On behalf of the OAMHP, formerly the OACCPP, we are writing in response to the open consultation regarding by-law 21.08.

As an Association representing over 2,000 Registered Psychotherapists, we are pleased to offer some comments and observations with respect to the proposed amendments, specifically in the area of what information goes onto the public register.

With regard to the by-law 21.08, changes by the Health Professions Procedural Code being recommended, the Association is in favour of this measure, provided opportunity is afforded, based on reasonable grounds, to expunge the record of conviction should at least one of the three conditions identified in paragraph 1 of subsection (1) of the RHPA are met:

1. The Parole Board of Canada has ordered a record suspension in respect of the conviction.
2. A pardon in respect of the conviction has been obtained.
3. The conviction has been overturned on appeal.

In the course of reviewing the above and the discussion that ensued, a number of concerns were identified - so we additionally submit these in the form of questions to the College:

1. Are the charges posted relevant to the clinical practice of an individual or would all charges ever made against said registrant be listed?
We believe it is discriminatory to post convictions unrelated to clinical practice.

2. Can you please clarify documents required for expungement? We also hope your process for removal of conviction records that have been expunged is as efficient as the process for listing allegations.

Thank you for the opportunity to provide comment on this item of key importance to our membership and to the public.

Sincerely,

Suzanne Dennison, DCS., RP (cert)OAMHP
President, OACCPP/OAMHP
The Ontario Association of Mental Health Professionals