



College of
Registered
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of Ontario

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Electronic Practice Guideline

Introduction

The Electronic Practice Guideline provides additional information that may be helpful to registrants who currently provide, or who are considering providing psychotherapy services or clinical supervision using electronic communications technologies.

Registrants may rely on electronic communications technologies for a variety of purposes, for example, to set appointments, to relay information or check in with clients between sessions, as a means to engage with a client in the therapeutic process, or for record-keeping.

Though the principles of this Guideline will apply in any interaction with a client that is mediated by communications technology, even those that are administrative in nature (e.g. booking appointments), this guideline particularly applies in situations where a registrant is using electronic communications technology to engage with a client in the therapeutic process.

Regardless of the format (e.g. face-to-face, phone, videoconference) in which a registrant practises, CRPO's [Regulations](#), [Code of Ethics](#) and [Professional Practice Standards](#) continue to apply.

Applicable Standard

This guideline complements Professional Practice Standard 3.4: Electronic Practice. Registrants are encouraged to review the Guideline and Standard together.

As the [Personal Health Information Protection Act \(PHIPA\)](#) sets health care providers' obligations for the collection, use and disclosure of client personal health information, CRPO urges registrants to become familiar with the Act. This can be accomplished by reviewing the Act itself, or by accessing one of the many resources available, including those developed by the Information and Privacy Commissioner [of Ontario](#).

Definitions

Electronic Practice: Providing assessment or treatment to a client by means of communication technology, e.g., telephone, text, email, video-calling.

Acceptable Communication Technologies and Software

Registrants may use communications technologies provided they are able to do so in accordance with law, regulations and the Professional Practice Standards for Registered Psychotherapists. Communication technologies include platforms for conducting therapy, storage for clinical notes, and client-facing apps, among others.

Further guidance can be found in CRPO's Guideline on How to Select a Communications Platform for [Electronic Practice](#).

Communications technologies employed by registrants of CRPO must conform to their duty to safeguard the personal health information of clients, and registrants' use of communications technology must comply with *PHIPA*. Other considerations in selecting a platform may include the appropriateness of the technology in light of client safety and the services that will be provided.

Considerations and challenges presented by the communications technology must be addressed by the registrant to ensure that the technology can be used reliably and effectively.

Confidentiality

CRPO's Professional Practice Standards recognize confidentiality as a cornerstone of the psychotherapy profession. A client's right to confidentiality is also set out in law. According to section 12(1) of *PHIPA*, registrants who have access to or control over client personal health information must take reasonable measures to safeguard the information, protecting it against theft, loss and unauthorized use, disclosure, copying, modification or disposal.

Personal health information is transferred almost any time a registrant communicates with a client using communications technology, including when appointments are booked, during sessions, at time of payment and during check-ins that may occur between sessions. Using technologies and/or devices that provide encryption, require a password, or which possess other features designed to prevent data loss, unauthorized use and access are examples of reasonable measures a registrant can employ to safeguard the confidentiality of client information. For more specific examples, please see the [Electronic Security Practices Self-Assessment](#).

Competence

In consideration of the distinct therapeutic milieu that electronic practice presents, registrants must possess the array of competencies that are necessary to engage clients in a safe, effective therapeutic process, including at intake and when services are discontinued. Before engaging any client in therapy, the registrant must be sufficiently capable of using the particular communication technology such that the registrant is able to:

- Recognize the potential impacts of the use of the technology with regard to the client-therapist relationship and the therapeutic process;
- Recognize the limitations of confidentiality presented by the platform;
- Identify how platform users can protect their personal health information;
- Develop an effective contingency plan to address instances of technical failure; and

- Troubleshoot common issues that might arise.

Before engaging clients in therapy via communications technology, registrants should consider receiving training and/or clinical supervision in this area of practice. Refer to Standard 2.1: Seeking Consultation, Clinical Supervision, and Referral for more information about when clinical supervision should be sought.

Appropriateness

Therapy must have a reasonable prospect of benefit to the client, according to Standard 3.5: Unnecessary Treatment.

Situations to consider when evaluating electronic practice for appropriateness may include:

- A client is showing severe cognitive symptoms, such as loss of contact with reality (psychosis);
- Where there is a risk of adverse reaction during treatment, such as a panic attack;
- Where there is a risk of harm to self or others; and
- Impacts of trauma the client has experienced.

In such situations, alternate options may be more appropriate, for example, offering services in another format (e.g., face-to-face) and/or referral to other services, such as those located near the client.

Before commencing therapy, a registrant's initial assessment should also consider whether it is appropriate to engage the client in a form of therapy that would be conducted primarily through communications technology. Factors that may be relevant to this assessment process include:

- The nature of the therapeutic relationship;
- The nature of the client's concerns;
- Anticipated shifts in the depth or focus of the therapy;
- The client's ability to access the technology reliably and in a safe, private setting;
- The client's overall capabilities, comfort and familiarity with the technology;
- The client's capacity to participate; and
- Access to local supports.

Throughout the therapeutic process, registrants should continue to evaluate the effectiveness of the therapy, taking into consideration the impact of the technology on the therapeutic process and the client's progress. The factors listed above may be relevant to this evaluation process. If there is reason to believe that the use of communications technology is no longer effective or appropriate, it will be important to understand why, and what actions would be appropriate given the circumstances. Such actions could include engaging in clinical supervision, linking the client to local resources, encouraging the client to attend a face-to-face session (if possible), referring the client to another therapist, among other things.

Informed Consent

Registrants may provide professional services (i.e. assessment and treatment) using communications technology with the prior consent of the client, as described in Standard 3.4.2. Registrants must provide information about the technology that will be employed in the course of the therapeutic relationship, in particular, potential risks associated with the technology.

Part of the informed consent discussion will address the collection, use and disclosure of a client's personal health information. This is an opportunity to describe record-keeping practices in the context of electronic practice. For example, clients may be interested to know whether email communications are stored separately or in the clinical record, or whether sessions can be recorded. Consider these matters carefully, as emails and recordings effectively serve as transcripts of the therapy.

Below are examples of potential risks associated with use of electronic communications technology:

- Failure to meet professional obligations with respect to confidentiality in situations where the therapist knows or ought to know that the client would be unable to secure a sufficiently private location in which to engage in therapy;
- Inadvertent disclosure of client personal health information due to errors in the recipient's email address/phone number;
- Recording of sessions without consent of the therapist or the client; and
- Improper storage and destruction of session recordings.

See Standard 3.2: Consent for more information regarding the details that must be included in the informed consent discussion.

Recording Sessions

Recording of sessions may occur for purposes of supervision or to provide a complete transcript of a session.

Therapists are encouraged to take extra care in their informed consent processes if it is proposed by the client or the therapist that a session be recorded. Informed consent should include the purpose of the recording (supervision or for clinical record-keeping), storage and security, transmission, retrieval, and deletion and destruction protocols.

Contract

According to Standard 3.4: Electronic Practice, registrants are required to enter into a contract with a client before providing services via communications technology. While the Standard does not specify that this contract must be in writing, registrants are encouraged to establish a written agreement with the client. Where no written contract exists, communications with the client regarding terms for services provided via electronic communications technology must be documented in the clinical record. In addition to information ordinarily provided to clients, registrants should also address:

- The particular technology or platform that will be used;
- Risks or benefits associated with the technology, including the limitations of the technology;
- Steps to be taken in the event of a technology disruption or when a client is in crisis;
- Therapist's responsibility to maintain confidentiality, and measures that are employed to preserve confidentiality, and limitations to confidentiality;
- Measures a client can employ to protect their privacy and personal health information;
- Practice policies relevant to electronic practice (e.g. payment methods, appointment cancellations, disruption in services);
- The therapist's usual hours of work and average response times to between-session communications from clients; and
- That the registrant is a regulated health professional in Ontario, and that CRPO is the organization that sets the rules for and considers complaints about registered psychotherapists.

Professional Liability Insurance

As described in Standard 3.4: Electronic Practice, registrants must ensure that their professional liability insurance covers electronic practice.

Supervision

Clinical supervision may be conducted using electronic means, in-person, or a combination of the two. Standard 4.1: Providing Clinical Supervision allows for clinical supervision to occur in whatever format is best suited to the supervisor and supervisee, provided it is described in the clinical supervision agreement.

AI and Generative Software

While AI and other generative software offer opportunities for efficiency, they are also accompanied by a host of risks. Specific risks are outlined here in a [Practice Matters article](#).

Under Standard 3.4: Electronic Practice, registrants are prohibited from using information obtained from computer-generated assessments, reports, or statements without exercising their own professional judgment. This means that any generative content must be thoroughly reviewed by the registrant to ensure accuracy prior to use.

Services where a client is located in another jurisdiction

In addition to abiding by the laws of Ontario and the Standards set by CRPO, a registrant who provides services to a client in another jurisdiction should become familiar with relevant laws of the jurisdiction(s) in which the services are provided, which is generally determined by the location of the client.

If providing services to clients who are located in another jurisdiction (e.g. in another province or country), registrants must ensure insurance coverage will apply.

Registrants can learn more about specific situations by using the [Cross-Border Therapy Tool](#).

Operating within an ethical framework

While developments in technology create new opportunities for practice, they also present new clinical, legal, and practical challenges. Registrants who engage in electronic practice should be aware that they may face situations where there is no clear course of action. When faced with such situations, registrants are advised to operate within an ethical decision-making framework, relying on their professional judgment to identify reliable sources of information and an appropriate course of action.

Note:

Guidelines published by CRPO are intended to clarify CRPO's Professional Practice Standards, providing additional information that will help registrants consider or respond to common situations that arise in practice in a manner that accords with the Standards. Information provided in a guideline is to be considered along with other relevant sources of information, such as the Code of Ethics, applicable Standards, regulations, and laws.

Registrants must rely on their knowledge, skill, and judgment to determine when it is appropriate to apply a particular guideline, being mindful that ultimately, registrants are responsible for their own actions.

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