



Department
of Health &
Social Care

Minister of State for Health (Secondary Care)

39 Victoria Street
London
SW1H 0EU

Our ref: [REDACTED]

HM Coroner Amanda Bewley
The Council House
Old Market Square
Nottingham
NG1 2DT

By email: [REDACTED]

20 February 2024

Dear Ms Bewley,

Thank you for the Regulation 28 report of 16 December 2024, sent to the Secretary of State for Health and Social Care, regarding the death of Ms Susan Marie Karakoc. I am replying as the Minister with responsibility for medicine regulation and prescribing.

Firstly, I would like to say how saddened I was to read of the circumstances of Ms Karakoc's death. I offer my sincere condolences to her family and loved ones. The circumstances your report describes are concerning and I am grateful to you for bringing these matters to my attention.

You raised the following concerns:

- there is evidence of search engines readily returning websites which sell prescription medications, including those that sell highly addictive sleeping tablets and painkillers which can and do cause fatalities. I am concerned how readily search engines return websites such as these;
- the current system for monitoring the legitimacy of supply chains for medications available in England and Wales via prescription is not preventing the ready supply of such medications online;
- there is evidence that banks form a legitimate part of the supply chain, and that this is crucial to the functioning of these criminal enterprises. I am concerned that the current system for detecting such criminal enterprises and alerting the relevant authorities is not effective.

Having reviewed these concerns, it is my view that the other departments and agencies with which you have shared the report are best placed to respond directly to the issues you have raised, which are relevant to their respective areas. However, I would like to offer the following information from a Departmental perspective, regarding the safe use of online pharmacies.

When used appropriately, online prescribing provides a valuable route for patient access which takes pressure off GP practices. Prescribers, whether working for the NHS or privately, in-person or remotely, are accountable for their prescribing decisions. They are expected to take account of appropriate national guidance. Prescribers should work with their patient and decide on the best course of treatment, with the provision of the most clinically appropriate care for the patient always being the primary consideration.

In addition to the duty of the prescriber, patients themselves must be honest when providing information to an online prescriber so that they receive advice and medicines which are appropriate for them and so that risks can be managed. Prescribers need full information to be able to prescribe safely.

The General Pharmaceutical Council has published guidance introducing new and strengthened safeguards and checks that online pharmacies must put in place when supplying high-risk medicines. This guidance will also strengthen areas including consultation and communication with the person seeking a medicine/treatment. The updated guidance can be found here: [Online pharmacies to strengthen safeguards to prevent unsafe supply of medicines | General Pharmaceutical Council](#)

The General Pharmaceutical Council (GPhC) and other professional regulators, Care Quality Commission (CQC) and the Medicines and Healthcare products Regulatory Agency (MHRA) have the powers to investigate and take action against prescribers, products and suppliers who do not comply with legislation and national guidance.

In preparing this response, my officials have made enquiries with the Medicines and Healthcare products Regulatory Agency (MHRA) to ensure we adequately address your concerns. MHRA has shared their response with us and I am pleased to note that the website accessed by the deceased was subject to a MHRA investigation, prior to the issuing of the Regulation 28 Report, and a domain suspension request was issued in March 2024 resulting in the website being taken down.

The MHRA's response also includes a list of future criminal countermeasures, which is set to include:

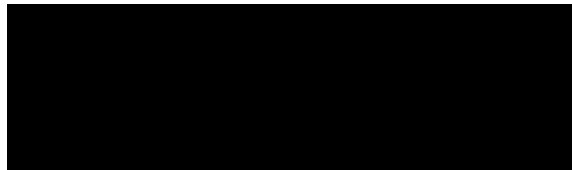
- Enhanced collaboration with search engine and UK internet service providers (ISPs) aimed at blocking harmful content through targeted ISP-filtering;
- Collaboration the Office of Communications (Ofcom) to explore fresh preventative opportunities presented by the Online Safety Act, which will create new rules for social media companies and search engine providers;
- Boosted collaboration with UK Border Force, allowing the MHRA to grow its operational footprint at the border and increase the seizure rates of illegally trafficked medicines;
- The use of cutting-edge technology to identify, track and seize the proceeds of crime, including cryptocurrency;
- Rollout of a web-based online pharmacy checker that will allow users to search if a website or social media listing has been deemed fraudulent by the MHRA.
- Implementation of a web-based reporting scheme allowing users to report suspicious websites, online marketplaces and social media listings to the MHRA;

- Continued commitment to enhancing collegiate working across internet infrastructure community, including private sector and international law enforcement partners.

The MHRA also seeks to identify individuals involved in unlawful activity and where appropriate, prosecute those who put public health at risk.

I hope this response is helpful. Thank you for bringing these concerns to my attention.

Yours sincerely,



MINISTER OF STATE FOR HEALTH