



Ministry
of Justice

Lord Timpson
Minister of State for Justice

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

MoJ Ref: SUB135574

9 July 2026

Dear Chair,

**HMP HIGH DOWN INDEPENDENT MONITORING BOARD ANNUAL REPORT
FOR 1 JANUARY 2025 – 31 DECEMBER 2025**

Thank you for providing your Board's annual report on HMP High Down. I remain sincerely grateful to you and your colleagues for your continued dedication in producing your annual report despite operating with several vacancies. I noted that there was an increase in the number of Board members at the end of the reporting period and hope the position continues to improve.

I am very sorry to hear that eight prisoners died during the reporting year, seven in custody and one within 24 hours of transfer to another prison. I offer my condolences to all their friends and family and would like to reassure the Board that recommendations made by the Prisons and Probation Ombudsman are taken very seriously.

I had the opportunity to meet the Governor when I visited HMP High Down on 6 May 2025 and was able to discuss some of the themes in more detail whilst also setting out the Government's response to Jennifer Rademaker's Review into professional standards within HM Prison and Probation Service (HMPPS). As a result, a new Independent Review Resolution and Investigations Service was introduced in January 2026.

I recognise your continued concerns regarding mentally unwell prisoners being held in the Care, Separation and Reintegration Unit (CSRU). I can provide assurance that the healthcare provider, commissioned by NHS England, and prison staff have built strong relationships to implement an integrated approach to the planning and delivery of care within the CSRU, including mental health resources and interventions. It remains the case that the use of a CSRU long-term is not appropriate for a prisoner who is mentally unwell and access to other more appropriate secure settings are actively sought that can meet the individual's needs. The CSRU will also only be used as a last resort to maintain their safety and the safety of others and multidisciplinary oversight and support is put in place. In addition, further to last year's response, I can advise that the significant reforms of the Mental Health Act 2025 received Royal Assent in December 2025 and further details about implementing these reforms are set out in the annex.

Regarding your concerns about the probation workforce levels, please be assured that the recruitment and training of staff remain high priorities for the Probation Service to provide a workforce that can safely supervise and manage offenders in the community. Whilst there is more to do, staffing levels for Probation Service grades have increased by 21% between June 2021 and December 2025 and the 2025/26 trainee target was exceeded. There is a commitment to onboarding at least 1,300 further trainees during this financial year 2026/27 and work is underway locally at HMP High Down to progress to the

agreed probation resourcing allocation. The overall probation budget is also increasing by up to £700 million over the next three years to bolster community justice, which includes the probation service's resource and ability to tag offenders. Alongside this our Future Probation Service Programme is rebalancing demand and capacity by implementing measures that will reduce workloads through technology, efficiency and changing how we work. This will allow probation practitioners to provide closer oversight of offenders who pose the greatest risk, focusing more on engaging, motivating and supporting people to turn their lives around. In addition, the significant reforms contained in the Sentencing Act, which received Royal Assent on 22 January 2026 will provide the Courts with options to end the cycle of less serious offenders going in and out of prison. This will also help HMPPS to inform the future requirements for the prison estate to keep protecting the public and support reducing reoffending.

I do also appreciate your recurring concerns about the needs of an older prisoner population. We are aware of the increasing demand for appropriate healthcare for older prisoners, including chronic and acute health issues and that this proportion of the population is going to rise. NHS England is committed to ensuring that the healthcare provision for the population at HMP High Down is responsive to the changing needs of the different cohorts at the prison. Opportunities to increase access to relevant health provision continues to be sought via secondary care providers, such as specialist care teams in Hospitals via video appointments, as well as an ongoing review of the local provision on site. A Memorandum of Understanding is in place with the Local Authority and there is a proactive approach to resolving social care services provision. HMP High Down has a dedicated senior leader to provide oversight for older prisoners and arrangements are in place for appropriate out-of-hours social care provision to be delivered at the prison where required in line with the Local Authorities statutory obligation. In addition, the HMPPS Older Prisoners Strategy mentioned in my previous response aims to be published later this year, and will examine how the prison estate, regimes, and health and social care arrangements can better meet the needs of this cohort. The work includes engagement with NHS England, local authorities and third-sector partners to consider how provision can be strengthened and delivered more consistently across the estate, including through improved coordination and continuity of care.

I am mindful that a couple of concerns that have been highlighted in the report have been reiterated and I hope this letter provides reassurance that we are committed to tackling these issues. Whilst drugs continue to present challenges in our prisons I welcome the Board recognising the significant development of a recovery unit being introduced at the prison. It was reassuring to note that incidents of self-harm have reduced significantly and that assaults continue to be on a downward trend. I was also encouraged to read about the improvements in education attendance and the positive comments prisoners made about the increased number of key work sessions.

I note you have raised some 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 Deputy Prime Minister and I really value the scrutiny brought by members of Independent Monitoring Boards to improve the prison estate and we extend our thanks for your continued dedication on behalf of HMP High Down.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'James', written in a cursive style.

Lord Timpson
Minister for Prisons, Probation, and Reducing Reoffending

HMP HIGH DOWN: INDEPENDENT MONITORING BOARD ANNUAL REPORT FOR 1 JANUARY 2025 – 31 DECEMBER 2025

HMPPS and NHS England comments on matters raised in the report

Late Arrivals

It is acknowledged that various issues can have an impact on the journey from court or to and from custody. However, an enhanced reporting framework is now utilised to capture Prisoner Escort and Custody Service (PECS) performance data, which is shared with all Governing Governors and Prison Group Director offices to support monitoring and informed decision-making. Its introduction has been positively received across the prison enabling HMPPS and PECS to more effectively identify, manage, and respond to issues. Where necessary this enables HMP High Down to escalate any concerns. In addition, an inter-prison transfer efficiency review has now been completed and implementation is being taken forward collaboratively by various national teams in HMPPS involved in the transfer process.

Unsuitable Security Category

The correct category for a prisoner is informed by a robust risk assessment undertaken by staff who are experts in offender behaviour and psychology to ensure that the full range of risk factors are considered. This includes considering that an individual may present as compliant within custody while still presenting an elevated risk level. The offence committed and any offending history will also be considered in the assessment. The purpose of the security categorisation process is to assign prisoners to the lowest security category appropriate to managing their risks and it is worth noting that category C prisons provide a level of physical and procedural security capable of safely and securely managing the majority of male prisoners in the estate and this is where most male prisoners are held. A categorisation assessment decision to a lower category will only be made if the collective risk of the prisoner is deemed safe to be able to be managed in the lower security conditions. A prisoner's security category will not be adjusted to achieve a better match with the available spaces within the estate.

Mental Health Transfers

The Mental Health Act 2025 introduces a new statutory time limit of 28-days for the transfer of patients with a mental disorder from prison and other places of detention to hospital. This reform is due to commence by December 2027 and the newly established Mental Health and Justice Strategic Advisory Group will have oversight to assure the 28-day transfer process. NHS England remains fully committed to improving the timeliness of transfers and is actively engaged in an ongoing national and regional programmes aimed at strengthening pathways, reducing delays, and supporting consistent progress towards achieving the statutory time limit. Within the NHS England south east region scoping work has been completed to ensure that there is clinical leadership throughout the pathway from and to prison and a mental health hospital. HMP High Down is also continuing to work closely with the on-site mental health team to ensure appropriate care is provided to individuals suffering acute mental health problems to keep them safe prior to an appropriate transfer taking place.

Healthcare Complaints

The Board can be assured that the healthcare provider at HMP High Down treats complaints by patients with the appropriate level of seriousness and there is a policy in place to ensure that health related complaints are responded to in a timely way. It is recognised that on occasions, the nature of the complaint requires significant on-site investigation and this can impact the length of the response time. The health provider will be introducing a complaints update process to ensure that patients are notified of any delays which follows the successful implementation of a similar approach at HMP Aylesbury recently.