



Management, Retention, & Disposal of Complainant Information Policy

The complainant record refers to any information or record received and/or created in the course of submitting a complaint with the Personal Support Worker (“PSW”) Registry of Ontario (“Registry”).

All records (paper, electronic, or otherwise) created, captured, and managed by the Registry must be maintained in accordance with the applicable legal statutes, professional regulations, generally accepted practice, and this policy.

Definitions

“**Electronic Database**” refers to the secured electronic system in which all records are stored.

“**Registry**” refers to the Personal Support Worker (PSW) Registry of Ontario.

“**Information/record**” refers to all documents submitted to the Registry about an individual including, but not limited to:

- Complaint form
- All consents provided to the Registry
- Requests for supplemental or additional information
- Correspondences between the Registry and the complainant
- Complaint information about a registrant
- All communication between the Registry and the complainant

Creation of Record

Records created and stored with the Registry are guided by the following quality criteria:

- **Completeness:** Information contained in the records created by the Registry should be complete.
- **Identity:** The electronic data should be recognizable and identifiable to the individual whom it belongs to; however, the electronic systems of the Registry should ensure that minimal record identification (i.e. metadata) is captured for all records.
- **Accessibility:** Records are created and maintained such that they are searchable and easily retrievable through the established retention period.



- **Authenticity:** For electronic records, mechanisms are in place to ensure that the proofs of authenticity (electronic signatures) are reliable, and meet the legal and regulatory record keeping requirements.
- **Confidentiality:** Utmost diligence is exercised in creating and maintaining the records that contain personal and confidential information. Records containing personal or confidential information are created and maintained in accordance with the relevant Acts, Regulations, and policies of the Registry. The Registry reserves the right to disclose certain findings or complaints to Registered Employers and Registrant PSWs.

Additionally, all records created by the Registry must meet the operational, informational and evidentiary needs to fulfill its created purpose.

Retention and Storage of Records

Electronic Records

Electronic records are stored on the Registry's database. The database in which records are stored is located on an internal server behind an internal firewall. It requires credentials with two-factor authentication to access it. Access to the database is limited to staff who maintain the server, the application development team, and PSW Registry staff. All individuals who have access will have their access to the database tracked via an audit system to ensure that they are in compliance with the Registry's policies and procedures.

Paper Records

Where the Registry is in possession of paper records, the records will be kept in a locked filing cabinet inside a secured room. Only designated Registry administrators will have access to these records. The paper records will be shredded as soon as the records have been successfully uploaded to the database.

Duplication of Records

Records will only be duplicated as needed to ensure that the electronic record of the registrant is accurate and complete. All duplicates will be deleted as soon as possible, with the exception of backup copies of the database. The database is backed up at least once a day and has the same security system as the database itself.



Disposal of Records

Complaints in Respect to Registered PSWs

Personal information and personal health information about complainants is retained for **ten (10) years** from the date on which the complaint is received by the Registry.

Complaints in Respect to Non-Registered PSWs

Records of complainants who submit complaints about non-registered PSWs will have their personal information and personal health information retained by the Registry for a period of **two (2) years** from the date of submission to the Registry. After this period, all electronic records will be deleted from the database. Paper records will be securely shredded as soon as the information has been uploaded to the electronic database.

Complainants who Withdraw Consent to Share Personal Information or Personal Health Information

A complainant who withdraws their consent to have their personal information or personal health information shared with third-parties may do so at any time prior to the resolution of the complaint. Consent can only be withdrawn through written notice to the Registry at inquiries@psw-on.ca or by mail at the following address:

Personal Support Worker Registry of Ontario
222 St. Patrick St.
Toronto, ON
M5T 1V4

A complainant who withdraws consent will, within **five (5) business days**, receive acknowledgement that their personal information or personal health information shall no longer be shared. The Registry will retain their information for **two (2) years** from the date on which the complaint is received by the Registry. Electronic records will be deleted from the database when the record is eligible to be disposed. Paper records will be securely shredded as soon as the information has been uploaded to the Registry database.



Requesting Correction of Personal Information or Personal Health Information

Complainants who wish to correct or change their personal information or personal health information may do so by filling out the Request for Information form, available on our website (www.psw-on.ca). The form can be returned by email to inquiries@psw-on.ca, or sent by mail to:

222 St. Patrick St
Toronto, ON
M5T 1V4
ATTN: Personal Support Worker Registry of Ontario

Once the request has been received, your personal information or personal health information will be corrected as quickly as possible by the Registry team.

If the Electronic Database is Breached or Compromised

Where the electronic database has been compromised or breached, the Registry will take all reasonable and necessary steps to ensure that all affected individuals (including both the complainants and the PSW about whom the complaint was made) are notified within **five (5) business days**.