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 There are no concerns about users submitting an old version of a form or getting outdated information from an old document they have previously saved.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)