



Bill C-81 (An act to ensure a barrier free Canada)

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Commons Standing Committee
on Human Resources, Skill and
Social Development and the
Status of Persons with
Disabilities

Good morning. I would like to thank the Committee for inviting the Canadian Bankers Association to provide our comments on Bill C-81, *An Act to ensure a barrier free Canada*. The CBA is the voice of more than 60 domestic and foreign banks, and their 280,000 employees, that help drive Canada's economic growth and prosperity.

Canada's banking industry is pleased to support Bill C-81. The CBA was actively involved in the consultation process that led to this legislation, and we look forward to continuing to work with the government on the development of the regulations that will set the standards for accessibility in Canada.

During debate in the House of Commons, Minister Qualtrough stated that this legislation "is good for business and business knows that this is good for business". We agree. Canada's banks are leaders in providing accessible environments for their employees and customers. Banks are committed to treating all people in a way that allows them to maintain their dignity and independence. Banks believe in providing equitable opportunities through diverse and inclusive environments, and are committed to meeting the needs of people with disabilities by preventing and removing barriers to accessibility.

Banks have a considerable amount of experience with accessibility as it pertains to the work place and employees.

They offer individual solutions to employees with accommodation needs and have specialized departments to ensure they continue to foster an accessible work environment. Banks have moved accessibility mandates forward through various approaches including accessibility committees, policies and strategies, all with the goal to continuously work towards amplifying the voices of employees with disabilities.

Banks are also committed to ensuring accessible customer service. Most banks have groups with a dedicated accessibility mandate within their human resources and information technology functions. Putting the needs of their clients first, banks continue to make enhancements so they can offer barrier-free facilities and services in their branches, offices, bank machines, online and through mobile channels. Some examples of accessibility options provided by banks include: teletype technology for telephone banking; video relay service; sign language interpreters upon request; braille, large print and audio for various customer materials; enhancements at branches such as door operators, ramps and washroom upgrades; and accessibility features on computers and mobile devices, such as colour contrast and the ability to increase text size.

We believe that any federal accessibility framework should strike the right balance between being principles-based and prescriptive. The framework should also recognize that accessibility and accommodation are often person-specific. In areas where there is frequent technological evolution – such as information technology – overly prescriptive standards could be problematic. In general, we support widely-accepted standards that provide flexibility to institutions, customers and employees in order to achieve the intended outcomes, and that provide adequate certainty as to what constitutes compliance. Further, because standards may change frequently, particularly as technology evolves, the framework should provide organizations with the option to comply with the standard mandated in the legislation or an equivalent or higher standard.

Banks recognize that although significant progress has been made in making Canada more inclusive, people with disabilities still encounter barriers. The banks view accessibility as a journey, and continually work to improve the inclusive design of their products and services.

We are happy to answer any questions you may have.