

# Web Accessibility Policy

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## Policy Statement

The City of Ottawa's Accessibility Policy requires that internet websites and web content owned or controlled directly by the City of Ottawa, or through a contractual relationship, conform to the [World Wide Web Consortium's](#) (W3C) [Web Content Accessibility Guidelines](#) (WCAG) 2.0 at Level A and AA, in accordance with the schedule and exceptions set out in the Accessibility for Ontarians with Disabilities Act (AODA), [Integrated Accessibility Standards](#). This policy confirms that the City's web assets shall conform to WCAG 2.0 Level AA unless not practicable to do so, and where not practicable to do so, that it meets as many success criteria as is practicable.

## Purpose

This policy outlines the requirements for developing or procuring accessible websites, web applications and web content for the reporting to Council and the Province of Ontario in compliance with legislated requirements.

## Application

This Policy applies to City employees, volunteers, contractors, individuals or organizations that provide internet websites, web applications and web content to the public on behalf of the City of Ottawa. This policy applies to all 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 product.

# Policy Requirements

## Publishing Web Content

*Service Areas* shall maintain the conformance of web page content by:

- Monitoring the level of conformance of content through the use of automated tools and manual spot checks and ensuring issues identified are resolved
- Ensuring that new, or significantly refreshed web page content, is WCAG 2.0 Level AA prior to publishing by:
  - Using corporate recommended tools to perform an automated evaluation of content, in addition to performing required, manual verification as required and/or
  - Having a third party assess the content and provide a statement of conformance of either:
    - Website Accessibility Conformance Evaluation Methodology (WCAG-EM) report for HTML based content
    - CommonLook or equivalent report for PDF content. PDF content may be either WCAG 2.0 AA or PDF U/A (Universal Accessibility) conformant
- Ensuring City employees responsible for content updates are trained to develop accessible content.

*Service Ottawa* is responsible for providing support to *Service Areas* by:

- Providing training
  - On the use of recommended tools used to evaluate and produce accessible web page content
  - On accessible document creation, including PDF
- Assisting *Service Areas* to monitor and evaluate web page content
  - By assessing and recommending monitoring tools (e.g. Siteimprove)
  - By reviewing and interpreting results from monitoring tools
- Providing analysis and recommendations on third party assessments (when requested)
- Assisting *Service Areas* to develop and execute plans to ensure compliance with web-related legislation and policies
- Providing ongoing research, evaluation and recommendation of evaluation tools

*Information Technology Services (ITS)* is responsible for assisting in the implementation and technical maintenance of corporate recommended evaluation tools (e.g. Siteimprove, CommonLook).

## Procuring or developing new or significantly refreshed websites or web applications

*Service Areas* shall ensure the development of new public facing internet websites and web applications conform to WCAG 2.0 at Level AA by:

- Engaging ITS through the Intake Process for ITS Projects. ITS shall explore technical solutions and options and assist Service Areas in determining if a solution will be developed internally or procured.
- Following all procurement procedures including the use of the [Six-step Accessible Purchasing Guidelines](#) and applicable standing offers related to accessible products and services.
- Engaging with Supply Services and ITS to ensure that project and procurement documents and vendor agreements include the following requirements:
  - A WCAG-EM report as outlined in the City's Web Accessibility and Conformance Reporting Manual
  - That the WCAG-EM report be received by the Service Area prior to acceptance and publication of the product
- Completing the [Accessibility status applications/web products form](#) indicating one of the following;
  - Conforms -- the results documented in the report show that all conditions of WCAG 2.0 Level AA have been met.
  - Does Not Conform (Not practicable) -- the results documented in the report indicate that one or more criteria for either Level A or AA have not been met
  - Does Not Conform -- The results documented indicate that the conditions for one or more criteria have not been met, or the product is only at Level A. The reason for proceeding and the plan with a timeline for fixing, as negotiated with the vendor/developer must be included. If the product is temporary, but meets all Level A criteria, and will be removed prior to 2021, indicate this as the reason for non-conformance in the comments area of the WCAG-EM report.
- In cases where products developed or supplied by third parties are in a non-conformant state, ensure a commitment to 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.
- Communicating with the accountable General Manager utilizing the [Accessibility status applications/web products form](#) and obtaining their approval in writing prior to publication, for any website or application that does not comply with AODA legislation.
- Ensuring WCAG-EM reports and General Manager approvals are filed in BIMS in G00-17 - AODA Compliance Documentation.

## **Reporting on the accessibility of public facing websites, web applications and web content:**

The *Office of the City Clerk and Solicitor* 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.

*Service Areas* will provide the following information, as per the most recent testing, for websites, web application and content for which they are accountable to upon request to the Office of the City Clerk and Solicitor:

- AODA compliance status
- The level of WCAG conformance (i.e. A, AA, etc.)
- WCAG-EM (for websites and applications)
- Where products do not conform, the documented plans for conformance with indicated timelines and current status of those plans.

## **Responsibilities**

*Service Areas* are responsible for

- Ensuring all web assets under their control meet the requirements of this policy
- Working with ITS, Supply, and Service Ottawa to ensure that all projects and procurements include accessibility requirements
- Ensuring all content, websites and web applications are tested for WCAG compliance and that compliance status is documented and communicated to ITS
- Providing documentation to the City Clerk and Solicitor as required for reporting on compliance
- Developing procedures to effectively deal with non-conforming web content

*Information Technology Services* is responsible for

- Providing advice and/or assisting with hiring a contractor for developing, incorporating and testing accessibility features in web applications
- Facilitating the contracting of a vendor for WCAG-EM compliance testing of products and assisting with interpretation of test results for projects that involve an ITS project manager/contact through the intake process
- Maintaining a database of the compliance status of web applications and websites
- Developing web products that meet accessibility requirements

*Service Ottawa* is responsible for

- Providing guidance regarding use of applicable Standing Offers to procure accessible web documents such as PDF/Word
- Advising on accessibility criteria or details to include in project and procurement documents
- Advising on use of the Web Accessibility Testing and Conformance Reporting Manual and WCAG-EM report requirements
- Advising on timing of accessibility review during development
- Assisting ITS with the review of WCAG-EM reports, evaluation and interpretation of results
- Where ITS is not involved in the development or procurement, assisting Service Areas with the review of WCAG-EM reports, evaluation and interpretation of results

The *Office of City Clerk and Solicitor* is responsible for

- Coordinating reporting of web accessibility to Council and the Province of Ontario
- Providing advice and interpretation of legislative requirements under AODA.

## **Monitoring/Contraventions**

*Service Areas* shall maintain the conformance of web applications and websites by re-testing and completing an Accessibility status applications/web products form for any website or web application that has undergone a significant refresh.

Significant refresh 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 and/or
- a major update and change to the content of the website or application.
  - may include accumulation of changes equaling 50 per cent or more of a website's content

Content may include any information found on a web page or web application, including text, images, forms and sounds. Further guidance can be provided by the Corporate Accessibility Branch.

Any non-conformance shall be documented and approved by the General Manager as per the process outlined for newly developed or procured websites or web applications

## **References**

[Accessibility 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](#)

## Definitions

**Web Asset:** A website or Web application

**Web Content Accessibility Guidelines (WCAG)** refers to a single standard developed by the Worldwide Web Consortium (W3C) with a goal of providing guidelines to make web content more accessible to people with disabilities.

**Website:** 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 applications** 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 content** refers to page level content, which may be a single web page, a PDF document, or similar type. Web content (in this policy) is identified as a sub-group of a website or web application.

**Conform/Conformance** refers to adherence to the WCAG Guidelines and Success Criteria. All requirements of the standard must be satisfied. Conformance is stated on FULL web pages (or collection thereof). It cannot be achieved or stated if part of any web page is excluded.

**Compliant/Compliance** refers to meeting the City’s obligation to the AODA legislation.

**Not practicable:** applies when the technology to make the website, application or content fully compliant with all WCAG 2.0 A and AA criteria is not readily available or the information is lost in the conversion process and cannot be conveyed in a meaningful way.

**WCAG-EM** refers to a defined methodology that provides guidance on how to evaluate websites and applications to determine their conformance to WCAG 2.0.

**WCAG-EM Report Tool** is a template that helps generate a conformance report according to the Website Accessibility Conformance Evaluation Methodology.

**PDF U/A** is the industry name given to ISO 14289, the international technical standard that provides definitive terms and requirements for accessibility in PDF documents and applications.

### **AODA/Integrated Accessibility Standards (schedule)**

(4) Designated public sector organizations and large organizations for their internet websites shall meet the requirements of this section in accordance with the following schedule:

1. By January 1, 2014, new internet websites and web content on those sites must conform with WCAG 2.0 Level A.
2. By January 1, 2021, all internet websites and web content must conform with WCAG 2.0 Level AA, other than,
  - i. success criteria 1.2.4 Captions (Live), and
  - ii. success criteria 1.2.5 Audio Descriptions (Pre-recorded). O. Reg. 191/11, s. 14 (4).

## **Keywords**

Internet  
Websites  
Web content  
Web applications  
Accessibility

## **Enquiries**

For more information on this policy contact  
Program Manager, Web Services Branch  
Service Innovation and Performance Department

## **Appendices**

[Accessibility status applications/web products form](#)  
[Web Accessibility Testing and Conformance Reporting Manual](#)  
[Web Accessibility Testing and Conformance Reporting Reference Material](#)

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