

## BRIEFING NOTE

**TO:** Board of Directors

**FROM:** Derick Summers, Chair, Registration Committee

**DATE:** December 1, 2025

**SUBJECT:** **Photograph Submission Requirements Policy**  
**Appendix A:** Photograph Submission Requirements Policy (Current & marked with changes version)  
**Appendix B:** Photograph Submission Requirements Policy (Clean & proposed updated version)

☒ For Decision

☐ For Information

☐ Monitoring Report

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### Purpose:

To consider approval of proposed updates to the Photograph Submission Requirements policy, following a scheduled content review by the Registration Committee.

### Background:

The Registration Committee carries out a regular review of all public-facing policies to ensure they remain accurate, relevant, and aligned with the College's current processes. The following policy is being brought forward to the Board following a scheduled content review by the Committee.

Amendments to the College of Opticians of Ontario's (the "College") [Registration Regulation](#) came into effect on July 1, 2024, and the new regulation moved the photo requirement from regulation into by-law. The previous regulation specified that applicants needed to submit "two passport-sized colour photographs" and a new photo was required every 5 years at registration renewal. With the regulation change, a provision was added to the by-laws that require registrants to submit a photo in the form and manner set out by the Registrar at least once every 5 years. This change gives the College flexibility over the type of photograph and the timing of the submission, including the ability to require a new photo sooner than every 5 years.

### For Consideration:

The current policy with visible tracked changes is attached as Appendix A and the proposed clean version of the policy is attached as Appendix B so that the Board can view what edits are being proposed.

During this policy review, the proposed language change of the Photograph Submission Requirements policy is for clarity and to provide consistency across all College materials and communication. The proposed changes also now includes information as to what is required of a photograph if submitted digitally.

The Committee was satisfied that the proposed changes to the policy would serve to preclude photographs manipulated by AI.

The Committee recommends that the Board approve the proposed changes.

**Public Interest Considerations:**

The Committee considered that the proposed changes allows the public to accurately confirm who they are being treated by.

**Diversity, Equity and Inclusion Considerations:**

The Committee considered that the proposed changes to the policy allow registrants options in ways of submitting their photos while still meeting what the College needs for the photo requirement.

The inclusion of accepting digital image files removes financial barriers for applicants/registrants. The photo can be done on the individual's own time, without spending money at the post office or at a photography studio as long as it meets the requirements in the proposed policy changes.

**Risk Management Considerations:**

The Committee considered that if registrants do not have an ID badge that accurately reflects their appearance, it is possible that the person might not be who they are, which opens up questions of competence.

**Action Required:**

That the Board approve the proposed updates to the Photograph Submission Requirements policy or request a further review.

## REGISTRATION POLICY

### Photograph Submission Requirements

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New applicants and ~~existing~~ registrants of the College of Opticians of Ontario ~~who are applying to reinstate their certificate of registration, or renewing registrants who last submitted updated photographs five years prior,~~ are required to submit ~~one~~ an unaltered passport style photo ~~with their either at the time of application or no later than every five years. Sometimes, the College may require that registrants submit a new photo earlier than the five year mark.~~

Applicants and registrants are required to comply with the photo submission requirements listed below in order to avoid delays with the processing of their application, ~~or their application being rejected for not meeting this registration requirement.~~

#### Photograph Submission Requirement Checklist:

1. The photo must be a true likeness of the applicant or registrant;
2. The photo must be in colour;
3. The photo must be taken within the last 6 (six) months from the date of submission;
- ~~4. The photo must be signed on the front at the bottom;~~
- ~~5.~~4. The photo must be taken against a plain white or light-coloured background with enough contrast between the background, facial features and clothing, so that the applicant's or registrant's features are clearly distinguishable against the background;
- ~~6.~~5. The photo must be clear, sharp and in focus;
- ~~7. The photos must show a full front view of the face and top of the shoulders squared to the camera;~~
- ~~8.~~6. The photo must show a full head without any head covering, unless it is worn for religious beliefs or medical reasons. However, the head covering must not cast shadows on the face and the full face must be clearly visible;
- ~~9.~~7. Eyes must be open and clearly visible. Photos with the red eye effect or red eye alterations will not be accepted;
- ~~10.~~8. Prescription eyeglasses may be worn as long as the eyes are clearly visible and there is no reflection or glare on the eyeglasses;
- ~~11.~~9. The photos must show a full front view of the face and top of the shoulders squared to the camera (the image of the face and shoulders must be centred in the photo). The head must not be tilted to the side.

~~12.~~10. The photos must be originals and not taken from an existing photo or altered in any way; ~~and~~.

11. For digital photos: the photo must be sent to the College in a high-resolution format.

~~13.~~12. For hard copies: The photo must be printed on plain, high quality photographic paper with your signature on the back.

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