Minutes of the PSI Audit and Risk Committee meeting, which was convened online, at 12:15pm on Tuesday 16 September 2025.

Agenda Item 1 –Closed Session of the Committee

Issue
The Committee met in a closed session with Crowleys DFK from 1215-1230.

Agenda Item 2 - 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
Ms Anna McMahon	Committee Member	Yes
Dr Cyril Sullivan	Committee Member – departed at 1405	Yes
Members of PSI staff & non-Committee external attendees included:		
Ms Joanne Kissane	Registrar & Chief Officer	
Mr Des Butler	Acting Head of Legal Affairs, Governance and Programme Delivery and Data Protection Officer and FOI 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 and Corporate Reporting Manager	
Ms Ruth Baily	Governance Executive	
Mr. Tony Cooney	Crowley's DFK (for part)	

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

Agenda Item 3

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 4

Issue
Request for Approval of the Minutes of the Audit and Risk Committee Meeting held on 29 May 2025.

Information
The Chair noted that the draft Minutes of the Audit and Risk Committee meeting held on 29 May 2025 had been circulated to Committee members in advance of the meeting and that no amendments had been received.

Decision Approved and/or Action Requested
Decision Approved: The Committee approved the Minutes of the Audit and Risk Committee meeting, held on 29 May 2025, on the proposal of Dr Paula Barry Walsh, seconded by Mr Peter Dewhurst.

Agenda Item 5

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. The Registrar advised the Committee that PSI has been working with the DoH and other stakeholders as part of the Community Pharmacy Expansion Implementation Oversight Group (IOG) on the implementation of the recommendations of the Expert Taskforce to expand the scope of practice of pharmacy; specifically in the development of a Common Conditions Service and Continuation of Contraception Service. The Registrar provided an update on the status of the enabling legislation, the draft protocols, training and education for pharmacists, and the outcomes of the public consultation on the draft rules and guidance, which will be considered by the Regulatory and Professional Policy Committee at its meeting on 18 September. The Minister is expected to launch the scheme in November. Training for pharmacists will be available at the end of October with the service expected to begin in January 2026.

Following a request from the DoH, the PSI have been working on developing Guidance on Pricing Transparency in Pharmacies. The Committee was informed that a public consultation was conducted on the draft guidance for a four-week period during the summer. Following the completion of the public consultation, minor amendments were made to the guidance. The amended guidance and consultation report will be considered by the RPP on 18 September. The final guidance, together with the public consultation report, will be submitted to the Minister if approved by the RPP Committee and Council. The PSI will monitor the implementation of the guidance as part of the inspection process. The Committee was informed that a 'use and learn' phase would be implemented during the rollout of the guidance, and that PSI would share best practices as implementation progressed.

The Council approved the continued recognition and approval of the Royal College of Surgeons in Ireland, Trinity College Dublin, and University College Cork's MPharm degree programmes for a period of five years at the June Council meeting. Council also confirmed it was satisfied that conditions one and two attached to the University of Galway's MPharm degree programme accreditation were met at the June Council meeting. The University of Galway commenced its programme in September 2025. In addition, at an out-of-course Council meeting in August, the Council approved the recognition of the MPharm Programme at Atlantic Technological University (ATU), subject to the conditions specified in the evaluation report. ATU commenced its programme in September 2025. The Committee was informed that the South Eastern Technological University have applied for recognition and approval of a proposed Master's Degree Programme in Pharmacy and that the evaluation report from the Accreditation Team would be considered by the RPP Committee on 18 September.

As part of the Workforce Intelligence Report, the Workforce Survey has been issued for this year. The survey will look at both qualitative and quantitative data.

In June Council reviewed draft rules for a Delineated model of Pharmacy. A delineated model would allow the retail part of a pharmacy to remain open in the absence of a pharmacist, but would not permit the sale or supply of any medicines during the pharmacist's absence. This would allow pharmacists to take rest periods and lunch

breaks. Following the publication of the draft rules, a public consultation was conducted over a four-week period during the summer. The consultation report and proposed RPB registration rules will be considered by the RPP at their upcoming meeting.

The operating model of the PSI was reviewed in the early part of the year with the support of EY. Following the conclusion of the work, EY delivered three reports: a Current State Assessment Report, an Operating Model Report, and a Strategic Workforce Planning Report. The outputs of the Strategic Workforce Report were an important input into the Core Funding Review.

The Committee was updated on the ongoing work regarding the Core Funding Review, which is being supported by Mazars, who were appointed following a procurement process. One of the recommendations following the review is an increase in the fees. The Registrar informed the Committee that the fees were first implemented in 2008, decreased in 2010 and decreased again in 2014. There has been no change to the fees (except for those implemented for the TCQR process) since 2014. The report will be discussed by the P&R Committee on September 17, and a discussion will follow at Council on October 2.

Work has begun on the HR and People Strategy. The Culture Audit was conducted earlier in the year and presented to all colleagues during a workshop at the August Anchor Day. The outputs of the Culture Audit will help to shape the HR and People Strategy.

Decision Approved and/or Action Requested
Decision Approved: There were no actions arising from this agenda item.

Agenda Item 6

Issue
Request for approval for amended Terms of Reference of the Committee

Information
The Committee was asked to update the Terms of Reference to introduce the use of Microsoft Teams Transcripts, or other appropriate tools for recording Committee meetings, whether held in person, hybrid, or online, within strict parameters. Following discussion, the Committee agreed to update the Terms of Reference of the Committee.

Decision Approved and/or Action Requested
Decision Approved: Following discussion, the Committee agreed to update the Terms of Reference of the Committee on the proposal of Ms Ciara Lynch seconded by Mr Peter Dewhurst.

Agenda Item 7

Issue
Request for Approval of the Internal Auditor's Report on the PSI's Third Country Qualification Recognition (TCQR) route.

Information
Mr Tony Cooney from Crowleys DFK joined the meeting to present the TCQR Audit. The Committee was advised that the audit provided significant assurance on the adequacy and operating effectiveness of controls to ensure that third-country applicants for registration have the appropriate qualifications to be entered on the register. There were a number of minor findings, which, when addressed, will further strengthen internal controls and address gaps identified in the current process. Overall, Crowley's advised the Committee that the audit should provide considerable comfort to both the Committee and Council regarding the overall operation of the TCQR route. The Committee noted the positive Audit and commended the work of the TCQR team. The Committee discussed the overall numbers currently in the application process, the timelines, and the risks associated with any potential delays for those in the process. The Committee was advised that until the pending applications were cleared, it was difficult to determine what a normal steady state for the TCQR route will be. Following discussion, the Committee approved the Internal Auditors' Report on the PSI's Third Country Qualification Recognition (TCQR) route.

Decision Approved and/or Action Requested
Decision Approved: Following discussion, the Committee recommended the approval to Council of the Internal Auditors Report on the PSI's Third Country Qualification Recognition (TCQR) route at its meeting on 2 October, on the proposal of Ms Anna McMahon, seconded by Ms Ciara Lynch.

Agenda Item 8

Issue
Q3 Cyber Security Report

Information
The Committee reviewed the Q3 Cybersecurity Report, with the Chair noting its comprehensive nature. It was highlighted that the report follows a new format, as recommended by Crowleys following the presentation at the Committees last meeting. This updated format includes an executive summary at the beginning and concludes with

clearly outlined actions and recommendations. The Committee was also briefed on a recent bot attack targeting the PSI Registration System and the implementation of a solution to reduce the risk of further incidents. Additionally, it was noted that a penetration test is scheduled for Q4, with a tender process currently underway to appoint a new provider. The Committee discussed the ongoing phishing simulations, PSI's performance relative to industry benchmarks, and the additional measures being taken to strengthen the organisation's cybersecurity posture.

Decision Approved and/or Action Requested
Decision Approved: There were no actions arising from this agenda item.

Agenda Item 9

Issue
Review of the Q2 PSI Financial Management Accounts.

Information
The Committee was advised of an issue related to the treatment of deferred income, which arose due to a technical error in the PSI Registration Portal. As a result, income for Q1 2025 had been overstated in the system. To ensure accuracy, the management accounts for Q2 2025 were prepared with a manual adjustment to correct the figures. A solution to address the underlying issue has been identified and will be implemented shortly. Dashboards have also been developed to support the implementation of the fix and to enable early detection of any future issues. The Committee inquired whether the issue would have caused the 2024 Financial Statements to be incorrect, and was advised that the 2024 Financial Statements were accurate. Following the discussion on the IT issue, the Committee was presented with the Q2 Management Accounts and the year-end forecast. It was noted that the projected deficit for the year, originally budgeted at €3 million, is now expected to be approximately €2 million. The Committee reviewed the key areas of variance in both the income and expenditure and was provided with an overview of the accompanying explanatory notes.

Decision Approved, and/or Action Requested
Decision Approved: The Committee noted the Management Accounts for Q2, 2025.

Agenda Item 10

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

Information
The Committee was updated on the progress of the Implementation of the Action Plan to operationalise the TCQR route. The Committee was advised that the letters of engagement for the Holistic Assessors would be sent during the week of 15 September and that PSI has been engaging with its insurers regarding the requirement for the assessors to hold professional indemnity insurance. The position has been clarified, and the letters will be sent the week of 15 September. PSI have been engaging with likely providers in relation to the TCQR examination. The original tender process failed to provide a supplier, and PSI will now commence a direct negotiation process. The actions are reviewed weekly at both a dedicated TCQR meeting and the ELT meeting.

Decision Approved and/or Action Requested
Decision Approved: The Committee noted the update on the Implementation Action Plan to operationalise the TCQR Route and asked that the agenda item be brought back to its meeting in November.

Agenda Item 11

Issue
Update on the Implementation of Internal Audit Recommendations.

Information
The Committee was updated on the Implementation of Internal Audit Recommendations. The Committee was advised that one recommendation had been closed since the last meeting. The Committee noted that work is ongoing on a number of the recommendations, and these would be completed by the end of Q3 or Q4. There was a short discussion on two items and on how they will be progressed into the new year.

Decision Approved and/or Action Requested
Decision Approved: The Update on the Implementation of Internal Audit Recommendations was noted by the Committee.

Agenda Item 12

Issue
(a) Review of the PSI Corporate Risk Register. (b) Review of the Corporate Services Business Area Risk Registers

Information
The Committee reviewed the Corporate Risk Register. The Committee was advised of the addition of a new risk concerning the funding available to PSI, which is insufficient to allow PSI to carry out its functions to the required level. The Committee was informed that the regulatory risk associated with the potential lack of oversight of retail pharmacy businesses operating within a hospital setting due to a lack of clarity provided under the Pharmacy Act 2007 had been removed as the PSI had undertaken research to assess the extent of medicine supply in such settings, with a report submitted to the Department of Health in July 2025 to inform the hospital licensing regime and potential legislative amendments. The Corporate Services Business Area Risk Registers were discussed individually. **Financial and Support Corporate Risk Register**: The register was reviewed, and the Committee had no questions. **HR Risk Register:** There was a discussion around the delay in updating HR policies due to a lack of resources. The resourcing issue has been addressed, and the policies are being updated with those deemed more urgent being completed as a priority. **ICT Risk Register**: The Committee noted the risks and the mitigating measures in place, particularly in relation to cybersecurity. The Committee noted that some risks on the registers may not reach the threshold to be considered risks and some of the timelines may be tighter than necessary, putting pressure on the Executive. The Committee suggested a review of the registers to ensure the risks and timelines are appropriate.

Decision Approved and/or Action Requested
Decision Approved: None.

Agenda Item 13

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 were no incidents to report by the PSI Internal Health and Safety Appointee.

Decision Approved and/or Action Requested
Decision Approved: None.

Agenda Item 14

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

Information
The Committee was advised by the Data Protection Officer that there had been three data breaches since the last meeting. Two did not reach the threshold for reporting to the Data Commissioner. The third was reported to the Data Commissioner within the 72-hour deadline.

Decision Approved and/or Action Requested
Decision Approved: None

Agenda Item 15

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

Information
The Committee was advised by the Freedom of Information Officer that there were three FOI requests since the last meeting. One received last week, and a decision maker has been appointed, and the response will go within the deadline. A second was received in August and was responded to within the deadline. A third is in train, and PSI is in correspondence in relation to the scope of the enquiry, as the FOI was broad in its scope.

Decision Approved and/or Action Requested
Decision Approved: None.

Agenda Item 16

Issue
AOB

Information
The Registrar informed the Committee that the PSI has been advised that a Periodic Critical Review (PCR) of the organisation will be conducted in 2026. The Chair noted that once a time for the PCR is confirmed, it may be necessary to review the timing of audits for next year.

Decision Approved and/or Action Requested
Decision Approved: None

Agenda Item 17

Issue
Closed Session

Information
The Committee met in closed session with the Acting Head of Legal Affairs, Governance & Programme regarding an ongoing matter.

Decision Approved and/or Action Requested
Decision Approved: None.

The meeting finished at 14.47

Signed:

____ ____

Chair **Date**