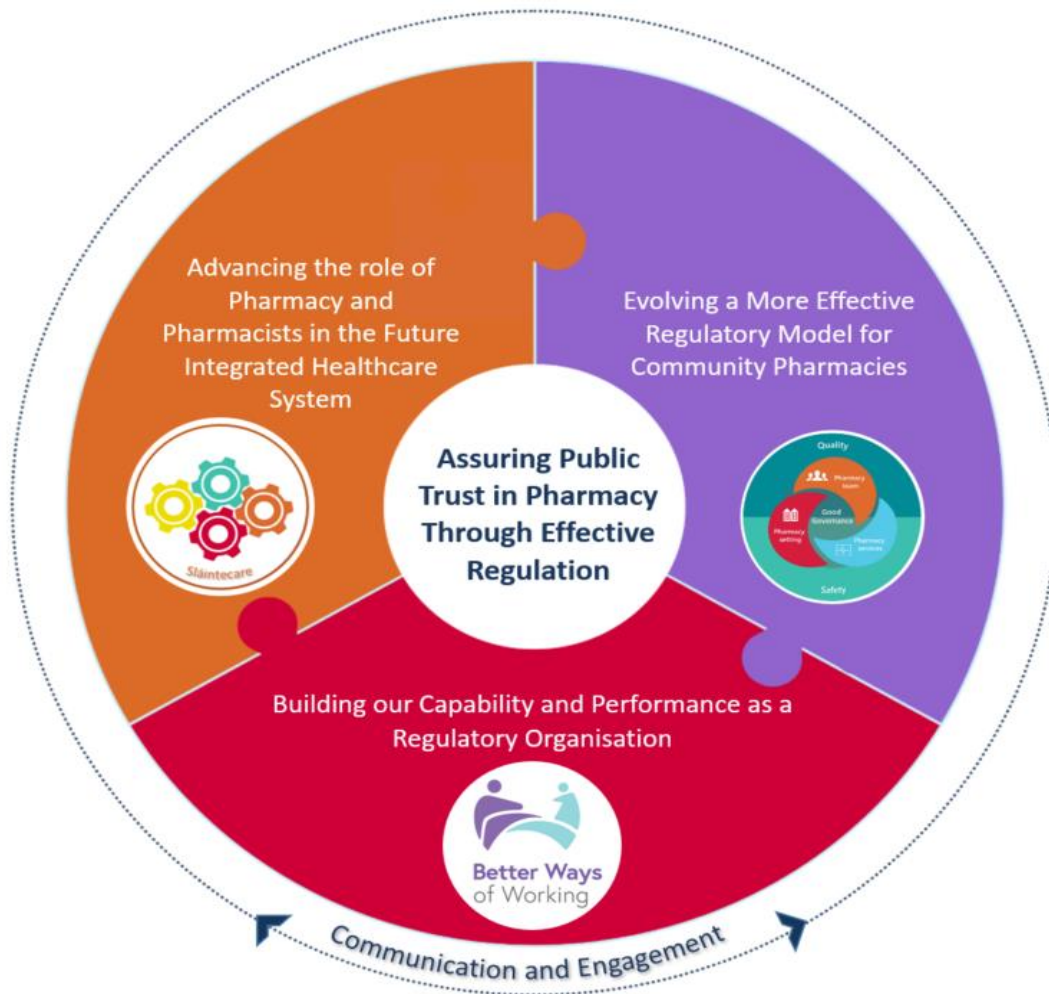


Report of the Interim Registrar



Report to Council Meeting of 15 December 2022

Highlights and general engagement updates from the Interim Registrar

Healthcare Strategic Workforce Planning

Significant work regarding this issue is in train across the health system. While the Department of Health progresses with its project being delivered by Indecon (reported on in the April Interim Registrar's Report to Council), a sub-group of the Health and Social Care Regulators' Forum is leading out on a related piece of work to be submitted to the Department for its consideration.

On the pharmacist workforce side, PSI has been intensively engaged in a series of activities which are reported on under the updates relating to the strategic objective of 'Advancing the Role of Pharmacy and Pharmacists in the Future Integrated Healthcare System' (see page 6).

Meetings with stakeholders regarding the current acute workforce challenges and the mid-longer term strategic view are also reported on in the Communication and Engagement Update section below. PSI continues to respond to parliamentary questions and representations from TDs in relation to this matter.

Meanwhile, our strategic project continues to make good progress now that we have an external service provider appointed (see full update on page 6).

One particular initiative that PSI is advancing in engagement with the IPU is in relation to the potential of a mechanism to separate a registered Retail Pharmacy Business (RPB) from the retail section of a pharmacy in order to facilitate closing the pharmacy for pharmacist lunch breaks and to allow the retail section to remain open for longer periods. PSI is currently considering the guidance for RPBs that will need to be developed to support this initiative. The timeframe for these developments for Council consideration will be Q1/2 2023.

Ireland's second One Health National Action Plan on Antimicrobial Resistance 2021-2025 (iNAP2): Mid-term Review

iNAP2 was published jointly by the Departments of Health (DOH) and Agriculture, Food, and the Marine (DAFM) in November 2021. iNAP2 is the successor plan to Ireland's first National Action Plan on Antimicrobial Resistance (AMR) 2017-2020 (iNAP1) and outlines over 150 actions to tackle the threat of AMR.

The DOH engaged with stakeholders, including PSI, as part of the mid-term review of the human health actions.

As a key stakeholder in the delivery of iNAP2, PSI had committed in September 2021 to a number of actions outlined in Strategic objective 1 relating to improving awareness and knowledge. As part of the Review, we set out the progress made to date and PSI's future plans regarding our actions

committed to under iNAP2. In our 2023 Service Plan, a regulatory programme of work has been built around ensuring we continue to deliver on those iNAP2 commitments and we will be updating Council on those actions at each Council meeting.

Also, towards the end of October, we took part in a European Commission study on AMR in relation to research on the barriers to effective development and implementation of national policies on AMR.

Communication and Engagement Updates

Overview of recent external meetings and engagements attended by Interim Registrar and PSI staff	
October-December (Bi-weekly meetings)	National COVID-19 Vaccination Programme – Pharmacy Workstream Working Group: this group meets to discuss ongoing roll-out of the COVID-19 and the influenza vaccination programmes in community pharmacy. It is chaired by the HSE and also includes representatives from across the HSE, from the IPU and the Department of Health as well as the PSI.
10 October	We met with the Department of Health. The focus of this meeting was to discuss the mid-term PSI 2021-2023 Corporate Strategy review.
11 October	We attended the National Patient Safety Office Conference. This year's theme was "Working Together for Patient Safety" and aimed to look beyond COVID-19 and highlight how collaboration and people are drivers to advancing quality and patient safety in the health system.
11 October	Meeting with the Department of Health to discuss current workforce matters.
13 October	We met with the IPU to discuss a proposed model for delineating retail pharmacy businesses.
Mid-October	As part of the development and review of the draft IOP workplan for 2023, we held engagement meetings with the Department of Health (DOH) and representatives from the Health Service Executive (HSE) including representatives from the Quality Improvement Division (QID), Primary Care Reimbursement Services (PCRS), Antimicrobial Resistance and Infection Control (AMRIC), National Immunisation Office (NIO), Medicines Management Programme (MMP) and the National Cancer Control Programme (NCCP). The purpose of the engagement meetings was to identify expected training needs for pharmacists for 2023.
19 October	We met with the Clinical Lead of ePharmacy who provided us with an update on the progress made to date in relation to the ePharmacy project, which is tasked with the development of an e-prescribing solution for Ireland.
20 October	We attended and hosted a 'virtual stand' at the Future of Pharmacie event, organised by APPEL. Our two fourth year MPharm students helped plan our involvement and answered questions from fellow students about their experience of undertaking a placement with the PSI.
26 October	Introductory meeting with the recently appointed IPU Secretary General and her team with the Interim Registrar and other members of PSI's Executive Leadership Team.

26 October	As part of our membership of the European Directorate for the Quality of Medicines and Healthcare, which is a Directorate of the Council of Europe, we attended the Committee of Experts on Quality and Safety Standards in Pharmaceutical Practices and Pharmaceutical Care meeting
28 October	Attended conference in Dublin ('Design in Government: Impact for All') as part of launch of Government's Design Principles for Government in Ireland. The Department of Public Expenditure and Reform and Creative Ireland launched a prototype of design principles created to embed design techniques into public services.
Late October/early November	We visited each of the three schools of pharmacy (RCSI, UCC and TCD) and presented to first year MPharm students, introducing them to the PSI and our role. Our fourth year MPharm students also spoke to them about their experience of being on placement in the PSI.
2 November	We attended the International Pharmaceutical Federation (FIP) launch of their Global Framework for Educators and Training in Pharmacy
8 November	We participated in the Department of Health organised meeting with the IPU and the PSI (the HSE sent apologies) to discuss actions arising from the outputs of the IPU's Summer 2022 workforce survey.
9 November	We attended the online conference hosted by the Professional Standards Authority which explored the themes and issues arising from the report recently published by the Authority, <u>Safer care for all – solutions from professional regulation and beyond</u>
10 November	We participated in a sub-group of the Health and Social Care Regulators Forum (hosted by CORU), in relation to strategic workforce planning
10 November	We met with members of National Patient Safety Office at the Department of Health as part of its consultation regarding the development of a national complaints and patient safety incidents policy framework in line with the Programme for Government priority objectives. The work at this early stage involves key stakeholder engagements to consider their views and opinions in developing any policy framework.
11 November	Meeting held online between the IPU President and the IPU Standing Committee (IPU President, IPU Vice-President and the IPU Treasurer) with the PSI President. Agenda included discussion on the Third Country Qualification Recognition Route (TCQR) – current and revised; fitness to practise matters (trends, KPIs); Pharmacy Act reform and progress.
11 November	We attended a meeting of the Paracetamol Working Group established by the National Suicide Research Foundation to provide feedback on an educational flyer being developed for all pharmacy staff on the safe supply of paracetamol-containing products
18 November	At the request of the Royal Pharmaceutical Society, we presented on PSI's approach to risk management and the development of our Risk Management Framework.
24 November	We attended the EU series event 'A European Health Union for the future – preparing for the next cross-border health emergency' hosted by the Department of Health, in collaboration with the Department of Foreign Affairs, as part of EU50. The EU50 series celebrates 50 years of Ireland's EU

	membership, reflecting on the impact of EU membership on Ireland and looking forward to the future of the Union.
30 November	We attended the Medical Council stakeholder group meeting on strategies to address overprescribing of controlled drugs (this stakeholder group includes representatives from the Medical Council, HSE, HPRA, Department of Health, the PSI and ICGP)
30 November	We attended the 5th meeting of the HSE Community Pharmacy Planning Forum. During the pandemic, the Group was established to examine the operational and clinical challenges confronting community pharmacists. The work of the Forum has now transitioned to discussing the strategic direction of community pharmacy.
7 December	We attended a QQI Validation and Professional / Regulatory Approval event attended by HEI's, validation and accreditation evaluators, and professional and regulatory bodies. The purpose of the event was to work collectively to review current QQI programme validation templates with a view to make them more fit-for-purpose for providers, expert panels and QQI and to increase the focus on those validation criteria and aspects of programmes most critical to quality and sustainability.
8 December	We held our biannual meeting with the Schools of Pharmacy, including APPEL
13 December	Meeting of the Health and Social Care Regulators Forum: agenda items to include workforce matters, FTP alignment, Department of Health's healthcare complaints and patient safety incidents policy development.

Public consultation submissions:

- **National Risk Assessment 2023/24**

In November, at the request of the Department of Health, we input into the development of the National Risk Assessment (NRA) for 2023/2024 overseen by the Department of An Taoiseach. The National Risk Assessment is a collaborative exercise to identify and discuss significant risks facing the country and feeds into more detailed risk management processes by individual departments and agencies. We reviewed the strategic risks and provided comments on the areas relevant to our remit.

- **Medical Council public consultation on the revised draft standards for medical education and training**

In October, on invitation from the Medical Council, we provided a response to the Medical Council's public consultation on the revised draft standards for medical education and training.



Advancing the Role of Pharmacy and Pharmacists in the Future Integrated Healthcare System

Key updates

Emerging Risks to Future Pharmacy Workforce project

Following successful completion of a competitive tender process, Grant Thornton was appointed in September as the external contractor to assist PSI with this project, which is due to run across 2022 and 2023, and is examining emerging risks to the future pharmacy workforce, with a focus on patient-facing roles within community and hospital pharmacy.

Key deliverables for the project being delivered with support from Grant Thornton are:

1. Complete desktop research to provide an overview of the current landscape relating to sectoral workforce planning, including a literature review to identify challenges and opportunities. This is due for delivery by the end of December.
2. Identify the approaches, models, and strategies for managing sectoral workforce planning in patient-facing pharmacy roles in comparator countries.
3. Design a workforce survey for the purposes of establishing a baseline picture of the current pharmacy workforce. The survey was issued on 23 November and is open until 18 December.
4. Carry out an analysis of the survey's results, and report on the findings of this analysis.
5. Facilitate meetings with the Working Group established by the PSI.¹ Early engagement meetings have taken place with all the organisations and representative bodies on the Working Group and the outputs shared with Grant Thornton for inclusion in their analysis. The first meeting of the Working Group took place on 8 December in PSI House – a workshop-style session – and was well-represented by the organisations invited to join the group.
6. Facilitate meetings with five individual focus groups established by the PSI representing pharmacists from different practice settings and fifth year pharmacy students. Following an expression of interest process, 37 responses were received and five focus groups have been established. The meetings of the focus groups will take place in January, facilitated by Grant Thornton and supported by PSI staff. The outputs of the Focus Group Meetings will be provided

¹ The Terms of Reference for the Working Group can be summarised as follows: (i) Work with the PSI project team and relevant external consultants at key phases throughout the project to advise on risks impacting/which could impact the continued and future availability of a professional pharmacy workforce.; (ii) Share knowledge from Working Group members' own area of expertise on proposed or anticipated strategies for the role of pharmacists within the future integrated health system, discussing their impact and associated demands on the workforce.; (iii) Consider and comment on outputs from other data sources (e.g. PSI Workforce Survey).; and (iv) Consider and comment on proposed strategies and recommendations to address the future workforce demands.

to the Working Group at their subsequent meeting for consideration. This will ensure that the Working Group has a clear picture in terms of the issues facing frontline pharmacists, in a variety of practice settings, and at different stages in their careers.

7. Formulate and present a standalone draft Workforce Intelligence Report, informed by the previous activities.

The project's deliverables, culminating in the final report, will establish a baseline view of the current workforce for the PSI and our stakeholders and identify opportunities, challenges and suggested recommendations to address the future pharmacy workforce needs.

Following a useful discussion at the December meeting of the Regulatory and Professional Policy (RPP) Committee, we are planning to hold a dedicated meeting of the committee in early 2023 to discuss the various outputs of the project in order to capture input and recommendations of the committee.

We also intend to hold a workshop on this issue for Council at its Development Day session at the end of March 2023.

We expect to have a draft report to present to Council at its April 2023 meeting.

Review of the CPD Model for Pharmacists

The review of the CPD model for pharmacists is being carried out using independent, external support. Following successful completion of a competitive tender process Mazars has been appointed. The project kick-off meeting has been held and contracts have been signed.

Summary of the key deliverables of the external contractor are:

1. To identify the key drivers that will inform the future development of PSI's CPD model and the setting of our key objectives and responsibilities in the further development of that CPD system
2. To examine and evaluate the effectiveness of current CPD governance and management structures in the performance and delivery of the CPD system as it exists
3. To make recommendations as to how the current CPD model can be adapted, changed or improved to meet the PSI's key objectives and responsibilities in the further development of the CPD system for pharmacists
4. Examine the viability, resourcing and sustainability, of any proposed model, giving due consideration to the size of the Register of Pharmacists and the size of the Register of Retail Pharmacy Businesses

A report will be drafted taking into consideration the outcome and recommendations from the review.

We expect to present a draft report to Council at its June 2023 meeting. The revised model incorporating agreed changes (if any) will be progressed in 2023.



Evolving a More Effective Regulatory Model for Community Pharmacies

Key updates

Review of COVID-19 legislation

The PSI met with national stakeholders to discuss the revocation of the COVID-19 emergency provisions as set out in S.I. 98 and S.I. 99 of 2020. Following a Department of Health request, in August 2022 the PSI submitted a joint statement that was prepared in conjunction with, and agreed with, the Medical Council in relation to the revocation of the COVID-19 emergency provisions as set out in S.I. 98 and S.I. 99 of 2020. This joint statement set out an underpinning rationale to support the introduction for consideration by the Department of an enabling mechanism in the legislation to allow a pharmacist to supply a controlled drug in certain emergency circumstances, either at the request of a prescriber or a patient, where in the opinion of the pharmacist it is unreasonable for the patient to obtain a new prescription for that controlled drug and that, it is safe, appropriate and necessary for the continued treatment of the patient for the emergency supply to be made.

During subsequent discussions, the Department requested PSI to develop a risk assessment to underpin the joint policy position statement, in particular relating to introducing emergency supply provisions for controlled drugs on a more permanent basis, once the COVID-19 emergency provisions as set out in S.I. 98 and S.I. 99 of 2020 are revoked. The risk assessment considers the legislative changes from the perspective of pharmacists only and was submitted to the Department for its consideration in November 2022.

Third Country Qualification Recognition (TCQR) Route

A project implementation plan to give effect to the operationalisation of the revised TCQR process, as approved by Council in October, has been developed. The plan identifies significant procurement activity and work has commenced on developing the basic requirements for examinations and adaptation period management. Work is also being undertaken in conducting a trial of Phase 2 of the process, ie the Holistic Assessment.

Meanwhile, plans have been developed for the public consultation on the revised PSI (Registration) Rules that Council approved for that purpose in October. A copy of the proposed revised rules has also been provided to the Department of Health. The public consultation will take place at the start of 2023. Work is also ongoing on the fees structure to underpin the revised TCQR route and this will be presented to Council in Q1 2023.

Veterinary Medicinal Products (Medicated Feed and Fertilisers) Regulation Bill 2022

The PSI submitted its detailed comments to the Department of Agriculture, Food and the Marine (DAFM) on the draft Veterinary Medicinal Products (Medicated Feed and Fertilisers) Regulation Bill 2022 on 1 December. The DAFM's invitation to the PSI end October to submit formal comments on the draft Bill was to be welcomed. PSI has previously submitted our detailed comments on the draft Bill via our line unit in the Department of Health (DOH) end June and had discussed its concerns in a meeting with the DAFM early September. The Bill was to be brought to Cabinet in early December but reports now indicate that the matter will not be progressed until later in Q1 2023.

PSI will continue to engage with both the DOH and the DAFM on this important legislative change.



Building our Capability and Performance as a Regulatory Organisation

Key updates

Skills Building for Disciplinary Committees & Council

The PSI is committed to ensuring that the Council and Disciplinary Committees are provided with relevant training opportunities to support them in the exercise of their statutory functions regarding fitness to practise, and to ensure that they continue to develop the appropriate skills required for those functions.

On 20th October 2022, the Legal Affairs and Fitness to Practise Manager delivered training to the Council of the PSI along with Fieldfisher LLP, on the relevant case-law and legal principles regarding statutory applications to suspend the registration of a registered professional on an interim basis pending resolution of a fitness to practise process, with particular focus on recent case-law and the legislative provisions relating to pharmacists and retail pharmacy businesses.

On 24th November 2022, a training session was delivered to the Council and separately, to a significant portion of the three Disciplinary Committees, dedicated to exploring the impact of cognitive biases on individual and group decision-making, particularly in the context of Equality, Diversity and Inclusion principles, and suggested interventions which can be adopted to mitigate, insulate and remove these biases. This training was delivered by Mr. Leslie Cuthbert, himself an experienced tribunal judge and quasi-judicial decision-maker and specialist trainer to public sector and government bodies and regulatory bodies in relation to decision-making, investigations and fair procedures. The training was particularly well received by Council and Committee members and a mop-up training session will be delivered early next year to those Disciplinary Committee members who could not attend the session on 24th November.

Business Transformation Project (BTP) Update and 'New Ways of Working'

Work with our technology partner is proceeding to ensure the next phase (Phase 1.1) of the BTP will be deployed mid Q1 2023. We have made changes to the 'continued registration' (CR) online experience for individuals which is starting to see practical improvements e.g. 15% improvement on same period last year when measuring timeframe from CR submission through to CR approval. We continue to gather feedback from our registrants/applicants and also PSI staff as we seek to further enhance the online registration portal.

One aspect of the next Phase – 1.1 – is to join up the public register with outcomes from the complaints process; another is to extend the register to include what is termed the 'Internet Supply List'. In parallel to work being done to ensure the next phase (Phase 1.1) of the BTP will be deployed mid Q1 2023, we are also progressing with work on improving the experience for members of the

public interacting with the regulator. This will be an area of focus for our digital transformation journey through 2023.

At the end of November all staff participated in a half-day development workshop run by the UCD Innovation Academy to serve as an introduction to design thinking and innovation for the PSI. This workshop coincided with the launch of the Government's Design Principles for Government in Ireland (see page 3 above) and allowed for PSI staff to understand how these principles can be practically applied to our regulatory work.

Strategic HR Update

• Workforce Planning and Recruitment

The following positions were filled since the last Interim Registrar's Report:

- Finance and Support Services Manager (Grade VIII – Career Break Cover)
- Regulatory Executive (Executive Officer Grade)
- Finance and Business Support Officer (Higher Executive Officer – HEO – Grade)
- The new Registrar will take up office on 9 January 2023

Recruitment will commence in early 2023 for the following roles:

- HR and People Development Officer (HEO grade)
- Programme Delivery and Innovation Manager (Assistant Principal Officer – APO – Grade)
- Programme Delivery and Innovation Analyst (HEO Grade)
- Quality Assessor (Engineer II Grade)

At the request of the Department of Health (DOH), PSI has prepared a detailed document identifying 7 priority posts from the 11 posts approved by Council for consideration for sanction by the DOH.

Additionally, two other business cases are in the process of being finalised for submission to the DOH to seek sanction to recruit:

- Head of Strategic Policy and Communication (Chief I Pharmacist grade 2-year fixed-term contract to cover for a career break)
- Quality Assessor II – Pharmacy Services (Grade IV to be converted to an Engineer III permanent contract)

• Blended Working

The Blended Working Policy has been approved by the Executive Leadership Team (ELT) for roll-out to all staff, with the status quo remaining of staff required to work a minimum of 2 days a week onsite at PSI House (staff engaged in fieldwork have different considerations). The application process will commence in January 2023 as will the at-home workstation assessments.

Our first all-staff development day since pre-COVID-19 took place end November focussed on design thinking and innovation (see BTP section above).

An in-house training session on 'Managing Blended Working Teams' took place on 6 December 2022. This session was designed and tailored for all individuals with people management responsibilities.

- **HR Information System (HRIS)**

The procurement process for the HRIS system concluded successfully and work has commenced on the system set-up and migration of current data. The system will be able to facilitate employee data, leave management, flexitime/clockings, performance management and learning and development management. The implementation of this new system will deliver efficiencies for the organisation and improve reporting.

- **Equality, Diversity and Inclusion**

Our Equality, Diversity and Inclusion Working Group invited pharmacist and researcher, Aaron Koay, to present to PSI staff in October on the topic of 'Racial justice in healthcare practice, policy and education: Pharmacy and beyond'.

Procurement activity update for contract values in excess of €25k:

Service/goods to be Procured	Current Status
Website Re-Design Development, Hosting and Support services	The vendor withdrew from entering into a contract with PSI on 21 July 2022. As the procurement has now been deemed to be unsuccessful, direct market engagement is currently in progress. It is expected to conclude contract formalities in January 2023.
Emerging Risks to Future Pharmacy Workforce project	COMPLETE. Contract signed on 15 November 2022.
Internal Audit Services	COMPLETE. Contract signed on 4 November 2022.
CPD Model Review Pharmacists	COMPLETE. Contract signed on 2 December 2022.
Procurement Consultancy Services	OGP Framework drawdown published on 11 November 2022 with a closing date of 9 December 2022.

Appendix 1 – Statistical Summary

Complaints and Fitness to Practise (figures as of 8 December 2022)

For the purposes of this appendix, please note that references to '*last report date*' refers to the Interim Registrar's Report submitted for the Council meeting on 6th October 2022

Complaints for Screening Committee (Preliminary Proceedings Committee – PPC)

Total new complaints received year to date	52
New complaints received since last report date	10
Total open active complaints*	56
Complaints considered by PPC since last report date **	15

* This figure may include complaints received prior to 2022 which are still being processed

**These complaints were heard over 3 meetings. 40% of these complaints met the KPI of the PPC decision within six months from the date of receipt of complaint to the date of the final PPC decision.

Fitness to Practise

Inquiries

Total heard year to date *	17
Heard since last report **	11
Complaints being investigated/prepared for hearing	36

* 3 of which were opened but adjourned until Q1 2023 and 7 of which involved complex matters which delayed the scheduling. 59% meet the KPI of the inquiry being heard within 18 months from the date of referral by the PPC to a Committee of Inquiry.

** Of the 11 inquiries heard since last report, 4 took place onsite at PSI House, 5 took place remotely, and 2 took place in a hybrid format. Nine (9) inquiries were before the Professional Conduct Committee (PCC) and two (2) were before the Health Committee (HC).

Mediation

Total referrals to mediation since last report	0
Total referrals pending mediation	1
Held year to date	1

Sanction Hearings/ Undertakings/Dismissals/Applications before Council*

Heard since last report*	3
Heard year-to-date*	14
Sanction hearings/undertakings being prepared for Council *	7

*per registrant

High Court Sanction Confirmation Hearings

Heard year to date	1
Cases being prepared for High Court confirmation	0

Appeals

Heard year to date	1
Cases being prepared for High Court appeal	0

Call-Overs and Other Applications Before Committees of Inquiry

Callovers heard year to date:	
(a) Professional Conduct Committee	(a) 4
(b) Health Committee	(b) 5
Held since last report date	(a) 1
(a) Professional Conduct Committee	(b) 1
(b) Health Committee	

The next PCC and HC Callovers are to be scheduled for March 2023

Interim Suspension Applications

Applications heard by Council year to date	1
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Prosecution

Cases being prepared for District Court Prosecution	2
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Professional Registration (figures as of 7th December 2022)

Route/ Application Type	Applications Received 2022 to date	Applications in Process (including applications received in previous years)
Third Country Qualification Recognition (TCQR) – excluding UK	121	209
Route/Application Type		Registrations/ Actions Completed 2022
National Route		155
EU Route		80
Non-National Route (Third Country) – UK only		79
Non-National Route (Third Country) (excl UK)		12
European Professional Card – Establishment of Service (Qualification Recognition)		9
European Professional Card – Temporary & Occasional Provision of Service		0
Voluntary Cancellations from Register		115
Involuntary Cancellations from Register		22
Restorations to Register following Voluntary Cancellation		30
Restorations to Register following Involuntary Cancellation		3
Certificates of Current Professional Status issued		61
IMI Alerts (Internal Market Information) issued by PSI		5

Retail Pharmacy Businesses

Registration of Retail Pharmacy Businesses – numbers as at 7 th December 2022	
Number of Registered Retail Pharmacy Businesses	1981
Retail Pharmacy Business Openings by Type	New Openings: 17 New Openings (Change of Ownership): 58 New Openings (Permanent Relocation): 5 Total = 80
Retail Pharmacy Business Cancellations by Type	Voluntary Cancellations (Closure): 18 Voluntary Cancellations (Permanent Relocations): 5 Voluntary Cancellations (Changes of Ownership): 58 Total = 81
Number of Changes in Supervising and Superintendent Pharmacists	422

Internet Supply	
Number of Pharmacies on Part A	175
Number of Non-Pharmacies on Part B	157

Regulation of Retail Pharmacy Businesses (figures as of 07 December 2022)

Inspection Activity 2022	
Total number of Inspections (commenced February 2022 following COVID-19 government advice)	108
Number of registration-related Inspections	12
Number of pharmacy inspections Re-inspections – including re-inspections following the Registrar’s decision under Section 71(1)(d)	3

Concerns

Total new concerns received year to date	110
New concerns received since last report date	27
Concerns reviewed since last report date	34
Open concerns	5

Investigation Activity 2022 (Part 7 of the Pharmacy Act / Inspection & Enforcement)		
No. of investigations open	No. of investigations initiated since the last Council meeting	No. of investigations closed since the last Council meeting
13	0	1
Investigation Activity 2022 (Section 67) – <i>Interviews / Statements / Pharmacy Visits</i>		14