



On August 3, 2022 allegations of the Member'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 Sanu Augustine, a Social Worker and member of 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) 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. 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, Sanu Augustine, 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 said allegations:

1. Now and at all times relevant to the allegations, you were a registered social worker with the Ontario College of Social Workers and Social Service Workers (the "College") and were also a registered natural medicine practitioner. At all relevant times, you provided both Ayurvedic services and social work services to clients through Natural Healing Services in London, Ontario.
2. Between in or about May and August 2018, you provided Ayurvedic services to Client "A" and her two adult daughters, "B" and "C". The Ayurvedic services you provided included massage treatments, among other things.

Conduct with respect to "A"

3. During one or more of "A's" treatments, you asked if she wanted to remove her bra and underwear, to which she said no. You continued encouraging her to remove her undergarments, despite the fact that "A" had indicated she was not comfortable doing so and your intake forms indicated that female clients could choose to keep their bra and underwear on during treatment.
4. During one or more of "A's" treatments, you attempted to touch her in the genital area, despite "A's" words and/or conduct making it clear that she was not comfortable with your conduct.
5. "A" covered her genital area with her hand and pushed your hand away to prevent you from touching her genital area.
6. At one or more of "A's" appointments, you convinced her to remove her bra. You then proceeded to massage "A's" breasts. That contact was not necessary or appropriate to the services being provided and/or you did not take appropriate steps to ensure "A" consented to that contact. Your conduct caused "A" to feel uncomfortable.

Conduct with respect to "C"

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.

7. Client “C” had approximately three appointments with you. When filling out her initial intake forms, “C” indicated that she did not want her breasts, pelvic area, or buttocks to be touched.
8. During “C’s” final appointment, you grazed her groin multiple times during the massage. You then moved aside the bathing suit bottom she was wearing, put your hand directly on her groin and/or vaginal area, and proceeded to massage her groin/vaginal area.
9. That contact was not necessary or appropriate to the services being provided and/or you did not take appropriate steps to ensure “C” consented to that contact. Your conduct caused “C” to feel uncomfortable and/or violated.

Conduct with respect to “B”

10. Client “B” had approximately three appointments with you. When filling out her initial intake forms, “B” indicated that she did not want her breasts, pelvic area, or buttocks to be touched.
11. At one or more of “B’s” appointments, despite her indication that she did not want her pelvic area or buttocks to be touched, you asked that she move down and/or remove the bathing suit bottom she was wearing.
12. Despite “B’s” indication that she did not want her breasts, pelvic area, or buttocks touched, you asked if you could touch her in these areas. “B” felt uncomfortable but said you could do so, and you then proceeded to massage her breasts and buttocks.
13. That contact was not necessary or appropriate to the services being provided and/or you did not take appropriate steps to ensure “B” consented to that contact.
14. During “B’s” final appointment, you inserted one finger in her vagina and/or massaged her clitoris. You then asked “B” if she had orgasmed.
15. You did not ask “B’s” permission to touch her in this manner. Your conduct was unwelcome and inappropriate and/or it was not necessary or appropriate to the services being provided. Your conduct caused “B” to feel uncomfortable and/or violated.
16. “B” had to seek out therapy to deal with the trauma she experienced as a result of your conduct.

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 **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 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 4th day of August 2022.

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