

INVESTIGATION COMMITTEE  
of the  
COLLEGE OF REGISTERED NURSES OF SASKATCHEWAN

-and-

Robert Wiley  
Saskatchewan RN 0038895



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**DECISION**

of the

**DISCIPLINE COMMITTEE**

of the

COLLEGE OF REGISTERED NURSES OF SASKATCHEWAN

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Legal Counsel for the Investigation Committee:	Lynsey Gaudin
Legal Counsel for Robert Wiley:	No one appearing for Mr. Wiley
Legal Counsel for the Discipline Committee:	Brittnee Holliday
Chairperson for the Discipline Committee:	Anne Kokesch

Date of Hearing: **June 18 & 19, 2025**

Location: *Via Videoconference*  
College of Registered Nurses of Saskatchewan  
1-3710 Eastgate Drive  
Regina, Saskatchewan  
S4Z 1A5

Date of Decision: **September 4, 2025**

## **I. INTRODUCTION**

1. The Discipline Committee of the College of Registered Nurses of Saskatchewan (“CRNS”) convened on June 18 and 19, 2025, via videoconference, to hear and determine a complaint of professional misconduct against Registered Nurse 0038895, Robert Wiley. The Discipline Committee is established pursuant to section 30 of *The Registered Nurses Act, 1988* (the “Act”).

2. The charges against Robert Wiley are outlined in a Notice of Hearing dated March 28, 2025. There are five (5) charges of professional misconduct, and those charges are as follows:

**1. You have committed an act of professional misconduct as per section 26(1) of *The Registered Nurses Act, 1988*, in that, while working for the Saskatchewan Health Authority as a Registered Nurse in [REDACTED], you:**

- (a) Sent text messages of a sexual nature to a client in or around April 2023 while they were under your care, including sending nude photographs of yourself and other individuals to them; and**
- (b) Sent unsolicited text messages of a sexual nature to a co-worker between in or around September to November 2022, including sending nude photographs of yourself; and**
- (c) Telephoned and sent text messages to same client in (a) in or around April 2023, including sending a text message of a threatening nature to the client on or around April 14, 2023, contrary to the Saskatchewan Health Authority’s direction and while you were placed on [REDACTED] for this client; and**
- (d) Discussed the Saskatchewan Health Authority’s confidential investigation into your conduct with a co-worker in or around May 2023 contrary to the Saskatchewan Health Authority’s direction otherwise; and**
- (e) Made sexual and inappropriate remarks during a discussion with your manager on or around June 12, 2023 and did so despite their request for you to end the conversation.**

## II. RELEVANT LEGISLATION

3. The Notice of Hearing alleges that Robert Wiley is guilty of professional misconduct contrary to section 26 (1) of the Act:

**26(1) For the purpose of this Act, professional misconduct is a question of fact but any matter, conduct or thing, whether or not disgraceful or dishonorable, that is contrary to the best interests of the public or nurses or tends to harm the standing of the profession of nursing is professional misconduct within the meaning of this Act.**

4. During the Hearing, the Investigation Committee specified that it was alleged Mr. Wiley also breached portions of section 26(2) of the Act, as follows:

- (a) abused a client verbally or physically;
- ...
- (c) inappropriately used the nurse's professional status for personal gain;
- ...
- (l) failed to comply with the code of ethics of the college;
- ...
- (q) contravened any provision of this Act or the bylaws.

5. The provisions of the CRNS Bylaws, 2023, the Code of Ethics for Registered Nurses (2017), the SRNA Registered Nurse Practice Standards (2019), and the SRNA Registered Nurse Entry-Level Competencies (2019), alleged to have been contravened in the Notice of Hearing are set out in Appendix A of this Decision.

## III. HEARING

6. When the Hearing commenced, shortly after 9:00 a.m. on June 18, 2025, Mr. Wiley was not present. Mr. Wiley advised the Hearing Facilitator at 4:20 p.m. on June 16, 2025 that he would not be available for the Hearing. Legal counsel for the Investigation Committee advised it was the position of the Investigation Committee, pursuant to section 30(9) of the Act, that the Hearing should proceed in Mr. Wiley's absence.

7. Regarding whether to proceed in Mr. Wiley's absence, the Investigation Committee tendered the following documents, which were marked as Exhibits:

- (a) Notice of Hearing, dated March 28, 2025 (Exhibit P1);
- (b) Affidavit of Service regarding the Notice of Hearing, sworn April 9, 2025 (Exhibit P2);
- (c) Affidavit of Service regarding Disclosure on behalf of the Investigation Committee, sworn May 13, 2025 (Exhibit P3); and,
- (d) Affidavit of Shirley Mandziak, legal assistant, regarding communications with MLT Aikens and Mr. Wiley, sworn June 17, 2025 (Exhibit P4).

8. The Discipline Committee adjourned for 30 minutes to allow CRNS staff to make attempts to contact Mr. Wiley. Being satisfied that Mr. Wiley was properly notified of the Notice of Hearing, including the date, time, and place of the hearing in accordance with section 30(1) of the Act, considering the evidence before it, and considering relevant factors of procedural fairness related to adjournments, the Discipline Committee concluded that the Hearing would proceed in Mr. Wiley's absence. Reasons for this conclusion will be more fully outlined below.

9. The Hearing then proceeded with the Charges being read and not guilty pleas being entered on behalf of Mr. Wiley for each Charge.

10. Considering Mr. Wiley's non-attendance, the Investigation Committee sought to proceed by way of Affidavit evidence for each witness, rather than requiring attendance to provide evidence at the Hearing, relying on sections 30(4) and 30(10) of the Act:

**30 (4) The discipline committee may accept any evidence that it considers appropriate and is not bound by rules of law concerning evidence.**

...

**30 (10) The discipline committee may, either in the absence of the nurse who is the subject of the complaint or with the nurse's consent, accept evidence on affidavit.**

11. The Investigation Committee confirmed that all affiants would be available to answer questions of the Discipline Committee, if required. Considering this, the Discipline Committee

determined the Investigation Committee could proceed to enter its evidence by way of Affidavit. The following Affidavits were filed and marked as Exhibits:

- (a) Affidavit of [REDACTED], affirmed June 10, 2025 (Exhibit P5);
- (b) Affidavit of [REDACTED], sworn June 10, 2025 (Exhibit P6);
- (c) Affidavit of [REDACTED], sworn June 10, 2025 (Exhibit P7);
- (d) Affidavit of [REDACTED], affirmed June 9, 2025 (Exhibit P8); and
- (e) Affidavit of Cheryl Hamilton, sworn June 10, 2025 (Exhibit P9).

12. The Discipline Committee agreed that any published decision would anonymize the affiants in Exhibits P6 and P7, to protect their privacy.

13. Due to the graphic nature of some of the attachments within the Exhibits and in order to protect Mr. Wiley's dignity, the Investigation Committee further applied for a Sealing Order regarding appended exhibit C to the Affidavit of [REDACTED] (Exhibit P6) and appended exhibit G to the Affidavit of [REDACTED] (Exhibit P7).

14. The Discipline Committee considered the Investigation Committee's application for a Sealing Order, open court principles, and the high threshold for Sealing Orders as outlined in the Supreme Court of Canada decision of *Sherman Estate v Donovan*, 2021 SCC 25. The Discipline Committee notes that Mr. Wiley was not present and the Investigation Committee made this Application to protect Mr. Wiley's dignity and privacy. Courts have declined to grant Sealing Orders in circumstances where less restrictive measures would satisfy any privacy concerns. The Discipline Committee determined that blurring of the graphic portions of the photographs appended as exhibit C in Exhibit P6 and the photograph appended as exhibit G in Exhibit P7, would satisfy the concerns raised and asked that the Investigation Committee provide such blurred photographs for filing on the public record.

15. Following the Hearing, legal counsel for the Investigation Committee made attempts to blur the graphic portions of the above images; however, such blurring did not satisfy the Discipline Committee that Mr. Wiley's dignity and privacy would be protected. As such, the

Discipline Committee will instead require portions of the above noted Exhibits to instead be redacted by placing a black box on the graphic portions.

16. Legal counsel for the Investigation Committee also filed a Brief of Law, dated June 19, 2025. The Discipline Committee thanks legal counsel for this Brief.

**A. Decision to Proceed in the Absence of Mr. Wiley:**

17. As indicated, the Investigation Committee filed Affidavits noting proof of service of the Notice of Hearing and Disclosure, as well as an Affidavit setting forth all communications with Mr. Wiley regarding the Hearing (Exhibits P2, P3, and P4). Based on these exhibits, the Discipline Committee has found the following material facts:

- (a) Mr. Wiley was served with the Notice of Hearing on April 1, 2025, by way of personal service;
- (b) The Notice of Hearing, dated March 28, 2025, properly identified the date, time, and location of the Hearing, as well as the Charges against Mr. Wiley;
- (c) Counsel for the Investigation Committee made numerous attempts to contact and coordinate with Mr. Wiley in advance of serving the Notice of Hearing and following service, including on December 20, 2024, January 8, 2025, March 31, 2025, and April 15, 2025.
- (d) On April 24, 2025, the CRNS Hearing Facilitator emailed Mr. Wiley, including legal counsel for the Investigation Committee, confirming Hearing details and the names of the Discipline Panel, and to advise that a Case Management Conference would be scheduled;
- (e) On April 25, 2025, Mr. Wiley responded to legal counsel for the Investigation Committee's email of April 15, 2025 inquiring about disclosure and witnesses;
- (f) On April 28, 2025, Mr. Wiley was personally served with the Investigation Committee's disclosure;
- (g) On April 30, 2025, Mr. Wiley responded to his April 25, 2025 email noting confidentiality concerns with service of the disclosure;

- (h) On April 30, 2025, legal counsel for the Investigation Committee provided a response to issues raised in Mr. Wiley's April 25 and April 30, 2025 emails, offering alternative options for service and suggesting a Case Management Conference would be appropriate;
- (i) On May 1, 2025, Mr. Wiley responded to legal counsel for the Investigation Committee again asking questions about confidentiality of the disclosure served on him;
- (j) On May 5, 2025, legal counsel for the Investigation Committee responded to Mr. Wiley's May 1, 2025 email;
- (k) On May 7, 2025, a Hearing Facilitator for CRNS sent an email to Mr. Wiley and legal counsel for the Investigation Committee outlining the outstanding requests from the April 24, 2025 email and requesting availability for a Case Management Conference;
- (l) On May 8, 2025, legal counsel for the Investigation Committee forwarded the Hearing Facilitator's May 7, 2025 email directly to Mr. Wiley to ensure he had received the same and encouraging Mr. Wiley to respond to the Hearing Facilitator to coordinate a Case Management Conference;
- (m) On May 8, 2025, Mr. Wiley responded to legal counsel for the Investigation Committee again raising questions about the confidentiality of the disclosure served on him, suggesting he would be calling legal counsel and members of the CRNS as witnesses, and suggesting he did not receive an email from the Hearing Facilitator and would only accept communications by email;
- (n) On May 9, 2025, legal counsel for the Investigation Committee emailed the Hearing Facilitator and Mr. Wiley confirming availability for the Case Management Conference and advising that Mr. Wiley advised he did not receive the May 7, 2025 email from the Hearing Facilitator. In the body of the email, legal counsel for the Investigation Committee included the Hearing Facilitator's May 7, 2025 email;
- (o) Mr. Wiley responded to legal counsel for the Investigation Committee's May 9, 2025 email on May 25, 2025 but did not respond to the Hearing Facilitator's May 7, 2025 email.

- (p) On May 13, 2025, legal counsel for the Investigation Committee responded to Mr. Wiley's May 8 and 12, 2025 emails;
- (q) On May 14, 2025, the Hearing Facilitator emailed Mr. Wiley, including legal counsel for the Investigation Committee, to advise that the Case Management Conference was scheduled for May 22, 2025, advising of the name of the Chair for the Conference to ensure there was no conflict of interest, and providing details on how Mr. Wiley could access the Conference;
- (r) On May 15, 2025, Mr. Wiley responded to the May 13, 2025 email advising he would not participate in legal counsel's "kangaroo court" and was out of the country on contract work for three weeks, among other things;
- (s) On May 16, 2025, legal counsel for the Investigation Committee emailed Mr. Wiley and the Hearing Facilitator, including the Hearing Facilitator's May 14, 2025 email;
- (t) On May 20, 2025, legal counsel for the Investigation Committee emailed the Hearing Facilitator and Mr. Wiley to advise that Mr. Wiley had advised that he was out of the country but had not indicated whether that would impact his ability to attend the Case Management Conference. Legal counsel for the Investigation Committee also confirmed to Mr. Wiley that he could attend the Case Management Conference from any location and that it was set without his input as he had not responded despite multiple opportunities;
- (u) On May 20, 2025, legal counsel for the Investigation Committee also responded to Mr. Wiley's May 15, 2025 email;
- (v) On May 22, 2025, the Case Management Conference proceeded in the absence of Mr. Wiley. Following the Case Management Conference, the Hearing Facilitator sent an email to Mr. Wiley and legal counsel for the Investigation Committee regarding the outcome of the meeting and providing the Case Management Conference form completed by the Chair of the Case Management Conference. At the direction of the Chair of the Case Management Conference, Mr. Wiley was also provided with an opportunity to request an additional Case Management Conference and confirm any conflicts of interest with the Discipline Committee;
- (w) Mr. Wiley did not respond to the May 22, 2025 email correspondence or seek an additional Case Management Conference;



- (x) On June 13, 2025, legal counsel for the Investigation Committee provided Mr. Wiley, by email, with the exhibit binders and the CRNS Discipline Process and Hearing Information package;
- (y) On June 16, 2025 at 4:20 p.m., Mr. Wiley responded to legal counsel for the Investigation Committee suggesting he was out of the country on contract work and would not be able to contact her by any means until August or September and that it would be the last correspondence received until his contract was completed;
- (z) On June 17, 2025 at 8:54 a.m., legal counsel for the Investigation Committee responded to Mr. Wiley advising that no request for an adjournment of the Discipline Hearing commencing June 18, 2025 had been received and outlining the Investigation Committee's position that it would request the Hearing to proceed in Mr. Wiley's absence.

18. In requesting to proceed in the absence of Mr. Wiley, legal counsel for the Investigation Committee noted that an adjournment had not been requested at any time, including in Mr. Wiley's June 16, 2025 email noting his unavailability for the Hearing scheduled June 18-20, 2025. Further, the Investigation Committee noted that the statutory prerequisites to proceed were met, being that the Notice of Hearing was properly served and Mr. Wiley had failed to attend to the Hearing at the date and time indicated, noting the date, time, and location of the hearing was clearly set out and Mr. Wiley had been personally served by having the Notice of Hearing handed directly to him by the process server.

19. The Investigation Committee further noted that Mr. Wiley had provided no explanation of where he was, what contract work he was attending to, and why he might be unavailable for any form of communication for two to three months, including no explanation for why he was unable to access the virtual hearing or internet for communication, despite sending the June 16, 2025 email from his iPhone. In addition, the Investigation Committee reviewed instances where Mr. Wiley had been made aware that the Hearing may proceed in his absence, his failure to communicate with the Hearing Facilitator regarding the Case Management Conference and the additional opportunity to schedule another Case Management Conference, should he wish.

20. The Discipline Committee determined that the statutory conditions had been met to proceed in the absence of Mr. Wiley; however, it also reviewed relevant case law and factors to consider when considering adjournments in the context of procedural fairness.

21. The leading case regarding how to determine the scope and application of the duty of procedural fairness is the Supreme Court of Canada decision in *Baker v Canada (Minister of Citizenship and Immigration)*, [1999] 2 S.C.R. 817:

**21 The existence of a duty of fairness, however, does not determine what requirements will be applicable in a given set of circumstances. As I wrote in *Knight v. Indian Head School Division No. 19*, 1990 CanLII 138 (SCC), [1990] 1 S.C.R. 653, at p. 682, “the concept of procedural fairness is eminently variable and its content is to be decided in the specific context of each case”. All of the circumstances must be considered in order to determine the content of the duty of procedural fairness: *Knight*, at pp. 682-83; *Cardinal*, *supra*, at p. 654; *Old St. Boniface Residents Assn. Inc. v. Winnipeg (City)*, 1990 CanLII 31 (SCC), [1990] 3 S.C.R. 1170, *per Sopinka J.***

**22 Although the duty of fairness is flexible and variable, and depends on an appreciation of the context of the particular statute and the rights affected, it is helpful to review the criteria that should be used in determining what procedural rights the duty of fairness requires in a given set of circumstances. I emphasize that underlying all these factors is the notion that the purpose of the participatory rights contained within the duty of procedural fairness is to ensure that administrative decisions are made using a fair and open procedure, appropriate to the decision being made and its statutory, institutional, and social context, with an opportunity for those affected by the decision to put forward their views and evidence fully and have them considered by the decision-maker.**

22. The Court in *Baker* went on to identify a non-exhaustive list of factors affecting the duty of fairness:

- (a) Nature of the decision being made and the process followed in making it (para. 23)
- (b) The nature of the statutory scheme and the terms of the statute pursuant to which the body operates (para. 24)
- (c) The importance of the decision to the individual affected (para. 25)
- (d) The legitimate expectations of the person challenging the decision (para. 26)

**(e) The choices of procedure made by the agency itself, particularly when the statute leaves to the decision-maker the ability to choose its own procedures (para. 27)**

23. Additionally, the Discipline Committee reviewed several factors and considerations that may be applicable in considering an adjournment, such as:

(a) Factors which may support the denial of an adjournment:

- Lack of compliance with prior orders
- Previous adjournments granted
- Previous peremptory hearing dates
- Desirability of having the matter decided
- A finding that the applicant is seeking to manipulate the system by orchestrating delay

(b) Factors which may favor the granting of an adjournment:

- Consequences of the hearing are serious
- Applicant would be prejudiced if the request were not granted
- A finding that the applicant was honestly seeking to exercise his right to counsel and had been represented up until the time of the adjournment request

(c) Additional considerations:

- Timeliness of the request
- Reasons for being unable to proceed on the scheduled date
- Length of requested adjournment
- Public interest in dealing with matters expeditiously
- Tribunal's interest in dealing with matters expeditiously
- Implications of not granting the request
- Whether the public interest could be protected by other means (such as an agreement not to practice)
- Adjournments, particularly at last minute, often lead to cost and inconvenience and impede the effective administration of justice
- Efforts made to avoid the adjournment
- The granting of adjournments or postponements is discretionary in nature and there is no presumption of entitlement

24. The Discipline Committee recognizes that this Hearing has potentially serious consequences for Mr. Wiley but determined that Mr. Wiley was well aware of the date, time, and location of the Hearing and was provided ample time and notice of each step leading up to the Hearing, including an ability to communicate any availability issues or requests for an adjournment of the Hearing. Mr. Wiley was not present at the original Case Management Conference and did not make a request for an additional Case Management Conference when

offered to sort out any issues he had with disclosure or the hearing date. Mr. Wiley did not make a formal request for an adjournment, despite legal counsel for the Investigation Committee's communication informing him of how he could do this and CRNS staff made multiple attempts to contact Mr. Wiley during the morning of June 18, 2025.

25. The Discipline Committee is of the opinion that Mr. Wiley was afforded procedural fairness and was provided a fair and open procedure, with an opportunity to put forward his views and evidence fully to be considered by this Discipline Committee. The Discipline Committee recognizes its discretion to postpone the Hearing but did not exercise that discretion. Mr. Wiley did not provide any evidence or background as to his inability to communicate or attend the Hearing, the Discipline Committee had no indication or guarantee of future participation and the length of any required adjournment, particularly considering Mr. Wiley's history of non-communication with the Hearing Facilitator and statement that he would not communicate further until some point two to three months down the road. The Discipline Committee finds that further delay would not serve the public or the CRNS' mandate to deal with matters expeditiously, and Mr. Wiley's perceived attempt to delay at last minute causes cost, inconvenience, and impedes the effective administration of justice.

#### **IV. SUMMARY OF WITNESS EVIDENCE**

##### Cheryl Hamilton

26. Ms. Hamilton, Director of Registration Services and Professional Conduct for the College of Registered Nurses of Saskatchewan (CRNS), verified that Mr. Wiley was registered as a practicing Registered Nurse until November 30, 2024, following which he became inactive.

27. [REDACTED] was the Saskatchewan Health Authority (SHA) [REDACTED] of Mr. Wiley from July 2022 until February 2024 while he was employed in [REDACTED].

28. In February 2023, [REDACTED] was notified that [REDACTED], a [REDACTED] client of Mr. Wiley and [REDACTED], preferred to receive care from another nurse who [REDACTED] felt provided better care. At that point, [REDACTED] placed Mr. Wiley on [REDACTED]

██████████, ██████████ to provide care to this client. Sometime after being marked as ██████████ Mr. Wiley raised issues with colleagues about why he was no longer attending to this client for ██████████. ██████████ then met with Mr. Wiley, advised him he had been placed ██████████ and was directed not to contact the client further.

29. On April 18, 2023, it was reported to ██████████ that Mr. Wiley had sent texts of a threatening nature to the client after he had been advised not to contact the client, which were included as part of the evidence package. Additionally, ██████████ was made aware that Mr. Wiley had also sent naked photos of himself and two other women to the client by text. ██████████ contacted the client and asked them to provide copies of the texts/photographs that were sexual in nature. The client provided only a copy of the naked photographs of Mr. Wiley; however, these photographs and text messages were not included in the evidence package.

30. Upon SHA investigating the communications, it came to light that Mr. Wiley had also been sending unsolicited similar graphic material to a coworker, ██████████.

31. As a part of the SHA investigation, Mr. Wiley met with ██████████ and the Primary Health Care Manager, a Labour Relations Consultant, and Mr. Wiley's union representatives on May 1, 2023. During this meeting, Mr. Wiley admitted to sending the texts described as threatening to the client on April 14, 2023, stating he was trying to alleviate fears of another scheduler who he thought was afraid of him. Mr. Wiley also admitted to sending nude photographs of himself and two women to the client approximately six to eight months prior. In addition, Mr. Wiley admitted he sent text messages of a sexual nature and nude photographs to his co-worker, that he knew the text messages and nude photographs were unwelcome, and that sending the messages and photographs to his coworker should not have happened. At the conclusion of the meeting, Mr. Wiley was advised that the investigation was confidential and should not be discussed with anyone.

32. On May 4, 2023, ██████████ was advised by the coworker that Mr. Wiley had approached her at the bank and spoken about the investigation.

33. The SHA investigation concluded at the end of May 2023 and Mr. Wiley was found to be insubordinate for reaching out to the client after being directed not to. It was also found that

Mr. Wiley had sent sexually inappropriate photographs to a client and a co-worker, knowing it was unwelcome, and that Mr. Wiley had sent text messages of a threatening nature to the client.

34. As a result of the findings, the SHA issued Mr. Wiley a five-day unpaid suspension at a meeting on June 1, 2023 and he was advised the incidents would be reported to the CRNS.

35. Mr. Wiley returned to work after the 5-day suspension on June 12, 2023. On his first morning back, he discussed matters of a personal and sexual nature with [REDACTED]. [REDACTED] noted Mr. Wiley was laughing at times in the conversation, that the conversation made her uncomfortable, and that Mr. Wiley was asked several times to stop the conversation. [REDACTED] reported these interactions to her supervisor and participated in the internal SHA investigation into this interaction. [REDACTED] was later advised that Mr. Wiley was placed on a further 30-day disciplinary suspension for this conduct.

[REDACTED]

36. [REDACTED] was a co-worker of Mr. Wiley [REDACTED] since 2015. They had a good personal relationship, but it was not sexual nor romantic. Over several months in 2022, Mr. Wiley sent numerous unsolicited nude photos of himself and sexually explicit texts to this coworker, such texts forming evidence put forth at the Hearing. Mr. Wiley was advised these types of text messages were not welcome. [REDACTED] responses to these texts were brief and attempts were made to change the subject or in some instances asking him to stop. At one point, Mr. Wiley apologized and said he had been under the influence of drugs and alcohol when sending them.

37. [REDACTED] advised Mr. Wiley on more than one occasion that they needed to maintain a professional relationship. Throughout receiving these messages, [REDACTED] did not tell Mr. Wiley she was interested in a sexual or romantic relationship, nor did she encourage or pursue one. She advised Mr. Wiley, at times, that she did not want to receive sexually explicit text messages or photographs. [REDACTED] did not block messages from Mr. Wiley and was concerned about responding negatively as she was concerned how he would react as a coworker, being that they would have to [REDACTED] together.

38. In April of 2023, [REDACTED] was approached by her manager [REDACTED] about the text messages received from Mr. Wiley. At [REDACTED] request, [REDACTED] shared the messages with [REDACTED].

39. In May of 2023, [REDACTED] ran into Mr. Wiley at the bank. [REDACTED] states that he waited outside for her and asked if it was okay to talk. [REDACTED] asked him where he had been and he replied he had been suspended for sending graphic material to her. She stated she was not the only person he had been approaching, and he said he could not talk about it and left. [REDACTED] subsequently spoke to her manager as she thought the investigation was confidential and was worried Mr. Wiley would retaliate against her. [REDACTED] confirmed the investigation was confidential, that all parties involved should not be discussing it, and that Mr. Wiley was aware of this.

[REDACTED]

40. [REDACTED] ("the client") was a [REDACTED] client of Mr. Wiley. She was a client of his from 2020-2023 and [REDACTED] for two to three years prior. The client considered Mr. Wiley a friend at the time, but they did not have a sexual or romantic relationship.

41. By February of 2023, the client felt she preferred the care she received from another nurse for various reasons and expressed this to Mr. Wiley's manager, [REDACTED]. The client advised [REDACTED] she did not want to cause any trouble for Mr. Wiley and did not ask for him to be [REDACTED] on her chart.

42. On April 14, 2023, the client received a text message from Mr. Wiley referring to the fact that he wanted "management" to know he did not have "fore arms [sic] or anything that had the means for mass killing". He followed up saying he had no ill will against her but would be suing various people. Several more angry texts followed with profane language directed toward her. At this point, the client was concerned that Mr. Wiley may [REDACTED] harm her. The following day, the client received two more text messages from Mr. Wiley. Mr. Wiley stated that he was sorry.

43. On April 17, 2023, the client was expecting her [REDACTED] nurse and advised her in advance that she had received angry text messages from Mr. Wiley. The [REDACTED] nurse viewed the messages and encouraged the client to report the messages to [REDACTED]. While the client did not do so, she was contacted by [REDACTED] about the messages later that day. At [REDACTED] request, the client provided [REDACTED] with a copy of the text messages.

44. The client had also shared with the [REDACTED] nurse that in August 2022 Mr. Wiley had sent her three naked photos of himself and other photos of himself naked with other women. The client had not kept a record of the photographs of Mr. Wiley with the other naked women but did provide a copy of the photographs of Mr. Wiley to the CRNS Investigator.

45. The client confirmed that she did not tell Mr. Wiley she was interested in a sexual or romantic relationship, she did not pursue a sexual or romantic relationship, she did not encourage or ask Mr. Wiley to send her explicit messages or photographs, and she did not want to receive explicit text messages or photographs from Mr. Wiley.

[REDACTED]

46. [REDACTED] was appointed by the Investigation Committee of the CRNS to investigate two complaints received from the SHA against Mr. Wiley. The First Complaint was received June 1<sup>st</sup>, 2023, from [REDACTED], related to Charges (a), (b), (c), and (d). The Second Complaint was received July 12, 2023, from [REDACTED], [REDACTED], [REDACTED], [REDACTED], related to Charge (e).

47. On July 7, 2023, Mr. Wiley provided a written response to the First Complaint through his legal counsel. The response can be summarized as follows:

- (a) Regarding the April 14, 2023 text messages to the client (Charge (c) for reference), Mr. Wiley advised that he had been a friend of the client for seven years. The day prior she shared with him that a fellow coworker was afraid of him. During the evening he sent the messages, he had consumed drugs and edibles and stated his intention was to allay the fears of the coworker that they need not be afraid of him. He stated that he did not intend it to be a threat. Following this episode, he had made



an appointment with a psychiatrist. Mr. Wiley specifically acknowledged he was advised not to contact the client, but he did contact her.

- (b) Regarding the nude photographs sent to the client (Charge (a) for reference), Mr. Wiley acknowledged he did send a naked photograph to her. Mr. Wiley maintained the client was trying to set him up with a woman and the client had sent him photos of this woman's nude breasts. In response, he said he sent this nude photograph back.
- (c) Regarding the text messages of a sexual nature and nude photographs sent to his co-worker (Charge (b) for reference), Mr. Wiley acknowledged that he sent nude photographs of himself to the co-worker on two occasions in the Fall of 2023, noting he had consumed alcohol and edibles on these occasions. Mr. Wiley said he felt the co-worker was romantically interested in him. He acknowledged this was incorrect.
- (d) Regarding discussion of the investigation with the co-worker (Charge (d) for reference), Mr. Wiley explained that he greeted the co-worker outside the bank just prior to getting into his vehicle and she greeted him back. Mr. Wiley stated he advised the co-worker he was in trouble for sending the nude photographs to her and he says the co-worker responded something along the lines of "yes and to other women". Mr. Wiley stated that he recalled saying "we better not talk about it" and the interaction ended.

48. On August 16, 2023, Mr. Wiley provided a written response to the Second Complaint (regarding Charge (e) for reference) through his legal counsel. The response can be summarized as follows:

- (a) Mr. Wiley stated he returned to work June 12<sup>th</sup>, 2023 and had approached his manager to request a day off the following week for very personal, marital reasons. He had shared what those were and then advised that he wanted to discuss some additional matters with her, including that his mood may be affected by new medications he had been prescribed.

- (b) Mr. Wiley advised that he felt he needed to inform his employer of his health situation and how it may impact him. He did not recall speaking in a laughing tone but does recall alluding to the fact that he could not ejaculate without stating it with words. He did not recall waving his hands to express this.
- (c) Mr. Wiley did not recall his manager telling him not to discuss the matter or observe that she was uncomfortable. After sharing the information, he does recall his manager telling him to “stop talking” and he replied “okay”.
- (d) At the time of sharing the information he thought it was relevant to advising his employer about his health status but then acknowledges the personal information shared was not appropriate and, specifically, that personal information pertaining to sex was inappropriate.

49. Also tendered in [REDACTED] Affidavit was the September 19, 2023 recording of an interview [REDACTED] conducted with Mr. Wiley as part of the Investigation. Mr. Wiley was accompanied by his lawyer in this interview. A summary of his statements during this interview is as follows:

- (a) Mr. Wiley acknowledged that he sent graphic images and texts to both his former [REDACTED] client [REDACTED]. He also acknowledged he sent the client text messages on April 14, 2023. He stated the text messages and nude photographs sent to both were sent while under the influence of drugs and edibles. Mr. Wiley acknowledged these messages and photographs were not welcome.
- (b) Mr. Wiley also acknowledged that he was aware he was not to contact the client after being [REDACTED] but continued to do so as he considered her a friend.
- (c) Mr. Wiley also advised that he is ex-military but no longer possesses weapons and that he suffers from PTSD, insomnia, depression, anxiety, and alcoholism. Mr. Wiley stated he was under the care of a psychiatrist, had been in detox, and, at the time of the interview, had been sober for seven weeks.
- (d) Mr. Wiley stated, in hindsight, it was inappropriate for a registered nurse to have sent the text messages and photographs to a client and co-worker.

- (e) Mr. Wiley also acknowledged speaking to the co-worker about the confidential investigation after being directed by management not to talk about the investigation. Mr. Wiley explained that they had waved at each other and the co-worker had asked how he was doing. In response he said not great as he was in trouble for sending the nude photographs to her. She responded that he had also sent other people nude photographs and at that point he stated they should not be speaking about it.
- (f) Mr. Wiley also acknowledged having made inappropriate and sexual remarks in a meeting with his manager, [REDACTED], and acknowledged that his remarks made her uncomfortable.
- (g) Mr. Wiley ended the interview by stating his comments were inappropriate and he will never talk to “them” about anything personal again.

## V. ANALYSIS

### Charge (a)

50. The client was a [REDACTED] client of Mr. Wiley’s during the time she received nude photographs. Mr. Wiley also confirmed, through written response and during his interview with [REDACTED], he had been providing care to the client when he sent a nude photograph.

51. The Discipline Committee finds that this behaviour amounts to professional misconduct as Mr. Wiley had a responsibility to maintain professional boundaries with the client and such conduct is contrary to the best interests of the public and tends to harm the standing of the profession. This behaviour also amounts to professional misconduct pursuant to section 26(2)(q) of the Act as Mr. Wiley’s conduct breached many provisions of the Canadian Nurses Association *Code of Ethics for Registered Nurses, 2017* (the “Code of Ethics”), *SRNA Registered Nurse Entry-Level Competencies (2019)* (“Entry-Level Competencies”), and the *SRNA Registered Nurse Practice Standards (2019)* (“Practice Standards”).

52. The Code of Ethics requires Mr. Wiley to “provide safe, compassionate, competent and ethical care”,<sup>1</sup> to “build trustworthy relationships with persons receiving care”,<sup>2</sup> and to treat to all persons receiving care with respect<sup>3</sup>. Additionally, the Code of Ethics states:

**Nurses maintain appropriate professional boundaries and ensure their relationships are always for the benefit of the person. They recognize the potential vulnerability of persons receiving care and do not exploit their trust and dependency in a way that might compromise the therapeutic relationship. They do not abuse their relationship for personal or financial gain and do not enter into personal relationships (romantic, sexual or other) with persons receiving care.<sup>4</sup>**

53. The Entry Level Competencies require Mr. Wiley to establish and maintain professional boundaries with clients<sup>5</sup> and to create and maintain professional relationships<sup>6</sup>. The Practice Standards likewise impose obligations to establish therapeutic, caring and culturally safe relationships with clients,<sup>7</sup> to uphold and maintain professional boundaries with clients,<sup>8</sup> to recognize and address potential conflicts in relationships with clients,<sup>9</sup> and to communicate respectfully and effectively in collaboration with clients.<sup>10</sup> Mr. Wiley failed to maintain professional boundaries.

54. The Discipline Committee concludes that Charge (a) is substantiated.

#### Charge (b)

55. The evidence supports that Mr. Wiley sent the co-worker numerous text messages of a sexual nature as well as photographs of his genitalia. These messages and photographs were not solicited or wanted. Mr. Wiley confirmed, through written response and during his interview with [REDACTED], that he sent the messages and photographs as he felt the co-worker was romantically interested in him and admits that he was incorrect in this assumption.

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<sup>1</sup> Code of Ethics, A. See also A.2.

<sup>2</sup> Code of Ethics, A.3

<sup>3</sup> Code of Ethics, D.1

<sup>4</sup> Code of Ethics, D.7

<sup>5</sup> Entry Level Competencies, Competency 2, 2.6

<sup>6</sup> Entry Level Competencies, Competency 3, 3.3

<sup>7</sup> Practice Standards, Standard 3

<sup>8</sup> Practice Standards, Standard 3.30

<sup>9</sup> Practice Standards, Standard 3.27

<sup>10</sup> Practice Standards, Standard 3.29

56. The Discipline Committee finds that this behaviour amounts to professional misconduct as Mr. Wiley sent numerous text messages and nude photographs at a time when he did not have a romantic or sexual relationship with the co-worker and the co-worker had made her disinterest in receiving such messages and photographs clear. This conduct is contrary to the best interests of the public and tends to harm the standing of the profession. Mr. Wiley had a duty to maintain appropriate professional boundaries with his co-worker and did not do so.

57. Mr. Wiley's conduct is also professional misconduct under s. 26(2) because it breaches the *Bylaws*. Mr. Wiley's conduct breaches the Code of Ethics, which requires registered nurses to conduct themselves according to the outlined ethical responsibilities in how they interact with other members of the healthcare team,<sup>11</sup> to "foster a safe, quality practice environment",<sup>12</sup> and to contribute to positive and health practice environments.<sup>13</sup> The Code of Ethics also requires that nurses treat each other and colleagues in a respectful manner and to honor dignity.<sup>14</sup>

58. The Discipline Committee finds that Charge (b) is substantiated.

#### Charge (c)

59. The evidence supports that Mr. Wiley sent the April 14, 2023 messages to the client and that he had done so when he had been explicitly told not to contact the client. Mr. Wiley acknowledged sending the message and, while Mr. Wiley suggests he did not intend the messages to be threatening, he did acknowledge that the messages had been sent when he had been told not to contact the client.

60. The Discipline Committee finds that the text messages sent on April 14, 2023 were threatening and inappropriate. The Discipline Committee finds that Mr. Wiley's conduct fell well below what the public expects of a registered nurse, thus being contrary to the best interests

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<sup>11</sup> Code of Ethics, A.1

<sup>12</sup> Code of Ethics, A.12

<sup>13</sup> Code of Ethics, F.8

<sup>14</sup> Code of Ethics, D.12

of the public and harming the standing of the profession. Mr. Wiley's conduct also breached the *Bylaws* and constitutes professional misconduct pursuant to section 26(2)(q) of the Act.

61. The Code of Ethics required Mr. Wiley to: build a trustworthy relationship with the client as a foundation of meaningful communication,<sup>15</sup> ensure his relationship with the client was always for her benefit, and not abuse the client for personal or financial gain.<sup>16</sup> The Entry Level Competencies required Mr. Wiley to: be committed to the client's health and well-being,<sup>17</sup> demonstrate a professional presence in his verbal and nonverbal communications to lead to trusting relationships,<sup>18</sup> use evidence-informed communication skills to build a trusting, compassionate and therapeutic relationship with her,<sup>19</sup> and use conflict transformation strategies within this relationship.<sup>20</sup> As noted above regarding Charge (a), Mr. Wiley also had obligations to maintain professional boundaries with the client and to exercise professional judgment. Mr. Wiley's communications with the client, despite specific direction not to contact her, disregarded the fundamental obligations he owed to the client.

62. The Discipline Committee finds that Charge (c) is substantiated.

#### Charge (d)

63. The evidence before the Discipline Committee establishes that brief communication about the confidential investigation did occur; however, Mr. Wiley discontinued such discussions promptly, noting that he and the co-worker should not be discussing the matter.

64. Mr. Wiley did refer to the confidential investigation when asked how he was doing. While this comes close to the line, the Discipline Committee finds that the facts and evidence in this charge does not rise to the level of professional misconduct and therefore is not substantiated.

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<sup>15</sup> Code of Ethics, A.3

<sup>16</sup> Code of Ethics, D.7

<sup>17</sup> Entry Level Competencies, Competency 2

<sup>18</sup> Entry Level Competencies, Competency 2.2

<sup>19</sup> Entry Level Competencies, Competency 3.3

<sup>20</sup> Entry Level Competencies, Competency 3.4

Charge (e)

65. The evidence establishes that Mr. Wiley made sexual and inappropriate personal remarks during a meeting with his manager, and the Discipline Committee finds this continued despite [REDACTED] request that he stop. Mr. Wiley acknowledged this occurred in his written response to the Second Complaint and in his interview with [REDACTED]. He also recognized in hindsight that sharing the personal information was not appropriate and, specifically, that sharing personal information pertaining to sex was inappropriate.

66. The Discipline Committee finds that this conduct amounts to professional misconduct. [REDACTED] was Mr. Wiley's manager and despite having just been suspended for sending inappropriate and sexual text messages and photographs to a client and co-worker, Mr. Wiley discussed inappropriate personal information, including making sexual remarks. This occurred on the day Mr. Wiley returned from his suspension. For all of the reasons set out above regarding why the sexually explicit text messages to the co-worker in Charge (b) amount to professional misconduct, the Discipline Committee finds the same to be true of the discussion with [REDACTED]. While the inappropriate communications with the co-worker were over a significant period of time, Mr. Wiley's conduct was similarly inappropriate.

67. The Discipline Committee finds that Charge (e) is substantiated.


**VI. CONCLUSION**

68. In the end result, the Discipline Committee finds Mr. Wiley guilty of Charges (a), (b), (c), and (e). Mr. Wiley had a responsibility to maintain professional boundaries with patients and co-workers, regardless of friendship. He did not. Mr. Wiley's conduct is contrary to the best interests of the public and tends to harm the standing of the profession. Moreover, Mr. Wiley's conduct amounts to abuse of a patient as he was using his professional status for personal gain (an inappropriate relationship with a patient). The Code of Ethics, Entry Level Competencies, and Practice Standards required Mr. Wiley to provide safe, compassionate, competent and ethical care, to conduct himself professionally with other members of the healthcare team and clients, and to treat to all persons receiving care with respect. He did not.

69. Regarding Charge (d), the Discipline Committee has concluded that the facts and circumstances, while close to the line, did not rise to the level required to establish professional misconduct.

70. In light of the Discipline Committee's findings, the Discipline Committee will reconvene to hear submissions regarding sanction pursuant to section 31 of the *Act*. The Penalty Hearing will be scheduled in consultation with Mr. Wiley, legal counsel, and the Discipline Committee as to availability.

September 4, 2025



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Anne KoKesch, RN, Chairperson  
*On behalf of Members of the Discipline Committee*  
Chris Barlow, RN (Retired)  
Kristin Dutchak, RN  
Len Wegner, RN  
Leah Currie, Public Representative



Pursuant to section 31(1)(e) of the Act, a copy of this decision will also be forwarded to:

- (a) The editor of the CRNS news bulletin and the administrator for the CRNS website;
- (b) All Canadian Registrars of registered nurses;
- (c) College of Licensed Practical Nurses of Saskatchewan;
- (d) College of Registered Psychiatric Nurses of Saskatchewan;
- (e) The College of Physicians and Surgeons of Saskatchewan; and,
- (f) Any other jurisdictions or other stakeholders as may be seen as appropriate by the Registrar.

#### Right of Appeal

Pursuant to section 34(1) of *The Registered Nurses Act, 1988*, a nurse who has been found guilty by the discipline committee or who has been expelled pursuant to section 33 may appeal the decision or any order of the discipline committee within 30 days of the decision or order to:

- (a) the council by serving the executive director with a copy of the notice of appeal; or
- (b) a judge of the court by serving the executive director with a copy of the notice of appeal and filing it with a local registrar of the court.

## Appendix A

### LEGISLATION, BYLAWS, CODE OF ETHICS, PRACTICE STANDARDS & COMPETENCIES CONTRAVENED:

#### *The Registered Nurses Act, 1988*

26(1) For the purpose of this *Act*, professional misconduct is a question of fact but any matter, conduct or thing, whether or not disgraceful or dishonourable, that is contrary to the best interests of the public or nurses or tends to harm the standing of the profession of nursing is professional misconduct within the meaning of this *Act*.

26(2)

- (a) abused a client verbally or physically;
- ...
- (c) inappropriately used the nurse's professional status for personal gain;
- ...
- (l) failed to comply with the code of ethics of the college;
- ...
- (q) contravened any provision of this Act or the bylaws.

#### *CRNS Bylaws, 2023*

Bylaw XIV Section 1: Code of Ethics of the Association

Bylaw XV Section 1: Standards and Competencies

#### *Code of Ethics for Registered Nurses (2017)*

#### **A. Providing Safe, Compassionate, Competent and Ethical Care**

Nurses provide safe, compassionate, competent and ethical care.

##### ***Ethical responsibilities:***

1. Nurses have a responsibility to conduct themselves according to the ethical responsibilities outlined in this document and in practice standards in what they do and how they interact with persons receiving care and other members of the health-care team.
2. Nurses engage in compassionate care through their speech and body language and through their efforts to understand and care about others' health-care needs.
3. Nurses build trustworthy relationships with persons receiving care as the foundation of meaningful communication, recognizing that building these relationships involves a conscious effort. Such relationships are critical to understanding people's needs and concerns.
12. Nurses foster a safe, quality practice environment (CNA & Canadian Federation of Nurses Unions [CFNU], 2015).

13. Nurses work toward preventing and minimizing all forms of violence by anticipating and assessing the risk of violent situations and by collaborating with others to establish preventive measures. When violence cannot be anticipated or prevented, nurses take action to minimize risk and to protect others and themselves (CNA, 2016a; CNA & CFNU, 2015; Canadian Nursing Students' Association, 2014).

#### **D. Honouring Dignity**

Nurses recognize and respect the intrinsic worth of each person.

##### ***Ethical responsibilities:***

1. Nurses, in their professional capacity, relate to all persons receiving care with respect.
7. Nurses maintain appropriate professional boundaries and ensure their relationships are always for the benefit of the person. They recognize the potential vulnerability of persons receiving care and do not exploit their trust and dependency in a way that might compromise the therapeutic relationship. They do not abuse their relationship for personal or financial gain and do not enter into personal relationships (romantic, sexual or other) with persons receiving care.
13. Nurses treat each other, colleagues, students and other health-care providers in a respectful manner, recognizing the power differentials among formal leaders, colleagues and students. They work with others to honour dignity and resolve differences in a constructive way.

#### **E. Maintaining Privacy and Confidentiality**

Nurses recognize the importance of privacy and confidentiality and safeguard personal, family and community information obtained in the context of a professional relationship.

##### ***Ethical responsibilities:***

11. In all areas of practice, nurses safeguard the impact new and emerging technologies can have on patient privacy and confidentiality, professional boundaries, and the professional image of individual nurses and the organizations in which they work (CNA, 2012). They are also sensitive to ethical conduct in their use of electronic records, ensuring accurate data entry and avoiding the falsification or alteration of documentation.

#### **F. Promoting Justice**

Nurses uphold principles of justice by safeguarding human rights, equity and fairness and by promoting the public good.

##### ***Ethical responsibilities:***

8. Nurses work collaboratively to develop a moral community. As part of this community, all nurses acknowledge their responsibility to contribute to positive and healthy practice environments. Nurses support a climate of trust that sponsors openness, encourages the act of questioning the status quo and supports those who

speak out in good faith to address concerns (e.g., whistleblowing). Nurses protect whistle-blowers who have provided reasonable grounds for their concerns.

### **G. Being Accountable**

Nurses are accountable for their actions and answerable for their practice.

#### ***Ethical responsibilities:***

1. Nurses, as members of a self-regulating profession, practise according to the values and responsibilities in the *Code* and in keeping with the professional standards, laws and regulations supporting ethical practice.
2. Nurses are honest and practise with integrity in all of their professional interactions. Nurses represent themselves clearly with respect to name, title and role.

### **SRNA Registered Nurse Entry-Level Competencies (2019)**

#### **2. Professional**

Registered nurses are professionals who are committed to the health and well-being of clients. Registered nurses uphold the profession's practice standards and ethics and are accountable to the public and the profession. Registered nurses demonstrate accountability, accepts responsibility and seeks assistance as necessary for decisions and actions within the legislated scope of practice.

- 2.2 Demonstrates a professional presence, and confidence, honesty, integrity and respect in all interactions.

Professional presence is the demonstration of respect, confidence, integrity, optimism, passion and empathy in accordance with professional standards, guidelines and codes of ethics. It includes a nurse's verbal and nonverbal communications and the ability to articulate a positive role and professional image, including the use of full name and title. The demonstration of professional presence leads to trusting relationships with clients, families, communities and other health care team members. (College of Nurses of Nova Scotia, 2019, p. 2)

- 2.6 Establishes and maintains professional boundaries with clients and the health care team.
- 2.10 Demonstrates fitness to practice.

Fitness to practice are "all the qualities and capabilities of an individual relevant to their practice as a nurse, including but not limited to the freedom from my cognitive, physical, psychological or emotional condition and dependence from alcohol or drugs that impairs their ability to practice nursing" (CNA, 2017b, p. 22).

#### **3. Communicator**

Registered nurses are communicators who use a variety of strategies and relevant technologies to create and maintain professional relationships, share information and foster therapeutic environments.

- 3.3 Uses evidence-informed communication skills to build trusting, compassionate and therapeutic relationships with clients.
- 3.4 Uses conflict transformation strategies to promote healthy relationships and optimal client outcomes.

### **SRNA Registered Nurse Practice Standards (2019)**

#### **Standard 1: Professional Responsibility and Accountability**

The registered nurse is responsible for practicing safely, competently and ethically, and is accountable to the client, public, employer and profession.

The registered nurse upholds this standard by:

- 5. Demonstrating effective collaborative practice, including communication, problem-solving strategies, decision-making and conflict resolution.

#### **Standard 3: Ethical Practice**

The registered nurse applies the principles in the current *CNA Code of Ethics for Registered Nurses* when making practice decisions and using professional judgment. The registered nurse engages in critical inquiry to inform clinical decision-making and establishes therapeutic caring and culturally-safe relationships with clients and the health care team.

The registered nurse upholds this standard by:

- 26. Practicing in accordance with the current *CNA Code of Ethics for Registered Nurses*.
- 27. Identifying the effect of own values, beliefs and experience in relationships with clients, recognizing and addressing potential conflicts.
- 29. Communicating respectfully and effectively in collaboration with client, family, colleagues and others, and resolving conflict should it occur.
- 30. Upholding and maintaining professional boundaries, privacy, and confidentiality with clients.
- 34. Taking action to create a safe work environment that contributes to healthy teams and optimal client outcomes.

#### **Standard 4: Service to Public**

The registered nurse demonstrates leadership in quality and ethical nursing practice, delivery of health care services and establishing professional relationships.

The registered nurse upholds this standard by:

- 35. Demonstrating professional presence and modelling professional behaviour.
- 37. Contributing to a professional ethical and safe practice environment to support the provision of optimal health care outcomes.

**Standard 5: Self-Regulation**

The registered nurse demonstrates an accountability to regulate themselves in accordance with their legislated scope of practice.

The registered nurse upholds this standard by:

49. Practicing in accordance with *The Registered Nurses Act, 1988*, other current relevant legislation, bylaws, scope of practice, standards, entry-level competencies, guidelines and employer policies.
55. Taking measures to maintain fitness to practice ensuring client safety is not compromised.