

**IN THE MATTER OF THE PARAMEDICS ACT AND
SANDY REDIRON AND CHARLENE ROY**

NOTICE OF FORMAL COMPLAINT

TO:

SANDY REDIRON

Beauval, SK S0M 0G0

CHARLENE ROY

Beauval, SK S0M 0G0

WHEREAS:

AT ALL TIMES material to the charges hereinafter set out, you Sandy Rediron (“REDIRON”) and you Charlene Roy (“ROY”) were on the Register (10-9065 / 40-3661) and were members of the Saskatchewan College of Paramedics (SCoP);

AND, at the time of the incidents outlined in the charges below, you were members and held licences from the SCoP to practice the duties of an Emergency Medical Technician (REDIRON) and Emergency Medical Responder (ROY) in Saskatchewan;

AND, the Professional Conduct Committee of the SCoP made a written report recommending that the Discipline Committee hear and determine the formal complaints as follows:

Charge Number 1

You, REDIRON and ROY, are alleged to be guilty of professional misconduct contrary to subsections 25(a), (b) and (c) of The Paramedics Act, 2007, c. P-0.1, in that you wilfully falsified Patient Care Reports (PCRs).

Particulars of the professional misconduct are that:

1. REDIRON and ROY conspired to falsify PCRs.
2. REDIRON told [REDACTED] (“[REDACTED]”) to not sign PCRs at all, and/or to sign PCRs as attendant number three in order to facilitate the falsification of PCRs.
3. On one or more occasion REDIRON did falsify PCRs and on multiple occasions ROY did falsify PCRs to receive payment by signing your names as though you were in attendance despite not taking part in the service call, including:
 - (a) PCR [REDACTED] of February 13th 2008, only ROY, [REDACTED] and [REDACTED] ([REDACTED]) attended the call. REDIRON falsely signed the PCR as attendant.
 - (b) PCR [REDACTED] of February 14th 2008, only REDIRON and [REDACTED] attended the call. ROY falsely signed the PCR as attendant.
 - (c) PCR [REDACTED] of February 15th 2008, only REDIRON and [REDACTED] attended the call. ROY falsely signed the PCR as attendant.
 - (d) PCR [REDACTED] of February 15th 2008, only REDIRON and [REDACTED] attended the call. ROY falsely signed the PCR as attendant.

- (e) PCR [REDACTED] of February 16th 2008, only REDIRON and [REDACTED] attended the call. ROY falsely signed the PCR as attendant.
- (f) PCR [REDACTED] of March 10th 2008, only REDIRON and [REDACTED] attended the call. ROY falsely signed the PCR as attendant.
- (g) PCR [REDACTED] of March 24th 2008, only REDIRON and [REDACTED] had attended the call. ROY falsely signed the PCR as attendant.
- (h) PCR [REDACTED] of May 17th 2008, only REDIRON and [REDACTED] had attended the call. ROY falsely signed the PCR as attendant.
- (i) PCR [REDACTED] of June 7th 2008, only REDIRON and [REDACTED] had attended the call. ROY falsely signed the PCR as attendant.
- (j) PCR [REDACTED] of July 9th 2008, only REDIRON and [REDACTED] had attended the call. ROY falsely signed the PCR as attendant.

The relevant portions of the *Code of Professional Conduct* of SCoP are as follows:

Responsibilities to the Patient

All members shall:

- 4. report any activity deemed non-ethical or illegal to the appropriate authorities;

Responsibilities to the Profession

All members must:

- 2. behave in a way beyond reproach and report any incompetent, illegal or unethical conduct by colleagues or other health care personnel to the appropriate authorities;
- 3. conduct and present oneself in such a manner so as to encourage and merit the respect of the public for members of the profession;
- 7. never use the member's profession, knowledge or skills for unethical gain;
- 9. observe the rules of professional conduct set out in the "Code" in the spirit, as well as in the letter;

Charge Number 2

You, REDIRON and ROY, are alleged to be guilty of professional misconduct contrary to subsections 25(a), (b) and (c) of The Paramedics Act, 2007, c. P-0.1 in that you failed to secure and protect the confidentiality of Patient Care Reports containing confidential health information.

Particulars of the professional misconduct are that:

- 1. The PCR form is a carbon copy form including a top copy (white), a middle copy (yellow) and a bottom copy (pink). The yellow copies of PCRs are to be left at the location where the patient is dropped off and become part of the patient's medical records file at the hospital.

2. Under your supervision, you REDIRON and ROY, allowed yellow copies of PCRs dating back to 2005 to be stored in your local office in [REDACTED] instead of leaving the patient's medical record at the appropriate medical service centre.
3. [REDACTED] reported that ROY showed her a "box" on a shelf in the [REDACTED] office that contained a number of yellow PCR forms. ROY was not permitted to have access to that confidential patient information. ROY asked [REDACTED] not to share that information.
4. Since the SCoP investigation into this matter the yellow copies of PCR's have disappeared from the [REDACTED] office. The missing PCRs have not been located in the patient medical records at [REDACTED] Hospital.
5. As paramedic practitioners, you are trustees with a duty to protect personal health information in compliance with the *Health Information Protection Act*.

The relevant portions of the *Code of Professional Conduct* of SCoP are as follows:

Responsibilities to the Patient

All members shall:

4. report any activity deemed non-ethical or illegal to the appropriate authorities;
5. protect and maintain the patient's safety, dignity and privacy;
7. hold in confidence all personal information entrusted to the member in the health care setting respecting the patient unless failure to disclose would endanger the patient or a third party or the disclosure is required by law.

Responsibilities to the Profession

All members must:

1. be familiar with current legislation and practice within the limitations defined in the member's scope of practice;
2. behave in a way beyond reproach and report any incompetent, illegal or unethical conduct by colleagues or other health care personnel to the appropriate authorities;
3. conduct and present oneself in such a manner so as to encourage and merit the respect of the public for members of the profession;
5. recognize that self-regulation of the profession is a privilege and that each practitioner has a continuing responsibility to merit the retention of this privilege;
9. observe the rules of professional conduct set out in the "Code" in the spirit, as well as in the letter;

Charge Number 3

You, REDIRON, are alleged to be guilty of professional misconduct contrary to subsections 25(a), (b) and (c) of *The Paramedics Act, 2007*, c. P-0.1 in that you engaged and supervised individuals without a valid licence to practice as Emergency Medical Responders (EMRs) contrary to the bylaws of the SCoP.

Particulars of the professional misconduct are as follows:

1. As a full time EMT in [REDACTED], and as supervisor, you arranged scheduling, provided training and supervised the ambulance operations in [REDACTED]. In those roles you had the power to recommend potential employees, and did knowingly, engage and supervise persons who did not hold a valid licence. According to payroll records, you engaged persons without a valid EMR license and allowed them to work as EMRs, including:
 - (a) [REDACTED], casual EMR, from April 20th, 2005 to December 13th, 2010;
 - (b) [REDACTED], casual EMR, from April 18th, 2007 to December 13th, 2010;
 - (c) [REDACTED], casual EMR, from May 5th, 2008 to February 25th, 2009. She was paid several weeks after starting work.
2. In February of 2008, you utilized [REDACTED] knowing that she was not registered as an EMR and only held a C class 4 license and a C PR certificate. According to the SCoP register, [REDACTED] has been registered from May 14, 2008 to present.
3. In February of 2008, you utilized [REDACTED] who only had a C class 4 licence. According to the SCoP register, [REDACTED] status had been "inactive" since 2002. Under your supervision, he attended two service calls on February 13th, 2008 and signed PCR's [REDACTED] and [REDACTED] as an attendant.
4. According to the SCoP register, [REDACTED] Roy has never been registered, nor is there any indication that she has any formal training.

The relevant portions of the *Code of Professional Conduct* of SCoP are as follows:

Responsibilities to the Profession

All members must:

1. be familiar with current legislation and practice within the limitations defined in the member's scope of practice;
2. behave in a way beyond reproach and report any incompetent, illegal or unethical conduct by colleagues or other health care personnel to the appropriate authorities;
3. conduct and present oneself in such a manner so as to encourage and merit the respect of the public for members of the profession;
4. avoid impugning the reputation of any colleague;
5. recognize that self-regulation of the profession is a privilege and that each practitioner has a continuing responsibility to merit the retention of this privilege;
8. strive to improve the professional standards in the member's community and accept a share of the profession's responsibility to society in matters relating to the health and safety of the public, health education and legislation affecting the health or well-being of the community;
9. observe the rules of professional conduct set out in the "Code" in the spirit, as well as in the letter;

10. work with students of their profession while in the clinical setting to provide a scholarly education in a non-threatening helpful manner without misleading or false information.

NOW THEREFORE TAKE NOTICE that the Discipline Committee will hear the charges and such evidence as may be tendered with respect to them starting at 10:00 a.m. in the forenoon on the 24th day of October, 2011 at the Travelodge Hotel Regina (Cumberland East Room) , Regina, Saskatchewan, and from day to day thereafter until the charge has been heard.

AND FURTHER TAKE NOTICE THAT at the said time and place you have the right to be present with counsel and a support person.

AND FURTHER TAKE NOTICE THAT, in default of you attending at the said time and place, the Discipline Committee may, on proof of service of this Notice on you and/or your legal counsel, proceed with the hearing of said charges, and the evidence with respect to them.

AND FURTHER TAKE NOTICE THAT, if the Discipline Committee finds you guilty of professional incompetence and/or misconduct, the Committee may order one or more of the following pursuant to section 31 of *The Paramedics Act, 2007*:

Disciplinary powers

31(1) (a) an order that the member be expelled from the college 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.

31(2) In addition to any order made pursuant to subsection (1), the discipline committee may order:

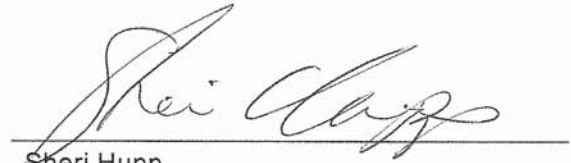
(a) that the member pay to the college, within a fixed period:

(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 professional conduct 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.

DATED at Regina, Saskatchewan, this 29th day of August, 2011.

A handwritten signature in black ink, appearing to read "Sheri Hupp", is written over a horizontal line.

Sheri Hupp
Executive Director
Saskatchewan College of Paramedics