

Category: Accessibility and Inclusion

Title: Digital Accessibility Administrative Directive

Directive Number: ANI - 120

Approved by: CAO/CLT, August 31, 2022

Administered by: Accessibility Office, City Clerk's Office

Effective Date: September 1, 2022

1. Background

The City of Brampton is committed to preventing, reducing, and removing barriers to ensure individuals of all abilities have equal access to all websites, web content and digital communications owned and controlled by the City of Brampton.

The *Integrated Accessibility Standards (191/11, s. 14)* under the *Accessibility for Ontarians with Disabilities Act (2005)* requires all web content, internet and intranet websites owned by the City of Brampton to be accessible and compliant with current World Wide Web Consortium's (W3) Web Content Accessibility Guidelines (In accordance with the schedule outlined in the IASR (Integrated Accessibility Standards Regulation)).

2. Purpose

The purpose of this Digital Accessibility Administrative Directive is to ensure compliance with legislative requirements for developing, procuring and providing accessible websites and web content.

3. Application and Scope

This Administrative Directive applies to:

- a) All City of Brampton employees, volunteers, web content publishers, editors and creators.
- b) All individuals, third-party companies and organizations that provide or maintain any websites or online content including social media on behalf of the City of Brampton.
- c) All web content including but not limited to websites, applications, documents, images, graphs, forms, sounds, videos, and all other web assets associated with the City of Brampton.
- d) All City affiliated websites and content (Library website, Rose Theatre etc.).

3.1 Outcomes

- a. Establish and define the responsibilities of all employees in upholding legislative requirements.
- b. Ensure that the City of Brampton is providing online content that is meeting legislative requirements.
- c. Provide equitable access for individuals of all abilities by conforming to Provincial Legislative requirements and current WCAG standards.

4. Principles

The City of Brampton is committed to providing guiding principles for inclusive customer service, so that individuals of all abilities have equal opportunity to receive services and obtain, use or benefit from public information posted on the City of Brampton's website.

- 4.1 Dignity: All individuals, be it, employees, volunteers, residents or business owners are valued and deserving of full and effective service, where individuals facing barriers are not treated differently or forced to accept lesser opportunities, service, quality or convenience – Provide customer service in a way that allows the person with a disability to maintain self-respect and the respect of other people
- 4.2 Independence: Freedom from control or influence of others
- 4.3 Integration: All employees, residents, and visitors fully benefit from the same opportunities and services, in the same place, and in the same or similar ways as others
- 4.4 Equitable Opportunities: Having the same chances, options, benefits and results for individuals of all abilities. People with disabilities should not have to make significantly more effort to access information or obtain services and should receive the same quality service as others.

5. Mandatory Requirements

This policy confirms that all web content associated with the City of Brampton shall conform to the current WCAG level identified in the IASR to the greatest extent possible.

5.1 Procurement

Operating Departments shall ensure the development of new public facing internet websites, web assets and mobile applications conform to WCAG 2.0 at Level AA by:

- i. Consulting with DI&IT and determining technical solutions and options.
- ii. Ensuring that project and procurement documents and vendor agreements include appropriate accessibility requirements and confirming conditions of current WCAG requirements have been met.
- iii. Document any requirements that do not conform with WCAG 2.0 Level AA and reasons for proceeding with the procurement, including a plan with a timeline for fixing as negotiated with the vendor/developer.
- iv. Complying with all City approved procurement and accessibility procedures including tip sheets.
- v. Making improvements identified by technology tools such as SiteImprove, or made by the Accessibility Team.

6. Roles and Responsibilities

Accessibility Team shall:

- i. Report on the level of conformance and compliance of internet websites and web applications as required for Provincial Compliance Reporting requirements.
- ii. Report on level of conformance and compliance of internet websites and web applications as requested or reported to City Council.
- iii. Provide advice on best practices and the use of recommended tools and resources used to evaluate and produce accessible web assets (web page content, documents, reports, videos, social media content etc).
- iv. Maintain and monitor the database established by DI&IT of the compliance status of web applications and websites and share applicable reports on areas of non-conformance with operating departments
- v. Collaborate with DI&IT on developing communications, training on web accessibility standards, and tip sheets for employees.

DI&IT Shall:

- i. Ensure that all new or significantly refreshed web infrastructure is WCAG 2.0 Level AA compliant.
- ii. Ensure City employees responsible for content updates are trained and provided with applicable web content tools, tip sheets and resources to develop accessible content.

- iii. Allow content publishers to monitor the level of conformance of content using Siteimprove ensuring issues identified are resolved.
- iv. Assist Operating Departments/Content Publishers by providing guidance on the reviewing and interpreting of results from monitoring tools such as Siteimprove.
- v. Provide ongoing research, evaluation, and recommendation of evaluation tools.
- vi. Responsible for assisting in the implementation and technical maintenance of corporate recommended evaluation tools.
- vii. Provide advice and/or assist with hiring a contractor for developing, incorporating, and testing accessibility features in web applications.
- viii. Create a database for the Accessibility Team to monitor the compliance status of web applications and websites and share applicable report on areas of non-conformance with operating departments.
- ix. Maintain website infrastructure that meets accessibility requirements and continue to enhance and evolve the website based on new requirements, technology or trends

Operating Departments & Content Publishers shall:

- i. Ensure all web assets under their control meet the requirements of this policy and the IASR requirements.
- ii. Consult the Accessibility Team and DI&IT to ensure that all projects and procurements include accessibility requirements.
- iii. Ensure all content, websites and web applications are tested for WCAG compliance and that compliance status is documented and available if requested by the Accessibility Team.
- iv. Develop procedures to effectively deal with non-conforming web content.

7. Monitoring and Compliance

Consequences of non-compliance:

Every effort should be made to ensure all internet and intranet websites conform to current WCAG requirements unless it is not practicable to do so, in which an explanation must be provided. A detailed plan should also be provided on how to mitigate non-compliance status and what the pathway to compliance will be.

Alternate formats must be provided if any web content is not accessible. Operating departments will assume any costs associated with providing alternate formats.

Failure to comply with this Administrative Directive shall result in any non-conformance to be documented and submitted to the Corporate Leadership Team for review.

Non-compliance will also be reported to the Provincial AODA Office either upon request or as part of the City's bi-yearly report to the province. Non-compliance may also be shared with the Accessibility Advisory Committee, City Council and other internal staff. Failure to meet website compliance can result in penalties as outlined in section *Accessibility for Ontarians with Disabilities Act (2005, c. 11, s. 37 (3))*. and cause reputational harm to the City.

8. Definitions

“AODA” means Accessibility for Ontarians with Disabilities Act

“DI&IT” means the City of Brampton's Digital Innovation and Information Technology Services

“IASR” means the Integrated Accessibility Standards Regulations

“Internet website” means a collection of related web pages, images, videos, or other digital assets that are addressed relative to a common Uniform Resource Identifier (URI) and is accessible to the public; (“site Web Internet”)

“Intranet website” means an organization's internal website that is used to share any part of the organization's information or operational systems privately and securely within the organization and includes extranet websites; (“site Web intranet”)

“Web Content Accessibility Guidelines” means the World Wide Web Consortium Recommendation, dated December 2008, entitled “Web Content Accessibility Guidelines (WCAG) 2.0”; (“Règles pour l'accessibilité des contenus Web”)

“Web page” means a non-embedded resource obtained from a single Uniform Resource Identifier (URI) using Hypertext Transfer Protocol (HTTP) and any other resources that are used in the rendering or intended to be rendered together with it by a user agent. (“Page Web”) O. Reg. 191/11, s. 14 (7).

“Content Publisher” means an employee, third-party or anyone who has the access and control to make edits or changes to any City of Brampton web infrastructure, including but not limited to City websites, mobile applications, documents etc.

9. References and Resources

This Policy should be read and applied in conjunction with the following references and resources as updated from time to time. Please note that some of the following documents may not be publicly available.

External references

- [How to make websites accessible](#)
- [Integrated Accessibility Standards O. Reg. 191/11, s. 14](#)
- [W3 WCAG Guidelines](#)

References to related bylaws, Council policies, and administrative directives

- [Accessibility Policy](#)

References to related corporate-wide procedures, forms, and resources

- [Information and Communications SOP](#)
- [Communications and Website Overview](#)
- [Accessible Documents Tip Sheet](#)
- [Accessible PDFs Tip Sheet](#)

Revision History

Date	Description
2022/09/01	Approved by CAO/CLT – August 31, 2022 - <i>New</i>
2025/09/01	Next Scheduled Review (<i>typically three years after approval</i>)