



Department
of Health &
Social Care

Minister of State for Health (Secondary Care)

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London
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Our ref:

HM Coroner Louisa Corcoran
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Aberystwyth
Ceredigion
SY23 3UE

By email:

3rd July 2025

Dear Mrs Corcoran,

Thank you for the Regulation 28 report of 23 April 2025 sent to the Secretary of State for Health and Social Care about the death of Christopher Brazil. I am replying as the Minister with responsibility for medicines regulation.

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

The report raises concerns over the sale of medicines from illegal websites, which look legitimate and are easily found from simple online searches, leading to vulnerable and susceptible people being exposed to counterfeit or unsafe medications. It raises the concern that there are insufficient or no measures to verify patient medical history, age, or identity before selling the medication and drugs, that there is a lack of guidance regarding dosage, and that there are a lack of safeguards to prevent incorrect self-diagnoses or misuse by consumers. It also raises the concern that it is possible for unlawful and unethical online pharmaceutical providers to operate and deliver to the buyer within 24 hours, meaning these illegal websites may be more appealing to some than lawful sources.

The Department is committed to making online prescribing safe. 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.

The General Pharmaceutical Council (GPhC) sets out the precautions to put in place if certain medicines requiring additional safeguards are to be supplied online.

Benzodiazepines refers to a group of drugs, most of which are controlled drugs under the Misuse of Drugs Act 1971, that are subject to additional safeguards. These include but are not limited to assuring that the person has provided the contact details of their regular prescriber, such as their GP, and their consent to contact them about the prescription; and that the prescriber will proactively share all relevant information about the prescription with other health professionals involved in the care of the person (for example their GP). Further information on this can be found here: [Guidance for registered pharmacies providing pharmacy services at a distance, including on the internet.](#)

The above guidance was updated (February 2025) in response to concerns relating to unsafe prescribing and supply of medicines online and now includes strengthened safeguards designed to prevent people from receiving medicines that are not clinically appropriate for them and may cause them harm. Specifically, the February 2025 guidance sets out what to include in a risk assessment when prescribing services are involved, this includes considering how the diverse needs of people using pharmacy services are identified, and how staff get users' valid consent (for example, how staff assess the mental capacity of users). The guidance also sets out strengthened safeguards that should be in place before supplying certain medicines (those requiring additional safeguards, such as benzodiazepines) online. For example, it states that a prescriber should not base prescribing decisions on the information provided in a questionnaire alone. Instead, the prescriber should independently verify the information the person provides and get the information they need to support their prescribing decisions. This could be through timely two-way communication with the person, accessing the person's clinical records, or contacting the person's GP, their regular prescriber, or a third-party provider. The guidance also emphasises the need for a robust process to check the identity of individuals before making prescribing decisions.

GPhC's guidance also clarifies the expectation on those providing digital services to ensure their digital platform is structured in such a way that it cannot mislead the public in any way. Service users should not be misled about the identity of the pharmacies involved in providing services, and pharmacies should provide transparent information on digital platforms, including their GPhC registration number.

To ascertain further details about procedures followed by the provider that prescribed Mr Brazil's medication, you could directly approach the GMC and GPhC who may have responsibility for their regulation.

In a situation where an online provider acts unlawfully, 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. I would like to assure you that regulators have my full support to crack down on any services putting people in danger.

The MHRA, acting on behalf of the Secretary of State for Health, is responsible for the regulation of medicines and medical devices in the UK by ensuring they work and are acceptably safe. This includes applying the legal controls on the retail sale, supply and advertising of medicines which are set out in the Human Medicines Regulations 2012. These regulations also apply to medicines advertised, sold or supplied via the internet.

The sale and supply of unregulated medicinal products is a global problem. Online portals play a significant role in transnational medicines crime and many websites proliferate across the internet. Currently, there is no legal mechanism for UK law enforcement to seize control of illicit overseas domains or compel internet registrars to suspend them. Gaining regulatory compliance can be a difficult and sometimes impossible process, especially when domains are registered beyond the reach of UK jurisdiction.

Public safety is the number one priority for the MHRA and its Criminal Enforcement Unit works hard to prevent, detect and investigate illegal activity involving medicines and medical devices. Last year, the MHRA and its partners seized millions of doses of illegally traded medicines. These products included prescription-only anti-anxiety medicines, opioids and sleeping pills, and falsified and unlicensed lifestyle products used in the treatment of erectile dysfunction, hair loss and weight loss. It also disrupted thousands of links to websites and social media pages selling medical products to the public illegally.

The MHRA also works closely with web-based sales platforms and the internet industry to identify and remove non-compliant medicines and medical devices where possible. Recent collaboration with one well-known online marketplace allowed the use of technology to identify and block more than 1.5 million unregulated medicines and medical devices before they could be advertised to the public.

Through a combination of public empowerment, technological innovation, traditional methods of law enforcement and close collaboration with partners, the MHRA is constantly working to develop new and innovative ways to tackle the online trade in illegal medicines. Some of these future criminal countermeasures will 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 created 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 an online service that will allow users to check if a website selling pharmaceuticals 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.
- Collaboration with UK banking and payment providers to disrupt the payment mechanisms used by websites illegally supplying prescription only medicines.
- The use of Artificial Intelligence to proactively identify illicit internet domains for enforcement action.
- 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.

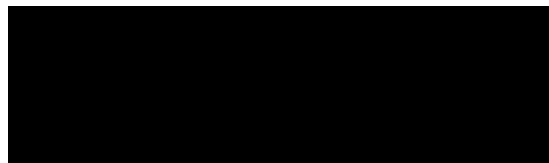
The MHRA's Fake Meds campaign <https://fakemeds.campaign.gov.uk/> encourages people in the UK who buy medication online to take steps to ensure they only use safe and legitimate sources. It also encourages people to report suspicious medicinal products and adverse side effects via its Yellow Card scheme <https://yellowcard.mhra.gov.uk/>.

The Home Office, including the police and other UK law enforcement agencies, is the lead department for tackling the misuse of controlled drugs in the UK.

The efforts of the MHRA and its partners have led to more medicines being seized than ever before, significant custodial sentences for offenders, the forfeiture of criminal profits, and considerable success in disrupting illegal online trading.

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

Yours sincerely,

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Minister of State for Health and Secondary Care