



HM Prison &
Probation Service

HMP High Down

A response to the HMIP inspection: 1 June to 11 June 2026

HMIP report published: 7 September 2026

Submitted: 22 September 2026

Introduction

HM Inspectorate of Prisons (HMIP) and HM Inspectorate of Probation (HMIP) for England and Wales are independent inspectorates which provide scrutiny of the conditions for, and treatment of prisoners and offenders.

They report their findings for prisons, young offender institutions, and effectiveness of the work of probation, and youth offending services across England and Wales to Ministry of Justice (MoJ) and His Majesty's Prison and Probation Service (HMPPS).

In response to the report HMPPS / MoJ are required to draft a robust and timely action plan to address the priority and key concerns.

Action plans provide specific steps and actions to address these concerns, that are clear, outcome focussed, measurable, achievable, with clear accountability and appropriate timescales for completion.

Action plans are sent to the respective HMIP and published on the GOV.UK website. Progress will be monitored regularly through local, regional, and national governance structures.

Priority concerns and actions

No.	Concerns	Response: action taken / planned	Responsible owner	Target date
1	Living conditions on some houseblocks were not good enough. Many cells were dirty, toilets and sinks required deep cleaning, and few cells had curtains.	A programme of work has been implemented to improve living conditions across all residential units. This includes undertaking comprehensive deep cleaning of cells, with particular focus on toilets, sinks and other sanitary facilities. Regular quality assurance checks and Accommodation Fabric Checks (AFCs) are being completed to identify and rectify cleanliness and decency issues promptly. Curtains are being replaced or installed where required to improve privacy and meet national decency standards. Residential managers will monitor compliance through routine decency inspections, with remedial works tracked and reviewed at senior management meetings to ensure sustained improvement in living conditions. Requirements relating to cell cleanliness, privacy screening and deep-cleaning schedules will be readily available across residential units.	Governor	January 2027
2	The availability of illicit substances remained the biggest threat to the stability of the prison.	A refreshed Drug Strategy will be implemented through a whole-prison approach focused on restricting supply, reducing demand and supporting recovery.	Governor	March 2027
	As above	Security teams will continue to target drug trafficking and the illicit economy through enhanced intelligence gathering, our extensive mandatory drug testing programme, intelligence-led searches, and conduct disruption activity for those involved in conveyance. HMP High Down will continue to work closely with security partners, in particular with the Police, to detect and deter conveyance.	Governor	March 2027

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No.	Concerns	Response: action taken / planned	Responsible owner	Target date
	As above	The prison will strengthen partnership working between Security, Healthcare and substance misuse services to identify emerging trends, support those affected by substance misuse, and promote recovery pathways. The Incentivised Substance Free Living (ISFL) provision will continue to be developed, with increased opportunities for prisoners to engage in recovery-focused interventions and support. We will conduct a review of our New Psychoactive Substance Recovery Unit (NPSRU) to ensure it remains fit for purpose.	Governor	March 2027
	As above	Progress will be monitored through Monthly drug strategy governance meetings, analysis of intelligence, mandatory drug testing results and levels of prisoners found under the influence.	Governor	March 2027
3	Too many prisoners were locked up during the core day if they were not participating in activities. Delays and inconsistency in the regime resulted in some being locked up too early and unlocked late.	The prison will increase prisoners' access to purposeful activity and reduce unnecessary time locked in cell by maximising the use of available work, education and enrichment places and continuing to develop the enrichment activity offer.	Governor Head of Education Skills & Work	March /2027
	As above	Regime delivery will be strengthened through improved planning, monitoring and staff accountability to ensure that published unlock and lock-up times are delivered consistently.	Governor	March 2027
	As above	Managers will undertake regular assurance checks on regime delivery, identify and address delays promptly, and review attendance and activity	Governor	March 2027

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		participation to maximise time out of cell. Progress will be monitored through weekly regime management meetings, attendance data and prisoner feedback to ensure prisoners have access to a predictable and purposeful daily regime.		
4	Prisoners' attendance at education, skills and work was too low.	Attendance, unlock performance, allocations, waiting lists and activity space utilisation will be closely monitored through the Senior Leadership Team (SLT), the Quality Improvement Group (QIG) and the Employment and Allocations Board.	Head of Education Skills & Work	March 2027
	As above	A review of enrichment activity provision and competing regime demands will be undertaken to identify and reduce factors contributing to non-attendance. Daily attendance, unlock and non-attendance data will be scrutinised, with attendance performance shared at morning meetings and monitored against a target of 90% attendance and unlock.	Head of Education Skills & Work	March 2027
	As above	Robust arrangements will be implemented to identify, challenge and support prisoners who do not engage with purposeful activity. Residential staff will provide daily feedback on non-attendance, incentives schemes will be used to encourage re-engagement, and prisoners who continue to disengage will be referred to the Reintegration Group for further intervention.	Head of Education Skills & Work	March 2027
	As above	Allocation processes will be strengthened to minimise waiting times and maximise activity participation. Vacancies will be reviewed weekly, by the activity's hub.	Head of Education Skills & Work	March 2027

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5	Teaching staff did not routinely provide prisoners with recorded feedback on their progress, which limited opportunities to reflect on and build on previous learning.	HMP High Down will implement a structured learner feedback strategy to ensure prisoners receive timely, meaningful written feedback that supports reflection, progression and achievement. All education, industries and work area staff will receive training on the standards and expectations for providing high-quality written feedback to learners.	Head of Education Skills & Work	March 2027
	As above	Quality assurance processes will be strengthened through regular learning walks, teaching observations and deep dives across all education and work areas. These reviews will assess the consistency and quality of feedback provided to learners, with targeted coaching and support offered to staff where improvements are required.	Head of Education Skills & Work	March 2027
	As above	A feedback framework will be introduced across education, vocational training and prison industries to ensure learners clearly understand their progress, strengths, areas for development and next steps. This approach will support prisoners to build on previous learning and progress through education, training and employment pathways.	Head of Education Skills & Work	March 2027
	As above	Compliance and quality will be monitored through six-weekly reviews, learner voice activities and management oversight to ensure feedback is meaningful, recorded consistently and used to inform future learning. Success will be measured through 100% of learners receiving written feedback and increased evidence that learners understand their progress and next steps, resulting in improved engagement, achievement and progression outcomes.	Head of Education Skills & Work	March 2027

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6	Offender management unit staffing shortages had a significant impact on outcomes for prisoners. High caseloads led to delays in key processes such as recategorisation and OASYs assessments (see Glossary).	Substantive recruitment to Probation Service Officer (PSO) posts is ongoing. Senior leaders will continue to closely monitor recruitment pipelines and workforce forecasts to minimise the impact of any delays on operational delivery and sentence management activity. In the interim, local managers have been encouraged to utilise agency staff to provide temporary cover for staffing gaps. Demand management arrangements have also been agreed to ensure that work with higher-risk cases is prioritised, and statutory responsibilities continue to be met.	Regional Probation Director, London.	Ongoing
	As above	Alongside recruitment activity, the Heads of Offender Management Departments (HoMDs) will remain focused on staff retention, wellbeing and capability development to ensure that any new staff are effectively supported into post and existing staff are equipped to manage increasingly complex caseloads. This includes ongoing management oversight, professional development and targeted support to maintain service delivery while recruitment activity progresses.	Regional Probation Director – London.	Ongoing
7	Limited contact with prison offender managers (POMs) caused prisoners considerable frustration. Leaders had taken some steps to mitigate the impact; however, the level and quality of engagement did not adequately support sentence progression and effective case management.	A revised offender management model was introduced on 1 June 2026 to strengthen sentence management support. Under the new arrangements, all newly received prisoners receive an in-person meeting with their Prison Offender Manager (POM) within their first two weeks at HMP High Down. POMs will then meet with prisoners on a further two occasions during their first 12 weeks in custody, ensuring early engagement and effective sentence planning.	Governor	Completed
	As above	To support continuity of care and communication, the prisoner's Key Worker will attend the third meeting where possible, enabling a structured handover	Governor	Completed

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		of key issues and actions. Where attendance is not possible, a separate meeting will take place between the POM and Key Worker to ensure relevant information is shared. Following this transition, the Key Worker becomes the primary point of contact for day-to-day sentence progression concerns, while POMs continue to provide direct support at key milestones such as parole reviews, recategorisation reviews and other significant sentence events.		
	As above	Offender Management Unit (OMU) surgeries are being reviewed and strengthened to ensure they are consistent, structured and well-advertised across the establishment. A dedicated OMU liaison officer is available on each residential unit every week to provide advice and support and to address prisoner queries relating to sentence management and progression. These measures are intended to improve accessibility, communication, and prisoner confidence in offender management processes.	Governor	December 2026

Key concerns and actions

No.	Concerns	Response: action taken / planned	Responsible owner	Target date
8	There was very limited consultation with prisoners from different groups.	A comprehensive equality consultation framework will be implemented to strengthen engagement with prisoners from all protected characteristic groups. Newly appointed Prison Leads and Deputy Leads will take an active role in consulting with their designated groups through regular forums, focus groups and surveys, ensuring prisoners have opportunities to raise concerns, share feedback and influence service delivery. Outcomes and actions arising from consultation will be monitored through the monthly Diversity and inclusion meeting to ensure feedback is considered, acted upon and communicated effectively.	Governor	March 2027
9	Leaders did not use data effectively to understand and address the underlying drivers of violence and self-harm.	HMP High Down will strengthen the prison's analytical approach to violence and self-harm by introducing a comprehensive safety performance framework that brings together data from incident reports, ACCT reviews, CSIP investigations, intelligence reporting, prisoner consultation, healthcare information and safety assurance processes. Regular multidisciplinary reviews at Safety meetings will identify trends, hotspots, repeat victims and perpetrators, and the underlying drivers of violence and self-harm, enabling targeted interventions and more effective resource deployment. Findings will be monitored through the monthly Safety Strategy governance meetings and used to inform preventative actions, policy development and staff training.	Governor	January 2027
10	Teaching staff did not develop prisoners' understanding of British Values sufficiently well.	The prison will work with education providers to strengthen the promotion and understanding of Fundamental British Values across all education, skills and work activities. Staff will receive guidance and development to ensure British Values are embedded within lesson planning, teaching, discussions and learning materials, enabling prisoners to understand how these principles	Head of Education Skills & Work	March 2027

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		apply within custody and in the community. Quality assurance and lesson observation processes will be used to monitor delivery, while learner feedback and curriculum reviews will assess understanding and impact.		
11	The high number of complaints was not analysed sufficiently well by leaders. They did not identify the issues most frequently raised by prisoners or take sufficient action to address them.	Current complaint analysis processes will be enhanced to place greater emphasis on identifying recurring themes, emerging trends and areas of concern raised by prisoners to drive service improvements. Detailed analysis will be undertaken to better understand the root causes of complaints, with findings reviewed and discussed at monthly Senior Leadership Team meetings.	Governor	March 2027
12	Oversight of health care complaints and applications was not adequate and posed risks. Health records also lacked key information, including about psychosocial care, applications, triage decisions and do not attempt resuscitation records.	Complaint boxes are emptied by the administration team each weekday to ensure the confidential and timely collection of complaints. Any damaged boxes have been replaced with secure, clearly designated alternatives across all residential units. The complaints pathway has been reviewed and reinforced, all complaints are triaged by the Primary Care Lead, Mental Health Lead, or Head of Healthcare and allocated to the appropriate individual for investigation and response.	Head of Healthcare	Completed
	As above	The administration team monitor complaint deadlines and follow up with allocated responders to support timely completion of responses. Bi-weekly complaints governance meeting held. All outstanding concerns/complaints reviewed and actioned. Themes and trends reviewed as well as sampling of responses to review quality.	Head of Healthcare	Completed
	As above	Additional communications have been issued on how to make complaint. Improvements will be informed by patient feedback.	Head of Healthcare	Complete and ongoing.

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No.	Concerns	Response: action taken / planned	Responsible owner	Target date
	As above	Enhanced oversight of complaints performance introduced as part of governance framework, ensuring regular reporting at the Care Quality Meeting (CQM) and Partnership Board oversight, quarterly audits, and biweekly assurance meeting. Progress will be monitored through governance processes, audits, patient feedback, and performance reporting, with targets of 100% complaint acknowledgement and 95% response compliance.	Head of Healthcare	January 2027
	As above	All patients with a Do Not Attempt Cardiopulmonary Resuscitation (DNACPR) document have been reviewed and copy available in electronic medical record, with ongoing oversight embedded as part of the partnership board agenda.	Head of Healthcare	Completed
	As above	Application of the Local Operating Procedure (LOP) to be reviewed by clinical team leads to ensure a standardised approach to application requests and triage using SystmOne template. This will be complimented by a quarterly audit of the application template and clinical waiting lists.	Head of Healthcare	September 2026
	As above	Longer-term digital solutions are being developed using the prisons local kiosk system to support the receipt, tracking and audit of patient applications. This is recognised as a more complex system change requiring joint development and governance and will be progressed as part of ongoing service improvement to strengthen oversight, timeliness and consistency. Progress against implementation will be monitored through the Health Delivery Action Plan overseen by the directorate SLT.	Head of Healthcare	October 2026

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13	For at least three years, nursing staff had routinely poured and labelled individual doses of methadone before transporting them to other wings, which was not in line with professional nursing standards.	A robust and thorough review of current practice will be conducted that will involve NHSE, HMPPS on site and the providers of substance misuse treatment alongside the lead provider of healthcare, CNWL. The review will include: - An assessment of the onsite arrangements for the distribution of methadone to dispersed Opioid Substitution Treatment (OST) patients (approx. 20). - An assessment of current dispersed patients on OST suitability to alternative medication, for example, Burprenorphine and Buvidal. - An assessment of the potential to manage movement of the dispersed population members to one medication hatch. Following the joint review, options for resolution will be agreed by key partners with an action plan put in place.	NHSE Health and Justice SE	November 2026
14	The library was under-resourced for the size of the prison. The room was too small, seating was limited with some broken furniture, and there were not enough materials to meet population needs.	HMP High Down will review and enhance the library provision to ensure it better meets the needs of the prison population. A library improvement plan will be developed to address accommodation, furniture and resource requirements, including the replacement of damaged furniture, increasing available seating where possible, and reviewing stock levels to ensure a broad and relevant range of reading and learning materials. Prisoner feedback and library usage data will be used to inform future developments and ensure the service supports literacy, learning and rehabilitation outcomes.	Head of Education, skills & work	March 2027
15	Progression opportunities remained too limited. Waiting lists for interventions were long	The prison will continue to apply national prioritisation principles to ensure programme places are allocated according to risk, sentence progression needs and key sentence milestones, including tariff expiry, Parole Eligibility Dates and release dates. Programme demand and waiting lists will be	Governor	March 2027.

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	and referral processes were often delayed.	regularly reviewed to identify prisoners who may benefit from transfer to establishments where suitable interventions can be accessed more quickly.		
	As above	Referral processes will be reinforced through closer collaboration between the Offender Management Unit, Prison Offender Managers and Programme teams to ensure referrals are completed in a timely manner, and sentence plans are reviewed regularly to maintain a clear focus on progression objectives.	Governor	March 2027