

City of Belleville

Report No: AODAC-2024-01

Meeting Date: September 23, 2024



To: Mayor and Members of Council

Department: Corporate Services

Staff Contact: Nicole Yantzi, AODA Coordinator

Subject: Web Accessibility Policy

Recommendation:

“THAT pursuant to the Director of Corporate Services/Clerk’s and Communications Report No.AODAC-2024-01, Council Approve the City of Belleville’s Web Accessibility Policy.

Background:

The Accessibility of Ontarians with Disabilities Act (AODA), 2005 and the Integrated Accessibility Standards Regulation establish the accessibility requirements for municipalities. The Information and Communications Standard applies to both internal and public-facing content and communications such as the City’s internet website(s). The Web Content Accessibility Guidelines (WCAG) is an international standard intended to ensure internet content is more accessible to people with disabilities. Effective January 1, 2020, all internet and intranet websites, and web content must conform with WCAG 2.0 Level AA.

In the City’s 2023 compliance report to the Ministry of Seniors and Accessibility (MSAA) the City stated that the website(s) do not fully comply with the Web Content Accessibility Guidelines (WCAG) 2.0 level AA. This triggered an email from the MSAA requesting that the City of Belleville submit a plan to make the website(s) fully compliant. This plan was submitted and approved on March 18, 2024 (please see plan attached), with October 1, 2024 being the date for 100% compliancy. There are several steps that must happen to reach this goal, and then ongoing monitoring to ensure that the City remains compliant. The Web Accessibility Policy is a key step to reach this goal.

Financial/Analysis:

This policy is vital to meet the AODA standard of being WCAG 2.0 level AA compliant. As the AODA standard is increased this policy will facilitate meeting higher standards. There are steep fines for municipalities that are not compliant. It also sets a web-based html-first

approach for managing content on the website. This will save both staff time, department financial resources, and staff turn-over. Outsourcing the remediation of content is quite costly, especially if they are time sensitive. This approach will save the City thousands of dollars from outsourcing the remediation of content that is not requested to be compliant.

Conclusion:

On March, 18 the City of Belleville’s plan to become compliant was accepted by the Ministry for Seniors and Accessibility. The City has until October 1, 2024 to be 100% compliant. The Web Accessibility Policy and report AODAC-2024-01 have received approval from the Executive Management Team and the Belleville Accessibility Advisory Committee.

To ensure compliance with provincial legislation, municipal policy, and our Multi-Year Accessibility Plan, it is crucial that this policy is presented to and approved by Council.

Attachments:

- [AODAC-01-2024](#)
- [Web Accessibility Policy submitted for council approval](#)

Approved by:

Katy Macpherson, Deputy City Clerk
Jenna Leslie, Communications
Marie Doherty, Director of Corporate Services
Matt MacDonald, Chief Administrative Officer

Status:

Approved - 18 Sep 2024
Approved - 18 Sep 2024
Approved - 18 Sep 2024
Approved - 19 Sep 2024



APPROVAL BLOCK

CAO _____

CITY OF BELLEVILLE

Nicole Yantzi, AODA Coordinator, Corporate Services

Jenna Leslie, Communications Coordinator

Report No. AODAC-2024-01

September 23, 2024

To: Mayor and Members of Council

Subject: Web Accessibility Policy

Recommendation:

“THAT pursuant to the Director of Corporate Services/Clerk’s and Communications Report No.AODAC-2024-01, Council Approve the City of Belleville’s Web Accessibility Policy.

Strategic Plan Alignment:

The City of Belleville’s Strategic Plan identifies an inclusive community as part of the City’s vision. An important component of this is that all citizens can access content on the City’s website(s). This supports the corporate operating principle that all citizens be treated equally in accessing City programs and services.

Background:

The *Accessibility of Ontarians with Disabilities Act (AODA), 2005* and the Integrated Accessibility Standards Regulation establish the accessibility requirements for municipalities. The Information and Communications Standard applies to both internal and public-facing content and communications such as the City’s internet website(s). The Web Content Accessibility Guidelines (WCAG) is an international standard

intended to ensure internet content is more accessible to people with disabilities. Effective January 1, 2020, all internet and intranet websites, and web content must conform with WCAG 2.0 Level AA.

In the City's 2023 compliance report to the Ministry of Seniors and Accessibility (MSAA) the City stated that the website(s) do not fully comply with the Web Content Accessibility Guidelines (WCAG) 2.0 level AA. This triggered an email from the MSAA requesting that the City of Belleville submit a plan to make the website(s) fully compliant. This plan was submitted and approved on March 18, 2024 (please see plan below), with October 1, 2024 being the date for 100% compliancy. There are several steps that must happen to reach this goal, and then ongoing monitoring to ensure that the City remains compliant.

Compliance Plan Submitted to the Ministry of Seniors and Accessibility

- March 18, 2024 and after
 - All new content must meet WCAG 2.0 level AA compliance
 - Email sent by the City Clerk on March 12 to all City staff emphasizing the importance of this deadline
- July to October 2024
 - The Digital Communications Specialist will remove all non-compliant content (pdfs, images with text superimposed on them, maps, etc.) from the City's website(s).
 - These will be identified using the Monsido tool, which the City licenses, and some manual checking. The files will be removed from the website but not deleted. Individuals will be able to click on a link and request a pdf version of the document using their email. If the individual checks that they do not need an accessible version, then an email will be sent immediately to their email address with the pdf or file attached. If an individual clicks that they need an accessible version, then an email will be sent by the AODA Coordinator to the department contact's email via the email address accessibility@belleville.ca with the request and the person's contact information. The department's contact must email the individual and determine the most effective alternative accessible format. If needed the department's contact must send the document for remediation using a company from the vetted list. The department will be responsible for fees incurred.
- August 2024
 - Meeting with the Executive Management Team to discuss the change from a pdf-first approach to web-based html. Discuss and approve Web Accessibility Policy. We will hire Michael Cooper from Cure for Gravity to facilitate.
 - The AODA Coordinator and Digital Communications Specialist will discuss the reasons for the change in direction. In addition to compliance, the EMT will learn how this policy change will decrease their future workload and that of their staff working on the department's webpage.
- September 3, 2024
 - Web Accessibility Policy circulated to and approved by the Accessibility Advisory Committee

- As part of the consultation process the policy will be circulated and a vote taken. Required revisions will be made.
- September 23, 2024
 - Web Accessibility Policy circulated to and approved by Council. Required revisions will be made.
- October 1, 2024
 - Website(s) meet WCAG 2.0 level AA
- Ongoing
 - The Web Accessibility Policy provides details of the responsibilities of departments, the AODA Coordinator and the Digital Communications Specialist for ensuring the City's website(s) remain compliant.
 - Departments will complete and keep records of W3C Easy Checks for Web Accessibility and remedy any non-conforming content. AODA Coordinator and Digital Communications Specialist will complete and keep records of WCAG-EM Report Tool for all City websites and help departments with non-conforming content.

On March, 18 the City of Belleville's plan to become compliant was accepted by the Ministry for Seniors and Accessibility. The City has until October 1, 2024 to be 100% compliant.

The Policy has received approval from the Executive Management Team and the Belleville Accessibility Advisory Committee.

To ensure compliance with provincial legislation, municipal policy, and our Multi-Year Accessibility Plan, it is crucial that this policy is presented to and approved by Council.

Financial/Analysis:

This policy is vital to meet the AODA standard of being WCAG 2.0 level AA compliant. As the AODA standard is increased this policy will facilitate meeting higher standards. There are steep fines for municipalities that are not compliant. It also sets a web-based html-first approach for managing content on the website. This will save both staff time, department financial resources, and staff turn-over. Outsourcing the remediation of content is quite costly, especially if they are time sensitive. This approach will save the City thousands of dollars from outsourcing the remediation of content that is not requested to be compliant.

Conclusion:

Management is recommending that Council approve the Web Accessibility Policy.

Respectfully submitted,

Nicole Yantzi, AODA Coordinator, Corporate Services

Jenna Leslie, Communications Coordinator

AODAC-2024-01 - 4 - September 23, 2024

attachment: Web Accessibility Policy



Subject:

City of Belleville Web Accessibility Policy

Dated: August 28, 2024

Revised:

1. Policy Statement

The Corporation of the City of Belleville, “the City”, is committed to excellence and openness in local government by ensuring accessible, responsive representation. To this end, we will create and deliver public information and communications in accessible formats. Furthermore, when applicable, we will provide notice to the public that alternate formats or communication supports are available upon request.

The City of Belleville’s Web Accessibility Policy requires that all public-facing websites, web applications and web content procured, acquired, owned or controlled directly by the City of Belleville, or through a contractual relationship, conform to the [Web Content Accessibility Guidelines \(WCAG\)](#) to a level that meets or exceeds those stipulated by the *Accessibility for Ontarians with Disabilities Act (AODA)* [Integrated Accessibility Standards Regulation \(IASR\)](#), and specifically Part II Information and Communications Standard.

2. Purpose

This policy outlines the requirements for managing, developing, acquiring or procuring accessible websites, web applications and web content, and the reporting of compliance to Council and the Province of Ontario. Additionally, the policy outlines responsibilities for various groups within the organization that are identified as key in achieving compliance.

Previously as stated in the Information and Communications Standard, the City followed a PDF-first approach to accessibility. At the time (2019) this was effective.

However, changing technology and staff expertise means that the City is moving towards an HTML web-based first approach.

The main reasons for switching from historical PDFs to web-based content are:

- **Accessibility:** Communications is already mandated to create accessible content and thus has (often extensive) experience in producing accessible (AODA compliant) content.
- **Maintenance:** It is almost always easier to update web content than PDF content. There are no concerns about users submitting an old version of a form or getting outdated information from an old document they have previously saved.
- **Ubiquity:** Web content is designed to be deployed on multiple devices including mobile whereas PDF is often cumbersome to interact with on mobile devices.
- **Integration:** While PDF can be integrated into other systems through various methods, it is often much easier to integrate web content (whether shared information or form submissions) into other systems.
- **Saving time:** Documents can be complex and time consuming which can put a strain on departments/staff remediating every document found on the website.
- **Saving money:** This allows the City/departments to focus spending on remediating only what's requested rather than all, where it may never be needed.
- **Gathering metrics:** The request form will allow for the collection of metrics on how often and how many times documents are being requested (data that has been asked for in the past that could not be provided with the existing system).

3. Legislative Authority

The *Accessibility of Ontarians with Disabilities Act (AODA), 2005* and the Integrated Accessibility Standards Regulation establish the accessibility requirements for municipalities. The Web Content Accessibility Guidelines (WCAG) is an international standard intended to ensure internet content is more accessible to people with disabilities. The Information and Communications Standards, part of the Integrated Accessibility Standards Regulation, sets out the WCAG level that the City of Belleville must meet.

4. Definitions

Compliant/Compliance refers to meeting the City's obligation(s) pursuant to AODA.

Conform/Conformance refers to adherence to the WCAG Guidelines and related Success Criteria. All requirements of the relevant standard must be satisfied. Conformance may only be achieved on FULL web pages (or collection thereof). It cannot be achieved or stated if part of any web page is excluded.

Conformance report a report that shows the adherence to WCAG success criteria.

Content as referenced within the Web Content Accessibility Guidelines includes both the natural information within a web page or application such as text, images, videos and sound as well as the code or markup that defines structure, presentation or interaction.

HTML is referred to as Hypertext Markup Language

Public-facing refers to any content exposed and available to the general public or sub-groups of the general public, through a common Uniform Resource Identified (URI). This includes any website or web application that may require a login component as well as any documents (PDFs, images, videos. etc.) that can be accessed via a web browser.

Qualified vendor refers to those that have been formally approved because of an RFP, RFQ, or RFSO process or have been vetted by the AODA Coordinator and Communications and are deemed to provide sufficient services as required under this policy including requirements outlined in the IASR.

Significant refresh refers to an existing asset undergoing a major change. The change could include, but is not limited to, the following elements:

- A significant new look and feel to the website or application
- A significant change in how users navigate the website or application
- A major update and change to the content of the website or application
 - Which may include accumulation of changes equaling 50 per cent or more of a website's content

WCAG-EM refers to the Website Accessibility Conformance Evaluation Methodology, which is a defined methodology providing guidance on how to evaluate websites and applications to determine their conformance to WCAG.

WCAG-EM Report Tool is a template that generates a standardized WCAG conformance report based on utilizing the Website Accessibility Conformance Evaluation Methodology (WCAG-EM).

Website is a collection of related web pages, images, videos or other digital assets that are addressed relative to a common Uniform Resource Locator (URL) and is accessible to the public; including any documents that are part of the site.

Web application refers to something that utilizes user input via an interface, delivered through a web browser. This could be self-contained or be a sub- section of a website.

Web asset is a public-facing website or web application.

Web Content Accessibility Guidelines (WCAG) refers to a single standard developed by the Worldwide Web Consortium (W3C) with the goal of providing guidelines to make web content more accessible to people with disabilities.

Web page content refers to page level content, which may be a single web page, a PDF document, a form, or similar type existing on a City-owned web asset. Web page content (in this policy) is identified as a sub-group of content in relation to a website or web application.

Web product is synonymous with Web asset.

Widget (web) generally refers to a small application that is embedded as an element on a host web page but is independent of the host page. Widgets commonly provide additional access to content from another (independent) website or application.

5. Scope

This policy applies to City employees, volunteers, contractors, individuals and organizations that provide websites, web applications and web content to the public on behalf of the City of Belleville. This policy applies to all acquired, procured and developed public-facing internet websites, web applications and web content controlled directly by the City of Belleville or through a contractual relationship that allows for modification of the web asset.

This policy works in conjunction with the Corporate Accessibility Policy and does not apply to web assets controlled directly by Belleville Police Services, and the Belleville Public Library.

6. Procedure

Departments

As stated in the City of Belleville's Information and Communication Standard departments are responsible for ensuring that content they create, update, maintain and publish on existing, public-facing web assets complies with the IASR by:

- Ensuring that information on page is current.
- Responding in a timely manner to requests for alternate AODA compliant versions of content. Requests will be directed to the appropriate department by the AODA Coordinator
- Once the request is received the department contact is required to initiate a

conversation with the person making the request to determine the most effective alternative version to portray the required information. All logistics are the department's contact responsibility.

- If content needs to be remediated, the department's contact must send the file to one of the companies on the list of approved vendors for remediation. The costs for remediation will come out of the department's budget.
- Making sure that the department receives the original remediated source file, the complaint pdf, and a conformance report for all content sent for remediation.
- Ensuring that new widgets or similar independent features added to web assets are tested by ITS or a qualified 3rd party vendor against applicable WCAG success criteria prior to publication.
- Having at least one person from the department complete training on W3C Easy Checks for Web Accessibility offered by the AODA Coordinator and the Digital Communications Specialist.
- Completing W3C Easy Checks for Web Accessibility a minimum of two times a year on the Department Webpage(s) (January, June) and keep records.
 - Developing procedures and plans to effectively deal with non-conforming web content,
 - Resolving all accessibility issues in a timely manner
- Reviewing and addressing any issues communicated by the AODA coordinator identified in the WCAG-EM conformance reports.

AODA Coordinator is Responsible for:

- Confirming that requests for alternate AODA compliant versions of content are sent to the correct departmental contact and responded to in a timely manner.
- Providing departments with information on qualified vendors for remediating content.
- Assisting departments and communications in obtaining information on web asset inventory and conformance status.
- Providing training to departments on W3C Easy Checks
- Providing guidance to departments regarding legislated and/or policy related obligations
- Working with the Digital Communications Specialist to use the WCAG-EM to complete the WCAG-EM Report Tool for all City websites. This needs to be completed annually by November 1 in order that identified issues can be resolved by the deadline of December 31. This is the deadline for the Accessibility Compliance Report that must be submitted to the Ministry of Seniors and Accessibility every two years.
- Communicating department specific results identified by the WCAG-EM to managers/directors.
- Providing analysis and recommendation on third party assessments when requested and Coordinator is available.

Digital Communications Specialist is Responsible for:

- Ensuring that requests for alternative AODA compliant versions are sent to departmental contacts when AODA coordinator is not available.
- Developing web products that meet accessibility requirements.
- Providing training to departments on W3C Easy Checks.
- Using evaluation tools to conduct quarterly checks.
- Working with the AODA Coordinator to use the WCAG-EM to complete the WCAG-EM Report Tool for all City websites. This needs to be completed annually by November 1 in order that identified issues can be resolved by the deadline of December 31. This is deadline for the Accessibility Compliance Report that must be submitted to the Ministry of Seniors and Accessibility every two years.
- Assisting in the purchase, implementation, and technical maintenance of recommended evaluation tools.
- Providing analysis of testing or widgets or features embedded in existing web assets when requested and Specialist is available.
- Providing departments with metrics concerning the accessibility of their webpages.

Procuring or Developing a New Web Asset

Within this policy, an existing web asset acquired from an external source, or an existing asset undergoing a significant refresh, will be considered as new.

IT will ensure, through the acquisition of services from a qualified vendor that:

- A written acknowledgment of the conformance to the applicable standard(s) is received prior to the acceptance of and publication (go-live) of the asset.
- A WCAG-EM conformance report is provided for websites and web- based applications and received within 30 days of the written acknowledgement of asset conformance.
- In cases where products developed or supplied by third parties are in a non-conformant state, ensure a commitment to a conformance agreement is in place with those parties.
 - The agreement, to be monitored by the controlling department, is a commitment by the third party to address the non-conformant aspects within a pre-determined timeline.
 - The agreement is a condition of acceptance of the non-conforming product.
- Completing the Web Asset Accessibility Status Form, including General Manager or delegated equivalent approval, where the asset is non-compliant
 - Non-compliant approval must be obtained prior to the asset being published live.

7. Accountability Framework

The AODA Coordinator on behalf of the Office of the City Clerk will coordinate reporting on the level of conformance and compliance of internet websites and web applications to:

- Council, annually, as part of the Multi-year Accessibility Plan (MAP)
- To the Province, every two years, as part of the City's attestation as required under the AODA
- Belleville Accessibility Advisory Committee, annually as part of the Multi-year Accessibility Plan (MAP)
- At the request of Council or the Province

Departments will provide the following information, as per the most recent testing, for websites, web applications and content for which they are accountable for, upon request to the AODA Coordinator, on behalf of the Office of the City Clerk:

- AODA compliance status, demonstrated by the W3C Easy Check Tool
- Proof that they have remedied issues addressed by the WCAG-EM Report Tool
- Where products do not conform, the documented plans for conformance with indicated timelines and status of those plans, unless included in the Web Asset Accessibility Status Form

Official Business Records generated because of the execution of this policy must be declared as such in the appropriate SharePoint site, RMS (Records Management System) or approved business system.

8. Policy Review

For more information on this policy contact:

AODA Coordinator, Corporate Services Department

Digital Communications Specialist, Communications Department

Appendices

Web Asset Accessibility Status Form (not yet available)