



## **REGISTRATION PRACTICES ASSESSMENT REPORT — *The Royal College of Dental Surgeons of Ontario (RCDSO)***

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The Office of the Fairness Commissioner is an arm's-length agency of the Ontario government, established under the Fair Access to Regulated Professions and Compulsory Trades Act, 2006. Its mandate is to ensure that certain regulated professions have registration practices that are transparent, objective, impartial and fair.

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## AVAILABILITY OF REPORT

This report is provided by the OFC to the regulatory body assessed. The OFC will, upon request, release the report to other parties. The OFC will also post a summary of the report on its website. In the interest of transparency and accountability, the OFC encourages regulatory bodies to provide the detailed report to its staff, council members, the public, and other interested parties.

## INTRODUCTION

Assessment is one of the Fairness Commissioner's mandated roles under the [Regulated Health Professions Act, 1991 \(RHPA\)](#).

### ASSESSMENT CYCLE

To hold regulatory bodies accountable for continuous improvement, the OFC assesses their licensing practices using a two-year [assessment cycle](#).

Assessment cycles alternate between **full assessments** and **targeted assessments**:

- Full assessments address all specific and general duties described in the RHPA.
- Targeted assessments focus on the areas where the OFC made recommendations in the previous full assessment.

This approach establishes continuity between the assessment cycles.

### FOCUS OF THIS ASSESSMENT AND REPORT

The targeted assessment of this regulatory body focused on the areas where the OFC made recommendations in the previous full assessment.

The OFC's detailed report captures the results of the targeted assessment. The assessment summary provides the following key information from the detailed report:

- duties that were assessed
- an overview of comments related to the general duty
- commendable practices
- recommendations

## ASSESSMENT SUMMARY

### GENERAL DUTY

#### Assessment Method

The regulatory body selected one of the following three methods for the assessing of its adherence to the general-duty principles, and informed the OFC:

- a. OFC assesses based on the practices listed in the assessment guide
- b. Regulatory body self-assesses based on the practices in the assessment guide
- c. Regulatory body self-assesses using a system-based approach, in which it explains what it does to ensure that its practices are adhering to the general-duty principles

#### Principles assessed

As a result of the recommendations made in the full assessment, the regulatory body has been assessed on the principle(s) marked below:

- Transparency
- Objectivity
- Impartiality
- Fairness

#### Comments

The OFC found that since the last assessment, the Royal College of Dental Surgeons of Ontario (RCDSO) has demonstrated all general-duty practices related to transparency.

#### COMMENDABLE PRACTICES

A *commendable practice* is a program, activity or strategy that goes beyond the minimum standards set by the OFC assessment guides, considering the regulatory body's resources and profession-specific

context. Commendable practices may or may not have potential for transferability to another regulatory body.

The regulatory body is demonstrating commendable practices in the following areas.

## Transparency

- ensuring that policies and criteria are readily available to staff and decision-makers through several instructional binders, including the RCDSO's *Registration Membership Policy Manual* and *Registration How-to Guide*. The binders:
  - contain easy-to-understand resources for staff and decision-makers who are involved in registration. For example, the how-to guide contains many plain-language procedures, instructions and policies on how to deal with day-to-day problems and questions that staff may encounter.
  - provide detailed explanations about processes and documentation used in international jurisdictions
  - are quickly updated to ensure that they are consistent and accurately describe policies and procedures
- ensuring that all staff members are informed electronically about upcoming changes to registration information
- in 2013, asking the Professional Standards Authority (PSA) in the United Kingdom to review the RCDSO's performance as a regulator against the PSA's Standards of Good Regulation. The PSA issued a report on the RCDSO's performance, which the RCDSO published on its website. The review was an independent assessment of how the RCDSO was performing compared to regulators in other countries. This proactive approach to external assessment of its governance and processes demonstrates the RCDSO's openness towards ensuring public accountability.
- providing, in its registration information, a detailed explanation about its conduct requirement. The explanation:
  - informs applicants that they will be asked for information and documentation about past and present conduct
  - includes examples, processes and rationales for the types of information requested and helps applicants to better prepare to show that they meet this requirement
- creating a new dedicated section on the RCDSO website, called "How is Training Completed Outside of Canada Assessed?" This section explains:
  - the roles of the RCDSO and its third parties – the Commission on Dental Accreditation of Canada and the National Dental Examining Board of Canada – in the assessment process
    - global differences in dental training
    - competency standards used in curriculum development, standard setting, exam development, and assessment procedures
    - immigration matters and pathways to registration that are commonly asked about

The RCDSO has provided these explanations as a result of increased feedback from individuals who need more information about the assessment processes. RCDSO plans to further develop this section to make it easier to access particular topics.

- in 2012, reviewing registration information on the RCDSO website, revising and improving the information, and redesigning the website. The improved website includes clearer information for applicants, and is more accessible and user-friendly.

## **RECOMMENDATIONS**

The OFC has not made any recommendations for this assessment period.

The OFC expects that the RCDSO will continue maintaining its standards in the future.

In the spirit of continuous improvement, the OFC encourages the RCDSO to continue its efforts towards more transparent, objective, impartial and fair registration process.

## **ASSESSMENT HISTORY**

In the previous assessment, the OFC identified three recommendations for this regulatory body.

They have all been implemented.

# DETAILED REPORT<sup>1</sup>

## GENERAL DUTY

Legislation: RHPA, Schedule 2, S.22.2 The College has a duty to provide registration practices that are transparent, objective, impartial and fair.

### Transparency:

A process is transparent if it is conducted in such a way that it is easy to see what actions are being taken to complete the process, why these actions are taken, and what results from these actions. In the regulatory context, transparency of the registration process encompasses the following:

- Openness: having measures and structures in place that make it easy to see how the registration process operates
- Access: making registration information easily available
- Clarity: ensuring that information used to communicate about registration is complete, accurate and easy to understand

### Assessment Comments:

The Royal College of Dental Surgeons of Ontario (RCDSO) demonstrates all aspects of transparency.

#### Openness:

The RCDSO uses effective strategies to ensure the following:

- registration policies and criteria are readily available to registration staff and decision-makers
- policies and criteria are regularly reviewed and updated
- all registration staff and decision-makers who are responsible for implementing policies and criteria are promptly informed of changes to policy.

The RCDSO takes adequate steps to ensure that applicants can see that the documented policies have been followed in their case.

#### Access:

The RCDSO takes measures to ensure that applicants have all relevant information at the time and in the way needed to take actions appropriate to their individual circumstances including information about fees, timelines and steps an applicant can take in the registration process from outside of Canada. The RCDSO provides applicants with information about the role and the requirements of the third parties with whom applicants come into contact during the registration process.

#### Clarity

The RCDSO communicates well with applicants throughout the registration process. There are processes to communicate with applicants about their application before, during and after application. The RCDSO takes measures to ensure that applicants know how their application progresses and understand the reasons for all decisions taken during the registration process.

<sup>1</sup> Please note: Suggestions for continuous improvement appear only in the detailed report. Suggestions for improvement are not intended to be recommendations for action to demonstrate a practice, but are made solely to provide suggestions for areas that a regulatory body may consider improving in the future.

**Commendable practices:**

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# BACKGROUND

## ASSESSMENT METHODS

Assessments are based on the [Registration Practices Assessment Guide – For Health Regulatory Colleges](#). The guide presents registration practices relating to the specific duties and general duty in the RHPA.

A regulatory body's practices can be measured against the RHPA's specific duties in a straightforward way. However, the general duty is broad, and the principles it mentions (transparency, objectivity, impartiality and fairness) are not defined in the legislation.

As a result, the specific-duty and general-duty obligations are assessed differently (see the [Strategy for Continuous Improvement of Registration Practices](#)).

### Specific Duties

The OFC can clearly determine whether a regulatory body demonstrates the specific-duty practices in the assessment guide. Therefore, for each specific-duty practice, the OFC provides one of the following assessment outcomes:

- Demonstrated – all required elements of the practice are present or addressed
- Partially Demonstrated – some but not all required elements are present or addressed
- Not Demonstrated – none of the required elements are present or addressed
- Not Applicable – this practice does not apply to this regulatory body

### General Duty

Because there are many ways that a regulatory body can demonstrate that its practices, overall, are meeting the principles of the general duty, the OFC makes assessment *comments* for the general duty, rather than identifying assessment outcomes. For the same reason, assessment comments are made by principle, rather than by practice.

For information about the OFC's interpretations of the general-duty principles and the practices that the OFC uses as a guideline for assessment, see the [Registration Practices Assessment Guide – For Health Regulatory Colleges](#).

## Commendable Practices and Recommendations

Where applicable, the OFC identifies commendable practices or recommendations for improvement related to the specific duties and general duty.

## Sources

Assessment outcomes, comments, and commendable practices and recommendations are based on information provided by the regulatory body. The OFC relies on the accuracy of this information to produce the assessment report. The OFC compiles registration information from sources such as the following:

- Fair Registration Practices Reports, audits, Entry-to-Practice Review Reports, annual meetings
- the regulatory body's:
  - website
  - policies, procedures, guidelines and related documentation templates for communication with applicants
  - regulations and bylaws
  - internal auditing and reporting mechanisms
  - third-party agreements and related monitoring or reporting documentation
  - qualifications assessments and related documentation
- targeted questions/requests for evidence that the regulatory body demonstrates a practice or principle

For more information about the assessment cycle, assessment process, and legislative obligations, see the [Strategy for Continuous Improvement of Registration Practices](#).