



## Accessibility Measures – Update Report

Item 8

September 21, 2023

Governance, Communications and Human Resources Committee

**Report:** GCHRC:2023-15

**To:** Governance, Communications and Human Resources Committee (“GCHRC”)

**From:** General Counsel & Corporate Secretary,  
Vice President, Strategic Planning & Communications, and  
Chief People & Culture Officer

**Date:** September 6, 2023

### **PURPOSE:**

The purpose of this report is to provide the Governance, Communications and Human Resources Committee (“GCHRC”) with an update on TCHC’s efforts to ensure all documentation posted to the public website is accessible and in compliance with the *Accessibility for Ontarians with Disabilities Act* (“AODA”).

### **RECOMMENDATION:**

It is recommended that the GCHRC receive this report for information.

### **REASONS FOR RECOMMENDATION:**

#### **Decision History:**

At its January 30, 2023 meeting, the GCHRC requested that TCHC management examine and report back regarding how to facilitate returning documents to TCHC’s website in a manner compliant with the *Accessibility for Ontarians with Disabilities Act* (“AODA”).

[Action Item related to Report GCHRC:2023-05  
GCHRC Meeting of January 30, 2023](#)

At its April 11, 2023 meeting, the GCHRC approved the staff recommendation to take the following approach to the treatment of PDF Board and Committee materials on TCHC's website:

1. Restore to the TCHC website all available Public meeting materials related to the period from January 2004 to December 2011, accompanied by a message that the materials may not appear in an accessible format and that, if individuals require the documents to be made accessible, TCHC will accommodate requests within 5 business days with the exception of complex documents;
2. Remove non-compliant Public meeting materials in PDF format related to the period from January 2012 to December 2020 as part of the final transition to TCHC's new corporate website;
3. Publish *Accessibility for Ontarians with Disabilities Act* ("AODA") compliant meeting agendas and minutes related to Public meetings of TCHC's Board and Committees for the period from January 2012 to December 2020, enabling the public to access high-level information on the items covered and decisions made at Board or Committee meetings between 2012-2020;
4. Make reports to the Board and its Committees related to Public meetings of TCHC's Board and Committees for the period from January 2012 to December 2020 available, in accessible format, to members of the public upon request;
5. Ensure that all PDF documents posted online, related to the period from January 2021 to present, are remediated and require TCHC business units to submit future Board reports in an AODA compliant format; and
6. Authorize the Vice President, Strategic Planning & Communications and the General Counsel and Corporate Secretary, and/or their respective designates, to take all actions and execute all necessary documents to implement the above recommendations.

[Report GCHRC:2023-15](#)  
[GCHRC Meeting of April 11, 2023](#)

## Update:

### Digital and Website Accessibility Initiatives

The Digital Communications team led the re-development of the Toronto Community Housing public website beginning in November 2023. One of the primary goals of the re-development was to achieve compliance with Web Content Accessibility Guidelines (WCAG) 2.1 Level AA standards. Following a detailed accessibility review of the new Toronto Community Housing website (launched May 2023), [torontohousing.ca](http://torontohousing.ca), using a combination of automated and manual tests, we found that the new website complies with the Web Accessibility Initiative (WAI) Web Content Accessibility Guidelines (WCAG) 2.1 Level AA. TCHC actively engaged tenants in the development, testing and review of the new website with a detailed review of accessibility as it pertains to design, user experience and navigation and content.

The PDF library on the website has undergone accessibility remediation over the past year and TCHC has contracted a vendor (Allayant) to continue checks and remediation of all the PDF documents in the library. Currently, TCHC is continuing to convert PDF's to HTML web pages to ensure greater accessibility for these documents and materials. This work to update our current PDF library will be completed before December 2023.

An ongoing sustainability plan to ensure continued digital AODA compliance has been put in place. A new website governance tool has been implemented on the public website. This tool will detect any accessibility issues on the site for remediation. This ongoing technology support will ensure that as new content is added and created, it will continue to remain compliant. TCHC will also be procuring ongoing vendor support to remediate PDF documents to ensure that these materials are accessible as they are published

### Training

To assist with TCHC's efforts to ensure that all documentation posted to the public website is compliant with AODA legislation, 61 staff from across the organization who are directly and indirectly involved in the preparation of Board and Committee meeting materials participated in 'Essentials of Creating Accessible Documents' training offered by the City of Toronto. The training walked staff through:

- Accessibility, its laws and standards;
- How to create accessible Word documents; and
- How to create accessible PDF documents.

On a go-forward basis, staff who submit Board and Committee reports to the Governance department will be required to confirm that they have performed and passed an accessibility check on their report in Microsoft (e.g. Word, PowerPoint, Excel), and Governance staff will perform a secondary accessibility check in Adobe prior to posting materials to the public website.

Governance staff are also scheduled to participate in further Adobe document remediation training, which is in addition to the training provided by the City of Toronto, to support AODA compliance of all Board and Committee materials posted to the external website.

#### Additional Accessibility Training for TCHC Staff

TCHC launched the 2023 *Accessibility for Ontarians with Disabilities Act* (“AODA”) fundamentals training program in August 2023.

Through extensive collaboration with key stakeholders across the organization, People and Culture (Learning and Organizational Development) developed a fundamentals program consisting of multiple interactive micro modules that focuses on essential components such as:

- AODA legislation
- Customer service accessibility
- Interacting with people with disabilities

Each micro-module ranges from seven to 15 minutes in length and can be accessed through Talent Connect (TCHC’s Learning Management System) where staff can learn at their own pace. These modules are mandatory for all staff at TCHC to complete.

This program demonstrates our continued commitment to ensure that TCHC remains AODA compliant. These modules contain updated legislative requirements and scenarios that applies to our work at TCHC, and is part of our continued commitment to accommodating and ensuring accessibility to our tenants and staff.

In the coming months, the Learning and Organizational Development team will continue to work with key stakeholders and trusted business partners across the organization to develop a phase II of this program that will focus on further enhancing the application of AODA into our day-to-day work.

**IMPLICATIONS AND RISKS:**

As previously reported, the Ministry for Seniors and Accessibility oversees compliance with, and enforcement of, accessibility laws. If TCHC fails to meet the AODA WCAG 2.0 guideline, it may apply daily administrative penalties until TCHC becomes compliant to a maximum of \$100,000. Failure to comply will also result in reputational risk to the corporation.

**SIGNATURES:**

*“Darragh Meagher”*

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Darragh Meagher  
General Counsel & Corporate Secretary

*“Paula Knight”*

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Paula Knight  
Vice President, Strategic Planning and Communications

*“Barbara Shulman”*

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Barbara Shulman  
Chief People & Culture Officer