

# The City of Belleville

## **Information and Communication Standards Policy**

Adopted: July 2019

Reviewed:

### 1. Policy Statement

The Corporation of the City of Belleville, "the City", is committed to excellence and openness in local government by ensuring accessible, responsive representation. To this end, we will create and deliver public information and communications in accessible formats. Furthermore, we will provide notice to the public that alternate formats or communication supports are available upon request.

### 2. Purpose

This policy supports our efforts to achieve consistent high quality, accessible standards for any information and communications produced by or on behalf of the City.

Through this policy, we demonstrate our commitment to provide all people with equal opportunity to access, obtain, and benefit from our municipal goods, services, programs, and facilities.

This policy supports our efforts to identify, remove, and prevent communication and systematic barriers that may prevent us from fostering an inclusive community.

# 3. Application

This policy applies to any employee, volunteer, or third party representative of the City who authors, publishes, or delivers public information or communications on behalf of the City. We will enforce accessibility criteria during procurement, including contract components related to accessible information and communications standards, to ensure awareness and compliance by third parties.

This policy does not cover standards for person-to-person interactions, which are otherwise outlined by our Customer Service Policy and Procedures.

# 4. Principles

### 4.1 Accessible Formats

All public information and communications produced by or on behalf of the City will be in an accessible format that is compatible with assistive technology. We will also give notice that alternate formats or communications supports are available upon request. For information or communications to be in an accessible format it must meet the requirements as outlined in the our Accessible Information and Communications Guide, which includes criteria for the following components:

- appropriate use of colour
- colour contrast
- text and language
- document format and structure
- logical reading order

- signage standards
- use of templates
- images, non-text elements, and alternative text

When producing, procuring, or delivering information and communications, applicable parties must consider all factors that will affect its accessibility for people with disabilities, including those who may:

- be Blind
- be partially sighted or have vision loss
- be Deaf or Hard of hearing
- have a developmental, cognitive or learning disability
- have a mental health condition
- have a physical health condition
- have any mobility limitations

#### 4.2 Feedback

We will maintain a feedback process for the public to submit questions, comments, or concerns regarding the accessible provision of municipal goods, services, programs, and facilities. Processes for submitting, receiving, and responding to feedback will be in accessible formats, and we will give notice that alternate formats or communications supports are available upon request. We will respond to feedback upon request, and will do so in a manner that takes into account an individual's abilities and selected method of correspondence.

# 4.3 Training

Any City employee or volunteer who is responsible for producing, procuring, or delivering public information and communications will receive training specific to their job duties about how to create and ensure information and communications are in accessible formats that meets the required standards. Training can include but is not limited to creating accessible:

- Word, PDF, and InDesign documents, and PowerPoints
- web design and web content
- print and electronic materials
- meetings and presentations
- signage design

### 5. The Municipal Website and Web Content

The municipal website(s) and all web content will be accessible and compliant with Web Content Accessibility Guidelines (W.C.A.G) 2.0 Level AA standards. Anyone who edits or posts information or communications on the municipal website will receive training specific to their job duties about how to create and ensure it is in an accessible format that meets the required standards. Permissions to edit or post to the municipal website will not be granted without having completed this training.

The municipal website must be compatible with assistive devices, such as screen readers, and provide users with multifunctional usage options, such as enlarging text, adjusting contrast, and keyboard navigation. Design, upkeep, and maintenance of the municipal website and web content will continually endeavor to uphold the four main principles of web accessibility which are, as detailed by the W.C.A.G, to be perceivable, operable, understandable, and robust.

## 6. Requests for Alternate Formats and Communication Supports

Upon request, we will make every reasonable effort to provide any public information and communications produced by or on behalf of the City in an alternate format or with communication supports. In discussion with the person who made the request and taking into account the individual's abilities, the City will determine the appropriate alternate format or communication support.

Alternate formats can include, but are not limited to:

- large print
- Braille
- recorded audio
- closed captioning

- descriptive video
- text transcripts
- print to electronic or electronic to print formats

Communication supports can include, but are not limited to:

- reading information out loud
- exchanging written notes
- sign language
- assistive devices, such as lpads
- using yes/no questions
- picture communication exchanges
- using a Teletypewriter
- clear speech and plain language

### 6.1 Notice to the Public

We will post notice that alternate formats or communication supports are available upon request in a conspicuous location in all municipal facilities that are open to the public, as well as on the municipal website. Additionally, the City will clearly provide this notice for:

• any public emergency response procedures, plans, or public safety information produced by or on behalf of the City

- any public meetings, information sessions, or events held by the municipality
  where information or communications will be produced, distributed, or displayed.
  Notice must be posted in a conspicuous location in all municipal facilities, on the
  municipal website, and through any promotional or advertisement material well in
  advance of the meeting date.
- council and committee agendas and minutes
- standard public documents as appropriate

#### 6.2 Process

We will receive requests for alternate formats or communication supports through various channels, including but not limited to: email, online, in person, in writing, or over the telephone. If the request is not submitted via the online form, the employee or volunteer who first receives the request will document it using our "Accessibility Request Form". This form will be used for recording the details of the request, tracking the response, and retained for municipal records.

The department originally responsible for producing or procuring the information or communication is primarily responsible for responding to the request. Once completed, the department will forward the "Accessibility Request Form" to the Accessibility Coordinator to be filed and stored.

#### 6.3 Associated Cost

If the information or communication is offered at no cost in its original format, we will not charge a fee when a request is made for an alternate format or communication support. If there is normally a cost for the information or communication in its original format, we may charge that same amount, but no additional fees, for an alternate format or communication support.

### 6.4 Response Time

We will respond to all requests for alternate formats or communication supports in a timely manner. A representative from the City will be in contact with the person who made the request within two business days of having received it. We will complete a request as soon as possible, and within a maximum of five business days. If completing a request will take longer than five business days, we will inform the person who made the request and provide an explanation and an expected completion or execution time.

## 6.5 Inaccessible Information and Undue Hardship

We will make every reasonable effort to fulfill all requests for information and communications up to the point of undue hardship. If a request cannot be completed, we will provide an explanation to the person who made the request about why it cannot be fulfilled. We will work with the person who made the request to ensure their needs are met by considering other options for relaying the information or communication that was requested.

Some documents may be inherently inaccessible due to their nature or function, for example a budget document. Instead of converting these documents into alternate formats, we will provide communication supports to ensure any requested information is conveyed and understood.

After discussion with the person who made the request, we reserve the right to determine an appropriate, effective, and cost and time efficient method of relaying inaccessible information or communications.

#### 7. Public Events

We will prioritize accessibility when planning public meetings, information sessions, or other public events. Any information or communications delivered or presented at a public event must meet the standards contained within our "Information and Communications Guide". Alternate formats and communication supports must be either available upon request or readily available depending on the nature of the event. Public events must always meet basic accessibility requirements for:

- interior and exterior access to the venue
- access to accessible washrooms
- seating
- signage
- venue characteristics (ex. lighting, sightlines, background noise)
- promotional materials and notice to the public
- notice for availability of accommodations, alternate formats, or communication supports upon request

Beyond these basic requirements, we will determine appropriate accessibility features by considering the nature of the event, referencing our "Information and Communications Guide", and consulting with the Belleville Accessibility Advisory Committee.

### 8. General Signage Requirements

We will follow accessible design criteria when creating, purchasing, or acquiring new or redeveloping signage including regulatory, warning, identification, wayfinding, informative, recreational, and advertisement or tourism signage.

Signage projects with special features should consult further resources, the Belleville Accessibility Advisory Committee, and people with disabilities when planning and designing the project. Special features may include, but are not limited to:

- lit or illuminated signs
- audible signs
- electronic signs
- signs with unique uses (such as signage meant for children or at children's facilities)

# 9. Maintaining and Reviewing Standards

We will not use or accept public information or communications that do not meet the standards set out in this policy and through our "Information and Communications Guide".

#### 9.1 Evaluations

Senior managers and supervisors are responsible for ensuring information and communications produced by or on behalf of their department comply with these standards. In the case of repeated non-compliance concerns, we will evaluate the challenges and consider re-training options or process modifications.

We will perform quarterly audits of the municipal website to ensure functionality, content, and documents and images posted to the website site continue to meet our standards. If the website audit reports non-compliance or other issues, we will work to bring everything back into compliance by the next quarterly audit. This may include modifications to the website and mandatory remediation or removal of non-compliant content.

# 9.2 Extenuating Circumstances

If there are extenuating circumstances surrounding why information or communication do not meet these standards, we may grant a temporary exception. Temporary exceptions will only be granted with specific timelines as to when and how the information or communication will be made compliant. Unless it is an extreme case, time restrictions or deadlines are not acceptable grounds to receive an exception to these standards.

This does not apply to information or communications deemed inaccessible or unconvertible to the point of undue hardship (reference Section 5.5).

## 10. Exceptions

The City's information and communication standards do not apply to:

- products or product labels that are not produced by or on behalf of the City
- information that the City does not control, directly or indirectly