Review Board File number: HPRB-HPA-

Submitted to the Review Board and copied to the College and Registrant(s) on

**Model Statement of Points**

**for Complainants in a Review of an Inquiry Committee Disposition**

|  |  |
| --- | --- |
| * This model statement of points aims to make the review process easier for complainants by providing a possible starting point for submissions | * Using or not using this model does not give a complainant any advantage or disadvantage in the review |
| * If you use this model, you are not limited to the suggestions in it, and you do not need to fill out all of it. Just delete the parts you do not need, and add others if you wish. **Remember to note relevant page numbers in the Record** | * Please limit submissions to no more than 10 pages. Do not submit CDs, USB thumb drives or other physical media, and make sure any electronic material other than PDF, such as audio files, is readable with standard office software |
| [Click here for more information about the Complainant’s Statement of Points for an Inquiry Committee Disposition Review](https://www.bchprb.ca/app/uploads/sites/791/2022/05/HPRB-Statement-of-Points-Inquiry-Committee-Disposition.pdf)  **\*These instructions may be deleted when completed** | |

**Part 1: Adequacy of the Investigation**

*(*An adequate investigation meets the goals of the investigation*:* [*The College of Physicians and Surgeons of British Columbia v. The Health Professions Review Board, 2022 BCCA 10*](https://www.bccourts.ca/jdb-txt/ca/22/00/2022BCCA0010.htm)*)*

1. The college did / did not correctly state the goal of the investigation because…

…

1. The college should have investigated these things, but it did not…
2. …
3. …
4. The college did not interview or contact [witness or other person]. This person would have provided information about…
5. The college did not seek additional information or clarification about…
6. The college did not meet the goal of the investigation because…
7. …

**Part 2: Reasonableness of the Disposition**

*(*A reasonable decision is one that is based on an internally coherent and rational chain of analysis and that is justified in relation to the facts and law transparent, intelligible, and justified*:* [*Canada (Minister of Citizenship and Immigration) v. Vavilov, 2019 SCC 65*](https://decisions.scc-csc.ca/scc-csc/scc-csc/en/item/18078/index.do)*)*

1. The inquiry committee’s decision was not consistent, rational or logical or did not make sense to me because:
2. …
3. …
4. The inquiry committee did not explain

1. why they did not criticize the registrant or find fault with the registrant’s practice
2. how the disposition protects the public interest
3. …
4. These are college bylaws, standards of practice, code of ethics or practice guidelines that I believe the Registrant did not comply with:
   1. …
   2. …
5. The inquiry committee did not explain how the Registrant complied with them.

1. …
2. …
3. These review board decisions or court judgments published on the [CanLII website](https://www.canlii.org/en/bc/bchprb/) support my case because:
4. …
5. …
6. …

**Part 3: Request for Review Board Action**

1. In my application I asked the review board to:
2. …
3. …
4. The review board should order the college to do this because:
5. …
6. …