

# Accessible formats and communication supports procedure

Approved By: City Council

Category: General Administration

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## Application

This procedure applies to City employees, volunteers and other persons or organizations that provide goods, services or facilities to the public or other third parties on behalf of the City, in accordance with the Integrated Accessibility Regulation developed under the *Accessibility for Ontarians with Disabilities Act* (AODA), 2005, and in support of the City of Ottawa Accessibility Policy.

This procedure applies to all materials and communications products produced or purchased (e.g. consultant reports) by the City of Ottawa for release to the public. It does not apply to products and product labels, unconvertible information, or information that the City does not control directly or indirectly through a contractual relationship.

Each publication should be produced in such a way as to reduce barriers in the original document. Adaptation to another format can be accommodated easily and quickly when accessibility is considered during the development.

## Procedure Description

### Notification

The City will advise the public of the availability of accessible formats and communication supports.

The City will include:

- A link on all City websites to the [Accessible Formats and Communication Supports Request Form](#) (Appendix A);
- Signage at every public service counter advising of the availability of accessible formats and communication supports;

- The line “Accessible formats and communication supports are available, upon request” is to be placed at the bottom of the front page of:
  - all Council and Committee agenda indexes and agendas;
  - large-scale documents for citywide public consultation (such as the Budget Overview or the Official Plan);
  - all documentation available for citywide public consultation; and,
  - anywhere else the City determines that notification is reasonable.

## **Processing Requests**

Requests for an accessible format or communication support can be received by staff in person, by phone/TTY, by Video Relay Service or by electronic formats such as emails or service requests. Upon receipt of a request, staff will complete the online request form (Appendix A), which is forwarded to the Accessibility Office for record-keeping purposes only. The request is to be responded to by the appropriate operational staff. This form is available on [ottawa.ca](http://ottawa.ca).

All City staff shall, upon request, and in consultation with the person making the request, provide or make arrangements to provide accessible formats and communication supports for persons with disabilities. Accessible formats and communication supports shall be provided:

- in a timely manner;
- taking into account the person’s accessibility needs; and,
- at a cost that is no more than the regular cost charged to other persons.

Once the appropriate format or support is determined with the requestor, staff shall provide or arrange for the provision of the accessible formats and/or communication supports for persons with disabilities.

- If a staff member determines that information is unconvertible, they shall, in consultation with their manager, provide the person requesting the information or communication with:
  - (a) a written explanation as to why the information or communications are unconvertible; and,
  - (b) a summary, including all relevant and essential parts, of the unconvertible information or communication.

The Accessibility Office is available for consultation to help determine if information can be converted or discuss how to provide a communication support.

Further to this requirement:

- All verbal (Live and pre-recorded) emergency related communications shall proactively include American Sign Language (ASL), simultaneous French translation, Langue des signes québécoise (LSQ) and captioning.
- All written electronic and web content related to the emergency communication products shall be created in an accessible format. This includes but is not limited to documents, procedures, forms, plans or public safety information that are to be made available to the public.
- The City, as a designated public sector organization, as legislated under the [AODA's IASR 14 \(2\)](#) shall:
  - As of January 1, 2021, make any public facing website or web content conform with the World Wide Web Consortium Content Accessibility Guidelines (WCAG) 2.0 Level AA.
- When planning in-person events, consider the inclusion of virtual participation through a virtual meeting platform. This hybrid event model allows more participants to attend and provides an accessible, convenient, cost effective and safe option for all participants, including people with temporary or permanent disabilities. This includes, but is not limited to, public and internal meetings, consultations, celebrations, festivals, and community events. Consideration should also be given to including ASL, captioning, simultaneous French translation and LSQ.

## Timeframe

The timeframe for the conversion process of a document into an accessible format, or the provision of a communication support, can vary depending on the media chosen, the size, complexity, quality of source documents and the number of documents to be converted. The information requested shall be provided in a timely manner depending on the factors previously noted.

If the document being requested is the subject of a public consultation or has a set timeframe for public comment, the timeframe for document conversion and distribution must be taken into consideration.

## Cost of Conversion

Creating information and communications in accessible formats on websites can help reduce the cost of conversion.

When a request is made for a City document in an accessible format or information with a communication support, the department of origin is responsible for the cost of conversion, materials and distribution of information.

## Monitoring/Contraventions

Supervisors and managers shall monitor current practices to ensure compliance.

Failure to comply with the AODA regulations can result in Provincial administrative penalties, and failure to comply with this procedure may result in disciplinary action, up to and including dismissal.

## References

[City of Ottawa Accessibility Policy](#)

Accessible Web Publishing Procedures

City of Ottawa Communications Policy

[Equity and Diversity Policy](#)

## Legislative and Administrative Authorities

[\*Accessibility for Ontarians with Disabilities Act, 2005, S.O. 2005, c. 11\*](#)

[\*Integrated Accessibility Standards, O. Reg. 191/11\*](#)

[\*Human Rights Code, R.S.O. 1990, c. H.19\*](#)

## Responsibilities

### **Accessibility Office is responsible for:**

- Collecting information about requests from departments; and,
- Monitoring compliance with this procedure on an annual basis.

### **Directors are responsible for:**

- Creating and maintaining service free from discrimination toward persons with disabilities;
- Budgeting for the costs associated with accessible formats and communication supports of materials originating from their departments; and,
- Monitoring situations where requests for accessible formats and communication supports have not been provided and determining ways to make the information more convertible in the future.

## **Managers and Supervisors are responsible for:**

- Creating and maintaining service free from discrimination toward persons with disabilities;
- Ensuring employees are aware of this procedure and are logging requests that are received by their departments through the online form;
- Tracking costs associated with requests;
- Ensuring employees are providing residents with the requested accessible format and communication support;
- Ensuring that staff provide residents with an explanation as to why information or communications are unconvertible; and,
- Overseeing the provision of a summary of the unconvertible information or communication support to the resident.

## **Definitions**

**Accessible Formats** – these may include, but are not limited to, large print, recorded audio and electronic formats, Braille and other formats usable by persons with disabilities.

**Common Accessible Formats** – some of the most common accessible formats are (but are not limited to):

- HTML or electronic text version online that meet the WCAG 2.0 level A or AA;
- Text saved as an accessible Word document;
- Large text;
- Plain language versions; and,

- Braille.

**Common Communication Supports** – some of the most common communication supports are (but are not limited to):

- Screen reader software;
- Verbal plain language explanation of a written document;
- Video captioning, transcripts;
- Alternative and augmentative communication supports such as an FM Loop system or Communication Access Realtime Translation (CART); and,
- Sign language interpretation (ASL in English or LSQ in French).

See Guidelines for Communicating with People who have Disabilities (Appendix B) for more information.

**Communications** – the interaction between two or more persons or entities, or any combination of them, where information is provided, sent or received.

**Communication Supports** – these may include, but are not limited to: captioning, alternative and augmentative communication supports, plain language, sign language and other supports that facilitate effective communications.

**Conversion Ready** – an electronic or digital format that facilitates conversion into an accessible format.

**Electronic Text** – an electronic text means of presentation of information that enables various computer programs to convert the information into a "readable" format; electronic text where all illustrations or graphical information is explained fully in text.

**Information** – includes data, facts and knowledge that exist in any format, including text, audio, digital or images, and that convey meaning. The AODA information and communication standard does not apply to the following:

1. Products and product labels.
2. Unconvertible information or communications.
3. Information that the City does not control directly or indirectly through a contractual relationship.

**Unconvertible** – it is not technically possible to convert the information or communications, or the technology to convert the information or communications is not available.

# Keyword Search

Accessible Formats

Communication Supports

Accessibility

## Enquiries

For further information regarding this procedure, contact:

Corporate Accessibility Office

Office of the City Clerk

[accessibilityoffice@ottawa.ca](mailto:accessibilityoffice@ottawa.ca)

## Appendices

### Appendix A

[Accessible Formats and Communication Supports Request Form](#)

### Appendix B

#### **Guidelines for Communicating with People who have Disabilities**

The following information is provided by the Ministry of Community and Social Services (Province of Ontario).

#### Deaf, oral deaf, deafened, and hard of hearing

People who experience hearing loss may be deaf, oral deaf, deafened, or hard of hearing. People experiencing hearing loss may use assistive devices like hearing aids, special telephones, sign language interpreters, various amplifiers or a pen and paper. They may also read lips or prefer to communicate through email, texting or a TTY (available through 3-1-1 operators).

TTY stands for Teletypewriter, a type of telephone that allows callers to send typed messages to each other across phone lines.

TTY users can directly call other TTY numbers or they can connect with a Relay Service. A standard phone user can also place a call to a TTY user through the Relay operator. You give the operator your name, the name of the person you are calling, and

the number you wish to reach. Using the Relay Service locally is free. For long-distance, any standard long-distance charges would apply.

Here are suggested ways to best communicate with a person who has hearing loss:

- Attract the customer's attention before speaking. For example, try a gentle touch on the shoulder or wave of your hand.
- Don't shout.
- Make sure you are in a well-lit area where your customer can see your face.
- If the person uses a hearing aid, reduce background noise or move to a quieter area.

## Vision loss

Few people who are blind have no vision at all. According to the Canadian National Institute for the Blind (CNIB), nine out of 10 people who use their services have some degree of vision.

Three million Canadians have difficulty reading conventional text.

Vision loss can restrict someone's ability to read signs, locate landmarks or see hazards. Some customers may use a guide dog or white cane; others may not. Some customers simply need to view written materials like documents, receipts, menus, brochures, instructions or labels in large print, or with the help of a magnifier. Many also use readers that read information to them from an accessible document or an accessible website.

- Do not assume the individual can't see you.
- Identify yourself when you approach your customer and speak directly to him or her.
- Offer your elbow to guide the person. If they accept, walk slowly, but wait for permission before doing so.
- Identify landmarks or other details to orient your customer to the environment around them.
- If you are given directions or providing any information, be precise and descriptive. For example, if you're approaching a door, stairs or an obstacle, say so.



- Do not leave your customer in the middle of a room. Guide them to a chair or a comfortable location. Do not walk away without saying goodbye, and let them know what to expect next.
- Offer to communicate pertinent information through email or links to websites where they can find more information.

## Deafblind

A person who is deafblind cannot see or hear to some degree. Many people who are deafblind will be accompanied by an intervenor, a professional who helps with communicating.

Intervenors are trained in special sign language that involves touching the hands of the client in a two-hand, manual alphabet or finger spelling.

Keep these suggestions in mind when you serve a customer who is deafblind:

- Speak directly to your customer, not to the intervenor.
- Identify yourself to the intervenor when you approach your customer who is deafblind.
- A customer who is deafblind is likely to explain to you how to communicate with them or give you an assistance card or a note explaining how to communicate with them.

## Learning Disabilities

A learning disability refers to a variety of disorders that affect how a person acquires, retains or takes in information. People with learning disabilities just learn differently. Learning disabilities affect people from all backgrounds and are not caused by culture, language or a lack of motivation.

Learning disabilities are specific impairments that can result in problems with reading and language-based learning (dyslexia), problems with mathematics (dyscalculia), or problems with writing and fine motor skills (dysgraphia).

This disability may become apparent in your customer service interaction when the person has difficulty reading material or taking in and processing the information you are providing.

Some tips:

- Ask customers how you can best help them.

- Take some time. People with some learning disabilities may take a little longer to process, understand and respond.
- Provide information in a way that works for your customer. For example, keep a pen and paper handy. That way, you can explain, and then review and repeat the information using your notes.
- If you are discussing confidential information, consider giving the notes to your customer or offering to destroy them.
- Be prepared to explain any materials you provide for your customers.

## Intellectual/Developmental Disabilities

Developmental or intellectual disabilities can mildly or profoundly limit a person's ability to learn, communicate, do everyday physical activities and live independently.

You may not know that someone has this disability unless you are told, or you notice the way the person acts, asks questions or uses body language. However, they may understand you more than you realize.

An example of a developmental disability would be Down syndrome.

Here is some guidance:

- Don't assume what a person can or cannot do.
- Use plain language.
- Make sure your customer understands what you've said. You can be direct and ask: "Do you understand this?"
- Provide one piece of information at a time. You can break down the information into simpler concepts, without exaggerating speech or gestures or being patronizing.
- You may want to ask if the information needs to be repeated.

## Mental Health Disabilities

One in five people in Ontario will experience a mental health issue at some point in their lives.

The important thing to remember when communicating with a person who has a mental health disability is to focus on completing the transaction in a calm, patient way and meeting the customer's needs. Mental health issues can affect a person's ability to think

clearly, concentrate or remember. Mental health disability is a broad classification for many disorders that can range in severity. Customers may experience anxiety due to phobias or panic disorders. Hallucinations, mood swings, and a deep lack of motivation may be signs of a mental health disability. A person may have a clinical depression or bipolar disorder.

The major barrier for a person with a mental health disability is the stigma associated with it and the lack of understanding.

Here are some suggestions:

- Be confident and reassuring. As with all customers, listen carefully and focus on meeting the customer's needs.
- If the person appears to be in a crisis, ask them to tell you the best way to help.
- If a customer appears to show signs of a mental health disability, it may be helpful to keep in mind that the customer's reactions are not connected to you personally, as a service provider. The customer may simply be showing symptoms of mental illness.

## Speech or Language Disabilities

Some customers may have problems communicating because of their disability. Cerebral palsy, stuttering, hearing loss or other conditions may make it difficult for the person to pronounce words or may cause slurring or stuttering. A person with this type of disability may use a communication board or other assistive devices.

A few pointers:

- Do not assume that just because a person has this disability they also have another.
- Give your customer whatever time they need to get their point across. If appropriate, offer to move to a more comfortable location.
- Ask questions that can be answered "yes" or "no," if possible.
- Do not interrupt or finish your customer's sentences. Give them time to finish.

## Physical Disabilities

Physical disabilities can result from many different situations, for example: Cerebral palsy, Multiple sclerosis, arthritis, heart or lung conditions, or amputations.

Here are some tips:

- A person with a physical disability may not need assistance to verbally communicate, but may need other types of assistance to be served.
- Ask before you help. People with physical disabilities often have their own ways of doing things.
- They may ask you to assist with reaching items for them or securing paperwork in a bag for them.
- Inform your customer of the accessible features in the immediate environment (automatic doors, lowered counters, accessible washrooms, elevators, ramps, etc.).
- Respect your customer's personal space. Don't lean over them or on an assistive device.
- Do not move items or equipment, such as canes or walkers, out of the person's reach.
- If you have permission to move a person in a wheelchair, remember to make sure your customer is ready to be moved and that you describe what you are going to do beforehand. Don't leave the individual in an awkward, dangerous or undignified position such as facing a wall or in the path of opening doors.

## **Ways to make information accessible**

### **Use Plain Language**

Keep your text as clear and as easy to read as possible. This is not only beneficial for clients with learning disabilities and low literacy skills, but it also improves comprehension for all clients and will make adaptation to other formats easier. All technical terms and acronyms should be fully explained.

### **Provide Assistive Technologies and Communication Supports**

"Assistive technology" is an umbrella term that includes assistive, adaptive, and rehabilitative devices for people with disabilities. Assistive technologies promote greater independence by helping people to perform tasks that they were formerly unable to accomplish, or had great difficulty accomplishing. Some assistive technologies and communication supports include:

**Accessible Documents:** an accessible document is usable by all people, regardless of their ability. Characteristics of accessible documents include:

- Larger (12 point), sans serif font and maintains high contrast;
- Uses built-in styles and templates;
- Emphasizes text in bold and is not dependent on italics, underlining and colour to differentiate text;
- Uses alternate text when images are used; and,
- Is easily convertible to another format, such as Braille or an e-reader.

To learn how to create accessible documents that can be read with a web reader, see the resources, including an online module, on the Accessibility Resources page on Ozone. In-class training is offered through the Corporate Computer Training Centre.

**American Sign Language (ASL) and French Sign Language (LSQ):** ASL and LSQ uses hand shapes, hand positions, facial expressions and body movements to convey meaning to people who are deaf, deafened, or hard of hearing.

**Assistive Listening Devices (FM Loop System):** a system where the audio source is broadcast wirelessly over an FM frequency. The person who is listening may use a small FM receiver tuned into the signal and listen at their preferred volume. FM Loop systems are available at City Hall public meeting rooms and at some Ottawa Public Library locations.

**Braille:** a tactile system of raised dots representing letters. It is used by people who are blind or deafblind and is produced using Braille transcription software. In order to make a request for a document in Braille you will need to ask the requestor if they require a document in Grade 1 or Grade 2 Braille and you will need to provide the document in a plain text format.

**Captioning:** the provision of words, in a written format, that accompanies spoken words in a video. It usually appears at the bottom of the screen. Many video production companies provide video captioning as an additional service. It is important to include this criterion when ordering the development of videos.

**Communication Access Realtime Translation (CART):** this service can be used at public events to display spoken words on large screens to help participants with hearing loss to follow speeches. Services can be provided on location or remotely.

**Large Print:** the minimum suggested font size is point size 12; however, someone with low vision may request up to 48 point font in order to read the information.

**Transcription:** the conversion of speech into a written or electronic text document.

**Verbal or Written Description:** a verbal or written plain language explanation of a document or picture.

**Screen Reader Software:** screen readers use a speech-synthesizer to read text from computer screen or convert it to Braille. For readers to work, the information must be formatted properly (in a structured electronic file) so that the screen reader can recognize it.

**Digital Accessible Information Systems (DAISY):** an audio format for people who have trouble with print – including limited vision and learning disabilities like dyslexia. DAISY digital talking books are like audiobooks, but include navigation features to help readers skip forward or backward through the material.

**Structured Electronic Files:** these include information about how elements of the document are formatted, like titles, section headings, etc. These files can be created using "styles" in most standard word processing programs. Documents created as structured electronic files are easier to convert to accessible formats (such as Braille and DAISY) and will allow screen readers to navigate the information effectively.

**Tactile Signage:** tactile means "understood through sense of touch." Characters and pictograms are raised 0.8 to 1.5 mm above the surface and have Grade 1 Braille located directly below the associated pictograph or large text.

Resources on where to obtain the following information and communication supports are available through the Accessibility Office:

- Braille
- Communication Access Realtime Translation (CART)
- Sign Language Interpretation/Intervenors
- Video Captioning Services/Transcripts

For additional information please contact the Corporate Accessibility Office at 613-580-2424 ext. 21629 or e-mail: [accessibilityoffice@ottawa.ca](mailto:accessibilityoffice@ottawa.ca)