



Chair, Independent Monitoring Board  
HMP High Down  
High Down Lane  
Sutton  
SM2 5PJ

July 2025

Dear Chair,

**HMP HIGH DOWN: INDEPENDENT MONITORING BOARD ANNUAL REPORT  
FOR 1 JANUARY 2024 – 31 DECEMBER 2024**

Thank you for providing your Board's annual report on HMP High Down. I have read your report with care and would like to express my appreciation to you and your colleagues for your continued commitment and diligence in monitoring the prison.

I was saddened to learn of the deaths of two prisoners during the reporting year, as well as two further individuals who died shortly after release. I would like to echo the Board's condolences to the families and friends of those affected. Each case will be the subject of a thorough investigation by the Prisons and Probation Ombudsman, and I can assure you that any recommendations made will be taken seriously.

I appreciate the Board's ongoing concern about the use of the Care, Separation and Reintegration Unit (CSRU) for prisoners experiencing acute mental illness. While the number of individuals at HMP High Down who fail the medical algorithm remains low, as I previously stated, I agree that segregation is not an appropriate long-term setting for those requiring inpatient mental health treatment. The Government is taking steps to address this issue. The Mental Health Bill is currently going through Parliament and introduces a statutory 28-day time limit for transfers from prison to hospital under the Mental Health Act. This, alongside operational improvements being developed with NHS England (NHSE), the Department of Health and Social Care and other partners will help ensure timely access to specialist care. Oversight of the transfer process will also be strengthened through the recently established Mental Health and Justice Strategic Advisory Group.

Locally, HMP High Down has made improvements to local practice. This includes implementing the NHSE/His Majesty's Prison and Probation Service (HMPPS) Joint Care and Separation Unit (CSU) Standards Framework, which aims to improve the quality of care and management within CSU. The new model aims to deliver a multidisciplinary, person-centred and needs led approach responsive to the complex cases seen and managed in segregation. The prison has also provided additional training and supervision session for CSRU staff, put in place a process to escalate cases to the Prison Group Director to consider use of inpatient beds in nearby reception prisons for acutely unwell prisoners and is ensuring regular meetings with healthcare partners to ensure they are collectively supporting unwell prisoners. I welcome the Board's observation that reintegration planning for individuals leaving the CSRU has continued to improve. Moves are now planned with prisoners and often include phased relocations to support better outcomes.

I acknowledge the complex challenges faced by an ageing population. The Government is working with partners to develop a strategy specifically for older prisoners, following the recommendations of the Independent Sentencing Review which will address these issues. I am aware that HMP High Down has undertaken two recent Health and Social Care Needs Assessments, prompting increased NHS staffing and a review of care delivery. Additional measures, including dedicated activity spaces and multidisciplinary care planning, support the delivery of decent and appropriate care to this growing cohort. The prison is also exploring funding options to enable further improvements to the physical environment for prisoners with mobility issues.

I recognise the impact of capacity measures such as early release schemes on Offender Management Units (OMUs). Nationally, the Probation Service continues to invest in recruitment and training, exceeding its 2024/25 intake target and progressing a further expansion in 2025/26. At HMP High Down, the use of the Case Management Support model has enabled additional Prison Offender Managers to alleviate some of the pressures on probation staff. The numbers of Probation Support Officers and Case Administrators within resettlement have also been increased to further support OMUs. These measures alongside local initiatives to strengthen supervision, development and recruitment are helping to improve resilience and support.

Tackling the ingress of illicit items remains a challenge for much of the prison estate and HMP High Down continues to try to strengthen its response to this. It is actively participating in the National Drones Initiative, and a 400-metre restricted fly zone is now in place across all closed prisons in England and Wales. Local partnerships with law enforcement have led to several arrests and a reduction in contraband finds and Mandatory Drug Testing rates. This is supported by your comments on the positive impact of X-ray body scans.

I appreciate that a number of the concerns that you have raised in your report are repeat concerns and I hope this letter goes some way to reassuring you that we are committed to try to tackle these. Unfortunately, systemic issues often need a collaborative effort over a number of years to fix. I was encouraged, however, that you were able to point to some improvements including the positive comments received from prisoners and staff on the new Psychologically Informed Planned Environment, the strengthening of key work delivery and the increase in productivity following the return of PCOSOs to working in the laundry. I was also heartened to read that maintaining meaningful prisoner-family contact remains a strength for the prison and that HMP High Down is being used as a good practice model for introducing therapy dogs into other establishments.

I note you have raised some local issues of concern in your report which the Governor will continue to keep you updated on as work progress. HMPPS's comments in response to the issues you raised for its consideration in the report are set out in the attached annex.

The Lord Chancellor and I would like to reiterate our appreciation of the important role played by members of Independent Monitoring Boards throughout the estate. We are very grateful for your continued commitment on behalf of HMP High Down.

Yours sincerely,



**Lord Timpson**  
**Minister for Prisons, Probation and Reducing Reoffending**

## HMP HIGH DOWN: INDEPENDENT MONITORING BOARD ANNUAL REPORT FOR 1 JANUARY 2024 – 31 DECEMBER 2024

### HMPPS comments on matters raised in the report

#### **Prisoners with Mobility Issues**

The Government recognises the importance of ensuring full access to services and regimes for prisoners with mobility challenges. At HMP High Down investment has been made to improve infrastructure, including over £34,000 spent on lift repairs. Most lifts are currently operational, apart from the HB5 lift which remains under repair and the condemned Reception/Admin lift. The establishment has planned the installation of an access ramp to HB1 yard and is awaiting final contractor quotations. A bid to convert an existing cell into a fully accessible unit has also been submitted. Locally, the Governor and her team are working closely with the facilities management contractor to maintain lift reliability and continue to make individualised cell allocations, use temporary ramps and deploy social care supporters to reduce barriers to daily life and regime participation.

#### **Violence Reduction Programmes**

The Board's concern regarding the absence of 'Changing the Game' in 2024 is noted. The Governor shares the view that this programme provides significant value and has explored alternative funding sources including through NHS and education budgets. Nationally, while there is no singular violence reduction programme, HMPPS is delivering a staff training module on gangs and harmful group behaviours and has introduced electric razors in priority prisons to mitigate weapon use. The Governor intends to commission new violence reduction initiatives focused on young adults, pending available funding through the Dynamic Purchasing System or education allocations.

#### **Prisoner Pay Levels**

Pay policy is governed by a national policy which sets out minimum pay rates but permits local discretion based on operational priorities. HMP High Down's budget allocation was not adjusted when it transitioned from a Category B to a Category C prison. The Governor has implemented the 2024 uplift of £1 per prisoner per week and has agreed to overspend on prisoner pay using predicted underspend elsewhere. In October 2024, Governors received guidance encouraging innovation in pay schemes, including progression pay and bonuses, though the implementation of such schemes is at local discretion. The Governor continues to monitor pay equity in the context of available resources.

#### **Sentence Progression and Access to Offending Behaviour Programmes (OBPs)**

Access to OBPs is prioritised by proximity to release and risk level. While this may delay access for some longer-term prisoners, it reflects a needs-based model of delivery. The Psychology Services Group notes that effective rehabilitation also depends on education, employment, custodial behaviour and relationships within the prison. HMP High Down is currently supported by two OBP delivery teams and continues to monitor demand, considering the recent extension of Category D eligibility to those within five years of release. The Governor is committed to expanding OBP capacity as resources allow and welcomes future developments under the Building Choices Programme.