White Label Materials:

User Guide

## This document contains instructions for firms interested in adapting the white label materials for use.

These white label materials are provided as part of the enhanced education and outreach activities the Ontario Securities Commission (OSC) committed to in [OSC Staff Notice 11-779 *Seniors Strategy*](https://www.osc.ca/sites/default/files/pdfs/irps/sn_20180320_11-779_seniors-strategy.pdf) (OSC Seniors Strategy).

The materials are intended to be a resource that firms may refer to or choose to adapt, brand and deploy to their representatives and clients at their discretion, which may mitigate the burden of developing materials entirely independently in their efforts to enhance protection of older and vulnerable clients and serve them in an informed and respectful manner.

The white label materials reflect the learnings of the OSC; content has been drawn from the [amendments to National Instrument 31-103 *Registration Requirements, Exemptions and Ongoing Registrant Obligations* and its Companion Policy to enhance protection of older and vulnerable clients](https://www.osc.ca/sites/default/files/2021-07/ni_20210715_31-103_ongoing-registrant-obligations.pdf), published on July 15, 2021, and prior publications such as [CSA Staff Notice 31-354 *Suggested Practices for Engaging with Older or Vulnerable Clients*](https://www.osc.ca/sites/default/files/pdfs/irps/csa_20190621_31-354_suggested-practices-for-engaging-with-older-or-vulnerable-clients.pdf).

Disclaimer

These white label materials are not to be construed as regulation or guidance. While these materials have been prepared to assist firms, should a firm elect to adapt, brand and deploy any of the information or forms in any way, it should be understood that all content becomes the sole and exclusive responsibility of the firm electing to use it, for legal, regulatory and compliance purposes. The materials are offered as a resource only. Firms must carefully review all content and are responsible for conducting their own legal reviews, as may be necessary, to ensure compliance with applicable laws and regulations.

## Content

The white label materials include a series of 4–6 page leaflets covering the following topics:

1. Working respectfully with older and vulnerable clients
2. Identifying and responding to signs of financial exploitation
3. Identifying and responding to signs of diminished mental capacity
4. Trusted contact person (TCP)
5. Placing a temporary hold in instances of financial exploitation or diminished mental capacity
6. Additional resources

Document 4a includes content for a form titled, “You’re my trusted contact person”, which you may wish to share with your clients to complete and provide to the individual they name as their TCP. The form provides information about the role of a TCP, as well as the contact information of the firm and representative that may contact the TCP about the client.

## Adapting these documents for use

Areas where firms are prompted to enter specific information are highlighted in yellow (e.g., [FIRM] for the name of a firm or [TITLE] for the title used by a firm’s registered representatives).

In addition to these prompts, firms may adapt the material to incorporate their own expertise and respond to the educational needs of their representatives. This may include revising the titles of leaflets to provide adequate context, inserting visual aids or images or providing practical real-world examples that will help representatives engage with the content and apply what they have learned.

While key accessibility considerations are summarized in these instructions, firms are also encouraged to apply their own knowledge and best practices.

## Accessibility

**AODA** ([Accessibility for Ontarians with Disabilities Act](https://www.ontario.ca/page/accessibility-ontario-what-you-need-to-know)) is Ontario’s law for organizations to follow standards to make services, including communications, accessible to everyone.

When editing this template, please follow accessibility best practices to keep the information as accessible as possible.

In general, accessibility for communications in Word documents includes:

**Design.** Examples: font size; colour contrast; ensuring information is not only conveyed through use of colour.

**Content.** Examples: clarity in writing; descriptive links.

**Technical features.** Examples: ensuring non-decorative images have alt (alternative) text to describe the visual; proper use of formatting features (heading styles, lists, tables, etc.).

## External resources

* Microsoft:
  + [Make your Word documents accessible to people with disabilities](https://support.microsoft.com/en-us/office/make-your-word-documents-accessible-to-people-with-disabilities-d9bf3683-87ac-47ea-b91a-78dcacb3c66d?ui=en-us&rs=en-us&ad=us)
* DAISY:
  + [Creating accessible Word documents](https://daisy.org/info-help/guidance-training/daisy-tools/creating-accessible-word-documents/)
* WebAIM:
  + [Microsoft Word: Creating accessible documents](https://webaim.org/techniques/word/)