

# **Accessible Communications Policy**

Policy Number:	CM-POL-2023-001
Applies to:	All Employees
Approval Date:	2023-07-10
Revision Date(s):	N/A
Approval Authority:	Chief Administrative Officer

# 1. Policy Statement

The Town of Collingwood (the "Town") is committed to ensuring that communications published both internally and externally meet the needs of users including those with a visual, learning, or cognitive disability who may use assistive technology to access document content.

## 2. Purpose

To establish clear expectations for staff to ensure all materials and communications produced by or for the Town of Collingwood whether created in-house or on behalf of the Town (i.e. consultant reports) are accessible.

The purpose of this policy is to ensure the Town meets its legislated obligation to provide or arrange for the provision of accessible formats and communication supports for persons with disabilities and to make website and web content accessible in accordance with the <u>Integrated Accessibility Standards Regulation</u> (O. Reg. 191/11).

The policy further supports the Town's commitment to provide persons of all abilities consistent opportunity and access to Town goods, services, and facilities while ensuring that policies, procedures, and practices are provided in a timely manner and address integration, independence, dignity and equal opportunity.

# 3. Scope

This policy applies to all information or communication that the Town can directly control, meaning information the Town creates, owns or where a contractual relationship with a third-party provider allows for modifications.

This policy does not apply to:

- Products or product labels, unless otherwise stated;
- Unconvertible information and communications (e.g. blueprints); and
- Information and communications that the Town does not control directly or indirectly through a contractual relationship.

# 4. Principles of the Policy

The Town is committed to:

- Striving to meet the accessibility needs of persons with disabilities in a timely manner, and as a minimum will have Town websites and web content conform with the World Wide Web Consortium Web Content Accessibility Guidelines (WCAG) 2.0, at Level AA, other than live captions and pre-recorded audio descriptions.
- Providing accessible templates, tools, and document training to staff.

# 5. Definitions

- Web Content Accessibility Guidelines means the World Wide Web Consortium Recommendation, dated December 2008, entitled "Web Content Accessibility Guidelines (WCAG) 2.0".
- Web Content refers to the textual, aural, or visual content published on a website directly on the page or as an attachment.
- Accessible Documents the level of compliance to the World Wide Web Consortium's (W3C) Web Content Accessibility Guidelines (WCAG) 2.0 Level AA and is produced as accessible Word, Excel, PowerPoint, PDF, etc; that passes Adobe Pro accessibility checker.
- Accessible Formats may include, but are not limited to, large print, recorded audio and electronic formats, braille, and other formats usable by persons with disabilities.
- **Communication Supports** may include, but are not limited to, captioning, alternative and augmentative communication supports, plain language, sign language and other supports that facilitate effective communications.
- **Communications** means the interaction between two or more persons or entities, or any combination of them, where information is provided, sent, or received.

# 6. Roles and Responsibilities

Managers/Supervisors:

- Ensuring that their staff are familiar with and comply with this Policy.
- Ensuring that third-party contractors adhere to this Policy in the production of information and communications produced on behalf of the Town.

#### **Employees/Document Authors:**

• Ensuring that all information and communications follow the Corporate Style Guide developed in alignment with WCAG 2.0 Level AA.

#### **Department Head:**

- Identifying an Accessible Communications Champion(s) who will be the lead for their department, and ensuring they have the time and resources to carry out their roles.
- Responsible for reporting non-compliance to the Executive Director, Customer and Corporate Services.

#### Accessible Communications Champions:

Persons identified by their respective Department Head, who is responsible within their service area for ensuring all documents originating from their service area are accessible and:

- Completing accessible document and website training.
- Providing employee support within their service area to assist document authors with accessibility compliance and best practices, prior to uploading to the website or publishing in another format.
- Running a final accessibility check through the Town's specified accessibility tools on documents and webpage content and making accessibility corrections where necessary, prior to publishing or submitting for publishing.
- Bringing non-compliance with this policy to the attention of their Department Head and the Accessibility Leadership Group.

**Website Editors:** Staff with the ability to edit Town of Collingwood websites must ensure that any web content/documents uploaded to the website comply with this policy, such as by ensuring documents have been reviewed by the Accessible Communications Champions.

**Accessibility Leadership Group:** Executive Director, Customer & Corporate Services, Executive Assistant, Customer & Corporate Services, Manager, Public Relations & Communications and Coordinator, Communications.

- Executive Director, Customer & Corporate Service is the primary lead for accessibility compliance.
- Manager, Communications is responsible for overall branding and inclusive design and creation of accessible templates, and website compliance.
- The Accessibility Leadership Group is responsible for facilitating accessible communications training including creating accessible documents and website accessibility.

#### Human Resources:

• Human Resources is responsible for uploading, administering and tracking accessible document/communications training through HR Downloads as provided by the Accessibility Leadership Group.

# 7. Policy

- 7.1. All Town of Collingwood materials and communications produced by or for the Town will be in compliance with the World Wide Web Consortium's (W3C) Web Content Accessibility Guidelines (WCAG) 2.0 Level AA in accordance with the <u>Integrated Accessibility Standards Regulation</u> (O. Reg. 191/11).
- 7.2. To ensure compliance, staff must:
  - 7.2.1. Produce documents in compliance with the Town's Style Guide
  - 7.2.2. Use Corporate templates where applicable.
  - 7.2.3. Ensure all web content posted since Jan. 1, 2012, be in compliance All web content published on a Town website prior to January 1, 2012, will be considered archived and be made accessible upon request.
  - 7.2.4. Notify the public about the availability of accessible formats and communication supports.
  - 7.2.5. Upon request staff will provide or arrange for accessible formats and communication supports for persons with disabilities in a timely manner, including consulting with the requestor to take into account the person's accessibility needs, and at a cost that is no more than the regular cost charged to other persons.
- 7.3. The CAO may approve deviations from this policy.

#### 8. Policy Review

This policy shall be reviewed annually by the Executive Director, Customer & Corporate Services

### 9. References and Resources

Accessible Communications Procedure CM-SOP-2023-001 <u>WCAG 2</u> <u>Accessible Digital Office Document (ADOD) Project</u> Town of Collingwood Corporate Style Guide