



Policy Management Framework Update

Item 11D

December 12, 2024

Board of Directors

Report: TCHC:2024-81

To: Board of Directors (the “Board”)

From: Governance, Communications and Human Resources Committee (“GCHRC”)

Date: November 12, 2024

PURPOSE:

To provide the Board with an update on the work undertaken to refresh the Policy Management Framework.

RECOMMENDATIONS:

It is recommended that the Board approve the updated Policy Management Framework as set out in Attachment 1 to this Report.

GCHRC:

The recommendation was approved by the GCHRC on November 12, 2024.

REASONS FOR RECOMMENDATIONS:

Policy Management Refresh Update

As reported to GCHRC at its April 11, 2023 meeting in [Report GCHRC:2023-16](#), TCHC undertook a refresh of the Policy Management Framework (“the Framework”). The Framework governs Board and Corporate policies within the organization including laying out the grounds for policy development, establishing criteria for each policy type, directing the regular review of existing policies, standardizing the policy process from development to approvals and identifying key roles and responsibilities for policies.

This refresh aims to establish a more efficient policy review model that mitigates risk, drives strategic direction, and establishes a more coherent, up-to-date, and manageable set of policies. TCHC has a large number of policies, most of which are overdue for review. Linkages between individual policies and connections to other factors such as shareholder direction, changing regulation and evolving strategic environment complicate the policy review process.

Key changes in the Framework includes:

- Update of the criteria for Board Policies to better align with Board responsibilities outlined in the Shareholder Direction.
- Commitment to annual reporting to the Board on the policy inventory, including the identification of corporate policies that have been updated.
- Adding interim policies as a formal policy category and removal of the divisional policy category from the Framework scope to better reflect the current state of the policy environment TCHC operates in.
- Separation of policy review from policy amendments so there is a clear process for approvals when policies don't need to be changed.
- Added requirement for an Equity, Diversity and Inclusion (EDI) and Confronting Anti-Black Racism (CABR) lens to be applied to all policies when being developed or updated.
- General update of document structure to improve readability.

To further support the ongoing review and development of policies additional structure has been put in place to support the work of staff. This includes:

- Developing a formalized five-year policy planning process which will align with future business planning processes.
- Establishing a cross departmental policy table that meets quarterly to lead and monitor policy work.
- Developing a policy writing toolkit to support policy writers across the organization.
- Developing an updated set of templates to provide policy owners with support in the policy development process. This includes revised policy and procedure templates, briefing note, and work planning templates

The table below is an update on the work items committed to in the Report GCHRC:2023-16.

Item #	Timeline	Progress Update
1. By Q4 2023, identify a set of recommended policies for priority review in 2024.	Q1 2024	<ul style="list-style-type: none"> • Complete: In Q1 2024 TCHC provided the list of policies for review to the GCHRC. • In Q1 2025, staff will report back on the status of the 2024 policies including an updated list of policies for development in 2025.
2. Complete a fulsome inventory of TCHC policies and identify areas of fragmented policy that warrant consolidation, and outdated policies that can be retired or replaced	Q1 2024 Q4 2024	<ul style="list-style-type: none"> • Complete: Met with business units to capture inventory of policies owned by divisions, identifying policies not captured in inventory. • In progress: Identify policies that can be retired or consolidated. Identify policies requiring a procedure. • In progress: Establish long-term systematic policy development and review schedule.
3. Document linkages between policies to support a more coherent and efficient review cycle going forward.	Q4 2024	<ul style="list-style-type: none"> • In progress: Policy inventory review to identify linkages between policies.
4. Review our current Policy Management Framework and update it to include realistic timelines and triggers for policy review that are in line with industry practice. This will also include updating our current policy and	Q3 2024	<ul style="list-style-type: none"> • Complete: A SWOT analysis of the current framework and a review of best practices for managing policies is underway.

Item #	Timeline	Progress Update
procedure templates, as well as looking for opportunities to add new templates for staff use (i.e. toolkits, guides, etc.).		
5. Prepare to resume regular policy reviews in 2024 in a manner that aligns with the strategic planning cycle and supports the objectives of the forthcoming strategic plan.	2024	<ul style="list-style-type: none"> ● Ongoing: Board level policies for review have been identified for 2024 and are underway.

2024 Policy Review Update and 2025 Policy Review Schedule

The list of policies requiring Board-approval to be updated or developed in 2024 was provided at the March 26th, 2024 GCHRC meeting ([Report GCHRC: 2024-09](#)). Policies for review were selected in keeping with the principles of the Policy Management Framework refresh, including date of last review, risk mitigation, impact on tenants, legislative or shareholder requirements, and alignment with strategic initiatives. An update on the status of these policies will be provided to the GCHRC in Q1 2025.

The list of policies to be reviewed or developed in 2025 as well as the five-year policy review schedule will also be provided to GCHRC in Q1 2025.

IMPLICATIONS AND RISKS:

The policy review schedule minimizes TCHC's exposure to reputational, financial and other risks through regular review and compliance monitoring.

Timely and thorough reviews of existing policies are necessary to ensure that they serve their intended purpose and remain compliant with applicable legislation. Reviews also provide an opportunity to apply up-to-date best practices, legislative changes, and to consider relevant Auditor General and Ombudsman findings and recommendations.

TCHC currently has a large number of policies, most of which are overdue for review. Successfully improving the policy review framework to establish more efficient policy reviews going forward will mitigate this risk and set the corporation up for a more coherent and sustainable model moving forward.

SIGNATURE:

“Ada Wong”

Ada Wong,
Acting Vice President, Strategic Planning and Communications

ATTACHMENT:

1. Policy Management Framework

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Policy Management Framework

Owner: Strategic Planning and Communications

Approval: Board of Directors

First Approved: [Month/Year]

Effective Date: [Month/Day/Year]

Introduction

The development and maintenance of policies is an important part of the governance of any organization. Policies are put in place to guide and direct the decisions and actions of staff in achieving corporate goals and objectives. The Policy Management Framework (the Framework) governs how policies and procedures at Toronto Community Housing (TCHC) are developed and approved. This Framework supports a consistent approach to policy management across the corporation by:

- Outlining the responsibilities of the Board of Directors (the Board) for policy approval;
- Explaining the reasons for the development of new policies or the amendment of current policies;
- Mandating regular reviews to ensure policies are current;
- Outlining the roles and responsibilities of all divisions involved in policy development and review;
- Explaining how the policy management process is centrally administered.

Scope

The Framework governs the development and management of Board and corporate policies and their related procedures.

Other governance instruments, including operational procedures, standard operating procedures, guidelines and programs are outside the scope of the Framework. These instruments help to operationalize policies or are

standalone documents which are tied to a business function and are maintained by their issuing business unit.

Policy vs. Procedure

Policy is a clear and high-level statement of intent and helps guide decisions and actions to achieve a desired outcome. Policies are the “what” and “why” we do things as a company. Policies are needed to:

- Protect the corporation legally;
- Keep the corporation in compliance with legislation;
- Establish consistent work standards, rules, and regulations; and
- Provide consistent and fair treatment for staff, tenants or others.

Procedures are a high-level series of steps that must be taken to accomplish the goals set out by a policy – it is the “how”. Procedures are needed to:

- Provide an overview of specific actions, steps, or instructions that staff must follow;
- Ensure consistent and comprehensive application of a policy;
- Allow for regular operational updates/revisions that do not require higher levels of approval; and
- Clearly demonstrate what to do at each step to ensure successful implementation.

NOTE: If it is unclear whether a policy is required or whether another governance instrument should be used to achieve a particular purpose, the Policy Owner should contact the Manager, Strategy for advice.

Board Responsibilities

As laid out in the Shareholder Direction, the Board is responsible for:

establishing policies and other directives consistent with this Shareholder Direction, Council directives or requests, the Housing Services Act and all applicable law, agreements, and best practices of corporate governance and financial and risk management.

To effectively carry out this duty, the Policy Management Framework outlines the criteria for determining which policies must be approved directly by the Board and its Committees and which policies can be delegated to management for approval. The approval of new or amended

corporate policies, at the management level, must be reported to the Board annually for information. In situations where the level of approval for a policy is unclear, the Chair of the committee with oversight of the policy area will provide direction to management on whether the policy needs to be approved at the Board.

Policy Types and Approval Levels

Policy Type: Board Policy

Approval Level: Board of Directors; Board Committee

Criteria: Board level policies are high level and help guide the strategic direction of the organization. Policies which fulfill at least one of the criteria identified below must be approved by the Board:

1. Stipulated by legislation, by-laws, the Shareholder Direction or other such framework or compliance requirement;
2. Guides the strategic direction of the organization as it relates to financial controls, employee conduct, service delivery and risk management;
3. Significant impact on many tenant households or on vulnerable tenants; and/or
4. Identified by the Board as pertaining to a matter of significant interest or urgency to the corporation.

Board policies require the approval of the divisional executive, the Executive Leadership Team, and the appropriate Board committee in addition to the Board of Directors. Associated procedures do not require Board approval, though they may be attached for information when the policy is brought forward for approval.

NOTE: If it is unclear whether a new policy should be situated at the Board or Corporate level, the Policy Owner should contact the Manager, Strategy to provide advice. This may include engaging Legal Services and contacting the appropriate Committee Chair for guidance.

Note: Policies that are subject to the Health and Safety Policy Statement authorized by the Chief Executive Officer (CEO) are to be approved by the Chief People and Culture Officer, and other Officers as appropriate, and may be reviewed by the corporation's Joint Health and Safety Coordinating Committee.

Policy Type: Corporate Policy**Approval Level:** Executive Leadership Team (ELT)**Criteria:** Corporate policies are high level and impact the organization as a whole. Corporate policies that fulfill one of the following criteria must be approved by ELT:

1. Enterprise-wide or multi-divisional impacts with significant resource implications;
2. Required to demonstrate compliance with external requirements;
3. Substantial impact or change that affects most employees; and/or
4. Required for consistency across the organization.

Corporate policies require the approval of the divisional executive and ELT. Associated procedures may be attached for information although ELT approval is not required.

NOTE: There may be some areas of overlap in the interpretation of the criteria between Board and Corporate level policies. This is the result of the Board being ultimately responsible for the policies of TCHC and in a position to delegate responsibility to management. Where there is a lack of clarity the appropriate Board or Committee Chair will provide guidance.

Policy Type: Interim Policy**Approval Level:** Executive Leadership Team**Criteria:** In situations where a new policy is urgently required, and there is not enough time for a formal development and approval process, an interim policy can be developed outside of the normal policy development process. Interim policies can be developed if the following criteria **are** met:

1. An emergency or external direction requires TCHC to take immediate action and have a policy in place; and
2. The required policy cannot be developed within the timelines outlined in the Framework.

Interim policies require approval from the divisional executive and ELT. An interim policy is to be active for no longer than one year while the full policy development process is conducted.

Note: An interim policy may require Board approval if directed by the Board.

Summary of Policy Types and Approval Levels			
Policy Type	Divisional executive	ELT	Board*
New and Major Amendments			
Board Policy	A	A	A
Board Policy - Procedures	A	A	I
Corporate Policy	A	A	
Corporate Policy – Procedures	A	I	
Interim Policy	A	A	
Minor Amendments or No Change			
All Policies/Procedures: Minor amendments	A		
All Policies/Procedures: Reviewed and no change required	A		

A = for approval I = for information

* “Board” approval includes the relevant board committee

Policy Review Schedule

Strategic Planning, in consultation with the division leads, maintains a five-year policy review schedule for all policies across the organization. This review schedule is updated with Policy Owners during the annual Business Planning process to reflect changes in policy priorities. The review schedule identifies the policies that will be reviewed each year and is the primary grounds for policy development or amendment.

Grounds for Policy Development or Amendment

1. Strategic Planning notifies the Policy Owner that a policy is due for review according to the policy review schedule; or
2. A policy is identified for development/amendment in response to factors, such as:
 - a. Changes to governance documents;
 - b. Legislative, regulatory, by-law, or government policy changes;

- c. Updates in strategic direction, mandate and alignment with Shareholder and Service Manager direction;
- d. Sustained changes to operations or the external operating environment, including emergency and risk mitigation;
- e. New best practices and/or research results affecting policy area;
- f. External or internal review requests, including City of Toronto Accountability Officers; or
 - Need to review policy through an equity diversity and inclusion (EDI) and confronting anti-black racism (CABR) lens.

Note: If a policy is not included on the review schedule for the year, but a Policy Owner identifies the need for a policy to be amended or developed mid-year, they must provide the business rationale to add it to the schedule complete the Policy Intake Form and submit it to Strategic Planning.

Policy Reviews

All policies and procedures need to be reviewed at minimum every five (5) years. Policy Owners should review their policies to determine if there is a need for the policy to be amended keeping in mind the reasons for policy amendment. If no amendments are required, the Policy Owner should seek approval from their divisional executive and inform Strategic Planning that the review has been completed with no amendments identified. If amendments are needed, the Policy Owner should follow the corresponding process for minor or major amendments.

Minor Amendments

Minor amendments are administrative changes that do not impact the intent or direction of a policy. Minor amendments can include:

- Updates to policy format; or
- Changes to job titles or business unit names.

In these cases, the Policy Owner will work directly with Strategic Planning to make revisions. Ideally, such revisions would be tracked and accumulated throughout the year and amendments only made once a year to the policy. Minor amendments may be made directly in the policy and finalized with divisional executive approval.

Amendments to procedures may be made directly and more frequently as business requirements change. These changes require divisional executive approval.

Policy Development/ Major Amendments Process

There are four (4) stages in the policy development process which must be followed when developing a new policy or making major amendments to an existing policy, they include:

- Initiation;
- Development
- Approval; and
- Implementation.

The following sections provide more details on the requirements for each stage of the process.

1. Initiation

At the initiation stage Policy Owners must:

- Notify Strategic Planning that the policy process is being initiated and complete the Policy Intake Form;
- Identify internal stakeholders to be consulted and/or informed of the policy work,
- Determine whether tenant consultation is required; and
- Develop a workplan;

Strategic Planning can provide support at initiation to identify stakeholders and establish a realistic timeline for the project.

- **Development**

The development stage is where the work of creating or updating a policy begins. Policy Owners should conduct research including jurisdictional or environmental scans, as necessary to inform their policy work and consider any relevant legislation or coordinating policies.

During this stage Policy Owners must:

- Engage with stakeholders identified in the initiation phase;
- Apply a CABR and EDI lens when drafting the policy; and

- Have the policy reviewed by Strategic Planning and Legal Services before moving to approvals.

Stakeholders

The stakeholders engaged in the policy development process will vary based on the focus of the policy and who it impacts. The following internal stakeholders must be included in all policy development:

- Strategic Planning;
- Legal Services;
- The Centre; and
- The Equity, Diversity and Inclusion Team in People & Culture.

Tenant Consultations

Inclusive policy making enhances transparency and accountability and helps to ensure that the policies we create have the outcomes we intend. For policies that have significant impact on many tenant households and/or on vulnerable tenants, tenant consultations are required. There are multiple methods that can be used to consult with tenants to ensure they can participate in a way that meets their needs.

The Policy Owner should work with the Tenant Engagement team in Operations to decide the most appropriate consultation method(s) to use. Operations and Strategic Planning can support the Policy Owner in the planning and delivery of the consultations to aid in obtaining a representative sample of the tenant population.

Confronting Anti-Black Racism and Equity Diversity and Inclusion Lens

Inclusion, diversity, equity, and accessibility are essential in creating a safe, welcoming, and high performing organization. Policies are one of the first places we, as an organization, can demonstrate our commitment to confronting anti-Black racism (CABR) and eliminating barriers for equity-deserving groups.

All policies at TCHC will be developed with an Equity Diversity and Inclusion (EDI) and CABR lens. Applying an EDI and CABR lens will help Policy Owners consider the potential impact of policies and procedures on equity-deserving groups. Policies and procedures should not have an unequal impact, services provided should be accessible, and decisions

should be fair and flexible. An equitable and inclusive policy development process will also ensure that all interested parties and those likely to be impacted by a policy are invited to participate in its development.

Note: More information about how to apply a CABR and EDI lens can be found in the policy toolkit. Policy Owners are also encouraged to reach out to the EDI team in People & Culture and the Centre for more information about how to integrate the EDI and CABR lens into the policy process.

3. Approval

All policies must be reviewed by Strategic Planning and Legal Services before moving to final approvals. Policies must also be approved by the appropriate divisional executive. It is the Policy Owner's responsibility to identify who needs to provide approval within their division and shepherd the policy through this process. All Board and corporate policies must be reviewed and approved by ELT. Board policies must then go to the appropriate Board Committee for approval before going to the Board. All policies brought forward for approval must be accompanied by a briefing note or Board report.

Note: It is recommended that policies which are associated with one another and being updated at the same time should go for approval jointly.

4. Implementation

Implementation of a new or amended policy requires communication, internally and externally as appropriate, to notify impacted parties of the change in policy. Depending on the type of changes, staff training may also be required. Policy Owners should engage both Strategic Communications and Learning & Organizational Development (L&OD) well in advance of the policy being approved to begin developing an implementation plan.

Once a policy has been implemented the Policy Owner is responsible for ongoing monitoring and evaluation of the policy to ensure that:

- Staff act in compliance with the policy; and
- The policy is having the desired outcome.

Roles

Strategic Planning is the owner of the Framework, and is responsible for:

- Acting as a resource to staff for all policy-related inquiries;
- Providing direction and support to Policy Owners, including ensuring that all necessary divisions are involved in the process, and advising on implementation and communications plans;
- Ensuring policy development and amendments are done efficiently and effectively to streamline approvals;
- Performing quality control related to content, formatting and grammar to facilitate a quick and smooth approvals process;
- Ensuring consistent application of the Framework and alignment with the strategic plan;
- Facilitating the identification of a clear Policy Owner when it is unclear;
- Administration related to the Framework; and
- Managing the five (5) year policy review schedule and sharing with ELT and the Board annually.

Policy Owner is the individual from the lead division responsible for leading work on a policy. Policy Owners are the primary subject matter experts and are responsible for:

- Developing policy content and managing implementation;
- Ensuring policies are complete and up to date;
- Identifying the need for new or revised policies; and
- Adhering to standards set out in this Framework.

Legal Services reviews each policy for risk and compliance issues;

The Centre supports policy development and reviews each policy to ensure it has been developed with a CABR lens;

Equity Diversity and Inclusion team supports policy development and reviews each policy to ensure it has been developed with an EDI lens;

Strategic Communications develops communications plans and reviews for style, as needed; and

Learning & Organizational Development (L&OD) identifies organizational learning needs, as needed. If required and appropriate, L&OD develops education content based on final policy documents.

Retiring Policies

From time to time, business or other requirements may change and a policy may no longer be required. Two scenarios are likely to occur:

2. If a policy is being **replaced**, the retirement of the policy must be noted at the end of the new/replacement policy by stating “this policy replaces the former [name of Policy], retired on [date].” The briefing note to the ELT or the Board must include a note about policies being retired.
3. If a policy is **no longer required**, Strategic Planning will file all related documents in the Policy Index in the “inactive/retired” folder and will note the date of retirement on the front page of the policy.

Policy Compliance

All divisional executives are accountable for ensuring that their staff are aware of the policies and procedures applicable to their work.

All employees are responsible for being knowledgeable about the policies and procedures applicable to their work.

As required by the nature of the policy, employees may be required to attest or certify that they have reviewed and understand key policies. Attestations and certifications are managed by the Policy Owner in consultation with Legal Services, People & Culture and Strategic Planning as required.

Policy and Process Administration

- Strategic Planning maintains a Policy Index and Microsoft Word and Adobe PDF copies of all final Board and corporate policies and procedures.
- Strategic Planning is responsible for maintaining the “Policies” page on the TCHC intranet in consultation with Policy Owners and ensuring policies and procedures are accessible to staff.
- Select policies that are of interest to external audiences and policies that apply to Toronto Community Housing tenants are also posted on the external website.

Commencement and Review of the Policy Management Framework

Revision	Date	Description of Changes	Approval
Initial approval	November 2011	Guide to Policy Development, Review or Amendment (new document)	Divisional Executive
Revision #1	June 24, 2014	Changed name to Policy Framework and expanded scope of document	ELT
Revision #2	March 22, 14, 2017	<ul style="list-style-type: none"> • Formatting changes • Update to Policy review timelines • Addition to criteria for Board Policies • Clarity added to SPSR role 	ELT
Revision #3	March 7, 2018	<ul style="list-style-type: none"> • Language changes (ELT to Officers; residents to tenants; procedures to Procedures) • Revisions to Definitions and Criteria section • Under definitions, removal of Standards, Protocols and Guidelines; addition of SOPs 	CEO
Revision #4	DATE	<ul style="list-style-type: none"> • Added Board responsibilities • Removed divisional level policies from scope of the Framework • Added interim policy category • Added requirement for policies to be developed with EDI and CABR lens • Language changes: Officers to ELT 	Board

Appendix : Templates – Policy and Procedure