

Professional Conduct Report

Dr. Bradley Jack Stewart sanctioned for inappropriate behaviour with patient

Edmonton neurologist Dr. Bradley Jack Stewart was found guilty of unprofessional conduct by a CPSA Hearing Tribunal, for failing to maintain a professional relationship with a patient.

Background

Dr. Stewart was accused of violating appropriate boundaries between 2011 and 2013, which included sending a patient improper text messages and emails, and providing personal gifts. After initially receiving the complaint in 2016, CPSA placed conditions on Dr. Stewart's practice permit requiring a chaperone for all clinical encounters with female patients (these conditions remain in place). The patient also contacted law enforcement and CPSA's investigation was put on hold pending the outcome of the criminal proceedings—sexual assault charges against Dr. Stewart were dismissed in late 2021.

The Hearing Tribunal found Dr. Stewart's conduct violated CPSA's standards on sexual boundaries and that he was guilty of unprofessional conduct. While there was a joint submission for a six-month suspension of his practice permit, the Tribunal heard arguments from both parties on whether Dr. Stewart should be allowed to serve his suspension in two-week segments, separated by two-week segments in which he could practise. The Tribunal determined that the suspension should be served over six consecutive months and also ordered that:

- The conditions currently in effect on Dr. Stewart's practice permit will remain in place when he resumes practising.
- Dr. Stewart is responsible for 75 per cent of the costs of the investigation and hearing.

As Dr. Stewart's conduct occurred prior to the implementation of *An Act to Protect Patients*, mandatory sanctions under that legislation do not apply. The Hearing Tribunal's decision can be [reviewed in full on CPSA's website](#).

Dr. Stewart was sanctioned by a different CPSA Hearing Tribunal in 2021, for failing to abide by the conditions on his practice permit that were a result of this complaint.

Learnings

Maintaining professional boundaries within the physician-patient relationship is an important and essential part of medical practice, due to the inherent power imbalance between healthcare practitioners and their patients. Violating those

boundaries and engaging in a personal or sexual relationship with a patient is a clear breach of CPSA's standards. We encourage all regulated members to review our standards on [personal](#) and [sexual](#) boundary violations, to ensure a full understanding of their expectations.

When a complaint is investigated and sanctions are determined, a physician's conduct is assessed against the standards in place at the time of the incident. While a personal or sexual relationship with a patient has always been a clear boundary violation and a breach of CPSA's [standards](#), if the conduct occurred prior to April 1, 2019 and the implementation of *An Act to Protect Patients* (which it did in this case), it will be assessed against previous legislation, which did not include mandatory sanctions for boundary violations.