Accessible Information and Communication Standard Handbook

January 2024

This information is available in alternate formats on request.

Please contact the Manitoba Accessibility Office at MAO@gov.mb.ca or call 204-945-7613 or toll free at 1-800-282-8069, ext. 7613.

Legal Disclaimer

This handbook is not legal advice. It aims to assist organizations to understand the Accessible Information and Communication Standard Regulation. This handbook does not replace the content of the Accessible Information and Communication Standard Regulation or The Accessibility for Manitobans Act. If there is any conflict between this training resource and the regulation or the act, the latter two shall prevail.

Table of Contents

Accessible Information and Communication 1

It's the Law 2

Information and Communication Standard Requirements 3

Web Content Requirements 3

Requests for, and Notification of, Accessible Information 5

Alternate or Accessible Formats 6

Communication Supports 7

Feedback Process 7

The Human Rights Code 7

Training Requirements 8

Policy Documentation 9

Compliance 9

Some Quick Tips for Making Documents Accessible 9

Making Images Accessible 10

More Quick Tips 10

Information and Communication Tools and Resources 10

Contact Information 11

Accessible Information and Communication

Information and communication accessibility benefits everyone.

Nearly every Manitoban has a disability, knows someone with a disability, or will have a disability in the coming years.

There are many ways people access information and communication as a result of their differing abilities to see, hear and understand information or communicate with others. Presenting information in a variety of ways will improve communication for everyone.

Accessible information and communication such as websites, written and training materials benefit all audiences by making information clear, direct, and easy to understand.

Accessible information and communication is usable by a wide audience, including people with disabilities and those who use a variety of devices, software and hardware. Providing accessible information and communication is important to ensure that all people have equal access to your information.

Examples of persons who benefit from accessible information and communication include:

- people who have no vision or low vision: they may use screen readers or large print programs such as the ZoomText Magnifier/Reader
- people with learning disabilities, such as dyslexia: they may need a document in an audio format
- people with dexterity disabilities: they may use voice recognition software or a tracking ball and mouse instead of a computer keyboard
- people who are Deaf or hard of hearing: they may require information interpreted in American Sign Language (ASL)
- people with cognitive or intellectual disabilities: they may request documents in plain language

Creating accessible documents ensures they are easier to edit and use. For example, it is important to remove accessibility barriers in Microsoft Word documents so that information can reach a broad audience, such as people who use screen readers.

If you plan, format, and structure your information in an accessible way from the beginning, you will ensure the document can be converted into a variety of alternate formats in the future (e.g., PDF, Rich Text Format or braille).

Organizations need to consider the ways in which Manitobans interact with or access information they provide. If you receive a request for information in another way:

- consult with the person making the request to identify a support or a format that removes the barrier.
- provide the format in a timely manner.

- do not charge the person making the request more than what you would charge to someone who did not make the request.
- Note: exceptions may apply to certain requests.

It's the Law

The Accessibility for Manitobans Act (AMA), passed in 2013, requires organizations to comply with accessibility standards to create an inclusive and accessible Manitoba.

The Accessible Information and Communication Standard Regulation was enacted on May 1, 2022 and is the third standard to be regulated under the AMA. The standard:

- requires all organizations to offer materials in accessible formats, such as documents in Word instead of PDF or through communication supports such as American Sign Language.
- aims to remove and prevent barriers that exist digitally, in-print, or through interaction with technology or people
- adopts globally recognized web content accessibility guidelines as a minimum requirement
- applies to all organizations operating in Manitoba with one or more employees

Some sectors have more time than others to comply with the standard. The sector you work in will determine when you need to comply.

✓ May 1, 2023: Manitoba government

✓ May 1, 2024: Public sector organizations, including large municipalities, libraries and educational institutions

- public sector organizations include Crown corporations, health authorities, school divisions, Manitoba's 10 largest municipalities and government agencies, boards and commissions.
- libraries include municipal, regional and City of Winnipeg libraries. Libraries also include libraries within educational institutions.
- educational institutions include colleges, universities, adult learning centres, private vocational institutions, as well as public and independent schools.

✓ May 1, 2025 - Private sector, non-profit organizations, and small municipalities

- private sector organizations include businesses and organizations with one or more employees, such as shops, restaurants and professional services, as well as non-profit organizations.
- non-profit organizations include charities, churches, community organizations and member associations.

Information and Communication Standard Requirements

The Standard requires all organizations to remove barriers related to information and communication for people with disabilities by creating policies, measures and practices respecting accessible communication.

Requirements focus on the following areas:

1. Web content
2. The duty to notify (this means that organizations must provide notice that information, educational, and library materials are available through communication supports and alternative formats)
3. Responding to requests for accessible information and communication supports
4. Feedback process
5. Training
6. Policy documentation
7. Specific requirements for educational institutions and public libraries

Website and web application requirements are also based on four accessibility principles:

1. Perceivable (visible to senses)
2. Operable (interaction that a user can perform)
3. Understandable (informative and how to operate)
4. Robust (used widely as technology evolves)

Web Content Requirements

Web accessibility benefits everyone. This includes people using a slow internet connection or people with limited technological knowledge.

The Accessible Information and Communication Standard Regulation requires organizations to remove barriers for people with disabilities who use their websites and view their web content.

Internet (External) websites:

All organizations must ensure that their internet (external) websites and web content meet or exceed globally followed World Wide Web Consortium (W3C) Web Content Accessibility Guidelines (WCAG) 2.1 Level AA if the following applies:

- the web content is published on or after this standard comes into force
- the web content is required to access an organization’s goods and services

Intranet (Internal) websites:

The intranet (internal) sites of public sector organizations, large municipalities, educational

institutions and libraries sites must conform to WCAG 2.1 Level AA.

For more information, visit:

- W3C Introduction to Web Accessibility
- W3C Accessibility, Usability, and Inclusion
- W3C Web Accessibility Perspectives

What is the W3C / WCAG?

The World Wide Web Consortium (W3C) is an international community that develops open (free) standards to ensure the long-term growth of the Web.

Web Content Accessibility Guidelines (WCAG) are developed through the W3C process, in cooperation with individuals and organizations around the world. The goal is to provide a single shared standard for web content accessibility that meets the needs of individuals, organizations, and governments internationally.

Web Application Requirements

If an organization is launching or significantly refreshing a web application, it must meet WCAG 2.1 level AA standards, at minimum.

Web application is defined as a software application that is run on a web server and accessed by a user through a web browser (does not include mobile apps). Web applications, also called web apps, are programs that allow users to perform actions online. Many businesses use these programs to communicate with customers, sell products and improve work processes.

Significant refresh means an update to an existing web application that changes the functionality, user base or purpose of the application.

Five exceptions to accessible web requirements

There are exceptions included in the Standard. Organizations are not required to meet WCAG 2.1 Level AA standards for web content or web applications if one or more of the following situations apply:

1. it is not technically feasible to meet the required level.
2. the technology required to publish the web content or application is not readily available.
3. meeting the required level would result in demonstrable undue hardship to the organization.
4. the organization does not have direct control over the web content or web application.
5. the web content or web application relates to product labels or other product information.

Requests for, and Notification of, Accessible Information

Organizations must:

- notify and inform the public and employees that they can request information through a communication support or accessible format. This includes requests related to emergency procedures and public safety.
- ask what is needed; consult with the person making the request to identify a support or format that removes the barrier and provide it in a timely manner
- not charge the person making a request more than what would be charged to someone who did not make a request

Additional requirements that apply to Libraries:

- **resource procurement** – a library must consider accessibility needs of its users when procuring or purchasing library resources.
- **duty to notify and inform** - a library must take appropriate measures to inform its users of each library resource that is currently available through a communication support or accessible format and the types of supports or formats that are available with respect to that resource.

Exceptions to Providing Accessible Information and Accessible Library Resources

Similar to web exceptions, the same exceptions apply when providing a requested support or format:

1. it is not technically feasible to provide the library resource through a communication support or accessible format
2. the technology required to provide the library resource through a communication support or accessible format is not readily available
3. providing the library resource through a communication support or accessible format would result in undue hardship to the organization
4. the organization does not have direct control over the information or library resource.
5. The information or library resource relates to product labels or other product information/resource

Additional requirements that apply to Educational Institutions:

In addition to the obligations listed above, an educational institution must take appropriate measures to inform the following individuals that educational materials are available through a communication support or accessible format on request to:

- employees
- students

- applicants and prospective applicants
- parents and guardians of students, applicants and prospective applicants

If educational material cannot reasonably be provided through a communication support or accessible format, the educational institution must provide a **comparable** resource to the person who requested the support or format.

A comparable resource will provide the same information as the original educational material through an accessible support or format.

An educational institution must not impose an additional cost or fee on a person who requests that educational material be provided through a communication support or accessible format.

Exceptions do not apply for requests to educational institutions for educational materials, such as:

- textbooks
- supplementary learning resources
- reference books, workbooks and educational kits
- student records
- class, lesson, workshop or program descriptions, availability, scheduling, and requirements

Alternate or Accessible Formats

People with disabilities may use adaptive or assistive technology that require a certain format so the technology can access the information in a specific manner for the user. Alternate accessible formats, such as printed or electronic documents must be available in different ways, upon request to ensure everyone has equal access to the information.

Examples of Alternate or Accessible Formats include:

- large print
- electronic or digital documents which are formatted to be accessible for use with a screen reader
- braille
- writing in plain language
- text transcripts of visual and audio information, such as video transcript
- American Sign Language (ASL) and/or close captioned interpreted documents and videos

Communication Supports

Communication supports are ways for people who cannot access verbal or audio information to receive it visually or ways for people who are non-verbal to communicate with people who speak. For instance, people who do not understand verbal communication may be Deaf, Deafened, or Hard of Hearing.

Examples of communication supports include:

- sign language interpretation (ASL)
- video relay service (VRS)
- Deaf-Blind Accessibility Interpreters
- captioning or audio description
- notetaking
- reading the written information aloud to the person directly

Feedback Process

Organizations must have a process to receive and respond to feedback (including complaints) about accessible information and communication.

- the process must be appropriate to the circumstances and suitable for people with disabilities.
- organizations must document resulting actions and make that documentation available in the appropriate format, on request.

The Human Rights Code

The Accessible Information and Communication Standard complements Manitoba's Human Rights Code.

Although accessibility measures ensure that the requirements for providing accessible information and communication are in place, they do not rule out the possibility of discrimination as outlined in The Human Rights Code (Manitoba). The Human Rights Code takes priority over all other provincial laws and regulations.

Training Requirements

All organizations in Manitoba are required to provide training on The Accessible Information and Communication Standard Regulation to employees, agents or volunteers with the following duties:

- persons who communicate directly with the public or another Manitoba organization on behalf of the organization
- persons who maintain or develop the organization's web content
- persons who purchase or procure information technology or communication tools
- persons who develop or implement the organization's measures, policies and practices on accessible communication
- persons who are educators within an educational institution

Training content must include:

- how to identify, prevent and remove barriers to accessible communication
- how to provide information through a communication support or an accessible format
- a review of The Human Rights Code, The Accessibility for Manitobans Act and the standard

An organization must provide training to a person as soon as reasonably possible after that person is assigned the applicable duties. Also, ongoing training needs to be provided whenever an organization updates or changes its accessible communication policies, measures or practices.

Policy Documentation

The following organizations are required to document or write down their accessible information and communication policies, including an accessible communication training policy:

- Educational Institutions
- The Manitoba Government
- Libraries
- Organizations in the private, public and non-profit sectors with 50 or more employees

Compliance

Once the Standard is in force, Manitoba's Accessibility Compliance Secretariat will conduct audits of policies and other documents related to accessible information and communication. Reviews to determine compliance with accessible web content, web applications and training requirements will also take place. When these audits and reviews are conducted, the aim will be to provide organizations with constructive feedback, share information about the standard and, if applicable, issue concrete plans to achieve compliance. If this approach is ineffective, activities may be escalated to include sanctions, such as orders to comply and the levying of administrative monetary penalties.

Some Quick Tips for Making Documents Accessible

- Run the Accessibility Checker on Word documents and have Word versions available for easy changes
- Headings are helpful to navigate content
- Write in plain language
- Include the access offer statement on documents and websites; such as; "This information is available in alternate formats on request. Please contact _____."
- Use at least 12pt font size
- Use sans serif fonts (e.g., Verdana, Arial, Tahoma, Calibri, and Helvetica)
- Align content to the left – avoid "justify" and use "centre" sparingly
- Avoid all caps and italics; also, bold can be helpful when used sparingly to add emphasis
- Apply a high contrast background, such as black text on white background

Making Images Accessible

Create “alt tags” or alternate text, which are descriptions of images for people who use screen readers. To do this:

- right-click on an image
- select “Size and Position” or “Format Picture” from menu
- click “Alt Text” tab and add a short description about the image

More Quick Tips

- it is easier to think about accessibility before you start a project (i.e., during the planning stages) than attempting to build-in accessibility features later
- turn on captioning and accessibility options (e.g., call-in using phone) for virtual meetings, and webinars

Information and Communication Tools and Resources

Additional resources related to accessible information and communication are available on the related Manitoba Accessibility Office webpage.

Contact Information

Manitoba Accessibility Office (MAO)

If you have any questions or require this information in an alternate format, please contact the Manitoba Accessibility Office:

Manitoba Accessibility Office
630 - 240 Graham Avenue
Winnipeg, MB R3C 0J7
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Email: MAO@gov.mb.ca
Website: AccessibilityMB.ca

Accessibility Compliance Secretariat (ACS)

If you have any questions about compliance please contact the Accessibility Compliance Office:

Accessibility Compliance Secretariat
Second Floor – 114 Garry Street
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