

# Sharp Clothing Company Digital Accessibility Policy

Effective Date: July 7, 2017

## Background

Why is a digital accessibility policy necessary?

The Sharp Clothing Company (the company), being based in Ontario, Canada, is required under the Accessibility for Ontarians with Disabilities Act (AODA 2005), to ensure its digital information is accessible to people with disabilities.

## Commitment

The Company is committed to improving and maintaining access to its digital information. First, as a social responsibility, to ensure no one is excluded from working at, or being a customer of the company. Second, in its efforts to expand its market coverage, the company will ensure its accessibility standards meet those for an international audience.

## Accessibility Committee

The Accessibility Committee (AC) will be made up of senior representatives and knowledgeable staff from each of the company's departments. The committee will meet quarterly, and when necessary to address significant accessibility related issues.

The AC will be led by the accessibility coordinator (i.e., the Accessibility Champion).

## SCOPE AND GOALS

The AC will be responsible for:

- Raising accessibility awareness
- Encouraging feedback to share problems and solutions
- Implementing quality-assurance procedures
- Handling legal matters related to accessibility
- Providing web and digital accessibility support
- Developing internal accessibility standards
- Representing the organization in public affairs related to accessibility

## AUTHORITY AND ENFORCEMENT

The AC will have the authority to make adjustments to current processes throughout the company to ensure that accessibility requirements are being met.

The AC will also have the authority to delay release of products to the public, if accessibility does not meet company accessibility standards.

The AC will have the authority to recommend dismissal of staff who are unwilling to follow or repeatedly disregard the company's accessibility standards or policies.

## SUPPORT

The accessibility coordinator will be the main point of contact for company staff, who have questions or concerns related to digital accessibility.

The accessibility coordinator will be the main point of contact for the public with digital accessibility-related enquiries.

The AC will maintain a digital accessibility knowledge base within the company's main website, which will be available for all staff.

In the Contact Us form on the company website, "accessibility" will be included as a reason for the contact among the other given options. When selected, enquiries will be sent directly to the accessibility coordinator. The accessibility coordinator will direct the enquiry to the appropriate person (if required) as soon as it is feasible to do so, or will respond as soon as possible, taking no longer than 24 hours to reply.

## Guidelines and Standards

The AC will be responsible for developing and maintaining a set of company digital accessibility guidelines. These guidelines will include:

- Website and Web Application Accessibility Guidelines
- Web Content Accessibility Guidelines
- Document Accessibility Guidelines
- Multimedia Accessibility Guidelines

## WEBSITE DEVELOPMENT

The company websites, or any website or application created after this policy is issued, shall meet WCAG Level AA requirements outlined in the company's Website and Web Application Accessibility Guidelines, except where it is unrealistic to do so or where undue hardship has been established.

Undue hardship will be determined by the AC in cases where the cost is excessive, where technology or an equivalent does not exist in an accessible form, where health or safety are at risk, and where external funding is unavailable to assist with excessive costs.

## WEBSITE CONTENT

All content added to the website after this policy is issued, shall meet WCAG Level AA requirements outlined in the company's Web Content Accessibility Guidelines.

## DOCUMENTS AND COMMUNICATIONS

All documents and communications authored after this policy is issued will meet the requirements of the company's Document Accessibility Guidelines.

## MULTIMEDIA

All multimedia produced by the company after this policy is issued, will have captions for video and transcripts for audio, as outlined in the company's Multimedia Accessibility Guidelines.

## THIRD-PARTY DIGITAL CONTENT

Where third-party documents, web content, or web applications are used after all effort has been made to obtain these in an accessible form, the company will not be responsible for their lack of accessibility, and the company will acknowledge this fact in a way that is accessible and easily discoverable by customers or employees.

## Hiring Equity and Employment Accommodation

The company will make an effort to hire qualified people with disabilities, and where candidate qualifications are comparable, favour the person with a disability.

The company will question candidates about digital accessibility related to the position for which the candidate is applying; and where candidates are comparable, the company will favour those with more accessibility knowledge.

The company will provide appropriate assistive technology or other accommodation for any employee making such a request and can demonstrate an associated disability.

The company will establish and maintain a full-time Accessibility Specialist position and, within one year of this policy being established, hire a person with digital accessibility expertise for the role of

accessibility coordinator or to act as a consultant, taking on the role of Accessibility Engineer within the company's IT group.

## Training and Awareness

The AC will develop and maintain a series of educational units on various aspects of digital accessibility, consisting of documents, videos, web-based training, and in-class workshops, that will be offered periodically to ensure staff are adequately trained on accessibility issues associated with their position. These units will include:

- Accessible Document Authoring
- How People with Disabilities Use the Web
- Basic Web Accessibility
- Advanced Web Accessibility with WAI-ARIA
- Web Accessibility Auditing
- Multimedia Captioning

The AC will also be responsible for creating and maintaining an accessibility statement to be linked prominently on the main website. The statement will describe the company's commitment to accessibility and outlines accessibility features available on the website to assist users navigating the site with assistive technology.

## Digital Accessibility Resources

The AC will establish and maintain the company's accessibility knowledge base, which will contain a variety of resources including:

- The company accessibility guidelines
- Documentation on web and document accessibility methods
- Instructional videos on digital accessibility
- Annual accessibility reports
- Templates for Requests for Proposals (RFP) and contract accessibility wording
- Promotional items to highlight company accessibility efforts

## Procurement

All Requests for Proposals (RFP) involving digital content or products will include wording that requests details regarding a product's accessibility. Accessibility will be prioritized when judging proposals, so that lack of accessibility is likely to disqualify or significantly disadvantage a vendor.

Contracts with vendors will include language that commits the vendor to supplying products at an agreed-upon level of accessibility. Vendors will be obligated to address accessibility issues not previously acknowledged and/or dismissed.

Purchasing will acquire products and service that are the most accessible, except in cases where there is not a satisfactory or comparable product with a given set of features or functionality that provides accessibility.

The AC will prepare templates for RFP and contract language and maintain them through the company's accessibility knowledge base.

## Accessibility Auditing and Quality Assurance

Accessibility quality assurance will be added to and maintained throughout the company's processes. Before digital content is distributed publicly, it must be reviewed by someone other than the author who is familiar with the accessibility elements that the type of content being reviewed entails. This will include all documents, content posted to the websites, and promotional materials distributed to the public.

In the case of website development, the author's code will be reviewed by another knowledgeable IT staff member; and, before the development is made available to the public, it will be reviewed by the accessibility coordinator. Where the accessibility coordinator identifies issues, those issues must be corrected on the recommendation of the accessibility coordinator.

## Monitoring and Periodic Reviews

The accessibility coordinator will be responsible for conducting periodic spot checks on digital content and for conducting annual accessibility audits on the company's websites.

Any issues identified during checks and audits will be directed to those responsible for the content in question, who will be required to address the issues as instructed by the accessibility coordinator.

In cases where checks fail consistently, the accessibility coordinator will arrange additional training for the employee(s) responsible for the failures.

## Reporting

Following the annual audit of the company's websites, the accessibility coordinator, with the assistance of the AC, will produce a formal report on the accessibility status of the company's websites. The status report will be presented at the next quarterly senior management meeting and archived in the accessibility knowledge base.

## Policy Review

This policy will be reviewed annually by the AC and adjustments made where necessary. If modified, the policy will be approved by the company's senior director within 30 days of the update.

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