

Ashley Storrey

██████████
Montmartre, SK ██████████

Dear Madam:

RE: Notice of Discipline Hearing

TAKE NOTICE that the Discipline Committee established in accordance with *The Licensed Practical Nurses Act, 2000* (the "Act") and Bylaws will meet on **August 22, 2017** commencing at 9:30 a.m. at the Executive Royal Hotel, 4025 Albert Street, Regina, Saskatchewan to conduct a hearing into the complaint that you have been guilty of professional misconduct and professional incompetence.

The particulars of your alleged professional misconduct and professional incompetence are set out in Appendix A which is attached to and forms part of this Notice of Discipline Hearing.

AND FURTHER TAKE NOTICE that as a result of this hearing, the Discipline Committee will rule and if the Discipline Committee finds that you are guilty of professional misconduct and/or professional incompetence, the Committee may make one or more of the following orders pursuant to Section 30(1):

30(1) Where the discipline committee finds a member guilty of professional misconduct or professional incompetence, it may make one or more of the following orders:

- (a) an order that the member be expelled from the association and that the member's name be struck from the register;**
- (b) an order that the member's licence be suspended for a specified period;**
- (c) an order that the member's licence be suspended pending the satisfaction and**

completion of any conditions specified in the order;

(d) an order that the member may continue to practise, but only under conditions specified in the order, which may include, but are not restricted to, an order that the member:

(i) not do specified types of work;

(ii) successfully complete specified classes or courses of instruction;

(iii) obtain medical or other treatment or counselling or both;

(e) an order reprimanding the member;

(f) any other order that the discipline committee considers just.

In addition to any order stated above, the Discipline Committee may also order pursuant to Sections 30(2) of the Act:

30(2) In addition to any order made pursuant to subsection (1), the discipline committee may order:

(a) that the member pay to the association, within a fixed period:

(i) a fine in a specified amount not exceeding \$5,000; and

(ii) the costs of the investigation and hearing into the member's conduct and related costs, including the expenses of the counselling and investigation committee and the discipline committee and costs of legal services and witnesses; and

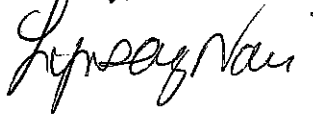
(b) where a member fails to make payment in accordance with an order pursuant to clause (a), that the member's licence be suspended.

Please be advised that you have the right to appear before the Discipline Committee at the time and place mentioned above, either with or without a representative or legal counsel, and to call evidence and make submissions with respect to the complaint, and with respect to any order that may follow thereafter.

AND FURTHER TAKE NOTICE if you do not attend at the hearing, the Discipline Committee may proceed in your absence on proof of service of this notice pursuant to Section 29(5) of *The Licensed Practical Nurses Act, 2000*.

DATED at Regina, Saskatchewan, this 25 day of May, 2017.

Sincerely,

A handwritten signature in cursive script that reads "Lynsay Nair".

**Lynsay Nair, LPN
Executive Director**

APPENDIX A

1. While you were employed at the Montmartre Health Centre (the “Health Centre”) and on or about April 22, 2016, you removed two narcotic pills from compliance packaging, placed those narcotic pills in your pocket and diverted the narcotics to yourself.
2. On April 18, 2016 and while working the day shift at the Health Centre, you were observed to be unsteady on your feet, unfocused and falling asleep.
3. On numerous occasions on April 18, April 21 and April 22, 2016, while working at the Health Centre, you:
 - (a) On multiple occasions, removed narcotic pills from compliance packaging intended for residents and placed those narcotics in your pocket;
 - (b) Failed to make appropriate entries on the Medication Administration Records, as in many cases, the time entries made on the Narcotic Control Sheets did not match the time entries made on the Medication Administration Records;
 - (c) Removed a syringe from the medication room and placed the syringe in your pocket;
 - (d) Failed to lock the door to the medication room or the drawer containing narcotics in the medication room;
 - (e) Failed to lock the medication cart;
 - (f) Conducted narcotic counts alone and in the absence of another nurse.
4. On or about April 21, 2016 and without lawful authority, you removed a drug from compliance packaging intended for a resident and provided that drug to G. E., an employee of the Health Centre.

As such, it is alleged that the following provisions have been breached:

The Licensed Practical Nurses Act, 2000

Professional incompetence

23 Professional incompetence is a question of fact, but the display by a member of a lack of knowledge, skill or judgment or a disregard for the welfare of a member of the public served by

the profession of a nature or to an extent that demonstrates that the member is unfit to:

- (a) continue in the practice of the profession; or
- (b) provide one or more services ordinarily provided as a part of the practice of the profession; is professional incompetence within the meaning of this Act.

Professional misconduct

24 Professional misconduct is a question of fact, but any matter, conduct or thing, whether or not disgraceful or dishonourable, is professional misconduct within the meaning of this Act if:

- (a) it is harmful to the best interests of the public or the members;
- (b) it tends to harm the standing of the profession;
- (c) it is a breach of this Act or the bylaws;
- ...

Compliance

49 Every member shall comply with this Act and the bylaws.

SALPN Regulatory Bylaws

19 All members shall ensure that they work within their educational preparation, level of competence, and scope of practice and comply with the standards of practice set out in the *Standards of Practice for Licensed Practical Nurses* approved and adopted by Canadian regulatory agencies as of April 1, 2013.

20 All members shall conduct themselves in an honourable and ethical manner, upholding the values of truth, honesty and trustworthiness, and shall observe the standards of conduct set out in the *Code of Ethics for Licensed Practical Nurses in Canada* approved and adopted by Canadian regulatory agencies as of April 1, 2013.

Code of Ethics and Standards of Practice

Code of Ethics

PRINCIPLE 1: Responsibility to the Public

Licensed Practical Nurses, as self-regulating professionals, commit to provide safe, effective, compassionate and ethical care to members of the public.

Ethical Responsibilities:

LPNs:

- 1.1 Maintain standards of practice, professional competence and conduct.**

PRINCIPLE 3: Responsibility to the Profession

Licensed Practical Nurses have a commitment to their profession and foster the respect and trust of their clients, health care colleagues and the public.

Ethical Responsibilities:

LPNs:

- 3.1 Maintain the standards of the profession and conduct themselves in a manner that upholds the integrity of the profession.**
- 3.3 Practise in a manner that is consistent with the privilege and responsibility of self-regulation.**

PRINCIPLE 5: Responsibility to Self

Licensed Practical Nurses recognize and function within their personal and professional competence and value systems.

Ethical Responsibilities:

LPNs:

- 5.1 Demonstrate honesty, integrity and trustworthiness in all interactions.**
- 5.3 Accept responsibility for knowing and acting consistently with the principles, practice standards, laws and regulations under which they are accountable.**
- 5.5 Inform the appropriate authority in the event of becoming unable to practise safely, competently and/or ethically.**
- 5.8 Maintain the required mental and physical wellness to meet the responsibilities of their role.**

Standards of Practice for Licensed Practical Nurses in Canada

STANDARD 1:

Professional Accountability and Responsibility

Licensed Practical Nurses are accountable for their practice and responsible for ensuring that their practice and conduct meet both the standards of the profession and legislative requirements.

Indicators:

LPNs:

1.9. Practice in a manner consistent with ethical values and obligations of the Code of Ethics for Licensed Practical Nurses.

1.10 Maintain documentation and reporting according to established legislation, regulations, laws and employer policies.

STANDARD 4:

Ethical Practice

Licensed Practical Nurses uphold, promote and adhere to the values and beliefs as described in the Canadian Council for Practical Nurse Regulators (CCPNR) Code of Ethics.

Indicators:

LPNs:

4.1. Practice in a manner consistent with ethical values and obligations of the Code of Ethics for LPNs.

4.10. Practice with honesty and integrity to maintain the values and reputation of the profession.