



# **Annual Report of the Independent Monitoring Board at HMP/YOI Downview**

**For reporting year  
1 May 2023 to 30 April 2024**

**Published September 2024**



# Contents

<b>Introductory sections 1 – 3</b>	<b>Page</b>
1. Statutory role of the IMB	3
2. Description of the establishment	4
3. Key points	5
 <b>Evidence sections 4 – 7</b>	
4. Safety	9
5. Fair and humane treatment	12
6. Health and wellbeing	17
7. Progression and resettlement	21
 <b>The work of the IMB</b>	
Board statistics	29
Applications to the IMB	29
 <b>Annex A</b>	
Service providers	30

**All IMB annual reports are published on [www.imb.org.uk](http://www.imb.org.uk)**

## Introductory sections 1 – 3

### 1. Statutory role of the IMB

The Prison Act 1952 requires every prison to be monitored by an independent board appointed by the Secretary of State from members of the community in which the prison is situated.

Under the National Monitoring Framework agreed with ministers, the Board is required to:

- satisfy itself as to the humane and just treatment of those held in custody within its prison and the range and adequacy of the programmes preparing them for release
- inform promptly the Secretary of State, or any official to whom authority has been delegated as it judges appropriate, any concern it has
- report annually to the Secretary of State on how well the prison has met the standards and requirements placed on it and what impact these have on those in its custody.

To enable the Board to carry out these duties effectively, its members have right of access to every prisoner and every part of the prison and also to the prison's records.

The Optional Protocol to the Convention against Torture and other Cruel, Inhuman or Degrading Treatment or Punishment (OPCAT) is an international human rights treaty designed to strengthen protection for people deprived of their liberty. The protocol recognises that such people are particularly vulnerable and aims to prevent their ill-treatment through establishing a system of visits or inspections to all places of detention. OPCAT requires that states designate a National Preventive Mechanism to carry out visits to places of detention, to monitor the treatment of and conditions for detainees and to make recommendations for the prevention of ill-treatment. The IMB is part of the United Kingdom's National Preventive Mechanism

## 2. Description of the establishment

HMP/YOI Downview is a closed prison (HMP) and young offender institution (YOI) in Sutton, Surrey, for sentenced women aged 18 and over, which does not serve the courts. The prison had an operational capacity of 356<sup>1</sup> (the maximum number of prisoners that can be held without serious risk to safety, security, good order and the proper running of the planned regime) for the reporting period, including a capacity of 16 on one wing solely for high-risk female transgender prisoners.

### 2.1 Background/overview

- During the Covid pandemic lockdown, at times the population of Downview dipped to below 200. By way of comparison, during this reporting year, we have seen the prison almost at full capacity of 356 at times (although ending the year in review at 324<sup>2</sup>).
- From May 2023 onwards, the Board started to see the multiple effects of population pressure in the prison estate. The prison felt extremely unsettled over the summer of 2023, with a significant churn of new prisoners arriving in the summer and into the autumn<sup>3</sup>. We were told that there had previously been an element of discretion by the offender management team about which women to accept, to fit in most effectively with the demographic at the time. However, this changed with the impact of population pressure. The prison then appeared to have more limited discretion regarding who they could accept, creating a frequently complex mix of women with, among other things, significant mental health needs, shorter sentences left to serve, drug-related issues and also non-association markers. The impact on various areas of the prison of an increased population and more complex demographic was significant, as outlined throughout our report.
- There was a rise in assaults on staff during the second half of the reporting year. The prison underwent increased searching efforts in response to increased levels of threat (described to us by operational staff as a 'lockdown') at the end of August 2023, with intelligence to suggest a major incident was imminent and the drug culture suspected of fuelling the situation.
- Staffing during the year was an issue at times. In May 2023, there was a hostage incident involving five women, with staffing acknowledged by the prison as significantly below the required weekend staffing levels<sup>4</sup>. Measures were taken to improve staffing levels during the summer (review of regime and staffing plans), with an acknowledgment from the prison that the population was more complex, with increased risks to safety, security and stability.
- New members of the senior leadership team started to join in May 2023, at the same time as the HM Prison and Probation Service (HMPPS) standards

---

<sup>1</sup> Figures included in this report are local management information. They reflect the prison's position at the time of reporting, but may be subject to change following further validation and, therefore, may not always tally with Official Statistics later published by the Ministry of Justice.

<sup>2</sup> The average population over the past three calendar years, as supplied by the Downview offender management department, has been 230, 260 and 330.

<sup>3</sup> A total of 44 new women arrived at Downview in May 2023, compared with 12 in the previous May. In September 2023, 65 women arrived, compared with 29 in the previous September.

<sup>4</sup> We were informed at the post-incident cold debrief that, at the time, staffing was 17 for the day. The prison, in response to the draft review process, has since stated there were more staff: 6 x band 2; 24 x band 3; 5 x band 4; 2 x band 5; and 1 x band 8.

coaching team arrived for four months to work alongside training and supporting staff. We saw various staff being moved around the prison into different roles (for example, one wing had five different managers in six months). There was emphasis from the Governing Governor on the prison's culture becoming more *'positive, more ambitious and more outcome focused'*, citing *'...frustrating drifts and stalling in some areas...'*. In the view of the Board, meeting management continued to be an issue, with various meetings cancelled, some perceived to be of minimal value and follow-up actions often poorly managed<sup>5</sup>.

- We continued to have concerns about effective management of poor staff performance. However, we can appreciate that the constraints of HM Prison and Probation Service's (HMPPS) performance management processes may be an obstacle. An effective Deputy Governor transferred to another prison in November 2023 as Governing Governor and a new Deputy Governor arrived in January 2024.
- In the Board's opinion, there appears to be an embedded culture of staff in the prison not being expected to read or respond to emails. This creates challenges for the circulation of information across the prison. During the year, the Governing Governor disseminated a range of strategic initiatives and new policies. However, we found that, at junior levels at least, staff were not always fully briefed and, therefore, unable to explain changes to prisoners. Poorly implemented policies can result in uncertainty and confusion for women, with conflicting standards expected by wing staff.
- It is notable that there was a 65% increase in applications by prisoners to the Board from the previous reporting year.

### **3. Key points**

#### **3.1 Our approach in this report and main findings**

Echoing the concerns expressed by many Independent Monitoring Boards, it has been disappointing to receive the Secretary of State and HMPPS's responses to our previous reports. They have appeared to be formulaic, side-stepping specific issues raised, a largely 'cut and paste' exercise and not reflective of the daily reality experienced by staff and prisoners at HMP/YOI Downview.

We wrote to the Secretary of State following his response to our previous annual report, expressing our disappointment in the content. We received a reply over two months later, which did not address our concerns. Hence, we have decided to focus only on key issues in our report for maximum effect and are hopeful of a more considered response to this year's report.

#### **Safety**

There has been a rise in assaults on staff and in the use of force, presumably due to a more complex mix of prisoners and a higher prisoner population (4.3, 4.4).

---

<sup>5</sup> For example, at the July 2023 monthly security meeting, 11 out of 13 actions were outstanding since April 2023.

## **Fair and humane treatment**

- The care and separation unit (CSU) has been at full capacity in periods during the reporting year. There were also acutely mentally unwell women housed in the unit, awaiting transfer to a psychiatric facility. The unit is not intended to be a therapeutic environment. At times, the Board observed extreme behaviour exhibited by certain prisoners, which had a significant impact on staff and other prisoners in the CSU (5.2). It has been reported to us by healthcare practitioners that for some acutely mentally unwell prisoners there was a noticeable further deterioration in the state of their mental health following their move to the unit.
- Despite a clear acknowledgement of its benefits by both the prison and prisoners, and also regular attempts to adapt the regime to accommodate it, the key worker system is still not embedded as planned (5.3).
- The increase in applications (prisoners' written representations to the Board) relating to property being lost when transferred from other prisons (notably from HMP Bronzefield) has increased by 147%, which is out of all proportion to the rise in population (5.7).
- Equalities work continues to appear to be a low priority in the prison (5.4).

## **Health and wellbeing**

- Prisoners requiring external secure mental health care are still waiting far too long for transfer to psychiatric units following assessment and referral (6.1).
- It was notable to hear anecdotal evidence that women with mental health issues are likely to receive a high standard of care in Downview (6.1).
- We have seen evidence of a more positive working relationship between healthcare and other departments in the prison (6.1).

## **Progression and resettlement**

- The Board does not have confidence in the accuracy of the data reported by the prison for attendance at education and activities for much of the reporting period. This forms part of the comparator data reported by HMPPS (7.1, 7.2). It is worth noting that the HMPPS targets against which the data is measured (of women at best being in some form of activity for just 22 hours per week) appear lacking in aspiration.
- The number of women on release on temporary licence (ROTL) from the prison has decreased significantly because of the recent decision, in early 2024, that most prisoners eligible for open conditions should be transferred to HMP East Sutton Park. This has had an impact on outcomes for transferred and remaining prisoners and also on the viability of industry partners in the prison (7.2, 7.3).
- There has been a significant increase in the number of women recalled to prison (7.3).
- Contracted family engagement services continue to remain inconsistent and poorly managed at the prison (7.4).

## **3.2 Main areas for development**

### **TO THE MINISTER**

- Please see our opening statement in paragraph 3.1. *Does the Minister have any comment?*

- Acutely mentally unwell women continue to arrive at the prison and often face long delays in transfer to psychiatric secure units, following assessment and referral (6.1). We are told that it is difficult to find psychiatric provision in suitable locations and that provision becomes a postcode lottery for certain women. The Board notes with concern that the draft Mental Health Bill (which would aim to ensure that eligible women are transferred within an appropriate time scale) has now been shelved. *What plans does the Government have to ensure that there is a sufficient number of psychiatric places and, most importantly, in the right geographical locations for women in prison?*
- There has been a significant impact on all aspects of prison operations and safety due to population pressure and the transferring of women with complex needs to the prison. As we have continued to raise since our 2019-20 report, the Ministry of Justice Female Offender Strategy (2018) sets out the Government's vision to see fewer women entering the justice system. *Can the Minister clarify what steps are to be taken to manage population pressures in the women's estate?*
- *Does the Minister agree that the delays, cited in 7.3, regarding the approval process for the transfer of a transgender woman prisoner to open conditions were unfair and inhumane?*
- The Board continues to have concerns about the contracted provision by PACT (7.4). *Does the Minister believe that the contract represents value for money?*
- The number of recalled women in the prison increased by 50% in each of the past two years (7.3). *What comment does the Minister have regarding this?*
- *Can the Minister please fully respond to all of our questions above?*

## **TO THE PRISON SERVICE**

- Based on the evidence from our monitoring, the Board does not have sufficient confidence in the accuracy of the attendance data for education and activities collated by the prison (7.1). *What additional external checks are carried out by HMPPS to ensure the accuracy of data reported by the prison?*
- We continue to see extremely high levels of property loss when transferring in from other prisons (a 147% increase from the previous reporting year). The Prisoners' Property Policy Framework appears to have had no impact in managing property loss (5.7). *How does HMPPS intend to improve this dire situation?*
- We query what impact the guidance in early 2024 of transferring most women who have reached open status to HMP East Sutton Park will have on the viability of established partners in the prison (such as the Clink, Max Spielmann and London College of Fashion) and newer employment partners to be engaged, as well as on the culture of Downview (7.2). Release on temporary licence (ROTL) numbers have also declined significantly (7.2, 7.3).
- We have seen examples of women who were transferred to Downview far away from their families (4.1, 7.4). This is counterproductive to the stated HMPPS rehabilitative aim of maintaining family ties. *Can HMPPS provide clarity on how allocation criteria are set and managed for transfers?*
- There is still no commissioned provision for dementia testing in the prison (6.1). *Given the trend towards a rising ageing population in prison, how does HMPPS intend to resolve this?*

## **TO THE GOVERNOR**

- The Board does not have sufficient confidence in the accuracy of attendance data for activities and education collated by the prison (7.1).
- The Board remains concerned about the implementation of key working (5.3).
- The management of PACT's contracted family engagement by the prison appears to be poor (7.4).
- Last year, we looked forward to seeing a renewed focus on equality and diversity, following the appointment of a new lead (5.4). The utilisation of the lead and the engagement of wider staff has been disappointing.
- It is disappointing to see the decline of the library provision in this reporting period (7.1).
- At times, the Board has struggled with getting prompt and comprehensive information from certain staff when required to carry out our statutory role. The Board is appreciative of the Governing Governor's attempts to resolve this. We would, however, like to acknowledge the prompt contributions from other prison functions.

## **TO THE IMB SECRETARIAT**

The Board had concerns in early 2024 about a suspected data breach involving the opening of a prisoner's confidential legal correspondence marked as Rule 39 (where a prisoner's legal correspondence can only be opened, stopped or read in specific circumstances). The Governing Governor's view, contrary to that of the Board, was that a data breach had not taken place. The Governing Governor contacted the CEO of the IMB Secretariat to escalate this issue without the knowledge of the Board. The CEO of the Secretariat was unable to provide the Board with notes of that conversation when requested (although they did confirm that no contemporaneous notes were taken). The situation raised significant concerns for the Board regarding the independence of our statutory role. The Board nevertheless notified the Information Commissioner's Office (ICO) of their concerns regarding the potential breach and the ICO suggested remedial measures for both the prison and the Secretariat. *What lessons have been learnt from the management of this situation?*



## Evidence sections 4 – 7

### 4. Safety

In the last quarter of the reporting period, the three internal teams managing safety and security who, to date, had run their own monthly meetings (namely, safer custody, security and drug strategy) decided to merge their individual monthly meetings into one: the safety, security, drug and harm reduction meeting (known as SDHRM). These meetings have proved both more informative and more efficient in terms of time and dissemination.

#### 4.1 Induction

- The induction process (acknowledged as a crucial time for prisoners) had worked well during its refresh in our previous reporting year. However, due to the increased number of arrivals in summer 2023, at times it felt chaotic and incomplete, with basic processes not functioning.
- Responsibility for the induction wing and process moved around different CM staff members, and there appeared at various times to be a lack of accountability for its operation.
- The previous induction passport system for each newly arrived woman (which listed the meetings with departments of the prison and external agencies and was previously chased up by induction wing staff) was discontinued. Instead, the onus was placed on the various departments/external agencies being accountable and managing their own attendance, rather than being audited by the induction staff. The Board is not optimistic that this system will function well and is likely to lead to women not experiencing an effective induction process.
- We saw various women arriving from other prisons with very short remaining sentences to serve<sup>6</sup> and family based far away. One woman arrived from HMP Eastwood Park with just a few weeks left to serve, and her family and release area was back in the Bristol area (significantly closer to HMP Eastwood Park than HMP Downview). Research is clear that women's mental health is likely to be impacted on transfer and we query the decision-making process behind some transfers.
- Prisoners arriving from other prisons often commented that transferring is as bad as being punished, as they usually lose work or education and, therefore, income, for several weeks.

#### 4.2 Self-harm, deaths in custody

- *The number of self-harm incidents has been high throughout the reporting period (up marginally on the previous year, but with rises and falls throughout the year).* There were 1,171 incidents of self-harm for the reporting period (compared with 1,153 for the previous reporting period). In May 2023, there were 74 incidents; in October 2023, 120; in February 2024, 143; in March 2024, 53. It was recognised that a significant number<sup>7</sup> of the women who engaged in self-harming behaviour were unemployed.

---

<sup>6</sup> The number of prisoners at Downview for less than a month increased year-on-year from 11% to 16.2% (50 women), as reported in November 2023.

<sup>7</sup> Averaged as 20% over the year, and for four separate months over 30%.

- *A small number of prisoners are engaged in prolific self-harming*<sup>8</sup>. In May 2023, four prisoners were responsible for 44 incidents; in October 2023, five prisoners were responsible for 80 incidents; in February 2024, nine prisoners were responsible for 106 incidents (74% of the total for the month).
- *The underlying level of self-harm (i.e. self-harming levels with the prisoners who engaged in prolific self-harm removed) has risen somewhat throughout the period, for example, from 30 incidents in May 2023 to 37 incidents in March 2024.* Analysis has not provided any triggers for this, despite efforts by prison staff spent trying to discover the reasons. Some incidents are single acts because of crisis, while others are repeated incidents, but do not meet the prolific criteria. Two women had to be treated externally in hospital following self-harm, and one self-harm incident required a hospital admission.
- *ACCT*<sup>9</sup>: in May 2023, 10.99% of the population was on an ACCT; in February 2024, it was 9.20%, but during the year, the figure was, at times, consistently lower (for example, it was 6.67% in November 2023).
- *There was a post-release death during the reporting year*<sup>10</sup>, when a woman was released on a Friday, a significant risk factor for vulnerable prisoners. Within five days, she had, sadly, apparently died of a drug overdose<sup>11</sup>.

### 4.3 Violence

- *Assaults on staff increased.* There were 48 incidents of prisoner-on-staff assaults in the reporting period (compared with 31 in the previous year). There were no serious injuries, but an increase in spitting, punching, kicking and hair-pulling (quite often whilst staff were attempting to remove ligatures from prisoners).
- *Prisoner-on-prisoner assaults increased slightly.* There were 26 prisoner-on-prisoner assaults (compared with 24 in the previous year).
- *More potentially violent prisoners.* There were two prisoners with a VIPER<sup>12</sup> score above three in May 2023 and six women with a VIPER score above three at the start of 2024, indicating a risk of increased violence in the prison.

### 4.4 Use of force

- *Significant increase in use of force incidents.* There were 310 incidents for the reporting period (compared with 142 in the previous reporting period). A member of the Board regularly observes the weekly use of force meeting.
- *Administration of the review process.* Although there are weekly, and monthly, meetings to review use of force incidents (viewed from body worn video cameras), there was a persistent shortfall in the paperwork required from involved staff through most of the reporting year. There was often a significant number of use of force reports outstanding (such as 40 in February 2024, for example) and we were concerned that 'reflection' meetings were often not followed up proactively.

---

<sup>8</sup> A prolific self-harmer is classed as an individual who self-harms five or more times in a calendar month.

<sup>9</sup> Assessment, care in custody and teamwork (ACCT) is the care planning process for prisoners identified as being at risk of suicide or self-harm.

<sup>10</sup> Since September 2021, the Prisons and Probation Ombudsman (PPO) has been investigating post-release deaths that occur within 14 days of the person's release from prison.

<sup>11</sup> At the time of drafting our report, the final report from the PPO had not yet been published externally, so we are unable to comment further.

<sup>12</sup> The violence in prisons estimator (VIPER) is a measure used to assess the risk of an individual's likelihood to be a perpetrator of violence in prison.

Occasionally, there was no video footage provided to view at the weekly review meeting. Towards the end of the reporting period, the process was tightened up considerably, with insistence on paperwork being submitted within the allotted 72 hours and video footage being required for viewing. Clearly, this is necessary if use of force incidents are to be properly scrutinised. But it is worth noting that there is a good deal of paperwork for staff to see to and some staff clearly find this easier than others (especially if the paperwork is to be completed when memories are fresh). Viewing video footage allows for both poor and excellent decisions to be used for learning (it is of interest to understand more about how this learning takes place).

#### **4.5 Preventing illicit items**

Incoming post for prisoners (including photographs, children's drawings, cards and other enclosures for a shorter period of time) has been photocopied since the start of 2024, which has been unpopular with prisoners but a necessary security process.

## **5. Fair and humane treatment**

### **5.1 Accommodation, clothing, food**

- The main feature of the period has been staff changes in residential. There were four heads of residence in the previous two years, one being in an acting-up interim position. Similarly, custodial managers (CMs – the most senior uniformed officer in the prison) have been rotated, with one wing having five CMs in the space of six months. This has made it difficult for the Residential Governor, his main aim being to establish CMs as wing managers and increase the confidence and capability of other wing staff (which is still a work in progress).
- The kitchen has had to make economies to stay within budget (having spent £3.04 per prisoner, per day, against a budget of £2.70), resulting in no 'treats' for prisoners. The menu changes were explained in advance and, whilst not exactly welcomed, were accepted. Overall, the standard of food is still good.
- The prisoners' forum has missed certain months over the course of the year. However, recent changes in representation and pre-meeting consultation may make the meetings more productive and useful once embedded.
- There has been a recent move to improve decency standards by supplying missing privacy curtains and establishing trained painting parties to improve the wing environment.
- A total of 20 applications related to accommodation have been received compared with 15 last year, an increase probably attributable to increased population and churn.
- Throughout the reporting period, there was a significant number of fire alarms on a weekly basis, many of which turned out to be false (and which were not collated). We have concerns that staff complacency could arise as a result of this.

### **5.2 Segregation**

- The care and separation unit (CSU) has, at various times, been full during the reporting period, and with overflow to other adjoining wings. There were 153 days' occupancy for our previous reporting period, with 167 for this reporting period. A total of 18 of the women located in the CSU were on ACCTs during their stay (compared with 21 last year).
- There were seven prisoners held for more than 42 days in the CSU (the limit allowed without external authorisation) during the reporting period (and with three prisoners held in CSU for over 70 days each).
- As in previous years, we saw a succession of women arriving at the prison who were acutely mentally unwell, many coming from prisons that had 24-hour healthcare and a larger mental health team than Downview. The women were often quickly moved to the CSU for their own safety and the protection of those around them. Safety should be a priority, but the CSU is a stark location, with 23-hour-a-day lock-ins, and it is not intended to be a therapeutic environment. On many levels, the CSU environment is also detrimental to mentally unwell women with its inappropriate accommodation (stark lighting and decoration; a harsh and disorienting atmosphere); lengthy lock-in; inability for women to access mental health teams at times due to the multi-officer unlock; safety PPE requirements and lack of 24-hour wraparound health care.

- CSU staff are not trained to treat or support severe psychiatric cases. The Board monitored staff dealing with a range of behaviours: severe aggression and repeated assaults; flooding and destruction of cells and furniture; bodily fluids thrown at them; unrelenting screaming and shouting (including racial abuse aimed at staff and other prisoners); and refusal to eat or wear clothes. This has a significant toll on the staff and other prisoners who are moved to the CSU on good order or discipline (GOoD) rules (when they have behaved in a way that risked harm to other prisoners or caused problems for the rest of the prison), or cellular confinement.
- For example, towards the end of the reporting period, mental health staff made a significant effort to find a suitable psychiatric location for a woman housed in the CSU who was acutely mentally unwell. She deteriorated in the CSU to the extent that her feet were in a poor condition, due to her flooding the cell and frequently urinating on the floor, meaning that she was required to relocate regularly to another cell whilst staff deep-cleaned her previous cell. She often chose to be naked. We were informed that the mental health team of HMP Bronzefield had agreed to accept her, but that the prison itself had refused. The woman remained in Downview's CSU for almost a month prior to her transfer to a psychiatric unit.
- In making these observations, the Board is acutely aware of the dilemma articulated by prison and healthcare staff in housing acutely mentally unwell women in the CSU. However, there is no immediate alternative for their safe management in a prison environment.
- Staffing in the CSU has been low at times (short of three members of staff early in 2024), particularly notable in the environment of supporting highly volatile prisoners. This has resulted in a challenging situation. For example, in January 2024, there were nine women in the CSU (and the overflow area)<sup>13</sup>. For the safety of staff, three of the women were on three-officer unlock; two were on supervising officer plus three-officer unlock; and four were on standard two-officer unlock. This placed an enormous burden on staff in safely managing the unit and facilitating time for showers and exercise.
- **Our observation firmly remains that CSU staff display extraordinary resilience, patience and compassion for the women in their care.** Since many use of force incidents occur in the CSU, it is clear to see this from the body worn video camera footage regularly viewed by the Board.

### 5.3 Key workers, staffing

- Despite a clear acknowledgement from the Governing Governor that key working is '*proven to have a significantly positive impact on safety, security and stability*', the operation of the key worker scheme has been patchy, with effective work in some areas but in others a lack of continuity. There was regular reassurance throughout the reporting year that time for key workers would be built into successive regime reviews. However, rates of key working compliance remained at around the 30% mark (although falling to 22% at some stages in the reporting period). HMPPS guidance is that key working should happen weekly; Downview extended this to fortnightly sessions and the expectation now appears to be monthly. As a Board, we carried out a prisoner survey of attitudes to key worker provision in late 2023/early 2024, with the following key findings: *women were*

---

<sup>13</sup> The CSU has six cells.

*confused about what their meeting entitlement should be, with 45% of the sample having a less than positive experience of key working; but when key working operated well (and we heard some good examples of this), women were extremely positive about the benefits of it.*

- **Staffing:** by the end of the reporting period, staffing was above the target strength figure (following lower staffing levels in summer and autumn 2023). However, a quarter of staff were in the 0-1 year service group (and, therefore, less experienced). Levels of absence due to staff sickness were a significant concern. Downview was placed as the third highest in staff sickness absence rates for March 2024 out of the ten prisons in the women's estate.

## **5.4 Equality and diversity**

- With the arrival of a new equality and diversity lead in July 2023 (after a lengthy vacancy), we saw more diversity data being produced. However, the Board's perception remains that equality and diversity work has a low priority in the prison.
- The equality and diversity lead was tasked with resolving the longstanding issue of lack of skin and hair products for black, Asian and minority ethnic women for sale via Gladragz, the prison shop. This took up a considerable amount of her time in sourcing and distribution and diverted her from more strategic equalities work.
- Forums for different protected characteristics were allocated to senior staff to champion. From our observations at equality meetings, there was minimal proactivity or accountability for the role from wider staff. We were told that the prison was not proactive in facilitating equality and diversity training for officers, as proposed by the equality lead. Interrogation of functional equalities data for proportionality appeared not to be happening routinely, due to it not being provided to the diversity lead by departments. We will continue to monitor for signs of the '*regular, meaningful consultation across all protected characteristics*' cited by the Governing Governor in the prison priorities document issued in February 2024.
- Following the change in HMPPS policy in May 2023<sup>14</sup>, several transgender women arrived on the wing for high-risk transgender women prisoners, increasing the population from the previous single resident. Over the course of the reporting year, there were between three and five transgender women located on the wing at any one time (with 16 places ring-fenced for the wing, even in the time of acute population pressure). Certain prisoners were not willing to access the purposeful activity on offer, as they were not prepared to be supervised (sight and sound) in the rest of the prison as mandated. For much of the reporting period, the regime on this wing remained limited and unstructured, with activities for most residents confined to cursory cleaning, with significant amounts of attendant television watching, and no enforced lock in. There were sporadic efforts at times to improve this by the prison. However, we saw delays in accessing basic provisions to improve the regime (such as cooking utensils and, later, basic cookery skills classes, for example). The Board queries the rationale (in the face of general financial constraints across the prison) for the provision of an 'energy wall', costing £10,000, for this wing for just three prisoners (and which couldn't then be installed on the wall for some time as required). The energy wall is not popular with these

---

<sup>14</sup> <https://www.gov.uk/government/news/new-transgender-prisoner-policy-comes-into-force>

residents and has not often been used. We question whether it could have been located elsewhere in the prison (where a wider number of prisoners would have had access to it, such as perhaps the gym) or the funds for it could have been used for alternative provision for the particular wing.

## 5.5 Complaints

- The number of complaints to the prison from prisoners continues the trend to increase year on year. Last year's complaints increased by 26%; this year, the increase is 44%. An increase of this proportion is due in part to the rise in population. The categories with the most substantive increases were residential (up by 68%), staff (up by 72%) and food (up by 130%). Of the 26 subject categories, eight had the same or fewer complaints than last year and the remaining 18 had increased complaints. A total of 64% of complaints were answered on time, compared with 60% last year. The details of overdue replies to complaints are circulated daily and are the subject of discussion at the morning meeting.
- The number of complaints directed to other establishments has doubled this year and replies from other prisons still tend to be overdue. While HMP Bronzefield has improved its response times, there still appears to be little regard for replying within the required time frame.

## 5.6 Property

- There were 31 applications to the Board relating to property within Downview (category H1), which have remained stable compared with last year (28 applications). Overall, prisoners' property is handled well whilst within the prison, but occasional mistakes can occur.
- Applications to the Board relating to property from other prisons increased by 147% in the reporting year (at 47 compared with 19). Applications referring to canteen, facilities lists and catalogues (category H3) have risen threefold (from three last year to nine during the reporting period). This may be due to increased use of external direct suppliers such as Amazon.
- We are not aware of a staff single point of contact for property issues<sup>15</sup>, nor a maintained centralised log for the recording and management of property issues, both of which could help prisoners in their efforts to retrieve property.
- The most distressing cases observed are prisoners arriving from local prisons missing all or some items of their property, which we often saw in the induction process. An application to the Board from one prisoner related to missing house keys, which should have been treated as valuables. Another application saw the woman's credit card, phone and other valuables bundled up with other belongings and not treated as valuables.
- One woman had a parcel of clothes sent to HMP Peterborough, but she was then transferred to HMP Downview before receiving it. The parcel was sent tracked with Royal Mail – a cursory review of the tracker by a Board member showed that it had been duly delivered to HMP Peterborough. Despite this evidence (and her putting in a complaint to Downview at Governor level and to HMP Peterborough), the woman received no satisfactory resolution to the issue. We were told by HMP Peterborough that there was no evidence of delivery to the prison, despite us supplying them with clear proof from Royal Mail. We advised the woman to submit

---

<sup>15</sup> A recommendation in the Prisoners' Property Policy Framework.

a claim to the Independent Prisoner Complaints Investigations (IPCI) service and provided her with copies of the Royal Mail tracker information. Like all prisoners, the woman had limited access to any means of investigation or escalation of the issue. She was extremely frustrated by both prisons' failure to help her.

- The Board always does its utmost to recover prisoners' missing property from other prisons. The Board has produced this year an easy-read leaflet to advise prisoners of the internal prison process and the IPCI address, process and application form if the internal prison process fails.
- Due to the regular cross-deployment of reception staff, the waiting list for women wanting to access their stored property, especially for seasonal changes, remains long.
- We monitored two situations during the reporting year where a prisoner's 'Rule 39' confidential legal correspondence was not processed appropriately by the prison. One box of legal correspondence spent almost a month in the prison in various places before it was given to the prisoner.



## 6. Health and wellbeing

### 6.1 Healthcare general

- The interface between the prison and healthcare is perceived as more positive than in recent years.
- Following a review and revision of the healthcare complaints' process during the reporting year, we can report a general reduction in concerns and complaints submitted by prisoners relating to healthcare. The main theme for complaints regarded accessing healthcare services.

### Mental healthcare

- *Delays in the management of acutely mentally unwell women.* We saw increasing numbers of acutely unwell women who required assessment and transfer to a psychiatric setting (from nine in the previous reporting period to 15 in this period). Almost all of the women did not meet the 28-day timeframe for transfer, as per the National Good Practice Guidelines<sup>16</sup>. Some exceeded the timeframe significantly.
- A typical transfer location is a psychiatric intensive care unit (PICU), or medium- or low-secure unit. The perception is that there are few places for women in PICUs, but that there are sufficient medium- and low-secure beds, although not necessarily in the right locations. One woman was sent from Downview to a PICU in Durham (a very long distance from her family) after significant efforts to find her a more local place.
- It appears that there is a form of postcode lottery, depending on which local NHS trust is required to accept the treatment of a prisoner (typically based on where the woman originated from). Some units for the treatment of personality disorders are private and the local NHS Trust appears reluctant to fund treatment there<sup>17</sup>. We monitored widely varying outcomes for women, in terms of length of transfer process and eventual outcomes, dependent on the receptiveness of the woman's local NHS trust to accept their transfer. Some very unwell women denied transfer from Downview were then detained at the gate on release by community mental health teams.
- The impact on the women affected and on staff and other prisoners is significant, as they are often held in segregated conditions pending their transfer. Despite the considerable efforts of staff to mitigate the prevailing conditions in the CSU, it is categorically not the appropriate place to hold acutely mentally unwell prisoners.
- Comprehensive care planning and cross partner working by the mental health in-reach team at the prison is in evidence.
- *Parity of care.* The Downview mental health provision is modelled on the community mental health team delivery model. Many of the women on the mental health team's caseload would not be eligible for support in the community but do receive treatment in Downview. Anecdotally, in-reach mental health lists are

---

<sup>16</sup> <https://cloud-platform-e218f50a4812967ba1215eaecede923f.s3.amazonaws.com/uploads/sites/19/2024/02/The-long-wait-web-2024.pdf>

<sup>17</sup> One woman's NHS trust refused her access on funding grounds to a suitable private provider, despite her being clinically accepted by the unit. After tireless efforts by the mental health team to secure her support and a 'lack of proactive response from her local NHS trust', she was eventually sectioned on release.

shorter in Downview than in the community<sup>18</sup>. For example:

- Step three programme: in the community, there is a six months+ wait for psychiatry assessment and a 10-12 months' wait for psychiatric support, compared with Downview, at a 2-3 months' wait for psychiatric support. As of the end of the reporting year, there were 6/7 people on the waiting list at Downview for the psychiatrist.
- ADHD diagnosis: at Downview, there were 27 on the waiting list for assessment at the end of the reporting period due to staffing issues, compared to a two-year wait in the community.
- Co-morbidity of drug use and mental health issues was challenging throughout the period, with half of the population of the prison, as at the end of the reporting year, being on Forward Trust's caseload.

## Primary healthcare

- *Medication distribution.* The smooth running of medication distribution remained an ongoing challenge and continued to impact on the timing of the regime and on drugs trading throughout the prison<sup>19</sup>. The efficiency of the distribution process often appeared to depend on staff training and experience<sup>20</sup>. During the reporting year, in-cell medication lockers were installed on all wings, except D Wing, and the drug strategy lead and the women's health lead have been supporting officers with medication supervision.
- We received various reports about supply issues surrounding medication (which appeared to be related to national supply shortages, but also inefficiencies in the ordering process and storing by healthcare).
- *Did Not Attend (DNAs).* We saw a significant improvement in DNAs for appointments throughout the year (particularly for GP appointments) and also for waiting lists. The waiting list for GP appointments increased from two to four weeks at one point, settling at three weeks towards the end of the reporting period. This was largely due to an increased population and staffing issues.
- *Prisoner movement.* There remained some confusion for much of the reporting period in terms of the issuing of movement slips, the management of clashing appointments, a lack of clarity regarding attendance at activities and poorly-briefed escort officers. Prisoners now receive appointment slips a day before their appointment. Various women reported that they had not received their movement slip or were not collected to attend the appointment. Going forward, healthcare is to put all appointments onto the prison's IT system to be added onto movement lists.

---

<sup>18</sup> In order to account for the increased health needs of prisoners, prisons are supposed to provide equivalency of care rather than mirror community services - this means that prisoners should receive a better standard of care to obtain equivalent outcomes.

<sup>19</sup> The prison's drug strategy team work with healthcare, Forward Trust and the security team to reduce incidents of trading, but we saw minimal impact of reduced trading as a result.

<sup>20</sup> One morning's monitoring by a member of the Board in October 2023 observed an incorrect prisoner list being initially given to prison staff by healthcare, a 25-minute delay to access the correct list (which was not in a clear order), which then had to have 12 extra names to be added and about 30 women on it not attending for medication distribution. Staff on one wing were contacted five times (over a period of 20 minutes) before they responded to bring patients to the hatches.

- *Dementia care.* There remains no dementia care provision for prisoners in Downview<sup>21 22</sup>. Two women assessed as requiring access to dementia clinics were denied support during the reporting year.
- *Operating hours.* Towards the end of the reporting period, healthcare's operating hours were extended from 7am to 8pm daily (from 07.15am to 6.15pm previously). This was in response to concerns we regularly heard from certain prisoners that they were required to take sedative medication too early in the evening to sleep through the night (we heard reports of some medication being taken as early as 4pm). We then saw delays from the prison in adapting the regime to take full advantage of this provision (which remained unresolved as of the end of the reporting year).
- *Smear tests.* As reported in our previous annual report, Downview still do not have a trained practitioner to carry out smear tests and it remains dependent on assistance with this procedure from HMP Send.

## 6.2 Regime

The absolute maximum allocated time (which is not available to most prisoners) for purposeful activity is 22 hours per week. The maximum length of the working day is four-and-a-half hours, which has been highlighted by the Employment Advisory Board as a concern, as it bears no correlation to employment opportunities in the community.

## 6.3 Drug and alcohol rehabilitation

- As of April 2024, Forward Trust had a caseload for drug and alcohol support of over half the women in the prison (about 170), 70 of whom were on methadone (acknowledged to be a high ratio for the population). The general perception of prison and healthcare staff of the support provided by Forward Trust in Downview was extremely positive.
- The incentivised substance-free living unit, which opened in March 2023, had been largely under-utilised. In February 2024, we saw the unit relocated to another wing and under the management of an effective member of staff. We will continue to monitor the unit with interest.

## 6.4 Soft skills

- The extremely popular therapy dogs' programme lapsed in early 2024 due to an issue with the tendering process. The Board hopes that it will be reinstated shortly.
- During the reporting year, weekly mindfulness sessions (which were initially popular when introduced in September 2021) failed to attract enough women to be financially viable and the contract was not renewed in April 2024.
- Park Run has continued through the year, although it has been subject to ongoing disruption due to staffing.

---

<sup>21</sup> As of early 2023, when we carried out a thematic monitoring exercise on older prisoners, the prison had 32 women over the age of 50.

<sup>22</sup> Local services report that they are not commissioned to take referrals from prison. This has been escalated to NHS England Commissioning. There have been meetings, we understand, with the commissioning manager for mental health and learning disabilities from the Integrated Care Board. It has been agreed that the prison population would fall under its responsibility, and it would discuss this with its providers. This process appeared to have stalled towards the end of the reporting period.

- Eight prisoners completed the Duke of Edinburgh Award scheme.
- We have concerns regarding the popularity and utilisation of the gym by prisoners. At the end of the reporting period, we saw a move to introduce more classes, gym sessions and other initiatives after a physical education needs' analysis was carried out. Provision will be subject to staffing – we were told by gym staff that they were cross-deployed for about 26% of their prisoner allocation during the reporting period (although the prison stated to us that this was 10%).

## 7. Progression and resettlement

### 7.1 Education, library

- Milton Keynes College has been the provider of education at Downview since April 2023. The Board has been able to access only limited information in this area during the reporting year.
- *Accuracy of attendance data.* We have concerns that the attendance data reported by education and activities has not been consistent with the number of women actually in attendance. There is minimal visibility of attendance data, generally<sup>23</sup>. For a brief period, it was listed in the daily operational report, although this has lapsed. The prison has carried out unlock audits from time to time, which also identified issues with the data recording process. In addition, the Board carried out various ad hoc spot checks on the wings to monitor attendance. During September 2023 to March 2024, eighteen different landings were spot checked by a member of the Board.
- A new system had started in December 2023 for wing officers to record when women had departed the wings, and this is the data logged for attendance purposes. It was raised at the Employment Advisory Board that attendance should also be double-checked and chased at the place of activity as well, by teachers/instructors (this was implemented later, in spring 2024). When we cross-checked the women remaining on the wings from our own monitoring, it did not always tally with that reported by the prison. For example, in December 2023, a Board spot-check one weekday afternoon demonstrated that only one-third of women were out of their cells and engaged in some sort of purposeful activity. One weekday afternoon, as many as 24 women had remained on one wing, according to the Board's monitoring. From September 2023 to March 2024, 18 different landings were spot checked by a member of the Board. On average during the spot-checks, 45.7% of women were engaged in purposeful activity (including wing work, library, beauty appointments). At best, one landing achieved 69% and at worst 27% of women who were not locked in during the time when purposeful activity was offered. Minutes from the June 2023 reducing reoffending meetings stated: *'Discussion on low attendance in education. Unlock list not being printed consistently by wing officers. Getting ticked into education, then leaving straight away before end of movement. Women saying, "not required by teacher" as one of the reasons.'*<sup>24</sup> A member of the Board monitored (in March 2024) 49 women being logged as attending education. However, on further investigation, ten of them had immediately gone back to their wings, as hair and beauty was closed due to absent tutors.
- Attendance data is collated by the prison and published by HMPPS for comparison with comparator prisons. The data are based on an HMPPS target set for the prison of women doing *just five 2.5 hour sessions a week of purposeful activity*. The figures collated do not include those women not actually allocated to education or work (of which we were told by the prison that this was an average of 9.5% of the population).

---

<sup>23</sup> The November 2023 twelve month review of the Employment Advisory Board (EAB) strategy commented "*poor attendance / transparency in both work and education are limiting efficacy of EAB*".

<sup>24</sup> We also saw evidence of women coming back from activities within a short time of arrival, as not enough staff were available (e.g. gardens), but they would be signed in as attending, nevertheless.

- *Based on the evidence from our monitoring, the Board does not have sufficient confidence in the accuracy of the attendance data collated by the prison for most of the reporting period. We started to see efforts to improve this by the prison towards the end of the reporting period, but we will continue to monitor.*
- *Attendance.* Average attendance at education against planned capacity over the year was 59.4% (this fell to 38% in June 2023). Causes for non-attendance were identified by the education department as ‘cultural’ (although not clarified) and also a “lack of accountability for course operators”<sup>25</sup>. The prison KPI for attendance at maths level 2 is just 71%<sup>26</sup>.
- *Achievement in core subjects / low targets.* Numbers appear low in core subjects for the size of population, as per the table below which shows the number of women achieving functional skills Maths and English by quarter<sup>27</sup>:

	Q1	Q2	Q3	Q4
<b>Maths</b>	5	22	16	21
<b>English</b>	14	13	12	26

- *Personal learning plans process.* A general consensus from prisoners and certain staff is that the personal learning plans for prisoners, often agreed in the first couple of weeks of a prisoner’s arrival, when women were ‘like rabbits in headlights’, were too rigid and not all women were provided with access to their own plans. This meant that women could not change the plans during the following 3-6 months if clearer/changing needs were identified, which was extended to a six-month review at the end of the reporting period.
- *Transparency.* We had regular reports from prisoners about a lack of transparency for education and work allocation and waiting lists, which understandably caused frustration. In summer 2023, with a high churn of arrivals, the average wait to be allocated employment was 4-5 weeks, and we heard examples in December 2023 of a seven-week wait.
- This year, one of the main challenges for education was an increase in overall population and in women on shorter sentences (two years and below) or with less time to serve before release. In response, a wider range of classes including shorter and more creative courses were introduced to meet the women’s needs. A change of approach also resulted in digital learning being embedded across the curriculum, particularly in functional skills such as Maths and English, to motivate and engage learners.
- *Library staffing.* From being a shining star at the prison, with its attendance by about 80% of women in previous years and numerous literacy initiatives, we were concerned to see that the library went into significant decline in this reporting period, following the retirement of the previous librarian in June 2023. Due to staff shortages, the library had to reduce its service to the bare minimum until, by March 2024, the six staff who covered HMPs Downview and High Down had all

<sup>25</sup> As per EAB minutes June 2023.

<sup>26</sup> Information provided by the head of education, works and skills and as per minutes of the EAB, June and July 2023 (following reference to “*education attendance rates a problem*” in June 2023 and “*education attendance rates still a problem*” in July 2023 and reference to next steps for the head of education, skills and work to “*increase accountability for attendance*”).

<sup>27</sup> As per document titled “*Milton Keynes College performance outcomes 2023/24*” supplied by the prison.

resigned. The former librarian came out of retirement to keep the Downview library open two days a week. In late April, a new librarian was appointed and was undergoing vetting at the end of our reporting period. Surrey County Council are responsible for library staffing.

## 7.2 Vocational training, work

- *Employment Advisory Board (EAB)*: The chair of the EAB continued to provide an effective strategic contribution, despite ongoing frustrations expressed regarding attendance by, and input of, senior staff at the monthly board meeting and a perceived failure to make fast-paced change<sup>28</sup>. The Downview EAB has been cited as evidence of best practice and used as a learning example for other EABs<sup>29</sup>. The changing prison demographic (such as, for example, shorter sentences, more women on recall<sup>30</sup>, more women with a background of violent or sexual offences, more women with substance abuse or mental health issues or an arson offence) created a need to adapt training offerings and also impacted on data for employment post release.
- *Employment partners*. Despite these challenges, the work of the employment lead and community engagement manager remained particularly effective<sup>31</sup>. A number of new employers such as Wagamama, Suez Group, Paul UK, Pret A Manger, Iceland, Wilmot Dixon and Headmasters, were introduced to the prison and started to recruit prisoners during the reporting year. There were two highly popular trial sessions in the prison with a car wash company and Wagamama. We continued to hear regular reports from prisoners (and observed it from our monitoring) regarding the extraordinary efforts to which the employment lead and the community engagement manager went to secure employment opportunities for women for their release<sup>32</sup> (often with the fundamental link to accommodation), going far above and beyond their role in securing positive outcomes for women.
- *Transfer to open conditions*. In February 2024, the Board was made aware that prisoners who were re-categorised to open conditions would now be prioritised to transfer to HMP East Sutton Park (ESP), due to population pressure. This was against a backdrop of population headroom at Downview of on average about 20 places. There remained some confusion amongst senior staff about where this decision emanated from (locally or HMPPS Women's Group) and also a lack of clarity on how it was applied. We query whether there are challenges in the

---

<sup>28</sup> Extract from EAB strategy 12 month review, November 2023: *"The culture of 'Hopes and Dreams' has not been effectively embedded with key actions missed, delayed or only partially implemented – the women in the forums raised most of the same issues and experiences this year as last. This lack of implementation has limited the effectiveness of the Employment Advisory Board and means that progress in improving outcomes through employment in 2024 will be lower than hoped for"*.

<sup>29</sup> We were told that examples from Downview are to be used in a forthcoming Women's Estate EAB guidance document.

<sup>30</sup> Equalling 8% of the population, for example, in November 2023.

<sup>31</sup> With reported numbers of women in employment at six weeks and six months post-release from Downview, at times being the highest or in the highest group in the closed/entire women's estate during the period.

<sup>32</sup> We heard of one situation where a combination of the employment lead, strategic housing lead and prison offender manager spent an estimated 30 hours tenaciously lining up a woman's accommodation in an area where the housing authority was reluctant to offer housing by demonstrating secured employment for her in the area.

Governing Governor of Downview also being the Governor of ESP in this scenario.

- It was unclear whether there was any discretion for eligible women to remain at Downview – the advice from the HMPPS Women’s Group relayed to the prison was to ‘*encourage and cajole*’ prisoners to transfer (although we are mindful of the inevitable power imbalance in a prison setting). We were informed that women working at the prison’s industry partners (The Clink, Max Spielmann, London College of Fashion) were ring-fenced from being transferred to ESP, but then heard reports that some were, in fact, transferred. Eligible prisoners reported to us that they felt anxious about the decision and unclear about its application. As a consequence, the number of women on open conditions at Downview decreased from 22 in late 2023 to nine in March 2024. There are several outcomes (both short and longer term) emanating from this decision for women at Downview:
  - *The perspective we regularly hear from prisoners is that ESP is an unpopular choice for progression, due to shared rooms, a rural location and a lack of transport connections to London employers. Certain prisoners told us that they were deliberately avoiding the possibility of applying for open conditions (citing ‘keeping under the radar’ of the offender management unit) so that they could avoid being transferred to ESP. This is entirely counterproductive to their rehabilitative journey.*
  - *We monitored women in the process of achieving valuable vocational training with The Clink and Max Spielmann, who were required to move to ESP and were not able to finish their training. There was frustration expressed by staff at The Clink and Max Spielmann regarding this disruption. Towards the end of the reporting period, The Clink was unable to utilise any Downview prisoners to staff external events, as had been common practice.*
  - *At the end of the reporting period, The Clink, Max Spielmann and the London College of Fashion<sup>33</sup> had no women from Downview out on release on temporary licence (ROTL), acknowledged as an important progression route for women leaving prison.*
  - *The combined efforts of the EAB, the prison employment lead and the community engagement manager have been successful in attracting various new employment partners to the prison. The Board queries whether existing and new partners will continue to invest their significant time and financial resources in the Downview environment when there are fewer or no women available to progress to their ROTL employment opportunities.*
  - *The EAB has focused on developing a culture of aspiration for women in Downview, with a series of four awards events since summer 2023, where women who have progressed to opportunities on open conditions and ROTL were celebrated, amongst others<sup>34</sup>. Role models are important to enable women to progress and, going forward, there will be fewer such women in the prison.*
- The London College of Fashion continued to provide an extremely effective and supportive working environment, with its manager being appropriately recognised by the Butler Trust in early 2024.

---

<sup>33</sup> Between them employing about 10% of the prison’s population.

<sup>34</sup> 113 achievement certificates were awarded at the ceremonies.



- The Downview CU172 purposeful activity attendance (overall) target for 2023-24 is 75% attendance of eligible and allocated prisoners to attend *five or more sessions* (of 22 hours in total) each week. Downview recorded average attendance as 77% at the year end, in April 2024. Note our comments above (7.1) regarding the Board not having sufficient confidence in the accuracy of the attendance data collated by the prison, which applies also to attendance at work.

### 7.3 Offender management, progression

- *Population pressure.* A larger population and more churn of prisoners led to a significant increase in activity for the offender management team. By way of comparison, in the calendar year of 2022, there were 287 receptions from other prisons and from 1 January 2023 to 9 February 2024, 473 receptions. At the end of the reporting year, the team experienced staffing issues and took measures to manage their workload, meaning that some women would not see their prisoner offender manager as frequently as they might need to.
- *ROTL.* The ROTL application process was transferred back to the offender management unit from the reducing reoffending team in May 2023. Total ROTL numbers decreased from 15 women on ROTL in May 2023 to four women in April 2024 (with just one on paid ROTL), and with 135 days of paid work ROTL in May 2023 decreasing to 19 days in April 2024. The main barrier to increasing the number of women able to access working ROTLs is the lack of suitable candidates awaiting recategorisation to open conditions, exacerbated by the risk of them then being automatically transferred to ESP.
- *Imprisonment for Public Protection (IPP)*<sup>35</sup>. There were four IPP prisoners as of the end of the reporting period. One prisoner had been in prison for over 16 years for an offence that had a tariff of less than two years – there have been nine parole reviews for the prisoner in this time. The prisoner said that prison ‘*has institutionalised me*’, that they had ‘*nowhere to go*’ with their progression and that they would ‘*end up rotting in here*’. One IPP prisoner in Downview had been recalled five times.
- *Foreign national prisoners.* Population pressure also had an impact on the progression of foreign national prisoners. In the summer of 2023, immigration officials were attending the prison monthly for appointments with women rather than the previous weekly basis<sup>36</sup>. Hibiscus<sup>37</sup> also had minimal presence in the prison for much of the reporting year due to staffing issues, which impacted on support.
- *Ministerial intervention.* We have reported in a previous annual report about Ministerial intervention in resettlement decision making and we saw this again with the management of the progression of a transgender woman located on the wing for high-risk transgender women prisoners. The transgender woman was eligible for open conditions in summer 2023. The decision was referred to Ministers at that time. The transgender woman’s open status was eventually confirmed in January 2024. We were informed by the Ministry of Justice that “*due to the relative infancy*

<sup>35</sup> Sentences of Imprisonment for Public Protection (IPPs) were created by the Criminal Justice Act 2003 and started to be used in April 2005. They were designed to protect the public from serious offenders whose crimes did not merit a life sentence.

<sup>36</sup> This was due to immigration staff being reallocated to the influx of IS91 cases being moved from prisons to immigration removal centres, again due to population pressure.

<sup>37</sup> Supporting marginalised migrant women.

*of this revised policy [...], it is difficult to set parameters for the expected turnaround times at this stage when Ministers are required to consider cases and take final decisions". This was a significant and inhumane delay in process (from August 2023 to January 2024) which caused unnecessary distress for the prisoner. We then monitored the same prisoner undergoing a frustratingly slow process to have the conditions of her ROTL approved locally in the prison. The prisoner commented to a member of the Board that "HMPPS don't understand what it does to a person, just waiting, waiting".*

- *Recalls.* There has been a significant increase in the number of recalled women in the prison (increased from 40 women at the end of last year's reporting period to 67 at the end of this period, with an increase of 50% also in the previous year). By way of an example of entrenched patterns of offending, we monitored one woman who had committed her first offence aged ten years and then had a further 110 convictions for 248 offences; she was recalled on almost every occasion she had been released on licence.
- *Friday releases.* As of the end of 2023, with new legislation<sup>38</sup> introduced, the majority of Friday releases were not permitted. The prison did not keep a log of women who were released on a Friday following this, but we were told that it was just a couple of women.
- *Early release.* We were not aware of any women released early on newly introduced end of custody supervised licence arrangements in response to population pressure.
- *Accommodation.* As previously reported, we continued to have frequent reports from women who were very close to their release dates and who had little visibility of their accommodation arrangements post release. Often, when we followed up, the offender management team were working diligently behind the scenes to line up accommodation, often in complex circumstances. However, the lack of information and last-minute nature of the process only served to increase women's anxiety levels.
- At the same time as we saw what might be construed as knee-jerk, short-term measures to deal with population pressure (7.2), we monitored the case of a woman who was transferred to Downview on recall for just 12 weeks. The recall was for a breach of a licence condition (failure to attend her probation appointment), which had taken place 20 years prior to her recall to Downview. The woman had not committed any further offences in that time and was now a mother, with school-age children and secure employment. She lost her job in the community whilst in Downview and was not allocated any work or other activities during her time in the prison. We query whether this is a sensible use of a prison place in the middle of acute population pressure, and also of HMPPS resources generally.

#### **7.4 Family engagement**

*Our monitoring experience is that many women undergo crises connected with contact with, or support for, their family and that waiting for access to appropriate family support can tend to exacerbate a range of related issues. Listeners (prisoners trained by the Samaritans to offer confidential emotional support to fellow prisoners)*

---

<sup>38</sup> <https://www.gov.uk/government/news/end-to-friday-prison-releases-calls-time-on-damaging-race-against-the-clock>

*at the prison continue to record that one of the main reasons for contact is family issues.*

- *Staffing.* The charity, Prison Advice and Care Trust (PACT), has the HMPPS contract for family engagement services at the prison. Consistency of PACT staffing has remained an issue, with all of the PACT staff being made redundant in September 2023 (described to a member of the Board by a Governor as: ‘...in true Pact fashion we have had mass staffing changes again’.<sup>39</sup>). However, by December 2023, two new members of staff were allocated to the provision of family engagement services for the prison, and a volunteer to cover a part-time paid staff role<sup>40</sup>. One of these two employees (the manager) did not carry a full caseload and for a period did not operate in the prison. The caseload of PACT was 52 in early May 2024 (of a population of about 325 women at the time, compared with a generally declining caseload of 93 women in April 2023 and 70 in January 2024). We saw a complaint submitted by a prisoner (which was upheld) that she had to wait seven weeks to get a PACT referral. The Board has concerns about whether or not the available PACT staff are managed effectively by prison staff, as there has been a lack of clarity at times surrounding the expectations of their delivery. Plans were discussed for a prisoner peer PACT champion for the wings in early Autumn 2023; as of the end of the reporting period, there was no one in place. We were told by PACT staff locally that more staff had joined towards the end of the reporting period. However, we have not been able to directly monitor this as at the end of our reporting period. We will continue to monitor the situation.
- *Contracting provision.* We are aware that the annual cost for the PACT contract at Downview is £115,000. The annual cost had, we were told by senior prison staff, been raised as a concern by the prison during the tender process for family engagement services.

*We have raised this issue repeatedly in previous annual reports. The requirement for family engagement services at the prison is significant. The Board’s view is that the PACT staffing levels have been inadequate for much of the reporting period and for some time prior to that<sup>41</sup> and that the contracted provision at Downview does not appear to represent an effective use of public funds.*

- *Social visits.* The area outside the visitors’ centre remained unkempt and the outside seating was removed as unsafe and then not replaced. On the various occasions we monitored, there was no PACT playworker in the play area in the visits’ hall (and this was confirmed by staff on a regular basis). Our monitoring of social visits demonstrated a positive and friendly reception by prison staff in the search process. We saw frequent examples of visitors being welcomed in a warm and professional way by prison staff. The private family room in the visits’ hall

---

<sup>39</sup> Minutes of a reducing reoffending meeting in August 2023 also stated, ‘PACT restructure going from a team of 5/6 down to 1 or 2 staff’.

<sup>40</sup> We were told directly by a member of PACT staff on 19 December 2023 that ‘PACT decided to restructure as they didn’t think that Downview needed so much resource’ and by senior prison staff that PACT ‘can utilise volunteers in place of salaried staff if they choose’. Concerns were raised by prison staff that volunteers were often students and, therefore, not available during term-time.

<sup>41</sup> Reducing Reoffending monthly meeting minutes from March 2023 regarding PACT stated: ‘Current staffing issues are impacting provisions that are on offer at Downview.’

(often used for sensitive meetings requiring more privacy, such as final pre-adoption meetings with children) was not available to women who were on the basic (lowest) level of the incentives scheme. It was reported by PACT in April 2024 that 186 women at HMP Downview (about half the population) do not receive social visits.

- *Family ties.* We often met women who had been moved to Downview from a prison that had been significantly closer to their family. One woman was initially located in HMP Peterborough. She had multiple disabled children, all based far away in the north of England. We were told that her husband had paid hundreds of pounds for a carer to help him bring their children to visit her at HMP Peterborough (for the first visit since she was sentenced). She was then transferred to Downview immediately prior to the visit taking place, so the visit was cancelled. Shortly afterwards, she was transferred from Downview to another prison. It is difficult to understand the thought processes that go on behind transfer decisions such as these. We also met an elderly couple who had a daughter previously at another prison (a journey of 40 minutes to make a social visit from their home) and who now faced a journey of 3.5 hours to Downview, with attendant unsustainable hotel and petrol costs. The scheme for financial support for prison visits is limited to people in receipt of certain benefits.
- Women allowed to visit their children on a childcare resettlement licence (available subject to eligibility at any time in their sentence) decreased from 12 instances in October 2023 to three in April 2024.

## The work of the IMB

### Board statistics

Recommended complement of Board members	12
Number of Board members at the start of the reporting period	12
Number of Board members at the end of the reporting period	10
Total number of visits to the establishment	331

### Applications to the IMB

*There was a 65% increase in applications to the Board from the previous year.*

Code	Subject	Previous reporting year	Current reporting year
A	Accommodation, including laundry, clothing and ablutions	15	20
B	Discipline, including adjudications, incentives scheme and sanctions	7	15
C	Equality	6	7
D	Purposeful activity, including education, work, training and time out of cell	9	19
E1	Letters, visits, telephones, public protection and restrictions	9	27
E2	Finance, including pay, private monies and spends	15	11
F	Food and kitchens	4	7
G	Health, including physical, mental and social care	35	59
H1	Property within the establishment	28	31
H2	Property during transfer or in another facility	19	47
H3	Canteen, facility list, catalogues	3	9
I	Sentence management, including home detention curfew (HDC), ROTL, parole, release dates and re-categorisation	24	44
J	Staff/prisoner concerns, including bullying	17	27
K	Transfers	5	1
L	Miscellaneous	4	7
	<b>Total number of applications</b>	<b>200</b>	<b>331</b>

## **Annex A**

### **Service providers**

- Works and maintenance at the prison are carried out by Gov Facility Services Limited (GSFL).
- Healthcare services are provided by Central and North West London NHS Foundation Trust (CNWL), with substance misuse support provided by Forward Trust and GP services provided by DrPA.
- Education facilities are provided by Milton Keynes College.
- A number of providers offer services and programmes (on a contracted or third sector basis) within HMP Downview, including CXK, the Shannon Trust, the Samaritans (Listener scheme), ID Essence, the Koestler Trust, Hibiscus, London College of Fashion, The Clink Kitchens, Max Spielmann, Prison Advice and Care Trust (PACT), Fine Cell Work, StoryBook Mums, the Shaw Trust, Making Connexions and Women in Prison and Advance.



This publication is licensed under the terms of the Open Government Licence v3.0 except where otherwise stated. To view this licence, visit [nationalarchives.gov.uk/doc/open-government-licence/version/3](https://nationalarchives.gov.uk/doc/open-government-licence/version/3)

Where we have identified any third party copyright information you will need to obtain permission from the copyright holders concerned.

This publication is available at <https://www.gov.uk/government/publications>

Any enquiries regarding this publication should be sent to us at [imb@justice.gov.uk](mailto:imb@justice.gov.uk).