

**IN THE MATTER OF A HEARING BEFORE THE HEARING TRIBUNAL  
OF PHYSIOTHERAPY ALBERTA - COLLEGE + ASSOCIATION**

into the conduct of Harkawaljit Singh Randhawa  
pursuant to the  
*Health Professions Act, R.S.A.2000, c. P-14*

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

**TO: HARKAWALJIT SINGH RANDHAWA**

**TAKE NOTICE THAT** on **September 12, 13, 14, and 15, 2023** in the City of Edmonton, in the Province of Alberta, commencing at 9:00 a.m. each day, location to be determined, a Hearing Tribunal of Physiotherapy Alberta–College + Association\* (the “College”) will conduct an in-person hearing into allegations that you engaged in unprofessional conduct in that:

1. On or about April 2, 2022, while providing physiotherapy treatment to A.K., you did one or more of the following to patient A.K.:
  - (a) Touched her left breast without her consent or a therapeutic purpose;
  - (b) Massaged around and on her right breast without her consent or a therapeutic purpose;
  - (c) Told her she was beautiful, or words to that effect; and
  - (d) Attempted to kiss her.

**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, R.S.A. 2000, c. H-7* (the “HPA”), in particular:

1. Your conduct 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.

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\* Physiotherapy Alberta – College + Association operates as College of Physiotherapists of Alberta

2. Further or in the alternative, your conduct constitutes “sexual misconduct” as defined in s. 1(1)(nn.2) of the HPA and contravenes the College’s Standard of Practice for Physiotherapists in Alberta: Sexual Abuse and Sexual Misconduct.
  
3. 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, 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-Centered Care; Consent; 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 9<sup>th</sup> day of March, 2023.

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Jane McKenzie  
Hearings Director  
Signed by: Jane McKenzie