STATEMENT OF ALLEGATIONS

CHRISTINE GALLEY Registration number 023464

IT IS ALLEGED THAT:

- 1. At the material times, Christine Galley ("Ms. Galley") was duly registered with NANB as a Registered Nurse.
- 2. On or about March 10, 2023, Ms. Galley committed acts of professional misconduct as defined in subsection 2(1) of the *Nurses Act* in that, while working as a Registered Nurse at the [] Hospital (the "Hospital"), she digressed from established or recognized professional standards or rules of practice of the profession, including but not limited to the NANB *Standards of Practice for Registered Nurses*, in one or more of the following ways:
 - a. Ms. Galley was the day supervisor on March 10, 2023, when she decided to assign a Graduate Nurse ("GN") to work in the Palliative Care Unit. No other Registered Nurse was working on that unit at that time, which meant the GN was in charge of the Palliative Care Unit.
 - b. While working as the only nurse on the Palliative Care Unit, the GN made a serious medication error involving a ninety-six (96) year old male palliative patient (the "Patient"). The Patient's condition subsequently deteriorated and he died on March 14, 2023 as a result of accidental drug toxicity (morphine).
 - c. Ms. Galley was not present at the time of the medication error.
 - d. Ms. Galley's decision to assign the GN as the only nurse on the Palliative Care Unit, which effectively placed the GN in charge of the Palliative Care Unit, violated NANB Rule 1.19(c) as summarized in NANB's *Fact Sheet: Graduate Nurse Scope of Practice*, which prohibits GNs from being in charge of a nursing unit.
 - e. Ms. Galley's decision to assign the GN as the only nurse on the Palliative Care Unit, which effectively placed the GN in charge of the Palliative Care Unit, violated the Hospital's Graduate Nurse Policy, which prohibits GNs from being in charge of a nursing unit.
 - f. Ms. Galley failed to practice in accordance with relevant regulatory requirements and employer policy, as required by section 1.2 of the NANB Standards of Practice for Registered Nurses.
 - g. Ms. Galley failed to recognize or take action in a situation where client safety was potentially or actually at risk, as required by section 1.6 of the NANB **Standards of Practice for Registered Nurses**.

- h. Ms. Galley failed to exercise reasonable judgment as required by section 2.5 of the NANB **Standards of Practice for Registered Nurses**.
- i. Ms. Galley failed to assign and delegate nursing activities in accordance with the roles and competence of other providers and the requirements of the practice setting, as required by section 2.7 of the NANB *Standards of Practice for Registered Nurses*.
- j. Ms. Galley failed to practice in collaboration with members of the health care team while understanding and respecting other team members' scope of practice and contributions in the delivery of safe, competent, compassionate and ethical care, as required by section 4.7 of the NANB Standards of Practice for Registered Nurses.