

Report of the Registrar Council Meeting 5th October 2023



Highlights from the Registrar

Launch of the Workforce Intelligence Report

Following approval of the Workforce Intelligence Report by the PSI Council in June, preparations for publication of the report took place over the summer months. This culminated in a successful launch event taking place in the Department of Health on Monday 25 September. The report was officially launched by Mr. Robert Watt, Secretary General of the Department of Health, and the launch event was well attended by a broad cross-section of the pharmacy and health sector. There was significant media coverage of the event, as outlined later in this report.





Approval of the HSE's National Immunisation Office (NIO) training in respect of Comirnaty® Omicron XBB.1.5 30mcg and Comirnaty® Omicron XBB.1.5 10mcg (For children aged 5-11 years),

On 12 September, the Registrar approved the NIO training in respect of Comirnaty® Omicron XBB.1.5 30mcg and Comirnaty® Omicron XBB.1.5 10mcg (For children aged 5-11 years), as training for the purposes of Regulation 4F(b) of the Medicinal Products (Prescription and Control of Supply) (Amendment)(No.7) Regulations 2020 (S.I. No. 698 of 2020) to facilitate pharmacist vaccinators in supplying and administering these vaccines, as part of the COVID-19 national vaccination programme. These vaccines will be the main COVID-19 booster vaccines used in the upcoming Autumn/Winter Vaccination campaign, based on recent recommendations from the National Immunisation Advisory Committee (NIAC).

Children's LAIV (Live Attenuated Influenza Vaccine) Programme

A key public health priority is to improve the uptake of the influenza vaccine in children aged 2-12 years, and to achieve this a number of initiatives have been planned by the NIO for the upcoming vaccination season, including the delivery of the LAIV influenza nasal vaccine in primary school settings.

The NIO are encouraging community pharmacies to link with local primary schools to provide on-site LAIV to children. We have been engaging with the NIO on this matter and have reviewed and updated

our vaccination guidance documents to align with HSE guidance in these settings and to support the safe involvement of pharmacists in this important public health initiative.

APPEL 4th-Year Pharmacy Student Placements

The PSI recently welcomed two 4th-year pharmacy students, Ciara, and Laura, for their experiential learning placements from 28 August 2023. The students will undertake their 4 months' experiential learning across various business areas of the PSI as part of their MPharm qualification.

Ongoing Regulatory Work Programmes in 2023

Activity	Outputs	Update
Implement the revised Core Competency Framework (CCF) for pharmacists.	Roadmap in place for the implementation of the revised CCF for pharmacists in 2023.	Engagement with the Irish Institute of Pharmacy (IIOP) regarding the implementation of the revised CCF continued over the summer break. On 13 September, a webinar on the implementation of the CCF for pharmacists was hosted by the IIOP and the PSI presented on the changes to the CCF. The IIOP will continue with this work into the Autumn. A series of roads shows have been organised covering topics such as how to self-assess against the revised framework, using objective evidence, feedback and reflective practice. The conclusion of the Autumn roadshows will bring to an end this piece of regulatory work. An implementation plan was agreed with the Schools of Pharmacy in Q2 of 2023 and PSI will continue to liaise with the Schools in this regard.
Operationalise our Regulatory Risk Statement as a key tool in managing incoming information, intelligence, and strategic learning to help identify and respond to risks to	 New risk reporting mechanisms developed and operating by yearend. Continued development of the joined-up approach to identifying and 	The work in relation to the continued development of the joined-up approach to identifying and addressing regulatory risk is progressing within the Community Pharmacy Assurance Business Area.

patient safety and/or serious concerns as to the quality of community pharmacy services.	addressing regulatory risk.	
Operationalise the revised Third Country Qualification Recognition (TCQR) route process leading to registration as a pharmacist.	Revised route commenced Q1 2024	The PSI project team is in the process of implementing the revised TCQR route, with the current focus being on developing the holistic assessment component of the new process, an expression of interest for an external panel of assessors and on designing a new approach to the adaptation placement system which will see placements managed for the applicants on behalf of the PSI, through a quality assured process. PSI conducted a market sounding exercise on the provision of an adaptation placement service for the revised TCQR and discussions are still progressing as part of this exercise with potential providers. Statutory Rules (S.I. No 452 of 2003) supporting the revised TCQR route were signed by the Minister for Health in June.

Communication and Stakeholder Engagement Updates

Overview of meetings attended by the Registrar and PSI staff		
August-September	We continue to contribute to the National COVID-19 Vaccination Programme – Pharmacy Workstream Working Group. Discussions at these meetings focus on the ongoing work relating to pharmacists' involvement in COVID-19 booster and seasonal influenza vaccination programme.	
26 June 2023	We met with colleagues from the Department of Health, and the Central Statistics Office, to be briefed on progress regarding on-going health data initiatives including the alignment of the legislative and non-legislative frameworks which will:	
	(a) underpin the use of big data, data collection, coding schemes, and data analytics in the health information system (HIS),	
	(b) drive future resource allocation within the integrated healthcare system, (Sláintecare), and,	
	(c) provide an evidence base for health policy development.	
30 June 2023	PSI staff attended a meeting of the 'Preventing Paracetamol-Related Intentional Drug Overdose' Working Group. The overall aim of the Group is to collaborate on actions to prevent paracetamol-related intentional drug overdose by optimising adherence to existing legislation that limits access to paracetamol.	
5 July 2023	We held our first biannual meeting of 2023 with the three Schools of Pharmacy and APPEL.	
5 July 2023	We attended the launch of the Practitioner Health Matters Annual Report (2022).	
5 July 2023	We met with officials from the Department of Health and the IPU to discuss matters concerning pharmacist workforce shortages and solutions.	
6 July 2023	We met with the Department of Health to discuss a number of policy-related matters.	
10 July 2023	PSI staff, along with the Registrar and the PSI Council President, met with Minister for Health, Stephen Donnelly, and his officials in the Department of Health, to discuss the future scope of practice and outputs from the Workforce Intelligence Report.	
11 July 2023	We hosted two professors from the Faculty of Pharmacy at the University of Belgrade for a meeting in PSI house. They were visiting the School of Pharmacy and Pharmaceutical Sciences in TCD and were interested to understand the accreditation process and the arrangements in place for the	

management and oversight of experiential learning placements as part of the MPharm programme. 12 July 2023 We participated in a meeting hosted by the HSE ePrescribing Project Team to review and examine processes in relation to current prescribing and dispensing workflows. 12 & 13 July 2023 We attended three focus groups which were facilitated by Mazars with community pharmacists, hospital pharmacists and pharmacists working in 'other' settings including academia, industry, and regulation as part of our strategic project on the Review of the Continuing Professional Development (CPD) Model for Pharmacists. 13 July 2023 We attended the online launch of the FtP Emotional Phone Support Service by NMBI. We held our quarterly operations meeting with the Irish Institute of Pharmacy (IIOP). We spoke at an APPEL Appreciation Event delivered by LloydsPharmacy. We met with consultants from Indecon, who are supporting the Department of Health with the delivery of a Health and Social Care Workforce Planning Strategy, Action Plan, and Planning Projection Model. This project is cofunded by the EU Commission. The purpose of the meeting was to provide Indecon with an update on the outputs of the Emerging Risks to Future Pharmacy Workforce Project. We met with a group comprised of representatives from the HSE, HPAI and Schools of Pharmacy, who provided an update on the new hospital pharmacy career structure, particularly in relation to the new grade of Advanced Specialist Pharmacists for HSE pharmacists. We attended the first meeting of the Expert Taskforce to Support the Expansion of the Role of Pharmacy. We attended the Medical Council Overprescribing Working Group meeting. The Group is currently working on a submission to the Department of Health examining the impact of the overprescribing of benzodiazepines, 2 drugs, and pregabalin in Ireland. This stakeholder group includes representatives from the Medical Council, HSE, HPRA (Health Products Regulatory Authority), Department of Health, the PSI, and ICGP (Irish Co		
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	aligned with the implementation of the eHealth Strategy for Ireland. The last meeting was held on 22 June.
1 st September 2023	We attended a meeting of the Medicines Criticality Assessment Group concerning a shortage of Ozempic 1mg.
6 September 2023	The ELT met with representatives from the DoH for the second governance meeting of the year. Topics discussed were progress on the implementation of the Service Plan 2023, Performance Delivery Agreement 2021-2023, Prescription and Control of Supply Regulations, Delineation and Superannuation. Minutes from the March meeting are available on your iPad.
7 September 2023	We met with RCSI and the IIOP to discuss contractual matters and areas of strategic importance.
8 September 2023	We attended a meeting of the Medicines Criticality Assessment Group regarding Ozempic.
11 September 2023	We met with representatives from the DoH in relation to the Expert Taskforce.
12 September 2023	We attended the second meeting of the Expert Taskforce to Support the Expansion of the Role of Pharmacy.
12 September 2023	We met with the National Immunisation Office (NIO) to discuss the involvement of pharmacists in delivering the Live Attenuated Influenza Vaccine (LAIV) in Schools for the Autumn/Winter vaccination campaign.
13 September 2023	We delivered a webinar for pharmacists hosted by the IIOP on the development of the new Core Competency Framework and its implications for pharmacists' CPD.
15 September 2023	We met with the National University of Ireland, Galway (NUIG) regarding the development of their MPharm programme following the announcement by the Minister regarding the expansion of capacity for Pharmacy training in Ireland.
18 September 2023	We attended a registration forum meeting with other healthcare regulators (Dental Council, NMBI, CORU in attendance) to discuss topical issues of note, including:
	 UK Qualifications – deviation in standards? Concern over fake documents
	Language Competency requirements
19 September 2023	We attended the Global Sepsis Summit in Dublin Castle.

25 September 2023	We launched the Workforce Intelligence Report in the Department of Health. This was the culmination of the Emerging Risks to Future Pharmacy Workforce project.
25 September 2023	We attended the third meeting of the Expert Taskforce to Support the Expansion of the Role of Pharmacy.
26 September 2023	We attended the launch of the RCSI Strategy 2023-2027, Innovating for a Healthier Future.

Recent communication/engagement with our registrants and members of the public

- We are currently undertaking a regulatory review of the administration of medicines, in particular, injectable medicines, by pharmacists in community pharmacies. To support this review, between July and September, we carried out short anonymous surveys with pharmacists and the public. We received 614 responses from the pharmacist survey and 159 from the public survey. Analysis is now underway on the data captured.
- In early August, we sent communications to all registrants on the Internet Supply List, Part A, and Part B, notifying them that the Internet Supply List was moved to PSI's online registration portal and providing relevant information and user guides.
- In early September, we sent a communication to all registrants notifying them of an upcoming survey that is related to the work of the 'Preventing Paracetamol-Related Intentional Drug Overdose' Working Group, of which PSI is a member.
- In September, we sent a communication to relevant account holders on PSI's online registration portal notifying them about the new feature to appoint a new Superintendent Pharmacist for more than one pharmacy with just one application.
- In mid-September, we sent an email to all registrants inviting them to register for the PSI Roadshow Events taking place in October.

Recent communication/collaboration with other regulatory and public authorities

 On 1 September, we issued a communication to all registrants in relation to the availability of semaglutide (Ozempic®), which was developed in conjunction with the Department of Health, HPRA, Medical Council, and HSE.

Public consultations and other submissions

• In July, at the request of the Department of Health, we reviewed and provided feedback on a proposed draft statutory instrument to amend certain provisions of the Medicinal Products (Prescription and Control of Supply) Regulations 2003 (as amended).

Other external communication

 We issued a Press Release with support from Káno Communication, our external PR advisors, in relation to the launch of the Workforce Intelligence Report. The Registrar was subsequently interviewed on RTÉ's DriveTime radio programme and by Newstalk. There was coverage following the Press Release in the Irish Times, Irish Independent, and Irish Examiner newspapers.



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

Key updates

Emerging Risks to Future Pharmacy Workforce

In line with one of the commitments for the PSI in the Workforce Intelligence Report, we are engaging with Grant Thornton to deliver the Workforce Survey Analysis Report 2024, building on the baseline view of workforce data established through the survey conducted last year as part of the Emerging Risks to Future Pharmacy Workforce project. An adapted survey will be issued to all pharmacists later this year.

Review of the Continuing Professional Development (CPD) Model for Pharmacists

Work continues on the review of the CPD model for pharmacists, with independent external support from Mazars. Three focus groups were held in July with pharmacists from different practice areas, to gather feedback from the pharmacy profession on potential changes, adaptations, or improvements that could be made to the current CPD model.

The project team and project steering group are currently providing feedback on the latest draft of the final report from Mazars received on 25 September, which sets out the outcomes and recommendations arising from the review. We expect to present a draft final report to Council before the end of the year.

Developing a CPD Model for Pharmaceutical Assistants

Work on the project tasked with proposing a continuing professional development (CPD) model for pharmaceutical assistants has continued. Mazars, who provided external support on this project, presented a report recommending a proposed CPD model. The report was approved by Council at its meeting on 22 June. Since then, the report has been circulated to The Pharmaceutical Assistants Association (PAA) and to the stakeholders who participated in the review. The PSI is scheduling a meeting with the PAA to discuss the development of an implementation plan.

Stakeholder Engagement with DoH and HSE on Sláintecare implementation and pharmacy integration

The Department of Health has established an Expert Taskforce to oversee the planned expansion of pharmacy services. The Taskforce, which has met on three occasions to date, includes representatives from the HSE, the Irish College of General Practitioners, and academic/training bodies. The PSI is represented on the Taskforce by the Registrar. An internal working group has been established within the PSI to coordinate our response and any input required to progress the objectives and policy direction set by the Taskforce.

Considering this, it has been decided that the 'Stakeholder Engagement with DoH and HSE on Sláintecare implementation and pharmacy integration' project has been superseded by the establishment of the Expert Taskforce, and this will be reported on instead through the Regulatory and Professional Policy Committee for the remainder of 2023.



Evolving a More Effective Regulatory Model for Community Pharmacies

Key updates

Falsified Medicines Directive

Falsified Medicines Directive compliance is continuing in an upward trend. Compliance has been consistent in the busier weeks (first and last week) of the month, with the middle weeks now starting to trend upwards. For the week beginning September 4th, 2023, the decommissioning rate was 64.6% and prior to the August bank holiday, the decommissioning rate was 68.3%. The Irish Medicines Verification Organisation (IMVO) is providing support to pharmacies that are verifying but not decommissioning and will be shortly extending this support to pharmacies that are verifying but have low decommissioning rates.

Advance Reform of the Pharmacy Act project

As agreed with the Department of Health earlier this year, the next steps in the Advance Reform of the Pharmacy Act project involve PSI commissioning an in-depth evidence review on the regulation of retail pharmacy businesses, which will inform the development of evidence-based policy proposals for reform in this area.

We are continuing to progress a preliminary market consultation exercise to support the overall tendering process and are engaging with the Health Research Board (HRB) regarding the development of research questions which will inform the evidence review process.

Autumn Roadshows

We are currently planning a series of roadshows in various locations across Ireland in October. The aim of the roadshows is to provide clarity for registrants on topical issues such as pharmacy governance roles, the Workforce Intelligence Report, and on Fitness to Practice matters.

An initial invite to register was circulated to all registrants in September and a good response rate has been received to date.

Stakeholder Engagement on patient safety and quality initiatives

We are currently developing guidance to help, support, and assist pharmacists on the roles and responsibilities of those in governance roles, and we aim to provide clarity to registrants on the legislative interpretation of 'wholetime charge' with respect to the role of Supervising Pharmacist. Work is progressing well on the development of this guidance which we aim to have delivered by end of Q4.

PSI Vaccination Guidance

The PSI Vaccination guidance documents are currently being updated for the 2023/2024 vaccination season. We are finalising the guidance and hope to have it published and circulated to registrants in the coming weeks to support pharmacists in providing a safe vaccination service. As the World Health Organisation has determined that COVID-19 is an established and ongoing health issue that no longer constitutes a public health emergency, we have archived the *'Practical Guidance when Providing a Pharmacy Vaccination Service during COVID-19'*.



Building our Capability and Performance as a Regulatory Organisation

Key updates

Strategic HR Matters

In our ongoing efforts to ensure effective human resource management and organisational development, we have made significant progress since the last report. Here is an overview of the key developments, including recent workshops, upcoming training plans, and our focus on health and safety for Q3 and Q4:

Strategic Workforce Planning

Completed competitions since the last report, two open recruitment competitions have been successfully completed:

- Head of Strategic Policy, Research and Communication (18-month fixed-term contract to cover career break)
- Regulatory Solicitor Permanent Engineer II grade post

We currently have the following campaigns in train for open recruitment, which include 6 new posts for which sanction was received from the Department of Health in 2023:

- Inspector (Authorised Officer) Pharmacy Services (Engineer II Grade), re-advertisement for creation of a panel and an immediate vacancy for a 3-year fixed-term contract (currently at the interview stage)
- 4 x Associate Inspectors (Authorised Officers, Engineer III Grade), also in the interview stage.
- Professional Standards Officer (Engineer II Grade) to be re-advertised.
- Finance and Support Services Executive (Executive Officer Grade) to be re-advertised.
- Investigations Manager (Assistant Principal Officer Grade)
- Business Support Services Assistant (Clerical Officer Grade)
- Strategic Policy, Research and Projects Coordinator (Higher Executive Officer Grade)
- Five posts submitted to the Department of Health in 2022 remain to be sanctioned and will be re-submitted before the end of 2023 for further consideration by the Department.

Workshops and Training

In the third quarter of this year, we conducted a workshop for all staff on stress management titled "Positive Mental Health at Work: Building Strength for the Future," which was facilitated by Aware.

Additionally, our Safety Officer attended three-day Safety Officer and Coordinator training. For the remainder of the year, our focus will be on health and safety. We are committed to ensuring that all safety training is completed by the end of 2023. This includes training in the following areas:

- 1. Performance management
- 2. First Aid
- 3. Fire Safety
- 4. Use of the Evacuation Chairs

Employee Well-Being

Our Employee Well-Being Strategy is in development and is expected to be completed and ready for staff consultation shortly. This initiative, provided for in our HR Strategy, reinforces our dedication to a productive and supportive work environment, ensuring the well-being of our staff.

Business Transformation Programme (BTP) Update

Phase 1.1 was delivered successfully on August 21st. This was delivered significantly behind the original schedule set out and within the budget parameters set out. Phase 1.1 joined up the public Register with outcomes from the complaints process; and extended the Register to include what is termed the 'Internet Supply List'. This provides both an online registration platform for completing applications and a comprehensive, searchable online internet supply list, akin to the other PSI Registers.

Other functionality items to note from Phase 1.1 include:

- Functionality relating to outcomes from Fitness to Practice (FtP)— now the public Register integrated with outcomes from FtP.
- Functionality allowing one application to apply where a Superintendent Pharmacist is associated with several pharmacies.
- Functionality to improve the online fee payment experience for all applicants/registrants.

PSI is currently working with an independent third party to complete an assessment of the proposed approach and associated effort estimates for our next phase of work, Phase 2 Complaints, Concerns, and Queries. Phase 2 aims to improve the experience for members of the public interacting with the regulator. A broader review of the PSI/Codec commercial relationship will be completed in Q4 2023.

EFQM Update

Work is ongoing to embed EFQM tools into planning and continuous improvement initiatives through engagement with staff e.g., we are incorporating EFQM tools into the health cards from 2024 to assist with project planning.

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

Service/Goods to be Procured	Current Status
Website Re-Design	COMPLETE. Contracts signed effective 12 th September 2023.
Development, Hosting and	
Support services	
Third Country Qualification	COMPLETE. Contracts signed effective 4 th September 2023
Recognition – Equivalence Exam	
(for existing TCQR route)	
Third Country Qualification	Procurement planning approach ongoing with external
Recognition – Equivalence Exam	procurement experts.
(for existing TCQR route and	
new route)	
TCQR new route - adaptation	Discussions are ongoing with external procurement experts on
period support	procurement planning and approach. A Preliminary Market
	Consultation was published and closed on the 10th of July.
	Consideration of outcome of this exercise is ongoing and next
	steps in development.
Establishment of a panel of	Specifications have been developed by the project team -
Legal Assessors	approach to be progressed with External Procurement Experts
Registration-related printing	Specification for registration-related requirements have been
and fulfilment services (e.g.,	progressed. All other PSI print and design requirements remain to
registration certificates) and	be specified and then be sent to OGP for review.
other print needs	

Appendix 1 – Statistical Summary

Complaints and Fitness to Practise (figures as of 22 September 2023)

For the purposes of this appendix, please note that references to 'last report date' refers to the Registrar's Report submitted for the Council meeting on 13 June 2023.

Complaints for Screening Committee (Preliminary Proceedings Committee – PPC)

Total new complaints received year to date	49
New complaints received since last report date	17
Total open, active complaints*	58
Complaints considered by PPC since last report date**	29

^{*} This figure includes the 37 complaints before Council

Fitness to Practise (as of 22 September 2023)

Inquiries

Total heard year to date *	13
Heard since last report **	6
Complaints being investigated/prepared for hearing	42

^{*1} inquiry not yet concluded. 38% meet the KPI of the inquiry being heard within 18 months from the date of referral by the PPC to a Committee of Inquiry.

Mediation

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

Sanction Hearings/Undertakings/Dismissals/Applications before Council*

Heard since last report*	2
Heard year to date*	9
Sanction hearings/undertakings being prepared for Council *	9

^{**}These complaints were heard over 4 meetings. 83% 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.

^{**4} took place before the PCC and 1 took place before the HC

*Per registrant

High Court Sanction Confirmation Hearings

Heard year to date		2
Cases being prepared for High Cou	rt confirmation	1

Appeals

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

Call-Overs and Other Applications Before Committees of Inquiry

Callovers heard year to date:	
Professional Conduct Committee	3
2. Health Committee	3
Held since last report date.	1
Professional Conduct Committee	1
2. Health Committee	

The next PCC and HC Callovers are scheduled for 05 December 2023

Interim Suspension Applications

Applications heard by Council year to date	1
The production of the same of	-

Prosecution

Cases being prepared for District Court Prosecution	1
 8	_

Professional Registration (figures as of 22 September 2023)

Route/Application Type	Applications Received 2023 to date	, ,
Third Country Qualification Recognition (TCQR) – excluding UK.	115	321
Route/Application Type		Registrations/ Actions Completed 2023 (to 22 September 2023)
National Route		11
EU Route		130
Non-National Route (Third Country) – UK only		81
Non-National Route (Third Country) (excl. UK)		16
European Professional Card – Establishment of Service (Qualification Recognition)		1
European Professional Card – Temporary & Occasional Provision of Service		0
N. I		
Voluntary Cancellations from Register		57
Involuntary Cancellations from Register		21
Restorations to Register following Voluntary Cancellation		6
Restorations to Register following Involuntary Cancellation		2
Certificates of Current Professional Status issue	ed	52
IMI Alerts (Internal Market Information) issued	by PSI	4

Retail Pharmacy Businesses

Registration of Retail Pharmacy Businesses (as of 22 September 2023)		
Number of Registered Retail Pharmacy Businesses	1981	
Retail Pharmacy Business Openings by Type	New Opening: 23 Permanent Relocation: 1 Change of Ownership: 65	
Retail Pharmacy Business Cancellations by Type	Voluntary Cancellations (Closure): 22 Voluntary Cancellations (Permanent Relocations): 1 Voluntary Cancellations (Changes of Ownership): 65 Involuntary Cancellations: 1	
Number of Changes in Supervising and Superintendent Pharmacists. (Numbers as of. (22/09/2023)	Supervising pharmacist changes: 392 Superintendent Pharmacist changes: 67	

Internet Supply Figures as of 22 September 2023	
Number of Pharmacies on Part A 145	
Number of Non-Pharmacies on Part B 166	

Regulation of Retail Pharmacy Businesses (figures as of 15 September 2023)

Pharmacy Inspections 2023		PSI 2023 Service Plan Pharmacy Inspection Key Performance Indicator (KPI)	
Total number of on-site Pharmacy inspection visits to	131	160	
date.			
Total number of registration- related Virtual Inspections to date.	13	20	
Number of pharmacy re- inspections – including re- inspections following Registrar's decision under Section 71(1)(d) to date.	3	0	

Concerns

Total new concerns received year to date	103
New concerns received since last report date	33
Concerns reviewed since last report date	38
Open concerns	14

Investigation Activity 2023 (Part 7 of the Pharmacy Act / Inspection & Enforcement)		
No. of investigations open	No. of investigations initiated	No. of investigations closed since
since the last Council meeting		the last Council meeting
16 3		4
Investigation Activity 2023 (Section 67) – e.g., Interviews /		10
Statements / Pharmacy Visits / Professional Witness		

Information Governance as of 25 September 2023

Freedom of Information

No. of FOI requests	Granted	Handled	Refused
received		outside of FOI	
7	1	3	3 (record did not exist, information already in the public domain and an investigation was ongoing therefore the information couldn't be released).

Data Protection

No. of Subject Access Requests Received	Granted	Refused
2	2	0
No. of Data Breaches	Reported to the Data Protection Commissioner (DPC)	Not meeting the threshold for reporting to (DPC)
5	2	3
Data Transfer Requests	Category: For Research Purposes	Category: IIOP
12	3	9