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SUSTAINABILITY

Equitable Bank & Concentra Bank Accessibility Plan 2023 – 2026



Canada's Challenger Bank™

Equitable Bank & Concentra Bank Accessibility Plan 2023 – 2026

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General

We welcome feedback on this ever-evolving Accessibility Plan by contacting us through any of the means below. Your feedback will be reviewed by an inclusion-focused HR staff member.

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This Accessibility Plan is available in other accessible formats upon request using our contact information above.

Accessibility statement

Equitable Bank and Concentra Bank (hereinafter, together, referred to as “Equitable Bank”, “Equitable” or the “Bank”) are committed to providing an inclusive and accessible workplace for our employees to ensure that all employees and clients have the supports needed to reach their full potential. There can be no ‘best in class’ customer service without including that access piece.

Equitable’s Accessibility plan is designed to impact all aspects of the Bank, its stakeholders, and the employment life cycle. Beginning from recruitment and hiring, through onboarding, workplace accommodations, performance management and career development, our commitment to creating and sustaining accessible workplaces is central to the development of our exceptional talent and customer service.

A Message from Equitable Bank's CEO Andrew Moor

As Canada's Challenger Bank™, we feel a responsibility to be constantly assessing existing systems – internally and externally – and asking 'how can we improve upon the systems and strategies that exist now?' In the past year, and led by that very mindset, we felt it was important to expand upon the frequently-used DEI/ED&I acronym (Equity, Diversity and Inclusion); to be more intentional while also honouring the depth and breadth of this important accessibility work.

As such, our inclusion-focused work is now called IDEA² - Inclusion, Diversity, Equity, Accessibility and Anti-Racism. This shift to specifically name Accessibility in this work is critically important: to our staff, to our customers, disability communities and the movement at large.

With that spirit, we are excited to move forward with the findings of our extensive accessibility research, captured at a high level within this plan. Ensuring accessible systems are in place for all employees and customers to thrive remains an organizational priority, and this intentional lens will continue to be a focus, now, and moving forward.

A handwritten signature in black ink, appearing to read 'Andrew Moor', with a long horizontal line extending from the end of the signature.

Andrew Moor

President & CEO of Equitable Bank

A note from Equitable Bank's leader of Inclusion, Diversity, Equity, Accessibility and Anti-Racism (IDEA²)

The powerful 'nothing about us without us' phrase has been a critically-important catchphrase to the disability justice community, and our work here at Equitable Bank has, for years, also been guided by that beautiful lodestar. As such, when the initial Accessible Canada Act and related plan requirement was announced, it was wonderful to see that very intentional lens applied to this work. To be able to do this work alongside employees and contractors of lived experience is always our requirement. To see that all federally-legislated organizations are required to include people with disabilities in doing this work is exactly what makes it even more meaningful.

Quoting Deloitte's 'inclusive teams are [8 times more likely to outperform their peers](#)' findings, Equitable Bank will continue to always go beyond compliance, and be forever focused on the removal of barriers for persons with disabilities.

Equitable is tenaciously focused on ensuring our workplace culture is grounded in authenticity, and the amplification of individual voices. We deeply value – and are made stronger – when we amplify the voices of our staff. And above all, this work is propelled by justice. Quoting the amazing Chief Accessibility Officer of Canada, Stephanie Cadieux, "It is the barriers that hold people back, not their disability."

Forever forward,

A handwritten signature in black ink, appearing to read 'D. Sheppard'.

'Shep' aka D. Sheppard

Equitable Bank's Associate Director of Inclusion, Diversity, Equity, Accessibility and Anti-Racism

Our present day and movement forward

The *Accessible Canada Act* (“ACA”) legislation has a clear mandate of identifying, preventing and removing barriers to accessibility in seven (7) specific areas: employment; the built environment; information and communication technologies (“ICT”); communication other than ICT; the design and delivery of programs and services; the procurement of goods and services and facilities; and transportation.

Equitable Bank’s Accessibility Plan was informed and researched by employees, as well as external partners and consultants; and included input, research and testing by people with disabilities. There was as well as a gap analysis conducted on our current state.

Our Accessibility Plan describes some higher-level actions that will be undertaken by us, or that are already in action to address barriers and support the implementation of the ACA. We have created our own detailed internal list of gaps and related movements forward. Ultimately, the work towards equity and justice is truly ‘forever work’, as is our commitment to tackling that work.

Consultations

Existing documents related to accessibility provided by Equitable were reviewed by [INNOVA Research and Accessibility Consultants \(“INNOVA”\)](#), in order to identify strengths and any gaps in existing written policy and processes, and to draw out insight and recommendations to support the removal of barriers that otherwise could prevent the full participation of all individuals.

INNOVA specializes in developing inclusive solutions for greater accessibility, and is a partner of the Canadian Council for Rehabilitation and Work. Their consultants conducted a systematic review and gap analysis of our existing policies and processes to identify any barriers to accessibility and thereafter make recommendations for any remediations.

We also worked with [Deque](#) to conduct an audit of our web pages and applications. They are passionate about making digital experiences accessible to everyone and are committed to working with partners, like us, to build a practical plan for improvement. In the company’s own words, regarding accessibility, “Deque’s mission is digital equality. This mission does not only apply externally, but internally within our organization. Deque strives to practice inclusivity in support of this mission. This can surface in many ways, but some examples include: the internal software choices we make, how we hold meetings, and how we hire and train employees. As an organization, we are committed to equal opportunities and have written, and published, policies surrounding the Americans with Disabilities Act (ADA) and Equal Employment Opportunities.”

Fact gathering

A request was circulated to managers at Equitable, inviting feedback on their opinions regarding any accessibility barriers, facilitators, and gaps within the organization. Equitable also consulted with internal employees of lived experience with the guidance of our partner, INNOVA in the creation of this plan and the action plan detailed herein.

Organizational Accessibility Goals and Actions

Overarching Accessibility Goals

- Purposefully engage with a team of advisors, both internal and external, who have lived experience of inaccessibility to help us identify any barriers and shape our accessibility activities in a sustainable and ongoing fashion.
- Establish a measurement framework and targets to track accessibility improvements organization wide.
- Develop a strategy of increasing the representation of persons with disabilities within the organization.

Accessible Canada Act (ACA) Priority Areas:

Employment

Of the seven defined areas in the ACA, employment is especially prominent. The need for accessibility-specific resources, tools, and training is something that must be considered throughout the employment lifecycle. We have conducted a regular series of 1:1 interviews and focus groups over the past few years with conversations centered around a range of topics, including identifying any barriers in multiple areas, including accessibility, then generating ideas and plans for barrier removal.

Equitable is committed to fostering an inclusive, equitable and collaborative workplace where diverse experiences are valued and honoured. As part of that work, Equitable has enhanced and expanded the language used for explicating disability. As a result of this re-framing and support for assimilating this new language, the number of employees identifying as having a disability increased significantly, most especially in 2019 by expanding the language of what constitutes a disability within the self-identification process.

Objective 1

- As part of our future work, we are committed to increasing the number of employees with disabilities using labour market availability as a benchmark.

Actions

Ongoing

- Reviewing the hiring process with accessibility in mind and currently working with Lever, our external hiring software provider, to interrogate algorithms for bias and discrimination.

2024

- Review new job postings for inclusive language, disability inclusivity and essential job requirements (“Bona Fide Occupational Requirements”) with a focus on competencies required.
- Formalize an onboarding process that is inclusive of accessibility considerations of new hires.
- Continue disability-focused hiring and promotion work and reach, based on employment equity data, for all job levels within the Bank.
- Expand partnerships with a disability-serving organizations to increase application rate of persons with disabilities.
- Develop and deploy special training on disability and accessibility specific to Human Resources (“HR”), recruiters and hiring managers.

- 2025**
- Ensure that conversations with current and future employment/recruitment agencies include discussions regarding accessibility so that there is no bias against candidates who may be disabled by barriers around them.

- Moving forward**
- Develop documents and tools for hiring managers to enhance honouring language, awareness and support regarding people with disabilities.
 - Ensuring that test time allotment can be significantly increased during testing, as applicable.

Objective 2

- Promote a culture of inclusion that actively seeks to dismantle stereotypes.
- Ensure that workplace accommodation policies identify barriers and support accessibility for all employees.

Actions

- Ongoing**
- Reviewing our plans to ensure suitable coverage of a range of devices and assistive technologies.
 - Conducting individual interviews and focus groups with employees centered around a range of topics, including identifying any barriers to accessibility and generating ideas and plans for barrier removal.
 - Enhancing the self-identification survey through expanded definitions, notices of confidentiality and demonstrated commitment to build trust around disclosure of one's disability.

- 2024**
- Develop and standardize approaches to collecting accessibility-related feedback both internally and externally.
 - Develop further the barrier-removal process.
 - Research the universalization of assistive technology (screen readers, closed captioning and transcription, virtual note-taking tools) and provide that information when utilized, within first-day onboarding.
 - Deliver Disability Confidence Training informed by people with disabilities through means such as leveraging the support of our consultants, INNOVA, to assist in providing such training.

- 2025**
- Develop and launch an accommodation passport that will follow the employee throughout their employment journey at the Bank with no further paperwork or explanations required. This would also speed up the process of procurement of equipment or adaptive tools.
 - Provide additional disability training to all managers who have staffing responsibilities.

- Moving forward**
- Train multiple employees in HR to be accommodation specialists or retain external specialists to develop and deploy the best possible accommodations.
 - Develop a high-level accessibility metric to track overall change resulting from the accessibility plan and embed it (or similar metrics) into internal reporting.

Built environment

Equitable is committed to physical accessibility in all spaces (including our head office and all our regional offices) and has undertaken a review of the physical and sensory spaces used by the Bank. This work exists now and will be continuing.

As part of that work, we commit to not just making our own offices more accessible, but we are also endeavouring to work with the owners of buildings that we rent spaces in from time to time for various temporary purposes (for example, event and meeting spaces) in order to try to ensure these spaces are more accessible or otherwise endeavour to rent spaces which are more accessible.

Regarding our new head office currently under construction at 25 Ontario Street, we have been excited to create, from the ground up, offices that are extremely thoughtful and intentional when it comes to inclusion in all areas of our offices.

Objective

- Equitable Bank is committed to building and creating spaces that are accessible to all users: customers, employees and other stakeholders.

Ongoing:

- We are working with the Rick Hansen Foundation to create inclusive spaces within our new, upcoming head office at 25 Ontario Street. We continue to use their wisdom as the construction moves forward and are excited to have inclusive spaces be our standard in any future office spaces as well.
- In 2023, each of our office spaces (in Toronto, Vancouver, Calgary, Regina, Saskatoon, and Montreal) were evaluated in order to assess each built environment. As a result of these evaluations, we created an internal list of recommended remediations which we are currently working on accomplishing.

Actions

2024

- Ensure that alarm/evacuation system includes visual alarms.
- Commit to sharing inclusive procurement suppliers with building managers.
- Create a stronger communication system (possibly fire/building applications) to keep track of who on each floor needs support temporarily and permanently.

2025

- Ensure sensory barriers related to lighting, noise mitigation and strong scents in the workplace exist, and ensure that quiet, distraction free workspaces are available
- Ensure that storage, cabinetry, rooms within office spaces are fully accessible for employees who use mobility aids or face dexterity barriers.
- Build accessibility features throughout meeting rooms and other office spaces.

Moving forward

- Review and improve the process for any of our office space leasing to include accessibility requirements.
 - Ensure Equitable's sites have sufficient emergency evacuation plans for employees in need of assistance and maintain an updated list of staff who need temporary or permanent assistance.
-

Information and communication technologies (ICT)

As a digital bank, Equitable places high importance on improving accessibility of ICT, which will allow persons with disabilities and other Canadians to participate fully in our product and service offerings.

We strive to making Equitable's web pages and application even more accessible, and we have recently conducted a comprehensive assessment of Web, Mobile, and Mobile Web accessibility. The results of this audit have provided insights on how to improve accessibility on our sites and applications that we intend on utilizing in the future and has informed the action steps for ICT accessibility enhancement in our roadmap going forward. The results of the assessment are based on the Web Content Accessibility Guidelines 2.1 A &AA standards.

Objectives

- Ensure our website, apps and digital interfaces that we use are accessible for persons with diverse disabilities.
- Assess and implement improvement-based recommendations from the 2023 Digital Accessibility Audit that we undertook.

Actions

Ongoing

- Using a combination of automated testing and manual testing by Deque's senior accessibility team, to understand the accessibility issues. We have conducted a detailed audit of those screens and issues have been ranked based on severity and frequency of occurrence.
- Establishing a system of ticket assignment for progress tracking and bug reporting so that the highest priority tickets are remediated as soon as possible with the guidance and support of our consultants.
- Ensuring that new pages/new technology are assessed for access.

2024

- Develop further design specifications with our internal Quality Assurance and Development teams to prevent the occurrence of accessibility issues before release of new code across mobile and web applications.
- Ensure that disability access details are delivered in training modules taken by customer care staff.

2025

- Provide training to employees on how to use the assistive technology tools effectively.
- Ensure that staff training is available in multiple formats.

Moving forward

- Review the accessibility of all websites and applications, including platforms used by individual business lines, the intranet and any specialized applications.

Communication, other than ICT

Enhancing and promoting accessible communication across Equitable is critical and is key for developing confidence in our processes and operationalizing change.

Objectives

- Issue clear and transparent written communication to encourage full participation of people with diverse abilities.
- Having both internal and external documents available in multiple formats to ensure accessibility.

Actions

Ongoing	<ul style="list-style-type: none"> • Clarifying and standardizing available alternative formats (internally and externally), as well as timelines for providing these formats when requested.
2024	<ul style="list-style-type: none"> • Develop and deploy plain-language communication guidelines for internal and external documents. • Update existing communication policies to ensure they mention accessibility and people with disabilities.
2025	<ul style="list-style-type: none"> • Develop and deliver training for customer-facing employees to enhance interactions for clients with disabilities.
Moving forward	<ul style="list-style-type: none"> • Create an approved list of providers for American Sign Language (ASL) and Quebec Sign Language (LSQ) to ensure these services can be efficiently deployed as needed.

Design and delivery of programs and services

We are committed to enabling all employees to design and deliver accessible programs and services. To ensure that services are accessible, we will build upon existing customer service policies.

Objective

- Ensuring Equitable employees are equipped and empowered to design and deliver accessible offerings and services.

Actions

Ongoing	<ul style="list-style-type: none"> • Continuing to roll out unconscious bias training to new employees to ensure the staff has a fundamental understanding of how bias negatively impacts people's lives and long-term outcomes, including specifically people with disabilities. Enhancement of this program is ongoing.
2024	<ul style="list-style-type: none"> • Research the process of collecting data about clients with a disability and use data to tailor programs and services to enhance accessibility.
2025	<ul style="list-style-type: none"> • Ensure that disability-supportive technology is being updated as available, and that customer support staff are trained on utilizing that technology.
Moving forward	<ul style="list-style-type: none"> • Prioritize accessibility in the design and delivery of new products and services offered by the Bank.

Procurement of goods, services and facilities

We understand the collective responsibility in influencing society through the intentional inclusion of accessibility. We believe that by intentionally embedding accessibility within our procurement process, we can create purposeful engagement within our communities to promote barrier-free access to goods and services.

Objective

- Commit to expanding accessible company considerations with respect to purchasing of products and services.

Actions

Ongoing

- Commencing a review of our internal processes to identify any existing accessibility-related barriers in procurement.
- As part of our ongoing commitment, we have included diversity, inclusion and accessibility principles within our Third Party Code of Conduct. These principles are serving to guide or evaluation criteria during our procurement process and as we manage our relationships with our vendors on a regular basis.

2024

- Include statements on existing procurement documents to prioritize accessibility for vendor solicitations as a best practice.
- Request accessibility information and documentation of practices from vendors and contractors.
- Collect data for measurement of improvements to the procurement process.

2025

- Identify a list of providers of vendors who prioritize accessibility.
- Share that list with any inquirers to encourage expansion of support of these businesses.
- Integrate accessibility practices into procurement lifecycle, including Request for Proposal reviews.

Moving forward

- Ensure that accessibility considerations are added to procurement documents, including policies, checklists, templates and contracts.
- Document explanations and future remedies, when accessible procurement is not an option.

Transportation

Not Applicable as Equitable Bank does not provide transportation services as defined under the ACA.

Oversight, monitoring and reporting

In accordance with the ACA, Equitable will publish an updated Accessibility Plan every 3 years. Progress reports will be published every year in between, also in accordance with ACA where we will present an overview of the feedback we have received and how we have used it.

In conclusion

Undertaking the work of this Accessibility Plan at Equitable has never been thought of as an obligation, but rather an opportunity. An opportunity for us as an organization to do a thorough assessment of our policies, practices and practical approaches, to ensure we prioritize accessibility and include it within all the important work we do.

We are sincerely grateful that the Canadian government has created the Accessible Canada Act, as well as role of Chief Accessibility Officer, in its dedication to ensuring an accessible Canada by 2040. Or – with tenacity and nationwide sweat equity – even sooner. As it should be.