

# Accessible Information & Communication Policy (ICM)

Effective: May 1, 2024

The International College of Manitoba (ICM) is committed to establishing and maintaining an environment that is inclusive and takes into consideration the needs of all its community members. In adherence to the [Accessibility for Manitobans Act](#) and Manitoba's **Human Rights Code**, ICM is committed to ensuring that our policies, practices, and environment (both physical and virtual) reflect our commitment to providing an accessible and welcoming space for members of our community as well as members of the University of Manitoba (UM) and Winnipeg communities inclusively.

ICM prioritizes the health and wellbeing of its community members and will strive to ensure that the experience of those who engage with us is one that reflects our commitment to equity, diversity, and inclusion. If there is a policy or practice that creates a barrier for any individual, ICM commits to ensuring that appropriate accommodations are made available to guarantee that the individual can still access services.

The most current Accessible Information & Communication Policy document is published on the ICM website and is available in alternate formats upon request. ICM will ensure that the documentation or the information contained in it is given to the person in a manner that considers the barrier and within a reasonable time and at no cost to the person.

## SCOPE

This policy applies to all members of ICM staff including full-time, part-time, casual, sessional, and seasonal employees.

## POLICY CONTENT

This policy outlines the actions taken to ensure that members of the ICM community's needs are met when accessing information and communications. It ensures that barriers that exist digitally, in-print, or through interaction with technology or people are prevented and removed. To best align with language used by the Province of Manitoba's [Accessibility Standard for Information & Communication](#), many of the definitions below and passages throughout this policy and its associated procedure align directly with those of the Standard (2024).

## DEFINITIONS

The following are terms used in this Policy:

- a.) Accessible Communication- Communication of information in a manner that is free from barriers that prevent or hinder a person from obtaining, using or benefiting from the information.
- b.) Accessible Format- Includes large print, recorded audio and electronic formats, braille and other formats usable by persons with disabilities.
- c.) Barriers- Anything that interacts with a disability in a way that affects a person's full and effective participation in everyday life, including, but not limited to, attitudinal, information/communication, architectural/ environmental, technological, or systemic barriers.
- d.) Communication- Transfer of information between two or more persons or entities or any combination of them.
- e.) Communication Support- Includes captioning, alternative and augmentative communication supports, plain language, sign language and other supports that facilitate effective communication.
- f.) Disability- A person with a disability is a person who experiences mental, cognitive, physical, or sensory impairment that may require accommodation (2015).
- g.) Educational Materials- Means:
  - a. Textbooks
  - b. Supplementary learning resources, including reference books, workbooks, and educational kits
  - c. Student records
  - d. Class, lesson, workshop, or program
    - i. Descriptions,
    - ii. Availability,
    - iii. Scheduling, and
    - iv. Requirement.
- h.) Information- Data, facts, or knowledge that is written, photographed, recorded or stored in any manner.
- i.) Significant Update- An update to an existing web application that changes the web application's functionality, user base, or purpose.
- j.) Undue Hardship- When accommodations go beyond what is within the duty to accommodate. When determining if an accommodation will cause undue hardship, several factors including health and safety risk, disruption to a contract, financial costs, business efficiency, and impact on service providers and members of the ICM community (Government of Manitoba).
- k.) WCAG 2.1 Level AA- The World Wide Web Consortium Web Content Accessibility Guidelines 2.1 Level AA.
- l.) Web Application- Software application that is run on a web server and access by a user through a web browser.

- m.) Web Content- Information that is published on:
- a. the Internet website of ICM ([www.icmanitoba.ca](http://www.icmanitoba.ca))
  - b. the intranet website of an organization (including but not limited to <https://learning.icmanitoba.ca>).

### ***Web Content***

The College's web content and applications meet or exceed the standards set out in WCAG 2.1 Level AA if one or more of the following applies:

- The web content/application is published on or after May 1, 2024
- The web content/application receives a significant update on or after May 1, 2024
- The web content/application is required to access the College's goods and services.

The College will not be required to meet the standards set out in WCAG 2.1 Level AA if one or more of the following applies:

- It is not technically feasible to publish the web content/application in accordance with WCAG 2.1 Level AA
- The technology required to publish the web content/application in accordance with WCAG 2.1 Level AA is not readily available
- Publishing the web content/application in accordance with WCAG 2.1 Level AA would result in undue hardship to the College
- The College does not have direct control over the web content/application
- The web content/application relates to product labels or other product information.

### ***Duty to Notify***

ICM will take appropriate measures to inform the public, its employees, its students, its applicants/prospective applicants, and parents and guardians of students/applicants/prospective applicants that on request the College will provide information through a communication support or accessible format.

### ***Requesting Accessible Information***

A person may request that the College provide information, including information related to emergency procedures or public safety, through a communication support or accessible format.

The College will not be required to provide the information through a communication support or accessible format if one or more of the following applies:

- It is not technically feasible to provide the information through a communication support or accessible format
- The technology required to provide the information through a

- communication support or accessible format is not readily available
- Providing the information through a communication support or accessible format would result in undue hardship to the College
- The College does not have direct control over the information
- The information relates to product labels or other product information.

The College will not impose a cost or fee on the person who requests that information be provided through a communication support or accessible format that is greater than the cost or fee that would be imposed on a person who did not make the request.

### ***Accessible Educational Materials***

The College will take appropriate measures to inform the following individuals that educational materials are available through a communication support or accessible format upon request:

- Employees
- Students
- Applicants and prospective applicants
- Parents and guardians of students, applicants, and prospective applicants.

A person may request the College to provide educational material through a communication support or accessible format, such as large print, electronic or digital documents, text transcripts of visual or audio information, or alternate formats.

The College will not impose a cost or fee on the person who requests that education material be provided through a communication support or accessible format that is greater than the cost or fee that would be imposed on a person who did not make the request.

### ***Training***

We will ensure that training on accessible information and communications policies and practices is provided to:

- A person who communicates directly to the public or to another organization in Manitoba on behalf of the organization, including employees, agents and volunteers
- A person who is an educator
- A person who develops or maintains the College's web content
- A person who purchases or procures information technology or communication tools
- A person who develops or implements the organization's measures, policies and practices respecting accessible communication.

Content of training will include:

- Instruction about how to identify, prevent, and remove barriers to accessible communication
- Instruction on how to provide information through a communication support or accessible format
- A review of *The Human Rights Code*, *The Accessibility for Manitobans Act*, and the *Accessible Information and Communication Standard Regulation*.

### ***Feedback Processes***

We welcome feedback on the accessibility of our information and communications, including but not limited to our measures, policies, and practices. Upon receipt of feedback about accessible information and communication, the College will respond in a manner that is appropriate in the circumstances and is suitable for the person(s) who are disabled by barriers. The College will document its resulting actions and make that documentation available upon request.

### ***Appeals***

If at any point a community member is dissatisfied with the provision of accessible information and communication, they have the right to appeal. A procedure to escalate unresolved matters is in place to ensure appeals are reviewed and responded to in a timely manner.

### **REVIEW**

Policy review shall be conducted every two (2) years. The next scheduled review date for this Policy is May 1, 2026.

# Accessible Information & Communication Procedure (ICM)

Effective: May 1, 2024

The International College of Manitoba (ICM) is committed to establishing and maintaining an environment that is inclusive and takes into consideration the needs of all its community members. In adherence to the [Accessibility for Manitobans Act](#) and Manitoba's **Human Rights Code**, ICM is committed to ensuring that our policies, practices, and environment (both physical and virtual) reflect our commitment to providing an accessible and welcoming space for members of our community as well as members of the University of Manitoba (UM) and Winnipeg communities inclusively.

ICM prioritizes the health and wellbeing of its community members and will strive to ensure that the experience of those who engage with us is one that reflects our commitment to equity, diversity, and inclusion. If there is a policy or practice that creates a barrier for any individual, ICM commits to ensuring that appropriate accommodations are made available to guarantee that the individual can still access services.

The most current Accessible Information & Communication Procedure document is published on the ICM website and is available in alternate formats upon request. ICM will ensure that the documentation or the information contained in it is given to the person in a manner that considers the barrier and within a reasonable time and at no cost to the person.

## SCOPE

This policy applies to all members of ICM staff including full-time, part-time, casual, sessional, and seasonal employees.

## PROCEDURE CONTENT

This procedure outlines the actions taken to ensure that members of the ICM community's needs are met when accessing information and communications. It ensures that barriers that exist digitally, in-print, or through interaction with technology or people are prevented and removed.

### **Web Content**

Content that is published, updated, or required for access to the College's goods and services will be developed to meet WCAG 2.1 Level AA standards, including, but not limited to:

- Text alternatives for non-text content
- Media alternatives (including text) for prerecorded audio or video media

- Captions are provided for all prerecorded audio or video content
- Captions are provided for live audio content
- Content is developed with intentional structure and meaningful sequence
- Colour is not used as the only means of conveying information or promoting action
- A colour contrast ratio of at least 4.5:1 (3:1 for large text)
- Ability to resize up to 200% without losing content or functionality
- Spacing conventions for text, including line height of 1.5 times the font size, spacing following paragraphs at least 2 times the font size, letter spacing at least 0.12 times the font size, and word spacing at least 0.16 times the font size
- All content functions properly with solely the use of a keyboard
- Webpages use intentional titles, headings, and labels to describe the content, topic, or purpose,
- Links are easily discernable based on its descriptor.

As part of routine Wellness Health & Safety physical site inspections, additional audits of web content, including both items from the Intranet and Internet, will be conducted to assess compliance with WCAG 2.1 Level AA standards. This will include manual checks, as well as running scans through an accessibility checker. All matters of non-compliance will be submitted for action with a specified timeline for resolution.

### ***Duty to Notify***

ICM includes a statement on its application form, websites, and all other information and communication publications that the College will provide, upon request, information through a communication support or accessible format.

### ***Requesting Accessible Information***

When a person requests that the College provide information, including information related to emergency procedures or public safety, through a communication support of accessible format, the College will consult with the person to identify the support or format that would remove the barrier and provide the information to the person through the identified support or format in a timely manner.

### ***Accessible Educational Materials***

A statement regarding educational materials being available through a communication support or accessible format upon request will be listed in all course outlines, in the Student Handbook, student application, and any other relevant venue.

Upon request for education material through a communication support or accessible



format, the College will consult with the person to identify the support or format that would remove the barrier and provide the educational material to the person in the identified support or format in a timely manner.

If educational material cannot reasonably be provided through a communication support or accessible format, the College will 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.

The College will not impose a cost or fee on the person who requests that education material be provided through a communication support or accessible format that is greater than the cost or fee that would be imposed on a person who did not make the request.

### ***Training***

ICM will ensure that all frontline staff are trained on [The Province of Manitoba's Accessible Information & Communication training](#) (or alternate and equivalent training). All frontline staff should complete the learning module within 30 days of this Policy/Procedure's launch, and all new staff should complete the learning module within the first 30 days of onboarding.

The Wellness Health and Safety Committee will collect certificates of completion from all staff and record completion to keep track of who has completed and who has yet to finish the training.

Training on creating accessible communication and information for course delivery will be provided to faculty, including training on how to use Learning Management System plugins/toolkits to best ensure accessibility of course materials, including identification and correction of accessibility errors. Faculty professional development training courses will adhere to accessibility standards, modeling best practices.

The ICM Professional Development (PD) working group will endeavour to host PD sessions throughout the year to increase awareness and understanding of best practices in creating accessible information and communication.

Those responsible for the content of the ICM websites will undergo training on WCAG 2.1 Level AA standards and requirements.

### ***Feedback Processes***

Community members who wish to provide feedback about accessible information and communication can do so by contacting the ICM office in the following ways:

- In person by visiting our office and discussing in person to our ICM



- front desk staff member.
- Contact us by phone at 1-204-474-8479, or by email at [reception@icmanitoba.ca](mailto:reception@icmanitoba.ca).
  - Alternative methods of providing feedback will be considered, based on individual need.

In the event that feedback requires follow-up, it will be determined who the appropriate individual or department is appointed to look into the matter. The person who has registered the feedback will be informed of who will be following up and be provided an expected date by which they can expect a response.

When responding back to the individual, we will ensure that the method used will meet the communication needs of the individual.

- If necessary, we will ensure that all members of the ICM community are made aware of any amendments or improvements of our accessibility services as a result of the feedback provided.
- ICM will document resulting actions and make that documentation available upon request, ensuring any personal information is anonymized for confidentiality purposes.

### ***Appeals***

If at any point a community member living with a disability is denied information and communications accommodations, they have the right to appeal. Appeals regarding the accessibility of information and communications can be directed to:

- For website related appeals – [info@icmanitoba.ca](mailto:info@icmanitoba.ca)
- For non-academic student services (including Student Portal) related appeals – Associate Director (Student Experience & Wellness)
- For course-related appeals – Associate Director (Academic & Student Success).

Appeals should include a statement on the desired resolution. Once the appeal has been received, it will be acknowledged in writing (or other preferred format) with an estimated time of resolution. The accommodation will be investigated and any additional information that is obtained during that time will be relayed to the community member who has filed the appeal.

### **REVIEW**

Policy review shall be conducted every two (2) years. The next scheduled review date for this Policy is May 1, 2026.

## References

Manitoba Accessibility Office (2024, January 26). *Accessible Information and Communication Standard Regulation* <https://accessibilitymb.ca/accessibility/act-standards/the-accessibility-standard-for-information-and-communication.html>

World Wide Web Consortium (W3C) (2024, March 28). *How to Meet WCAG (Quick Reference)* <https://www.w3.org/WAI/WCAG22/quickref/?versions=2.1&showtechniques=126#sign-language-prerecorded>