

## ADRBO Accessibility Policy

### Definitions

**“Accessibility”** refers to the design of ADRBO’s Services for people who experience Disabilities;

**“ADRBO”** stands for the ADR Chambers Banking Ombuds Office;

**“Complainant”** is any individual who brings a Complaint against a Member Bank to ADRBO;

**“Complaint”** means dissatisfaction, whether justified or not, expressed to ADRBO with respect to

- (a) a Financial Service in Canada that is offered, sold or provided by a Member Bank; or
- (b) the manner in which a Financial Service in Canada is offered, sold or provided by a Member Bank;

**“Disability”** means any impairment, including a physical, mental, intellectual, cognitive, learning, communication or sensory impairment — or a functional limitation — whether permanent, temporary or episodic in nature, or evident or not, that, in interaction with a barrier, hinders a person’s full and equal participation in society;

**“Financial Service”** means a financial product or service or advice about a financial product or service;

**“Investigator”** means the individual performing an investigation;

**“Member Bank”** means a financial services provider that uses ADRBO’s services as its federally regulated external complaints body;

**“Services”** refers to ADRBO’s full administration of a Complaint, from the initial contact with the Complainant; to the intake of the Complaint; to the review of the Complaint; to the communication of a decision on the Complaint to the Complainant or the potential investigation of the Complaint and communication of a final recommendation on the Complaint to the Complainant.

### Policy

WHEREAS the ADRBO is committed to meeting its current and ongoing obligations under the Canadian Human Rights Act respecting non-discrimination; and

WHEREAS the ADRBO is further committed to excellence in serving all Complainants including people with Disabilities;

ADRBO adopts the following Accessibility Policy:

ADRBO's accessible Complainant Services are consistent with the principles of dignity, independence, integration and equality of opportunity for people with Disabilities.

**Dignity** means that ADRBO will provide its Services in a way that allows a Complainant with a Disability to maintain self-respect and the respect of other people.

**Independence** means that a Complainant with a Disability is allowed to submit a Complaint to ADRBO without unnecessary help or interference from others.

**Integration** means that ADRBO will provide its Services in a way that allows a Complainant with a Disability to benefit from the same Services in the same way as other Complainants, unless a different way is necessary to enable the Complainant's access to the Services.

**Equal opportunity** means that ADRBO will provide its Services to a Complainant with a Disability in such a way that the Complainant has an equal opportunity to access those Services as what is provided to others.

With regards to the above principles, ADRBO is committed to ensuring equal access and participation for Complainants with Disabilities. ADRBO is committed to treating Complainants with Disabilities in a way that allows them to maintain their dignity and independence. ADRBO believes in integration and is committed to meeting the needs of Complainants with Disabilities in a timely manner. ADRBO will do so by removing and preventing barriers to Accessibility. The greatest potential barriers to Accessibility in the provision of ADRBO's Services relate to communication. ADRBO is prepared to communicate with Complainants who experience Disabilities in a way that takes into account their Disability.

Accessibility is a shared responsibility between ADRBO and a Complainant. ADRBO will cooperatively engage with Complainants at the initial contact stage, the intake stage, the potential investigation stage, and the communication of results stages to determine their needs. Complainants may also contact the intake team at any point before, during and after the provision of ADRBO's Services. A Complainant who experiences a Disability should advise ADRBO of the existence of their Disability, although ADRBO need not know the specific nature of the Disability. The Complainant should make his or her needs known to ADRBO to the best of his or her ability, preferably in writing, so that ADRBO may make accommodations. The Complainant should answer questions or provide information regarding his or her relevant restrictions or limitations and should participate in discussions regarding possible accommodation solutions.

In return, ADRBO will communicate with Complainants with Disabilities in ways that take their Disability into account. This may include the following:

*Communications with the Intake Team*

ADRBO ensures that Complainants may submit a Complaint through multiple modes of communication. Complainants may fax, email or mail their Complaints to ADRBO. These Complaints may be either typed or handwritten. ADRBO's intake team is bilingual in French and English and is available to speak to the Complainant before, during and after the provision of the Services, to respond to questions (both over the phone and written) and to assist Complainants in all aspects of submitting their Complaint and understanding the Complaint process. In special instances, if a Complainant has difficulty with writing, an ADRBO intake coordinator will take the Complaint over the phone and transcribe the Complaint as the Complainant relates it to them. ADRBO's intake team repeats, clarifies and restates information, as necessary.

#### *Communications with the Investigator*

Investigators likewise will choose a method of communication (generally email or phone) to interview Complainants as is most convenient and comprehensive for them. Investigators will also repeat, clarify and restate information, as necessary.

#### *Communications of Decisions and/or Recommendations*

All decisions and/or recommendations are communicated in writing to the Complainant, both via mail and email (or whichever one is requested). Decision-makers and Investigators will take the Complainant's unique circumstances into account in assessing their Complaints. Subsequent concerns will be duly taken into consideration and responded to in writing. ADRBO's intake team will explain written answers to Complainants over the phone on an as-needed basis.

#### *Use of an Authorized Representative*

Complainants may make use, if they so choose, of an authorized personal representative, guardian or trustee to assist in the submission of their Complaint and all communications with ADRBO pertaining to the Complaint. An authorized personal representative, guardian or trustee may be assigned to assist with the Complaint in any situation, so long as he or she also signs the Consent and Confidentiality Agreement and provides his or her contact information on the Complaint Submission Form, preferably along with the Complainant's signature and contact information.

ADRBO commits to working with Complainants with Disabilities to determine what methods of communication work best for them. ADRBO encourages Complainants who have Disabilities to provide feedback on how ADRBO provides accessible Services.