



Board and Committee Meeting Materials on TCHC's Public Website

Item 6

May 18, 2021

Building Investment, Finance and Audit Committee

Report: BIFAC:2021-45

To: Building Investment, Finance and Audit Committee
("BIFAC")

From: General Counsel & Corporate Secretary and Vice
President, Strategic Planning & Communications

Date: April 12, 2021

PURPOSE:

The purpose of this report is to advise the BIFAC of Toronto Community Housing's ("TCHC") obligations under the *Accessibility for Ontarians with Disabilities Act* ("AODA") with respect to public websites and to seek the BIFAC's approval to proceed with the recommended approach to remediating TCHC's public website to comply with AODA standards.

RECOMMENDATIONS:

It is recommended that the BIFAC approve and direct staff to proceed with the following approach to remediate TCHC's public website:

1. With the exception of Board and Committee meeting agendas remove Board and Committee PDF meeting materials up to January 1, 2021 that are not compliant with AODA standards and retain non-compliant materials off-line;
2. Remediate Board and Committee PDF materials starting from January 1, 2021 to comply with AODA standards and allow materials to remain on the website;

3. Remediate all Board and Committee PDF agendas to comply with AODA standards and allow agendas to remain on the website; and
4. Authorize the appropriate staff to take the necessary actions to give effect to the above recommendations.

REASONS FOR RECOMMENDATIONS:

Background:

At its meetings of January 25, 2018, February 23, 2018 and April 30, 2018, the Board requested that staff make all Board and Committee public agendas, minutes and meeting materials from before 2016 available on TCHC's external website to be easily accessible to members of the public.

Beginning January 1, 2021, TCHC's public website and web content posted after January 1, 2012 must meet web content accessibility guidelines ("WCAG") by December 31, 2021. In order to comply with the deadline, TCHC has engaged a third party vendor to remediate TCHC's public website and web content to meet WCAG 2.0.

AODA does not discuss what content or documents a corporation may place on their website; the Act only provides that if a corporation uploads documents or content to its public website, it needs to be WCAG 2.0 compliant. Therefore, TCHC has the discretion to remove content from its public website.

In an effort to reduce the costs associated with remediating web content, TCHC has been working with relevant business units to remove old and outdated web content on the public website, and remediate remaining web content to ensure that they are WCAG 2.0 compliant.

Taking the approach outlined above to ensure compliance with AODA requirements allows for a cost effective solution to remediating Board and Committee web content. Board and Committee materials that are over one year old will be removed from the website, but will still remain available to the public upon request. Additionally, materials stored off-line will be provided in an accessible format upon request.

Irrespective of age, all board and committee meeting agendas will remain on the public website and will be remediated to comply with WCAG 2.0. The agendas will remain available on-line to assist the public in searching for the associated Board and Committee meeting materials that have been removed.

It is estimated that by utilizing the recommended approach, TCHC's website will be AODA compliant by the December 31, 2021 deadline.

The alternative approach would be to remediate all Board and Committee materials on the public website dating back to 2003 to comply with AODA requirements. This approach is not recommended as it is not cost effective and will require additional resources to implement. There are currently more than 10,000 PDF documents on TCHC's external website, approximately 80% of which are Board and Committee materials. Since the remediation of PDFs is a manual process, the amount of hours required to successfully remediate all ~8,000 files will be substantial and would cost upwards of \$500,000. Opting for the alternative approach would prevent TCHC from being able to meet the December 31, 2021 deadline, and would also risk TCHC incurring significant daily administrative penalties, up to a maximum of \$100,000.

Next steps:

Staff will begin the process to remediate Board and Committee materials on the external website in line with the direction approved by BIFAC through this report and in adherence to the AODA WCAG 2.0 guidelines.

IMPLICATIONS AND RISKS:

Legal and Financial Risk

The Ministry for Seniors and Accessibility (the "Ministry") oversees compliance with, and enforcement of, accessibility laws. If TCHC fails to meet the AODA WCAG 2.0 guideline by December 31, 2021, the Ministry 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.

SIGNATURE:

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