

ADRBO Dual Review Process

Whenever a decision is made by ADRBO regarding the outcome of a complaint, it must be reviewed by two senior members of ADRBO staff before it becomes final. All Initial View letters and draft investigation reports are subject to this process. The Dual Review Process ensures that all of ADRBO's decisions regarding the final outcome of complaints meet the standards of fairness, independence and competence described in ADRBO's Terms of Reference. This process also provides the Ombuds and Deputy Ombuds with insight into the performance of investigators, and provides current information on the nature of complaints and issues facing ADRBO member banks, including whether any systemic issues are surfacing at those banks or across the industry.

Initial View Letters

Where the Deputy Ombuds decides that it is not within ADRBO's mandate to investigate a complaint, this decision is explained in the form of an Initial View letter (I-V letter). The Ombuds and another senior member of ADRBO staff (or two senior members of ADRBO staff if the Ombuds is unavailable) review the I-V letter before the decision becomes final, and the I-V letter is sent to the Complainant and the affected Bank. Where the reviewers disagree as to whether the complaint is outside ADRBO's mandate, the Ombuds shall make the final determination as to whether an Initial View letter will be sent or an investigation will take place (if two staff are reviewing the I-V letter and there is disagreement, it will be sent to the Ombuds when he/she is available for a final determination). This determination must take place within 3 business days from the date the I-V letter is sent for review (unless the Ombuds is required and is not available within those three business days).

Draft Investigation Reports

Once an investigator has concluded an investigation, a draft report is prepared by the investigator and submitted to the Deputy Ombuds to undergo the Dual Review Process. The draft report will be reviewed by the Ombuds and Senior Advisor (or a senior member of ADRBO staff if either the Ombuds or Senior Advisor is unavailable). The review is to ensure that the draft report and recommendations comply with the standards set out in ADRBO's Terms of Reference. During this review, suggestions regarding amendments to the report, new avenues for investigation, and questions or comments on the report may be provided to the investigator; however, the investigator retains the final authority whether (and to what extent) to accept any suggestions made. Where no unanimous agreement can be obtained regarding the form of the draft report or the content of the recommendations, the Ombuds makes the final decision regarding whether to submit the draft report to the parties without changes or, if necessary, order a new investigation be conducted by another investigator.

This review must be completed within 2 weeks from the date that the draft report is submitted to the Deputy Ombuds.