

ANSWER CHOICES	RESPONSES	
Registered Psychotherapist	86.57%	58
other regulated professional	1.49%	1
stakeholder representing a professional organization	0.00%	0
stakeholder representing a service-providing organization	1.49%	1
member of the public	1.49%	1
other (please specify)	8.96%	6
TOTAL		67

#	OTHER (PLEASE SPECIFY)	DATE
1	Registered Psychotherapist (Qualifying)	6/7/2018 8:18 AM
2	therapist in TRaining	6/6/2018 3:06 PM
3	psychotherapy trainee	6/6/2018 2:47 PM
4	Therapist in supervision	5/29/2018 9:30 PM
5	Training to be a psychotherapist	5/29/2018 1:15 PM
6	student	5/28/2018 6:31 AM

Q3 Please provide your comments on the draft Sexual Contact with Former Clients Within a Five-year 'Cooling Off' Period Policy.

Answered: 49 Skipped: 18

#	RESPONSES	DATE
1	I think it should be at least One year, just as the RHPA says, not five years. And, that the penalty should certainly consider and depend on circumstances what harm was caused, whether the RP met client for 1 session or many, etc. I think "revocation of the member's certificate of registration for five years, regardless of the circumstances" does not reflect "commensurate" with the violation of the regulation; and I believe (though I am not a lawyer!) that "commensurate" is a legal principle.	6/9/2018 6:42 PM
2	I don't understand why the "cooling off period" isn't permanent. That is, why isn't sexual contact entirely PROHIBITED, especially when the policy has the following statement in it "Members should understand that it may never be appropriate to enter into a romantic or sexual relationship with a former client, specifically where a power imbalance continues to exist between the member and the former client, which places the former client at risk of undue influence, harm or exploitation. "	6/7/2018 4:52 PM
3	I am an older therapist and understand that sexual drive in transference/countertransference can be strong for some. I think this cooling off rule is a protection for the therapist as well as the client.	6/7/2018 12:21 AM
4	I agree with the draft policy.	6/6/2018 6:06 PM
5	A five year period is probably plenty of time as this allows for the possibility of a random meeting at some point in the future. 'Random meeting' being the operative expression here. I would hate to think of either client or RP keeping tabs on the other until the allotted time has passed or, worse yet, just keeping something that is already brewing quiet until it is "legal." For me, it is the circumstances of the initial meeting that presents a problematic situation that will never change. The likelihood is that any relationship is tied to an enactment stemming from the initial perception of imbalance. How can a truly healthy relationship come out of this?	6/6/2018 5:14 PM
6	I have not had that situation ,I doubt I will be in that position to deal with that policy, how ever that could happen to individuals we are humans , people fall in love on the job all the time , if that fall in love and are not working in the same office ,five years is too long a period. yes we should protect our clients from abuse .I disagree with five years, one are two years the most.	6/6/2018 4:43 PM
7	I believe the Five-year 'cooling off' period policy is reasonable.	6/6/2018 4:26 PM
8	I disagree with the 5 year cooling off period policy. One year is adequate.	6/6/2018 4:01 PM
9	My concern is there be room for the accused person to right process. Definitely, the psychotherapist should never misuse his/her trust and should ever be vigilant of their own motivations and self.	6/6/2018 3:43 PM
10	5 years is too long. There are many variations in the needs and vulnerability of clients, as well as the length and depth of therapy. 1 year is sufficient.	6/6/2018 2:53 PM
11	I agree with this policy.	6/6/2018 2:50 PM
12	I agree that there is always an inherent power imbalance within the therapeutic relationship, which potentially leaves clients vulnerable to being influenced by their practitioner in ways which may constitute an abuse of power. In my opinion, that power imbalance can remain long after a client has terminate treatment.	6/5/2018 6:07 PM
13	I often question if it is ever appropriate for any sexual contact with a former client. This might also depend on the duration of treatment (one or two sessions vs years of ongoing therapy). Moving from a professional, one-direction relationship, into something personal while the therapist would have knowledge fo the other person's inner most challenges and traumas. I find it difficult to figure out how any social/ romantic/ sexual relationship is not problematic after any therapeutic relationship . 5 years minimum is better than the one year advised in Bill 87.	6/5/2018 8:59 AM
14	I fully support the draft.	6/4/2018 4:46 PM

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SurveyMonkey

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15	In my experience, most relationships which end require a number of years in which to gain perspective on that relationship. Perhaps five years is a bit over long; I suggest three years as a compromise.	6/2/2018 3:40 PM
16	I suggest a Two-year cooling off period	6/2/2018 10:20 AM
17	I would like the Policy to explain how the time period of 5 years was decided. Is this arbitrary? Why not 2, 3, or 4 years? Any related case/common law? And, not to be contrarian, but rather out of curiosity, how might something like this affect people in Canada whose cultural or religious populations are small (assuming of course that no exploitation, abuse of power, etc. can reasonably be assessed? Can this even be assessed?)	6/1/2018 3:43 PM
18	Sexual relations is nearly always harmful. The guidelines should advise no cooling off period, as such and recommend it is never advised to become intimate with a client. The effects can last a life time.	6/1/2018 2:35 AM
19	I feel that three years is enough of a cooling off period.	5/31/2018 8:55 PM
20	Should intentions be pure between the two involved and by pure I mean with intention to have a committed and loving relationship, a five year cooling off period is too long. One year, only if the intention is to form a mutual, respectful, committed relationship, is reasonable. Alternatively, there should be the ability to have a legal document signed between two parties indicating both parties are consenting to a romantic relationship and are forgoing the five year cooling off period. This would serve to protect both the client and the RP.	5/31/2018 10:19 AM
21	5 years seems excessive if the work together is minimal and less complex. One year seems to short to ensure the attachment/attraction isn't based on insecure needs. My thought is two years. Also, What is missing here, which can be related or separate to sexual contact, is what cooling off period should there be for a friendship relationship after a completed therapy? Just as the art of psychotherapy is nuanced, subtle and complex, so is determining when a therapy is complete, to what degree, and how successful the client has established a clear sense of self which informs healthy self decisions. What is right and fair is to have a forum for how to safely establish the degree to which the power imbalance between client and therapist has become more or less equalized, rather than to have a definitive, one-size-fits-all solution to a difficult problem, regardless of the circumstances. I believe where we want to create safety for the client who continues to have a weak sense of self and still under the influence of a power balance, we cannot penalize the client (or therapist) where the client has indeed worked hard and completed a good therapy gaining a strong sense of self, only to be injured again by being denied a healthy attachment and potential life partner. Where this situation my be more the exception, we still owe it to the health and well being of the client not to reinjure.	5/31/2018 10:17 AM
22	Agree	5/31/2018 8:45 AM
23	With such a long cooling off period, maybe circumstances should be taken into account before invoking the maximum penalty.	5/30/2018 12:42 PM
24	I agree with a minimum of 5-years with an understanding that there is a high degree of risk to the client even after this period.	5/30/2018 8:52 AM
25	Strongly agree with the policy.	5/30/2018 8:36 AM
26	I don't agree with this policy as I believe there should be NO sexual contact EVER with former clients.	5/30/2018 7:20 AM
27	It is important that we hold up the principle that sexual relations between a psychotherapist and their patients or their patients family members is never appropriate. I believe that once a person has been a client or patient of a registered psychotherapist there should be lifetime ban that applies to sexual contact between them and that this should be advertised loudly. This measure has maximum clarity and mirrors societies taboo against incest which is appropriate given the transference dimensions that I believe always exist in a therapeutic relationship. Further to this I believe the same restriction should apply to supervisors and supervisees, trainers and students. The sexual exploitation of students in supervisees is a prevalent and very serious problem for our profession. A number of training institute are directed by persons who Are now married or otherwise sexually involved long-term with former clients, students, or supervisees. Until such time as this is not the case we need to adopt a policy that very clearly sets out an absolute ban To reestablish the professions standard and credibility.	5/29/2018 11:01 PM
28	I completely agree with what the draft proposes.	5/29/2018 9:30 PM

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29	Due to the inherent power dynamic between a client and an RP there needs to be a minimum period of 5 years cooling off time before intimate relations.	5/29/2018 5:37 PM
30	I agree with the policy.	5/29/2018 2:45 PM
31	Very appropriate	5/29/2018 2:19 PM
32	I would suggest that penalties be tiered in accordance to the action(s) of the RP in points b & c of the draft. The disciplinary actions such as a shorter period of revocation of license, retraining/personal therapy and clinical supervision, upon re-entry to the profession be dependent on the findings of the investigation. If there is sexual intercourse, the 5 year revocation on the RPs license is a good standard.	5/29/2018 1:38 PM
33	Sexual assault should not be in the same category as remarks or behavior of a sexual nature nor should the imposed penalty be. Sexuality can be an important part of a client's identity, and all sorts of misconceptions and misinterpretations is possible. Sexual remarks and behavior needs to be defined, and a revocation of a CRPO license for 5 years (or any years) may be too harsh for what might be a misinterpretation by a client. How would this be established?	5/29/2018 1:27 PM
34	I agree with the policy.	5/29/2018 1:15 PM
35	I am supportive of a cooling off period. It seems to me that the standards we used before regulation for contact with former clients in a social way, not necessarily sexual was two years after therapy ended. There is a difference I realize between social and sexual, but five years seems too punitive as a blanket rule.	5/29/2018 1:14 PM
36	I think a two-year cooling off period sounds more appropriate.	5/29/2018 1:12 PM
37	With the power imbalance I do not consider a 5 year cooling off period adequate. In my view once a client is a client they will be considered so foreverany sexual contact is inappropriate and irresponsible.	5/29/2018 1:09 PM
38	I think three years is more appropriate, and realistic	5/29/2018 1:07 PM
39	This was very confusing. The one year and then five year cooling off period. It is unclear. Also I wonder if there should be a provision as to what makes an individual a client. If perhaps someone went for an initial consult and decided the therapist wasn't a good fit, or that they were too close in age (or knew them from school) or had an attraction and later ran into this person in a social scenario. Would this be a boundary violation to date?	5/28/2018 6:31 AM
40	I am a registered massage therapist. I get the cooling off period but each case is different. It would depend on length of treatment, nature of treatment etc. It seems to be quite long.	5/23/2018 7:29 PM
41	It is unclear in the language of the policy whether the proposed mandatory penalty will be imposed as a result of allegations or as a result of a finding It is unclear to what "regardless of circumstances" refers. The insistence on the 'inherent power relationship' is detrimental to a profession which seeks or should seek to minimize the development of such a power relationship; it is unnecessary to use this as a rationale or principle because it is not applicable to all modalities and client/therapist therapeutic relationships. The power relationship is obviously more evident in hospital and clinical settings where 'patients' are often far more vulnerable and often unclothed. RPs are primarily independent and see "clients" are independent. There can be a very real difference between patient and client and this is important to the therapeutic relationship. Penalties and policies should be aligned and consistent across all colleges/professions. Does CRPO have evidence of consultation and collaboration with other colleges on this draft policy? Will psychologists, doctors, social workers, nurses, etc. be regulating the same way? Consistency across the board is vital to success and compliance. If CRPO imposes stricter or different rules than others, does that undermine the policies of other colleges and their members? And precisely how do different standards, policies and regulations ultimately protect the public? These questions should be addressed in any draft policy so that the public understands the approach. If your policy was a result of collaboration and consensus with other colleges - this should be stated to the public; otherwise, it looks as if you are going above and beyond others and as mentioned above - this adds to confusion for both public and professionals. I would like to see evidence of such collaboration on all major initiatives, policies and regulations. You have already gone beyond what has been passed in the legislature - why? Also, why not get your members and the public involved prior to rel	5/23/2018 2:19 AM

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 42 This draft policy is ridiculous and completely unrealistic. Under this policy, a client could come to an RP one time for a 50 minute session, identify a romantic or sexual chemistry, cease to have a client-therapist relationship immediately, and decide to have a romantic relationship instead. This would then be a reportable activity that could would result in the removal of the RP's license. This files in the face of the realities of human behaviour outside of the professional realm in this manner. This policy would result in the needless loss of Registration of many members. Therapy is an intimate, bond-forming experience between human beings. You cannot regulate us as though we are programmable robots. I am completely opposed to this oppressive draft policy. I would recommend a 3-month cooling off period. 43 I'm happy to see CRPO take a stronger stand on this issue. I highly doubt that anyone would wait 5 years before pursuing a relationship is on hopefully that is enough of a deterrent to even entertaining that option. 44 I firmly support Principle 2 of the Draft Policy and also assert that the recommended penalty sounds appropriate. Having heard from several of our members (whom I have encouraged to complete your survey individually) I would imagine many will view any such action as too punitive as they view the regulatory college itself as a punitive body. I firmly disagree with these views. The OACCPP will be submitting a formal response to this Draft as well. 45 I think 5 years is a reasonable amount of time for a cooling off period. 46 In regards to former clients specifically, I think 5 years is an extreme and unnecessary measure. In one instance we are asked to use our professional judgment, length of treatment time and seriousness of the case. Now, the RP's will be punished and license revoked "regardless of circumstances". It feels like a violation of our civil rights. I think 2 years is the maximum I would vote. Other colleges are asked to use profess	5/15/2018 11:13 PM
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has been selected? Is there some research that says that if clients don't come back for therapy in 5 years they're unlikely to want to return? Is there some research that says that it can take up to 5 years for initial bonding hormones to subside. Generally, I'm not very comfortable with mandatory sentences. I would think that if client contact were fairly short term, the client had lots of resilience, they met up somewhere 2 years later, the relationship is mutually consensual, and the complaint came from a colleague or a member of the public, and not the former client, then I think a 5 year revocation of the license seems out of proportion to the "crime." If the timeline is based on some research that I'm unaware of, perhaps I'd feel more comfortable. But currently it seems just a bit arbitrary and moralistic. Not that I'm opposed to being moral. I'd like there to be more room for discretion by a committee of peers or something	4/18/2018 4:33 PM