

HARDY CLASS ACTION/FEDERAL INDIAN HOSPITALS  
CLAIMANT SUPPORT PROGRAM

1. INTRODUCTION

- a. This plan outlines the Claimant Support Program (the Program), developed in accordance with section 3.02(2) of the Settlement Agreement to assist Claimants (including Heir Claimants) and Representatives during the Claims Process. The Program describes how trauma-informed and culturally safe support will be provided, the roles and responsibilities of the organizations involved, the safeguards in place to maintain separation from adjudication and legal advice, and the processes for accessibility, inclusion, and program evaluation. Its purpose is to ensure that Claimants and Representatives have clear information and appropriate assistance and supports to participate in the Settlement.
- b. The Program will be established to ensure that individuals are not required to navigate the Indian Hospitals Settlement process on their own and is founded on principles of compassion, cultural safety, and trauma-informed practice. It will provide Claimants with clear and accessible information, as well as individualized assistance, to support their participation in the Settlement process.
- c. In recognition that the claims process may be inherently re-traumatizing, the Program seeks to support Claimants in a manner that minimizes harm, respects and honours their lived experiences, and supports their pursuit of justice and healing.
- d. While the Phase II Notice Plan provides general awareness and information about the Settlement, the Claims Process and the resources and supports available, this Program is intended to provide direct, trauma-informed, culturally safe assistance to Claimants. This includes:
  - i. the Settlement Agreement and their rights to receive compensation under it;
  - ii. the criteria for eligibility to receive compensation;
  - iii. the Claims Process and timeline;

- iv. direct notice through community information and claim sessions;
- v. direct assistance in completing their Claim Form;
- vi. support in responding to requests from the Claims Administrator for additional information;
- vii. how to access individual legal support for assistance with their Claim; and
- viii. how to access available mental health and wellness resources and supports.

## 2. OBJECTIVES

- a. The Program is designed to ensure that Primary Class Members, Heir Claimants and their Representatives (Estate Representatives and Personal Representatives for Persons Under Disability or for Heir Claimants who are Minors or Persons Under Disability) receive respectful, accessible, and culturally appropriate support throughout the Claims Process through the following objectives:
  - b. **Increase access to information.** In addition to the Notice Plan, ensure Claimants and Representatives have clear and culturally appropriate access to accurate information about the Settlement Agreement, eligibility, the Claims Process, and available supports.
  - c. **Support completion of the Claim Form.** Provide direct, individualized assistance to Claimants and Representatives in understanding and completing the Claim Form. This includes reducing barriers to submission, supporting navigation of required information, and offering assistance with status checks or follow-up requests from the Claims Administrator. This includes providing clear guidance for Estate Representatives, Heir Claimants, and Personal Representatives about their role and the documents required.
  - d. **Promote community engagement and trust.** Facilitate community-based engagement activities, including information sessions and outreach efforts, to

promote understanding of the Claims Process and to strengthen trust among Claimants and Representatives, communities, and support personnel involved in the implementation of the Settlement Agreement.

- e. **Offer flexible and inclusive support options.** Ensure that a range of support methods are available to meet the diverse needs and preferences of Claimants and Representatives. These may include in-person sessions, phone support, virtual appointments, and assistance in Indigenous languages or through bilingual staff, where available.
- f. **Uphold cultural safety and minimize harm.** All support provided must reflect the principles of cultural safety, compassion, and respect. Claims Helpers and related personnel will work to minimize the emotional burden associated with participation in a legal process by recognizing the varied experiences of harm, trauma, and systemic barriers that Claimants and Representatives may carry.

### 3. ABOUT THE CLASS

- a. Detailed information about the Class and factors impacting the delivery of notice can be found in the Notice Plan. In providing direct assistance to Claimants and Representatives, additional considerations include:
  - i. **Reaching the Class.** Given the span of years and geographic spread of Federal Indian Hospitals, Claimants and Representatives may be located across Canada and internationally. Many Class Members may not live near the Federal Indian Hospital where they were admitted, and in some cases may not have shared their experience with their families or communities, adding further sensitivity to engagement.
  - ii. **Community engagement and permission.** It is important to work with communities before services are offered. Supports must be grounded in gaining permission from leadership, Elders and/or community representatives.
  - iii. **Historical context and predatory practices.** Class Members who experienced harm at Federal Indian Hospitals may have had similar

experiences at other institutions creating a backdrop of trauma and mistrust. Predatory practices have also emerged in other Settlements with lawyer and consultants charging fees for services that should be free. Communications must be designed to ensure that Claimants and Representatives recognize that the Claimant Support Program is safe and trustworthy by leveraging community connections, distinguishing the Program from predatory practices, emphasizing that Claimant Supports are free and that they are a part of the Settlement.

- iv. **Community protocols and local priorities.** Protocols vary across communities and must be respected. Engagement and support activities should avoid conflicts with ceremonies, funerals, elections, seasonal practices and other community events. Flexibility in scheduling and responsiveness to community direction is critical.
- v. **Access and infrastructure.** Many Claimants and Representatives live in rural and remote areas where access to information and services is most difficult, yet most needed. Barriers include limited transportation, unreliable utilities, and poor Internet and phone connectivity.
- vi. **Language and cultural requirements.** Claimant support must be provided in English and French, with Indigenous languages available as needed in the correct dialect. Plain language and trauma-informed communication must be used to overcome barriers and reduce retraumatization.
- vii. **Modes of support.** To reduce barriers to participation, Claimant support should be designed to meet Claimants and Representatives where they are and feel most comfortable. This includes offering multiple avenues for receiving information, asking questions, and getting help with their Claims in one session or call. Supports will be flexible, recognizing that some people may prefer to connect over the phone or virtually, while others need in-person approaches

- viii. **Generational and emotional impacts.** Some Claimants may never have shared their experiences in Federal Indian Hospitals with others. Claimant support will need to include referrals to appropriate mental health, wellness and cultural supports as well as appropriate escalation protocols.
- ix. **Removing barriers to participation.** Barriers such as language, literacy levels, lack of awareness, technology gaps, and mistrust must be proactively addressed. Supports must be trauma informed, culturally appropriate, accessible, free of charge and confidential.
- x. **Unique challenges for Representatives.** At times, Claims may be submitted by an Estate Representative, an Heir Claimant, or a Personal Representative. These individuals may face unique barriers in accessing documents, confirming their authority, or navigating the Claims Process, and may require tailored assistance.

#### 4. APPROACH

- a. The Program will be delivered throughout the Claims Period to ensure that Claimants and Representatives are not required to navigate the Claims Process on their own. The purpose of the Program is to provide respectful, trauma-informed, and culturally grounded assistance, recognizing the emotional and logistical challenges many Claimants and Representatives may face in engaging with a legal process. Supports are designed to minimize the risk of retraumatization, enhance access to accurate information, and provide appropriate information, support and referral to mental health, wellness and cultural supports at each stage of the process.
- b. In addition to serving Primary Class Members, the Claimant Support Program provides assistance to Estate Representatives, Heir Claimants, and Personal Representatives supporting a Person Under Disability or an Heir Claimant who is a Person Under Disability or a Minor. These Representatives have distinct responsibilities under the Settlement Agreement, the Estates Protocol, and the Claims Protocol, and may require guidance to gather documents, understand

required steps, and respond to follow-up requests. Claims Helpers will offer clear, culturally grounded, trauma-informed support to help Representatives and Heir Claimants complete and submit the Claim Form, understand what information is required, and access mental health and wellness resources as needed. This ensures these Representatives, Heir Claimants and Class Members who cannot act for themselves continue to receive respectful, accessible support.

- c. Assistance will be available through a national network of trained Claims Helpers who will support Claimants and Representatives in completing Claim Forms, understanding the eligibility criteria, and navigating the Claims Process. Support will be offered in multiple formats, including in-person assistance, virtual and telephone-based guidance, outreach and information sessions, and targeted supports for individuals facing barriers to access. All services will be delivered in a manner that prioritizes emotional safety, plain-language communication, and cultural relevance.
- d. The Program will include structured pathways for wellness referrals, including access to the Hope for Wellness Helpline and other culturally appropriate services funded through Indigenous Services Canada. Where a Claim is submitted by an Estate Representative, Heir Claimant, or Personal Representative, wellness supports will also be available to them as needed. In-community sessions will incorporate Elder and mental health support where appropriate, and all Claimant-facing staff will be trained in trauma-informed practice and cultural safety. Urgent wellness concerns will be addressed through established crisis response protocols..
- e. The Program will be managed by a multidisciplinary support team with expertise in training, recruitment, logistics, wellness, human resources, evaluation, and compliance. This includes a core team of Claims Helpers with national coverage, supported by surge staff and special populations personnel. Staff will be equipped with the necessary tools, supervision, and wellness supports to deliver services responsibly and sustainably. Many members of the delivery team will have lived or relational experience with Indigenous settlements or institutional harms.

- f. Delivery will be continuously monitored through a structured evaluation framework. Both quantitative and qualitative data will be collected to assess service quality, reach, and responsiveness. Evaluation will be guided by trauma-informed principles and Indigenous data sovereignty, including the OCAP® standards of Ownership, Control, Access, and Possession.
- g. In recognition of the diverse needs of the Class, the Program will include tailored approaches for Elders, individuals with language or literacy needs, urban residents, persons in custody or institutions, and others experiencing systemic or structural barriers. Priority populations and community session locations will be identified through engagement with Indigenous communities, service providers, and historical connections to the Federal Indian Hospitals listed in Schedule D of the Settlement Agreement.

## 5. DELIVERY

### a. Telephone support with mobile teams

- i. The Claimant Support Program will launch with a bilingual, trauma-informed information line and telephone Claimant Support available from the outset of the Claims Period. In-person services would be introduced early in the Claims Period through the deployment of mobile Claimant Support teams. These teams would travel to approximately 43 communities to be determined through collaboration with Canada. Each mobile team would remain in the community for approximately one to two weeks, during which they would conduct information sessions, provide direct claims form assistance, and respond to claimant inquiries.
- ii. Community engagement would be undertaken during the planning phase and would continue throughout the project to confirm community priorities, maintain open communication, and build trust. Relationship-building with local leadership and organizations would be emphasized during each visit. In addition, outreach would include targeted engagement with local Facebook community groups to share updates and information.

iii. Benefits

1. Efficient use of program budget, concentrating in-person resources in a planned and predictable manner.
2. Provides extended in-community presence (one week per community) that allows for sustained relationship- and trust-building.
3. Ensures consistent delivery of information and assistance at each visited site.

iv. Challenges

1. In-person support is limited to selected communities, leaving Claimants in other areas reliant on information available online, shared with community leaders and organizations and through the Claimant Support Line.
2. Communities not selected may perceive inequity in access to in-person services, which could undermine trust.
3. Lower overall reach, which may limit the program's ability to fully address barriers for populations with specific needs.

b. The following series of tactics and activities would be used to deliver the Program. Additional tactics and approaches may be recommended as required.

- i. **Website.** The Settlement website will include specific sections for Claimant Support, providing information and resources, interactive tools (such as eligibility information tool, webchat), calendar of events with registration, past presentation recordings, and requests for Claimant Support (in line with service delivery types noted within).
- ii. The **Claimant Support Line** will be accessible toll-free through the primary information number (1-888-592-9101) IVR menu. This line is a

central access point for Claimants and Representatives to receive assistance related to the Settlement. Claimants and Representatives will be able to select to speak to the Claims Administrator or the Claimant Support Line.

iii. The dedicated Claimant Support Line will:

1. Operate **Monday to Friday, from 8:00 a.m. to 8:00 p.m. Eastern Time**, excluding statutory holidays;
2. Be staffed by trained personnel providing **bilingual (English and French)** support;
3. Respond to inquiries about:
  - a. The Claims Process and how to complete the Claim Form
  - b. Eligibility definitions as outlined in the Settlement Agreement
  - c. Specific requirements for Estate Representatives, Heir Claimants and Personal Representatives
  - d. Warm transfer to the Claims Administrator for Claim status information
  - e. Where and how to obtain ID and other documents required for Representatives and Heir Claimants
  - f. Accessing health and wellness support
4. Referrals to available information on how to hire a Lawyer or obtain legal advice; and
5. Arranging additional support (e.g. call-backs in Indigenous languages where available).

6. Where additional support is required, callers may be offered a warm transfer to a **Virtual Claims Helper** or scheduled for a follow-up call based on their needs and preferences.
- iv. **Virtual Claims Helpers**, staffing the Claimant Support Line will provide one-on-one support to Claimants and Representatives across Canada. This service ensures that Claimants can receive direct assistance without needing to travel, and is especially important for individuals living in rural, remote, or urban areas where in-person services may not be available. Virtual Claims Helpers will:
1. Be available by phone or video, based on the Claimant's preference and comfort;
  2. Aid in both English and French, with arrangements for call-backs in Indigenous languages where possible;
  3. Support Claimants in completing the Claim Form, including explaining each section, reviewing the information provided, and ensuring it is ready for submission;
  4. Answer questions about the Claims Process and definitions of eligibility, based on information contained in the Settlement Agreement;
  5. Support Representatives and Heir Claimants in understanding the documentation and submission requirements according to their role
  6. Facilitate access and referrals, or warm transfers to legal, wellness, or additional support services as needed; and
  7. Facilitate warm transfer to the Claims Administrator for Claimants who are seeking updates or status checks.

v. **Community relations and engagement.** Community engagement activities will be carried out as part of the Program to foster trust, strengthen awareness of available supports, and identify specific needs among Claimants and Representatives. These activities are grounded in a trauma-informed, culturally respectful approach that recognizes the diversity of experiences, histories, and access barriers faced by Claimants. Engagement will focus on reaching Claimants and Representatives who may benefit from tailored support, including but not limited to: Elders; individuals with limited literacy; those who require services in Indigenous languages, Claimants and Representatives living in remote or urban locations with limited access to services; and individuals experiencing housing insecurity or institutionalization. Planned engagement activities may include:

1. Outreach to local and regional organizations trusted by community members;
2. Dialogue with community leaders, Elders, and knowledge holders;
3. Partnerships with health, wellness, and service organizations to support shared delivery of information and assistance; and
4. Participation in community events, gatherings, or public information sessions where appropriate.

vi. **Information sessions** will provide Claimants and Representatives with accurate, plain-language information about the Settlement Agreement, the Claims Process, the Claim Form (for Class Members, Heir Claimants and Representatives) and available supports. Sessions will be delivered in two ways:

- a. As part of a planned outreach strategy, targeting key populations and regions with identified needs; and
- b. In response to specific community requests, subject to operational capacity and budget availability.

2. Both virtual and in-community formats will be offered, ensuring flexibility and accessibility for diverse Claimant and Representative groups, including those in remote or urban areas, Elders, and individuals with language or literacy needs.
  3. Sessions will be capped annually based on budgeted allocations and available personnel. A yearly delivery plan will be developed to ensure equitable access while managing resources responsibly. Session data will also contribute to the broader notice strategy, ensuring that outreach continues to reach underserved communities and supports Claimants and Representatives in accessing their rights under the Settlement Agreement.
- vii. **In community Claims Assistance sessions.** Up to 43 in-community Claims Assistance sessions may be offered across Canada over the duration of the Claims Period. These sessions are designed to provide Claimants and Representatives with safe, in-person support in completing their Claim Forms, understanding the Claims Process, and accessing legal and wellness-related referrals.
1. All sessions will be coordinated in partnership with the communities in which they are held, including meaningful engagement with community leadership, service providers, Elders, and knowledge holders. Planning will be informed by local priorities, with attention to cultural protocols, preferred venues, and language needs.
  2. Locations for these sessions will be collaboratively identified based on:
    - a. The historical location and surrounding regions of the former Federal Indian Hospitals listed in Schedule D of the Settlement Agreement;

- b. Areas where Class Members are likely to reside in significant numbers;
  - c. Known barriers to access for virtual or phone-based supports, including lack of internet, low literacy, or housing instability; and
  - d. Requests from communities or organizations, subject to available resources and operational capacity.
3. Selection of communities will be confirmed with Canada and Class Counsel and focus on those areas with potential high population of Class Members or areas experiencing barriers to participation.
4. Each in-community session will:
- a. Be planned with the involvement of local leadership, Elders, and service partners;
  - b. Be staffed by trained Claims Helpers providing trauma-informed, one-on-one support;
  - c. Include the presence of Elders, cultural support persons, and mental health supports appropriate to the region;
  - d. Provide plain-language explanations of the Settlement Agreement, Class definitions, and Claims Process;
  - e. Offer assistance with completing and reviewing Claim Forms for Claimants and Representatives;
  - f. Facilitate warm referrals to Class Counsel and wellness services, including the Hope for Wellness Helpline;
  - g. Be delivered in a culturally respectful and emotionally safe manner, with attention to the trauma that may be resurfaced through participation; and

- h. Respect and accommodate local language needs, including bilingual service or interpretation where possible.

viii. **Community Events, Fairs, and Exhibits.** The Program may include participation in select national and regional events that are expected to reach significant numbers of Claimants and Representatives. These may include, but are not limited to:

1. The Assembly of First Nations Annual General Assembly and Special Chiefs Assemblies;
2. Métis Governments' annual meetings or gatherings;
3. Inuit Tapiriit Kanatami and Inuit Treaty Group gatherings;
4. Major events hosted by the National Association of Friendship Centres (NAFC) and its affiliates; and
5. Other high-attendance Indigenous-led forums or community gatherings identified in consultation with Indigenous partners such as Indigenous health professional associations.

ix. **Event-Specific Promotion and Outreach.** For events where the Claimant Support Program is present, either in person or virtually, targeted communications efforts will be undertaken to promote awareness, encourage attendance, and support engagement. All efforts will be made to coordinate these activities with the implementation of the Notice Plan; however additional activities may include:

1. Tailored digital and print advertisements in advance of specific events;
2. Targeted community outreach to service providers and Indigenous organizations in the host region;

3. Use of local radio, newsletters, and posters where appropriate;  
and
4. Follow-up outreach after the event to respond to questions or requests for more support.

c. **Community-Based Facebook Outreach.** In addition to the national digital notice campaign, the Program will implement a Facebook outreach initiative to reach Indigenous audiences where they already gather for news, updates, and community connection. This outreach channel is particularly important for reaching Indigenous adults over 40, who are more likely to use Facebook than other digital platforms. It also supports two-way communication, allowing for real-time clarification and community-specific adaptation of messaging. This activity will be monitored for reach and impact and will complement, not replace, formal notice and other communications efforts. This involves:

- i. Identifying and connecting with administrators of local and community-run Facebook groups;
- ii. Requesting permission to share approved posts or updates related to the Claims Process and available supports;
- iii. Sharing referral information for Claims Helpers, legal supports, and wellness services; and
- iv. Responding to questions in a respectful and non-directive manner, and referring individuals to the Claims Administrator as appropriate.

## 6. CLAIMS HELPERS

a. Claims Helpers are individuals who provide direct support Claimants and Representatives during the Claims Process established under the Federal Indian Hospitals Settlement. Their role is grounded in trauma-informed and culturally safe practices, with a focus on reducing barriers to participation for Claimants and Representatives. Claims Helpers may assist by:

- i. Providing information about the Claims Process in a manner that is trauma-informed, culturally appropriate, and respectful of individual experience;
  - ii. Assisting Claimants and their representatives to understand the structure and purpose of the Settlement Agreement, including the definitions of Primary Class Members and Family Class Members;
  - iii. Offering guidance on how to locate or prepare basic materials needed to complete a Claim Form;
  - iv. Explaining the steps to complete and submit a Claim Form and, where appropriate, assisting Claimants in filling out their Claim Form;
  - v. Helping Representatives and Heir Claimants understand their role in the Claims Process on behalf of a deceased Class Member, a Minor or a Person Under Disability;
  - vi. Facilitation of warm transfers to the Claims Administrator for status checks on submitted Claims;
  - vii. Referrals to available information on how to hire a Lawyer or obtain legal advice as well as available mental health, wellness and cultural ; and
  - viii. Providing information to Claimants and Representatives regarding their rights to retain an individual lawyer should they choose that option.
- b. Claims Helpers are not authorized to:
- i. Determine whether a person is eligible to receive compensation;
  - ii. Submit Claim Forms on behalf of a Claimant;
  - iii. Offer legal advice or opinions;
  - iv. Offer information on outcomes or decisions of submitted Claims;

- v. Offer clinical or therapeutic support; and
  - vi. Support Claimants in other class actions beyond sharing general information (such as website or phone number).
- c. Claims Helpers work within specific following principles:
- i. Cultural safety and humility, recognizing the histories, languages, and perspectives of Indigenous Peoples;
  - ii. Compassion and empathy, with awareness of the ongoing impact of institutional abuse;
  - iii. Person-centred support, emphasizing dignity, choice, and informed decision-making;
  - iv. Relationship-building, rooted in trust, transparency, and respect; and
  - v. Trauma-informed practice, designed to reduce harm and avoid re-traumatization.
- d. Types of Claims Helpers include:
- i. **Claimant Support Line Helper.** A toll-free phone line (1-888-592-9101) available to all Claimants and Representatives. Staffed by trained personnel who offer bilingual, trauma-informed assistance, answer questions, arrange warm transfers to the Claims Administrator, and refer callers to Virtual Claims Helpers, Class Counsel and mental health and wellness supports as needed.
  - ii. **Telephone Claims Helpers.** Provide one-on-one support by phone. Help Claimants and Representatives across Canada complete their Claim Form, understand their eligibility, receive guided support for status checks, and access referrals, without needing to travel.
  - iii. **Special Populations Claims Helpers.** Specially trained to support Claimants and Representatives facing barriers such as incarceration,

housing instability, or institutional settings. They provide adapted Claim support and outreach in contexts where standard delivery may not be accessible.

- iv. **In-Person Claims Helpers.** Deliver face-to-face support during community-based Claims Assistance Sessions or other in-person outreach. Help with form completion, answer questions, provide referrals, and support Claimants in a safe, culturally grounded setting.
  - v. **Senior Claims Helper Leaders.** Provide oversight, supervision, and mentorship to the Claims Helpers team. Ensure quality of support, consistency of information, staff wellness, and alignment with trauma-informed and cultural safety principles across all channels.
- e. Training is essential to ensuring consistent, trauma-informed delivery of the Program. Claims Helpers will participate in a comprehensive, four-stage training program designed to ensure they deliver safe, accurate, and culturally grounded assistance to Claimants and Representatives.
- i. The first stage focuses on foundational learning, including trauma-informed practice, cultural safety, and the historical and ongoing impacts of colonialism and systemic harm. Claims Helpers will also gain a general understanding of class actions and the emotional weight many Claimants may carry as they come forward.
  - ii. The second stage provides Settlement-specific training, including a detailed overview of the Settlement Agreement, compensation categories, eligibility criteria, and the history of the Indian Hospitals system. This stage ensures that every Claims Helper understands not only the technical components of the process, but also the lived experience behind the class proceeding.
  - iii. The third stage focuses on the Claim Form itself, training Claims Helpers to provide clear, compassionate support in completing forms, understanding procedural steps, and requirements for Claimants and

Representatives and offering warm referrals to legal, wellness, or administrative supports as needed.

- iv. The fourth stage centres on continuous learning. Claims Helpers will participate in regular team debriefs, refresher sessions, and peer-led learning opportunities. This ongoing development will help address emerging issues, improve Claimant experiences, and strengthen the emotional and professional resilience of Claims Helpers over time.
- f. The Claimant Support Program will include structured wellness supports for Claimants, Representatives and Claims Helpers.
  - i. Class Members, Heir Claimants and Representatives will have access to trauma-informed, culturally grounded assistance, including referrals to existing wellness services such as the Hope for Wellness Helpline, as well as Elder and cultural support during in-community sessions. In addition, Class Members and their family members may access the health and cultural supports funded through Indigenous Services Canada under the terms of the Settlement Agreement.
  - ii. Claims Helpers will receive training on vicarious trauma, access to mental health resources, regular wellness check-ins, and supervision to help manage the emotional impact of their role. These measures are in place to help ensure a safe, respectful, and sustainable environment for all individuals involved in the delivery of the Settlement.

## 7. ACCESSIBILITY AND INCLUSION

- a. The Program will be designed to ensure barrier-free participation for all Claimants and Representatives, in keeping with the principles of section 3.02(2) of the Settlement Agreement, which requires a trauma-informed and culturally safe process for assisting Claimants and Representatives during the Claims Process. The Program also reflects the standards established under the Accessible Canada Act and the Government of Canada's inclusion policy, which

emphasize dignity, equality of opportunity, full participation, and the removal of barriers.

- b. **Persons with Disabilities.** Services will be adapted for Claimants and Representatives with physical, sensory, or cognitive disabilities. Alternative formats such as large print, plain language, and accessible digital documents will be provided upon request. In-person sessions will be held in physically accessible venues and accommodations such as assistive technologies or interpretation will be arranged where required.
- c. **Accessible information and communication.** Settlement materials and resources referenced in the Claimant Support Program, including information on eligibility and the Claim Form, will be provided in plain language to support Claimants with varying literacy levels. Digital tools used under the Program will meet recognized accessibility standards and be compatible with screen readers and other assistive technologies.
- d. **Cultural and linguistic inclusion.** Consistent with section 3.02(2) of the Settlement Agreement, supports will be trauma-informed and culturally safe. Services will be available in English and French, with interpretation in Indigenous languages provided if needed. In-community sessions will respect local cultural protocols and may include Elders, Knowledge Keepers, or mental health supports, as appropriate to the community.
- e. **Diverse identities and family roles.** The Program will be inclusive of Claimants and Representatives with diverse identities, including Two-Spirit, LGBTQIA+, and gender-diverse individuals, and will ensure that staff are trained to provide safe and respectful support. Recognizing that family members often assist Claimants, the Program will accommodate intergenerational support while preserving the autonomy and confidentiality of the Claimant.
- f. **Urban, rural, remote, and northern access.** The Settlement Agreement requires that assistance be accessible through in-person, virtual, and hybrid sessions. The Program will therefore be delivered through multiple modes to reach Claimants and Representatives in urban centres, rural areas, and remote

and northern communities. Partnerships with trusted local organizations will be used to reduce barriers in communities with limited infrastructure, transportation, or connectivity.

- g. **Feedback and continuous improvement.** Mechanisms will be established for Claimants to identify barriers encountered in accessing support services. Accessibility will be reviewed regularly and adjustments made to remove barriers, in line with both the Settlement Agreement and the principles of the Accessible Canada Act.

## 8. PLANNING, DELIVERY, LOGISTICS

- a. The Program will be supported by a coordinated set of services to ensure safe, accessible, and culturally grounded assistance is available to Claimants and Representatives across all streams of delivery. Planning and design activities will be informed by trauma-informed principles, Indigenous engagement, and the historical context of the Federal Indian Hospitals. Recruitment and onboarding processes will be in place to engage qualified staff, including bilingual and culturally grounded Claims Helpers, Elders, and wellness supports.
- b. Digital systems, including a secure Client Relationship Management (CRM) platform, will be used to track service delivery, referrals, and follow-up, while protecting privacy and supporting accountability. Evaluation and reporting tools will allow for continuous improvement based on Claimant feedback and program data. Compliance measures are embedded throughout, including protocols for confidentiality, privacy, accessibility, IT security, and risk management. Together, these components ensure the program will be delivered in alignment with the Settlement Agreement and the needs of Claimants and Representatives.

## 9. MEASUREMENT AND EVALUATION

- a. The Program will include a structured framework for monitoring and evaluation to ensure that services are delivered in accordance with section 3.02(2) of the Settlement Agreement and remain trauma-informed, culturally safe, and accessible. The framework is designed to assess both the reach and the quality

of services, while respecting the dignity and privacy of Claimants and Representatives, and includes:

- i. **Service Reach.** Data will be collected on the number and distribution of Claimants served across in-person, virtual, and telephone channels, with particular attention to access in rural, remote, and northern communities.
- ii. **Service Quality.** Claimant feedback, staff observations, and community input will be used to evaluate the clarity, cultural safety, and trauma-informed nature of the support provided.
- iii. **Accessibility and Inclusion.** Monitoring will include the identification and removal of barriers consistent with the Accessible Canada Act, including those affecting persons with disabilities, linguistic minorities, and individuals with diverse identities.
- iv. **Methods.** Quantitative and qualitative data will be gathered in a way that avoids retraumatization and ensures voluntary participation. Indigenous data sovereignty will be respected, including adherence to OCAP® principles of Ownership, Control, Access, and Possession where applicable. Feedback mechanisms will allow Claimants and Representatives to raise concerns or accessibility issues directly and confidentially.
- v. **Reporting.** Regular reports will be provided to the Parties and, where required, to the Court, detailing program reach, service quality, accessibility efforts, and emerging needs. An annual evaluation summary will identify outcomes achieved, recommend improvements, and demonstrate ongoing compliance with section 3.02(2) of the Settlement Agreement.

## 10. GOVERNANCE

- a. The Program will be administered by Castlemain. Castlemain is responsible for the design, management, and delivery of the Claimant Support Program in

alignment with the Settlement Agreement and under the oversight of the Parties and the Court.

- b. Planning and delivery will be carried out by a multidisciplinary team of Claims Helpers, program managers, and wellness support staff recruited and trained by Castlemain. All services will be provided in a manner consistent with trauma-informed and culturally safe principles. Castlemain will ensure that support services remain entirely distinct from the adjudicative role of the Claims Administrator and the legal advisory role of Class Counsel or other legal counsel.

- c. **Roles and Responsibilities**

- i. **Castlemain.** Responsible for the recruitment, hiring, training, and supervision of Claims Helpers and related staff, as well as the coordination of all Claimant Support services. Castlemain will:

- 1. Provide accurate, plain-language information about the Settlement Agreement, eligibility definitions, and the Claims Process In English and French with Indigenous languages available as needed.
    - 2. Assist Claimants and Representatives in completing Claim Forms and in responding to requests from the Claims Administrator.
    - 3. Facilitate referrals and warm transfers to the Claims Administrator.
    - 4. Provide information on accessing legal supports or hiring a lawyer as well as referral to mental health, wellness and cultural supports available.
    - 5. Ensure compliance with privacy, confidentiality, and security requirements.
    - 6. Monitor, evaluate, and report on Program delivery.

7. *Limitations*: Castlemain and its Claims Helpers will not provide legal advice, adjudicate eligibility, determine compensation outcomes, give information about outcomes, or submit Claim Forms on behalf of Claimants.
- ii. **Claims Administrator**: The Claims Administrator remains solely responsible for the receipt and adjudication of Claim Forms, including determining eligibility and compensation, issuing decisions, and maintaining secure records of all Claims. Claimants seeking information or decisions about eligibility or outcomes will be referred directly to the Claims Administrator.
- iii. **Class Counsel**: Class Counsel is responsible for facilitating the Claimant Support process. Where Claimants raise legal questions, Castlemain will facilitate a referral or warm transfer to Class Counsel.
- iv. Canada will approve annual budgets and provide relevant information to inform the development of the Claimant Support Program as well as forward specific requests for supports to Castlemain.

## 11. RISK MANAGEMENT

- a. The Program incorporates structured safeguards to protect Claimants and Representatives, maintain the integrity of the Settlement, and support the wellness of those delivering services. These safeguards address risks related to fraud, privacy, boundaries of authority, and the emotional impact of participation.
- b. **Fraud Prevention and Identity Protection**
  - i. Claims Helpers will not handle or collect original identity documents; instead, they will provide guidance on how to obtain or submit identification directly to the Claims Administrator.
  - ii. Clear communication will be provided to Claimants and Representatives that all Claimant Support services are free of charge. This is intended to

prevent predatory practices such as unauthorized consultants charging fees for services.

- iii. Standardized scripts, checklists, and protocols will be used to ensure consistent and accurate information is provided.
- iv. Any suspected fraudulent activity will be reported immediately to the Claims Administrator in accordance with established protocols.

**c. Privacy and Confidentiality**

- i. All staff will be trained in privacy obligations and will operate under strict confidentiality protocols.
- ii. A secure Client Relationship Management (CRM) platform will be used to track service interactions, with access limited to authorized personnel and subject to privacy and security safeguards.
- iii. Information will be transferred to the Claims Administrator and/or Class Counsel only with the informed consent of the Claimant and in compliance with applicable privacy laws and the Settlement Agreement.

**d. Boundaries of Authority**

- i. To avoid confusion between support, adjudication, and legal functions, Claims Helpers will operate under strict role definitions. They will not provide legal advice, adjudicate eligibility, or submit Claim Forms on behalf of Claimants.
- ii. Protocols for referrals and warm transfers will ensure that questions requiring legal or adjudicative determination are directed to Class Counsel or the Claims Administrator without delay.

**e. Wellness and Trauma Safeguards**

- i. Claims Helpers will receive training on trauma-informed practice, vicarious trauma, and cultural safety.

- ii. Regular supervision, debriefs, and wellness check-ins will be provided to staff to mitigate the emotional impact of assisting Claimants who may disclose traumatic experiences.
- iii. In-community sessions will include access to Elders, cultural supports, or mental health professionals where appropriate.
- iv. Crisis response protocols will be in place for situations where a Claimant presents with urgent wellness needs, including referral to the Hope for Wellness Helpline and other emergency supports.

## 12. CAPACITY

- a. Castlemain has demonstrated capacity to design and deliver large-scale, trauma-informed support services in the context of Indigenous settlement agreements across Canada. The company has provided advisory, communications, and implementation services in connection with several national class actions and settlements, including: the Sixties Scoop, Federal Indian Day Schools, Day Scholars, First Nations Child and Family Services and Jordan's Principle, First Nations Drinking Water, and the Federal Indian Hospitals Settlement Notice Plan.
- b. Castlemain has extensive experience working in both urban and remote Indigenous communities, including Canada's northern regions. In addition to southern Canadian Indigenous outreach and engagement, the firm has supported outreach and engagement in northern First Nations, Inuit and Métis communities, where service delivery requires adaptation to geographic distance, limited infrastructure, and unique community protocols. This experience demonstrates Castlemain's ability to operate effectively in diverse environments, including areas where barriers to access are most significant.
- c. Program delivery is supported by a multidisciplinary team with expertise in trauma-informed engagement, cultural safety, Indigenous community relations, training, logistics, and evaluation. Castlemain maintains national reach and established relationships with Indigenous governments, organizations, and

service providers, which will support the effective and culturally appropriate delivery of the Program.

### 13. CONCLUSION

- a. The Claimant Support Program has been developed to fulfill the requirements of section 3.02(2) of the Settlement Agreement. It sets out a framework to provide Claimants and Representatives with access to trauma-informed and culturally safe assistance throughout the Claims Process. The Program includes measures for accessibility and inclusion, aligns with federal policy, and maintains separation between support, adjudication, and legal functions.
- b. Governance, delivery, and evaluation processes are defined to support accountability to the Parties and the Court. The Program is structured to provide clear information, individualized assistance, and appropriate referrals, while respecting privacy, cultural protocols, and the authority of the Claims Administrator and Class Counsel.