



On June 14, 2024 allegations of the Registrant's professional misconduct were referred to the Discipline Committee for hearing, on a date yet to be fixed. Please see the Notice of Hearing below:

**ONTARIO COLLEGE OF SOCIAL WORKERS
AND SOCIAL SERVICE WORKERS**

IN THE MATTER OF Sections 26 and 28 of the *Social Work and Social Service Work Act, 1998, S.O. 1998, Chapter 31;*

AND IN THE MATTER OF a hearing directed to be held by the Discipline Committee of the Ontario College of Social Workers and Social Service Workers under the *Social Work and Social Service Work Act, 1998;*

AND IN THE MATTER OF allegations respecting the professional conduct of Damilare Michael Kujore, a Social Service Worker and registrant with the said College;

NOTICE OF HEARING

TAKE NOTICE that a hearing will take place on a date to be fixed by the Registrar at the hour of 9:30 o'clock in the forenoon (or as soon after that time as a panel can be convened for the purpose of conducting the hearing) electronically, in writing or in person at the Board Room of the Ontario College of Social Workers and Social Service Workers, 250 Bloor Street East, Suite 1000, Toronto, Ontario before the Discipline Committee of the Ontario College of Social Workers and Social Service Workers (to be confirmed). The hearing will be held pursuant to the provisions of sections 26 and 28 of the *Social Work and Social Service Work Act, 1998* (the "Act") and pursuant to the Regulations made thereunder, for the purpose of hearing and determining allegations of professional misconduct against you, Damilare Michael Kujore, which allegations were referred to the Discipline Committee pursuant to section 25(1) of the Act.

AND TAKE NOTICE that you are alleged to be guilty of professional misconduct within the meaning of section 26(2) of the Act in that you are 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**")¹.

I. The following are particulars of the allegations:

Client A

1. At all times material to these allegations, you were a registered social service worker with the Ontario College of Social Workers and Social Service Workers ("College") and practicing at [place of employment] as a Youth Addiction Outreach Counsellor. In this role, you were responsible for providing counselling to people 25 years of age or younger.
2. In or about March and April 2022, you were engaged to provide social service work services to ("Client A"). Client A was a young and vulnerable client who sought assistance from [place of employment] to deal with addiction issues and/or other mental health concerns.
3. During the period from approximately March to April 2022, you provided social service work services to Client A, including counselling.
4. You purported to discharge Client A on or about April 20, 2022. You continued to provide social service work services to Client A, including counselling services, thereafter.

¹ By-law 24, as amended by By-law Nos. 32 and 48 and revoked effective July 1, 2008 by By-law 66, continues to apply to conduct which occurred prior to July 1, 2008.

5. In providing services to Client A, you failed to appropriately document and/or keep records of your sessions with Client A, including misrepresenting in your records the nature and/or purpose of your meetings and/or discussions with the Client, and failing to maintain records of your correspondence, including texts, with Client A.
6. During the professional relationship with Client A and/or following termination of the professional relationship with Client A, you engaged in numerous boundary violations, including:
 - a. forming a personal relationship with Client A;
 - b. picking Client A up in your car and/or picking Client A and her friend up in your car;
 - c. meeting with and/or communicating with Client A outside of counselling sessions, including at a bar;
 - d. connecting with Client A on social media, including on Snapchat and/or other messaging applications;
 - e. communicating with Client A via text or other electronic means;
 - f. purchasing alcohol for Client A and/or providing alcohol to Client A;
 - g. providing and/or offering to provide Client A with marijuana;
 - h. asking Client A to take off her clothes and/or jump in the water; and/or
 - i. exchanging and/or requesting and/or receiving a sexually explicit photo of Client A;
7. During the professional relationship with Client A and/or after terminating the professional relationship with Client A, you engaged in sexual behaviour with Client A, including:

- a. touching, of a sexual nature, with Client A, including but not limited to kissing or attempting to kiss Client A and climbing or attempting to climb on top of Client A without consent;
 - b. engaging in behaviour and/or making remarks of a sexual nature to Client A that were not clinically appropriate to the service provided, including but not limited to, attempting to engage in touching of a sexual nature and/or attempting to remove Client A's clothing without Client A's consent.
8. The College Investigator requested copies of text messages from you that you exchanged with Client A. The College Investigator also obtained copies of text messages from Client A's phone.
9. The copies of text messages that you provided had certain text message(s) missing and/or deleted and/or altered.

Client B

10. In or about July and August 2022, you were engaged to provide social work services to ("Client B"). Client B was a young and vulnerable client who sought assistance from [place of employment] to deal with addiction issues and/or other mental health concerns. Client B was under 18 years of age.
11. During the period from approximately July to August 2022, you provided social work services to Client B, including counselling.
12. In providing services to Client B, you failed to appropriately document and/or keep records of your sessions with Client B, including misrepresenting in your records the nature and/or purpose of your meetings and/or discussions with the Client, and failing to maintain records of your correspondence, including texts, with Client B.
13. In addition, during your sessions with Client B, you failed to provide appropriate counselling. In particular, you asked questions that were not clinically appropriate and/or manipulated the counselling sessions with Client B in order to have Client B discuss topics of a sexual nature, including asking Client B about sexual experiences and/or preferences.

14. During the professional relationship with Client B you picked up Client B in your car and took Client B to a secluded area, and/or asked Client B to delete messages you sent to Client B, causing Client B to feel uncomfortable and/or scared and/or intimidated and/or harassed and/or to fear for her safety.
15. You touched Client B's leg on multiple occasions, including her thigh, and moved your hand towards her groin area. You continued to do so despite being asked to stop and/or being told she was uncomfortable.
16. You pressured Client B and/or caused Client B to feel pressure to smoke marijuana and/or drink alcohol.
17. During the professional relationship with Client B and/or following termination of the professional relationship with Client B, you engaged in numerous boundary violations, including:
 - a. forming or attempting to form a personal relationship with Client B and/or asking Client B to hangout outside of counselling;
 - b. asking Client B about her sexual experiences and/or preferences;
 - c. picking Client B up in your car;
 - d. meeting with and/or communicating with Client B outside of counselling sessions;
 - e. connecting with Client B on social media, including on Snapchat and/or TextNow and/or other messaging applications;
 - f. communicating with Client B via text or other electronic means;
 - g. purchasing alcohol for Client B and/or providing alcohol to Client B;
 - h. purchasing food for Client B;

- i. providing Client B with marijuana and/or offering Client B marijuana and/or asking Client B if she wanted to hang out and smoke marijuana together;
 - j. telling Client B that you wanted to see her drunk and/or "cross-faded";
 - k. commenting on Client B's clothing and asking Client B to take off her clothing and/or some of her clothing;
 - l. urinating outside, in the presence of Client B and/or in proximity to Client B, such that Client B could see you and/or your reflection and/or your penis and/or the reflection of your penis; and/or
 - m. asking Client B to communicate with you on via a second telephone number that was not associated with [place of employment].
18. During the professional relationship with Client B and/or immediately upon terminating the professional relationship with Client B, you engaged in sexual behaviour with the Client, including:
- a. touching, of a sexual nature, with Client B;
 - b. engaging in behaviour and/or making remarks of a sexual nature to Client B that were not clinically appropriate to the service provided, including but not limited to, discussing sexual preferences and/or experiences and attempting to engage in touching of a sexual nature.

II. It is alleged that by reason of engaging in some or all of the conduct outlined above, you are guilty of professional misconduct as set out in section 26(2)(a) and (c) of the Act:

- a) In that you violated sections 2.2, 2.9, 2.10, and 2.28 of the Ontario Regulation 384/00 (the "Professional Misconduct Regulation") and Principle I (commented on in Interpretations 1.5, 1.6 and 1.7) of the Ontario College of Social Workers and Social Service Workers Standards of Practice Handbook (the "Handbook" or the

"Standards") by failing to be aware of your own values, attitudes and needs and how these impact on professional relationship with clients; by failing to distinguish your needs and interests from those of your clients to ensure that, within professional relationships, clients' needs and interests remained paramount; when employed by organizations, by failing to maintain an awareness and consideration of the purpose, mandate and function of those organizations and how these impact on and limit professional relationships with clients;

- b) In that you violated sections 2.2, 2.5, 2.6, 2.9 and 2.10 of the Professional Misconduct Regulation and Principle II of the Handbook (commented on in Interpretation 2.2, 2.2.1, 2.2.2, 2.2.3 and 2.2.8) by failing to take care to protect clients from the abuse of power during and after the provision of professional services and by failing to maintain clear and appropriate boundaries in professional relationships for the protection of clients; by engaging in professional relationships that constitute a conflict of interest or in situations in which you ought reasonably to have known that the client would be at risk in any way; by using your professional position of authority to coerce, improperly influence, harass, abuse or exploit clients; by failing to avoid conduct which could reasonably be perceived as reflecting negatively on the profession of social work;
- c) In that you violated of sections 2.2 and 2.6 of the Professional Misconduct Regulation and Principle III of the Handbook (commented on in Interpretation 3.2 and 3.7) by failing to deliver client services and respond to client queries, concerns, and/or complaints in a timely and reasonable manner; by failing to assume full responsibility for demonstrating that clients were not exploited, coerced or manipulated, intentionally or unintentionally, in a situation where a personal relationship occurred between you and client(s) and/or former client(s);
- d) In that you violated Sections 2.2, 2.19, 2.20, 2.21 and 2.33 of the Professional Misconduct Regulation and Principle IV (commented on in Interpretations 4.1.1 (footnote 1-3) and 4.1.2) by recording information that fails to conform with accepted service or intervention standards and protocols with the profession of social work and social service work, relevant to the services provided, and in a format that fails to facilitate the monitoring and evaluation of the effects of the service/intervention; by failing to ensure that

records are current, accurate, contain relevant information about the client; by falsifying a record relating to your practice; by failing to keep records as required by the regulations and standards; by making a statement in the record your knew and/or ought to have known was false, misleading, inaccurate or otherwise improper; and by failing to cooperate in a College investigation;

- e) 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, 8.2.2, 8.2.3, 8.4, 8.6, and 8.7) by failing to ensure that sexual misconduct did not occur; by engaging in touching, of a sexual nature, of the client; by engaging in behavior or remarks of a sexual nature towards the client, other than behaviour or remarks of a clinical nature appropriate to the service provided; by failing to state clearly to the client that behaviour of a sexual nature is inappropriate by virtue of the professional relationship; and by engaging in sexual relations with the client during the period in which you provided counselling services to the client; by engaging in sexual relations with the Client after having provided counselling services to that client; and/or
- 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

AND TAKE NOTICE that the Discipline Committee may make an order under Section 26(4), (5), (6), (7), (8) and (9) of the Act, or any of them, in respect of any or all of the above allegations.

AND FURTHER TAKE NOTICE that the parties (including the College and you) shall be given the opportunity to examine before the hearing any documents that will be given in evidence at the hearing.

AND FURTHER TAKE NOTICE that if the hearing is proposed to take place in writing, either of the parties (including the College and you) may, in accordance with the procedures set out in the *Statutory Powers Procedure Act*, RSO 1990, c S.22 (the “SPPA”) and the Discipline Committee’s Rules of Procedure, seek to require that the hearing be held electronically or orally by

satisfying the Discipline Committee that there is good reason for not holding a written hearing.

AND FURTHER TAKE NOTICE that if the hearing is proposed to take place electronically, either of the parties (including the College and you) may, in accordance with the procedures set out in the SPPA and the Discipline Committee's Rules of Procedure, seek to require that the hearing be held orally by satisfying the Discipline Committee that holding an electronic hearing is likely to cause the party significant prejudice.

AND FURTHER TAKE NOTICE that at the said hearing, you are entitled to be present and to be represented by counsel.

IF YOU DO NOT ATTEND AT THE HEARING IN ACCORDANCE WITH THIS NOTICE OF HEARING, THE DISCIPLINE COMMITTEE MAY PROCEED WITH THE HEARING, AND MAY DEAL WITH THE ABOVE ALLEGATIONS AGAINST YOU, IN YOUR ABSENCE AND WITHOUT ANY FURTHER NOTICE TO YOU.

Dated at Toronto, the 17th day of June, 2024.

By: _____
Registrar and CEO
Ontario College of Social Workers and Social Service Workers