Habib Canadian Bank

Accessibility Plan

June 1, 2024

GENERAL

Executive Summary

Habib Canadian Bank (the Bank) is devoted to fostering an inclusive and accessible culture. We strive to help build a Canada free of barriers by developing an accessibility framework that facilitates optimal experiences for our employees and customers when using our services, products, and facilities.

We understand that generating a barrier-free environment is a continuous process, not something that happens overnight. Therefore, we commit to the persistent detection, elimination, and deterrence of obstacles over the long term.

Feedback Process

Our commitment to inclusion and accessibility incorporates a feedback process so that employees and members of the public can share their ideas and input with us. We will review the feedback that we receive and take steps to address barriers identified through this feedback.

You can use our feedback process to provide your feedback on:

- Barriers when dealing with the Bank;
- Our accessibility plan; and
- Our feedback processes.

To provide feedback on accessibility, please use one of the contact methods below.

Email: concerns@habibcanadian.com
Fax: 905-276-5400
Mail:
Human Resource Manager
6450 Kitimat Road
Mississauga, Ontario, L5N 2B8

If you require support while providing feedback, let us know, and we will do our best to meet your needs. If you provide your contact information, we are committed to responding to your feedback in a timely manner and in the format that we receive it. You may also choose to provide feedback anonymously. However, acknowledgement will not be sent for feedback that was sent to us anonymously. We are dedicated to fostering an inclusive and accessible environment, which includes a feedback mechanism for both employees and the public to share their thoughts and suggestions. All accessibility feedback will be kept for a period of seven years from the day it is received.

This feedback will be analyzed to prioritize the most critical issues, and an action plan with specific goals will be developed. The plan will be implemented in phases, monitored regularly, and updated based on continuous feedback to ensure ongoing improvement and effectiveness.

The accessibility lead for Habib Canadian Bank is the Human Resource Manager.

You can reach out to our accessibility lead to provide feedback on this Plan, request alternative formats of this Plan or to request a description of the feedback process for accessibility at Habib Canadian Bank in an alternative format: print, large print, Braille, audio or an electronic format that is compatible with adaptive technology that is intended to assist persons with disabilities. We will provide the format you ask for as soon as possible. Braille and audio formats may take up to 45 days. Print, large print and electronic formats may take up to 20 days. To do this, please contact:

Name: Isabelle Fernandes
E-mail address: i.fernandes@habibcanadian.com
Phone number: 905-276-5300 Ext 244
Address: 6450 Kitimat Road, Mississauga, Ontario, L5N 2B8

Reporting on Our Plan

Every year, as required by the Accessible Canada Act (ACA), we will publish a status report outlining our progress toward meeting our commitments. Every three years, we will review and update our accessibility plan. We will also track our overall progress and how the plan affects our organization's culture and experiences.

The *ACA* includes seven principles
- Everyone must be treated with dignity.
- Everyone must have the same opportunity to make for themselves the life they are able and wish to have.
- Everyone must be able to participate fully and equally in society.
- Everyone must have meaningful options and be free to make their own choices, with support if they desire.
- Laws, policies, programs, services and structures must take into account the ways that different kinds of barriers and discrimination intersect.
- Persons with disabilities must be involved in the development and design of laws, policies, programs, services and structures.
- Accessibility standards and regulations must be made with the goal of achieving the highest level of accessibility.

CONSULTATIONS

At Habib Canadian Bank, our banking program for people with disabilities is built on the **guiding principle** of servicing the clients with attentiveness and in an empathetic manner. We want to ensure that every one of our customers has a smooth and pleasant banking experience. We are there to help them with all their appropriate banking needs, whether it be online, over the phone or in person.

In order to identify and subsequently remove barriers to accessibility, Habib Canadian Bank is committed to listening to people with disabilities and experts. In this regard, we consulted with and collected feedback from our staff in the form of a survey. Participants of the survey were asked what

accessibility barriers they face when dealing with Habib Canadian Bank, how they should be addressed and whether our feedback process meets their accessibility needs.

We also obtained input from information technology experts who assisted us in ensuring our website complies with accessibility standards. Habib Canadian Bank is committed to conducting more consultations with employees and customers.

ADDRESSING AREAS IDENTIFIED IN THE *ACA*

The Bank identified barriers in all the key areas identified in the Act, as well as actions to address them.

The key areas are:
- The Built Environment: Accessibility in physical spaces.
- Employment: Policies and practices for inclusive employment.
- Communication other than Information and Communication Technologies (ICT): The communication priority area relates to all methods of communication used at Habib Canadian Bank to communicate with employees and customers.
- Programs and Services Design & Delivery: Inclusive and accessible program offerings.
- Procurement of Goods, Services, and Facilities: Ensuring accessibility in procurement processes.
- Information and Communication Technologies (ICT): Accessible digital tools and resources.
- Transportation: Accessible transportation services.

BUILT ENVIRONMENT

Barrier: Current bank facilities might not be fully accessible for individuals with various disabilities with respect to visual and auditory challenges.

Action Plan:

Audit and Environment:
- Conduct an accessibility audit of the bank premises by consulting with a disability expert and/or using a checklist provided by an organization specializing in accessibility.
- Identify high-impact, low-cost solutions such as:
  - Clearing paths of travel to ensure they are wide enough for wheelchair users.
  - Adjusting the height of service counters or providing a section of the counter that is at an accessible height for individuals in wheelchairs.
  - Adding tactile indicators at key locations to assist visually impaired customers in navigating the space.
  - Ensure all entryways are step-free, and if not possible immediately, provide portable ramps as an interim solution.

Staff Training:
- Train staff in disability awareness and the proper etiquette for assisting customers with disabilities.

- Establish a system where customers can signal if they require additional assistance, such as a discrete button at the counter or a pre-visit notification system.
- Budget for at least one major improvement each year, such as automatic doors, an accessible bathroom, or an improved waiting area with varied seating options to accommodate different needs.
- Implement a maintenance schedule to ensure that accessibility features like automatic doors and accessible paths remain in good working condition.

EMPLOYMENT

Barrier: Potential challenges in the recruitment, retention, and career advancement for individuals with disabilities.

Action Plan:

Inclusive Recruitment:
- Review and modify job advertisements to ensure inclusive language is used.
- Offer to conduct interviews in accessible locations or via accessible formats like video calls if preferred.

Workplace Accommodation:
- Establish a clear process for employees to request workplace accommodations without fear of discrimination. This could include ergonomic furniture, assistive technology, flexible scheduling, or telecommuting options.
- Designate a go-to person or team who is trained to handle accommodation requests efficiently and confidentially.

Onboarding and Training:
- Ensure that onboarding processes are accessible, providing materials in various formats and incorporating accessibility into training sessions.
- Provide disability awareness training for all staff, focusing on creating an inclusive culture and understanding the legal rights of workers with disabilities.

Performance and Feedback:
- Adapt performance review processes to be accessible and fair, considering the impact of disabilities on work performance and setting realistic, individualized performance goals.
- Implement a system for regular, anonymous feedback from employees about the inclusivity and accessibility of the workplace.

Emergency Preparedness:
- Review and update emergency evacuation procedures to ensure they account for the needs of employees with disabilities.

- Conduct regular drills, ensuring that all employees, including those with disabilities, can evacuate safely in an emergency.

COMMUNICATION OTHER THAN INFORMATION TECHNOLOGY

Barrier: Limited options for customers with disabilities to receive and process information, and difficulty for them in communicating effectively with bank staff.

Action Plan:

Communication protocols:
- Create a protocol for staff to identify and offer assistance to customers who may need alternative communication methods.
- Keep a supply of communication aids readily available, such as pen and paper for writing down information, and printed materials with large, clear fonts.
- Offer a list of services in braille for customers with visual impairments and ensure that some staff members are trained to communicate key service details in sign language for customers with hearing impairments.

Staff Training:
- Conduct regular training sessions for staff on how to use the available communication aids.
- Educate staff on how to interact respectfully and effectively with customers who have communication disabilities, including speaking directly to the customer, not just to their companion or interpreter if they have one.

Customer Feedback:
- Solicit feedback specifically about communication needs and preferences, both in-branch and through surveys, to identify gaps and opportunities for improvement.
- Establish a system for customers to request communication accommodations in advance of their visit, if possible.

Enhanced Visual Aids:
- Introduce clear signage around the bank with high-contrast colors and large print to assist those with visual impairments.
- Incorporate pictograms or visual aids into signage to communicate information non-verbally.

Accessible Printed Materials:
- Ensure that all new printed materials are designed with accessibility in mind, such as using simple language and high-contrast colors.
- Develop a process for creating accessible versions of key documents upon request, such as statements in large print or braille, and ensure a fast turnaround time for these requests.

THE DESIGN AND DELIVERY OF PROGRAMS AND SERVICES

Barrier: Bank programs and services may not be designed to be easily accessible or accommodating to customers with disabilities, leading to a lack of utilization and satisfaction.

Action Plan:

Assessment and Feedback:
- Conduct an initial assessment of current programs and services to identify where there may be accessibility gaps.
- Establish a feedback mechanism, such as comment cards or a dedicated email address, specifically for customers with disabilities to provide input on how programs and services can be more accessible.

Staff Training:
- Implement specialized training for staff to ensure they are prepared to deliver services to customers with disabilities, focusing on both technical accommodations and sensitivity training.
- Designate and train specific employees as 'accessibility champions' within various departments to advocate for and monitor the accessibility of programs and services.

Program Adaptation:
- Review existing services and modify them as needed to be more inclusive, such as offering extended appointment times for individuals who may require additional support.
- Ensure that all new services are designed with 'universal design' principles in mind, aiming to make them accessible to the widest possible audience from the outset.

Marketing and Communication:
- Adjust marketing materials to clearly communicate the availability and accessibility of services for customers with disabilities.
- Use diverse channels to communicate about programs and services to reach a broader audience, including organizations that work with the disabled community.

Accessible Service Delivery:
- Incorporate assistive technologies where needed in service delivery, such as screen reader software for online services or hearing loops in meeting areas.
- Evaluate the physical layout of service delivery areas to ensure they are navigable and comfortable for customers with various disabilities.

Policy and Procedure Updates:
- Develop or update policies and procedures to include specific references to accessibility standards for program delivery.
- Regularly review these policies to ensure they remain current with best practices and legal requirements.

THE PROCUREMENT OF GOODS, SERVICES, AND FACILITIES

Barrier: Procurement processes may not adequately consider the accessibility needs of employees and customers with disabilities, potentially leading to the acquisition of goods, services, and facilities that are not fully usable by everyone.

Action Plan:

Policy Development:
- Create a procurement policy that includes mandatory accessibility criteria for all new purchases, ensuring compliance with relevant standards such as the Americans with Disabilities Act (ADA).
- Develop a checklist for accessibility that can be used when evaluating products and services for procurement.

Vendor Communication:
- Communicate clearly with suppliers and vendors about the bank's commitment to accessibility, specifying that this is a key factor in procurement decisions.
- Include clauses in contracts that require vendors to adhere to accessibility standards and allow for penalties or contract termination if these are not met.

Staff Training:
- Train procurement staff on how to assess goods and services for accessibility, including hands-on demonstrations of assistive technology and accommodations.
- Encourage procurement staff to consult with employees with disabilities when evaluating products and services for purchase.

Accessibility Reviews:
- Regularly review and test procured goods and services to ensure they continue to meet accessibility standards.
- Establish a feedback loop with users, including both employees and customers with disabilities, to inform future procurement decisions.

Facility Accessibility:
- Prioritize accessibility in the leasing or purchase of any new facilities. This may involve conducting accessibility audits of potential new spaces before making commitments.

Technological Investments:
- When updating technology systems, ensure that the latest accessibility features are a primary consideration.
- Seek out technology solutions that are specifically designed with input from users with disabilities, ensuring compatibility and usability.

Ongoing Evaluation:
- Implement a system for the ongoing evaluation of the usability of goods and services by people with disabilities, potentially assigning this role to the bank's accessibility committee or a dedicated staff member.
- Use the findings from these evaluations to inform and update procurement policies regularly.

Strategic Partnerships:
- Develop partnerships with organizations that specialize in accessibility to stay informed about best practices and emerging solutions.

INFORMATION AND COMMUNICATION TECHNOLOGIES

Barrier: Online banking and other information technologies may not be fully accessible, creating difficulties for customers and employees with disabilities in accessing services and information.

Action Plan:

Website and Mobile App Accessibility:
- Perform an accessibility audit of the bank's website and mobile app using automated tools and feedback from users with disabilities.
- Update digital properties to comply with Web Content Accessibility Guidelines (WCAG) 2.1, ensuring features like text-to-speech, alternative text for images, and keyboard navigation are included.

Assistive Technology Compatibility:
- Ensure that all new IT procurement, such as software and hardware, is compatible with common assistive technologies used by people with disabilities.
- Provide training for IT staff on how to test for and implement assistive technology compatibility.

Staff Training:
- Offer regular training sessions for all staff on how to assist customers with disabilities in using technology-based services.
- Create quick-reference guides for employees to facilitate customer support related to assistive technologies and accessibility features.

Customer Support:
- Establish a dedicated helpdesk for customers who encounter issues with accessibility. This could be staffed by individuals trained in accessibility support.
- Provide alternative means of communication for tech support, such as chat, email, and a Teletypewriter (TTY) line.

Regular Updates and Testing:
- Schedule regular updates to digital platforms to incorporate the latest accessibility features.
- Conduct user testing with a diverse group of customers, including those with disabilities, to gather feedback on the usability of technology services.

Documentation and Online Resources:
- Ensure all online documentation and help resources are available in accessible formats.
- Create video tutorials with captions and audio descriptions to assist in navigating and using online services.

Emergency and Real-time Information:
- Implement systems to provide emergency and real-time information in accessible formats, such as alerts through the mobile app that are compatible with screen readers.
- Plan for redundancy in communication to ensure that critical information is always accessible to all users, regardless of disability.
- Develop a long-term IT strategy that includes a budget for regular accessibility updates and training.
- Build relationships with vendors and service providers who prioritize accessibility, ensuring that the bank's IT needs will be met in an inclusive manner moving forward.

Feedback Loop:
- Set up a process for continuous improvement based on user feedback, including a system for reporting accessibility issues and suggestions for enhancements.
- Regularly review feedback and make adjustments to services, support, and training programs as necessary.

TRANSPORTATION

Barrier: Challenges in accessing the bank locations for customers and employees with disabilities due to transportation issues.

Action Plan:

Accessible Banking Options:
- Enhance remote banking options, including comprehensive online and telephone banking services, to reduce the need for physical travel.

Parking and On-site Accessibility:
- Ensure that parking facilities are accessible, with ample designated spaces for individuals with disabilities located close to the entrance.
- Evaluate the accessibility of the path from parking areas to the bank entrance, making improvements like installing ramps or automatic doors as needed.

Awareness and Advocacy:
- Raise awareness among staff about the transportation barriers faced by individuals with disabilities and how they can assist.

Continuous Monitoring and Adaptation:
- Regularly review the effectiveness of implemented transportation solutions and be open to making changes based on feedback and evolving needs.
- Stay informed about advancements in transportation options that could benefit customers and employees with disabilities, such as autonomous vehicles or new public transportation initiatives.

GLOSSARY/DEFINITIONS

Accessibility

Accessibility refers to how services, technology, locations, devices, environments and products are designed to accommodate people with disabilities. Accessibility means giving people of all abilities equal opportunities to take part in activities. The term implies conscious planning, design, and/or effort to make sure something is available to people with disabilities. Accessibility also benefits the general population by making everything easier to use and practical for everyone.

Barrier

According to the Accessible Canada Act (2019) a barrier is 'anything - including anything physical, architectural, technological or attitudinal, anything that is based on information or communications or anything that is the result of a policy or a practice - that hinders the full and equal participation in society of persons with an impairment, including a physical, mental, intellectual, cognitive, learning, communication or sensory impairment or a functional limitation.'

Disability

According to the Accessible Canada Act (2019) disability is defined as '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 the society.'

WCAG

Web Content Accessibility Guidelines. These are guidelines for designing accessible web contents.