



**Library and Archives Canada**

**Directive on Web Accessibility**



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# Directive on Web Accessibility

## 1. Effective date

This directive has been approved by Library and Archives Canada's (LAC) Management Board and takes effect on 11 October 2016.

## 2. Application

This directive applies to all LAC's external Web sites that are not:

- Extranets;
- Archived Web pages;
- Third-party social media platforms; and
- Web sites featuring non-governmental information that are managed by LAC on behalf of other organizations resulting from collaboration agreements.

## 3. Definitions

See [Appendix A](#).

## 4. Context

LAC is mandated to acquire, preserve, and make known Canada's documentary heritage for the benefit of present and future generations. Increasingly, LAC clients are using the Web as the means of searching, discovering, and accessing our collections. While the Internet enables LAC to decrease geographical barriers and reach a significant number of clients, at the same time the Web presents a set of unique technological barriers, particularly for clients with perceptual disabilities.

As a Government of Canada institution, LAC is committed to providing access to its collection for Canadians without discrimination and to facilitate access for anyone with an interest in Canada. As such, and short of undue hardship, LAC is committed to fulfilling its duty to accommodate clients with perceptual disabilities, including those with blindness and low vision, deafness and hearing loss, learning disabilities, cognitive limitations, limited movement, speech disabilities, photosensitivity, and combinations of these. This *Directive on Web Accessibility*, which falls under LAC's *Access Policy Framework (2016)*, sets out how LAC fulfills this responsibility when providing Web-based access to holdings and contextual information about holdings.

Several legal and policy instruments provide LAC's Web accessibility obligations, including the [Canadian Charter of Rights and Freedoms](#), the [Canadian Human Rights Act](#), Treasury Board Secretariat's (TBS) [Policy on Communications and Federal Identity](#), and the TBS [Standard on Web Accessibility](#) as well as other related

documents listed in [Appendix B](#). The standardized application of applicable legislation and policy to federal government websites is facilitated by the common use of the Canada.ca platform.

Given that LAC is exempt from migrating documentary heritage, metadata, and supporting services to the Canada.ca platform ([Appendix C](#)), the current directive describes how LAC will meet Web accessibility standards obligations on LAC's Web sites. While the *Policy on Communications and Federal Identity* states that LAC is responsible only for the content it creates, LAC aims to provide Web access to as much as possible of the documentary heritage collection held in trust for Canadians, despite not being the creator of the material.

LAC's approach to making its Web sites accessible is informed by the Federal Court decision in [Jodhan v. Canada](#), wherein the court determined that "reasonable accommodation" requires that an institution take positive steps to ensure that disadvantaged groups benefit equally from services, up to the point of "undue hardship". The court further determined that technical feasibility and total expense are taken into account when testing reasonable accommodation and assessing degree of hardship.

The size and diversity of LAC's documentary heritage collection raise both financial and technical challenges, nevertheless, LAC makes its best effort to provide its holdings in an accessible format. Moreover, moving forward, LAC is committed to including Web accessibility considerations when digitizing holdings, including in crowdsourcing.

## **5. Purpose**

The purpose of this *Directive on Web Accessibility* is to define how LAC applies the TBS *Standard on Web Accessibility* to the content of its external Web sites.

## **6. Requirements**

All static and non-static content on LAC's Web sites are made Web accessible for persons with perceptual disabilities according to the requirements of the TBS *Standard on Web Accessibility*, with the exception of:

- Digital copies of holdings not used for promotional purposes; and
- Descriptive metadata held in LAC's databases, such as AMICUS and MIKAN, whether it was generated by LAC or by a third party.

In the event that persons with perceptual disabilities request digital copies of holdings and/or access to descriptive metadata on LAC's external Web sites, LAC will:

- Provide digital and/or analog copies in an alternative format upon request; and,
- Only as a last resort, direct clients to third-party tools or fee-based third-party services (e.g., Optical Character Recognition software, captioning, video description).

## **7. Roles and Responsibilities**

Web accessibility is a shared responsibility across LAC. More specifically:

- 7.1. The Director General, Communications Branch is responsible for applying this directive to static content on Web pages. As LAC's Senior Departmental Official, the Director General of Communications is also responsible for reporting to TBS on behalf of LAC and for developing and promoting tools to render holdings Web accessible.
- 7.2. The Director General, Innovation and Chief Information Officer Branch is responsible for applying this directive to dynamic content on Web pages.
- 7.3. The Director General, Public Services Branch is responsible for generating accessible content and for providing it to the Directors General, Communications Branch and Innovation and Chief Information Officer Branch, when relevant.
- 7.4. The remaining Directors General have a responsibility to raise awareness on accessibility requirements with managers and employees.
- 7.5. When generating content for Web sites, managers and employees are responsible for using accessibility tools as promoted by the Communications Branch.

## **8. Monitoring, evaluation and review**

The Director General, Communications Branch monitors and analyzes the implementation of the directive to evaluate the progress, effectiveness, attainment of objectives and outcomes, and potential improvements.

The Director, Strategic Research and Policy will review the directive in five years or as required.

## **9. Consequences**

In support of this directive, managers will ensure corrective actions are taken to address instances of non-compliance with its requirements. Corrective actions may include training, changes to procedures and systems, and other measures and may include any actions deemed appropriate and acceptable in the circumstances.

## **10. Information**

Please address any questions about this directive to:

Director, Strategic Research and Policy  
Library and Archives Canada  
550 de la Cité Boulevard  
Gatineau, Québec  
K1A 0N4  
Email: [bac.politiques-policy.lac@canada.ca](mailto:bac.politiques-policy.lac@canada.ca)

## **Appendix A: Definitions**

### **Archived Web Page [*Page Web archivée*]**

A Web page for which LAC is accountable, that is clearly identified as being archived and is:

- maintained for reference, research or recordkeeping purposes;
- not altered or updated after the date of archiving; and
- stored in a digital repository (TBS [Guidance on Implementing the Standard on Web Accessibility](#)).

### **Dynamic Web Page [*Page Web dynamique*]**

Web pages that feature unfixed content drawn from a database using an application (e.g. search engine).

### **Extranet [*Extranet*]**

An intranet system or private network created by an organization to share information, wholly or partially, with authorized third-party users outside the organization (TBS Glossary) (e.g. [LAC Direct](#), Record Keeping (RK) Portal).

### **Holdings [*Collection*]**

All documentary heritage brought under the control of LAC through the *Library and Archives of Canada Act* and *Legal Deposit of Publications Regulations*, and any master copies generated thereof (*LAC Policy on Holdings Management*).

### **LAC External Web Sites [*Sites Web externes de BAC*]**

Web sites that represent LAC and for which LAC is accountable and can be discovered by Canadians through the following domain name: [www.bac-lac.gc.ca](http://www.bac-lac.gc.ca) or [www.collectionscanada.gc.ca](http://www.collectionscanada.gc.ca). It excludes the <http://intranet.lac-bac.gc.ca/>, which is only discoverable to LAC employees, as well as extranets and social media platforms.

### **Promotional Purposes [*Fins promotionnelles*]**

When holdings are used to increase LAC's visibility or to communicate to external clients, users and partners LAC's mandate, activities or services.

### **Static Web Pages [*Pages Web statiques*]**

Web pages that display fixed, unchanging Web content, discoverable to all users as uploaded by LAC.

**Web Accessibility [*Accessibilité Web*]**

Accessibility means equitable access to all content on LAC's external Web sites. For practical purposes, accessibility refers to the extent to which Web content can be obtained and effectively used by the widest possible audience, particularly those with disabilities (TBS Glossary).

## **Appendix B: Related Documents**

[Access Policy Framework](#)

[Canadian Human Rights Act](#)

[Canadian Charter of Rights and Freedoms](#)

[Policy on Communications and Federal Identity](#)

[Convention on the Rights of Persons with Disabilities](#)

[Copyright Act](#)

[Jodhan v. Canada Federal Court Decision](#)

[Legal Deposit of Publications Regulations](#)

[Library and Archives of Canada Act](#)

[Marrakesh Treaty to Facilitate Access to Published Works for Persons Who Are Blind,](#)

[Visually Impaired or Otherwise Print Disabled](#)

[Standard on Web Accessibility](#)

[Web Content Accessibility Guidelines 2.0](#)



## Appendix C: Exemption from the Web Renewal Initiative



Treasury Board of Canada    Secrétariat du Conseil du Trésor  
Secretariat                      du Canada

Ottawa, Canada  
K1A 0R5

MAR 12 2015

Mr. Paul N. Wagner  
Senior Director General Innovation & CIO  
Library and Archives Canada  
550 de la Cité Boulevard  
Gatineau, QC K1A 0N4

Dear Mr. Wagner:

This letter serves to confirm that the collection of records comprising the Documentary Heritage of Canada and associated services are exempt for migration to the technical platform supporting the new Canada.ca Web site.

This exemption applies to the systems that support the publishing of collection content, however:

- a) This content must present within Canada.ca templates.
- b) All other active content currently published to <http://www.bac-lac.gc.ca> will be supported by the Canada.ca Managed Web Service and presented within Canada.ca templates.

Moreover it is expected that LAC will send its Institutional Profile information to the Web Renewal Team in a timely manner to meet the deadline of March 31, 2015.

We appreciate your ongoing support to the Web Renewal Initiative and will continue to collaborate with you as we continue the rollout of this initiative.

Sincerely,

Corinne Charette  
Chief Information Officer  
of the Government of Canada

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