 <p>City of Peterborough</p>	<p>Integrated Accessibility Standards Information and Communications Procedure</p>
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Department:	Corporate Services
Division:	N/A
Section/Function:	Accessibility
Approval Level:	Corporate
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1.0 Purpose

- 1.1. This Procedure implements, in part, the City’s Accessible Customer Service Policy #0020 and the Integrated Accessibility Standards Policy #0030.
- 1.2. This Procedure provides direction to City Representatives on how to create, notify, receive and provide Information and Communications in ways that are accessible for people with Disabilities. The intent is to help people with Disabilities access sources of Information and Communications that people rely on every day.
- 1.3. This Procedure assists in the requirement to comply with sections 11 to 14 and section 19 of the Integrated Accessibility Standards, [Ontario Regulation 191/11](#) (“IAS”) made under the [Accessibility for Ontarians with Disabilities Act, 2005](#) (“AODA”).

2.0 Application

- 2.1. This Procedure applies to every City Representative that will create, notify, receive and provide Information and Communications.
- 2.2. This Procedure does not apply to:
 - a) Products or product labels, unless otherwise stated;
 - b) Unconvertible Information and Communications; and
 - c) Information and Communications that the City can’t control.

3.0 Definitions/Acronyms (As Required)

Accessibility – Equal access to Goods, Services and/or Facilities for all people.

Accessible Formats – Formats that are an alternative to standard print and are accessible to people with Disabilities. Accessible formats may include, but are not limited to, large print,



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recorded audio, electronic formats such as DVD's and CD's, Braille and other formats usable by people with Disabilities. The term is also known as "alternate formats".

Agent – A person or business providing Goods, Services and/or Facilities on behalf of the City through a contract or agreement.

City – The Corporation of the City of Peterborough, its agencies, boards, commissions and advisory committees, excluding the City of Peterborough Holdings Inc.

City Representative – An employee, elected or appointed official, Agent, volunteer or otherwise who acts on behalf of the City.

Communication Supports – Methods of accessing information that people with Disabilities may need. Some examples include plain language, sign language, reading the Information to them, adding captioning to videos or using written notes to communicate.

Communications – The interaction between two or more people or organizations, or any combination of them, where Information is provided, sent or received.

Content Approver – A designated staff person within each department or division who is responsible for approving the Website content for departmental and divisional web pages.

Content Provider – A designated staff person within each department or division who is responsible for managing the Website content for departmental and divisional web pages.

Conversion Ready – An electronic or digital format that assists conversion of Information into an Accessible Format. For example: Braille, large print, audio cassettes, CDs, DVDs, etc.

Disability – "Disability" as defined in the Ontario **Human Rights Code**, means:

- a) any degree of physical disability, infirmity, malformation or disfigurement that is caused by bodily injury, birth defect or illness and, without limiting the generality of the foregoing, includes diabetes mellitus, epilepsy, a brain injury, any degree of paralysis, amputation, lack of physical co-ordination, blindness or visual impediment, deafness or hearing impediment, muteness or speech impediment, or physical reliance on a guide dog or other animal or on a wheelchair or other remedial appliance or device;
- b) a condition of mental impairment or a developmental disability;
- c) a learning disability, or a dysfunction in one or more of the processes involved in understanding or using symbols or spoken language;
- d) a mental disorder; or
- e) an injury or disability for which benefits were claimed or received under the insurance plan established under the Workplace Safety and Insurance Act, 1997.



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Goods, Services and/or Facilities – As defined in the Purchasing By-law 10-132, Goods and/or Services means any one or more of supplies, personal property, construction materials, construction services, insurance, employee benefits, construction of assets and maintenance and service contracts. “Facilities”, means a building or place that provides a particular Good and/or Service.

Information – Includes data, facts and knowledge that convey meaning and that exist in any format such as text, audio, digital or images.

Information Technology Services – Service providers employed by the City to develop and maintain technology solutions (currently provided by Peterborough Technology Services).

Unconvertible Information – Information that is not technically feasible to convert, or the technology to convert the Information is not readily available.

Website – A set of web pages that are available to the public and contain a collection of related text, images, videos, audio and other digital assets. It is accessible through an Internet address known as a Uniform Resources Locator (URL).

Website Governance – A system used to analyze Websites and report errors to ensure Website accountability and compliance with Website standards.

Web Content Accessibility Guidelines (WCAG) – An international standard for making Websites and Web content accessible to people with a wide range of Disabilities.

WCAG 2.0 Level A and Level AA – Different conformance levels in WCAG version 2.0. To meet conformance Level A, all Level A success criteria must be met. To meet conformance Level AA, all Level A and Level AA success criteria must be met.

4.0 Procedure

4.1. Accessible Formats and Communication Supports

The City will:

a) **Create Accessible Formats and Communication Supports**

- City Representatives will ensure Information is formatted to comply with the City’s “Guide to Accessible Documents”.

Information formatted to meet the City’s “Guide to Accessible Documents” will most often result in an appropriate Accessible Format and Communication Support. For example, the Information will be compatible with screen reading software, which means a document can be emailed to a person with vision loss and used with their own assistive technology.

There may be instances when Information formatted to meet the City's "Guide to Accessible Documents" does not result in an appropriate Accessible Format and Communication Support. In these instances, an alternate format will be provided, upon request. Formatting a document to the guide will ensure it is Conversion Ready.

b) Notify the Public of Accessible Formats and Communication Supports

- The Accessibility Coordinator will provide notification to the public about the availability of Accessible Formats and Communication Supports on the City's main Website. The "Request for Information in an Accessible Format" form will be linked to the public notice.
- City organizations with a Website external to www.peterborough.ca will provide notification to the public about the availability of Accessible Formats and Communication Supports on their own Website, with a link to either their own "Request for Information in an Accessible Format" form or the form on the City's Website.

c) Receive Requests for Accessible Formats and Communication Supports

- A person who requires Information in an Accessible Format may complete the "Request for Information in an Accessible Format" form and submit by email, telephone, facsimile, mail or in person.
- City Representatives will receive requests submitted in person or by telephone.
- The Accessibility Coordinator will receive requests submitted by email, fax, or mail.

d) Respond to Requests for Accessible Formats and Communication Supports

City Representatives will provide Accessible Formats and Communication Supports for people with Disabilities, upon request, and will:

- Consult with the person making the request to make sure the appropriate format or support is provided. For example, not all people who are blind use Braille. Information provided in large print format may be acceptable.
- Provide Information in a timely manner that takes into account the person's needs due to the Disability. It will not take significantly longer than requests for the same Information available in standard format.
- Provide Information at a cost that is no more than the regular cost charged to others.
- Explain why, if it is not possible to provide Information in an Accessible Format, and provide a summary of content related to the Unconvertible Information.

- Forward the customer's contact Information to the Accessibility Coordinator, if further assistance with the response to the request is required. The Accessibility Coordinator will consult with the customer to find a suitable alternative solution.

e) **Train City Representatives on Accessible Formats and Communication Supports**

The Accessibility Coordinator will provide training on the rules outlined in the City's "Guide to Accessible Documents".

4.2. Feedback

City Representatives that create feedback forms or receive and respond to feedback will:

- Ensure that the process is accessible to people with Disabilities.
- Provide Accessible Formats and appropriate Communications Supports, upon request.
- Continue with the obligations of Procedure 0020-P04 Feedback for Accessible Customer Service. The Procedure includes Information on how to provide notice of the feedback process, receive feedback and respond to feedback.

4.3. Emergency Procedures, Plans or Public Safety Information

The City will:

- Provide emergency procedures, plans or public safety Information that is available to the public, in an Accessible Format or provide them with appropriate Communication Supports, upon request, as soon as practicable.

This procedure does not apply to real-time public safety Information used during an actual emergency, such as an evacuation.

- Determine what Information is to be made available to the public. This may include incidents that threaten life, property, operations or the environment. This also includes Information governed by legislation such as, but not limited to:

Fire Code – all buildings required to have a fire safety plan as per 2.8.1.1 of Ontario's [Fire Code](#), must keep the plan in an approved location in the building.

Emergency Management and Civil Protection Act – requires the City to have a publicly shared all-hazards emergency plan.

4.4. Accessible Websites and Web Content

The City will make Websites accessible to people with Disabilities by conforming to international standards for Website Accessibility.

- a) Content Providers and Content Approvers will:
- Ensure Websites and Website based applications published after January 1, 2012, conform to WCAG 2.0 Level A by January 1, 2014 and Level AA by January 1, 2021.
 - Ensure Website content, including Information in Word and PDF format, published after January 1, 2012, are formatted to comply with the City's "Guide to Accessible Documents" by January 1, 2014.
 - Make revisions to Website content that is not in compliance with WCAG, as reported by Information Technology Services.
- b) Information Technology Services will:
- Use tools, such as a Website Governance service, to report any Accessibility compliance errors.
 - Notify Content Providers of Website Accessibility compliance errors and direct them to make revisions to ensure compliance with WCAG.
 - Assist Content Providers with Website revisions, if required.
- c) Compliance with the requirements of WCAG 2.0 does not apply to:
- Websites and Website based applications that:
 - i. rely on the availability of commercial software and/or tools;
 - ii. the City does not control directly; or
 - iii. have a contractual relationship that does not allow for modification of the product.
 - Intranet Website.
 - Subtitles for real-time audio and video, as described in WCAG 2.0 Level AA, success criteria 1.2.4 Captions (Live).
 - Subtitles for pre-recorded video content, as described in WCAG 2.0 Level AA, success criteria 1.2.5 Audio Descriptions (Pre-recorded).
 - Technological software limitations such as online mapping and complex diagrams. In such cases, an accessible alternate version or summary of the content related to the Unconvertible Information will be provided, upon request.

4.5. Public Libraries

The Peterborough Public Library ("PPL") will:

- Provide or arrange for people with Disabilities to obtain Accessible Formats of library materials in the library's collections, where the materials exist.

- Provide public information about the availability of accessible materials and communication supports. Provide the public information in an Accessible Format or with appropriate Communication Supports, upon request. For example, the PPL may post the Information on their Website, library posters, promotional materials, etc.
- Consider Accessibility when procuring new library materials, so that collections are accessible to the widest range of people.

5.0 Appendix, Related Documents & Links

(Note: All references refer to the current version, as may be amended from time to time)

5.1. Pertinent Resources:

- Ontarians with Disabilities Act, 2001 (ODA)
www.e-laws.gov.on.ca/html/statutes/english/elaws_statutes_01o32_e.htm
- Accessibility for Ontarians with Disabilities Act, 2005 (AODA)
www.e-laws.gov.on.ca/html/statutes/english/elaws_statutes_05a11_e.htm
- Accessibility Standards for Customer Service, (Ontario Regulation 429/07)
www.e-laws.gov.on.ca/html/regs/english/elaws_regs_070429_e.htm
- Integrated Accessibility Standard (Ontario Regulation 191/11)
www.e-laws.gov.on.ca/html/regs/english/elaws_regs_110191_e.htm
- Web Content Accessibility Guidelines (WCAG) 2.0
www.w3.org/TR/WCAG/
- Ontario's Fire Code
www.e-laws.gov.on.ca/html/regs/english/elaws_regs_070213_e.htm

5.2. Related Policies:


- Policy 0020, Accessible Customer Service
- Policy 0030, Integrated Accessibility Standards

5.3. Related Procedures:

- Procedure 0030-P02, Integrated Standards Employment
- Procedure 0030-P03, Integrated Standards Transportation
- Procedure 0030-P04, Incorporating Accessibility when Purchasing Goods, Services and/or Facilities

5.4. Related Forms:

- Form 0030-P01-F1, Request for Information in an Accessible Format

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5.5. Miscellaneous:

- City of Peterborough “Guide to Accessible Documents”

6.0 Amendments/Reviews

Date (yyyy-mm-dd)	Section # Amended	Comments
2013-08-21	N/A	Procedure approved by Administrative Staff Committee.

Next Review Date:	2015-01-01
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