

CALMSHELL Master Policy Framework

Compliance Checklist

Version: 1.0

Date: June 2026

Purpose: Track compliance with all 16 policies and regulatory requirements

Phase 1: Core Legal & Platform Policies

Policy 1: Terms of Service

Policy Development

- ☐ Draft Terms of Service document
- ☐ Review with external counsel
- ☐ Obtain executive approval
- ☐ Customize for CALMSHELL services

Platform Integration

- ☐ Integrate into website
- ☐ Integrate into mobile apps (iOS/Android)
- ☐ Create acceptance mechanism (checkbox)
- ☐ Require acceptance at registration
- ☐ Require acceptance for therapy booking

User Communication

- ☐ Create user-friendly summary
- ☐ Create FAQ about Terms
- ☐ Train customer support
- ☐ Create help documentation

Ongoing Compliance

- ☐ Establish version control system
- ☐ Document all changes and updates
- ☐ Communicate changes to users

- ☐ Review annually

Compliance Status: ☐ Not Started ☐ In Progress ☐ Complete

Last Reviewed: [Date]

Next Review: [Date]

Policy 2: Privacy Policy

Policy Development

- ☐ Conduct privacy impact assessment
- ☐ Audit current data collection practices
- ☐ Draft Privacy Policy document
- ☐ Review with external counsel
- ☐ Obtain executive approval

Data Management

- ☐ Document all data collection points
- ☐ Document all third-party data sharing
- ☐ Create data retention schedule
- ☐ Establish data access procedures
- ☐ Create user data request process

Platform Integration

- ☐ Integrate into website
- ☐ Integrate into mobile apps
- ☐ Create privacy settings interface
- ☐ Implement data export functionality
- ☐ Implement data deletion functionality

User Communication

- ☐ Create user-friendly privacy summary
- ☐ Create FAQ about privacy
- ☐ Train customer support
- ☐ Create help documentation

Ongoing Compliance

- ☐ Implement privacy by design principles

- ☐ Conduct quarterly privacy audits
- ☐ Review annually
- ☐ Update for regulatory changes

Compliance Status: ☐ Not Started ☐ In Progress ☐ Complete

Last Reviewed: [Date]

Next Review: [Date]

Policy 3: Consent to Services Policy

Policy Development

- ☐ Develop consent form template
- ☐ Review with external counsel
- ☐ Review with clinical advisors
- ☐ Customize for CALMSHELL services

Consent Implementation

- ☐ Integrate into registration flow
- ☐ Integrate into therapy booking flow
- ☐ Create comprehension check questions
- ☐ Create parental consent forms for minors
- ☐ Create minor assent forms
- ☐ Create postpartum-specific consent forms

Documentation & Procedures

- ☐ Establish consent documentation procedures
- ☐ Create consent record retention procedures
- ☐ Create consent withdrawal procedures
- ☐ Train therapists on consent procedures

User Communication

- ☐ Create user-facing consent documentation
- ☐ Create FAQ about consent
- ☐ Train customer support

Ongoing Compliance

- ☐ Review consent procedures quarterly

- ☐ Update for regulatory changes
- ☐ Audit consent documentation

Compliance Status: ☐ Not Started ☐ In Progress ☐ Complete

Last Reviewed: [Date]

Next Review: [Date]

Policy 4: Cookie Policy

Policy Development

- ☐ Audit all cookies used on website
- ☐ Audit all cookies used in mobile apps
- ☐ Categorize cookies by type
- ☐ Draft Cookie Policy document
- ☐ Review with external counsel

Cookie Implementation

- ☐ Integrate into website
- ☐ Integrate into mobile apps
- ☐ Implement cookie consent banner
- ☐ Create cookie preference center
- ☐ Implement Do Not Track support

Documentation & Procedures

- ☐ Document third-party cookie policies
- ☐ Create cookie management procedures
- ☐ Train support team on cookie questions

User Communication

- ☐ Create user-friendly cookie summary
- ☐ Create FAQ about cookies
- ☐ Provide opt-out instructions

Ongoing Compliance

- ☐ Review cookies quarterly
- ☐ Update for regulatory changes
- ☐ Audit cookie compliance

Compliance Status: ☐ Not Started ☐ In Progress ☐ Complete

Last Reviewed: [Date]

Next Review: [Date]

Policy 5: Accessibility Policy

Policy Development

- ☐ Conduct accessibility audit
- ☐ Identify accessibility gaps
- ☐ Draft Accessibility Policy
- ☐ Review with disability advocates

Accessibility Implementation

- ☐ Implement WCAG 2.1 Level AA standards
- ☐ Add screen reader support
- ☐ Implement keyboard navigation
- ☐ Add captions to video content
- ☐ Create transcripts for audio content
- ☐ Implement text resizing
- ☐ Ensure color contrast compliance
- ☐ Create accessible forms

Accessibility Features

- ☐ Create accessibility statement
- ☐ Establish accessibility feedback process
- ☐ Create accessibility accommodations request form
- ☐ Train staff on accessibility

Testing & Verification

- ☐ Conduct accessibility testing
- ☐ Test with screen readers
- ☐ Test keyboard navigation
- ☐ Conduct user testing with disabled users

Ongoing Compliance

- ☐ Conduct quarterly accessibility testing

- ☐ Review for regulatory changes
- ☐ Update accessibility features

Compliance Status: ☐ Not Started ☐ In Progress ☐ Complete

Last Reviewed: [Date]

Next Review: [Date]

Phase 2: Clinical & Therapy Policies

Policy 6: Therapist Verification Policy

Verification System Development

- ☐ Develop credential verification checklist
- ☐ Create therapist application form
- ☐ Establish regulatory body verification process
- ☐ Implement background check process
- ☐ Create insurance verification system

Verification Implementation

- ☐ Verify initial therapist credentials
- ☐ Conduct background checks
- ☐ Verify professional liability insurance
- ☐ Verify license status with regulatory bodies
- ☐ Document verification results

Ongoing Verification

- ☐ Develop annual renewal process
- ☐ Create license monitoring system
- ☐ Establish appeals process
- ☐ Create therapist removal procedures
- ☐ Create public verification system

Compliance Tracking

- ☐ Track all therapist verifications
- ☐ Track license renewals
- ☐ Track disciplinary actions
- ☐ Document all verification evidence

Compliance Status: ☐ Not Started ☐ In Progress ☐ Complete

Last Reviewed: [Date]

Next Review: [Date]

Policy 7: Scope of Practice Policy

Policy Development

- ☐ Draft Scope of Practice policy
- ☐ Review with clinical advisors
- ☐ Customize for CALMSHELL services

Implementation

- ☐ Create therapist training materials
- ☐ Create coach/peer supporter guidelines
- ☐ Develop limitation disclaimers
- ☐ Integrate disclaimers into platform
- ☐ Create professional liability requirements
- ☐ Establish insurance verification

Communication

- ☐ Train therapists on scope of practice
- ☐ Create user-facing scope of practice documentation
- ☐ Train support team
- ☐ Create monitoring procedures

Compliance Status: ☐ Not Started ☐ In Progress ☐ Complete

Last Reviewed: [Date]

Next Review: [Date]

Policy 8: Telehealth / Virtual Care Policy

Policy Development

- ☐ Develop virtual care standards
- ☐ Create assessment tool for virtual care suitability

- ☐ Develop informed consent form for virtual care

Technology Implementation

- ☐ Implement video encryption
- ☐ Implement real-time captioning
- ☐ Create crisis response procedures for virtual sessions
- ☐ Develop technical failure contingency procedures

Training & Procedures

- ☐ Create therapist training on virtual care
- ☐ Create user guidance on virtual care privacy
- ☐ Train therapists on virtual care standards
- ☐ Create support documentation

Compliance Status: ☐ Not Started ☐ In Progress ☐ Complete

Last Reviewed: [Date]

Next Review: [Date]

Policy 9: Crisis Response & Escalation Policy

Crisis System Development

- ☐ Develop crisis identification training
- ☐ Create risk assessment tools
- ☐ Implement AI risk scoring system
- ☐ Develop safety planning templates
- ☐ Create crisis response procedures

Crisis Services

- ☐ Establish 24/7 crisis hotline
- ☐ Train crisis hotline staff
- ☐ Create emergency services coordination procedures
- ☐ Develop mandatory reporting procedures
- ☐ Create crisis resource database

Training & Procedures

- ☐ Train all therapists on crisis response
- ☐ Create crisis response documentation

- ☐ Create post-crisis follow-up procedures

Compliance Status: ☐ Not Started ☐ In Progress ☐ Complete

Last Reviewed: [Date]

Next Review: [Date]

Policy 10: Clinical Documentation Policy

Documentation System Development

- ☐ Develop documentation standards
- ☐ Create session note template
- ☐ Create treatment plan template
- ☐ Create progress note template
- ☐ Create data retention schedule

System Implementation

- ☐ Implement documentation system in platform
- ☐ Implement encryption for documentation
- ☐ Create access control system
- ☐ Implement audit logging
- ☐ Implement backup encryption

Procedures & Training

- ☐ Create client access procedures
- ☐ Develop documentation audit process
- ☐ Train therapists on documentation standards
- ☐ Create documentation guidelines

Compliance Status: ☐ Not Started ☐ In Progress ☐ Complete

Last Reviewed: [Date]

Next Review: [Date]

Policy 11: AI & Automated Recommendation Policy

AI Governance

- ☐ Develop AI governance framework
- ☐ Create AI policy and guidelines
- ☐ Review AI algorithms for bias
- ☐ Create AI transparency documentation

Implementation

- ☐ Implement human oversight procedures
- ☐ Create opt-out mechanisms
- ☐ Develop AI audit procedures
- ☐ Create user education materials on AI
- ☐ Establish AI Governance Committee

Compliance & Training

- ☐ Train staff on AI governance
- ☐ Document AI use and limitations
- ☐ Create bias testing procedures

Compliance Status: ☐ Not Started ☐ In Progress ☐ Complete

Last Reviewed: [Date]

Next Review: [Date]

Policy 12: Postpartum Pathway Clinical Policy

Postpartum Services Development

- ☐ Develop postpartum clinical standards
- ☐ Create postpartum screening tools
- ☐ Develop postpartum assessment template
- ☐ Create postpartum therapist training program

Implementation

- ☐ Develop infant safety assessment procedures
- ☐ Create provider coordination templates
- ☐ Develop medication safety resources
- ☐ Create postpartum psychosis response procedures
- ☐ Develop perinatal loss support resources

Training & Documentation

- ☐ Create postpartum documentation templates
- ☐ Train therapists on postpartum care
- ☐ Create user education materials on postpartum services

Compliance Status: ☐ Not Started ☐ In Progress ☐ Complete

Last Reviewed: [Date]

Next Review: [Date]

Phase 3: Health Information & Security Policies

Policy 13: Data Protection & Encryption Policy

Encryption Implementation

- ☐ Implement TLS 1.2+ for all web traffic
- ☐ Implement certificate pinning in mobile apps
- ☐ Implement AES-256 encryption for databases
- ☐ Implement file system encryption
- ☐ Implement backup encryption

Key Management

- ☐ Establish key management system
- ☐ Implement key rotation procedures (annual)
- ☐ Create key backup procedures
- ☐ Test key recovery procedures

Access Control

- ☐ Implement multi-factor authentication for all staff
- ☐ Implement role-based access control
- ☐ Create principle of least privilege procedures
- ☐ Implement access reviews (quarterly)

Monitoring & Auditing

- ☐ Implement audit logging for all data access
- ☐ Create immutable log storage
- ☐ Implement real-time monitoring
- ☐ Create anomaly detection procedures

Compliance Status: ☐ Not Started ☐ In Progress ☐ Complete
Last Reviewed: [Date]
Next Review: [Date]

Policy 14: Confidentiality Policy

Confidentiality Framework

- ☐ Create confidentiality agreements for all staff
- ☐ Develop disclosure procedures
- ☐ Create legal hold procedures
- ☐ Develop therapist-client privilege procedures

Training & Procedures

- ☐ Conduct confidentiality training for all staff
- ☐ Create breach notification procedures
- ☐ Implement group confidentiality guidelines
- ☐ Create institutional partner agreements

Monitoring & Compliance

- ☐ Create confidentiality breach investigation procedures
- ☐ Implement breach documentation procedures
- ☐ Create breach notification procedures
- ☐ Conduct quarterly confidentiality audits

Compliance Status: ☐ Not Started ☐ In Progress ☐ Complete
Last Reviewed: [Date]
Next Review: [Date]

Policy 15: Health Information Retention Policy

Retention Schedule Development

- ☐ Develop retention schedule by data type
- ☐ Document retention periods
- ☐ Create retention policy documentation
- ☐ Establish legal hold procedures

Retention Implementation

- ☐ Implement automated deletion system
- ☐ Implement secure deletion procedures
- ☐ Create destruction certification procedures
- ☐ Implement backup retention schedule

User Procedures

- ☐ Create user deletion request procedures
- ☐ Create retention audit procedures
- ☐ Create institutional partner retention agreements

Compliance Monitoring

- ☐ Train staff on retention procedures
- ☐ Conduct quarterly retention audits
- ☐ Document retention compliance

Compliance Status: ☐ Not Started ☐ In Progress ☐ Complete

Last Reviewed: [Date]

Next Review: [Date]

Policy 16: Cybersecurity Incident Response Policy

Incident Response Planning

- ☐ Develop incident response plan
- ☐ Create incident classification procedures
- ☐ Establish Incident Response Team
- ☐ Create incident response procedures

Detection & Monitoring

- ☐ Implement intrusion detection system (IDS)
- ☐ Implement endpoint detection & response (EDR)
- ☐ Implement SIEM system
- ☐ Create alerting procedures

Response Procedures

- ☐ Create communication templates

- ☐ Create user notification procedures
- ☐ Create regulatory notification procedures
- ☐ Implement ransomware response procedures
- ☐ Implement DDoS mitigation

Business Continuity

- ☐ Create business continuity plan
- ☐ Create disaster recovery plan
- ☐ Test disaster recovery procedures (quarterly)
- ☐ Document recovery procedures

Training & Improvement

- ☐ Create incident response training program
- ☐ Train all staff on incident response
- ☐ Create post-incident review procedures
- ☐ Document incident response plan

Compliance Status: ☐ Not Started ☐ In Progress ☐ Complete

Last Reviewed: [Date]

Next Review: [Date]

Regulatory Compliance Summary

PIPEDA Compliance

Personal Information Protection

- ☐ Privacy Policy compliant with PIPEDA
- ☐ Data collection practices documented
- ☐ Third-party data sharing agreements in place
- ☐ User rights procedures implemented (access, correction, deletion)
- ☐ Breach notification procedures implemented
- ☐ Privacy impact assessments conducted

Compliance Status: ☐ Not Compliant ☐ Partially Compliant ☐ Fully Compliant

PHIPA Compliance (Ontario)

Health Information Protection

- ☐ Privacy Policy compliant with PHIPA
- ☐ Health information storage procedures implemented
- ☐ Confidentiality obligations documented
- ☐ Authorized disclosure procedures implemented
- ☐ Breach notification procedures implemented
- ☐ Health information retention schedule established

Compliance Status: ☐ Not Compliant ☐ Partially Compliant ☐ Fully Compliant

AODA Compliance (Ontario)

Accessibility Standards

- ☐ Website meets WCAG 2.1 Level AA standards
- ☐ Mobile apps meet WCAG 2.1 Level AA standards
- ☐ Accessibility statement published
- ☐ Accessibility feedback process established
- ☐ Accessibility accommodations available
- ☐ Accessibility testing conducted (quarterly)

Compliance Status: ☐ Not Compliant ☐ Partially Compliant ☐ Fully Compliant

Mental Health Act Compliance

Crisis & Mandatory Reporting

- ☐ Crisis response procedures implemented
- ☐ Mandatory reporting procedures implemented
- ☐ Staff trained on mandatory reporting
- ☐ Crisis resources provided to users
- ☐ Emergency escalation procedures documented

Compliance Status: ☐ Not Compliant ☐ Partially Compliant ☐ Fully Compliant

Health Care Consent Act Compliance

Informed Consent

- ☐ Consent to Services Policy implemented
- ☐ Consent forms created and approved
- ☐ Consent documentation procedures implemented
- ☐ Parental consent procedures for minors implemented
- ☐ Consent withdrawal procedures implemented

Compliance Status: ☐ Not Compliant ☐ Partially Compliant ☐ Fully Compliant

Professional Standards Compliance

Therapist Standards

- ☐ Therapist verification procedures implemented
- ☐ License verification and monitoring system established
- ☐ Professional liability insurance required
- ☐ Clinical documentation standards established
- ☐ Crisis response procedures implemented
- ☐ Confidentiality obligations documented

Compliance Status: ☐ Not Compliant ☐ Partially Compliant ☐ Fully Compliant

Overall Compliance Status

Phase 1 Compliance: ☐ 0-25% ☐ 25-50% ☐ 50-75% ☐ 75-100%

Phase 2 Compliance: ☐ 0-25% ☐ 25-50% ☐ 50-75% ☐ 75-100%

Phase 3 Compliance: ☐ 0-25% ☐ 25-50% ☐ 50-75% ☐ 75-100%

Overall Compliance: ☐ 0-25% ☐ 25-50% ☐ 50-75% ☐ 75-100%

Compliance Review Schedule

Quarterly Reviews (Every 3 months)

- Privacy Policy and data practices
- Incident response procedures
- Access control audits
- Encryption key rotation

Semi-Annual Reviews (Every 6 months)

- Data protection standards
- Confidentiality procedures
- Retention compliance
- Therapist verification status

Annual Reviews (Every 12 months)

- All policies
 - Regulatory landscape assessment
 - Security testing and penetration testing
 - Disaster recovery testing
 - Staff training updates
-

Compliance Documentation

Evidence to Maintain

- ☐ Policy approval documentation
- ☐ Implementation completion records
- ☐ Staff training completion records
- ☐ Audit reports and findings
- ☐ Incident reports and responses
- ☐ Regulatory correspondence
- ☐ Third-party audit reports
- ☐ Penetration testing reports
- ☐ Vulnerability assessment reports
- ☐ Backup recovery test results

Sign-Off

Compliance Officer: _____ **Date:** _____

Legal Counsel: _____ **Date:** _____

Chief Information Security Officer: _____ **Date:** _____

Chief Clinical Officer: _____ **Date:** _____

Executive Leadership: _____ **Date:** _____

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