

## **ACT Online Counselling Procedures for Individual Counselling**

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### **Introduction**

These procedures have been designed for ACT's Online Counselling service. Online counselling will be offered to current and new service users as an alternative service option while ACT's on-site services remain closed to the public.

Current service users can work with their counsellor to determine the best platform to continue their counselling. New service users will need to complete an Intake Assessment over the phone with a Service Access Coordinator or their counsellor, who will ask basic questions relating to online counselling to help determine which platform may be best. Once assigned to a counsellor, service users will be contacted to review informed consent over the phone and confirm the best platform for counselling. The counsellor will follow up via ACT email to confirm informed consent, provide any necessary links, and outline next steps. Counsellors should not provide online services without conducting an initial phone session.

## 1. Assessing Suitability for Online Counselling

Several factors need to be taken into account when determining the suitability of online counselling for a service user:

*Service user history:* For existing service users, counsellors should use existing knowledge to assist in determining if they are suited to online counselling.

*Motivation for seeking online counselling:* Motivation for seeking online counselling should align with and support the service user's goals for counselling and/or remove barriers to counselling.

*Literacy:* If using a text-based online counselling platform, service users need to be able to read, comprehend and express themselves in written English.

*Computer literacy/supportive internet use:* Service users will need to have basic understanding of how to operate a computer, navigate email, and communicate in a new online platform. While adjustment to a new platform is to be expected, the counsellor's role is not to fully orient service users to platform usage. Service users are expected to be able to register themselves online (if required) and navigate the platform independently. Service users who are confident using traditional email, Skype and social media sites such as Facebook likely have adequate levels of computer literacy.

There may be some situations in which being present online is detrimental to a service user or prevents them from achieving their counselling goals. Counsellors should ask service users if internet use has historically been problematic for them (i.e. over-use has negatively impacted mental health).

*Consistency with counselling goals:* Online counselling should support the service user's existing goals for counselling. For example, clients with social anxiety who have goals to navigate public spaces with greater comfort likely wouldn't be best supported by online counselling.

*Removing/Minimizing barriers:* One of the major goals of online counselling is to minimize or remove barriers to ACT's counselling services. Counsellors should consider if online counselling would remove or reduce barriers (i.e. continuity/accessibility of service), or if it would create more barriers (i.e. accessing private technology, writing skills).

*Crises:* Online counselling is not suitable for crisis/emergency support. Service users requiring crisis support will be provided the appropriate referrals.

## 2. Refusal/Limits of Services

Online counselling is not appropriate for every individual or topic. Counsellors are not required to offer or provide video or text-based counselling to an individual they believe would be better

served through phone counselling. Counsellors may work with the service user to determine how to best integrate online counselling sessions as a complement to phone sessions. Counsellors may also have service users return to phone or in-person appointments if needed. Counsellors and service users may also collaborate to identify specific topics or goals they wish to address online. ACT's existing policy on the [Refusal/Limits of Service](#) apply. Service users have a responsibility to be respectful and considerate in online interactions with staff as outlined in the Service User Rights and Responsibilities. While the decision to return to phone or in-person counselling can be made at the counsellor's discretion, any final decision to limit or refuse service is made by a Manager/Director based on the incident/circumstances related to this service user.

### **3. Intake & Registration**

New service users will complete an OCASE Intake and basic assessment for phone and online service options over the phone with one of ACT's Service Access Coordinators or a Counsellor. This will include recording the service user's legal name, year of birth, Toronto postal code, contact information, and confirmation that they are a member of one of ACT's priority populations. If the intake is completed by a Service Access Coordinator, relevant information will be entered into the Counselling Referral Spreadsheet and a Counsellor will be expected to follow-up with the service user. After completing the intake process, the Service Access Coordinator/Counsellor will send a confirmation e-mail to the service user confirming their registration, correct information, Toronto residency, and whether or not they have consented to have their personal information recorded in OCASE. This email will request that service users reply with confirmation.

For service users who did consent to have their personal information recorded in OCASE, their response confirming their information can be saved as a PDF and uploaded as an attachment to their OCASE Agency Intake service file. For those who did not consent, their name should be anonymized using the OCASE pseudonym formula. Their confirmation email cannot be uploaded to OCASE—instead, their Intake Service Record should detail the circumstances surrounding physical distancing, lack of OCASE consent, and confirmed identity (full statement [here](#)). Their name and email should still be recorded in the Counselling Referral Spreadsheet so counsellors can follow-up with them, All confirmation emails should be deleted once the appropriate information is documented in OCASE.

Existing service users seeking online counselling will have already gone through the OCASE consent process (either giving or not giving consent) and should have a completed intake document in OCASE. Counsellors still must discuss online counselling and review information in ACT's Online Counselling Client Consent form prior to having the service user engage in online counselling. Counsellors should refer to the Online Counselling Checklist to ensure all necessary information is included. Counsellors should follow the same procedures outlined above to obtain and document informed consent.

By the end of the intake/assessment session, the counsellor and service user should determine whether they will be using phone, video (Zoom), synchronous text (Live Chat) or asynchronous text (Private Conversations) communication. If using PrivacEmail for text-based counselling, it is suggested that only one method of communication be used (Live Chat or Private Conversations) in order to maintain boundaries and avoid confusion. Which method is used can be changed if determined appropriate by the counsellor and service user.

To begin phone counselling, service users only need to provide their counsellor with their current phone number. Counsellors should also confirm if they can leave messages at this number. It should also be determined if the counsellor will call the service user or vice versa. For video counselling through Zoom, service users need to provide their counsellor with a valid email address. Service users do not need to create a Zoom account to join Zoom sessions hosted by their counsellor. For text-based online counselling, service users will have to register themselves in the PrivacEmail system. This registration process requires service users create a user name and password, select a security question, and enter the following information:

- a valid email address and phone number (can be ACT's phone number)
- their city of residence
- first and last name

In addition, the registration process also requires service users to agree to the PrivacEmail Terms of Service and ACT's Online Counselling Client Consent form. Service users must also enter their counsellor's name so that the Intake Worker can assign them to the appropriate counsellor.

Service users who wish to have their information anonymized within the PrivacEmail system can use their OCASE pseudonym as their username. They may also enter their OCASE pseudonym for the first and last name requirements. Counsellors should provide their service users with a written copy of their pseudonym prior to registration, as well as the link for registration. Service users can also enter ACT's phone number if they do not want to record their phone number in PrivacEmail.

Once service users have registered with PrivacEmail, a confidential email notification will be sent to the Intake Worker's account (currently ACT's Research & Program Development Coordinator, Sarah Lindsay). While unassigned the Intake Worker will be able to view all the information provided in registration. Once the service user is assigned to the counsellor they indicated, the Intake worker will no longer have access to any information other than which counsellor the service user was assigned to. Once the service user is assigned, the Intake Worker will inform the counsellor that they have a new client in PrivacEmail through regular email. If using Private Conversations, counsellors should send the initial message to the service user in PrivacEmail. The exact contents of initial messages are at the discretion of individual counsellors, however they may include a brief welcome and invitation to explore the PrivacEmail platform, an overview of how to communicate online, when to send a response by, etc. If using Live Chat, PrivacEmail requires counsellors to send the first message,

#### **4. Emergency Planning**

The distant nature of online counselling requires additional preparation to ensure service user's needs are responded to. Prior to beginning online work, counsellors and service users should identify a back-up method of communication (such as a phone call) and protocols for their use (i.e. missed appointment). Service users should also be made aware of the crisis/emergency supports list posted on the PrivacEmail site. These resources should also be shared with service users accessing video or phone counselling if needed. It may be beneficial for counsellors to support service users in identifying other potential sources of support in their lives.

## **5. Online Sessions & Appointment Structure**

Counsellors should treat online sessions as similarly to in-person sessions as possible. Phone, video and synchronous chat sessions should be held in a private space. These forms of online counselling all maintain the same appointment structure as in-person services: the counsellor and service user meet virtually at an agreed upon time for an appointment of 50-60 minutes. It is up to each counsellor to clarify their late/missed appointment process for phone, video, and synchronous chat and communicate this clearly to their service users during their initial phone assessment and in their follow-up confirmation email.

For asynchronous communication, adequate time and private space should be allocated to read and respond to the service user's message (50 minutes) and complete subsequent case notes. The time dedicated to responding to the service user will be considered their appointment time. This is the only time counsellors are required to check the service user's PrivacEmail file. Service users must send their message to their counsellor by their appointment time, and can expect a response from their counsellor by the end of their appointment time. For example: if the appointment is set for 11:00am on Tuesday, the service user will have to send their message to their counsellor by this time and can expect a response by 12:00pm Tuesday.

- Service users have ample time to respond to their counsellor's message in asynchronous communication. As such, ACT will not offer make-up appointments for missed appointments of this nature. If a service user ends their message to their counsellor after the scheduled appointment time, it will be considered a missed appointment. Missed online appointments may be included in the session limit for time limited services per counsellor discretion. If a service user misses an online appointment and does not connect with their counsellor, the counsellor should reach out through phone or regular email within a reasonable time frame, usually within 24 business-day hours.
- Counsellors are not expected to respond to two sessions worth of content in a single response. However, they may choose to respond to bigger themes or issues in the messages. In these situations counsellors should indicate how they approached their response to the service user at the beginning of their message. Counsellors should do the same for service users who send multiple messages between sessions. Service users are encouraged to limit themselves to a single response for each session.

If either the service user or the counsellor needs to cancel or reschedule an appointment, they should do so over the phone or regular email. Neither PrivacEmail nor Zoom should not be used to book, cancel, or reschedule appointments.

## **6. Recording Requirements and Guidelines**

Using a text-based platform to provide online counselling automatically generates transcripts of any online sessions. These transcripts are not to be used to replace any existing recording requirements or guidelines. Counsellors are still required to create an OCASE Service Record and case notes for each online session as they would for in-person sessions, in accordance with ACT's recording policies and procedures and those of the given regulatory or professional body counsellors belong to. Standard recording requirements also apply to sessions held via video or over the phone. OCASE Service Records should indicate if the session was online or in person.

For video session carried out on the Zoom for Telehealth platform, the counsellor will disable the recording feature so sessions cannot be recorded by either the counsellor or the service user. Transcripts of chats on Zoom for Telehealth will not be archived by counsellors.

## **7. Service Users Actively Using Substances**

As with all of ACT's services, online counselling is not contingent on abstinence from substance use. Counsellors and service users who are using substances should collaboratively determine the best way to use online counselling to meet their needs. For example if a service user typically only uses substances at night, they may decide with their counsellor that it is best for them to work on and send their responses in the morning.

In situations where service users send messages in PrivacEmail to their counsellor while actively using or are intoxicated during a session, counsellors should use their professional discretion in how they respond. In text-based counselling they may for example address the nature and context of the message (especially long, paranoid, etc.) rather than address the content of the message in-depth.

For phone or video counselling, service users will be asked to refrain from taking substances during or immediately before a session as it may impede the therapeutic process.

## **8. Suicidal Service Users**

Online counselling is not appropriate for crisis response, including addressing the needs of actively suicidal service users. While ACT does not promote services for crisis response in-person or online, service users may still express suicidal thoughts in an online setting.

When responding to expressions of suicidality in a text-based session, counsellors should use their judgement to determine if they need to contact their service user by phone. Should this be

the case, or should this be the case during a video counselling session, counsellors should follow ACT procedures for Suicidal Service Users.

## **9. Changing Platforms & Returning to In-person Sessions**

There may be situations in which service users originally thought to be well suited to a particular online counselling platform may not be. For example, if a service user consistently sends multiple, late, or especially lengthy responses after having reviewed the expectations and limits of asynchronous online work with their counsellor, this may not be the best way to meet their needs. Counsellors should address these issues with the service user and review alternative online platforms.

Upon the re-opening of ACT's offices, counsellors may wish to offer in-person services. Counsellors may use their discretion based on what they believe will best meet the needs of the service user.

## **10. Addressing Technical Issues**

Counsellors using PrivacEmail should note any technical issues with the system that they or their service users experience and forward this information to either their Manager or the individual managing ACT's administrative account in PrivacEmail. This individual can reset user passwords should someone be locked out of their account. Broader technical issues will be brought to the Website Technician at PrivacEmail, through ACT's administrative account. In the event of significant technical issues, counsellors will be asked to contact affected service users to reschedule appointments or conduct scheduled appointments in person.

Counsellors will not be expected to troubleshoot technical issues with their service users. However, counsellors should provide service users with a brief overview of the chosen platform (PrivacEmail or Zoom). Those using the PrivacEmail system may direct service users to the "Using Private Conversations" video and Chat FAQ in the PrivacEmail site. Service Users are expected to familiarize themselves with the platform and be comfortable using computers to communicate. In the event that a service user is experiencing technical issues with their own device or internet connection and will not be able to attend their session by their allotted appointment time, service users should inform their counsellor prior to their appointment time, or as soon as possible. Counsellors should do the same for service users should they be experiencing technical difficulties.

## **11. Service User Complaints**

ACT's existing policy for addressing service user complaints applies to online counselling. If service users have a complaint about their counsellor, they should connect with the counsellor's Manager through ACT's existing complaint process. Specific complaints or feedback regarding the Zoom platform can be brought to counsellors' attention and incorporated into the evaluation of the program. Specific complaints or feedback regarding the PrivacEmail platform can be directed or forwarded to the PrivacEmail Intake Worker, ACT's Research & Program Development Coordinator. When appropriate these complaints will be sent to PrivacEmail.

Otherwise, complaints regarding online counselling will be incorporated into evaluation of the program.

## **12. Disclosure/Release of Information to Others**

Should session transcripts or any portion of session transcripts be released for the purposes of clinical supervision or case consultation, all identifying information must be removed.

In the event a counsellor needs to reassign a service user to another counsellor on staff, they will need to acquire service user consent to transfer the service user's account to the new counsellor complete with existing transcripts. If the client does not consent to their transcripts being released to their new counsellor, they will need to create a new account in PrivacEmail.

## **13. Internal Referrals & Case Coordination**

For service users with complex needs, case coordination may be appropriate. PrivacEmail transcripts should not be included in any coordination activities for service users accessing online counselling. Communication, information sharing and collaboration between staff regularly serving the service user should occur as it would for any service user accessing in-person services. Any confidential, identifying or otherwise sensitive information should be shared over the phone rather than through standard e-mail for case coordination purposes.

## **14. Closing Service User's PrivacEmail Account**

Service users will have access to their PrivacEmail account so long as they are actively involved in online counselling. When a service user ends counselling, they will continue to have access to their account for one week, during which time they may choose to download their transcripts, or other information provided during the course of counselling. After this one-week period, The PrivacEmail Intake worker, ACT's Research & Program Development Coordinator, Sarah Lindsay, will change the service users account to "Inactive" and the service user will no longer have access to their PrivacEmail account. Counsellors should inform service users of this time frame and inform the administrative account holder when a service user's account needs to be made inactive. Service users who contact their counsellor after this one-week time frame and wish to download their transcripts can temporarily have their account made active again.

## **15. Security of Service User Transcripts and Account Information**

ACT and PrivacEmail have implemented various safe guards to protect service user account information, transcripts and any identifying information. PrivacEmail uses industry standard Secure Socket Layer (SSL) encryption. All data stored on PrivacEmail databased is encrypted. Zoom for Telehealth protects data in transit using 256-bit Advanced Encryption Standard (256-AES). The servers ACT uses are firewall protected and encrypts all stored data. ACT's systems ensure that only encrypted transmissions are allowed to communicate within the Internet systems owned and/or operated by ACT.

In order to maintain the security of service user transcripts and account information, counsellors are expected to create a secure password for their account and to keep their login information private. Counsellors may conduct online sessions off-site if needed. Ideally counsellors working



off-site access PrivacEmail through an ACT laptop or a personal private computer. If this is not possible, counsellors must delete their browser history after using PrivacEmail. Counsellors should not save their login information to their browser. Counsellors working off site should ensure they are working in a private space where their screen is not visible to others and where applicable headphones are used and reasonable effort is made to prevent being overheard.

Service Users are responsible for maintaining the privacy of their own information while it is under their control. Service users must not share their login information, and wherever possible must use a secure and private internet connection. Counsellors should encourage service users to delete their browser history when using a shared computer, and to password protect any device/accounts they use to access PrivacEmail or Zoom, where possible. Service users are responsible for maintaining the privacy of any materials they download from PrivacEmail or Zoom for Telehealth.

## 16. Summary of Key Tasks

1. For new Service users: intake and basic assessment completed by Service Access Coordinator or Counsellor
  - a. Service Access Coordinator/Counsellor completes Agency Intake File in OCASE, Assessment of Online or Phone Service Options and refers service user to appropriate counsellor, including basic assessment of online counselling needs/capacity
2. Assess suitability for online counselling via phone follow-up
  - a. Determine best platform for online counselling: phone, video, synchronous or asynchronous
3. Review procedures and expectations for online counselling
  - a. Scheduling appointments, appointment structure/frequency of contact & late/missed appointments policy
  - b. Platform overview & features
  - c. *Text-based only*: techniques to enhance communication online
4. Obtain and document informed consent (refer to Introduction to Online Counselling checklist).
  - a. This process will take place over the phone. Counsellors will then follow up with an email outlining the counselling platform and process and requesting email confirmation of consent to receive services via online platforms or phone.
  - b. If the service user has consented to have personal information record into OCASE, this email can be saved as a pdf and uploaded into their OCASE Agency Intake service file as an attachment. If the service user has not consented to have their personal information recorded into OCASE, include a note in their service record that consent was provided verbally. The email conversation should be deleted once consent has been documented.

For Video Counselling (Zoom):

5. Counsellor will carry out an initial phone assessment and overview of video counselling using the Zoom for Telehealth platform.

- a. Confirm that the service user can access Zoom in a private space
  - b. Confirm that the service user can call-in to the Zoom session if their Wi-Fi connection is unstable
  - c. Confirm that the service user has earphones with a microphone
  - d. Request that service users download the Zoom app and test Zoom prior to their appointment
6. Confirm back-up method of communication and schedule next appointment
  7. The counsellor will send a follow-up email to the service user detailing their discussion and seeking confirmation of consent to receive services via the Zoom for Telehealth platform. The confirmation email should be saved as a pdf and uploaded into their OCASE counselling service file as an attachment. If the service user has not consented to have their personal information recorded into OCASE, include a note in their service record that consent was provided verbally. The email conversation should be deleted once consent has been documented.

This email should also include instructions to test Zoom, the link to the Zoom meeting and the meeting details (ID, password, date/time)

#### For Phone Counselling:

5. Confirm phone number and current email address
6. Review methods for maintaining confidentiality during a session, highlighting the importance of access to private, uninterrupted space
  - a. Confirm whether or not messages can be left at the phone number provided
7. Clarify if the counsellor calls the service user or vice versa
8. Send date and time of next appointment
9. Send confirmation email detailing appointment information and basic telephone procedures, including late/missed appointment policy

#### For Text-Based Counselling (PrivacEmail):

5. Review PrivacEmail registration process
  - a. Provide link to website address (and OCASE pseudonym if required).
  - b. If appropriate request that the service user register within a specific time frame
  - c. Instruct service users to only list counsellor name in 'Concerns' section of registration process
6. Intake worker will receive a registration notification and assign the service user to the counsellor as indicated in their registration
  - a. Intake worker will inform counsellors when a new client is assigned to them in the system
7. Counsellor will send the first message once the client is registered
8. Schedule/cancel all appointments over the phone or through regular email (if the service user consents to doing so with the understanding that this is insecure)
9. For asynchronous counselling, counsellor schedules 50 minute appointments to read and respond to service user messages

10. For Live Chat synchronous counselling, counsellor schedules 50 minute appointments for sessions with the service user.

#### Documentation & Ending Online Counselling in PrivacEmail

11. Create an OCASE Service Record) and complete case notes for each session
  - a. Document which platform was used (phone, Zoom, Live Chat on PrivacEmail or Private Conversations on PrivacEmail)
12. Standard e-mails that are administrative in nature (i.e. appointment booking) should only be kept by the counsellor as long as they are relevant and then promptly deleted (i.e. once an appointment has taken place, the e-mail confirming/scheduling the appointment should be deleted)
  - a. E-mails containing clinical or identifying information should be saved as a PDF to a confidential folder in the ACT shared drive and then promptly deleted
13. When a service user wants to end online counselling in PrivacEmail, inform them that their account will be available to them for an additional week. After this point, their account will be made inactive by ACT's PrivacEmail Intake Worker and they will no longer have access to their account.
  - a. If a service user requests access to their transcripts after this one-week period, ACT's PrivacEmail Intake/Admin Worker can temporarily make their account active again.
14. Inform ACT's PrivacEmail Intake Worker the service user's account should be made inactive and anonymized (if applicable)