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1. Policy Objective

1.1. The Town of Ajax is committed to ensuring that all documents produced by our organization are accessible to individuals with disabilities, in compliance with relevant accessibility standards including *Ontario Regulation 191/11 - Integrated Accessibility Standards Regulation*, as amended, and *Web Content Accessibility Guidelines (WCAG) 2.0 Level AA*, as amended, other than:

- a) Success criteria 1.2.4 Captions (live); and
- b) Success criteria 1.2.5 Audio Descriptions (prerecorded)
 As noted in Sec. 14.4.2 of the *Integrated Accessibility Standards Regulation*.

2. Scope

- 2.1. This policy applies to:
- Documents uploaded to and posted on the Town’s website or intranet; and
 - Printed documents/materials.
- 2.2. This policy applies to all employees, volunteers, elected officials, and third-party contractors who are conducting business on behalf of the Town.

3. Definitions

- 3.1. **Accessible Document:** Conforms to the World Wide Web Consortium Web Content Accessibility Guidelines (WCAG) 2.0 Level AA and is produced as an accessible Word, Excel, PowerPoint, PDF document, etc. that incorporates the required accessibility considerations identified through this policy (e.g. tagged PDF, Alt text for images, etc.)
- 3.2. **Accessible Document Liaison:** the staff member(s) appointed to a particular section or department responsible for overseeing accessible document compliance before posting content/documents online, publishing, or distributing materials.
- 3.3. **Accessible Format:** formats that are an alternative to standard print and are accessible to persons with disabilities. Accessible formats may include but are not limited to” large print (18pt font+). Recorded audio, electronic formats such as DVDs or CDs, Braille, and other formats usable by people with disabilities.

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- 3.4. **Adobe Full Check/Accessibility Check:** For PDF documents, the [Adobe Accessibility Check](#) in Adobe Acrobat can be used to identify accessibility errors within a document.
- 3.5. **Alternative Format Notice:** For all materials that will be distributed by the Town to the public and any complex document where full compliance cannot be met and an exception is approved, the Alternative Format Notice must be included. It is recommended that this notice be placed at the top of the first page of the document:
 - This content is available in alternative formats upon request by contacting 905-683-4550 or emailing contactus@ajax.ca.
- 3.6. **Alternative (ALT) Text:** invisible descriptions of images that are read aloud by a screen reader. Adding ALT text enables authors to include images and provide the content in an alternative text-based format. If no ALT tag is provided, a screen reader would read an image as “image” or the file name.
- 3.7. **Bookmarks:** a type of link with representative text in the Bookmarks panel of the navigation pane. Each bookmark connects to a different view or page in the document.
- 3.8. **Complex Documents:** are documents which may contain graphs, tables, images, or technical drawings that will require alternative description attributes or formats to provide an alternative way to communicate the content. Complex documents may also include files that contain footnotes and annotations.
- 3.9. **Document Creators:** the person(s) responsible for the development of a document or information material on behalf of the Town for an internal/external customer. Document Creators may include Town staff, or third parties engaged by the Town to create documents or deliver services on behalf of the Town.
- 3.10. **Portable Document Format (PDF):** a file format that has captured all the elements of a printed document as an electronic image that you can view, navigate, print, or forward. PDF files are created using Adobe Acrobat.
- 3.11. **Reading Order:** a feature of a PDF which determines the sequence in which elements in a document are read by assistive devices/technologies.
- 3.12. **Tag and Tag Tree:** a feature of a PDF which provides a representation of the document structure, describing headings, sections, and bookmarks, amongst



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other elements. A logical tag structure represents the organizational structure of the document; therefore tags are essential to the reading order and navigation, particularly for long, complex documents.

- 3.13. **Web Content Accessibility Guidelines (WCAG):** an international standard for making websites and web content accessible to people with a wide range of disabilities.

4. Responsibilities

- 4.1. **Document Creators:** to adhere to the Town of Ajax Accessible Document Standards when creating documents. For materials that will be distributed by the Town to the public, the **Alternative Format Notice** (Section 3.5) shall be included on the first page of the document).

- 4.1.1. DMS document owners are responsible for ensuring any DMS templates (e.g. letterhead, forms, reports, etc.) used by the department/corporately adhere to the policy.

- 4.2. **Accessible Document Liaisons:** to review documents for compliance with the Accessible Document Standards, and work with Document Creators to remediate any error(s) before a document is finalized, published, and/or distributed.

Accessible Document Liaisons will receive monthly reporting on documents identified as not accessible and shall work with Document Creators to address and remediate such errors.

- 4.3. **Supervisors and Managers:** to ensure that they and their staff are familiar with and comply with the Accessible Documents Standards, and that all third-party contractors creating documents on behalf of the Town adhere to the Accessible Documents Standards.
- 4.4. **CAO/Department Head:** to review Accessible Document Standards and require staff to adhere to such requirements when creating documents.
- 4.5. **Digital Communications Officer:** to monitor and report on the state of online document accessibility using software that will review and flag documents that are not accessible. The Digital Communications Officer shall issue monthly error reports to Accessible Document Liaisons to remediate any accessibility errors identified. The Digital Communications Officer will work with the



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Legislative Specialist to report to Senior Management on overall compliance with this policy.

- 4.6. **Accessibility Coordinator:** to oversee the implementation of this policy, provide training and support to Accessible Document Liaisons and other staff, and work with the Digital Communications Officer to monitor and report on compliance.
- 4.7. **Authors of Council & Committee Reports, Presentations, and By-laws:** Legislative Services is responsible for time-sensitive posting and circulation of Committee/Council agenda packages to the website, including reports and attachments, as well as maintaining Commonly Requested Bylaws page on the Town’s website. All staff creating content for inclusion in a Committee/Council Agenda Package and/or By-law are responsible for doing so in an accessible PDF format that has incorporated the required Town of Ajax Accessible Document Standards and been reviewed using applicable accessibility checks.
- 4.8. **Third-Party Authors/Creators:** Documents and content provided by third-party vendors, suppliers, and/or partners, must be provided in accessible formats, and adhere to the Accessible Document Standards. Adherence to the Town of Ajax Accessible Document Standards will be a requirement within contract specifications and staff involved in purchasing and procurement processes shall ensure that the Town’s Accessible Documents Standards are provided to ensure compliance.

5. Procedure

- 5.1. The Town of Ajax Accessible Document Standards Guide identifies the requirements for creating accessible documents.
- 5.2. Microsoft Accessibility Checker and Adobe Accessibility Tool are to be utilized to review accessibility features of documents prior to online posting and/or public release.
- 5.3. Where applicable, Document Creators are to utilize approved accessible document templates available in the Document Management System [Folder path: Town of Ajax > Reports, Templates, Logos > Corporate Templates], and to adhere to the Town of Ajax Accessible Documents Standards on the OLA SharePoint intranet site.

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5.4. All employees, volunteers, elected officials, and third-party contractors who are conducting business on behalf of the Town must ensure that information is formatted to comply with the Town of Ajax Accessible Document Standards Guide to incorporate requirements, including but not limited to:

- Complete document properties
- Use proper heading styles
- Automatic paragraph and spacing tools
- Proper table of contents formatting
- Automatic page numbering
- Clarity, organization, plain language, and readability
- Appropriate font family
- Appropriate font size
- No italics or underlining for emphasis
- No sentences with all upper-case letters
- Define acronyms
- Proper date format
- Sufficient colour contrast
- Align text and images to the left
- Alt text on images
- Use hyperlinks that convey meaning
- Proper formatting for tables and charts
- Automatic lists
- Avoid SmartArt
- Perform manual and built-in accessibility checks

5.5. The Document Creator will forward the accessible version to their Accessible Document Liaison for final review prior to online posting/printing.

5.6. When creating a PDF from a source document, staff and Accessible Document Liaisons shall perform the full Adobe Accessibility Check to examine and remediate elements within the PDF, where possible, including but not limited to:

- Correct reading order
- Tag structure
- Document title
- Language setting
- Bookmarks

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- Searchable text
- Alternative text for images and tables
- At least one Heading 1
- Appropriate use of heading styles order

5.7. Where accessibility errors are identified by the Accessible Document Liaison, they will work with the Document Creator to remediate such errors, in consultation with the Legislative Specialist, as necessary.

5.8. **Alternative Format Requests:** When a document is requested in an alternative format, it shall be the responsibility of the **originating department or section** to provide the alternative format, in consultation with the Accessibility Coordinator.

6. Exceptions

6.1. Staff may not be able to ensure that all online documents are accessible due to technology limitations, time constraints, or third-party sources, as described below. Certain conditions may warrant an exception to the Policy and Procedure. Exceptions to this policy will be determined on a case-by-case basis in consultation with the Legislative Specialist and Accessible Document Liaison.

6.1.1. If an Accessible Document Liaison is presented with a document for which staff are seeking an exception to the policy, they shall share a copy of the document with the Legislative Specialist and identify why an exception is requested.

6.1.2. The Legislative Specialist will review the document in consultation with the Accessible Document Liaison and determine whether additional remediation assistance can be provided or if an exception is warranted pursuant to Sec. 6.2.

6.2. Exceptions to this policy may be approved for limited circumstances including:

6.2.1. **Technology Limitations:** On occasion there may be instances when a document is not convertible to an accessible format or staff may not be able to ensure that online documents are accessible due to technology limitations. Examples may include:

- maps or Geographic Information System (GIS) data;

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- complex financial statements;
- engineering drawings or complex technical data; and
- legacy applications or data that cannot be updated or cannot be updated without reasonable effort/expense

6.2.2. **Time Constraints:** There may be cases where there are time constraints requiring a document to be posted online and the document posted to the website is not fully accessible.

6.2.3. **Complex Documents:** There may be examples of complex documents that contain numerous charts, maps, figures, and/or tables, which change dynamically.

6.2.4. **Third-Party Source:** Documents and content provided by third-party vendors, suppliers, and/or partners, must be provided in accessible formats, and pass the Adobe Full Check/Accessibility Check.

6.2.4.1. Every effort shall be made to ensure that third party vendors supply the Town with accessible documents as part of the contractual relationship between the Town and third party, however there may be cases where this is not possible (e.g. planning studies, audit reports).

6.2.4.2. Where the Town does not have a contractual relationship with the Document Creator or direct control over the content or creation of the document, staff are not required to convert it into an accessible format prior to it being posted on the Town's website. Examples could include external correspondence or documents created by the provincial or federal government. Whenever possible, staff are encouraged to link to third-party content, rather than hosting it directly on the Town's website.

6.2.5. **Exception Decision**

6.2.5.1. If an exception is granted, the **Alternative Format Notice** (Section 3.5) shall be applied to the documents during the timeframe wherein the documents are posted online and not accessible; and

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6.2.5.2. For exceptions granted under **6.2.2 Time Constraints**, efforts shall be made by the Document Creator and/or Accessible Document Liaison to post an accessible version of the document within 10 business days of the approval of an exception.

7. Compliance Monitoring and Reporting

- 7.1. The Digital Communications Officer will circulate a monthly report of non-compliant accessible documents posted online to applicable departmental Accessible Document Liaisons for remediation. A copy will also be sent to the Legislative Specialist.
- 7.2. Non-compliant documents identified as part of the compliance monitoring process will require remediation, where possible, and reposting within 10 business days.
- 7.3. The Legislative Specialist will meet quarterly, at a minimum, with Accessible Document Liaisons to discuss the compliance reporting process, challenges, available resources, and supports.
- 7.4. The Legislative Specialist and Digital Communications Officer will report to Senior Management on the implementation and compliance of this policy annually, at minimum.

8. Review and Revision

- 8.1. This policy and procedure will be reviewed annually and updated as needed to reflect changes in accessibility standards and best practices.

9. Related Resources

- 9.1. **Town of Ajax Accessible Document Standards Guide**
- 9.2. **Corporate and Departmental Templates**
- 9.3. [Adobe Help: Create and verify PDF Accessibility](#)

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9.4. Accessibility Tools for Word: Create Inclusive Word Documents:

- 9.4.1. [Intro to making documents accessible](#)
- 9.4.2. [Make your Word documents accessible to people with disabilities](#)
- 9.4.3. [Improve accessibility with the Accessibility Checker](#)