PSI
The Pharmacy Regulator
An Rialtóir Cógaisíochta

Report of the Professional Conduct Committee ("the PCC or the Committee") to the Council of the Pharmaceutical Society of Ireland in relation to a complaint made pursuant to Part 6 of the Pharmacy Act 2007 ("the Act").

Introduction - Summary Details

Registered Pharmacist:	Ms Namrah Siddique
Pharmacist Registration Number:	12120
Complaint Reference(s):	773.2023
Date of Inquiry:	29 January 2026
Public/Private Hearing:	Public
Meeting Format:	PSI House, Fenian Street, Dublin 2
Members of Committee:	Ms Susan Ahern SC - Chair Dr Conor McCrystal MPSI Ms Valerie Bowens
Legal Assessor:	Ms Lorna Lynch SC

Appearances:

For the Registrar:	Mr Hugh McDowell B.L Ms Dena Keane Fieldfisher LLP
For the Registrant:	Ms Helen Callanan SC Ms Orla O'Leary, Cantillion Solicitors
Registrant in attendance:	Yes
Witnesses (if applicable):	Mr Shane McGlynn, Authorised Officer, PSI Mr. Noel Stenson expert witness on behalf of Registrar.
Stenography services	Deirdre O'Malley
In Attendance from the PSI:	Ciaran Lyng, Solicitor, PSI Clara O'Reilly, Regulatory Executive, PSI

1. Subject Matter of the Complaint

1.1 This matter concerns a complaint of the Registrar of the PSI dated 30 April 2023 in respect of Ms Namrah Siddique (Registration number 12120). The complaint was referred by the Preliminary Proceedings Committee ('PCC') to this Committee on the grounds of professional misconduct and/or poor professional performance and/or a failure to comply with a provision of the Act or a statutory instrument within the meaning of Section 35(1)(a), 35(1)(b) and 35(1)(ec) of the Pharmacy Act 2007, respectively.

2. Allegations

The allegations against the Registrant as set out in the Notice of Inquiry are:

"That you, whilst a Registered Pharmacist working as a locum pharmacist at Lloyds Pharmacy, Ashleaf Shopping Centre, Crumlin Cross, Dublin 12 (hereinafter referred to as the "Pharmacy"), on or about 06 August 2021:

1. Entered yourself as a "registered vaccinator" on the HSE PharmaVax system in circumstances where you knew or ought to have known that you had not received a certificate stating that you had satisfactorily completed a course of training in accordance with Section 4B of the Medicinal Products (Prescription and Control of Supply) Regulations 2003, as amended (the "2003 Regulations"); and/or

2. Administered the Janssen COVID-19 vaccine (the "Vaccine") to [redacted] *and/or* [redacted] *in contravention of Regulation 5(1)(a) of the 2003 Regulations; and/or*

3. Created and/or caused to be created on the HSE PharmaVax Daily Audit Log a false and/or fraudulent record that you had been administered the Vaccine from [redacted], *Supervising Pharmacist at the Pharmacy on 04 August 2021; and/or*

4. Caused and/or permitted wastage of at least three doses of the Vaccine in circumstances where there were not enough patients scheduled to use all five doses in the vial from which the Vaccines as set out at Allegation 2 above were administered;

and/or

5. Such further or other allegations as may be notified to you in advance of the Inquiry.

AND FURTHER by reason of allegations 1 and/or 2 above, taken individually, you are guilty of professional misconduct in that you acted in a manner that is in breach of Principles 1 and/or 2 of the Conduct for Pharmacists, 2019; and/or

AND FURTHER by reason of allegation 3 above, you are guilty of professional misconduct in that you acted in a manner that is in breach of Principle 2 of the Conduct for Pharmacists, 2019; and/or

AND FURTHER by reason of allegation 4 above, you are guilty of professional misconduct in that you acted in a manner that is in breach of Principle 4 of the Conduct for Pharmacists, 2019; and/or

AND FURTHER by reason of one or more of the allegations as set out at 1 and/or 2 and/or 3 and/or 4 above, either cumulatively and/or in combination, you are guilty of professional misconduct in that you acted in a manner that:

i. Is infamous and/or disgraceful in a professional respect; and/or
ii. Is in breach of Principles 1 and/or 2 and/or 4 and/or 7 of the Code of Conduct for Pharmacists, 2019; and/or

AND FURTHER by reason of one or more of the allegations as set out at 1 and/or 2 and/or 3 and/or 4 above, either individually and/or cumulatively and/or in combination, you are guilty of poor professional performance in that you failed to meet the standards of competence that may be reasonably expected of a registered pharmacist; and/or

AND FURTHER by reason of allegation 2 above, you have breached 35(1)(ec) of the Act in that you have failed to comply in your capacity as a registered pharmacist with a provision of an Act or statutory instrument referred to in Section 7(1)(e)(ii) of the Act; and/or…"

3. Preliminary Application

3.1 Ms Callanan stated that Ms Siddique had made admissions in relation to the allegations, and which admissions were indicated in correspondence on her behalf. She stated that Ms Siddique was amenable to having the matter dealt with by way of undertaking and was willing to consider whatever undertaking would be acceptable to the Committee and that she would undertake not to repeat the action, to adhere to the Code of Conduct Professional Principles, Standards and Ethics for Pharmacists, ("the Code"), legal requirements and professional standards required of her pursuant to her profession as a registered pharmacist. Ms Callanan indicated that Ms Siddique accepted that she is guilty of poor professional performance in relation to certain of the actions. She was regretful of her actions and the time it took her to take responsibility for same.

3.2 The Chairperson stated that it was appropriate for Mr McDowell BL to open the case on behalf of the Registrar and at that the appropriate stage, the Committee could take legal advice from the Legal Assessor in relation to the application. Mr McDowell confirmed that the Registrar was opposing the application for the matter to be dealt with by way of undertaking, but that he would explain the reasoning at the appropriate time.

4. Evidence

Evidence on behalf of the Registrar

4.1 Mr McDowell opened the Notice of Inquiry and indicated that the Registrar would call evidence from Shane McGlynn, Authorised Officer with the PSI and expert evidence would be given by Mr Noel Stenson MPSI. Mr McDowell confirmed that Ms Callanan had indicated on behalf of Ms Siddique that she was making full admissions as to fact.

4.2 Shane McGlynn, gave oral evidence and confirmed that the relevant pharmacy was Lloyds Pharmacy, Ashleaf Shopping Centre, Crumlin, Dublin 12 and that the Superintendent Pharmacist is [redacted] and the Supervising Pharmacist is [redacted] Mr McGlynn referred to a phone call to the PSI from [redacted], on 16 August 2021 concerning Ms Siddique and events that allegedly occurred at Lloyds Pharmacy Ashleaf on 6 August 2021. Mr McGlynn confirmed that [redacted] gave

details of allegations against Ms Siddique and stated that Ms Siddique was suspended on full pay and an investigation interview was taking place on 17 August 2021.

4.3 Mr McGlynn confirmed that the Registrar wrote to Ms Siddique outlining concerns related to the inappropriate use of the HSE PharmaVax system and the administration of and wastage of COVID-19 vaccines. Mr McGlynn confirmed that the letter sought voluntary undertakings from Ms Siddique, which were subsequently received on 20 August 2021, and whereby she agreed not to engage in the Community Pharmacy COVID-19 vaccination programme and/or use the HSE PharmaVax system. In addition, she gave undertakings to practice in accordance with all legislative requirements and to comply with the PSI Code of Conduct.

4.4 On 13 September 2021, the Registrar wrote to Ms Siddique outlining that he was requesting updated undertakings to the effect that she would cease practicing and consent to her removal from the PSI's Register. Ms Siddique responded confirming that her mother had passed away and that the undertaking suggested would be a significant setback in her professional life. Mr McGlynn stated that he emailed Ms Siddique to inform her that because she was not in Ireland, the PSI did not require her to give the undertaking not to practice. Ms Siddique subsequently contacted Mr McGlynn to say that she was returning to Ireland and seeking permission to continue practicing, and the Registrar wrote to inform her that the PSI was no longer seeking an undertaking from her not to practice.

4.5 Mr McGlynn confirmed that he visited the pharmacy and obtained handwritten statements from members of staff which were typed up and Ms Siddique and [redacted] both attended at PSI House for interview under caution. Mr McDowell referred to relevant extracts from the interview with Ms Siddique which were confirmed in evidence by Mr McGlynn. During interview, Ms Siddique had indicated that she inserted details into the PharmaVax system that she had been vaccinated (by [redacted] on 4 August 2021) in error and that she tried to delete the entry. Ms Siddique confirmed that she had administered vaccines to two individuals on 6 August 2021 and Mr McGlynn found out later in the interview that the individuals were Ms Siddique's sister and brother-in-law. Mr McGlynn explained that the Janssen COVID-19 vaccine was a multi-dose vial with five doses in each vial. He asked Ms Siddique what she did with the remaining three

doses after administering the vaccinations, and she stated that she had to waste these doses and put the vial in the yellow sharps bin.

4.6 Mr McDowell referred to relevant extracts from the interview with the Supervising Pharmacist, [redacted]. [redacted] stated that Ms Siddique had asked her about doing vaccines at the pharmacy, but that she had told her she was not doing any vaccines that day, and that she noticed that Ms Siddique was on the PharmaVax computer. [redacted] confirmed that Ms Siddique had registered herself as a vaccinator on the system and that staff were aware that she administered two vaccines to individuals on 6 August 2021.

4.7 Mr McGlynn confirmed that the PSI wrote to Ms Siddique in October of 2022, indicating that the PSI had received certificates of completion for two of four training programmes required to administer vaccines. In her response, Ms Siddique stated that she completed the two additional required courses on the IIOP portal, but that she did not attempt self-assessment to attain the certificates at the time as she presumed she could access this pharmacist e-learning platform at any time.

4.8 Mr McDowell referred to the Medicinal Products (Prescription and Control of Supply) Regulations 2003 as amended ("the 2003 Regulations"). Mr McGlynn gave details of the modular training for administering vaccination together with a self-assessment tool for Pharmacists. Mr McGlynn agreed that although the Regulations referred to having a certificate, in practice, a Pharmacist was required to have five certificates for administering the Janssen COVID-19 vaccination. Mr McGlynn agreed that Ms Siddique had completed three of the component training elements.

4.9 Mr McDowell referred to the response received from Ms Siddique to Mr McGlynn's draft report and the correspondence and statement on behalf of Ms Siddique confirming that she did not intend to challenge the factual evidence. Her statement confirmed that she had entered herself as a registered vaccinator on the HSE PharmaVax system in circumstances where she had not received certificates of completion of the relevant courses of training in accordance with the 2003 Regulations. The statement further confirmed that she had since undertaken the training required and that she had administered a COVID-19 vaccine to two individuals. Ms Siddique stated that she was already vaccinated herself at the time (providing her vaccine certificate at p509 of the

Core Book) and did not intend to create a false or fraudulent record that she had been administered a vaccine on 4 August 2021, when she had not. Ms Siddique admitted in her statement that she caused or permitted wastage of at least three doses of the vaccine. Ms Siddique referred to her personal and family circumstances at the time and the fact that her mother was dying abroad, and did pass away in August 2021. In the statement, Ms Siddique accepted that she ought not to have administered the vaccine and was deeply ashamed and remorseful, that this was an isolated event and that she had worked without further complaint since then. The statement also referred to Ms Siddique struggling to deal with the matter following the events and that she was dismissed from her role with the Pharmacy. Mr McDowell confirmed that appended to the statement was an immunisation certificate for COVID-19 from the government in Pakistan.

4.10 Mr Noel Stenson gave expert evidence on behalf of the Registrar. Mr Stenson confirmed his opinion that each of the allegations individually amounted to professional misconduct and poor professional performance and the allegations cumulatively amounted to professional misconduct and poor professional performance. In respect of allegation 1, Mr Stenson confirmed his opinion that the requirement to have the requisite training and certificates before being registered as a vaccinator was there to ensure public safety. Mr Stenson confirmed his opinion that allegation 1 was within the threshold of seriousness and amounted to poor professional performance. Mr Stenson further confirmed that allegation 1 amounted to professional misconduct as being in breach of the Code, Principle 1 and Principle 2. Mr Stenson also confirmed his opinion that allegation 1 amounted to professional misconduct, which is conduct that is infamous or disgraceful in a professional respect.

4.11 In respect of allegation 2, Mr Stenson confirmed his opinion that Ms Siddique did not have the requisite training and was not authorised to administer the vaccine and this amounted to professional misconduct as a breach of the Code and was infamous or disgraceful conduct in a professional respect. He also confirmed his opinion that allegation 2 amounted to poor professional performance.

4.12 In respect of allegation 3, which concerned the creation of a false and/or fraudulent record on 4 August 2021 that Ms Siddique had been vaccinated, Mr Stenson stated that the certification as a pandemic control measure relied on data integrity. Mr Stenson

confirmed his opinion that allegation 3 amounted to professional misconduct as a breach of the Code and also conduct that is infamous or disgraceful in a professional respect. Mr Stenson confirmed his opinion that it amounted to poor professional performance.

4.13 Mr Stenson gave evidence in relation to allegation 4, which concerned the wastage of three doses of vaccine from the vial. He confirmed his opinion that this was a serious error and that there were critical issues around stock management and wastage of the COVID-19 vaccine at the relevant time. Mr Stenson confirmed his opinion that allegation 4 amounted to professional misconduct as infamous or disgraceful conduct and also a breach of the Code.

4.14 On cross examination. Mr Stenson confirmed that in respect of the Moderna vaccination, two doses were required, but that there was some protection afforded from receipt of the first dose. He also confirmed his understanding that in order to get certified under the modular training system, you needed to complete the self-assessment components. Mr Stenson agreed that his understanding of the structure of the PharmaVax system was that once it was set up, there was a centralised administrator that could change a data entry. In answer to a question from Dr McCrystal, Mr Stenson confirmed that the Johnson & Johnson vaccination was a multi-dose vial (i.e. one vial contained 5 vaccines) and further, that there was a lot more technicality around administering the COVID-19 vaccines compared with flu vaccines.

Legal submission on behalf of the Registrar

4.15 Mr McDowell outlined that it was alleged in the Notice of Inquiry that by reason of allegation 2, Ms Siddique had breached Section 35(1)(ec) of the Act in that she had failed to comply with the provision of the Act or a statutory instrument referred to in Section 7(1)(e)(ii) of the Act. Mr McDowell brought the Committee through the relevant legislation and submitted that the 2003 Regulations were Regulations to which Section 7(1)(e)(ii) referred and therefore is a Regulation to which section 35(1)(ec) of the 2007 Act refers.

4.16 Mr McDowell also referred the Committee to Regulation 4(b) of the 2003 Regulations, which provides that a person shall not supply certain medicinal products except in accordance with a prescription. He submitted that there was a carve out if you meet the

provisions of Regulation 4(b) and you can then administer certain products without a prescription. He stated that Ms Siddique admitted that she did not satisfy the requirements of 4(b) of the Regulations and therefore she did not benefit from the carve out and is subject to Regulation 5(1)(a) which prohibits the administration of the medicine in the absence of a prescription.

Evidence on behalf of the Registrant

4.17 Mr Jonathan Kearney, a former (non-pharmacist) colleague of the Registrant provided a character evidence on behalf of Ms Siddique.

4.18 Ms Siddique made admissions in writing on 20 January 2026 which can be found at page 506-7 of the Core Book. During the period following these events, Ms Siddique noted that she struggled to engage fully with correspondence due to grief, shame and psychological distress.

4.19 Ms Siddique gave oral evidence before the Committee and confirmed that she was registered as a Pharmacist in 2017 and had been practicing for nine years. She stated that prior to these incidents in August 2021, no complaint had been made against her and that there was no complaint since that time. Ms Siddique stated that on 6 August 2021, she was vaccinating her brother-in-law and her sister because of her mother's illness to enable them to travel to be with her and that she herself could not travel to look after her mother due to personal circumstances which she outlined. She stated that her mother was alone and deteriorating and she decided to vaccinate her sister and brother-in-law, so that they could be with her dying mother, who did pass away after this incident. She admitted that this was wrong, and she accepted responsibility for her actions and expressed her remorse.

4.20 In relation to the allegation 1, that she registered herself as a vaccinator, Ms Siddique stated that she mistakenly understood that she was qualified to vaccinate. She stated that what she did was wrong, she should not have done it and she subsequently completed the required training and has not administered vaccinations pending the outcome of the Inquiry. In relation to creating a false record that she had been administered a vaccine, Ms Siddique stated that she was overwhelmed by the stressful situation and that PharmaVax was a totally new system for her and that when she put herself in as being

vaccinated, she realised it was a wrong entry. She stated that she had no intention of making a false record, she wanted to delete it and tried her best to do so but could not. She referred to leaving a note for [redacted] and confirmed that the mistaken entry was ultimately deleted. Ms Siddique referred to the fact that when she administered the vaccines on 6 August 2021 that she was already vaccinated. In relation to the allegation that she had caused wastage of three doses of the vaccine, Ms Siddique stated that nobody else appeared for vaccination and that ultimately she had to waste the vial.

4.21 During her evidence, Ms Siddique outlined her pride in being a pharmacist and her obligations in respect of pharmacy services and patient safety. She referred to being very regretful and ashamed, she apologised and stated that she would not compromise her professional duties again. She stated that this was an isolated incident and she had been acting under emotional pressure at the time. When asked why she did not initially admit that the two people she vaccinated were her sister and her brother-in-law, she stated that she could not afford to lose her job and it was another mistake she made attributable to the overwhelming situation and her personal circumstances.

4.22 On cross-examination, when asked if there was any limitations on her ability to travel in August 2021, she stated that there were not, she was already vaccinated, and her only limitation on travelling was due to her personal circumstances and family circumstances. Ms Siddique confirmed that when she vaccinated her sister and brother-in-law, she gave them a card or certificate of vaccination. However, she denied she created any written document stating that she was vaccinated on 4 August 2021. When asked by Dr McCrystal, Ms Siddique stated that she had not vaccinated anybody prior to vaccinating her brother and sister-in-law on 6 August 2021.

4.23 Following question from Ms Bowens in relation to the first name “Nimrah” appearing on certain documentation and “Namrah” appearing on others, Ms Siddique provided copies of identification documentation to the Committee, with which the Committee were satisfied.

5. **Undertaking Application**

5.1 Ms Callanan stated that the Registrant acknowledged that she was at fault but wanted to explain the context in which she made the poor choices. Ms Callanan stated that her clear instructions were that Ms Siddique was not challenging the witnesses or the evidence, she wanted to participate in a cooperative manner and she had insight into the fact that she did wrong. Ms Callanan referred to her personal family circumstances and Ms Siddique's mother passing away.

5.2 Ms Callanan referred to the requirement to protect the public and stated that she was requesting that the matter be dealt with by way of an undertaking in circumstances where Ms Siddique valued her profession very highly, did not want to put anybody at risk and did not set out to falsify a record. Ms Callanan indicated that Ms Siddique would undertake never to repeat the conduct and that she accepted that it was poor professional performance. Ms Callanan submitted that Ms Siddique had learned a very valuable and painful lesson and she had suffered as a result of this matter over a number of years.

5.3 Mr McDowell stated that the Registrar did not support the matter being dealt with by way of undertaking for a number of reasons and the matter should proceed to the making of findings and the imposition of a sanction. The Registrar's position was that the nature and sequence of the admitted conduct was on a very serious level and that the behaviour warranted a formal and robust response and it was not a case where undertakings would be appropriate. Mr McDowell submitted that dealing with this matter by way of undertaking would not serve to uphold the public confidence in the profession in the same way as the making of findings and the imposition of a sanction.

6. Legal Advice on the undertaking application

6.1 Ms Lynch advised the Committee that the matter fell to be dealt with under Section 46 of the Pharmacy Act of 2007. Ms Callanan had requested that the matter be dealt with by undertaking but the Registrar was not supportive of that approach and that should be taken into account by the Committee, but the submissions were not determinative. Ms Lynch advised the Committee that they must come to their own independent decision as to whether or not it was an appropriate case to request an undertaking. The legal effect

of the requesting and giving of an undertaking was that the complaint would be brought to an end and this would mean that there would be no findings against Ms Siddique.

6.2 Ms Lynch advised the Committee that in approaching the question of an undertaking, the first question was whether they were satisfied they had sufficient detail to make an informed and reasoned decision. Ms Lynch advised that the next step in the process was to ask whether it was an appropriate case to request an undertaking and that the Committee should keep in the forefront of their mind the protection of the public. Ms Lynch advised the Committee that the final step was for the Committee to decide whether the proposed wording was appropriate to meet the circumstances of the case and Mr Lynch referred to the various options available under Section 46.

7. Committee decision on Undertaking

7.1 The Committee decided that it had sufficient information and evidence to assess the appropriateness of an undertaking. The Committee had regard to the admissions made and the terms of the undertaking offered on behalf of the Registrant. The Committee was satisfied that issues of public protection were engaged by the conduct, the subject matter the allegations. The Committee decided that in light of the seriousness of the conduct and the obligations on a Pharmacist in the context of an international health crisis at the relevant time, it was not appropriate case to deal with by way of an undertaking.

8. Closing Submissions

Closing submissions on behalf of the Registrar

8.1 Mr McDowell submitted that in respect of the four allegations, they were all admitted as to fact. Mr McDowell noted that in respect of allegation 3, Ms Siddique accepted that it was a false record but did not accept that it was a fraudulent record and that the Committee had heard her explanation. Mr McDowell referred to Mr Stenson's evidence that each of the four allegations, assuming they were proven as to fact, amounted to poor professional performance and constituted professional misconduct under two limbs, infamous or disgraceful conduct in a professional respect and breach of the Code. Mr McDowell submitted that the substance of Mr Stenson's findings were not challenged on cross-examination and that there was no obvious basis for the Committee to depart from

the conclusions reached by Mr Stenson. Mr McDowell also stated that Mr Stenson found that cumulatively the four allegations amounted to poor professional performance and professional misconduct under the same limbs of the test. Mr McDowell stated that in respect of the allegation of breach of Section 35(1)(ec) of the Act, the breach of Regulation 5(1)(a) was admitted and it followed that the ground of complaint under Section 35(1)(e)(c) was also made out.

8.2 Mr McDowell submitted that the Registrar regarded an appropriate sanction as being the imposition of a censure and robust conditions on Ms Siddique's registration.

Closing submissions on behalf of the Registrant

8.3 Ms Callanan referred to the principle that the least possible sanction should be imposed in circumstances where the purpose is to protect the public and to show the public that it can have confidence in the profession. Ms Callanan submitted that it would not be necessary to attached conditions to Ms Siddique's registration and this would bring the matter to the High Court. Ms Callanan submitted that the seriousness could be reflected by adopting a sanction of censure or admonishment.

8.4 Ms Callanan stated that Ms Siddique had made it very clear that she admitted her wrongdoing and that she was not somebody acting out of self-interest, with a view to profiting or with a view to deceiving or taking shortcuts. Ms Callanan submitted that the attachment of formal conditions would be disproportionate and that there are already requirements on pharmacists, of which Ms Siddique was very aware. Ms Callanan referred to Ms Siddique having lost her job as a result of her actions and that although there were four different allegations, they all emerged from one event and there were not four different occasions. Ms Callanan submitted that Ms Siddique had shown insight prior to the Inquiry and not at a late stage.

Further submissions on sanction - conditions

8.5 Mr McDowell indicated that he had instructions in relation to proposing particular conditions and he provided the Committee with a copy of suggested conditions. Mr McDowell confirmed that Ms Callanan had seen the conditions and that it was the Registrar's position that they were appropriate in the circumstances. Ms Callanan stated

that the attachment of conditions would bring the matter into the High Court. She referred to the conditions being unworkable from the perspective of a locum pharmacist (which Ms Siddique is) and that it involved conditions over which Ms Siddique would not have control and could prevent her from working. Ms Siddique, in reply to questions from the Committee, provided further details in relation to her employment status and stated that it would be difficult for her to work as a locum pharmacist with the proposed conditions.

9. Legal Assessor's Advice

9.1 Ms Lynch advised the Committee that the burden is on the Registrar to prove the allegations to the criminal standard of proof, beyond reasonable doubt. Ms Lynch advised the Committee that they were entitled to rely on the admissions that had been carefully and clearly outlined by Ms Callanan on behalf of Ms Siddique. There were admissions as to fact with one item in relation to allegation 3 not being admitted. Ms Lynch advised the Committee that Ms Callanan's position in relation to that allegation was that Ms Siddique admitted it was a false record but not that it was a fraudulent record.

9.2 Ms Lynch advised the Committee that Mr Stenson had given evidence that each of the allegations amounted to poor professional performance and Ms Siddique admitted that each of the allegations amounted to poor professional performance. Ms Lynch advised the Committee that Mr Stenson also gave evidence that each of the four allegations amounted to professional misconduct as a breach of the Code and also conduct that was infamous or disgraceful. Ms Lynch also advised the Committee that there was an allegation of a breach of the Act under Section 35(1)(ec).

9.3 Ms Lynch provided advice to the Committee on the question of sanction and stated that it had become the invariable practice of Professional Conduct Committees to include a recommendation as to sanction in their reports. Ms Lynch advised the Committee to have regard to submissions by Mr McDowell and Ms Callanan, together with the sanction principles and the PSI Sanction Guidance document. Ms Lynch advised the Committee in relation to the question of public protection, the principle that a sanction must be proportionate, that the Committee must show as much leniency as was possible in the circumstances to Ms Siddique and the purpose of sanction was not to punish an individual registrant. Ms Lynch advised the Committee that they should have regard to the

mitigating and aggravating factors. Ms Lynch advised the Committee that in terms of the practical process of deciding on a recommendation as to sanction, the Committee should engage in a stepped approach starting at the lowest level of sanction and only working upwards if the Committee decided that the lowest level of sanction did not meet the circumstances of the case.

10. Decision of the Committee on the Allegations

Allegation 1

Finding as to fact

The Committee found allegation 1 proven as to fact beyond a reasonable doubt. The Committee relied upon the admissions on behalf of the Registrant and had regard to the authorised officer's report and the oral evidence by the authorised officer, Mr McGlynn.

Finding as to poor professional performance

The Committee found allegation 1 proven as to poor professional performance beyond a reasonable doubt. The Committee relied upon the admissions made by the Registrant and expert evidence by Mr Stenson. The Committee was satisfied that the action of Ms Siddique did not meet the standards of competence that may be reasonably expected of a registered Pharmacist.

Findings as to professional misconduct

The Committee found allegation 1 proven as to professional misconduct beyond a reasonable doubt in a manner that is a breach of Principle 1 (Put the Patient First) and Principle 2 (Act Professionally) of the Code of Conduct for Pharmacists. The Committee relied upon the expert evidence of Mr Stenson and was satisfied that the allegation as proven engaged Principle 1 of the Code and there was a failure to put the patient first. The Committee was also satisfied that the allegation as proven engaged Principle 2 of the Code and there was a failure to act professionally and in particular elements 4, 8 and 10 of the Principle were engaged.

The Committee found allegation 1 proven as to professional misconduct beyond a reasonable doubt in a manner that is disgraceful in a professional respect. The Committee relied upon the

expert evidence by Mr Stenson and was satisfied that the conduct was clearly contrary to what would be acceptable conduct on the part of a registered Pharmacist.

Allegation 2

Finding as to fact

The Committee found allegation 2 proven as to fact beyond a reasonable doubt. The Committee relied upon the admissions on behalf of the Registrant, the authorised officer's report and the oral evidence by the authorised officer, Mr McGlynn.

Finding as to poor professional performance

The Committee found allegation 2 proven as to poor professional performance beyond a reasonable doubt. The Committee relied upon the admissions made by the Registrant and expert evidence by Mr Stenson. The Committee was satisfied that the action by Ms Siddique did not meet the standards of competence that may be reasonably expected of a registered Pharmacist.

Findings as to professional misconduct

The Committee found allegation 2 proven as to professional misconduct beyond a reasonable doubt in a manner that is a breach of Principle 1 (Put the Patient First) and Principle 2 (Act Professionally) of the Code of Conduct for Pharmacists. The Committee relied upon the expert evidence of Mr Stenson and was satisfied that the allegation as proven engaged Principle 1 and there was a failure to put patient first. The Committee was also satisfied that the allegation as proven engaged Principle 2 and there was a failure to act professionally and in particular elements 4 and 8 of the Principle were engaged.

The Committee found allegation 2 proven as to professional misconduct beyond a reasonable doubt in a manner that is disgraceful in a professional respect. The Committee relied upon the expert evidence by Mr Stenson and was satisfied that the conduct was clearly contrary to what would be acceptable conduct on the part of a registered Pharmacist.

Findings as to a breach of the Act

The Committee found that allegation 2 amounted to a breach of Section 35(1)(ec) of the Act beyond a reasonable doubt in that Ms Siddique failed to comply with a statutory instrument referred to in Section 7(1)(e)(ii) of the 2007 Act. The Committee relied upon the admissions made by the Registrant regarding a breach of the 2003 Regulations and the legal submissions on this point.

Allegation 3

Finding as to fact

The Committee found allegation 3 proven as to fact beyond a reasonable doubt but limited to the allegation that Ms Siddique created and/or caused to be created a false record that she had been administered a vaccine by [redacted] on 4 August 2021. The Committee relied upon the admissions on behalf of the Registrant, the authorised officer's report and the oral evidence by the authorised officer, Mr McGlynn.

The Committee was not satisfied beyond a reasonable doubt that the evidence established that Ms Siddique had created and/or caused to be created a fraudulent record.

Finding as to poor professional performance

The Committee found allegation 3 proven as to poor professional performance beyond a reasonable doubt. The Committee relied upon the admissions made by the Registrant and expert evidence provided by Mr Stenson. The Committee was satisfied that the action by Ms Siddique did not meet the standards of competence that may be reasonably expected of a registered Pharmacist.

Findings as to professional misconduct

The Committee found allegation 3 proven as to professional misconduct beyond a reasonable doubt in a manner that is a breach of Principle 2 (Act Professionally) of the Code of Conduct for Pharmacists. The Committee relied upon the expert evidence of Mr Stenson and was satisfied that the allegation as proven engaged Principle 2, in particular elements 4 and 10 of the Principle, and amounted to a failure to ensure public trust and confidence in the pharmacy profession.

The Committee found allegation 3 proven as to professional misconduct beyond a reasonable doubt in a manner that is disgraceful in a professional respect. The Committee relied upon the expert evidence by Mr Stenson and was satisfied that the conduct was clearly contrary to what would be acceptable conduct on the part of a registered Pharmacist.

Allegation 4

Finding as to fact

The Committee found allegation 4 proven as to fact beyond a reasonable doubt. The Committee relied upon the admissions on behalf of the Registrant, the authorised officer's report and the oral evidence by the authorised officer, Mr McGlynn.

Finding as to poor professional performance

The Committee found allegation 4 proven as to poor professional performance beyond a reasonable doubt. The Committee relied upon the admissions made by the Registrant and expert evidence by Mr Stenson. The Committee was satisfied that the action by Ms Siddique did not meet the standards of competence that may be reasonably expected of a registered Pharmacist.

Findings as to professional misconduct

The Committee found allegation 4 proven as to professional misconduct beyond a reasonable doubt in a manner that is a breach of principle 4 of the Code of Conduct for Pharmacists. The Committee relied upon the expert evidence of Mr Stenson and was satisfied that the allegation as proven engaged Principle 4 (Work with Others) of the Code and in particular elements 3 and 5 of the Principle.

The Committee found allegation 4 proven as to professional misconduct beyond a reasonable doubt in a manner that is disgraceful in a professional respect. The Committee relied upon the expert evidence by Mr Stenson and was satisfied that the conduct was clearly contrary to what would be acceptable conduct on the part of a registered Pharmacist.

In light of the above findings by the Committee regarding each allegation on an individual basis, the Committee was satisfied that it was not necessary or appropriate to make findings regarding the allegations on a cumulative basis.

11. Committee Recommendations on Sanction

The Committee makes the following recommendation in relation to sanction:

- That the Registrant should be censured and conditions attached to her registration - as set out herein.

Reasons for recommendation:

11.1 In considering the matter of sanctions, the Committee has had cognisance of the fact that sanctions are imposed in order to: (i) protect the public from a risk of harm and to promote the health and safety of the public, (ii) promote and maintain public confidence in the pharmacy profession and the delivery of pharmacy services and its regulation, and (iii) to promote and maintain proper professional standards and conduct for the members of the profession and those who operate pharmacies. The Committee was also cognisant that in imposing any sanction it must have regard to the principle of proportionality in deciding what sanction to impose and must choose a sanction or sanctions which do not go further than is necessary to meet the overarching objective of protecting the public, as required by the Act. In its assessment it must also afford the Registrant with as much leniency as possible in the circumstances.

11.2 The Committee considered the nature and extent of findings against the Registrant and the seriousness of the findings. While the Committee noted that there was no evidence of any harm or adverse caused to any patient or customer of the pharmacy, the Committee remained of the view that the conduct at issue was very serious.

11.3 The Committee considered that there were a number of aggravating factors present in the case including;

- The nature of the initial denials by Ms Siddique regarding her conduct, the alternative explanations provided by her to her employer and the PSI and the delay in her acknowledging and admitting the true facts attached to the relevant events including the involvement of her relatives. The Committee viewed Ms Siddique's conduct as an abuse of the trust placed in her as a pharmacist and undermined her obligation to deliver safe pharmacy practice including administering vaccinations.

- In this case, the conduct by the Registrant occurred in the context of a vaccine service in the circumstances of the national and international Covid 19 health crisis. The safe administration of vaccines by pharmacists required a level of training and skill and pharmacists were dealing with multi-dose vials (the majority of vaccines that pharmacists had dealt with prior to the advent of Covid-19 vaccines were presented as single dose units). Ms Siddique admitted that she had never vaccinated anyone before and hadn't completed the self-assessment aspects of the modular training required. The misconduct by Ms Siddique also involved compromising the integrity of data concerning vaccinations and the wastage of vaccination doses.

11.4 The Committee carefully considered the mitigating circumstances present in the case and in particular:

- The admissions that were made by the Registrant in respect of allegations 1, 2 and 4 and largely admitted in respect of allegation 3, in terms of the admitted poor professional performance. It was also noted the reasons given by the Registrant as to why she had delayed in engaging earlier in the process.

- The steps taken by the Registrant to correct the deficiencies in her vaccination training and the insight shown by her including in her agreement to voluntary undertakings at the outset of the Inquiry process.

- The Committee had regard to the fact that the Registrant enjoyed an unblemished career prior to the matters giving rise to the Inquiry and had continued to practice since the event without coming to the attention of the Regulator.

- The conduct at issue was not part of a pattern of conduct and constituted conduct over a single day.

- The fulsome remorse and apology from the Registrant were also considered by the Committee.

11.5 The Committee considered the submissions regarding the Registrant's personal and family circumstances that were persisting at the time of the incident. And while the Committee sympathised with the very difficult circumstances of her mother's ill health and ultimate passing, the Committee was of the view that this was not a significant mitigating factor and did not excuse the conduct at issue.

11.6 In considering the appropriate and proportionate sanction, the Committee had regard to the fact that Ms Siddique lost her job at the relevant time as a consequence of the events, that an extended period of time had elapsed since the events of August 2021, that Ms Siddique wanted to return to practice after her recent maternity leave and the requirement to be as lenient as permissible to Ms Siddique in all the circumstances.

11.7 In considering the level of sanction, the Committee was of the view that the sanction of admonishment would not adequately reflect the seriousness of the findings, the factual circumstances and the importance of protecting the public.

11.8 The Committee was of the view that the sanction of censure was appropriate but the Committee went on to consider whether the sanction of censure alone was sufficient to protect the public. The Committee carefully considered the question of conditional registration, the Registrar's submissions that there should be conditions attached to Ms Siddique's registration and the submission on behalf of Ms Siddique opposing the imposition of conditions. The Committee decided that having regard to the nature and extent of the underlying conduct, the issues of public protection engaged regarding the extremely important function of the administration of vaccines, the requirement to maintain public confidence in the profession of pharmacists and the importance of upholding professional standards, censure and conditional registration was appropriate. The Committee was not satisfied that concerns about difficulties in subjecting Ms Siddique to conditional registration, which were expressed as potential difficulties only, were sufficient to mitigate against the imposition of conditions. The Committee carefully considered the wording of the conditions proposed by the Registrar and was satisfied that the conditions were clear, workable, necessary and proportionate.

11.9 The Committee recommendation is that the sanction of censure be imposed together with the attachment of the following conditions to Ms Siddique's registration:-

That, under Section 48(b)(ii) of the Pharmacy Act 2007, the following conditions be attached to Ms Siddique's registration:

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a. That Ms Siddique engages an independent and external consultant Pharmacist ("the Consultant Pharmacist"), to be approved by the Registrar in advance, to:

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i. draw up a professional development plan for Ms Siddique; *and*

ii. review Ms Siddique's practice with a specific focus on:

i. her understanding of the regulatory requirements in respect of the management and administration of vaccines in Ireland by Pharmacists; and

ii. accurate record keeping and data integrity; and

iii. practising within the scope of her competence and in accordance with the Code of Conduct and all applicable legislation.

b. That Ms Siddique fully comply with all advice, guidance and recommendations of the Consultant Pharmacist with regard to appropriate learning activities and assessment modalities, which may include specified education courses, training or other means, which may range from workplace learning to formal assessed programmes.

c. That this development plan shall remain in place for a period of six months from the date of confirmation of sanction or from the date of Ms Siddique's return to practise as a Pharmacist following her period of planned leave, whichever date is later. It shall include at least two reviews of Ms Siddique's practice by the Consultant Pharmacist. The first review shall be conducted within eight weeks of the commencement of these conditions and the second audit shall be completed at the end of the six-month period, with formal written reports to be submitted to the PSI following each review. Each report shall include details of Ms Siddique's progress on all learning activities recommended by the consultant, to include details as to whether those activities have been undertaken and completed.

d. That Ms Siddique bear all costs associated with her compliance with these conditions.

SIGNED: 

Susan Ahern SC
Chairperson

Date: 23 March 2026

Made Public: 13 April 2026