

May 22, 2025

Katie Schulz, Board Chair

Craig Roxborough, Registrar & CEO

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Submitted via email to: [consultation@collegept.org](mailto:consultation@collegept.org)

**Subject: Consultation on proposed Standards, round 5**

Dear Ms. Schulz and Dr. Roxborough,

Thank you for the opportunity to participate in the consultations on the two proposed standards; we offer the following feedback for your consideration.

### **Standards: Boundary Violations and Sexual Abuse**

These Standards are generally well organized, though they are missing some key information that is present in the current Boundaries and Sexual Abuse Standard.

One element that is not captured by the proposed Standard but is present in the current Standards is the explicit definition of relatives and spouses. Including this list in the Standard will help prevent misconceptions about who may be subject to boundary violations and abuse. It is also unclear if physiotherapists can provide treatment to past romantic partners.

Additionally, more clarity around what constitutes discrimination, sexual behaviour and remarks is necessary. Without explicit definitions or examples, there are individuals who may not view their comments or behaviour as discriminatory or sexual in nature. This is an opportunity for the College to ensure that physiotherapists are conscious of the impact of their words and behaviour. Explicit definitions and examples of, or a background document on, discrimination and discriminatory practices would be helpful to enable physiotherapists to self-reflect and adjust their practices accordingly, and to establish a common definition.

Regarding ending therapeutic relationships, the proposed Standard states that a physiotherapist “must not end a therapeutic relationship for the purpose of pursuing a personal relationship;” however, it is important to also include that a physiotherapist should not continue to provide care if they desire a romantic relationship, as a physiotherapist cannot maintain an objective and unbiased approach to care in this circumstance. We propose that the Standard includes a



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statement that the physiotherapist, if attracted to or romantically interested in a patient, must end the therapeutic relationship in a respectful manner with a transfer of care plan in place.

Lastly, the current version of this Standard includes statements around gifts, business partnerships, and leisure activities. We recognize that this has been included in the newly updated Conflict of Interest Standard, but it would be helpful to keep in this Standard as well. Given that there is some overlap in the conflict of interest and boundary standards, we recommend that the College refers to this Standard to ensure that physiotherapists can locate necessary information that may not be included here.

In closing, we appreciate the opportunity to provide feedback on this consultation. We would be pleased to meet with you to discuss the points we have made in this submission.

Sincerely,

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