# NOVA SCOTIA COLLEGE OF SOCIAL WORKERS (NSCSW)

Fair Registration
Practices Act (FRPA)
PROGRESS REPORT
February 2020

Province of Nova Scotia



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# **Executive Summary**

The Nova Scotia College of Social Worker's (NSCSW) 2020 Action Plan was developed in response to findings based on their biennial review of registration practices, as per requirements of the *Fair Registration Practices Act (FRPA)*. The review has identified both progress made to date and opportunities for continuous growth toward fairer assessment of all applicants and registration practices.

The NSCSW has addressed most of the actions that were in the Action Plan assigned in 2017. Notable improvements have been made to the applicant portion of the website which now includes a plain language step by step registration process, and an online database through which applicants can upload documents and track their application status. Transparency has been increased by making response times to inquiries available to applicants and ensuring that applicants can access information pertaining to all fees associated with registration, including those associated with third party assessment. The internal review policy has been expanded to include timelines and amended Regulations to ensure that requests for appeal are now forwarded directly to the Registration Appeal Committee. Both improvements support a more transparent and impartial registration appeal process.

NSCSW will carry over two actions from the 2017 plan which remain incomplete: establishing a policy on acceptable forms of alternative documentation and; establishing a consistent process under which requests for access to records are considered. Though these situations are usually handled through a third party, NSCSW has agreed to develop a policy and process that would pertain to personal documents required by or held by NSCSW. As another high priority, NSCSW will develop a streamlined process for applicants already registered in another Canadian jurisdiction and implement a process for assessing applicants in accordance with the Legitimate Objective Exception (LOE). It has been noted that the current LOE is due to be reviewed and NSCSW will work with the Labour Mobility Coordinator to review and update the LOE to reflect current needs. Since these actions are indicators of non-compliance with the FRPA, NSCSW is expected to address these priority items in the short term with report back to the FRPA Review Office on completion of each action.

NSCSW has demonstrated a commitment to continuous improvement of registration practices. Over the next two years NSCSW will address the following actions for improvement that have resulted from the 2020 FRPA review process:

- Clarify criteria pertaining to the experience requirement for registration and make available to applicants;
- Develop a policy on registration decisions, including standard timelines and reasons for decisions;
- Create a visual pathway (flow chart) as an alternative presentation of the steps to licensure for applicants;
- Enhance the internal review process by adding the timeline for decision making and clarifying the recipient of the decision.

We appreciate NSCSW's responsiveness and open discussion throughout the FRPA progress review and thank NSCSW for their cooperation.

Sincerely,

Patricia Mertins

Patricia Martiis

Review Officer, Fair Registration Practices Act (FRPA)

# Introduction

The Fair Registration Practices Act (FRPA) mandates that regulating bodies carry out registration practices that are transparent, objective, impartial and procedurally fair. <sup>1</sup>The FRPA review process was designed to fulfill the obligations of the legislation; it allows the FRPA Review Officer and the regulating bodies to review existing registration practices for current compliance with the FRPA as well as continuous improvement of transparent, objective, impartial and procedurally fair registration practices. <sup>2</sup>

The purpose of the Fair Registration Practices Act (FRPA) Progress Report is twofold. First, it allows the Nova Scotia College of Social Workers (NSCSW) to review and report on its current registration practices. Second, it shares the NSCSW's progress on previously identified areas for improvement and highlights the exemplary practices that have been developed by the NSCSW since their previous review.

Through the 2020 FRPA Progress Report, the FRPA Review Officer aims to build on the progress made by NSCSW to date and identify opportunities to further improve and evolve registration practices.

NSCSW

<sup>&</sup>lt;sup>1</sup> The Fair Registration Practices Code is delineated in Sections 6-12 of the Fair Registration Practices Act. Government of Nova Scotia. Ch. 38 of the Acts of 20018, as amended by 2014, c. 14.

<sup>&</sup>lt;sup>2</sup> For more information on the FRPA Review Process, see the *Guide to Fair Registration Practices Act*: http://novascotia.ca/lae/RplLabourMobility/documents/FRPA GuidetoReviewProcess WEB.pdf

# Context of the Profession in Nova Scotia

# **Occupational Profile**

Social work is a practice-based profession and an academic discipline that promotes social change and development, social cohesion, and the empowerment and liberation of people. Principles of social justice, human rights, collective responsibility and respect for diversities are central to social work. Underpinned by theories of social work, social sciences, humanities and indigenous knowledge, social work engages people and structures to address life challenges and enhance wellbeing.

- 5A (1) For the purpose of this Act, the practice of social work means the provision of professional services to clients through the use of social work knowledge, theory, skills, judgement and values acquired through a program from an approved faculty of social work.
- (2) The professional services to clients referred to in subsection (1) may include:
  - (a) intervention through direct contact with clients, including assessment, case management, client-centered advocacy, education, consultation, counselling, crisis intervention and referral;
  - (b) community development founded on the principles of social justice that focus on mobilizing individuals to employ their skills to effect community change by community capacity building and community- based participation research; and
  - (c) direct or indirect provision of administrative, educational, policy or research services including:
    - (i) the development and promotion of social policies focused on improving social conditions and promoting social justice,
    - (ii) the development, the provision and the administration of social-work services programs, and
    - (iii) the supervision of individuals providing social work services; and

# **Organizational Description**

The Nova Scotia College of Social Workers exists to serve and protect Nova Scotians by effectively regulating the profession of social work. We work in solidarity with Nova Scotians to advocate for policies that improve social conditions, challenge injustice and value diversity.

### **Our Pillars**

In delivering its mandate, NSCSW focuses on the following key areas:

# Regulation

We establish, maintain and regulate standards of professional practice to ensure Nova Scotians receive the services of skilled and competent social workers who are knowledgeable, ethical, qualified and accountable to the people who receive social work services.

# Member

Services We provide membership services to support registered social workers in maintaining the highest standards of professional competency, and that enable participation in a broader provincial social work community.

# **Engagement & Communication**

We engage with members, Government, employers, community groups, and citizens to build a stronger social work community, and to advance the social work profession in Nova Scotia.

### Advocacy

We engage with Nova Scotia's social work community in advocating for improvement to social policies, programs, and social justice.

# **Leadership & Accountability**

We provide responsive, accountable leadership to ensure the highest standards of social work for Nova Scotians.

# Our Values

Our work is grounded in integrity and professionalism which calls on us to be:

- Respectful
  - The College is respectful of the inherent dignity of every individual and strives for cultural humility and social change.
- Accessible
  - NSCSW provides communication and services that are accessible province-wide for members, stakeholders, and the public.
- Ethical
  - NSCSW follows the established national Code of Ethics that adheres to the values of the social work profession.
- Progressive
  - NSCSW is proactive in reflecting the values of social work, and supports innovation through education, research, and transformative community engagement, for the sake of social justice.

### **Active Membership Requirements**

All Active Registered Social Workers (including employed, unemployed and self-employed individuals) are required to maintain 40 hours of professional development activity in social work each year. Members will be asked to report their activities upon renewal of their registration. Reporting may include formal and informal activities outlined in the NSCSW professional development activities found on the NSCSW website.

# **Registration Requirements**

An application for registration with the College with a degree in a social work from an accredited school shall include the following information, which is uploaded directly to the applicants' profile:

- 1. Completed online application form accompanied by a non-refundable \$100.00 application fee
- 2. Consent for release of information to employer concerning status of your application
- 3. The name and contact information of two references. An electronic reference form will be emailed for completion to the selected references
- 4. Current Resume
- 5. Job description (if employed)

The following, original documents must be mailed directly to the College:

- University transcript (BSW/MSW) sent from University directly to the NSCSW or
  - A letter from the University confirming completion of BSW/MSW degree program (if you are awaiting convocation)
- 2. Criminal Record Check (contact local police or visit http://www.backcheck.net/nscsw/)
- 3. Child Abuse Registry Check

### **CFTA Transfers**

All Applications who are currently Registered in another province must include the following documentation, which must be uploaded to their applicant profile:

- 1. Completed online application form accompanied by a non-refundable \$100.00 application fee
- 2. Consent for release of information to employer concerning status of your application
- 3. The name and contact information of two references. An electronic reference form will be emailed for completion to the selected references
- 4. Current Resume
- 5. Job description (if employed)

The following original documents must be mailed directly to the College:

- 1. A letter of good standing from your provincial regulatory authority
- University transcript (BSW/MSW) sent from University directly to the NSCSW Or
- 3. A letter from the University confirming completion of BSW/MSW degree program (if you are awaiting convocation)
- 4. Criminal Record Check (contact local police or visit http://www.backcheck.net/nscsw/)
- 5. Child Abuse Registry Check

# **International Applicants**

An application for registration with the College with a degree in a social work from an unaccredited CASWE or CSWE school must have their credentials assessed through the CASW. Applicants must also upload to their applicant profile:

- 1. Completed online application form accompanied by a non-refundable \$100.00 application fee
- 2. Consent for release of information to employer concerning status of your application
- 3. The name and contact information of two references. An electronic reference form will be emailed for completion to the selected references
- 4. Current Resume
- 5. Job description (if employed)

Original copies of the following documents must be mailed directly to the College:

- 1. An Assessment of Credentials from the CASW
- 2. Criminal Record Check (contact local police or visit <a href="http://www.backcheck.net/nscsw/">http://www.backcheck.net/nscsw/</a>)
- 3. Child Abuse Registry Check

# **Organizational Structure and Staffing**

The NSCSW is governed by an elected Council. The President, Vice-president, Secretary, Treasurer, Immediate Past President and other members are elected or appointed and hold office in accordance with the by-laws. The Council is responsible for the business and affairs of the College and may exercise such powers and functions as are conferred or imposed upon it by the Social Workers Act or the by-laws. The NSCSW Council's priority is protection of the public.

To ensure the regulatory, complaints and discipline decisions of the College are at arm's length from the overall governance of the organization, the Board of Examiners has autonomy over regulatory issues, complaints and discipline decisions, except for when the act or regulations grant an appeal process.

The NSCSW Council employs an Executive Director/Registrar, who oversees the operations of the College, as well as:

- Regulatory and Candidacy Consultant
- Regulatory and Applications Administrator
- Professional Practice Consultant
- Communication Coordinator
- Executive Assistant

For details on each job description, see: <a href="http://nscsw.org/about/nscsw-staff/">http://nscsw.org/about/nscsw-staff/</a>

# Types of Licenses/Certificates Issued

Social Worker Candidate

Registered Social Worker

**Private Practitioner** 

Associate

**Associate Retired** 

# Overview of Registration Process

### **Registration Information**

An automated, on-line form is accessible via the NSCSW website: www.nscsw.org

A process for applicants to track application status is available too applicants through their online application folder

# **Registration Process**

Once an applicant submits all required documentation, the completed application is presented to the Board of Examiners.

### Time for Processing

Completed applications are presented to the Board of Examiners for approval. All material must be available 10 days prior to the Board meeting. The Board meets monthly, eleven times a year. Notification of the Board's decision is mailed

to applicants within a week after the decision. Applicants names are added to the Register of Social Workers and Social Worker Candidates within one week of approval.

Pending review of an application by the Board, the Registrar may grant temporary registration for a period of up to 30 days.

Applicants denied licensure are informed in writing with reasons within 2 days of the decision.

# **Application Procedure**

Once an applicant has completed the application form and paid the application fee, they have 6 months to submit all of their supplemental application documentation (eg. transcripts, criminal record check, etc.).

Once the application has been approved by the Board of Examiners, the applicant has 30 days to pay the registration fee.

# Information on Registry

All Registered Social Workers and Social Worker Candidates are required to provide the Board of Examiners with the following information:

- a current address
- telephone number
- place of employment

# **Registration Appeal**

Upon the Board's refusal to issue a certificate of registration, the Executive Director/ Registrar will inform the applicant in writing and provide reasons with the Registrar's proposal. In the cover letter of the Registrar's proposal, applicants will be informed that they may request a review of the Board of Examiner's decision to refuse to issue a certificate of registration within 30 days of receipt of the Registrar's proposal.

In the event that an applicant appeals the initial registration decision, the Registration Appeals Committee will conduct an internal review. This may take several months before the Committee begins the review of your request. The length of time it takes for the Committee to render a decision depends on the unique circumstances of each individual's application, additional information submitted during the review process and the Registrar's proposal.

# **Cost of Registration (including payment methods)**

Date	Active	Associate
January 1 – December 31	\$\$440	\$\$220
April 1 – December 31	\$\$330	\$\$165
July 1 – December 31	\$\$220	\$\$110
October 1 – December 31	\$\$110	\$\$55
Student Member	\$10	
Retired Associate Member	\$50	
Application Fee	\$100	
Re-Instatement Fee	\$25-100	
Private Practice Application Fee	\$50	

Private Practice Listing Fee (one-time payment)	\$50	
Accepted payment type: payments can be made or		credit card, debit or cheque
Accepted payment type, payments can be made of	illie, by telephone, of ill the office via	credit card, debit of cheque.

# Summary from 2017 FRPA Review Report

The following table summarizes the Action Plan from the Nova Scotia College of Social Workers 2017 Review Report and the progress that has been made by the NSCSW in achieving each action item.

ш	A atia ia	FDDA	Compulated	Net	Outromo/Bationala
#	Action	FRPA	Completed	Not	Outcome/Rationale
		Reference		completed	A 11 11 11 11 11 11 11 11 11 11 11 11 11
1	Continue to enhance website to include:	16(3)(g)	Completed		Application pages have all been updated with plain language and visual pathways and applicants are able to track the status of their application through our online application portal.
	reviewing/updating the				
	website.				
2	Develop and document clear criteria to assess applicants for registration as a private practice social worker and make criteria available to applicants.	7(d), 16(3)(b)	completed		We have created an application page specific to private practitioners: <a href="http://nscsw.org/private-practice/become-private-practitioner/">http://nscsw.org/private-practitioner/</a>
3	Add rationale and additional measures of CFTA legitimate objective exception to website.	3		Х	Waiting to review and update legitimate objective with provincial Labour Mobility Coordinator before posting LOE to the website.
4	Develop a formal policy regarding accommodations for applicants with physical/mental disabilities and make it available to applicants.	16(3)(h)	completed		This can be found in our application and renewal policy manual: BOE#13 found on page 17
5	Develop formal policy and procedures re: response times to inquiries and make it available to applicants.	7(b), 8(a), 8(b), 8(c)	completed		This can be found in our application and renewal policy manual: BOE#12 found on page 16
6	Develop a formal	9(b),		In	The CASW is currently updating their
	policy/process regarding	16(3)(c)		progress	assessment process and is exploring

	the acceptance of alternative information if required documentation cannot be obtained for reasons beyond the applicant's control.  After discussion with NSCSW it was decided to carry this action forward to the 2020 Action Plan.				options to assess degrees where information may be missing.  NSCSW only requires letter of equivalency from CASW. There is not a need for this requirement as international applicants have their degrees assessed outside of the NSCSW.  All other university transcripts are coming for Canadian and American accredited universities, the likelihood that an applicant would not be able to request a transcript from these institutions is of low probability.
7	Add information to NSCSW website re: cost of credential assessment by third party (CASW).	6, 9(b), 16(3)(c)	completed		Fees can be found on the international applicants webpage: http://nscsw.org/applicants/international-bswmsw/ in addition to the main applicant page: http://nscsw.org/applicants/
8	Develop, document, and publish a formal policy to provide access to documentation in the situation where an applicant's registration file contains documents not provided by the applicant.  After discussion with NSCSW it was decided to carry this action forward to the 2020 Action Plan.	12, 16(3)(j)		In progress	It was assessed that this requirement was not nessaccry for NSCSW practices as there are no files kept at the NSCSW that the applicant would not have access too. All records kept on members profile, which members have access too at any time. Written notifications, are sent to applicants would receive notice of application status within 5 days of Board of Examiners decision as outlined in Policy #BOE12
9	<ul> <li>Expand the policy/Regulations regarding the internal review process to include:</li> <li>a defined timeframe on when an unsuccessful applicant will be notified to their right to request an internal review,</li> <li>a defined timeframe on when the applicant will receive</li> </ul>	7(a), 10(1), 10(3)	completed		In the application and renewal policy manual policy #BOE24 found on page 31 addresses all these points.

		1	Г	T	
	documentation				
	relevant to their				
	application for				
	appeal purposes (per				
	Regulation 14(1)(b),				
	and				
	a defined timeframe for				
	the internal review panel				
	to issue its decision, per				
	Regulation 15(4).				
10	Amend s.14(1)(a) of	7(a), 10(5),	Completed		Regulations updated section 14(1)b shows
	Regulations so that	16(3)(n)			applications for appeal go right to the
	requests for internal				appeal committee.
	review are forwarded				
	directly to the				http://nscsw.org/wp-
	Registration Appeal				content/uploads/2016/10/SW-
	Committee (suggest				Regulations-Updated-November-2019.pdf
	striking phrase				
	"determine if the claim				
	1			ı	

# **Exemplary Practice**

A program, activity or strategy that has been shown to:

- improve transparency, objectivity, impartiality and fairness of registration practices,
- produce successful outcomes for regulators and/or applicants, and
- be effective in accordance with qualitative and/or quantitative data sources.

Name of the		
Exemplary Practice:		
Exemplary Practice	☐ Acceptable alternatives for meeting registration requirements	☐ Training for decision-makers
• •	☐ Recognition of Prior learning / work experience	☐ Governance
Category:	☐ Cultural competency, equity, diversity and inclusion	☐ Access
	☐ Collaboration at regional, national level	□ Outreach
	Making or communicating registration decisions	☐ Workforce integration
	☐ Impartial, objective and consistent assessment	☐ Exams
	☐ Preparation and pre-arrival support	☐ Appeals
	☐ Assessment criteria and methods	
Description:	The new database development has led to quicker mor	e transparent application
	process. Applicants can track, there status, any docume	ents that the NSCSW do not
	require original copies of) can be uploaded and accesse	
		a at any time and the
	system is user-friendly.	
Value to Applicants:	A guick and clear turnaround on applications	
Value to Applicants:	A quick and clear turnaround on applications	
Value to Applicants: Value to Regulators:	A quick and clear turnaround on applications  Quick and simple administration	
		login
Value to Regulators:  Link to further	Quick and simple administration	login
Value to Regulators:	Quick and simple administration	login

# 2018 Registration Data

	Question	Response			
1	Total number of individuals with practicing licenses/certifications. Do not report on any licenses or certificates you issue to a business, school or group.	1,958			
2	Number of registrations for the reporting year, from applicants who received	ived their qualifications as indicated			
	<ul> <li>Received qualifications (training/work experience for trades) In NS, new applicant.</li> </ul>	68			
-	<ul> <li>Received qualifications In Canada, new applicant - n/a for trades - issue a Certification of Qualification.</li> </ul>	89			
-	<ul> <li>Received qualifications (training/work experience for trades)         Internationally, new applicant.     </li> </ul>	10			
-	<ul> <li>CFTA Transfers, applicants already registered in another Canadian jurisdiction.</li> </ul>	31			
	Total number of applicants.	198			
3	Types of practicing licenses/certificates you issue and total number of individuals for each type identified for the reporting year.				
	License/certificate name: Social Worker Candidates	385			
-	License/certificate name: Registered Social Workers	1,184			
	License/certificate name: Private Practitioners	251			
	License/certificate name: Associate Members	138			
4	Number of completed applications submitted by applicants who received below.	their qualifications as indicated			
	<ul> <li>Received qualifications (training/work experience for trades) in NS, new applicant:</li> </ul>				
	o Accepted:	68			
-	o Rejected:	1			
	<ul><li>Still in process:</li></ul>	0			
	o Withdrawn:	0			
_	File inactive or closed:	0			

	Received qualifications In Canada, new applicant:	
-	o Accepted:	89
-	o Rejected:	0
-	<ul><li>Still in process:</li></ul>	0
-	o Withdrawn:	0
-	o File inactive or closed:	0
-	<ul> <li>Received qualifications (training/work experience for trades) internationally, new applicant:</li> </ul>	
-	o Accepted:	9
}	o Rejected:	1
-	<ul> <li>Still in process:</li> </ul>	0
-	o Withdrawn:	0
-	File inactive or closed:	0
-	<ul> <li>AIT transfers, applicants already registered in another Canadian jurisdiction:</li> </ul>	
-	o Accepted:	31
-	o Rejected:	0
-	<ul><li>Still in process:</li></ul>	0
-	o Withdrawn:	0
-	o File inactive or closed:	0
5	For those new Canadian applicants (not NS), list the provinces in Canada (level of education to qualify the applicant for licensure (training or work of	<del>-</del>
-	Alberta	6
-	British Columbia	12
-	Manitoba	22
-	New Brunswick	15

	Newfoundland	6
	Ontario	25
	• Quebec	2
	Saskatchewan	1
6	For new international applicants, list the source countries (and associated received the level of education to qualify them for licensure (training or w	
	• India	2
	United States	6
	• Kenya	1
	• Ireland	1
7	Average length of time (in days) between receipt of a completed applicate those who received their qualifications as indicated below. Response to t meet the requirements, partially meet and need to fill gaps, or there is no a consideration.	he applicant to include whether they match and other pathways might be
	<ul> <li>Received qualifications (training/work experience for trades) In NS, new applicant:</li> </ul>	2
	Received qualifications In Canada, new applicant:	2
	<ul> <li>Received qualifications (training/work experience for trades)</li> <li>Internationally, new applicant:</li> </ul>	2
	<ul> <li>CFTA transfers, applicants already registered in another Canadian jurisdiction:</li> </ul>	2
8	Average registration process time (or application approval) for those who indicated below.	received their qualifications as
	<ul> <li>Received qualifications (training/work experience for trades) In NS, new applicant:</li> </ul>	14
	<ul> <li>Received qualifications In Canada, new applicant - n/a for trades - issue a Certification of Qualification</li> </ul>	14
	<ul> <li>Received qualifications (training/work experience for trades)</li> <li>Internationally, new applicant</li> </ul>	14
	CFTA transfers, applicants already registered in another Canadian jurisdiction	14

9	Total costs (to the applicant) associated with registration (certification) for applicants who received their qualifications as indicated below. Separate costs that the regulatory body themselves imposes on the applicant from other necessary costs incurred related to registration.						
	Received qualifications (training/work experience for trades) In NS, new applicant:	Regulatory body costs: \$516 Other: \$45					
	Received qualifications In Canada, new applicant:	Regulatory body costs: \$516 Other: \$45					
	<ul> <li>Received qualifications (training/work experience for trades) internationally, new applicant:</li> </ul>	Regulatory body costs: \$516 Other: \$380					
	<ul> <li>CFTA transfers, applicants already registered in another Canadian jurisdiction:</li> </ul>	Regulatory body costs: \$516 Other: \$45					
10	Number of appeals, internal reviews or challenges related to a registratio received their qualifications as indicated below:	n decision from applicants who					
	<ul> <li>Received qualifications (training/work experience for trades) In NS, new applicant:</li> </ul>	1					
	Received qualifications In Canada, new applicant:	0					
	<ul> <li>Received qualifications (training/work experience for trades)</li> <li>Internationally, new applicant</li> </ul>	0					
	<ul> <li>CFTA transfers, applicants already registered in another Canadian jurisdiction:</li> </ul>	0					
11	Length of time the appeals or internal review process took for applicants indicated below:	who received their qualifications as					
	<ul> <li>Received qualifications (training/work experience for trades) In NS, new applicant:</li> </ul>	60					
	Received qualifications In Canada, new applicant:	N/A					
	<ul> <li>Received qualifications (training/work experience for trades)</li> <li>Internationally, new applicant:</li> </ul>	N/A					
	CFTA transfers, applicants already registered in another Canadian jurisdiction:	N/A					
12	What does registration with your organization authorize?	Scope of practice rights and rights to use an occupational title					

# FRPA Review Questionnaire and Assessment

	Question	Respondent Answer	Compliance Guideline	Review Finding	FRPA Reference
1a	How (what methods) do you use to provide information to potential applicants on your registration practices? (i.e. internet, individual counselling, hard copies)?	Internet, email, Telephone, Automated online form, Other  Other: in person  Potential applicants receive information in regard to our registration practices via our website, by calling our regulatory and applications administrator, via email or in person.  http://nscsw.org/applicants/	Level 1 Paper forms and information made available to applicants via regular post, Telephone Level 2 E-mail forms and information, telephone. Forms and information can be downloaded from website to be emailed / faxed / mailed in after completion Level 3 Automated on-line form on website and information is easily accessible on a website Process in place for applicants to track application status	Level 3	16(3)(g)
1b	Can applicant begin the process outside of Canada?	Yes  Applicants can begin their online application from anywhere that has an internet connection. Applicants are able to email, fax or snail mail in any all required documents. <a href="http://nscsw.org/applicants/international-bswmsw/">http://nscsw.org/applicants/international-bswmsw/</a>	Level 1 No Level 2 Yes	Level 2	
2 2a	Please provide a link to your website.  I believe that information on our website is: clear and understandable, written in plain language?	http://nscsw.org/  1 (Strongly Agree)  2  3  4  5 (Strongly Disagree)	Level 1 No website  Level 2 Website is not up to date  Website is not in plain language  Website does not have links for international applicants  Website does not contain	Level 2	16(3)(g)
2b 2c	On what basis do you make changes to your website? When was the section of the website pertaining to registration last updated?	Feedback from Applicants, Policy Change  On-going  The website content pertaining to registration is updated on an ongoing basis to reflect changes in policy and	all forms and/or guidelines  Level 3  Website content is reviewed for accuracy and updated annually		

		regulation and based on feedback from current and prospective members of the college. For example, pages for applicants have been updated this year to clarify documentation standards. Sections about registration fees on several pages were substantially rewritten in September, to accurately reflect an increase in fees approved at the May 2019 AGM that takes effect for 2020 registrations/renewals, and to resolve recurring confusion amongst some members about pro-rated fees. PDFs containing bylaws and regulations of the college have been updated this year as well. Private practice pages are now under review, and a substantive revision will likely be published later this fall.	Website is in plain language Website is easy to navigate (e.g. international applicants) Website contains all forms and/or guidelines Information on pathway to licensure		
3a	Are your requirements (e.g. education, work experience, examination and fees) for registration specified by legislation, regulation and/or policy?	Legislation, regulation, policy	Level 1 Policy describing the registration process does not exist or is not documented  Documents only available upon specific request	Level 2	7(a), 7(c), 7(f), 16(3)(a), 16(3)(d)
3b	Specify the appropriate section(s)	Legislation: Education, work experience, and examination: Social Workers Act, Sections 22(1) and 22(2) Regulations: Education, work experience, and examination: Sections 1-2 of the NSCSW's Regulations. By-Laws: Sections 32-34, 37, Schedule A			
3c	Is this information made available to applicants	Yes  We have an application page for each application type: Canadian BSW/MSW: http://nscsw.org/applicants/canadian-bswmsw/  Registration from another Province: http://nscsw.org/applicants/registered-from-another-province/  Registration from the USA with a BSW/MSW: http://nscsw.org/applicants/united-states-bswmsw/  International applicants with a BSW/MSW: http://nscsw.org/applicants/international-bswmsw/	aspects of the registration practices  Available to the applicant		
4	Are you waiting for legislation to be passed?	No	N/A	N/A	
5a	Is the criteria for meeting the	Yes	Level 1	Level 2	

5b	requirements of registration documented?  Do you provide applicants with the description of the criteria used to assess whether the requirements have been met (i.e. the number of years of schooling needed to be considered equivalent to a degree)?	Each stream of applicant has a dedicated application page and all applicants can find information in regard to registration requirements, fee's, registration appeals, translation of documents, academic qualifications etc. http://nscsw.org/applicants/  Yes  As of now the education requirement is a BSW or MSW at minimum. This information is provided in the Act and Regulations as well as the website http://nscsw.org/applicants/  Other criteria are also described such as experience necessary (Section 22(2) of the Act)	Criteria is made available to applicants verbally but no supplemental documentation  Level 2 Criteria is documented and made available to applicants  Limited information about the standard you will be assessed against  Level 3 Criteria is documented and made available to applicants  Criteria clearly outlines all assessment methods to be used and what competencies are being assessed by each method  Applicants know the required standards that they will be assessed to		7(d), 16(3)(b)
6	If you require translation of specific documents how is the applicant informed?	From our website Translation of Documents: Documents that are not in English must be translated before they are submitted to the College and/or a credentials evaluation agency. You must provide your original documents plus a precise word-for-word translation in English. This must be a certified translation, accompanied by a cover letter from an accredited translator including: The exact name of the documents which have been translated. The method by which the accredited translator received the documents. Any comments about the accuracy of your documents. The date of the translation. The accredited translator's identification number and/or seal. Can be found on the following webpage: http://nscsw.org/applicants/	Level 1 No indication of translation requirements Available to applicants upon request Level 2 Translation requirements indicated but not specific Available to applicants Level 3 Translation requirements documented with specific instruction Available to applicants	Level 3	7(a)
7	Do you have a streamlined registration process for those applicants already registered in another Canadian jurisdiction (as per Chapter 7 Agreement on Internal Trade / Canada Free Trade Agreement)?	Registrants from another province are required to submit a letter of good standing from their registering body and follow the application process for applicants within Nova Scotia.  http://nscsw.org/applicants/registered-from-another-province/	Level 1 Yes – process not documented Level 2 Yes – process documented Level 3 Yes – process documented and made public on website Any additional requirements approved by	Level 1	3

			government are explained on website		
8	Does your organization make accommodation for applicants with physical or mental disability?	Yes  Accommodations for Applications Policy #BOE13	Level 1 Yes – process not documented Level 2 Yes – process documented Level 3 Yes – process documented and available to applicant	Level 3	16(3)(h)
9a	Is any of your assessment process conducted by a third party (i.e. national bodies, credential assessment agencies, etc.)?	Yes	Level 1 Regulatory body assumes that the certifying organization meets FRPA standards Level 2 Regulatory body has	Level 3	16(3)(i)
9b	If so, please specify the name of the organization and describe their role.	Canadian Association of Social Work Educators: Accredit SW programs Canadian Association of Social Workers (CASW): assess international credentials	received documentation indicating that the certifying organization meets FRPA standards		
9c	Please indicate the types of activities that they assist with.	Credential assessment, verification of documents, recognition of prior learning	Level 3 Regulatory body has influence with the		
9d	Can you describe how they adhere to the General Duties of the Regulatory Body as outlined in the Act, including transparency, objectivity, impartiality and procedural fairness?	MOU	certifying organization (e.g. membership) or has an agreement with the certifying organization		
9e	Are you informed of all decisions made by third parties on applicants?	Yes			
9f	Does the third party have an internal review process for unsuccessful applicants?	Yes  Research, publications, consultation, member support <a href="http://caswe-acfts.ca/about-us/mission/">http://caswe-acfts.ca/about-us/mission/</a>			
10a	What types of supports do you provide to applicants during the registration process?	Internet, telephone, print material, email	Level 1 None Level 2	Level 3	7(e), 16(3)(k)
10b	Have you had applicants who need support mechanisms that you can't provide or are not available?	Print: A letter is mailed to the proposed supervisor of an applicant explaining what they are required to provide. Telephone: Our applicants call for clarification, or to check that we have received all that is needed for their application. Other: We will email applicants who have not yet submitted all their required documents to remind them of what they still need.	Multiple types of supports exist but not well documented  Level 3  Multiple types of support exist, well defined and accessible		

11	Where practical, do you provide unsuccessful applicants with information on programs and services they can participate in to facilitate successful registration in the future?	Yes  If they are missing qualifications, they will be informed of what those qualifications are. If we are aware of schools that will accommodate them, we will inform them of the school and program. In private practice applications for example, applicants may sometimes not have the necessary experience for the specialization they wish to pursue, and this will be indicated to them.	Level 1 Only upon request Not documented Level 2 Yes – not documented Level 3 Yes – documented and available to applicant Applicants are told what their competencies gaps are that need to be addressed	Level 2	8(d)
12	Do you have a reasonable timeframe to respond to inquiries from applicants?	1 Very Reasonable 2 3 4 5 Very Unreasonable  http://nscsw.org/about/customer-service-policy/	Level 1 No policy Level 2 Policy in Place Level 3 Policy in place and accessible	Level 3	7(b), 8(a), 8(b), 8(c)
13a	Do you provide written decisions, responses and reasons for acceptance or rejection of an application?	Yes	Level 1 Upon request, limited documentation and no standard timeline	Level 2	8(b), 8(c), 10
13ai 13aii	Do you have a formal policy for this process?  Do you have a standard timeline	Yes	Level 2 Some documentation  Level 3 Well-documented process with clearly established timelines		
13b	Do you provide applicants who are not granted registration with information regarding an internal review process (including the opportunity to make submissions respecting such reviews?)	Yes  Our 2016 Regulations include a registration appeal process which is very clearly laid out. Applicants are made aware of our process and timelines and we ensure communication through email and registered mail.  http://nscsw.org/applicants/registration-appeal/	Level 1 Yes – upon request, limited documentation Level 2 Yes – limited documentation Level 3 Yes – well documented process	Level 2	
14a	Do you provide information on what documentation of	Yes	Level 1	Level 2	9(a), 16(3)(a),

	qualifications must accompany an application?	Each stream of applicant has their own application page which documents what the applicant is required to submit.  New Canadian applicants: <a href="http://nscsw.org/applicants/canadian-bswmsw/">http://nscsw.org/applicants/canadian-bswmsw/</a> CFTA transfers: <a href="http://nscsw.org/applicants/registered-from-another-province/">http://nscsw.org/applicants/registered-from-another-province/</a> Internationally educated applicants: <a href="http://nscsw.org/applicants/international-bswmsw/">http://nscsw.org/applicants/international-bswmsw/</a>	Documents indicated and communicated verbally  Level 2  List of required documents indicated on website  Process to verify document authenticity  Level 3  N/A		16(3)(b), 16(3)(e)
14b	Do you include a process for verification of documentation authenticity?	Yes  Transcripts must come directly from the University in a sealed, stamped envelope, criminal records check, and child abuse registry searches must be the original documents with the appropriate stamp and embossments. We will accept copies if the originals have been witnesses.  Reference letters must be sent directly from the referee.			
15	Do you provide information on the steps in the registration process including supporting documentation required at the various steps?	Yes  New Canadian applicants: http://nscsw.org/applicants/canadian-bswmsw/  CFTA transfers: http://nscsw.org/applicants/registered-from-another-province/  Internationally educated applicants: http://nscsw.org/applicants/international-bswmsw/	Level 1 General information Not broken into steps Level 2 Step by step process indicate where applicant needs to supply information Level 3 Step by step process indicate where applicant needs to supply information Pathway to licensure	Level 2	7(c), 16(3)(a), 16(3)(b)
16	Do you accept alternative information if required documents cannot be obtained for reasons beyond the applicant's control (i.e. a sworn statement in lieu of full documentation)?	Yes  If an applicant has not yet convocated with will accept an official letter from the University until their transcripts can be obtained.  If an applicant is applying from a Province that does not have a separate child abuse registry, we will accept a vulnerable sector search instead.	Level 1 Yes – on a case by case basis Level 2 Yes – examples documented Process not clearly laid out or documented Level 3 Yes – process clearly documented	Level 1	9(b), 16(3)(c)
17	What difficulties or obstacles are faced by applicants who	Obtaining original documents, verification of credentials	N/A	N/A	6, 9(b), 16(3)(c)

	received their qualifications in a country other than Canada?	Applicants are required to have their credentials assessed by the CASW.			
18a	Do you have a process for which requests for access documentation related to registrations are considered?	Yes  What is the NSCSW policy on returning original documents? The NSCSW can witness and return your criminal record check and child abuse registry search.  Transcripts received from universities become property of the NSCSW.  http://nscsw.org/news-events/faqs/	Level 1 Not documented  Level 2 Documented  Level 3 Documented and made available to applicants		12, 16(3)(j)
18b	Is this made available to applicants?	Yes			
18c	What information may you exclude?	On our website: <a href="http://nscsw.org/news-events/fags/">http://nscsw.org/news-events/fags/</a> Documents in an applicant's file are submitted by the applicant themselves, therefore, they should already have all documents relevant to their application. Reasons for decisions, if the applicant is not registered, is made available to them via email. If the applicant requires copies of certain documents, such as their CRC and CAR check, these can be requested via email, phone or fax, and it will be sent to them.			
18d	Do you charge a fee?	No			
19	Does your Act include an authority to conduct an internal review of the registration decision?	Refusal to register 25 (1) Notwithstanding Sections 22, 22A and 23, the Board may refuse to register, upon investigation by the Registrar, an applicant who, in the opinion of the Board, (a) has obtained or attempted to obtain registration pursuant to this Act by fraud or misrepresentation; (b) has violated the Code of Ethics; (c) has been convicted of an offence pursuant to this Act; (d) has been found guilty of conduct that is, in the opinion of the Board, conduct unbecoming of a registered social worker or registered social worker candidate; (e) displays incompetence in the practice of social work; or (f) has failed to renew registration through non-payment of the prescribed fees. (2) The Board shall inform the applicant, in writing, of its refusal to register the applicant. (3) An applicant who has been refused registration may apply to the Board, within thirty days from the date of written receipt of the refusal, for a review by the Board of its decision, by providing to the Registrar a notice in writing indicating the grounds for the review. (4) The Board shall, in every review	Level 1 N/A Level 2 N/A Level 3 Yes	Level 3	7(a)

20	Do you have a regulation or by-law that defines the internal review process?	hearing, give an opportunity to the applicant to be heard, to present evidence and to make representation. (5) The Board shall confirm or vary the decision reviewed and shall give reasons for its decision. 1993, c. 12, s. 25; 2001, c. 19, s. 8.  Yes  Our regulations, Section 13 (1) - 15, outline our registration appeal process, found on our website here:	Level 1 N/A Level 2 N/A	Level 3	7(a), 10
21	When are unsuccessful candidates informed of	http://nscsw.org/applicants/registration-appeal/  Included with a registration decision	Level 3 Yes  Level 1 No specific timeline	Level 3	7(a),
	their right to internal review of the registration decision?	Applicants, successful and unsuccessful are notified of their registration status within 1 business day of a decision.	No specific timeline  Level 2  Specific timeline  Not documented  Level 3  Specific timeline  Documented and communicated		10(1)
22a	Do you have an internal review process and procedures document (policy document)?	Yes  We have an appeals process found in our Act, regulations and application and policy manual. Also, the process is outlines on our website: <a href="http://nscsw.org/applicants/registration-appeal/">http://nscsw.org/applicants/registration-appeal/</a>	Level 1 Yes Not documented Level 2 Yes Documented Level 3 Yes	Level 2	7(a), 10(1)
22b	Does this include time frames for the internal review?	The applicant may apply to the Board of Examiners within 30 days from the date of written receipt of the refusal. Following receipt of the written request of appeal, within 60 days the Registration Appeal Committee will determine the manner in which the review will be conducted. At the conclusion of the review process, the Registration Appeal Committee shall make its decision within a reasonable time and shall render a written decision with its reasons within a reasonable time.	Documented and available to applicant		
23a	With regards to the internal review process you make available to applicants that are not granted registration: summarize the process of the internal review.	If the Board of Examiners refuses to issue a certificate of registration to you, the Executive Director/ Registrar will inform you of this decision in writing. At this time you will be informed that you may request a review of the decision. You can appeal	Level 1 Not documented Level 2 Documented Level 3	Level 3	7(a), 10, 16(3)(m)

this decision within 30 days from the date of written receipt of the refusal.

If you request a review, the review will be

conducted by a Registration Appeals

Documented and made available to applicant

### The Review Process

Committee.

The applicant may apply to the Board of Examiners within 30 days from the date of written receipt of the refusal, for review of its decision, by providing to the Registrar a request in writing that indicates the grounds for the review. The Registrar will directly forward the applicant's request for review to the Registration Appeal Committee.

Following receipt of the written request of appeal, within 60 days the Registration Appeal Committee will determine the manner in which the review will be conducted. This may include:

- Hearing of the matter, where both parties have the opportunity to present evidence and to make oral submission.
- 2. Review of the written record together with written or oral submissions from the parties, as determined by the Registration Appeal Committee.
- 3. Such other procedure as the Registration Appeal Committee may determine.

In a review before the Registration Appeal Committee, the parties are the applicant and the College (through a representative appointed by the Executive Director/ Registrar). The Registration Appeal Committee may determine its own procedure and may:

- a. Adjourn or postpone a proceeding from time to time.
- b. Amend or permit the amendment of any document filed in connection with the proceedings.
- c. Determine where a hearing is held.
- d. Order pre-hearing procedures, including pre-hearing conferences that are held in private, and direct the times,

NSCSW FRPA Progress Report

23c	Specify the format for	proceed with the review in any event.  Oral, written
		the identity of the witnesses. (2) Notwithstanding Section 15(1), the Registration Appeal Committee may, in its discretion, allow the introduction of evidence that would be otherwise inadmissible and may make directions it considers necessary to ensure that the party is not prejudiced. (3) Where the Registration Appeal Committee has determined to hold a hearing, and the applicant fails to attend the hearing, the Registration Appeal Committee may
		an opportunity to examine the evidence; b. in the case of evidence of an expert, a copy of the expert's written report or if there is no written report, a written summary of the evidence and the qualifications of the expert; or c. where the Registration Appeal Committee authorizes the attendance of witnesses,
23b	Describe the opportunities made available to an applicant to make submissions respecting such review.	Evidence 15. (1) The following evidence is not admissible at a Registration Appeal Committee review process unless the opposing party has been given at least 10 days; notice before the review: a. in the case of written or documentary evidence,
		The decision of the Registration Appeal Committee is final.
		At the conclusion of the review process, the Registration Appeal Committee shall make its decision within a reasonable time and shall render a written decision with its reasons within a reasonable time.
		g. Receive and accept such evidence and information on oath, affidavit or otherwise as the Registration Appeal Committee in its discretion sees fit, whether admissible in a court of law or not.
		f. Administer oaths and affirmations.
		e. Order that a hearing, parts of a hearing or pre-hearing conference be conducted using a means of telecommunication that permits the parties and the committee to communicate simultaneously.
		dates and places of the hearing for those procedures.

23d 23e	What is the timeline for submitted supporting evidence?  Do you believe this is enough time to receive supporting evidence from outside Canada?	at least 10 days prior to the review, within the regulations the review committee has the authority to extend the submission deadlines based on the context  Yes  within the regulations the review committee has the authority to extend the submission deadlines based on the context.			
24a 24b	Are the results of the internal review made available to applicants in writing with reasons? In what timeframe are the results of the internal review made	Yes  1-2 months	Level 1 Yes Level 2 Yes Specific timeline	Level 2	7(a), 10(3)
24c	available to applicants?  Are these timelines communicated?	Yes  They can be found in our regulations.	Level 3 Yes Specific timeline and communicated		
25	Have individuals who make internal review decisions received appropriate training?	Yes, they are provided with an orientation to the Regulations.	N/A	N/A	7(a), 11, 16(3)(p)
26	Do you have a prohibition that states that 'no one who acted as a decision-maker in respect of a registration decision acted as a decision-maker in an internal review?	Section 13(1)(b) of the Regulations states the committee shall be made up of at least one public member and no less than two Registered Social Workers who are in good standing and who were not part of the registration review process.	Level 1 N/A Level 2 N/A Level 3 Yes	Level 3	7(a), 10(5), 16(3)(n)
27	Do you have any international agreements (i.e. reciprocal recognition) endorsed by your regulatory body or national organization?	No	N/A	N/A	7
28	Has your organization experienced any unintended consequences— defined as an unintended negative impact on labour market, economic, social or other condition—arising as a result of the implementation of Chapter 7 of the	No	N/A	N/A	3

	Agreement on Internal Trade?				
29	Does your legislation and/or regulations include labour mobility provisions (i.e. the ability to accept applicants already certified in another Canadian jurisdiction regardless of the requirements in the previous jurisdiction?	Yes  Social Workers Act Section 22(2)(c)	N/A	N/A	Chapter 7, CFTA
30	Do you review the requirements of the other provincial regulatory bodies regularly?	Yes  The ED/R meets with other social worker regulators and American Social work regulators 4 times per year.	N/A	N/A	3, Chapter 7, CFTA
31a	Has your organization made any changes to the occupational standards in your legislation, regulations and/or by-laws (i.e. entry to practice standards, continuing education requirements, codes of ethics) within the last two years?	No	N/A	N/A	
31b	If yes, did you work with the Labour Mobility Coordinator or a Provincial Government representative to complete an AIT notification (i.e. notification form sent prior to approval that informs other Canadian jurisdictions of the proposed change)?	N/A	N/A	N/A	

# Action Plan

In accordance with the *Fair Registration Practices Act*, the FRPA Action Plan outlines the measures that the NSCSW has agreed to work towards.

# **Non-Compliance Issues**

The actions listed in this section address registration practices that currently contravene the FRPA. Relevant sections of the Act are referenced with each action. NSCSW will address these priority items in the short-term with report back to the FRPA Review Office on completion of each action.

#	Action	Questionnaire Reference	FRPA Reference	Plan for Completion
1	• Documentation of qualifications: a description of what alternative information may be supplied by an applicant who cannot obtain documentation for reasons beyond the applicant's control (such as a transcript, letter from the university, etc.). Make this information available to applicants. See sample policy on the FRPA website: Accepting Alternative Information to Required Documentation. Carry-over from 2017 Action Plan.	16	9(b), 16(3)(c)	<ol> <li>Will assess what policy development is required based on FRPA's rationale (Winter 2020)</li> <li>Will develop policy (Spring 2020)</li> <li>Will pass policy and build into website (Fall 2020)</li> </ol>
2	• Access to Records: a description of the process under which requests for access to records are considered. Policy could identify documents that can be obtained online, copies of any original documents, decisions pertaining to the file, fees associated with the access request. See sample policy on the FRPA website: Access to Applicant's Records.  Carry-over from 2017 Action Plan	18	12, 16(3)(j)	<ol> <li>Will assess what policy development is required based on FRPA's rationale (Winter 2020)</li> <li>Will develop policy (Spring 2020)</li> <li>Will Pass policy and build into website (Fall 2020)</li> </ol>
3	Develop a streamlined process for applicants already registered in another Canadian jurisdiction. This process may not include the reassessment of the applicant's original credentials.	7	3	<ol> <li>LOE information already placed on website</li> <li>Develop a process to implement the LOE as it is currently written (Winter 2020)</li> </ol>

<ul> <li>Post correct information to the website about the Legitimate Objective Exception (LOE).</li> <li>Implement process for assessing applicants in accordance with the LOE as posted.</li> <li>Work with Labour Mobility Coordinator to review the LOE.</li> </ul>	<ol> <li>Develop a compliant process for CFTA applicants not affected by LOE (Winter 2020)</li> <li>Will consult with Colleges Lawyers in regards to LOE and Act and assess best process (winter 2020)</li> <li>Work with Labour Mobility Coordinator to review and update the LOE to reflect current needs. (Spring 2020)</li> </ol>

# **Required Improvements**

The actions listed in this section address registration practices that meet a minimum level of compliance with the FRPA. These actions focus on areas for improvement. NSCSW will address these actions over the next two years.

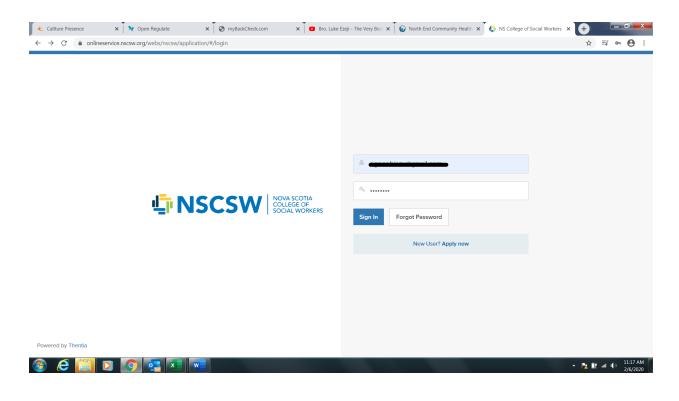
#	Action	Questionnaire Reference	FRPA Reference	Plan for Completion
1	<ul> <li>Provision of information by regulating bodies: Clarify criteria pertaining to the experience requirement for registration and make available to applicants.</li> </ul>	3 & 5	7(a), (c), (d), 16(3)(a), (b)	Completed January 2020 was placed on website.
2	<ul> <li>Communicating with applicants: Develop a policy on registration decisions which includes:         <ul> <li>Where registration is not granted, provide written decisions that include reasons to applicants</li> <li>Include a timeline for decision-making</li> <li>Append the internal review policy to denial letters</li> <li>Information respecting</li> </ul> </li> </ul>	11, 12, 13	7(b), 8(a), (b), (c), (d), 10	Communicating applicants: Develop a policy on registration decisions which includes:  - Where registration is not granted, provide written decisions that include reasons to applicants  - Include a timeline for decision-making  - Append the internal review policy to denial letters  1. Board of Examiners will review current policy (Winter 2020)  2. Board of Examiners will update policy (spring 2020)

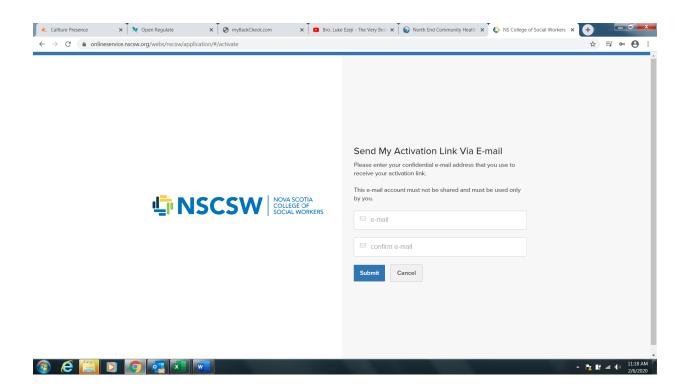
	measures or programs that may be available to assist unsuccessful applicants in obtaining registration at a later date.			3. Board of Examiner will Approve new policy (Fall 2020) 4. Update policy manual and website (Fall 2020)  Timeline for information respecting measures or programs that may be available to assist unsuccessful applicants in obtaining registration at a later date is unknown. It will be contingent on success of Pathways to Social Work Program and capacity to operationalize
3	Provision of information: Create a visual pathway (flow chart) to licensure to describe the steps to licensure, indicating where documents must be submitted. Ensure that this process is adapted for all streams of applicants.	15	7(c), 16(3)(a), (b)	<ol> <li>Will Assess current visual pathway against recommended pathway design suggested by FRPA (Winter 2020)</li> <li>Will determine if changes are required to current visual pathway (Winter 2020)</li> <li>Will update webpage (Summer 2020)</li> </ol>
4	<ul> <li>Internal Review         Process: Additions to             the policy:         Timeline for             decision-making         Clarify recipient of             the decision.     </li> </ul>	22 & 24	7(a), 10(1), (3)	<ol> <li>Reviewed in winter 2020</li> <li>Updated spring (2020)</li> <li>Implemented spring (2020)</li> </ol>

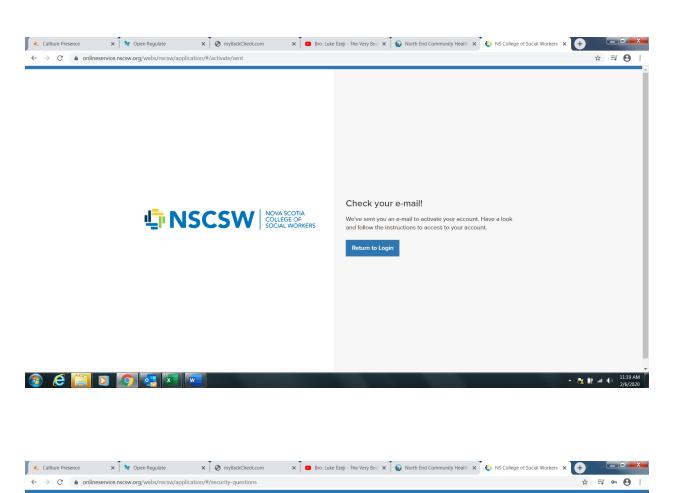
# Disclaimer

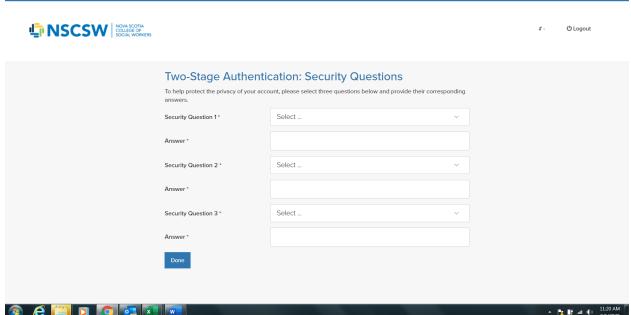
The Nova Scotia College of Social Workers (NSCSW) hereby declares that the information contained in this report is a true and accurate representation of current registration practices of their organization.					
Ale Dridfall	February, 24th 2020				
Registrar	Date				

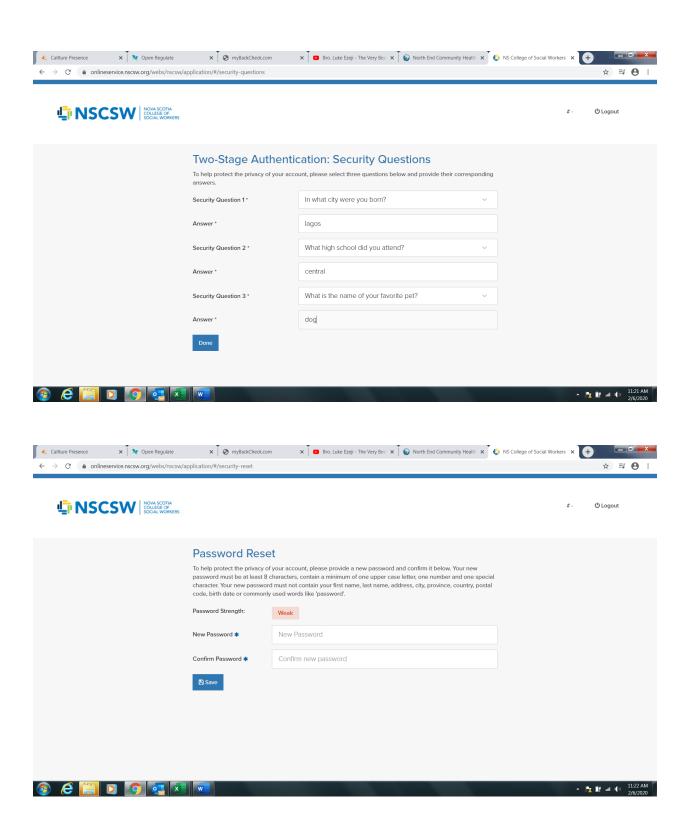
# **Appendix**

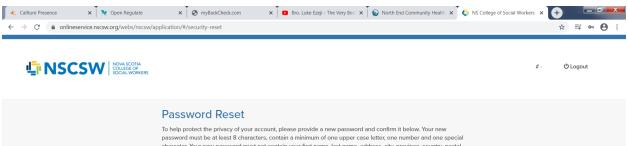


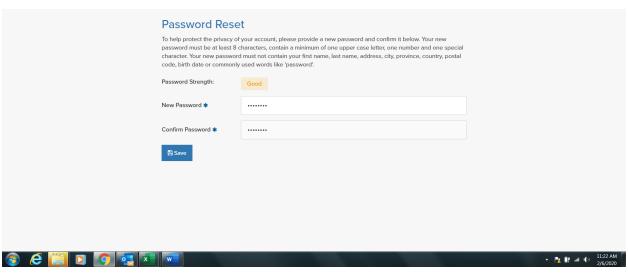


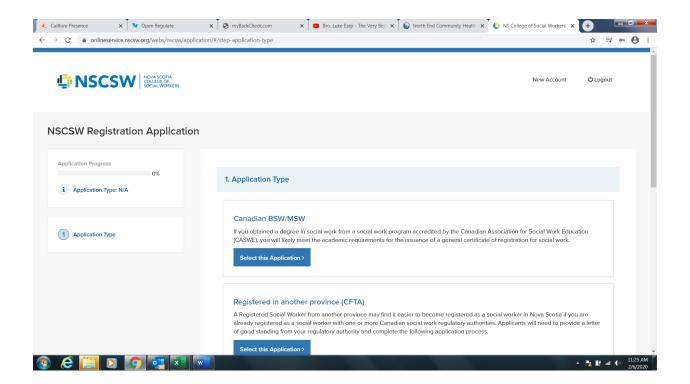


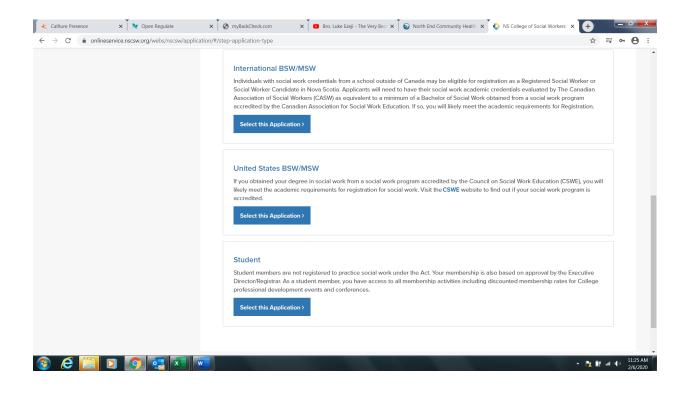


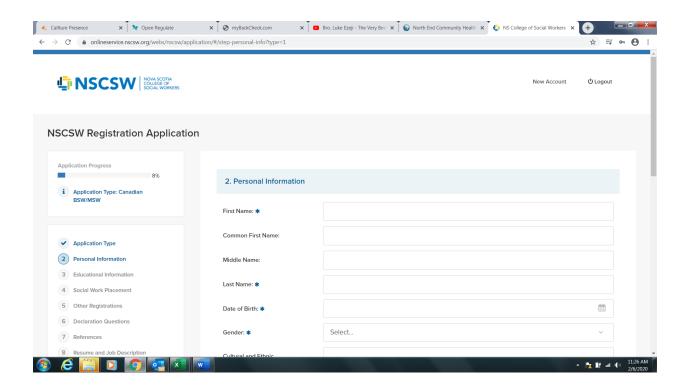


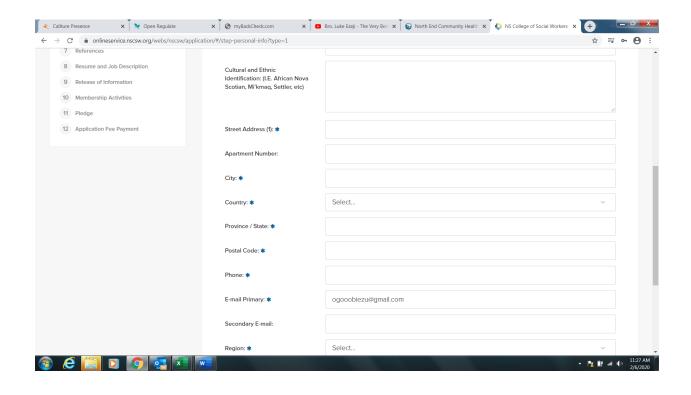


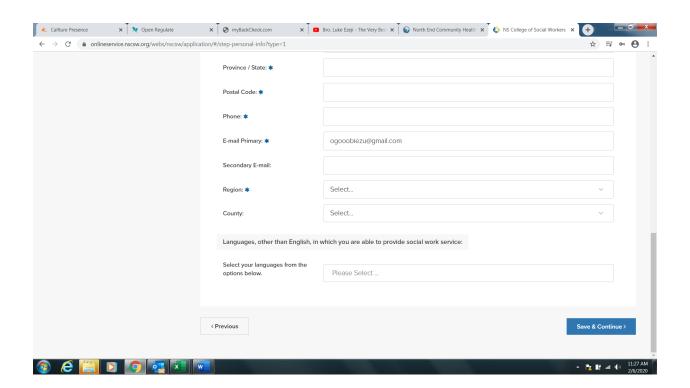


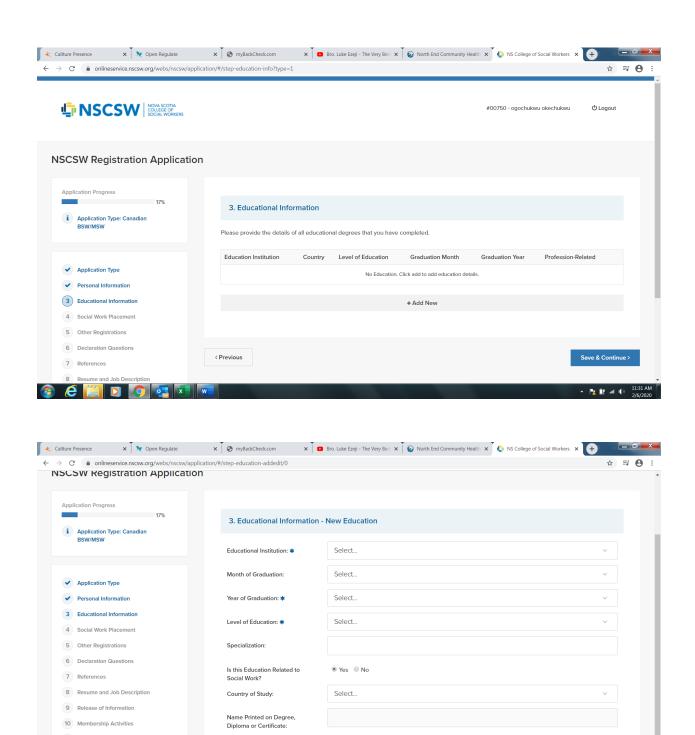












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