



## Registrant Privacy Policy

### Organizational Scope

The initial rollout of the Personal Support Worker (“PSW”) Registry of Ontario (“Registry”), will be conducted in phases and will commence with PSWs who have graduated from a recognized PSW program in accordance with the Registry’s [Education Requirements and Alternative Assessment Policy](#). The Registry will include information on Registrants whose education and training credentials have been verified, who have undergone a Police Record Check (i.e. Vulnerable Sector Check or Criminal Record Check), and who have agreed to adhere to the Registry’s [Code of Ethics](#), and ongoing reporting requirements. This policy applies to all PSWs who apply to be on, are currently on, or were previously listed on the Registry.

### Purpose

The Registry is committed to the protection of personal information and personal health information and privacy of its participating registrants. Information in the possession, custody, or control of the Registry will be collected, used, and disclosed in accordance to this policy and the [Registrant Terms of Use](#).

### Policy

Why we Collect, Use and Disclose your Personal Information or Personal Health Information

We will only collect, use, retain, manage or disclose personal information or personal health information as is reasonably necessary to the administration of the PSW Registry, or as may be required by virtue of data collection or reporting requirements lawfully imposed upon the Registry.

Consent

The Registry wishes to ensure that you understand and consent to the collection, use and disclosure of your personal information or personal health information. You may be asked to express your consent in a variety of ways including written, electronic (i.e. via email) and oral consent. There are times when your permission to collect, use and disclose information is not required, or may be implied from the circumstances. For example, legal, medical or security reasons may make it impossible or impractical to obtain your consent.



You may withdraw your consent at any time upon notice in writing at the contact listed below. However, it is necessary to collect, use and disclose personal information or personal health information for reasonable purposes connected to the administration of the Registry for its public safety mandate. Withdrawing or refusing your consent to collect, use or disclose personal information or personal health information may affect your continued relationship with the Registry, including your ability to register, remain on the Registry, and have your information shared with Registered Employers (and possibly on future iterations of the Registry which may include public-facing components). Withdrawal of consent will automatically lead to the deactivation of your account and the removal of your name from the Registry. The Registry will notify your Registered Employer if you withdraw from the Registry.

## Collection of Personal Information or Personal Health Information

The Registry will only collect personal information or personal health information:

1. where the Registrant has consented to its collection;
2. that is reasonably necessary for the operation of the Registry; or
3. as otherwise required by law.

## Use of Personal Information or Personal Health Information

Registry staff and IT personnel will be able to access your personal information or personal health information, but use will be limited to administering the Registry's operational functions. When Registry staff or IT personnel leave the organization, their access will be revoked.

The Registry will only use personal or personal health information in its custody or under its control:

1. where the person has consented to its use;
2. for the purpose for which the information was obtained or compiled;
3. for statistical analysis;
4. where the information is necessary and proper for the discharge of the Registry's functions and responsibilities; or
5. as otherwise required by law.

## Disclosure of Personal Information or Personal Health Information

The Registry will only disclose personal information or personal health information:

1. where the person has consented to its disclosure;
2. where Registry, in its sole discretion, decides that the disclosure is reasonably necessary for the discharge of the Registry's function and responsibilities. This includes but is not limited to the disclosure of information to the PSW's Registered Employer;



3. where disclosure is necessary to investigate an allegation that a person has made false statements or engaged in misleading or dishonest conduct relating to submissions made to the Registry;
4. to members of the Registry who have been designated as Registered Employers for the purpose of seeking to fill employment vacancies;
5. in circumstances necessary to protect the health and safety of an individual; or
6. as permitted or required by law.

## Accessing Your Personal Information or Personal Health Information

You may access your information by submitting a request in writing. There are times when the Registry will refuse access to personal information or personal health information, including, among other circumstances, where the access request would disclose information about another person; where the information was collected in the course of an investigation; or where the information is subject to legal privilege. Wherever possible, when the information contains pieces that should not be released, the information should be provided to you in redacted form (i.e., as much as possible should be provided, even if the complete document cannot be shared).

## Accuracy of Personal Information or Personal Health Information

The Registry takes reasonable steps to ensure that personal information or personal health information is accurate. You may request corrections to inaccurate personal information or personal health information by submitting a request in writing to the Registry at the address below.

## Retention of Personal Information or Personal Health Information

The Registry will retain information in accordance with its [Management, Retention & Disposal of Applicant and Registrant Records Policy](#), and [Management Retention and Disposal of Complainant Information Policy](#) as amended from time to time.

## Security of Personal Information or Personal Health Information

The Registry uses commercially reasonable security measures to protect against the loss, misuse and alteration of the personal information and personal health information. These safeguards vary depending upon the sensitivity, format, and storage of the personal information.



## Application Records

Notwithstanding anything in this policy, it is a condition of your application that you consent to the use, collection, and disclosure of information contained in your record as required for the administration of the Registry, including for the employer-facing components of the Registry as well as future iterations of the Registry which may include public-facing components.

In respect of files of applicants who are **not** accepted to the Registry, such files will be retained in accordance with the [Management, Retention & Disposal of Applicant and Registrant Records Policy](#). The Registry retains the right to refuse to disclose these files to any person except under Court Order or other legal requirement, and to keep confidential any information provided on a confidential basis.

## Updating of Privacy Policy

The Registry regularly reviews its privacy practices and updates this privacy policy as required. No notice will be provided for any subsequent updates. It is incumbent upon the users to check the Registry website for updated policies. The version that is publically posted on the Registry website at the time of inquiry or incident will be the version considered current.

## Contact Information

The Registrar's Office shall be the point of contact for all matters that relate to this policy. Any questions, concerns, or complaints relating to the Registry's Privacy Policy on the treatment of personal information should be emailed to [inquiries@psw-on.ca](mailto:inquiries@psw-on.ca).

## Definitions

**"Personal Information"** is defined as information about an identifiable individual and may include:

1. any identifying number, symbol or other identifier assigned to the individual (i.e., Registrant ID, IP Address, etc.);
2. information related to the race, national or ethnic origin, colour, religion, age, sex, sexual orientation, disability or marital or family status of the individual;
3. the home address or telephone information of the registrant, applicant, or complainant;
4. correspondence or other communications received from the individual that is implicitly or explicitly confidential, and reply correspondence that would reveal the contents of the originals;
5. information relating to the educational, medical, psychiatric, psychological, or employment history of the individual or about financial transactions; or



6. the individual's name where it appears on other personal information relating to the individual or where the disclosure of the name would reveal other personal information about the individual.

"Personal Information" **does not** include:

1. information about an individual who has been dead for more than 30 years;
2. the name, title, contact information or designation of an individual that identifies the individual in a business, professional or official capacity; or
3. where a PSW is not self-employed, the address of their primary employer.

"Personal Health Information" is identifying information about an individual relating to physical or mental health or the provision of healthcare to that individual and is defined further in section 4 of the *Personal Health Information Protection Act, 2004*, SO 2004, c 3, Sch A.

### Associated Documentation:

- *Registration Application* ([hyperlink](#) to PDF form)
- [Registration and Renewal Policy](#)
- [Complaints Policy & Process](#)
- [Management, Retention & Disposal of Applicant and Registrant Records Policy](#)
- [Management, Retention & Disposal of Complainant Information Policy](#)