
Subject

Requirements for Alternative Documents and Processing in Compulsory Trades

Alternative documentation refers to information or material that is submitted in place of required documentation for the purposes of all registration processes where an applicant is unable to obtain standard documentation for reasons beyond their control.

This provision applies to all Canadian and internationally trained individuals seeking certification in the skilled trades with STO who are required to submit documents as proof of their experience, identity, training and other skills as part of a Trade Equivalency Assessment (TEA) application.

Alternative documentation may be submitted in a variety of formats.

Subject to section 12.1 of the *Fair Access to Regulated Professions and Compulsory Trades Act, 2006* (FARPACTA) and its regulation, acceptance by STO to assess these documents must be consistent with STO's responsibility to ensure public safety, regulatory integrity, or adherence to Ontario Training Standards.

The conditions beyond an applicant's control refers to circumstances in which the applicant is unable to obtain required documentation for TEA application despite demonstrating reasonable efforts. Such circumstances include, but are not limited to:

- armed conflict, war, civil unrest, or political instability that has destroyed or made records inaccessible
- natural disasters such as earthquakes, floods, or wildfires that have permanently destroyed records
- forced displacement, refugee or asylum status, or statelessness where obtaining documents is impossible or may create unsafe situation for the applicant
- employers, training institutions, or credential-issuing authorities that no longer exist, are bankrupt, closed, or non-functional or no other institution inherited the archives or records or no longer retains historical records
- government ministries or record-holding authorities that refuse to release documents or impose indefinite or unreasonable delays
- situations where seeking documents may expose the applicant or their family members to harm or persecution
- documented loss or destruction of personal records through theft, fire, or accident
- records are subject to state-controlled or inaccessible archival systems, with prolonged or indefinite delays, and
- other documented exceptional personal circumstances that make access of the records impossible.

For official documents, a waiting period exceeding 60 calendar days after the applicant has completed all required steps with the issuing institution will generally be considered unreasonable, unless the institution has provided a clear explanation for the delay and an anticipated timeline for delivery.

For other types of documentation, a waiting period exceeding 90 calendar days without a reasonable explanation or an anticipated timeline for delivery will generally be considered unreasonable.

The applicant must provide a written statement describing the nature of the barrier and the reasonable steps taken to obtain the required documentation.

Alternative documentation will not be considered where:

- the applicant prefers not to contact former employers or training institutions without legitimate justification
- documentation could still be obtained with further effort
- the applicant has no relevant work experience in the trade
- the applicant refuses to provide employer details without legitimate reason
- the applicant seeks to bypass standard verification requirements for convenience, or
- there is a risk of fraud or misrepresentation.

Applicants must submit at least two of the following forms of alternative documentation, unless STO determines that a single alternative is sufficient to confirm the applicant's experience, knowledge and skills:

- sworn statutory declarations by the applicant or the referee describing work experience and job duties
- photographs or videos showing the applicant performing trade-related tasks
- portfolios of work products, job logs, task lists, or work outputs
- training materials, unofficial or unfinished transcripts, certificates, course notes, or assessment reports
- letters from training instructors or employers describing the applicant's knowledge and skill level
- union cards, dues payment records, or dispatch logs
- business records such as purchase orders and receipts of machines, tools or equipment, bank documents proving payroll, or job-site access logs
- letters from community organizations, unions, professional associations, NGOs, or resettlement agencies familiar with the applicant's work
- apprenticeship admission, registration, or training assessment records, or
- other relevant documentation that may assist in establishing trade experience, knowledge, and skills.

The following will not be accepted as sufficient alternative documentation on their own:

- self-attestation or personal statements without corroboration
- social media profiles or informal online content that cannot be independently verified
- unsubstantiated photographs or videos not showing the practice of trade, relevant equipment or activities demonstrating the competence and skills in the trade
- letters of support that were provided by individuals without expertise in the relevant trade, or
- any documentation that is unverifiable, contradictory, or materially unreliable.

Where alternative documentation is accepted, STO may apply other assessment tools to verify experience and competency in addition to the submission of alternative documents. Additional assessment tools include, but are not limited to:

- **(Panel) interviews** conducted by qualified STO staff and/or subject-matter experts to assess:
 - a. understanding of scope of trade
 - b. safety protocols and regulatory requirements
 - c. the use of tools, equipment, and machines
 - d. technical tasks, diagnostic, and troubleshooting.
- **Third-party testimonials** to provide context on trade exposure, work environment, and types of tasks performed and may be considered from:

- a. employers, co-workers, trainers, trade associations, union representatives or other indirectly relevant persons who can attest for the applicant's experience, or
- b. community organizations, NGOs, or (un)licensed tradespeople familiar with the applicant's work.
- **Knowledge tests** multiple-choice or short-answer assessments aligned with Ontario Training Standards. Exemption tests, if available, may be used to confirm knowledge equivalency.
- **Practical demonstrations or skills test**, if available, to provide confirmation of competency. These are only available in specific trades where STO already maintains practical assessments or where industry SMEs can safely test discrete tasks. Demonstrations must meet safety and validity standards.

Applicants may be granted advanced standing in an apprenticeship where experience and competency assessment finds the applicant did not fully meet the requirements to be approved for TEA.

Any alternative documentation submitted in a language other than English or French must be accompanied by a certified translation.

These assessments do not replace the need to prove work experience or certifying examinations.

Application Process for Use of Alternative Documentation

Step 1: Applicants contact STO to explain what required standard documentation cannot be provided, why it cannot be provided, and what information or documents the applicant does have. STO will review the request and determine what pathways the applicant may move forward with.

Step 2: Applicants submit application and supporting materials, as directed by STO

Step 3: STO reviews the submission to confirm completeness.

Step 4: STO conducts the assessment of TEA application in accordance with this policy, and applicable legislation and regulations.

Step 5: The applicant will be notified in writing of the assessment outcome and any next steps.

Application Submission Methods

Submission may be completed through one of the following methods, as directed by STO:

- electronic submission through the STO portal or designated electronic intake system
- email submission to the STO assessment intake address identified by STO, or
- other submission method specified by STO in cases where alternative documentation or exceptional circumstances apply.

Applicants must follow the submission method and format communicated by STO. Applications or materials submitted outside the directed method may not be processed.

Processing Timelines for Alternative Documentation

An application is considered complete only once all required and/or alternative documents have been submitted and the application fee has been paid.

STO will issue written acknowledgement of receipt of alternative documentation within 10 calendar days.

STO will issue a decision within three months for international applications, and within thirty business days for domestic applications to which this policy applies.

STO processes applications and related requests under this policy in accordance with the timelines and requirements set out in FARPACTA and any applicable regulations.

Where complex verification, public safety considerations, or competency concerns require additional time, the applicant will be informed in writing of the reason for delay and of any further information required.

These timelines do not include the time required for completion of certifying examinations following a successful TEA approval.

The Registrar retains full discretion to:

- evaluate the sufficiency and credibility of alternative documentation
- require additional verification or clarification
- approve or refuse alternative documentation as sufficient for parallel processing or required additional documents, tests or assessments
- ensure that regulatory standards and public safety are not compromised, and
- determine if other exceptional circumstances are applicable to a specific applicant.

Effective Date

March 12, 2026, version 1.0

Document History

Versions

Section amended	Amendment	Page reference

Approval

This policy was approved by the STO Registrar and CEO on March 12, 2026.

This policy was approved by the Ontario Fairness Commissioner on March 16, 2026.