

**DISCIPLINE COMMITTEE OF THE
ONTARIO COLLEGE OF SOCIAL WORKERS AND SOCIAL SERVICE WORKERS**

Indexed as: Ontario College of Social Workers and Social Service Workers v Stephanie Brash, 2026 ONCSWSSW 1

Date: 20260217

BETWEEN:

THE ONTARIO COLLEGE OF SOCIAL WORKERS
AND SOCIAL SERVICE WORKERS

- and -

STEPHANIE BRASH

PANEL:	Sue Oliver	Chair, Professional Member
	Charlene Crews	Professional Member
	Carina Chan	Public Member

Appearances: Debra McKenna, counsel for the College
Zoë Hountalas, counsel for the Registrant
Andrea Gonsalves, Independent Legal Counsel to the Panel

Heard: February 9, 2026

DECISION AND REASONS FOR DECISION

[1] This matter came on for hearing by videoconference before a panel of the Discipline Committee (the “**Panel**”) of the Ontario College of Social Workers and Social Service Workers (the “**College**”) on February 9, 2026. The Panel announced our decision on the misconduct allegations, penalty and costs orally on the record at the hearing. These are our reasons for decision.

The allegations

[2] In the Notice of Hearing dated December 15, 2024, the Registrant is alleged to be guilty of professional misconduct pursuant to s. 26(2) of the *Social Work and Social Service Work Act, 1998*, SO 1998, c 31 (the “**Act**”) in that she is alleged to have engaged in conduct that contravenes the Act, Ontario Regulation 384/00 (the “**Professional Misconduct Regulation**”), Schedule “A” to By-law No. 66 of the Ontario College of Social Workers and Social Service Workers, being the

Ontario College of Social Workers and Social Service Workers Code of Ethics (the “**Code of Ethics**”), and Schedule “B” to By-law No. 66 of the Ontario College of Social Workers and Social Service Workers, being the Ontario College of Social Workers and Social Service Workers Standards of Practice Handbook (the “**Handbook**”).

[3] The factual particulars of the allegations against the Registrant as set out in the Notice of Hearing are as follows:

1. You are, and were at all times relevant to these allegations, a registered social service worker with the Ontario College of Social Workers and Social Service Workers (the “College”).
2. During the relevant period, you were employed by [employer] in [location], Ontario as a Work Readiness and Retention Specialist.
3. In this role, you provided hands-on skills development and other supports to [Employer]’s clients as part of [Employer]’s Employment Services Program. Among other responsibilities, you were involved with co-ordinating and delivering training workshops to [Employer] clients, maintaining regular follow-up with clients, and/or developing a rapport with clients to build trust and effective communication pathways to assist clients with securing or retaining employment.
4. While in your role as a Work Readiness and Retention Specialist at [employer], you provided services and support to Client A between the period from approximately March 2023 to April 2024. The Client had been referred to [Employer] by Ontario Works for assistance with job readiness and job searching.
5. You were aware that Client A was a vulnerable client and, among other barriers in relation to employment, the Client suffered from disabilities arising from mental health issues, including addiction.
6. In your role at [Employer], you were in direct contact with the Client with outreach support, including, among other assistance, meeting with the Client, providing feedback to the Client about resumes and job applications, and providing advice related to interviews.
7. During the period in which you provided services to Client A, you failed to meet the standards of the profession, failed to maintain appropriate boundaries, and/or engaged in an inappropriate personal and sexual relationship with Client A, including but not limited to:
 - a. developing romantic and/or sexual feelings for Client A and taking no steps to draw boundaries;
 - b. communicating with Client A on your personal phone;
 - c. exchanging inappropriate texts and/or emails with Client A;
 - d. meeting with Client A for reasons unrelated to providing services on behalf of [Employer]; and/or

e. engaging in a sexual activity with Client A, including sexual intercourse.

[4] The College alleges in the Notice of Hearing that by reason of engaging in some or all of the conduct outlined above, the Registrant is guilty of professional misconduct as set out in ss. 26(2)(a) and (c) of the Act, as follows:

- (a) In that you violated sections 2.2 and 2.10 of the Professional Misconduct Regulation and Principle I of the Handbook (commented on in Interpretations 1.7 and/or 1.8) by:
 - i. failing to be aware of and reflecting upon your values, attitudes, assumptions and biases and how these impact your professional relationships with clients.
 - ii. failing to distinguish your needs and interests from those of your clients to ensure that the client's needs and interests remained paramount.
- (b) In that you violated section 2.5 of the Professional Misconduct Regulation by abusing a client sexually, verbally psychologically or emotionally, including sexually abusing a client withing the meaning of subsection 43(4) of the *Act*;
- (c) In that you violated sections 2.2 and 2.5 of the Professional Misconduct Regulation and Principle VIII of the Handbook (as commented on in Interpretations 8.1, 8.2, 8.3, 8.4, 8.5, 8.6, 8.7, and/or 8.10) by:
- (d) In that you violated sections 2.2, [*withdrawn*] and 2.10 of the Professional Misconduct Regulation and Principle II of the Handbook (commented on in Interpretations 2.2, 2.2.1, 2.2.2, 2.2.4., 2.2.5, [*withdrawn*], and/or 2.2.12) by:
 - i. failing to recognize that you were in a position of power and responsibility to the client and responsible for ensuring that the client was protected from the abuse of such power during and after the provision of professional services;
 - ii. failing to establish and maintain clear and appropriate boundaries for the protection of the client;
 - iii. practicing in a conflict of interest when you had a personal interest that influenced how you carried out your professional responsibilities;
 - iv. engaging in sexual relations with a client;
 - v. providing social service work services to a client with whom you were having sexual relations;
 - vi. [*withdrawn*]
 - vii. engaging in conduct that could reasonably be perceived as reflecting negatively on the profession of social service work;
- (e) In that you violated Section 2.28 of the Professional Misconduct Regulation;

- (f) In that you violated Section 2.36 of the Professional Misconduct Regulation by engaging in conduct or performing an act relevant to the practice of the profession that, having regard to all circumstances, would reasonably be regarded by members as disgraceful, dishonourable or unprofessional.

[5] At the hearing, the College sought leave to withdraw parts of allegation (d), which the Panel granted.

Registrant's position

[6] The Registrant admitted to the allegations set out in the Notice of Hearing, except the withdrawn parts of allegation (d). The Panel conducted an oral plea inquiry at the hearing. Additionally, in the Agreed Statement of Facts filed by the parties (discussed further below), the Registrant confirmed in writing her understanding of the nature of the allegations against her, that she was voluntarily admitting to the allegations, and that she understood the consequences of admitting to the misconduct.

[7] The Panel was satisfied that the Registrant's admissions were voluntary, informed and unequivocal.

The evidence

[8] The evidence was tendered by way of an Agreed Statement of Facts, the relevant parts of which are as follows:

A. Introduction

1. The Registrant graduated from Mohawk College in June 2021 with a diploma in social service work. She registered with the College as a Social Service Worker on April 4, 2022.
2. At all times material to the allegations in the Notice of Hearing dated December 12, 2024 (appended as **Exhibit "A"**) [*omitted from these Reasons*], the Registrant was registered with the College as a Social Service Worker.
3. Other than the allegations set out in **Exhibit "A"**, the Registrant has no prior discipline or complaint history with the College.
4. The Registrant has permanently resigned her registration with the College.

B. Registrant's Employment

5. From April 2021 to May 2024, the Registrant was employed at [Employer] in [location], Ontario. The Registrant was employed in the role of Work Readiness and Retention Specialist.
6. The Registrant reported her employment at [Employer] to the College, which was posted to the College's public register.

7. [Employer] is a registered charity that provides support to marginalized individuals in overcoming barriers with respect to employment. In her role, the Registrant provided hands-on skills development and other supports to [Employer]'s clients as part of [Employer]'s Employment Services Program.
8. Among other responsibilities, the Registrant was involved with co-ordinating and delivering training workshops to [Employer] clients, maintaining regular follow-up with clients, and developing a rapport with clients to build trust and effective communication pathways to assist clients with securing or retaining employment.
9. The Registrant acknowledges that some of her responsibilities, as outlined in paragraph 8, fall within the scope of practice of a Social Service Worker as defined by the College's Code of Ethics and Standards of Practice.
10. If the Registrant were to testify at a contested hearing of this matter, it would be her evidence that she did not use the restricted title of Social Service Worker while employed at [Employer] and her employment at [Employer] commenced prior to her registration. As a result, the Registrant did not fully appreciate, at the time of the events outlined below, that her professional obligations as a registrant of the College would apply.
11. With the benefit of hindsight and reflection, the Registrant now understands that, as a registrant of the College, she had responsibilities and was required at all times to conduct herself in manner that upholds the high standards of the profession, including maintaining professional boundaries and avoiding conflicts of interests, for the protection of the public and repute of the profession.
12. If the Registrant were to testify at a contested hearing of this matter, it would be her evidence that her relationship with the Client at issue was consensual. However, as addressed in this ASF, the Registrant fully acknowledges that because her professional obligations and her position of authority, she should not have engaged in such a relationship, and it was professional misconduct for her to do so.

C. Events Underlying the Complaint

13. While employed at [Employer], the Registrant provided services and support to [Client A] ("**Client A**"), who was a client of [Employer] during the period from approximately March 2023 to April 2024. Client A had been referred to [Employer] by Ontario Works for assistance with job readiness and job searching.
14. In her role at [Employer], the Registrant was in direct contact with Client A to provide employment support and, if necessary, confirm his employment status, provide feedback on his job applications, and conduct interview preparation.
15. The Registrant acknowledges that Client A was a vulnerable individual and, among other barriers in relation to employment, the Client suffered from disabilities arising from mental health issues, including addiction.
16. The Registrant acknowledges that, during the period that Client A was receiving services at [Employer], she engaged in the following conduct:

- i. developing romantic and/or sexual feelings for Client A and taking no steps to enforce professional boundaries with Client A;
 - ii. communicating with Client A on her personal phone;
 - iii. exchanging inappropriate texts and emails with Client A;
 - iv. meeting with Client A for reasons unrelated to providing services on behalf of [Employer]; and
 - v. engaging in sexual activity with Client A, including intercourse.
17. The Registrant gave notice of resignation to [Employer] on May, 27, 2024, which was accepted.
18. [Employer] has a Conflict of Interest Policy (the “**Policy**”). The Policy is attached as **Exhibit “B”** [omitted from these Reasons]. The Policy expressly prohibited employees from having any kind of personal relationship with clients and/or engaging in any situation that would interfere or influence the employee’s professional judgment.
19. The Registrant admits that her conduct, as described in paragraph 16, was a breach of the Policy and also sexual abuse within the meaning of section 43(4) of the *Social Work and Social Service Work Act, 1998*, S.O. 1998, c. 31 (“**Act**”).
20. The Registrant admits the following were standards of practice of the profession as set out in the Code of Ethics (the “**Code of Ethics**”), and Schedule “B” to By-law No. 66, being the Ontario College of Social Workers and Social Service Workers Standards of Practice Handbook (the “**Handbook**”), during the time material to the allegations in **Exhibit “A”**:
 - i. Standard of Practice – Principle I: Relationship with Client.
 - ii. Standard of Practice – Principle II: Competency and Integrity.
 - iii. Standard of Practice – Principle VIII: Sexual Misconduct

Decision of the Panel

[9] The College bears the onus of proving the allegations against the Registrant on the balance of probabilities, using clear, cogent and convincing evidence. Having carefully considered that onus and standard of proof, the admissions of the Registrant, the evidence in the Agreed Statement of Facts, and the submissions of the parties, the Panel found that the Registrant committed the acts of professional misconduct alleged in the Notice of Hearing (except the parts of allegation (d) that were withdrawn).

[10] The Panel announced its decision orally on the record at the hearing.

Reasons for decision

[11] The College made six allegations of professional misconduct against the Registrant. Three of those allegations involved a failure to meet the standards of the social service work profession as set out in the Handbook, which constitutes professional misconduct under s. 2.2 of the Professional Misconduct Regulation. The College also alleged acts of misconduct under ss. 2.10, 2.28 and s. 2.36 of the Professional Misconduct Regulation.

[12] In allegation (a) the College sought to prove that the Registrant (i) failed to be aware of and reflecting upon her values, attitudes, assumptions and biases and how these impact her professional relationships with clients, and (ii) failed to distinguish her needs and interests from those of Client A to ensure that the client's needs and interests remained paramount. The College alleges that in so doing, the Registrant contravened the standards of the profession set out in Principle I of Handbook, commented on in Interpretations 1.7 and 1.8, and provided a professional service to Client A while in a conflict of interest, which is professional misconduct under s. 2.10 of the Professional Misconduct Regulation .

[13] In developing a personal and sexual relationship with the Client, the Registrant failed to distinguish her own needs from those of the client and prioritized her own needs and interests, which conflicted with those of her client. The social service worker-client relationship involves an inherent power imbalance and the client's interests require maintaining strict boundaries. By developing and acting on romantic and sexual feelings towards the client, the Registrant focussed inwards on herself rather than what the client needed. The Registrant did this knowing that Client A was a vulnerable individual and suffered from disabilities arising from mental health issues, including addiction.

[14] Furthermore, her employer's conflict of interest policy expressly prohibited the Registrant from having any kind of personal relationship with clients and/or engaging in any situation that would potentially interfere or influence her professional judgment. She failed to comply with the policy and allowed her professional judgment to be compromised.

[15] The College met its onus in respect of allegation (a).

[16] Under (b), the College alleges that the Registrant committed professional misconduct under s. 2.5 of the Professional Misconduct Regulation by abusing Client A sexually, verbally psychologically or emotionally, including sexually abusing the client within the meaning of s. 43(4) of the Act. This allegation has been proved.

[17] The facts establish that the Registrant sexually abused Client A within the meaning of s. 43(4) of the Act. While he was her client, she engaged in sexual touching and sexual relations with the client, including sexual intercourse.

[18] The Registrant's conduct and failure to state clearly to Client A that this behaviour was inappropriate also constitutes emotional abuse in the context of the social service worker-client relationship.

[19] Allegation (c) also entails professional misconduct under s. 2.5 of the Professional Misconduct Regulation, as well as failing to maintain specified standards of the profession relating

to sexual misconduct under Principle VIII of the Handbook and interpretations 8.1, 8.2, 8.3, 8.4, 8.5, 8.6, 8.7, and/or 8.10.

[20] We have already explained our finding of professional misconduct under s. 2.5 of the Professional Misconduct Regulation.

[21] With respect to Principle VIII and the Interpretations listed above, the Registrant bore exclusive responsibility for ensuring that sexual misconduct did not occur with her client. She failed to discharge that responsibility. She and the client exchanged inappropriate texts and emails and it escalated to sexual activity including sexual intercourse.

[22] Her employer had a policy directly applicable to the circumstances which required the Registrant to meet with her manager to report and consult about the potential conflict of interest. She was obligated to seek supervision immediately, allow her manager to assess whether a conflict of interest existed, cooperate in developing an appropriate plan, and make clear to the client that the behaviour was inappropriate. There is no evidence that she sought supervision or consultation. The Registrant did not terminate the relationship before it escalated from romantic and/or sexual feelings to a sexual relationship, including sexual intercourse.

[23] The College proved allegation (c).

[24] Allegation (d) relates to the standards of the profession in Principle II of the Handbook, which deal with competence and integrity, as well as professional misconduct under s. 2.10 of the Professional Misconduct Regulation: providing a professional service while in a conflict of interest. We have explained our reasons for finding professional misconduct under s. 2.10 above, and will not repeat them.

[25] The evidence satisfied the Panel that the Registrant failed to meet the standards of the profession in Principle II of the Handbook and interpretations 2.2, 2.2.1, 2.2.2, 2.2.4., 2.2.5 and 2.2.12. A power imbalance was inherent in the professional relationship between the Registrant and Client A. In her role as Work Readiness and Retention Specialist at [Employer], the Registrant provided support to marginalized individuals in overcoming barriers with respect to employment. The role involved developing a rapport and building trust with clients. The Registrant provided Client A with employment support, feedback on job applications and assistance with interview preparation. Client A was a vulnerable individual and suffered from disabilities arising from mental health issues, including addiction, amongst other barriers to employment. The Registrant failed to recognize that she was in a position of power and responsibility to the client and failed to ensure that her client was protected from the abuse of such power during and after the provision of professional services.

[26] She failed to establish and maintain clear and appropriate boundaries for the protection of the client. She ruptured the relationship of trust by practising in a conflict of interest and engaging in sexual relations with the client at a time when she was also providing him with social work services. The Registrant's conduct could reasonably be perceived as reflecting negatively on the profession of social service work.

[27] The College has met its onus of proving allegation (d).

[28] Allegation (e) is that the Registrant engaged in professional misconduct under s. 2.28 of the Professional Misconduct Regulation by contravening the Act, the regulations under the Act, and/or the College's bylaws. We have found on each of the other allegations that the Registrant contravened the Professional Misconduct Regulation and the Handbook, which is a bylaw of the College. By virtue of those findings, allegation (d) has been proven as well.

[29] The College alleges in (f) that the Registrant committed professional misconduct under s. 2.36 of the Regulation by engaging in conduct or performing an act relevant to the practice of the profession that, having regard to all circumstances, would reasonably be regarded by members as disgraceful, dishonourable or unprofessional.

[30] The Panel found that the Registrant's conduct would reasonably be regarded by members as not only unprofessional, but also dishonourable and disgraceful.

[31] The client was vulnerable and was seeking services from [Employer] to try to get his life on track. The Registrant was in a position of power as a result of her role as social service worker, which gave her access to information about the client's life and the barriers he was facing.

[32] The Registrant's conduct fell well below the standards expected of social service workers and involved an element of moral failing. [Employer]'s conflict of interest policy, the College's Handbook and the Act and Professional Misconduct Regulation are all clear as to the absolute prohibition on sexual misconduct and sexual abuse of a client. The Registrant knew or ought to have known that her conduct was wrong, yet she proceeded anyway.

[33] The Registrant admitted that she engaged in conduct that could reasonably be perceived as reflecting negatively on the profession of social service work. She further acknowledged that because of her professional obligations and her position of authority, she should not have engaged in such a relationship and doing so was professional misconduct. The Panel agrees.

Penalty submissions

[34] The parties were in agreement on the issue of penalty. They presented to the Panel a Joint Submission on Penalty and Costs ("**Joint Submission**") asking this Panel make an order as follows.

1. The Registrant will be reprimanded, orally, by the Discipline Committee via an electronic hearing, and the fact and nature of the reprimand shall be recorded on the College's public register for an unlimited period of time.
2. The finding and penalty of the Discipline Committee shall be published, with the Registrant's name, online and/or in print, including, but not limited to, in the official publications of the College, on the College's public register, and posted to CanLII.
3. The Registrant shall pay costs to the College in the amount of five thousand dollars (\$5,000.00), which amount shall be paid to the College on the date of the hearing of this matter.

[35] Appended as a scheduled to the Joint Submission was an Undertaking and Acknowledgement signed by the Registrant (the “**Undertaking**”). The Undertaking includes, among other terms, the following:

... I, STEPHANIE BRASH, undertake that:

1. I resign from the College and permanently surrender my certificate of registration.
2. I will refrain from engaging in the practice of social work or social service work, as defined in the College’s Code of Ethics and Standards of Practice and/or use the restricted titles set out in sections 46 and/or 47 of the Social Work and Social Service Work Act, 1998, S.O. 1998, c. 31 (the “Act”), and/or hold myself out to the public as a member of the College and/or as qualified to practise as a social worker or social service worker.
3. I will permanently refrain from re-applying to the College to be registered and/or in any way seek the reinstatement of my certificate of registration.
4. I will not engage in the practice of social work or social service work in any jurisdiction.
5. I acknowledge that the Registrar will record on the public register the fact of my Undertaking and Acknowledgement to permanently resign from the College and to refrain from re-applying to the College and/or to seek reinstatement of my certificate, and/or engage in the practice and/or use any of the restricted titles set out in section 46 or 47 of the Act.

[36] Both parties urged the Panel to accept the Joint Submission having regard for the Registrant’s Undertaking. College counsel emphasized that the Joint Submission meets the purposes and goals of penalty, namely public protection, maintaining public confidence in the proper regulation of those who practise the social service work profession, and specific and general deterrence. The proposed penalty also reflects the aggravating and mitigating circumstances of the case and the principle of proportionality.

[37] The Registrant has resigned from the College and permanently surrendered her certificate of registration. She has undertaken not to seek registration in the future and not to engage in the practice of social work or social service work in any jurisdiction. College counsel submitted that alongside that Undertaking, the reprimand and publication of the College’s finding and order sought in the Joint Submission provide adequate deterrence and promote public confidence.

[38] College counsel emphasized that the Registrant was a new member of the College at the time of the misconduct with no prior discipline history. She cooperated with the College in the discipline process, including admitting to the allegations of professional misconduct, and entering into an agreed statement of facts and joint submission on penalty with the College. These are strong mitigating factors. The College also identified prior cases from this Discipline Committee where similar orders were made for a reprimand and publication, after the registrant admitted their misconduct and permanently resigned from the College.

[39] The Registrant's counsel agreed that the Joint Submission addresses the public interest. She emphasized the stringent test for rejecting a joint submission and that the proposed penalty crafted by the parties in this case reflects the principles of deterrence, as well as the mitigating factor of the Registrant taking responsibility and waiving her right to a contested hearing.

Penalty decision

[40] Having considered the findings of professional misconduct, the evidence, the submissions of the parties and the Registrant's Undertaking, the Panel accepted the Joint Submission and made an order in accordance with the terms set out in paragraph 34, above.

[41] The Panel's order was announced orally on the record at the hearing.

Reasons for penalty decision

[42] The Panel recognized that a discipline penalty should maintain high professional standards, preserve public confidence in the College's ability to regulate its registrants, and, above all, protect the public. These goals are achieved through a penalty that considers the principles of general deterrence, specific deterrence and, where appropriate, rehabilitation and remediation of the Registrant's practice. The Panel understood that we should accept the Joint Submission unless we find that it would bring the administration of justice into disrepute or would otherwise be contrary to the public interest.

[43] Having regard to the Registrant's Undertaking, the Panel agreed with the parties that the Joint Submission serves the purposes of a penalty order and achieves the objective of general and specific deterrence. Because the Registrant has permanently resigned from the College and undertaken not to practise social work or social service work in the future, the public is protected without the need for any further order from this Panel restricting her ability to practice. The Reprimand allows the Panel to convey directly to the Registrant our disapproval of her conduct and because the reprimand is public, it serves as a general deterrence. Publication of our finding and order also achieve general deterrence by making clear to other members of the profession the significant consequences they too will face if they engage in similar misconduct.

[44] The penalty reflects the mitigating and aggravating factors of this case. An aggravating factor is that [Employer] had a conflict of interest policy that gave the Registrant clear guidance as to what to do when the situation developed that could influence her professional judgment. She disregarded her employer's policy, along with the College's standards.

[45] On the other hand, by admitting to the misconduct and entering into the Agreed Statement of Facts and Joint Submission, the Registrant has taken responsibility for her actions. She waived her right to have the College prove the case against her, saving the College the cost of a contested hearing and sparing witnesses the need to testify. These are important mitigating considerations.

[46] By permanently resigning from the College, the Registrant has accepted a more significant professional consequence than this Panel could have imposed, since the Act affords a registrant whose certificate of registration is revoked by an order of the Discipline Committee the opportunity to reapply for registration in the future. The Registrant will not have that opportunity as a result of her Undertaking.

[47] The Panel was also satisfied that the jointly proposed penalty falls within a range of reasonable penalties for similar misconduct after consulting the decisions in *Ontario College of Social Workers and Social Service Workers v DeJonge*, 2024 ONCSWSSW 9 and *Ontario College of Social Workers and Social Service Workers v Freedman*, 2024 ONCSWSSW 5.

[48] On the issue of costs, the parties jointly proposed that an order for costs in the amount of \$5,000.00 is appropriate. The Panel agreed. The amount is in line with costs orders imposed by the Discipline Committee in respect of other uncontested matters and the Registrant has agreed in the Joint Submission to pay the costs on the same day as the hearing, providing for prompt payment to the College.

[49] At the end of the hearing, after confirming that the Registrant waived her right of appeal, the Panel delivered an oral reprimand to the Registrant in accordance with paragraph 1 of the Panel's order.

I, Sue Oliver, sign this decision as chairperson of the Panel and on behalf of the Panel members listed below.

Date: February 17, 2026

Signed: _____

Sue Oliver
Charlene Crews
Carina Chan