

**IN THE MATTER OF A HEARING BEFORE THE HEARING TRIBUNAL
OF THE COLLEGE OF PHYSIOTHERAPISTS OF ALBERTA**

into the conduct of SURYA GADGERAO
pursuant to the
Health Professions Act, RSA 2000 c H-7

**NOTICE OF HEARING
AND
NOTICE TO ATTEND AS WITNESS**

TO: SURYA GADGERAO

TAKE NOTICE THAT on **April 28, 29, 30, May 1, and May 2, 2025** in the City of Edmonton, in the Province of Alberta, commencing at 9:00 a.m. by Zoom Video Conference, a Hearing Tribunal of the College of Physiotherapists of Alberta (the “College”) will conduct a hearing into allegations that you engaged in unprofessional conduct in that:

1. On or about May 15, 2023, while providing physiotherapy treatment to patient C.R., you touched her buttocks under her clothing without a therapeutic purpose.
2. On or about May 26, 2023, while providing physiotherapy treatment to patient C.R., you touched her labia over her clothing without a therapeutic purpose.
3. Further, or in the alternative to Allegation 1, on or about May 15, 2023, while providing physiotherapy treatment to patient C.R., you did one or more of the following:
 - a. Failed to obtain adequate informed consent before touching patient C.R.’s buttocks under her clothing;
 - b. Failed to perform physiotherapy services on patient C.R.’s buttocks in a clinically appropriate and/or competent manner.
4. Further, or in the alternative to Allegation 2, on or about May 26, 2023, while providing physiotherapy treatment to patient C.R., you did one or more of the following:
 - a. Failed to obtain adequate informed consent before touching patient C.R.’s inner thigh and/or groin area over her clothing;
 - b. Failed to perform physiotherapy services on patient C.R.’s inner thigh and/or groin area in a clinically appropriate and/or competent manner.

IT IS FURTHER ALLEGED THAT your conduct constitutes “unprofessional conduct” as defined in s. 1(1)(pp)(i), (ii), and (xii) of the *Health Professions Act*, RSA 2000 c H-7 (the “HPA”), in particular:

1. Your conduct in Allegation 1 and/or Allegation 2 constitutes “sexual abuse” as defined in s. 1(1)(nn.1) of the HPA and contravenes the College’s Standard of Practice for Physiotherapists in Alberta: Sexual Abuse and Sexual Misconduct.
2. Further or in the alternative, your conduct breaches one or more of the following:
 - a. Code of Ethical Conduct for Alberta Physiotherapists: Responsibilities to the Client (A1, A4, A5, A6, A12, and A18); Responsibilities to the Public (B1); and Responsibilities to Self and the Profession (C1); and
 - b. Standards of Practices for Physiotherapists in Alberta: Client Assessment, Diagnosis, Interventions; Client-Centered Care; Consent; Evidence-Informed Practice and Professional Boundaries.

AND FURTHER TAKE NOTICE that pursuant to section 72(1) of the HPA you are required to attend at the said time and place in person, and you are compelled to give evidence and produce models, charts, documents, papers, notes, records, and other material relevant to the Hearing Tribunal.

AND FURTHER TAKE NOTICE that in the event that you do not attend at the said time and place, the Hearing Tribunal may proceed in your absence pursuant to section 79(6) of the HPA and you will not be entitled to any further notice of the proceedings.

AND FURTHER TAKE NOTICE that in the event you do not attend at the said time and place, your failure to comply with the Notice to Attend may result in a further complaint and may constitute unprofessional conduct.

DATED at the City of Edmonton, in the Province of Alberta, this 26 day of November 2024.



Haylee O'Reilly
Hearings Director
Signed by: Haylee O'Reilly