



Indicative Complaint Resolutions and Sanctions Guidance

The role of this guidance is to provide a framework to members of RWPN's Registration and Professional Standards committee when they fulfill their roles as adjudicators in carrying out our Concerns and Complaints policy.

This guidance aims to promote consistency and transparency in decision-making and aims to make all parties, including the registrant, witnesses and the public, aware of our approach to resolving concerns or complaints wherever these have been upheld.

Our approach to fitness to ensuring professional standards

Work with blind, partially sighted and deafblind people, is by definition, work with people who are likely to be viewed by the public as vulnerable, particularly where additional disabilities are present. Professional intervention is often carried out in their own homes. Receipt of vision rehabilitation or habilitation services often comes at a time of particular personal vulnerability.

RWPN is committed to carrying out efficient, effective and appropriate investigations. This ensures that the right action is taken to manage any risk to public protection. We recognise that parties to an investigation may have differing views about the services provided by a registrant and the incident(s) that gave rise to a concern. We are mindful of balancing the full range of views in undertaking our enquiries. Our **Code of Ethics and Professional Conduct (hereafter referred to as The Code)**, our **Continuing Professional Development** requirements and other relevant guidance set out the professional standards that we expect all of our registrants to adhere to. When we consider a concern or complaint the Registration and Professional Standards Committee will assess whether

the matters complained of could amount to a breach of those standards. We take a proportionate, risk-based approach to investigating fitness to practise concerns that are raised with us. Our aim is to enable our decision makers to make decisions that are correct, consistent, evidence-based and fair at the earliest opportunity.

The principle we will take is one that will address a concern or complaint in as quick and effective a manner as possible, provided it meets the needs of all parties, including maintaining the integrity of professional registration.

Resolving concerns and complaints - a two-stage process

Where a concern or complaint meets our threshold for investigation, and where there it is not immediately apparent that an Interim Suspension Order (see below) is required, the matter will be investigated by an **Initial Investigating Panel**.

Where the Initial Investigating Panel considers that the concern or complaint is upheld, but that the matter does not require a Professional Conduct Panel, a range of **resolutions** will be available.

However, if the concern or complaint cannot be resolved satisfactorily by the Initial Investigating Panel will need to decide if it will proceed to a **Professional Conduct Panel**. For a concern or complaint to go forward, the Initial Investigating Panel will need to decide: a) there is a realistic prospect of being able to prove the concern about our complaint against the registrant; b) if so, are the allegations so significant to indicate that their suitability to practice is, or may be, impaired to a degree that justifies action being taken on their registration with RWP.

The Initial Investigating Panel should bear in mind that it is for the Professional Conduct Panel to prove the alleged facts and to prove that the registrant's fitness to practise is currently impaired and not for the registrant to disprove the facts or to demonstrate their fitness to practise. They will also need to consider whether it will be possible a) to establish the facts b) establish whether those facts amount to the grounds of the concern or

complaint (e.g. misconduct, lack of competence, deliberate misuse of information) and c) in consequence of a) and b), establish that fitness to practise is likely to be impaired. They will also need to bear in mind that the Professional Conduct Panel will consider whether the facts have been proved on the balance of probabilities (rather than beyond reasonable doubt). In other words, the Professional Conduct Panel must be satisfied that it is more likely than not that an event happened.

If the concern or complaint is upheld after a Professional Conduct Panel (and subject to any appeal), then the range of outcomes would be classed as **sanctions**. Sanctions are notified on the professional register, whereas any resolutions are not publicised.

Proportionality

In deciding what resolution or sanction, if any, to impose, either Panel must act proportionately and balance the interests of the registrant with those of the public. The Panels should consider all available options, starting with the least restrictive. In the case of sanctions, any restrictions on the registrant's ability to practise should be no more than necessary to satisfy the public interest, which includes the protection of the public.

Mitigating and aggravating factors

When deciding on a resolution or sanction either Panel must have due regard to any evidence given by way of mitigation or aggravation.

Mitigation can be considered in three broad categories:

1. Evidence of the registrant's insight and understanding of the issue and their attempts to address it. This may include, amongst other things, early admission of the facts, remorse, apologies to the complainant and attempts to correct the shortcomings.

Insight Insight is a registrant's genuine understanding and acceptance of the concerns, which have been raised in relation to

their conduct or competence. It is likely to be demonstrated by: a genuine recognition of the concerns raised; an understanding of the impact or potential impact of their actions; and demonstrable empathy for the client(s) involved (if applicable). Genuine insight is likely to be demonstrated by timely remorse, apology and remediation, exhibited ahead of any Panel hearing. Whilst insight expressed during a hearing may be taken into account, insight expressed in advance is likely to carry more weight.

Remorse Expressing remorse involves a registrant taking responsibility and exhibiting regret for their actions, and may be demonstrated by one or more of the following: acknowledging wrongdoing; giving an apology; and undertaking appropriate remediation.

Apology Health and social care professionals have a duty of candour; a professional responsibility to be open and honest when things go wrong with the care, treatment or service that they have provided. In assessing the sincerity of an apology, the panel should take account of the timing and level of remorse and insight the registrant has shown, and the presence and nature of any remediation they have undertaken.

2 Evidence of the registrant's overall adherence to good practice. This may include, amongst other things, demonstration of regular supervision, an up-to-date CPD portfolio, the registrant's good character or history supported by testimonials from colleagues.

3. Personal mitigation. This may include, among other things, periods of stress or illness, personal and financial hardship, level of experience at the time, time elapsed since the incident(s) occurred and level of support in the workplace.

Aggravating factors relating to the facts found by either Panel relating to the facts established by the Panel might include factors such as:

- the registrant's behaviour during the investigative process;
- lack of insight or shown by the registrant into the consequence of the behaviour;
- lack of remorse shown by the registrant and/or lack of any apology

- the level of experience of the registrant;
- previous concerns or complaints against the registrant where the events have been found or proven;
- whether the registrant abused a position of trust.

The Professional Conduct Panel should be mindful that they do not give disproportionate weight to whether or not a registrant has been subject to an Interim Suspension Order. Such Orders are not a finding of fact and are not an indication of a concern or complaint being upheld or dismissed. However, any breaches of an Interim Suspension Order may be relevant in a Professional Conduct Panel's assessment of the registrant's insight and attitude, and whether they would be likely to comply with any sanction given.

Resolutions from an Initial Investigating Panel

Each of the three options below or a combination of the three may be employed for resolution at this stage.

1. A verbal or written apology

This will generally only be appropriate where the proven or admitted allegations are of a minor and isolated nature and the registrant fully understands the nature and effect of the infringement of our Code. The Panel may want to consider if the registrant has shown genuine remorse and whether it is likely that the complainant would be open to receiving an apology. If an apology has already been given by the registrant this may not be an appropriate resolution but may be a relevant matter of mitigation

2. A written warning

A written warning from the Initial Investigating Panel to the registrant may be appropriate where the breach of the Code is at the lower end of the scale and the Panel wants to make it clear to the registrant that such behaviour was unacceptable and should not be repeated and that a further breach of the same nature may result in a Professional Conduct Panel hearing. A written warning is unlikely to be the only resolution that is identified in situations where the registrant has shown a lack of understanding or insight into their behaviour. A letter

of warning is unlikely to be appropriate where the registrant has shown a lack of understanding or insight into their behaviour AND there is a risk of repetition.

3. Further training/development agreement

The Panel may require the registrant to undertake further training/development in one or more specific areas in order to remedy any shortcomings identified during the concerns and complaints process. This outcome may be appropriate where the registrant has shown poor or insufficient awareness or knowledge of aspects of professional behaviour and/or it has been demonstrated that the registrant lacks the immediate knowledge or experience that is required to remediate their behaviour.

This outcome may also be appropriate where the registrant has shown poor or insufficient knowledge of some technical aspects of professional practice. For an outcome in relation to knowledge of technical aspects of professional practice, the Panel will need to be satisfied that practising with this current level of knowledge has not and does not, cause obvious risk of harm to the public AND can be remedied by training or development.

Note: This outcome would not be appropriate where the deficiencies in practice (technical or behavioural) that have been identified are fundamental aspects of professional practice. Where the deficiencies in practice are fundamental and are shown to be serious and where a continuation of practice may create risk of harm to the public and/or to themselves, this would be a matter for a Professional Conduct Panel, or - in exceptional circumstances - an Interim Suspension Order.

The purpose of further training or development is to enable the registrant to remedy the deficiencies in their practice or knowledge. The Panel must provide clear, concise direction to the registrant, including the outcomes the training should address and the time-frame within which it should be completed. Where the area of training would normally fall within the learning and development

programme of their employer, the registrant should be encouraged to source it from their employer. Where the area of training is more specialist, RWPN should support the registrant to seek appropriate training, help or guidance. This may be in the form of specific training or may be in the form of specialist supervision or mentoring. The Panel may request to see evidence or testament of any training or development that is specified. Refusal to undertake such training, or not undertaking it within the specified time without extenuating circumstances would be a matter for a Professional Conduct Panel.

Interim Suspension Orders

An **Interim Suspension Order** can be made so that the registrant is temporarily suspended from the register pending the outcome of a Professional Conduct Panel. The Initial Investigating Panel must be satisfied that there is a real continuing risk (actual or potential) to the public, the registrant or their colleagues if an Interim Suspension Order is not made.

In deciding whether or not to impose an Interim Suspension Order the Panel must consider the seriousness of the allegation(s); whether the allegation(s) form part of a safeguarding alert; whether public confidence in the profession is likely to be seriously damaged if the registrant continues to hold unrestricted registration during the period of their suspension; the impact on public safety should the allegation(s) be proved.

In this situation, the Initial Investigating Panel, in consultation with the chair of RWPN's Registration and Professional Standards committee, will agree an Interim Suspension Order with the registrant. This Order will remain in place until the outcome of the Professional Conduct Panel and any appeal. The issuing of an Interim Suspension Order is a precautionary measure and does not indicate that the concern or complaint has been upheld in part or in full.

Sanctions

The purpose of sanctions

Sanctions are available to a Professional Conduct Panel when they have identified that a registrant is not currently fit to be on RWP professional register, or is not currently fit to be on the register without any restrictions or limitations.

The purpose of sanctions is to protect the public and to uphold the reputation and standards of the profession. The purpose of a sanction is not to punish the registrant but to enable them to return to safe practice where possible. If the Panel determines that a registrant poses a risk to those who may need their services in the future, the Panel must determine what level of public protection is required and is proportionate.

Conditions of Practice Order

A Conditions of Practice Order provides a flexible way of concluding a case. A Conditions of Practice agreement requires a registrant to comply with certain conditions for a specific timeframe, for a maximum of 12 months. This particular type of sanction allows the registrant to continue to practise subject to certain restrictions. This will be the most appropriate sanction where a failure is capable of being remedied within this timeframe and where the panel is satisfied that allowing the registrant to continue to practise (albeit with restrictions) will not pose a risk of harm to the public. The Panel must be satisfied that the registrant has displayed insight into their failings and willingness to respond positively to any stipulated conditions.

Any conditions imposed through a Conditions of Practice Order should be remedial or rehabilitative in nature. The conditions should be relevant to the failings identified. The conditions should be practical and workable for all parties, easy to monitor (to know if they have been achieved) and be clear to the registrant so that they know what is expected of them.

Conditions of Practice may have an affect on the registrant's ability to fulfill the full range work commitments for their employer. The Conditions may require the registrant to notify their employer and to adapt their duties accordingly. Conditions of Practice may require the registrant to notify

RWPN if they leave current employment or intend to take up employment elsewhere.

Conditions of Practice will be notified on the register but no health information will be disclosed.

Sanction Options:

1. Caution placed on the registrant's public record

A public caution may be appropriate where the breach of the Code has occurred but the registrant has admitted to the breach, has shown insight into their behaviour and has presented compelling reasons why mitigating factors have led directly to the cause of the breach. The registrant should be made aware that any repetition of the breach (or similar breaches) within the agreed timeframe would lead to suspension or permanent removal from the register.

Where the registrant shows lack of understanding or insight into their behaviour this sanction is unlikely to be appropriate.

A caution does not prevent the registrant from practising.

A caution can remain on the register for a period up to five years.

2. Condition of Practice Order - supervision agreement

A supervision agreement may require the registrant to undertake a specified number of supervision sessions or undertake additional supervision over a specified time period (not above 12 months). Supervision will generally be either to request that the registrant explores topics, themes or technical issues in order to broaden their awareness and understanding of issues raised during the Concerns and Complaints process or it may be used as an additional safeguard in order to protect the public and ensure that the registrant has adequate support to work through any difficulties that might arise.

The Panel must make clear to the registrant the goals of any supervision, the duration of the arrangements and the nature of any reports required from the supervisor, particularly at the conclusion of the arrangement. Where the type of supervision required is specialist

technical supervision and where current arrangements are not appropriate, the Panel may direct RWPB to support the registrant in sourcing a supervisor or mentor and should be mindful of the cost incurred by the registrant or employer and mindful of any pre-existing supervision arrangements.

The Panel may require a written report from the registrant and their supervisor in order to determine whether the goals set have been met. If the Panel does not believe that the goals set have been adequately met without good reason, it may determine a further sanction is necessary.

3. Condition of Practice Order - restriction of practice pending re-training

A restriction of practice pending re-training may be appropriate where the registrant has shown poor or insufficient knowledge of some technical aspects of professional practice and where the Panel is satisfied that practising with this current level of knowledge *in this/these particular area(s) of practice* may cause risk of harm to the public if no action were taken.

A sanction relating to a restriction of practice should be applied where the registrant has shown poor or insufficient awareness or knowledge of the deficiency in question. This sanction should only be applied where the Panel believes the deficiency can be remedied by training and where the registrant is likely to undertake the training within the timeframe.

When finding deficiencies in aspects of technical skills or knowledge the Panel should view the entire area of practice in a wide scope. For example, where sufficiently poor practice has been identified aspects of outdoor Orientation and Mobility training, the restriction to practice is likely to cover all outdoor Orientation and Mobility training (but *not necessarily* indoor Orientation and Mobility training).

This sanction is unlikely to be appropriate where the Panel finds that the registrant has been practising with poor or insufficient knowledge or skill in fundamental and risk-intensive areas of practice AND has been doing this with knowledge and awareness of this. Given the

nature of the ethical breach inherent in such a finding, removal from the register will be the more appropriate action.

The purpose of further training is to enable the registrant to remedy the deficiencies in their practice or knowledge. The Panel must provide clear, concise direction to the registrant, including the outcomes the training should address and the time-frame within which it should be completed. RWPB may support the registrant to seek appropriate training, help or guidance and RWPB would also expect the employer to support such training.

This sanction may be linked to a requirement for more regular or frequent technical supervision or mentoring to support the registrant in returning to unrestricted practice.

RWPB's Registration and Professional Standards committee will request to see evidence or testament of successful completion of any training before Conditions of Practice are lifted. Refusal to undertake such training, or not undertaking it within the specified time without extenuating circumstances would be likely to lead to a more restrictive level of sanction.

4. Suspension from the register

A suspension order is likely to be appropriate where there are serious concerns which cannot be reasonably addressed by a Conditions of Practice order, but which do not require the registrant to be removed from the register. These types of cases will typically exhibit the following factors:

- the concerns represent a serious breach of the Code;
- the registrant has insight;
- the issues are unlikely to be repeated; and
- there is evidence to suggest the registrant is likely to be able to resolve or remedy their failings.

A registrant may be suspended from RWPB's register for a period no greater than 12 months. A registrant who is suspended from our register should not be undertaking tasks that only a fully qualified Vision Rehabilitation Worker or Habilitation Specialist should undertake.

Suspension from the register may be used to send out a signal to the registrant, the public and the profession about what is regarded as poor or dangerous practice. Suspension from the register may have a bearing on the relationship between registrant and employer (though the employer may still choose to deploy the registrant to other duties).

A staged return to practice is likely to be appropriate in cases involving substance dependency and where the continuation of practice may place the registrant and public at risk and where - at the time of the hearing - the registrant is seeking or undergoing treatment (and the panel has received medical evidence confirming this to be the case) but has not reached the stage where they are safe to return to practice, even if that registrant is subject to conditions of practice. In these cases, the panel should clearly explain the purpose of the sanction and the expectations it has of the registrant.

5. Removal from the register

Removal from the register means that the registrant's name is removed from RWPB's professional register and, as with all sanctions, this termination of registration will be published on our website. Where appropriate an employer will be notified of this.

Removal from the register is a sanction of last resort for *serious, reckless, malicious and/or persistent*:

- **Dishonesty**
- **Discrimination**
- **Abuse of professional position**
- **Sexual misconduct**
- **Criminal convictions and cautions**
- **Violence**

See appendix for fuller description.

Removal from the register should be used when the Panel considers there is no other way to sufficiently protect the public or there is an

unwillingness by the registrant to show insight or resolve their failings. Removal from the register may also be appropriate when there is no other way that public confidence in the profession can be maintained if the registrant is permitted to remain on the register. In deciding on this level of sanction the Panel must state clearly their reasons why a lesser form of sanction is not appropriate.

Removal from the register is a long-term solution and a registrant cannot apply to be readmitted within three years. Registrants removed from RWPN's register can apply for restoration to the register after three years. They must submit a report to show what they have learned from the experience. The report must be submitted along with a supporting reference from either their line manager or from a professional supervisor registered with RWPN.

The reports must be submitted to RWPN and will be considered by a meeting of the Professional Conduct Panel and the former registrant will be informed in writing of the decision, and the reasons for it.

Appendix - Serious cases

Dishonesty

Dishonesty undermines public confidence in the profession and can, in some cases, impact the public's safety. Dishonesty, both in and outside the workplace, can have a significant impact on the trust placed in those who have been dishonest, and potentially on public safety. It is likely to lead to more serious sanctions. The following are illustrations of such dishonesty:

- putting false information in a service user's record (including in an attempt to cover up misconduct or a lack of competence);
- providing untruthful information in job applications (perhaps misleading the prospective employer about experience, training or skills gained);
- using equipment, devices or services meant for service users;
- fraud, theft or other financial crime.

Given the seriousness of dishonesty, cases are likely to result in more serious sanctions. However, panels should bear in mind that there are different forms, and different degrees, of dishonesty, that need to be considered in an appropriately nuanced way. Factors that panels should take into account in this regard include:

- whether the relevant behaviour took the form of a single act, or occurred on multiple occasions;
- the duration of any dishonesty;
- whether the registrant took a passive or active role in it;
- any early admission of dishonesty on the registrant's behalf;
- any other relevant mitigating factors. Failure to raise concerns

Discrimination

It is unlawful to discriminate against someone because they have, or are perceived to have, a protected characteristic, or are associated with someone who has a protected characteristic. Those characteristics are: age; disability; gender reassignment; marriage and civil partnership; pregnancy and maternity; race; religion and belief; sex; and sexual orientation.

Unlawful discrimination is unacceptable in modern society and standard. There can be serious consequences for public safety and confidence in the profession where a registrant discriminates against individuals with a protected characteristic, for example where a registrant:

- treats a service user or carer differently and worse than others because of who they are, or because of someone they are connected to;
- refuses to provide a service user with a service or take them on as a client;
- behaves in a way which causes the service user or carer distress, or offends or intimidates them;
- or punishes a service user or carer for complaining about discrimination or helping someone else to complain.

For the reasons set out above, where a Panel finds a registrant impaired and this involves unlawful discrimination, it is more likely to impose a serious sanction.

Abuse of professional position

Inappropriate relationships

Where a registrant uses their professional status to pursue inappropriate relationships with service users or carers this may undermine the care or treatment provided and the public's trust in the profession. Registrants should take care to set clear boundaries, and avoid conduct which strays beyond that typically expected of a therapeutic / professional relationship. When considering whether a relationship is inappropriate, a Panel should have particular regard for:

- evidence that the registrant's professional status was a coercive factor in the relationship's instigation;
- evidence of predatory behaviour;
- evidence that the service user or carer is particularly vulnerable;
- evidence that the relationship is of a sexual or otherwise inappropriate emotional nature.

Former service users

If a registrant forms a personal relationship with a former service user or carer, this may still be inappropriate. In determining whether or not the registrant has abused their professional position, the panel should consider:

- the nature of the previous professional relationship;
- the length of time since the professional relationship ended;
- if there is evidence that the registrant used their professional relationship to facilitate a personal relationship (actual or prospective) with a service user or carer and, having done so, ended the professional relationship with that person. The panel may consider a failure in any such situation to secure appropriate alternative professional treatment, care or support for the service user or carer to be an aggravating factor;
- the vulnerability of the service user or carer;
- whether the registrant is involved in the care or treatment of other members of the family.

Predatory behaviour

A registrant's behaviour should be considered predatory where they are seen to take advantage of others, motivated by a desire to establish a sexual or otherwise inappropriate relationship with a service user or carer. The panel should take predatory behaviour particularly seriously, as there will often be significant risk to the targeted service user or carer. Predatory behaviour might include attempts to contact service users or carers using information accessed through confidential records (for example, visiting a service user's home address without authority or good reason to do so), or inappropriate use of social media to pursue a service user or carer. Any evidence of predatory behaviour is likely to lead to more serious sanctions.

Vulnerability

Registrants must not abuse a service user or carer's trust. This is especially so where they might already be particularly vulnerable to such abuse. Given the unequal balance of power between registrants and service users or carers, any service user or carer accessing treatment is vulnerable to some extent. However, a service user or carer is considered particularly vulnerable if they are unable to take care of themselves, or are unable to protect themselves from significant harm or exploitation.

This might include factors such as:

- mental illness (including dementia);
- age (for example, children under 18 or the elderly);
- disability; lack of capacity; history of abuse or neglect; bereavement.

Where a registrant has pursued a sexual or otherwise inappropriate emotional relationship with a particularly vulnerable service user or carer, panels should consider this an aggravating factor which is likely to lead to a more serious sanction.

Sexual misconduct

Sexual misconduct is a very serious matter which has a significant impact on the public and public confidence in the profession. It includes, but is not limited to, sexual harassment, sexual assault, and any other conduct of a sexual nature that is without consent, or has the effect of threatening or intimidating someone. The misconduct can be directed towards: service users, carers and family members; colleagues; and members of the public.

Because of the gravity of these types of cases, where a panel finds a registrant impaired because of sexual misconduct, it is likely to impose a more serious sanction. Where it deviates from this approach, it should provide clear reasoning.

Sexual abuse of children

Sexual abuse of children involves forcing or persuading them to take part in sexual activities and includes both physical contact and online activity. Each of the four countries of the UK has legislation which protects children from sexual abuse.

Sexual abuse of children, whether physical or online, is intolerable, seriously damages public safety and undermines public confidence in the profession. Any professional found to have participated in sexual abuse of children in any capacity should not be allowed to remain in unrestricted practice.

Criminal convictions and cautions

A conviction or caution should only lead to further action being taken against a registrant of RWPB if, as a consequence of that conviction or caution, the registrant's fitness to practise is found to be impaired.

The panel's role is not to punish the registrant, but to protect the public, which includes maintaining high standards among registrants and public confidence in the profession concerned. Where a registrant has been convicted of a serious criminal offence, and is still serving a sentence at the time the matter comes before a Panel, normally the panel should not allow the registrant to resume unrestricted practice until that sentence has been satisfactorily completed. Likewise, if a registrant has a conviction or caution for a less serious offence which nevertheless had an impact on fitness to practise, typically panels should not permit the registrant to resume unrestricted practice.

Where the panel deviates from the approach outlined above, it should provide clear reasoning.

Sex offender

Although inclusion on the sex offenders' database is not a punishment, it does serve to protect the public from those who have committed certain types of offences. A panel should normally regard it as incompatible with the RWPB's obligation to protect the public to allow a registrant to remain in or return to unrestricted practice while they are on the sex offenders' database. Where the panel deviates from this approach, it should provide clear reasoning.

Offences related to indecent images of children

Under the Protection of Children Act 1978 it is illegal to take, make, distribute, show or advertise indecent images of children. The courts categorise offences relating to indecent images of children based on the nature of the images and the offender's degree of involvement in their production. Any offence relating to indecent images of children involves some degree of exploitation of a child, and so a conviction for such an offence is a very serious matter. In particular, it undermines the public's trust in registrants and public confidence in the profession concerned and is likely to lead to a more serious sanction.

Community sentences

Community sentences are non-custodial sentences aimed at punishing offenders' behaviour so they don't commit crime in the future, and are used to address different aspects of an individual's offending behaviour.

Therefore they may not simply be an order to undertake unpaid community work but may also include other orders such as: compliance with a curfew; exclusion from certain areas; or participation in mental health, drug or alcohol treatment. Panels need to give careful consideration to the specific terms of any community sentence but, generally, it will be inappropriate to allow a registrant to remain in, or return to, unrestricted practice whilst they are subject to such a sentence. Should the panel wish to depart from this approach, it should provide clear reasoning.

Violence

Where a registrant has exhibited violent behaviour, this is highly likely to affect the public's confidence in their profession and pose a risk to the public. In these cases, a more serious sanction may be warranted.

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