengaged entirely until the Inquiry published an update about his non—engagement. A healthcare provider disclosed just limited documents, most postdating the relevant period, containing sparse patient records, in a matter engaging Article 2 investigation into Mr Ahmed's death. We agree and endorse Bhatt Murphy's written submissions that the Article 2 dimension is significant and one that the Inquiry cannot shy away from.

If the Chair needs one more telling illustration of why persuasion alone will not suffice, she needs to look no further than the Ministry of Defence's submissions for today's hearing. It anticipates delay in obtaining evidence from one of its retired officers precisely because it cannot issue him with employment directions

135

to secure the statement and nor can the Inquiry as things stand. That is the limit of a persuasion—only inquiry, stated in terms. Obtaining witness statements is also only part of the picture. We need to hear from Medevent clinicians, we need to hear from detention custody officers, we also need to hear from the likes of Mr Morris, [redacted] and Commodore Craig to test their evidence in open. The amount of wasted resources and time spent chasing witnesses cannot be repeated.

Therefore, on behalf of Bindmans, Gold Jennings and Wilsons participants, we ask the Chair to continue to keep the question of powers under active and square review and we ask the Chair to signal now to the Home Office and to every material provider in this room that, if cooperation does not materially and promptly improve, she will not hesitate to seek the powers of compulsion that an Article 2 and Article 3 investigation may require. Better that this is confronted now, openly, than to leave it to derail hearings once they're underway.

Even with all this evidence that the Inquiry has obtained and is going to obtain, the ground—level statements, the footage, the first—hand accounts, a question does remain. These witnesses tell you, the Chair, the what and give an insight into the why,

136

but what they cannot do is diagnose whether what happened was the product of institutional culture and racism, and that is the subject of our final and most important submission concerning expert evidence.

Ms Dubinsky has already submitted that the touchstone is what is reasonably necessary and reasonably necessary for a thorough Article 3 investigation and for credible recommendation and the court has already cautioned against being over-zealous in excluding evidence in order to save time and money. Applying that approach, it's our respectful submission that this expertise is reasonably necessary.

Chair, you will of course be in a position to identify incidents of overt racist conduct for yourself, but why did it happen? That requires asking what the institutional response to the misconduct was and what, if any, links can and should be drawn between the leadership demonising migrants and what happened on the ground. This is what requires specialist assistance, in order to uncover the embedded, unwitting and institutional dimension of the conduct.

Counsel to the Inquiry has already pointed out that expert healthcare and causation evidence was needed because those matters lie outside your expertise. The same logic, in our respectful submission, applies to

137

institutional racism and organisational culture. We respectfully say that they do full squarely within the terms of reference because the Inquiry must investigate not only the conditions in which our clients were detained but the decisions, actions and circumstances that led to them. That is the how and why women, babies, victims of torture and other serious forms of violence were treated as less than human, crammed in makeshift tents in winter weather, without bedding, adequate food, running water or medical care.

As Counsel to the Inquiry, Ms Dobbin, rightly acknowledged, the lens is much wider than the Brook House one because the terms of reference for this Inquiry are not focused just on the physical mistreatment of individual detainees. That was the starting point for Brook House. This Inquiry is tasked with uncovering how the design, planning, arrangements, contracting and conditions on the ground led to mistreatment of thousands of people who were unlawfully detained at Manston. The fact that institutional culture and racism are not being separated out as issues is not a reason to refuse expert assistance but the very reason why it is needed. This is because it is the prism through which all evidence must be read.

In their note, Counsel to the Inquiry rightly

138

recognise the overlap between the treatment of those who arrived by small boat and the treatment of racialised groups. That overlap is easy to state but difficult to examine. On Sir William Macpherson's definition of "institutional racism", which this Inquiry has adopted:

"Racism is not confined to deliberate acts. It is the collective failure of an organisation to provide an appropriate and professional service to people because of their colour, culture or ethnic origin, a failure that shows itself in the processes, attitudes and behaviour of an organisation through prejudice, ignorance, thoughtlessness and stereotyping [as read]."

So the question for this Inquiry is not simply whether an individual officer used racist words; it is whether the collective practice and assumptions behind the way people were processed, detained and treated at Manston disadvantaged them because of who they were and whether the same practices and assumptions enabled officers to behave in the way that they did and normalise such behaviour across the board.

Ms Dobbin pointed to evidence of public officials raising concerns with the Home Office and other institutions, but why were their voices sidelined? Why did things not change but get worse? That raises a fundamental question about how an institution behaves

139

from top-down and filtered to the ground level and how voices of dissent were quashed. That, in our respectful submission, is not a question you can safely answer by instinct or from the witness box alone. The strongest reason for this expertise is not theory but it is history, and it is this Inquiry's opportunity to break with that history.

Deborah Coles' witness statement for INQUEST traces this history. Her evidence isn't just a list of separate reports with separate failed attempts at improvement. It reveals a continuous thread of damning findings about a pervasive culture of racism and othering in the immigration system running across two decades, particularly in immigration detention. It begins at Yarl's Wood Immigration Removal Centre in 2004, 22 years ago, findings of racism and racial profiling; it moves on to Oakington in 2005, a sub-culture, in the words of that report, of abusive comment and casual racism and, tellingly, managers escaping accountability while junior officers were disciplined; it runs on to the Mabenga inquest in 2013, not just one or two bad apples but what was described as "pervasive racism" with the contractor and a failure to treat detainees as individuals; the Stephen Shaw Reviews on immigration detention in 2016 and again in 2018,

140

1 finding a culture of disbelief and a persistent gap in
2 the good intentions of policy and the reality of
3 practice on the ground.

4 Then came Brook House in 2023 and a finding of toxic
5 culture and what the Chair described as a "breeding
6 ground for racist views". The findings in her words
7 closely mirrored the findings of reports that had gone
8 before, that I've just mentioned. She described the
9 failure to learn lessons of the past as running through
10 her report like "a dark thread" and called for a culture
11 of change. That was not the end of it.

12 After Brook House came the independent inspectorate
13 reports of 2024 and 2025 on the continued appalling
14 conditions at Brook House and Harmondsworth and the
15 judgment of the High Court of AH and IS, in which
16 systemic breaches of Article 3 were found as recently as
17 2023 and 2024, where the High Court held that the
18 Home Office had known for years that the safeguard in
19 question had not been working.

20 This history matters. It matters because the same
21 dynamics recur: the priority given to enforcement over
22 welfare, the repeated failure to safeguard and the
23 culture of othering detained people. The two
24 investigations that came closest to naming the cause
25 couldn't at the end grapple with it head-on. The

141

1 Windrush Lessons Learned Review found institutional
2 ignorance and thoughtlessness towards race but stopped
3 short of a full institutional racism analysis; the
4 Brook House Inquiry, for reasons of evidence and scope,
5 was not able to examine the role of institutional racism
6 in the pattern of misconduct it uncovered.

7 Those were opportunities lost. This is the position
8 that you, Chair, inherit: two decades of careful
9 investigation, reasons, recommendations and repeated
10 failure to secure lasting change because the underlying
11 cause was never squarely examined. Unlike previous
12 investigations, this Inquiry does have both the evidence
13 and the scope to address institutional culture and
14 racism directly. This is a genuine opportunity which,
15 if not taken, makes the loss so much graver.

16 An expert would draw the strands together to show
17 how the political imperative of enforcement over
18 welfare, the longstanding systems failures in safeguard
19 and a toxic institutional culture combined to produce
20 what happened at Manston. Without access to the
21 expertise on institutional culture and race, there's
22 a real risk that this Inquiry will describe conditions
23 at Manston, make findings about individual misconduct,
24 make recommendations and then take its place on the
25 shelf as one more report whose lessons were never

142

1 learned. That would be a further deeply regrettable
2 lost opportunity.

3 Expert input on institutional culture and racism is
4 how you, as Chair, can move beyond describing what
5 happened to explaining the structural causes so that
6 recommendations can be made which are finally capable of
7 breaking that dark thread. Appointing such an expert is
8 not novel or radical. Macpherson had Dr Robert Oakley;
9 Brook House had Professor Bosworth and
10 Reverend Nathan Ward.

11 Parliament itself recognised the value of experts.
12 That's why section 114(7) of the Equality Act is in the
13 statute book, precisely because of the recognition that
14 racism can manifest itself in ways that are difficult to
15 detect and even judges, experienced judges, need
16 assistance. It is the relevance of that comparison that
17 is raised, not the fact of needing assessors sitting
18 side by side with you.

19 Counsel to the Inquiry has raised concerns, of
20 course, that expert evidence may be expensive,
21 time-consuming, apt to delay, and referred to the terms
22 of reference which state that this Inquiry should hear
23 no more evidence than is reasonably necessary. We
24 answer that in three short points: first, this expert
25 need not delay hearings. A tightly instructed report

143

1 can be prepared in parallel with ongoing disclosure in
2 readiness for a hearing starting in late
3 February/March 2027. The greater delay would be
4 reaching the end of the evidence and only finding then
5 that you, the Chair, doesn't have the sufficient tools
6 to make the necessary finding.

7 Second, this expert is reasonably necessary for
8 effective Article 3 investigation and for
9 recommendations that command public confidence. Economy
10 of course matters but is not the paramount
11 consideration.

12 Third, the cost is modest compared to the costs of
13 getting the answer wrong. Two decades of investigation,
14 reviews, inquests, have produced careful costly findings
15 for no lasting change. If this Inquiry, for want of the
16 right expertise, produces one more report that describes
17 the what but not the why, the real cost will not be in
18 this expert's fees. It will be measured in the next
19 Inquiry and the one after that and then the people who
20 are detained in the meantime. Guarding against that is
21 not an indulgence; it is the most cost-effective thing
22 this Inquiry can do.

23 So for all of those reasons, obtaining an expert
24 input in institutional culture and race will equip you
25 to answer the why and how to stop it from happening. It

144

1 is the difference between an inquiry which describes and
2 an inquiry which changes things.

3 Just a few final closing words. Our clients are
4 really committed to assisting this Inquiry, even at the
5 cost of reliving a deeply traumatic period of their
6 lives. They ask in return that the Inquiry is given the
7 conditions that it needs to work effectively and with
8 reasonable expedition, including, if necessary, the
9 statutory powers. So my clients would like to leave,
10 Chair, with a concrete set of asks.

11 First, fix a listing window of late February or
12 March 2027; second, impose fixed deadlines for
13 outstanding redaction and anonymity applications; third,
14 keep the question of statutory powers under active
15 review and signal that intention now; fourth, direct the
16 Home Office to confirm the undertaking by a short fixed
17 deadline; fifth, seek statements from those who were on
18 the ground and keep further requests open; and, sixth,
19 instruct an expert on institutional culture and racism.

20 This Inquiry matters to my clients but it also
21 matters to a lot of people who may be finding themselves
22 in the same position as my clients because the last time
23 these lessons were set out nothing changed. Our clients
24 ask that this is different; that everyone in this
25 room — not just you, the Chair, or the team — play

145

1 their part in making it so.

2 Unless I can help you any further, those are our
3 submissions.

4 THE CHAIR: Thank you very much indeed. So we'll take now
5 our mid-afternoon break. So can we reconvene in the
6 hearing room, please, at 3.05 and then I'll hear from
7 Ms Harrison King's Counsel. Thank you very much.

8 (2.56 pm)

9 (A short break)

10 (3.10 pm)

11 THE CHAIR: Ms Harrison King's Counsel.

12 MS HARRISON: Thank you very much.

13 Submissions by MS HARRISON

14 MS HARRISON: As the Inquiry knows, I am instructed on
15 behalf of Bhatt Murphy Solicitors, who represent
16 37 individuals who were detained at Manston during the
17 Inquiry period. They are 37 individuals, 22 of whom
18 were unaccompanied asylum-seeking children, wrongly and
19 unlawfully treated as adults throughout their stay, both
20 in those detention facilities and subsequently when
21 released into adult accommodation, as well as three
22 families, which include eight dependent children aged
23 between seven and six months.

24 Bhatt Murphy also act for the NGO Humans for Rights
25 Network which, as the Inquiry knows, was an active NGO

146

1 working on the ground, assisting in particular
2 unaccompanied asylum-seeking children wrongly treated as
3 adults. They have provided their witness statement to
4 you already.

5 We also act and assist INQUEST, who, although not
6 a participant, have provided extensive witness
7 statements, detailed evidence reflecting their special
8 interest and expertise, in particular focusing on the
9 context in which we say will be appropriate to look at
10 and understand the death of Mr Ahmed.

11 Both of those NGOs provide extensive evidence
12 relevant to the critical context in which this Inquiry
13 must undertake its task in making findings of fact, in
14 understanding why this debacle occurred and how and in
15 what way it could be prevented in the future. Their
16 evidence will be critically important and will be
17 relevant for all of the submissions that you've heard
18 today in terms of, in particular, the need for witnesses
19 on the ground and in respect of the importance of an
20 expert on institutional culture.

21 I'm obviously not going to take you to their
22 evidence in any detail. Ms Luh has already identified
23 some aspects of the INQUEST evidence that's relevant in
24 terms of the history. But what we do say — and we say
25 this from the outset — is that it will be and in our

147

1 view is at the heart of and a key explanation for the
2 scandal that unfolded at Western Jet Foil and Manston
3 during the Inquiry period for the Inquiry to make
4 detailed findings on the systemic failure of safeguards,
5 of leadership, of law and policy, and it will only be
6 able to do so if it is fully cognisant of and assisted
7 by those who have expertise in explaining and
8 understanding and identifying where it is that corrupted
9 and toxic institutional cultures and practices which, we
10 will submit and the evidence will demonstrate, pervade
11 all aspects of the Home Office's activities, whether
12 it's from its leadership, its policy decision-making,
13 its planning or lack of planning, its implementation on
14 the ground — are pervaded by what we describe in our
15 written submissions as a "combination of institutional
16 culture that is defined by impunity".

17 Impunity is the starting point. Impunity is the
18 ability of state organs to repeatedly and persistently
19 fail to act upon findings, whether it's by inquiries,
20 investigations, legal cases of widespread illegality and
21 non-compliance with the law. That is what this is
22 a further example of. As Ms Luh has indicated to you,
23 it comes in the context of a litany of further — of
24 longstanding previous findings of widespread unlawful
25 conduct and misconduct by public officials and their

148

contractors that seemingly continues and is recalcitrant despite the very careful extensive findings that have been made over many years as to how this occurred and how it could be remedied.

That is the starting point. It's not just the context in which your task occurs — your task must be undertaken. We start in our opening introductions by emphasising that because it is, we respectfully submit, central to and essential to be the starting point for any decisions that the Inquiry makes about how it is best able to and will not only effectively discharge the duty under Articles 2 and 3 to identify dangerous practices, but also in particular how it will come about in meeting its primary overall function, which is to identify the lessons learned so that those dangerous practices can be remedied and not repeated.

With those opening introductory comments, I can say that, in terms of the points that you have heard already, we adopt the submissions that other IPs have made on, for example, undertakings.

The Inquiry will be aware that Bhatt Murphy have taken a pragmatic approach to providing witness statements and have provided 21 witness statements to date. There are two outstanding. There are some particular complexities to those two but by and large we

149

have now provided the Inquiry with witness evidence. But we do want to make it clear, as others have, that we have done so on the basis that we understand that the Home Office will give those undertakings because they are obviously required, they are reasonable and, as has been said, they are the very same undertakings that were given to other participants, for example, in the Brook House Inquiry.

We fully adopt the observations that have been made about the need for special measures, the very particular context in which this Inquiry takes place and the reasons why special measures will need to be given particular and careful thought for our former detained participants coming to give evidence in conditions that make that, for them, feel effective, comfortable and safe. We welcome the opportunity to give our input onto that, both generally and in individual cases going forward.

On timetable, as Ms Dobbin KC has indicated, there is commonality that matters need to be progressed and that we need to be looking to a hearing in February. We would also underscore the need for there to be a date in the diary for practical reasons of planning of work to be undertaken between now and the Inquiry and to ensure that sufficient time and resources can be available when

150

most needed.

We would also ask that, when the Inquiry sets time limits for contributions, that it takes into account the fact that, for those who represent former detained participants, we have committed to operating cooperatively and collectively to avoid duplication and to divide — to have a sensible division of resources and issues, and you've seen that in action today. But we do wish to emphasise that actually, when it comes to preparation, that takes time. It will ultimately save time and resources for the Inquiry in hearings like this but, for those who are engaged in that task, for it to be done in an effective time without unnecessary pressure does need to be factored into the time limit — to the timetables that are set. That's not a complaint. It's just to indicate that, to be effective, that does need to be factored into how much time. And when we've indicated, for example, in the preparation of these submissions, that more time was needed, it was primarily for that reason, because it does put additional tasks that need to be undertaken.

That being said, then, obviously we rely upon our very detailed written submissions. We don't rehearse those. My task will be to focus on three topics that won't be a surprise to the Inquiry as to what they are,

151

what you've heard already. It is about the status of the Inquiry and whether or not statutory powers of compulsion are now required or, as my learned friend Ms Luh has suggested, ought to be indicated now that they may be needed. We would adopt that as an alternative proposition.

Secondly and importantly is expert evidence. We will make some short submissions on the impact of detention on children, both children — in particular unaccompanied asylum-seeking children and on organisation, culture and institutional racism — but from the perspective particularly of children so as not to repeat what you've already heard, which we also endorse.

Further, I'll deal finally with further witnesses and the witness list.

Issue one, the status of the Inquiry. You've already heard submissions and it's been explained by Ms Dobbin the obstacles that there have been from — presented by some key participants in not cooperating in the way in which the terms of the Inquiry would have expected. The "fullest cooperation" is what the protocol says and you certainly have not had that from former ministers, Mr Wallis and Mr Jenrick, although it's clear that they have now provided witness

152

statements but, inevitably, that caused obstruction and delay to the work and extra work to the Inquiry.

Of course it's already been traversed that there have been significant issues in respect of the provision of evidence, the manner in which it's been provided, issues of disclosure of documents from Medevent personnel. It is in particular our understanding from the notes that we read from the Inquiry that their contribution and/or their failure to fully cooperate gave us the greatest of concern; that being for the obvious reason that they played a vital role in screening at Western Jet Foil and in provision of medical care, in particular obviously their role in the tragic and shocking death of Mr Ahmed in November 2022, as well as in the wider context of the spread of other communicable diseases that could have put other lives at risk as well as serious harm from inadequate or absent appropriate medical care for those held unlawfully in Western Jet Foil and Manston House, including, as we've indicated, many children.

That context did lead us to submit to the Inquiry that the time had come now to seek the powers of compulsion. We propose that for primarily two reasons. One of principle, because of the critical importance of this Inquiry in meeting the Article 2 obligation in its

153

investigation in substitute of an inquest into the death of Mr Ahmed and, two, practicality, because if it becomes clear that greater powers of compulsion are required, it may well be too late and is likely to cause very substantial disruption to any timetable set if that later becomes not just a risk, as we say exists now, but in fact a reality.

So for those two reasons we have advanced the submission that the Inquiry should now seek that — additional statutory powers. Can I say this? Obviously we've considered our submissions in light of the further information that Ms Dobbin indicated about the cooperation of Medevent and its staff, the matters that — and that provides some reassurance. The matters that do cause us continuing concern are that, as well as the failure of full cooperation, what appears to us, at least from the outside, is an apparent lack of understanding of the nature and gravity of their role in the events at Manston — at Western Jet Foil and Manston and in their role in needing to assist the Public Inquiry. It does not appear that they have legal representation. They have not applied to be participants. In that respect, we respectfully suggest that it does not appear that they have grasped the significance of what is expected, given the centrality

154

of their function and role in giving key evidence about in particular the death of Mr Ahmed and that that continued despite service on them of a critical report.

Those gave rise to real concerns that there is a real risk that their cooperation cannot be assumed and, in particular, that it could not be assumed in this context, that they will participate in providing oral evidence. We have obviously made those submissions from an outside perspective and, as I've indicated, the counsel team to the Inquiry is confident that they will fulfil that function in providing oral evidence. If that is your view, Chair, then obviously this is not a situation where there is a real risk to the contrary. However, we do say that that does need to be given ongoing and active consideration because it is only necessary to establish whether or not there is a real risk of non-cooperation without that statutory power.

I accept the submissions that my learned friend made on the legal threshold. It has been a feature in both Articles 2 and 3 cases of the circumstances in which courts have ruled that a — powers of compulsion are necessary and converted non-statutory into statutory inquiries. It was in fact the reason for — or one of the reasons given for the conversion of the Brook House Inquiry into a statutory inquiry even though it only

155

concerned Article 3. That's at paragraph 62(3). So that is a precedent for the evidence in that case indicating that witnesses would not cooperate, justifying or requiring, in order to meet that obligation, that there be the powers of compulsion.

We do observe this, that it's stark that the Home Office make no submissions at all on these questions, despite former senior ministers and key information providers not cooperating to the fullest extent. It shouldn't just rest on individuals, those who represent individuals, to be proactive in raising questions about the compliance with these fundamental obligations. The Inquiry's team is right to emphasise this in the context of the Public Accountability Bill, where the Government is promoting that legislation which will put on a statutory footing duties of candour, transparency and accountability, and that should be informing the Home Office's proactive engagement in ensuring that public officials and those who exercise public functions as a result of contractual arrangements that they make do fully cooperate and participate in these vital public inquiries. Those are my submissions on issue one.

On point two, which is expert evidence, you have already heard submissions from Ms Dubinsky on the

156

question of children. We had made a proposal and we're grateful for an indication from Ms Dobbin KC that that's found favour with them, at least, and we hope that you will adopt that approach. Our suggestion, which has been taken up, is that really the burden should fall again to — in particular to the Home Office to indicate whether or not they do in fact dispute the expert evidence of Dr Fairweather and Dr Given—Wilson. There's absolutely no doubt that they are experts with the highest qualifications in addressing psychiatric impact of detention on children, and that's both children who are unaccompanied asylum-seeking children but also children more widely.

So we would endorse — since we proposed it, obviously we will endorse that that's now seen to be a practical and sensible way forward. There do appear to us to be two options. We would have favoured the Home Office being asked to simply say whether they accept their expert reports in full. That avoids the need for what might be a protracted and complex process of reducing their detailed and nuanced reports into general propositions and that may be something that we can discuss separately. But if that is the way forward, then of course we would want to have an opportunity to look at those observations and can make a speedy

157

timetable in which to do that. We would also observe that not only have we provided expert — a generic expert report on the impacts on the psychiatric welfare of children in detention, but we also have now served with the Inquiry six independent reports, each one documenting the psychiatric and psychological adverse impacts of detention on those individuals.

So it isn't simply that there's a generic report. There are also individual reports that it would be of assistance to know whether any of the findings that those experts have made — and they do include other reports by Dr Fairweather as well as other experts — whether those two are also disputed. Again, that would provide the Inquiry with a practical, expeditious and cost-effective way in which to deal with what we would respectfully submit should be an uncontentious proposition in terms of the impacts recognised to be seriously adverse, even short periods of detention, for children in these kinds of facilities, irrespective and without the grave and appalling conditions that were also attendant at Western Jet Foil and in particular at Manston.

That being said, it's obviously important that the Inquiry is able to make findings not just on the risk of harm but the fact that serious harm occurred to large

158

numbers of highly vulnerable children and in that regard — that's why we say having those reports and having that level of detailed exposition of the gravity of the harm that ensued is important. It goes directly to whether or not there were Article 3 breaches because of the link between deterioration in mental health, in institutions of incarceration, case law being very extensive on that, and so this is a matter that certainly does require expertise, and it goes directly to issues of the terms of reference, the conditions and the treatment and we hope that we've proposed an effective solution to addressing at least that one critical issue.

We should also add that, in addition to the expert reports of Dr Fairweather and Dr Given—Wilson, we've provided a report from an expert — well, a highly qualified expert independent social worker, Ms Josephine Schofield. You've had that report provided to you and we've exhibited it to our submissions. She too gives what we respectfully submit, at least in large part, should be uncontentious evidence about what should have happened to children and what is necessary to safeguard and promote their rights and welfare. Again, that may be something that can be obtained from other sources and by reference to statute and to law, but what

159

you have from Ms Schofield is informed information and advice based upon her extensive and highly qualified social work experience.

There's one issue that I'll come to when we deal with race and institutional culture where there may be more controversy but certainly, as far as what she has said about the disparity and the fundamental disjunct between how children should have been treated and what happened in reality, again, it should be a matter that the Home Office can agree.

One other aspect, turning to the second part of this submission relating to children and institutional culture. It is also correct that Dr Fairweather's report addresses the adverse impact of age assessments — incorrect and, we submit, unlawful age assessments. When you are denied your status as a child, when you are wrongly treated as an adult, when you are mocked and humiliated, treated as a liar and assumed to be not telling the truth about your age, that is something that is core to your identity.

Dr Fairweather, in the psychologist's report, addresses the material — the literature that is available to corroborate the adverse impacts of incorrect age assessments. We say that too is something that should — because it's based upon literature review

160

and it's in fact reflected in case law, in particular on the treatment of children who are denied their identity as children as part of breaches of both Articles 3 and 8 — that too should be something that the Home Office can agree. But it is something we respectfully submit that is — it falls within the purview, obviously, of expert evidence and it is something that this Inquiry should take into account because it's part of the particular adverse impacts of the process of age assessment that was undertaken at Western Jet Foil and followed through while these young people and children were held in Manston and then elsewhere in adult hotel accommodation.

So I want to flag that up because, in our submission, that's an important context for that particular cohort. Where it has other direct relevance to the submissions that you've heard already about the role of institutional culture is multifaceted in some respects because, when one considers the evidence that you now have, both from the NGO Humans for Rights Network and the experience of the individuals, the documentation, all of it demonstrates that what happened at Western Jet Foil in respect of the initial age assessments that were undertaken, that they followed a pattern — although in some respects there was an

161

escalation in the inadequacies of those assessments — but they followed a pattern whereby the Secretary of State's policy either failed to or was implemented in a manner in which failed to reliably identify those who were and those who were not children, to the point that the evidence demonstrates that you were more likely to be wrongly treated as an adult than a child, with less than 50% of decisions being incorrect.

We say the fact that that continued and occurred in this context is evidence of impunity because you'll see, along with many other issues that have been emphasised by Ms Luh, there is longstanding concern, evidence and reports that demonstrate the fundamental failings in the Secretary of State's application of their policy in respect of identifying those who are or are not children. There's systemic non-compliance with the age-assessing policy just as there is systemic non-compliance with other policies and safeguards to protect other forms of vulnerable people, whether that's torture victims, trafficking victims, pregnant women, et cetera. That that was described in the Brook House Inquiry as a complete deprivation of safeguards is again clear and repeated in the evidence that is uncovered by this Inquiry and is typified by the evidence relating to unaccompanied asylum-seeking children wrongly treated as

162

adults.

So we have here an example, affecting a highly vulnerable cohort, of longstanding failure to remedy known illegality. That's impunity and it had direct impacts in this particular context as well.

There is also the fact that what is clear from the evidence that we provided to the Inquiry, both the individual cases and from Humans for Rights Network, is that, in coming to those unlawful and at least incorrect decisions, racial profiling, stereotyping based on racial characteristics, physical and/or demeanour, were used and are integral to the decision-making on age.

There is also clear evidence of the phenomenon known as "adulthoodification", which is well recognised in the criminal justice context and is something that has been the subject of extensive academic and other research — particularly in the United States but it's now recognised fully in the United Kingdom — that children, particularly boys who are black or brown, are treated not as children but instead are ascribed adult motivations — treated not as children but often in the context of racial stereotypes underpinned by notions of disbelief and dehumanisation.

Ms Schofield addresses this in detail in her report as does Ms Harris(?) in her evidence. So in the context

163

specifically of the treatment of children and why it is that so many children ended up in Manston, treated wrongly as adults, race and racial profiling adulthoodification is a critical factor that this Inquiry will have to address. It is only one example of the ways in which dehumanisation, othering and racial profiling — whether that is based on nationality, Albanians associated with criminal conduct, other forms of stereotyping based on racial characteristics, which are evident from the evidence that the Inquiry has already uncovered.

These are matters that are not simply matters that can be drawn on inference. However well qualified the legal chair is — and there's no dispute about that — these are specialist matters which, as you've heard from Ms Luh, Parliament has fully recognised require in other contexts the assistance of those with expertise in identifying and addressing racism, its role in institutional culture and practices and, with the greatest of respect, given that it is clearly in play, we would say centrally in play, for explaining much of what happened, was allowed to happen — was mandated, facilitated or simply allowed to happen at Manston, is informed by these underpinnings of discriminatory dehumanised attitudes to the people who ought to have

164

been protected and who were in the care of the state.

So therefore it is not only relevant to assessing the treatment of children wrongly assessed as adults, it's the critical context in which you will need to address the utter disregard for the rights and welfare of children at all levels — that's both children and those who were disputed children — which is obviously of critical concern to the Inquiry, as Ms Dobbin has said. That is disregard for their rights and welfare at all levels, political, policy planning and implementation. There was clearly a flagrant disregard for child protection and safeguarding duties and obligations. There are graphic examples of othering and dehumanising which meant that so many children were unlawfully held in detention and subject to such appalling conditions.

The Inquiry will be able to identify that this happened but we respectfully submit, without having the expertise and assistance of a race or institutional culture expert, it will not be able to fully and effectively understand and explain why — why it was that these — that from the political leadership down, it was possible to facilitate and permit what can only be properly described as "state abuse of children".

The gravity of that consequence, in my respectful

165

submission, as well as the complexity of the interrelationships between the different forms of corrupted institutional culture, based on objectification, criminalisation and dehumanisation of child asylum seekers and the children of asylum seekers, not treated as deserving of protection, is going to justify as reasonably necessary either to sit with an assessor, as we have suggested, or else to seek the assistance of an expert.

Experts have been identified who could fulfil that role and, as Ms Luh has said, that will give this Inquiry the opportunity not just to uncover the repeated patterns of institutional failure and institutional culture and practices that are underpinned by dehumanisation and racism but give this Inquiry the opportunity to actually provide not just explanation but also then action to bring an end — at least to give the opportunity to bring to an end what has been an ongoing and persistent stain on our public services and, in particular, in the Home Office and the Immigration Service.

That's why we say it's entirely right that this Inquiry should take the opportunity provided to it to address that deficit that has occurred to date in other inquiries; that missing element which we say is critical

166

to understanding all that went wrong or much that went wrong at Manston. So we would endorse the request for an expert in that field.

I have some brief submissions to make on additional witnesses. I'll deal with this as briefly as I can. The Inquiry has already indicated that it will consider — it will pursue a witness statement from Ms Guerin, the special adviser to the Home Secretary. It may be of interest to the Inquiry that the role of special advisers in decision-making on sensitive issues has been the subject of overt criticism already by the judiciary in the context of decisions to deprive individuals of their citizenship. There's a case called "T7" which was heard by the Special Immigration Appeals Commission in 2005. We're at paragraph 30. Mr Justice Robert Jay, the chair of SIAC, was highly critical of the involvement of special advisers in sensitive policy decision-making and that may be of assistance to the Inquiry.

In respect of the other additional witnesses that we have advised — that we have suggested, they are in the list of proposed witnesses from paragraphs — sorry — from 8 to 12. Those witnesses are Mr Gareth Hills, Jonathan Baker, Dr Neil Honeyman and Dan Hobbs. The overriding submission for identifying those individuals

167

is that they are at a level within the institution of the Home Office that has not been fully covered by the witnesses that are currently identified and, critically, when one considers their evidence — and obviously we've set this out in detail — each one of them has identified and raised internally the concerns about what was happening on the ground.

So, for example, Mr Gareth Hills, who is the Home Office Senior Director for Returns and Detention Operations raised with the Home Office the concerns about what was happening, but what he said was — although his advice was sought, it was repeatedly overridden. We respectfully submit that having a witness who has given evidence — who has given advice as to the fact that what was happening would be unlawful but has been disregarded is important.

First it's important from the fact of why he came to that view and when, and it was early on, but it would also be helpful to have his understanding of why it is that his advice was overridden. He will be able to give you the kind of granular detail that will help you to assist in this culture and ethos of impunity; why it is that there are voices within the institutions that raise concerns, raise issues of illegality, but nevertheless are disregarded. That's an important question that has

168

1 been identified and you're not going to get the answers
2 from the corporate witnesses but you may get it from
3 those who have raised those concerns and those concerns
4 have not been acted upon.

5 Similarly, there is Mr Jonathan Baker, who was the
6 assistant director and health and safety manager. He is
7 number nine on the list. He's referred to in
8 Mr Ridley's witness statement. He has a key role in
9 identifying concerns at the time. He said it would not
10 be safe to house anyone and, once again, despite his
11 expertise and his role, his assessments were utterly
12 disregarded. He too will be able to give insight into
13 how, in an institution that sets up a function to
14 identify risks, when those risks are identified, they're
15 simply ignored.

16 We have also suggested that you seek evidence from
17 Mr Dan Hobbs. He's number 11 on the list. He's
18 referred to in Simon Ridley's witness statement. He
19 gave evidence to the Home Affairs Select Committee on
20 26 October 2022 alongside the manager — the Manston
21 senior responsible officer and the director general for
22 customer services. Mr Hobbs informed the Home Affairs
23 Select Committee that Manston was neither overwhelmed
24 nor under-resourced and that any period of detention is
25 as brief as possible.

169

1 We respectfully submit that this misleading and
2 incorrect evidence given to a parliamentary committee is
3 something that the Inquiry should hear evidence about
4 and, again, may assist in understanding how it can be
5 that corrupted cultures of impunity, of avoidance of
6 responsibility, are embedded within the Home Office.
7 That's why we have suggested he would be of assistance.

8 Finally, we've suggested two other individuals,
9 Ailish King—Fisher and Joy Johnson, who were both deputy
10 directors of Resettlement Asylum Support and the
11 Integration Office and they too give evidence about
12 alternatives that were being considered and how they
13 were blocked by ministers. Again, it's a different
14 perspective and an informed perspective from individuals
15 trying to provide alternatives and why they were
16 blocked.

17 So that's the theme that we say reflects some
18 missing evidence that the Inquiry would certainly
19 benefit from and will be necessary to have
20 a comprehensive understanding of not just what was
21 happening because they raised concerns but also why
22 their concerns were rebuffed.

23 Finally in this respect, we have suggested on behalf
24 of Bhatt Murphy that there are witnesses who are more —
25 who are properly described as "front-line staff".

170

1 You've heard submissions about why front-line staff are
2 important. I would certainly endorse that they provided
3 key and critical evidence, the most revealing evidence
4 about institutional culture in the Brook House Inquiry,
5 and what we have proposed is two categories of
6 decision-maker who would be important to hear evidence
7 from. We have been able to identify individuals from
8 the notes and the information that we have, so it is
9 possible to do so. We've selected them on the basis
10 that two had roles in age assessments, that's Mr —
11 that's Immigration Officer Adams, and also an
12 immigration officer, Charlotte Marsh, both of whom
13 conducted a number of age assessments on our clients
14 and, within those age assessments, they contained the
15 kind of racial profiling that we've identified is
16 a critical feature of age decision-making and, for
17 example — just to give one example, in the age
18 assessment of one of our clients, BM, the age assessment
19 report talked about certain features not being those of
20 Eritrean children and they give evidence — indications
21 of that form of ethnic or racial-based profiling that is
22 of such concern.

23 We've also identified two immigration officers who
24 made detention decisions, and whilst of course it's
25 clear from the widespread disclosure that there was

171

1 a fundamental failure at the most basic level to make
2 lawful decisions on age and to provide correct
3 documents, we also have evidence that — not just of the
4 chaotic failures but also of deliberate misleading
5 information in later records.

6 That, we say, can be addressed by asking witnesses
7 how that came to be, how come it is that these
8 immigration officers were failing in their most basic
9 and fundamental duties, when they were authorising the
10 deprivation of liberty of vulnerable individuals. We do
11 say and endorse that that kind of evidence will be of
12 assistance to the Inquiry. That kind of granular
13 explanation for why it was that there was disregard for
14 even the most basic of procedural protections we
15 respectfully submit will be of importance to the
16 Inquiry's task.

17 Finally then, in respect of witnesses who we
18 respectfully submit should be considered to give
19 evidence, I'm going to make very brief submissions on —
20 there are four individuals, Michelle Jarman,
21 Matthew Drinkwater, Penny Button and Sarah Hammond. The
22 reason why we say that these individuals ought to give
23 evidence — we've given detailed reasons in our request,
24 but we do say that it's important to get outside
25 analysis of what was happening here.

172

1 So Michelle Jarman is employed by His Majesty's
 2 Inspectorate. She described the operation of Manston as
 3 unlawful, unregulated and as an unsafe place for —
 4 unsafe as a place of detention. Hers is one of the
 5 starkest contemporaneous external assessments of the
 6 site's illegality and it would be important to ask her
 7 how she came to make that assessment, but also, more
 8 particularly, again, the fact that she has raised that,
 9 what was the response. That again is going to be
 10 a critical issue. This is an oversight body whose
 11 advice is simply disregarded.

12 We similarly say that if you look at what was
 13 identified by Mr Drinkwater, who was employed by NHS
 14 Kent and Medway Integrated Care Board, an independent
 15 body with oversight duties, they identified that the
 16 manner in which children were being held contravened
 17 their rights under the UN Convention on the Rights of
 18 the Child, described children sleeping on mats in
 19 unheated damp accommodation and at risk of diphtheria.
 20 That information was provided. It's referred to by
 21 Mr Ridley. He will be a source of helpful information
 22 but also it would be important to understand how that
 23 oversight body was disregarded. What do they think as
 24 to why — what should have happened and in fact what did
 25 happen when they raised those very real concerns.

173

1 That's the similar position with Ms Button, who
 2 works for Thanet District Council, who is an
 3 environmental health inspector.

4 Finally — and we say this is of particular
 5 importance — we have identified Ms Sarah Hammond, who
 6 was the corporate director for adult social care and
 7 health at Kent County Council. She has a particular and
 8 relevant role in respect of the provision of
 9 accommodation and the treatment of children, in
 10 particular unaccompanied asylum-seeking children.

11 We would submit that the interrelationship between
 12 Kent County Council and the Home Office is one of the
 13 key aspects of understanding issues relating to the lack
 14 of provision of accommodation. We have set out in our
 15 written submissions how arrangements between the
 16 Home Office and Kent have been found by the High Court
 17 in 2023 to have been unlawful. They were based upon
 18 Kent's refusal, shutting its doors, "We are no longer
 19 going to accommodate those that we have a statutory duty
 20 to, who arrive in Kent" — that resulted in the
 21 Home Office agreeing to unlawful provision of
 22 accommodation of children in hotels with really serious
 23 safeguarding consequences. Understanding the dynamics
 24 and the arrangements between Kent and the Home Office in
 25 the treatment of unaccompanied asylum-seeking children

174

1 and why it might be that so many were wrongly treated as
 2 adults during this time we say is an important question
 3 and investigation and inquiry that should be undertaken
 4 and justifies hearing oral evidence from Ms Hammond so
 5 that she may be questioned about some of those topics.

6 Those are all the submissions that I have.

7 THE CHAIR: Ms Harrison, thank you so much for your
 8 submissions.

9 Can I thank everyone for their collaboration and
 10 cooperation with the hearing today? I want to formally
 11 thank my Inquiry team for all of their efforts to date
 12 but in particular the considerable efforts that have
 13 been undertaken in advance of the hearing today and the
 14 wider support that's been provided for the effective and
 15 efficient hearing that has been conducted today. I'm
 16 particularly grateful to the secretariat alongside
 17 Counsel to the Inquiry and the Inquiry legal team.

18 Thanks to be given to the ushers also and the Opus
 19 team but also to the hearing centre for accommodating us
 20 today at this second preliminary hearing.

21 I indicated at the outset of the hearing the
 22 submissions that I had noted that all Inquiry
 23 Participants want the Inquiry to start as soon as
 24 possible in the New Year and I make clear that the aim
 25 is in due course to issue determinations and directions

175

1 in respect of all of the submissions I've heard today
 2 but in particular to fix the final hearing date of the
 3 substantive hearing.

4 Having considered the submissions and in particular
 5 the need to act with expedition to enable those final
 6 directions, determinations and the start date to be
 7 formally given, in my view it's important today to make
 8 some directions to enable the issue in respect of the
 9 generic expert reports that relate to children in the
 10 hope to resolve those issues quickly. But I make clear
 11 what I'm seeking to do today is to ascertain quickly the
 12 position on what is agreed in relation to those generic
 13 reports rather than those that relate to individual
 14 children.

15 So today I'm going to make the following directions.
 16 I direct as follows, that by next Tuesday, 29 September,
 17 the Inquiry legal team will circulate a draft list of
 18 conclusions extracted from the generic reports, namely
 19 the joint report of Dr Susannah Fairweather,
 20 Dr Zoe Given-Wilson and Dr Gillian Hughes. I'm going to
 21 then make a further direction, that seven days
 22 thereafter, so by 6 October, the Home Office is to
 23 indicate if they accept the reports in full, and that's
 24 the generic reports, but, if not, whether they agree the
 25 Inquiry legal team's summary.

176

1 Then, in addition, I'm going to make further
2 directions that will apply to all Inquiry Participants,
3 that the Inquiry Participants will have until Wednesday,
4 7 October to indicate whether there are conclusions with
5 which they do not agree or conclusions that they
6 consider ought to be included following on from CTI's
7 note. Further, that the Inquiry will then circulate
8 a final draft by Tuesday, 13 October and, finally,
9 Inquiry Participants will also have until 4.00 pm on
10 Monday, 19 October to then indicate if these are agreed.
11 Those directions will be drawn up today and circulated
12 to all Inquiry Participants.

13 But I also want to make clear that I'm going to make
14 further directions that will be issued on Tuesday of
15 next week, so 29 September, and by way of headlines,
16 those general directions that will be issued on Tuesday
17 of next week will make a direction to ensure that all
18 relevant CCTV, phone footage or body-worn video is
19 provided and it will also make a direction indicating
20 the date when any further application for anonymity or
21 redaction is to be made by.

22 Further still, I'm going to write to the
23 Home Secretary, the Right Honourable Shabana Mahmood, at
24 the beginning of next week, again asking for a response
25 to the letter I wrote following submissions in respect

177

1 to the issue of an undertaking and asking for a response
2 to my letter dated 7 July 2026 in order hopefully to
3 have the response to the undertaking request that I've
4 made. And, in particular, no doubt it's clear as to why
5 a response is needed, having heard the submissions that
6 have been ventilated orally today.

7 So the written directions I've just made that
8 apply — that I've made will be drawn up and issued
9 today but, as I've already indicated, there will be
10 further directions that will be issued on Tuesday
11 because plainly those matters are going to be needed for
12 me to resolve and issue then the directions and
13 determinations following all of the submissions I've
14 heard today, which will then enable me, as soon as
15 possible, to indicate and fix the date for this final
16 hearing.

17 Can I end this hearing again by thanking everyone
18 for their hard work, the assistance but also for
19 everyone's assistance in what has been an incredibly
20 helpful and productive hearing this afternoon.

21 MS DOBBIN: Before you go, Chair, there is just one very
22 short matter. Can I pick that up, please? In her
23 submissions, Ms Harrison King's Counsel set out some
24 concerns about Medevent, and that included that Medevent
25 had been served with the expert report and in light of

178

1 it hadn't applied to be an Inquiry Participant.

2 I just wanted to make sure there was clarity about
3 that in case there is some misunderstanding. They
4 weren't served with the report because it's a draft
5 report. It was explained to them that, if they wanted
6 to have input into the report, they would need to apply
7 to be Inquiry Participants but they were given some
8 information about the report. So I just wanted to make
9 that clear in fairness to Medevent, that that was the
10 position.

11 THE CHAIR: Thank you. Thank you for that helpful
12 clarification.

13 Does anything else arise, Ms Dobbin, from the
14 directions I've just made?

15 MS DOBBIN: No.

16 THE CHAIR: I'm particularly grateful to you and Ms Moffatt
17 for your efforts for essentially putting a framework on
18 the hearing today. I'm very grateful to you both.

19 I wish everyone a restful weekend and I hope anyone
20 who has missed out on lunch or refreshments has
21 sustenance waiting. I think there's some rather good
22 biscuits on the island. That concludes this hearing.

23 Good afternoon.

24 (4.09 pm)

25 (The hearing concluded)

179

INDEX	
1	Introductory remarks by THE CHAIR 1
2	Submissions by MS DOBBIN 3
3	Submissions by MS MOFFATT 71
4	Submissions by MS DUBINSKY 83
5	Submissions by MR NICHOLLS 102
6	Submissions by MS LUH 124
7	Submissions by MS HARRISON 146
8	
9	
10	
11	
12	
13	
14	
15	
16	
17	
18	
19	
20	
21	
22	
23	
24	
25	

180

A						
abigail (1) 81:13	ad (1) 20:18	afternoon (3) 101:14 178:20	129:4,9,12 130:11,24	apologise (2) 70:20 116:3	arrived (7) 26:24 38:18	attend (4) 32:19 33:11 35:3
ability (8) 31:9 37:15,17	adams (1) 171:11	179:23	135:10 137:5,9,22	appalling (5) 14:4 16:21	52:19,23 55:24 131:1	38:13
46:16 58:25 85:22 106:4	add (9) 40:17 75:4 76:21	afterwards (2) 63:22 77:10	147:4,22 149:19	141:13 158:20 165:16	139:2	attendance (1) 33:19
148:18	77:13 100:8 103:7 104:16	again (33) 7:9 16:10 22:17	152:1,13,18 153:3 156:25	apparent (9) 20:22 26:16,22	arriving (1) 72:21	attendant (1) 158:21
148:18	108:7 159:14	27:10 45:21 46:8 47:15	161:17 164:11 167:6,11	27:20 40:2 43:2 120:6	article (33) 32:8,13,16	attended (1) 1:6
148:18	added (6) 5:5 14:13 80:12	53:7 60:12 61:3,17	178:9	122:4 154:17	33:17,17,21,22,23 34:1	attendees (1) 61:11
148:18	115:20 116:19 119:22	64:21,24 66:20 74:6 75:6	also (95) 1:10 3:4 6:8 13:9	apparently (1) 47:13	38:7 50:21,21 90:3,6,10	attention (3) 105:25 115:3,5
148:18	addendum (1) 54:22	77:14 116:18,20 129:13	16:19,25 19:1 28:17 29:25	appeals (1) 167:14	94:16,25 124:21 126:5,8	attitude (1) 23:24
148:18	addition (6) 12:16 48:23	140:25 157:6 158:13	30:11,25 34:21 36:12	appear (7) 52:11 120:8,21	130:23 131:17 135:3,15,17	attitudes (4) 13:8 47:24
148:18	86:1 89:13 159:14 177:1	159:23 160:9 162:22	37:25 43:18,25 44:2,4,16	124:6 154:21,24 157:16	136:17,17 137:7 141:16	139:10 164:25
148:18	additional (14) 4:5 5:3,5	169:10 170:4,13 173:8,9	47:18,19,25 49:16 57:23	appearance (2) 12:6 97:8	144:8 153:25 156:1 159:5	attract (1) 17:15
148:18	69:14 70:12 71:7 77:12	177:24 178:17	60:18 63:3,4 69:3 73:10	appeared (3) 38:24 42:25	articles (4) 51:7 149:12	attributable (1) 117:25
148:18	80:21 81:15 83:7 151:20	against (8) 24:15 36:12 45:7	86:4 87:19 88:10 89:4	80:8	155:20 161:3	audio (1) 101:17
148:18	154:10 167:4,20	54:7 111:18 119:25 137:9	90:20 92:25 94:21 96:3	appears (18) 16:18 37:6 38:2	asap (1) 106:17	auditing (1) 121:17
148:18	additionally (4) 51:1 73:1	144:20	98:20 99:25 100:8	41:25 43:18 44:2 47:4	ascertain (4) 36:9 74:1 96:18	august (3) 30:4 56:2 79:2
148:18	81:7 82:23	age (19) 49:17 77:17,22,25	101:6,14,16 103:18 105:20	49:20 51:5 54:11 55:13	176:11	author (3) 10:25 77:2,12
148:18	address (33) 2:3 8:1 24:13	99:19 160:14,15,19,24	109:3,23 113:2,7 114:23	58:13 59:23 63:12,16	ascribed (1) 163:20	authorised (2) 63:15 120:18
148:18	45:1 70:16 71:2,10 74:12	161:10,23 163:12	116:9 117:11 120:8,20,25	82:16 83:4 154:16	ashley (1) 41:18	authorising (1) 172:9
148:18	84:7,11,13,24 86:23 89:23	171:10,13,14,16,17,18	121:16 122:12 123:17	append (1) 34:19	aside (1) 36:2	authorities (1) 59:16
148:18	90:19 92:11 93:22 95:17	172:2	132:15 133:10 136:4,6	apples (1) 140:22	ask (17) 24:12 31:20 51:8	authority (1) 50:24
148:18	100:3 101:4,13 102:13	ageassessing (1) 162:17	145:20 146:24 147:5	application (7) 29:17 30:3,9	61:11 86:19 100:19 101:1	autumn (2) 10:9 111:1
148:18	111:3,22 115:14 117:1	aged (2) 24:18 146:22	149:13 150:22 151:2	105:13 109:23 126:19	availability (1) 117:22	availability (1) 117:22
148:18	121:10 124:23 131:22	agenda (2) 2:3 92:5	152:13 157:12	applications (14) 30:21 86:2	131:19 136:11,13 145:6,24	available (11) 6:22 11:16
148:18	142:13 164:5 165:5 166:24	aggression (1) 56:9	158:1,4,9,13,21 159:14	103:5 104:1	151:2 173:6	19:13,18 21:13 26:5 34:11
148:18	addressed (10) 93:20 103:4	ago (2) 42:12 140:16	160:13 163:6,13 166:17	107:11,13,15,18 117:17	asked (21) 15:2 22:12 31:3	36:7 66:4 150:25 160:23
148:18	110:5,16 115:11 116:25	agree (15) 1:17 54:4 94:1	168:19 169:16 170:21	126:21 128:15,22,25	35:16 37:5 38:10,22,23	avert (1) 94:13
148:18	123:9 128:16 134:20 172:6	99:4 107:12 115:17,21	171:11,23 172:3,4	145:13	43:12 48:24 57:6 62:20	avoid (2) 37:24 151:6
148:18	addresses (4) 107:22	116:20 120:7 128:23	173:7,22 175:18,19	applied (5) 30:2 43:7 93:25	64:18 65:15 69:21 70:8	avoidable (1) 128:18
148:18	160:14,22 163:24	135:16 160:10 161:5	177:9,13,19 178:18	154:22 179:1	90:15 121:10 129:16 134:3	avoidance (1) 170:5
148:18	addressing (6) 9:3 85:5	176:24 177:5	alternative (2) 89:2 152:6	applies (5) 49:22 50:17	157:18	avoiding (1) 96:22
148:18	115:10 157:10 159:12	agreed (7) 53:21,22 70:4	alternatives (3) 90:21	60:21 112:10 137:25	asking (5) 27:8 137:15 172:6	avoids (1) 157:19
148:18	164:18	84:17 117:20 176:12	170:12,15	179:6	177:24 178:1	await (1) 119:7
148:18	adequacy (3) 26:5 36:5	177:10	although (7) 26:3 88:23	114:5 121:21 177:2 178:8	asks (1) 145:10	aware (11) 17:6 45:25 50:24
148:18	89:15	agreeing (1) 174:21	99:21 147:5 152:24 161:25	179:6	aspect (2) 27:6 160:11	56:21 59:6 75:25 77:3
148:18	adequate (5) 15:18 16:1	agreement (1) 86:23	168:12	applying (1) 137:11	aspects (7) 36:24 42:24 64:3	91:11 111:9 123:3 149:21
148:18	50:10 127:24 138:10	agrees (1) 39:9	always (1) 94:5	appoint (1) 61:21	103:23 147:23 148:11	away (2) 125:23 135:18
148:18	adequately (2) 132:10	ah (1) 141:15	ambition (2) 30:16 39:14	appointed (1) 4:6	174:13	
148:18	133:11	ahmed (25) 4:10 20:2,7	among (6) 42:24 76:2 99:22	appointing (2) 60:19 143:7	assault (1) 13:22	
148:18	adhered (1) 64:15	24:17,18 25:11	108:7 109:2 116:7	appreciable (1) 73:6	assess (1) 60:11	
148:18	adjourment (3) 100:20	26:4,17,22,25 27:13,17	amongst (8) 7:16 11:24	appreciate (3) 40:24 55:1	assessed (2) 37:20 165:3	
148:18	101:1 102:1	31:17 34:1 38:8,24	15:16 24:24 32:17 47:21	135:4	assessing (2) 16:6 165:2	
148:18	adjust (1) 55:3	62:12,19 65:17,22 128:3	49:21 79:8	appreciated (1) 21:21	assessment (12) 15:3 33:20	
148:18	admitted (1) 95:6	147:10 153:14 154:2 155:2	amount (7) 29:7 32:2 105:20	approach (14) 51:6 59:1	38:3 52:22 54:7 62:18	
148:18	adopt (5) 118:13 149:19	ahmeds (7) 25:13,25 26:9	108:12 109:5 124:17 136:8	69:19,22 94:2,24	77:17,23 161:10 171:18,18	
148:18	150:9 152:5 157:4	27:6 36:24 50:8 135:16	analogy (1) 60:20	109:14,17 110:6 117:12	173:7	
148:18	adopted (1) 139:5	aid (1) 93:12	analysed (1) 108:19	119:1 137:11 149:22 157:4	assessments (13) 49:18	
148:18	adopting (1) 53:25	aillish (1) 170:9	analysis (2) 142:3 172:25	approached (4) 17:3 86:18	53:10 77:25 160:15,16,24	
148:18	adult (6) 146:21 160:17	aim (2) 106:15 175:24	andor (2) 153:9 163:11	91:20 117:10	161:24 162:1 169:11	
148:18	161:13 162:7 163:20 174:6	aiming (1) 1:18	andy (1) 132:25	appropriate (9) 19:12 23:17	171:10,13,14 173:5	
148:18	adulterification (2) 163:14	air (1) 122:8	animus (1) 46:11	27:13 55:6 114:6 118:10	assessor (4) 58:24 60:20,24	
148:18	164:4	aired (1) 3:8	annex (13) 86:16,17,19,20	139:8 147:9 153:18	166:8	
148:18	adults (11) 15:1 16:12 17:13	airways (1) 94:3	90:11 114:22,24	appropriately (1) 109:14	assessors (2) 60:25 143:17	
148:18	52:8 129:25 146:19 147:3	alarm (1) 22:19	115:2,11,21 116:2,17,21	approximately (6) 56:1,3	assist (26) 1:12 9:5 20:7	
148:18	163:1 164:3 165:3 175:2	albanian (1) 56:2	annexes (1) 114:22	97:23 99:14,17 106:14	23:4 53:18 54:4 60:25 65:3	
148:18	advance (9) 2:7,11 4:14 6:12	albanians (1) 164:8	announcement (1) 88:11	april (4) 65:14 66:12 104:11	69:10,11 70:17 73:5 74:20	
148:18	14:20 40:11 105:22 117:17	albeit (1) 109:5	anonymity (10) 30:6,21 43:7	123:8	76:22 77:14 78:21 106:5	
148:18	175:13	alive (2) 33:24 105:20	47:18 107:11,16 126:22	apt (1) 143:21	121:10 123:6,15 134:15,17	
148:18	advanced (2) 113:13 154:8	allegation (1) 62:2	128:14 145:13 177:20	area (6) 50:2,5 72:8 77:19	147:5 154:20 168:22 170:4	
148:18	advancing (1) 83:21	allegations (14) 7:17 12:5	another (9) 13:24 14:4	96:12,13	assistance (19) 1:7 43:10	
148:18	advantageous (1) 37:14	13:20 14:7 16:10 29:6	16:3,22 24:6 43:17 77:19	areas (3) 19:23 50:6 52:1	50:4,7 51:13,16 64:25	
148:18	adverse (5) 158:6,18	45:14 46:1 48:22 49:5	80:10 104:3	arent (4) 53:16,22 67:10	137:19 138:22 143:16	
148:18	160:14,23 161:9	61:24 62:1 67:9 112:1	answer (14) 7:2 43:1 50:11	112:21	158:10 164:17 165:19	
148:18	advice (12) 6:14 76:11 92:24	allege (1) 45:16	51:9 90:16 113:20 115:25	arguably (1) 119:19	166:9 167:18 170:7 172:12	
148:18	93:3,9,13 115:22 160:2	alleged (2) 13:22 61:3	129:6,11,12 140:3 143:24	argued (1) 57:17	178:18,19	
148:18	168:12,14,20 173:11	alleviate (1) 116:15	144:13,25	argument (1) 110:9	assistant (1) 169:6	
148:18	advise (1) 7:7	allocated (1) 2:7	answered (3) 46:23	arguments (2) 45:7 67:12	assisted (2) 121:12 148:6	
148:18	advised (1) 167:21	allow (1) 134:25	133:11,21	arise (7) 3:9 21:23 38:25	assisting (3) 104:23 145:4	
148:18	adviser (2) 75:11 167:8	allowed (3) 67:14 164:22,23	answering (1) 31:4	56:4 58:3 59:3 179:13	147:1	
148:18	advisers (4) 75:15,18	allowing (1) 89:8	answers (5) 43:1 49:6 127:18	arising (2) 78:5 80:21	associated (1) 164:8	
148:18	167:10,17	allows (2) 3:2 112:9	133:7 169:1	arms (1) 132:12	association (1) 133:1	
148:18	advises (1) 7:4	alluded (1) 62:12	antennal (1) 128:7	arora (1) 78:7	assortment (1) 52:13	
148:18	advocates (1) 101:13	almost (4) 28:15 29:3 32:1	anthony (1) 116:3	aroras (2) 78:10,12	assume (1) 14:17	
148:18	aeromed (4) 18:12,14,17	39:12	antibacterial (1) 11:16	arose (1) 44:3	assumed (3) 155:5,6 160:19	
148:18	35:20	alone (6) 89:9 112:23 127:3	antibiotics (1) 27:19	around (12) 17:13 25:3	assuming (1) 36:12	
148:18	affairs (4) 17:23 91:4	133:12 135:21 140:4	anticipate (4) 97:24 108:24	27:1,2 39:24 47:7 72:8,15	assumption (1) 15:7	
148:18	169:19,22	along (3) 124:6 130:12	117:19 118:24	75:22 82:25 106:1 124:1	assumptions (2) 139:15,18	
148:18	affect (1) 84:5	162:11	anticipated (1) 106:1	arranged (2) 54:17 76:16	assurance (1) 13:17	
148:18	affecting (2) 102:14 163:2	alongside (6) 2:23 48:8 52:8	anticipates (2) 99:17 135:23	arrangements (10) 2:25	asthma (1) 128:8	
148:18	afforded (1) 20:5	98:9 169:20 175:16	anxiety (2) 99:23	15:10 19:19 74:12 117:24	asylum (12) 15:11 63:2 72:3	
148:18	afield (1) 3:11	already (49) 29:12 30:6	anxious (1) 127:20	118:13 138:17 156:20	146:18 147:2 152:10	
148:18	afraid (1) 133:3	43:16 48:16 50:14 53:2	anyone (4) 27:20 126:14	174:15,24	131:2,7 166:5,5 170:10	
148:18	after (15) 4:1 11:12 26:12	55:13 56:7 57:11 59:24	169:10 179:19	arrival (1) 18:25	asylumseeking (8) 96:4	
148:18	29:13 30:23 31:4 36:18	64:4 73:15 75:1 81:9 85:17	anything (6) 3:8 9:14 24:13	arrivals (9) 5:14 10:1 23:25	157:12 162:25 174:10,25	
148:18	41:25 61:9 84:23 107:17	89:17,23 90:13 91:1,20	48:25 70:17 179:13	35:14 55:20,23 56:2,4	atmosphere (1) 132:24	
148:18	115:3 123:20 141:12	92:17 100:11 105:9 107:16	apologies (1) 92:14	87:23	attempts (2) 46:3 140:10	
148:18	144:19	109:24 115:11 128:16		arrive (2) 46:12 174:20		

76:12 77:10 97:4 102:21,23 111:7 122:14 123:25 129:11 141:8 178:21 began (1) 18:13 begin (3) 39:15 40:4 125:11 beginning (2) 3:21 177:24 begins (1) 140:15 begs (2) 62:14 125:20 behalf (36) 2:12,14,17 4:11,20 5:8,10 17:2 31:10 32:5 41:7 42:7,11,17 45:6 49:15 50:20 52:4 53:2 70:13 83:16,25 84:2,21 96:24 102:5,22 103:7 104:4,10 123:23 124:6 130:6 136:10 146:15 170:23 behave (1) 139:19 behaves (1) 139:25 behaviour (5) 13:9 47:7 103:9 139:11,20 behind (3) 10:2 29:8 139:15 behindthescenes (1) 85:3 being (64) 3:1 11:15 12:14 14:4,5,8,9 18:9 21:10,25 28:11 31:7 37:13 38:22,23 45:17 54:9,10 55:17 59:4,22 60:22 61:16,25 62:1,1,2,2 66:7 74:1 78:8 91:14,15 92:12,21 97:4 99:18 103:20 109:17,10,10,24 111:13 113:18 120:3,4,5 123:9 128:4,11 129:13,16 137:9 138:21 151:22 153:10 157:18 158:23 159:7 162:8 170:12 171:19 173:16 belatedly (1) 30:1 beliefs (1) 58:5 belies (1) 28:3 believe (4) 82:22 92:18,25 102:8 below (1) 42:16 beneficial (1) 77:20 benefit (2) 91:3 170:19 benfield (1) 124:6 best (9) 7:7 72:23 79:12 100:3 112:8 113:1,5 118:6 149:11 better (4) 80:11 127:10 128:19 136:18 between (22) 20:19 42:1,23 44:8 56:20 84:6,16 85:10 96:17 126:9 133:9 137:17 139:1 145:1 146:23 150:24 159:6 160:8 166:2 174:11,15,24 beyond (5) 22:4,13 76:24 117:15 143:4 bhatt (11) 2:18 32:5 49:15 53:14 82:23 101:3 135:16 146:15,24 149:21 170:24 bid (1) 74:18 bill (1) 156:14 bindmans (5) 2:16 123:24 124:8 130:11 136:10 biscuits (1) 179:22 bit (1) 129:4 bites (1) 11:17 black (1) 163:19 blankets (1) 23:6 block (2) 11:2,8 blocked (3) 116:9 170:13,16 blocks (1) 10:17 blue (1) 41:18 bluntly (1) 22:9 bm (1) 171:18 board (3) 118:17 139:20 173:14 boat (13) 5:14 10:1 15:6 23:25 35:13 46:12 55:20,22 56:2 72:22 87:23 131:2 139:2 boats (4) 5:11 55:25 87:13 90:19	body (4) 17:24 173:10,15,23 bodyworn (7) 16:14 65:12,16,20,23 66:7 177:18 boiled (1) 52:16 book (1) 143:13 border (2) 16:15 120:12 borders (4) 15:8 80:15 81:11 115:18 bore (1) 87:24 boris (2) 71:13,22 bosswell (1) 47:20 bosworth (2) 58:19 143:9 both (36) 14:24 17:8 20:5 27:12 34:6,23 42:25 43:19 50:10 72:22 84:5 87:16,21 88:12 89:1,3 94:19 96:10 102:18 107:1 113:15 120:13 142:12 146:19 147:11 150:17 152:9 155:19 157:11 161:3,20 163:7 165:6 170:9 171:12 179:18 bound (1) 8:16 box (1) 140:4 boxes (1) 15:21 boy (1) 16:4 boys (1) 163:19 braverman (1) 88:1 bravermans (3) 88:21 89:9 91:9 brazenly (1) 133:19 breach (1) 74:2 breaches (5) 9:22 90:10 141:16 159:5 161:3 breadth (1) 6:24 break (11) 54:25 55:2,3 61:9,11,14 101:22 124:2 140:6 146:5,9 breaking (1) 143:7 breeding (2) 58:13 141:5 brief (9) 3:13 49:20 89:19 97:2 104:4 106:22 167:4 169:25 172:19 briefings (1) 91:14 briefly (14) 2:25 56:16 65:4 66:19 85:13 98:14 102:14,15,21 110:4 115:14 118:18 121:23 167:5 bring (3) 119:12 166:17,18 bringing (1) 109:12 brings (1) 129:3 british (5) 13:6 77:2,5,8 94:3 broad (12) 6:19 45:18 49:20 62:24 64:9 71:11 75:9 102:13 109:14 111:19 112:18 113:22 broadcasting (1) 3:5 broadier (13) 26:4 46:25 47:12 57:4 58:8 59:25 72:17 102:17 121:24 122:3,15,17,20 broadly (1) 57:1 broken (2) 11:5,5 brook (27) 33:16 48:4 57:14,19 58:5,12,13,16 59:2 64:3 85:17 105:12 121:12 129:10 133:22 134:3 138:13,16 141:4,12,14 142:4 143:9 150:8 155:24 162:21 171:4 brought (2) 10:9 27:23 brown (1) 163:19 budget (2) 74:16,18 building (1) 10:25 buildings (4) 10:9 12:20 15:17 19:2 buildup (1) 11:21 bundles (1) 98:8 burden (1) 157:5 busy (1) 105:18 butler (2) 42:19 43:3 butlers (1) 43:10 button (2) 172:21 174:1	c (1) 114:24 cabinet (9) 30:1 73:2,3 74:10 75:8 91:23 92:2,3,5 calibrated (1) 135:8 call (7) 6:13 45:5 54:13 69:5 81:23 112:16 135:6 called (12) 8:23 15:14 62:9 73:25 79:25 80:19,23 82:3 114:23 126:15 141:10 167:13 calling (4) 44:25 45:15 46:7 132:19 callous (2) 13:8 59:21 callrefer (1) 17:21 came (11) 4:10 20:18 36:18 60:9 88:24 141:4,12,24 168:17 172:7 173:7 camera (1) 16:25 cameras (5) 65:11,12,23 66:2 108:10 candid (2) 32:3 129:17 candour (2) 124:11 156:16 cannot (16) 37:22 54:19 79:16 85:19 97:14,16 99:2 104:8 106:3 132:9 133:11 135:18,25 136:9 137:1 155:5 cant (7) 34:22 42:5 47:9 70:4 113:21 131:5,24 capable (4) 59:4 90:9 129:13 143:6 capacity (1) 9:25 capture (1) 101:21 captures (1) 133:8 cardboard (2) 23:5 133:6 care (28) 2:11 11:23 18:14,20 19:3,22 21:1 27:6,13 31:14 34:6,11 36:24 43:22 49:13 54:5 57:4 85:5 119:5 127:19,24 128:7 138:10 153:13,18 165:1 173:14 174:6 careful (7) 114:20 117:9,12 142:8 144:14 149:2 150:13 carefully (4) 12:4 111:21,22 119:6 caretaker (1) 71:15 carried (1) 44:22 carry (1) 131:12 carrying (3) 15:21 63:5 104:23 cars (1) 120:9 cases (9) 25:3 32:11 33:22 72:22 130:4 148:20 150:17 155:20 163:8 casts (1) 131:15 casual (4) 62:4 86:11 120:7 140:19 categories (2) 71:11 171:5 category (2) 59:19 75:9 causation (2) 27:16 137:23 cause (7) 31:9 53:11 103:10 141:24 142:11 154:4,15 caused (5) 22:18 27:14 50:7 133:13 153:1 causes (1) 143:5 caution (1) 36:12 cautioned (2) 95:8 137:9 cctv (4) 65:10 66:14,17 177:18 cdl (2) 73:12,21 cdls (1) 73:16 cell (2) 32:20 79:14 central (9) 74:16 95:1 108:21 109:11 117:15 122:12 124:18 132:7 149:9 centrality (1) 154:25 centrally (1) 164:21 centre (9) 5:19 9:21 87:13 89:3 93:6,10 131:3 140:15 175:19 certain (6) 22:10 30:2 42:16 46:20 124:25 171:19 certainty (1) 117:19 cetera (1) 162:21 chain (3) 47:8 91:15 92:14	chair (100) 1:3,4 3:18 6:15 21:1 28:1 29:16 30:4 34:22 54:25 55:6 57:11,14 58:16,18,23 59:2 61:8,10,16,19 65:1 67:16 70:10,14,19,24 71:2,10 72:11 73:7 74:6,20 75:1,17,24 76:13,18 77:3,11 78:9,15 80:24 81:7,21 82:2 83:14,18,23 86:19 100:18 101:9 102:3,4,7,11,23 104:5 105:17 110:13 111:6,8 112:5,22 116:23 117:12 118:9 123:3,17,22 124:4,6,11 125:24 126:19 129:11 131:19 133:17 134:18 135:20 136:11,13,25 137:13 141:5 142:8 143:4 144:5 145:10,25 146:4,11 155:12 164:14 167:16 175:7 178:21 179:11,16 180:2 chairing (1) 92:1 chairs (2) 124:15 126:12 challenges (2) 37:8 44:2 challenging (1) 7:12 champion (2) 81:16 116:10 chancellor (4) 71:18 73:11 89:13 91:18 change (4) 139:24 141:11 142:10 144:15 changed (2) 28:17 145:23 changes (3) 77:24 131:6 145:2 channel (2) 71:25 91:7 chaotic (1) 172:4 characteristics (2) 163:11 164:9 charged (3) 4:9 48:2 131:4 charity (2) 93:13,13 charlotte (1) 171:12 chasing (1) 136:9 check (4) 18:25 35:17 63:22 74:5 checked (1) 66:12 checking (1) 54:24 chief (2) 80:15 90:12 child (6) 130:7 160:17 162:7 165:12 166:5 173:18 childhood (1) 19:20 children (110) 9:12 10:6,21,25 11:8 12:22 13:10,11 14:19,21,23,24 15:4,13,17 16:2,9,12,16,17 17:7,11 18:1 19:19,22,23 23:5 25:4 49:13,14,18 52:3,5,7,10,11,18,19,22,23 53:3,6,12 54:3,6,9,15,21 60:10 61:25 84:12 93:24 94:25 95:18,23 96:5,6,10 100:22 119:2,5 120:3 122:11 130:1 146:18,22 147:2 152:9,9,10,12 153:20 157:1,11,11,12,13 158:4,19 159:1,22 160:8,12 161:2,3,12 162:5,16,25 163:18,20,21 164:1,2 165:3,6,6,7,14,24 166:5 171:20 173:16,18 174:9,10,22,25 176:9,14 chose (1) 59:22 chronic (1) 128:8 churchill (2) 81:10 115:17 cipher (1) 67:11 circulate (3) 82:4 176:17 177:7 circulated (3) 25:25 30:3 177:11 circumstances (13) 4:10 14:22 25:11 56:19 77:10 97:7 104:9 105:13 107:19 110:10 121:21 138:5 155:20 cite (1) 112:4 citizenship (2) 15:8 167:13	civil (12) 7:14 22:14,20 50:16,17 89:20 94:11 95:4,10,21 98:6 112:3 claims (2) 60:22 95:21 clandestine (2) 42:22 47:4 clarification (2) 130:3 179:12 clarifications (2) 31:4 127:8 clarified (1) 13:15 clarity (1) 179:2 clarke (1) 90:12 clean (1) 10:20 clear (32) 1:16 20:24 21:25 26:20 31:21 35:15 41:6 51:7 66:11 70:10 80:4 87:2 95:24 97:7,10 103:23 105:23 107:12 109:8 130:15 150:2 152:25 154:3 162:23 163:6,13 171:25 175:24 176:10 177:13 178:4 179:9 clearcut (1) 59:20 cleared (2) 29:23 107:5 clearest (1) 133:25 cleareyed (1) 126:19 clearly (7) 14:14 23:12 89:16 91:1 97:13 164:20 165:11 client (1) 126:9 clients (42) 97:23 104:8,10 105:16 106:8 107:24 117:4,5,24 123:7 124:8,13 125:6 126:11,13 127:1,18,24,25 128:9,21 129:16,23 130:17 131:7,9,10,15 132:12,15 133:13 134:1,15 135:6 138:4 145:3,9,20,22,23 171:13,18 clinical (7) 38:11 49:13 50:11 54:12 96:3 119:5 127:23 33:19 34:22 clinician (1) 38:13 clinicians (3) 18:21 34:4 136:5 clips (6) 65:20,25 66:5 108:8,12,17 close (4) 27:24 92:8 106:12 124:1 closely (3) 88:22 93:5 141:7 closing (1) 141:24 closure (1) 145:3 clothes (3) 10:20 11:11,13 clothing (1) 15:22 coauthor (1) 54:20 code (1) 22:14 codes (1) 34:24 cogent (1) 114:14 cognisant (1) 148:6 coherent (1) 20:24 cohort (7) 32:6 84:25 98:15,15 103:7 161:16 163:3 cohorts (2) 84:22 124:7 cold (2) 10:4 18:18 coles (1) 140:8 collaboration (2) 1:7 175:9 collate (2) 98:7,20 collating (1) 64:7 colleague (2) 33:10 44:14 colleagues (2) 33:2 128:16 collective (3) 103:11 139:7,15 collectively (4) 6:13 85:7 86:16 151:6 collegiality (1) 7:10 collier (2) 58:20 121:12 colour (1) 139:9 combination (1) 148:15 combined (1) 142:19 come (23) 6:2,15 14:10,18 17:4 41:15 45:9 49:24 55:6 59:22 60:12 65:9 85:24 87:20 106:7,13 110:25 111:3 134:8 149:13 153:22 160:4 172:7 comes (4) 127:14,21 148:23 151:9 comfort (1) 61:10	comfortable (1) 150:15 coming (4) 30:14 40:8 150:14 163:9 command (1) 144:9 commander (1) 79:11 commence (2) 126:13,16 commenced (1) 11:24 commences (1) 40:21 commencing (1) 124:16 comment (4) 78:5 97:3 98:20 140:19 comments (3) 80:2 98:2 149:17 commission (5) 49:11 50:23 53:25 56:13 167:15 commissioned (5) 51:11 53:2 54:1 96:22 97:18 commitment (5) 1:11 103:24 106:9 124:15 131:16 committed (3) 104:22 145:4 151:5 committee (3) 169:19,23 170:2 commodore (6) 78:18,25 79:3,11 132:18 136:7 common (2) 63:11 98:22 commonality (1) 150:20 communicable (1) 153:16 communicated (2) 10:22 68:18 communications (1) 42:1 community (1) 87:18 companies (1) 18:11 company (2) 31:15,21 compared (2) 73:22 144:12 comparison (1) 143:16 compassion (1) 46:18 compel (6) 31:25 32:9,12,18 33:19 34:22 compelled (1) 33:11 complained (1) 63:23 complaint (1) 151:15 complaints (1) 44:6 complement (1) 8:6 complete (4) 55:2 103:14 123:2 162:22 completed (5) 28:10,18 39:14 77:25 120:14 complex (1) 157:20 complexities (1) 149:25 complexity (2) 28:4 166:1 compliance (1) 156:12 compliant (1) 90:6 complicated (3) 98:13,17 105:10 comprehensive (1) 170:20 compulsion (8) 32:24 127:22 136:17 152:3 153:23 154:3 155:21 156:5 concentrate (1) 126:25 concern (14) 14:21 22:20 59:12 62:14 68:6 103:10 108:13 121:6 122:12 153:10 154:15 162:12 165:8 171:22 concerned (6) 43:17 68:4 85:9 103:19 107:24 156:1 concerning (19) 84:7,8,13 85:15 87:17,22 90:1 95:22 96:9 98:1,2 100:3,10 102:16 113:8 120:11 121:3 134:16 137:4 concerns (42) 9:10 12:22 13:5 14:12 16:24 18:20 24:8 26:11 27:9 32:4 47:7,13 60:3 65:9 67:3,16 77:8 79:7 84:4,18,24 85:5 93:2 97:20 110:6,6 119:24,25 131:1 139:22 143:19 155:4 168:6,10,24 169:3,3,9 170:21,22 173:25 178:24 conclude (3) 8:25 51:15 57:18 concluded (6) 8:7 23:8 32:12 33:16 42:13 179:25	concludes (3) 80:7 100:16 179:22 conclusion (1) 58:11 conclusions (18) 6:15,22 36:5 45:9 49:24 53:15 58:25 64:9 95:20 96:8,18 97:3 100:24 103:13 112:19 176:18 177:4,5 concrete (1) 145:10 condescended (1) 86:8 condition (1) 34:9 conditions (56) 9:11 10:7,11,14 15:1 17:12 18:2,5,21 22:1,5,18,24 23:16,21,22 31:23 41:14 42:3 43:20 45:10 46:15 48:3 52:9,22,22,24,25 53:5,12 55:18 56:20 60:9,10 72:5 79:19,22 87:8 108:20,25 109:20 112:13,25 113:8 125:16 128:8 132:8 138:4,18 141:14 142:22 145:7 150:14 158:20 159:10 conduct (19) 9:5 22:15 24:8 25:9 31:10 34:25 46:7 47:7 61:3 67:13 103:8 114:11 124:20 125:4 126:5 137:14,21 148:25 164:8 conducted (3) 3:6 171:13 175:15 conducting (1) 76:17 confers (1) 37:15 confidence (1) 144:9 confident (3) 28:15 125:24 155:10 configuration (2) 20:13 50:8 confined (1) 139:6 confirm (5) 2:22 29:3 44:15 131:20 145:16 confirmed (3) 66:3,15 107:1 confirms (1) 44:6 confront (1) 134:24 confronted (2) 8:19 136:18 conrad (1) 89:20 conscientiously (1) 135:5 conscious (6) 37:4 60:16 67:25 83:14 99:12 105:17 consensus (6) 39:23,24 49:20 69:17 96:17,21 consent (1) 98:4 consequence (3) 43:14 130:20 165:25 consequences (5) 85:22 127:25 128:4 131:12 174:23 consider (34) 7:25 12:4 15:14 16:13 50:15 53:5,22 59:25 60:19 64:10 69:9 74:6 75:1,4,15,19 76:5,13 77:11,19 78:2,10 80:24 81:7,22 100:24 110:8 111:6,8,19 117:9 119:9 167:7 177:6 considerable (7) 28:4 31:18 36:17 58:4 105:18 116:25 175:12 consideration (13) 17:17 23:16 51:20 70:12 73:20 74:15 111:5 112:25 114:21 118:1 119:3 144:11 155:15 considered (14) 2:10 4:17 52:6 74:22 87:13 107:18 108:2 109:7,10 111:20 154:11 170:12 172:18 176:4 considering (4) 68:23 80:18,22 111:22 considers (3) 115:16 161:19 168:4 consistent (3) 22:14 45:17 127:21 conspicuous (1) 15:23 constraints (1) 8:6 constructive (1) 123:4
---	--	---	--	--	---	---

consultant (1) 96:2	coroner (1) 35:7	92:23 94:1 95:2,19 96:7	decisionmaking (18) 21:24	desperate (1) 14:25	died (4) 24:18 25:11 26:25	52:13
consulted (1) 116:9	corporate (7) 110:20 111:16	102:19 111:1 113:13	71:17 72:7,14,23 73:7	despite (9) 5:13 18:8 26:15	62:14	diseases (3) 18:6 128:6
contact (3) 14:17 25:12 93:17	131:25 132:4 133:12 169:2 174:6	116:24 118:5,9 119:6,7 121:1	74:17 75:5,14,16 79:5 89:5 91:2 148:12 163:12	31:7,25 149:2 155:3 156:8 169:10	difference (2) 126:9 145:1	153:16
contacted (1) 68:19	correct (4) 51:6 83:23	ctis (10) 34:13 39:11 57:24	167:10,18 171:16	destroyed (2) 66:15 120:15	different (14) 12:12 28:5	disengaged (1) 135:11
contained (2) 76:24 171:14	160:13 172:2	86:3,13 93:19 100:21	decisions (22) 21:8 23:9,13	detail (10) 20:4 42:3 54:17	48:4,13 54:15 56:6 62:23	disengagement (3) 86:4,11 97:9
containing (1) 135:14	correspondence (2) 100:11 129:11	119:3 120:9 177:6	24:3 55:15 56:19 72:18	77:6 116:25 117:1 147:22	63:17,17 93:3 114:4	disgrace (1) 122:11
contemplating (1) 99:11	corroborate (1) 160:23	culminated (1) 21:9	79:23 82:3 87:16,21	163:24 168:5,21	145:24 166:2 170:13	disjunct (1) 160:7
contemporaneous (15)	cost (4) 95:12 144:12,17 145:5	culminating (1) 15:5	89:8,19 90:16 92:12 138:5	detailed (9) 39:6 77:7 123:6	differs (1) 50:25	disparity (1) 160:7
10:13,16 11:15 13:5 15:20 17:18 32:4 38:17 41:19,22 45:22 47:15 108:20 109:19 173:5	costs (2) 31:11 144:12	culture (40) 13:11 45:2	149:10 162:8 163:10	147:7 148:4 151:23 157:21	difficult (4) 23:14 68:14	dispel (1) 65:8
contention (1) 96:19	couldnt (2) 125:24 141:25	47:21 49:1,8,14 55:10	167:12 171:24 172:2	159:3 172:23	difficulties (3) 12:9 99:21	dispels (1) 67:16
contents (1) 54:1	145:5	118:24 121:6 122:17,18 125:7 133:14 137:2	declined (2) 32:19 57:14	details (1) 66:8	134:12	disperse (1) 10:1
contest (1) 68:9	costeffective (2) 144:21 158:15	138:1,21 139:9 140:12	deeply (6) 13:10 24:22 85:9 131:16 143:1 145:5	detain (3) 11:22,23 12:7	difficulty (3) 61:6 100:8 132:1	dispute (4) 52:19 94:8 157:7 164:14
contested (3) 5:11 53:16 54:1	costly (1) 144:14	141:1,5,10,23	defences (1) 135:22	detained (78) 4:22 6:4 9:13	digital (1) 35:13	disputed (2) 158:13 165:7
context (31) 5:8 34:25 47:23 50:18,21 58:1 62:6,11 81:2 94:8,13 105:21 111:18 117:5 147:9,12 148:23 149:6 150:11 153:15,21 155:7 156:14 161:15 162:10 163:5,15,22,25 165:4 167:12	costs (2) 31:11 144:12	142:13,19,21 143:3 144:24 145:19 147:20 148:16	definition (4) 57:20,23 96:5 139:4	10:12 11:19 12:1,2,4 13:25 14:1,5,7,9,12,23,25 18:6,9,15,25 19:2,5 20:19,21 21:10,13,21 23:16,20 26:6 28:25 35:20 36:8 42:8 43:21 44:3 45:11 48:19 49:4 52:7 53:3 54:9 55:17 60:4 61:22 62:15 67:22 68:2 69:5,8,13 71:21 73:9 74:21 75:13 76:16,23 77:15 78:11 80:2 81:4,20,22 82:15 83:16 85:5 97:1,1 112:14 133:4 138:5,20 139:16 141:23 144:20 146:16 150:13 151:4	dimension (3) 14:13 135:17 137:21	disputes (2) 39:20 68:11
contexts (2) 62:8 164:17	counsel (23) 1:25 2:1 4:15 70:21 80:4 104:5 105:22 107:1,9 118:6 127:6 128:23 130:23 133:16 137:22 138:11,25 143:19 146:7,11 155:10 175:17 178:23	152:11 160:5,13 161:18 164:19 165:20 166:3,14 168:22 171:4	dehumanisation (7) 122:23 133:12 134:9 163:23 164:6 166:4,15	67:22 68:2 69:5,8,13 71:21 73:9 74:21 75:13 76:16,23 77:15 78:11 80:2 81:4,20,22 82:15 83:16 85:5 97:1,1 112:14 133:4 138:5,20 139:16 141:23 144:20 146:16 150:13 151:4	disregard (4) 165:5,9,11 172:13	disregarded (5) 168:16,25 169:12 173:11,23
contextual (1) 94:22	counsell (2) 125:24 141:25	168:22 171:4	dehumanised (1) 164:25	67:22 68:2 69:5,8,13 71:21 73:9 74:21 75:13 76:16,23 77:15 78:11 80:2 81:4,20,22 82:15 83:16 85:5 97:1,1 112:14 133:4 138:5,20 139:16 141:23 144:20 146:16 150:13 151:4	disregard (5) 168:16,25 169:12 173:11,23	disrespect (1) 111:16
continue (8) 1:12 5:15 41:6 83:11,12 123:5 130:14 136:11	couldnt (2) 125:24 141:25	168:22 171:4	dehumanising (2) 133:20 165:14	67:22 68:2 69:5,8,13 71:21 73:9 74:21 75:13 76:16,23 77:15 78:11 80:2 81:4,20,22 82:15 83:16 85:5 97:1,1 112:14 133:4 138:5,20 139:16 141:23 144:20 146:16 150:13 151:4	disrupt (1) 25:1	disruption (1) 154:5
continued (8) 23:1 125:22 126:20,22 130:21 141:13 155:3 162:9	counterparts (1) 44:1	168:22 171:4	deighton (4) 2:13 84:3 102:5 129:1	67:22 68:2 69:5,8,13 71:21 73:9 74:21 75:13 76:16,23 77:15 78:11 80:2 81:4,20,22 82:15 83:16 85:5 97:1,1 112:14 133:4 138:5,20 139:16 141:23 144:20 146:16 150:13 151:4	dissembling (1) 20:11	dissement (1) 140:2
continues (1) 149:1	countervailing (1) 45:7	168:22 171:4	delay (23) 3:6,12 8:4 26:22 31:9 38:25 85:12,13,21 96:23 99:24,25 102:15 103:5 104:18 124:24 125:11 126:4 135:23 143:21,25 144:3 153:2	67:22 68:2 69:5,8,13 71:21 73:9 74:21 75:13 76:16,23 77:15 78:11 80:2 81:4,20,22 82:15 83:16 85:5 97:1,1 112:14 133:4 138:5,20 139:16 141:23 144:20 146:16 150:13 151:4	distance (1) 98:16	distill (2) 116:6 117:14
continuing (3) 72:13 131:14 154:15	country (1) 24:24	168:22 171:4	delayed (4) 8:16 31:1,3 85:14 129:1	67:22 68:2 69:5,8,13 71:21 73:9 74:21 75:13 76:16,23 77:15 78:11 80:2 81:4,20,22 82:15 83:16 85:5 97:1,1 112:14 133:4 138:5,20 139:16 141:23 144:20 146:16 150:13 151:4	distinct (3) 34:24 54:6 58:22	distracted (1) 88:13
continuingly (1) 131:9	county (4) 19:8 60:23 174:7,12	168:22 171:4	delays (2) 126:22 128:18	67:22 68:2 69:5,8,13 71:21 73:9 74:21 75:13 76:16,23 77:15 78:11 80:2 81:4,20,22 82:15 83:16 85:5 97:1,1 112:14 133:4 138:5,20 139:16 141:23 144:20 146:16 150:13 151:4	diversity (1) 55:24	distraction (1) 88:19
continuous (1) 140:11	courage (1) 5:21	168:22 171:4	deliberate (2) 139:6 172:4	67:22 68:2 69:5,8,13 71:21 73:9 74:21 75:13 76:16,23 77:15 78:11 80:2 81:4,20,22 82:15 83:16 85:5 97:1,1 112:14 133:4 138:5,20 139:16 141:23 144:20 146:16 150:13 151:4	divert (1) 128:18	distressing (2) 23:7 52:17
contracted (6) 11:23 18:14,24 78:1 128:1,5	course (36) 3:9 9:2 21:14 23:25 24:19 27:13 67:16 52:10,12 62:16 80:6 83:10 85:14 96:12 104:6,12,20 108:22 110:2,7,12 114:10 115:3,21 116:20 118:6 119:6 124:13 126:4 137:13 143:20 144:10 153:3 157:24 171:24 175:25	168:22 171:4	deliberately (1) 125:11	67:22 68:2 69:5,8,13 71:21 73:9 74:21 75:13 76:16,23 77:15 78:11 80:2 81:4,20,22 82:15 83:16 85:5 97:1,1 112:14 133:4 138:5,20 139:16 141:23 144:20 146:16 150:13 151:4	divided (2) 84:5 93:21	district (1) 174:2
contracting (1) 138:18	courts (1) 155:21	168:22 171:4	deliver (1) 101:19	67:22 68:2 69:5,8,13 71:21 73:9 74:21 75:13 76:16,23 77:15 78:11 80:2 81:4,20,22 82:15 83:16 85:5 97:1,1 112:14 133:4 138:5,20 139:16 141:23 144:20 146:16 150:13 151:4	division (2) 5:12 151:7	divisions (1) 76:4
contractor (9) 13:24 14:4 16:22 30:22 86:7,12 113:4,5 140:23	cover (5) 23:6 54:18 61:20 80:10 82:11	168:22 171:4	delivered (1) 101:16	67:22 68:2 69:5,8,13 71:21 73:9 74:21 75:13 76:16,23 77:15 78:11 80:2 81:4,20,22 82:15 83:16 85:5 97:1,1 112:14 133:4 138:5,20 139:16 141:23 144:20 146:16 150:13 151:4	dl (3) 84:21,24 85:25	drips (2) 84:1,19
contractorprovided (1) 112:15	covered (3) 71:8 76:6 168:2	168:22 171:4	demeander (1) 163:11	67:22 68:2 69:5,8,13 71:21 73:9 74:21 75:13 76:16,23 77:15 78:11 80:2 81:4,20,22 82:15 83:16 85:5 97:1,1 112:14 133:4 138:5,20 139:16 141:23 144:20 146:16 150:13 151:4	dlobbin (55) 1:25	3:14,16,17,18 55:4,7,9 61:10,18,19 70:20,23 71:2,7 81:21 82:9 85:3 92:12 96:17 99:4 102:18 106:20 107:20 108:3 109:3 110:1 111:4,18,24 112:18 113:10 116:24 120:2,6,16 121:24 122:1,3 125:18 128:24 130:24 133:16 135:4 138:11 139:21 150:19 152:19 154:12 157:2 165:8 178:21 179:13,15 180:2
contractors (10) 12:12,24 23:13 24:6 48:17 56:6 57:9 63:17 134:13 149:1	covers (1) 78:10	168:22 171:4	demeanour (1) 163:11	67:22 68:2 69:5,8,13 71:21 73:9 74:21 75:13 76:16,23 77:15 78:11 80:2 81:4,20,22 82:15 83:16 85:5 97:1,1 112:14 133:4 138:5,20 139:16 141:23 144:20 146:16 150:13 151:4	discharge (4) 8:1,17 90:2 149:11	dobbins (3) 106:11 110:7 119:23
contracts (1) 42:24	cpr (1) 94:19	168:22 171:4	demonising (1) 137:18	67:22 68:2 69:5,8,13 71:21 73:9 74:21 75:13 76:16,23 77:15 78:11 80:2 81:4,20,22 82:15 83:16 85:5 97:1,1 112:14 133:4 138:5,20 139:16 141:23 144:20 146:16 150:13 151:4	discharged (2) 15:12 32:16	doctor (2) 26:9,16
contractual (1) 156:20	cramps (1) 16:5	168:22 171:4	demonstrate (3) 28:2 148:10 162:13	67:22 68:2 69:5,8,13 71:21 73:9 74:21 75:13 76:16,23 77:15 78:11 80:2 81:4,20,22 82:15 83:16 85:5 97:1,1 112:14 133:4 138:5,20 139:16 141:23 144:20 146:16 150:13 151:4	discipline (5) 46:17 119:10 120:2 121:17,20	doctors (5) 18:13 34:23 36:23 37:5,11
contrary (1) 155:13	created (1) 130:20	168:22 171:4	demonstrates (4) 22:12 46:11 161:22 162:6	67:22 68:2 69:5,8,13 71:21 73:9 74:21 75:13 76:16,23 77:15 78:11 80:2 81:4,20,22 82:15 83:16 85:5 97:1,1 112:14 133:4 138:5,20 139:16 141:23 144:20 146:16 150:13 151:4	disciplined (1) 140:21	document (2) 28:17 53:21
contrast (1) 93:16	creating (2) 15:25 72:8	168:22 171:4	demonstration (1) 16:16	67:22 68:2 69:5,8,13 71:21 73:9 74:21 75:13 76:16,23 77:15 78:11 80:2 81:4,20,22 82:15 83:16 85:5 97:1,1 112:14 133:4 138:5,20 139:16 141:23 144:20 146:16 150:13 151:4	disciplines (1) 95:16	documentary (8) 6:19 41:20,22 45:23 47:15 48:20 73:20 75:2
cravened (1) 173:16	credible (1) 137:8	168:22 171:4	demonstrated (1) 137:18	67:22 68:2 69:5,8,13 71:21 73:9 74:21 75:13 76:16,23 77:15 78:11 80:2 81:4,20,22 82:15 83:16 85:5 97:1,1 112:14 133:4 138:5,20 139:16 141:23 144:20 146:16 150:13 151:4	disclosure (49) 1:9 3:20 8:21 28:6,10,12 29:9,14,24 32:2 35:9,19 36:10,14 37:15,18 40:9 65:14 66:13 67:6 68:5 71:5 82:9,10,13 83:5,8 84:14 86:3 99:8 102:16 105:15,19,24 106:2,13,19 107:3 109:16,21 125:9,15 126:2 128:18,20 130:18 144:1 153:6 171:25	documentation (1) 161:22
contributed (3) 25:24 27:14 50:8	creep (1) 125:13	168:22 171:4	demonstrated (1) 137:18	67:22 68:2 69:5,8,13 71:21 73:9 74:21 75:13 76:16,23 77:15 78:11 80:2 81:4,20,22 82:15 83:16 85:5 97:1,1 112:14 133:4 138:5,20 139:16 141:23 144:20 146:16 150:13 151:4	disclosure (49) 1:9 3:20 8:21 28:6,10,12 29:9,14,24 32:2 35:9,19 36:10,14 37:15,18 40:9 65:14 66:13 67:6 68:5 71:5 82:9,10,13 83:5,8 84:14 86:3 99:8 102:16 105:15,19,24 106:2,13,19 107:3 109:16,21 125:9,15 126:2 128:18,20 130:18 144:1 153:6 171:25	documented (5) 10:18 16:21 20:1,22 24:8
contribution (2) 4:8 153:9	criminal (3) 7:14 163:15 164:8	168:22 171:4	demonstrated (1) 137:18	67:22 68:2 69:5,8,13 71:21 73:9 74:21 75:13 76:16,23 77:15 78:11 80:2 81:4,20,22 82:15 83:16 85:5 97:1,1 112:14 133:4 138:5,20 139:16 141:23 144:20 146:16 150:13 151:4	disclosure (49) 1:9 3:20 8:21 28:6,10,12 29:9,14,24 32:2 35:9,19 36:10,14 37:15,18 40:9 65:14 66:13 67:6 68:5 71:5 82:9,10,13 83:5,8 84:14 86:3 99:8 102:16 105:15,19,24 106:2,13,19 107:3 109:16,21 125:9,15 126:2 128:18,20 130:18 144:1 153:6 171:25	documenting (1) 158:6
contributions (1) 151:3	criminalisation (1) 166:4	168:22 171:4	demonstrated (1) 137:18	67:22 68:2 69:5,8,13 71:21 73:9 74:21 75:13 76:16,23 77:15 78:11 80:2 81:4,20,22 82:15 83:16 85:5 97:1,1 112:14 133:4 138:5,20 139:16 141:23 144:20 146:16 150:13 151:4	disclosure (49) 1:9 3:20 8:21 28:6,10,12 29:9,14,24 32:2 35:9,19 36:10,14 37:15,18 40:9 65:14 66:13 67:6 68:5 71:5 82:9,10,13 83:5,8 84:14 86:3 99:8 102:16 105:15,19,24 106:2,13,19 107:3 109:16,21 125:9,15 126:2 128:18,20 130:18 144:1 153:6 171:25	documents (31) 13:5 26:3 28:11,13,16 29:20,23 30:12,17 36:13,17 37:3 40:15,17,23 82:13,17,22,23 83:1 98:5,7 106:10,14,16 107:5,7 134:16 135:13 153:6 172:3
control (6) 19:15 117:22 119:15,18 121:2,7	crisis (4) 9:19 88:14 89:11 91:25	168:22 171:4	demonstrated (1) 137:18	67:22 68:2 69:5,8,13 71:21 73:9 74:21 75:13 76:16,23 77:15 78:11 80:2 81:4,20,22 82:15 83:16 85:5 97:1,1 112:14 133:4 138:5,20 139:16 141:23 144:20 146:16 150:13 151:4	disclosure (49) 1:9 3:20 8:21 28:6,10,12 29:9,14,24 32:2 35:9,19 36:10,14 37:15,18 40:9 65:14 66:13 67:6 68:5 71:5 82:9,10,13 83:5,8 84:14 86:3 99:8 102:16 105:15,19,24 106:2,13,19 107:3 109:16,21 125:9,15 126:2 128:18,20 130:18 144:1 153:6 171:25	does (23) 6:23 24:7 26:4 69:1 74:15 78:23 94:10 99:5 104:18 118:8 135:1 136:15,24 142:12
controversy (1) 160:6	crisis (4) 9:19 88:14 89:11 91:25	168:22 171:4	demonstrated (1) 137:18	67:22 68:2 69:5,8,13 71:21 73:9 74:21 75:13 76:16,23 77:15 78:11 80:2 81:4,20,22 82:15 83:16 85:5 97:1,1 112:14 133:4 138:5,20 139:16 141:23 144:20 146:16 150:13 151:4	disclosure (49) 1:9 3:20 8:21 28:6,10,12 29:9,14,24 32:2 35:9,19 36:10,14 37:15,18 40:9 65:14 66:13 67:6 68:5 71:5 82:9,10,13 83:5,8 84:14 86:3 99:8 102:16 105:15,19,24 106:2,13,19 107:3 109:16,21 125:9,15 126:2 128:18,20 130:18 144:1 153:6 171:25	doing (5) 84:2

domain (1) 67:9	e (1) 93:19	ending (1) 72:2	eventually (2) 31:8 92:8	151:18 163:2 164:5 168:8 171:17,17	exposure (2) 52:24 53:6	feel (4) 5:21 8:14 23:2 150:15
done (14) 24:13 48:25 49:2 66:25 105:21 109:24 114:12,24 118:7 124:18 126:17,18 150:3 151:13	eager (3) 98:10 102:24 106:21	endorse (13) 95:19 106:17 118:24 126:12 129:1 132:15 135:16 152:14 157:14,15 167:2 171:2 172:11	every (7) 8:19 32:1 33:17 35:19 112:1 126:11 136:14 everybody (1) 101:23 everyone (9) 37:23 40:24 61:16 66:8,23 145:24 175:9 178:17 179:19 everyones (1) 178:19	examples (4) 32:11 62:4 120:10 165:13 exceeded (1) 28:6 excellent (1) 114:11 exceptional (1) 107:18 exceptionality (1) 52:7 excess (5) 9:13,13 30:13 91:11 92:4 exchequer (1) 89:14 excluding (2) 95:12 137:10 exclusion (1) 6:13 exercise (8) 40:25 41:5,8 114:6,9,12 127:13 156:19 exhibit (2) 98:7,8 exhibited (1) 159:19 exhibits (6) 39:17 44:15 98:21 123:10 130:3,7 exist (4) 36:10,15 38:9 108:1 existed (1) 87:6 existence (2) 36:18 38:16 existing (3) 53:15 59:5 96:14 exists (2) 109:4 154:6 expect (4) 3:9 38:12 86:21 99:14	express (2) 22:19 58:15 expressions (1) 103:11 expressly (2) 50:13 119:17 extensions (1) 31:8 extensive (8) 35:9 111:9 147:6,11 149:2 159:8 160:2 163:16 extent (11) 8:8 21:20 22:5 23:12 41:7 57:1 73:24 74:13 88:18 109:23 156:10 external (1) 173:5 externally (1) 54:11 extra (1) 153:2 extracted (1) 176:18 extremely (5) 35:21 37:25 111:15 115:12 120:14 eye (1) 10:24	fees (1) 144:18 fell (2) 19:12 125:23 felt (2) 111:12 133:19 fence (1) 12:20 few (11) 20:10 33:22 61:9 62:13 67:23 76:15 82:11 85:13 117:15 132:4 145:3 fibromyalgia (1) 128:8 field (3) 47:19 54:12 167:3 fifth (3) 76:10 125:3 145:17 file (1) 100:14 fired (2) 98:9 99:16 files (2) 66:6,11 fill (1) 15:22 film (1) 84:15 filmed (2) 16:23 48:6 filtered (1) 140:1 filtering (2) 114:9,12 final (17) 8:4 28:21,23 29:18 82:3,11 97:19 99:7 104:8 123:1,12 137:3 145:3 176:2,5 177:8 178:15 finalise (1) 130:17 finalised (7) 29:4 40:18 67:23 78:8,13 97:4 123:9 finally (12) 78:14 82:8 97:6 102:21 116:17 143:6 152:15 170:8,23 172:17 174:4 177:8 finding (5) 141:1,4 144:4,6 145:21 findings (36) 1:22 8:10,15 9:17 31:23 38:20 46:9 47:21 49:7,24 51:19 53:18 57:12,15 64:23 67:10 103:21 104:24 112:20,23 113:23 133:17,21 140:12,16 141:6,7 142:23 144:14 147:13 148:4,19,24 149:2 158:10,24 finish (3) 60:16 123:1,20 140:12,16 141:6,7 142:23 144:14 147:13 148:4,19,24 149:2 158:10,24 firm (2) 89:11 135:8 firms (6) 4:21,23 81:3,24 82:14,18 first (4) 2:5 3:19 5:9 17:19 44:11 45:12 47:23 52:2 54:13 55:14 62:23 63:12 65:4,10 71:3,6,12 78:24 79:6 83:15 85:1,13 86:24 93:24 94:5 96:19 98:14,19 102:14 103:3 104:17 110:8,20 111:24 114:18 115:10,15 117:16 122:14 124:24 129:7 130:6 143:24 145:11 168:17 firsthand (1) 136:23 firstly (1) 83:19 fit (2) 18:22 134:6 five (1) 102:13 fix (3) 145:11 176:2 178:15 fixed (8) 7:17 70:9 89:7 107:17 129:2 131:21 145:12,16 fixing (2) 126:24 127:3 flag (1) 161:14 flagged (1) 121:23 flagrant (1) 165:11 flexibility (2) 85:4 98:1 flexible (1) 94:23 flooring (1) 18:19 focus (12) 30:14 41:1 56:23 58:9 93:21,21 109:21 110:20 112:22,24 115:3 151:24 focused (7) 26:3 48:5 72:20 96:4 103:18 138:14 focusing (1) 147:8 foil (12) 13:15 19:1 77:7,18,23 148:2 153:12,19 154:19 158:21 161:11,23 follow (1) 130:8
F						
face (3) 13:23 59:23 67:1	faces (2) 66:22 67:12	facilitate (1) 165:23	facilitated (1) 164:23	facilities (4) 16:1 19:11 146:20 158:19	facility (5) 6:4 22:8 46:14 89:16 93:5	facing (2) 7:18 76:10
factfinding (2) 41:19 56:10	facto (3) 22:8 93:6 120:8	factor (2) 74:16 164:4	factored (2) 151:14,17	factors (3) 25:24 50:7 51:21	factsensitive (1) 33:20	factual (2) 20:14 43:5
fades (1) 126:10	fail (1) 148:19	failed (6) 31:6 127:7,8 140:10 162:3,4	failing (1) 172:8	failings (1) 162:13	failure (13) 97:12 139:7,9 140:23 141:9,22 142:10 148:4 153:9 154:16 163:3 166:13 172:1	failures (3) 122:24 142:18 172:4
fair (1) 33:12	fairly (3) 6:25 87:3 132:10	fairness (5) 6:11 7:4 9:2 37:11 179:9	fairweather (7) 96:1 100:25 157:8 158:12 159:15 160:21 176:19	fairweathers (1) 160:13	fall (3) 54:11 121:19 157:5	falls (3) 52:6 59:18 161:6
familiar (3) 4:4 112:5 118:15	families (5) 10:10,19,22 23:3 146:22	family (7) 15:21 18:18 25:13,14,15,16 52:8	far (11) 9:13 14:14 21:7,24 55:4 72:17 93:7 97:17 107:3 129:20 160:6	fashion (1) 117:13	fatal (1) 25:3	fatigue (1) 46:18
fault (1) 85:12	favour (2) 69:19 157:3	favoured (1) 157:17	fear (1) 131:12	feared (1) 24:22	fearful (1) 117:6	fears (1) 133:4
feature (3) 65:22 155:19 171:16	featured (1) 92:5	features (2) 66:23 171:19	february (5) 39:24 40:6 81:19 145:11 150:21	februaryearly (1) 126:16	februarymarch (1) 144:3	fed (1) 75:13
feed (1) 3:7						
E						
effect (5) 53:3 103:12 106:3 113:12 131:8	effective (14) 33:12,17 90:8 124:20 125:4 127:5 130:22 135:3 144:8 150:15 151:13,16 159:12 175:14	effectively (7) 1:23 8:5 104:24 132:10 145:7 149:11 165:21	effectiveness (3) 126:8 129:15 131:17	effects (2) 49:12 59:15	efficient (1) 175:15	effort (1) 105:20
efforts (5) 105:19 116:14 175:11,12 179:17	egregious (1) 9:22	eight (3) 71:11 99:15 146:22	eighth (1) 78:6	either (8) 46:20 73:1,5 76:1 79:17 97:11 162:3 166:7	elections (1) 21:8	electronic (1) 20:21
element (1) 166:25	elias (1) 90:4	elicit (1) 52:18	else (4) 37:24 126:14 166:8 179:13	elsewhere (1) 161:13	emaciated (1) 133:5	email (3) 10:22 15:24 22:21
embark (2) 35:25 40:5	embedded (3) 66:16 137:20 170:6	emerged (1) 9:6	emergency (1) 26:15	emerging (1) 122:2	emma (3) 81:10,13 115:17	emotionally (1) 23:3
emphasis (7) 5:18 7:9 94:4 99:2 106:25 151:9 156:13	emphasised (1) 162:11	emphasises (1) 87:9	emphasising (1) 149:8	employed (5) 37:12 47:22 49:4 173:1,13	employee (2) 31:14 44:7	employees (4) 44:10,20,24 48:16
employment (1) 135:25	empty (1) 92:8	emptying (1) 15:21	enable (11) 1:21 4:1 8:4 49:7 60:4 69:4 94:15 118:9 176:5,8 178:14	enabled (2) 25:14 139:18	enables (1) 20:3	enacted (1) 72:10
encapsulated (1) 9:16	encapsulation (1) 10:2	encompasses (1) 28:4	encountered (3) 45:10 56:20 112:13	end (16) 23:11 28:15 19 40:8 81:15 106:10 113:14 128:2 129:1 130:4 141:11,25 144:4 166:17,18 178:17	ended (2) 12:3 164:2	
endurance (1) 128:3	enforced (1) 120:8	enforcement (4) 76:3 116:5 141:21 142:17	engage (1) 31:2	engaged (6) 51:1 81:16 103:17 123:4 127:17 151:12	engagement (4) 34:14 125:25 127:21 156:18	engaging (1) 135:15
england (2) 14:23 15:6	enough (3) 11:7 126:1 127:3	enquiries (1) 108:4	ensued (2) 88:5 159:4	ensure (13) 5:25 6:4,18 7:7 30:15 40:9 63:7 68:10 98:10 107:25 109:25 150:24 177:17	ensuring (5) 6:25 15:10 30:13 127:14 156:19	entail (1) 51:25
entails (1) 91:22	enter (1) 133:3	entertainment (1) 10:21	entire (2) 13:12 22:9	entirely (7) 35:15 99:4 103:25 104:19 107:11 135:11 166:22	entities (1) 20:20	entitled (2) 23:22 131:10
entity (1) 37:19	enumerated (2) 63:6 89:23	environment (6) 22:25 58:15 121:8 132:23 133:13 134:9	environmental (1) 174:3	equality (2) 60:21 143:12	equally (4) 8:2 10:6 43:11 80:11	equip (2) 46:13 144:24
equipped (1) 68:11	equivalent (1) 63:9	eradicated (1) 24:24	eritrean (1) 171:20	escalate (1) 120:23	escalated (1) 122:2	escalation (2) 77:8 162:1
escaping (1) 140:20	escort (2) 42:21 62:19	escorting (2) 31:17 66:2	especially (2) 24:25 47:3	essence (1) 25:9	essential (5) 94:23 127:16 128:7,9 149:9	essentially (4) 101:20 117:20 121:6 179:17
establish (1) 155:16	established (1) 78:25	establishing (1) 71:24	estate (1) 91:8	et (1) 162:21	ethical (3) 81:16 116:10,12	ethnic (2) 139:9 171:21
ethnically (1) 55:23	ethos (7) 45:2 47:3 49:8 59:3 60:5,11 168:22	european (1) 32:14	evaluating (2) 61:2,6	evaluation (1) 60:25	even (18) 11:19 16:5 22:4 23:4 29:25 31:3 55:7 95:4,10 125:14 131:9 136:21 143:15 145:4 155:25 158:18 172:14	event (1) 41:25
events (7) 5:23 7:1 16:11						
eventually (2) 31:8 92:8	every (7) 8:19 32:1 33:17 35:19 112:1 126:11 136:14 everybody (1) 101:23 everyone (9) 37:23 40:24 61:16 66:8,23 145:24 175:9 178:17 179:19 everyones (1) 178:19	evidence (265) 4:3 6:5,13,19,21,24,25 7:21,25 8:8,17 10:10 12:25 13:2,18 15:14 17:10,24 18:16 19:4 20:25 21:7 22:11,17 24:7,10,11 27:18 29:17 31:16,19,20,22,25 32:9 33:3,5,8,9,25 34:7,12,23 35:4 36:7,7 37:7 38:13,17,19,20,22,23 39:2,19 40:14 41:5,12,13,14,20,22 42:5,10,11,17 44:23 45:18,19,20,23,24 46:3,4,23 47:5,6,10,16 48:1,19,20,20,21 49:17 50:15,18,23 51:11,14,15,17 52:2 53:2,17,23 56:7 57:11 58:4,10 59:7,20 60:11 61:1,6,23 62:22 64:7,11,23 68:9 69:10,11,12,16 73:5,20 74:5,15 75:2,20 76:5,12,14,19,22,25 77:12,13 78:2 79:7,17,21,25 80:7,16,19,24,25 81:23 82:1,4 84:10,10 85:23 87:1 89:21,24 90:14 94:9,15,24 95:5,6,12,24 96:9,21 97:17 99:11,13,15 102:17 103:14 108:20 109:19 112:9,17,19 113:1,5,15,22 114:2 115:7,16,24 116:13 118:7,18 119:1,9,22 120:7,10,19 121:22 125:3 126:2,24 127:12,15 128:12 131:19,22,24 132:11,14,17 133:9,22 134:5,6,11,19 135:2,24 136:8,21 137:4,10,23 138:24 139:21 140:9 142:4,12 143:20,23 144:4 147:7,11,16,22,23 148:10 150:1,14 152:7 153:5 155:1,8,11 156:2,24 157:8 159:21 161:7,19 162:6,10,12,23,24 163:7,13,25 164:10 168:4,14 169:16,19 170:2,3,11,18 171:3,3,6,20 172:3,11,19,23 175:4 evidencegathering (3) 40:7 41:5 80:6 evident (1) 164:10 evidential (1) 40:18 evidently (1) 50:10 evolving (1) 118:20 exactly (4) 106:21 108:3 114:25 117:11 examination (6) 23:19 27:25 36:1 37:16 60:6 113:7 examine (7) 17:17 21:14 41:9 54:18 55:14 139:4 142:5 examined (2) 69:20 142:11 examining (2) 9:1 115:9 example (60) 12:2 14:16 20:23 32:14 34:16 35:2 38:18,25 40:5 44:20,24 45:16 48:8,24 51:21,23 53:21 54:8,11,21 55:15 57:5 59:13 61:1,24 62:2,7 63:6,13,14,21 64:10,18 65:24 66:2 68:8 69:18 80:16 88:1,15 91:2 92:6 93:10 98:17 104:1,3 106:5 120:12,17 121:15 132:25 148:22 149:20 150:7	151:18 163:2 164:5 168:8 171:17,17 examples (4) 32:11 62:4 120:10 165:13 exceeded (1) 28:6 excellent (1) 114:11 exceptional (1) 107:18 exceptionality (1) 52:7 excess (5) 9:13,13 30:13 91:11 92:4 exchequer (1) 89:14 excluding (2) 95:12 137:10 exclusion (1) 6:13 exercise (8) 40:25 41:5,8 114:6,9,12 127:13 156:19 exhibit (2) 98:7,8 exhibited (1) 159:19 exhibits (6) 39:17 44:15 98:21 123:10 130:3,7 exist (4) 36:10,15 38:9 108:1 existed (1) 87:6 existence (2) 36:18 38:16 existing (3) 53:15 59:5 96:14 exists (2) 109:4 154:6 expect (4) 3:9 38:12 86:21 99:14 expectation (1) 28:6 expected (5) 34:15 65:8 106:12 152:22 154:25 expedition (3) 124:22 145:8 176:5 expeditious (1) 158:14 expenditure (1) 74:19 expensive (1) 143:20 experience (8) 50:2,3,5 79:20 111:10,13 160:3 161:21 experienced (6) 17:14 33:24 52:20 113:18 119:20 143:15 experiences (1) 126:15 experiencing (1) 132:23 expert (86) 25:23 27:5,8 34:10 36:22 40:10 49:12,16,17,22,25 50:7,18,23,25 51:3,8,15,24 52:2,16 53:2,8,15,25 54:5 56:13 58:19,20,21,22 60:14 61:21 64:23 84:10,10,15 93:20,22,25 94:15 95:15,23 96:9,13 97:17 100:22 102:17 118:18,23 119:1,4,8 121:10,19,20 122:16 125:6 126:24 137:4,23 138:22 142:16 143:3,7,20,24 144:7,23 145:19 147:20 152:7 156:24 157:7,19 158:2,3 159:14,16,17 161:7 165:20 166:9 167:3 176:9 178:25 expertise (15) 50:11 54:12 59:10 96:15 137:12,24 140:5 142:21 144:16 147:8 148:7 159:9 164:17 165:19 169:11 experts (15) 9:8 49:10 58:18 64:17 95:16,20,25 96:14,18 143:11 144:18 157:9 158:11,12 166:10 explain (9) 7:1 20:8 24:2 72:23 82:18 90:15 93:14 134:3 165:21 explained (4) 30:11 65:23 152:18 179:5 explaining (3) 143:5 148:7 164:21 explains (1) 36:21 explanation (4) 111:4 148:1 166:16 172:13 explore (1) 54:19 explored (2) 13:2 22:15 exposed (6) 10:7 16:17 17:11 23:21 52:12 64:13 exposes (1) 133:9 exposition (1) 159:3	151:18 163:2 164:5 168:8 171:17,17 examples (4) 32:11 62:4 120:10 165:13 exceeded (1) 28:6 excellent (1) 114:11 exceptional (1) 107:18 exceptionality (1) 52:7 excess (5) 9:13,13 30:13 91:11 92:4 exchequer (1) 89:14 excluding (2) 95:12 137:10 exclusion (1) 6:13 exercise (8) 40:25 41:5,8 114:6,9,12 127:13 156:19 exhibit (2) 98:7,8 exhibited (1) 159:19 exhibits (6) 39:17 44:15 98:21 123:10 130:3,7 exist (4) 36:10,15 38:9 108:1 existed (1) 87:6 existence (2) 36:18 38:16 existing (3) 53:15 59:5 96:14 exists (2) 109:4 154:6 expect (4) 3:9 38:12 86:21 99:14 expectation (1) 28:6 expected (5) 34:15 65:8 106:12 152:22 154:25 expedition (3) 124:22 145:8 176:5 expeditious (1) 158:14 expenditure (1) 74:19 expensive (1) 143:20 experience (8) 50:2,3,5 79:20 111:10,13 160:3 161:21 experienced (6) 17:14 33:24 52:20 113:18 119:20 143:15 experiences (1) 126:15 experiencing (1) 132:23 expert (86) 25:23 27:5,8 34:10 36:22 40:10 49:12,16,17,22,25 50:7,18,23,25 51:3,8,15,24 52:2,16 53:2,8,15,25 54:5 56:13 58:19,20,21,22 60:14 61:21 64:23 84:10,10,15 93:20,22,25 94:15 95:15,23 96:9,13 97:17 100:22 102:17 118:18,23 119:1,4,8 121:10,19,20 122:16 125:6 126:24 137:4,23 138:22 142:16 143:3,7,20,24 144:7,23 145:19 147:20 152:7 156:24 157:7,19 158:2,3 159:14,16,17 161:7 165:20 166:9 167:3 176:9 178:25 expertise (15) 50:11 54:12 59:10 96:15 137:12,24 140:5 142:21 144:16 147:8 148:7 159:9 164:17 165:19 169:11 experts (15) 9:8 49:10 58:18 64:17 95:16,20,25 96:14,18 143:11 144:18 157:9 158:11,12 166:10 explain (9) 7:1 20:8 24:2 72:23 82:18 90:15 93:14 134:3 165:21 explained (4) 30:11 65:23 152:18 179:5 explaining (3) 143:5 148:7 164:21 explains (1) 36:21 explanation (4) 111:4 148:1 166:16 172:13 explore (1) 54:19 explored (2) 13:2 22:15 exposed (6) 10:7 16:17 17:11 23:21 52:12 64:13 exposes (1) 133:9 exposition (1) 159:3	151:18 163:2 164:5 168:8 171:17,17 examples (4) 32:11 62:4 120:10 165:13 exceeded (1) 28:6 excellent (1) 1	

followed (6) 3:2 66:1 88:13 161:11,24 162:2 following (13) 2:22 3:10 65:14 71:3 80:22 87:12 94:4 96:19 119:3 176:15 177:6,25 178:13 follows (3) 71:10 84:6 176:16 followup (2) 26:20 106:6 food (8) 11:7 14:6 15:18 19:21 92:13 122:9 123:19 138:10 foods (1) 16:9 footage (30) 16:14 48:6 64:18 65:5,6,9,16,19,20,22 66:4,7,14,14,21,23 67:13 107:20,25 108:1,9,24 109:4,7,12,25 110:8,13 136:23 177:18 football (1) 11:9 footing (1) 156:16 force (60) 13:21 16:15 49:13 58:21 61:21,23 62:5,7,10,23 63:1,5,11,14,15,18,21,21,24 64:2,6,10,11,13,14,17,19 65:24 73:24 79:1,11 81:12 84:15 108:11,13,16,18,23 109:20 118:21 119:8,10,15,18,25 120:6,12,12,13,17,19 121:2,3,7,13,15 122:6,23 128:21 132:9 forced (3) 9:20 23:9,13 forclosure (1) 6:17 foreign (1) 58:2 forensic (1) 7:11 foreseen (1) 22:6 foreshadowed (1) 39:11 forgiven (1) 85:7 form (7) 10:4,8 31:24 33:10 50:3 89:17 171:21 formal (2) 70:6 77:9 formally (5) 11:24 12:1,3 175:10 176:7 former (20) 31:14,16,20 73:3,10,16 74:8 76:20 80:15 87:16 92:10 93:12 96:4 124:7 129:22 135:10 150:13 151:4 152:24 156:8 formerly (9) 71:21 73:9 74:21 75:12 76:23 77:15 78:11 81:4 82:14 forms (8) 35:12 59:11 64:3 120:14 138:7 162:19 164:8 166:2 forth (1) 64:20 forthcoming (1) 103:25 fortified (1) 94:16 fortunately (1) 24:23 forward (6) 17:4 61:2 127:2 150:18 157:16,23 found (8) 18:7 58:4,12 133:4 141:16 142:1 157:3 174:16 foundation (2) 4:6 103:1 four (6) 85:10 115:10,12 124:13 130:11 172:20 fourth (6) 75:9 102:17 118:12 121:23 125:1 145:15 frailty (1) 41:18 framed (2) 50:16 58:17 framework (7) 22:7 49:19,21 59:5 62:24 72:17 179:17 frank (1) 22:23 fraught (1) 131:3 fresh (1) 122:8 friday (1) 1:1 friends (5) 27:3 51:22 65:3 66:20 83:15 frightening (2) 15:5 16:18 froing (2) 97:5,16 frontline (4) 48:1 114:2 170:25 171:1 fronts (1) 13:1 fruit (1) 11:7 fruitful (1) 123:4	fruition (1) 88:25 frustrating (2) 37:21 38:4 fulfil (5) 9:20 37:22 38:5 155:11 166:10 fulfilling (1) 78:22 fulfilment (2) 1:23 104:25 full (7) 127:14 129:16 138:2 142:3 154:16 157:19 176:23 fullest (2) 152:22 156:9 fully (13) 91:10 118:24 124:10 128:10 132:15 148:6 150:9 153:9 156:21 163:18 164:16 165:20 168:2 function (7) 7:13 9:20 93:15 149:14 155:1,11 169:13 functions (2) 15:11 156:20 fundamental (8) 15:16 36:2 139:25 156:12 160:7 162:13 172:1,9 fundamentally (1) 101:15 funding (7) 74:12,16,23 87:17 89:15,19 90:18 further (58) 3:11 9:4,8 26:2,3 27:5 29:1,2,5 30:20 39:4 44:18 49:11 53:11 66:4 71:3 74:10 77:14,20 78:2 80:12,23 81:8 82:4,6 83:7 84:8 86:14 92:16 95:23 97:23 103:15 106:10,22 107:15,17 110:14 111:7 123:15 125:8 126:21 132:20 135:22 143:1 145:18 146:2 148:22,23 152:15,15 154:11 176:21 177:1,7,14,20,22 178:10 future (4) 103:9 124:16 128:25 147:15	G games (1) 11:8 gap (1) 141:1 gaps (6) 71:5 82:12 83:12 125:2 126:23 131:22 gareth (2) 167:23 168:8 gastroenteritis (1) 128:6 gather (1) 8:16 gathered (1) 21:7 gathering (4) 6:23 17:10 31:1 41:6 gave (6) 53:7 95:20 115:22 153:10 155:4 169:19 genderbased (1) 117:25 general (13) 9:16 39:19 46:17 67:8 69:17,22 81:10,14 115:18 116:4 157:22 169:21 177:16 generally (5) 14:22 69:18 75:16,18 150:17 generating (1) 5:12 generic (10) 84:4,18,23 95:20 158:2,8 176:9,12,18,24 genuine (1) 142:14 gestmin (1) 41:17 get (5) 103:13 139:24 169:1,2 172:24 getting (1) 144:13 gillian (1) 176:20 give (41) 4:2 6:5 33:2,5,8,9 38:22 40:16 48:1 67:11 69:11,13,16 79:25 80:19,23 81:23,25 82:4 90:21 99:15,19 101:4 115:24 127:15 129:16 131:11 136:25 150:4,14,16 166:11,15,17 168:20 169:12 170:11 171:17,20 172:18,22 given (48) 4:8 10:20 24 14:6 17:17 18:5 31:7 37:14 38:24 52:6 54:6 55:23,23 57:6 63:22 68:18 79:17 85:17 91:1 94:7 97:2 98:19	100:14 105:12,14 108:10 110:17 117:14 118:19 126:10 129:9,12,13 141:21 145:6 150:7,12 154:25 155:14,24 164:20 168:14,14 170:2 172:23 175:18 176:7 179:7 givenwilson (5) 96:1 100:25 157:8 159:15 176:20 gives (5) 37:14 60:1 103:9 125:12 159:20 giving (8) 42:11,16 69:10 99:11,13 114:2 127:11 155:1 glad (2) 17:5 25:11 gladly (1) 134:15 glass (1) 11:5 glynn (3) 2:14 84:3 102:6 glynns (1) 129:1 goes (6) 80:18 87:19 105:2 129:15 159:4,9 going (21) 11:18 39:6 54:14 66:8 83:21 84:23 115:2 136:22 147:21 150:17 166:6 169:1 172:19 173:9 174:19 176:15,20 177:1,13,22 178:11 gold (5) 2:16 123:23 124:8 130:5 136:10 gone (6) 11:9 38:21 59:13 67:25 70:14 141:7 good (9) 1:4 63:7 85:18 97:22 103:9 105:7 141:2 179:21,23 governance (4) 119:10 120:11 121:5,17 government (6) 21:9 30:22 31:6 42:12 88:12 156:15 governments (1) 71:23 gp (1) 54:10 grant (1) 29:19 granted (1) 85:20 granting (1) 104:12 granular (2) 168:21 172:12 graphic (1) 165:13 grapple (1) 141:25 grasped (1) 154:24 grateful (22) 1:10 2:9 4:7 67:23 70:14,20,22 80:1 97:25 101:9,10 106:9 107:21 110:3 114:20 122:1 124:4,9 157:2 175:16 179:16,18 gratitude (1) 105:16 grave (1) 158:20 graver (1) 142:15 gravity (3) 154:18 159:3 165:25 great (2) 14:17,21 greater (4) 3:3 54:17 144:3 154:3 greatest (2) 153:10 164:20 grew (1) 10:13 grim (1) 22:5 gross (1) 87:24 ground (35) 43:13 58:13 61:20 78:3 79:15,23 81:1 109:1,20 110:21 111:11 113:1,4,10,17,19,21 114:7 132:5,20,23 133:10,23 134:8,14 137:19 138:18 140:1 141:3,6 145:18 147:1,19 148:14 168:7 groundlevel (3) 133:9 134:11 136:22 grounds (3) 18:3 29:16 79:19 group (4) 5:19 16:15 42:8 130:6 groups (2) 46:21 139:3 growing (1) 20:18 guard (3) 12:19 38:14 57:9 guarded (2) 12:12,14 guarding (1) 144:20 guards (8) 12:16,18,22 34:7 38:15,22 44:20 48:15 guerin (3) 75:11,12 167:8	guidance (1) 64:20 guide (1) 103:9 guillotine (1) 107:15 guilt (1) 67:10 gulf (1) 133:9	H haddad (1) 81:13 hadnt (3) 10:19 66:17 179:1 half (1) 106:1 hammond (3) 172:21 174:5 175:4 hampered (1) 107:13 hampers (1) 106:7 hand (2) 11:6 70:15 handcuffed (2) 27:2 62:16 handcuffing (2) 27:23 62:12 hands (1) 55:7 hannah (1) 75:11 hannah (6) 93:16 96:20 137:15 164:22,23 173:25 happened (22) 3:22 6:3 26:14,21 33:13 48:18 56:10 59:17 128:12 129:17 131:23 133:25 137:2,18 142:20 143:5 159:22 160:9 161:22 164:22 165:18 173:24 happening (10) 42:2 47:11 67:2 108:4 144:25 168:7,11,15 170:21 172:25 happens (1) 114:9 hard (9) 5:16 20:11 23:9 41:3 54:14,17 58:21 119:7 178:18 hardedged (1) 39:13 hardly (2) 16:8 95:1 hards (1) 54:22 hardworking (1) 92:13 harm (7) 53:11 94:25 116:15 153:17 158:25,25 159:4 harmondsworth (1) 141:14 harris (1) 163:25 harrison (8) 146:7,11,12,13,14 175:7 178:23 180:5 hasnt (3) 34:14 38:15 68:1 havent (4) 29:23 30:10 36:15 70:1 having (20) 3:13 10:14 15:12 26:24 38:7 49:25 56:4 62:6 67:4 96:24 98:4 100:21 123:9 129:21 159:2,3 165:18 168:13 176:4 178:5 head (4) 42:20 77:4,21 79:13 heading (2) 110:15 121:23 headings (1) 102:13 headlines (1) 177:15 headon (1) 141:25 health (15) 19:8,17,19,22 20:3 54:3,7,15 96:11 99:20 128:4 159:6 169:6 174:3,7 healthcare (13) 18:4,25 19:1,4 20:1,5 26:5 36:6,14,18 50:9 135:12 137:23 hear (30) 1:20 2:5 3:24 9:7 17:5 19:3 21:12 24:9 45:24 47:5,16 74:20 76:22 77:14 81:8 83:15 92:19,25 110:14 112:6 124:15 127:10 132:13 136:4,5,6 143:22 146:6 170:3 171:6 heard (18) 60:22 92:11 100:21 116:13 129:4 147:17 149:18 152:1,13,18 156:25 161:17 164:15 167:14 171:1 176:1 178:5,14 hearing (69) 1:5,6,19 2:3,11,22 3:1,2,4,5,18,24 4:14,17 5:9 6:25 14:20 25:22 28:20 30:17,24 35:3 40:3,5,11,20 41:2 61:12 68:21 69:11 70:1 80:22,24 84:18 86:9 97:10 101:23	104:21,21 105:23 110:18 111:10 115:1,4 124:14 125:23 126:20,25 128:20 133:18 135:23 144:2 146:6 150:21 175:4,10,13,15,19,20,21 176:2,3 178:16,17,20 179:18,22,25 hearings (25) 1:13,15 2:23 4:2 8:22,25 39:15,22 68:13 80:1 98:10 103:14,14 105:4 106:6,17 124:16 126:2,13,16 127:22 134:25 136:19 143:25 151:11 heart (4) 9:10 121:18 129:15 148:1 heavily (1) 132:3 heavyhanded (1) 120:22 height (2) 89:11 91:25 held (18) 21:25 32:15,24 52:23 74:1 82:16 91:18,24 92:7,21 93:1,15 107:3 141:17 153:18 161:12 165:15 173:16 help (6) 39:20 40:4 102:25 128:22 146:2 168:21 helped (1) 43:4 helpful (12) 59:11 60:15 86:14 95:7 98:2,19 111:3 115:12 168:19 173:21 178:20 179:11 helpfully (2) 96:16 107:1 here (14) 14:13 48:12 59:22 87:19 93:20 94:17 103:10 111:20 112:10 114:10 120:16 123:20 163:2 172:25 hers (1) 173:4 hes (4) 116:5 169:7,17,17 hesitate (1) 136:16 high (5) 32:24 72:18 141:15,17 174:16 higher (1) 25:4 highest (1) 157:10 highlevel (1) 87:9 highlight (1) 85:13 highlighted (1) 90:13 highly (9) 32:3 72:11 80:17 115:16 159:1,16 160:2 163:2 167:16 hills (2) 167:23 168:8 history (7) 103:24 129:19 140:6,7,9 141:20 147:24 hobbs (3) 167:24 169:17,22 hoc (1) 20:18 hold (1) 127:4 holders (1) 91:21 holding (4) 21:11 22:8 93:4,6 holds (3) 81:9 83:11 108:8 home (91) 2:19 4:21 9:11,17 11:23 14:15 15:15 19:9 29:5 30:5 33:15 35:12,16 42:17,19 43:7 45:25 56:25 57:10 64:12 66:10,13,15 68:8,17,19,22 72:10,24 75:10,24 76:4,9 77:22,25 81:8 83:6 85:14,17,18 89:9 91:4 98:4,6 99:3 100:1 104:13,17,22 105:2,3,6,12 109:5 115:23 116:10 123:12 125:1,15,20 129:9 130:20 131:15,20 134:13 136:14 139:22 141:18 145:16 148:11 150:4 156:7,18 157:6,18 160:10 161:5 166:20 167:8 168:2,9,10 169:19,22 170:6 174:12,16,21,24 176:22 177:23 honeymoon (1) 167:24 honourable (8) 71:13,18 73:4,13,14,17,17 177:23 hope (12) 67:16 85:6 99:21,24 101:5 105:3 107:24 123:19 157:3 159:11 176:10 179:19	hoped (1) 43:8 hopefully (1) 178:2 hospital (16) 24:18 26:13,15,18,19,21,23,24 27:23,24 31:17 34:8 36:25 38:18 62:13,19 hospitals (4) 4:5 20:6 27:12 34:6 hostile (1) 24:15 hostilities (1) 24:10 hostility (4) 5:17 23:23 45:20 56:9 hotel (4) 75:22 88:3,6 161:13 hotels (3) 72:3 87:23 174:22 hours (11) 9:13,14,15 21:17,19 22:1,4,14 62:13 74:2 100:9 house (30) 33:16 48:4 57:14,19 58:5,12,13,16 59:2 64:3 85:17 87:23 105:12 121:12 129:10 133:22 134:3 138:13,16 141:4,12,14 142:4 143:9 150:8 153:19 155:24 162:21 169:10 171:4 however (21) 10:2 12:20 16:19 19:6 31:12,18 34:20 43:25 58:6,12 69:14 72:9,16 93:24 94:10 95:24 99:6,11,22 155:14 164:13 huge (4) 29:7 32:2 85:2 105:19 hugely (1) 36:3 hughes (4) 96:3,5 100:25 176:20 human (6) 32:15 41:18 50:3 125:16 134:2 138:8 humanitarian (1) 18:2 humanity (1) 23:23 humans (3) 146:24 161:20 163:8 humiliated (1) 160:18 hundreds (2) 48:13 114:3 hurdles (1) 105:21 hygiene (1) 19:11	I id (2) 119:12 124:23 identical (1) 105:11 identification (2) 90:9 94:13 identified (30) 29:1 50:1,6 70:2,3 79:9 83:3,13 106:21,22 110:1 115:19 116:16,18 118:12 119:2 122:22 125:18 127:6 147:22 166:10 168:3,6 169:1,14 171:15,23 173:13,15 174:5 identifies (1) 116:6 identify (14) 40:22 48:6 51:2 69:4 114:6,14 121:21 124:13 149:12,15 162:4 165:17 169:14 171:7 identifying (9) 27:7 66:23 106:5 134:17 148:8 162:15 164:18 167:25 169:9 identity (3) 67:4 160:20 161:2 ignorance (2) 139:12 142:2 ignore (2) 5:16 131:5 ignored (3) 31:2 48:11 169:15 ii (1) 19:15 ill (17) 14:18 30:22 38:24 55:4,7 56:16 60:16 70:15 85:6 102:14 110:4 118:20 121:25 146:6 152:15 160:4 167:5 illegal (7) 71:24 72:15,17 73:23 75:3 81:12 illegality (6) 12:6 88:15 148:20 163:4 168:24 173:6 illness (1) 27:22 illuminating (2) 73:5 111:16 illustrated (1) 109:3 illustration (1) 135:20	im (26) 1:10 22:23 54:24 60:16 70:14,14,20,22 101:9,10 102:8,12 115:1 116:22 124:4 147:21 172:19 175:15 176:11,15,20 177:1,13,22 179:16,18 imagine (1) 102:8 imbalance (1) 110:22 immediate (1) 105:6 immediately (4) 26:13 37:7 79:5 96:21 immigration (35) 5:24 15:9,11 44:21 47:23 57:3,8 58:2 62:24 63:1,2,10 76:3,21 80:16 91:8 93:2,3,9,14,17 116:4 129:18 131:4,13 140:13,14,15,25 166:21 167:14 171:11,12,23 172:8 immunisation (2) 24:23 25:1 immunisations (1) 19:20 impact (25) 8:10 51:21 52:3,25 53:5 72:15,20 84:11 85:25 88:18 90:16 93:23 95:17,22 96:9,11,11 113:9,10,19 119:2 131:8 152:8 157:10 160:14 impacts (6) 158:3,7,17 160:23 161:9 163:5 impede (1) 128:18 impeded (1) 105:23 impediment (1) 87:6 imperative (1) 142:17 implementation (2) 148:13 165:11 implemented (1) 162:3 implicated (1) 46:24 implications (1) 47:12 importance (9) 7:9 23:15 41:19 42:5 117:3 147:19 153:24 172:15 174:5 important (38) 6:17 7:16 8:5 22:11 25:4 28:2 34:22 35:3 42:3 56:14 65:5 72:16 79:20 81:2,8 82:12 112:7 114:7 115:8,24 116:13 117:4 119:19 137:4 147:16 158:23 159:4 161:15 168:16,17,25 171:2,6 172:24 173:6,22 175:2 176:7 importantly (7) 89:4 92:1 97:6 108:19 118:8 125:5 152:7 impose (1) 145:12 impossible (4) 23:10,14 89:22 92:14 improperly (1) 122:9 improve (1) 136:16 improvement (1) 140:11 impunity (7) 148:16,17,17 162:10 163:4 168:22 170:5 inability (2) 99:22 127:24 inadequacies (1) 162:1 inadequacy (1) 127:19 inadequate (3) 15:17 90:19 153:17 inappropriate (5) 13:21 64:13 119:24 120:1 122:6 inappropriately (1)
---	---	--	---	--	--	---	--	--	---

including (29) 8:19 9:12 16:16 19:5,20 20:23 26:12 32:3 34:8 47:19 49:15 51:21 66:24 71:24 73:3 75:2 76:17 77:8,24 100:4 112:15 113:3 118:14 121:13 123:10 129:18 130:6 145:8 153:19 inconsistent (1) 101:15 incorporated (1) 34:18 incorrect (5) 160:15,24 162:8 163:9 170:2 increase (2) 91:7 120:23 increases (1) 39:18 increasing (4) 10:12 11:22 68:12 99:23 incredibly (1) 178:19 inculate (1) 48:25 independence (2) 6:11 13:14 independent (6) 6:10 47:23 141:12 158:5 159:17 173:14 index (1) 180:1 indicate (10) 4:18 89:1,3 101:10 151:16 157:6 176:23 177:4,10 178:15 indicated (19) 4:23 30:5 65:18 99:14 107:9 108:7,9 113:11 115:15 148:22 150:19 151:18 152:4 153:20 154:12 155:9 167:6 175:21 178:9 indicates (5) 67:17 88:6,22 91:9 119:23 indicating (2) 156:3 177:19 indication (5) 88:10 106:15 126:12 135:4 157:2 indications (2) 90:17 171:20 indifference (1) 23:23 indispensable (1) 87:2 individual (20) 7:15 16:14 36:23 43:6,16 44:7 63:23 108:16,23 121:14 130:3 133:18,24 138:15 139:14 142:23 150:17 158:9 163:8 176:13 individually (1) 83:1 individuals (26) 7:14,18 25:2 31:12 45:8,16 78:21 86:14,18 89:25 134:18 140:24 146:16,17 156:10,11 158:7 161:21 167:13,25 170:8,14 171:7 172:10,20,22 indulgence (1) 144:21 industry (1) 12:18 inevitable (1) 58:3 inevitably (2) 103:12 153:1 infection (1) 19:14 infectious (3) 18:6 24:20 128:5 infer (1) 49:8 inference (1) 164:13 inferences (2) 46:10 57:13 inform (3) 30:20 37:16 107:10 information (11) 25:15,17 35:23 154:12 156:9 160:1 171:8 172:5 173:20,21 179:8 informed (6) 35:11 65:21 160:1 164:24 169:22 170:14 informing (1) 156:18 ingham (1) 79:3 inherent (1) 8:23 inherently (1) 117:7 inherit (1) 142:8 inhibit (2) 58:24 118:8 inhibited (2) 5:22 117:6 inhibition (1) 131:11 initial (4) 18:24 27:8 72:21 161:23 initially (1) 18:17 input (4) 143:3 144:24 150:16 179:6	inquest (6) 35:8 140:8,21 147:5,23 154:1 inquests (1) 144:14 inquiries (14) 3:5 8:7 32:10 38:1,2 112:2,5,6 114:6 118:7 148:19 155:23 156:22 166:25 inquiry (479) 1:5,5,8,10,12,14,15,17,22,25 2:2,12,15,17 3:19,22,25 4:4,7,9,11,14,15,17 5:8,10,16,20 6:1,3,6,9,10 7:4,5,8,22,23,25 8:3,13,16,19,25 9:8,10 10:3 12:21 14:2,22 15:2,6 17:2,5,6,9 20:4,8,9,11,13 23:11,15,20 24:12 25:12,14,17,18,19,20,22 26:1 27:4,7 28:3,3,6,9,12,14,16,20,24 29:1,8,14,19,25 30:3,7,8,9,15,19,20 31:2,3,5,16,22 32:2,6,15,22 33:11,16 34:29,14 35:1,9,11,16,18,22,23,25 36:7,9,11,12,16 37:1,4,9,10,13,20 38:5,6,8,12 39:3,7,11,21,22,23,25 40:10,13,14,15,19 41:7,9,13,14,21,23 42:1,13,13,18,25 43:5,11 44:11,16,17,25 45:6,13,15,17 46:4,6 48:2,12 49:11,16,21,23 50:13,20,23 51:2,5,22 52:4 53:19,20 54:2 55:13,21 56:12,15,18 57:14,17,22 58:1,17,18,18,21,23 59:2,3,6,18 60:18 61:4 62:18 63:7,12 64:1,5,7 65:6,10,15,21,25 66:1,5,9,12,22,25 67:6,11,20,21 68:1,4,5,6,7,7,10,14,16,19,24 69:3,4,6,8,18,21,23 70:9 71:16 72:5,13 73:1,15 74:2,4,9,24 75:14,19,19 76:1,9,11,14 77:4 78:6,9,17,22,23 79:4,21 80:1,3,7,14,17,19,25 81:9,21 82:4,6,17,21,24 83:2,3,10,10 84:1,3,9,16 85:1,4,6,11,12,18,24 86:7 88:17 90:2 91:3,19 92:19,25 94:10,20 95:2,14 96:15,22 97:9,14,20 98:8,20 99:12,24,25 100:2,12 102:15,24,25 103:4,12,16,20,24 104:11,23 105:12,18 106:5 107:10,12,17 108:2 109:8,17 111:4,10,14,25 112:2,12 113:11 114:1,16 115:9,16 117:21,23 118:13 119:17 121:12,19 123:6 124:20,25 126:13 127:1,4,5,6,12 128:11,22,23 129:5,10,21,25 130:2,12,15,23,24 131:23 132:13,19 133:8,16,22 134:5,17,24 135:1,1,5,10,11,18 136:1,3,21 137:22 138:3,11,14,16,25 139:5,13 142:4,12,22 143:19,22 144:15,19,22 145:1,2,4,6,20 146:14,17,25 147:12 148:3,3 149:10,21 150:8,11,24 151:2,11,25 152:2,17,21 153:2,8,21,25 154:9,21 155:10,25,25 158:5,14,24 161:8	162:22,24 163:7 164:4,10 165:8,17 166:12,15,23 167:6,9,19 170:3,18 171:4 172:12 175:3,11,17,17,22,23 176:17,25 177:2,3,7,9,12 179:1,7 inquirys (44) 1:23 4:25 7:13 9:6 15:3 25:8 28:14 31:9 34:18 36:19 37:16,17,22 39:14,18 40:2,7 42:9 43:4 54:13 58:9 67:8 71:8 73:20 74:14 77:1 79:25 80:3,5 81:15 97:25 98:2 105:24 106:9 107:4 122:2 123:10 124:10 125:3 126:7 132:15 140:6 156:13 172:16 inquisitorial (1) 7:12 inside (1) 61:25 insight (3) 133:25 136:25 169:12 insist (1) 132:17 insofar (5) 6:2 46:6 56:12,15 83:13 inspector (2) 80:15 174:3 inspectorate (2) 141:12 173:2 instance (1) 16:18 instances (7) 107:4 108:13,16,23 119:20 120:8 121:15 instead (2) 34:19 163:20 instinct (1) 140:4 institution (3) 139:25 168:1 169:13 institutional (46) 49:14 55:9 56:13,25 57:15,18,21 58:7,11,22 59:3 118:23 122:17 125:6,25 127:16 128:15 134:21 137:2,16,21 138:1,20 139:5 142:1,3,5,13,19,21 143:3 144:24 145:19 147:20 148:9,15 152:11 160:5,12 161:18 164:19 165:19 166:3,13,13 171:4 institutions (4) 124:25 139:23 159:7 168:23 instruct (3) 58:6 95:15 145:19 instructed (5) 20:12 94:1 96:14 143:25 146:14 instruction (5) 49:22 50:2 51:24 54:14 118:23 instructions (1) 99:7 insufficient (3) 12:7 19:24 29:17 intake (2) 77:21,23 integral (1) 163:12 integrated (1) 173:14 integration (1) 170:11 intend (1) 52:15 intended (4) 29:21 39:20 55:11 111:16 intending (1) 102:13 intends (4) 40:16 78:17 132:13,16 intensive (1) 85:2 intention (2) 107:6 145:15 intentions (1) 141:2 interacted (1) 65:17 interagency (1) 79:10 interest (3) 94:14 147:8 167:9 interforce (3) 42:23 44:21 120:15 internal (1) 39:13 internally (1) 168:6 interplay (1) 84:15 interpretation (1) 118:3 interpreter (1) 117:22 interpreters (1) 117:23 interrelationship (1) 174:11 interrelationships (1) 166:2 intervention (1) 128:2 interviews (1) 44:22	intimidating (1) 122:7 into (33) 10:9 15:21 23:10,13 25:10 32:22 36:18 37:3 38:18 49:12 59:18,18 64:1 66:8 67:25 75:13 82:1 117:15 133:25 134:1 135:15 136:25 146:21 151:3,14,17 154:1 155:22,25 157:21 161:8 169:12 179:6 introductions (1) 149:7 introductory (4) 1:3 3:13 149:17 180:2 intrusive (1) 35:21 investigate (13) 15:14 24:13 37:18 56:25 58:7 59:7 64:5 72:13 87:3 112:13 113:22 119:17 138:3 investigated (4) 85:11 95:2 111:14 132:10 investigates (1) 56:18 investigating (9) 4:9 5:22 12:21 36:16 48:3 60:13 61:5 74:24 79:4 investigation (30) 4:13 11:25 25:9,10 28:5,9 32:8 33:17 35:6 58:8 77:1 90:6 113:3 119:15 124:21 125:5,13 163:17 164:18 165:4 166:22 168:17 170:13 171:24 172:24 173:20 174:18 176:7 178:4 179:4 175:3 investigations (8) 9:4 33:21 46:3,4 57:2 141:24 142:12 148:20 investigative (2) 90:3 94:17 investigatory (1) 32:16 invite (9) 30:23 82:5 84:8 107:14 114:15 115:2 117:23 118:13,16 invited (3) 4:18 16:13 127:15 involved (9) 28:8 34:6 41:4 42:15 43:19 48:7 75:5 88:22 111:11 involvement (10) 71:23 72:6 73:21 74:14 75:21 79:4 87:10,11,12 167:17 involves (1) 33:9 involving (3) 17:7,15 122:10 inward (1) 83:4 ip (1) 97:2 ips (15) 69:21 83:16 86:12 96:17 97:1,4,11 102:6,22 103:17,25 106:3,14 107:10 149:19 iraq (1) 33:2 irrespective (1) 158:19 irritants (1) 134:22 island (1) 179:22 isnt (6) 51:11,15 66:3 67:1 140:9 158:8 isolated (1) 134:22 isolating (1) 122:9 isolation (1) 120:9 isotope (4) 72:1 74:18 79:1,14 issued (5) 2:22 177:14,16 178:8,10 issues (77) 5:3 6:15,18 7:4 10:3 22:3 26:4,21 27:16 31:19 37:2 38:25 43:5 47:25 51:2,7 52:6 55:11,14 56:4 58:3 59:2,5,19,23 60:14 62:17 63:14,24 64:16,24 65:1 67:17 80:11 84:4,4,18,23 87:4,5 89:17,23 94:11,22 98:13 102:14,16,20 103:5 110:16 113:23 114:1,19 115:9 120:16,20 121:5,14,16 122:14,22,24,25 124:18 125:12 132:7,8 138:21 151:8 153:4,6 159:10 162:11 167:10 168:24 174:13 176:10 item (1) 93:19	iteration (2) 110:23,25 itn (2) 66:10 109:6 its (127) 1:22 4:8 5:19,20,23 6:11 7:23 9:10 11:9 15:23,24 16:16,19 18:21 20:4 22:11,17 25:4,9 28:1,10,17 29:6 30:4 31:25 32:7,16 34:13,21 35:15 37:22,25 38:3,5 40:8,20,24 41:7 43:13 52:7 53:15 55:12 56:15 57:11 59:23 64:20 65:5,6 67:22 69:9 70:6 72:16 78:22 82:2 85:2,4,15 86:6,20 89:12,22 101:2,14 102:9,20 103:13,18,21 104:23,24 105:3 106:12 107:14 108:14 110:20 112:1 114:23 116:13 117:4,9 118:7,19 124:21 125:12,22 126:14 127:11 131:20 134:13,25 135:24 137:11 142:24 147:13 148:12,12,12,13,13,19 149:5,14 151:16 152:18,25 153:3,5,25 154:13 156:6 158:23 160:25 161:1,9 163:17 164:18 165:4 166:22 168:17 170:13 171:24 172:24 173:20 174:18 176:7 178:4 179:4 itself (7) 72:20 89:16 108:18 126:7 139:10 143:11,14 itv (2) 66:10 109:6 ive (24) 1:11 22:24 28:1 38:14 43:16 56:7 57:10 58:20 59:24 67:20 89:23 90:25 97:8 116:3 134:20 141:8 155:9 176:1 178:3,7,8,9,13 179:14	justifying (1) 156:4 K kc (6) 83:16 85:3 92:12 96:17 150:19 157:2 kcs (1) 99:4 keep (8) 72:11 74:7 75:7 76:7 128:22 136:12 145:14,18 keeping (2) 10:24 64:20 kennedys (4) 65:18,21,25 66:3 kent (11) 4:5 19:8 66:6 77:23 109:4 173:14 174:7,12,16,20,24 kents (1) 174:18 kept (3) 73:7 78:12 135:5 kershaw (1) 81:17 key (19) 47:21 73:2 75:13,18 85:23 86:5 89:5 91:22,25 92:7 100:1 122:14 148:1 152:20 155:1 156:8 169:8 171:3 174:13 kicked (1) 62:2 killingley (4) 25:23 26:3 27:4 37:3 killingleys (2) 26:10 27:9 kind (7) 63:16 93:8 121:9 168:21 171:15 172:11,12 kinds (1) 158:19 kingdom (1) 163:18 kingfisher (1) 170:9 kings (5) 2:1 70:21 146:7,11 178:23 kit (1) 73:17 knee (1) 120:5 knew (2) 41:24 74:1 know (17) 17:14 29:25 30:10 31:5 36:23 46:7 47:11 51:22 53:18 62:8 67:19 68:8 102:4,23 108:14 134:14 158:10 knowing (2) 82:18 108:23 knowledge (4) 50:2,5 92:19 96:13 known (7) 41:20 57:7 74:3 101:20 141:18 163:4,13 knows (2) 146:14,25	L labourintensive (1) 40:25 lack (21) 9:25 20:21,22,24 21:12 27:16,19 31:25 46:13 55:16 63:8 68:3 99:5,9 113:9 120:11 121:4 133:14 148:13 154:17 174:13 lacked (1) 46:14 lancaster (2) 73:11 91:19 language (10) 14:3,9 16:21,21 44:25 45:17 56:8 59:21 122:5 133:20 lapse (1) 85:10 large (1) 12:16,17 16:8 21:9 48:13 108:12 114:4 149:25 158:25 159:20 largely (1) 24:23 largest (2) 93:12 98:15 last (4) 28:20 30:9 70:5 145:22 lasting (2) 142:10 144:15 late (14) 26:25 37:24 75:23 86:2 97:17 103:5 104:1 107:13 126:16 127:11 128:21 144:2 145:11 154:4 lateness (1) 128:14 later (9) 14:18 82:5 85:24 110:9,25 111:1 134:25 154:6 172:5 latest (1) 68:21 lawful (1) 172:2 lawrence (1) 57:22 lawyer (1) 76:15 lawyers (1) 6:9 lead (1) 153:21	leadership (15) 21:6 22:16 46:20 48:25 60:12 87:8 113:8,10,13,16,18 137:18 148:5,12 165:22 leading (3) 59:21 71:23 90:9 learn (1) 141:9 learned (11) 27:3 51:22 65:2 66:20 83:15 90:15 142:1 143:1 149:15 152:3 155:18 learning (1) 131:16 least (13) 10:4 36:7 67:16 87:12 103:23 108:12 122:13 154:17 157:3 159:12,20 163:9 166:17 leave (4) 55:7 61:8 136:19 145:9 led (6) 24:12 56:20 78:25 113:18 138:6,18 left (4) 62:17 70:5 105:21 123:14 legal (52) 1:8 6:16,17,20 12:5 18:2 22:7 36:16 37:4,20 39:7,22 40:4 41:4 42:13 45:6 49:19,21 51:5 54:16 59:6 62:6,24 64:7 65:17 68:10 69:23 76:11,16,17 78:23 82:24 83:3 86:15 92:24 93:8,12,12,13,21 97:2 98:12 99:1 100:2 148:20 154:21 155:19 164:14 175:17 176:17,25 legality (1) 12:13 legally (1) 13:4 leggatt (2) 41:16,17 legislation (1) 156:15 legitimate (1) 57:6 length (5) 11:25 12:10 14:8 117:2 132:12 lengths (1) 18:8 lengthy (1) 8:22 lens (5) 20:4 48:12 55:22 113:11 138:12 less (7) 8:9 74:18 123:2 134:2 135:8 138:8 162:7 lessons (6) 131:16 141:9 142:1,25 145:23 149:15 let (1) 36:23 letter (8) 54:14 77:2,9,13 100:13 121:11 177:25 178:2 level (12) 29:9 34:14 72:18 89:18 113:10 116:9 132:5,20 140:1 159:3 168:1 172:1 levels (5) 5:15 47:1 125:19 165:6,10 lever (1) 35:3 lewis (16) 2:13 82:20 83:17 84:1 96:24 97:20,21 98:6,12,17 99:15,17,23 100:11,12,16 liability (2) 7:14 112:3 liable (1) 120:22 liar (1) 160:18 liberty (1) 172:10 lie (1) 137:24 lies (1) 90:1 lieutenant (2) 9:16 46:17 lifethreatening (1) 27:22 light (7) 21:7 65:9 74:20 88:20 92:1 154:11 178:25 like (23) 8:15 17:1 18:6 36:13 40:13 44:1 45:24 46:1 47:17 59:22 63:24 101:5,15,18 108:25 119:12 124:23 128:8 131:7 134:1 141:10 145:9 151:11 likely (11) 15:4 33:21 52:20 72:11 80:11,17 115:16 117:5 131:8 154:4 162:6 likes (1) 136:6 limit (4) 9:23 107:4 136:2 151:14 limitations (1) 19:4 limited (11) 14:23 22:3 28:2
---	---	--	--	---	--	---	--

65:7 69:24 76:12 82:11 109:5 114:14 130:25 135:13 limits (6) 91:12 92:4 106:4 110:17 135:9 151:3 line (2) 47:8 88:7 lines (1) 4:12 link (2) 118:14 159:6 linked (1) 63:24 links (1) 137:17 linton (1) 89:2 list (35) 5:6 40:3,15 43:19 44:5 59:5 70:7 71:4 80:4,5,9,12 81:5,20 82:5 84:14 87:4 93:19 97:3,4 110:16,20,24 114:19 115:20 116:2,19 132:3,7 140:9 152:16 167:22 169:7,17 176:17 listened (1) 119:5 listing (1) 145:11 litany (1) 148:23 literature (2) 160:22,25 litigation (4) 94:11 95:4,10 98:6 little (6) 16:3,9 70:15 71:16 75:5 117:22 live (1) 118:14 lives (4) 8:15 128:3 145:6 153:16 livestreamed (1) 3:2 living (3) 10:4 60:9,10 local (2) 26:15 48:14 location (1) 118:15 lockable (1) 18:19 logic (1) 137:25 long (2) 38:2 114:18 longer (7) 20:19 21:25 93:1,7,16 107:4 174:18 longstanding (4) 142:18 148:24 162:12 163:3 look (9) 20:4 56:17 64:18 96:10 113:13 135:21 147:9 157:25 173:12 looked (3) 55:22 59:4 108:25 looking (1) 150:21 looks (2) 91:5 101:5 looms (1) 23:19 loss (2) 99:23 142:15 lost (3) 42:4 142:7 143:2 lot (2) 114:22 145:21 lower (1) 92:13 lowest (1) 5:15 luckily (1) 115:11 luh (12) 118:25 123:22 124:4,5,6 147:22 148:22 152:4 162:12 164:16 166:11 180:4 lunch (5) 83:21 101:22 111:21 123:18 179:20 luncheon (2) 100:19 101:1 luxury (1) 127:12 lying (1) 23:5	management (8) 2:4 19:15 28:17 47:8 116:1 120:20 121:17 133:23 manager (9) 43:15,18,23 44:6 46:2 78:4 132:14 169:6,20 managers (2) 132:11 140:19 mandated (1) 164:22 manifest (1) 143:14 manipulated (1) 12:5 manner (3) 153:5 162:4 173:16 manston (153) 1:5 3:19 4:22 6:5 9:19 10:7,11 13:4 14:24 17:12,21 18:9,13 19:5,12 20:5,21,23 21:14,15 22:6,9,18,22 23:20 24:4,5 26:5,7,10,17,19 27:12 28:8,25 34:6 35:20 36:6,25,25 37:6 41:15 42:2,15,20 43:25 45:3,10 46:20,21,25 47:2 48:14 49:1,4,9 50:9 52:5,17,20 53:1,6 54:16 55:15 59:7,17 60:6,8 61:22 62:16 65:11 69:5 71:10,22 72:5,7,16,18,20,23 73:7 74:4,12,14,17,22 75:13,14 76:11,17,17,20 77:7,18 79:14,15 81:2,6,16,18 84:12 87:8,11,12,25 88:5,15,23 89:4,6,16 90:20 91:12 92:8,22 93:4,17,23 95:21 96:10 108:21 112:13,14,15,16 116:8,15 119:21 125:14,21 127:23 128:5 129:17 131:23 132:5 133:1 138:20 139:17 142:20,23 146:16 148:2 153:19 154:19,19 158:22 161:12 164:2,23 167:2 169:20,23 173:2 many (18) 8:23 10:24 36:6 37:8 48:15 64:3 114:9,9 117:7 121:14 127:23 131:7 149:3 153:20 162:11 164:2 165:14 175:1 march (2) 126:16 145:12 marked (1) 28:11 masks (1) 3:13 marquee (5) 16:9 18:18 26:19 27:17 31:21 marquees (8) 10:8 12:7,19 15:17 18:16 19:2 31:15 108:25 marsh (1) 171:12 mass (1) 24:23 material (18) 30:11,14 35:15,17 63:8 75:2 83:4,6,7,11,12 104:2 106:4 107:16 109:15 126:23 136:14 160:22 materiality (4) 76:21 77:13 78:21 136:15 materials (5) 20:11,15 30:7 32:3 35:10 maternity (1) 19:23 mats (1) 173:18 matter (22) 2:5 14:21 23:14 27:15 37:11 50:4 52:12 56:11 61:7 62:14,16 75:6 76:13 100:10 101:3 103:22 104:13 107:7 135:15 159:8 160:9 178:22 matters (47) 2:3 4:16 5:22 9:7 11:25 28:1,13 31:12 41:8 43:20 50:10 51:19 54:18 56:22 64:21 70:16,22 71:6 76:5 78:5,10 79:12 95:1 100:3 103:8,21 108:21 109:12 111:22 121:18 122:11 125:8 129:18 134:20 137:24 141:20,20 144:10 145:20,21 150:20	154:13,14 164:12,12,15 178:11 matthew (1) 172:21 maxwellisation (1) 103:15 mcclymont (2) 43:23 44:12 mean (3) 62:7 69:13 132:20 meaningful (2) 33:5 94:16 means (4) 14:17 41:9 68:3,7 meant (3) 10:5 12:11 165:14 meantime (2) 124:18 144:20 meanwhile (1) 92:7 measure (1) 47:24 measured (1) 144:18 measures (17) 69:9,22 70:4,8,11 84:14 94:13 116:23 117:17 119:10,11,16,19 121:4 125:8 150:10,12 medevent (23) 18:12,13,24 34:15,17,21 35:5,6,10,10,20 36:22 37:5,10,10 127:22 128:9 136:5 153:6 154:13 178:24,24 179:9 medic (1) 16:6 medical (22) 18:10,12 19:16 20:13,15 21:1,3 26:6,20 35:13,19 36:1,9,11,24 54:5 63:22 127:19,24 138:10 153:13,18 medication (2) 19:17 128:7 medics (2) 16:4 66:3 medway (1) 173:14 meet (5) 32:7,13 49:2 57:10 156:4 meeting (5) 7:19 68:20 100:2 149:14 153:25 meetings (1) 92:2 meets (1) 32:8 member (6) 13:21 14:1 16:3,7,20 25:14 members (2) 52:8 71:9 memory (2) 41:18,24 mental (3) 19:22 96:11 159:6 mention (1) 3:10 mentioned (4) 75:25 92:17 99:16 141:8 mere (1) 129:14 merely (1) 121:14 met (6) 52:10 54:16 106:22 126:6 128:2 133:4 meticulous (1) 85:2 michelle (2) 172:20 173:1 microphone (1) 102:7 microphones (1) 101:21 midafternoon (2) 124:2 146:5 midjanuary (1) 35:11 midlevel (1) 133:23 might (30) 13:18 34:14 39:24 42:4 46:7,10 51:7,12 54:19,21 55:2 57:3 64:17,24 65:3 66:20 68:8 69:10,13,16 74:20 75:4 76:22 104:17 106:19 108:1 111:19 114:5 157:20 175:1 migrants (2) 11:18 137:18 migration (11) 5:13 28:18 71:24 72:1,15,17 73:23 75:3 81:11,12 115:18 military (3) 32:25 71:25 79:9 mind (2) 101:2 124:23 mindful (1) 38:1 minds (1) 126:25 minimise (1) 55:11 minimising (1) 62:4 minimum (1) 90:5 minister (5) 71:14,19 73:6 88:8 135:10 ministerial (4) 24:3 89:18 116:9,11 ministers (23) 18:1 22:16 31:6 60:7 68:22 71:13 72:12 73:3,10 74:4,8,13,25 86:25 87:17,21 91:4,10,16 92:10 152:24 156:8 170:13	ministry (6) 2:20 4:21 29:13 43:13 78:15 135:22 minority (1) 100:5 minute (2) 70:5 123:1 minutes (6) 55:4 61:9,12,19 82:11 121:25 mirrored (1) 141:7 misconduct (24) 13:20 24:12 29:6 33:1 44:23 45:14,19,20 46:1,24 47:14 48:22 67:10 102:18 112:20,23 121:24 122:15,20 132:9 137:16 142:6,23 148:25 misleading (2) 170:1 172:4 mispronounced (1) 116:3 missed (2) 27:11 179:20 missing (7) 82:13,16,22 83:1,4 166:25 170:18 mistreat (1) 57:4 mistreatment (6) 45:4,14 48:5 49:6 138:15,19 misunderstanding (2) 109:9 179:3 mitie (17) 11:23 12:7 13:22 18:14,16,20 19:3 31:14 42:23 43:22 44:4,6,8,10 62:19 108:8 132:15 mities (2) 65:14,17 mitigate (1) 64:14 mobilisation (2) 43:23,24 mocked (1) 160:18 mod (5) 29:20,21,24 79:16,23 modelled (1) 129:8 modest (1) 144:12 mods (1) 79:4 moffatt (21) 2:1 5:2 13:17 39:6 70:15,24 71:1,2 83:18 87:9 88:24 90:15 91:12 92:18 115:11,15,19 116:18 132:16 179:16 180:3 moment (9) 1:25 6:8 30:19 55:6 70:18 103:22 106:3 107:10 111:3 monday (1) 177:10 money (1) 137:10 monitored (1) 63:21 monitoring (2) 13:16 42:20 monopoly (1) 7:8 month (9) 20:2 30:17 106:11,13,16 124:12,12 126:11 130:4 monthly (1) 56:3 months (12) 10:6 20:10 30:15 40:20 41:2 79:6 85:15 104:3 107:5 123:5 129:5 146:23 moral (1) 116:12 morale (1) 46:16 more (53) 5:2,20 7:25 9:15 11:6 13:18 21:12,24 23:2 24:9 29:25 41:11,24 42:9,10,14 43:2,5 44:19 46:25 50:15 57:1 59:19 60:5 61:9 62:17 65:7 69:22,25 71:9 74:21 75:15 82:11 86:8 94:22,22,23 95:1,1 99:17 118:21 126:14 129:4 135:20 142:25 143:23 144:16 151:19 157:13 160:6 162:6 170:24 173:7 moreover (2) 89:1 99:9 morning (13) 1:4 27:1 102:19 106:12 107:9,21 108:6 116:24 119:4,23 122:4 125:18 126:12 morris (4) 44:14,16 132:14 136:7 most (19) 33:21 39:17 40:22 45:5 52:5 86:8 97:6 111:15 119:19 125:5,19 135:13 137:3 144:21 151:1 171:3 172:1,8,14 mother (1) 16:4	motion (1) 27:7 motivations (1) 163:21 mousa (1) 32:23 move (4) 40:12 68:12 91:17 143:4 moved (1) 116:8 moves (1) 140:17 moving (2) 127:1 128:23 mp (4) 71:18 73:15,17,18 mpr (1) 107:3 ms (135) 1:25 2:1 3:14,16,17,18 5:2 13:17 39:6 43:23 44:12 55:4,7,9 61:10,18,19 70:15,20,23,24 71:1,2,2,7 75:12 81:21 82:9 83:16,18,19,23,24,25 85:3 87:9 88:1,2,21,24,25 89:9 90:15,22 91:9,12 92:12,18 96:17 99:4 100:18,19 101:8 102:18 103:4 104:16 105:9 106:11,20 107:20 108:3 109:3 110:1,7 111:4,18,24 112:18 113:10 115:11,15,19 116:18,18,18,24 118:25 119:3,23 120:2,6,16 121:24 122:1,3 123:22 124:4,5,6,6 125:18 128:24 130:24 132:16 133:16 135:4 137:5 138:11 139:21 146:7,11,12,13,14 147:22 148:22 150:19 152:4,19 154:12 156:25 157:2 159:18 160:1 162:12 163:24,25 164:16 165:8 166:11 167:8 174:1,5 175:4,7 178:21,23 179:13,15,16 180:2,3,3,4,5 mtc (7) 14:2 16:20 43:15,18 44:1 46:2 66:9 much (22) 3:22 23:2 37:23 43:19 48:12 58:8 59:19 61:4 74:19 97:14 101:24 122:24 123:17 138:12 142:15 146:4,7,12 151:17 164:21 167:1 175:7 muchneeded (1) 117:19 multiagency (1) 79:1 multifaceted (1) 161:18 multifactorial (1) 117:8 multiple (8) 13:25 15:4 52:20 57:8 88:1 98:23 105:21 120:16 murphy (9) 2:18 32:5 49:15 53:14 82:23 146:15,24 149:21 170:24 murphys (2) 101:3 135:16 must (23) 6:3,17,18,20 7:23 10:3 15:24,25 16:1 27:24 30:20 50:18 96:10 97:7,10,11 107:10 134:14,24 138:3,24 147:13 149:6	nearby (1) 124:13 neat (1) 10:2 necessary (35) 8:1,17 32:24 36:4 39:8 41:11 50:15,23 51:2,10,12,15,18 53:8,9,23 63:5 67:1 94:6,6,9,21 95:5 137:6,7,12 143:23 144:6,7 145:8 155:16,22 159:22 166:7 170:19 necessitate (1) 33:18 necessitates (1) 60:14 necessities (1) 10:15 necessity (3) 9:2 37:25 94:5 need (63) 5:24 8:20,21,24 11:6 15:12 27:5 31:22 33:18 40:12 42:14 44:13 45:8 53:5 59:7 64:22 67:14 69:3,16 70:19 78:2 80:19 83:14 84:14 87:20 88:13,18 93:22 94:10,24 98:18 99:12 100:24 112:3 113:14 115:13 118:1 122:16,21 125:6,13 127:18,22 128:24 136:4,5,6 143:15,25 147:18 150:10,12,20,21,22 151:14,17,21 155:14 157:20 165:4 176:5 179:6 needed (17) 12:10 69:14 94:15 110:12 111:7,7,20 117:23 118:15 125:4 137:23 138:23 151:1,19 152:5 178:5,11 needing (2) 143:17 154:20 needs (19) 30:15 41:9 52:10 54:7,15 69:20 70:2,13 103:16 114:12 118:2 124:25 126:18 133:8,21 135:2,20,21 145:7 neil (1) 167:24 neither (2) 86:7 169:23 net (1) 12:23 network (3) 146:25 161:21 163:8 neutral (2) 59:14 126:6 never (3) 88:24 142:11,25 nevertheless (2) 126:24 168:24 next (12) 40:12 75:9 105:15 107:20 118:18 123:22 131:22 144:18 176:16 177:15,17,24 ngo (3) 146:24,25 161:20 ngos (1) 147:11 nhs (1) 173:13 nicholls (12) 84:2,12,20 102:3,4,7,8,10,11 123:17,21 180:4 nielson (1) 44:4 night (1) 26:25 nine (3) 10:20 99:18 169:7 noncompliance (3) 148:21 162:16,18 noncontroversial (1) 129:8 noncooperating (1) 134:20 noncooperation (1) 155:17 nondetained (1) 72:8 nondisclosure (1) 109:22 none (2) 69:22 86:10 nonengagement (1) 135:12 nonetheless (3) 28:3 34:20 82:12 nonstatutory (5) 38:1,6 112:5 135:1 155:22 nor (7) 6:12 7:15,17 38:12 89:19 136:1 169:24 normalise (1) 139:20 normalises (1) 134:9 nose (2) 23:7 26:17 note (29) 4:15 14:20 15:2 29:12 30:11 34:13,16 36:21 39:11 52:16,18 57:24 58:16 80:5 86:1,3,14 98:8 102:19,23 104:5,21 105:2,22 116:25 120:9 122:4 138:25 177:7	noted (8) 1:14 10:22 27:3 57:20 59:24 60:2 63:8 175:22 notes (5) 35:13,13 69:15 153:8 171:8 nothing (3) 48:8 55:11 145:23 notifiable (1) 24:20 notification (1) 24:21 notified (1) 70:7 notify (1) 69:21 noting (1) 19:9 notions (1) 163:22 notwithstanding (1) 103:10 novel (1) 143:8 november (14) 4:11 19:7 26:23,25 27:1,6,22 31:17 34:8 56:21 72:7 89:10 125:23 153:14 nowhere (1) 11:12 nuanced (1) 157:21 number (43) 3:3 10:12 12:16,17 13:1 28:4,7 29:10 31:7,18 36:17 39:2,9 45:12 47:8 48:13,23 63:3,13 67:21 68:2,20 74:14 75:3 76:2 87:14 90:23,25 91:1,6 99:13 107:22 108:17 114:4,15 115:8 116:6 118:7,12 123:5 169:7,17 171:13 numbers (4) 11:22 20:18 21:9 159:1 nutritional (1) 19:21 nutritious (1) 15:18			
					O				
					oakington (1) 140:17				
					oakley (1) 143:8				

occurs (1) 149:6 october (18) 11:2,10 18:8,12 30:6 71:20 73:12,13 77:3,9 100:14 123:13 130:10 169:20 176:22 177:4,8,10 offer (1) 47:12 offered (1) 128:17 offers (1) 94:3 office (82) 2:19 4:21 9:11,17 11:23 15:15 29:5 30:1,5 35:12,16 42:17,19 43:7 45:25 56:25 57:10 64:12 66:10,13,15 68:8,17,19,22 72:10 73:2 74:10,13,25 75:8,10,24 76:4,9 77:22,25 81:8 83:6 85:14,17,18 91:10,23 92:2,7 98:4,6 99:3 100:1 104:22 105:2,3,6 109:5 125:1,15,20 129:9 131:20 134:13 136:14 139:22 141:18 145:16 150:4 156:7 157:6,18 160:10 161:5 166:20 168:2,9,10 170:6,11 174:12,16,21,24 176:22 officer (7) 63:1 81:18 134:3 139:14 169:21 171:11,12 officers (23) 12:10,15 13:25 14:5 32:18,19 44:8 47:22 62:24,25 63:3,10 65:16 122:7 133:1,18,19 135:24 136:6 139:19 140:20 171:23 172:8 offices (8) 92:3,5 104:17 116:10 130:20 131:15 148:11 156:18 official (2) 19:7 74:25 officials (29) 17:25 23:10 29:15 30:2 42:19 44:22 45:25 48:15 60:7 68:21,22 72:24 73:3 74:11 75:10,25 76:2,9 78:1 80:25 91:10 92:10 111:17 116:10 122:25 129:20 139:21 148:25 156:19 often (6) 9:13 41:22 103:9 111:14,15 163:21 old (1) 10:6 oliver (1) 73:15 omahoney (3) 47:6 81:19 115:24 omission (1) 131:18 once (7) 24:22 74:9 123:11 125:21 129:12 136:19 169:10 oneoff (1) 134:7 ones (2) 58:17 70:12 ongoing (4) 80:6 144:1 155:15 166:18 onsite (2) 19:16 133:23 ontheground (8) 111:6,19 112:7,17,21 114:15 122:21,24 onto (1) 150:16 onward (5) 89:15 90:20 99:7 128:18 130:18 onwardly (1) 106:2 open (3) 90:12 136:8 145:18 opening (2) 149:7,17 opened (3) 130:17 131:11 136:19 operate (4) 7:23 21:16 22:7 125:22 operated (2) 18:17 19:3 operating (6) 60:8 63:18 93:4,6 125:14 151:5 operation (6) 22:9 72:1 74:18 79:1,14 173:2 operational (3) 43:20 73:24 115:25 operations (4) 42:22 47:4 132:14 168:10 opinion (10) 20:12,16 34:10 49:25 51:3,8 53:8 54:5,20,23	opportunities (2) 27:11 142:7 opportunity (24) 3:7 7:1,2 24:1 26:2 37:2 40:17 59:25 67:5 96:25 97:3 98:11 101:12 102:12 124:9 140:6 142:14 143:2 150:16 157:24 166:12,16,18,23 opposed (4) 45:13 54:10 55:23 58:22 opposite (2) 112:17 120:24 option (1) 89:6 options (1) 157:17 opus (1) 175:18 oral (31) 1:13 2:5,23 4:19,23 6:20 69:10 79:25 80:19,24,25 81:23 83:21,25 84:19,20 86:10 99:11,13,15 102:5,19 123:23 127:15,22 128:24 134:4,11 155:7,11 175:4 orally (4) 2:7 106:25 107:2 178:6 order (32) 1:20 2:24 3:25 15:22 20:16 29:21 30:17 31:22 32:13 36:4 38:19 panel (1) 11:5 45:2,9 50:11 51:10,18 53:9 62:3 63:7 64:8,23 87:3,23 95:12 100:9 106:16 121:10 130:14 137:10,20 156:4 178:2 ordinary (1) 93:1 organisation (4) 77:6 139:7,11 152:11 organisational (3) 47:3 60:5 138:1 organisations (7) 7:15 28:7 42:12 48:14 58:19 69:16 114:4 organs (1) 148:18 origin (1) 139:9 original (2) 81:17 121:11 originated (1) 72:9 ostensibly (1) 12:19 othering (4) 140:13 141:23 164:6 165:13 others (12) 6:13 10:23 15:16 17:3 40:13 76:3 79:8 80:21 109:5 118:10 128:5 150:2 otherwise (3) 42:4 60:15 128:19 ought (17) 5:5 44:18 49:16 54:5,16 56:13 60:19 61:21 67:12 70:5 73:25 93:15 129:12 152:4 164:25 172:22 177:6 ours (1) 114:24 ourselves (1) 84:6 outbreak (2) 19:15 37:7 outcome (2) 57:1 117:18 outflow (1) 113:9 outlined (2) 55:13 89:17 outright (1) 31:13 outset (3) 55:11 147:25 175:21 outside (12) 12:19 22:7,10 26:7 27:16 121:1,8 133:3 137:24 154:17 155:9 172:24 outstanding (16) 76:8 80:20 82:8,10 84:14 98:16,20 100:3,15 106:13,20 125:1,9 126:21 145:13 149:24 outward (1) 82:10 over (22) 3:9 8:9 20:9 23:19 42:4 70:15 73:7 81:13,19 85:10,14 94:8 99:24 100:19 101:1 104:20 117:22 123:18,25 141:21 142:17 149:3 overall (5) 46:20 54:22 63:20 121:3 149:14 overarching (5) 7:24 25:10 110:18 114:17 118:19 overcrowding (2) 87:24 88:5	overlap (2) 139:1,3 overridden (2) 168:13,20 overriding (1) 167:25 overrun (1) 55:8 overseeing (2) 43:24 78:3 overseen (1) 120:18 oversight (7) 115:25 119:10 121:5,18 173:10,15,23 overt (4) 61:5 133:18 137:14 167:11 overview (1) 21:1 overwhelmed (1) 169:23 overwhelming (1) 33:7 overzealous (2) 95:11 137:9 owing (2) 99:19,20 own (3) 79:19 117:8 118:5 owned (1) 31:15 owner (1) 31:21	81:2 88:20 90:1 96:6 97:7 109:18 117:5 127:20 140:14 152:12 163:17,19 173:8 175:16 179:16 parties (1) 6:10 partnership (1) 72:2 parts (1) 39:17 party (2) 7:20 54:2 pass (1) 60:9 passage (2) 8:11 126:6 passed (2) 35:17 91:14 passes (2) 103:16 126:11 passive (1) 135:7 passivity (1) 134:21 past (6) 20:10 32:20 103:8,24 128:11 141:9 patel (5) 88:5,9,16,25 90:22 patels (3) 75:11,21 90:18 patient (1) 135:14 pattern (4) 86:11 142:6 161:25 162:2 patterns (2) 108:18 166:13 paul (1) 132:14 pause (3) 75:22 88:3,6 paused (1) 3:7 peak (1) 21:10 pending (1) 75:7 penny (1) 172:21 pensions (1) 94:8 people (133) 3:3 4:22 5:5,19,24 6:4 8:22 9:11,12 10:12 11:4,7,21,24 12:1,2,8,9,11,11,13 14:5,14 15:20 16:1,15 17:1,15,16 18:7,9,15,25 19:2 20:18,23 21:10,10,13,19,20,25 22:4,13 23:15,20 24:4,7,14 25:5,6 26:6,8 28:21,23,24 32:6 35:22 41:23 42:1,8 43:3,19,21 44:3,19,21 45:3,4 46:12,25 48:4,10,13,19 49:3,4 53:3 55:16,17 56:11 57:2,4,7 59:7 60:4,8 62:15 63:25 64:2 67:9,22,24 69:5,9,13 70:13 71:21 73:10 74:1,21 77:15 78:12 80:2,13 81:4,20 82:15 83:16 87:7 92:13,24 93:7 109:1 113:20,21 114:3 119:20 131:1 132:9 133:5,6 134:1,8 138:19 139:8,16 141:23 144:19 145:21 161:12 162:19 164:25 peoples (5) 14:13 55:24 64:4 67:4,12 per (2) 53:4 106:16 perceived (1) 58:14 perception (1) 133:10 perfecting (1) 123:18 perfectly (1) 57:5 perhaps (4) 61:8 97:6 124:1 125:5 perimeter (1) 12:20 period (26) 28:8 35:15 36:18 44:1 45:11 55:25 57:19 58:14 66:4 71:17 79:6,11 81:15 87:1 92:2,7,22 100:23 101:5 130:25 132:6 135:14 145:5 146:17 148:3 169:24 periodic (1) 82:21 periodically (1) 37:20 periods (9) 10:13 51:23 65:20 79:9 86:4 93:2,7,16 158:18 permanent (1) 19:9 permeated (1) 13:12 permissible (1) 118:6 permit (2) 51:20 165:23 permitted (1) 112:2 perniciousness (1) 55:12 persistent (2) 141:1 166:19 persistently (1) 148:18 person (13) 11:19 13:23	15:23 16:5,23 21:4 32:1 35:20 50:1 71:11 76:16 97:1,2 personal (1) 35:23 personnel (25) 11:22 12:12,14 13:6 14:2,3 16:3,22 24:5 30:22,22 32:25 42:10,15 43:21 44:3 46:11,21 56:5 59:20 63:9,15 71:9 79:10 153:7 persons (9) 13:25 14:1,7,10 24:15 33:11 36:1 76:23 85:6 perspective (14) 7:2,6 19:25 47:12 79:5,23 111:14 72:12 74:7 79:18 85:15 152:12 155:9 170:14,14 persuasion (2) 135:9,21 persuasively (1) 136:2 pertain (1) 49:3 pervade (1) 148:10 pervaded (1) 148:14 pervasive (2) 140:12,23 phase (2) 39:14 40:12 phenomenon (1) 163:13 phone (1) 177:18 phones (1) 14:16 photographs (1) 14:16 physical (10) 17:12 48:3,5,7 52:8 64:19 67:4 132:8 138:14 163:11 physically (1) 61:25 pick (1) 178:22 picked (1) 67:18 picture (8) 102:17 121:3,24 122:3,15,18,20 136:4 pictures (1) 13:24 piece (1) 20:9 piecing (1) 20:14 pierce (4) 2:14 84:3 102:5 129:1 pierre (1) 93:11 pixellated (1) 66:22 pixellation (4) 65:4 66:19 67:17 110:4 place (14) 3:19 5:9,17 7:10 29:7 77:18 86:25 101:6 105:4 120:19 142:24 150:11 173:3,4 placed (3) 72:23 79:12 88:20 places (1) 15:9 plain (2) 55:10 69:8 plainly (1) 178:11 plan (1) 99:12 planning (6) 40:5 138:17 148:13,13 150:23 165:10 plans (1) 19:14 play (5) 19:23 91:1 145:25 164:20,21 played (3) 72:14 89:5 153:11 pleaded (1) 94:10 pleading (1) 133:7 pleadings (1) 7:17 please (6) 3:14 61:12 101:24 123:22 146:6 178:22 pleased (3) 124:15 127:10 132:13 pm (6) 101:25 102:2 146:8,10 177:9 179:24 pockets (1) 46:21 pointed (7) 29:12 71:22 81:3 85:3 91:20 137:22 139:21 points (14) 85:13 86:4 88:19,24 91:12 93:19 94:4 104:16 107:23 114:17 117:15 129:6 143:24 149:18 police (4) 17:18 62:8 66:6 109:4 policies (7) 36:13 59:14 63:17 71:24 72:15,19 162:18 policy (17) 21:8 62:21 67:8 72:17 75:2 77:24 87:10 91:23 131:6 141:2 148:5,12 162:3,14,17	165:10 167:17 political (8) 23:9,12 55:14 71:16 92:12 142:17 165:10,22 pool (1) 115:6 poor (1) 120:13 population (1) 24:24 port (1) 54:13 porter (1) 88:2 pose (1) 17:16 posed (1) 13:1 poses (2) 53:14 134:12 position (31) 14:21 21:24 23:10 34:1 35:1 40:22 43:1 48:12 64:2 68:14 71:8 72:12 74:7 79:18 85:15 88:7 92:15 93:1 97:14 100:4 118:19,22 131:20 132:16 135:7 137:13 142:7 145:22 174:1 176:12 179:10 positioned (2) 78:5 101:21 positions (1) 22:16 posits (1) 94:8 possessing (1) 50:5 possession (1) 130:13 possessions (1) 14:15 possibility (1) 82:15 possible (19) 1:15,23 8:5,8 9:1 30:18 39:23 54:19 68:25 96:20 104:7,25 105:5 109:14 165:23 169:25 171:9 175:24 178:15 post (8) 72:4,24 73:11,18 91:18,22,22,25 postdated (1) 135:13 potential (6) 27:8 34:10 38:25 75:20 82:12 109:15 potentially (6) 27:12 46:24 86:5 90:1 109:3,25 power (6) 32:12,17,24 33:18,18 155:17 powerpoint (1) 66:16 powers (20) 31:25 32:9 37:21 62:25 63:4,6,6,9 125:3,4 136:12,16 145:9,14 152:2 153:22 154:3,10 155:21 156:5 ppo (1) 35:6 practical (11) 2:25 47:25 106:23 114:1,8 118:12 124:19 134:12 150:23 157:16 158:14 practicality (1) 154:2 practice (3) 78:5 139:15 141:3 practices (8) 13:17 59:14 139:18 148:9 149:13,16 164:19 166:14 pragmatic (1) 149:22 preceded (1) 88:13 precedent (1) 156:2 precisely (6) 85:16 92:9 121:9 129:8 135:24 143:13 predominantly (1) 79:17 preempt (1) 6:16 preexisting (1) 133:13 pregnant (1) 162:20 prehearing (2) 52:15 118:14 prejudice (3) 44:24 133:14 139:11 prejudiced (1) 24:15 preliminary (6) 1:4 2:3 3:18 5:9 86:9 175:20 premature (1) 82:2 preparation (3) 1:13 151:10,18 preparations (1) 39:15 prepare (1) 100:10 prepared (2) 86:16 144:1 preparing (4) 98:12 106:6 114:25 128:20 prescribed (1) 27:19 presence (3) 43:13 79:15 81:6	present (11) 35:4 54:10 58:12 66:22 81:1 90:2 94:12 97:9 110:23 132:1,22 presentation (1) 66:17 presented (1) 152:20 presenting (1) 6:24 preserved (1) 108:1 pressing (2) 67:20 69:3 pressure (3) 89:4 91:6 151:14 pressures (1) 111:12 pressurised (1) 40:25 presumption (1) 60:22 prevailed (2) 18:5 49:8 prevent (2) 69:2 99:5 prevented (1) 147:15 prevention (2) 19:14 94:17 previous (3) 57:2 142:11 148:24 previously (1) 37:13 primacy (1) 71:25 primarily (3) 132:11 151:19 153:23 primary (4) 56:15,18 132:21 149:14 prime (14) 71:13,14,19 72:12 73:6 74:13,25 86:25 87:17,21 88:8 91:4,10,16 principal (4) 3:23 6:15 41:14 86:25 principally (3) 10:8 88:4 131:24 principle (2) 34:16 153:24 prior (2) 73:18 79:5 priority (1) 141:21 prism (1) 138:24 prison (3) 32:18,19 133:1 priti (5) 75:11,21 88:5,9 90:18 private (4) 24:5 47:22 91:4,7 proactive (3) 127:21 156:11,18 proactively (1) 127:17 probability (1) 33:7 probable (1) 41:20 probably (2) 69:24 114:23 probe (1) 10:3 problem (1) 91:11 problems (1) 15:25 procedural (1) 172:14 procedure (2) 50:17 129:14 procedures (1) 63:18 proceed (2) 5:21 126:3 proceeded (1) 29:20 proceeding (1) 94:23 proceedings (5) 3:1,10 50:17,20 95:7 process (29) 3:20 7:13 9:25 17:9 28:14 29:4,14 30:25 40:14,19,21 41:1 46:18 63:23 70:6 78:8 80:6 96:16,20 98:18,24 103:16,17 105:24 107:3 123:9 126:23 157:20 161:10 processed (1) 139:16 processes (10) 20:22 64:14 77:17,22 78:3 83:9 104:2 114:10 120:18 139:10 processing (1) 72:21 procurement (1) 75:22 produce (3) 51:25 59:15 142:19 produced (3) 8:4,7 144:14 produces (1) 144:16 product (2) 20:17 137:2 production (1) 32:9 productive (1) 178:20 professional (2) 116:12 139:8 professionalism (1) 49:1 professor (3) 47:20 58:19 143:9 profiling (6) 140:17 163:10 164:3,7 171:15,21 profound (1) 127:25
--	--	---	---	--	---	---

profoundly (1) 17:22	81:5 82:5 84:13	122:17,23 125:7 133:18	112:8 128:1	regards (3) 31:15,20 52:4	reports (27) 8:7 13:20,25	responding (1) 1:7
programmes (1) 25:1	110:16,19,23 125:23 132:2	137:3 138:1,21 139:5,6	received (23) 1:12 2:5,10	regime (1) 12:5	15:20 40:10 49:12 53:15	response (13) 35:10 42:22
progress (12) 9:3 68:24	provisionally (1) 29:16	140:12,16,19,23	4:15 28:10,21,24 32:2 34:4	regressive (1) 131:5	56:19 95:21 115:23 120:13	47:5 48:22 60:2 87:14
97:23 99:3 101:5	proxy (1) 7:15	142:3,5,14 143:3,14	36:2,21 38:9 67:20,22 68:1	regrettable (4) 97:8 125:22	140:10 141:7,13 157:19,21	89:10 137:16 173:9 177:24
102:15,24,25 103:3,11,18	psychiatric (3) 157:10	145:19 152:11 164:18	76:1,9 80:14 81:24 83:5	131:17 143:1	158:5,9,12 159:2,15	178:1,3,5
127:11	158:3,6	166:15	86:21 114:22 129:22	regular (2) 13:16 79:14	162:13 176:9,13,18,23,24	responses (2) 34:18 120:22
progressed (2) 107:7 150:20	psychiatrist (1) 96:2	racist (10) 44:25 45:17 56:7	receiving (3) 39:1 79:18	regulations (1) 24:22	represent (10) 4:22 32:6	responsibility (5) 87:5,7
progressing (1) 85:23	psychiatry (1) 95:16	58:5,14 59:21 122:5	115:23	regulators (1) 35:2	76:19 83:20 98:24 127:18	89:25 91:23 170:6
project (1) 43:23	psychological (3) 84:11	137:14 139:14 141:6	recent (1) 5:23	rehearse (2) 125:10 151:23	129:23 146:15 151:4	responsible (5) 27:20 81:18
proliferation (2) 12:24 121:6	93:23 158:6	radar (1) 59:13	recently (2) 100:2 141:16	reinforce (1) 5:23	156:11	88:4 90:10 169:21
prolonged (2) 79:8 86:4	psychologist (1) 96:3	radical (1) 143:8	reception (1) 87:13	reiterate (1) 17:2	representation (2) 76:16	rest (2) 99:22 156:10
promote (2) 15:13 159:23	psychologists (1) 160:21	raf (1) 89:2	recognise (7) 69:15 72:16	relate (2) 176:9,13	154:22	restate (1) 52:4
promoting (1) 156:15	psychology (1) 95:17	raise (8) 17:8 26:4 59:23	95:3 104:12,14 124:10	related (8) 9:8 33:15 34:5	representations (2) 67:5,14	restful (1) 179:19
prompt (1) 128:1	public (26) 3:5 8:10 12:24	83:2,12 134:23 168:23,24	139:1	35:13 36:17 45:3 82:8 93:5	representatives (2) 56:17	restrained (1) 62:1
prompted (1) 42:18	16:19 19:8 20:3 22:18	raised (20) 5:3 13:5 18:20	recognised (7) 69:12 121:19	relates (2) 35:16 75:9	65:18	restraint (3) 62:9 121:7,16
promptly (2) 128:4 136:15	23:11,13 24:5 47:2 48:15	26:22 37:10 65:2 78:11	143:11 158:17 163:14,18	relating (7) 16:11 33:1 79:7	represented (5) 2:13,15,18	restraints (1) 64:19
prone (1) 5:12	56:5 66:24 67:9 94:14	82:13,23 107:23 111:18	164:16	100:4 160:12 162:24	42:8 83:17	restricted (1) 50:18
proper (1) 25:2	122:12 139:21 144:9	118:10 143:17,19 168:6,10	recognises (1) 76:11	174:13	representing (7) 73:9 76:23	restrictive (1) 13:8
properly (5) 89:23 91:20	148:25 154:21	169:3 170:21 173:8,25	recognition (1) 143:13	relation (32) 4:12,13 10:17	77:15 78:11 81:25 82:14	result (6) 12:23 32:18 58:10
116:14 165:24 170:25	156:14,19,20,22 166:19	raises (5) 17:24 62:17 63:12	recollection (1) 8:9	11:2,10 12:22 13:2 25:23	85:4	83:7 111:21 156:20
property (1) 14:13	publish (1) 106:19	133:10 139:24	recommendation (1) 137:8	29:6 30:21 33:22 34:1	request (17) 29:5 35:9 36:10	resulted (4) 9:22 28:11
proportionality (1) 109:18	published (2) 47:20 135:11	raising (2) 139:22 156:11	recommendations (8) 8:11	36:14 38:8,14 47:4 49:17	68:14,17,19,23 76:14 83:5	55:16 174:20
proportionate (1) 114:14	punched (2) 62:2 120:4	range (9) 6:22 8:22 10:3	13:13 94:16 103:21	54:21 55:14 75:12,21,24	87:14 101:14 109:11 110:8	retain (2) 46:16 110:6
proposal (9) 40:14 72:9	punishment (3) 120:2	46:8 51:20 70:11 87:3	142:9,24 143:6 144:9	77:17 89:6 92:24 94:18	129:5 167:2 172:23 178:3	retired (1) 135:24
84:10 89:10 92:16,22	121:2,7	98:13 112:7	reconciled (1) 15:15	108:11 118:2 121:13,14	requested (7) 2:6 34:3,5,21	retrospective (1) 131:8
95:19 129:1 157:1	punitive (7) 23:24	ranging (2) 48:14 52:13	reconsider (1) 74:9	123:10 176:12	65:15 76:1 105:8	return (6) 6:6 13:17 56:14
proposals (1) 80:2	119:11,15,19 121:4	ranks (1) 45:5	reconvene (1) 146:5	relatively (1) 102:14	requests (18) 1:8 8:24 23:4	66:21 110:11 145:6
propose (2) 70:6 153:23	131:6,12	rate (1) 30:16	record (5) 13:5 17:18 32:4	released (1) 146:21	31:4 39:12,16,18 66:10	returned (1) 26:19
proposed (16) 9:2 71:12	purpose (6) 1:19 3:23 18:22	rather (21) 7:5 22:5 52:18	105:16 118:19	relevance (5) 74:23 102:20	71:4,7 73:2,16 75:9 78:14	returns (1) 168:9
73:10 74:19 82:21 86:18	84:17 94:7 100:20	53:25 62:5 64:16 78:1	recorded (4) 3:1 14:9	109:15 143:16 161:16	80:22 83:8 123:10 145:18	revealed (1) 67:12
93:11 95:15 96:16	purposes (2) 35:7 97:10	79:19 92:10 109:21	16:24,25	relevant (34) 9:6 44:1 45:10	require (19) 8:2 25:8 27:25	revealing (2) 67:4 171:3
100:13,20 119:1 157:14	pursue (1) 167:7	110:9,21 114:18 120:23	recording (1) 120:11	50:22 57:5,19 58:14 65:20	33:22 35:22 40:6 51:8	reveals (2) 122:18 140:11
159:11 167:22 171:5	purview (1) 161:7	125:20 127:17 132:22	records (14) 10:13,17 20:22	66:4 67:1 72:19 79:6 83:12	107:6 112:12,25	revolatory (2) 16:11 41:23
proposition (2) 152:6 158:17	pushed (2) 30:14 62:1	134:7,25 176:13 179:21	34:5 35:19 36:1,9,11 38:9	87:1 89:5 92:21 98:7	113:2,7,24 119:14,17	reverend (1) 143:10
propositions (2) 69:17	puts (1) 92:12	reach (5) 58:11,25 85:19	43:17 89:9 130:13 135:14	109:3,25 112:4 115:22	124:22 136:18 159:9	review (25) 28:10,14 29:9,21
157:22	putting (1) 179:17	112:19 113:23	172:5	116:5 122:13 128:9 130:25	164:16	30:12 44:11,14 72:12 73:8
prosecution (1) 84:16		reached (2) 5:14 124:12	recruiting (1) 12:9	132:6 134:17 135:14	required (21) 11:21 13:18	74:8 75:7 76:8 78:12
protect (2) 24:16 162:19	Q	reaching (1) 144:4	recur (1) 141:21	147:12,17,23 165:2 174:8	32:12 42:10 50:6,10,19,25	80:5,20 82:25 83:9,11
protected (1) 165:1	qualifications (1) 157:10	reaction (1) 92:3	recurrent (1) 88:10	177:18	51:3,9 54:9 58:8 90:2	104:2 126:23 135:5 136:13
protection (5) 76:4 81:14	qualified (3) 159:17 160:2	reactively (1) 127:17	red (5) 13:7,13 77:2,8	reliable (2) 8:9 41:24	95:24 96:12 103:15 112:21	142:1 145:15 160:25
131:2 165:12 166:6	164:13	read (12) 2:10 11:9,14 19:24	redacted (6) 43:12 78:19	reliably (1) 162:4	114:10 150:5 152:3 154:4	reviewed (3) 65:21 66:7
protections (1) 172:14	quality (3) 13:16 91:14	90:10 95:13 105:1,5	79:13,22 132:17 136:7	reliance (1) 13:3	requirement (2) 44:9 130:23	109:13
protests (1) 120:21	120:13	116:12 138:24 139:12	redaction (8) 29:15 30:2	relieved (1) 89:3	requirements (4) 32:8,13	reviewing (4) 39:16 41:5
protocol (1) 152:23	quashed (1) 140:2	153:8	97:15 104:1 107:11,15	reliving (1) 145:5	38:7 90:5	66:5 128:20
protracted (1) 157:20	queries (1) 82:25	readiness (6) 84:24 97:19	145:13 177:21	reluctance (1) 130:19	requires (7) 23:16 40:19,21	reviews (2) 140:24 144:14
prove (1) 99:22	question (45) 23:15,19 36:3	102:22 123:2 126:2 144:2	redactions (4) 30:21 86:2	reluctant (3) 33:2,8 130:17	105:19 117:19 137:15,19	revised (1) 130:2
provide (50) 2:1 3:24	41:10 50:22 51:12,17	ready (1) 61:16	126:22 128:14	rely (3) 117:15 125:9 151:22	requiring (2) 2:4 156:4	ridley (3) 91:5 92:6 173:21
4:18,25 6:14 18:15	52:25 53:1,14 59:12 62:15	real (14) 32:25 33:4 41:9,21	reduce (4) 5:24 12:6 60:4	remain (5) 21:18 82:17	research (2) 47:19 163:16	ridleys (4) 56:1 87:15
20:12,25 21:4 25:15 27:13	63:20 79:24 80:23 81:22	46:19 47:25 131:15 142:22	115:13	107:2 126:15 136:24	resettlement (1) 170:10	169:8,18
29:9,20 31:6,13 32:7 33:24	87:19 89:14 90:20 91:13	144:17 155:4,5,13,16	reduced (1) 73:21	remainder (2) 99:18 130:9	resignation (2) 71:15 88:12	rightly (9) 23:11 39:21 85:3
34:17,23,25 37:5 38:23	92:11 93:4,5 94:5,6,19,25	173:25	reducing (1) 157:21	remained (1) 12:3	resistant (1) 132:19	86:1 88:24 95:2 96:7
40:13,14 42:3 43:9 48:21	95:14 97:19 120:25 124:19	realised (1) 114:25	redundant (1) 8:11	remaining (1) 71:11	resolution (2) 51:8 95:7	138:11,25
54:20,22 60:10 64:8 97:24	125:20 126:24 133:21	realistic (1) 98:11	refer (1) 35:1	remains (4) 7:12 29:22 80:5	resolve (9) 39:20 50:19 51:4	rights (14) 7:19 32:15 51:1
84:9 99:7 104:8 113:1,5	134:23 136:12,24	realistically (3) 40:6 126:17	reference (46) 1:24 5:23	104:22	88:14 94:9,11 95:5 176:10	95:10 117:7 125:17 146:24
114:7 117:18 127:7,8	139:13,25 140:3 141:19	134:7	6:23 7:24 8:2,2,18	remarks (2) 1:3 180:2	178:12	138:11,25
130:2,3 133:24 139:7	145:14 157:1 168:25 175:2	reality (6) 10:4 111:13	11:15,19 25:8 32:7 36:19	remedied (2) 149:4,16	resolved (1) 51:10	165:5,9 173:17,17
147:11 158:14 166:16	questionable (1) 121:4	133:10 141:2 154:7 160:9	37:23 38:6 49:25 50:13	remedy (1) 163:3	resolving (2) 51:16,20	rigorous (1) 117:13
170:15 172:2	questioned (3) 48:10 118:5	really (10) 11:1 22:23 47:11	51:19 56:14,22,24 58:6	reminder (1) 17:11	resonance (1) 41:21	rigorously (1) 87:3
provided (66) 4:20 18:10,11	175:5	59:17 67:23 101:18 115:6	59:4 78:22 90:22 94:20	remote (1) 47:10	resorting (1) 11:17	rigour (1) 41:10
19:1,4 20:16,17 21:1,3	questioning (1) 7:11	145:4 157:5 174:22	104:25 108:22 109:6	removal (2) 93:10 140:15	resources (6) 127:9,13 136:8	rise (3) 53:7 60:1 155:4
25:17 28:22,23 29:18	questions (29) 12:13 17:8,25	reason (14) 3:11 5:20 33:23	112:10,12,16,24,25	rendered (1) 98:24	150:25 151:7,11	rishi (2) 71:18 72:4
31:5,15 32:1 34:21 35:7	21:23 22:12 24:12 26:2	43:11 68:11 85:18 101:18	113:2,7,24 119:14,16	repeat (7) 24:7 25:5 56:16	resourcing (1) 79:8	risk (22) 17:16 21:20 24:14
38:11,15 40:18 43:3,8,10	27:8 34:19 43:1 46:23 47:3	138:22,23 140:5 151:20	120:5 122:13 124:21	103:5 128:11 134:18	respect (29) 2:2 35:21 43:7	25:4 32:25 33:4 49:2 52:13
54:6,8 61:22 63:3	48:24 49:7 54:14 57:6 60:1	153:11 155:23 172:22	138:3,13 143:22 159:10,25	152:13	46:5 47:2 65:16 78:17 83:6	62:18 64:12,14 116:15
66:6,9,11 67:24 79:3 82:9	62:20,20 64:17 66:1 81:16	reasonable (5) 63:5 109:24	references (3) 20:1 63:8	repeated (7) 90:17 136:9	100:22,24 112:22 117:6	120:23 126:20 142:22
95:20 104:2,7,9,10 107:16	97:12 100:17 115:25 118:9	124:22 145:8 150:5	120:21	141:22 142:9 149:16	119:4 129:23 130:9 134:12	153:17 154:6 155:5,13,17
108:6 109:16	133:11 156:8,12	reasonableness (2) 94:21	referred (14) 26:13,14 43:16	162:23 166:12	147:19 153:4 154:23	158:24 173:19
123:6,8,11,13 126:23	quick (1) 122:1	109:17	54:10 58:20 107:21	repeatedly (3) 134:4 148:18	161:23 162:15 164:20	risks (15) 13:1 17:17 21:18
130:5,7,11 134:15 147:3,6	quickly (8) 1:22 8:4,8 68:16	reasonably (18) 8:1 39:8	120:3,9,16 128:24 143:21	168:12	167:20 170:23 172:17	25:5 52:13,14 53:6 57:8,10
149:23 150:1 152:25 153:5	104:24 129:13 176:10,11	41:10 50:15,19,22 51:9,18	169:7,18 173:20	repeating (1) 66:17	174:8 176:1,8 177:25	60:4 125:16,18 128:11
158:2 159:16,18 163:7	quite (6) 25:19 51:6 55:19	53:9,23 94:21 105:5	referring (2) 20:23 85:7	repetition (1) 94:14	respectful (7) 46:22 130:16	169:14,14
166:23 171:2 173:20	64:22 114:23 129:4	137:6,7,12 143:23 144:7	reflect (2) 22:11,17	replied (1) 16:8	134:24 137:11,25 140:2	robert (2) 143:8 167:16
175:14 177:19	quote (1) 90:7	166:7	reflected (2) 129:21 161:1	report (44) 1:22 8:4 9:17	165:25	role (30) 6:9 9:20 12:19
provider (2) 135:12 136:14	R	reasons (29) 7:16 21:12 24:1	reflecting (1) 147:7	16:24 25:12,23,25 26:4,11	respectfully (19) 53:24 54:4	13:14,19 42:24 60:25
providers (3) 30:12 83:13	race (6) 142:2,21 144:24	32:17 35:25 45:12 65:24	reflects (3) 28:7 117:3	27:4,5,10 35:7 36:22,23	86:6 94:4 95:19 96:23	71:15 72:13,20 73:6 75:17
156:9	160:5 164:3 165:19	76:24 89:22 90:25 101:17	170:17	49:16 51:25 53:25 54:1,22	100:13 118:4 138:2 149:8	77:6 81:11,15 89:5 91:2
provides (3) 3:7 127:23	racial (8) 140:16	108:9 111:5,19 112:8	refeshments (1) 179:20	57:16 68:24 96:2 100:25	154:23 158:16 164:20	142:5 153:11,13 154:18,20
154:14	racialb (1) 171:21	114:13,14 116:20 121:22	refugee (1) 77:5	140:18 141:10 142:25	161:6 165:18 168:13 170:1	155:1 161:18 164:18
providing (10) 18:13 68:5	171:15	128:17 142:4,9 144:23	refugees (1) 131:7	143:25 144:16 155:3	172:15,18	166:11 167:9 169:8,11
82:21 104:18 105:8 108:19	racialbased (1) 171:21	150:1				

Opus 2
Official Court Reporters

transcripts@opus2.com
020 4518 8448

talking (1) 95:25 targeted (1) 83:8 task (14) 56:16,18 73:24 79:1,11 81:12 98:12 124:10 147:13 149:6,6 151:12,24 172:16 tasked (4) 43:24 115:9,10 138:16 tasks (2) 99:2 151:20 team (59) 1:8 4:16 6:9,16,17,20 7:4 13:15 19:16 36:16 37:4,20 39:7,22 40:22 41:4 42:13,22 45:6 47:5,18 51:5 54:17 59:6 64:7 68:10,24 69:24 78:23 82:24 83:3 92:20 98:12 99:1 100:2,12 102:12 104:14 106:15 108:4 110:11,14 114:11,20,24 115:3,16 117:10 118:16 119:7 123:5 135:5 145:25 155:10 156:13 175:11,17,19 176:17 teams (10) 40:4 85:12 86:16,24 93:21 97:2 105:17 107:6 111:4 176:25 techniques (2) 62:10 121:16 teenagers (2) 14:24 96:5 telescope (2) 113:14,15 telling (2) 135:20 160:19 tellingly (1) 140:19 temporal (1) 28:2 temporality (1) 130:25 temporarily (1) 92:9 temporary (1) 99:22 ten (2) 61:12,19 tend (1) 54:25 tension (1) 8:24 tensions (1) 5:15 tent (3) 11:10 133:3 134:14 tents (2) 15:21 138:9 tenure (1) 47:9 terms (53) 1:24 5:23 6:23 7:23 8:1,2,17 25:8 32:7 36:19 37:22 38:6 48:18 49:20,24 50:13,16 51:19 54:3 56:14,22,24 58:6,16,17 59:4 78:22 94:20 104:25 108:21 109:15 112:10,12,16,24,25 113:2,7,23 119:14,16 122:13 124:21 136:3 138:3,13 143:21 147:18,24 149:18 152:21 158:17 159:10 test (7) 50:1,24 84:9 93:25 94:9,19 136:7 testing (1) 26:7 thanet (1) 174:2 thank (25) 1:5 3:15,16 55:9 61:10,12,16 70:23 83:18,19 100:18 101:24 102:4 123:17,17,21 124:3 146:4,7,12 175:7,9,11 179:11,11 thanking (3) 85:1 102:11 178:17 thanks (2) 71:2 175:18 thats (41) 8:16 22:8,15 29:7 30:15 35:3 56:20 68:12 70:14 83:23 87:15 90:23 96:2 101:18 105:1 110:3,25 111:13 112:1 118:15 143:12 147:23 151:15 156:1 157:2,11,15 159:2 161:15 162:19 163:4 165:6 166:22 168:25 170:7,17 171:10,11 174:1 175:14 176:23 theme (2) 75:18 170:17 themes (2) 9:5 122:2 themselves (8) 13:4 15:23 45:22 46:2 67:3 75:6 134:16 145:21 theoretical (1) 135:9	theory (1) 140:5 thereafter (2) 106:16 176:22 therefore (12) 4:25 72:22 79:20 99:14 100:12 112:20 126:11 131:5,19 134:18 136:10 165:2 theres (20) 63:20 69:3,24 70:17,19 88:10 97:15 101:17 123:19 124:14,17 129:5 142:21 157:8 158:8 160:4 162:16 164:14 167:13 179:21 theyre (6) 16:10 64:18 70:7 122:25 136:19 169:14 theyve (1) 66:21 thin (1) 23:6 thing (2) 24:4 144:21 third (11) 71:5 74:11 99:2 102:16 113:25 157:8 118:4 125:1 131:14 144:12 145:13 thirdly (1) 95:4 thomas (1) 33:4 thorough (3) 90:9 124:20 137:7 though (5) 52:11 85:1 106:20 110:24 155:25 thought (5) 65:3 101:4 104:17 117:10 150:13 thoughtlessness (2) 139:12 142:2 thousands (1) 138:19 thread (3) 140:11 141:10 143:7 threads (1) 119:12 threat (1) 126:7 threatening (2) 122:8 133:7 three (16) 66:11 71:3 79:6 85:14 94:4 96:18 99:20 111:18 115:12 121:25 124:7 129:6 130:1 143:24 146:21 151:24 three day (1) 30:13 threeminute (1) 3:6 threstaged (1) 94:2 threshold (1) 155:19 throat (1) 26:18 through (13) 28:13 30:14 55:22 71:25 84:23 91:6 113:14 131:24 132:11 138:24 139:11 141:9 161:11 throughout (1) 146:19 throughput (1) 79:8 throws (1) 21:7 thus (3) 21:7 33:10 95:8 tierney (3) 81:13 116:18,18 tightly (1) 143:25 time (66) 2:7 8:10,12 10:13 11:25 12:10 13:6 17:19,21 18:8 19:6 22:12,21 28:8 31:7,11 38:2 41:3,24 42:12 44:9 47:13,14 51:24,24 54:24 55:3 60:16 65:11 72:25 83:14 91:12 92:4 95:12 100:23 103:13,15,16 104:17 110:17 115:1 117:14 120:10 123:3,18 124:1 126:6 127:7,9,13 128:19 130:25 136:9 137:10 145:22 150:25 151:2,10,11,13,14,17,19 153:22 169:9 175:2 timeconsuming (3) 36:4 39:17 143:21 timeframe (1) 97:13 times (4) 7:12 14:25 65:13 86:22 timetable (14) 1:17,21 2:24 4:1 30:13 43:4 51:22 70:10 106:19,21 126:20 150:19 154:5 158:1 timetables (1) 151:15 timing (4) 38:17 84:24 88:18 97:20 tiny (1) 14:24	today (29) 1:6,20 2:8 3:9 29:22 86:10 97:21 101:6,7 102:21 107:2 122:14 124:9,18 147:18 151:8 175:10,13,15,20 176:1,7,11,15 177:11 178:6,9,14 179:18 today's (4) 3:1,23 110:18 135:23 together (6) 20:14 85:7 95:16 109:12 119:12 142:16 toilet (1) 11:4 toilets (2) 14:7 15:22 toing (2) 97:5,15 token (1) 60:6 told (4) 14:5 16:6 91:15 102:8 tolerated (5) 18:2 21:22 60:7,8,9 toleration (1) 55:17 toll (1) 8:13 tone (1) 133:14 too (20) 4:19 7:3 16:12 30:3 36:25 42:9 44:17 46:5,16 47:10 58:22 69:17 93:20 97:17 154:4 159:20 160:24 161:4 169:12 170:11 took (7) 3:19 15:2 34:7 35:12 77:18 81:13,19 142:2 tools (2) 135:2 144:5 toothpaste (1) 11:17 topdown (1) 140:1 topic (5) 55:1 78:14 82:8,12 118:18 topics (9) 40:15,17,22 71:3 84:6 103:3 124:24 151:24 175:5 torture (2) 138:7 162:20 111:18 115:12 121:25 118:20 129:18 touched (3) 65:3 105:10 116:24 touchstone (2) 49:23 137:6 towards (14) 1:18 13:11 14:9 23:24 24:11 40:8 45:20 46:12 56:8,9 68:12 81:14 132:3 142:2 towel (2) 11:12,13 towels (2) 11:12 23:6 toxic (3) 141:4 142:19 148:9 toy (1) 15:21 toys (1) 11:8 traces (1) 140:8 trafficking (1) 162:20 tragic (2) 128:2 153:14 train (1) 22:22 trained (2) 12:11,14 training (4) 46:13 62:21 121:16 133:14 tranches (1) 107:2 transfer (2) 21:13 55:16 transferred (1) 23:18 transparency (2) 13:16 156:17 trauma (1) 117:25 traumas (2) 15:5 52:21 traumatic (1) 145:5 traumatised (1) 52:24 travelled (1) 14:14 traversed (1) 153:3 treasury (7) 74:12 87:20 89:18,21 90:13,14,16 treat (1) 140:24 treated (20) 20:20 24:4 26:12 59:8 109:2 134:1 138:8 139:16 146:19 147:2 160:8,17,18 162:7,25 163:19,21 164:2 166:6 175:1 treatment (34) 13:9 20:24 25:2 26:6,8 33:24 34:7 36:2 39:1 45:11 48:3 56:5 57:7 58:1 59:15 108:20 109:19 112:14 113:3,8 119:18,20 127:19 128:4	129:20 132:8 139:1,2 159:11 161:2 164:1 165:3 174:9,25 triage (1) 35:12 trial (5) 7:15,20,21 45:13 111:25 tried (1) 115:5 troubling (1) 86:6 true (6) 17:22 24:25 41:25 112:1,1 114:5 truly (2) 41:23 134:11 trust (2) 4:6 114:11 truth (2) 94:12 160:19 trying (1) 170:15 tuesday (5) 176:16 177:8,14,16 178:10 turn (20) 3:14 24:17 39:3 55:9 67:19 86:3,13,19 90:11 92:16 93:19 95:14 97:19 105:15 106:7 107:20 110:15 115:2 121:23 123:22 turned (1) 108:10 turning (13) 2:25 20:7 21:6 49:10 52:1 71:6 79:24 82:8 88:21 90:23 103:3 116:22 160:11 type (1) 42:5 typified (1) 162:24	U uk (8) 14:11 15:13 24:23 25:6 93:14 131:1,4,10 ukhsa (2) 78:6,7 ultimate (1) 89:25 ultimately (3) 21:15 72:10 151:10 un (1) 173:17 unable (6) 32:7 47:11 76:21 99:19,20 128:6 unacceptable (2) 13:9 128:16 unaccompanied (9) 13:10 96:4 146:18 147:2 152:10 157:12 162:25 174:10,25 unanimous (1) 96:8 unanswered (1) 134:21 unauthorised (1) 121:7 unaware (1) 25:16 uncertainty (3) 8:14 130:20,21 unchecked (1) 122:18 unclear (2) 39:20 43:6 uncontentious (3) 95:23 158:16 159:21 uncontroversial (5) 53:13,20 74:3 80:9 91:13 uncover (3) 131:23 137:20 166:12 uncovered (3) 142:6 162:23 164:11 uncovering (1) 138:17 underestimated (1) 42:6 undergo (1) 83:8 underline (1) 105:3 underlying (7) 12:25 20:15 39:19 62:21 63:8 74:5 142:10 undermined (1) 131:18 undermines (1) 130:21 underperined (2) 163:22 166:14 underpinnings (1) 164:24 underpins (1) 103:1 underresourced (1) 169:24 underscore (1) 150:22 understand (24) 3:11 20:14 31:23 40:24 43:5 45:2 51:23 60:5 67:2 74:13 88:18 90:24 92:22 106:11 107:25 108:3 109:16 113:15 116:14 117:21 147:10 150:3 165:21 173:22 understandable (1) 130:16 understandably (1) 107:24	understanding (16) 6:1 26:16 27:20 60:2 84:17 128:12 147:14 148:8 153:7 154:18 167:1 168:19 170:4,20 174:13,23 understands (4) 65:10 71:16 72:6 74:2 understood (12) 12:8 38:9 52:9 59:10 64:12 68:3 76:14 108:8 109:4,7 114:2 117:19 undertake (2) 18:24 147:13 undertaken (9) 8:3 20:9 149:7 150:24 151:21 161:10,24 175:3,13 undertaking (34) 67:19 68:3,15,18,23 69:1 84:7 85:15,16,19,21 99:3,5,8,9 100:1 104:3,6,12,18 105:8,10 123:11 125:1 126:21 129:3,7,9 130:15 131:14 134:22 145:16 178:1,3 undertakings (3) 149:20 150:4,6 underway (2) 44:15 136:20 undetained (1) 88:23 undisclosed (1) 82:17 undoubtedly (1) 126:25 undue (1) 8:3 unexamined (1) 126:15 unexpected (1) 3:8 unfolded (1) 148:2 unfolding (1) 88:14 unfounded (1) 133:4 ungoverned (1) 122:18 unheated (1) 173:19 unhelpful (1) 114:23 unit (2) 77:21,23 united (2) 163:17,18 university (1) 4:6 unjustified (1) 120:1 unlawfully (7) 21:21 22:4 55:18 138:19 146:19 153:18 165:15 unless (5) 70:17 100:17 101:14 123:15 146:2 unlike (1) 142:11 unlikely (3) 64:5 77:11 78:21 unnecessary (2) 96:22 151:13 unpicking (1) 61:7 unpleasant (1) 13:11 unredacted (1) 134:16 unregulated (2) 121:8 173:3 unsafe (2) 173:3,4 unseen (1) 125:14 unsurprisingly (1) 18:5 until (17) 18:7 27:2 29:13 30:1,9 62:13 68:15 70:5 71:14,18 89:14 100:14 104:8 123:25 135:11 177:3,9 untreated (1) 11:18 unused (1) 10:9 unvaccinated (2) 25:2,5 unwilling (1) 100:6 unwitting (1) 137:20 update (18) 2:1 3:24 4:12,25 68:21 82:9 102:19 104:5 106:11 107:22 108:6,7,8 119:6,7,23 122:1 135:12 updated (2) 2:23 24:21 upheaval (1) 88:12 upon (21) 18:25 34:11 36:1 39:19 41:19 47:16 48:5 60:11 64:8 84:12 85:25 87:24 88:19 92:2 96:4 148:19 151:22 160:2,25 169:4 174:17 upshot (1) 106:1 upwards (1) 40:3 urge (2) 39:22 134:18 urgency (5) 68:12,18 107:8 125:13 126:14 urgent (1) 87:14	urgently (2) 87:23 88:14 used (19) 11:12,13 14:6,9 45:16 56:8 57:21 61:23 62:7,10 63:11,21,24 64:11,15 65:24 120:19 139:14 163:12 uses (3) 62:5,5 64:19 ushers (1) 175:18 using (4) 11:20 57:8 59:20 89:2 usual (1) 83:9 usually (1) 9:1 utility (1) 69:25 utmost (3) 35:24 104:14 122:12 utter (1) 165:5 utterly (1) 169:11	V v (5) 32:23 33:14 41:18 90:4 94:3 vaccinated (1) 25:7 valuable (1) 60:11 value (4) 19:21 78:24 124:11 143:11 van (1) 27:23 vans (1) 120:9 various (1) 75:10 vast (1) 25:6 vastly (1) 91:7 ventilated (1) 178:6 ventilation (1) 18:19 venue (1) 2:23 verbally (1) 134:4 versions (1) 67:23 vetting (1) 13:3 victim (1) 130:22 victims (3) 138:7 162:20,20 video (6) 66:6,11,14,14,16 177:18 videos (1) 67:2 viewed (1) 90:18 views (3) 58:14 81:24 141:6 violations (1) 125:16 violence (5) 48:7 62:5 63:25 117:25 138:8 visible (2) 11:18 135:10 visit (1) 22:22 visited (2) 22:19 133:1 visits (2) 76:17 118:14 visual (1) 101:17 vital (7) 8:6 87:12 93:8 99:2 128:12 153:11 156:22 vitality (1) 90:19 voiced (1) 24:8 voices (3) 139:23 140:2 168:23 volume (1) 28:5 vulnerabilities (5) 24:10 69:20 98:23 117:8 129:19 vulnerable (6) 17:15 117:7 159:1 162:19 163:3 172:10	W wait (1) 110:14 waiting (7) 9:15 10:5 44:11 104:2 107:5 123:19 179:21 wake (1) 62:3 walked (1) 32:20 wallis (1) 152:24 ward (1) 143:10 warned (2) 125:15,16 warrant (1) 56:24 warren (1) 95:8 warrens (2) 94:2,7 wash (4) 11:14 15:22 16:1,2 wasnt (4) 26:13,18 47:14 68:15 waste (1) 127:9 wasted (1) 136:8 wasteful (1) 38:4 wastes (1) 31:11 water (4) 10:20 15:22 18:18 138:10	way (26) 5:22 6:21 10:16 21:3 33:12 52:15 61:24 62:3 65:8 70:21 82:18 94:11 101:18 105:6 110:9 116:6 117:11 118:11 139:16,19 147:15 152:21 157:16,23 158:15 177:15 ways (4) 115:8,12 143:14 164:6 weather (1) 138:9 wed (1) 107:23 wednesday (1) 177:3 week (6) 30:9 126:4,4 177:15,17,24 weekend (1) 179:19 weeks (2) 40:4 41:3 weighted (1) 132:3 welcome (2) 92:23 150:16 welfare (8) 15:13 19:19 141:22 142:18 158:3 159:23 165:9,9 wellington (1) 11:2 wellknown (1) 41:17 wellresourced (1) 114:11 went (4) 9:24 57:25 167:1,1 werent (2) 44:10 179:4 western (12) 13:15 19:1 77:6,18,23 148:2 153:12,19 154:19 158:21 161:11,23 wet (1) 11:13 weve (25) 31:21 110:16 111:20 114:21,23 115:5 116:5 118:12 119:5,22 120:4,19 126:15 151:17 153:19 154:11 159:11,15,19 168:4 170:8 171:9,15,23 172:23 whats (2) 109:16 122:14 whereas (1) 74:17 whereby (3) 37:24 69:19 162:2 whilst (4) 33:21 34:22 38:3 171:24 whole (3) 4:15 53:19 95:7 whom (17) 5:4 29:2 39:5 43:6,16 58:19 71:11 78:17 80:25 81:18 83:15 84:8 86:14 89:25 132:1 146:17 171:12 whose (16) 9:16 11:24 30:6 70:2 72:20 79:17 80:8,13,16 81:9,15 115:7 117:24
---	---	--	---	---	--	---	---	---	---

41:11,12 42:22 43:9,19 44:5 47:17 70:7 71:3,4,7,8,12 73:2,15 74:7 75:4,8,20 77:20 78:7,14,18,20 80:4,10,16 81:5 82:5 84:13 97:22 110:15,16,19,24 114:19 115:20,20 116:2,19,19 117:18 123:6 125:2 126:1 130:5 131:19 132:2,3,17 134:10 136:3 140:4,8 147:3,6 149:22,23 150:1 152:16,25 167:7 168:14 169:8,18 witnessed (1) 46:2 witnesses (103) 4:2 5:4 6:21,25 7:11,19 8:14,23 9:9 19:5 24:1 29:1 31:1,11 32:12,18,22 33:5,19 34:15 35:5 37:14,16 38:4,10,11 39:5 42:9,11,16 43:15,22 45:24 46:1,5,7 47:17 48:21,23 50:4 57:6 59:24 61:22 62:19 68:2 69:5,15,19 70:1 73:25 74:10 76:7 78:17 79:16,24 80:8,23 81:8,23 82:3 84:8 86:5 88:1 93:20 99:13 102:16 110:21 111:6,17,20 112:7,17,21 114:15 115:7,10 118:5 122:21 124:25 127:7,15 128:10 131:25 132:1,4,20 133:12 134:12,21 136:9,24 147:18 152:15 156:3 167:5,20,22,23 168:3 169:2 170:24 172:6,17 women (9) 9:12 49:14 54:3,6,15,21 119:5 138:6 162:20 wont (2) 103:5 151:25 wood (1) 140:15 wording (1) 129:10 wore (1) 65:12 work (39) 2:2 4:8 5:1 9:6 13:14 20:9 29:7 37:22 39:15,18 40:7,12,20 47:20 57:3 67:25 78:4 85:2,3 100:9 104:23 105:17 106:4,6 107:14 111:10 122:2 124:12,17 126:7,18 130:14 134:8 145:7 150:23 153:2,2 160:3 178:18 worked (13) 12:17 22:19 42:2 43:25 44:9,21 46:25 47:2 48:8,14 49:2 76:2 132:4 worker (1) 159:17 workers (5) 13:19 48:1 78:1 98:18 114:2 workforce (1) 45:5 working (16) 13:4 18:21 22:24 23:9 24:14 46:13,21 47:8 81:6 93:13 98:7 130:1,8 134:14 141:19 147:1 works (1) 174:2 worrying (1) 11:1 worse (1) 139:24 worst (1) 22:24 wouldnt (5) 14:6 31:2 33:5 34:17 38:13 wound (1) 11:20 wounds (1) 11:18 wrapper (1) 11:20 write (2) 23:2 177:22 writing (7) 16:25 40:1 64:5 107:2 119:13 122:4 131:21 written (28) 2:9 4:18 6:19 76:25 78:16,16 86:8,17 100:1 102:18 106:18,23 107:23 110:5,17 116:22,25 117:2,2,16 125:9 127:12 134:11 135:17 148:15 151:23 174:15 178:7 wrong (3) 144:13 167:1,2	wrongly (8) 146:18 147:2 160:17 162:7,25 164:3 165:3 175:1 wrote (5) 10:25 16:23 19:8 36:22 177:25 Y yaris (1) 140:15 year (8) 1:16 3:20 4:7 5:14 73:23 104:11 123:8 175:24 yearly (1) 5:14 years (9) 8:14 22:24 41:25 42:4 85:10 124:14 140:16 141:18 149:3 yesterday (1) 98:8 yet (11) 43:8 53:11 70:1,2 80:13 85:20 90:25 96:25 98:21 106:2 131:25 youll (4) 72:11 77:3 112:4 162:10 young (8) 10:24 12:22 13:23,23 99:19 122:10 130:1 161:11 younger (1) 25:4 youre (4) 55:1 83:20 100:23 169:1 yourself (1) 137:14 youve (12) 4:19 70:21 114:22 147:17 151:8 152:1,13,17 159:18 161:17 164:15 171:1 Z zahawi (4) 73:13 91:17,24,25 zaq (2) 92:17,19 zoe (1) 176:20 1 1 (6) 56:21 66:12 86:24 103:13 105:1 180:2 10 (6) 75:3 87:14 90:23,25 91:1,6 1015 (1) 1:2 102 (1) 180:4 103 (1) 88:2 10500 (1) 28:15 109 (3) 65:20 108:8,17 10s (1) 74:14 11 (5) 10:19 30:4 89:10 130:7 169:17 1145 (1) 54:25 1147 (3) 60:21 61:13 143:12 1159 (1) 61:15 12 (3) 88:17 130:5 167:23 120 (1) 89:12 123 (1) 89:12 124 (1) 180:4 1258 (1) 101:25 128 (1) 90:22 12th (1) 130:8 13 (7) 11:11,13 77:3,9 87:4 130:6 177:8 131 (1) 88:2 14 (2) 86:24 92:16 146 (2) 63:2 180:5 15 (4) 3:19 29:19 88:17 123:14 150 (2) 101:23 102:2 16 (1) 29:1 160 (2) 28:21,23 163 (1) 87:16 16500 (1) 28:11 17 (3) 97:23 99:17 129:25 18 (7) 26:23,25 27:22 31:17 34:8 87:6 100:13 180000 (1) 35:12 184 (1) 88:9 19 (6) 4:11 27:1,6 117:1 123:7 177:10 190 (1) 88:16 191 (1) 88:16 1989 (1) 24:21 2	2 (16) 32:8,13,16 33:17,21 34:1 38:7 50:21 51:7 123:8 135:15,17 136:17 149:12 153:25 155:20 20 (2) 22:24 123:7 200 (1) 27:2 2000 (3) 30:16 106:10,16 2004 (1) 140:16 2005 (2) 140:17 167:15 2006 (1) 35:11 2009 (1) 15:9 2010 (1) 24:21 2013 (1) 140:21 2016 (1) 140:25 2018 (1) 140:25 2021 (1) 5:15 2022 (36) 4:11 10:9,18 17:20 18:8,12 19:7 37:6 55:25 56:2,2,21,21 66:18 71:14,15,19,20 72:7 73:12,14,19,22 75:4,23 77:3,24 79:2 81:19 88:11 89:10,14 115:19 130:25 153:14 169:20 2023 (4) 47:23 141:4,17 174:17 2024 (2) 141:13,17 2025 (3) 47:20 66:12 141:13 2026 (4) 1:1 39:24 82:5 178:2 2027 (2) 144:3 145:12 21 (1) 149:23 211 (1) 91:5 212 (1) 91:5 22 (3) 56:21 140:16 146:17 23 (1) 66:6 239 (1) 88:16 24 (10) 9:13,14,15 21:17,19 22:1,4,14 30:5 74:2 243 (1) 88:17 25 (5) 1:1 71:20 73:12,13 95:8 256 (1) 146:8 26 (1) 169:20 27 (2) 56:1 65:14 28 (1) 30:1 29 (5) 87:7 91:9 117:1 176:16 177:15 3 3 (29) 32:9 33:17,22,23 50:21 51:7 90:3,6,10,11 94:16,25 116:2 124:21 126:5,8 130:23 131:17 135:3 136:17 137:7 141:16 144:8 149:12 155:20 156:1 159:5 161:3 180:2 30 (4) 25:3 100:14 123:13 167:15 300 (1) 44:8 305 (1) 146:6 31 (1) 24:18 310 (2) 123:25 146:10 35 (3) 97:22 98:19 99:16 351 (2) 50:17 94:19 37 (2) 146:16,17 38 (1) 106:23 4 4 (5) 85:16 86:13,24 90:23 116:17 40 (1) 106:24 400 (1) 177:9 4000 (1) 21:10 409 (1) 179:24 441 (1) 92:6 5 5 (3) 71:19 89:14 105:2 50 (2) 56:3 162:8 50minute (1) 101:22 53 (1) 87:8 530 (1) 27:1 55 (1) 15:8 58 (1) 88:9	 6 6 (7) 71:14 73:12,19 86:24 91:17 132:7 176:22 60 (1) 10:19 6000 (1) 106:14 623 (1) 156:1 69 (1) 28:22 7 7 (6) 71:15 86:24 88:11 91:17 177:4 178:2 71 (1) 180:3 74 (2) 28:24 129:22 75 (1) 98:15 8 8 (4) 11:10 44:8 161:4 167:23 81 (1) 11:4 83 (1) 180:3 8400 (1) 28:13
--	--	---	---