



Home Group is a
proud early adopter of
Together with tenants



13th October 2025

Dear Mr Singleton,

**Response to Regulation 28 Report
Inquest into the death of Christopher John O'Donnell**

I am writing in response to your Regulation 28 Report to Prevent Future Deaths ("PFDR"), dated 21 July 2025, to outline the actions taken by Home Group Limited ("Home Group") to address your concerns.

Home Group has taken this incident, and your findings, very seriously and is committed to continuing to improve the supported housing services we provide. We have taken a proactive approach in addressing your concerns immediately following the conclusion of the inquest, and following receipt of your PFDR, including engaging in consultation with key agencies with whom we work in close partnership to support our service users.

All policies referred to in this response are available on our website¹.

1. Home Group Limited

Home Group is a registered social landlord providing general needs social housing, supported housing and social care services across England and Scotland. We operate over 280 supported housing services across more than 6,700 supported homes in England.

Most of our services, including Canal House at which Mr O'Donnell resided, are supported housing services for people experiencing homelessness, substance misuse issues and / or low to medium level mental health needs. These services offer short term (usually up to two years), low level housing related support. Supported housing services are regulated by the Regulator of Social Housing.

¹ [Home Group | Policies](#)

Home Group's services in the Swindon area, encompassing Canal House, are not commissioned by the local authority to provide support to service users in relation to the handling or administering of medication. In this situation, the responsibility for this would lie with Change Grow Live ("CGL").

The support provided as part of Home Group's supported housing services includes:

- Access to and retaining permanent housing;
- Sustaining a tenancy;
- Accessing employment or training;
- Applying for welfare benefits and managing finances;
- Accessing specialist services provided by other agencies, such as health care and substance misuse services;
- Building and maintaining positive personal relationships; and
- Developing day to day living skills such as cooking and cleaning, with a view to moving onto independent accommodation.

The attached document provides further information about our Living Independently, Feeling Enabled ("LIFE") practice model and the principles we work to in delivering our services.

2. The Coroner's concerns

As detailed in your PFDR, we understand that you are concerned that action was not taken by Home Group in removing stockpiled medication from Mr O'Donnell's room in circumstances where concerns had been raised both internally and externally that he was stockpiling prescribed medication.

When addressing your concerns, it is pertinent to consider the background to Mr O'Donnell's access to and use of prescribed medication whilst residing at Canal House. The supported housing provided at Canal House is not mandated to provide medication management services to its service users. Therefore, in circumstances where a service user is deemed to have capacity, Home Group does not have the authority to interfere with that service user's lawfully held prescription medication. Mr O'Donnell was prescribed Methadone; this is a Class A controlled drug under the Misuse of Drugs Act 1971, Schedule 2, Part 1. Home Group is not permitted to lawfully retain or store controlled drugs at its supported housing premises,

including at Canal House. Where controlled drugs are prescribed, they may be kept lawfully at Home Group's supported housing premises by the recipient of the prescription only.

Having reflected on your findings, Home Group has taken the following action in response to your concerns.

3. Working together with other agencies

Home Group are committed to working in partnership with key agencies to mitigate the risks associated with the stockpiling of prescribed medication in supported housing settings, within the limits of what is legally permissible and within our service remit.

Following receipt of your PFDR, the Operations Manager at Home Group wrote promptly to key agencies in the Swindon area: Park Lane Pharmacy (the local pharmacy to Canal House), Change Grow Live ("CGL"), and the Mental Health Team, Avon and Wiltshire Mental Health Partnership NHS Trust ("AWMHP") based at Chatsworth House, Swindon.

Contact was made in an effort to obtain these agencies' views on how a collaborative working approach could be improved to better safeguard service users who are at risk of harm from stockpiling prescribed medication, in particular controlled drugs such as Methadone, and in circumstances where Home Group is made aware of said risk. Agencies were invited to share their understanding of the circumstances in which stockpiled prescribed medication can be retrieved from a service user / their room, whether there is any legal basis for this, and what practical arrangements can be put in place to facilitate removal in circumstances where concerns have been raised, including specifically what, if any role Home Group can play in this.

a) Mental Health Team

On 21 August 2025, a written response was received from the Clinical Lead in the Swindon Locality who provided a summary of the policies and procedures governing AWMHP's approach to managing medication for service users. Whilst these policies and procedures do not specifically apply to the service remit of Home Group's supported housing services, such as those provided by Canal House, they provide helpful guidance in relation to the local Trust's approach to medication management.

The Mental Health Team has advised that patients own drugs (“PODs”) remain the legal property of the person for whom they were dispensed. Generally, PODs should not be used or disposed of without a service user’s or relatives’ consent, unless a best interest decision is required (in accordance with the Mental Capacity Act 2005), and all such decisions should be documented.

Home Group continues to consult with mental health services to identify what further practical support can be provided by supported housing services in the event that concerns are raised about a resident stockpiling their own prescribed medication.

b) Change Grow Live

On 22 August 2025, the Operations Manager attended a call with CGL to discuss the concerns raised in your PFDR and to agree a clear plan in terms of partnership working moving forward, particularly in circumstances where concerns in relation to the stockpiling of medication by a service user are raised by either Home Group or CGL staff.

It was agreed with CGL that as part of expectations moving forward, any concerns regarding the stockpiling of medication by a service user will be reported by Home Group directly to the relevant local pharmacy who can then either arrange for the collection of the medication or instruct CGL to manage removal. We also agreed that matters concerning the stockpiling of medication should be dealt with at manager rather than support worker level, and that the guidance for support workers will be to escalate any concerns to management. To support this, we are looking to implement a risk assessment checklist as a useful resource for support workers. This checklist is addressed in more detail below.

Home Group is committed to ensuring a close working relationship with CGL is maintained moving forward. As part of this, representatives from Home Group will attend the monthly drop-in session for professionals held by CGL. In addition, CGL have agreed to deliver training to the Home Group team based in the Swindon area in relation to controlled drugs.

To support our joined-up approach with CGL, they have agreed to provide an example working protocol regarding medication management for service users which is in line with those shared between CGL and other partner agencies. Once received, Home Group are keen to agree and implement a tailored working protocol with CGL that is specific to the supported housing services provided by Home Group.

c) Park Lane Pharmacy

On 25 September 2025, verbal feedback was received from the pharmacy who have advised that Home Group staff working in supported housing services can raise any safeguarding concerns in relation to the stockpiling of prescribed medication directly with the pharmacy and/or with the medication prescriber i.e. CGL.

Guidance for staff around raising concerns with the pharmacy and/or prescribers is to be developed in conjunction with the risk assessment checklist addressed below. A written response from pharmacy management is anticipated in due course and Home Group is committed to continuing to consult with the pharmacy moving forward.

4. Improvements in services

a) Multi-agency approach

Home Group is committed to being a part of a multi-agency approach to better assess and manage the risks around the stockpiling of prescribed medication and the associated safeguarding concerns. Our Safeguarding Policy sets out our commitment to share information and work in partnership with other agencies to reduce risks to vulnerable adults and children. We work with statutory and non-statutory agencies to help identify and manage risks to service users and the local community. We also work with service users and those who support them to identify appropriate safety measures that reduce or manage risks, in line with their preferred choices.

In our supported housing services, risk assessment and risk management form an integral part of support planning, overarched by our Support Practice Policy. Providing safe and properly maintained housing is a key factor in safeguarding our service users.

b) Planned policy review

Home Group is planning a full review of its Support Practice Policy.

This policy sets out our overall approach to supporting customers in supported housing services, including our commitment to delivering safe services and effective risk management.

The policy sets out the standards we expect our services to achieve in relation to all aspects of support including handling referrals and admissions to services, assessment and support planning, risk management, working in partnership with other agencies and moving on from services.

The review of the policy will commence in Autumn 2025, with the updated policy being presented for approval by Home Group in Spring 2026. We plan to consult widely with customers, partner agencies and other stakeholders as part of this review and we will carefully consider the findings of the inquest into Mr O'Donnell's death as part of this consultation, especially in relation to updating our approach to risk assessment and risk management.

We are currently in the process of reviewing and refreshing our LIFE support practice model to ensure that it is effective in facilitating compliance with the practice standards set out in the Support Practice Policy. Our review is a focussed on strengthening our approach to risk assessment and risk management, especially when working with individuals thought to be at risk of self-harm or suicide.

We are also planning to carry out a concurrent review of our Tenure Policy, which includes standards around the enforcement of tenancy terms and conditions.

This policy includes standards relating to house rules and access to customers' rooms in specific circumstances. Consideration is being given to updating our Tenure Policy to allow Home Group staff and partner agencies working with a service user to access a service user's room in circumstances where there is evidence of stockpiling, and access has been approved by a manager in accordance with the prescribed risk assessment mentioned below.

c) Risk Assessment Checklist

As part of Home Group's wider planned policy review, we plan to review and update risk assessment templates and risk management plans, alongside training resources and quality assurance checks, to support accurate and timely risk management where there are concerns in relation to stockpiling medication.

We are in the process of developing a 'Risk Assessment Checklist' specific to the stockpiling of medication in supported housing services. A draft checklist is enclosed with this response

which remains in development. Our intention is to pilot the checklist with operational colleagues and to develop guidance and training for staff to sit alongside it.

The checklist acts as a prompt for staff to alert their manager and partner agencies to safeguarding concerns around the stockpiling of prescribed medication. As mentioned, guidance will be developed alongside the checklist with a link to said guidance inserted directly into the checklist for staff to easily access. The checklist is intended to be user friendly and act as a tool for staff to document their concerns about a customer, which can then be discussed with their manager and partner agencies, and appropriate action taken.

The expectation is for the checklist to be used as a tool for staff who have concerns in relation to the stockpiling of prescribed medication where customers are managing their medication independently and are not receiving support from Home Group in relation to medication management.

Where there is evidence that a customer is stockpiling medication, the checklist alerts staff to discussing this as a safeguarding risk with partner agencies, including the prescriber and relevant pharmacy. Managers will have oversight of the checklist as part of our quality assurance approach. Staff are required to review the checklist with their manager and to document what was discussed and any actions agreed.

The checklist will be accompanied with guidance and training for staff around how to complete the checklist and the actions to be taken in circumstances where a staff member has potential safeguarding concerns around a customer stockpiling prescribed medication in a supported housing setting. Staff will be able to access the supporting guidance directly from the checklist which will be made available to all staff via SharePoint.

The checklist forms part of a broader review of Home Group's LIFE support practice model and Support Practice Policy. Home Group have a sharp focus on risk assessment management and plan to further review how the checklist sits as part of the wider support practice framework. The ongoing policy reviews, as detailed above, encompass a broader consideration of Home Group's assessment and management of risk with the checklist forming part of a wider initiative to help facilitate improved risk assessment and management.

d) Virtual clinical hub

Home Group have introduced a virtual clinical hub that provides clinical advice and guidance to all supported services that do not already have a Home Group clinician attached to them. This includes accommodation based, community based and housing management services.

The virtual clinical hub has been up and running for approximately one year and aims to provide:

- Support to embed Psychologically Informed Environments (“PIE”) within supported housing services;
- Support to embed the LIFE framework within services;
- Support to look at risk in different ways and to develop confidence in using a positive risk-taking approach;
- Support for colleagues during ongoing crisis intervention with individual customers;
- Support in improving services to meet contractual needs;
- Support to analyse incidents, lessons learnt and develop positive changes;
- Support to upskill teams and access training and development; and
- Support to access and work with external agencies to enhance customer pathways and break down barriers.

Home Group are committed to continuing to consult with partner agencies to encourage a multi-agency approach to identifying, assessing and managing the risks presented to service users by the stockpiling of prescribed medication. We have sought guidance from partner agencies on how to seek intervention where there are concerns about a service user’s safety and this consultation will remain ongoing.

Yours sincerely,



Executive Director of Customer and Communities