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Social Workers and
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ADDITIONAL SUBMISSION

TO THE MINISTRY OF COMMUNITY AND SOCIAL SERVICES

REVIEW OF THE

SOCIAL WORK AND SOCIAL SERVICE WORK ACT, 1998

MADE BY:

**ONTARIO COLLEGE OF SOCIAL WORKERS AND SOCIAL SERVICE
WORKERS**

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INTRODUCTION

The College, together with other stakeholders, has been provided with an opportunity to provide comments on the Ministry's synopsis (Ministry Synopsis) of the issues raised by the submissions made in connection with the review of the *Social Work and Social Service Work Act, 1998* (Act).

While there are other issues which require the College's comment, the purpose of this additional written submission is to provide the College's comments on three key issues identified in the Ministry Synopsis: effectiveness of the title protection regime of the Act, deregulation of social service workers, and governance structure of the College.

Please note that in order to respect the Ministry's request that the Ministry Synopsis not be published, the College has omitted its specific comments on the Ministry Synopsis from this version of the College's additional written submission.

THREE KEY ISSUES RESPECTING THE REVIEW

1. Effectiveness of the Title Protection Provisions of the Act

(a) Background

By way of background, it is important to keep in mind the legislative intent with respect to the regulation of the two professions of social work and social service work. In this regard, it is helpful to return to the comments that were made during the legislative process with respect to Bill 76, an Act to Establish the Ontario College of Social Workers and Social Service Workers. The following statement was made by Frank Klees, the then Minister's parliamentary assistant, in connection with second reading of the Bill on December 8, 1998:

"This proposed legislation is an important addition to the social policy framework of this province. It will grant formal recognition to professions that are critical to the delivery of a variety of human service programs, and it will ensure public safety and quality services.

Social workers and social service workers play critical roles in the delivery of a wide range of important services in the social, health, educational and correctional services sectors in this province. Thousands of vulnerable adults and children receive services from social workers and social service workers every year in this province. This is important and sensitive work with far-reaching consequences for individuals, for families and for our society.

Despite the important contribution of these professions to Ontario, social workers and social service workers do not currently enjoy formal recognition. In the absence of that recognition, neither this government nor the public can be assured that the services provided by members of the profession are in fact of the highest ethical and quality standards. In fact, it's possible today for an individual to hang up his or her shingle as a social worker or social service worker and set up shop providing counselling to people about sensitive personal issues. Such a person may be eminently qualified and provide valuable and important service, or he or she may not. The fact is that the public has no way of finding out.

We felt this was unacceptable. The work done by social workers and social service workers involves much more than just common sense. These professions are based on a body of expert knowledge that has been built up over many years, although I might say that it certainly does include a great deal of common sense. Clients need to know that the practitioner they are dealing with is fully qualified in that body of

knowledge and is entirely familiar with professional techniques and practices.

Until now, Ontario has been the only province in Canada not to have legislation covering the social work profession. As I indicated at first reading, the proposed Social Work and Social Service Work Act fills a void that has existed in Ontario for so many years. By creating a regulatory college for social workers and social service workers, Bill 76 will achieve two key objectives. First, it will put in place the safeguards necessary to ensure public safety and high quality standards on the part of the practitioners; and second, it will extend formal recognition to these important professions."

In the College's opinion, these statements remain true today. Therefore, from the College's perspective, one of the key issues to address in connection with the review of the Act is whether the scheme of the Act, which is only a "title protection" act, is effective in carrying out the objective of the Act - to "ensure public safety and quality services".

(b) Ministry Synopsis

(Intentionally deleted.)

(c) Is a Title Protection Regime Adequate to Ensure Public Safety and Quality Service?

The College's view is that the Act cannot accomplish the key objective of ensuring public safety and quality services if there are practitioners who have the academic qualifications of a social worker or social service worker and who provide services to members of the public within the scope of practice of the professions but are not regulated by the College.

As stated in the College's March 15, 2005 submission (College's original submission), the College has observed and been advised of a number of circumstances where employers, including government agencies and organizations that are funded by the government, advertise a position as requiring the academic qualifications of a social worker or social service worker or that candidates for the position be eligible for registration with the College, but use a title for the position other than "social worker" or "social service worker", thereby appearing to avoid being in breach of the title protection provisions of the Act. Some employers have simply

changed the job titles of their employees or reclassified positions as a method of avoiding their employees being required to be registered with the College.

Furthermore, the College has received a number of complaints about individuals who are not registered as members of the College but who the complainants believed were providing social work or social service work services. The complainants include members of the public and other members of the College. The College has also received mandatory reports where the person filing the mandatory report believed that the individual was a social worker or social service worker. Approximately 28% of the total number of complaints and mandatory reports filed with the College related to individuals who were not registered with the College. It is worth noting that the number of complaints that relate to non-members has been increasing. Attached as Schedule 1 is a chart setting out the number of complaints and mandatory reports filed against members and non-members since 2000.

Similar observations were stated, in a somewhat different way, by the Ontario Association of Social Workers in its submission as follows:

"3.1 Provision of Services to At-Risk Populations:

When the Social Work and Social Service Work Act was introduced by then Minister of Community and Social Services, the Honourable Janet Ecker, she linked this legislation to the Child and Family Services Act. The stated expectation at that time was that social work regulation would enhance public protection within the field of child welfare. As laudable as this intention was, the reality has been that contrary to this aim, following the enactment of the Social Work and Social Service Work Act, child welfare agencies across the province quickly moved to change job titles for positions traditionally held by social workers to the title "child protection". With the change in job title, "child protection" jobs then fell outside of regulatory legislation.

Additionally, the change in job titles has reduced the credibility of social work testimony within the courts since individuals with academic qualifications in social work, who are not registered with the College, cannot call themselves social workers or hold themselves out as social workers. No longer able to draw upon their academic preparation as a social worker, the weight of their testimony as an expert witness is seriously diminished. Most importantly, social work is the leading discipline for practice and scholarship in the child welfare field, and the scope of practice of social work encompasses the breadth of expertise

required to ensure child protection. This includes assessment, diagnosis, treatment and evaluation of individual, interpersonal and societal problems to achieve optimal psychosocial and social functioning for the child and his or her family (Fall/Winter 2004/05 Perspective, Zagdanski, 2004, p.10).

The practice of changing job titles in positions traditionally held by social workers has also occurred within other publicly funded agencies serving at-risk populations. These include the Office of the Children's Lawyer and community health clinics, as well as a variety of other settings such as children's mental health treatment centres. In effect, changing job titles has served to eliminate a mechanism of public protection afforded to the individuals and groups who receive services from other regulated professions.

Given the vital role that government plays in protecting at-risk children through child welfare organizations and the criminal justice system, tolerance of the practice of changing job titles sends a troubling message that the harms from abuse, neglect and family disruption are less significant than harms arising from a health condition or impairment, or that children and families who are disenfranchised do not need the same level of protection afforded other members of the public. It is inconceivable that other regulated professionals such as nurses, doctors, physiotherapists, lawyers or teachers would be permitted to provide services without membership in their professions' regulatory body. Indeed, the Child and Family Services Act exists to codify our responsibility as a society to ensure the well-being of children who are more vulnerable than adult members of society."

In the College's view, these observations and information indicate that a title protection regime on its own is not adequate to ensure public safety and quality services. Even with statutory scopes of practice and controlled acts (which is the regulatory framework under the *Regulated Health Professions Act*), successful enforcement or prosecution of unregistered practitioners has been problematic.¹ Therefore, the College believes that the Ministry should carefully consider how best to strengthen this regime.

(d) The College's submission

The College's original submission proposed that the Ministry consider a number of options to strengthen the title protection regime of the Act:

¹ Adjusting the Balance: A Review of the *Regulated Health Professions Act*, Report to the Minister of Health and Long-Term Care, Health Professions Regulatory Advisory Council, March 2001, page 114

1. that a scope of practice for social work and social service work be included in the Act;
2. that consideration be given to whether any restricted activities be authorized to social workers and social service workers;
3. that individuals who meet the qualifications to be registered and practise within the scope of practice of social workers or social service workers be held accountable;
4. that employers who employ persons who meet the qualifications to be registered and practise within the scope of practice of social workers and social service workers be held accountable.

A scope of practice is a statement that describes what a profession does, the methods used and the purpose for which it does it. Among other things, a scope of practice for each of the professions of social work and social service work would strengthen the title protection regime by providing a statutory reference for assessing whether a person is holding himself or herself out to be a social worker or social service worker.

Without a scope of practice for social work and social service work in the Act, there is no statutory framework for determining whether a person is representing or holding himself or herself out as a social worker or social service worker. Including a scope of practice for social work and social service work in the Act, would not turn the services described in that statement into controlled acts or restricted activities, but it would serve to better define the meaning of social work and social service work practice.

The College has adopted and published scopes of practice for each of the professions, which were attached as Appendix 1 to the College's original submission. The College's scope of practice statements for the professions of social work and social service work differ in a number of respects. The scope of practice for the profession of social work includes the term "diagnosis", while the scope of practice for the profession of social service work does not. The scope of practice for the profession of social work refers to the use of "social work knowledge, skills, interventions and strategies". The scope of practice for the profession of

social service work refers to the use of "social service work knowledge, skills and interventions and strategies". In the scope of practice for the profession of social work, the purpose of the assessment, diagnosis, treatment and evaluation is "to achieve optimum psychosocial and social functioning". In the scope of practice for the profession of social service work, the purpose of the assessment, treatment and evaluation is "to achieve optimum social functioning".

The College's analysis of the regulatory framework in Alberta under the *Health Professions Act* needs to be examined by the Ministry more closely. The regulatory framework in Alberta under the *Health Professions Act* has a number of elements to it:

1. A scope of practice;
2. A requirement for a person to be registered if
 - (a) the person qualifies for registration as a social worker; and
 - (b) intends to
 - (i) provide services within the scope of social work practice directly to the public;
 - (ii) supervise regulated members who provide social work services to the public; or
 - (iii) teach in a social work education program; and
3. A requirement that an employer not knowingly employ an unregistered person, who meets the qualifications to become registered as a social worker, to provide the services described above (that is, services within the scope of social work practice directly to the public, supervision of regulated members who provide social work services to the public, or teaching in a social work education program).

The Alberta regulatory framework does not appear to require that all employed persons with social work or social service work education/training register with the Alberta

regulatory body. The Alberta regulatory framework does not appear to provide for mandatory registration of all employed persons with social work and social service work education/training. Rather, it appears to require that those persons who have the knowledge, skill and judgment acquired from a social work or social service work education and who provide services within the scope of social work practice directly to the public, or supervise those persons who do so, to register with the Alberta regulatory body. This legislative framework links social work education, providing services within the scope of social work practice and providing services directly to the public, and concludes that those are the individuals who should be required to be registered.

The College proposes that this legislative framework be considered. These additional elements would strengthen the title protection regime of the Act by requiring those individuals who have social work or social service work education and who provide services to the public within the scope of practice of social work or social service work to be registered. In the College's view, such additional elements would strengthen the enforceability of the Act and thus ensure public safety and quality services.

2. Deregulation of Social Service Work

(a) Background

At third reading of Bill 76, Janet Ecker, then Minister of Community and Social Services, made the following statement:

"As I mentioned, the legislation we're discussing today includes both professional groups: social workers and social service workers. The inclusion of social service workers in this legislation actually places Ontario in the forefront of Canadian provinces. Social service workers are not currently regulated anywhere else in Canada. The inclusion of social service workers recognizes the growing importance of their profession in Ontario. It also will expand very significantly the number of practitioners who will be subject to the proposed college's ethics code and practice standards.

"It's difficult to overestimate the importance of the social work and social service work professions in this province. They're among the professionals who deliver key services for Ontarians such as probation services, mental health services, services for people with developmental

handicaps, children's aid societies, hospitals, the education system, nursing homes, home support programs, addiction treatment programs – the list goes on and on. Increasingly in recent years, many social workers and social service workers have been entering private practice by offering their services to members of the public on a fee-for-service basis."

In the College's opinion, the role of and services delivered by social service workers have not fundamentally changed from the description in this statement. The services delivered by social service workers in Ontario cut across every strata of society and every developmental stage from birth to death. Therefore, in the interest of public safety and high quality standards of practice, the College emphatically supports the continued regulation of social service workers.

(b) Ministry Synopsis

(Intentionally deleted.)

(c) The College's Comments

First, the College offers a comment on the review process itself. The deregulation of one of the two professions governed by the Act would be a fundamental change to the Act. If the Ministry were prepared to consider such a fundamental issue, one would have expected that this issue would have been specifically raised in the review questions so that all persons potentially affected could have provided comments. In the College's view, without being raised as a specific review question, the deregulation of one of the two professions regulated by the Act is outside the scope of the review questions posed.

Secondly, the College believes that the membership of 1,000 registered social service workers is a significant achievement, taking into account various factors. Social service work is a newly regulated profession in Ontario and is not currently regulated in the other provinces of Canada. The title that is protected in the Act has not been an occupational designation. It originated as the designation of educational programs offered by colleges of applied arts and technology in Ontario. Where professional self-regulation is a new concept for a profession and the title protected by the legislation does not reflect an occupational title, it is to be expected that it will take time to build a membership base. In a relatively short period of time

(5 years), the number of social service work members is greater than the number of members of four health regulatory Colleges and not significantly less than the number of members of a fifth health regulatory College, all of which have been in existence for over ten years. As the social service work membership has grown year over year since 2000 and has increased by 178% between 2000 and 2005, the College is optimistic that the number of social service work members will continue to grow steadily.

Thirdly, with respect to the principal issue – that is, whether social service workers play critical roles in the delivery of important services which pose a risk of harm to vulnerable adults and children – based on information that the College has collected from its members, they do. Almost 60% of the social service work members of the College work in practice fields that suggest that they are working with vulnerable persons. These practice fields include medical/health care, child mental health, adult mental health, addictions, rehabilitation, disabilities, child welfare, family services, family violence, sexual abuse, income maintenance, criminal justice/corrections and employee assistance programs. In addition, a small number of social service workers work in private practice. Many of these practice fields can be considered complex, clinical contexts.

While organizational structures of public sector agencies and organizations contribute to public safety and may provide a mechanism for a member of the public to make a complaint, these structures do not provide for a neutral third party that will investigate a complaint. An individual may feel that the services he or she receives from the agency may be jeopardized if a complaint were to be filed and thus the individual may be hesitant to file a complaint. These structures also do not assess a complaint on the basis of the standards of practice of the profession but on the basis of the specific policies and practices of the organization. Although an employer can terminate an employee's employment for breaching the organization's policies and procedures, there is no system in place for others to become aware of the risk of harm posed by the employee.

One of the important functions of a regulatory College is to provide a neutral third party with whom a member of the public can file a complaint and to have the complaint investigated and assessed against the standards of practice of the profession. A regulatory

College protects the public by dealing with issues of professional misconduct, incompetence and incapacity. Since the College register provides information to the public about a member whose certificate of registration has been suspended or revoked, it serves as a mechanism for the public to have information about members or former members who may pose a risk of harm.

The regulation of a profession by a College is not only for the purpose of receiving and investigating complaints against its members and dealing with issues of professional misconduct, incompetence and incapacity. The role of a regulatory College is also to assure the quality of practice of the profession by establishing standards of practice of the profession, promoting quality assurance, and establishing qualifications for persons to be able to enter the practice of the profession and use the protected titles. While employers set policies and procedures which will contribute to public safety, employers do not develop and establish standards of practice for their employees (who may be members of a number of different regulated professions) nor do they require that their employees engage in activities to promote quality assurance. The role of a regulatory College in assuring the quality of practice of the profession is equally important as the complaints and disciplinary functions.

In the College's view, the criteria that were satisfied when the government's decision was made to regulate the profession of social service work continue to be met. These criteria include that a substantial risk of physical, emotional or mental harm to individual clients arises in the practice of the profession, that the members of the profession call upon a systematic body of knowledge in assessing, treating and serving their clients, that a practitioner must successfully complete a post-secondary program offered by a recognized educational institution for entry to practice and the profession's leadership has demonstrated that it will favour the public interest over the profession's self-interest. The College acknowledges that there is room to add to the College's membership base in the social service work profession. This is a process, however, that will take time. The process would also certainly be assisted were the government to strengthen the regulatory regime of the Act.

3. Governance Structure of the College

(a) Background

The Act provides that the College will be governed by a Council of 21 members – seven (7) social workers, seven (7) social service workers and seven (7) members appointed by the Lieutenant Governor in General (public members). As stated by then Minister Janet Ecker on third reading:

"The College will be governed by a 21-member council with equal representation from each of the two professions and the general public. I think it's a very important protection that members of the public would also be part of this council, as well as elected members of the professions."

(b) Ministry Synopsis

(Intentionally deleted.)

(c) College's Comments on the Four Options with respect to the Governance Structure of the College

(i) Relevant policy considerations

As indicated in the College's original submission, the College has registered approximately 10,000 social workers and 1,000 social service workers. While social workers represent about 91% of the College's current membership and revenue, there is ample room for the College's membership to grow, particularly with social service workers. The College expects continued growth in membership for both professions and, in particular, has taken and will continue to take steps to reach out to potential social service work members.

Separate and apart from the four options relating to the governance structure of the College, the College wishes to emphasize the importance of its recommendation that the Act be amended to add a provision that where one or more vacancies occur in the membership of the Council, the members remaining in office constitute the Council so long as their number is not fewer than a quorum. The College appreciates that the *Good Government Act, 2005* (Bill 190) includes this amendment to the Act. However, should Bill 190 or the schedule therein that contains this amendment not be enacted, the College wishes to emphasize the importance of this

change because of the interruption to Council business that has been caused by vacancies on Council. The most recent occurrence of this problem has impacted on the College's ability to participate effectively in this review process itself.

Two of the options – the deregulation of social service workers and the establishment of separate colleges for social workers and social service workers – represent a fundamental change to the Act, not just to the governance structure of the College. For the reasons described above under the issue regarding the deregulation of social service workers, the College strongly believes that both social workers and social service workers should be regulated. With respect to the option to establish two separate Colleges, the College strongly believes that, because of the similarities between the two professions, there is not a policy basis to support separate Colleges. These include similarities with respect to the educational preparation of both professions for entry to practice, the services provided to the members of the public by both professions and the clients served by social workers and social service workers. There would also be great difficulty, given the current number of social service work members, to provide the necessary financial support for a separate College for social service workers. The College also believes that the issue regarding College governance can be addressed within the context of one College.

Before commenting on the other two options with respect to the College's governance structure, the College wishes to set out some of the factors that should be considered in determining the size and composition of Council. In the College's view, the following are the relevant factors:

1. the mandate of the College is to serve and protect the public interest. While it is important that there be both geographical and sectoral representation, as well as public input, once a person has been elected or appointed to Council, the Council member's duty is to serve and protect the public interest, not to represent a specific geographic region or specific profession;
2. the College regulates two professions, which are equal in status;

3. there needs to be a sufficient number of Council members from each profession and the public so that each profession and the public are able to participate effectively in Council's deliberations and decisions;
4. the composition of Council should take into account that the number of College members from each profession is in flux and the proportion of social workers and social service workers can be expected to change;
5. the size of Council should not extend to a number that renders Council meetings cumbersome or significantly increases the cost to regulate the two professions; and
6. there must be a sufficient number of Council members from each of the two professions and the public so that the statutory committees can be properly constituted.

In the College's view, the governance structure of the College involves a consideration not only of the composition of Council (the board of directors of the College) but also the composition of the statutory committees set out in section 14(2) of the Act (statutory committees). It is through these committees - Executive Committee, Registration Appeals Committee, Complaints Committee, Discipline Committee and Fitness to Practise Committees - that the principal regulatory functions of the College are carried out. In this regard, a self-regulatory body is different from other organizations. The Council is not the only decision-making body of a regulatory College. The statutory committees have decision-making authority and, in fact, make the decisions that relate to registration, complaints, discipline and fitness to practise matters. Any option with respect to the governance structure of a regulatory College, including this College, must also consider the composition of the statutory committees.

(ii) Composition of Council

The Council of the College appreciates that there is currently an imbalance in the College membership as between social workers and social service workers and has seriously considered possible changes to the composition of Council through amendments to the Act. It considered whether an increase in the number of social work members elected to Council should

be made by: keeping the Council at 21 members, increasing the number of elected social work members, and decreasing the number of elected social service work members. In the Council's opinion, such a change in the composition of Council would run counter to a fundamental value of the College – equity and fairness between two equal professions. Council believes that such a change would discourage social service workers from joining the College at a point in the College's history when the College is making efforts to increase its social service work membership. Such a change would also not recognize the expected growth in social service work members of the College. It would also make it difficult to populate the statutory committees with social service work members.

The Council also considered whether an increase in the number of social work members elected to Council should be made by: increasing Council to 27 members, increasing the number of elected social work members and public members (the proportion of public members to remain at 1/3 of Council), and keeping the number of elected social service work members at 7. In the Council's opinion, this change would also not reflect equity and fairness between two equal professions. Furthermore, a Council of this size would result in increased costs both to the College and the government. It would also be more challenging to ensure effective Council debate and participation with a Council of this size.

After careful consideration of these options, the Council voted unanimously in support of the current composition of Council – seven elected social work members, seven elected social service work members and seven public members. Present at the Council meeting were six elected social work members, six elected social service work members and seven public members.

The College believes that the key factors to determine the composition of Council are as follows:

- the duty of each Council member is to serve and protect the public interest, not to represent a specific geographic region or profession.
- the two professions of social work and social service work, being equal in status, should have equal representation on Council.

- the public should have an effective voice on Council.

These factors reflect the role and values of the College – its duty to serve and protect the public interest, equity and fairness between two equal professions and the importance of effective public member participation.

The Council acknowledges that some stakeholders have expressed opposition to maintaining the current composition of the Council. However, the College is a young organization and, in the Council's view, its membership numbers and the proportion of members between the two professions can be expected to change. In the Council's view, at this juncture in the College's history, it is premature to consider a change in Council composition. In the Council's view, the current Council composition achieves an appropriate and delicate balance among the two professions and public member representation.

(iii) Composition of Statutory Committees

While the Council does not believe the composition of Council should change, the Council believes the College should be provided with more flexibility with respect to the composition of the statutory committees. Such flexibility could be used to address a number of the concerns that have been raised by other stakeholders in the context of the composition of the Council.

As stated in the College's original submission, section 14(2) of the Act requires that at least one-half of the members of each statutory committee be persons elected to the Council and that at least one-third of the members of each committee be public members. This means that 5/6 of the members of each statutory committee must be Council members. This requirement restricts the ability of the Council to appoint non-Council members of the College to the statutory committees. In addition, the requirement that at least one-third of the members of each statutory committee be public members has, in practical terms, required the College to keep its statutory committees at a relatively small size, taking into account that there is a limited number of committees on which seven public members are able to sit. As a result, the College is unable to involve its members in an effective way in the statutory committees. The College is

also unable to expand the size of its statutory committees or change the sectoral representation on statutory committees, without increasing the burden on Council members.

If the Act were amended to provide more flexibility with respect to the composition of the statutory committees, the College could involve non-Council members in the statutory committees and have more social work representation at the statutory committee level. This step could address some of the concerns that have been raised by other stakeholders in the review. Some stakeholders have expressed the view that there should be significant representation from specific practice sectors on committees such as the Complaints and Discipline Committees. Their concern could be addressed if the size of these committees could be increased. Additionally, some social workers have expressed the fear that social workers will not be judged by the members of the profession of social work but by members of the profession of social service work. This concern does not arise from the two professions having equal representation on Council but from the inflexibility in the composition of the statutory committees. This fear could be alleviated by expanding the size of the Discipline Committee. For example, if the Act were amended, then the by-laws could structure the Discipline Committee as a twelve member committee composed of six social workers (2 of whom are Council members), three social service workers (2 of whom are Council members), and three public members. This would provide a broader roster from which a panel to hear a discipline matter could be selected.

The College's proposal that the Act be amended to provide more flexibility with respect to the composition of the statutory committees is consistent with the by-law making authority of the Colleges under the *Regulated Health Professions Act*. The proposal is not intended to limit the input of public members on statutory committees. First, sections 14(2)(a) and 14(5) currently address this concern. Secondly, there are other regulatory mechanisms, such as those utilized under the *Regulated Health Professions Act*, that could be considered to ensure public member participation.

While the College does not recommend a change in the composition of Council, the College strongly urges the government to consider the changes being suggested by the College to the composition of statutory committees by doing the following:

- (a) that the composition of the statutory committees be determined by by-law, other than the requirements currently set out in sections 14(2)(a) and 14(2)(d); and
- (b) that section 14(5) be changed to require that at least one member of each panel be a public member.

In the Council's view, the governance structure of the College – through the statutory committees – could be changed to address the concerns of stakeholders regarding the imbalance in the College membership by providing flexibility to the composition of the committees that carry out the regulatory functions of the College.

CONCLUSION

Thank you for this opportunity to provide additional written submissions on the review questions posed by the Ministry. The College welcomes the opportunity to discuss the other issues in its original submission more fully with Ministry staff and others. This will ensure the Ministry has a full appreciation of the issues identified in the College's original submission. The College would be pleased to provide such further information as might assist the Ministry in completing the review and preparing a report.

SCHEDULE 1

COMPLAINTS AND MANDATORY REPORTS FILED WITH THE ONTARIO COLLEGE OF SOCIAL WORKERS AND SOCIAL SERVICE WORKERS (2000 – OCTOBER 11, 2005)

Year	# of Complaints	# of Non-Member Complaints
2000	14	6
2001	27	8
2002	37	7
2003	30	10
2004	62	19
2005 (As of October 11/05)	35	12

Year	# of Mandatory Reports	# of Non-Member Mandatory Reports
2000	3	1
2001	4	1
2002	3	0
2003	8	0
2004	10	1
2005 (As of October 11/05)	8	0