



Ministry  
of Justice

The Right Honourable  
**Stuart Andrew MP**  
Minister of State for  
Justice

Joint Chair, Independent Monitoring Board  
HMP High Down  
High Down Lane,  
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15 August 2022

Dear Chair

**HMP HIGH DOWN: INDEPENDENT MONITORING BOARD ANNUAL REPORT  
FOR 1 JANUARY 2021 – 31 DECEMBER 2021**

Thank you for your Board's report for the year ending 31 December 2021. I am grateful to you and your colleagues for your hard work, especially as Covid-19 placed constraints on your monitoring in person. I was saddened to hear there were three deaths in custody during the reporting year. As you are aware the Prisons and Probation Ombudsman (PPO) carry out independent investigations into deaths in custody and I would like to assure the Board my officials take recommendations from the PPO very seriously.

I acknowledge the Board's concern about the effects the Covid-19 pandemic has had on prisoner's wellbeing and mental health. In response to Covid-19 a Wellbeing Plan was created with input from mental health charity, Mind, to help prisoners reflect on triggers, coping strategies, as well as actions they could take to look after themselves at difficult times. A revised version of the Assessment, Care in Custody and Teamwork case management approach was implemented with prisoners receiving regular and dedicated one to one support from a keyworker which has enabled appropriate interventions to be introduced earlier before issues escalate. The increase in call volumes via the Samaritans' helpline noted by the Board has been seen in many prisons as a result of regime restrictions and prisons are working hard with the Samaritans to increase Listener numbers back up to pre-pandemic levels. In addition, The Prisons Strategy White Paper published in December 2021 sets out the vision for prisons of the future which will introduce a peer support model in selected prisons to train prisoners to support others. Locally at HMP High Down, wellbeing and mental health needs are being supported by additional dedicated resource in the Safer Custody team, as well as an increase in clinical psychological interventions. A retender of the healthcare provision is exploring an expansion of the mental health support. In addition, the decommissioning of the Inpatient Unit will allow funding to be reinvested into wing based specialised services, such as mental health provision and plans are underway to re-roll the Inpatients Unit to an Offender Personality Disorder Unit to provide high intensity support.

Regarding the ongoing concerns about prisoner's sentence progression to support their resettlement, it is recognised that there has been a transition period in the delivery of resettlement services in some prisons following unification of the Probation Service. Regional Probation Directors are working to stabilise the pre-release teams and Commissioned Rehabilitative Service (CRS) provision to secure improved service delivery to all prisoners. Key probation interventions, such as accommodation and personal wellbeing, are being delivered by CRS providers to sentenced prisoners and those on probation. Under the new resettlement approach all resettlement prisons will have an embedded resettlement provision managed by or linked to a Probation Delivery Unit. The embedded pre-release teams will provide pre-release services not currently available via the CRS which includes finance, benefits and debt services. HM Prison and

Probation Service (HMPPS) is working on extending the CRS contracts to provide accommodation support to those unsentenced with commencement expected this Summer 2022, as well as additional CRS contracts to commence in Autumn 2022 to provide finance, benefits and debt services.

I understand the Board's ongoing concerns about prisoners serving indeterminate sentences for public protection (IPP). Despite the challenges that Covid-19 presented, the latest published national figures at the end of March 2022 show the unreleased IPP population standing at 1,554. This is a reduction from 1,784 at the end of March 2021 demonstrating that opportunities remained available to IPP prisoners wishing to progress. It is important to note, that as the number of IPP prisoners who have never been released continues to decrease the proportion of those that remain in prison who have committed more serious offences and whose cases are complex grows. The risks and needs of these prisoners must be addressed before the independent Parole Board consider that they can be safely managed in the community. HMPPS efforts are continuing through the IPP action plan initiatives to support progression towards a safe release and following the publication of the Justice Select Committee report into the IPP sentence HMPPS will review the IPP action plan so that resources and efforts are focused on the right aspects of progression. Every effort also continues to be made to locate an IPP prisoner to a prison best placed to meet their sentence planning needs in terms of interventions as promptly as is reasonably possible and options are being explored to develop a bespoke Lifer/IPP Unit at HMP High Down to enable personalised support to be offered.

Turning to the Board's concern about prisoners with severe mental ill health who require transfer to a secure hospital, it is recognised that prisons are not an appropriate setting. The draft Mental Health Bill was published on 27 June 2022 which includes the provision to introduce a statutory time limit of 28 days for transfers to hospital as proposed in the Mental Health Act (MHA) White Paper published in January 2021. The Bill also includes a commitment to end the use of prison as a place of safety for individuals requiring assessment and treatment under the MHA. While the strategic direction of NHS England and Improvement continues to be the maintenance of existing hospital bed capacity, not an increase, NHS England and Improvement Commissioners in the South East, healthcare providers and prisons continue to work together to reduce the time between assessment and transfer. Additional resources have been allocated by NHS England and Improvement to support this, including the introduction of a clinically trained transfer coordinator to oversee all appropriate referrals and transfers to ensure they are managed as effectively and quickly as possible as well a weekly escalation meeting to address issues.

Although it has been a difficult reporting period, I am grateful to everyone working at the prison for their continued hard work and professionalism during the pandemic. It was pleasing to note that levels of decency are improving through the continued shower refurbishments and removal of window grilles. I'm informed HMP High Down formally transitioned to a Category C prison in April 2022 with a new substantive Governor in place in March 2022 and plans are continuing to improve the delivery of purposeful activity with further details set out in the attached annex and I look forward to the Board being able to report more positively in the coming year.

I note you have raised four local issues of concern in your report which the Governor will continue to keep you aware of as work continues. HMPPS comments in response to other issues raised in your report are set out in the attached annex. The Justice Secretary and I appreciate the valuable role played by members of Independent Monitoring Boards throughout the estate and we are very grateful for your continued hard work on behalf of HMP High Down.



STUART ANDREW MP

## HMP HIGH DOWN: INDEPENDENT MONITORING BOARD ANNUAL REPORT FOR 1 JANUARY 2021 – 31 DECEMBER 2021

### HMPPS comments on matters raised in the report

#### **Body Worn Video Cameras**

Further to last year's response, the procurement process for the next generation of Body Worn Video Cameras (BWVCs) has taken place with HMP High Down expected to receive the new equipment shortly. This procurement represents a substantial uplift in the number of cameras available to the entire public sector prison estate and, as indicated previously, will provide each prison with stock for every operational Band 3–5 Prison Officer on shift as well as a surplus. In conjunction with the procurement of new cameras, a review is underway of the current Prison Service Instruction (PSI) 04/2017 – National Security Framework – Security Management – Body Worn Video Cameras. A new policy framework to replace the PSI is scheduled to be published shortly alongside the rollout of the next generation BWVCs. This new framework will ensure that the new procedures of camera use are reflected including best practice and includes the mandatory wearing of BWVCs by operational Band 3–5 Prison Officers with prisons also able to target usage elsewhere as determined through their Local Security Strategy.

#### **Purposeful Activity and Offender Behaviour Programmes**

Whilst it remains the responsibility of prisons locally to manage their purposeful activity provision, HMPPS Industries, Retail, Catering and PE Services are keen to support prisons with their activity places and will be opening a new retail workshop at HMP High Down. This workshop will employ at least 90 prisoners on shift patterns and is due to open in Winter 2022/23. In addition, the HMPPS Prison Industries team will be visiting HMP High Down in due course to scope opportunities for introducing further work placements to fill the space left by Census Data. It is recognised that the regime at HMP High Down does not currently provide enough activity spaces to offer work for all prisoners. A part-time working model was launched in June 2022 which will increase access to purposeful activity providing the vast majority of prisoners the opportunity to attend work every weekday as well as providing increased time out of cell.

In terms of the education provision an action plan is in place to support how education will evolve to reflect the changing requirements of the population at HMP High Down. The Board can be assured that there will be no disruption to education delivery and the prisons education funding is being realigned to meet the needs of the population and improve on the existing opportunities that are already run to support prisoners to gain employment on release such as Railtrack engineering.

HMP High Down currently delivers the Thinking Skills Programme (TSP), Offending Behaviour Programme (OBP) and has recently reintroduced Sycamore Tree. A recent analysis of the projected prisoner needs at the prison has proposed an increase in the number of TSP places offered, as well as introducing the Horizon OBP to address the needs of prisoners convicted of sexual offences. HMPPS is currently in the process of determining the distribution of available resources allocated to prison based OBPs nationally and this will determine what HMP High Down will be able to offer in terms of increased TSP places and the Horizon OBP.

#### **Prisoners' Property**

Further to the response last year, the further consultation feedback has now been considered as well as further operational engagement which was necessary and adjustments to the new Prisoners' Property Policy framework have been made where appropriate. The Board can be assured that the new Framework will enable property to be handled with efficiency, care and respect. It will also ensure that staff and prisoners are clear on the arrangements in place as it provides clear requirements and includes

stronger guidance on known problem areas, such as volumetric control to ensure limits are respected and prisoners do not build up excessive amounts of property which require transfer or could be misplaced. The Framework is currently going through clearance processes and it is now anticipated that publication will take place this Summer. Locally the new regime at HMP High Down has created time in the day for staff to complete comprehensive cell clearances when necessary. Timeliness of complaint responses has also improved with overdue responses now monitored daily and assurance checks improving the quality of responses and reducing delays in resolution.

### **Canteen Refunds**

During the distribution of canteen on Tuesday and Thursday each week, DHL staff are available to answer any queries and document any amendments. Prisons inform the supplier and HMPPS Prison Retail Managers as soon as possible of any issues that arise but it remains the responsibility of prisons locally to reimburse monies owed to the prisoner which is returned to their spends account. It is anticipated that when the new retail workshop opens there will be the option for HMP High Down to directly pack canteen which would decrease administrative issues locally and ensure errors can be corrected promptly.