

# CALMSHELL Master Policy Framework

## Complete Policy Package

**Version:** 1.0  
**Date:** June 2026  
**Status:** Draft for Implementation  
**Jurisdiction:** Canada (Ontario Primary, Expandable to Other Provinces)

### Package Contents

This comprehensive policy package contains 16 policies across 3 phases, totaling 230+ pages of Canada-compliant governance documentation for CALMSHELL.

### Directory Structure

|                                  |                                                                                                                                                                        |
|----------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| CALMSHELL_MASTER_POLICY_PACKAGE/ |                                                                                                                                                                        |
|                                  | Phase1/ <ul style="list-style-type: none"><li>  CALMSHELL_MASTER_POLICY_FRAMEWORK_PHASE1.md</li></ul>                                                                  |
|                                  | Phase2/ <ul style="list-style-type: none"><li>  CALMSHELL_MASTER_POLICY_FRAMEWORK_PHASE2.md</li></ul>                                                                  |
|                                  | Phase3/ <ul style="list-style-type: none"><li>  CALMSHELL_MASTER_POLICY_FRAMEWORK_PHASE3.md</li></ul>                                                                  |
|                                  | Implementation_Guides/ <ul style="list-style-type: none"><li>  IMPLEMENTATION_ROADMAP.md</li><li>  COMPLIANCE_CHECKLIST.md</li><li>  STAFF_TRAINING_GUIDE.md</li></ul> |
|                                  | Supporting_Documents/ <ul style="list-style-type: none"><li>  POLICY_OVERVIEW.md</li><li>  REGULATORY_COMPLIANCE_MAP.md</li><li>  GLOSSARY.md</li></ul>                |
|                                  | └─ README.md (this file)                                                                                                                                               |

## Quick Navigation

### **Phase 1: Core Legal & Platform Policies (5 Policies)**

- 1 **Terms of Service** – Platform rules, user responsibilities, liability limits
- 2 **Privacy Policy** – Data collection, use, sharing, retention (PIPEDA/PHIPA compliant)
- 3 **Consent to Services Policy** – Informed consent framework for therapy services
- 4 **Cookie Policy** – Tracking technologies and user control
- 5 **Accessibility Policy** – WCAG 2.1 Level AA compliance (AODA adherence)

**File:** Phase1/CALMSHELL MASTER POLICY FRAMEWORK PHASE1.md

**Pages:** 50+

**Implementation Time:** 4 weeks

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### **Phase 2: Clinical & Therapy Policies (7 Policies)**

- 6 **Therapist Verification Policy** – Credential verification, license monitoring
- 7 **Scope of Practice Policy** – CALMSHELL's role vs. clinical provider
- 8 **Telehealth / Virtual Care Policy** – Video, chat, phone therapy standards
- 9 **Crisis Response & Escalation Policy** – Crisis identification and response procedures
- 10 **Clinical Documentation Policy** – Session notes, treatment plans, retention
- 11 **AI & Automated Recommendation Policy** – AI use, bias mitigation, human oversight
- 12 **Postpartum Pathway Clinical Policy** – Specialized perinatal mental health services

**File:** Phase2/CALMSHELL MASTER POLICY FRAMEWORK PHASE2.md

**Pages:** 80+

**Implementation Time:** 6 weeks

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### **Phase 3: Health Information & Security Policies (4 Policies)**

- 13 **Data Protection & Encryption Policy** – Encryption standards, key management, access control
- 14 **Confidentiality Policy** – Confidentiality obligations, authorized disclosures, legal exceptions
- 15 **Health Information Retention Policy** – Retention periods, storage, destruction procedures

## 16 Cybersecurity Incident Response Policy – Incident detection, response, breach notification

**File:** Phase3/CALMSHELL MASTER POLICY FRAMEWORK PHASE3.md

**Pages:** 100+

**Implementation Time:** 5 weeks

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### Policy Statistics

| Metric                            | Value |
|-----------------------------------|-------|
| Total Policies                    | 16    |
| Total Pages                       | 230+  |
| Implementation Checklists         | 16    |
| Implementation Tasks              | 150+  |
| Regulatory Requirements Addressed | 85%   |
| Compliance Tracking Items         | 40+   |

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### Regulatory Compliance

#### Canadian Regulations Covered

- **PIPEDA** – Personal Information Protection and Electronic Documents Act
- **PHIPA** – Personal Health Information Protection Act (Ontario)
- **AODA** – Accessibility for Ontarians with Disabilities Act
- **Mental Health Act** – Crisis and mandatory reporting
- **Health Care Consent Act** – Informed consent requirements
- **CASL** – Anti-Spam Legislation

- **Professional Standards** – College of Psychologists, OCSWSSW, provincial regulatory bodies

## Industry Standards Aligned

- **ISO 27001** – Information Security Management System
  - **NIST Cybersecurity Framework** – Risk management and incident response
  - **CIS Controls** – Critical security controls
  - **OWASP Top 10** – Web application security
  - **SOC 2 Type II** – Service organization controls
  - **WCAG 2.1 Level AA** – Web accessibility standards
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## Implementation Guide

### Getting Started

- 17 **Review Phase 1 Policies** (Week 1-2)
  - Read all 5 Phase 1 policies
  - Review implementation checklists
  - Assign responsible parties
- 18 **Implement Phase 1** (Week 3-6)
  - Execute implementation tasks
  - Complete compliance tracking
  - Train staff
- 19 **Review Phase 2 Policies** (Week 7-8)
  - Read all 7 Phase 2 policies
  - Review clinical standards
  - Engage clinical team
- 20 **Implement Phase 2** (Week 9-14)
  - Execute implementation tasks
  - Verify therapist credentials
  - Establish clinical procedures
- 21 **Review Phase 3 Policies** (Week 15-16)
  - Read all 4 Phase 3 policies
  - Review security requirements
  - Engage IT security team
- 22 **Implement Phase 3** (Week 17-21)
  - Execute implementation tasks
  - Implement encryption and access control

- Establish incident response procedures

## Implementation Timeline

**Total Implementation Time:** 21 weeks (5 months)

- **Phase 1:** 4 weeks (Weeks 1-4)
  - **Phase 2:** 6 weeks (Weeks 5-10)
  - **Phase 3:** 5 weeks (Weeks 11-15)
  - **Integration & Testing:** 6 weeks (Weeks 16-21)
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## Responsible Parties

### Executive Leadership

- **Chief Executive Officer (CEO)** – Overall governance and accountability
- **Chief Information Security Officer (CISO)** – Security and incident response
- **Chief Clinical Officer (CCO)** – Clinical standards and therapist oversight
- **General Counsel** – Legal compliance and regulatory affairs

### Implementation Teams

- **Legal Team** – Policy development, legal review, regulatory compliance
  - **Clinical Team** – Clinical standards, therapist training, quality assurance
  - **IT Security Team** – Encryption, access control, incident response
  - **IT Infrastructure Team** – System security, backups, disaster recovery
  - **HR Team** – Staff training, confidentiality agreements, onboarding
  - **Compliance Team** – Compliance tracking, audits, documentation
  - **Product Team** – Platform implementation, user interface updates
  - **Support Team** – User education, FAQ, support procedures
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## **Key Features of This Package**

### **Comprehensive Coverage**

- ✓ Legal framework (Terms, Privacy, Consent)
- ✓ Clinical standards (Therapist verification, scope of practice)
- ✓ Technology & security (Encryption, incident response)
- ✓ Health information management (Retention, confidentiality)
- ✓ Accessibility & compliance (AODA, WCAG)

### **Implementation Ready**

- ✓ Detailed implementation checklists
- ✓ Task assignments and deadlines
- ✓ Compliance tracking matrices
- ✓ Responsible party assignments
- ✓ Training requirements

### **User-Focused**

- ✓ Plain language explanations
- ✓ User-facing disclosure templates
- ✓ Consent forms and agreements
- ✓ Privacy and accessibility accommodations

### **Regulatory Aligned**

- ✓ PIPEDA compliance
  - ✓ PHIPA compliance
  - ✓ AODA compliance
  - ✓ Professional standards alignment
  - ✓ Industry best practices
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## **Security & Privacy Highlights**

### **Data Protection**

- **AES-256 Encryption** – All sensitive data encrypted at rest
- **TLS 1.2+** – Secure data transmission
- **Canadian Data Residency** – All data stored in Canada
- **Multi-Factor Authentication** – All staff access protected

- **Immutable Audit Logging** – All access logged and monitored

## **Incident Response**

- **Real-Time Detection** – Intrusion detection and monitoring
- **4-Hour Recovery Time** – Services restored within 4 hours
- **1-Hour Recovery Point** – Data loss limited to 1 hour
- **Breach Notification** – User notification within 10 days
- **Quarterly Testing** – Disaster recovery procedures tested

## **Clinical Safety**

- **Crisis Response** – 24/7 crisis hotline and escalation
  - **Therapist Verification** – License verification and monitoring
  - **Mandatory Reporting** – Compliance with reporting requirements
  - **Safety Planning** – Documented safety plans for at-risk clients
  - **Infant Safety** – Assessment and monitoring for postpartum services
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## **How to Use This Package**

### **For Executives**

- 23 Review the **POLICY\_OVERVIEW.md** in Supporting\_Documents
- 24 Review the **REGULATORY\_COMPLIANCE\_MAP.md** to understand regulatory requirements
- 25 Review the **IMPLEMENTATION\_ROADMAP.md** to understand timeline and resource requirements

### **For Legal Team**

- 26 Review all policies in Phase 1, 2, and 3
- 27 Customize policies with organizational details (contact information, procedures)
- 28 Review with external counsel for additional compliance requirements
- 29 Implement user-facing disclosures and consent forms

### **For Clinical Team**

- 30 Review Phase 2 policies (Clinical & Therapy Policies)
- 31 Develop therapist training materials based on policies
- 32 Establish clinical procedures and documentation standards

- 33 Implement crisis response and safety procedures

### **For IT Security Team**

- 34 Review Phase 3 policies (Health Information & Security Policies)
- 35 Implement encryption, access control, and monitoring
- 36 Establish incident response procedures
- 37 Conduct security testing and audits

### **For Compliance Team**

- 38 Review all policies and implementation checklists
  - 39 Create compliance tracking spreadsheet
  - 40 Schedule regular compliance reviews
  - 41 Maintain compliance documentation
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## **Training & Support**

### **Staff Training**

Each policy includes training requirements for relevant staff:

- Confidentiality and privacy training
- Crisis response training
- Incident response training
- Clinical documentation standards
- Security best practices

### **User Education**

User-facing materials should be developed for:

- Privacy and data protection
- Consent and informed choice
- Crisis resources and support
- Accessibility accommodations
- Policy questions and support

### **Ongoing Support**

- **Quarterly Compliance Reviews** – Review policies and procedures

- **Annual Audits** – Comprehensive compliance audits
  - **Incident Reviews** – Post-incident analysis and improvement
  - **Policy Updates** – Update policies as regulations change
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## **Contact & Support**

For questions about these policies:

- **Legal Questions:** [legal@calmshell.ca](mailto:legal@calmshell.ca)
  - **Privacy Questions:** [privacy@calmshell.ca](mailto:privacy@calmshell.ca)
  - **Security Questions:** [security@calmshell.ca](mailto:security@calmshell.ca)
  - **Clinical Questions:** [clinical@calmshell.ca](mailto:clinical@calmshell.ca)
  - **Accessibility Questions:** [accessibility@calmshell.ca](mailto:accessibility@calmshell.ca)
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## **Document Versions**

| Version | Date      | Changes                                |
|---------|-----------|----------------------------------------|
| 1.0     | June 2026 | Initial comprehensive policy framework |

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## **Legal Disclaimer**

These policies are provided as a framework for CALMSHELL's governance and compliance. While comprehensive, they should be reviewed by qualified legal counsel to ensure compliance with all applicable laws and regulations in your specific jurisdiction. These policies may need to be customized based on your specific business model, technology infrastructure, and regulatory requirements.

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## Next Steps

### **Remaining Phases (Not Yet Developed)**

#### **Phase 4: Community & Social Policies (4 Policies)**

- Community Guidelines
- Moderation Policy
- Volunteer Policy
- Peer Support Disclaimer Policy

#### **Phase 5: Corporate & Educational Policies (3 Policies)**

- Institutional Data Access Policy
- Workplace Wellness Policy
- Student Wellness & Academic Stress Policy

#### **Phase 6: Payment & Billing Policies (3 Policies)**

- Subscription & Billing Policy
- Marketplace Payment Policy
- Refund Policy

#### **Phase 7: Learning & Academy Policies (2 Policies)**

- CPD & Certification Policy
- Intellectual Property Policy

#### **Phase 8: Research & Assessment (2 Policies)**

- Research Ethics Policy
- Assessment & Screening Disclaimer Policy

#### **Phase 9: Internal Governance (5 Policies)**

- Staff Code of Conduct
- Equity, Diversity & Inclusion (EDI) Policy
- Anti-Oppression & Cultural Safety Policy
- Complaints & Dispute Resolution Policy
- Risk Management Policy

**Total Remaining:** 19 policies

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## Package Information

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**Version:** 1.0

**Date Created:** June 2026

**Total Size:** 230+ pages

**Format:** Markdown (.md files)

**Jurisdiction:** Canada (Ontario Primary)

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**Status:** ☒ Phase 1, 2, 3 Complete | 16 of 35 Policies Delivered

**Ready for Implementation:** Yes

**External Legal Review Recommended:** Yes

**Estimated Implementation Time:** 21 weeks

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For more information or to request additional phases, contact the CALMSHELL compliance team.