

Montreal  
Indigenous  
Community



# Internal policy and general procedure

Mental Health Program



# Internal policy and general procedure Mental Health Program

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Montreal Indigenous Community NETWORK

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# Introduction

## Presentation of the Mental Health Program

During the pandemic, the Montreal Indigenous Community NETWORK (the NETWORK) observed an increase in psychological distress among front-line workers serving Indigenous populations. In response, the NETWORK secured funding to provide a mental health support service, offering therapy sessions to over front-line workers. We were also able to secure funds to continue the program.

## Objective of the Policy

This policy provides the necessary information in the event of dissatisfaction with the services received from the "Mental Health Program", in the event of renewal of therapy sessions and in relation to the confidentiality of information on referred individuals.

## Scope

This policy applies to caregivers, referred individuals and the coordination of the Mental Health Program.

# Services Offered

Through the Mental Health Program, referred individuals can access a variety of professionals and practices that promote psychological well-being, including:

- Psychologists, psychotherapists, counselors;
- Art therapists, drama therapists, music therapists, naturopaths;
- Elders and Knowledge Keepers (for Indigenous only).
- Group therapies;
- Eye Movement Desensitization and Reprocessing therapy (EMDR).

Below are the services that may be covered specifically for Indigenous individuals:

- Sweat lodge ceremonies;

- Traditional healing sessions;
- Wellness workshops led by an Indigenous person;
- Traditional medicines;
- Indigenous arts and crafts (beading circle, drum building);
- Cultural retreats.

Please note that therapy sessions and cultural activities are both part of the same program offering. Participants may choose one path or the other, but cannot access both simultaneously. Cultural activities are reserved for Indigenous participants and represent a separate stream within the program, rather than an add-on to clinical services.

## 1. Eligibility criteria

This program is available to anyone working directly with Indigenous people. You are eligible whether you are Indigenous or non-Indigenous, as long as you work on the front lines:

- Either for an Indigenous organization,
- Or for an organization that provides services specifically to Indigenous communities in Tiohtià:ke/Montréal.

### 1.1 Eligibility of Organizations

#### a. Indigenous Organizations

The NETWORK defines an “Indigenous Organization” as an organization that meets the following criteria:

- The organization was founded by an Indigenous person or group;
- The organization is led by Indigenous people; more than 50% of the decision makers must be Indigenous (Board of Directors, Steering Committee, Director or other decision-making positions);
- The organization is made up of Indigenous people, with a minimum of 50% of its employees being Indigenous (this criterion does not apply to organizations with fewer than five employees);

- More than 50% of the organization's members and beneficiaries are Indigenous.

#### **b. Indigenous-Serving Organizations**

The NETWORK defines an “Indigenous-serving organization” as an organization that has 30% or more of its clientele from Indigenous communities and has a program that specifically and directly serves Indigenous people.

## **1.2 Eligibility of referred individuals**

An automatic assessment of eligibility will be carried out by the program coordinator for each new request for access to the program. This initial check will be followed by quarterly checks using the list of employees transmitted and updated by eligible organizations.

Eligibility will be determined in one of three ways, depending on the applicant's situation:

- **List of employees:** This list includes last name, first name, start and end dates of employment, if applicable, and the name of the organization. It is strictly confidential and accessible only by the program's staff and the eligible organization.
- **Human Resources:** If security considerations prevent the organization from displaying the names of its employees, the applicant must provide a letter of employment confirmation from their organization's human resources department,
- **Pay stub:** If the applicant prefers not to inform their human resources department of their participation in the program, they must provide us with their most recent pay stub.

### **1.2.1 Exception**

As part of reintegration or social participation programs, organizations sometimes offer part-time roles or mandates that help individuals reconnect with community life and develop new skills.

While these individuals are not considered frontline workers, they support existing teams in delivering cultural and social activities or sharing circles.

Given their active involvement within these teams, they are eligible for the mental health program for the duration of their work contract.

### **1.3 Eligibility of Caregivers**

To ensure that referred individuals have access to quality, culturally safe mental health care, we base the recruitment of caregivers on the following criteria:

- Be a member in good standing of their professional order or association (for psychotherapists, psychologists, counselors, art therapists, etc);
- Have experience working with Indigenous people or demonstrate sensitivity to their realities, as well as a commitment to continuing to learn, particularly through training and/or clinical supervision.
- Specialization in the type of support sought by referred individuals (stress, burnout, anxiety, bereavement, sexual abuse, harm reduction, EMDR, etc.).
- Be recommended by other collaborators,
- Be already affiliated with [Non-Insured Health Benefits for First Nations and Inuit](#) or being willing to register.
- The ability to bill insurance companies directly is an asset.

## **2. Responsibilities**

### **2.1 The NETWORK's Responsibilities**

- The NETWORK is committed to maintaining prompt and transparent communication with caregivers by email and phone, as well as providing them with ongoing support.

- The NETWORK ensures that each referred participant is matched with a caregiver based on available resources, and that participants are informed of any delays, such as wait times.
- The NETWORK is committed to referring participants to caregivers who are well regarded in the Tiohtià:ke community and recognized as culturally safe for Indigenous people, cultural minorities, and 2SLGBTQIA+ individuals.
- The NETWORK conducts quarterly eligibility verifications for all referred participants.
- The NETWORK commits to processing payments for completed sessions within two to three weeks, including sessions that do not meet the caregiver's cancellation policy.
- The NETWORK is committed to offering a diverse range of expertise, including Elders, Knowledge Keepers, Traditional Healers, art therapists, social workers, psychologists, somatic therapists, music therapists, EMDR therapists, and more.

## **2.2 Responsibilities of Participating Organizations**

Once one or more employees of an organization benefit from the NETWORK's Mental Health Program, the organization becomes a participating organization. As part of this partnership, and to ensure the smooth running of the Mental Health Program, it is important to highlight the following responsibilities of partner organizations:

- Organizations commit to keeping their employee lists up to date on a quarterly basis. This is essential to ensure the accuracy of records and the continued eligibility of their employees for the mental health program.
- Organizations also commit to informing the NETWORK of:
  - Any updates,
  - Any delays in providing those updates,
  - Any inability to fulfill this requirement.
- When an organization is unable to meet the NETWORK's requests due to security concerns or other constraints, it is expected to propose alternative solutions or to consider the options offered by the NETWORK to address these challenges.

We value the collaboration of each participating organization and are dedicated to working together in the best interest of their employees' well-being. Your active

engagement in this process is essential to the success of the program and the well-being of referred participants.

## 2.3 Responsibilities of Caregivers

Each caregiver adheres to the declaration of services provided by the program coordinator and guarantees to provide compassionate, culturally respectful, and attentive support in compliance with applicable laws. Caregivers also guarantee to respect the confidentiality of those referred to them by the NETWORK, and to provide a culturally safe environment. If needed, the NETWORK has developed a [Decolonial Toolbox](#) and an [Ally Toolkit](#) , which can be shared with caregivers who are less aware of Indigenous realities. The aim is to provide resources, food for thought and help non-Indigenous people understand the complexity of decolonization, so they can become better allies.

### Caregivers Also Commit to:

- Ensure that any rescheduled sessions take place before the end of the fiscal year, ideally by March 31 of each year;
- Report any concerns, incidents, or repeated last-minute cancellations to the mental health program coordination;
- Notify the program coordination of any changes to the treatment approach;
- Inform referred participants of their cancellation policy and advise them of any changes to it.

## 2.4 Responsibilities of Referred Individuals

- Referred participants must actively attend their scheduled therapy sessions and respect their caregiver's cancellation policy.
- Referred participants must read the mental health program's internal policy.
- Referred participants must contact their caregiver and the program coordination to pause their remaining sessions when necessary, in order to avoid unnecessary costs due to repeated cancellations (paused sessions remain available until March 31 of the current fiscal year).

- Referred participants must submit their pause request at least 3 days before the next scheduled session.
- Referred participants are required to respond to the quarterly follow-up conducted by the mental health program coordination.
- Referred participants are required to notify the program coordination of any change in their employment status that may affect their eligibility, outside of the regular verification periods conducted by the NETWORK. Alternatively, they may inform their organization's human resources department so that the employee list is updated at the time of their departure.

For any communication with the program coordination, referred participants are invited to write to [mentalhealth@reseautlnetwork.com](mailto:mentalhealth@reseautlnetwork.com).

## **3. Cancelled or postponed sessions**

### **3.1 Last Minute Cancellation**

The NETWORK covers the cost of any session cancelled late by a referred participant. The caregiver invoices the session as usual and submits the invoice to the program coordination. This session is also deducted from the referred participant's remaining session balance.

The amount charged to the NETWORK for a last-minute cancellation by a referred participant is at the caregiver's discretion, in accordance with their own late cancellation policy.

### **3.2 Determining Session Renewals**

Session renewals are subject to the NETWORK's available financial resources and the volume of incoming requests. As such, it is not possible to renew sessions indefinitely for all referred participants.

In a situation where financial resources are limited and there is a high influx of requests, priority will be given to Inuit, First Nations and Métis community members, in accordance with our mission and commitment to these communities. We encourage all referred individuals and caregivers to discuss possible financing options (e.i. personal insurance, employer-provided insurance, access to [Non-Insured Health Benefits for First Nations and Inuit](#)) and to plan ahead for care extension options, anticipating the possibility of non-renewal of sessions following the allocation of the 15 basic sessions offered by the NETWORK.

### **3.3 Suspension of sessions due to disengagement**

When a referred participant disengages from their caregiver and the NETWORK, their sessions are suspended for a set period. Disengagement is primarily defined as repeated cancellations of sessions provided by the NETWORK, without respecting the caregiver's cancellation policy.

If more than three sessions are cancelled without proper notice, as outlined in the caregiver's cancellation policy, access to the program will be suspended for a period of six months. During this time, the remaining session balance is preserved and can be used once the suspension has ended.

The NETWORK contacts both the referred participant and their caregiver before any suspension takes effect. After the six-month period, the NETWORK follows up with the caregiver to confirm whether they are still available to continue with the referred participant or whether a new match is needed.

Once the caregiver's availability is confirmed, the NETWORK contacts the referred participant to reinstate their access to the service.

## 4. Referred individuals rights

### 4.1 Bill 21

[Bill 21](#) establishes that the title of psychotherapist and the practice of psychotherapy are reserved in order to ensure that professionals working in this field have the necessary skills. Since its adoption in June 2009, it has been possible to file a complaint against a psychotherapist, as they are governed by a professional order.

In Quebec province, the practice of psychotherapy is reserved for psychologists, physicians, and holders of a psychotherapist's permit. Members of the following orders, who have the required skills, may apply for a psychotherapist's permit:

- Guidance counselors
- Occupational therapists
- Nurses
- Psychoeducators
- Social workers, Marriage and family therapists

Only providers members of l'Ordre des Psychologues du Québec can use the title of psychotherapist. However, certain non-members may be recognized as practicing psychotherapy and use this title by virtue of acquired rights, provided they were practicing before the law came into effect and meet government criteria. To benefit from this recognition, they must prove their experience and competence, generally by providing evidence of training and supervision.

The Ordre des psychologues du Québec issues psychotherapist licenses in accordance with the Regulation respecting psychotherapist licenses. To establish a uniform process for regulating psychotherapy in an interdisciplinary context, an interdisciplinary advisory board was created within the Order, responsible for providing advice and recommendations to the Office des professions and professional orders on issues related to the practice of psychotherapy.

### 4.2 Dissatisfaction with services received

If a referred participant is unsatisfied with the services received from their caregiver, they may contact the mental health program coordination at [mentalhealth@reseautlnetwork.com](mailto:mentalhealth@reseautlnetwork.com) so that the NETWORK can match them with a different caregiver.

If a referred participant wishes to file a complaint against their therapist, they may contact the program coordination for further information.

## 5. Privacy Policy

### 5.1 Introduction

The protection and security of personal data belonging to referred participants, caregivers, and organizations is a priority for the NETWORK. This policy outlines how we collect, store, use, and share data pertaining to all three parties.

### 5.2 Data Collection

In accordance with the *Act to modernize legislative provisions respecting the protection of personal information* (Law 25), the mental health program is committed to collecting only the information strictly necessary for service delivery and the proper functioning of the program. This may include: first and last name, email address, phone number(s), sociodemographic information, reason(s) for requesting mental health support, and the name of the organization for which the individual works.

In keeping with the principle of data minimization, a summary of each conversation held with referred participants and their caregivers is retained in a document archived on our secure cloud-based system. The same standard of care applies to documents received during quarterly eligibility verifications.

To protect the identity of referred participants, a code name is assigned to each individual upon entry into the program. This code name is generated by an anonymization tool developed by our information technology coordination, and is used

for invoicing purposes (when the caregiver consents to its use) as well as for all email communications.

The NETWORK has developed an internal application allowing caregivers to track the remaining sessions for the participants referred to them. In compliance with Law 25, no personal information is included in this tool — only the code name, the number of sessions allocated, the number of sessions remaining, and the caregiver's name.

Fully anonymized data is used annually for statistical purposes as part of the NETWORK's annual report. This data may include the number of sessions allocated, session costs, number of complaints, and participant feedback.

### **Rights of Individuals Concerned**

In accordance with Law 25, any individual whose personal information is held by the NETWORK has the right to access their data, request corrections, or request its deletion within the limits permitted by law. To exercise these rights, individuals may contact the program coordination.

## **5.3 Data Storage and Use**

All personal and private data collected is securely stored on a private cloud-based system recognized for its high security standards. Access is strictly limited to program coordination and information technology coordination. No copies of the data are kept on other servers or external systems without authorization. The private cloud system is used by two individuals, the program coordination and the information technology coordination. In the event of a change in coordination, the account will only be transferred at the time of the transition.

We do not sell, rent, or share any data belonging to the parties involved with third parties or for commercial purposes. Data is also not shared with other members of the NETWORK team.

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**Contact the NETWORK:**

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