Medicines & Healthcare products Regulatory Agency

MHRA Central Freedom of Information Team
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Canary Wharf
London
E14 4PU

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MHRA Website

[redacted]

Our Ref: **FOI2025/00930**

14 November 2025

Dear [redacted]

Thank you for your Freedom of Information (FoI) request received on 30 August 2025. You wrote:

'This is a request under the Freedom of Information Act 2000 (FOIA) concerning Exchange Supplies Ltd (WDA 20973) and the compliance breaches related to the storage and distribution of prescription-only medicines (POMs) from an unlicensed site (Romans Building, Dorchester).

In addition to my previous disclosures, I would like to request the following information regarding the MHRA's investigation and responses related to Exchange Supplies Ltd and [redacted]

1. Direct Records

* *All internal and external correspondence (emails, letters, memos, etc.) discussing or responding to any concerns raised regarding Exchange Supplies Ltd (WDA 20973), particularly:*
  * *Any correspondence referencing* [redacted] *or any correspondence that includes WDA 20973.*
  * *Any communication specifically addressing the regulatory breaches involving Exchange Supplies' unauthorized dispatch of POMs from Romans Building (unlicensed premises) in breach of Good Distribution Practice (GDP) and WDA regulations.*
  * *Correspondence regarding Edward Morello MP's involvement as a Member of Parliament, specifically referencing his inquiry on my behalf (Case Ref: EM10056 / CEC 227535) and any mention of WDA 20973, compliance issues, or public safety risks.*
  * *Confirmation of any investigation or enforcement action planned or underway following Edward Morello MP's letter to the MHRA on 15 August 2025, or any related internal responses.*

2. Investigative or Compliance Action

* *Internal MHRA reports or assessments regarding Exchange Supplies Ltd's compliance with WDA regulations and Good Distribution Practice (GDP), specifically regarding:*
  * *The unauthorized dispatch of prescription medicines from unlicensed premises (Romans Building, Dorchester).*

** Any actions taken by MHRA in response to [redacted] disclosure in July 2025, including audits, inspections, and any decisions made based on Edward Morello MP's inquiry.*

** Any documentation or communication that details MHRA's response to the cross-border distribution of unlicensed medicines into Northern Ireland, including communication with HSCNI, EMA, HPRA, or other relevant bodies.*

3. Senior-Level Correspondence

** Correspondence, memos, meeting notes, or briefings between MHRA senior staff and any other regulatory bodies regarding Exchange Supplies Ltd, including:*

** Any mention of Edward Morello MP's inquiry on [redacted] behalf, particularly regarding WDA 20973 and the breaches raised.*

** Internal discussions on how to respond to Edward Morello MP's letter dated 15 August 2025, which requested an update on any investigation or enforcement action.*

** Actions or inactions taken in response to the concerns raised by [redacted] including reference to public health risks, vulnerable populations, and non-compliant medicine distribution.*

4. Formats

As defined by FOIA s.84, I request the following formats:

** Emails and attachments, letters, memos.*

** Meeting notes, action logs, reports.*

** Internal and external communications involving Exchange Supplies Ltd and [redacted] disclosures.*

Processing Notes:

** Please ensure compliance with FOIA s.1 & s.10.*

** Exemptions/Exceptions: If any information is withheld under any exemptions (e.g., s.40, s.42, s.36 FOIA), please provide a document schedule identifying each withheld record, the exemption applied, and the public interest test applied.*

** Under FOIA s.16/EIR Reg.9, please provide advice and assistance if any clarification or narrowing is needed (for example, prioritizing specific custodians or dates).*

** Please disclose partial documents or redacted material wherever possible rather than withholding in full.*

** If any correspondence or documents refer to Edward Morello MP's involvement, WDA 20973, or [redacted] disclosures, please ensure that this is explicitly acknowledged.'*

MHRA Response

Thank you for your patience while we considered and prepared our response to your FOI request.

We can confirm that the Agency holds some of the information you are seeking.

Please find attached the documentation which is itemised below:

- Whistleblower disclosure (redacted)
- FOI-2025-00930 - chronological correspondence (redacted)

- CEC 227535 - RE URGENT Whistleblowing Disclosure Exchange Supplies (WDA Breach Intimidation Worker Exploitation) (redacted)
- GDP 20973-113924-0005 - Exchange Supplies Response (redacted)
- Northern trust to MHRA correspondence (redacted)
- EM10056 – MHRA reply to MP correspondence

Information withheld in full under Section 43(2)

- RE EXTFW Movianto Account info
- 04.2 Goods receiving storage & stock control issue 11
- 08.5 Product Recall issue 6
- Exchange Supplies LTD Transport Only V2
- 08.4 Service and Product Feedback issue 7

Please note some filenames have been renamed to remove personal information.
Please also note, while efforts have been made to remove duplicate correspondence because email threads at times crossed over, all instances of duplicates may not have been removed. In addition, we did not wish to delay our response to your request due to the presence of duplicated material.

Please also note, we are unable to provide you with some of the information requested as it constitutes personal data of someone other than yourself and as such, it is being withheld in accordance with section 40(2) of the Freedom of Information Act.

Section 40(2) exempts information in response to a request if it is personal data belonging to an individual other than the requester and it satisfies one of the conditions listed in the legislation. In this case the condition contained in section 40(3A)(a) applies - that disclosure would breach one of the data protection principles, specifically that “Personal data shall be processed lawfully, fairly and in a transparent manner...”.

We do not consider that disclosing this information is necessary or justified in order to satisfy your information request and the requirements of the FoI Act. In relation to this request, we consider that there is no strong legitimate interest that would override the prejudice to the rights and freedoms of the data subject.

Personal data are subject to UK General Data Protection Regulation (UK GDPR) and the Data Protection Act 2018

We can confirm that we hold information about you. However, personal information about you is exempt under S.40(1) of the FOI Act. We understand that you have made a separate Subject Access Request for this information. We have noted that in one email that is part of this FOI disclosure a colleague has remarked that you wish to waive anonymity, however, we do not wish to delay our response in taking steps to check sure that you haven’t changed your perspective regarding anonymity. For this reason, we have redacted your name in the disclosed correspondence. We have also withheld the following documents in full under S.40(1):

- Settlement Agreement (02-12-2024) (12-49)
- Whiistleblowing ExchangeSupplies (redacted)
- Information relating to your employment terms and information related to your legal advice discussions in various emails redacted.

Some of the information you have requested is commercially sensitive and is therefore exempt from release under Section 43(2) of the FoI Act.

Section 43(2) exempts information which, if disclosed, would be likely to prejudice the commercial interests of any person including a public authority. It protects not only the commercial interests of third parties but also the commercial interests of the Agency. It is intended to protect the ability of a public authority like MHRA to obtain goods or services on the best possible commercial terms and to protect the legitimate commercial interests of its suppliers. The information you seek falls into this category.

In this instance we feel that the release of this information could be used to undermine the commercial activities of a third party.

As required by the FoI Act the use of this exemption requires the public interest for and against disclosure to be assessed.

We recognise that there is a small public interest in the disclosure of commercial information relating to the technology used by a third party, their software choices, and technical agreements with other companies.

However, when considering arguments against disclosure We need to ensure that disclosure does not compromise an existing competitive market environment. Competitors would be likely to use this information to gain what is expected to be a small commercial advantage. While we recognise that if the information was to be released to the public domain it would be unlikely to have a major commercial impact, we perceive the public interest in this information to be very low. Therefore, on balance, the public interest gives way to the real risk of commercial harm.

On balance we are satisfied that, in this instance, the public interest in applying the exemption outweighs the public interest in disclosure.

Section 41(1) of the FoI Act has also been engaged, this exemption from disclosure under protects information provided in confidence.

The information you have requested relates to information which was obtained by the Agency from another person and the Agency believes that if this information would be released it would breach the confidence of the person(s) the information pertains to, actionable by them or any other person. Therefore, we are not going to be releasing the requested information.

General Notices

Notice to public readership
Some of the material disclosed through this FOI request might be alarming to patients and the public. The claims and opinions within the whistleblower's disclosure are those of the whistleblower and may not represent the views and opinions of the Agency.

We would like to take this opportunity to offer our reassurances that MHRA have procedures whereby whistleblower disclosures are evaluated, and if necessary, appropriate steps are taken to mitigate risk to public health. In this instance, we do not believe that the quality of the medicine has been altered based on knowledge regarding the impact of short term changes to the storage temperature of this medicine.

MHRA takes breaches of regulatory compliance seriously and where necessary will take action to protect public health. However, regulatory decision making often involves a careful

balancing of risk, options available can include suspending a company's operations. However, the downstream impact to patients due to medicines availability was considered to outweigh the potential for the situation to impact the quality of the medicine.

Patients are reminded that where necessary MHRA do recall medicines and that no such action has been taken in this case. Patients should always continue to use their medicines until such time as they are advised not to by their healthcare professional.

Notice on confidentiality of whistleblower disclosures and information
Whistleblowers raising concerns with the Agency are afforded employment protection under the provisions of the Public Interest Disclosure Act 1998 in England (see 8.1 – Prescribed Person). This includes certain rights to pass information concerning their employer or colleagues activities without risk of detriment. The Agency maintain strict confidentiality in handling such disclosures and make every effort to protect a whistleblowers identity and disclosure. In this case the whistleblower has specified that they do not deem the details of their whistleblowing claim to be confidential.

If you have any queries about this letter, please contact us quoting the reference number above.

Yours sincerely,

MHRA Central Freedom of Information Team
Medicines & Healthcare products Regulatory Agency

Your right to complain under the Freedom of Information Act

If you are not happy with this response you may request an internal review by e-mailing foi.request@mhra.gov.uk or by writing to: MHRA Central Freedom of Information Team, 10 South, Colonnade, Canary Wharf, London, E14 4PU

Any request for an internal review must be received by us within 40 working days of the date of this letter. Please note we are not obliged to provide a review if it is requested after more than 40 working days.

If you are not content with the outcome of the internal review, you may apply directly to the Information Commissioner's Office for a decision. Generally, the Commissioner cannot make a decision unless you have exhausted our own complaints procedure. The Information Commissioner can be contacted at: The Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire SK9 5AF.
Website: ICO FOI and EIR complaints or telephone 0303 123 1113.

Re-use of our information
The MHRA information supplied in response to your request is subject to Crown copyright. Information created by the MHRA which is disclosed under the Freedom of Information Act is made available for re-use under the Open Government Licence (OGL) v3.0, except where this is otherwise stated. There are some restrictions on re-use under the OGL and these can be viewed here:
https://www.nationalarchives.gov.uk/doc/open-government-licence/version/3/