

CALMSHELL Master Policy Framework

Master Integration Document & Cross-Reference Matrix

Version: 1.0
Date: June 2026
Jurisdiction: Canada (Ontario Primary)
Total Policies: 35
Total Pages: 500+

Executive Summary

The CALMSHELL Master Policy Framework comprises 35 comprehensive policies organized into 9 phases, creating a complete governance structure for CALMSHELL's operations as a mental health technology platform, therapy marketplace, educational academy, and community ecosystem.

This Master Integration Document provides:

- 1 **Complete Policy Inventory** – All 35 policies with descriptions
 - 2 **Cross-Reference Matrix** – How policies relate to each other
 - 3 **Implementation Roadmap** – Phased implementation timeline
 - 4 **Compliance Mapping** – Regulatory requirements for each policy
 - 5 **Stakeholder Guide** – Who is responsible for each policy
 - 6 **Integration Points** – How policies work together
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Part 1: Complete Policy Inventory

PHASE 1: CORE LEGAL & PLATFORM POLICIES (5 Policies)

#	Policy Name	Focus	Pages	Key Stakeholders
1	Terms of Service	Platform rules, user responsibilities, liability	15	Legal, Users, Support

#	Policy Name	Focus	Pages	Key Stakeholders
2	Privacy Policy	Data collection, use, sharing, user rights	20	Legal, Privacy Officer, Users
3	Consent to Services Policy	Informed consent, therapy services	15	Clinical, Legal, Users
4	Cookie Policy	Tracking, cookies, user control	10	Technology, Legal, Users
5	Accessibility Policy	WCAG compliance, accessibility accommodations	12	Technology, Operations, Users

Phase 1 Total: 72 pages | **Implementation Timeline:** 4 weeks

PHASE 2: CLINICAL & THERAPY POLICIES (7 Policies)

#	Policy Name	Focus	Pages	Key Stakeholders
6	Therapist Verification Policy	Credential verification, license monitoring	18	Clinical, HR, Therapists
7	Scope of Practice Policy	Professional boundaries, service limitations	15	Clinical, Legal, Therapists
8	Telehealth / Virtual Care Policy	Virtual service standards, technology	18	Clinical, Technology, Therapists
9	Crisis Response & Escalation Policy	Crisis procedures, emergency protocols	20	Clinical, Operations, Support
10	Clinical Documentation Policy	Record-keeping, documentation standards	16	Clinical, Compliance, Therapists
11	AI & Automated Recommendation Policy	AI ethics, algorithm transparency	18	Technology, Clinical, Legal
12	Postpartum Pathway Clinical Policy	Postpartum-specific services, support	15	Clinical, Therapists, Users

Phase 2 Total: 120 pages | **Implementation Timeline:** 6 weeks

PHASE 3: HEALTH INFORMATION & SECURITY POLICIES (4 Policies)

#	Policy Name	Focus	Pages	Key Stakeholders
13	Data Protection & Encryption Policy	Encryption, data security, infrastructure	22	Technology, Security, Compliance
14	Confidentiality Policy	Confidentiality obligations, access control	18	Clinical, Legal, All Staff
15	Health Information Retention Policy	Data retention, deletion, archiving	16	Compliance, Operations, IT
16	Cybersecurity Incident Response Policy	Incident procedures, breach notification	20	Technology, Security, Legal

Phase 3 Total: 76 pages | **Implementation Timeline:** 5 weeks

PHASE 4: COMMUNITY & SOCIAL POLICIES (4 Policies)

#	Policy Name	Focus	Pages	Key Stakeholders
17	Community Guidelines Policy	Community standards, acceptable conduct	15	Community, Moderation, Users
18	Content Moderation Policy	Moderation procedures, removal standards	18	Community, Legal, Moderation
19	Volunteer Support Program Policy	Volunteer management, support, training	16	HR, Community, Volunteers
20	Peer Support Disclaimer Policy	Peer support limitations, disclaimers	12	Clinical, Legal, Peer Supporters

Phase 4 Total: 61 pages | **Implementation Timeline:** 4 weeks

PHASE 5: CORPORATE & EDUCATIONAL POLICIES (3 Policies)

#	Policy Name	Focus	Pages	Key Stakeholders
21	Institutional Data Access Policy	Data sharing, institutional partnerships	20	Partnerships, Legal, Compliance
22	Workplace Wellness Program Policy	Employer programs, employee privacy	20	Partnerships, HR, Users
23	Student Wellness & Academic Stress Policy	Educational partnerships, student support	20	Partnerships, Clinical, Students

Phase 5 Total: 60 pages | **Implementation Timeline:** 4 weeks

PHASE 6: PAYMENT & BILLING POLICIES (3 Policies)

#	Policy Name	Focus	Pages	Key Stakeholders
24	Subscription & Billing Policy	Subscriptions, billing, payment terms	20	Finance, Operations, Users
25	Marketplace Payment Policy	Provider payments, revenue sharing	20	Finance, Therapists, Operations
26	Refund & Cancellation Policy	Refunds, cancellations, dispute resolution	20	Finance, Legal, Users

Phase 6 Total: 60 pages | **Implementation Timeline:** 4 weeks

PHASE 7: LEARNING & ACADEMY POLICIES (2 Policies)

#	Policy Name	Focus	Pages	Key Stakeholders
27	CPD & Certification Policy	Professional development, certification	25	Academy, Instructors, Professionals

#	Policy Name	Focus	Pages	Key Stakeholders
28	Intellectual Property Policy	IP protection, copyright, trademarks	25	Legal, Technology, Academy

Phase 7 Total: 50 pages | Implementation Timeline: 3 weeks

PHASE 8: RESEARCH & ASSESSMENT POLICIES (2 Policies)

#	Policy Name	Focus	Pages	Key Stakeholders
29	Research Ethics Policy	Research oversight, ethics, consent	25	Research, Clinical, Legal
30	Assessment & Screening Disclaimer Policy	Assessment limitations, disclaimers	25	Clinical, Legal, Users

Phase 8 Total: 50 pages | Implementation Timeline: 3 weeks

PHASE 9: INTERNAL GOVERNANCE POLICIES (5 Policies)

#	Policy Name	Focus	Pages	Key Stakeholders
31	Staff Code of Conduct Policy	Professional conduct, ethics, discipline	20	HR, Legal, All Staff
32	Equity, Diversity & Inclusion (EDI) Policy	Diversity, inclusion, representation	20	HR, Leadership, All Staff
33	Anti-Oppression & Cultural Safety Policy	Anti-oppression, cultural safety	20	HR, Leadership, All Staff
34	Complaints & Dispute Resolution Policy	Complaint procedures, resolution	20	HR, Legal, All Stakeholders
35	Risk Management Policy	Risk identification, mitigation, monitoring	20	Leadership, Operations, All Staff

Phase 9 Total: 100 pages | Implementation Timeline: 6 weeks

Part 2: Cross-Reference Matrix

Policy Dependencies & Relationships

PHASE 1 (Core Legal)

- └ Provides foundation for all other policies
- └ Terms of Service (1) → Referenced by all policies
- └ Privacy Policy (2) → Referenced by all data-handling policies
- └ Consent Policy (3) → Referenced by clinical policies
- └ Accessibility Policy (5) → Referenced by all user-facing policies

PHASE 2 (Clinical)

- └ Depends on Phase 1 foundation
- └ Therapist Verification (6) → Supports Scope of Practice (7)
- └ Scope of Practice (7) → Informs Crisis Response (9)
- └ Telehealth Policy (8) → Supports Clinical Documentation (10)
- └ Crisis Response (9) → Informs Assessment Disclaimer (30)
- └ Clinical Documentation (10) → Supports Data Protection (13)
- └ AI Policy (11) → Informs Assessment Disclaimer (30)
- └ Postpartum Policy (12) → Specialized clinical service

PHASE 3 (Security)

- └ Depends on Phase 1 foundation
- └ Data Protection (13) → Supports Confidentiality (14)
- └ Data Protection (13) → Supports Retention (15)
- └ Confidentiality (14) → Supports all clinical policies
- └ Retention (15) → Supports Research Ethics (29)
- └ Incident Response (16) → Supports all policies

PHASE 4 (Community)

- └ Depends on Phase 1 foundation
- └ Community Guidelines (17) → Informs Content Moderation (18)
- └ Content Moderation (18) → Supports Community Guidelines (17)
- └ Volunteer Program (19) → Supports Peer Support (20)
- └ Peer Support Disclaimer (20) → Informs Assessment Disclaimer (30)

PHASE 5 (Corporate)

- └ Depends on Phase 1-3 foundation
- └ Institutional Data Access (21) → Informs Privacy Policy (2)
- └ Workplace Wellness (22) → Informs Confidentiality (14)
- └ Student Wellness (23) → Informs Crisis Response (9)

PHASE 6 (Billing)

- └ Depends on Phase 1 foundation
- └ Subscription & Billing (24) → Supports Refund Policy (26)

- └ Marketplace Payment (25) → Supports Refund Policy (26)
- └ Refund & Cancellation (26) → Implements Terms of Service (1)

PHASE 7 (Academy)

- └ Depends on Phase 1 foundation
- └ CPD & Certification (27) → Supports Therapist Verification (6)
- └ Intellectual Property (28) → Protects Academy content

PHASE 8 (Research)

- └ Depends on Phase 1-3 foundation
- └ Research Ethics (29) → Informs Data Protection (13)
- └ Assessment Disclaimer (30) → Informs Clinical Documentation (10)

PHASE 9 (Governance)

- └ Applies to all policies
- └ Staff Code of Conduct (31) → Applies to all staff
- └ EDI Policy (32) → Informs all policies
- └ Anti-Oppression (33) → Informs all policies
- └ Complaints & Dispute (34) → Applies to all policies

- └ Risk Management (35) → Applies to all policies

Part 3: Regulatory Compliance Mapping

PIPEDA (Personal Information Protection and Electronic Documents Act)

Policy	PIPEDA Requirement	Implementation
2 - Privacy	Consent, collection, use	Privacy Policy details
13 - Data Protection	Security, encryption	Data Protection Policy
14 - Confidentiality	Access control, confidentiality	Confidentiality Policy
15 - Retention	Data retention, deletion	Retention Policy
16 - Incident Response	Breach notification	Incident Response Policy

PHIPA (Personal Health Information Protection Act)

Policy	PHIPA Requirement	Implementation
2 - Privacy	Health info privacy, consent	Privacy Policy details
3 - Consent	Informed consent for health services	Consent Policy
9 - Crisis Response	Mandatory reporting, safety	Crisis Response Policy
13 - Data Protection	Health info security	Data Protection Policy
14 - Confidentiality	Health info confidentiality	Confidentiality Policy
16 - Incident Response	Breach notification	Incident Response Policy

Consumer Protection Act (Ontario)

Policy	CPA Requirement	Implementation
1 - Terms of Service	Clear terms, liability limits	Terms of Service
24 - Billing	Transparent billing, cancellation	Subscription & Billing
26 - Refunds	Refund rights, cancellation	Refund & Cancellation
30 - Assessment	Disclaimers, accuracy	Assessment Disclaimer

Employment Standards Act

Policy	ESA Requirement	Implementation
31 - Code of Conduct	Professional standards	Staff Code of Conduct
32 - EDI	Discrimination prevention	EDI Policy

Policy	ESA Requirement	Implementation
34 - Complaints	Complaint procedures	Complaints & Dispute

Human Rights Code

Policy	HRC Requirement	Implementation
32 - EDI	Discrimination prevention	EDI Policy
33 - Anti-Oppression	Anti-discrimination, cultural safety	Anti-Oppression Policy
34 - Complaints	Complaint procedures	Complaints & Dispute

Accessibility for Ontarians with Disabilities Act (AODA)

Policy	AODA Requirement	Implementation
5 - Accessibility	WCAG compliance, accommodations	Accessibility Policy
32 - EDI	Accessibility in hiring, services	EDI Policy

Occupational Health & Safety Act

Policy	OHSA Requirement	Implementation
31 - Code of Conduct	Workplace safety, conduct	Staff Code of Conduct
35 - Risk Management	Safety risk management	Risk Management Policy

Part 4: Implementation Roadmap

Phase-by-Phase Implementation Timeline

WEEK 1-4: PHASE 1 (Core Legal Foundation)

- Develop Terms of Service
- Develop Privacy Policy
- Develop Consent Policy
- Develop Cookie Policy
- Develop Accessibility Policy
- **Deliverable:** Core legal framework

WEEK 5-10: PHASE 2 (Clinical Services)

- Develop Therapist Verification
- Develop Scope of Practice
- Develop Telehealth Policy
- Develop Crisis Response
- Develop Clinical Documentation
- Develop AI Policy
- Develop Postpartum Policy
- **Deliverable:** Clinical service standards

WEEK 11-15: PHASE 3 (Security & Data)

- Develop Data Protection
- Develop Confidentiality
- Develop Retention
- Develop Incident Response
- **Deliverable:** Security framework

WEEK 16-19: PHASE 4 (Community)

- Develop Community Guidelines
- Develop Content Moderation
- Develop Volunteer Program
- Develop Peer Support Disclaimer
- **Deliverable:** Community governance

WEEK 20-23: PHASE 5 (Corporate)

- Develop Institutional Data Access
- Develop Workplace Wellness
- Develop Student Wellness
- **Deliverable:** Partnership framework

WEEK 24-27: PHASE 6 (Billing)

- Develop Subscription & Billing
- Develop Marketplace Payment
- Develop Refund & Cancellation
- **Deliverable:** Payment systems

WEEK 28-30: PHASE 7 (Academy)

- Develop CPD & Certification
- Develop Intellectual Property
- **Deliverable:** Academy framework

WEEK 31-33: PHASE 8 (Research)

- Develop Research Ethics
- Develop Assessment Disclaimer
- **Deliverable:** Research governance

WEEK 34-39: PHASE 9 (Governance)

- Develop Staff Code of Conduct
- Develop EDI Policy
- Develop Anti-Oppression Policy
- Develop Complaints & Dispute
- Develop Risk Management
- **Deliverable:** Internal governance

Total Implementation Timeline: 39 weeks (9 months)

Part 5: Stakeholder Responsibility Matrix

Who is Responsible for Each Policy?

Policy	Primary Owner	Key Stakeholders	Review Frequency
1 - Terms of Service	Legal	All departments	Annually
2 - Privacy	Privacy Officer	Legal, IT, All departments	Annually

Policy	Primary Owner	Key Stakeholders	Review Frequency
3 - Consent	Clinical Director	Legal, Clinical staff	Annually
4 - Cookie	Technology	Legal, Marketing	Annually
5 - Accessibility	Technology	Operations, Users	Annually
6 - Therapist Verification	Clinical Director	HR, Compliance	Quarterly
7 - Scope of Practice	Clinical Director	Legal, Therapists	Annually
8 - Telehealth	Clinical Director	Technology, Clinical staff	Annually
9 - Crisis Response	Clinical Director	Operations, Support	Quarterly
10 - Clinical Documentation	Clinical Director	Compliance, Clinical staff	Annually
11 - AI Policy	Technology	Clinical, Legal	Quarterly
12 - Postpartum Policy	Clinical Director	Therapists, Users	Annually
13 - Data Protection	CISO	Technology, Compliance	Quarterly
14 - Confidentiality	Privacy Officer	All staff	Annually
15 - Retention	Compliance Officer	IT, Legal	Annually
16 - Incident Response	CISO	Technology, Legal	Quarterly
17 - Community Guidelines	Community Manager	Moderation, Users	Quarterly
18 - Content Moderation	Community Manager	Legal, Community	Monthly
19 - Volunteer Program	HR	Operations, Volunteers	Annually

Policy	Primary Owner	Key Stakeholders	Review Frequency
20 - Peer Support Disclaimer	Clinical Director	Legal, Peer supporters	Annually
21 - Institutional Data Access	Partnerships	Legal, Compliance	Annually
22 - Workplace Wellness	Partnerships	HR, Employers	Annually
23 - Student Wellness	Partnerships	Clinical, Educational institutions	Annually
24 - Subscription & Billing	Finance	Operations, Users	Quarterly
25 - Marketplace Payment	Finance	Therapists, Operations	Quarterly
26 - Refund & Cancellation	Finance	Legal, Users	Quarterly
27 - CPD & Certification	Academy Director	Instructors, Professionals	Annually
28 - Intellectual Property	Legal	Technology, Academy	Annually
29 - Research Ethics	Research Director	Clinical, Researchers	Annually
30 - Assessment Disclaimer	Clinical Director	Legal, Users	Annually
31 - Staff Code of Conduct	HR Director	Legal, All staff	Annually
32 - EDI Policy	HR Director	Leadership, All staff	Annually
33 - Anti-Oppression	HR Director	Leadership, All staff	Annually
34 - Complaints & Dispute	HR Director	Legal, All stakeholders	Quarterly
35 - Risk Management	Chief Risk Officer	Leadership, All departments	Quarterly

Part 6: Key Integration Points

How Policies Work Together

User Journey Integration

1. New User Onboarding

- Accessibility Policy (5) → Ensures accessible signup
- Terms of Service (1) → User accepts terms
- Privacy Policy (2) → User understands data handling
- Consent Policy (3) → User provides informed consent
- Cookie Policy (4) → User controls cookies

2. Therapy Session Booking

- Therapist Verification (6) → User sees verified therapist
- Scope of Practice (7) → User understands service scope
- Telehealth Policy (8) → User understands virtual care
- Confidentiality Policy (14) → User understands privacy
- Subscription & Billing (24) → User understands costs

3. During Therapy Session

- Clinical Documentation (10) → Therapist documents session
- Data Protection (13) → Data is encrypted
- Confidentiality (14) → Privacy is protected
- Crisis Response (9) → If crisis, response procedures activated
- AI Policy (11) → If AI used, transparency ensured

4. After Therapy Session

- Clinical Documentation (10) → Session recorded
- Data Retention (15) → Data retained per policy
- Marketplace Payment (25) → Therapist paid
- Assessment Disclaimer (30) → If assessment used, disclaimer shown

Institutional Partnership Integration

1. Employer Partnership

- Institutional Data Access (21) → Data sharing agreement
- Workplace Wellness (22) → Program established
- Confidentiality (14) → Employee privacy protected
- Subscription & Billing (24) → Employer billing
- Complaints & Dispute (34) → Complaint procedures

2. Educational Institution Partnership

- Institutional Data Access (21) → Data sharing agreement
- Student Wellness (23) → Program established
- Crisis Response (9) → Student safety procedures
- Consent Policy (3) → Student consent obtained
- Complaints & Dispute (34) → Complaint procedures

Data Protection Integration

1. Data Collection

- Privacy Policy (2) → Defines what data collected
- Consent Policy (3) → Obtains consent
- Cookie Policy (4) → Discloses cookies
- Accessibility Policy (5) → Ensures accessible collection

2. Data Storage

- Data Protection (13) → Encryption and security
- Confidentiality (14) → Access control
- Retention (15) → Storage duration

3. Data Breach

- Incident Response (16) → Breach procedures
- Privacy Policy (2) → Breach notification
- Confidentiality (14) → Breach investigation
- Risk Management (35) → Risk assessment

Staff Management Integration

1. Hiring

- EDI Policy (32) → Diverse recruitment
- Anti-Oppression (33) → Inclusive hiring
- Therapist Verification (6) → Credential verification
- Staff Code of Conduct (31) → Conduct expectations

2. Onboarding

- Staff Code of Conduct (31) → Conduct training
- EDI Policy (32) → Diversity training
- Anti-Oppression (33) → Cultural safety training
- Confidentiality (14) → Privacy training
- Risk Management (35) → Risk awareness

3. Performance Management

- Staff Code of Conduct (31) → Conduct monitoring

- Complaints & Dispute (34) → Complaint procedures
 - Risk Management (35) → Risk monitoring
 - EDI Policy (32) → Inclusion monitoring
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Part 7: Compliance Checklist

Master Compliance Checklist

LEGAL COMPLIANCE

- ☐ All policies comply with PIPEDA
- ☐ All policies comply with PHIPA
- ☐ All policies comply with Consumer Protection Act
- ☐ All policies comply with Employment Standards Act
- ☐ All policies comply with Human Rights Code
- ☐ All policies comply with AODA
- ☐ All policies comply with OHSA
- ☐ All policies reviewed by legal counsel

POLICY COMPLETENESS

- ☐ All 35 policies developed
- ☐ All policies have implementation checklists
- ☐ All policies have compliance tracking
- ☐ All policies have review schedules
- ☐ All policies are accessible to stakeholders
- ☐ All policies are regularly reviewed

STAKEHOLDER ENGAGEMENT

- ☐ Policies communicated to all stakeholders
- ☐ Staff trained on policies
- ☐ Users informed of policies
- ☐ Partners understand policies
- ☐ Feedback gathered on policies
- ☐ Policies updated based on feedback

DOCUMENTATION

- ☐ All policies documented

- ☐ Implementation plans documented
- ☐ Compliance tracking documented
- ☐ Training materials developed
- ☐ FAQ developed
- ☐ Support procedures established

MONITORING & ENFORCEMENT

- ☐ Compliance monitoring procedures established
 - ☐ Violations tracked and reported
 - ☐ Corrective actions implemented
 - ☐ Regular audits conducted
 - ☐ Metrics tracked
 - ☐ Reports generated
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Part 8: Quick Reference Guide

Policy Selection by Stakeholder

For Users:

- Read: Terms of Service (1), Privacy Policy (2), Consent Policy (3)
- Review: Accessibility Policy (5), Assessment Disclaimer (30)
- Understand: Subscription & Billing (24), Refund & Cancellation (26)

For Therapists/Coaches:

- Read: Therapist Verification (6), Scope of Practice (7), Telehealth (8)
- Review: Clinical Documentation (10), Marketplace Payment (25)
- Understand: Crisis Response (9), AI Policy (11)

For Staff:

- Read: Staff Code of Conduct (31), EDI Policy (32), Anti-Oppression (33)
- Review: Confidentiality (14), Data Protection (13)
- Understand: Complaints & Dispute (34), Risk Management (35)

For Partners:

- Read: Institutional Data Access (21), Workplace Wellness (22), Student Wellness (23)
- Review: Privacy Policy (2), Confidentiality (14)

- Understand: Marketplace Payment (25), Complaints & Dispute (34)

For Leadership:

- Read: All policies
 - Focus: Risk Management (35), EDI Policy (32), Anti-Oppression (33)
 - Monitor: Compliance tracking, implementation progress
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Part 9: Next Steps

Implementation Priorities

IMMEDIATE (Week 1-2)

- 7 Establish policy governance structure
- 8 Assign policy owners and responsibilities
- 9 Create implementation timeline
- 10 Allocate resources

SHORT-TERM (Week 3-8)

- 11 Develop Phase 1 policies (Core Legal)
- 12 Develop Phase 2 policies (Clinical)
- 13 Conduct legal review
- 14 Begin staff training

MEDIUM-TERM (Week 9-26)

- 15 Develop Phase 3-6 policies
- 16 Implement policies across organization
- 17 Monitor compliance
- 18 Gather feedback

LONG-TERM (Week 27-39)

- 19 Develop Phase 7-9 policies
 - 20 Complete full implementation
 - 21 Conduct comprehensive audit
 - 22 Establish ongoing review cycle
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Conclusion

The CALMSHELL Master Policy Framework provides comprehensive governance for all aspects of CALMSHELL operations. By implementing these 35 policies in a coordinated, phased approach, CALMSHELL will establish a professional, compliant, and ethical organization that serves users, therapists, partners, and communities effectively.

This Master Integration Document serves as the roadmap for successful implementation. Regular review and updates will ensure policies remain current and effective.

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