

Minutes of the PSI Audit and Risk Committee meeting, which was convened online, at 12:15 pm on 26 November 2025.

Agenda Item 1 – Closed Session of the Committee

Issue

The Committee met in a closed session with the Registrar from 12.15 -12.35 pm

Agenda Item 2 –Closed Session of the Committee with representatives from Crowleys DFK

Issue

The Committee met in a closed session with Crowleys DFK from 12.35-12.55 pm.

Agenda Item 3 - Attendees & Apologies

Name	Role	Present (Yes/No)
Ms Geraldine Campbell	Committee Chair	Yes
Dr Paula Barry Walsh	Committee Member	Yes
Mr Peter Dewhurst	Committee Member	Yes
Ms Ciara Lynch	Committee Member	Yes
Mr Leon O'Hagan	Committee Member	Yes
Dr Cyril Sullivan	Committee Member joined the meeting at 1315	Yes
Members of PSI staff & non-Committee external attendees included:		
Ms Joanne Kissane	Registrar & Chief Officer	
Mr Dan Burns	Head of Registration and Education	
Ms Damhnait Gaughan	Head of Community Pharmacy Assurance	
Dr Cheryl Stokes	Head of Corporate Services	
Ms Grainne Egan	HR and People Development Manager	
Ms Elaine Cronin	Finance and Business Support Officer	
Ms Eileen Troy	Finance and Support Services Manager	
Mr Neil Wall	ICT Manager	

Ms Ruth Baily	Governance Executive
Mr Tony Cooney	Crowley's DFK (for part)
Ms Fiona O'Sullivan	Crowley's DFK (for part)

Colour code: Red—for decision; Green—for discussion; Blue—for information

Agenda Item 4

Issue

The Chair invited members of the Committee to declare any conflicts of interest with regard to any of the items scheduled for discussion at the meeting before it commenced.

Information

Members of Committees of Council are subject to Section 9, Schedule 1, of the Pharmacy Act 2007 regarding disclosures of interest, as outlined in Appendix 1 of the meeting agenda.

Decision Approved and/or Action Requested

Decision Approved: No conflicts of interest were declared by any member of the Committee with regard to the items scheduled for discussion at the meeting.

Agenda Item 5

Issue

Request for Approval of the Minutes of the Audit and Risk Committee Meeting held on 16 September 2025.

Information

The Chair noted that the draft Minutes of the Audit and Risk Committee meeting held on 16 September 2025 had been circulated to Committee members in advance of the meeting and that no amendments had been received.

The Chair noted that a letter had been sent to the Department of Health on the matter of the Pensions by the Chair and the previous President. The Registrar and Head of Corporate Services advised the Committee that there had been no formal response to the letter, but that the pension matter had been discussed at the PSI – DoH Governance meeting in October and was on the agenda for the next Governance meeting on 2

December. The DoH had requested information from the PSI on various matters to do with both pension schemes, but no headway has been made to date.

Decision Approved and/or Action Requested

Decision Approved: The Committee approved the Minutes of the Audit and Risk Committee meeting, held on 16 September 2025, on the proposal of Dr Paula Barry Walsh, seconded by Mr Peter Dewhurst.

Agenda Item 6

Issue

Strategic and Operational Update

Information

The Committee was updated by the Registrar on the Strategic and Operational work that has taken place since the last meeting.

Core Funding Review: The Committee was advised that Council approved the Core Funding Review Report, along with the supporting reports (Current State Assessment Report, Operating Model Report, and Strategic Workforce Plan), and agreed to proceed to public consultation on the proposed Pharmaceutical Society of Ireland (Fees) Rules at its meeting on 23 October. The public consultation opened on 30 October and will close on 27 November. As of 26 November, at 1 pm, 597 responses had been received. The outcome of the public consultation will be reviewed by the P&R Committee via email and subsequently presented to Council for consideration at its meeting on 11 December. The Department of Health is being kept informed of progress on the Core Funding Review. If Council approves the fee increase, the request will be submitted to the Minister for final approval.

HR and People Strategy: The Culture Audit was completed by EY earlier this year and has informed the development of the HR Strategy 2025-2028. The Strategy will be presented to the P&R Committee for approval at its meeting on 27 November and, if approved, will be submitted to Council for final approval at its meeting on 11 December.

Pricing Transparency: From 1 December, pharmacies will be required to display their fees for professional services, including vaccinations, blood pressure checks, and other services, in accordance with the Guidance to Support Transparency of Medicines Pricing and Fees for Pharmacy Services. Detailed receipts must be provided from January 2026. However, there may be a delay in the rollout of receipts, as IT vendors are currently updating the relevant technology. PSI will commence monitoring and inspection from 1

December and will work collaboratively with pharmacies throughout the implementation period.

Common Conditions Service: Training was launched for Common Conditions on 13 November, and there was a webinar on 6 November held by the IOP, with contributions from DOH, HSE, PSI and IOP. HSE Clinical protocols and PSI guidelines have been published, and the mandatory training for all pharmacists who will participate in the service is now available via the IOP. There will be a public information campaign from 19 January on the service.

As part of the **Pharmacy Workforce Project**, Safe Staffing Guidance will be presented at the RPP meeting on 27 November and then onwards to Council. If approved, they will issue for Public Consultation.

Pharmacy Policy Developments: Training for the Common Conditions Service was launched on 13 November, following a webinar held by the IOP on 6 November, which included contributions from the Department of Health (DOH), HSE, PSI, and IOP. HSE clinical protocols and PSI guidelines have now been published, and mandatory training for all pharmacists participating in the service is available via the IOP. A public information campaign about the service will commence on 19 January.

Reform of the Pharmacy Act and fitness to practise processes: The committee were advised that many other health and social care regulators have either had amendments to legislation to facilitate updates to their FTP processes or are scheduled to have amendments. This issue has been added to the Corporate Risk Register, and PSI have had recent significant discussions with the DoH in relation to Reform of the Pharmacy Act. Work will begin on prioritising amendments to FTP to prepare a gap analysis to bring our legislation in line with other regulators.

Climate Action Plan and Roadmap: The Environmental Policy and Climate Action Roadmap were reviewed by the Health, Safety and Sustainability Committee, considered by the Performance and Resources Committee at its meeting on 17th of September and approved by Council on 2nd of October.

Decision Approved and/or Action Requested

Decision Approved: There were no actions arising from this agenda item.

Agenda Item 7

Issue

Request for Approval of the Internal Auditor's Report on the High-Level Review of System of Internal Control 2025

Information

The Committee was updated on the findings of the Internal Auditor's Report on the High-Level Review of the System of Internal Control 2025 by Mr Tony Cooney of Crowleys DFK. The report was positive, with reasonable assurance provided. There were two minor findings, and both issues are being addressed following the audit. The Committee was advised that there will be an external review of the Risk Management Framework carried out in 2026.

Decision Approved and/or Action Requested

Decision Approved: Following discussion, the Committee agreed to approve the Internal Auditor's Report on the High-Level Review of System of Internal Control 2025 on the proposal of Ms Paula Barry Walsh, seconded by Ms Ciara Lynch.

Agenda Item 8

Issue

Discussion and decision on areas for consideration in developing the internal audit plan for 2026

Information

The Committee discussed the internal audit plan for 2026. Four shortlisted topics had been proposed at the end of 2024;

1. Pensions
2. HR and People Management
3. Data Protection, FOI and Records Management, and
4. High Level Review of the System of Internal Control (which is required annually).

The Committee discussed the four topics and also reviewed the previous audits. Following discussion, the Committee agreed on the following topics for 2026:

1. High level Review of the System of Internal Control (scaled back with an additional focus on data protection and FOI),
2. Pensions, and
3. HR and People Management.

The Committee agreed that the sequence and scheduling of the audits is to be decided between the internal auditors and the Executive.

Decision Approved and/or Action Requested

Decision : Following discussion, the Committee agreed on the following audit topics for 2026:

1. High level Review of the System of Internal Control (scaled back with an additional focus on data protection and FOI),
2. Pensions, and
3. HR and People Management.

Agenda Item 9

Issue

Q3 Cyber Security Report

Information

The Committee reviewed the Q4 Cybersecurity Report, with the Chair noting its comprehensive nature. The Committee was advised that there have been no new incidents since the last report. A desktop exercise as part of the annual review of the Business Continuity Plan is planned for December. Annual penetration testing and vulnerability testing have been completed with a new vendor, and the results were positive. PSI are currently tendering for a new penetration testing vendor, and it is anticipated that the contract will be awarded for three years.

Security awareness training is completed regularly by all staff, with above-industry-average results on phishing testing. The Committee discussed IT training for the Committee and Council, and there was a short discussion on whether there was potential for collaborative procurement with other regulators in relation to the carrying out of penetration tests.

Decision Approved and/or Action Requested

The Committee noted the Q4 Cyber Security Report.

Agenda Item 10

Issue

Review of the Q3 PSI Financial Management Accounts.

Information

The Committee reviewed the Management Accounts, which had been circulated with the meeting papers. Three items were highlighted:

- The deferred income issue identified earlier in the year has been resolved and the system will continue to be monitored, to ensure any anomalies are identified at an earlier stage.
- A variance in Fitness to Practise expenditure was noted in the accounts, with the anticipated outturn being lower than forecast.
- The IOP funding variance is explained in the accompanying notes.

The Committee also noted that the Management Accounts did not include an end-of-year forecast and requested that year-end forecasts be included in future Q3 reports.

Decision Approved, and/or Action Requested

The Committee noted the Management Accounts for Q3, 2025.

Agenda Item 11

Issue

Service Plan and Budget 2026

Information

The Committee was updated on the Service Plan and Budget for 2026 by the Registrar and the Finance and Support Services Officer. The priorities for the coming year under the categories of core functions, ongoing programmes of work and strategic projects are presented in the Service Plan.

The Committee was advised that there would be changes to the Service Plan as circulated following a meeting with the DoH, at which the PSI were advised that work is likely to progress in early 2026 to reform the Pharmacy Act, specifically with regard to the PSI's fitness to practise processes. The PSI have been asked to prepare a gap analysis along with policy proposals and draft legislation to amend the Pharmacy Act in order that the changes to the Pharmacy Act be included in the government's Autumn 2026 legislation schedule. A tracked change version of the Service Plan will be available for review, with the Council papers highlighting the changes.

The Finance and Support Services Officer updated the Committee on the draft budget for 2026, highlighting, as set out in the Core Funding Review Report, that the PSI will continue to operate a deficit, utilising reserves to fund the deficit, until, through an increase in registration fees, the organisation reaches a cost recovery point. The 2026 budget has been drafted based on a 41.75% increase in registration fees, with 70% of this increase applied in 2026, effective from the 1st of April. They provided an overview of the income and expenditure expected for 2026 and responded to queries on the underlying assumptions.

Decision Approved and/or Action Requested

Decision Approved: The Committee noted the Service Plan and Budget.

Agenda Item 12

Issue

TCQR – Update on Implementation Action Plan to operationalise the TCQR route.

Information

The Committee was updated on the ongoing work on operationalising the revised TCQR process. The Committee was updated on the number of applicants at each stage of the process. The Committee was also updated on the progress to procure an exam. The Committee were advised that the initial procurement for an examination failed, and PSI is now involved in direct negotiation with the expectation of awarding a contract in mid-January. The Committee was also advised that, given the volume of applications and continuing volume of applications, PSI may look at bringing a number of assessors in-house, on fixed-term contracts, to deal with the backlog. A business case is being prepared in relation to this.

Discussion followed on the area of identity and qualification fraud that is being seen increasingly by those responsible for qualification recognition of professionals internationally, driven by advancements in AI. The Committee was advised that this will be an area of focus for the PSI into 2026 and beyond.

Decision Approved and/or Action Requested

Decision Approved: The Committee noted the update on TCQR

Agenda Item 14

Issue

Update on the Implementation of Internal Audit Recommendations.

Information

The Committee was updated on the progress of the implementation of recommendations from previous internal audit reports. The Committee was advised that six of the items have been completed and will be removed, with a further six to be completed and removed by March 2026. The Committee was updated on the value of the Community Pharmacy Assurance App, which was developed in-house and is now in use by the inspection and investigations team and facilitated the closure of a high priority recommendation.

The Committee was advised that the Asset register is being completed and should be finished by the end of Q4 or the beginning of Q1 2026. The Committee noted the work and was pleased to see a large number of items being closed.

Decision Approved and/or Action Requested

Decision Approved: The Update on the Implementation of Internal Audit Recommendations was noted by the Committee.

Agenda Item 15

Issue

- (a) Review of the PSI Corporate Risk Register.
- (b) Review of the Registration and Education Risk Registers

Information

The Committee reviewed the Corporate Risk Register. The Committee was advised of the number of PAs currently on the Register and that they would now be obliged to undertake CPD as part of their practice.

Security Risk: A penetration test had been carried out, and the information formed part of the cyber update earlier in the meeting.

People Risk: The business cases for the additional roles identified through the organisation development project are being developed but cannot be submitted to the DoH until the fee increase is in place.

TCQR Risk: As per the update outlined earlier.

Finance Risk: This had been discussed earlier as part of the Q3 Management accounts and Core Funding Review discussion.

The Committee was informed about the new risk that has been added in relation to the Fitness to Practise processes and divergence with other regulators.

The Committee discussed the risk appetite of the organisation and noted some examples where the residual risk was not lower than the risk magnitude, even when all of the mitigating actions had been taken. The Committee discussed framing the Risk Register in such a way that the actions are included to show what has been done to mitigate the risk, where the remaining actions/mitigations are outside the control of the organisation. In these situations, it was suggested that it may be useful to add a 'target risk' score to reflect the expected residual risk when the outstanding actions had been completed.

Registration and Education Risk Register

This was the first report to the Committee on the Registration and Education Risk Register since the new Operating Model came into force. There were two risks for Education and Professional Standards and five for Registration and Customer Relations.

The Committee were updated on the CPD process changes due for implementation for the ePortfolio Review 2026/27, which will mean that all pharmacists registered for 12 months or more will have to submit evidence of CPD annually (whereas up to now, just 20% were called annually).

The Committee were updated on the number of pharmacies where there are supervising pharmacist vacancies, currently sitting at 52 vacancies. The risk is monitored, controls are in place, and an escalation process is applied where necessary.

A risk exists in relation to those returning to practice after a period of not being registered – the Committee was advised that recency of practice rules will be developed in 2026 to help address this risk.

Discussion followed in relation to the recognition of UK pharmacist qualifications, and the Committee was advised that engagement was ongoing with the DOH in relation to the policy decision on how these applicants will be processed post 31 Dec 2025.

Decision Approved and/or Action Requested

Decision Approved: The Committee noted the Corporate Risk Register and the Registration and Education Risk Register.

Agenda Item 16

Issue

Approval of the PSI's Health and Safety Statement

Information

The Committee reviewed the updated Health and Safety Statement. There were a number of minor editorial changes to the statement. The Lone Working section was also updated to reflect the Lone Working Policy. The revised statement had been considered and approved by the PSI Health, Safety and Sustainability Committee and Executive Leadership Team. Following discussion, the Committee approved the policy.

Decision Approved and/or Action Requested

Decision Approved: The Health and Safety Statement was approved.

Agenda Item 17

Issue

Report from PSI Internal Health and Safety Appointee on the management of any major incidents, near misses, and lessons learned, and acted upon.

Information

There was one incident to report since the last meeting. A member of staff fell on the stairs. It was not a major incident and was promptly reported and investigated. Occupational Health was involved, and no further action was needed.

Decision Approved and/or Action Requested

Decision Approved: None.

Agenda Item 18

Issue

Report from the PSI Data Protection Officer on the management of any data breaches.

Information

The Committee was advised that there had been five data breaches since the last meeting. Four related to registration certificates which have gone missing in the post. One was an email sent to the wrong registrant in relation to an application for exemption from participation in ePortfolio Review. There have been 15 data breaches to date this year, although the Committee was informed that most related to certificates going missing in the post, and these would be classified as data incidents rather than data breaches.

Decision Approved and/or Action Requested

Decision Approved: None

Agenda Item 19

Issue

Report from the PSI Freedom of Information Officer on the management of freedom of information requests received.

Information

The Committee was advised that there have been three FOI requests since the last meeting. One in relation to Core Funding, one in relation to Audits and the last a review of a previous decision. Overall, to date in 2025 there have been 12 FOI requests.

Decision Approved and/or Action Requested

Decision Approved: None.

Agenda Item 20

Issue

Committee Dates for 2026

- Thursday 12 March
- Thursday 6 June
- Thursday 10 September
- Wednesday 18 November

Information

The Committee was requested to confirm their availability for the above dates for 2026.

Decision Approved and/or Action Requested

Decision Approved: None.

Agenda Item 21

Issue

Items for inclusion in the ARC report to Council, in addition to those for formal approval.

Information

The Committee discussed additional matters to include in the Report to Council along with the decision items. The Committee noted the Cyber Security Report and the Risk Registers.

Decision Approved and/or Action Requested

Decision Approved: None.

Agenda Item 22

Issue

AOB

Information

There was no AOB

Decision Approved and/or Action Requested

Decision Approved: None

Agenda Item 23

Issue
Closed Session

Information
The Committee met in closed session with the Head of Registration and Education

Decision Approved and/or Action Requested
<u>Decision Approved:</u> None.

The meeting finished at 15.45

Signed:

Chair

Date