

Web Accessibility Policy

Approved by: Director, Executive Committee

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Effective date: January 1, 2014

Revision approved by: General Manager, Finance and Corporate Services

Revision date: [TBD]

Policy statement

The City of Ottawa'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 Ottawa, 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 \(IASR\)](#).

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.

Application

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 Ottawa. This policy applies to all acquired, procured and developed public-facing internet websites, web applications and web content controlled directly by the City of Ottawa 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 Ottawa Police Services, the Ottawa Public Library and Ottawa Public Health.

Policy requirements

Managing existing web assets

Departments shall ensure that content they create, update, maintain and publish on existing, public-facing web assets adheres to the IASR by:

- Utilizing corporate recommended or approved evaluation or site-wide monitoring tools, for both HTML and PDF content, to perform routine, automated testing of this content, and:
 - Performing applicable manual verification as required
 - Resolving all accessibility issues in a timely manner
- 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

ServiceOttawa will provide support to departments by:

- Providing training on:
 - The use of recommended tools used to evaluate and produce accessible web page content on an individual page level, or through a site-wide monitoring service
 - Accessible document creation, including PDF
- Assisting departments to monitor and evaluate web page content by:
 - Assessing and recommending monitoring tools
 - Reviewing and interpreting results from monitoring tools

- Assisting departments in the creation of accessible content, when requested and ServiceOttawa is available
- Assisting departments to develop and execute plans to ensure compliance with applicable web-related legislation and policies
- Providing ongoing research, evaluation and recommendations for evaluation tools
- Assisting departments with third-party document accessibility services, including, but not limited to:
 - Remediation services, analysis and recommendations on work performed, issues resolution and statements of work

Information Technology Services (ITS) will provide support by:

- Assisting in the purchase, implementation and technical maintenance of recommended evaluation tools
- Providing analysis and recommendations on third party assessments, when requested and ITS is available
- Providing analysis and testing of widgets or features embedded in existing web assets when requested and ITS is able

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.

Departments shall ensure the development of new, public-facing web assets conform to relevant standard(s) by:

- Engaging ITS through their intake process

- Following all procurement procedures, including the use of the [City of Ottawa accessible procurement guidelines](#) and applicable standing offers related to accessible products and services
- Ensuring, through the acquisition of services from a qualified vendor or with ITS, 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.
- Ensuring WCAG-EM conformance reports and Web Asset Accessibility Status forms are filed as Official Business Records according to the

Records Management Policy and Procedures and copies are submitted to the Corporate Accessibility Office

ServiceOttawa will provide support by:

- Assisting with the review of WCAG-EM conformance reports, providing evaluation and interpretation of results upon request:
 - On reports received from ITS
 - On reports from departments
- Advising on accessibility criteria or details to include in project and procurement documents

Information Technology Services will provide support by:

- Providing advice and/or assisting with developing, incorporating and testing accessibility features in web applications
- Providing WCAG-EM conformance testing of web products, when requested and ITS is available
- Producing a WCAG-EM conformance report for the department, when requested and ITS is available
- Facilitating the contracting of an external vendor for WCAG-EM conformance testing of products and assisting with interpretation of test results when requested and ITS is available:
 - Facilitating the acquisition of a WCAG-EM conformance report when third-party vendors are contracted, when requested and ITS is available
- Developing web products that meet accessibility requirements
- Providing advice and/or assistance on accessibility requirements and details for project procurement documents

- Advising on timing of accessibility review during development

Reporting on the accessibility of public-facing websites, web applications and web content

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 City of Ottawa Municipal Accessibility Plan (COMAP)
- To the Province, bi-annually, as part of the City's attestation as required under the AODA
- 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 Office of the City Clerk:

- AODA compliance status
- Where available, the Web Asset Accessibility Status forms
- WCAG-EM conformance report for websites and web applications
- 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

Responsibilities

Departments are responsible for:

- Ensuring all web assets under their control meet the requirements of this policy

- Maintaining an annual and accurate inventory of websites, web applications and social media accounts under their control, and providing this information to the Accessibility Office upon request
- Working with ITS, Supply Services and ServiceOttawa to ensure that all projects and procurements include accessibility requirements
- Ensuring that all content, websites and web applications are tested for WCAG conformance and that AODA compliance status is documented and communicated to the Corporate Accessibility Office
- Developing procedures and plans to effectively deal with non-conforming web content

ServiceOttawa is responsible for:

- Providing guidance regarding use of applicable standing offers to procure accessible document creation or remediation services
- Assisting the Corporate Accessibility Office in obtaining information on web asset inventory and conformance status
- Providing guidance to departments regarding applicable regulatory obligations

Information Technology Services is responsible for:

- Providing guidance to departments regarding the use of applicable standing offers or internal services to procure accessible testing or auditing services
- Assisting the Corporate Accessibility Office in obtaining information on web asset inventory and conformance status
- Providing guidance to departments regarding legislated and/or policy related obligations

- Ensuring that internally developed web assets meet accessibility requirements

The Office of the City Clerk is responsible for:

- Coordinating reporting of web accessibility to Council and the Province of Ontario
- Providing advice and interpretation of legislative requirements under the AODA
- Advising managers, Directors, and General Managers of web accessibility obligations during AODA management compliance training

Monitoring/Contraventions

Departments shall maintain the conformance of web assets by:

- Periodically engaging ITS or ServiceOttawa to assist in the review of content to ensure continued compliance to the applicable standard(s)
- Adhering to the corporate Digital Experience Standard

Any non-conformance shall be documented and approved by the General Manager as per the process outlined under the *Procuring or developing a new web asset* section. A retrievable record of approval shall be maintained.

The Finance and Corporate Services Department and the Office of the City Clerk shall monitor the implementation of this policy. In turn, departments will utilize this policy to achieve their legislated obligations under the AODA.

Offences under the AODA are subject to disciplinary actions by the Province.

References

[Accessibility Policy](#)

[Digital Experience Standard \(VPN required\)](#)

[Communications Policy](#)

Legislative and administrative authorities

[Ontario Regulation 191/11 Integrated Accessibility Standards \(IASR\) under the Accessibility for Ontarians with Disabilities Act, 2005, S.O. 2005, c. 11](#)

[Web Content Accessibility Guidelines](#)

[PDF/UA](#)

[Human Rights Code \(Ontario\)](#)

[Accessible Canada Act](#)

Recordkeeping requirements

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

Definitions

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

Conform/Conformance refers to adherence to the WCAG or PDF/UA 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.

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

Not practicable means the commercial software, tools, or both, to make the website, application or content fully conformant with all applicable WCAG criteria, is not readily available or the information is lost in the conversion process and cannot be conveyed in a meaningful way.

PDF/UA is the international (ISO) technical standard that provides definitive terms and requirements for accessibility in PDF documents and related applications.

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 Identifier (URI). This includes any website or web application that may require a login component.

Qualified vendor refers to those that have been formally approved as a result of an RFP or RFSO process or have been vetted by either the ITS QA group and/or ServiceOttawa Digital Services Branch and are deemed to provide sufficient services as required under this policy.

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 Identifier (URI) and is accessible to the public; ("site Web Internet")

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.

Enquiries

For more information on this policy contact:

Program Manager, Digital Services Branch
Finance and Corporate Services Department

Appendices

Web Asset Accessibility Status Form (not yet available)