

Management, Retention, & Disposal of Applicant and Registrant Records Policy

Introduction:

A registration record refers to any information or record received and/or created in the normal course of business and retained as part of a registrant's or applicant's record 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 Registry of Ontario.

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

- Application/Registration form;
- All consents provided to the Registry;
- Requests for supplemental or additional information;
- Correspondences between the Registry and the applicant/registrant;
- Complaint information about a registrant;
- All documentation with respect to appeals; and
- All communication between the Registry and the applicant/registrant.

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 a Registrant's Registered Employer or applicable third-parties when the Registry, in its sole discretion, decides that the disclosure is reasonably necessary for the discharge of the Registry's function or the protection of the public.

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. The primary database is located at the University Health Network (UHN) while the secondary database is hosted in Montreal, Quebec, Canada. The primary database 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 electronic 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:

Active Registrants:

While Registrants remain on the employer view of the Registry and possible future iterations of the Registry which may include a public view, the Registry will retain the Registrant's records until the Registry ceases to exist, only at this point will records be disposed.

Unsuccessful Applicant:

Applicants who are not accepted to the Registry will have their information retained by the Registry for a period of **two (2) years** from the date of their rejection. 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 Registry database.

Registrants Who Withdraw Consent to Share Personal Information:

A Registrant who withdraws their consent to have their personal information shared on the employer-facing Registry (and possible future iterations of the Registry which may include a public-facing component) may do so at any time. Consent can only be withdrawn through written notice to the Registry at registration@psw-on.ca or by mail at the following address to 222 St. Patrick St., Toronto, ON, M5T 1V4, ATTN: Personal Support Worker Registry of Ontario.

A registrant who withdraws consent will, within **five (5) business days**, no longer appear on the employer view of the Registry. The Registry will notify the Registrant's Registered Employer of their withdrawal. The Registry will retain their information for a period of **ten (10) years** from the date the consent was withdrawn. The Registry will retain the information of all inactive registrant accounts for a period of **ten (10) years** from the date that their registration was granted or until such time the Registry ceases to exist, whichever may come first. 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:

Registrants who wish to correct or change their personal information may do so by filling out the Request for Information form, available on the website (www.psw-on.ca). The form can be returned by electronic mail 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 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 are notified within **five (5) business days**.

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