CATEGORY:	**INFORMATION MANAGEMENT**
SUBCATEGORY:	**APPROPRIATE USE OF TECHNOLOGY**
SUBJECT:	**DIGITAL ACCESSIBILITY**

A. PURPOSE

The purpose of this policy is to ensure all web content and media assets developed for the external website are accessible for persons with disabilities.

This policy will apply to all web content and applications owned or controlled directly by the Region of Peel or through a contractual relationship that allows for modification of the web product.

Web content may include, but is not limited to, the following:
- Council reports and minutes
- Forms
- Maps
- Data files (Word, Excel, PowerPoint, PDFs)
- Images and photos
- Videos
- Web-based tools and applications
- Graphs and data charts

B. SCOPE

This policy applies to all Region of Peel employees, volunteers, consultants and third-party service providers who develop web content and provide web applications for any Region of Peel owned website on behalf of the Region of Peel.

This policy confirms that the Region of Peel shall conform with the *Accessibility for Ontarians with Disabilities Act, 2005* (AODA), specifically section 14 of the *Integrated Accessibility Standards, Regulation* (IASR) (O. Reg. 191/11) that requires external websites and web content published after January 1, 2012 to comply with the World Wide Web Consortium Web Content Accessibility Guidelines (WCAG) 2.0, Level AA by January 1, 2021.

This policy shall be accordance with the:

- *Accessibility for Ontarians with Disabilities Act, 2005,* S.O. 2005, c. 11 *(AODA)*
- *Ontario Regulation 191/11 Integrated Accessibility Standards (IASR)*
- *Human Rights Code,* R.S.O. 1990, c. H.19

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In addition, this policy shall be in accordance with the following Regional policies and by-laws available on Pathways+:

- Corporate Policy *G00-20 Accessibility*
- Corporate Policy *H00-23 Health Professionals Website Policy*
- Corporate Policy *HR03-32 Accommodation for Persons with Disabilities*
- Region of Peel *Procurement By-law 30-2018*
- Retention By-law *Graphics & Web Design/Production* Retention By-law *Public Relations*

C. Background

The Region of Peel 2018-2025 Multi-Year Accessibility Plan sets out a path to an accessible Peel by reducing and eliminating barriers. The plan has been developed to ensure the barriers faced by persons with disabilities are prioritized and improved. This includes barriers to accessing information. The plan highlights the Region of Peel's commitment to ensure our website and web content is accessible and will meet WCAG 2.0, Level AA standard.

This policy has been implemented to ensure that the Region of Peel commits and adheres to the requirements of the 2018-2025 Multi-Year Accessibility Plan and is in compliance with legislated requirements by maintaining an external website that is mobile-enabled, searchable, findable and usable.

D. DEFINITIONS

Accessible/Alternate Format - a medium and/or methodology that allows access to information in a manner other than how the format was originally delivered. These may include, but are not limited to electronic formats, AODA compliant colour contrasts, and plain text.

Assistive Devices - technical aids, and communication devices modified or customized for use in increasing or improving the functional ability of a person with a disability.

Barriers - obstacles that impede people with disabilities from fully participating in all aspects of society because of their disability. Barriers include attitude, technology, architectural/structural, information and communication, and systemic.

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Communication Supports - tools to facilitate effective communications with persons with disabilities. These may include, but are not limited to, captions, alternative (alt) text for images, plain language and sign language.

Digital Accessibility is the ability of a website, mobile application, or electronic document to be easily navigated and understood by a wide range of users, including those users who have visual, auditory, motor or cognitive disabilities.

Disability - as defined in the *Human Rights Code*: any degree of physical disability, infirmity, malformation or disfigurement that is caused by bodily injury, birth defect or illness and, without limiting the generality of the foregoing, includes diabetes mellitus, epilepsy, a brain injury, any degree of paralysis, amputation, lack of physical coordination, blindness or visual impediment, deafness or hearing impediment, muteness or speech impediment, or physical reliance on a guide dog or other animal or on a wheelchair or other remedial appliance or device;

- a condition of mental impairment or a developmental disability;

- a learning disability, or a dysfunction in one or more of the processes involved in understanding or using symbols or spoken language;

- a mental disorder; or

- an injury or disability for which benefits were claimed or received under the insurance plan established under the *Workplace Safety and Insurance Act, 1997*

Text Alternatives – convey the purpose of an image or function to provide an equivalent user experience. Text alternatives are equivalents for non-content. Examples include:
- short equivalents for images, including icons, buttons, and graphics

- description of data represented on charts, diagrams, and illustrations

- brief descriptions of non-text content such as audio and video files

- labels for form controls, input, and other user interface components

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Third Party Service Provider - an individual, an agency or an organization that is responsible for delivering goods or services on behalf of the Region. These may include, but are not limited to, contractors and vendors.

Web Content Accessibility Guidelines (WCAG) 2.0 – accessibility requirements for web content, including text, images, audio-visual materials, and the code used for structure, style, and interactions.

Website Accessibility Conformance Evaluation Methodology (WCAG-EM) – is an approach for determining how well a website conforms to Web Content Accessibility Guidelines (WCAG). WCAG-EM is a supporting resource for WCAG standard; it does not define additional WCAG requirements.

Web Content – refers to the textual, aural, or visual content published on a website. Content means any creative element, for example, text, applications, images, archived e-mail messages, data, e-services, audio and video files, and so on.

E. POLICY

Website content produced during their design and development stages such as publications, presentations, tools, videos and documents will be created in adherence to accessible guidelines. All efforts must be made to provide an inclusive user experience.

1. All Regional employees and third-party service providers creating communications and creative assets for the external website shall comply to WCAG 2.0 Level AA.

2. Content to be created for the web shall be made accessible within the source document:
    a. Provide alternative text for each photo
        i. On the web, this may not be the case since most images are decorative. The alt attribute will be present but could be kept empty and/or include the *aria-hidden* attribute and set it to *true* as *aria -hidden="true"* within the image tag.
    b. Website page content should be provided in accessible formats
        i. These can be fully accessible PDF or Word document, or plain HTML
    c. Language should be clear and concise

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          i. Language on the website should be at a grade 8 level or lower.
    d. The built-in accessibility checkers should be used to review documentation
    e. Hyperlinked text (link anchor labels) should be unique for each link unless it links to the same page
          i. Hyperlink text should provide enough contextual reference

3. Documentation designed as a PDF file will be remediated and where possible, alternate formats of content will be provided.

    a. This shall also apply to third party service providers who require content on the Region's external website.

4. Documentation and creative assets produced for any Region of Peel owned website will comply to the retention policy designed for www.peelregion.ca. The retention policy can be accessed on the Information Management: Retention By-law page.

5. This policy shall be referenced within any contract of services or statements of work for web content, websites, services, or applications.

6. All Regional employees that write content and design assets for the external website will be provided access to training modules and guidelines.

7. All Region of Peel owned websites will be reviewed every year for accessibility compliance and will adhere to the Website Accessibility Conformance evaluation method.

F. RESPONSIBILITIES

1. The Marketing and Communications Division is responsible for the management of the Region of Peel's external website.

2. Marketing & Communications - Digital Marketing Team will be responsible for uploading and managing all content on the external website and confirming all information is compliant to WCAG 2.0 Level AA.

    a. Digital Marketing Specialist shall provide support to the Marketing and Communications division on AODA policy and compliance.

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3. Marketing & Communications management team is responsible for educating their employees on the policy guidelines.

    a. The Communications Specialist and Coordinators will support their program area by advising and complying to accessibility standards when creating content and assets for the website.

    b. Third party content providers must be knowledgeable on web accessibility and the Region of Peel's web accessibility policy.

4. Marketing & Communications is responsible for reviewing this policy on an annual basis and will update it accordance with the Accessibility for Ontarians with Disabilities Act, 2005.

5. Updates to the policy will be communicated on the Clerks division intranet site.

G. Guidelines

Accessible Guidelines and additional information on accessibility and AODA compliance for the Region of Peel are available on the Office of Culture and Inclusion division intranet site.

APPROVAL SOURCE:	Director, Marketing and Communications
ORIGINAL DATE:	February 10, 2021
LAST REVIEW DATE:	March 5, 2021
LAST UPDATE:	March 29, 2021
EFFECTIVE DATE:	March 29, 2021
RESPONSIBILITY:	Corporate Services/Marketing and Communications