



# ACCESSIBILITY PROGRESS REPORT

JUNE 1, 2024



[Haventreebank.com](https://haventreebank.com)

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## OVERVIEW

Haventree Bank (the “Bank”) remains steadfast in its commitment to promoting inclusivity and accessibility for persons with disabilities. As part of our ongoing dedication to creating a workplace and society that embraces diversity and ensures equal opportunities for all, we continuously strive to implement updates and improvements in alignment with the principles outlined in the ACA. The following summary highlights recent initiatives and enhancements that underscore our unwavering commitment to fostering an equitable and inclusive environment where everyone can thrive and contribute meaningfully, regardless of their abilities... These efforts not only reflect one of our corporate values – Empathy – but also represent tangible steps towards building a more accessible and barrier-free future for all Canadians.

## GENERAL

The ACA and the *Accessible Canada Regulations* require federally regulated entities to prepare and publish an accessibility plan.

With approximately 200 experienced employees, the Bank is a private Canadian Schedule 1 Bank specializing in alternative mortgage programs and insured Guaranteed Investment Certificate (“GIC”) deposits.

The Chief Human Resources Officer is responsible for receiving feedback on behalf of the Bank. This feedback, as well as a request for a copy of the Bank’s accessibility report, can be sent via email, mail, or telephone:

Email: [accessibility@haventreebank.com](mailto:accessibility@haventreebank.com)

Address: Accessibility Feedback  
Haventree Bank  
P.O. Box 1160 STNTD  
Toronto, ON M5K 1P2

Toll-free: 1.855.272.0051

## CONSULTATIONS

The Bank is committed to taking steps to initiate formal consultations by conducting surveys and focus groups. While the Bank has not received any complaints regarding its handling of situations involving individuals with disabilities, we recognize the potential existence of barriers that require our



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attention and commitment to resolution. Moreover, the Bank will continue to proactively conduct accessibility assessments, research best practices, and provide employee training on accessibility issues. As part of informal efforts, the Bank has encouraged employees with disabilities to come forward and share their experiences and recommendations to enhance their overall experience at the Bank.

Please refer to each section heading for more information with respect to the consultations.

## FEEDBACK

Receiving feedback is crucial for creating an inclusive and equitable environment for all individuals. This feedback allows us to identify opportunities to accommodate the needs of people with disabilities and make the necessary improvements to enhance their experience. It can also give us a better understanding of the diverse needs and perspectives of our clients and employees, which can ultimately lead to better service and experiences for everyone. Therefore, we actively seek feedback on accessibility and approach it with an open mind, a willingness to learn, and a commitment to take action.

All feedback will be reviewed, and we will take appropriate actions to improve the Bank's policies, practices, and procedures with personal privacy will be respected. Alternate formats of this policy are available upon request.

Complaints will be addressed promptly and efficiently with feedback and responses provided in a format that is accessible to the complainant. The feedback process includes an evaluation of how individuals with disabilities are accommodated, including the actions to be taken by the Bank when receiving a complaint.

### ANONYMOUS FEEDBACK

When considering collecting anonymous feedback the following has been put in place thus far:

- Use of accessible survey platforms that allow the surveys to collect responses anonymously without requiring any personally identifiable information.
- Locked communication boxes have been placed in office locations to allow employees to provide feedback on an anonymous basis.



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## 1. EMPLOYMENT

### INITIATIVES

- 1.1 In late 2023, an employee-led accessibility committee was established, with its inaugural meeting held in January 2024 and comprised of employee volunteers;
- 1.2 A new Learning Management System, equipped with accessibility features, was implemented in January 2024. This makes online learning accessible organization-wide;
- 1.3 A company-wide and mandated accessibility webinar, AODA: “How to lend a helping hand” was initiated in March 2024. The webinar is now part of each new hire’s onboarding process;
- 1.4 Internal training modules and posters are currently in progress, designed to further educate first-line employees with a focus on accessibility;
- 1.5 As Microsoft users, our employees benefit from a variety of built-in accessibility tools native to the systems. We will continue to increase awareness around these features;
- 1.6 Our job postings include an inclusive statement and offer support to individuals who request accessible support; and
- 1.7 Job postings are drafted in a more concise format with diversity and inclusion in mind.

## 2. COMMUNICATION, OTHER THAN INFORMATION AND COMMUNICATIONS TECHNOLOGIES (“ICT”)

### INITIATIVES

- 2.1 In April 2024, the Bank conducted an accessible customer survey to our mortgage broker, borrower, and deposit clients. The completion rate was 74%. The Workplace Accessibility Committee was integral in designing the questionnaire for the survey.

The accessibility survey included questions regarding the accessibility of our websites, the clarity of our communications, previous experiences providing accessibility feedback, and whether respondents identified as having a disability. Additionally, respondents were asked to provide their full name and contact information if they wished to be contacted for further discussion on how the Bank could better accommodate their accessibility needs, with phone, email, TTY relay service, and IP relay service options.



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Responses to our websites being accessible were broken down as follows:

- Room for improvement - 18%
- Accessible - 82%

Responses to our digital assets (statements, notices) being accessible and understandable as follows:

- Room for improvement - 16%
- Accessible – 80%
- Not applicable - 4%

Responses and feedback received will inform our accessibility plans moving forward. Additionally, we will be consulting with volunteer clients and looking for ways of improving the accessibility at the Bank.

2.2 The Bank conducted a company-wide survey and garnered insights from 73 respondents. The survey findings unveiled certain areas for improvement and strategic interventions to enhance inclusivity and accessibility within the organization. Among the key discoveries, it was revealed that 33 respondents were unaware of the Bank's existing policy regarding accessibility, which signaled a critical need for enhanced awareness and training initiatives. In response, the Bank has initiated plans to develop and implement comprehensive awareness programs to ensure all employees are well-informed about accessibility. Furthermore, a significant portion of the respondents, 52 individuals, indicated that they had not received adequate training on providing clients with accommodation and services, which highlighted a need for further training initiatives. To address this gap, the Bank has organized training sessions, including a company-wide webinar launched in March 2024, with plans for continued training throughout the year.

### **3. THE PROCUREMENT OF GOODS, SERVICES AND FACILITIES**

#### **INITIATIVES**

The Bank is committed to making accessibility a mandatory criterion when assessing products, services, or facilities from third-party vendors. As part of this commitment, the Bank has incorporated a procedure into its third-party risk assessment process. This assessment involves verifying whether vendors comply with the accessibility requirements outlined in the ACA.



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## 4. INFORMATION AND COMMUNICATION TECHNOLOGIES

### INITIATIVES

A third-party audit was conducted on our digital tools with accessibility in mind:

- Overall, the website demonstrates good accessibility compliance, with adherence to Web Content Accessibility Guidelines (“WCAG”);
- Our broker portal has been scanned by a third-party and remediation efforts are in progress. At the time of submission of this report, 71% of the identified issues have been fixed; and
- The same third-party will also scan our client portal. At the time of this submission the third-party is performing their scan of the client portal to give the Bank an estimated number of issues to be resolved.

### DOCUMENT ACCESSIBILITY

- The Bank collected all our client-facing PDF documents. These documents are now stored with easy access if needed, should we be required to make them accessible in different formats.
- These documents will be made available upon request. The Bank has a supplier to provide braille formatting within the 45-day requirement if needed.

## 5. THE BUILT ENVIRONMENT

### INITIATIVES

- 5.1 The Bank offices are conveniently accessible via multiple modes of accessible public transportation. We strive to ensure that all employees and visitors can reach our offices comfortably and easily. Transportation schedules and accessibility features are available online.
- 5.2 Consultations were conducted to ensure that our buildings are barrier-free. For sight/vision barriers, the Bank consulted with the Canadian National Institute for the Blind (CNIB) and PCL Graphics Ltd. (PCL).
- 5.3 An introductory phone call was held with the CNIB to discuss their services for undertaking an on-site Built Environment Assessment, to identify any sight/vision barriers. The assessment and corresponding report should be shared by the end of June. Feedback received from the assessment will be thoroughly reviewed to identify, remove, and prevent barriers, with recommendations for implementation being considered.



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- 5.4 Additionally, an email communication was exchanged between the Bank and PCL regarding braille signage services within the office, with examples provided. Notably, there's no immediate requirement for braille signage within the office space, and we will engage the PCL's services when needed. The timeline for implementing recommendations is by the end of 2024.
- 5.5 For mobility barriers, contact will be made with the Spinal Cord Society (SCS) to discuss conducting an on-site Built Environment Assessment to understand any mobility and space accessibility barriers. Feedback received from the assessment will be reviewed for barrier identification, removal, and prevention, with subsequent recommendations being considered for implementation. The timeline for implementing these recommendations is also by the end of 2024.
- 5.6 Regarding hearing barriers, the Bank has reached out to the building Property Management team inquiring about any building upgrades to the evacuation system (for example: installing flashing strobe lights during an evacuation event). The timeline for implementing upgrades will be determined by the Property Management team.
- 5.7 Lastly, for dexterity-related barriers, consultation details are still pending completion.

## 6. THE DESIGN AND DELIVERY OF PROGRAMS AND SERVICES

An Accessibility Steering Committee ("ASC") has been established and an Accessibility Charter has been documented and approved. Key organization leaders participate in monthly ASC meetings. These leaders are familiarized with accessibility standards and guidelines.

Going forward, any new product launch will take a user-centered approach with accessibility in mind, ensuring that programs and services meet the needs of all users.

The Bank will continue to collaborate with disability organizations in accessibility to inform and further enhance our plan.

## 7. TRANSPORTATION

Although transportation is a key aspect of accessibility, as outlined in the *Accessible Canada Act*, the Bank does not offer transportation services and it is therefore not covered by this report.



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