## Guideline

There are situations where it is not practical to present content in an accessible format and documents have limited accessibility levels. Examples of such exceptions include:

- Mapping or GIS data;
- Engineering drawings or complex technical data;
- Legacy applications or data that cannot be updated or cannot be updated with reasonable effort/expenses.
- Vendor web applications where the municipality is unable to negotiate contractual obligation to maintain accessibility;
- Presentation content where rendering accessible would hinder the ability to achieve its intended purpose;
- Content that cannot be rendered accessible without significant impact; and
- External contributors may provide content which does not comply with web accessibility standards. Converting such document to an accessible format is deemed non-practicable.

This is not an exhaustive list and at this time there are no reported decisions interpreting the "not practicable" exemption; however, Accessibility Ontario (a training and development organization that helps businesses in Ontario understand and comply with the AODA) has provided its non-binding view that factors relevant to practicability may include:

- availability of accessible goods, services or facilities; or
- technological compatibility between older products and newer ones being procured.

## 2023 changes have been highlighted in green.

## **Website Compliance**

It is important moving forward that the municipal website remains in compliance. This means (in general):

- If the content cannot be built into the webpage and has to be a document uploaded, the document (word or PDF) must be checked for accessibility and be labelled as such (i.e. accessible in the document title) prior to uploading.
- Form Builder is preferred to be used over uploading a fillable PDF (sometimes they can be tricky to make 100% accessible depending on the format they were created) however, in some cases, a fillable PDF must be used and checked for accessibility prior to uploading.
- Keeping up with the best practices of editing website content (the web working group members have all been trained on this through the training in 2019). This

includes using the functions available in iCreate such as proper headings, paragraphs, table styles, Alternate text for images, embedding hyperlinks and email addresses.

Submission Type	Responsible Department	Reason for exemption	
Agendas, minutes and reports from internal and external boards and committees	Clerk	Submissions from external contributors External contributors may provide content which does not comply with web accessibility standards. Converting such document to an accessible format is deemed non-practicable	
Council Agenda including submissions including presentations, reports, delegations, communications	Clerk	Submissions from external contributors technical data. External contributors may provide content which does not complessible with web accessibility standards. Converting such document to an accessible format is deemed non-practicable	
Proposed Planning page/Zoning By-law  Active Planning Files	Planning	Technical data, Mapping or GIS data. External contributors may provide content which does not comply with web accessibility standards. Converting such document to an accessible format is deemed non-practicable	
Site Plan Guides	Planning	Form is sourced from an external host	
Application for a permit to construct or demolish Farm Data Sheet Form	Building	Form is sourced from an external host	
Energy Efficiency Design Summary Form	Building	Form is sourced from an external host	

- Part 9 Residential - 2017			
Plumbing related application and fees form	Building	Form is sourced from an external host	
General Review/Commitment Certificate		Form is sourced from an external host	
Demolition permit application checklist, Sewage System design information form and typical floating slab detail, Engineered Floating Slab Design, Deck Design Guide	Building		
Application to the Council or Assessment Review Board (Form 357)	Building	Form is sourced from an external host	
Post Election Reporting and Certified Candidates Financial Statements	Clerk	Regulatory Compliance. External contributors provide content which does not comply with web accessibility standards. Converting such document to an accessible format is deemed non-practicable	
Audited Financial Statements	Finance	Document is sourced from an external host.	
Tender Documents	Finance	External contributors may provide content which does not comply with web accessibility standards. Converting such document to an accessible format is deemed non-practicable.	

Asset management Plan	Finance	Regulatory Compliance. External contributors provide content which does not comply with web accessibility standards. Converting such document to an accessible format is deemed non-practicable.	
Detailed Budget documents – forms part of the agenda	Finance	Public transparency. Converting such document to an accessible format is deemed non-practicable.	
Annual Water Distribution System Report to Council	Environmental Services	Public transparency. Converting such document to an accessible format is deemed non-practicable.	
MECP Annual Water Compliance Report	Environmental Services	Regulatory requirement to publish this document to the public. This is an external Provincial Government form and converting such document to an accessible format is deemed non-practicable.	
MECP Water Distribution System Inspection Report	Environmental Services	Public transparency. This is an external Provincial Government form and converting such document to an accessible format is deemed non-practicable.	
QMS Operational Plan	Environmental Services	Regulatory requirement to publish this document to the public. Converting such document to an accessible format is deemed non-practicable.	
Water System Financial Plan 054-301	Environmental Services	Regulatory requirement to publish this document to the public. Report prepare an outside consultant and converting such document to an accessible formatis deemed non-practicable.	
Annual Wastewater Report	Environmental Services	Public transparency. Converting such document to an accessible format is deemed non-practicable.	

MECP Wastewater Treatment Inspection Report	Environmental Services	Public transparency. This is an external Provincial Government form and converting such document to an accessible format is deemed non-practicable.	
Water and Wastewater Master Plan	Environmental Services	Report prepared an outside consultant and converting such document to an accessible format is deemed non-practicable.	
Notice of Completion (ESR)	Environmental Services	Regulatory requirement to publish this document to the public. Converting such document to an accessible format is deemed non-practicable.	
Application for Water and Sewer Service	Environmental Services	Fillable pdf form	
Application for Water Service	Environmental Services	Fillable pdf form	
Drain Maintenance Request	Environmental Services	Fillable pdf form	
Application for Entranceway	Environmental Services	Fillable pdf form	
Half Load Road Map (Overall Municipality)	Transportation Services	Mapping Data. Converting such document to an accessible format is deemed non-practicable	
Half Load Road Map (Huron Park & Centralia)	Transportation Services	Mapping Data. Converting such document to an accessible format is deemed non-practicable	
News and Notices	Communications	Notices prior to January 1, 2021 that had attachments have not been removed or updated into an accessible format – deemed non-practicable	

Water and Waste Water Rate By-Law	Finance / Clerk's Department	Chats/tables outline fees within by-law, converting to accessible format deemed non-practicable	
Fire Master Plan (2021)	Fire Services	Report prepared an outside consultant and converting such document to an accessible format is deemed non-practicable	
Community Risk Assessment (2021)	Fire Services	Report prepared an outside consultant and converting such document to an accessible format is deemed non-practicable	

## Appendix "A" to Document List – Not Accessible Listing

Administrative Amendments	Section of Policy	Details	Approvals
2021/12/20	n/a	1 <sup>st</sup> submission to Council following review by SMT	Council
2022.05.05	Environmental Services	pdf fillable forms	update