



## Council report

<b>Meeting date:</b>	August 4, 2020
<b>Title:</b>	Accessibility of corporate records for the municipal website
<b>Prepared by:</b>	Jonathan Zettel, Co-ordinator of the CAO
<b>Reviewed by:</b>	Laura Johnston, CAO

### Recommendation

That council receives the report by Co-ordinator Zettel, Accessibility of corporate records for the municipal website for information; and

That staff use remediation software to continue to convert corporate records into accessible versions from January 2018 onward and post to the website by January 1, 2021.

### Executive summary

This report is in response to resolution no. 174-20 that directed staff to provide a solution for making corporate records available on the new, accessible corporate website.

### Background and discussion

On October 1, 2019 council passed resolution no. 489-19 directing staff to facilitate the build of a new website in order to be compliant with Accessibility for Ontarians with Disabilities (AODA) by January 1, 2021.

In late June, a new corporate website was launched. Staff worked closely with the website vendor to ensure searchability, navigability, web pages, images, documents and other components meet or exceed AODA standards.

In migrating files to the new site, staff started with converting and posting the frequently requested corporate records. The balance of the documents from the past two years are planned to be posted to the site by January 1, 2021.

On July 21, 2020 council passed resolution no. 174-20 which directed staff to make corporate records that were previously available on the old website, available through the new website by August 21, 2020 and that the Municipality of West Grey recommit to identifying mechanisms by which publicly available documents, as well as future council business documents, will be made accessible and available by January 1, 2021. To that end, staff have investigated remediation software and created a schedule to meet this directive.



August 4, 2020 (2)

Additionally, West Grey's delegation request to the August virtual conference of the Association of Municipalities of Ontario (AMO) to discuss the challenges of and the options for transitioning corporate records to accessible websites was approved. Staff is recommending remediation software to transition files and the delegation will seek clarification on scope and expectations of the legislation.

## **AODA standards**

According to the AODA, all public websites and web content in Ontario must meet Web Content Accessibility Guidelines (WCAG) 2.0 AA standards as of January 1, 2021. The guidelines were developed in co-operation with individuals and organizations from around the world, with a goal of providing a single shared standard for web content accessibility.

In section 4.1 of the WCAG guidelines, reference to third party content states:

### **Statement of partial conformance – third party content**

Sometimes, web pages are created that will later have additional content added to them. For example, an email program, a blog, an article that allows users to add comments, or applications supporting user-contributed content. Another example would be a page, such as a portal or news site, composed of content aggregated from multiple contributors, or sites that automatically insert content from other sources over time, such as when advertisements are inserted dynamically.

In these cases, it is not possible to know at the time of original posting what the uncontrolled content of the pages will be. It is important to note that the uncontrolled content can affect the accessibility of the controlled content as well. Two options are available:

1. A determination of conformance can be made based on best knowledge. If a page of this type is monitored and repaired (non-conforming content is removed or brought into conformance) within two business days, then a determination or claim of conformance can be made since, except for errors in externally contributed content which are corrected or removed when encountered, the page conforms. No conformance claim can be made if it is not possible to monitor or correct non-conforming content;

OR

2. A "statement of partial conformance" may be made that the page does not conform, but could conform if certain parts were removed. The form of that statement would be, "This page does not conform, but would conform to WCAG 2.0 at level X if the following parts from uncontrolled sources were removed." In addition, the following would also be true of uncontrolled content that is described in the statement of partial conformance:

It is not content that is under the author's control.



August 4, 2020 (3)

It is described in a way that users can identify (e.g., they cannot be described as "all parts that we do not control" unless they are clearly marked as such.)

Staff is not recommending using a third-party application to house West Grey's corporate records. This approach is time consuming, will be a duplication of efforts, and ultimately does not align with the corporate goal of creating accessible content. In essence, this approach is not in keeping with the spirit of the legislation.

### **Records transition**

Staff is recommending files from 2016 be remediated and posted to the new website. Corporate records created prior to West Grey's optimal character recognition (OCR) upgrade, in 2016, remain difficult, and in some cases, impossible to remediate. Because the text of these documents is unidentifiable they are impossible to remediate without retyping the entire document.

### **Legal and legislated requirements**

All public websites and web content in Ontario must meet Web Content Accessibility Guidelines (WCAG) 2.0 AA standards as of January 1, 2021.

### **Financial and resource implications**

Remediation software requires an annual subscription of \$2,000 to \$5,000 per year, depending on the number licences.

Should council wish to outsource the remainder of the corporate records that need to be converted, the cost varies between \$5 to \$200 per page, depending on page elements.

### **Staffing implications**

In addition to the AODA training staff receive, staff from across the corporation will be trained on the remediation software, given an overview of how to make a document accessible, and Web Content Accessibility Guidelines (WCAG) 2.2 AA compliance. Staff are recommended this be funded by the 2020 Municipal Modernization Grant, project allocation in 2020, and the IT budget from 2021 and onward.

### **Consultation**

eSolutions (West Grey website vendor)  
Laura Johnston, CAO  
Genevieve Scharback, Clerk  
Kerri Mighton, Director of Finance/Treasurer  
Lindsey Glazier, Administrative Assistant, Clerk's Office



August 4, 2020 (4)

## Alignment to strategic vision plan

Pillar: Work together

Goal: Clear communication

Strategy: Create accessible and informative content in a variety of formats

## Attachments

None.

## Next steps

Staff will subscribe to a remediation software and transition documents from 2018 onward to the new website by January 1, 2021. Records from 2016 and 2017 will be converted in 2021.

To ensure AODA compliance, staff will investigate costs and parameters of an AODA website audit for early 2021.

Respectfully submitted:

Jonathan Zettel, Co-ordinator, Office of the CAO