



HM Prison &  
Probation Service

Action Plan: HMP High Down

Action Plan Submitted: 8<sup>th</sup> December 2023.

A Response to the HMIP Inspection: 31<sup>st</sup> July – 17<sup>th</sup> August 2023.

Report Published: 13<sup>th</sup> November 2023.

## INTRODUCTION

HM Inspectorate of Prisons (HMIP) and HM Inspectorate of Probation 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 the priority and key concerns, that are clear, outcome focussed, measurable, achievable, and relevant with the owner and timescale of each step clearly identified. Action plans are sent to HMIP and published on the GOV.UK website. Progress against the implementation and delivery of the action plans will also be monitored and reported on.



ACTION PLAN: HMIP REPORT

ESTABLISHMENT: HMP HIGH DOWN

1. Rec No	2. Concerns	3. Response Action Taken/Planned	4. Responsible Owner	5. Target Date
	<b>Priority concerns</b>			
1	<p><b>Too many acutely mentally unwell prisoners were held in the segregation unit.</b> Transfers to a prison with a health care inpatient unit did not always take place quickly enough because of the lack of available spaces, and waiting times to be accepted by a secure mental health hospital in the community were too long.</p>	<p>Working closely with our health and justice partners, the Ministry of Justice will continue to drive forward work to introduce a non-statutory independent role designed to improve oversight and monitor delivery of the 28-day time limit set out in NHS England’s good practice guidance. This action will require the support of MoJ Offender Health Policy team.</p> <p>HMP High Down are piloting a national clinical template for mental health transfers from the adult secure estate which was developed to promote clinical best practice, ensure accurate and consistent recording within the clinical IT system and provide more robust assurance around mental health transfers across the secure estate. This template is intended to be used to record the referral, assessment and transfer process of prisoners and detainees with mental illness, learning disability and autism who do or may require care within inpatient mental health, learning disability and/or autism (MHLDA) treatment under the Mental Health Act (MHA) 1983. NHS England Health &amp; Justice Southeast. This action will require support and input from NHS England Health &amp; Justice team (Southeast)</p> <p>Mental health transfers are monitored locally via the weekly Transfer Review Meeting and cases are escalated to the Prison Group Director’s office as necessary.</p>	<p>The Governor / Head of Healthcare</p> <p>The Governor / Head of Healthcare</p> <p>The Governor</p>	<p>2024/2025</p> <p>April 2024</p> <p>Ongoing</p>



		A clear escalation process will be developed for London Prison Group to consider prisoners who need to be transferred to a prison with a health care inpatient unit. This action will sit with the London Regional Health and Wellbeing Lead and the Prison Group Director and will be completed in consultation with the Governor.	London Prison Group Director / The Governor	March 2024
2	<b>The availability and use of illicit drugs posed a threat to the stability of the prison, contributing to debt, bullying and fear.</b> High Down had amongst the highest positive drug testing rate of all adult male prisons in England and Wales.	<p>HMP High Down will be collaborating closely with partner agencies and PGD office to tackle the illicit items including any additional support, resources, funding etc that may be needed. This will require the support of the PGD, SOCT and Surrey Police colleagues.</p> <p>HMP High Down will be reviewing and identifying any areas of weakness in physical, procedural &amp; dynamic security. To mitigate these risks, they will take the appropriate measures which may require additional funding. This work will be overseen by the Head of Security and discussed at the monthly security meeting. As above, this will require the support of the PGD, SOCT and Surrey police colleagues.</p> <p>HMP High Down have identified one of the conveyance methods. Work has commenced with national teams to try to address this issue. Furthermore, the prison will develop more sophisticated security interventions such as proactive intelligence work with Law Enforcement colleagues to enhance intelligence outcomes.</p> <p>HMP High Down has appointed a Drug Strategy Lead, who will work with other departments within the prison as well as strategic partners such as Security, Order and Counter Terrorism (SOCT) and the Police.</p> <p>The Drug Strategy Lead will review the drug strategy and provide a more co-ordinated approach to reduce the ingress of illicit substances. They will work closely with the PGD Safety Team who will co-review our strategy and can share best practice. A monthly Drug Strategy meeting will be held to discuss Restricting Supply, Reducing Demand and Building Recovery, with a regularly reviewed action plan. The monthly meeting will have clear terms of reference, identifying</p>	<p>The Governor</p> <p>The Governor</p> <p>The Governor</p> <p>The Governor</p> <p>The Governor</p>	<p>July 2024</p> <p>June 2024</p> <p>April 2024</p> <p>June 2024</p> <p>October 2024</p>



		<p>appropriate attendees to support an effective multidisciplinary approach.</p> <p>High Down's Debt Strategy is being reviewed by the Safety Team with support from the regional safety team. And will be embedded once the new Drug Strategy lead is in post. Solutions affecting this will be enhanced by pathway work with the Forward Trust including maintenance and abstinence-based solutions. This will include segmentation of some of our accommodation including the Incentivised Substance Free Living unit (IFSL) and Houseblock 4</p> <p>More comprehensive Substance Misuse Service health promotion work will be championed across departments and the induction programme will be revised to set out firm expectations for those coming into custody here. Suspicion and voluntary drug testing will be enhanced, and compacts will be revised to be more robust and effective this will be discussed at the monthly Drug Strategy/Security meeting which is co-chaired by the Head of Security and the Head of Drug Strategy. The prison will use a range of data to track progress.</p>	<p>The Governor / CNWL</p> <p>The Governor</p>	<p>April 2024</p> <p>Ongoing</p>
3	<b>Violence had increased and many prisoners felt unsafe.</b>	<p>HMP High Down will review the Population Management Strategy. The prison will also work with other Cat C prisons to identify areas of good practice in tackling gang violence, which can then be implemented at HMP High Down.</p> <p>HMP High Down will use this data to help identify patterns, trends, and the sources of violence within the local establishment picture. This will enable informed decisions on the safest ways to manage violence with an aim to reduce it.</p> <p>The prison will also complete a review of the Population Management, to consider implementing a unit where prisoners would be moving away from gang segmentation to a violence free unit.</p>	<p>The Governor</p> <p>The Governor</p> <p>The Governor</p>	<p>April 2024</p> <p>April 2024</p> <p>October 2024</p>



		<p>The Safety team will work collaboratively with Security and the Residential teams to take a proactive approach with those prisoners that have been found with weapons but not yet committed an act of violence to understand why they are in possession of a weapon and consider CSIP arrangements. The Head of Safety will analyse the data to measure the impact on violence through the monthly safety meeting. A new crime-in-prison coordinator post has been funded for 12 months to improve police referrals and will look out for offence mirroring behaviour to seek outside charges for those who continue to engage in violence or weapon related offending.</p>	The Governor	March 2024
		<p>HMP High Down will develop and implement a questionnaire, which is being designed by the Violence Reduction (VR) &amp; Violence Reduction Integration Team (VRIT) teams. With discussions around how to engage responses prior to implementation. The questionnaire will cover main topics such as violence, gangs, debt, and victim support. Responses will be collated and analysed forming part of VR action plan. Once launched this would be repeated quarterly and discussed at the monthly Safety meeting which occurs on the third week of each month.</p>	The Governor	February 2024
		<p>HMP High Down will review and enhanced our Violence Reduction strategy. It will encompass all factors leading to violent behaviour, including the needs of prisoners, how the prison will meet these needs and how it will work to reduce violence. Consultations with both staff and prisoners will be conducted.</p>	The Governor	May 2024
		<p>The prison has reviewed the Challenge Support Intervention Plan (CSIP) referral criteria to lower the threshold to reflect our recategorisation to Cat C.</p>	The Governor	Complete



4	<p><b>High Down was not achieving its potential as a category C training and resettlement prison.</b>  Leaders did not provide sufficient purposeful activities and attendance was very low. Prisoners struggled to achieve their sentence plan targets because of the lack of places on offending behaviour programmes, little regular contact with prisoner offender managers and insufficient key work.</p>	<p>HMP High Down has been selected as one of the 5 Prisons nationally to be part of the new Prison Education Services Pilot scheme to locally commission education services from April 2025. This will give scope for a more bespoke offer and forensically focus on needs and output for our population.</p> <p>HMP High Down will be working closely with HMP Academies, Industries Retail, Catering &amp; PE, and other employers to open new workshops, however, this will be dependent on funding and resources being available.</p> <p>If HMP High Down were unsuccessful with national HMP Academies Bids, then we plan to develop academies locally using local businesses and community contacts.</p> <p>The prison and the education provider will review the Annual Delivery Plan (ADP) to ensure it meets the needs of the population.</p> <p>HMP High Down will scrutinise our current offer to streamline the current services to ensure they are fit for purpose in line with HMP High Down's vision. The Head of Education, Skills and Work will lead on this work and progress will be monitored during the monthly Senior Leadership Team (SLT) meeting.</p> <p>HMP High Down have appointed a new Head of Education, Skills and Work who will review delivery this will see the development of pathways options and new provision. Working collaboratively with the Head of Reducing Reoffending and Head of Residential Services, the prison will ensure that those in our care have access to services that will aid progression and reduce the likelihood of reoffending.</p> <p>HMP High Down will improve the current allocation to activities processes in consultation with Information, Advice and Guidance</p>	<p>The Governor</p> <p>The Governor</p> <p>The Governor</p> <p>The Governor / Novus</p> <p>The Governor</p> <p>The Governor</p> <p>The Governor</p>	<p>April 2025</p> <p>October 2024</p> <p>October 2024</p> <p>March 2024</p> <p>March 2024</p> <p>April 2024</p> <p>June 2024</p>
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		<p>(IAG)and Offender Management Unit (OMU) colleagues to ensure each learner is allocated appropriately. This will form part of the induction review.</p> <p>Following the inspection HMP High Down undertook a prisoner survey which has given us an insight into the more popular choices of activities and courses. Focus groups will be arranged by the Head of Education, Skills and Work, to build on these results. We will utilise this data to inform new projects.</p> <p>An establishment needs analysis will be completed by the Head of Reducing Re-offending to allow us to understand the needs of our cat C population.</p> <p>Workshop functions and accommodation spaces are being reviewed by a member of the SLT to ensure spaces are maximised. Funding may be required to enable spaces to become functional.</p> <p>HMP High Down will work collaboratively with the Reducing Re-offending Deputy Director (RRDD) and the Area Executive Director (AED) office to gain access to the allocation tool software.</p> <p>The prison will introduce bite sized functional skills learning being delivered on the houseblocks. This will further strengthen relationships between learners and tutors with the aim that this will then encourage them to attend educational classes.</p> <p>Following the inspection, HMP High Down is taking a robust approach to tackling poor attendance. All behaviour management policies are under review by SLT. Results of which will be communicated to staff and widely to prisoner cohorts. This is with a view to encouraging attendance at work, education, and activities as well as appropriate sanctions being in place if individual attendance is persistently poor. The link to sentence planning will be strengthened and will be actively encouraged by POM's, COM's, and keyworkers.</p>	<p>The Governor</p> <p>The Governor</p> <p>The Governor</p> <p>The Governor</p> <p>The Governor</p> <p>The Governor</p>	<p>June 2024</p> <p>October 2024</p> <p>March 2024</p> <p>March 2024</p> <p>February 2024</p> <p>April 2024</p>
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		<p>HMP High Down are currently carrying out a new profile and a new core day review, which will have a strong focus on Purposeful Activities and the development of non-accredited, credible courses (Tier 2) activities to increase attendance.</p>	The Governor	October 2024
		<p>Non-accredited, credible courses will form part of our Tier 2 Enhanced Enrichment Activities offer. HMP High Down will develop and co-ordinate these activities in line with prisoners' interests and personal, social, development needs. POMS will be fully aware of the Tier 2 offer and embed it within the individuals sentence plan to develop prisoners' awareness &amp; engagement, encouraging all prisoners to engage with these sessions. Prisoners' consultation process will be applied to introduce new activities that are staff, partnership, and peer led.</p>	The Governor	April 2024
		<p>The prisoner pay budget has not been increased or reviewed in line with inflation or becoming a Cat C establishment and we would require wider help from HMPPS to enable real change with the pay structure. This forms an important part of incentivising work, education and activities and ensuring that effort and input is rewarded and valued. It is an integral part of the jigsaw in terms of making the jail a truly working prison and encouraging behaviour change for those that reside here. The PGD has asked for a review, and we will present our case on the need for more resources.</p>	The Governor	February 2024
		<p>An Offending Behaviour Programme (OBP) needs analysis highlighted that additional programmes were required; however, this cannot be fully implemented at this time due to sufficient funding not being available.</p>	The Governor	June 2024
		<p>HMP High Down has been able to secure some funding that will allow us to deliver 16 places on New Me Strengths (8 general population places &amp; 8 from the People Convicted of Sexual Offences population), this is the adapted moderate intensity programme for prisoners with learning difficulties/challenges and 20 places on Horizon which is an intervention delivered to men who have a sexual conviction.</p>	The Governor	September 2024



		<p>Recruitment, mobilisation, and training will take place over the next 6 months with the first additional course due to take place from June 2024.</p> <p>Recruiting Probation Officers continues to be a challenge, which has resulted in caseloads being higher than other comparator prisons. The prison will continue to ensure that POMs meet prisoners in their first three months and last 3 months. Where prisoners are transferring in from other prisons HMP High Down will seek to improve communications with the POMs to ensure contact is established.”</p> <p>Active use of the Case Management Support (CMS) model funded by London Probation to support Probation Officers and wider OMU working which includes co-working cases and increasing face-to-face contact for indeterminate prisoners. We will continue to prioritise critical tasks including start-custody OASys, MAPPA contributions, parole, release and safeguarding planning, public protection and recategorization.</p> <p>Although keywork is a priority for the establishment, we are applying the national Regime Management Plan and ensuring that it is not a priority over delivery of a sustainable safe, decent, secure regime. As a result of our non-effective rate, we routinely sit within an amber-red operating state and, in line with national policy, must reduce keywork to protect other aspects of the regime. We have robust governance in place to ensure we are minimising our non-effective time and enhanced attendance management process to further support line managers.</p> <p>A new weekly report on keywork sessions is being shared with SLT. New quality assurance processes and regular training sessions have been introduced to improve the quality of the keywork that we are able to deliver.</p>	<p>The Governor</p> <p>The Governor</p> <p>The Governor</p> <p>The Governor</p>	<p>Ongoing</p> <p>Ongoing</p> <p>Ongoing</p> <p>Complete</p>
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	Key concerns			
5	Prisoners had few incentives to behave well, and their poor behaviour did not always receive a robust response.	<p>HMP High Down will undertake a review of the policies which enable us to encourage positive behaviour. This will include the VR and Safety strategy, IEP, Offensive materials, Decency, Work &amp; activities induction processes and Adjudication tariffs.</p> <p>The local incentives policy framework is currently under review led by the Head of Residence &amp; Services and will be seeking input from all key stakeholders as well as consulting with prisoners.</p> <p>The current enabling environments which include the Incentivised substance free living unit and the Community Living unit will be formally recognised as incentives within the policy.</p> <p>HMP High Down will endeavour to create further enabling environments such as a violence free wing.</p> <p>The Offender Personality Disorder unit (OPD) will further assist in encouraging positive behaviour and will take individuals from April 2024.</p> <p>HMP High Down are continually seeking feedback from our elected Prisoner Council. The Prisoner Council has been tasked with reviewing the local facilities list, taking into consideration our role as a Cat C establishment.</p> <p>Nearly 50% of Prison Officers at HMP High Down have less than 3 years' experience we will use our People plan to support improvements to staff capability. The New Colleague mentors will deliver one to one and coaching support. A training session entitled Confidence to Challenge will be delivered during the monthly shutdown training, prioritising our new prison officers. This will be monitored by</p>	<p>The Governor</p> <p>The Governor</p> <p>The Governor</p> <p>The Governor</p> <p>The Governor</p> <p>The Governor</p> <p>The Governor</p>	<p>June 2024</p> <p>June 2024</p> <p>June 2024</p> <p>October 2024</p> <p>April 2024</p> <p>March 2024</p> <p>March 2024</p>



		the Head of Business Assurance and discussed at the monthly SLT meeting		
6	Recorded levels of self-harm were high and too few prisoners on an assessment, care in custody and teamwork case management document felt well cared for.	<p>The Head of Safety is reviewing our use of the Single Point of Contact (SPOC) Assessment, Care in Custody &amp; Teamwork (ACCT) management to ensure its consistency and accuracy of documents as well as ensuring the prison are achieving identified needs for the individual which should improve prisoner perception of being cared for.</p> <p>Since the inspection, there has been a 14% reduction in self-harm incidents. The Safety Custodial Manager began work to review each ACCT that is opened to understand the reasons, to identify any emerging themes or patterns that would allow the prison to take additional preventative measures. The findings of each of the ACCT reviews are discussed at the weekly Safety Assurance Meeting (SAM) meeting, which is a multidisciplinary meeting attended by a range of staff, learning is implemented accordingly.</p> <p>To better understand prisoners' perceptions around safety, the Safety team will develop a survey to be shared with prisoners to gather their views. Following analysis this will allow us to develop a strategy and an action plan which we will monitor within the monthly Safety meeting which is chaired by the Head of Safety.</p>	<p>The Governor</p> <p>The Governor</p> <p>The Governor</p>	<p>March 2024</p> <p>March 2024</p> <p>April 2024</p>
7	Risks associated with poor medicine supervision and low rates of attendance at health care appointments persisted.	<p>HMP High Down have added poor medicine supervision and low rates of attendance at healthcare appointments to the Health Delivery Action Plan, which is reviewed by the Head of Healthcare on a quarterly basis.</p> <p>Staff will be reminded of roles and responsibilities in supervising medicine queues, as well as random QA checks being carried out by Head of Healthcare and other SLT members at the prison.</p>	<p>The Governor</p> <p>The Governor / Head of Healthcare</p>	<p>March 2024</p> <p>January 2024</p>



		<p>Observations are shared the following day during the morning briefing, which is attended by a multi-disciplinary team.</p> <p>The Head of Healthcare is developing a “Did Not Attend” (DNA) audit in order to find trends or contributing factors to non-attendance. Any learning from the audit will be used to influence the new profile and allow us to take any actions that could improve attendance rates.</p>	The Governor	October 2024
8	Patients waited far too long for dental treatment.	<p>Dental wait times have been added to the Healthcare risk register which is reviewed monthly by the Head of Healthcare. Following the inspection, HMP High Down have increased the number of dental sessions to 9 per week.</p> <p>The Dental contract is currently under review by CNWL and as part of that the KPI's for the dental service will be reviewed to highlight issues.</p>	<p>Head of Healthcare</p> <p>Head of Healthcare</p>	<p>Complete</p> <p>March 2024</p>
9	The large number of prisoners with limited skills in English and maths did not receive enough support.	<p>HMP High Down will identify those individuals requiring support through an increased numbers of Learning difficulties &amp; disabilities (LDD) assessments.</p> <p>Maths and English courses will become full time so that learners can complete qualifications quicker. It is anticipated that this will improve attendance and course completions.</p> <p>All industries staff will be trained by our Neurodiversity manager to identify prisoners requiring additional support in English and Maths. They will be given numeracy and literacy strategies to support them into their activity areas. They will be signposted and allocated to the Education department in order to improve their skills.</p> <p>HMP High Down will raise the profile, so all staff and prisoners are aware of the services provided by Shannon Trust. The Head of Education Skills and Work will review and relaunch our Reading</p>	<p>The Governor</p> <p>The Governor</p> <p>The Governor</p> <p>The Governor</p>	<p>April 2024</p> <p>January 2024</p> <p>April 2024</p> <p>July 2024</p>



		<p>Strategy. We currently have 8 Shannon Trust Peers who have responsibility for supporting those with either no reading ability or very poor levels of reading. Consideration to increase the number of peers will be explored subject to need.</p> <p>The number of Educations peer will be increased. They will undergo mentoring &amp; training within the Education department, so they have confidence to support their peers in Maths and English classes.</p> <p>Monitoring will take place through Maths &amp; English Assessments and progress evidenced in Education and work areas. This data will be analysed at the QIG Contract management which is held monthly.</p> <p>In cell technology would be important for High Down to transform the offer around education and resettlement, and forms part of the ask for the new education pilot that will be commissioned from 2025. The Governor is working with various HMPPS departments to try and secure a roll out on site.</p>	<p>The Governor</p> <p>The Governor</p> <p>The Governor</p>	<p>July 2024</p> <p>July 2024</p> <p>July 2024</p>
10	Leaders and managers had insufficient oversight to make sure all education, skills and work activities were good.	<p>A quality cycle will be implemented alongside an assurance calendar. There will be a range of activities undertaken in Education and work by management which will include, learning walks, deep dives and observations. Information from these will feed into our quality improvement plan and highlight future actions This will be discussed at the monthly Quality Improvement Group (QIG).</p> <p>A review has begun to evaluate wing work and the number of those allocated to it. The aim is to reach an achievable number for staff to be able to support and monitor which will ensure quality oversight.</p> <p>Quality assurance and targets for improvement will be documented, monitored, and tracked at the monthly QIG and Education Performance Meeting (EPM) both of which are chaired by the Head of Education, Skills &amp; work, and quarterly through the Reducing Reoffending (RR) and PEF meetings.</p>	<p>The Governor</p> <p>The Governor</p> <p>The Governor</p>	<p>January 2024</p> <p>June 2024</p> <p>January 2024</p>



		Further development & support for our workshop instructors is being arranged including completing a skills matrix to identify needs and an outside specialist is booked to deliver industries specific training.	The Governor	January 2024
11	Community offender managers were often allocated far too near the prisoner's release date, which undermined effective resettlement planning.	<p>Timely completion of POM/COM handover is a Probation Service Level Measure (SL20) that is monitored via monthly performance reporting. It is aimed for this to be improved to meet the national target of 95% by September 2024. This action will need to be driven by London Probation Service.</p> <p>PO staffing resource is to be increased to 75% by September 2024, this will be monitored via workforce planning board using target staffing vs staff in post report.</p> <p>PDU briefings will be delivered to enhance understanding and embedding of practice. This will be monitored and managed through Learning and Development committee.</p>	<p>London Probation Service</p> <p>Senior Probation Officer</p> <p>Senior Probation Officer</p>	<p>September 2024</p> <p>September 2024</p> <p>September 2024</p>

